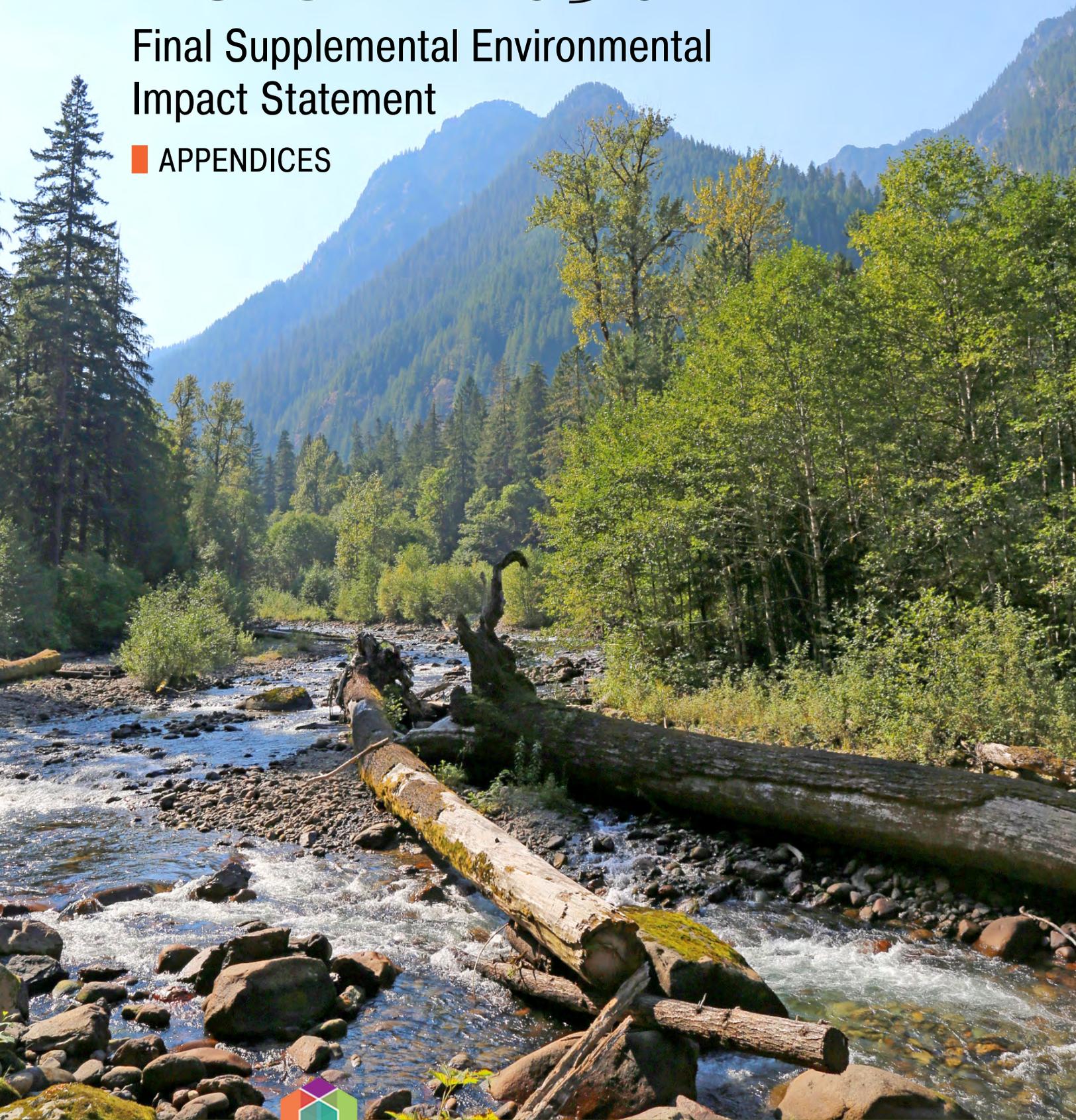


# VISION 2050

## Final Supplemental Environmental Impact Statement

■ APPENDICES

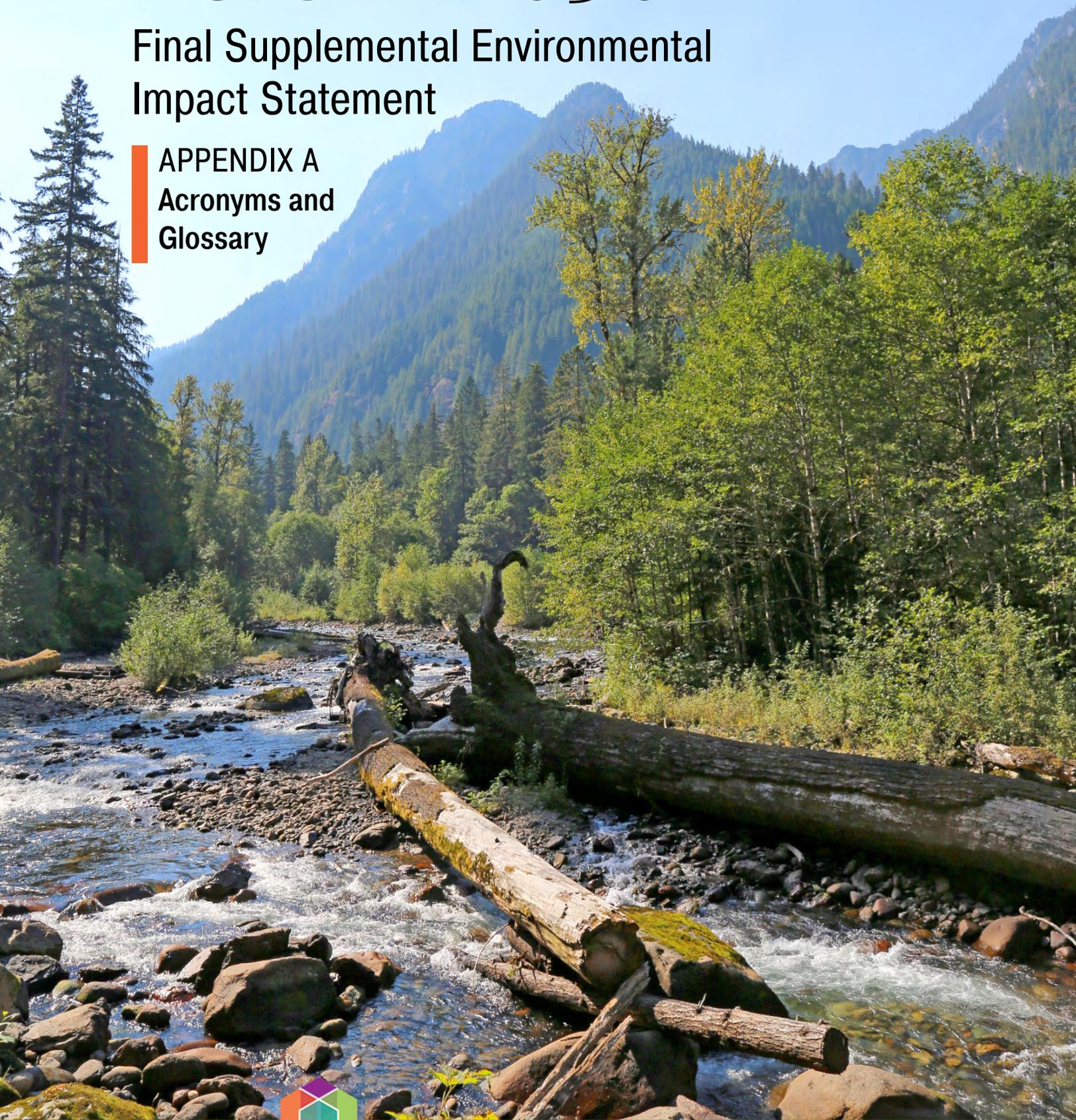




# VISION 2050

## Final Supplemental Environmental Impact Statement

**APPENDIX A**  
**Acronyms and**  
**Glossary**





# Appendix A: Acronyms and Glossary

*This appendix includes a list of acronyms and glossary of technical terms and definitions that appear in the document.*

## Acronyms

ADA	Americans with Disabilities Act
CFR	Code of Federal Regulations
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
Ecology	Washington State Department of Ecology
EIA	Energy Information Administration
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
FEIS	Final Environmental Impact Statement
GMA	Growth Management Act
HCT Communities	High-Capacity Transit Communities
I-5	Interstate 5
I-90	Interstate 90
I-405	Interstate 405
IPCC	Intergovernmental Panel on Climate Change
MIC	manufacturing/industrial center
NAAQS	National Ambient Air Quality Standards
MUGA	Municipal Urban Growth Area
NOAA	National Oceanic and Atmospheric Administration
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
OFM	Washington State Office of Financial Management
PAA	Potential Annexation Area
PM	particulate matter

<b>PM<sub>2.5</sub></b>	fine particulates
<b>PM<sub>10</sub></b>	coarse particulates
<b>PSCAA</b>	Puget Sound Clean Air Agency
<b>PSRC</b>	Puget Sound Regional Council
<b>RCW</b>	Revised Code of Washington
<b>SEIS</b>	Supplemental Environmental Impact Statement
<b>SEPA</b>	State Environmental Policy Act
<b>SR</b>	State Route
<b>SWMMWW</b>	Stormwater Management Manual for Western Washington
<b>WAC</b>	Washington Administrative Code
<b>WDFW</b>	Washington Department of Fish and Wildlife
<b>WDNR</b>	Washington State Department of Natural Resources
<b>WSDOT</b>	Washington State Department of Transportation

# Glossary

## Activity Unit

A unit measuring activity, calculated by adding together the number of residents (population) and jobs (employment) in a given area. Activity units represent the total amount of activity present in an area, and do not distinguish by the mix or proportion of the activity that is residential versus commercial. PSRC has used activity units for other projects; for example, an activity unit threshold has been established as one of the criteria for designating new regional growth centers.

## Adverse Impact

Any undesirable or harmful effect to a person or to any natural or human-made resource.

## Affordable Housing

Affordable housing is generally defined by the U.S. Department of Housing and Urban Development as housing where the occupant is paying no more than 30 percent of gross income for housing costs, including utility costs.

## Alternative

Under Washington's State Environmental Policy Act, an environmental impact statement must evaluate reasonable alternatives that could feasibly attain the proposal's objective and are within a jurisdictional agency's authority to control. Alternatives should cover a broad enough range of scenarios such that all feasible options for a preferred alternative lie within the scope of impacts studied.

## Autonomous Vehicles

Also known as self-driving cars, these are vehicles that navigate the roadway with limited or no human interaction. They use an array of in-vehicle technologies to process their surroundings, detect road signage and markings, and determine the most suitable navigation path.

## Average Annual Vehicle Delay

The amount of time the average person spends in congestion each year.

## Average Daily Vehicle Miles and Minutes

How far the average person is driving each day and how much time is spent in cars.

## CO<sub>2</sub>e (Carbon Dioxide Equivalent)

A term for describing different greenhouse gases in a common unit. For any quantity and type of greenhouse gas, CO<sub>2</sub>e signifies the amount of CO<sub>2</sub> that would have the equivalent global warming impact.

## Communities of Color

Census tracts where over 50 percent of the people are people of color.

## **Community Protocol**

The U.S. Community Protocol is a framework for providing accurate community-level estimates of greenhouse gas emissions. The 2015 inventory for PSCAA adheres to the Community Protocol and includes emissions from transportation and building energy use, water and wastewater treatment and conveyance, land use changes, and solid waste transport and disposal.

## **Connected Vehicle Technology**

Allows vehicles to transmit and receive important mobility, safety, and other information in real time. Communication can occur with other vehicles, traffic lights, pedestrians and bicyclists, and any other entity that may interact with or affect the vehicle.

## **Critical Area**

An area of specific environmental value that is protected from encroachment or adverse impacts from development. Under the Growth Management Act, five types of environmental features are identified as critical areas: wetlands, critical aquifer recharge areas, frequently flooded areas, geologically hazardous areas, and fish and wildlife habitat conservation areas.

## **Cumulative Effect/Impact**

Cumulative impacts from past actions or the incremental effect of the proposed action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over time.

## **Displacement**

The involuntary relocation of current residents or businesses from their current residence. This is a different phenomenon than when property owners voluntarily sell their interests to capture an increase in value. Physical displacement is the result of eviction, acquisition, rehabilitation, or demolition of property, or the expiration of covenants on rent- or income-restricted housing. Economic displacement occurs when residents and businesses can no longer afford escalating rents or property taxes. Cultural displacement occurs when people choose to move because their neighbors and culturally related businesses have left the area.

## **Displacement Risk**

A composite of indicators representing five elements of neighborhood displacement risks: socio-demographics, transportation qualities, neighborhood characteristics, housing, and civic engagement. The data from these five displacement indicators were compiled into a comprehensive index of displacement risk for all census tracts in the region. "Areas of Higher Displacement Risk" is determined by sorting all census tracts based on their index scores and represents the top 10 percent of scores among all tracts.

## **Economic Clusters**

Geographic concentrations of interconnected businesses, suppliers, and institutions that share common markets, technologies, and worker skill needs. These clusters tend to be specialized to a geographic area and represent unique characteristics of the economy.

## **Economic Sectors**

Large components of the economy defined by their place in the production chain, such as manufacturing and construction, services, education, and government. These sectors are usually defined consistently across most economies.

## **Ecosystem**

A functional unit consisting of all the living organisms (plants, animals, and microbes) in a given area and their physical and chemical environment.

## **Endangered Species**

Animals, birds, fish, plants, or other living organisms threatened with extinction by anthropogenic (human-caused) or other natural changes in their environment. Requirements for declaring a species endangered are contained in the federal Endangered Species Act.

## **End-Use Energy**

The output of the power plant that is consumed by homes, businesses, industry, and the transportation sector.

## **Environmental Justice**

Equal protection from environmental hazards for individuals, groups, or communities regardless of race, ethnicity, or economic status. This applies to the development, implementation, and enforcement of environmental laws, regulations, and policies, and implies that no population of people should be forced to shoulder a disproportionate share of negative environmental impacts of pollution or environmental hazard due to a lack of political or economic strength.

## **Equity (also Social Equity)**

All people have the resources and opportunities to improve the quality of their lives and reach their full potential. Differences in life outcomes cannot be predicted by race, class, or any other identity. Those affected by poverty, communities of color, and historically marginalized communities are engaged in decision-making processes, planning, and policy making.

## **Equity Geographies**

Areas where impacts can be differentiated between the entire regional population and social equity populations. Examples are:

1. Communities of color – census tracts where over 50 percent of the residents are people of color.

2. Low-income communities – census tracts where over 50 percent of the households earn less than 200 percent of the federal poverty level.

### **Gentrification**

The influx of capital and higher-income, and oftentimes more highly educated residents into lower income neighborhoods.

### **Growth Management Act (GMA)**

GMA was adopted by the Washington State Legislature in 1990 and 1991 and represents the framework for land use planning and development in Washington state. The act is contained in Chapter 36.70A of the Revised Code of Washington.

Establishes the underlying framework for local governments and state and regional agencies to establish comprehensive plans. Related to land use, these plans designate urban growth areas and describe how population and employment growth would be accommodated within each jurisdiction.

### **High-Capacity Transit Station Areas**

Areas within ½ a mile of existing or planned light rail and streetcar stations, commuter rail stations, ferry terminals, and within ¼ mile of bus rapid transit services stations.

### **Impervious Surface**

A surface that prohibits the movement of water from the land surface into the underlying soil or dirt. Buildings and paved surfaces (e.g., asphalt, concrete) are considered impervious covers. A natural condition (e.g., bedrock close to the surface, very dense soil layers such as hardpan that restrict water movement) is generally not considered an impervious surface.

### **Inclusionary Zoning**

A system that requires a minimum percentage of housing affordable to lower- and moderate-income households to be provided in new developments. Inclusionary programs are based on mandatory requirements or development incentives, such as density bonuses.

### **Infill Development**

Development that takes place on vacant or underutilized parcels within an area that is already characterized by urban development and has access to urban services.

### **Jobs Accessible by Transit, Biking, and Walking**

Number of jobs located within a 45-minute transit trip, a one-mile walk trip, or a three-mile bike trip.

### **Jobs-Housing Balance**

A planning concept that advocates for housing and employment to be located close together. A jobs-housing ratio, which is indexed to the regional average in the VISION 2050 SEIS, compares the number of jobs in relation to the number of housing units in a

given area. A lack of housing, especially housing affordable to moderate- and low-income households close to job centers, will push demand for affordable homes to more distant areas, increasing commute times and development pressure outside of the urban growth area, which could lead to natural resource impacts and higher household transportation costs. A “balance” of jobs and housing is achieved when a community attains roughly the regional average ratio.

### **Lahar**

A specific type of debris flow associated with volcanoes. It is a dense mixture of water-saturated debris that moves down-valley, looking and behaving much like flowing concrete. It occurs when loose masses of unconsolidated material are saturated, become unstable, and move downslope.

### **Level of Service**

A grading system developed by the transportation profession to quantify the degree of comfort (including such elements as speed, travel time, number of stops, total amount of stopped delay, and impediments caused by other vehicles) afforded to drivers or transit riders as they travel through an intersection or roadway segment. This system can also be applied to other public services such as the provision of parks, emergency response time, or pedestrian facilities.

### **Liquefaction**

The process by which loose, unconsolidated soils and fill respond to the shaking motion of an earthquake, causing the soil to liquefy and flow like water, similar to quicksand. This process strongly amplifies ground motion and is a major source of catastrophic damage in earthquakes.

### **Low-Income Communities**

Census tracts where over 50 percent of the households earn less than 200 percent of the federal poverty level.

### **Maintenance Area (Air Quality)**

Any geographic region of the United States previously designated nonattainment pursuant to the Clean Air Act Amendments of 1990 and subsequently redesignated to attainment subject to the requirement to develop a maintenance plan under Section 175A of the Clean Air Act, as amended.

### **Manufacturing/Industrial Centers**

Regionally designated areas for the preservation of intensive manufacturing and industrial activity. These areas are characterized as large contiguous blocks served by the region’s major transportation infrastructure, including roadways, rail, and port facilities.

## **Mitigation**

Mitigation is defined as the following: (1) Avoiding an impact altogether by not taking a certain action or parts of an action; (2) minimizing the impact by limiting the degree or magnitude of the action and its implementation by using appropriate technology or taking affirmative steps to avoid or reduce impacts; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; (5) compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and/or; (6) monitoring the impact and taking appropriate corrective measures.

## **Natural Resource Lands**

Lands not already characterized by urban growth and characterized as one of the following:

- Agricultural lands that have long-term significance for commercial production
- Forest lands that have long-term significance for commercial production
- Mineral resource lands that have long-term significance for extraction of minerals

## **No Action Alternative**

The no action alternative for a plan is generally defined as no change in existing policy. The environmental impacts of predicted growth under this “no action” scenario is then compared to that of the other alternatives.

## **Opportunity Index**

Represents a comprehensive index of five key elements of neighborhood opportunity: education, economic health, housing and neighborhood quality, mobility and transportation, and health and environment. The level of opportunity score (very low, low, moderate, high, very high) is determined by sorting all census tracts into quintiles based on their index scores. Areas of opportunity for this measure are defined as those areas that score “Moderate to Very High Opportunity”—which represents the top 60 percent of scores among all tracts. Areas of opportunity that experience greater proportions of growth may experience an increased risk of displacement.

## **People of Color**

Individuals who report as black, Hispanic, Asian, American Indian, Alaskan Native, Native Hawaiian, other, Pacific Islander, or two or more races or ethnicities. People of color are sometimes referred to as “minority populations” in other PSRC publications or elsewhere to be consistent with U.S. Census Bureau data.

## **People with Low Income**

Individuals with a household income less than 200 percent of the federal poverty level.

**Preferred Alternative**

Under the Washington State Environmental Policy Act, the individual or hybrid alternative that is selected from those analyzed in a draft environmental impact statement for further environmental review in a final or supplemental draft environmental impact statement.

**Primary Energy**

The input to the power plant that generates electricity—from sources such as coal, natural gas, or wind.

**Regional Geographies**

Groupings of cities and unincorporated areas used for planning and growth distribution purposes in the Regional Growth Strategy. Regional geographies include Metropolitan Cities, Core Cities, HCT Communities, Cities & Towns, Urban Unincorporated areas, Rural areas, Resource Lands, and Major Military Installations.

**Regional Growth Centers**

Regionally designated areas of compact development where housing, employment, shopping and other activities are in close proximity. They are focal points of higher density population and employment, with efficient multimodal transportation infrastructure and services. The term “regional growth center” is used to differentiate centers that are designated for regional purposes from those that have a more local focus.

**Riparian Corridor**

Areas adjacent to rivers and streams with a differing density, diversity, and productivity of plant and animal species relative to nearby uplands.

**Rural Lands**

Lands not designated for urban growth, agriculture, forest, or mineral resources. These lands may consist of a variety of uses and densities.

**Scoping**

The first phase of an environmental impact analysis process in which the extent of the project is established. The purpose for environmental scoping is to determine the scope and range of proposed actions, alternatives, environmental elements and impacts, and mitigation measures to be analyzed in the environmental impact statement. The scoping process is also intended to eliminate from detailed study those issues that are not significant, and those that have been covered by prior environmental review.

**Sole Source Aquifer**

An aquifer that supplies 50 percent or more of the drinking water to an area.

## **Sustainability**

Commonly defined as “meeting the needs of the present without compromising the ability of future generations to meet their own needs.” Encompasses environmental, economic, social, and institutional factors.

## **Threatened Species**

An animal or plant species likely to become endangered within the foreseeable future throughout all or a significant portion of its range.

## **Transportation Demand Management**

Activities that help people use the transportation system more efficiently by promoting alternatives to driving alone, shifting trips out of peak travel periods, or eliminating the need for trips.

## **Transportation Mode Share**

The percentage of trips made by people driving alone, carpooling, using transit, walking, or biking.

## **Tribe**

American Indian or Alaska Native entity. A federally recognized tribe is a sovereign nation designated through treaty, Executive, or Congressional Acts and has a government-to-government relationship with the United States, with the responsibilities, powers, limitations, and obligations attached to that designation,

## **Urban Growth Areas**

Areas where “urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature” (RCW 36.70A.110).

## **Urban Lands**

Lands where growth is intended to be concentrated to reduce conversion of undeveloped land and encourage development where public facilities and services exist or can be provided efficiently. These lands occur within a designated urban growth area.

## **UrbanSim**

A software-based simulation model for integrated planning and analysis of urban development, incorporating the interactions between land use, transportation, and public policy.

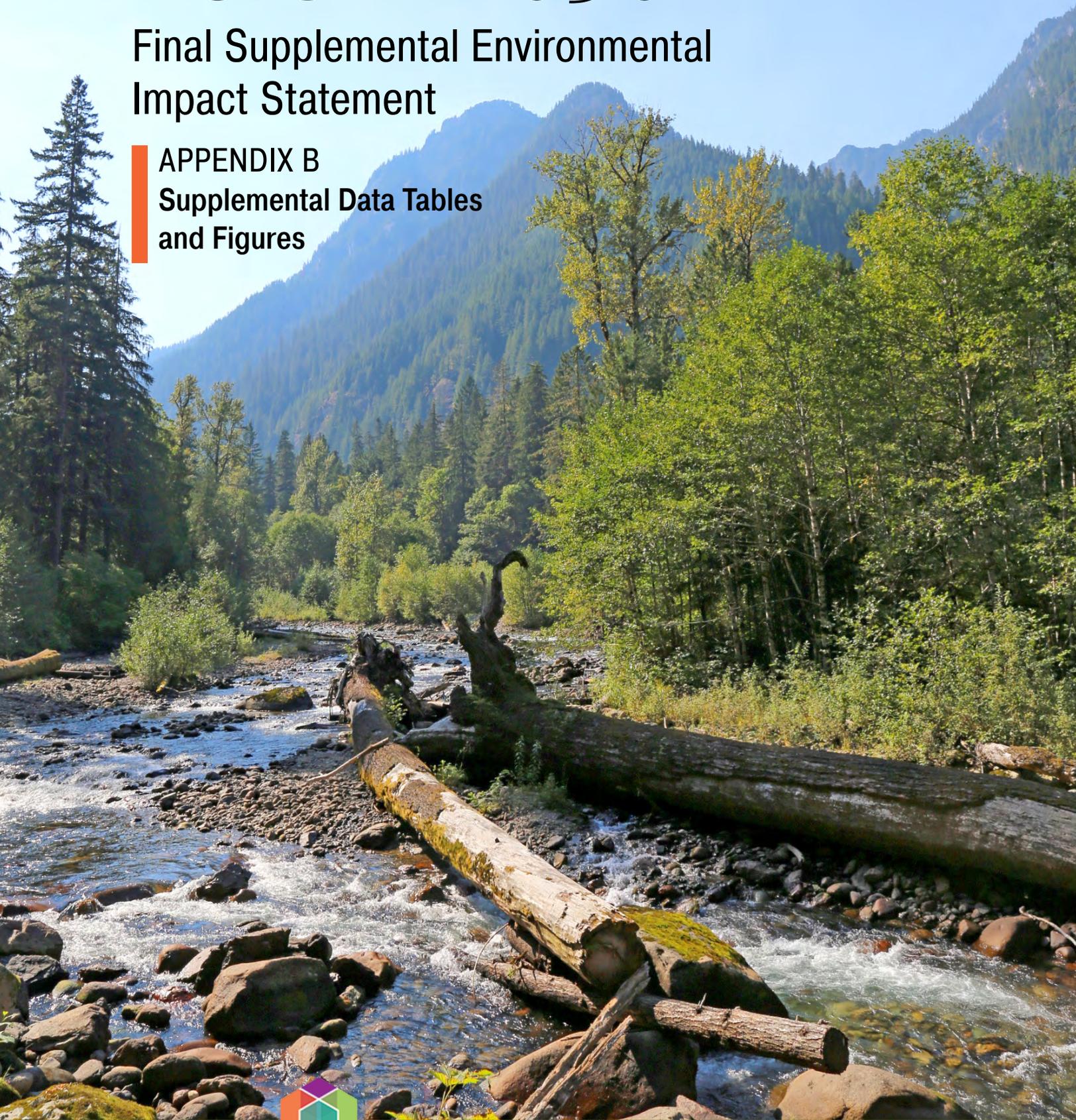
## **Watershed**

The land area that drains into a stream; the watershed for a major river may encompass a number of smaller watersheds that ultimately combine at a common point.

# VISION 2050

## Final Supplemental Environmental Impact Statement

**APPENDIX B**  
**Supplemental Data Tables  
and Figures**





# Appendix B: Supplemental Data Tables and Figures

*This appendix includes supplemental data tables and figures that were reviewed and analyzed in support of the Final Supplemental Impact Statement (Final SEIS). Tables and figures are organized by Section of the Final SEIS, as listed below.*

## **List of Supplemental Data Tables and Figures**

### **Supporting Data for Section 2.1**

Historical and Forecast Population, Region  
2010-2017 Population, by County  
Historical and Forecast Age Demographics, Region

### **Supporting Data for Section 2.2**

Historical and Forecast Employment by Sector, Region  
Employment in Regional Industry Clusters, by County

### **Supporting Data for Section 2.3**

Historical and Forecast Average Household Size, Region  
Historical and Forecast Housing Stock, Region  
Housing Units by Structure Type  
Median Gross Rent (dollars)  
Median Single-Family Housing Price (dollars)

### **Supporting Data for Section 2.4**

Land Area by Growth Management Act Land Use Categories (square miles)  
Designated Regional Growth Centers  
Designated Manufacturing/Industrial Centers

### **Supporting Data for Section 2.6**

Current National Ambient Air Quality Standards for Principal Pollutants

### **Supporting Data for Section 2.9**

Public Water Supply (freshwater), by County, 2015  
Public Water Supply (freshwater), by County, 2000

### **Supporting Data for Section 2.12**

Primary Energy Consumption Estimates (2006-2016) (Trillion Btu)  
End-Use Energy Consumption Estimates (2006-2016) (Trillion Btu)

### **Supporting Data for Section 3.2**

2017-2050 Population and Employment Growth Allocations: Stay the Course

### **Supporting Data for Section 3.3**

2017-2050 Population and Employment Growth Allocations: Transit Focused Growth

### **Supporting Data for Section 3.4**

2017-2050 Population and Employment Growth Allocations: Reset Urban Growth

### **Supporting Data for Section 3.5**

2017-2050 Population and Employment Growth Allocations: Preferred Growth Alternative

### **Supporting Figures for Section 3.6**

Preferred Growth Alternative: Employment Distribution 2017–2050

Stay the Course: Employment Distribution 2017–2050

Transit Focused Growth: Employment Distribution 2017–2050

Reset Urban Growth: Employment Distribution 2017–2050

### **Supporting Data for Section 4.1**

Jobs Housing Index

Housing Units in Areas Zoned for Low-, Moderate-, and High-Density Development

### **Supporting Data for Section 4.2**

Population and Employment in Proximity to Urban Growth Area Boundary

Population and Employment in Proximity to Transit

Population and Employment in Proximity to High-Capacity Transit

Population in Proximity to High-Capacity Transit

Employment in Proximity to High-Capacity Transit

Developed Land (acres)

### **Supporting Data for Section 4.3**

Average Daily Vehicle Miles Traveled by Residents

Total Daily System Vehicle Miles

Average Daily Vehicle Minutes Traveled by Residents

Total Daily System Vehicle Hours

Average Annual Vehicle Delay Hours by Residents

Total Daily System Vehicle Delay Hours

Annual Transit Boardings by Operator

Share of Commute Trips by Travel Mode

Share of Non-Commute Trips by Travel Mode

Average Jobs Accessible per Resident by Travel Mode

Travel Times for Major Corridors

#### Supporting Data for Section 4.4

Projected Pollutant Emissions (tons per day)

#### Supporting Data for Section 4.6

Impervious Surfaces (Acres)

#### Supporting Data for Section 4.8

Population in Proximity to Parks Providing Local Urban Access

#### Supporting Data for Section 5.5

Population in Areas of Moderate to Very High Opportunity

Population in Areas of Higher Displacement Risk

## Supporting Data for Section 2.1

### Historical and Forecast Population, Region

	Year	Population
<b>Actual</b>	1970	1,939,000
	1980	2,240,000
	1990	2,749,000
	2000	3,276,000
	2010	3,691,000
	2017	4,067,000
<b>Forecast</b>	2020	4,241,000
	2030	4,823,000
	2040	5,328,000
	2050	5,823,000

Source: U.S. Census Bureau, WA Office of Financial Management, PSRC

## 2010-2017 Population, by County

Jurisdiction	2010 Population Census	2011 Population Estimate	2012 Population Estimate	2013 Population Estimate	2014 Population Estimate	2015 Population Estimate	2016 Population Estimate	2017 Population Estimate	2018 Population Estimate
King County	1,931,249	1,942,600	1,957,000	1,981,900	2,017,250	2,052,800	2,105,100	2,153,700	2,190,200
Kitsap County	251,133	253,900	254,500	254,000	255,900	258,200	262,590	264,300	267,120
Pierce County	795,225	802,150	808,200	814,500	821,300	830,120	844,490	859,400	872,220
Snohomish County	713,335	717,000	722,900	730,500	741,000	757,600	772,860	789,400	805,120

Source: Office of Financial Management, Forecasting and Research Division

## Historical and Forecast Age Demographics, Region

	Year	Population	% Age 0-17	% Age 18-64	% Age 65+
Actual	1970	1,939,000	37%	54%	9%
	1980	2,240,000	30%	60%	10%
	1990	2,749,000	27%	62%	11%
	2000	3,276,000	27%	62%	10%
	2010	3,691,000	25%	64%	11%
Forecast	2017	4,067,000	24%	62%	14%
	2020	4,241,000	24%	62%	15%
	2030	4,823,000	22%	59%	18%
	2040	5,328,000	22%	60%	19%
	2050	5,823,000	21%	61%	18%

Source: U.S. Census Bureau, PSRC

## Supporting Data for Section 2.2

### Historical and Forecast Employment by Sector, Region

	Actual						Forecast			
Year	1970	1980	1990	2000	2010	2017	2020	2030	2040	2050
<b>Total Employment</b>	<b>751,000</b>	<b>1,067,000</b>	<b>1,489,000</b>	<b>1,883,000</b>	<b>1,890,000</b>	<b>2,233,000</b>	<b>2,357,000</b>	<b>2,678,000</b>	<b>3,037,000</b>	<b>3,392,000</b>
Construction/Resource	42,000	65,000	96,000	124,000	104,000	141,000	144,000	158,000	168,000	165,000
FIRE	49,000	75,000	91,000	116,000	104,000	110,000	113,000	120,000	133,000	150,000
Manufacturing	158,000	208,000	239,000	223,000	171,000	185,000	187,000	186,000	179,000	165,000
Retail	n/a	n/a	154,000	193,000	181,000	236,000	251,000	294,000	343,000	388,000
Services	177,000	332,000	516,000	771,000	844,000	1,038,000	1,124,000	1,341,000	1,597,000	1,880,000
WTU	n/a	n/a	129,000	150,000	138,000	161,000	167,000	182,000	198,000	209,000
Government	n/a	n/a	127,000	144,000	167,000	172,000	180,000	188,000	192,000	190,000
Education	n/a	n/a	93,000	123,000	132,000	144,000	146,000	162,000	181,000	198,000
Uniformed Military	54,000	37,000	43,000	38,000	50,000	46,000	46,000	46,000	46,000	46,000

Source: PSRC

## Employment in Regional Industry Clusters, by County

Year	King		Kitsap		Pierce		Snohomish	
	2010	2017	2010	2017	2010	2017	2010	2017
Industry Cluster								
Aerospace	*	45,630	90	130	2,620	3,170	*	43,500
Business Services	85,190	89,430	3,950	3,650	14,570	15,920	12,930	15,400
Clean Technology	15,750	18,150	1,080	1,000	2,350	2,390	2,000	2,630
Information Technology	114,470	185,540	1,520	1,820	5,630	6,790	7,780	9,810
Life Science & Global Health	18,130	20,290	490	360	1,520	1,690	5,370	5,010
Maritime	*	13,090	650	1,070	1,920	2,030	*	1,150
Philanthropies	2,380	3,340	40	30	240	200	140	160
Tourism	39,240	100,880	1,900	5,500	5,590	17,970	4,190	14,880
Transportation & Logistics	31,280	38,190	490	750	7,700	10,800	2,510	3,230
<b>Total Cluster Employment</b>	<b>359,830</b>	<b>513,700</b>	<b>10,160</b>	<b>14,280</b>	<b>42,070</b>	<b>60,920</b>	<b>70,850</b>	<b>95,510</b>

Source: PSRC

Note: Some industries belong to more than one cluster; jobs in these industries are counted only once in the aggregate total.

\*Estimate subject to confidentiality restrictions.

## Supporting Data for Section 2.3

### Historical and Forecast Average Household Size, Region

	Year	Average Household Size
Actual	1970	2.96
	1980	2.56
	1990	2.48
	2000	2.49
	2010	2.49
Forecast	2017	2.50
	2020	2.51
	2030	2.47
	2040	2.41
	2050	2.36

Source: Source: U.S. Census Bureau, PSRC

## Historical and Forecast Housing Stock, Region

	Year	Housing Units	% Single Family	% Multifamily
Actual	1970	680,000	75%	25%
	1980	895,000	72%	28%
	1990	1,134,000	69%	31%
	2000	1,348,000	69%	31%
	2010	1,571,000	67%	33%
	2017	1,687,000	65%	35%
Forecast	2020	1,745,000	n/a	n/a
	2030	2,013,000	n/a	n/a
	2040	2,287,000	n/a	n/a
	2050	2,547,000	n/a	n/a

Source: U.S. Census Bureau, WA Office of Financial Management, PSRC

## Housing Units by Structure Type

Year	2000	2010	2017
King County Housing Units	742,000	851,000	922,000
% Single Family	63%	60%	57%
% Multifamily	37%	40%	43%
Kitsap County Housing Units	93,000	107,000	111,000
% Single Family	80%	81%	81%
% Multifamily	20%	19%	19%
Pierce County Housing Units	277,000	325,000	346,000
% Single Family	75%	75%	75%
% Multifamily	25%	25%	25%
Snohomish County, Housing Units	1,348,000	287,000	308,000

% Single Family	73%	74%	73%
% Multifamily	27%	26%	27%
<b>Region Housing Units</b>	<b>1,348,000</b>	<b>1,571,000</b>	<b>1,687,000</b>
% Single Family	69%	67%	65%
% Multifamily	31%	33%	35%

Source: U.S. Census Bureau, WA Office of Financial Management

## Median Gross Rent (dollars)

Year	King	Kitsap County	Pierce County	Snohomish
2010	\$1,036	\$936	\$964	\$1,024
2011	\$1,067	\$983	\$957	\$1,039
2012	\$1,109	\$1,010	\$986	\$1,076
2013	\$1,183	\$1,020	\$993	\$1,124
2014	\$1,227	\$1,028	\$1,034	\$1,195
2015	\$1,354	\$1,057	\$1,062	\$1,237
2016	\$1,418	\$1,162	\$1,133	\$1,267
2017	\$1,555	\$1,179	\$1,197	\$1,377

Source: U.S. Census Bureau ACS 1-Year estimates, Table B25064

Note: Gross rent is the contract rent plus the estimated average monthly cost of utilities (electricity, gas, water and sewer) and fuels (oil, coal, kerosene, wood, etc.) if these are paid for by the renter or paid for the renter by someone else

## Median Single-Family Housing Price (dollars)

Year	King	Kitsap	Pierce	Snohomish
2010	\$ 375,500	\$ 235,000	\$ 220,000	\$ 279,500
2011	\$ 348,300	\$ 235,000	\$ 197,000	\$ 241,500
2012	\$ 370,800	\$ 242,200	\$ 195,200	\$ 261,400
2013	\$ 421,900	\$ 245,400	\$ 219,600	\$ 299,700
2014	\$ 454,100	\$ 245,200	\$ 231,400	\$ 331,000
2015	\$ 495,500	\$ 263,900	\$ 255,600	\$ 364,400
2016	\$ 568,400	\$ 292,100	\$ 279,400	\$ 389,800
2017	\$ 650,800	\$ 325,000	\$ 313,200	\$ 439,700

Source: Washington Center for Real Estate Research | UW Runstad Department of Real Estate

Note: Median prices are for single family home resales, excluding new construction.

## Supporting Data for Section 2.4

### Land Area by Growth Management Act Land Use Categories (square miles)

	Land Area					Resource Land Area by Type		
	Total	Urban Non-Resource	Rural Non-Resource	National Park and Forest	Resource	Agriculture	Forest	Mineral and Other Resource
King County	2,147	459	333	846	508	64	439	6
Kitsap County	399	101	289	0	9	0	4	5
Pierce County	1,689	254	507	563	365	35	326	3
Snohomish County	2,102	185	397	1,027	494	97	398	0
<b>Region</b>	<b>6,337</b>	<b>999</b>	<b>1,526</b>	<b>2,436</b>	<b>1,376</b>	<b>196</b>	<b>1,167</b>	<b>14</b>

Source: PSRC, County Comprehensive Plan and Zoning Data

Note: National park and forest lands are designated as resource lands by some counties but not others; for consistency, all national park and forest lands are reported separately from resource lands in this table. Snohomish County's mineral zoning overlay is not accounted for in this table.

### Designated Regional Growth Centers

<b>King County</b>	Auburn	Kirkland Totem Lake	Seattle First Hill/Capitol Hill
	Bellevue Downtown	Redmond Downtown	Seattle Northgate
	Burien	Redmond Overlake	Seattle South Lake Union
	Federal Way	Renton	Seattle University Community
	Issaquah	SeaTac	Seattle Uptown
	Kent	Seattle Downtown	Tukwila
<b>Kitsap County</b>	Bremerton	Silverdale	
<b>Pierce County</b>	Lakewood	Puyallup South Hill	Tacoma Mall
	Puyallup Downtown	Tacoma Downtown	University Place
<b>Snohomish County</b>	Bothell Canyon Park	Everett	Lynnwood

Source: PSRC

## Designated Manufacturing/Industrial Centers

<b>King County</b>	Ballard Interbay	Kent
	Duwamish	North Tukwila
<b>Kitsap County</b>	Puget Sound Industrial Center - Bremerton	
<b>Pierce County</b>	Frederickson	Sumner-Pacific
	Port of Tacoma	
<b>Snohomish County</b>	Cascade Industrial Center - Arlington/Marysville	
	Paine Field/Boeing Everett	

Source: PSRC

## Supporting Data for Section 2.6

### Current National Ambient Air Quality Standards for Principal Pollutants

Pollutant	Averaging Time	Level	Form
Carbon Monoxide (CO)	8 hours	9 ppm	Not to be exceeded more than once per year
	1 hour	35 ppm	
Lead (Pb)	Rolling 3-month average	0.15 µg/m <sup>3</sup>	Not to be exceeded
Nitrogen Dioxide (NO <sub>2</sub> )	1 hour	100 ppb	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
	1 year	53 ppb (2)	Annual Mean
Ozone (O <sub>3</sub> )	8 hours	0.070 ppm	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years
Particle Pollution (PM)	1 year	12.0 µg/m <sup>3</sup>	Annual mean, averaged over 3 years
	1 year	15.0 µg/m <sup>3</sup>	Annual mean, averaged over 3 years
	24 hours	35 µg/m <sup>3</sup>	98th percentile, averaged over 3 years
	24 hours	150 µg/m <sup>3</sup>	Not to be exceeded more than once per year on average over 3 years
Sulfur Dioxide (SO <sub>2</sub> )	1 hour	75 ppb	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
	3 hours	0.5 ppm	Not to be exceeded more than once per year

Source, EPA: <https://www.epa.gov/criteria-air-pollutants/naaqs-table>

## Supporting Data for Section 2.9

### Public Water Supply (freshwater), by County, 2015

County	Population served	Withdrawals (million gallons per day)				
		Groundwater	% Groundwater	Surface water	% Surface Water	Total Water
	(rounded)					
King	1,988,000	60	30%	138	70%	198
Kitsap	212,000	14	73%	5	27%	19
Pierce	778,000	70	63%	41	37%	111
Snohomish	677,000	8	13%	57	87%	65
Total	3,655,000	152	39%	241	61%	393

Source: USGS 2018 (Accessed at: [https://waterdata.usgs.gov/wa/nwis/water\\_use/](https://waterdata.usgs.gov/wa/nwis/water_use/))

### Public Water Supply (freshwater), by County, 2000

County	Population served	Withdrawals (million gallons per day)				
		Groundwater	% Groundwater	Surface water	% Surface Water	Total Water
	(rounded)					
King	1,593,000	78	24%	253	76%	331
Kitsap	191,000	18	75%	6	25%	24
Pierce	675,000	54	45%	66	55%	120
Snohomish	503,000	7	10%	64	90%	71
Total	2,962,000	157	29%	389	71%	546

Source: USGS 2018 (Accessed at: [https://waterdata.usgs.gov/wa/nwis/water\\_use/](https://waterdata.usgs.gov/wa/nwis/water_use/))

## Supporting Data for Section 2.12

### Primary Energy Consumption Estimates (2006-2016) (Trillion Btu)

Year	Coal	Natural Gas	Petroleum	Nuclear	Hydroelectric	Biomass	Wind	Geothermal	Solar	Net intrastate flow of electricity	Net electricity imports	Total
2006	69.2	271.0	796.0	97.3	813.4	111.8	10.3	0.7	0.1	-84.2	-29.5	2056.1
2007	95.7	279.4	821.3	85.1	779.1	89.3	24.1	0.7	0.1	-114.1	-11.1	2049.6
2008	94.6	307.1	768.2	96.9	765.0	95.2	36.0	0.8	0.1	-96.5	-24.8	2042.6
2009	84.0	319.7	734.8	69.4	711.8	105.1	34.9	0.9	0.1	-7.4	-21.1	2032.2
2010	94.9	294.9	728.2	96.6	666.2	121.9	46.3	1.0	0.2	13.5	-23.7	2040.0
2011	57.0	272.3	715.7	50.3	892.1	120.2	60.8	1.3	0.2	-79.3	-23.1	2067.5
2012	42.7	271.9	736.9	97.8	851.3	118.2	62.8	1.1	0.3	-117.9	-21.1	2044.0
2013	75.0	327.8	713.0	88.4	745.7	126.7	66.8	1.1	0.3	-76.9	-21.6	2046.3
2014	76.5	320.2	698.7	99.3	755.7	128.7	69.1	1.1	0.5	-101.9	-25.7	2022.2
2015	58.3	327.7	752.1	85.3	684.1	128.8	65.9	1.1	0.6	-90.5	-11.3	2002.1
2016	53.5	324.9	824.8	100.7	723.3	131.9	74.2	1.1	1.0	-174.3	-2.7	2058.4

Source: U.S. Energy Information Administration

## End-Use Energy Consumption Estimates (2006-2016) (Trillion Btu)

Year	Total	Residential Sector	Commercial Sector	Industrial Sector	Transportation Sector
2006	2056.1	484.9	382.0	560.6	628.5
2007	2049.7	488.3	384.6	509.7	667.1
2008	2042.7	510.5	398.4	526.3	607.5
2009	2032.3	515.0	393.6	525.5	598.2
2010	2040.0	487.9	382.6	578.8	590.7
2011	2067.5	509.1	386.4	583.5	588.5
2012	2044.2	478.9	374.8	582.0	608.5
2013	2046.4	494.3	382.7	573.9	595.5
2014	2022.2	481.9	376.9	577.7	585.7
2015	2022.3	442.9	368.0	565.1	626.3
2016	2058.2	441.1	363.1	554.0	700.1

Source: U.S. Energy Information Administration

## Supporting Data for Section 3.2

### 2017-2050 Population and Employment Growth Allocations: Preferred Growth Alternative

		Metropolitan Cities		Core Cities		HCT Communities		Cities & Towns		Urban Unincorporated		Rural		Total	
		% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation
King County	Population	44%	381,000	40%	346,000	11%	92,000	5%	44,000	0%	4,000	1%	6,000	100%	872,000
	Employment	46%	311,000	45%	310,000	6%	40,000	3%	18,000	0%	1,000	0%	3,000	100%	682,000
Kitsap County	Population	34%	33,000	16%	15,000	36%	34,000	0%	0	6%	6,000	8%	8,000	100%	97,000
	Employment	35%	20,000	26%	15,000	32%	18,000	0%	0	2%	1,000	5%	3,000	100%	57,000
Pierce County	Population	38%	137,000	23%	85,000	21%	77,000	7%	25,000	8%	29,000	3%	11,000	100%	364,000
	Employment	48%	94,000	23%	44,000	15%	29,000	6%	13,000	6%	12,000	2%	3,000	100%	195,000
Snohomish County	Population	20%	87,000	12%	51,000	50%	210,000	11%	45,000	4%	18,000	3%	13,000	100%	424,000
	Employment	39%	89,000	17%	39,000	30%	68,000	8%	18,000	3%	7,000	2%	4,000	100%	225,000
<b>Region</b>	<b>Population</b>	<b>36%</b>	<b>637,000</b>	<b>28%</b>	<b>497,000</b>	<b>24%</b>	<b>413,000</b>	<b>6%</b>	<b>114,000</b>	<b>3%</b>	<b>57,000</b>	<b>2%</b>	<b>38,000</b>	<b>100%</b>	<b>1,756,000</b>
	<b>Employment</b>	<b>44%</b>	<b>514,000</b>	<b>35%</b>	<b>407,000</b>	<b>13%</b>	<b>155,000</b>	<b>4%</b>	<b>49,000</b>	<b>2%</b>	<b>21,000</b>	<b>1%</b>	<b>13,000</b>	<b>100%</b>	<b>1,158,000</b>

Source: PSRC

## Supporting Data for Section 3.3

### 2017-2050 Population and Employment Growth Allocations: Stay the Course

		Metropolitan Cities		Core Cities		HCT Communities		Cities & Towns		Urban Unincorporated		Rural		Total	
		% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation
King County	Population	39%	259,000	41%	272,000	9%	58,000	8%	53,000	0%	0	3%	18,000	100%	661,000
	Employment	42%	280,000	48%	317,000	6%	38,000	4%	24,000	0%	1,000	0%	3,000	100%	662,000
Kitsap County	Population	29%	54,000	15%	28,000	29%	55,000	0%	0	16%	31,000	11%	21,000	100%	189,000
	Employment	31%	20,000	26%	17,000	26%	17,000	0%	0	14%	9,000	3%	2,000	100%	66,000
Pierce County	Population	41%	174,000	31%	134,000	6%	26,000	11%	48,000	8%	33,000	3%	11,000	100%	426,000
	Employment	56%	113,000	22%	45,000	10%	19,000	5%	9,000	5%	11,000	2%	4,000	100%	203,000
Snohomish County	Population	25%	120,000	11%	54,000	35%	169,000	13%	61,000	7%	32,000	9%	44,000	100%	480,000
	Employment	42%	96,000	15%	34,000	26%	58,000	10%	22,000	5%	12,000	2%	5,000	100%	228,000
<b>Region</b>	<b>Population</b>	<b>35%</b>	<b>608,000</b>	<b>28%</b>	<b>488,000</b>	<b>18%</b>	<b>308,000</b>	<b>9%</b>	<b>162,000</b>	<b>5%</b>	<b>96,000</b>	<b>5%</b>	<b>95,000</b>	<b>100%</b>	<b>1,756,000</b>
	<b>Employment</b>	<b>44%</b>	<b>509,000</b>	<b>36%</b>	<b>413,000</b>	<b>12%</b>	<b>133,000</b>	<b>5%</b>	<b>55,000</b>	<b>3%</b>	<b>33,000</b>	<b>1%</b>	<b>14,000</b>	<b>100%</b>	<b>1,158,000</b>

Source: PSRC

## Supporting Data for Section 3.4

### 2017-2050 Population and Employment Growth Allocations: Transit Focused Growth

		Metropolitan Cities		Core Cities		HCT Communities		Cities & Towns		Urban Unincorporated		Rural		Total	
		% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation
King County	Population	44%	381,000	40%	346,000	11%	92,000	5%	44,000	0%	4,000	1%	6,000	100%	872,000
	Employment	46%	311,000	45%	310,000	6%	40,000	3%	18,000	0%	1,000	0%	3,000	100%	682,000
Kitsap County	Population	32%	30,000	16%	15,000	30%	29,000	0%	0	15%	14,000	8%	8,000	100%	97,000
	Employment	33%	19,000	26%	15,000	29%	17,000	0%	0	6%	4,000	5%	3,000	100%	57,000
Pierce County	Population	37%	134,000	28%	101,000	14%	52,000	7%	25,000	11%	41,000	3%	11,000	100%	364,000
	Employment	48%	94,000	23%	44,000	13%	26,000	6%	13,000	8%	15,000	2%	3,000	100%	195,000
Snohomish County	Population	20%	87,000	11%	47,000	54%	231,000	9%	37,000	3%	12,000	2%	10,000	100%	424,000
	Employment	39%	89,000	17%	39,000	30%	68,000	8%	18,000	3%	7,000	2%	4,000	100%	225,000
<b>Region</b>	<b>Population</b>	<b>36%</b>	<b>632,000</b>	<b>29%</b>	<b>509,000</b>	<b>23%</b>	<b>404,000</b>	<b>6%</b>	<b>105,000</b>	<b>4%</b>	<b>70,000</b>	<b>2%</b>	<b>35,000</b>	<b>100%</b>	<b>1,756,000</b>
	<b>Employment</b>	<b>44%</b>	<b>513,000</b>	<b>35%</b>	<b>407,000</b>	<b>13%</b>	<b>151,000</b>	<b>4%</b>	<b>49,000</b>	<b>2%</b>	<b>27,000</b>	<b>1%</b>	<b>13,000</b>	<b>100%</b>	<b>1,158,000</b>

Source: PSRC

## Supporting Data for Section 3.5

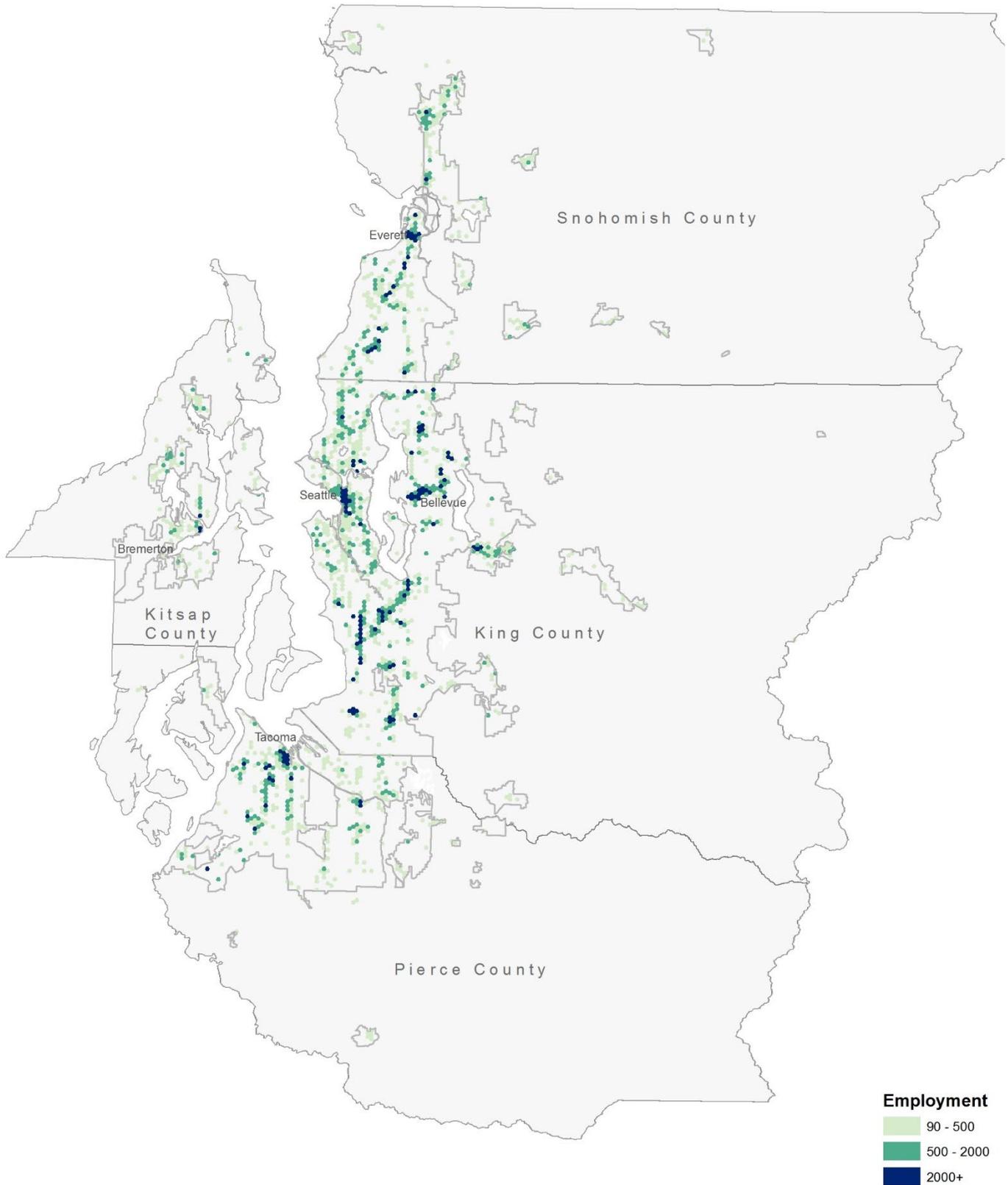
### 2017-2050 Population and Employment Growth Allocations: Reset Urban Growth

		Metropolitan Cities		Core Cities		HCT Communities		Cities & Towns		Urban Unincorporated		Rural		Total	
		% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation	% Share by Regional Geography	Growth Allocation
King County	Population	41%	354,000	38%	331,000	10%	83,000	9%	75,000	1%	4,000	3%	24,000	100%	872,000
	Employment	44%	303,000	44%	300,000	6%	38,000	5%	35,000	0%	1,000	1%	5,000	100%	682,000
Kitsap County	Population	21%	20,000	9%	9,000	30%	29,000	0%	0	24%	23,000	16%	15,000	100%	97,000
	Employment	29%	16,000	24%	13,000	28%	16,000	0%	0	13%	7,000	6%	3,000	100%	57,000
Pierce County	Population	26%	96,000	17%	62,000	7%	26,000	14%	50,000	30%	108,000	6%	22,000	100%	364,000
	Employment	40%	78,000	19%	36,000	13%	25,000	12%	23,000	14%	27,000	3%	6,000	100%	195,000
Snohomish County	Population	19%	82,000	8%	36,000	42%	180,000	3%	15,000	16%	69,000	10%	43,000	100%	424,000
	Employment	34%	76,000	11%	25,000	28%	62,000	7%	16,000	16%	35,000	5%	10,000	100%	225,000
<b>Region</b>	<b>Population</b>	<b>31%</b>	<b>551,000</b>	<b>25%</b>	<b>438,000</b>	<b>18%</b>	<b>318,000</b>	<b>8%</b>	<b>139,000</b>	<b>12%</b>	<b>205,000</b>	<b>6%</b>	<b>104,000</b>	<b>100%</b>	<b>1,756,000</b>
	<b>Employment</b>	<b>41%</b>	<b>473,000</b>	<b>32%</b>	<b>374,000</b>	<b>12%</b>	<b>141,000</b>	<b>6%</b>	<b>74,000</b>	<b>6%</b>	<b>71,000</b>	<b>2%</b>	<b>25,000</b>	<b>100%</b>	<b>1,158,000</b>

Source: PSRC

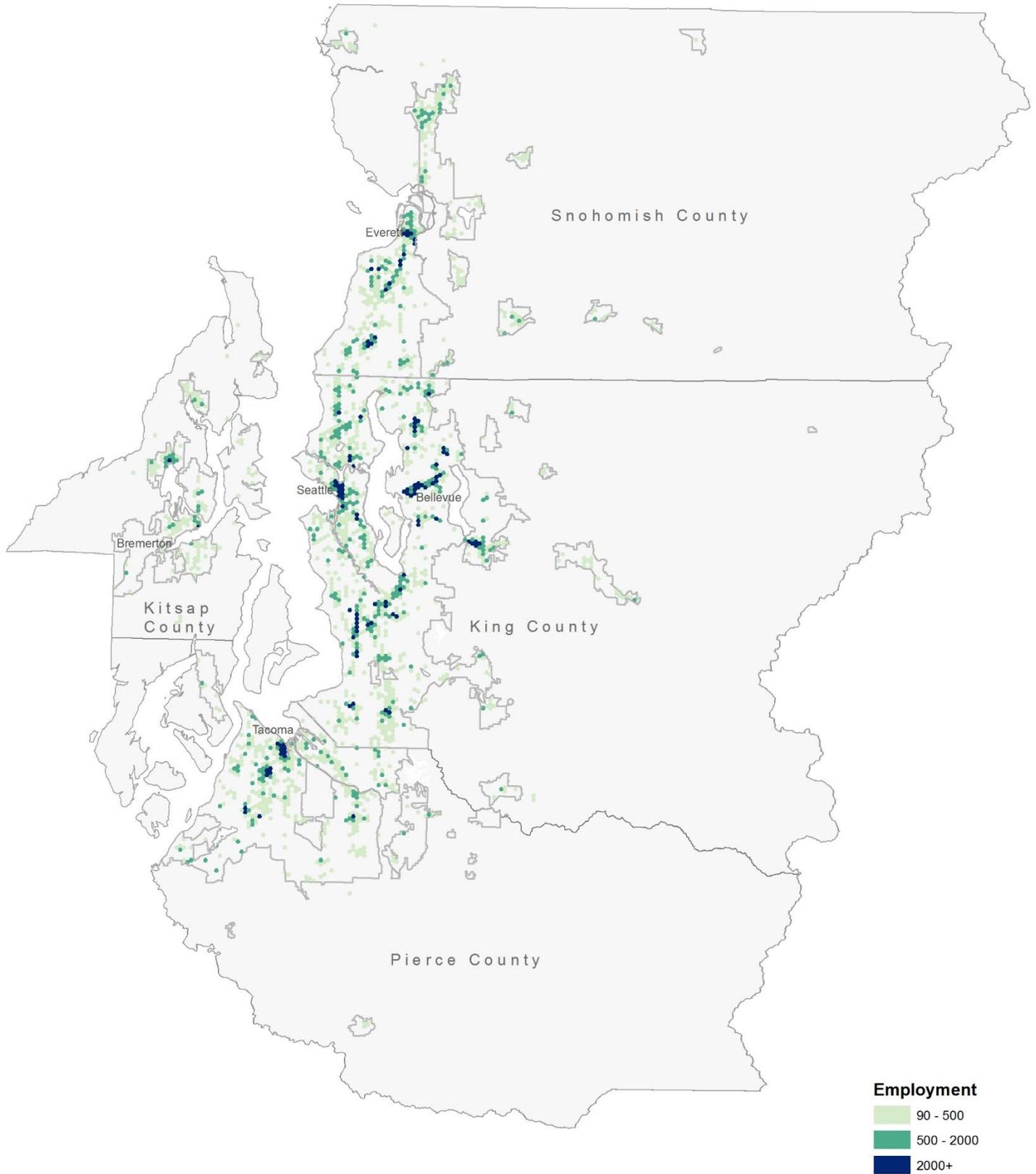
## Supporting Data for Section 3.6

### Preferred Growth Alternative: Employment Distribution 2017–2050



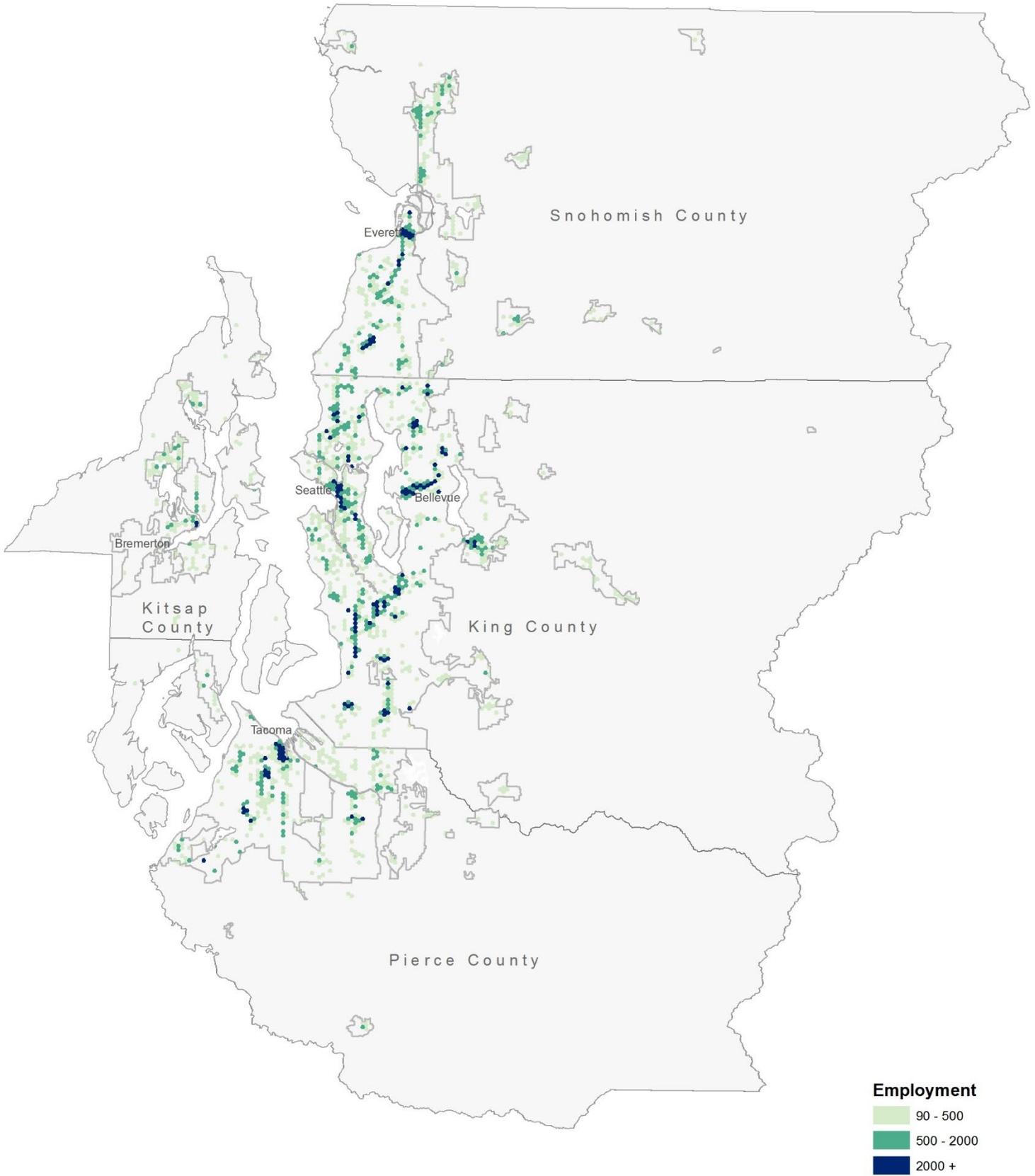
Source: PSRC

# Stay the Course: Employment Distribution 2017–2050



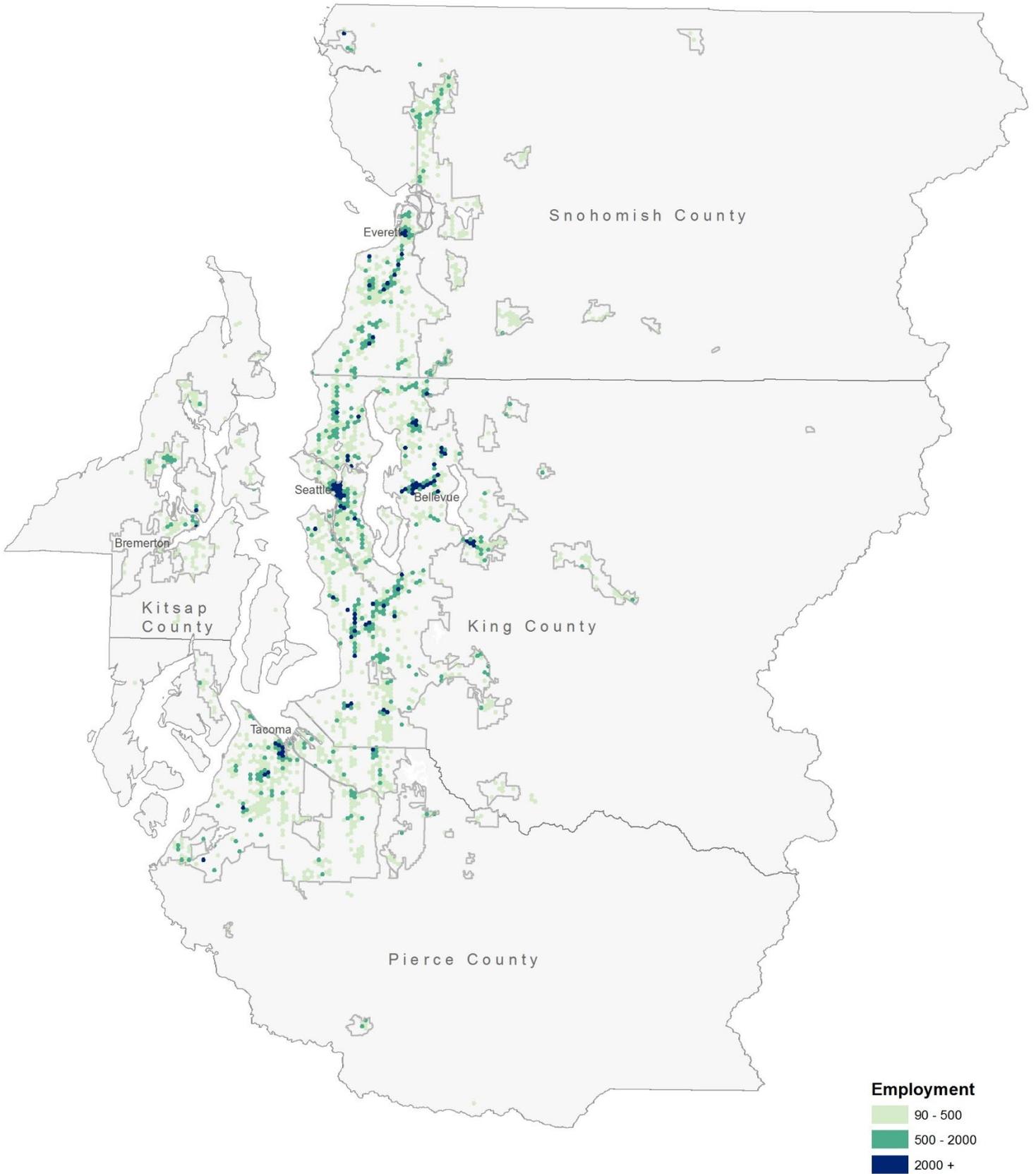
Source: PSRC

# Transit Focused Growth: Employment Distribution 2017–2050



Source: PSRC

# Reset Urban Growth: Employment Distribution 2017–2050



Source: PSRC

## Supporting Data for Section 4.1

### Jobs-Housing Index

	Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
	2017	2050	2050	2050	2050
<b>Regional Subareas</b>					
King County	1.19	1.17	1.26	1.17	1.16
East King	1.26	1.29	1.37	1.29	1.27
Sea-Shore	1.32	1.19	1.29	1.19	1.21
South King	0.97	1.03	1.12	1.03	1.02
Kitsap County	0.71	0.80	0.65	0.80	0.79
Pierce County	0.78	0.81	0.76	0.80	0.81
Snohomish County	0.77	0.81	0.77	0.81	0.80
<b>Equity Geographies</b>					
Census tracts greater than 50% people with low incomes	2.07	1.66	1.67	1.59	1.73
Census tracts greater than 50% people of color	1.58	1.38	1.50	1.37	1.42
<b>Region</b>	<b>1.00</b>	<b>1.00</b>	<b>1.00</b>	<b>1.00</b>	<b>1.00</b>

Source: PSRC

Note: Ratios are indexed to the regional average jobs-housing number to facilitate comparability between the 2017 base year and 2050 values.

## Housing Units in Areas Zoned for Low-, Moderate-, and High-Density Development

		Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
		2017	2017-2050	2050	2017-2050	2050	2017-2050	2050	2017-2050	2050
<b>Counties</b>										
King County	Low Density	516,000	80,000	596,000	90,000	606,000	74,000	590,000	102,000	618,000
		56%	16%	42%	22%	45%	14%	41%	22%	45%
	Moderate Density	180,000	60,000	241,000	51,000	231,000	68,000	248,000	55,000	236,000
		20%	12%	17%	12%	17%	13%	17%	12%	17%
	High Density	223,000	367,000	590,000	271,000	494,000	392,000	616,000	308,000	532,000
		24%	72%	41%	66%	37%	73%	42%	66%	38%
Kitsap County	Low Density	97,000	30,000	127,000	55,000	152,000	29,000	126,000	34,000	131,000
		87%	64%	80%	66%	78%	55%	77%	73%	83%
	Moderate Density	13,000	10,000	23,000	16,000	29,000	13,000	25,000	9,000	22,000
		11%	22%	15%	19%	15%	24%	16%	19%	14%
	High Density	1,000	7,000	8,000	12,000	13,000	11,000	12,000	4,000	5,000
		1%	14%	5%	14%	7%	20%	7%	8%	3%
Pierce County	Low Density	251,000	68,000	319,000	96,000	347,000	61,000	312,000	85,000	337,000
		74%	36%	61%	41%	60%	31%	58%	47%	64%
	Moderate Density	70,000	32,000	102,000	42,000	111,000	38,000	108,000	30,000	100,000
		20%	17%	19%	18%	19%	20%	20%	17%	19%
	High Density	19,000	87,000	106,000	97,000	117,000	97,000	116,000	66,000	86,000
		6%	47%	20%	41%	20%	49%	22%	36%	16%
Snohomish County	Low Density	216,000	51,000	268,000	76,000	293,000	43,000	259,000	76,000	293,000
		70%	25%	52%	37%	57%	19%	48%	41%	59%
	Moderate Density	72,000	37,000	110,000	33,000	105,000	47,000	119,000	29,000	102,000
		24%	18%	21%	16%	20%	21%	22%	16%	20%
	High Density	19,000	115,000	133,000	97,000	116,000	139,000	158,000	83,000	102,000
		6%	56%	26%	47%	23%	61%	30%	44%	21%

		Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
		2017	2017-2050	2050	2017-2050	2050	2017-2050	2050	2017-2050	2050
<b>Equity Geographies</b>										
Census tracts greater than 50% people with low incomes	Low Density	29,000	5,000	33,000	6,000	34,000	5,000	34,000	5,000	34,000
		31%	5%	18%	7%	19%	5%	17%	7%	20%
	Moderate Density	32,000	5,000	37,000	7,000	39,000	6,000	38,000	5,000	37,000
		35%	5%	20%	8%	22%	6%	19%	6%	22%
	High Density	32,000	83,000	115,000	72,000	103,000	96,000	128,000	66,000	98,000
		34%	89%	62%	85%	59%	90%	64%	87%	58%
Census tracts greater than 50% people of color	Low Density	125,000	20,000	145,000	21,000	146,000	21,000	146,000	22,000	147,000
		46%	10%	30%	13%	33%	9%	29%	13%	33%
	Moderate Density	100,000	26,000	126,000	23,000	123,000	31,000	130,000	22,000	122,000
		37%	12%	26%	14%	28%	13%	26%	12%	27%
	High Density	47,000	162,000	208,000	126,000	173,000	175,000	222,000	132,000	178,000
		17%	78%	44%	74%	39%	77%	45%	75%	40%
Region	Low Density	<b>1,080,000</b>	<b>229,000</b>	<b>1,310,000</b>	<b>317,000</b>	<b>1,397,000</b>	<b>206,000</b>	<b>1,287,000</b>	<b>298,000</b>	<b>1,378,000</b>
		<b>64%</b>	<b>24%</b>	<b>50%</b>	<b>34%</b>	<b>53%</b>	<b>20%</b>	<b>48%</b>	<b>34%</b>	<b>54%</b>
	Moderate Density	<b>335,000</b>	<b>140,000</b>	<b>475,000</b>	<b>141,000</b>	<b>476,000</b>	<b>166,000</b>	<b>501,000</b>	<b>124,000</b>	<b>459,000</b>
		<b>20%</b>	<b>15%</b>	<b>18%</b>	<b>15%</b>	<b>18%</b>	<b>16%</b>	<b>19%</b>	<b>14%</b>	<b>18%</b>
	High Density	<b>263,000</b>	<b>575,000</b>	<b>838,000</b>	<b>477,000</b>	<b>740,000</b>	<b>639,000</b>	<b>902,000</b>	<b>461,000</b>	<b>724,000</b>
		<b>16%</b>	<b>61%</b>	<b>32%</b>	<b>51%</b>	<b>28%</b>	<b>63%</b>	<b>34%</b>	<b>52%</b>	<b>28%</b>

Source: PSRC

Note: Low density is defined as less than 12 units/acre, moderate density as 12-49 units/acre, and high density as 50 units/acre and more. These groupings generally translate to single family development; duplex, triplex, and low- to mid-rise apartments and condos; and high-rise apartments and condos.

## Supporting Data for Section 4.2

### Population and Employment in Proximity to Urban Growth Area Boundary

	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	2017	2017-2050	2050	2017-2050	2050	2017-2050	2050	2017-2050	2050
King County	173,000	60,000	233,000	74,000	246,000	52,000	225,000	95,000	268,000
	5%	4%	5%	6%	5%	3%	4%	6%	5%
Kitsap County	46,000	37,000	83,000	56,000	102,000	25,000	72,000	36,000	83,000
	13%	24%	16%	23%	17%	17%	14%	24%	16%
Pierce County	124,000	46,000	171,000	45,000	170,000	39,000	164,000	66,000	190,000
	10%	8%	10%	7%	9%	7%	9%	12%	11%
Snohomish County	115,000	77,000	192,000	100,000	214,000	71,000	186,000	109,000	224,000
	10%	12%	11%	14%	12%	11%	11%	17%	13%
<b>Region</b>	<b>459,000</b>	<b>220,000</b>	<b>678,000</b>	<b>274,000</b>	<b>733,000</b>	<b>188,000</b>	<b>647,000</b>	<b>305,000</b>	<b>764,000</b>
	<b>7%</b>	<b>8%</b>	<b>7%</b>	<b>9%</b>	<b>8%</b>	<b>6%</b>	<b>7%</b>	<b>10%</b>	<b>8%</b>

Source: PSRC

Note: Proximity is defined as within 1/4 mile of either side (inside/outside) of the urban growth area boundary

## Population and Employment in Proximity to Transit Service

	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	2017	2017-2050	2050	2017-2050	2050	2017-2050	2050	2017-2050	2050
<b>Counties</b>									
King County	2,345,000	1,334,000	3,679,000	1,011,000	3,356,000	1,366,000	3,712,000	1,167,000	3,512,000
	65%	86%	71%	76%	68%	88%	72%	75%	68%
Kitsap County	133,000	76,000	209,000	112,000	245,000	84,000	217,000	65,000	198,000
	37%	51%	41%	45%	40%	56%	42%	43%	39%
Pierce County	431,000	362,000	793,000	380,000	811,000	388,000	820,000	242,000	674,000
	36%	65%	45%	60%	44%	69%	46%	43%	38%
Snohomish County	415,000	451,000	866,000	381,000	796,000	512,000	927,000	308,000	723,000
	37%	69%	49%	54%	44%	79%	53%	47%	41%
<b>Equity Geographies</b>									
Census tracts greater than 50% people with low incomes	298,000	301,000	599,000	246,000	544,000	313,000	610,000	212,000	510,000
	62%	90%	74%	82%	69%	90%	74%	79%	68%
Census tracts greater than 50% people of color	806,000	551,000	1,357,000	445,000	1,251,000	563,000	1,369,000	445,000	1,251,000
	64%	87%	72%	76%	68%	88%	73%	75%	68%
<b>Region</b>	<b>3,324,000</b>	<b>2,222,000</b>	<b>5,547,000</b>	<b>1,884,000</b>	<b>5,208,000</b>	<b>2,351,000</b>	<b>5,675,000</b>	<b>1,782,000</b>	<b>5,107,000</b>
	<b>53%</b>	<b>76%</b>	<b>60%</b>	<b>65%</b>	<b>57%</b>	<b>81%</b>	<b>62%</b>	<b>61%</b>	<b>55%</b>

Source: PSRC

Note: Proximity to transit service is defined as within 1/2 mile of light rail stations, commuter rail stations, and ferry terminals, and within 1/4 mile of bus rapid transit and local transit stops.

## Population and Employment in Proximity to High-Capacity Transit

	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	2017	2017-2050	2050	2017-2050	2050	2017-2050	2050	2017-2050	2050
<b>Counties</b>									
King County	1,507,000	1,268,000	2,774,000	846,000	2,372,000	1,308,000	2,815,000	964,000	2,491,000
	42%	82%	54%	64%	48%	84%	54%	62%	48%
Kitsap County	30,000	39,000	66,000	36,000	78,000	64,000	95,000	20,000	62,000
	8%	26%	13%	15%	11%	42%	18%	13%	10%
Pierce County	174,000	349,000	532,000	274,000	455,000	368,000	543,000	169,000	349,000
	14%	62%	31%	44%	24%	66%	30%	30%	19%
Snohomish County	125,000	353,000	479,000	194,000	327,000	444,000	570,000	157,000	289,000
	11%	54%	27%	27%	18%	68%	32%	24%	16%
<b>Equity Geographies</b>									
Census tracts greater than 50% people with low incomes	219,000	305,000	519,000	204,000	424,000	316,000	529,000	182,000	402,000
	44%	92%	64%	68%	53%	92%	64%	68%	53%
Census tracts greater than 50% people of color	528,000	554,000	1,063,000	363,000	883,000	569,000	1,077,000	377,000	897,000
	42%	87%	57%	62%	48%	89%	57%	63%	49%
<b>Region</b>	<b>1,836,000</b>	<b>2,009,000</b>	<b>3,850,000</b>	<b>1,351,000</b>	<b>3,232,000</b>	<b>2,183,000</b>	<b>4,022,000</b>	<b>1,310,000</b>	<b>3,191,000</b>
	<b>29%</b>	<b>69%</b>	<b>42%</b>	<b>46%</b>	<b>35%</b>	<b>75%</b>	<b>44%</b>	<b>45%</b>	<b>34%</b>

Source: PSRC

Note: Proximity to high-capacity transit service is defined as within designated regional growth centers; within 1/2 mile of light rail stations, commuter rail stations, and ferry terminals in the urban growth area; and within 1/4 mile of bus rapid transit stops in the urban growth area

## Population in Proximity to High-Capacity Transit

	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	2017	2017-2050	2050	2017-2050	2050	2017-2050	2050	2017-2050	2050
<b>Counties</b>									
King County	648,000	690,000	1,337,000	413,000	1,061,000	731,000	1,379,000	526,000	1,174,000
	30%	79%	44%	62%	38%	84%	46%	60%	39%
Kitsap County	10,000	24,000	33,000	20,000	31,000	48,000	59,000	7,000	18,000
	4%	25%	10%	11%	7%	51%	16%	7%	5%
Pierce County	76,000	218,000	294,000	186,000	268,000	238,000	314,000	103,000	184,000
	9%	60%	26%	44%	20%	65%	26%	28%	15%
Snohomish County	47,000	208,000	255,000	118,000	167,000	299,000	345,000	94,000	142,000
	6%	49%	21%	24%	13%	70%	28%	22%	12%
<b>Equity Geographies</b>									
Census tracts greater than 50% people with low incomes	93,000	160,000	251,000	117,000	209,000	174,000	265,000	104,000	196,000
	39%	94%	62%	76%	53%	93%	63%	79%	53%
Census tracts greater than 50% people of color	223,000	296,000	517,000	180,000	402,000	316,000	535,000	200,000	421,000
	32%	86%	50%	64%	41%	90%	51%	64%	42%
<b>Region</b>	<b>781,000</b>	<b>1,140,000</b>	<b>1,919,000</b>	<b>737,000</b>	<b>1,527,000</b>	<b>1,314,000</b>	<b>2,097,000</b>	<b>729,000</b>	<b>1,518,000</b>
	<b>19%</b>	<b>65%</b>	<b>33%</b>	<b>42%</b>	<b>26%</b>	<b>75%</b>	<b>36%</b>	<b>41%</b>	<b>26%</b>

Source: PSRC

Note: Proximity to high capacity transit service is defined as within designated regional growth centers; within 1/2 mile of light rail stations, commuter rail stations, and ferry terminals in the UGA; and within 1/4 mile of bus rapid transit stops in the UGA.

## Employment in Proximity to High-Capacity Transit

	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	2017	2017-2050	2050	2017-2050	2050	2017-2050	2050	2017-2050	2050
<b>Counties</b>									
King County	859,000	578,000	1,437,000	433,000	1,311,000	577,000	1,436,000	438,000	1,317,000
	59%	85%	67%	65%	61%	85%	67%	64%	61%
Kitsap County	20,000	15,000	32,000	16,000	47,000	16,000	35,000	13,000	44,000
	19%	26%	21%	25%	21%	28%	22%	23%	20%
Pierce County	98,000	132,000	238,000	88,000	187,000	130,000	229,000	66,000	166,000
	27%	67%	44%	43%	33%	67%	41%	34%	30%
Snohomish County	79,000	145,000	224,000	77,000	159,000	145,000	224,000	64,000	146,000
	25%	65%	41%	34%	29%	65%	42%	28%	26%
<b>Equity Geographies</b>									
Census tracts greater than 50% people with low incomes	126,000	145,000	267,000	87,000	215,000	142,000	264,000	79,000	206,000
	49%	90%	65%	60%	53%	89%	64%	58%	52%
Census tracts greater than 50% people of color	305,000	258,000	546,000	183,000	482,000	254,000	542,000	177,000	476,000
	53%	88%	65%	60%	56%	88%	65%	63%	56%
<b>Region</b>	<b>1,055,000</b>	<b>869,000</b>	<b>1,931,000</b>	<b>613,000</b>	<b>1,705,000</b>	<b>869,000</b>	<b>1,925,000</b>	<b>581,000</b>	<b>1,673,000</b>
	<b>47%</b>	<b>75%</b>	<b>57%</b>	<b>53%</b>	<b>49%</b>	<b>75%</b>	<b>57%</b>	<b>50%</b>	<b>48%</b>

Source: PSRC

Note: Proximity to high capacity transit service is defined as within designated regional growth centers; within 1/2 mile of light rail stations, commuter rail stations, and ferry terminals in the UGA; and within 1/4 mile of bus rapid transit stops in the UGA

## Developed Land (acres)

	Base Year	Preferred Growth				Stay the Course				Transit Focused Growth				Reset Urban Growth			
	2017	2017-2050			2050	2017-2050			2050	2017-2050			2050	2017-2050			2050
		Total Developed	Re-Developed	Vacant Developed		Total Developed	Re-Developed	Vacant Developed		Total Developed	Re-Developed	Vacant Developed		Total Developed	Re-Developed	Vacant Developed	
<b>Counties</b>																	
King County	242,000	74,000	24,000	51,000	293,000	133,000	24,000	109,000	351,000	63,000	21,000	42,000	284,000	137,000	28,000	109,000	351,000
Kitsap County	79,000	26,000	4,700	21,000	101,000	34,000	8,400	26,000	105,000	22,000	4,000	18,000	97,000	32,000	6,300	26,000	105,000
Pierce County	182,000	45,000	19,000	26,000	208,000	79,000	29,000	49,000	232,000	35,000	15,000	20,000	202,000	77,000	27,000	50,000	232,000
Snohomish County	154,000	38,000	18,000	20,000	174,000	78,000	30,000	48,000	201,000	31,000	14,000	17,000	170,000	76,000	28,000	47,000	201,000
<b>Equity Geographies</b>																	
Census tracts greater than 50% people with low incomes	15,000	3,800	2,700	1,100	16,000	4,800	3,300	1,500	16,000	3,800	2,700	1,200	16,000	4,600	3,200	1,500	16,000
Census tracts greater than 50% people of color	52,000	13,000	8,400	4,500	56,000	14,000	8,900	5,600	57,000	12,000	8,000	4,400	56,000	15,000	9,200	5,700	57,000
<b>Region</b>	<b>657,000</b>	<b>184,000</b>	<b>65,000</b>	<b>118,000</b>	<b>776,000</b>	<b>324,000</b>	<b>93,000</b>	<b>231,000</b>	<b>889,000</b>	<b>151,000</b>	<b>54,000</b>	<b>97,000</b>	<b>754,000</b>	<b>322,000</b>	<b>89,000</b>	<b>232,000</b>	<b>890,000</b>

Source: PSRC

Note: Low density residential/mixed use is defined as less than 12 units/acre, moderate density residential/mixed use is defined as 12-49 units/acre, high density residential/mixed use is defined as 50 units/acre and more, and non-residential is defined as all other development types. Redevelopment is defined as any parcel with an existing building that gets redeveloped in the modeling process.

## Supporting Data for Section 4.3

### Average Daily Vehicle Miles Traveled by Residents

	Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
	2014	2050	2050	2050	2050
<b>Counties</b>					
King County	15.4	11.9	12.4	11.8	12.3
Kitsap County	13.8	11.8	11.5	11.5	12.2
Pierce County	16.4	13.7	13.8	13.5	14.4
Snohomish County	18.7	14.6	15.2	14.4	15.5
<b>Metropolitan Cities</b>					
Metropolitan Cities	11.1	7.9	8.1	7.9	8.2
Core Cities	15.2	11.7	12.3	11.6	12.4
HCT Communities	16.0	13.6	13.7	13.1	13.8
Cities & Towns	21.0	18.8	18.6	18.8	18.5
Urban Unincorporated	16.7	16.6	15.4	15.6	16.0
Rural	25.1	23.2	23.5	23.3	23.2
<b>Equity Geographies</b>					
Census tracts greater than 50% people with low incomes	10.9	7.8	8.2	7.8	8.3
Census tracts greater than 50% people of color	13.1	10.2	10.6	10.3	10.7
<b>Region</b>	<b>16.1</b>	<b>12.8</b>	<b>13.3</b>	<b>12.7</b>	<b>13.4</b>

Source: PSRC

Note: This measure is calculated for all trips that use a private vehicle (both drive alone and shared ride) for residents in each defined geography. This metric does not include miles driven by trucks or by people who live outside the region.

## Total Daily System Vehicle Miles

	Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
	2014	2050	2050	2050	2050
King County	42,300,000	53,700,000	53,600,000	53,600,000	55,300,000
Kitsap County	4,700,000	6,000,000	6,700,000	5,900,000	6,100,000
Pierce County	16,700,000	23,100,000	23,700,000	22,900,000	23,900,000
Snohomish County	15,900,000	21,900,000	23,100,000	21,700,000	22,900,000
<b>Region</b>	<b>79,600,000</b>	<b>104,700,000</b>	<b>107,200,000</b>	<b>104,000,000</b>	<b>108,100,000</b>

Source: PSRC

Note: Table displays data related to the roadways located in each geography. It includes travel by residents, non-residents, and trucks. Vehicles are defined as personally owned vehicles and trucks.

## Average Daily Vehicle Minutes Traveled by Residents

	Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
	2014	2050	2050	2050	2050
<b>Counties</b>					
King County	37.0	31.5	32.8	31.3	32.9
Kitsap County	32.1	30.3	30.8	29.6	31.5
Pierce County	37.8	34.9	35.6	34.5	37.2
Snohomish County	40.6	36.4	38.3	35.6	38.7
<b>Regional Geographies</b>					
Metropolitan Cities	30.6	24.2	24.9	24.2	25.1
Core Cities	35.5	30.4	32.1	30.0	32.5
HCT Communities	37.5	35.7	36.4	34.3	36.6
Cities & Towns	42.5	42.2	42.8	42.1	42.8
Urban Unincorporated	37.5	40.6	39.0	38.7	40.6
Rural	52.8	52.7	54.1	52.6	53.6
<b>Equity Geographies</b>					
Census tracts greater than 50% people with low incomes	27.1	22.2	23.4	22.2	23.7
Census tracts greater than 50% people of color	32.3	28.2	29.1	28.4	29.5
<b>Region</b>	<b>37.5</b>	<b>33.2</b>	<b>34.5</b>	<b>32.8</b>	<b>34.9</b>

Source: PSRC

Note: This measure is calculated for all trips that use a private vehicle (both drive alone and shared ride) for residents in each defined geography. This metric does not include miles driven by trucks or by people who live outside the region.

## Total Daily System Vehicle Hours

	Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
	2014	2050	2050	2050	2050
King County	1,290,000	1,790,000	1,790,000	1,780,000	1,870,000
Kitsap County	140,000	190,000	220,000	190,000	190,000
Pierce County	510,000	820,000	850,000	810,000	860,000
Snohomish County	460,000	720,000	780,000	710,000	760,000
<b>Region</b>	<b>2,390,000</b>	<b>3,520,000</b>	<b>3,640,000</b>	<b>3,480,000</b>	<b>3,680,000</b>

Source: PSRC

Note: Table displays data related to the roadways located in each geography. It includes travel by residents, non-residents, and trucks. Vehicles are defined as personally owned vehicles and trucks.

## Average Annual Vehicle Delay Hours by Residents

	Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
	2014	2050	2050	2050	2050
<b>Counties</b>					
King County	22.1	26.6	27.6	26.1	29.0
Kitsap County	8.7	15.2	19.4	14.7	17.4
Pierce County	18.8	27.2	29.0	26.6	31.4
Snohomish County	26.2	36.9	41.0	35.7	40.4
<b>Regional Geographies</b>					
Metropolitan Cities	16.4	17.4	17.9	17.4	18.5
Core Cities	22.1	27.1	29.0	26.6	30.2
HCT Communities	25.2	36.2	38.7	35.2	38.6
Cities & Towns	23.7	36.0	39.6	34.8	40.2
Urban Unincorporated	22.4	37.8	37.5	35.2	40.9
Rural	22.6	36.6	41.1	35.6	40.5
<b>Equity Geographies</b>					
Census tracts greater than 50% people with low incomes	14.6	17.7	19.1	17.3	19.7
Census tracts greater than 50% people of color	18.4	23.2	23.7	23.3	25.2
<b>Region</b>	<b>21.3</b>	<b>28.2</b>	<b>30.2</b>	<b>27.5</b>	<b>31.2</b>

Source: PSRC

Note: This measure is calculated for all trips that use a private vehicle (both drive alone and shared ride) for residents in each defined geography. This metric does not include delay for trucks or for people who live outside the region. Delay is measured as the difference between travel in the middle of the night (considered "free-flow") and travel during a specific time of day.

## Total Daily System Vehicle Delay Hours

	Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
	2014	2050	2050	2050	2050
King County	185,000	358,000	362,000	355,000	385,000
Kitsap County	10,000	25,000	31,000	25,000	25,000
Pierce County	58,000	185,000	194,000	183,000	200,000
Snohomish County	52,000	143,000	164,000	139,000	155,000
<b>Region</b>	<b>304,000</b>	<b>711,000</b>	<b>751,000</b>	<b>702,000</b>	<b>765,000</b>

Source: PSRC

Note: Table displays data related to the roadways located in each geography. It includes travel by residents, non-residents, and trucks. Vehicles are defined as personally owned vehicles and trucks.

## Annual Transit Boardings by Operator

	Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
	2014	2050	2050	2050	2050
Community Transit	10,778,000	27,296,000	25,743,000	28,033,000	24,981,000
Everett Transit	1,979,000	4,664,000	4,837,000	4,618,000	4,107,000
King County Metro	128,338,000	246,393,000	225,676,000	245,220,000	239,682,000
Kitsap Transit	4,499,000	13,982,000	16,805,000	14,342,000	14,108,000
Pierce Transit	12,587,000	30,019,000	31,798,000	30,331,000	26,710,000
Sound Transit	36,261,000	181,803,000	168,868,000	184,047,000	171,489,000
<b>Region</b>	<b>194,441,000</b>	<b>504,156,000</b>	<b>473,727,000</b>	<b>506,590,000</b>	<b>481,076,000</b>

Source: PSRC

Note: Estimates do not include ferry boardings.

## Share of Commute Trips by Travel Mode

		Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
		2014	2050	2050	2050	2050
<b>Counties</b>						
King County	SOV	68%	57%	59%	57%	59%
	HOV	13%	13%	13%	13%	13%
	Transit	9%	14%	13%	14%	13%
	Walk	6%	11%	10%	12%	11%
	Bike	3%	5%	4%	5%	4%
Kitsap County	SOV	75%	70%	70%	69%	71%
	HOV	14%	13%	13%	13%	13%
	Transit	2%	2%	3%	2%	2%
	Walk	7%	10%	10%	11%	9%
	Bike	3%	4%	4%	4%	4%
Pierce County	SOV	77%	69%	69%	68%	71%
	HOV	14%	14%	14%	14%	14%
	Transit	1%	3%	3%	3%	2%
	Walk	5%	10%	10%	11%	9%
	Bike	3%	5%	5%	5%	4%
Snohomish County	SOV	76%	68%	69%	67%	70%
	HOV	14%	14%	14%	14%	14%
	Transit	2%	5%	5%	6%	5%
	Walk	4%	9%	8%	9%	7%
	Bike	2%	4%	4%	4%	4%

		Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
		2014	2050	2050	2050	2050
<b>Equity Geographies</b>						
Census tracts greater than 50% people with low incomes	SOV	71%	56%	59%	56%	59%
	HOV	14%	13%	13%	13%	13%
	Transit	6%	11%	9%	11%	10%
	Walk	6%	15%	14%	16%	13%
	Bike	4%	5%	5%	5%	5%
Census tracts greater than 50% people of color	SOV	72%	61%	63%	60%	62%
	HOV	14%	14%	14%	14%	14%
	Transit	7%	11%	10%	11%	10%
	Walk	5%	10%	9%	10%	9%
	Bike	3%	5%	4%	5%	4%
<b>Region</b>	<b>SOV</b>	<b>71%</b>	<b>62%</b>	<b>63%</b>	<b>61%</b>	<b>64%</b>
	<b>HOV</b>	<b>14%</b>	<b>13%</b>	<b>13%</b>	<b>13%</b>	<b>13%</b>
	<b>Transit</b>	<b>6%</b>	<b>10%</b>	<b>9%</b>	<b>10%</b>	<b>9%</b>
	<b>Walk</b>	<b>6%</b>	<b>11%</b>	<b>10%</b>	<b>11%</b>	<b>10%</b>
	<b>Bike</b>	<b>3%</b>	<b>4%</b>	<b>4%</b>	<b>4%</b>	<b>4%</b>

Source: PSRC

SOV – single-occupancy vehicle

HOV – high-occupancy vehicle (2 or more occupants)

## Share of Non-Commute Trips by Travel Mode

		Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
		2014	2050	2050	2050	2050
<b>Counties</b>						
King County	SOV	33%	27%	28%	26%	28%
	HOV	40%	37%	38%	37%	37%
	Transit and School Bus	6%	8%	7%	8%	7%
	Walk	20%	27%	25%	27%	26%
	Bike	1%	2%	2%	2%	2%
Kitsap County	SOV	35%	33%	33%	32%	34%
	HOV	41%	40%	39%	39%	40%
	Transit and School Bus	4%	4%	4%	4%	4%
	Walk	18%	22%	23%	23%	21%
	Bike	1%	1%	1%	2%	1%
Pierce County	SOV	33%	29%	30%	29%	31%
	HOV	45%	42%	42%	42%	43%
	Transit and School Bus	4%	5%	5%	5%	5%
	Walk	16%	21%	22%	22%	19%
	Bike	1%	2%	2%	2%	2%
Snohomish County	SOV	34%	30%	31%	30%	32%
	HOV	45%	42%	42%	42%	43%
	Transit and School Bus	4%	4%	4%	4%	4%
	Walk	16%	22%	21%	22%	20%
	Bike	1%	2%	2%	2%	1%

		Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
		2014	2050	2050	2050	2050
<b>Equity Geographies</b>						
Census tracts greater than 50% people with low incomes	SOV	32%	25%	27%	25%	27%
	HOV	40%	35%	35%	35%	36%
	Transit and School Bus	6%	7%	7%	7%	7%
	Walk	20%	31%	29%	31%	28%
	Bike	2%	2%	2%	2%	2%
Census tracts greater than 50% people of color	SOV	33%	28%	29%	28%	29%
	HOV	43%	39%	39%	39%	39%
	Transit and School Bus	5%	7%	7%	7%	7%
	Walk	17%	25%	23%	25%	23%
	Bike	1%	2%	2%	2%	2%
<b>Region</b>	<b>SOV</b>	<b>33%</b>	<b>28%</b>	<b>29%</b>	<b>28%</b>	<b>29%</b>
	<b>HOV</b>	<b>42%</b>	<b>39%</b>	<b>40%</b>	<b>39%</b>	<b>40%</b>
	<b>Transit and School Bus</b>	<b>5%</b>	<b>6%</b>	<b>6%</b>	<b>6%</b>	<b>6%</b>
	<b>Walk</b>	<b>18%</b>	<b>25%</b>	<b>23%</b>	<b>25%</b>	<b>23%</b>
	<b>Bike</b>	<b>1%</b>	<b>2%</b>	<b>2%</b>	<b>2%</b>	<b>2%</b>

Source: PSRC

SOV – single-occupancy vehicle

HOV – high-occupancy vehicle (2 or more occupants)

## Average Jobs Accessible per Resident by Travel Mode

		Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
		2014	2050	2050	2050	2050
<b>Counties</b>						
King County	Jobs within 45-min Transit Trip*	192,600	457,900	421,400	461,100	425,800
	Jobs within 1-mile Walk Trip	11,400	31,700	28,600	31,700	29,700
	Jobs within 3-mile Bike Trip	64,900	131,000	123,400	130,800	126,000
Kitsap County	Jobs within 45-min Transit Trip*	4,200	15,600	17,500	17,600	14,400
	Jobs within 1-mile Walk Trip	1,300	2,600	3,000	3,200	2,300
	Jobs within 3-mile Bike Trip	7,900	14,900	16,900	15,600	13,700
Pierce County	Jobs within 45-min Transit Trip*	20,100	88,100	88,600	93,700	64,800
	Jobs within 1-mile Walk Trip	2,200	8,000	8,000	8,500	5,700
	Jobs within 3-mile Bike Trip	16,400	39,500	40,700	39,900	30,700
Snohomish County	Jobs within 45-min Transit Trip*	25,800	118,300	102,500	124,000	94,800
	Jobs within 1-mile Walk Trip	2,000	6,900	5,600	7,200	4,600
	Jobs within 3-mile Bike Trip	19,200	39,600	38,700	40,500	34,700
<b>Equity Geographies</b>						
Census tracts greater than 50% people with low incomes	Jobs within 45-min Transit Trip*	158,400	396,200	361,800	384,600	386,100
	Jobs within 1-mile Walk Trip	11,200	30,900	27,800	30,100	27,400
	Jobs within 3-mile Bike Trip	51,500	106,600	104,000	103,500	104,900
Census tracts greater than 50% people of color	Jobs within 45-min Transit Trip*	140,700	386,100	351,800	383,300	362,900
	Jobs within 1-mile Walk Trip	6,100	17,900	15,600	17,700	15,800
	Jobs within 3-mile Bike Trip	47,600	100,300	95,600	99,500	96,800
<b>Region</b>	Jobs within 45-min Transit Trip*	<b>114,300</b>	<b>289,600</b>	<b>251,400</b>	<b>293,600</b>	<b>263,100</b>
	Jobs within 1-mile Walk Trip	<b>7,100</b>	<b>20,300</b>	<b>17,400</b>	<b>20,500</b>	<b>18,300</b>
	Jobs within 3-mile Bike Trip	<b>42,800</b>	<b>87,500</b>	<b>79,600</b>	<b>87,700</b>	<b>82,100</b>

Source: PSRC

Note: Values represent the average number of jobs accessible per capita (resident) by home location. \*A 45-minute transit trip includes walk, wait, and in-transit time.

## Travel Times for Major Corridors

From	Base Year (2014)	Year 2050 Travel Time (Minutes)				Difference from Stay the Course (Minutes)		
		Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth	Preferred Growth	Transit Focused Growth	Reset Urban Growth
Auburn to Renton: AM	28	35	37	36	37	-2	-1	0
Renton to Auburn: PM	29	36	37	36	37	-1	-1	0
Bellevue to Seattle: AM	27	29	29	29	30	0	0	1
Seattle to Bellevue: PM	26	29	29	29	30	0	0	1
Bellevue to Tukwila: PM	37	37	37	37	38	0	0	1
Tukwila to Bellevue: AM	35	38	37	37	39	1	0	2
Bellevue to Lynnwood: PM	42	45	45	44	44	0	-1	-1
Lynnwood to Bellevue: AM	43	45	48	45	46	-3	-3	-2
Bremerton to Silverdale: PM	17	18	20	18	18	-2	-2	-2
Silverdale to Bremerton: AM	18	19	20	19	19	-1	-1	-1
Everett to Seattle: AM	65	79	82	78	80	-3	-4	-2
Seattle to Everett: PM	63	78	82	77	80	-4	-5	-2
Redmond to Seattle: AM	30	33	33	32	33	0	-1	0
Seattle to Redmond: PM	28	32	31	32	32	1	1	1
Seattle to Tacoma: PM	63	80	84	80	82	-4	-4	-2
Tacoma to Seattle: AM	66	83	88	84	86	-5	-4	-2

Source: PSRC

## Supporting Data for Section 4.4

### Projected Pollutant Emissions (tons per day)

	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	2014	2050	% change from base year	2050	% change from base year	2050	% change from base year	2050	% change from base year
Carbon Monoxide	866.5	203.0	-77%	205.5	-76%	202.4	-77%	206.3	-76%
Nitrogen Oxide	150.1	21.2	-86%	21.6	-86%	21.1	-86%	21.8	-85%
Volatile Organic Compounds	50.5	6.3	-88%	6.4	-87%	6.3	-88%	6.4	-87%
CO <sub>2</sub> Equivalent	47,187	39,429	-16%	40,507	-14%	39,140	-17%	40,900	-13%
PM <sub>10</sub>	8.70	7.49	-14%	7.76	-11%	7.41	-15%	7.86	-10%
PM <sub>2.5</sub>	5.27	1.56	-70%	1.60	-70%	1.54	-71%	1.62	-69%

Source: PSRC

Note: All emissions calculated using wintertime rates, except for Volatile Organic Compounds, which are shown at their maximum during summer.

## Supporting Data for Section 4.6

### Impervious Surfaces (acres)

	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	2017	2017-2050	2050	2017-2050	2050	2017-2050	2017-2050	2017-2050	2050
Counties									
King County	129,600	5,100	134,700	7,500	137,100	4,200	133,800	8,000	137,600
Kitsap County	23,400	1,300	24,700	2,200	25,600	1,100	24,500	1,800	25,200
Pierce County	66,100	5,500	71,600	7,900	74,000	4,500	70,600	8,000	74,100
Snohomish County	53,800	3,200	57,000	5,100	58,900	2,400	56,200	4,800	58,600
Built before 1996	223,900	(19,000)	204,900	(23,100)	200,800	(17,000)	206,900	(21,700)	202,200
Built 1996 and after	49,000	8,300	57,300	13,600	62,600	7,200	56,200	14,000	63,000
Built before 1996, redeveloped	-	25,800	25,800	32,100	32,100	22,000	22,000	30,300	30,300
<b>Region</b>	<b>273,000</b>	<b>15,100</b>	<b>288,100</b>	<b>22,600</b>	<b>295,600</b>	<b>12,200</b>	<b>285,200</b>	<b>22,600</b>	<b>295,600</b>

Source: PSRC, Parametrix

Note: Stormwater management guidelines established in the WA Department of Ecology's "1992 Stormwater Management Manual for the Puget Sound Basin" came into widespread practice by 1996.

## Supporting Data for Section 4.8

### Population in Proximity to Parks Providing Local Urban Access

	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	2017	2017-2050	2050	2017-2050	2050	2017-2050	2050	2017-2050	2050
<b>Counties</b>									
King County	1,465,000	635,000	2,100,000	475,000	1,940,000	640,000	2,105,000	614,000	2,078,000
	72%	73%	72%	73%	73%	74%	73%	72%	72%
Kitsap County	56,000	30,000	85,000	57,000	112,000	42,000	97,000	24,000	80,000
	35%	35%	36%	35%	36%	49%	41%	30%	34%
Pierce County	273,000	152,000	425,000	193,000	466,000	172,000	445,000	130,000	403,000
	39%	43%	41%	47%	42%	49%	43%	38%	39%
Snohomish County	303,000	162,000	465,000	180,000	483,000	152,000	455,000	146,000	449,000
	46%	39%	43%	41%	44%	37%	42%	38%	43%
<b>Equity Geographies</b>									
Census tracts greater than 50% people with low incomes	140,000	108,000	248,000	99,000	239,000	124,000	264,000	89,000	229,000
	60%	63%	61%	65%	61%	67%	63%	68%	62%
Census tracts greater than 50% people of color	421,000	196,000	617,000	161,000	582,000	211,000	632,000	185,000	606,000
	60%	57%	59%	57%	59%	60%	60%	60%	60%
<b>Region</b>	<b>2,096,000</b>	<b>979,000</b>	<b>3,075,000</b>	<b>905,000</b>	<b>3,002,000</b>	<b>1,006,000</b>	<b>3,102,000</b>	<b>914,000</b>	<b>3,010,000</b>
	<b>59%</b>	<b>57%</b>	<b>59%</b>	<b>55%</b>	<b>58%</b>	<b>58%</b>	<b>59%</b>	<b>55%</b>	<b>58%</b>

Source: PSRC

Note: Proximity is defined as within 1/4 mile; parks providing local urban access is defined as currently existing parks, trails, and other open space facilities located in the urban growth area or within 1/4 mile of the urban growth area boundary.

## Supporting Data for Section 5.5

### Population in Areas of Moderate to Very High Opportunity

	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	2017	2017-2050	2050	2017-2050	2050	2017-2050	2050	2017-2050	2050
<b>Counties</b>									
King County	1,723,000	732,000	2,455,000	556,000	2,278,000	729,000	2,452,000	713,000	2,436,000
	80%	84%	81%	83%	81%	83%	81%	82%	80%
Kitsap County	88,000	31,000	119,000	56,000	144,000	42,000	130,000	31,000	119,000
	33%	33%	33%	31%	32%	45%	37%	33%	33%
Pierce County	283,000	142,000	424,000	176,000	458,000	149,000	432,000	131,000	414,000
	33%	39%	35%	41%	36%	41%	35%	36%	34%
Snohomish County	307,000	157,000	464,000	171,000	477,000	152,000	458,000	161,000	467,000
	39%	37%	38%	35%	37%	36%	38%	38%	38%
<b>Equity Geographies</b>									
Census tracts greater than 50% people with low incomes	83,000	86,000	169,000	62,000	145,000	101,000	184,000	61,000	144,000
	35%	50%	41%	40%	36%	55%	43%	46%	38%
Census tracts greater than 50% people of color	365,000	215,000	580,000	154,000	518,000	222,000	586,000	194,000	559,000
	52%	63%	56%	54%	53%	63%	56%	62%	55%
<b>Region</b>	<b>2,400,000</b>	<b>1,063,000</b>	<b>3,463,000</b>	<b>958,000</b>	<b>3,359,000</b>	<b>1,072,000</b>	<b>3,472,000</b>	<b>1,036,000</b>	<b>3,436,000</b>
	<b>59%</b>	<b>60%</b>	<b>59%</b>	<b>54%</b>	<b>58%</b>	<b>61%</b>	<b>60%</b>	<b>59%</b>	<b>59%</b>

Source: PSRC

Note: Areas of moderate to very high opportunity is defined as the top 60th percentile of census tracts with respect to the opportunity index. Additional detail describing methodology for this measure can be found in Appendix C. Additional information on equity, including maps depicting areas of opportunity, can be found in Appendix H.

## Population in Areas of Higher Displacement Risk

	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	2017	2017-2050	2050	2017-2050	2050	2017-2050	2050	2017-2050	2050
<b>Counties</b>									
King County	287,000	273,000	560,000	172,000	459,000	279,000	566,000	223,000	510,000
	13%	31%	19%	26%	17%	32%	19%	25%	17%
Kitsap County	3,000	8,000	12,000	7,000	10,000	19,000	22,000	3,000	6,000
	1%	9%	3%	4%	2%	20%	6%	3%	2%
Pierce County	57,000	46,000	103,000	58,000	114,000	48,000	105,000	36,000	92,000
	7%	13%	8%	13%	9%	13%	8%	10%	8%
Snohomish County	65,000	54,000	118,000	67,000	132,000	52,000	117,000	45,000	110,000
	8%	13%	10%	14%	10%	12%	10%	11%	9%
<b>Equity Geographies</b>									
Census tracts greater than 50% people with low incomes	168,000	157,000	325,000	138,000	306,000	171,000	339,000	119,000	287,000
	70%	92%	79%	90%	78%	92%	80%	91%	77%
Census tracts greater than 50% people of color	275,000	206,000	481,000	150,000	425,000	207,000	482,000	171,000	446,000
	39%	60%	46%	53%	43%	59%	46%	55%	44%
<b>Region</b>	<b>412,000</b>	<b>381,000</b>	<b>793,000</b>	<b>304,000</b>	<b>715,000</b>	<b>398,000</b>	<b>810,000</b>	<b>306,000</b>	<b>718,000</b>
	<b>10%</b>	<b>22%</b>	<b>14%</b>	<b>17%</b>	<b>12%</b>	<b>23%</b>	<b>14%</b>	<b>17%</b>	<b>12%</b>

Source: PSRC

Note: Areas of higher displacement risk is defined as the top 10th percentile of census tracts with respect to the displacement risk analysis index. Additional detail describing methodology for this measure can be found in Appendix C. Additional information on equity, including maps depicting areas of higher displacement risk can be found in Appendix H.



PSRC

# VISION 2050



**APPENDIX C**  
**Modeling Methodology**  
**and Analysis Tools**





# Appendix C: Modeling Methodology and Analysis Tools

*This appendix provides a detailed description of the modeling process and analysis of the VISION 2050 alternatives – Preferred Growth Alternative, Stay the Course, Transit Focused Growth, and Reset Urban Growth – for this Supplemental Environmental Impact Statement (SEIS).*

Section C.1 provides an overview of models and tools used in the modeling process. Section C.2 documents key technical assumptions and methodologies used to develop and model the alternatives. Section C.3 presents the modeled data indicators used to evaluate the differential outcomes and impacts of the alternatives.

## C.1 Models and Tools

This section provides an overview of the full suite of PSRC forecasting tools used to model the VISION 2050 alternatives and generate the evaluation metrics used to analyze the alternatives.

Figure C.1-1. PSRC Model Suite



### C.1.1 Regional Macroeconomic Model and Forecast

#### Purpose

The Puget Sound Regional Macroeconomic Model was used to produce PSRC's 2018 Regional Macroeconomic Forecast, which establishes long-range regional growth assumptions for population, households, and employment out to the year 2050. The regional forecast values serve as control totals for developing the population and employment growth allocations by county and regional geography that define the alternatives. The regional forecast and subregional growth assumptions for each alternative then serve as key inputs to the UrbanSim land use model.

#### Model/Tool

The Puget Sound Regional Macroeconomic Model and 2018 Regional Macroeconomic Forecast were developed by the economic consulting firm ECONorthwest. The regional model is structured in a top-down manner, with productivity, aggregate employment, income, and

inflation forecast initially, followed by subsequent modules for demographic composition and industry detail. The model equations are estimated using over four decades of historical data. It also utilizes two key exogenous elements: a) an extension of results from the well-regarded national macroeconomic model developed and maintained by Yale University professor Ray Fair, and b) an Aerospace employment forecast based on global demand projections and labor productivity trends. The current model has been refined to better capture the effects of the demographic aging transition underway nationally and its workforce implications. The model now also includes a new housing supply module that explicitly accounts for the role of housing price in the behavior of the regional economy and demographics.

## **Key Assumptions**

The latest 2018 Regional Macroeconomic Forecast assumes:

- The region is projected to reach a total of 5.8 million people and 3.4 million jobs by the year 2050. This translates into an additional 1.8 million people and 1.2 million jobs being added to the region between 2017 and 2050.
- The jobs forecast reflects a slight upward increase from PSRC's preceding forecast (2014), attributable to the strength of the regional economy relative to the broader U.S. economy in the recovery period following the last recession.
- The population forecast reflects a more substantial upward adjustment from the previous forecast series, in part due to the higher jobs forecast but primarily due to model adjustments that better account for the relationship between job growth, the workforce population, and the aging of the boomer generation in the forthcoming decades.
- The region is projected to add 830,000 households to reach a total of 2.4 million households by the year 2050. Average household size, which has been relatively stable over the last two and a half decades, is anticipated to begin declining again as boomers age and the number of empty-nester and one-person households increases. Decreasing fertility rates also contribute to this trend. A smaller persons-per-household ratio translates into a greater demand for housing to meet the needs of a growing population.

## **C.1.2 UrbanSim Land Use Model**

### **Purpose**

PSRC used its UrbanSim model as a tool for modeling the distinct growth patterns of the alternatives at a disaggregate level. The model output supports several land use evaluation metrics used to analyze the differential impacts of each alternative. The UrbanSim output also serves as inputs to the regional travel demand model and other supplemental analyses.

### **Model/Tool**

UrbanSim is an agent-based microsimulation model that predicts land development and the location choices of households and jobs over time at the parcel level. Land development is a

function of zoned land uses, allowable densities, and market forces (e.g., demand, real estate prices, profitability of new development). Location choice decisions are simulated based on various factors that households/persons and firms/jobs consider when moving to or relocating within the region (e.g., price, building size, proximity to other types of land use, commute times).

Subregional population and employment growth allocations that define each alternative are disaggregated to individual jurisdictions and serve as UrbanSim's control totals. The model then simulates how the jurisdiction-level growth assumptions are likely to unfold at the parcel level based on the model dynamics described above.

UrbanSim is run parallel to the SoundCast travel model (described below) within an integrated model framework that incorporates feedback loops from SoundCast at selected intervals (years). The feedback loop is comprised of accessibility factors from SoundCast that are used by various UrbanSim sub-models. To learn more, visit: <https://www.psrc.org/urbansim-parcel-based-land-use-model>.

## **Key Assumptions**

Key assumptions embedded in the UrbanSim model include:

- Jurisdiction-level growth assumptions (population, households, employment) for individual cities, urban unincorporated planning areas, and rural areas serve as control totals and key demand drivers in the UrbanSim model framework. These assumptions are derived from the county and regional geography-level growth allocations for each alternative in conjunction with locally developed growth targets.
- Development parameters in the model were established based on local comprehensive plans and zoning regulations circa 2015/2016, with selected updates for major rezones. The model does not account for anticipated future plan and zoning updates, such as updates that may be expected at transit station areas to support transit-oriented development.
- Accessibility factors from the SoundCast travel model inform the location choices of households and jobs and the attractiveness of available land for development within UrbanSim.

## **C.1.3 SoundCast Travel Model**

### **Purpose**

PSRC has developed a customized set of software programs and mathematical procedures to simulate current and future travel patterns and conditions within the central Puget Sound region. These programs and procedures are collectively referred to as the "SoundCast regional travel demand forecasting model" or simply as the "SoundCast travel model." The travel model produces detailed spatial and network data that are used to analyze how the region's transportation infrastructure and environment are likely to be impacted by future growth and development as represented by the VISION 2050 growth alternatives. Model outputs are useful for identifying differences in alternative performance, but do not fully predict

future behavior. Selected travel model outputs also serve as inputs to both UrbanSim and the regional air quality model and analysis.

## **Model/Tool**

PSRC used its SoundCast travel model to analyze the transportation-related impacts of the growth alternatives. SoundCast is an activity-based model which represents how individual people travel to conduct their daily activities, as compared to the previous zone-based model which aggregately represented trips between zones. As an activity-based model, SoundCast allows for improved representation of travel behavior as well as greater temporal and spatial resolution to better evaluate the impacts of alternative land use and development patterns. To learn more, visit: <https://www.psrc.org/activity-based-travel-model-soundcast>.

The current SoundCast model operates on a 2014 base year, with key variables validated against PSRC's 2014 Regional Household Travel Survey. The analysis of alternatives is not significantly impacted by the base year being in 2014 (versus 2017) since any differences would be small compared to the expected change by the year 2050.

## **Key Assumptions**

The key input assumptions for any travel demand analysis framework include a set of land use growth allocations (representing demand conditions) along with transportation projects, policies, and network attributes (representing supply conditions):

- For the travel demand analysis conducted on the growth alternatives, parcel-level population, household, and employment outputs from the UrbanSim model for each of the alternatives comprise the key land use assumptions.
- The set of transportation projects and policies enumerated in the [2018 Regional Transportation Plan](#) provide the future (year 2040) transportation network assumptions used by SoundCast for this analysis.

## **Limitations of the Model**

SoundCast is estimated using transportation mode choice data from PSRC's 2014 Regional Household Travel Survey. However, bus rapid transit and light rail services in the Puget Sound region are still in their infancy and available survey data may not yet fully predict user behavior in response to high-capacity transit. Additionally, future planning and improvements that may occur to make stations more accessible are not accounted for in the model. Subarea planning, local street improvements, and supportive bus service may be employed at stations to enhance performance. Local planning and improvements are likely to result in greater transit ridership at station areas than reported in the modeling results.

## **C.1.4. MOVES Mobile Source Emissions Model**

### **Purpose**

The air quality model estimates future regional motor vehicle emissions of criteria pollutants and greenhouse gases. The analysis combines mobile source emissions factors from the U.S.

Environmental Protection Agency’s latest Motor Vehicle Emission Simulator (MOVES) model and output from the travel demand model, including link-specific vehicle miles traveled and vehicle speed.

## **Model/Tool**

PSRC used the most recent version of the MOVES model, [MOVES2014a](#), to develop emissions factors used to conduct the air quality analysis of the alternatives. The MOVES2014a model represents EPA’s most up-to-date assessment of on-road mobile source emissions, including incorporation of the most current vehicle, fuel, and emissions standards and new and updated emissions data from a variety of test programs and other resources. Metropolitan planning organizations are required to use this updated tool for regional emissions analyses for transportation conformity determinations.

## **Key Assumptions**

The assumptions underlying the air quality analysis are as follows:

- The fleet mix and age distribution from the base year are used.
- The model accounts for the phase-in of current emissions standards, inspection/maintenance programs, fuel standards, and engine technology, and contains assumptions regarding the rate of vehicle changeout and fleet turnover for each forecast year.
- The model does not predict future changes in regulations or technological advances, and PSRC does not make any additional assumptions about the future vehicle fleet inputs to the model.

# **C.2 Modeling the VISION 2050 Alternatives**

The VISION 2050 alternatives represent distinct patterns of future growth. The alternatives were designed to allow this environmental analysis to consider the effects of extending the current growth strategy to 2050 and the potential impacts of adjustments to that strategy. This section describes the key technical assumptions and methodologies applied in developing and modeling the alternatives. For a full description of the VISION 2050 alternatives, see Chapter 3 – Alternatives Evaluated.

## **C.2.1 Key Technical Assumptions**

### **Regional Growth Assumptions**

Future assumptions of regional population and employment growth for the 2017 to 2050 planning period—1.8 million additional people and 1.2 million additional jobs—were held constant under all alternatives. These growth assumptions were derived from PSRC’s 2018 Regional Macroeconomic Forecast.

Table C.2-1. Regional Population and Employment Growth Assumptions

	Forecast Growth 2017-2050
Regional Population	1,756,000
Regional Employment	1,158,000

### County Growth Shares

The distribution of forecast population and employment growth across the region’s four counties represents another important technical assumption applied in developing the alternatives.

**Stay the Course.** The Stay the Course (no action) alternative, by definition, uses county population and employment growth shares from the adopted VISION 2040 Regional Growth Strategy. The VISION 2040 county growth shares, which are for the 2000 to 2040 time period, were applied to regional growth assumptions from the 2018 Macroeconomic Forecast for an extended 2000 to 2050 time frame, then adjusted to account for the growth that has already occurred from 2000 through 2017.

The resulting county growth shares for the 2017 to 2050 period represent what is needed for the region to achieve the desired distribution of population and employment growth across counties by the year 2050 *as expressed in the current strategy*. In other words, if a county grew faster or slower over the past 17 years than envisioned by the current strategy, then its 2017 to 2050 growth share rebalances the county’s trajectory to achieve the 2050 goal based on a 2000 to 2050 timeframe.

Table C.2-2. County Population and Employment Growth Shares – Stay the Course

	Population			Employment		
	VISION 2040	Stay the Course		VISION 2040	Stay the Course	
	% Share 2000-2040	% Share 2017-2050	Growth 2017-2050	% Share 2000-2040	% Share 2017-2050	Growth 2017-2050
King County	42%	38%	661,000	57%	57%	662,000
Kitsap County	9%	11%	189,000	5%	6%	66,000
Pierce County	23%	24%	426,000	17%	17%	203,000
Snohomish County	26%	27%	480,000	20%	20%	228,000
Region	100%	100%	1,756,000	100%	100%	1,158,000

**Action Alternatives.** The county growth shares in the adopted Regional Growth Strategy were developed using trend data and forecasts circa 2005/06. Recognizing that these assumptions warranted reevaluation, PSRC reviewed a range of available data resources to establish a revised set of baseline county growth shares for the Transit Focused Growth, Reset Urban Growth, and Preferred Growth action alternatives. These assumptions were discussed and vetted with PSRC’s Land Use Technical Advisory Committee.

**Population.** To update county population growth assumptions, PSRC turned to the Washington Office of Financial Management’s (OFM) 2017 Supplemental Population Projections, which extended the latest Growth Management Act (GMA) Population Projections for Counties from 2040 out to 2050. Counties are required under the state GMA to plan for future growth using OFM projections; therefore, they are a widely recognized and relevant forecast resource to inform VISION 2050.

PSRC derived 2017 to 2050 county percent growth shares from OFM’s supplemental population projections (Medium series) and applied them to the regional population growth assumptions from PSRC’s Macroeconomic Forecast to arrive at the 2017 to 2050 county population growth assumptions used in the Transit Focused Growth, Reset Urban Growth, and Preferred Growth alternatives.

**Table C.2-3. County Population Growth Shares by Alternative**

	Stay the Course		Action Alternatives	
	% Share 2017-2050	Growth 2017-2050	% Share 2017-2050	Growth 2017-2050
King County	38%	661,000	50%	872,000
Kitsap County	11%	189,000	5%	97,000
Pierce County	24%	426,000	21%	364,000
Snohomish County	27%	480,000	24%	424,000
Region	100%	1,756,000	100%	1,756,000

The revised baseline county population growth assumptions used in the action alternatives redistribute a substantial share of future growth into King County (+211,000) when compared to allocations under Stay the Course, primarily from Kitsap County (-93,000), but also from Pierce County (-63,000) and Snohomish County (-56,000). These assumptions were compared to and evaluated for reasonableness against several historical reference data points and were determined to be realistic.

**Table C.2-4. Actual and Forecast County Population Growth Shares**

	Actual			VISION 2040	Action Alternatives
	% Share 1990-2017	% Share 2000-2017	% Share 2010-2017	% Share 2000-2040	% Share 2017-2050
King County	49%	53%	59%	42%	50%
Kitsap County	6%	4%	4%	9%	5%
Pierce County	21%	20%	17%	23%	21%
Snohomish County	25%	23%	20%	26%	24%
Region	100%	100%	100%	100%	100%

**Employment.** On the employment side, with no comparable forecast resource available, PSRC chose to use county-level population-to-job ratios derived from present conditions to convert the revised baseline county population assumptions to employment. This approach assumes the current distributional pattern of population and jobs across the region today will carry into the future.

PSRC boards and committees provided guidance that the employment shares should be further adjusted to encourage additional employment growth in Kitsap, Pierce, and Snohomish counties to promote a better balance of jobs and housing across the region. As a result, the final version of the county employment growth shares in the action alternatives reflects a 5 percentage point shift of regional employment from King County to Kitsap (+1 percentage point), Pierce (+2 percentage points), and Snohomish (+2 percentage points) counties. The development of the VISION 2040 Regional Growth Strategy included a similar adjustment for population and employment to support a better balance across the counties. The final revised county growth assumptions used in the action alternatives result in greater improvement in the balance of jobs and housing across the region’s counties by 2050 relative to Stay the Course.

**Table C.2-5. County Employment Growth Shares by Alternative**

	Stay the Course		Action Alternatives	
	% Share 2017-2050	Growth 2017-2050	% Share 2017-2050	Growth 2017-2050
King County	57%	662,000	59%	682,000
Kitsap County	6%	66,000	5%	57,000
Pierce County	17%	203,000	17%	195,000
Snohomish County	20%	228,000	19%	225,000
Region	100%	1,158,000	100%	1,158,000

The updated county employment growth assumptions for the 2017 to 2050 period were determined to be consistent with historical trends as well as with the subregional forecast assumptions used to develop the VISION 2040 Regional Growth Strategy for employment.

**Table C.2-6. Actual and Forecast County Employment Growth Shares**

	Actual			VISION 2040	New Baseline	Action Alternatives
	% Share 1990-2017	% Share 2000-2017	% Share 2010-2017	% Share 2000-2040	% Share 2017-2050	% Share 2017-2050
King County	N/A	57%	73%	57%	64%	59%
Kitsap County	N/A	4%	2%	5%	4%	5%
Pierce County	N/A	17%	11%	17%	15%	17%
Snohomish County	N/A	22%	14%	20%	17%	19%
Region	N/A	100%	100%	100%	100%	100%

**Regional Geographies.** Regional geographies provide a central organizing framework for the Regional Growth Strategy, in which cities, unincorporated urban communities, rural areas, and resource lands are classified according to the roles each are expected to play in accommodating future growth and implementing the strategy.

VISION 2040 defines regional geography classifications for cities based on the presence of regional growth centers and jurisdictional size. Since VISION 2040 was adopted, eight cities have been reclassified from Small Cities to Larger Cities. City reclassifications and member feedback about the geographies generated significant board discussion about the criteria and expectations for different types of places and prompted a new look at definitions of regional geographies for the VISION 2050 update.

Based on scoping comments and direction from the Growth Management Policy Board, PSRC developed an updated classification of cities and unincorporated urban areas. Changes are intended to clarify distinctions between places based on access to high-capacity transit. For urban unincorporated areas, planning status regarding annexation or incorporation is also taken into account.

The VISION 2050 Preferred Growth Alternative uses the revised classification system presented in the table below to express how county population and employment growth allocations are distributed across the region. In the Stay the Course, Transit Focused Growth, and Reset Urban Growth alternatives, jurisdictions marked with a double asterisk are classified as Urban Unincorporated.

**Table C.2-7. VISION 2050 Regional Geographies – Preferred Growth Alternative**

<b>Metropolitan Cities</b>   Central cities in the county that serve as civic, cultural, economic and transportation hubs and have at least one regional growth center				
Bellevue	Bremerton & UGA**	Everett	Seattle	Tacoma
<b>Core Cities</b>   Major cities and urban areas with transit and designated regional growth centers				
Auburn Bothell Burien Federal Way	Issaquah Kent Kirkland	Lakewood Lynnwood Puyallup	Redmond Renton SeaTac	Silverdale Tukwila University Place
<b>High-Capacity Transit (HCT) Communities</b>   Other cities and unincorporated urban areas (planned for annexation or incorporation) with high-capacity transit. High-capacity transit is defined as existing or planned light rail, commuter rail, ferry, streetcar, and/or bus rapid transit.				
Arlington Bainbridge Island Bothell MUGA Des Moines DuPont Edmonds Edmonds MUGA Everett MUGA	Federal Way PAA Fife Fircrest Kenmore Kingston** Lake Forest Park Larch Way Overlap Lynnwood MUGA	Marysville Mercer Island Mill Creek Mill Creek MUGA Mountlake Terrace Mukilteo Mukilteo MUGA Newcastle	North Highline Parkland-Spanaway- Midland PAA** Pierce Mid-County (Part)** Port Orchard & UGA** Poulsbo & UGA** Renton PAA	Shoreline South Hill PIA** Sumner Tacoma PAA Woodinville

Table C.2-7. VISION 2050 Regional Geographies – Preferred Growth Alternative  
(continued)

<b>Cities &amp; Towns</b>   Cities and towns with local transit access or without fixed-route transit				
Algona	Covington	Hunts Point	Orting	Stanwood
Beaux Arts	Darrington	Index	Pacific	Steilacoom
Black Diamond	Duvall	Lake Stevens	Roy	Sultan
Bonney Lake	Eatonville	Maple Valley	Ruston	Wilkeson
Brier	Edgewood	Medina	Sammamish	Woodway
Buckley	Enumclaw	Milton	Skykomish	Yarrow Point
Carbonado	Gig Harbor	Monroe	Snohomish	
Carnation	Gold Bar	Normandy Park	Snoqualmie	
Clyde Hill	Granite Falls	North Bend	South Prairie	
<b>Urban Unincorporated Areas</b>   Urban unincorporated areas without high-capacity transit and/or not affiliated for annexation or planned for incorporation				
All Remaining Urban Unincorporated Areas				
<b>Rural</b>   Designated rural lands				
All Designated Rural Areas				
<b>Resource Lands*</b>   Designated agricultural, mineral, and forest resource lands				
All Designated Resource Lands				
<b>Indian Reservation Lands*</b>   Permanent homelands of tribal nations designated through treaty, Executive, or Congressional Acts				
Muckleshoot Indian Reservation, Nisqually Indian Reservation, Port Gamble Indian Reservation (Port Gamble S’Klallam Tribe), Port Madison Reservation (Suquamish Tribe), Puyallup Indian Reservation, Sauk-Suiattle Indian Reservation, Snoqualmie Indian Reservation, Stillaguamish Indian Reservation, Tulalip Indian Reservation				
<b>Major Military Installations*</b>   Installations with more than 5,000 enlisted and service personnel				
Joint Base Lewis McChord Naval Base Kitsap – Bangor Naval Base Kitsap – Bremerton Naval Station Everett				

Source: PSRC

MUGA = Municipal Urban Growth Area; PAA = Potential Annexation Area; PIA = Planned Incorporation Area; \* = Geography not allocated forecasted regional growth; \*\* = Classified as Urban Unincorporated Areas under the Stay the Course, Transit Focused Growth, and Reset Urban Growth alternatives

See Table 3.1-2 in Chapter 3 for the regional geography classifications used in the Stay the Course, Transit Focused Growth, and Reset Urban Growth alternatives.

VISION 2050 establishes Resource Lands, Major Military Installations, and Indian Reservation Lands as regional geographies for the purpose of recognizing and mapping these places of significance within the region, but they are not allocated specific levels of new growth under the Regional Growth Strategy.

## C.2.2 Stay the Course (No Action) Alternative

The Stay the Course Alternative is a direct extension of the VISION 2040 Regional Growth Strategy and assumes a compact growth pattern, focused in the largest and most transit-connected cities in the region and within the region’s 29 designated regional growth centers. The alternative serves as the required “no action alternative” that must be evaluated in accordance with SEPA.

Stay the Course continues to direct the largest shares of the region’s future growth to the region’s five major Metropolitan Cities—Seattle, Bellevue, Everett, Bremerton and Tacoma. Growth is also focused into the region’s Core Cities—other cities with regional growth centers that are regional concentrations of growth and serve as economic and transportation hubs for the region. Compared to historical trends, this alternative allocates less growth in urban unincorporated and rural areas and more growth in cities.

## Methodology

The Stay the Course Alternative is developed using the current Regional Growth Strategy’s assumed distribution of future growth across counties and regional geographies. First, VISION 2040 population and employment growth shares for the 2000 to 2040 time frame were applied to regional growth assumptions derived from PSRC’s Macroeconomic Forecast for an extended 50-year time frame out to 2050. Then, the 2000 to 2050 growth allocations for counties and regional geographies were adjusted to subtract outgrowth that already occurred between 2000 and 2017.

Figure C.2-1. Stay the Course Methodology



In regional geographies where actual 2000 to 2017 growth was greater than the 2000 to 2050 growth allocation, the 2017 to 2050 allocation was reset from the negative value to zero and the remaining shortfall was proportionally distributed across other regional geographies within the county. The resulting growth assumptions for the remaining 2017 to 2050 period represent what is needed for the region to achieve the desired development pattern expressed in the current growth strategy by the year 2050 starting from a 2000 base year.

Table C.2-8. 2017-2050 Population and Employment Growth Allocations – Stay the Course

POPULATION	Metro Cities	Core Cities	HCT Comm	Cities & Towns	Urban Uninc	Rural	Total
King County	39% (259,000)	41% (272,000)	9% (58,000)	8% (53,000)	0% (0)	3% (18,000)	100% (661,000)
Kitsap County	29% (54,000)	15% (28,000)	29% (55,000)	N/A N/A	16% (31,000)	11% (21,000)	100% (189,000)
Pierce County	41% (174,000)	31% (134,000)	6% (26,000)	11% (48,000)	8% (33,000)	3% (11,000)	100% (426,000)
Snohomish County	25% (120,000)	11% (54,000)	35% (169,000)	13% (61,000)	7% (32,000)	9% (44,000)	100% (480,000)
Region	35% (608,000)	28% (488,000)	18% (308,000)	9% (162,000)	5% (96,000)	5% (95,000)	100% (1,756,000)
EMPLOYMENT	Metro Cities	Core Cities	HCT Comm	Cities & Towns	Urban Uninc	Rural	Total
King County	42% (280,000)	48% (317,000)	6% (38,000)	4% (24,000)	0% (1,000)	0% (3,000)	100% (662,000)
Kitsap County	31% (20,000)	26% (17,000)	26% (17,000)	N/A N/A	14% (9,000)	3% (2,000)	100% (66,000)
Pierce County	56% (113,000)	22% (45,000)	10% (19,000)	5% (9,000)	5% (11,000)	2% (4,000)	100% (203,000)
Snohomish County	42% (96,000)	15% (34,000)	26% (58,000)	10% (22,000)	5% (12,000)	2% (5,000)	100% (228,000)
Region	44% (509,000)	36% (413,000)	12% (133,000)	5% (55,000)	3% (33,000)	1% (14,000)	100% (1,158,000)

Some counties and regional geographies have been growing faster or slower than VISION 2040 assumed. The following charts illustrate how the Stay the Course Alternative accounts for the lesser or extra amount of growth needed between 2017 and 2050 to ultimately achieve the VISION 2040 growth shares by 2050.

Figure C.2-2. Regional Growth Strategy for Population vs. Growth Trends vs. Stay the Course

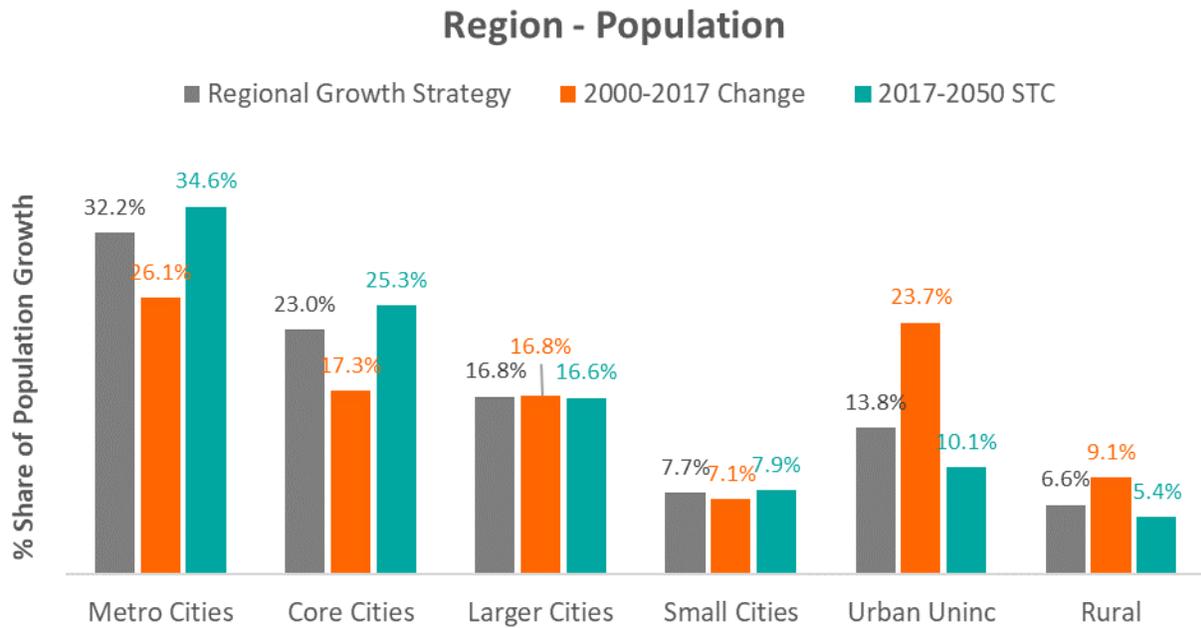
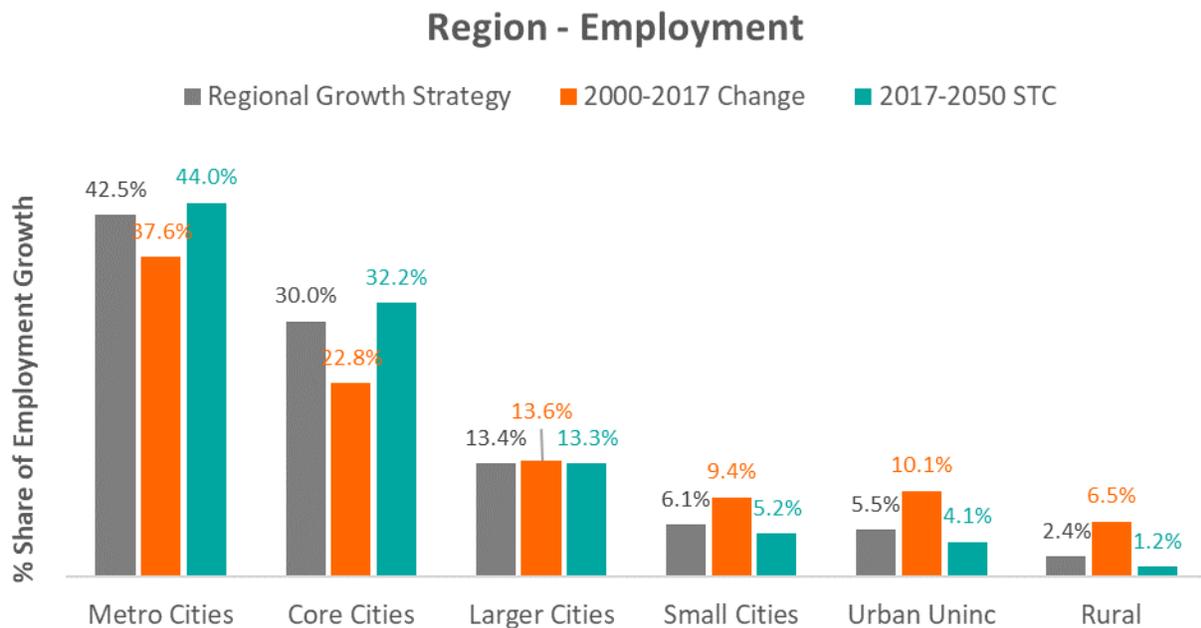


Figure C.2-3. Regional Growth Strategy for Employment vs. Growth Trends vs. Stay the Course



The Regional Growth Strategy Background Paper (PSRC 2018a) provides more information on growth trends for individual regional geographies, regionally and by county, in comparison to the policy goals of the adopted strategy.

**Regional Geographies in Stay the Course.** PSRC developed preliminary Stay the Course growth allocations based on VISION 2040 regional geographies in which places are classified as Metropolitan Cities, Core Cities, Larger Cities (cities with combined population and employment of 22,500 or higher), Small Cities (cities with population and employment less than 22,500), Unincorporated Urban Growth Areas, and Rural.

For purposes of this environmental analysis and to facilitate comparability across the alternatives, Stay the Course—as presented in Table C.2-8 above—was translated into the revised VISION 2050 regional geographies classification system. To model the Stay the Course Alternative, PSRC developed jurisdiction-level growth assumptions based on VISION 2040 regional geographies. (This process is discussed in more detail in Section C.2.6 Modeling the Alternatives in UrbanSim – Jurisdiction-Level Control Totals). The jurisdiction-level model inputs, as well as all subsequent model outputs, were then reaggregated for reporting purposes using the revised regional geographies.

For comparison purposes, Stay the Course growth allocations using the VISION 2040 regional geographies are provided in the table below.

**Table C.2-9. 2017-2050 Population and Employment Growth Allocations by VISION 2040 Regional Geography – Stay the Course**

<b>POPULATION</b>	<b>Metro Cities</b>	<b>Core Cities</b>	<b>Larger Cities</b>	<b>Small Cities</b>	<b>Urban Uninc</b>	<b>Rural</b>	<b>Total</b>
King County	39% (259,000)	38% (254,000)	16% (104,000)	4% (25,000)	0% (0)	3% (18,000)	100% (661,000)
Kitsap County	29% (54,000)	15% (28,000)	11% (20,000)	18% (35,000)	16% (31,000)	11% (21,000)	100% (189,000)
Pierce County	41% (174,000)	26% (109,000)	11% (47,000)	11% (48,000)	9% (37,000)	3% (11,000)	100% (426,000)
Snohomish County	25% (120,000)	11% (54,000)	25% (122,000)	6% (31,000)	23% (109,000)	9% (44,000)	100% (480,000)
Region	35% (608,000)	25% (445,000)	17% (292,000)	8% (139,000)	10% (177,000)	5% (95,000)	100% (1,756,000)
<b>EMPLOYMENT</b>	<b>Metro Cities</b>	<b>Core Cities</b>	<b>Larger Cities</b>	<b>Small Cities</b>	<b>Urban Uninc</b>	<b>Rural</b>	<b>Total</b>
King County	42% (280,000)	43% (282,000)	12% (79,000)	3% (17,000)	0% (2,000)	0% (3,000)	100% (662,000)
Kitsap County	31% (20,000)	26% (17,000)	6% (4,000)	20% (13,000)	14% (9,000)	3% (2,000)	100% (66,000)
Pierce County	56% (113,000)	20% (40,000)	8% (16,000)	8% (17,000)	6% (12,000)	2% (4,000)	100% (203,000)
Snohomish County	42% (96,000)	15% (34,000)	24% (55,000)	6% (13,000)	11% (25,000)	2% (5,000)	100% (228,000)
Region	44% (509,000)	32% (373,000)	13% (154,000)	5% (60,000)	4% (48,000)	1% (14,000)	100% (1,158,000)

**Regional Growth Strategy Adjustments.** The VISION 2040 Regional Growth Strategy was adopted by the PSRC General Assembly in April 2008, and has since been updated by the Executive Board via a series of technical amendments to reflect annexations, urban growth area boundary adjustments, and city reclassifications. For purposes of developing the Stay the Course Alternative, the current Regional Growth Strategy was adjusted to reflect additional annexations and boundary changes through April 2017, as well as the reclassifications of Bonney Lake, Covington, and Lake Stevens from the Small Cities to Larger Cities category.

The Executive Board has also designated new regional growth centers in the cities of Issaquah and University Place since VISION 2040 was adopted, but the board has not yet formally reclassified those jurisdictions as Core Cities. Issaquah and University Place are reported with other Core Cities in all alternatives to reflect their future planning role in implementing VISION 2050, but Stay the Course assumes levels of growth for these cities based on their adopted classification as Larger Cities.

### **C.2.3 Transit Focused Growth Alternative**

The Transit Focused Growth Alternative represents a compact growth pattern based on the VISION 2040 Regional Growth Strategy that assumes accelerated growth near the region's existing and planned transit investments. The alternative has an explicit goal for 75 percent of the region's population and employment growth to occur within regional growth centers and areas in proximity to current and planned investments in high-capacity transit, including light rail, bus rapid transit, commuter rail, ferries, and streetcar. Transit Focused Growth directs the largest shares of growth to Metropolitan Cities, Core Cities, and HCT Communities, and assumes a greater role for areas served by high-capacity transit outside of Metropolitan and Core cities. The remaining balance of growth is distributed largely within the urban growth area among areas not served by high-capacity transit. Growth in Rural and Urban Unincorporated areas is the lowest in this alternative.

Unlike Stay the Course, this alternative uses the revised county growth distributions discussed in the County Growth Shares – Action Alternatives section (Section C.2.1) above, which assumes higher levels of (primarily population) growth in King County and comparatively lower shares of growth to Kitsap, Pierce, and Snohomish counties. It also reflects greater improvement in the balance of jobs and housing across the region's counties by 2050 relative to Stay the Course.

### **Methodology**

The methodology for developing the Transit Focused Growth Alternative begins with Stay the Course 2017-2050 population and employment growth allocations for regional geographies at the regional summary level. Transit Focused Growth pivots off Stay the Course by shifting additional growth to Metropolitan Cities, Core Cities, and HCT Communities from Cities and Towns, Urban Unincorporated, and Rural areas.

**Table C.2-10. 2017-2050 Population and Employment Growth Allocations – Regional Geography**

<b>POPULATION</b>	<b>Metro Cities</b>	<b>Core Cities</b>	<b>HCT Comm</b>	<b>Cities &amp; Towns</b>	<b>Urban Uninc</b>	<b>Rural</b>	<b>Total</b>
Stay the Course	35%	28%	18%	9%	5%	5%	100%
Transit Focused Growth	36%	29%	23%	6%	4%	2%	100%
<b>EMPLOYMENT</b>	<b>Metro Cities</b>	<b>Core Cities</b>	<b>HCT Comm</b>	<b>Cities &amp; Towns</b>	<b>Urban Uninc</b>	<b>Rural</b>	<b>Total</b>
Stay the Course	44%	36%	12%	5%	3%	1%	100%
Transit Focused Growth	44%	36%	12%	4%	2%	1%	100%

As mentioned above, the Transit Focused Growth Alternative also uses a revised set of assumptions regarding how regional population and employment growth is distributed among the region’s counties. The initial calculations use the revised baseline county employment shares (discussed in Section C.2.1) without the 5 percentage point jobs shift to improve the balance of jobs and housing across counties.

**Table C.2-11. 2017-2050 Population and Employment Growth Allocations – County**

<b>POPULATION</b>	<b>King County</b>	<b>Kitsap County</b>	<b>Pierce County</b>	<b>Snohomish County</b>	<b>Total</b>
Stay the Course	38%	11%	24%	27%	100%
Transit Focused Growth	50%	5%	21%	24%	100%
<b>EMPLOYMENT</b>	<b>King County</b>	<b>Kitsap County</b>	<b>Pierce County</b>	<b>Snohomish County</b>	<b>Total</b>
Stay the Course	57%	6%	17%	20%	100%
Transit Focused Growth	64%	4%	15%	17%	100%

Regional population and employment growth for the 2017 to 2050 period is first apportioned to counties and regional geographies (at the regional summary level) based on the shares established above. To further allocate growth across regional geographies at the county level, the methodology sought to account for the unique role regional geographies play within each county. For example, Core Cities today account for a substantially greater share of total population in King County (33 percent) than in Pierce County (17 percent) and especially Kitsap and Snohomish counties (7 percent).

The methodology uses current (2017) distributions of population and employment by county regional geography as a proxy for the distinct development patterns that characterize each county in terms of its regional geographies. An iterative proportional fitting process was then applied to adjust the 2017 population and employment distributions to match the county and regional geography growth allocations established in the preceding step.

Figure C.2-4. Iterative Proportional Fitting Process

POPULATION	Metro Cities	Core Cities	HCT Comm	Cities & Towns	Urban Uninc	Rural	Total
King County	2017 pop	2017 pop	2017 pop	2017 pop	2017 pop	2017 pop	50%
Kitsap County	2017 pop	2017 pop	2017 pop	2017 pop	2017 pop	2017 pop	5%
Pierce County	2017 pop	2017 pop	2017 pop	2017 pop	2017 pop	2017 pop	21%
Snohomish County	2017 pop	2017 pop	2017 pop	2017 pop	2017 pop	2017 pop	24%
<b>Total</b>	<b>36%</b>	<b>29%</b>	<b>23%</b>	<b>6%</b>	<b>4%</b>	<b>2%</b>	<b>1,756,000</b>

Selected manual adjustments were made to the employment growth allocations to better reflect the intended policy goals of the Transit Focused Growth Alternative. And in one last step, the 5 percentage point jobs shift across counties was implemented, which shifts more future job growth to Kitsap, Pierce, and Snohomish counties from King County.

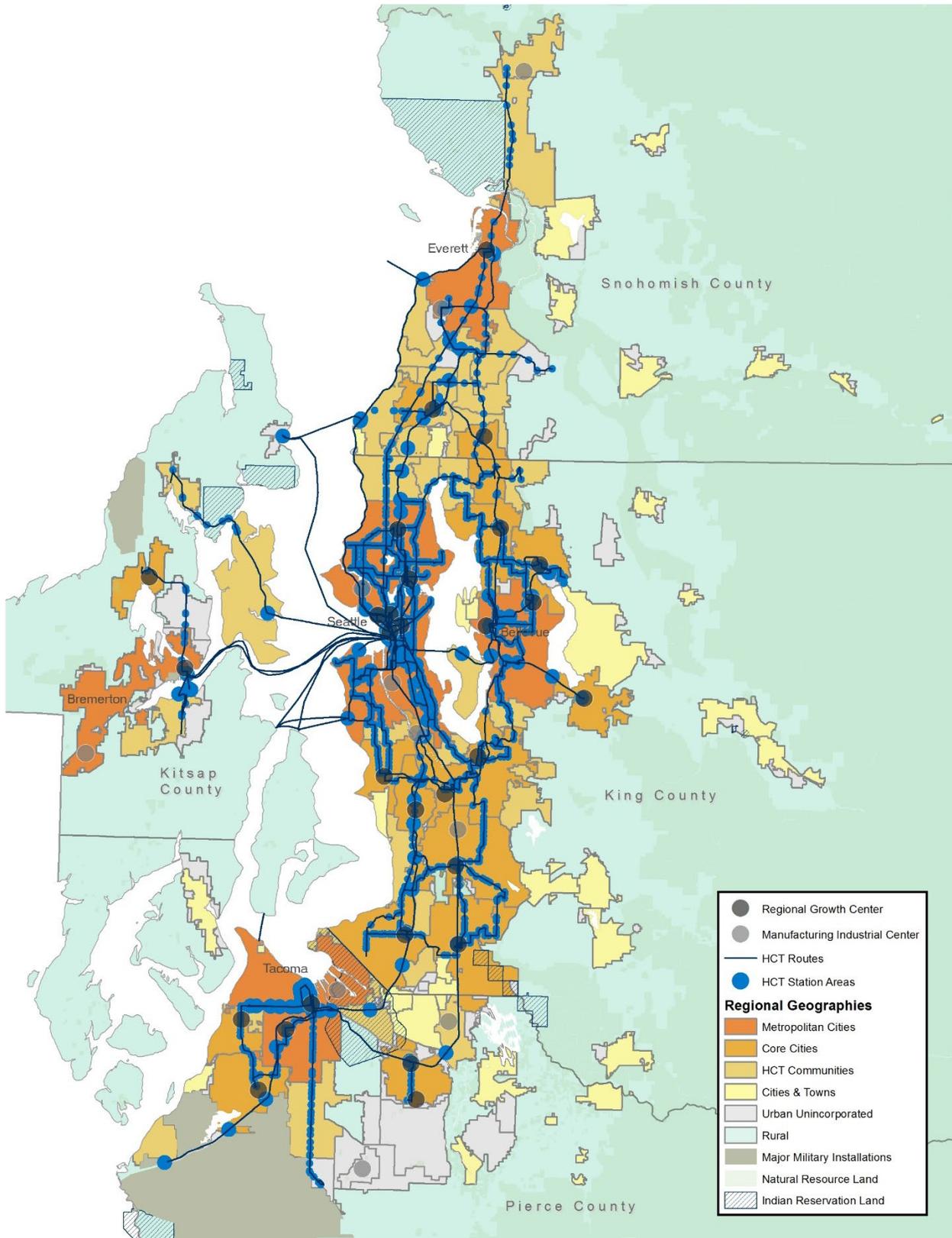
Table C.2-12. 2017-2050 Population and Employment Growth Allocations – Transit Focused Growth

POPULATION	Metro Cities	Core Cities	HCT Comm	Cities & Towns	Urban Uninc	Rural	Total
King County	44%	40%	11%	5%	0%	1%	100%
	(381,000)	(346,000)	(92,000)	(44,000)	(4,000)	(6,000)	(872,000)
Kitsap County	32%	16%	30%	N/A	15%	8%	100%
	(30,000)	(15,000)	(29,000)	N/A	(14,000)	(8,000)	(97,000)
Pierce County	37%	28%	14%	7%	11%	3%	100%
	(134,000)	(101,000)	(52,000)	(25,000)	(41,000)	(11,000)	(364,000)
Snohomish County	20%	11%	54%	9%	3%	2%	100%
	(87,000)	(47,000)	(231,000)	(37,000)	(12,000)	(10,000)	(424,000)
Region	36%	29%	23%	6%	4%	2%	100%
	(632,000)	(509,000)	(404,000)	(105,000)	(70,000)	(35,000)	(1,756,000)
EMPLOYMENT	Metro Cities	Core Cities	HCT Comm	Cities & Towns	Urban Uninc	Rural	Total
King County	46%	45%	6%	3%	0%	0%	100%
	(311,000)	(310,000)	(40,000)	(18,000)	(1,000)	(3,000)	(682,000)
Kitsap County	33%	26%	29%	N/A	6%	5%	100%
	(19,000)	(15,000)	(17,000)	N/A	(4,000)	(3,000)	(57,000)
Pierce County	48%	23%	13%	6%	8%	2%	100%
	(94,000)	(44,000)	(26,000)	(13,000)	(15,000)	(3,000)	(195,000)
Snohomish County	39%	17%	30%	8%	3%	2%	100%
	(89,000)	(39,000)	(68,000)	(18,000)	(7,000)	(4,000)	(225,000)
Region	44%	35%	13%	4%	2%	1%	100%
	(513,000)	(407,000)	(151,000)	(49,000)	(27,000)	(13,000)	(1,158,000)

**Centers and Transit Station Areas.** In addition to directing a greater share of future growth to Metropolitan Cities, Core Cities, and HCT Communities, the Transit Focused Growth Alternative has an explicit goal of directing 75 percent of the region’s anticipated population and employment growth to regional growth centers and areas served by existing and planned high-capacity transit investments. These station locations are identified in the 2018 Regional Transportation Plan and are based on the long-range plans adopted by transit agencies.

High-capacity transit station areas are defined as parcels within a half-mile walk of existing/planned light rail and streetcar stations, commuter rail stations, and ferry terminals in the region’s designated urban growth areas (UGA), and within a quarter-mile walk of existing/planned bus rapid transit stations in the UGA. Parcels are selected using transportation network-based distances. That is, half- and quarter-mile distances from transit stations are measured using existing street network walking distances. These station areas are likely to see future planning changes and access improvements that expand the half- and quarter-mile walksheds and which are not accounted for in the modeling analysis of the Transit Focused Growth Alternative.

Figure C.2-5. High-Capacity Transit Station Areas – Transit Focused Growth



## **C.2.4 Reset Urban Growth Alternative**

The Reset Urban Growth Alternative is based on VISION 2040 and shares similarities with actual growth patterns that occurred from 2000 to 2017 with a more distributed growth pattern throughout the urban area. Reset Urban Growth continues to allocate the largest shares of growth to Metropolitan Cities and Core Cities and follows a pattern similar to Stay the Course, although the overall growth to Metropolitan Cities, Core Cities, and HCT Communities is less compared to Stay the Course or Transit Focused Growth. Growth in Rural and Urban Unincorporated areas is the highest in this alternative.

This alternative uses the revised county growth distributions discussed in the County Growth Shares – Action Alternatives section (Section C.2.1). The revised county assumptions direct higher levels of (primarily population) growth to King County from the region’s other counties. The future balance of jobs and housing across the region’s counties shows greater improvement compared to Stay the Course.

### **Methodology**

The Reset Urban Growth Alternative begins by allocating 2017 to 2050 forecast regional population and employment growth down to counties using the revised baseline county growth shares discussed in the County Growth Shares – Action Alternatives section. The 5 percentage point jobs shift to improve the balance of jobs and housing across counties is not applied in this initial step. The methodology then uses VISION 2040 population and employment growth shares to further disaggregate the county allocations down to regional geographies.

The key ramification of this approach compared to Stay the Course is that, by the year 2050, regional geographies that grew faster over the last seventeen years (2000 to 2017) than assumed under VISION 2040 would absorb a greater share of the region’s growth than called for by the current Regional Growth Strategy, and regional geographies that grew slower would capture a smaller share. The difference can be pronounced for certain regional geographies. The revised baseline county growth shares can accentuate this effect on growth allocations for some regional geographies, while dampening it in others.

Table C.2-13. 2017-2050 Population and Employment Growth Allocations –  
Reset Urban Growth (Preliminary)

POPULATION	Metro Cities	Core Cities	HCT Comm	Cities & Towns	Urban Uninc	Rural	Total
King County	41% (355,000)	38% (332,000)	10% (84,000)	8% (74,000)	0% (3,000)	3% (24,000)	100% (872,000)
Kitsap County	26% (25,000)	13% (12,000)	29% (28,000)	N/A N/A	16% (15,000)	16% (15,000)	100% (97,000)
Pierce County	32% (118,000)	26% (94,000)	7% (27,000)	11% (41,000)	17% (62,000)	6% (22,000)	100% (364,000)
Snohomish County	20% (86,000)	9% (38,000)	40% (170,000)	12% (52,000)	8% (36,000)	10% (43,000)	100% (424,000)
Region	33% (583,000)	27% (477,000)	18% (309,000)	10% (167,000)	7% (116,000)	6% (104,000)	100% (1,756,000)
EMPLOYMENT	Metro Cities	Core Cities	HCT Comm	Cities & Towns	Urban Uninc	Rural	Total
King County	45% (331,000)	44% (328,000)	6% (42,000)	4% (29,000)	1% (4,000)	1% (5,000)	100% (740,000)
Kitsap County	28% (13,000)	23% (11,000)	28% (12,000)	N/A N/A	13% (6,000)	8% (3,000)	100% (45,000)
Pierce County	46% (79,000)	23% (39,000)	13% (23,000)	7% (12,000)	9% (15,000)	3% (6,000)	100% (172,000)
Snohomish County	37% (75,000)	14% (29,000)	28% (56,000)	9% (19,000)	6% (13,000)	5% (10,000)	100% (202,000)
Region	43% (497,000)	35% (406,000)	11% (133,000)	5% (60,000)	3% (37,000)	2% (25,000)	100% (1,158,000)

The methodology then resets the growth allocations for the Cities and Towns and Urban Unincorporated regional geographies using Buildable Lands capacity estimates factored upward by a 10 percent margin. The 10 percent capacity increase assumes that, over the 30-year VISION 2050 planning horizon, these regional geographies are likely to see some limited amount of redevelopment and/or upzones that would increase local development capacities beyond what was assumed in each county’s most recent Buildable Lands analysis.

Table C.2-14. Buildable Lands-Based 2017-2050 Population and Employment Growth Allocations

POPULATION	Population		Employment	
	Cities & Towns	Urban Uninc	Cities & Towns	Urban Uninc
King County	74,820	4,390	34,860	1,410
Kitsap County	N/A	23,440	N/A	7,400
Pierce County	49,620	108,340	23,120	26,960
Snohomish County	14,540	69,070	16,350	35,090
Region	138,990	205,240	74,340	70,860

For this application, King County’s Buildable Lands estimates for urban unincorporated communities were adjusted using parcel-level UrbanSim capacity estimates to account for areas that had been annexed since the estimates were published. Pierce County’s summary Buildable Lands estimates for its entire urban unincorporated area were apportioned to individual urban unincorporated planning communities using the county’s parcel-level Buildable Lands database. In both counties, housing capacity estimates were converted to population using a series of jurisdiction-specific factors for vacancy, average household size, and group quarter population.

The final Reset Urban Growth Alternative uses the preliminary Rural growth allocations along with the Buildable Lands-based growth allocations for Cities and Towns and Urban Unincorporated. The balance of remaining growth within each county is then proportionally reallocated to Metropolitan Cities, Core Cities, and HCT Communities based on the preliminary growth distributions. Selected manual adjustments were made to the employment growth allocations to better reflect the intended policy goals of the Reset Urban Growth Alternative. Lastly, the 5 percentage point jobs shift to improve the balance of jobs and housing across counties was implemented, which shifts more job growth to Kitsap, Pierce, and Snohomish counties from King County. During this final adjustment, the growth allocations for Cities and Towns, Urban Unincorporated, and Rural were held constant such that the shift only impacted Metropolitan Cities, Core Cities, and HCT Communities.

Table C.2-15. 2017-2050 Population and Employment Growth Allocations – Reset Urban Growth

POPULATION	Metro Cities	Core Cities	HCT Comm	Cities & Towns	Urban Uninc	Rural	Total
King County	41% (354,000)	38% (331,000)	10% (83,000)	9% (75,000)	1% (4,000)	3% (24,000)	100% (872,000)
Kitsap County	21% (20,000)	9% (9,000)	30% (29,000)	N/A N/A	24% (23,000)	16% (15,000)	100% (97,000)
Pierce County	26% (96,000)	17% (62,000)	7% (26,000)	14% (50,000)	30% (108,000)	6% (22,000)	100% (364,000)
Snohomish County	19% (82,000)	8% (36,000)	42% (180,000)	3% (15,000)	16% (69,000)	10% (43,000)	100% (424,000)
Region	31% (551,000)	25% (438,000)	18% (318,000)	8% (139,000)	12% (205,000)	6% (104,000)	100% (1,756,000)
EMPLOYMENT	Metro Cities	Core Cities	HCT Comm	Cities & Towns	Urban Uninc	Rural	Total
King County	44% (303,000)	44% (300,000)	6% (38,000)	5% (35,000)	0% (1,000)	1% (5,000)	100% (682,000)
Kitsap County	29% (16,000)	24% (13,000)	28% (16,000)	N/A N/A	13% (7,000)	6% (3,000)	100% (57,000)
Pierce County	40% (78,000)	19% (36,000)	13% (25,000)	12% (23,000)	14% (27,000)	3% (6,000)	100% (195,000)
Snohomish County	34% (76,000)	11% (25,000)	28% (62,000)	7% (16,000)	16% (35,000)	5% (10,000)	100% (225,000)
Region	41% (473,000)	32% (374,000)	12% (141,000)	6% (74,000)	6% (71,000)	2% (25,000)	100% (1,158,000)

## C.2.5 Preferred Growth Alternative

The Preferred Growth Alternative represents a compact growth pattern based on the VISION 2040 Regional Growth Strategy that assumes accelerated growth near the region’s existing and planned transit investments. The Preferred Growth Alternative is primarily based on the Transit Focused Growth Alternative, with adjustments to some growth allocations, regional geography classifications, and the high-capacity transit growth goal. The alternative has an explicit goal for 65 percent of the region’s population growth and 75 percent of employment growth to occur within regional growth centers and areas in proximity to current and planned investments in high-capacity transit, including light rail, bus rapid transit, commuter rail, ferries, and streetcar.

The Preferred Growth Alternative continues to allocate the largest shares of growth to Metropolitan Cities, Core Cities, and HCT Communities. Compared to Transit Focused Growth, the Preferred Growth Alternative assumes a slightly greater role for Metropolitan Cities, HCT Communities, and Cities and Towns, and a lessened role for Core Cities and Urban Unincorporated areas without access to high-capacity transit or unaffiliated for annexation. Some of these shifts are associated with regional geography reclassifications. Growth in Rural areas is lower than Stay the Course but slightly higher than Transit Focused Growth.

This action alternative (like Transit Focused Growth and Reset Urban Growth) uses the revised county growth distributions discussed in the County Growth Shares – Action Alternatives section (Section C.2.1). The revised county assumptions direct higher levels of (primarily population) growth to King County from the region’s other counties. The future balance of jobs and housing across the region’s counties shows greater improvement compared to Stay the Course.

## **Methodology**

A Draft Supplemental Environmental Impact Statement (SEIS) analyzing the Stay the Course, Transit Focused Growth, and Reset Urban Growth alternatives was released on February 28, 2019, followed by a 60-day comment period. The Draft SEIS builds on data and analysis contained in the VISION 2040 Final Environmental Impact Statement and other existing environmental documents, and presents new information and analysis.

The Growth Management Policy Board used several tools, including the Draft SEIS analysis, to develop the VISION 2050 Preferred Growth Alternative:

- Evaluation criteria that assesses the differential impacts of the alternatives studied in the Draft SEIS (see Appendix D). Available at:  
<https://www.psrc.org/sites/default/files/v2050-dseis-appendixd-evaluationcriteria.pdf>
- Summary of Draft SEIS public comments. Available at:  
<https://www.psrc.org/sites/default/files/v2050-28may2019-seiscommentssummary.pdf>
- Supplemental technical evaluation. Available at:  
<https://www.psrc.org/sites/default/files/vision2050alternativespaper.pdf>
- Board priorities based on discussions at board meetings

The Preferred Growth Alternative is based primarily on the Transit Focused Growth Alternative (Section C.2.3). Changes were incorporated to make selected adjustments to the growth allocations, regional geography classifications, and high-capacity transit growth goal in that alternative.

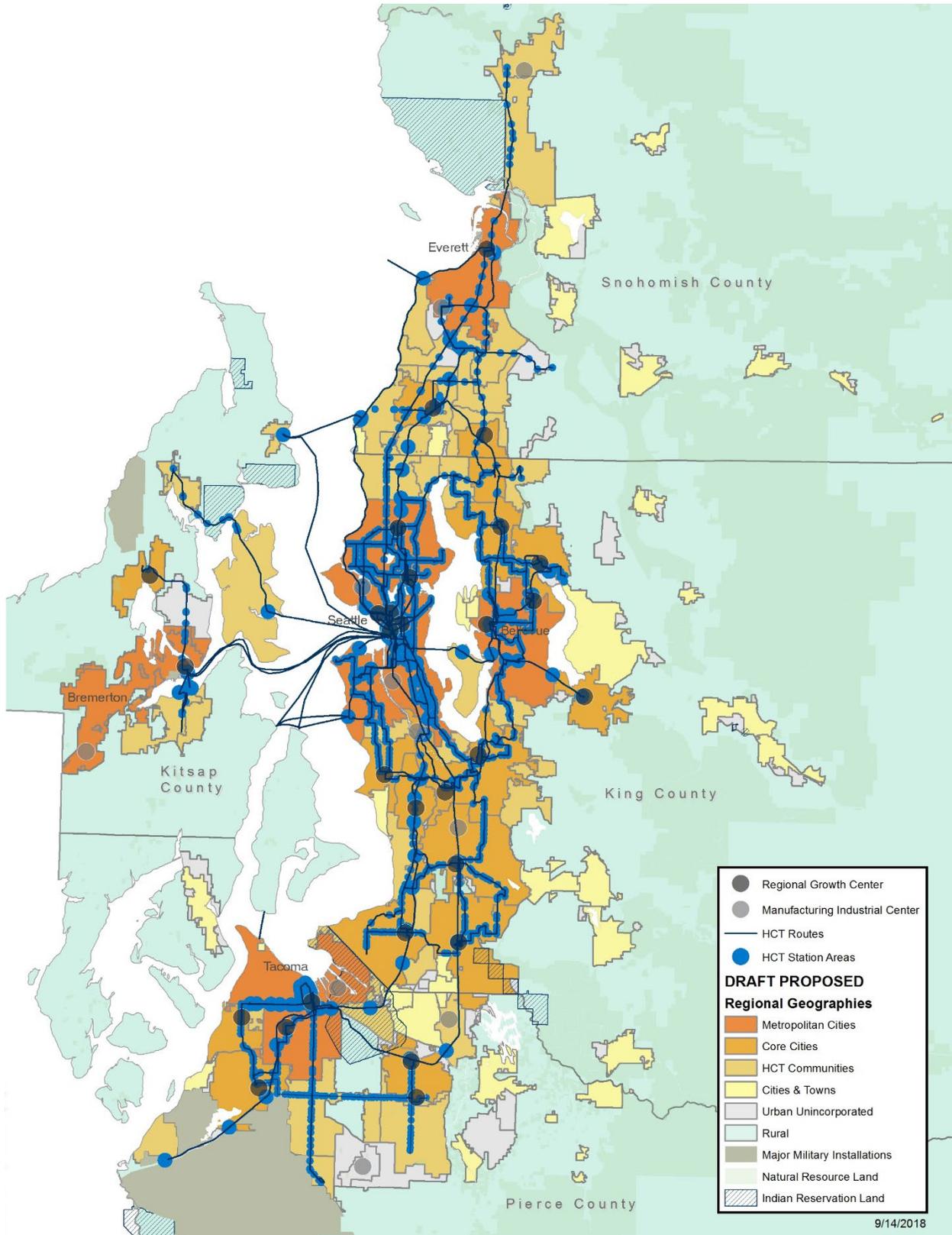
For the Preferred Growth Alternative, the high-capacity transit growth goal was adjusted to direct 65 percent (rather than 75 percent) of the region’s future population growth to regional growth centers and high-capacity transit station areas. Seventy-five percent of the region’s employment growth continues to be directed to these areas.

Several urban unincorporated planning areas were reclassified from the Urban Unincorporated regional geography to other categories based on feedback and new information from local governments. In Kitsap County, unincorporated areas affiliated for annexation by cities—Bremerton UGA, Port Orchard UGA, and Poulsbo PUTA—were shifted to the associated city’s regional geography to account for the local process to develop growth targets. The unincorporated community of Kingston was also reclassified as a HCT Community to account for its ferry service and plans for future incorporation. Changes in Pierce County reclassified the

Mid-County, Parkland-Spanaway-Midland, and South Hill (which includes the southern portion of the Puyallup PAA) urban unincorporated areas as HCT Communities to account for upcoming action to designate additional Planned Incorporation Areas as well as plans for additional bus rapid transit service. Growth allocations were adjusted to account for these changes.

The revised regional geography classifications are presented in Table C.2-7. The revised definition of high-capacity transit station areas in the Preferred Growth Alternative is shown on the following map.

Figure C.2-6. High-Capacity Transit Station Areas – Preferred Growth Alternative



The Preferred Growth Alternative included a few additional modifications to the Transit Focused Growth-based growth allocations in addition to the adjustments associated with regional geography reclassifications. In Pierce County, a modest amount of additional population growth was shifted from Core Cities primarily to HCT Communities as well as Metropolitan Cities. In Snohomish County, some population growth was reallocated from HCT Communities to (in descending order of magnitude) Cities and Towns, Urban Unincorporated areas, Core Cities, and Rural areas. The final growth allocations for the Preferred Growth Alternative are presented in the following table.

**Table C.2-15. 2017-2050 Population and Employment Growth Allocations – Preferred Growth Alternative**

<b>POPULATION</b>	<b>Metro Cities</b>	<b>Core Cities</b>	<b>HCT Comm</b>	<b>Cities &amp; Towns</b>	<b>Urban Uninc</b>	<b>Rural</b>	<b>Total</b>
King County	44% (381,000)	40% (346,000)	11% (92,000)	5% (44,000)	0% (4,000)	1% (6,000)	100% (872,000)
Kitsap County	34% (33,000)	16% (15,000)	36% (34,000)	0% 0	6% (6,000)	8% (8,000)	100% (97,000)
Pierce County	38% (137,000)	23% (85,000)	21% (77,000)	7% (25,000)	8% (29,000)	3% (11,000)	100% (364,000)
Snohomish County	20% (87,000)	12% (51,000)	50% (210,000)	11% (45,000)	4% (18,000)	3% (13,000)	100% (424,000)
Region	36% (637,000)	28% (497,000)	24% (413,000)	6% (114,000)	3% (57,000)	2% (38,000)	100% (1,756,000)
<b>EMPLOYMENT</b>	<b>Metro Cities</b>	<b>Core Cities</b>	<b>HCT Comm</b>	<b>Cities &amp; Towns</b>	<b>Urban Uninc</b>	<b>Rural</b>	<b>Total</b>
King County	46% (311,000)	45% (310,000)	6% (40,000)	3% (18,000)	0% (1,000)	0% (3,000)	100% (682,000)
Kitsap County	35% (20,000)	26% (15,000)	32% (18,000)	0% 0	2% (1,000)	5% (3,000)	100% (57,000)
Pierce County	48% (94,000)	23% (44,000)	15% (29,000)	6% (13,000)	6% (12,000)	2% (3,000)	100% (195,000)
Snohomish County	39% (89,000)	17% (39,000)	30% (68,000)	8% (18,000)	3% (7,000)	2% (4,000)	100% (225,000)
Region	44% (514,000)	35% (407,000)	13% (155,000)	4% (49,000)	2% (21,000)	1% (13,000)	100% (1,158,000)

## **C.2.6 Modeling the Alternatives in UrbanSim**

Once the growth assumptions for each alternative are defined at the county and regional geography levels, additional steps are taken to prepare the alternatives for simulation in the UrbanSim model framework.

## **Jurisdiction-Level Control Totals**

To model the alternatives, UrbanSim uses jurisdiction-level growth assumptions for population, households, and employment as intermediate inputs for disaggregating county and regional geography level growth allocations down to parcels. Within each jurisdiction, the model then simulates how the growth is likely to occur at the parcel level given the development parameters set by the jurisdiction's comprehensive plan and/or zoning regulations.

**Local Growth Targets.** PSRC used the latest available local population and employment growth targets established through countywide target-setting processes to disaggregate the 2017 to 2050 growth assumptions proportionally for each alternative from county regional geographies down to individual jurisdictions. In this approach, growth targets serve as a proxy for shared understanding between local jurisdictions regarding the relative role each plays in accommodating their respective county's future growth.

In King County, where growth targets are established in housing units in lieu of population, a series of jurisdiction-specific factors for vacancy, average household size, and group quarter population are applied to convert local housing targets to population. In King and Snohomish Counties, where employment targets do not include jobs in the Construction & Resource Sector, those jobs are estimated and added so the targets represent total employment.

**Base and Future Year Controls.** Throughout the annual simulation process, jurisdiction level controls are instituted in the 2017 base year and in 5-year increments from 2020 to 2050. The 2017 base year controls are based on actual population, household, and employment estimates. Jurisdictional growth assumptions (2017 to 2050) for each alternative are added to the base year estimates to produce 2050 horizon year controls. Controls for the remaining future 5-year increments from 2020 to 2045 are interpolated on a straight-line basis from the 2017 and 2050 values, then adjusted to match regional controls from PSRC's Macroeconomic Forecast. All jurisdiction -level control totals reflect municipal and planning boundaries as of April 1, 2017.

**Population and Household Controls.** The UrbanSim household location choice model simulates the placement of new households and persons allocated to each jurisdiction, as well as a subset of movers, into vacant housing units. It does not account for persons in group quarter facilities (e.g., college dormitories, nursing homes, correctional facilities, etc.).

Preliminary jurisdiction-level controls for total population are adjusted to remove the group quarters component. Jurisdiction-specific factors for average household size are then applied to convert the household population controls into households. Last, household population is sorted into households by size of household (e.g., one-person, two-person, three-person, etc.), which serve as the final inputs to the model. The group quarters component is added back in as a post-processing step subsequent to the modeling process to develop the evaluation metrics used in analyzing the modeling results.

**Employment Controls.** Similarly, the UrbanSim employment location choice model works to place new jobs, as well as a subset of relocating firms/jobs into available commercial and industrial space. The model accounts for jobs by sector, home-based employment, and civilian

military employment, but it does not address non-civilian military employment (i.e., enlisted and service personnel).

PSRC does not forecast change on military bases, which are assumed to maintain existing levels of non-civilian military employment across all alternatives. Uniformed military personnel counts are added back in as a post-processing step subsequent to the modeling process for reporting purposes.

## **Additional Modeling Assumptions**

In simulating the alternatives, the following adjustments to the UrbanSim model and model inputs were applied:

**Capacity Adjustments.** PSRC uses local zoning and development regulations to represent allowable future land uses. Future land use assumptions for local jurisdictions were compiled from 2015/16 comprehensive plan updates, and they were revised where significant zoning changes were adopted following the update. In some instances, the jurisdiction-level control totals resulting from the methodology described above may exceed the maximum development capacity as interpreted from local comprehensive plans and/or zoning. In these cases, PSRC increases capacity equally across all zones within the jurisdiction to accommodate the control total. These assumed capacity adjustments are for modeling and analysis purposes only – actual growth targets and future changes in development capacity would differ based on local circumstances and planning.

**Regional Growth Center Capacity Boost.** For jurisdictions with a designated regional growth center or centers, capacity is raised for all parcels located within centers to increase the likelihood of higher-density projects being developed through the simulation. The capacity boost is intended to direct a greater share of each jurisdiction’s growth to its growth center or centers per VISION 2040 policy.

**High-Capacity Transit Growth Goal.** The Transit Focused Growth and Preferred Growth alternatives explicitly direct an established percentage of future population and employment growth to designated regional growth centers and high-capacity transit station areas. To operationalize this concept within the UrbanSim model framework, PSRC used the following approach:

First, population and employment control totals for each Metropolitan City, Core City, and HCT Community were apportioned to high-capacity transit and non-high-capacity transit areas within each jurisdiction based on development capacity. In an iterative process, the growth assumptions for individual high-capacity transit areas were increased until the sum across all high-capacity transit areas met the specified high-capacity transit growth goal for the two alternatives. The non-high-capacity transit component of each jurisdiction’s control totals were adjusted downward accordingly – but no lower than a 10 percent share – to maintain the original jurisdiction-wide control values. This approach ensures that the UrbanSim simulation process is guided by controls consistent with the high-capacity transit growth goals for both alternatives. Secondly, capacity assumptions for high-capacity transit areas were scaled upwards in some jurisdictions, as needed, to accommodate the assigned growth.

## Modeling Changes

Following the release of the Draft SEIS in February 2019, additional sensitivity testing was conducted on the draft model runs of the alternatives to identify potential refinements needed to improve modeling and analysis of the alternatives. Based on new findings from the sensitivity tests, two adjustments were incorporated into the final model runs of the Stay the Course, Transit Focused Growth, Reset Urban Growth, and Preferred Growth alternatives.

**UrbanSim Developer Sub-Model.** The UrbanSim model uses a setting in its developer sub-model to determine whether land development is or is not constrained by jurisdiction-level control totals. This setting can affect where new and redeveloped residential and commercial development is located across the region.

Sensitivity tests to investigate the effect of adjusting the setting showed that employing the developer sub-model resulted in more infill development in already urbanized areas and less development of vacant parcels in more outlying areas of the region. Most of the resulting evaluation metrics were affected by only a minor to moderate degree, but a few metrics directly associated with land development patterns (e.g., Housing Choice, Growth in TOD Areas, Developed Land, and Impervious Surface) showed more substantive changes.

The adjustments generally did not change the relative performance ranking of the three alternatives evaluated in the Draft SEIS analysis, but they did serve to accentuate distinctions between Transit Focused Growth and the other alternatives in the expected direction, as well as to decrease the distinction between Stay the Course and Reset Urban Growth for some indicators. For the final model runs, the developer sub-model setting was employed for all four alternatives.

**Regional Growth Center Capacity Boost.** In the Stay the Course and Reset Urban Growth alternatives studied in the Draft SEIS, the modeling methodology applied a development capacity boost to parcels within designated regional growth centers to approximate the attraction of higher-density projects to regional growth centers, thus directing a greater share of each Metropolitan and Core City's growth to its center or centers per VISION 2040 policy.

In modeling the Draft SEIS Transit Focused Growth Alternative, an alternate methodology was used that explicitly directed 75% of the region's population and employment growth to regional growth centers and high-capacity transit station areas. The centers capacity boost was not applied because it was thought the alternate methodology would essentially mimic the effect of the boost.

Subsequent testing and analysis identified that without the capacity boost the model assigned a greater share of Metropolitan and Core Cities' growth to other high-capacity transit areas like bus rapid transit stations at the expense of regional growth centers in the Transit Focused Growth Alternative compared to Stay the Course and Reset Urban Growth. Adding the centers capacity boost was found to address the discrepancy.

To promote consistency across the VISION 2050 alternatives, the modeling methodology for Transit Focused Growth was refined to include the regional growth center capacity boost for the final model run. The same approach was used to model the final Preferred Growth Alternative.

### UrbanSim Model Output

The UrbanSim land use modeling outputs serve as inputs to the regional travel demand forecasting model, and the travel modeling outputs, in turn, support the air quality analysis tool. Outputs from all three modeling processes were used to produce a set of evaluation metrics—presented in the Evaluating the VISION 2050 Alternatives section that follows—to quantify the differential environmental impacts of each alternative.

## C.3 Evaluating the VISION 2050 Alternatives

### C.3.1 Model-Based Evaluation Metrics

The analysis of the environmental impacts of the VISION 2050 alternatives—documented in the Environmental Effects and Mitigation chapter (Chapter 4) of this document—relied upon a series of quantitative evaluation metrics developed from PSRC’s land use, travel demand, and air quality models. These metrics also served as evaluation criteria to inform the selection of the Preferred Growth Alternative as described in Appendix D.

The full set of model-derived indicators is presented below in Table C.3-1.

Table C.3-1. Model-Based Indicators for Evaluating VISION 2050 Alternatives

Indicator	Definition	Unit	Reporting Geography or Category
<b>Population, Employment &amp; Housing</b>			
Population and Employment Density Change (map)	Change in activity unit density per acre – 2017-2050	Activity units (i.e., persons + jobs) per acre	Hexagonal (90-acre) grid cells
Population and Employment Density (map)	Activity unit density per acre – 2050	Activity units (i.e., persons + jobs) per acre	Hexagonal (90-acre) grid cells
Jobs-Housing Ratio	Jobs per housing unit ratios – 2017 and 2050; ratios indexed to regional average jobs-housing ratio	Jobs per housing unit	Region Regional subareas Equity geographies
Housing Choice	Housing units in areas zoned for low density (< 12 units/acre), moderate density (12-49 units/acre), and high density (50+ units/acre) residential and mixed-use development – 2017, 2017-2050 change, and 2050	Housing units, total and percent distribution by density category	Region Counties Equity geographies

Table C.3-1. Model-Based Indicators for Evaluating VISION 2050 Alternatives  
(continued)

Indicator	Definition	Unit	Reporting Geography or Category
<b>Land Use</b>			
Population and Employment Density Change (map)	(Same as Population, Employment & Housing indicator above)		
Population and Employment Density (map)	(Same as Population, Employment & Housing indicator above)		
Developed Land	Developed land area – vacant parcels, redeveloped parcels, and total – 2017 (total developed land only), 2017-2050 change, and 2050; development types are defined as low density (<12 units/acre), moderate density (12-49 units/acre), and high density (50+ units/acre) residential and mixed-use development	Acres	Region Counties Development types Equity geographies
Development in Proximity to Urban Growth Area (UGA) Boundary	Activity units within (inside and outside) one-quarter mile of urban growth area boundary – 2017, 2017-2050 change, and 2050	Activity units (i.e., persons + jobs), total and percent share	Region Counties
Access to Transit Service	Activity units within one-half mile of light rail stations, commuter rail stations, and ferry terminals and/or within one-quarter mile of bus rapid transit and local transit stations – 2017, 2017-2050 change, and 2050	Activity units (i.e., persons + jobs), total and percent share	Region Counties Equity geographies
Growth in High Capacity Transit (HCT) Areas	Activity units in regional growth centers and/or within one-half mile of light rail stations, commuter rail stations, and ferry terminals in urban growth areas and/or within one-quarter mile of bus rapid transit in urban growth areas – 2017, 2017-2050 change, and 2050	Activity units (i.e., persons + jobs), total and percent share	Region Counties Equity geographies

Table C.3-1. Model-Based Indicators for Evaluating VISION 2050 Alternatives  
(continued)

Indicator	Definition	Unit	Reporting Geography or Category
<b>Transportation</b>			
Average Trip Distance – Commute Trips	Average weekday commute trip distance from home to work for residents – 2014 and 2050; excludes truck, visitor, external, and airport trips	Miles	Region Counties Regional subareas Equity geographies
Average Trip Distance – Non-Commute Trips	Average weekday non-commute trip distance for residents – 2014 and 2050; excludes truck, visitor, external, and airport trips	Miles	Region Counties Regional subareas Equity geographies
Mode Share – Commute Trips	Average weekday resident home to work commute mode share (SOV, HOV, Transit, Walk, Bike) – 2014 and 2050	Trips, percent distribution by mode	Region Counties Equity geographies
Mode Share – Non-Commute Trips	Average weekday resident non-commute mode share (SOV, HOV, Transit and School Bus, Walk, Bike) – 2014 and 2050	Trips, percent distribution by mode	Region Counties Equity geographies
Vehicle Miles Traveled – Residents	Average daily weekday vehicle miles traveled per resident – 2014 and 2050; excludes truck, visitor, and airport trips	Miles	Region Counties Regional subareas Equity geographies
Vehicle Miles Traveled – System	Total daily weekday vehicle miles on the PSRC roadway network – 2014 and 2050; includes resident, truck, visitor, and airport trips	Miles	Region Counties
Vehicle Time Traveled – Residents	Average daily weekday vehicle minutes traveled per resident – 2014 and 2050; excludes truck, visitor, and airport trips	Minutes	Region Counties Regional subareas Equity geographies
Vehicle Time Traveled – System	Total daily weekday vehicle hours on the PSRC roadway network – 2014 and 2050; includes resident, truck, visitor, and airport trips	Hours	Region Counties
Vehicle Delay – Residents	Average annual delay hours per resident – 2014 and 2050; excludes truck, visitor, and airport trips	Hours	Region Counties Regional subareas Equity geographies
Vehicle Delay – System	Total daily weekday vehicle delay hours on the PSRC roadway network – 2014 and 2050; includes resident, truck, visitor, and airport trips	Hours	Region Counties
Transit Boardings	Annual PSRC region transit network boardings by operator – 2014 and 2050; excludes ferry boardings	Transit boardings	Region Transit agencies

Table C.3-1. Model-Based Indicators for Evaluating VISION 2050 Alternatives  
(continued)

Indicator	Definition	Unit	Reporting Geography or Category
Residents Walking, Biking, or Using Transit	Percent of residents walking, biking, or using transit on an average weekday – 2014 and 2050	Persons, percent share	Region Counties Equity geographies
Job Accessibility by Travel Mode	Average number of jobs within a 45-minute transit trip, 1-mile walk, or 3-mile bike ride – 2014 and 2050; weighted by number of people in each zone	Jobs	Counties Equity geographies
Travel Time for Major Corridors	Average 2050 weekday travel times for single occupancy passenger vehicles for select locations during peak morning (AM) and afternoon (PM) periods	Minutes	Travel corridors
<b>Air Quality</b>			
Projected Pollutant Emissions	Total daily tons of emissions from all passenger vehicles and trucks on a typical weekday across the region for CO, NO <sub>x</sub> , VOCs, CO <sub>2e</sub> , PM <sub>10</sub> , and PM <sub>2.5</sub> – 2014 and 2050	Tons	Region
<b>Water Quality &amp; Hydrology</b>			
Impervious Surface	Acres of impervious surface – 2017, 2017-2050 change, and 2050; age of development is categorized as built before 1996, built 1996 or after, and built before 1996 but redeveloped 1996 or after	Acres	Region Counties Age of development
Developed Land	(Same as Land Use indicator above)		
<b>Parks &amp; Recreation</b>			
Access to Parks	Population within one-quarter mile of “parks providing local urban access,” defined as parks, trails, and other open space facilities located in or within one-quarter mile of urban growth areas – 2017, 2017-2050 change, and 2050	Persons, total and percent share	Region Counties Equity geographies

Table C.3-1. Model-Based Indicators for Evaluating VISION 2050 Alternatives  
(continued)

Indicator	Definition	Unit	Reporting Geography or Category
<b>Social Equity &amp; Environmental Justice</b>			
Access to Opportunity	Population in census tracts defined as having moderate, high, or very high access to opportunity, i.e., tracts with the highest 60% of Opportunity Index scores per PSRC's 2018 Opportunity Index – 2017, 2017-2050 change, and 2050	Persons, total and percent share	Region Counties Equity geographies
Displacement Risk	Population in census tracts defined as having higher displacement risk, i.e., tracts with the highest 10% of Displacement Risk Index scores per PSRC's 2018 Displacement Risk Index – 2017, 2017-2050 change, and 2050	Persons, total and percent share	Region Counties Equity geographies

CO = carbon monoxide; CO<sub>2e</sub> = carbon dioxide equivalent; HOV = high-occupancy vehicle; NO<sub>x</sub> = nitrogen oxides; PM<sub>2.5</sub> = fine particulates; PM<sub>10</sub> = coarse particulates; SOV = single-occupant vehicle; TOD = transit-oriented development; VOC = volatile organic compound

In addition to the model-based evaluation metrics detailed above, the analysis of the alternatives was also supplemented by a variety of non-modeled quantitative data metrics and qualitative assessments provided by the consultants at Parametrix.

### C.3.2 Equity Geographies

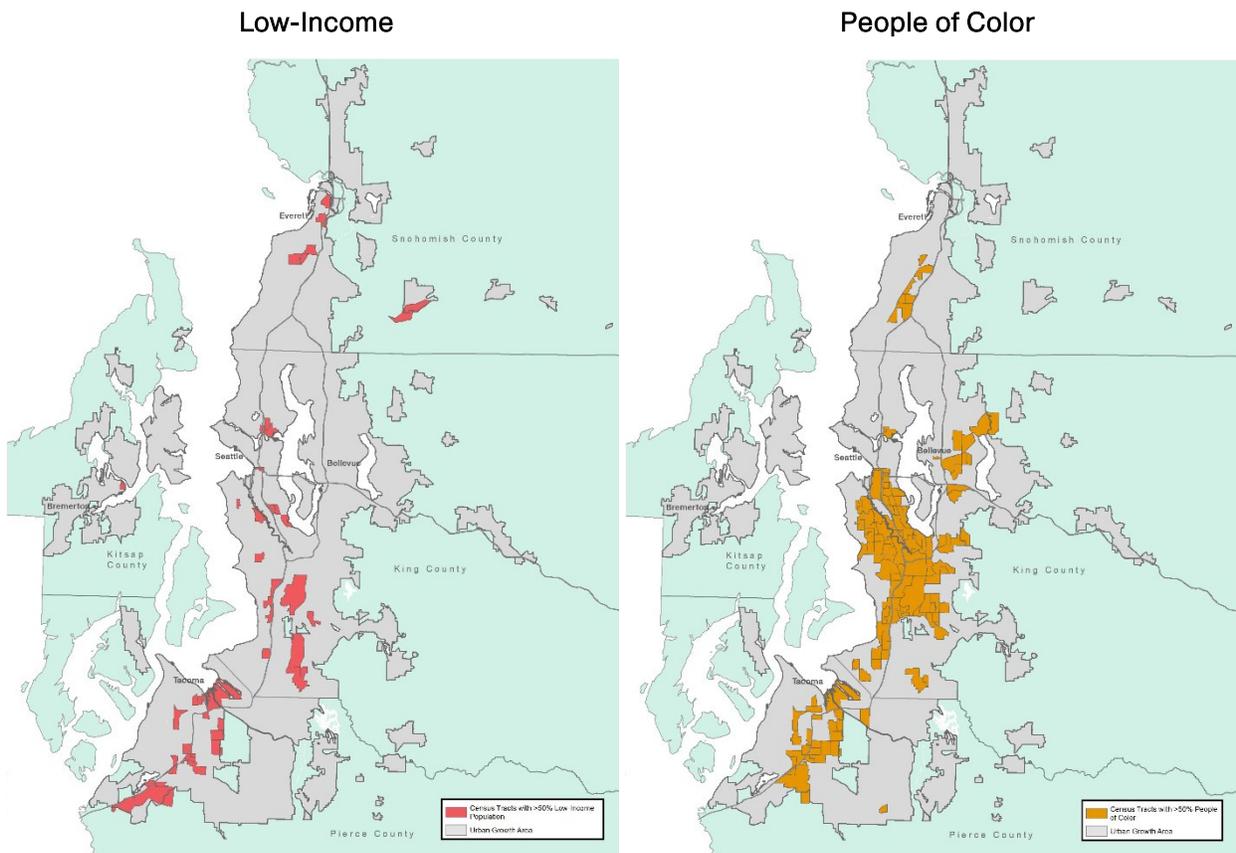
To support the Environmental Justice impacts analysis and social equity considerations described in Chapters 4 and 5 of this document as well as the broader Social Equity Analysis presented in Appendix H, a subset of the evaluation metrics was produced for four “equity geographies” to facilitate an assessment of how the alternatives may differentially impact the region’s low-income communities and people of color.

The equity geographies were defined as follows:

- **Low-income equity geographies:** Census tracts in which more than half the population today is at or below 200 percent of the federal poverty threshold
- **Non-Low Income:** Census tracts in which 50 percent or less of the population today is at or below 200 percent of the federal poverty threshold
- **People of color equity geographies:** Census tracts in which more than half the population today is non-White, including White Hispanics
- **Non-People of color equity:** Census tracts in which 50 percent or less of the population today is non-White, including White Hispanics

The region’s census tracts were assigned to the equity geographies using data from the 2012 to 2016 American Community Survey 5-year estimates series.

Figure C.3-1. Equity Geographies



### C.3.3 Access to Opportunity and Displacement Risk

Two metrics were developed to facilitate discussions regarding social equity and environmental justice in the evaluation of the alternatives. The Access to Opportunity measure reports population growth for the different alternatives in “areas of moderate to very high opportunity,” defined as census tracts with the highest 60 percent of scores per PSRC’s 2018 Opportunity Index.

The Displacement Risk measure reports population growth in “areas of higher displacement risk,” defined as census tracts with the highest 10 percent of scores per PSRC’s 2018 Displacement Risk Index. Both measures were calculated for the region, the four counties, and the four equity geographies. The methodologies for the Opportunity Index and the Displacement Risk Index are described below.

#### Opportunity Index

The Access to Opportunity measure is based on PSRC’s 2018 Opportunity Index, which was originally developed as part of the Growing Transit Communities work done by PSRC and the Kirwan Institute for the Study of Race and Ethnicity at The Ohio State University and published in May 2012.

In 2011, a variety of stakeholders and advocates throughout the region contributed to the development of the regional Opportunity Index. This participation process resulted in a set of opportunity indicators representing five key elements of neighborhood opportunity: Education, Economic Health, Housing and Neighborhood Quality, Mobility and Transportation, and Health and Environment. The data from these five opportunity indicators were compiled into a comprehensive index of opportunity for all census tracts within the urban growth area of the region. A background report with a more detailed discussion of individual metrics and data sources and an interactive online map are available on PSRC's website:

<https://www.psrc.org/opportunity-mapping>.

In 2018, the Opportunity Index was updated with the most recent applicable data and expanded to include all census tracts in the region. The level of opportunity (very low, low, moderate, high, very high) is determined by sorting all census tracts into quintiles based on their index scores. The census tracts identified as having "very high" opportunity represent the top 20 percent of scores among all tracts, "high" the next 20 percent, etc. As such, "areas of moderate to very high opportunity" represent the top 60 percent of scores among all tracts.

### **Displacement Risk Index**

The Displacement Risk measure is based on a new regional Displacement Risk Index, which was developed by PSRC following a similar approach used by the City of Seattle for their analysis in the 2035 Growth and Equity report. The index is a composite of displacement indicators representing five elements of neighborhood displacement risks: Socio-Demographics, Transportation Qualities, Neighborhood Characteristics, Housing, and Civic Engagement. The data from these five groups of displacement indicators were compiled into a comprehensive index of displacement risk for all census tracts in the region. "Areas of higher displacement risk" represent census tracts with the top 10 percent of index scores among all tracts. A background report with a more detailed discussion of individual metrics and data sources and an online map are available on PSRC's website: <https://www.psrc.org/displacement-risk-mapping>.



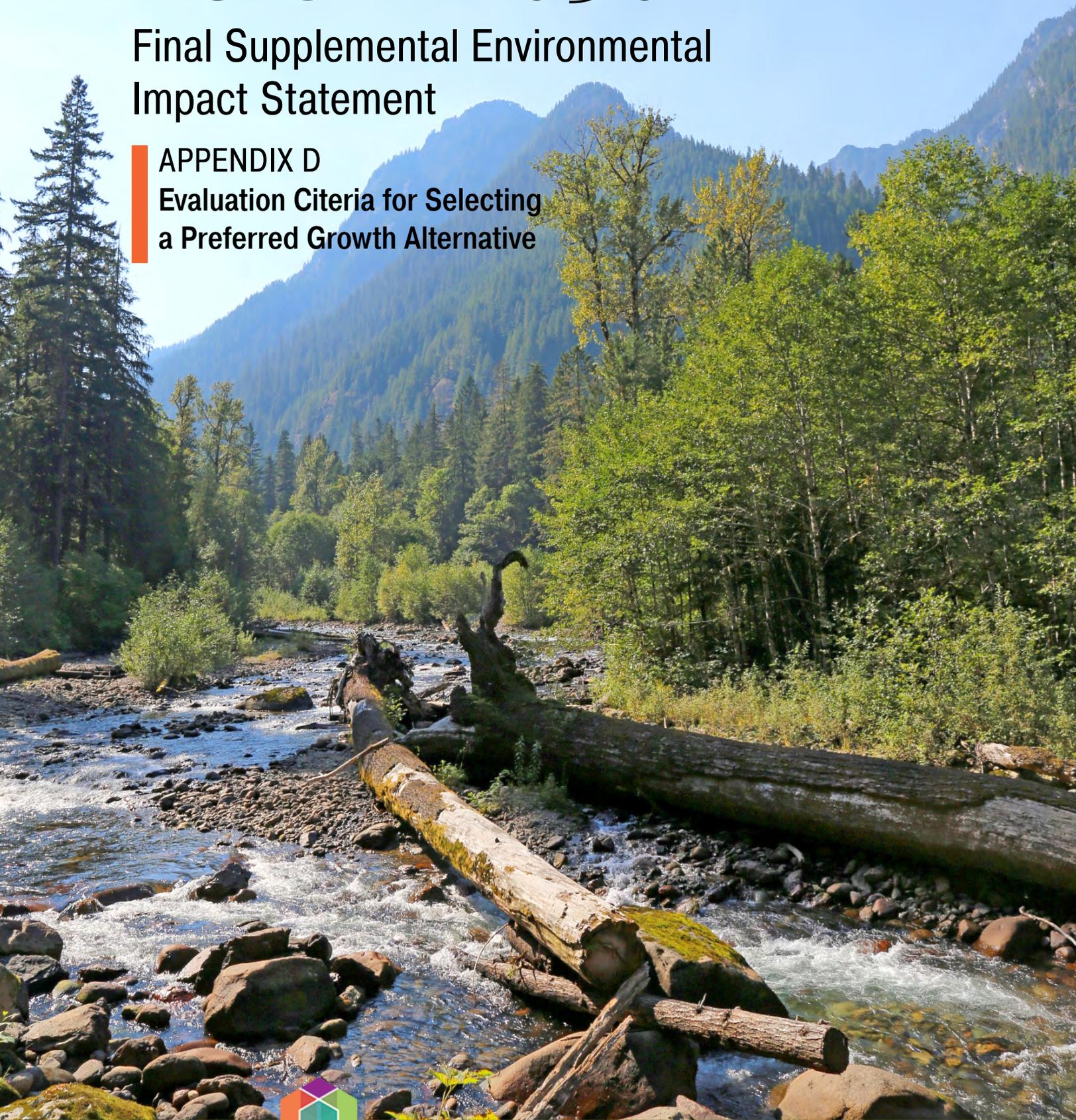
PSRC

# VISION 2050

## Final Supplemental Environmental Impact Statement

### APPENDIX D

### Evaluation Criteria for Selecting a Preferred Growth Alternative





# Appendix D: Evaluation Criteria for Selecting a Preferred Growth Alternative

*This appendix shows the measures used to assess the alternatives evaluated in the Final Supplemental Environmental Impact Statement (SEIS).*

## **Process to Select a Preferred Growth Alternative**

The purpose of the evaluation criteria is to summarize information from the Final SEIS to assist the Executive Board in their selection of a preferred growth alternative. The evaluation criteria are one tool among many. Other tools to develop the Preferred Growth Alternative include public comment, supplemental technical evaluation, and board priorities.

The evaluation criteria are intended to help the Board compare alternatives on a variety of measures and in relationship to a series of outcomes that the Board identified to be advanced by VISION 2050. Any ranking of alternatives implied by the evaluation criteria when they are assessed will inform the Board's decision, not drive or bind it.

## **VISION 2050 Outcomes**

VISION 2050 strives to advance the following outcomes.

- **Climate.** The region's contribution to climate change has been substantially reduced.
- **Community.** Distinct, unique communities are supported throughout the region.
- **Diversity.** The region's diversity continues to be a strength. People from all backgrounds are welcome, and displacement due to development pressure is lessened.
- **Economy.** Economic opportunities are open to everyone, the region competes globally, and has sustained a high quality of life. Industrial, maritime, and manufacturing opportunities are maintained.
- **Environment.** The natural environment is restored, protected, and sustained, preserving and enhancing natural functions and wildlife habitats.
- **Equity.** All people can attain the resources and opportunities to improve their quality of life and enable them to reach their full potential.
- **Health.** Communities promote physical, social, and mental well-being so that all people can live healthier and more active lives.
- **Housing.** A range of housing types ensures that healthy, safe, and affordable housing choices are available and accessible for all people throughout the region.

- **Innovation.** The region has a culture of innovation that embraces and responds to change.
- **Mobility and Connectivity.** A safe, affordable, and efficient transportation system connects people and goods to where they need to go, promotes economic and environmental vitality, and supports the Regional Growth Strategy.
- **Natural Resources.** Natural resources are sustainably managed, supporting the continued viability of resource-based industries, such as forestry, agriculture, and aquaculture.
- **Public Facilities and Services.** Public facilities and services support the region’s communities and plans for growth in a coordinated, fair, efficient, and cost-effective manner.
- **Resilience.** The region’s communities plan for and are prepared to respond to potential impacts from natural and man-made hazards.
- **Rural Areas.** Rural communities and character are strengthened, enhanced, and sustained.

## Evaluation Criteria

To evaluate the alternatives against the outcomes listed above, a set of criteria were developed. The criteria are organized under the nine categories that correspond to chapters and major themes in VISION 2050 in the table below.

Category	Regional Outcome
Climate Change	Climate, Resilience
Development Patterns	Rural Areas
Economy	Economy, Innovation
Environment	Environment, Natural Resources
Equity	Community, Diversity, Equity
Health	Health
Housing	Housing
Public Services	Public Facilities and Services
Transportation	Mobility and Connectivity

The criteria are evaluated using related measures from the Final SEIS. Each measure is ranked based on performance. The alternative with the best/highest relationship to the measure/outcome is identified using a full circle. Where the analysis shows two alternatives essentially tied, they will have the same ranking. Where the analysis finds an alternative having the worst relationship to the measure/outcome, a circle that is only one-quarter full is shown. Where the analysis shows all the alternatives being similar or no conclusive determination is made (i.e., where a tradeoff exists that cannot easily be resolved based on either environmental or policy analysis), half-filled circles are shown for all of the alternatives.

The circles represent the ordering of the alternatives, rather than the magnitude of the differences between the alternatives. The differences between the alternatives represented by

different circle-shading may be subtle or large. To understand the magnitude of the differences between the alternatives, please see the supplemental data tables in Appendix B. Additional descriptions for each measure are provided in Appendix C.

## Climate Change

Measure	Stay the Course	Transit Focused Growth	Reset Urban Growth	Preferred Growth Alternative
Greenhouse gas emissions				
Carbon sequestration (acres of land developed)				
Total				

### Observations on Climate Change Measures

Of the climate change measures listed above, Transit Focused Growth performs the best, followed closely by the Preferred Growth Alternative. These alternatives are expected to result in the lowest levels of greenhouse gas emissions and develop the fewest number of acres of the four alternatives. For any of the alternatives, mitigation measures will be needed to reduce greenhouse gas emissions, increase carbon sequestration through reducing development impacts on ecosystems and water resources, and improve resiliency to climate impacts.

## Development Patterns

Measure	Stay the Course	Transit Focused Growth	Reset Urban Growth	Preferred Growth Alternative
Growth in proximity to the urban growth boundary (population and employment within ¼ mile of both sides of the urban growth boundary)				
Growth in proximity to high-capacity transit station areas (percentage of population and employment growth in high-capacity transit station areas)				
Developed land (acres of land developed)				
Land use (overall judgement from SEIS land use analysis)				
Total				

## Observations on Development Pattern Measures

Of the development patterns measures listed above, Transit Focused Growth performs the best, followed closely by the Preferred Growth Alternative. These alternatives are expected to result in the lowest levels of growth on undeveloped, rural, and natural resource lands and in the highest levels of growth near high-capacity transit station areas. For any of the alternatives, mitigation measures will be needed to reduce land use impacts.

## Economy

Measure	Stay the Course	Transit Focused Growth	Reset Urban Growth	Preferred Growth Alternative
<b>Access to jobs</b> (jobs accessible per resident by travel mode: within a one-mile walk trip, 3-mile bike trip, or 45-minute transit trip)				
<b>Jobs-housing balance</b> (jobs-housing ratio indexed to regional average)				
<b>Total</b>				

## Observations on Economy Measures

Of the economy measures listed above, Transit Focused Growth performs the best, followed closely by the Preferred Growth Alternative and Reset Urban Growth. Regionwide, these alternatives are expected to result in more jobs being accessible by walking, biking, and transit and a more balanced ratio of jobs to housing compared to Stay the Course.

Some variation by county exists. Job accessibility by biking in Kitsap and Pierce counties is highest under Stay the Course. For any of the alternatives, mitigation measures will be needed to increase economic benefits and reduce impacts.

# Environment

Measure	Stay the Course	Transit Focused Growth	Reset Urban Growth	Preferred Growth Alternative
<b>Air quality</b> (quantity of pollutants of concern)				
<b>Ecosystems</b> (overall judgement from SEIS ecosystems analysis)				
<b>Water quality</b> (overall judgement from SEIS water quality analysis)				
<b>Noise</b> (overall judgement from SEIS noise analysis)				
<b>Earth</b> (overall judgement from SEIS earth analysis)				
<b>Visual/aesthetic quality</b> (overall judgement from SEIS visual and aesthetic resources analysis)				
<b>Historic and cultural resources</b> (overall judgement from SEIS historic, cultural, and archaeological resources analysis)				
See <b>climate</b> section for climate change criteria				
<b>Total</b>				

## Observations on Environment Measures

Of the environment measures listed above, Transit Focused Growth performs the best overall, followed closely by the Preferred Growth Alternative. Regionwide, these alternatives are expected to have fewer impacts on air quality, ecosystems, water quality, visual resources and aesthetics, and climate change.

Impacts on noise, earth, and historic and cultural resources would be similar for all alternatives. For any of the alternatives, mitigation measures will be needed to reduce environmental impacts.

# Equity

Measure	Stay the Course	Transit Focused Growth	Reset Urban Growth	Preferred Growth Alternative
Population growth in areas of higher displacement risk (overall and in equity geographies)				
Transportation benefits in equity geographies (vehicle miles and minutes traveled, access to jobs by travel mode, commute trips by mode share, delay)				
Moderate-density housing in equity geographies				
Jobs-housing balance in equity geographies (jobs-housing ratio indexed to regional average)				
Growth in high-capacity transit station areas in equity geographies (percentage of population and employment growth in high-capacity transit station areas)				
Total				

## Observations on Equity Measures

Of the equity measures listed above, Transit Focused Growth performs the best overall, followed by the Preferred Growth Alternative. Most of the measures focus on equity geographies, which are census tracts with greater than 50 percent people of color and greater than 50 percent people with low incomes. In these geographies, Transit Focused Growth and the Preferred Growth Alternative are expected to have greater benefits for transportation, moderate-density housing, jobs-housing balance, and support for transit-oriented development.

One equity measure evaluates displacement risk. Displacement is occurring in the region, and displacement risk exists with all of the alternatives. Regionwide, Stay the Course and Reset Urban Growth are expected to allocate the lowest proportion of growth in areas of higher displacement risk (17 percent), followed by the Preferred Growth Alternative (22 percent), and Transit Focused Growth (23 percent).

Rankings at the county level are somewhat different. For displacement risk in King County overall, Reset Urban Growth is expected to allocate the lowest population growth in areas of higher displacement risk (25 percent), followed by Stay the Course (26 percent), the Preferred Growth Alternative (31 percent), and Transit Focused Growth (32 percent). For displacement risk in Kitsap County overall, Reset Urban Growth is expected to allocate the lowest population

growth in areas of higher displacement risk (3 percent), followed by Stay the Course (4 percent), the Preferred Growth Alternative (9 percent), and Transit Focused Growth (20 percent). For displacement risk in Pierce County overall, Reset Urban Growth is expected to allocate the lowest population growth in areas of higher displacement risk (10 percent), followed by the other three alternatives (13 percent). For displacement risk in Pierce County overall, Reset Urban Growth is expected to allocate the lowest population growth in areas of higher displacement risk (10 percent), followed by the other three alternatives which are tied at 13 percent. For displacement risk in Snohomish County overall, Reset Urban Growth is expected to allocate the lowest population growth in areas of higher displacement risk (11 percent), followed by Transit Focused Growth (12 percent), the Preferred Growth Alternative (13 percent), and Stay the Course (14 percent).

In equity geographies, Stay the Course allocates the lowest proportion growth in areas of higher displacement risk, followed by Reset Urban Growth, then the Preferred Growth Alternative.

Growth in areas with high displacement risk can also have tradeoffs. Growth can displace residents or could also provide beneficial opportunities for people who are able to stay in their neighborhood, such as greater access to jobs and services and expanded housing choices where demand is highest. This measure may be particularly helpful in identifying mitigation needed across all alternatives studied.

Mitigation for displacement is needed throughout the region for all alternatives. Even in areas that show lower displacement risk, displacement risk still exists and should be identified and mitigated.

## Health

Measure	Stay the Course	Transit Focused Growth	Reset Urban Growth	Preferred Growth Alternative
<b>Potential for reducing automobile injuries</b> (average daily minutes traveled by residents)				
<b>Potential for physical activity</b> (jobs accessible per resident by travel mode: within a one-mile walk trip, 3-mile bike trip, or 45-minute transit trip)				
<b>Air and water pollution</b> (overall judgement from SEIS air and water quality analyses)				
<b>Environmental health</b> (overall judgement from SEIS environmental health analysis)				
<b>Access to parks</b> (growth near parks providing local urban access)				
<b>Total</b>				

## Observations on Health Measures

Of the health measures listed above, Transit Focused Growth performs the best, followed by the Preferred Growth Alternative. These alternatives are expected to have greater potential for reducing automobile injuries and increasing physical activity, lower levels of air and water pollution, lower environmental health impacts, and better access to parks.

Variation by county for some of the measures exist. In King County, Reset Urban Growth shows more jobs accessible for the three modes than Stay the Course. In Kitsap and Pierce counties, Stay the Course shows more jobs accessible by bike than the other three alternatives. For jobs accessible by transit in Pierce County, Stay the Course performs better than the Preferred Growth Alternative and Reset Urban Growth. For jobs accessible by walking in Pierce County, Stay the Course performs the same as the Preferred Growth Alternative and better than Reset Urban Growth.

For Snohomish County, population growth near parks is highest for Stay the Course compared to the other three alternatives. Adding additional parks where growth is planned would mitigate for this lack of park access. Additional mitigation for all alternatives will be needed to increase health benefits and reduce impacts.

## Housing

Measure	Stay the Course	Transit Focused Growth	Reset Urban Growth	Preferred Growth Alternative
Moderate-density housing				
Jobs-housing balance (jobs-housing ratio indexed to regional average)				
Population growth in areas of higher displacement risk				
Total				

## Observations on Housing Measures

Of the housing measures listed above, Reset Urban Growth performs the best, followed closely by Transit Focused Growth and the Preferred Growth Alternative, which are tied. Regionwide, Transit Focused Growth is expected to result in the highest level of moderate-density housing, followed by the Preferred Growth Alternative and Stay the Course. Transit Focused Growth, the Preferred Growth Alternative, and Reset Urban Growth similarly improve jobs-housing balance. Reset Urban Growth and Stay the Course show the lowest proportions of growth in areas of higher displacement risk, followed by the Preferred Growth Alternative.

Variation by county for some of the measures exist. In Pierce County, the Preferred Growth Alternative, Stay the Course, and Transit Focused Growth show the same proportion of growth in areas of higher displacement risk (13 percent). In Snohomish County, Stay the Course

shows a slightly higher proportion of growth (14 percent) in areas of higher displacement risk compared to Transit Focused Growth (12 percent) and the Preferred Growth Alternative (13 percent). Mitigation for housing and displacement is needed throughout the region for all alternatives.

## Public Services

Measure	Stay the Course	Transit Focused Growth	Reset Urban Growth	Preferred Growth Alternative
<b>Public services and utilities</b> (overall judgement from SEIS public services and utilities analysis)				
<b>Energy use</b> (overall judgement from SEIS energy analysis)				
<b>Parks and recreation</b> (overall judgement from SEIS parks and recreation analysis)				
<b>Total</b>				

## Observations on Public Services Measures

Of the public services measures listed above, Transit Focused Growth generally performs the best, followed by the Preferred Growth Alternative. The alternatives are expected to result in the lowest levels of energy use, the fewest public services and utilities impacts, and the greatest parks and recreation access. Mitigation and funding are needed for all of the alternatives to avoid impacts and provide needed public services and utilities.

## Transportation

Measure	Stay the Course	Transit Focused Growth	Reset Urban Growth	Preferred Growth Alternative
<b>Vehicle miles traveled</b> (average daily vehicle miles traveled per resident)				
<b>Vehicle minutes traveled</b> (average daily vehicle minutes traveled per resident)				
<b>Delay</b> (average annual hours of delay per resident)				
<b>Transit ridership</b> (annual transit boardings)				
<b>Mode share, non-commute trips</b> (SOV, non-vehicle shares)				
<b>Jobs accessible per resident by travel mode</b> (within a one-mile walk trip, 3-mile bike trip, or 45-minute transit trip)				
<b>Total</b>				

### Observations on Transportation Measures

Of the transportation measures listed above, Transit Focused Growth performs the best, followed by the Preferred Growth Alternative. These alternatives are expected to result in the lowest levels of vehicle miles traveled, vehicle minutes traveled, and delay, and greatest levels of transit ridership, non-SOV trips, and jobs accessible by walking, biking, and transit. For all alternatives, mitigation measures and further planning and development of transportation improvements, such as station area planning and access projects, are needed to reduce impacts and maximize benefits.

Variation by county for some of the measures exist. In King County, Reset Urban Growth shows lower average daily vehicle miles traveled by residents compared to Stay the Course. For Kitsap County, Stay the Course and Transit Focused Growth have the lowest average daily vehicle miles traveled by residents (both 11.5 miles) compared to the Preferred Growth Alternative (11.8 miles) and Reset Urban Growth (12.2 miles).

In Kitsap County, Stay the Course shows more delay (19.4 hours) than Reset Urban Growth (17.4 hours), in part due to higher population and employment allocation to Kitsap County in the Stay the Course Alternative. In Snohomish County, Stay the Course shows slightly more delay (41 hours) than Reset Urban Growth (40.4 hours).

Kitsap Transit shows more transit boardings for Stay the Course than the other three alternatives. Community Transit shows more transit boardings for Stay the Course than Reset Urban Growth. Everett Transit shows more transit boardings for Stay the Course (4.8), followed by the Preferred Growth Alternative (4.7), Transit Focused Growth (4.6), and Reset Urban Growth (4.1).

In King County, Reset Urban Growth and the Preferred Growth Alternative show the same number of jobs accessible by walking. In Kitsap County, Transit Focused Growth shows the most jobs accessible by transit and walking, followed by Stay the Course, the Preferred Growth Alternative, and Reset Urban Growth. For jobs accessible by bike in Kitsap County, all of the alternatives perform the same.

In Pierce County, Transit Focused Growth shows the most jobs accessible by transit, followed by Stay the Course, the Preferred Growth Alternative, and Reset Urban Growth. For jobs accessible by walking in Pierce County, Transit Focused Growth performs the best and the Preferred Growth Alternative and Stay the Course are tied for next best. For jobs accessible by bike in Pierce County, Stay the Course performs best, followed by Transit Focused Growth, the Preferred Growth Alternative, and Reset Urban Growth.

In Snohomish County, Transit Focused Growth shows the most jobs accessible by transit, followed by the Preferred Growth Alternative, Stay the Course, and Reset Urban Growth.

## Summary

The table below summarizes the performance of the alternatives by criteria category. The best performing alternative for each category is the one that has the best relationship to the highest number of measures in the category (see total rows for each category). Transit Focused Growth performs the best in all categories except Housing, in which Reset Urban Growth performs the best. The Preferred Growth Alternative performs second best in all categories.

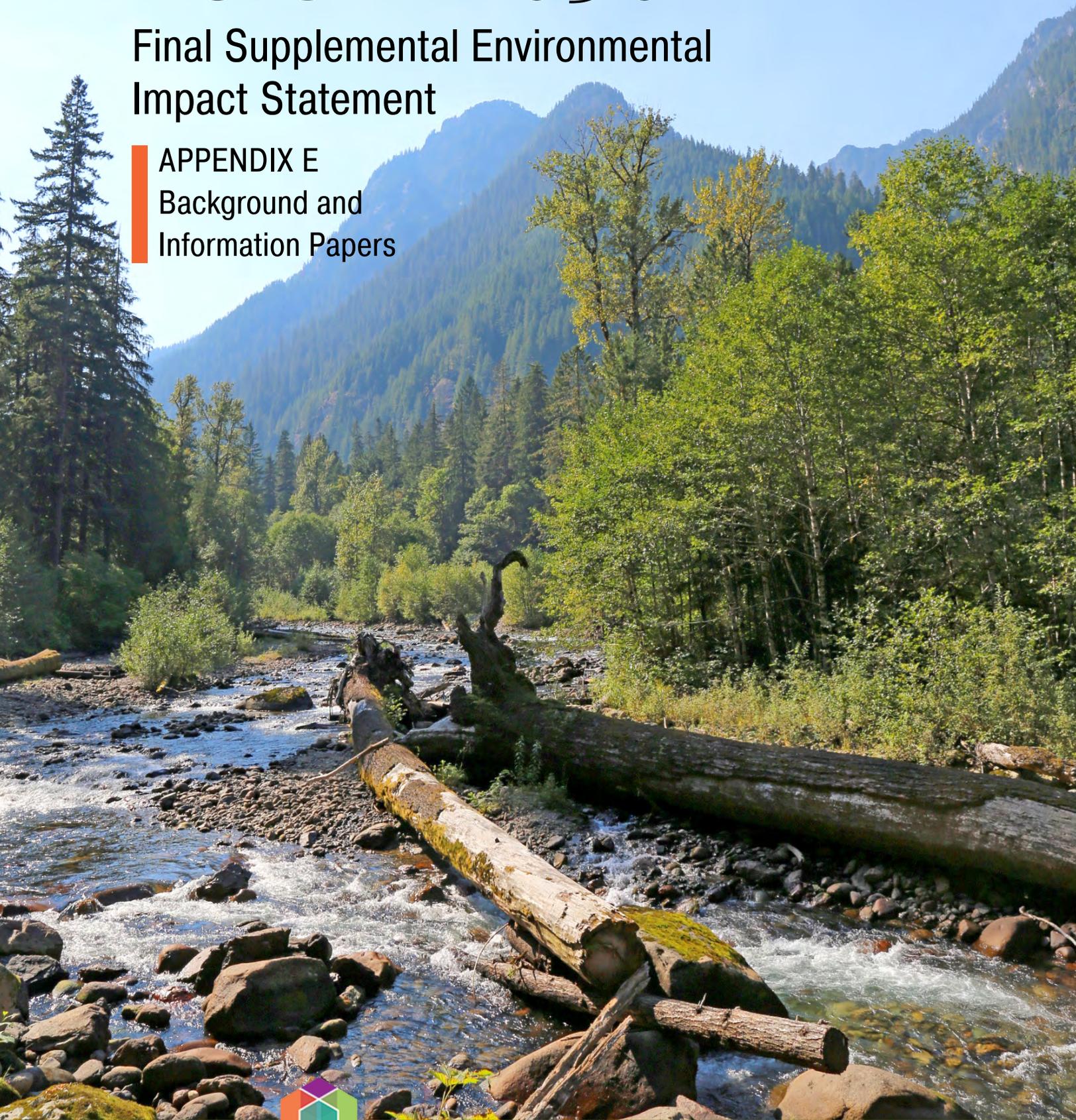
Category	Regional Outcome	Best Performing Alternative
Climate Change	Climate, Resilience	Transit Focused Growth
Development Patterns	Rural Areas	Transit Focused Growth
Economy	Economy, Innovation	Transit Focused Growth
Environment	Environment, Natural Resources	Transit Focused Growth
Equity	Community and Culture, Equity	Transit Focused Growth
Health	Health	Transit Focused Growth
Housing	Housing	Reset Urban Growth
Public Services	Public Facilities and Services	Transit Focused Growth
Transportation	Mobility and Connectivity	Transit Focused Growth



# VISION 2050

## Final Supplemental Environmental Impact Statement

APPENDIX E  
Background and  
Information Papers





# Appendix E: Background and Information Papers

*This appendix includes an overview of the background papers and other resources used to inform specific policy areas.*

## Overview

PSRC developed background papers for a variety of topics related to VISION 2050. These papers address topics raised during the scoping process that took place in 2018 and present information, research, and data trends that help to shape VISION 2050. The background papers are included in this appendix. In addition, other projects and papers, such as the Regional Centers Framework Update project and Regional Open Space Conservation Plan, have provided further information on regional planning topics. Information papers can be accessed online via the links provided.

Information and recommendations contained in these papers has been used in developing the Final SEIS. Below is a summary of each of the background and information papers.

## Background Papers

**Annexation** – This paper provides background context on the annexation process, challenges to annexation, and related policy considerations for VISION 2050. Published December 2018. Link: <https://www.psrc.org/sites/default/files/vision2050annexationpaper.pdf>

**Climate** – The purpose of this background paper is to summarize information on regional climate change issues. It provides an overview of state and regional actions, sources of greenhouse gases, impacts from climate change, and current and potential regional strategies to address mitigation and resilience. Link: <https://www.psrc.org/sites/default/files/vision2050climatepaper.pdf>

**Equity** – This paper provides background on PSRC’s work on equity to date and provides additional information from peer organizations. It identifies the products PSRC will develop as part of VISION 2050 and considerations for how equity could be addressed in VISION 2050 and future PSRC work. Link: <https://www.psrc.org/sites/default/files/rsc-vision-2050-equitybriefingpaper-10jan2019.pdf>

**Freight** – This paper highlights the intersection between freight and land use. It encourages jurisdictions to consider freight during the planning process to ensure that future growth and infrastructure will support mobility for people and goods throughout the region. Link: <https://www.psrc.org/sites/default/files/v2050-freight-paper.pdf>

**Health** – This paper summarizes human health in the region and includes discussion on overall trends, health disparities, healthy planning strategies, and stakeholder input related to health. It

also provides policy considerations for VISION 2050. Published December 2018. Link:  
<https://www.psrc.org/sites/default/files/vision2050healthpaper.pdf>

**Housing** – This paper reviews current policy frameworks, recent housing initiatives, and a range of housing tools to consider in developing VISION 2050. Published June 2018. Link:  
[https://www.psrc.org/sites/default/files/vision\\_2050\\_housing\\_background\\_paper.pdf](https://www.psrc.org/sites/default/files/vision_2050_housing_background_paper.pdf)

**Regional Growth Strategy** – The Regional Growth Strategy is the long-range approach in VISION 2040 for the distribution of population and employment growth within the four-county central Puget Sound region. This paper provides background, data, and policy context to consider as PSRC extends VISION 2040 to 2050 and develops growth strategy alternatives for environmental review. Published March 2019. Link:  
<https://www.psrc.org/sites/default/files/rgs-background-paper.pdf>

**Technology** – This paper describes the connections between transportation technologies and land use. Jurisdictions are encouraged to consider the impacts from various new mobility options and these new technologies during the planning process. Technology considerations for land use planning are included for topics such as parking, right-of-way and access management, infrastructure, and development patterns. Link:  
<https://www.psrc.org/sites/default/files/vision2050technologypaper.pdf>

**VISION 2050 Alternatives** – This paper supplements the Regional Growth Strategy background paper and provides additional information on growth that may help inform development or selection of a preferred growth alternative. Link:  
<https://www.psrc.org/sites/default/files/vision2050alternativespaper.pdf>

## **Information Papers, Strategies, and Plans**

**Amazing Place: Growing Jobs and Opportunity in the Central Puget Sound Region** – Amazing Place, the Regional Economic Strategy, identifies key sectors of the regional economy that are driving the region’s job growth. It then establishes goals, strategies, initiatives, and implementation actions to sustain growth in key sectors and the overall economy. Published September 2017. Link:  
<https://www.psrc.org/sites/default/files/amazingplacestrategy.pdf>

**Central Puget Sound Region Demographic Profile** – The profile presents updated current demographic data describing the central Puget Sound region to identify population groups and communities to be considered for subsequent environmental justice analyses and activities. Published October 2018. Link:  
<https://www.psrc.org/sites/default/files/demographicprofile.pdf>

**Displacement Risk Mapping Technical Documentation** – With technical guidance from local experts and partners, PSRC developed a tool to identify places in the central Puget Sound region where people and businesses may be at risk of displacement. This tool, called Displacement Risk Mapping, combines the data of local community characteristics into an index that classifies areas as having lower, moderate, or higher risk of displacement based on

current neighborhood conditions. This paper describes the methodology and data used to develop this mapping tool. Link: <https://www.psrc.org/sites/default/files/displacementrisk.pdf>

**Growing Transit Communities Strategy** – This initiative focused on equitable development outcomes in high -capacity transit station areas to benefit both existing and future residents. The strategy outlined actions for PSRC, transit agencies, local governments, and other stakeholders. Published in October 2013. Link: <https://www.psrc.org/sites/default/files/gtcstrategy.pdf>

**Opportunity Mapping Technical Addendum** – To better understand access to opportunities within the four-county region, PSRC’s Opportunity Mapping presents a geographic analysis of where opportunity-rich and opportunity-poor neighborhoods exist. The index uses a variety of data as indicators to assess regional measures of educational attainment, economic health, neighborhood and housing quality, mobility and transportation, and public and environmental health. This paper describes the methodology and data used to develop this mapping tool. Link: <https://www.psrc.org/sites/default/files/opportunitymapping.pdf>

**Planning for Whole Communities Toolkit** – The Toolkit is divided into 25 resource guides describing specific tools and how to put them to work at the local level. The resource guides help to connect the dots between planning and health, equity, and sustainability efforts, and provide new and innovative ways to think about plans and policies in relation to health. Published July 2014. Link: [https://www.psrc.org/sites/default/files/compilations\\_final\\_final.pdf](https://www.psrc.org/sites/default/files/compilations_final_final.pdf)

**Regional Centers Framework Update** – Centers guide regional growth allocations, advance local planning, inform transit service planning, and represent priority areas for PSRC’s federal transportation funding. The Regional Centers Framework outlines a revised structure and criteria for regional and countywide centers and direction to update policies and procedures to update to the regional centers framework. Published March 2018. Link: [https://www.psrc.org/sites/default/files/final\\_regional\\_centers\\_framework\\_march\\_22\\_version.pdf](https://www.psrc.org/sites/default/files/final_regional_centers_framework_march_22_version.pdf)

**Regional Open Space Conservation Plan** – This plan envisions a complete regional open space network that enhances the region’s many open space resources. The plan maps out the region’s open space network, identifies the parts of the network that are already protected, highlights remaining conservation needs, and presents an action plan. Published June 2018. Link: <https://www.psrc.org/sites/default/files/regionalopenspaceconservationplan.pdf>

**Regional Transportation Plan—2018** – This plan maps a regional transportation system that would catch up and keep pace with expected growth. It outlines investments the region is making to improve highway, transit, rail, ferry, bicycle, and pedestrian systems to support the safe and efficient movement of people and goods. Published May 2018. Link: <https://www.psrc.org/sites/default/files/rtp-may2018.pdf>

**Taking Stock 2016: Regional and Local Perspectives on Local Plan Updates and VISION 2040 Implementation** – Taking Stock 2016 is an assessment of the collective efforts of the region’s counties and cities to implement VISION 2040 and looks ahead to the next update of VISION 2040. This report highlights key VISION 2040 strategies that are positively influencing local plans and shaping the region as well as strategies and tools that require additional work. Published March 2017. Link: <https://www.psrc.org/sites/default/files/takingstock.pdf>



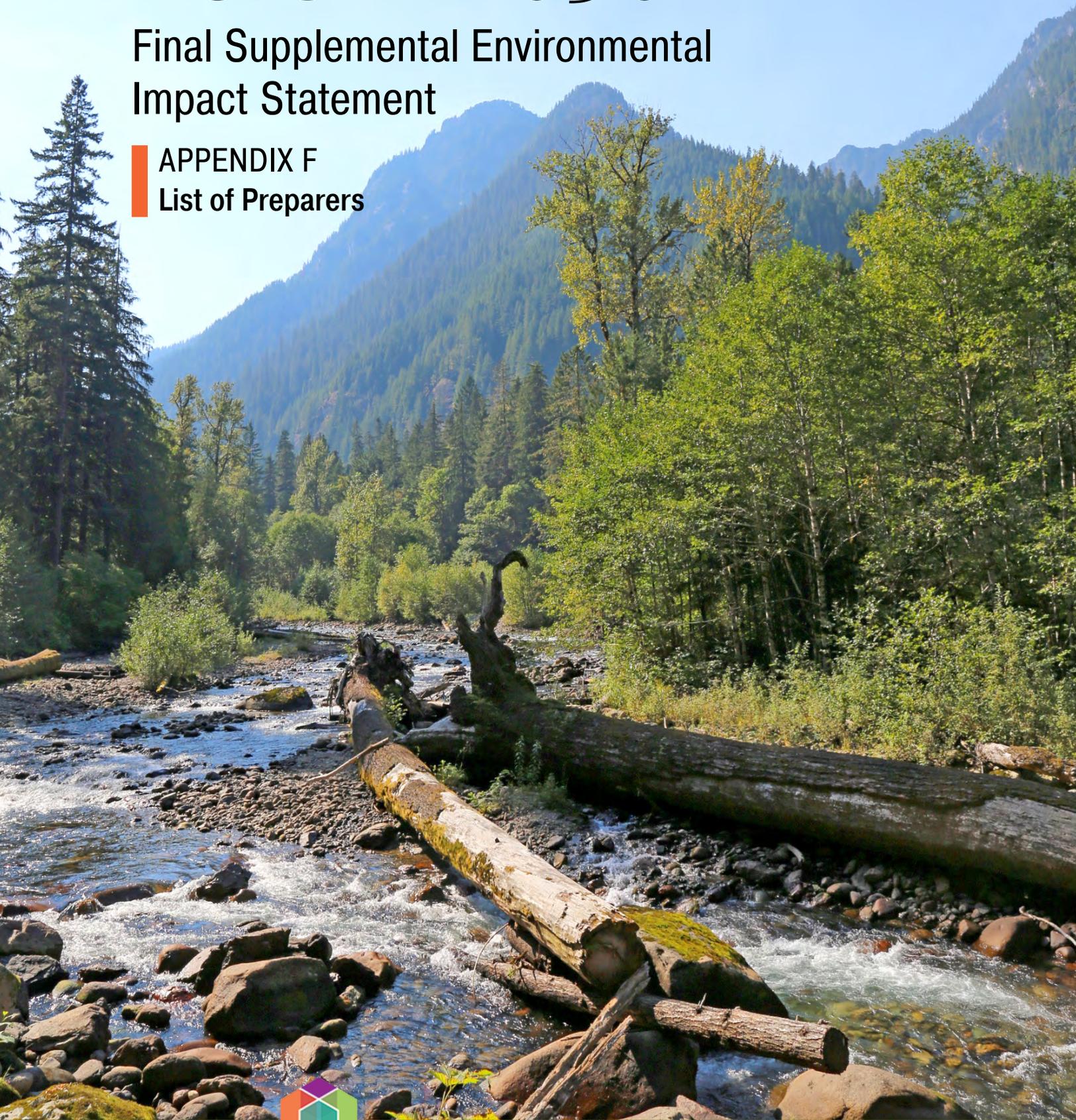
PSRC

# VISION 2050

## Final Supplemental Environmental Impact Statement

APPENDIX F

List of Preparers





# Appendix F: List of Preparers

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Program Manager

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Associate Modeler

Charles Patton  
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Parametrix, Documentation Specialist

Brian Woodburn, PE  
Parametrix, Transportation Planner

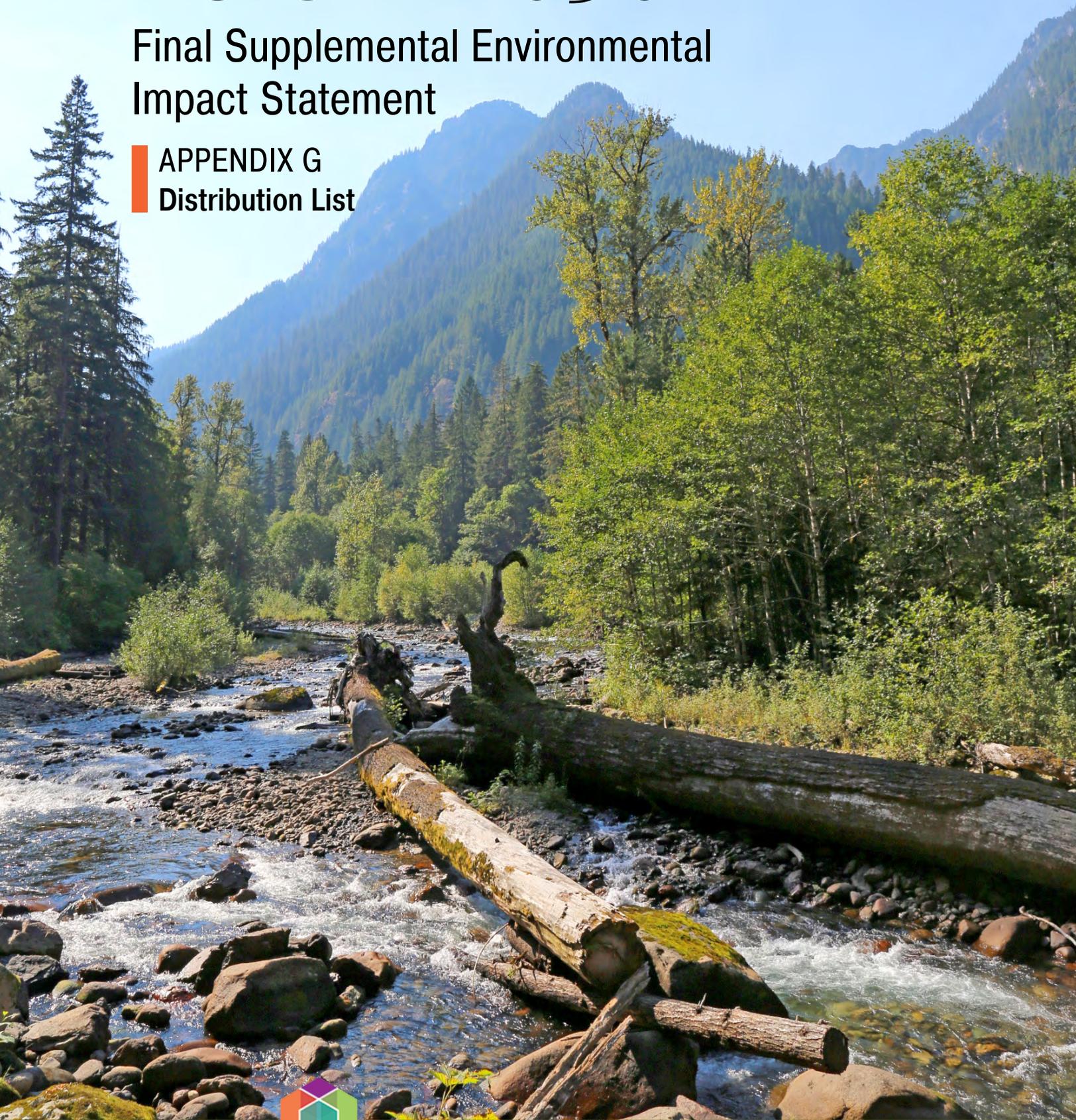
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Claire Woodman, AICP  
Parametrix, Environmental Planner

# VISION 2050

## Final Supplemental Environmental Impact Statement

**APPENDIX G**  
**Distribution List**





# Appendix G: Distribution List

*This appendix consists of the list of stakeholders that were sent a notice of availability of this Final SEIS. Additional copies are available through the PSRC's Information Center, <https://www.psrc.org/contact-center/information-center>, 206-464-7532.*

## **PSRC Board and Committee Members:**

Executive Board  
Growth Management Policy Board  
Transportation Policy Board  
Economic Development District Board  
Regional Staff Committee

## **Counties:**

Chelan County	Lewis County
Clallam County	Mason County
Island County	Pierce County
Jefferson County	Skagit County
King County	Snohomish County
Kitsap County	Thurston County
Kittitas County	Yakima County

## **Cities & Towns:**

Algona	Enumclaw	Monroe	Stanwood
Arlington	Everett	Mountlake Terrace	Steilacoom
Auburn	Federal Way	Mukilteo	Sultan
Bainbridge Island	Fife	Newcastle	Sumner
Beaux Arts Village	Fircrest	Normandy Park	Tacoma
Bellevue	Gig Harbor	North Bend	Tukwila
Black Diamond	Gold Bar	Orting	University Place
Bonney Lake	Granite Falls	Pacific	Wilkeson
Bothell	Hunts Point	Port Orchard	Woodinville
Bremerton	Index	Poulsbo	Woodway
Brier	Issaquah	Puyallup	Yarrow Point
Buckley	Kenmore	Redmond	
Burien	Kent	Renton	
Carbonado	Kirkland	Roy	
Carnation	Lake Forest Park	Ruston	
Clyde Hill	Lake Stevens	Sammamish	
Covington	Lakewood	SeaTac	
Darrington	Lynnwood	Seattle	
Des Moines	Maple Valley	Shoreline	
DuPont	Marysville	Skykomish	
Duvall	Medina	Snohomish	
Eatonville	Mercer Island	Snoqualmie	
Edgewood	Mill Creek	South Prairie	
Edmonds	Milton		

**Federal Agencies:**

Bureau of Reclamation  
Federal Aviation Administration  
Federal Emergency Management Agency  
Federal Highways Administration  
Federal Transit Administration  
National Marine Fisheries Service  
National Oceanic and Atmospheric Administration  
National Park Service  
U.S. Army: Joint Base Lewis-McChord  
U.S. Army Corps of Engineers  
U.S. Department of Agriculture  
U.S. Department of Housing and Urban Development  
U.S. Bureau of Indian Affairs  
U.S. Bureau of Land Management  
U.S. Department of Interior  
U.S. Department of Transportation  
U.S. Environmental Protection Agency  
U.S. Fish and Wildlife Service  
U.S. Forest Service  
U.S. Geological Survey  
U.S. Navy

**Regional Agencies:**

Benton Franklin Regional Council  
Cowlitz-Wahkiakum Council of Governments  
Grays Harbor Council of Governments  
King County Growth Management Planning Council  
Kitsap Regional Coordinating Council  
Kitsap Regional Planning Commission  
Pierce County Regional Council  
Puget Sound Clean Air Agency  
Skagit Council of Governments  
Snohomish County Tomorrow  
Sound Cities Association  
SW Washington Regional Transportation Council  
Spokane Regional Transportation Council  
Thurston Regional Planning Council  
Whatcom County Council of Government  
Yakima Valley Conference of Government

**Ports:**

Northwest Seaport Alliance  
Port of Bremerton  
Port of Edmonds  
Port of Everett  
Port of Kingston  
Port of Seattle  
Port of Tacoma

**State Agencies:**

Department of Agriculture  
Department of Archaeology and Historic Preservation  
Department of Commerce  
Department of Corrections  
Department of Ecology, SEPA Unit  
Department of Environmental Services  
Department of Fish and Wildlife  
Department of Health  
Department of Natural Resources  
Department of Social and Health Services  
Department of Transportation  
Office of the Attorney General  
Office of the Governor  
Parks and Recreation Commission  
Puget Sound Partnership  
Recreation and Conservation Office  
Transportation Improvement Board  
Washington State Ferries  
Washington State Parks  
Washington State Utilities & Transportation Commission

**Transit Agencies:**

Community Transit  
Everett Transit  
Intercity Transit  
Island Transit  
King County Metro Transit  
Kitsap Transit  
Pierce Transit  
Sound Transit

**Tribes:**

Duwamish Tribal Office  
Muckleshoot Indian Tribe  
Nisqually Indian Tribe  
Northwest Indian Fisheries Commission  
Port Gamble S’Klallam Tribe  
Puyallup Tribe of Indians  
Sauk-Suiattle Indian Tribe  
Snoqualmie Indian Tribe  
Steilacoom Tribe  
Stillaguamish Tribe of Indians  
Suquamish Tribe  
Tulalip Tribes

**Utilities:**

Alderwood Water & Wastewater District  
Bonneville Power Administration  
Cascade Natural Gas  
Cascade Water Alliance  
Kitsap Public Utility District  
Northwest Power and Conservation Council  
Peninsula Light Company  
Pierce County Department of Utilities  
Puget Sound Energy  
Seattle City Light  
Seattle Public Utilities  
Snohomish County Public Utility District  
Soos Creek Water and Sewer District  
Spanaway Water Company  
Tacoma Power  
Tacoma Public Utilities  
Washington Association of Sewer and Water  
Districts  
Water Supply Forum

**Libraries:**

Everett Public Library  
King County Library System for Distribution at:  
    Bellevue Library  
    Bothell Library  
    Burien Library  
    Covington Library  
    Federal Way Library  
    Issaquah Library  
    Kent Library  
    Redmond Library  
    Renton Library  
    Shoreline Library  
    Woodinville Library  
Kitsap Regional Library  
Pierce County Public Library for Distribution at:  
    Lakewood Public Library  
    South Hill Library  
Puyallup Public Library  
Seattle Public Library  
Seattle University  
Sno-Isle Regional Library for Distribution at:  
    Lynnwood Library  
    Marysville Library  
    Snohomish Library  
Sound Transit Research Library  
Tacoma Public Library  
University of Washington  
Washington State Library  
WSDOT Library

**School Districts:**

Arlington School District No. 16  
Auburn School District No. 408  
Bainbridge Island School District No. 303  
Bellevue School District No. 405  
Bethel School District No. 403  
Bremerton School District No. 100-C  
Carbonado School District No. 19  
Central Kitsap School District No. 401  
Clover Park School District No. 400  
Darrington School District No. 330  
Dieringer School District No. 343  
Eatonville School District No. 404  
Edmonds School District No. 15  
Enumclaw School District No. 216  
Everett School District No. 2  
Federal Way School District No. 210  
Fife School District No. 417  
Franklin Pierce School District No. 402  
Granite Falls School District No. 332  
Highline School District No. 401  
Index School District No. 63  
Issaquah School District No. 411  
Kent School District No. 415  
Lake Stevens School District No. 4  
Lake Washington School District No. 414  
Lakewood School District No. 306

Marysville School District No. 25  
Mercer Island School District No. 400  
Monroe School District No. 103  
Mukilteo School District No. 6  
North Kitsap School District No. 400  
Northshore School District No. 417  
Orting School District No. 344  
Peninsula School District No. 401  
Puyallup School District No. 3  
Renton School District No. 403  
Riverview School District No. 407  
Seattle School District No. 1  
Shoreline School District No. 412  
Skykomish School District No. 404  
Snohomish School District No. 201  
Snoqualmie Valley School District No. 410  
South Kitsap School District No. 402  
Stanwood-Camano School District No. 401  
Steilacoom Historical School District No. 1  
Sultan School District No. 311  
Sumner School District No. 320  
Tacoma School District No. 10  
Tahoma School District No. 409  
Tukwila School District No. 406  
University Place School District No. 83  
Vashon Island School District No. 402  
White River School District No. 416

**Academic/Community/Environmental:**

7-Lakes  
37th LD Environment and Climate Caucus  
350 Everett  
350 Seattle  
4Culture  
AARP  
ACES Northwest Network  
American Farmland Trust  
ARCH  
Bates College  
Bellevue College  
Bellevue Downtown Association  
Bellwether Housing  
Bicycle Alliance of Washington  
Black Hills Audubon Society  
Bremerton Housing Authority  
Cascade Bicycle Club  
Climate Solutions

CommenSpace  
Communities of Concern Commission  
Conservation Northwest  
Daniel J. Evans School of Public Affairs  
Downtown Transportation Alliance/Commute Seattle  
El Centro de la Raza  
Emerald Alliance  
Enumclaw Plateau Community Association  
Escala Condominium  
Ethnic Unity Coalition  
Executive Alliance  
Everett Community College  
Everett Housing Authority  
Everett Station District Alliance  
Feet First  
ForeverGreen Trails  
Forterra  
Futurewise  
Greater Maple Valley Unincorporated Area Council

Green Valley/Lake Holm Association  
 Highline Community College  
 Hollywood Hill Association  
 Homesight  
 Hopelink  
 Housing Authority of Snohomish County  
 Housing Development Consortium of Seattle-King  
 County  
 Housing Kitsap  
 Imagine Housing  
 Intercommunity Mercy Housing  
 Interfaith Association of Snohomish County  
 King Conservation District  
 King County Housing Authority  
 Kingston Citizens Advisory Council - Transportation  
 Committee  
 Kitsap Alliance of Property Owners  
 Kitsap Community and Agricultural Alliance  
 Kitsap Conservation District  
 Kitsap County Democrats Central Committee  
 Kitsap County Health District  
 Korean Women's Association  
 Las Americas Business Center  
 League of Women Voters  
 League of Women Voters of Snohomish County  
 League of Women Voters of Washington State  
 Low Income Housing Institute  
 Metro Parks Tacoma  
 Mountains To Sound Greenway  
 Municipal League  
 National Association for the Advancement of Colored  
 People  
 National Wildlife Federation  
 Nature Conservancy  
 North Seattle College  
 Olympic College  
 OneAmerica  
 Paratransit Services of Pierce County  
 Partnership for Rural King County  
 Peninsula School Board  
 People for Puget Sound  
 Pierce Conservation District  
 Pierce County Housing Authority  
 Pilchuck Audubon Society  
 Pomegranate Center  
 Public Health Seattle & King County  
 Puget Sound Sage  
 Puget Sound School Coalition  
 Puyallup Watershed Alliance  
 Refugee Forum  
 Regional Commission on Airport Affairs  
 Renton Housing Authority  
 Save Black Diamond  
 Seattle Chinatown International District Preservation  
 and Development Authority  
 Seattle Freight Advisory Board  
 Seattle Housing Authority  
 Seattle Pacific University  
 Seattle University  
 Sierra Club  
 Sierra Club, Washington Chapter  
 Sightline  
 Snohomish Conservation District  
 Snohomish Health District  
 South Sound Military & Communities Partnership  
 Tacoma Area Coalition of Individuals with Disabilities  
 Tacoma Housing Authority  
 Tacoma-Pierce County Health Department  
 Tahoma Audubon Society  
 Transportation Choices Coalition  
 Trust for Public Land  
 United Way of Pierce County  
 United Way of Snohomish County  
 University of Puget Sound  
 University of Washington  
 University of Washington, Bothell  
 University of Washington, Climate Impacts Group  
 University of Washington, Department of Urban  
 Design & Planning  
 University of Washington, Tacoma  
 Upper Bear Creek Unincorporated Area Council  
 Vashon-Maury Island Community Council  
 Washington Audubon  
 Washington Bikes  
 Washington Chapter American Planning Association  
 Washington Environmental Council  
 Washington State University  
 Washington State University, Everett  
 Washington Toxics Coalition  
 Whale and Dolphin Conservation  
 Wilderness Society  
 The William D. Ruckelshaus Center

**Business:**

AAA Washington  
AHBL Inc., Consultants  
AMTRAK  
Barclay's North Inc.  
BHC Consultants  
Bellevue Chamber of Commerce  
BNSF Railway Company  
Burnstead Construction  
Chinese Chamber of Commerce  
Economic Development Board for Tacoma-Pierce County  
Economic Development Council of Seattle & King County  
Economic Alliance Snohomish County  
enterpriseSeattle  
Everett Area Chamber of Commerce  
HDR, Inc.  
International Longshore and Warehouse Union Local 19  
Kemper Development Company  
Kirkland Sustainable Investments  
Kitsap Economic Development Alliance  
Laborers Local 242  
Lqh-Inc.  
LMN Architects  
Master Builders Association of King & Snohomish Counties  
Master Builders Association of Pierce County  
Makers Architects and Urban Design  
Michael Baker International  
Mithun Partners

Natural & Built Environments LLC  
Olympic Workforce Development Council  
Pacific Communications Consultants, Inc.  
Pacific Ridge Homes  
Pacifica Law Group  
Pertee Engineering Inc.  
Seattle 2030 District  
Seattle King County Realtors  
Seattle Metropolitan Chamber of Commerce  
SMWatts Consulting  
Snohomish County-Camano Association of Realtors  
Sustainable Redmond LLC  
Tacoma-Pierce County Chamber of Commerce  
Toyer Strategic Consulting  
Triangle Associates  
Union Pacific Railroad  
Vulcan Inc.  
Washington Association of Realtors  
Washington State Labor Council  
Weyerhaeuser  
Workforce Development Council of Seattle-King County  
Workforce Snohomish  
YWCA of Seattle-King County-Snohomish County

**Other:**

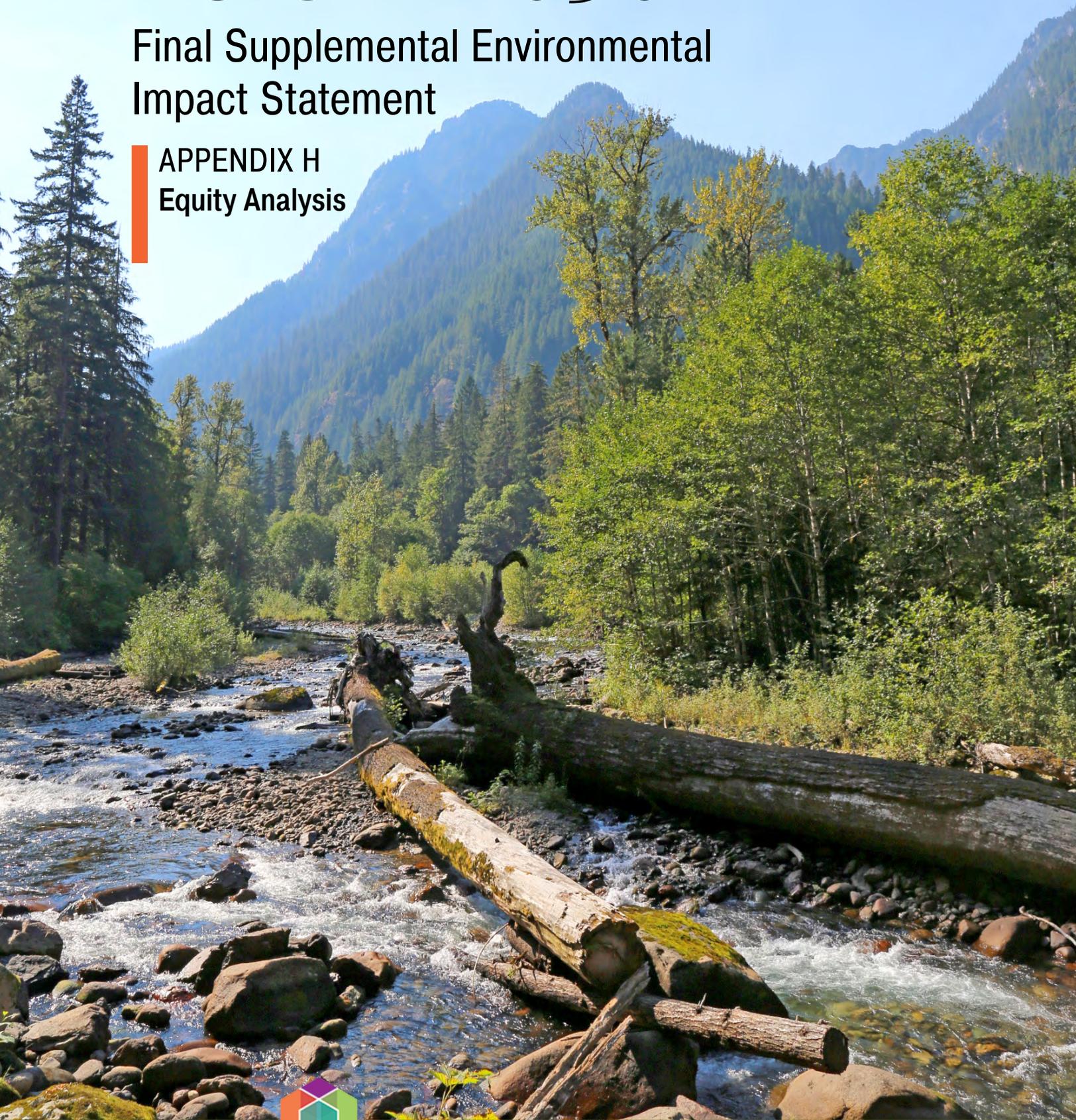
VISION 2040 and VISION 2050 Interested Parties  
(includes individuals)

# VISION 2050

## Final Supplemental Environmental Impact Statement



APPENDIX H  
Equity Analysis





# Appendix H: Equity Analysis

## Contents

Appendix H: Equity Analysis .....	H-1
<b>Part 1: Introduction .....</b>	<b>H-1</b>
VISION .....	H-1
Final Supplemental Environmental Impact Statement .....	H-2
Definitions .....	H-3
<b>Part 2: Existing Conditions .....</b>	<b>H-5</b>
Regional Demographics.....	H-5
Housing Affordability and Transportation.....	H-11
Centers and Station Areas.....	H-21
Equity Geographies .....	H-27
<b>Part 3: Alternatives Analysis .....</b>	<b>H-33</b>
Description of Alternatives.....	H-33
Population.....	H-34
Employment and Housing .....	H-37
Land Use.....	H-48
Transportation .....	H-53
Public Services and Utilities, Energy .....	H-61
Parks and Recreation.....	H-62
Environmental Health .....	H-67
Climate Change.....	H-68
Growth in Opportunity Areas.....	H-69
Growth in Areas at Higher Risk of Displacement .....	H-73
<b>Part 4: Findings and Next Steps.....</b>	<b>H-81</b>
<b>Part 5: Demographic Maps .....</b>	<b>H-84</b>



PSRC

# Appendix H: Equity Analysis

## Part 1: Introduction

### VISION

VISION 2040 is the region’s prior plan for managing growth forecast through the year 2040. The plan includes overarching goals, an environmental framework, a strategy to sustainably guide growth in the region, and multicounty planning policies. It also includes implementation actions at the regional, county, and local levels. As required under the state Growth Management Act (GMA), VISION 2040 has policy chapters addressing the environment, development patterns, housing, the economy, transportation, and public services.

The region has had important successes implementing VISION 2040. At the same time, the region continues to face challenges, including the rising cost of housing and increased travel times that can reduce access to jobs and services. While recent economic growth has been at historic levels, prosperity has not benefited everyone or all parts of the region. Race and income are still two strong predictors of life outcomes. They predict everything from if we survive our birth to when we will die, and both race and income can significantly limit the likelihood of enjoying regional prosperity.<sup>1</sup>

Since the adoption of VISION 2040 in 2008, PSRC has taken a closer look at how to evaluate plans and policies for their potential outcomes for different populations and has provided tools, information, and guidance for local jurisdictions. However, PSRC is not the first to explore issues related to social equity in the central Puget Sound region. Marginalized communities have worked for generations with jurisdictions to address these issues. Their work in this arena served as the foundation for much of what PSRC has done. This analysis has been completed as part of PSRC’s Title VI plan.

PSRC is updating VISION 2040, the region’s growth management, economic, and transportation strategy, to reflect new information, priorities, and other changes since it was adopted in 2008, including information on the region’s changing demographics.

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<sup>1</sup> Lorch, Scott and Elizabeth Enlow. (2016). The Role of Social Determinants in Explaining Racial/Ethnic Disparities in Perinatal Outcomes. <https://www.nature.com/articles/pr2015199>; Mode, Nicolle, Michelle Evans, and Alan Zonderman. (2016). *Race, Neighborhood Economic Status, Income Inequality and Mortality*. <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0154535>.

The updated plan, VISION 2050, will provide a guide for sustaining a healthy environment, thriving communities, and a strong economy through 2050.

PSRC's members and community stakeholders have identified a heightened concern for racial and social equity, elevating the different impacts that regional growth alternatives may have on people of color and people with low incomes in discussion of how the region should grow over the long term.

## **Final Supplemental Environmental Impact Statement**

The VISION 2050 Final Supplemental Environmental Impact Statement (Final SEIS) evaluates the impacts the Regional Growth Strategy alternatives might have across a variety of measures. The analysis in this appendix includes special emphasis on how the alternatives may affect people of color and people with low incomes. To evaluate and compare the alternatives, the Final SEIS considers impacts in areas with particularly high concentrations of those communities today, looking at areas with over 50 percent people of color or over 50 percent people with low incomes where possible. These areas are referred to as "equity geographies" throughout this document. This analysis includes a selection of the land use, transportation, and housing measures drawn from the Final SEIS.

This appendix consolidates these measures to more thoroughly understand the impacts on people with low incomes and people of color in the region. The analysis of alternatives for the equity geographies is based on current demographics in the region. Although the locations of people of color and people with low incomes is unknown for 2050, this analysis provides a window on how continued growth may impact current and future residents and their ability to maintain existing communities and access to jobs, transit, and other community amenities.

To support the analysis of alternatives in the Final SEIS, additional demographic information is included on populations with special needs, including special transportation needs. This includes data on race and ethnicity, age, disability, limited English proficiency, and zero vehicle households. These demographics are displayed in a series of maps in Part 5 showing geographic distribution by census tract in 2000, 2016, and the percent change between 2000 and 2016. While the demographic section looks at individual and household characteristics, people may fall into more than one of these categories. It is important to consider how these intersecting characteristics may affect the ability for people to access the region's opportunity and benefits of regional growth.

This appendix also provides information about housing affordability, including cost burden and combined housing and transportation costs. This information is important

to consider in the context of analyzing displacement risk and access to opportunity in the region.

To varying degrees, the alternatives in the Final SEIS concentrate growth in regional growth centers and near high-capacity transit. These areas generally have higher concentrations of people of color and people with low incomes. This appendix includes demographic characteristics of regional growth centers and high-capacity transit station areas to help better understand how the amount of growth in these locations may impact existing communities.

## **Definitions**

This appendix uses terms to describe specific populations related to equity. These terms are defined below.

### ***Environmental Justice***

Equal protection from environmental hazards for individuals, groups, or communities regardless of race, ethnicity, or economic status. This applies to the development, implementation, and enforcement of environmental laws, regulations, and policies, and implies that no population of people should be forced to shoulder a disproportionate share of negative environmental impacts of pollution or environmental hazard due to a lack of political or economic strength. Environmental justice also promotes equal access to the decision-making process to have a healthy environment in which to live, learn, and work.

### ***Environmental Justice Populations***

Populations included in Environmental Justice are defined by Executive Order 12898, *Federal Actions to Address Environmental Justice Populations in Minority Populations and Low-Income Populations*.<sup>2</sup> This includes minority populations, referred to in this document as people of color, or Black, Hispanic/Latinx<sup>3</sup>, Asian, American Indian, Alaskan Native, Native Hawaiian, other, Pacific Islander, or two or more races or ethnicities. Also included in this definition are low-income populations with household income at or below U.S. poverty guidelines. States and localities may, however, adopt a higher threshold for low income as long as the higher threshold is not selectively

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<sup>2</sup> Executive Order 12898 of February 11, 1994, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. Code of Federal Regulations, Title 3. Available at: <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>.

<sup>3</sup> Latinx is a gender-neutral term used in this document for a person of Latin American origin or descent.

implemented and is inclusive of all persons at or below the U.S. Department of Health and Human Services poverty guidelines. This analysis uses a threshold of 200 percent.

### ***Equity (also Social Equity)***

All people have the resources and opportunities to improve the quality of their lives and reach their full potential. Differences in life outcomes cannot be predicted by race, class, or any other identity. Those affected by poverty, communities of color, and historically marginalized communities are engaged in decision-making processes, planning, and policy making.

### ***Equity Geographies***

Areas where impacts can be differentiated between the entire regional population and social equity populations. Examples are:

1. People of color equity geographies – census tracts where over 50 percent of the residents are people of color.
2. Low-income equity geographies – census tracts where over 50 percent of the households earn less than 200 percent of the federal poverty level.

### ***People of Color***

Individuals who report as Black, Hispanic/Latinx, Asian, American Indian, Alaskan Native, Native Hawaiian, other, Pacific Islander, or two or more races or ethnicities. People of color are sometimes referred as “minority populations” in other PSRC publications or elsewhere.

### ***People with Low Incomes***

Individuals with a household income less than 200 percent of the federal poverty level. Note that this designation applies only to those people whose poverty status can be determined.

### ***Special Needs Populations***

Federal orders on environmental justice require consideration of people of color and people with low incomes. Other populations are protected by Title VI and related nondiscrimination statutes, such as the elderly, disabled, etc. These are referred to as “special needs populations” and are addressed through environmental justice and Title VI in federally sponsored transportation programs, policies, and activities. State law also identifies special needs populations, including people with disabilities, youth, seniors and seniors aging in place, limited-English proficient residents, homeless school-aged children, families who have experienced domestic violence, veterans, and limited literacy residents.

# Part 2: Existing Conditions

This section describes the existing conditions and trends of regional demographics. Additional demographic information can be found in PSRC’s Demographic Profile, available at: <https://www.psrc.org/sites/default/files/demographicprofile.pdf>.

## Regional Demographics

Between 2000 and 2016, the region’s population grew by more than 650,000 people. This growth led to changing demographics in the region, which are highlighted below. Additional maps showing these demographics can be found in Part 5.

### People of Color

People of color make up about one-third of the region’s current population and increased by 543,000 residents, or 70 percent, from 2000 to 2016. This increase in population is over twice the size of the existing population in Kitsap County. The White population in the region has grown at a much slower rate of just 4 percent (Table 1). People of color represent 83 percent of the region’s population growth since 2000.

Table 1. People of Color, 2000-2016

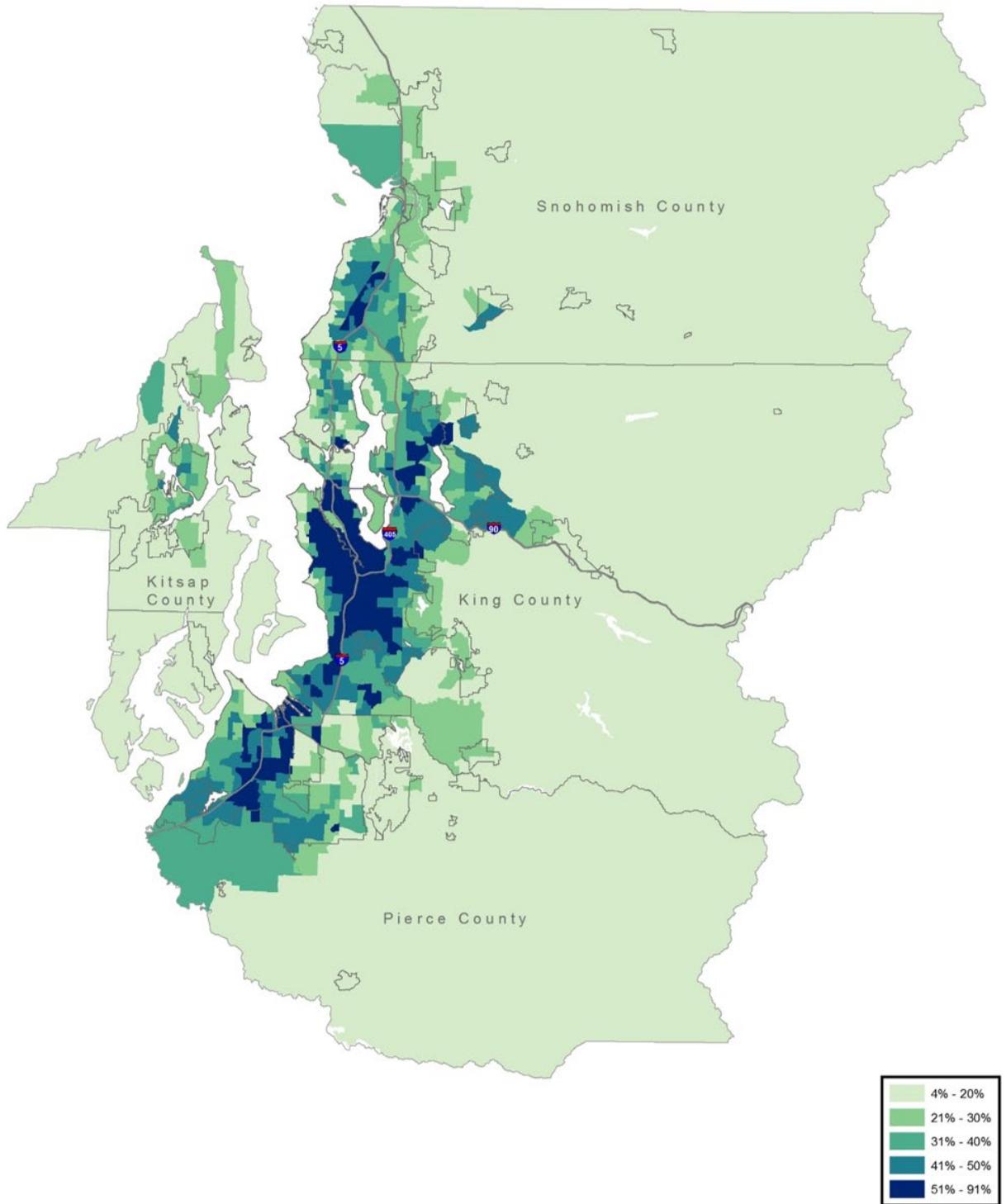
	2000		2016		2000-2016 Change	
	#	%	#	%	#	% change
People of Color <sup>4</sup>	774,000	24%	1,316,900	34%	542,800	70%
White (Alone)	2,501,800	76%	2,611,700	66%	109,900	4%
Total	3,275,800	100%	3,928,600	100%	652,700	20%

Source: 2000 US Decennial Census, 2012-16 ACS 5-Year Estimates

Figure 1 shows the share of people of color by census tract in the region. People of color are concentrated in the denser areas of the region, particularly along the Interstate 5, Interstate 405, SR 99 and SR 520 corridors and in southwest King County and northwest Pierce County.

<sup>4</sup> Per the US Census Bureau, racial categories included in the census questionnaire generally reflect a social definition of race recognized in this country and not an attempt to define race biologically, anthropologically, or genetically. People may choose to report more than one race to indicate their racial mixture, such as “American Indian” and “White.” People who identify their origin as Hispanic, Latinx, or Spanish may be of any race. For more information, please see the US Census Bureau website.

Figure 1. People of Color, Central Puget Sound: 2016



Source: American Community Survey 5-year estimates

## ***People with Low Incomes***

The number of residents with low incomes increased by about 40 percent in the region between 2000 to 2016 (as seen in Table 2). Residents are considered to have low incomes if their total family income is below 200 percent of the Federal Poverty Level.<sup>5</sup> About 24 percent of residents have income below this threshold in the region.

**Table 2. People with Low Incomes**

	2000		2016		2000-2016	
	#	%	#	%	#	% change
Low-Income Population	674,600	21%	942,400	24%	267,800	40%
Non-Low-Income Population	2,533,500	79%	2,922,500	76%	389,000	15%
Total	3,208,200	100%	3,865,000	100%	656,800	20%

Source: 2000 US Decennial Census, 2012-16 ACS 5-Year Estimates

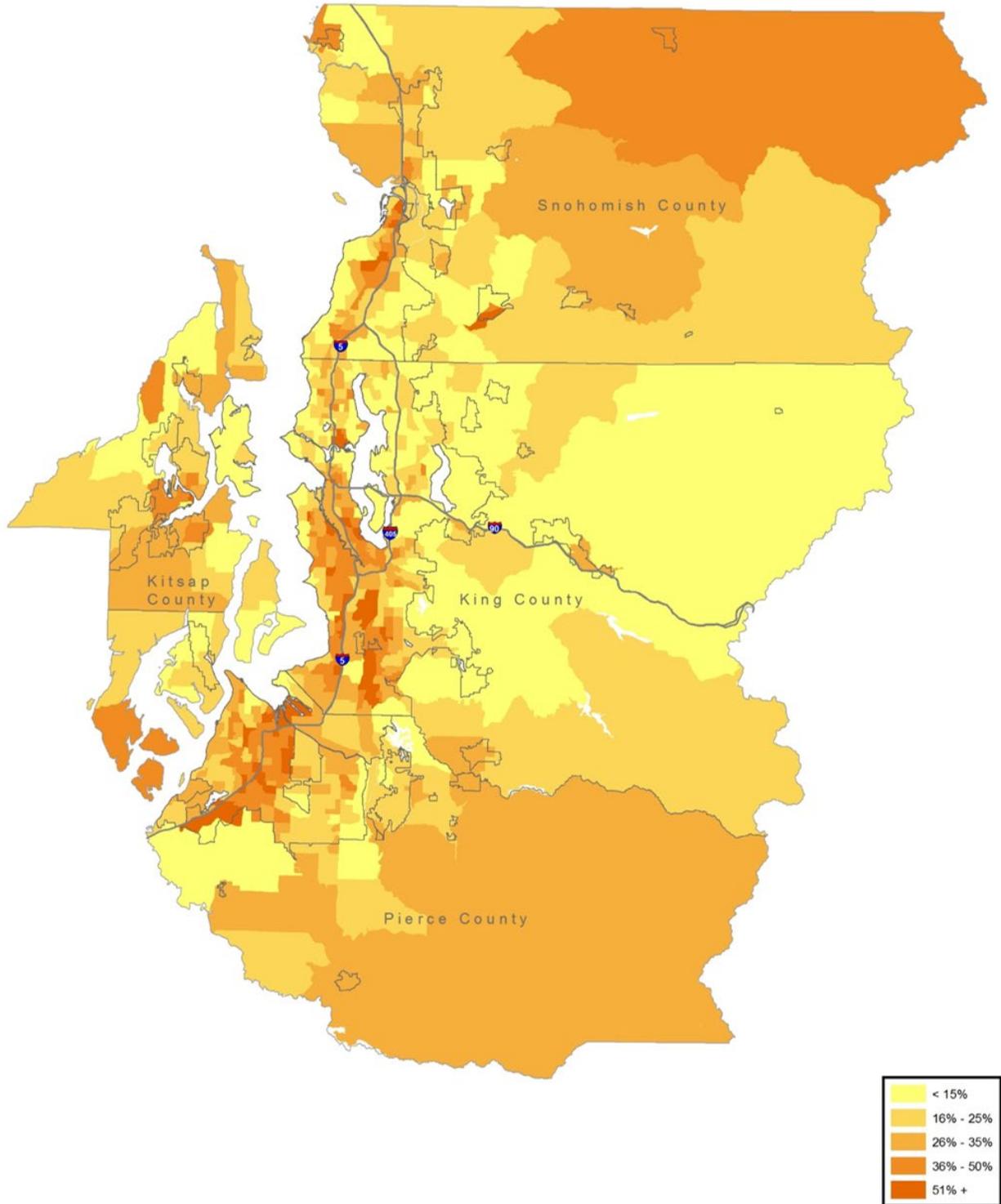
Note: Total for whom poverty status is determined.

Figure 2 shows the share of residents with low incomes for each census tract. Many of the concentrations of people with low incomes are located similarly to those where concentrations of people of color reside, concentrated in areas along the Interstate 5 corridor in Snohomish County and in central and south Seattle, southwest King County, Bremerton, and northwest Pierce County.

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<sup>5</sup> The poverty threshold for a family of four is \$24,036. See “Computations for the 2016 HHS Poverty Guidelines” at <https://aspe.hhs.gov/computations-2016-poverty-guidelines>.

Figure 2. People with Low Incomes, Central Puget Sound: 2016



Source: American Community Survey 5-year estimates

### **Limited English Proficiency**

The region has also seen growth in the number of people that report speaking English less than “very well.” This group has grown by about 51 percent between 2000 and 2016 and accounts for 8 percent of the total population of the region (Table 3).

**Table 3. Limited English Proficiency (LEP)**

	2000		2016		2000-2016	
	#	%	#	%	#	% change
People with LEP	203,800	7%	307,200	8%	103,400	51%
Non-LEP	2,859,400	93%	3,374,300	92%	514,900	18%
Total	3,063,200	100%	3,681,600	100%	618,400	20%

Source: 2000 U.S. Decennial Census, 2012-16 ACS 5-Year Estimates

Note: Total is for Population 5 years and over.

### **Age Groups**

Since 2000, the region has seen an increase in the number of people 65 years old or older. This group grew at a rate of 47 percent between 2000 and 2016 and makes up about 12 percent of the region’s population (Table 4). Conversely, the rate of growth for people under the age of 18 is lower at 7 percent, well below the regional population growth rate of 20 percent (Table 4).

**Table 4. Age Groups**

	2000		2016		2000-2016	
	#	%	#	%	#	% change
Under 18	806,900	25%	864,600	22%	57,800	7%
18-64	2,136,000	65%	2,573,000	65%	437,000	20%
Age 65+	333,000	10%	491,000	12%	158,000	47%
Total	3,275,900	100%	3,928,600	100%	653,000	20%

Source: 2000 U.S. Decennial Census, 2012-16 ACS 5-Year Estimates

## ***Persons with Disabilities***

Persons with disabilities ages 18 or older make up about 14 percent of the total population of the region (Table 5).<sup>6</sup>

**Table 5. Persons with a Disability Ages 18 and Older**

	2016	
	#	%
People with a Disability	404,200	14%
Remainder of Population	2,586,700	86%
Total	2,990,900	100%

Source: 2012-16 ACS 5-Year Estimates

Note: Total is for Non-institutionalized civilians over 18.

## ***Zero Vehicle Households***

The percentage of households that have a vehicle has stayed constant between 2000 and 2016. About 92 percent of households in the region have a vehicle, while 8 percent do not (Table 6).

**Table 6. Households without a Vehicle**

	2000		2016		2000-2016	
	#	%	#	%	#	% change
Households without a vehicle	101,400	8%	119,400	8%	18,000	18%
Households with a vehicle	1,181,600	92%	1,396,600	92%	215,000	18%
Total	1,283,000	100%	1,516,000	100%	233,000	18%

Source: 2000 US Decennial Census, 2012-16 ACS 5-Year Estimates

## ***Demographic Trend Analysis***

The central Puget Sound region is becoming more diverse, with people of color making up an increasing share of the population. Although the region is often characterized by economic growth, the number of people with incomes below 200 percent of the Federal Poverty Line has increased since 2000. It appears that more and more people are being excluded from enjoying the prosperity of the region. Finally, the proportion of the

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<sup>6</sup> The 2000 Census documented the population of people with disabilities ages 16 and older. Since the Decennial Census and American Communities Survey questions differ, there is no comparable data set to measure change from 2000 to 2016.

region's population that is 65 or older is growing. The region's changing demographic groups may have different needs to be able to fully benefit from the anticipated growth between now and 2050. As the region becomes more diverse, addressing the unique needs of these demographics becomes increasingly critical not only for these individuals but for regional health and resilience. Research has found that reducing inequities can improve both individual and regional prosperity.<sup>7</sup>

## **Housing Affordability and Transportation**

Many factors contribute to how affordable it is to live in this region. As the largest expense for most households, housing is an important data point to understand. Further understanding of job accessibility and transportation costs is also important, as these are major contributors to household income and spending.

More information on housing affordability in the region can be found in the 2018 VISION 2050 Housing Background Paper<sup>8</sup> on the [PSRC website](#).

### ***Cost Burden***

A household is considered cost-burdened if it pays more than 30 percent of its income on housing. This includes rent or mortgage payments and utilities. A household is considered severely cost-burdened if it pays more than 50 percent of income on housing. Cost burden is a relative metric; a high-income, cost-burdened homeowner is most likely in a different financial position than a low-income cost-burdened renter. Lower-income individuals have less disposable income to manage changing housing costs and other household expenses. They are regularly forced to make impossible decisions: Fill the gas tank or the refrigerator? Keep the lights on or the heat?

Across the region, about 30 percent of homeowners and 45 percent of renters are cost-burdened or severely cost-burdened.<sup>9</sup> Generally, renters across the region experience higher levels of cost burden than homeowners.

Cost burden varies by the race/ethnicity of households, as highlighted in Figures 3 and 4.

For renter households, over half of Black and almost half of Hispanic/Latinx renters were either cost-burdened or severely cost-burdened in 2014. Those proportions

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<sup>7</sup> Ostry, Jonathan, Andrew Berg, and Charalambos Tsangarides. (2014). *Redistribution, Inequality, and Growth*. Available at [https://relooney.com/NS4053/00\\_NS4053\\_140.pdf](https://relooney.com/NS4053/00_NS4053_140.pdf).

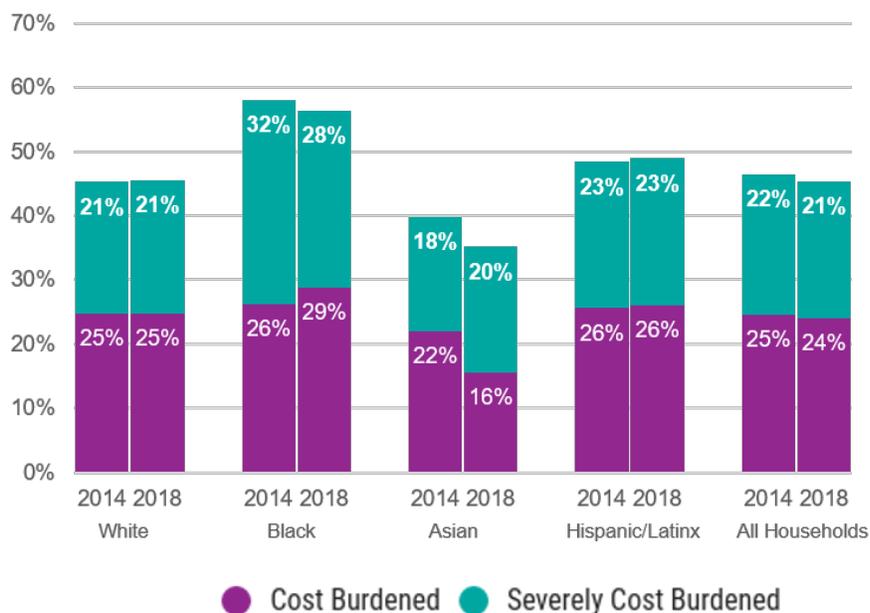
<sup>8</sup> PSRC. 2018g. VISION 2050 Housing Background Paper. Puget Sound Regional Council. Seattle, WA. June 2018.

<sup>9</sup> CHAS (Comprehensive Housing Affordability Strategy) data.

remained relatively the same in 2018. Asian renter households continued to be the least likely to experience any level of cost burden in the region (Figure 3).

Cost burden varies by the race/ethnicity of households, as highlighted in Figure 3. Over half of Black and Hispanic/Latinx renters were either cost-burdened or severely cost-burdened in 2014. Those proportions remained relatively the same for Black renters and were slightly reduced for Hispanic/Latinx renters in 2018 (Figure 3). Asian residents continued to be the least likely to experience any level of cost burden in the region.

Figure 3. Cost-Burdened Renters by Race/Ethnicity, 2014 and 2018

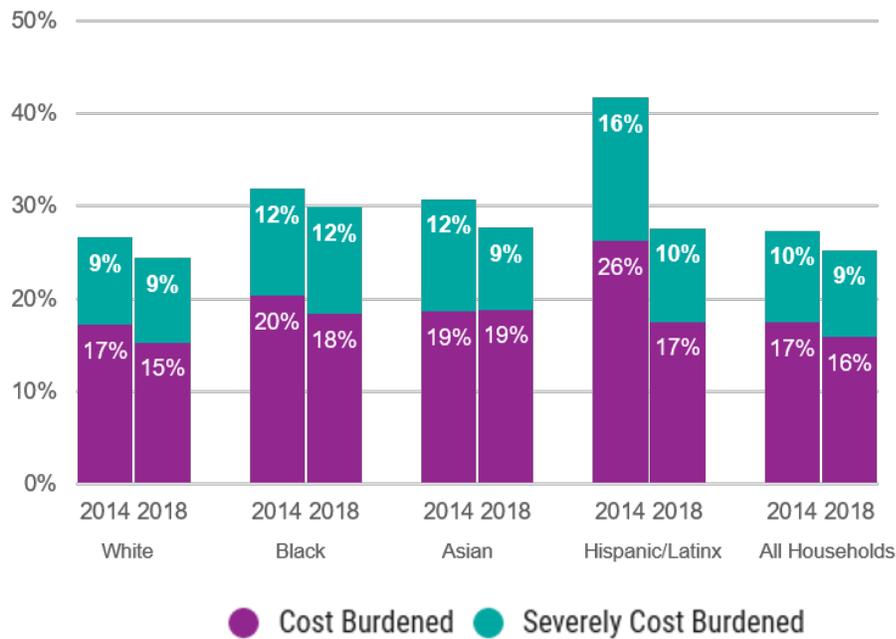


Source: U.S. Census, PUMS

The racial/ethnic narrative is slightly different for homeowners. Between 2014 and 2018, each racial/ethnic group experienced a decline in the share of households that were either cost-burdened or severely cost-burdened, although some groups' declines were greater than others. In 2014, Black (32 percent) and Asian (31 percent) households were more likely to experience some level of cost burden than their White (27 percent) counterparts. However, Hispanic/Latinx (42 percent) households were the most likely to have this experience. By 2018, Hispanic/Latinx households saw a 14 percent decline and experienced rates that were similar to those of Black and Asian households. However, White households continued to be the least likely to experience some level of cost burden (Figure 4).

Although the share of cost-burdened households has decreased for all renter and owner households between 2014 and 2018, the number of households has increased.

Figure 4. Cost-Burdened Owners by Race/Ethnicity, 2014 and 2018

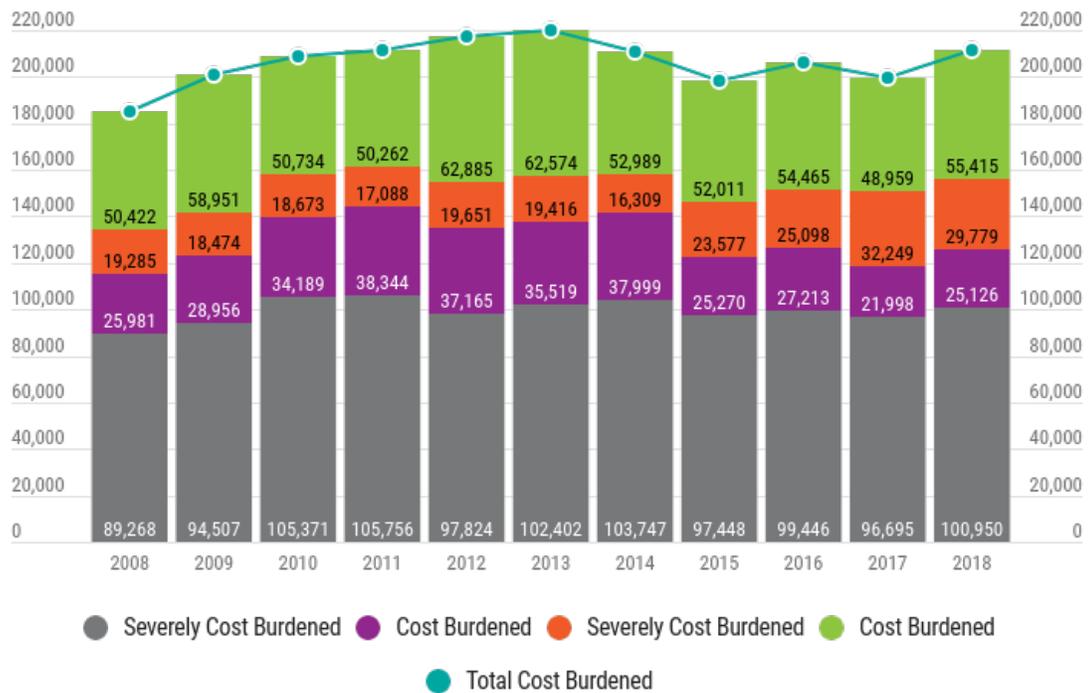


Source: U.S. Census, PUMS

The number of cost-burdened households making less than 50 percent of the area median income increased by about 35,000 households from 2008 to 2013, fluctuating between about 198,000 and 211,000 households since 2014 (Figure 5). However, this group’s proportion of the region has gradually declined since 2013, moving to about a third of the region’s renter households (Figure 6). Cost-burdened households are often the most at risk to lose their housing and experience homelessness. National research shows a connection between rent increases and homelessness; a \$100 increase in rent is associated with an increase in homelessness of between 6 and 32 percent.<sup>10</sup>

<sup>10</sup> Housing Development Consortium. 2018. <https://www.housingconsortium.org/>.

Figure 5. Low-Income Cost-Burdened Renters, 2008-2018



Source: U.S. Census, PUMS

Figure 6. Low-Income Cost-Burdened Renters as a Share of all Renters, 2008-2018



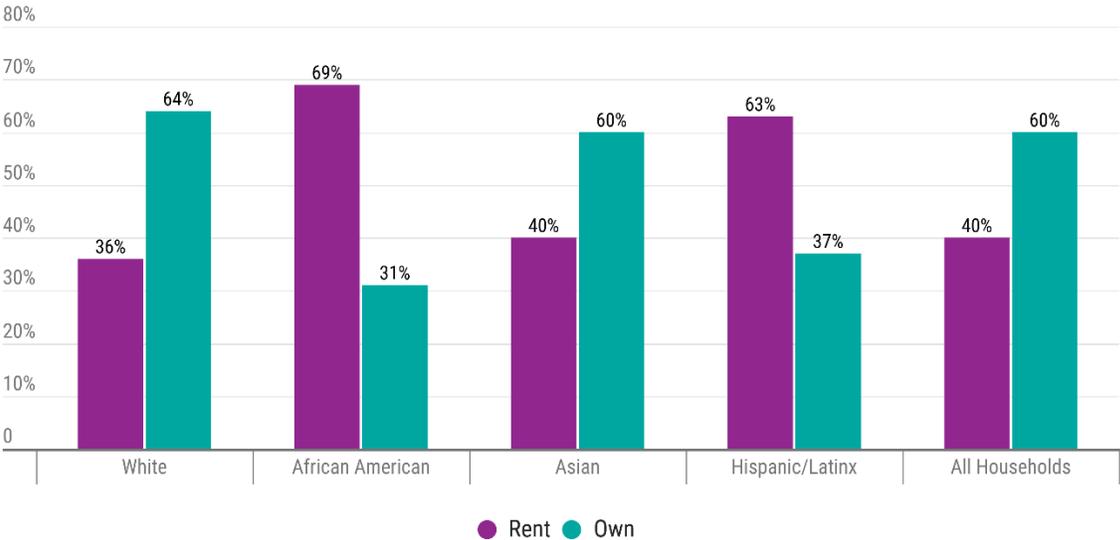
Source: U.S. Census, PUMS

**Housing Tenure**

The majority of households in the region, 60 percent, own their homes.<sup>11</sup> However, the percentage of homeowners dropped during the recession of 2007-2009 and has marginally improved since. One factor driving this trend is the relatively low supply of homes for sale. Other demand factors, such as the influx of job-seeking renters and Millennials waiting longer to buy homes than previous generations, are likely in play as well.

There are variations in housing tenure when analyzed by the race/ethnicity of the households. The majority of Black and Hispanic/Latinx households are renters, while the majority of White and Asian households are homeowners, as shown in Figure 7. In fact, the Black homeownership rate is half the size of the White homeownership rate, which can lead to an increased susceptibility to displacement and less ability to develop intergenerational wealth. These racial variations in homeownership cannot be attributed to a single factor. Past overtly discriminatory government policies, such as redlining; modern practices, such as mortgage loan discrimination; and existing neutral policies that do not recognize the uneven playing field are some of the factors contributing to these present inequities. These factors and others require many solutions, some of which may begin to be addressed through VISION 2050 or continued work by PSRC and local jurisdictions.

Figure 7. Housing Tenure by Race/Ethnicity



Source: ACS

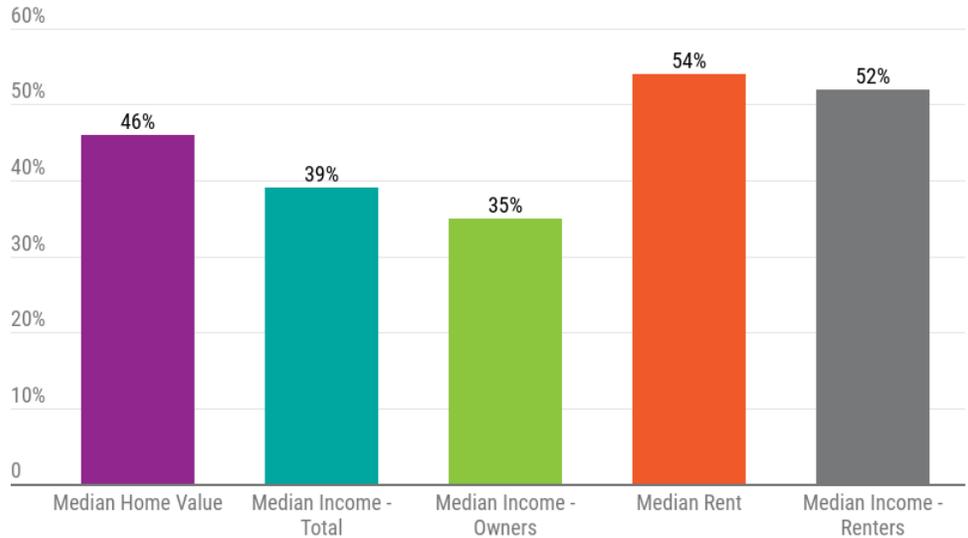
<sup>11</sup> PSRC. 2018. VISION 2050 Housing Background Paper. Puget Sound Regional Council. Seattle, WA. June 2018.

**Housing Costs**

Affordable housing<sup>12</sup> is commonly defined as housing costs not exceeding 30 percent of household income. Paying more than 30 percent of income on housing costs reduces a household’s budget available for other basic necessities.

With a surge in demand for housing that has outpaced the increase in housing supply, the region is experiencing an affordability crisis.<sup>13</sup> Many middle- and lower-income households struggle to find housing that fits their income in an increasingly competitive and expensive housing market. Since 2010, while the median home value has increased by about 46 percent, the median income has only increased by 39 percent (Figure 8). As families struggle to find homes that fit their budget, households are forced to move farther from their jobs and communities, resulting in increased traffic congestion and fragmentation of communities. Average commute times have increased by over 15 percent since 2010.

Figure 8. Percent Change in Home Value, Rent, and Income, 2010-2018



Source: U.S. Census

<sup>12</sup> This appendix refers to “affordable housing” as any housing that meets the threshold of not exceeding 30% of a household’s income. Housing that is deemed affordable because of subsidies or income/rent restrictions is expressly noted.

<sup>13</sup> City of Seattle. (2015) Housing Affordability and Livability Agenda. Available at: [http://murray.seattle.gov/wp-content/uploads/2015/07/HALA\\_Report\\_2015.pdf](http://murray.seattle.gov/wp-content/uploads/2015/07/HALA_Report_2015.pdf).

## ***Housing and Transportation Costs***

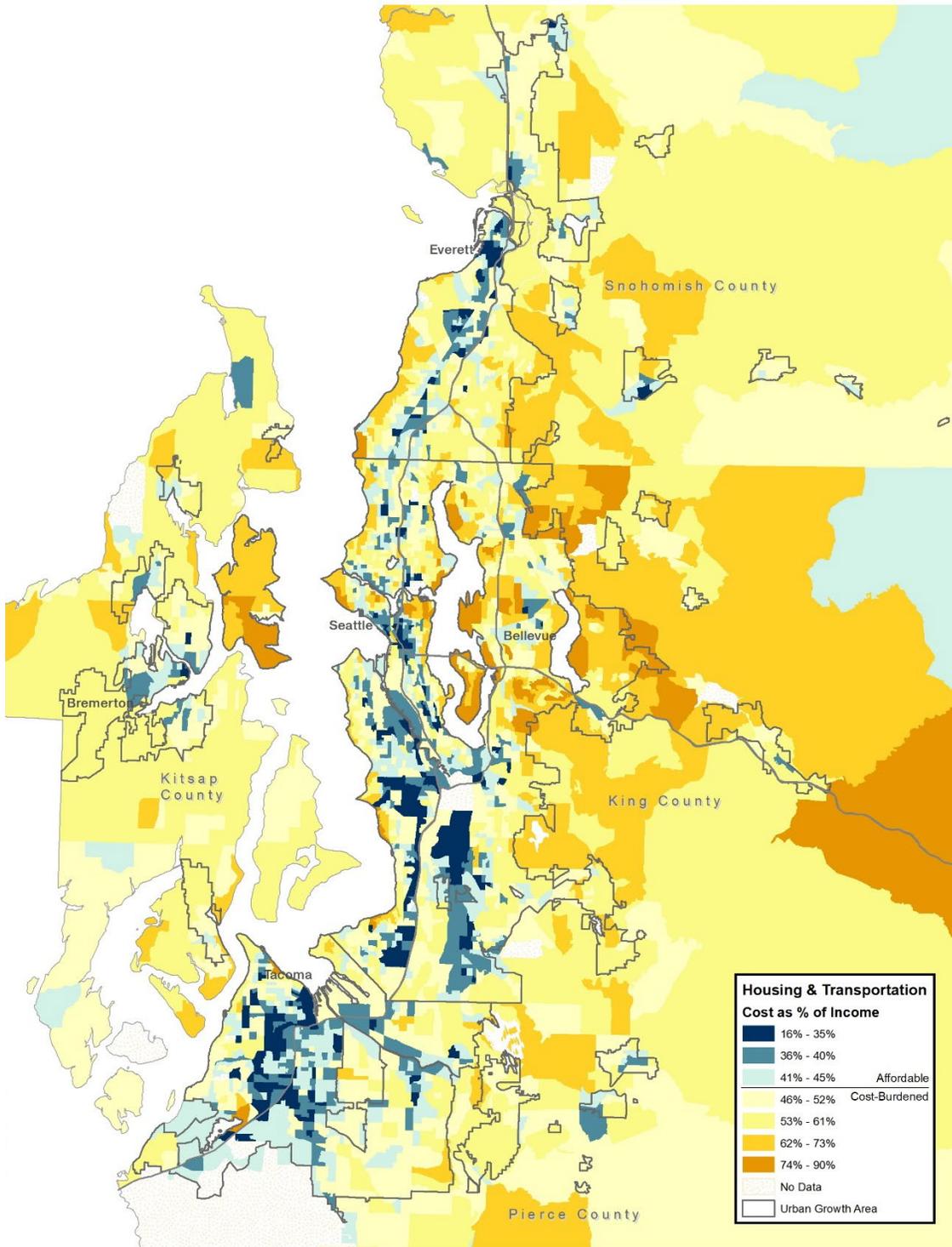
Since 1984, the Bureau of Labor Statistics has reported that transportation costs are the second largest expense for households after housing.<sup>14</sup> A more complete understanding of household cost burden looks at housing and transportation costs together (H+T). A household is considered cost-burdened if its combined housing and transportation costs exceed 45 percent of income. Factoring in the recommended 30 percent of income spent on housing, the formula allows for 15 percent of a household's income to be spent on transportation costs. Figure 9 shows estimated housing plus transportation affordability for a household earning the area median income. Some areas along the I-5 corridor are least likely to experience this type of cost burden. Although the cost of housing is often relatively more expensive in these communities, the median incomes in some of these areas are relatively higher and access to transit and other travel options can greatly reduce transportation costs for a household. However, there are also pockets of poverty along the I-5 corridor where households spend a considerable share of their income on housing and transportation. This experience is illustrated by the census tracts highlighted in yellow next to I-5. Conversely, several communities in the western portion of Pierce County have low H+T costs relative to their income, which is likely the result of the relatively affordable homes in this area.



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<sup>14</sup> Bernstein, Scott, Carrie Makarewicz, and Kevin McCarty. (2005) *Driven to Spend*. Available at: [http://www.busadvocates.org/articles/householdcosts/Driven\\_to\\_Spend\\_Report.pdf](http://www.busadvocates.org/articles/householdcosts/Driven_to_Spend_Report.pdf).

Figure 9. Housing and Transportation Costs as Percentage of Income



Source: Center for Neighborhood Technology

**Housing Need**

PSRC’s forecast anticipates the region will add about 1.8 million more people by 2050. That growth will result in about 830,000 new households. While most current residents have been able to rent or purchase a home, many are living in homes that are beyond their financial means or do not meet needs, such as those that are too small for their family size or lack accommodation for aging residents. A significant challenge facing the region is producing enough new housing units as the population grows and providing more affordable housing that matches the needs of current residents.

Future household incomes cannot be accurately predicted but, for this analysis, are assumed to be similar to the current distribution. Today, 31 percent of the region’s households pay at least 30 percent of their income towards housing, and 60 percent of these cost-burdened households have moderate to low income. In the future, demand by households with lower income is assumed to be similar to today, with 27 percent of households being very low income and 45 percent low income.<sup>15</sup>

Applying these shares to the future needs of 830,000 additional households in the region means that the region needs to house more than 370,000 households at 80 percent or less of area median income (AMI) by 2050 (Figure 10).

Figure 10. Anticipated Households Growth by Income Group



Source: ACS, PUMS

<sup>15</sup> 2016 ACS 1-YEAR PUMS.

Assuming a constant rate of growth of 1.22 percent, housing these new residents would require the region to produce about 20,500 housing units in 2018, growing annually up to 30,300 units in 2050. In 2017, approximately 23,300 housing units were produced, exceeding the annual need. However, this current increase in production follows a long, slow economic recovery when housing production did not keep up with demand. To serve different household incomes, the region should be producing about 9,225 units a year that are accessible to those earning 80 percent or less of the area median income. Of that amount, more than 5,500 new housing units are needed each year for very low-income households earning less than 50 percent of the area median income.

### ***Jobs Accessible by Mode***

Communities with higher concentrations of people with low incomes and people of color generally have access to more jobs within 45 minutes of transit, a 1-mile walk, or a 3-mile bike trip than the rest of the population. This is consistent with data that show these residents are more concentrated in centers and high-capacity transit station areas in King, Snohomish, and Pierce counties.

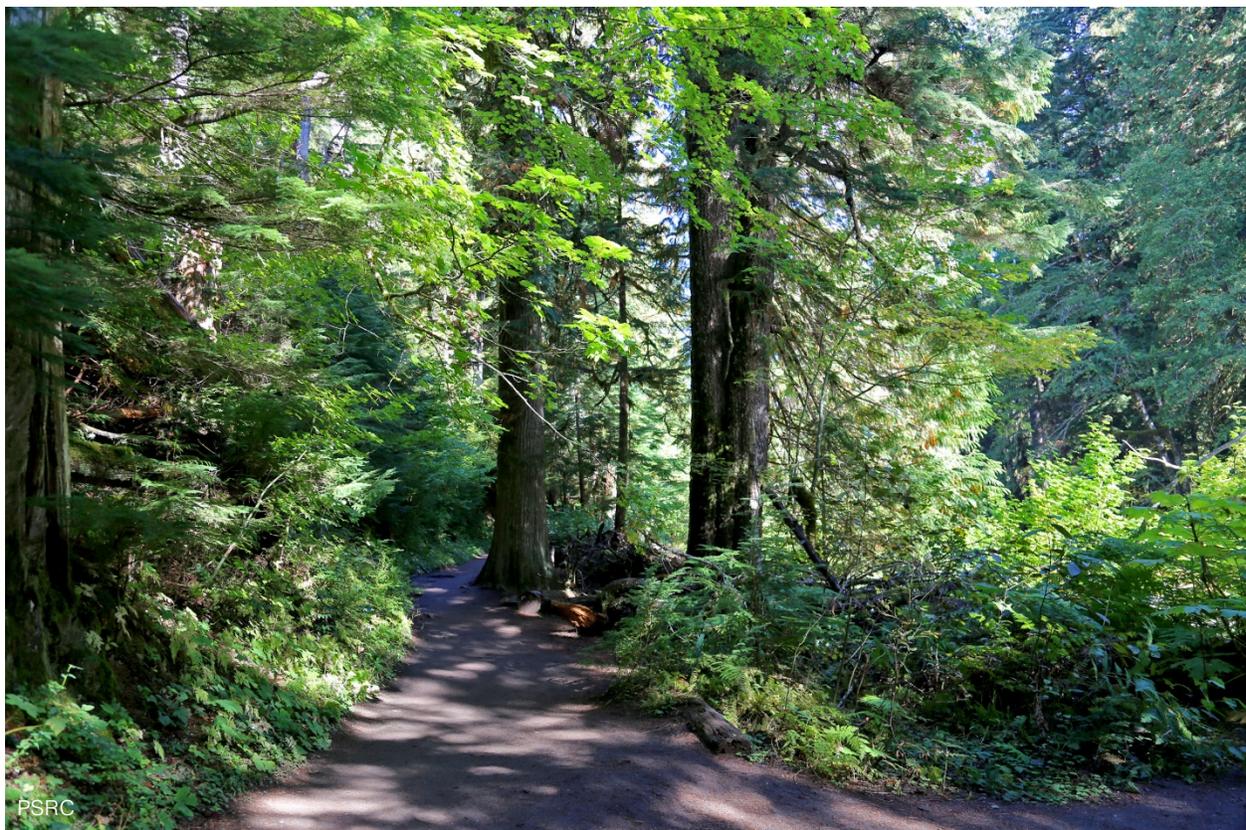
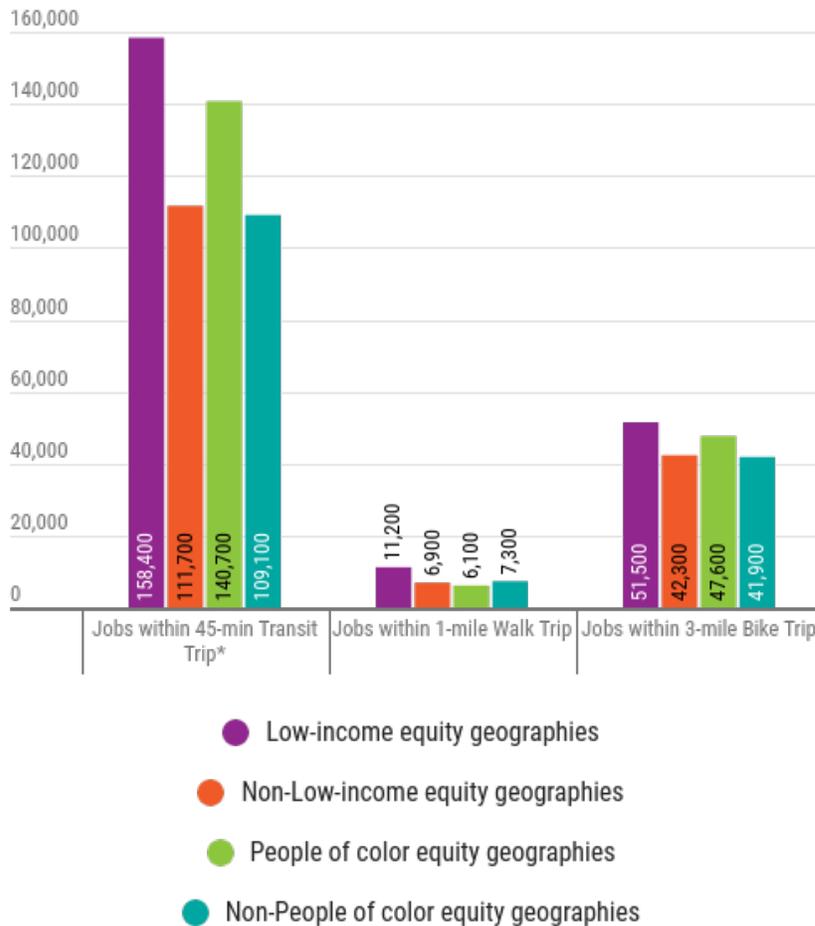


Figure 11. Jobs Accessible by Mode, 2017



Source: PSRC

Note: Values represent the average number of jobs accessible per capita (resident) by home location. \*A 45-minute transit trip includes walk, wait, and in-transit time.

Additional existing conditions related to transportation accessibility can be found in the Alternatives Analysis section of this document.

## Centers and Station Areas

Centers and station areas are places surrounding regional growth centers and high-capacity transit stations (Figure 12). Concentrating growth in these areas is a key strategy to achieve VISION’s 2050 goals for regional mobility, economic prosperity, and environmental sustainability. Providing a variety of housing choices, employment types, and access to opportunity for all residents in centers and transit station areas is critical to achieving equitable outcomes in VISION. This highly concentrated planning around transit and in regional growth centers can present significant opportunities and challenges. Increasing residential and employment capacity in these areas could allow more people access to their many economic, environmental, and social benefits.

However, for existing communities, increased growth without appropriate mitigation could lead to displacement.

To better understand who is currently living in these areas, the demographics described in this section compare population shares and demographics to the rest of the region. This analysis includes two types of places: regional growth centers and areas around high-capacity transit stations. They have the following characteristics:

**Regional growth centers.** The 29 regional growth centers designated by PSRC are focal points for new growth and are identified to receive a sizable portion of the region's population and employment growth. Regional growth centers are expected to achieve densities sufficient to support high-capacity transit through long-term growth and development.

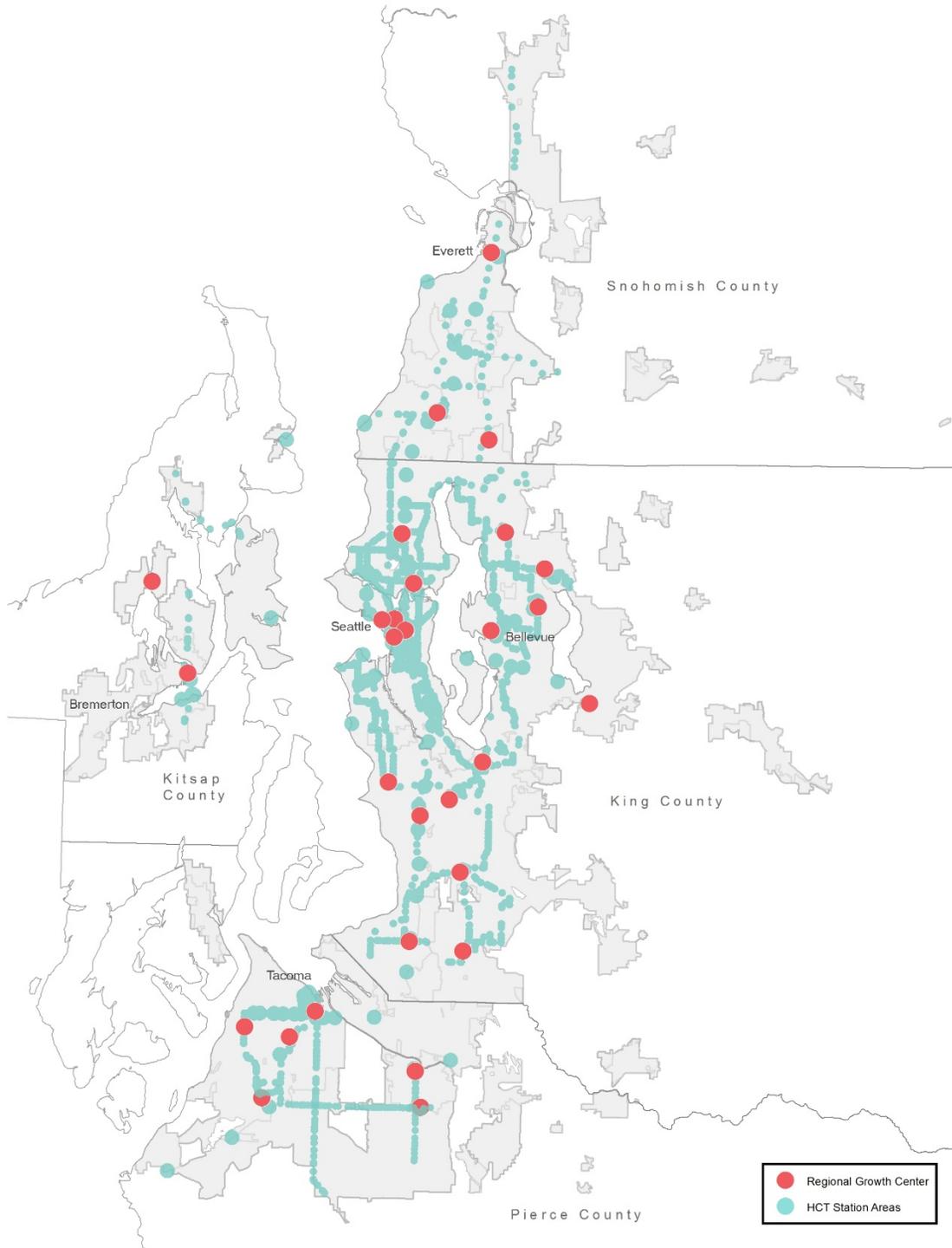
**High-capacity transit station areas.** These include areas ½ mile around light rail stations, commuter rail stations, streetcar stops, and ferry terminals and ¼ mile around bus rapid transit stations.

These areas (regional growth centers and high-capacity transit) represent less than 2 percent of the land area in the region and 12 percent of the land area in the Urban Growth Area.

This analysis focuses on transit-oriented places. Although manufacturing/industrial centers are important job locations for the region, they are not included in this analysis. Manufacturing/industrial centers are often difficult to serve by transit and are not intended for residential or non-industrial commercial activity.

As the region continues to invest in its high-capacity transit system, knowing more about communities in station areas will help us better understand the needs of their current and future residents, as well as begin the process of mitigation to avoid displacement.

Figure 12. Regional Growth Centers and High-Capacity Transit Station Areas



Source: PSRC

**Population**

Table 7. Population – Regional Growth Centers & High-Capacity Transit

	Centers & High-Capacity Transit		Non-Centers & High-Capacity Transit		Region
	#	%	#	%	
Total Population	751,300	19%	3,177,300	81%	3,928,600

Source: 2012-16 ACS 5-Year Estimates

The share of population residing in the region’s centers and HCT station areas is 19 percent, while 81 percent currently live outside these areas.

**Demographics**

Table 8. People of Color and People with Low Incomes – Regional Growth Centers & High-Capacity Transit

	Centers & High-Capacity Transit	Non-Centers & High-Capacity Transit	Region
People of Color	42%	31%	34%
People with Low Incomes	32%	23%	24%

Source: 2012-16 ACS 5-Year Estimates

Overall, people living in proximity to high-capacity transit are more diverse and have lower incomes than the region’s population as a whole. Forty-two percent of people living in regional growth centers and high-capacity transit station areas are people of color, compared to 34 percent of the total regional population. Similarly, a higher concentration of people who are low income live in these areas (32 percent) compared to the rest of the region (24 percent).

Low- and moderate-income households are often at potential risk of displacement in transit communities where increased market strength and gentrification may accompany transit system development.

While transit stations provide greater connectivity throughout the region and to areas of opportunity, not everyone who lives in these areas may be able to access this infrastructure. Limitations, such as access via safe walking and biking routes or local transit infrastructure, fare payments, and education on transit service and use are considerations for understanding who can access the regional transit network.

**Table 9. Additional Demographics – Regional Growth Centers & High-Capacity Transit**

	<b>Centers &amp; High-Capacity Transit</b>	<b>Non-Centers &amp; High-Capacity Transit</b>	<b>Region</b>
Limited English Proficiency	12%	8%	8%
65+	11%	13%	12%
Under 18	17%	23%	22%
Persons with a disability	13%	14%	14%
Households with no vehicle	18%	5%	8%

Source: 2012-16 ACS 5-Year Estimates

Regional growth centers and high-capacity transit station areas have higher concentrations of households with zero vehicles than the rest of the region. There are also more people with limited English proficiency. Consideration of the needs of these communities in accessing transit infrastructure is important for ensuring that the region’s most vulnerable residents can benefit from these neighborhoods and infrastructure.

These areas have fewer youth under the age of 18, elderly and people with disabilities. Many people in these populations may benefit from living in the region’s centers and transit station areas.

***Rent in Centers vs City***

Apartment rents within regional growth centers, overall, are higher than the regional average. However, there is great variability in rents among centers. Centers in Seattle, Bellevue, and Redmond, all of which have seen significant new multifamily development,<sup>16</sup> have the highest average rents, pushing above \$2,000 in some locations. At the lower end are centers which contain some of the region’s most affordable market rate housing, typically in older buildings.

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<sup>16</sup> PSRC Residential Permits Database, 2016.

Table 10. Average Rent in Regional Growth Centers, 2017

	Average Rent	Difference - Center and City Avg. Rent
<b>Total Units in Centers</b>	\$1,871	17%
Bothell Canyon Park	\$1,736	-1%
Redmond-Overlake	\$2,220	10%
Silverdale	\$1,565	15%
Bellevue	\$2,260	12%
Redmond Downtown	\$2,078	3%
Sea-South Lake Union	\$2,234	17%
Kent	\$1,627	16%
Sea-Downtown	\$2,261	18%
Renton	\$1,613	4%
Kirkland Totem Lake	\$1,712	-12%
Sea-Uptown	\$1,834	-1%
Sea-First Hill/Cap Hill	\$1,790	-4%
Bremerton	\$1,484	23%
Sea-Northgate	\$1,539	-21%
Sea-University	\$1,677	-11%
Tacoma Downtown	\$1,319	5%
Puyallup South Hill	\$1,388	8%
Tacoma Mall	\$1,268	1%
Everett	\$1,285	-3%
University Place	\$1,141	1%
Auburn	\$1,423	12%
Lakewood	\$1,046	-1%
SeaTac	\$1,212	-11%
Burien	\$1,058	-17%
Lynnwood	\$1,370	-1%
Puyallup Downtown	\$1,042	-23%

Source: Dupre + Scott

The alternatives presented in the Final SEIS include varying levels of growth to regional growth centers and transit station areas, with the Transit Focused Growth Alternative concentrating 75 percent of future regional population and employment growth in these areas. Analysis of demographics can help identify existing conditions, potential for displacement, and strategies to address high allocations of growth in these communities.

## Health Equity

VISION 2050 emphasizes the importance of health equity. The Washington State Department of Health has developed a “Health Disparities Map,” which is an interactive mapping tool that compares communities across the state for environmental health disparities. The map shows pollution measures such as diesel emissions and ozone, proximity to hazardous waste sites, and social vulnerability to hazards. In addition, it displays information regarding poverty and cardiovascular disease. The interactive mapping tool can be found at: <https://fortress.wa.gov/doh/wtn/WTNIBL/>.

In general, environmental health disparities are high throughout much of the region. These disparities are present in communities of color and low-income communities.

## Equity Geographies

“Equity geographies” are areas with higher percentages of people of color and/or people with low incomes. In this document, areas are referred to as “equity geographies” under the following conditions:

1. People of color equity geographies – Census tracts that are greater than 50 percent people of color.
2. Low-income equity geographies – Census tracts where over 50 percent of the households are low income.

The equity geographies were determined using data from the 2012-2016 American Community Survey 5-year estimates series. The thresholds were set based on a similar equity analysis<sup>17</sup> performed by the Metropolitan Transportation Commission in the San Francisco Bay area and qualitative judgements to select a reasonably descriptive and unique set of geographies.

The locations of the equity geographies are illustrated in Figures 13 and 14. Social equity considerations are provided for several topics where impacts can be differentiated between the entire regional population and the equity geographies. These impacts are discussed in detail in Part 3 of this document.

As stated previously, there are some limitations in this analysis that are important to understand. PSRC does not forecast future distribution of race and income, so the

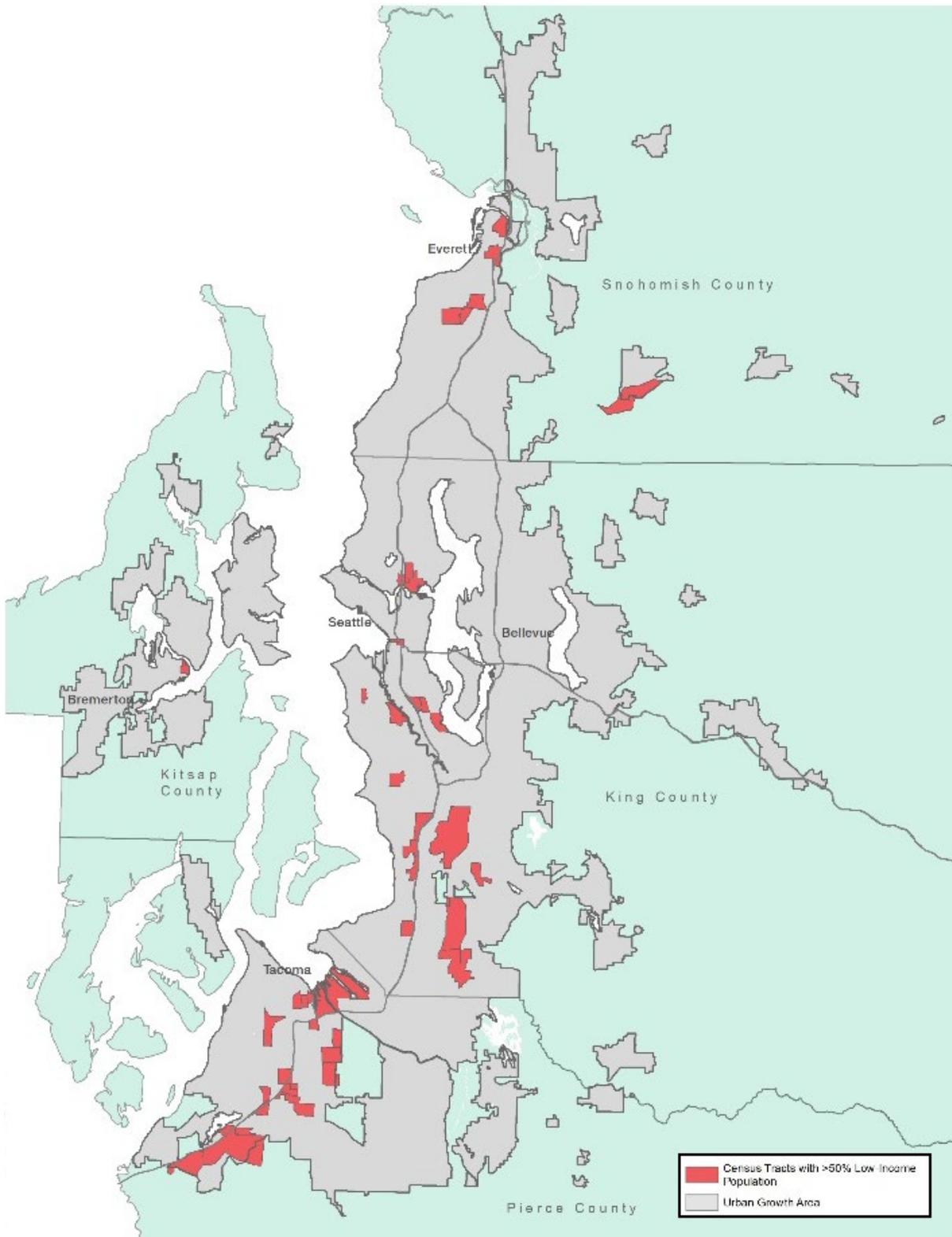
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<sup>17</sup> Metropolitan Transportation Commission. 2017. Plan Bay Area Equity Analysis. Available at: <https://www.planbayarea.org/2040-plan/plan-details/equity-analysis>.

equity geographies identify a geographic area based on current demographics in the region. Because of the use of census data, the analysis includes residents in census tracts who may be neither low income nor a person of color and does not include low-income residents or people of color located elsewhere in the region. While there are limitations to this approach, there is also significant interest in better understanding the potential equity implications of the alternatives. The equity geographies allow additional understanding of how the alternatives may affect existing communities in the region and provide a method to measure change over time in the region.

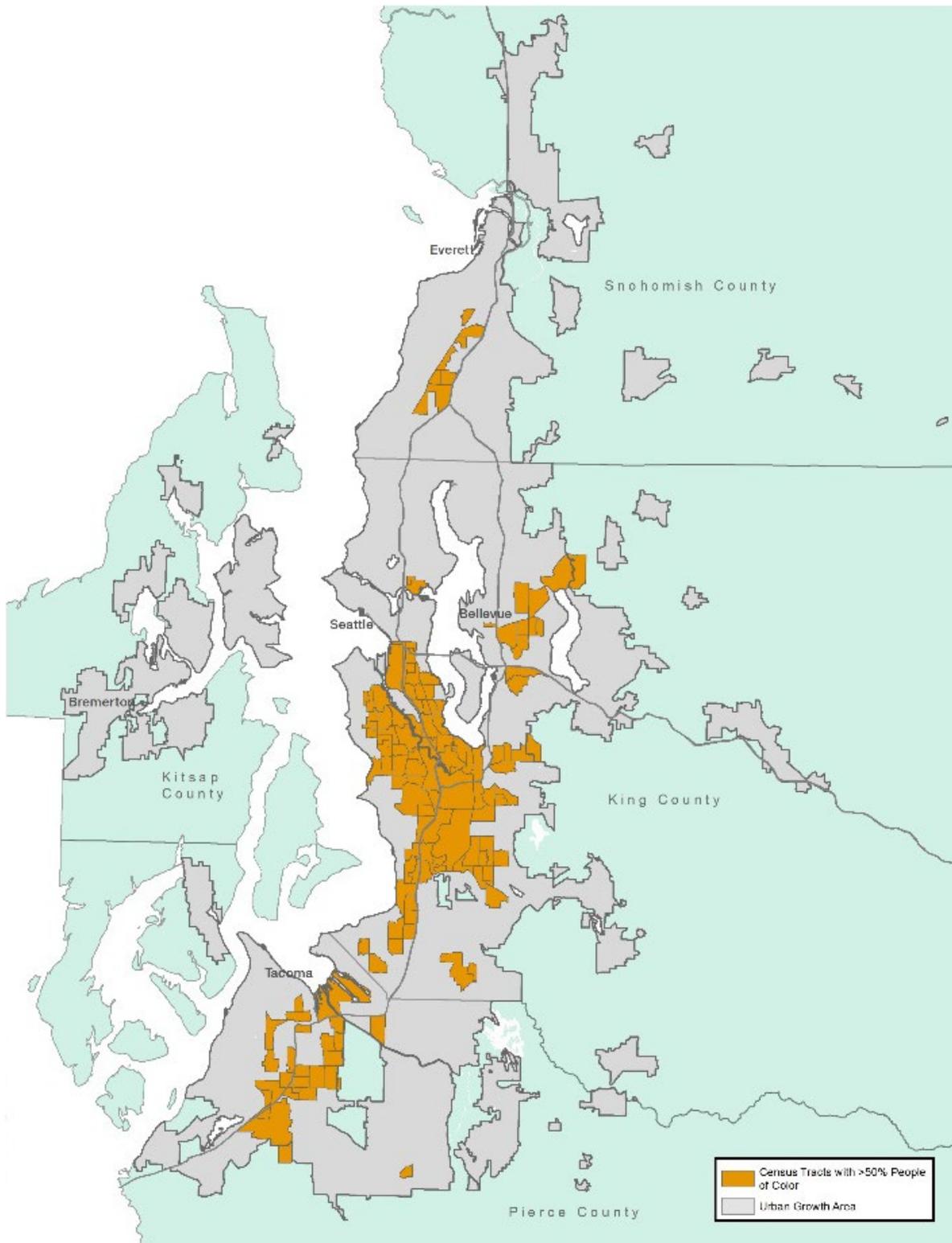


Figure 13. Low-Income Equity Geographies



Source: U.S. Census Bureau, PSRC

Figure 14. People of Color Equity Geographies



Source: U.S. Census Bureau, PSRC

The low-income equity geographies represent a small share of the overall regional population at 6 percent. These census tracts are dispersed throughout the region, with concentrations along Interstate 5 in Snohomish and Pierce counties and in south King County and Bremerton.

Seventeen percent of the region’s population lives in the people of color equity geographies. These census tracts are found in Snohomish County along SR 99, in south and east King County, and along Interstate 5 in Pierce County.

**Table 11. Regional Population Share of Equity Geographies**

	Total Population in Geography	Total Regional Population	Regional Share in Geography
Low-income equity geographies	233,800	3,928,600	6%
People of color equity geographies	681,700	3,928,600	17%

Source: 2012-16 ACS 5-Year Estimates

***People with Low Incomes***

Table 12 provides additional demographic information on the low-income equity geographies compared to the rest of the region for different demographic characteristics.

**Table 12. Low-Income Equity Geographies – Demographics**

	Low-income equity geographies	Remainder of the region	Region
Low-income population	57%	22%	24%
People of Color	57%	32%	34%
Limited English proficiency	19%	8%	8%
65+	9%	13%	12%
Under 18	23%	22%	22%
Persons with disability	18%	13%	14%
Zero vehicle households	22%	7%	8%

Source: 2012-16 ACS 5-Year Estimates

A higher share (57 percent) of people living in the low-income equity geographies are people of color than in other communities. Similarly, higher concentrations of people with limited English proficiency, persons with disabilities, and households with zero vehicles live in these areas.

## ***Communities of Color***

Table 13 provides additional demographic information on people of color equity geographies compared to the rest of the region for different demographic characteristics.

**Table 13. People of Color Equity Geographies – Demographics**

	<b>People of color equity geographies</b>	<b>Remainder of the region</b>	<b>Region</b>
Low-income population	40%	21%	24%
People of color	62%	28%	34%
Limited English proficiency	20%	6%	8%
65+	11%	13%	12%
Under 18	24%	22%	22%
Persons with disability	15%	13%	14%
Zero vehicle households	12%	7%	8%

Source: 2012-16 ACS 5-Year Estimates

A higher concentration of people with low incomes (40 percent) live in the people of color equity geographies than the region as a whole (24 percent). These areas also have a much higher share of people with limited English proficiency and households without a vehicle.



## **Part 3: Alternatives Analysis**

The analysis in this appendix consolidates data from the main document of the Final SEIS, focusing on the equity geographies compared to the rest of the region. It includes additional information on these measures and their potential significance for current and future residents of these areas. It also includes a qualitative discussion of impacts that can be differentiated between communities of color and low-income communities and the population as a whole, along with potential mitigation measures.

As mentioned previously, discussions of impacts to the equity geographies are modeled using existing locations of concentration of people of color and people with low incomes. It is likely that the locations of these communities would change by 2050, but the general impacts described would remain similar.

For the elements of earth and visual quality and aesthetic resources, impacts or burdens are not anticipated to be different between alternatives at the regional level for the equity geographies or for communities of color and low-income communities generally.

Mitigation measures are procedures or actions taken to avoid, minimize, and mitigate project effects. Mitigation in the context of this Final SEIS includes potential measures that have informed policies and actions developed as part of VISION 2050 to implement the Regional Growth Strategy. Other mitigation measures provide a framework for continued policy discussions for the region.

### **Description of Alternatives**

VISION 2050 extends the growth strategy an additional 10 years and considers adjustments that may account for changes to the region, growth patterns, and new policy direction. This Final SEIS considers a no action alternative (Stay the Course), and three growth pattern alternatives, Transit Focused Growth, Reset Urban Growth, and Preferred Growth, that provide distinct options for analysis and consideration, while falling within the range of growth alternatives considered in the VISION 2040 Final Environmental Impact Statement.

The Preferred Growth Alternative considers a compact growth pattern based on the VISION 2040 Regional Growth Strategy that assumes accelerated growth near the region's existing and planned transit investments. The Preferred Growth Alternative is primarily based on the Transit Focused Growth Alternative, with adjustments to some growth allocations, regional geographies, and the high-capacity transit growth goal to reflect growth trends and local planning considerations. This alternative was developed

based on the analysis presented in the Draft SEIS, public comments, supplemental data, and perspectives of PSRC’s Growth Management Policy Board.

The Stay the Course Alternative is a direct extension of the VISION 2040 Regional Growth Strategy and assumes a compact growth pattern, focused in the largest and most transit-connected cities in the region with designated regional growth centers. Stay the Course serves as the required “no action alternative” that must be evaluated in accordance with the State Environmental Policy Act.

The Transit Focused Growth Alternative considers a more compact growth pattern that assumes accelerated growth near the region’s existing and planned transit investments.

The Reset Urban Growth Alternative shares similarities with actual growth patterns that occurred from 2000 to 2016 and assumes a more distributed growth pattern throughout the urban area.

The four alternatives assign varying amounts of growth to the equity geographies. The varied distribution of growth between the four alternatives would have different levels of impact on these areas in comparison to the base year. The analysis below compares the impacts of the alternatives on these areas and provides potential mitigation measures.

## **Population**

All alternatives assume the same amount of regional growth in population and employment from 2017 to 2050—1.8 million additional people and 1.2 million additional jobs. The difference between alternatives is how the growth is allocated among the regional geographies—Metropolitan Cities, Core Cities, HCT Communities, Cities & Towns, Urban Unincorporated, and Rural areas—and among the region’s four counties (described in detail in Sections 3.2 through 3.4 of the Final SEIS).

These patterns of growth distribution impact how much growth goes into the equity geographies.

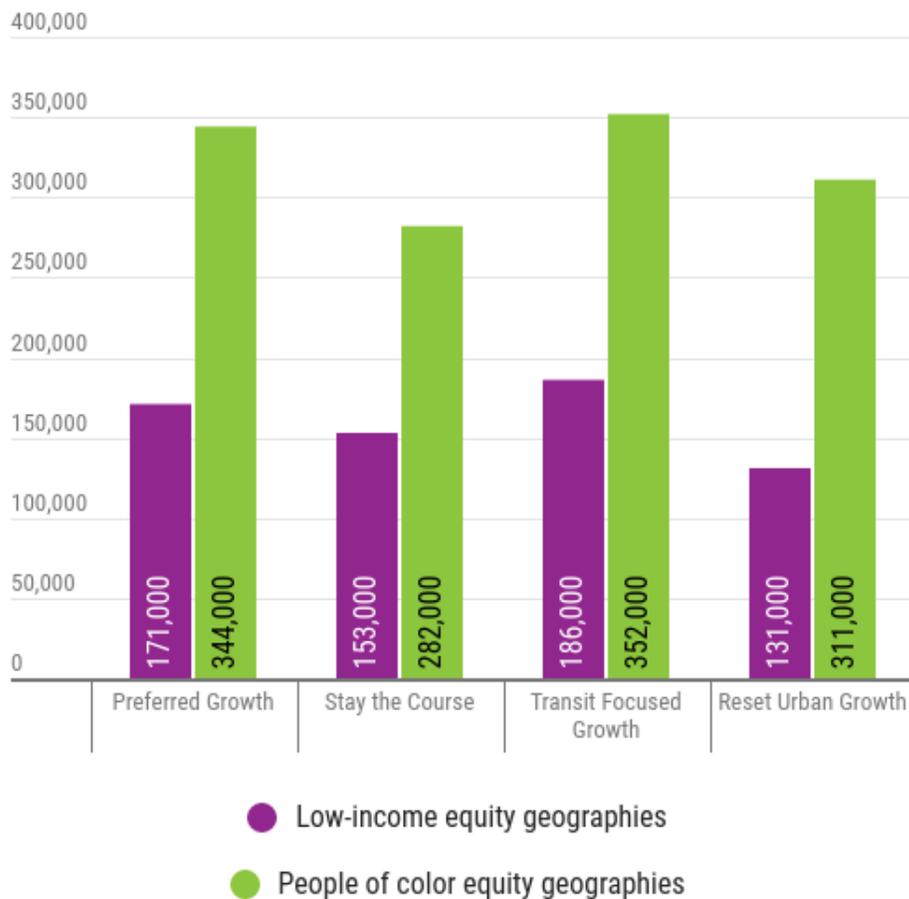
Table 14. 2017-2050 Population Change by Alternative

	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	Population 2017	Population Change 2017-2050	% change						
Low-income equity geographies	239,000	171,000	72%	153,000	64%	186,000	78%	131,000	55%
Non-Low-income equity geographies	3,828,000	1,586,000	41%	1,603,000	42%	1,571,000	41%	1,625,000	42%
People of color equity geographies	698,000	344,000	49%	282,000	40%	352,000	50%	311,000	45%
Non-People of color equity geographies	3,369,000	1,414,000	42%	1,474,000	44%	1,405,000	42%	1,446,000	43%
Region	4,067,000	1,756,000	43%	1,756,000	43%	1,756,000	43%	1,756,000	43%

Source: PSRC

Transit Focused Growth directs the most growth to the equity geographies. Reset Urban growth directs the least amount of growth to low-income equity geographies and Stay the Course directs the least to people of color equity geographies.

Figure 15. 2017-2050 Population Change by Alternative, Equity Geographies



Growth between now and 2050 will affect the communities living in these census tracts. The following sections describe the potential impacts of the growth patterns associated with the alternatives to better understand implications for these areas compared to the rest of the region.

# Employment and Housing

Table 15. Summary of Impacts and Benefits to Equity Geographies: Employment and Housing

Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
<p><b>Jobs-housing balance:</b> The Preferred Growth Alternative shows a better balance of jobs and housing for the equity geographies compared to Stay the Course and Reset Urban Growth. The ratio is still well above the regional average, indicating these communities are jobs-rich and housing may be less affordable or available.</p> <p><b>Housing densities:</b> Growth in moderate-density housing accounts for 15 percent of added housing at a regional level for the Preferred Growth Alternative, tied with Stay the Course. This alternative has the second-highest level of moderate-density housing stock growth overall for the equity geographies.</p>	<p><b>Jobs-housing balance:</b> Tied with Reset Urban Growth, Stay the Course shows less improvement in the balance of jobs and housing for the equity geographies compared to the Preferred Growth Alternative and Transit Focused Growth. The equity geographies are estimated to be in very jobs-rich areas in 2050, with jobs-housing indices well over the regional average of 1.0, indicating housing may be unaffordable or unavailable.</p> <p><b>Housing densities:</b> Growth in moderate-density housing accounts for 15 percent of added housing at a regional level, tied with the Preferred Growth Alternative. This alternative has the third-highest level of moderate-density housing stock growth overall for the equity geographies.</p>	<p><b>Jobs-housing balance:</b> Transit Focused Growth shows a better balance of jobs and housing for the equity geographies compared to the other alternatives but is still well above the regional average.</p> <p><b>Housing densities:</b> Growth in moderate-density housing accounts for 16 percent of added housing at a regional level for Transit Focused Growth, the highest of the alternatives. This alternative has the highest level of moderate-density housing stock growth overall for the equity geographies.</p>	<p><b>Jobs-housing balance:</b> Tied with Stay the Course, Reset Urban Growth shows less improvement in the balance of jobs and housing for the equity geographies compared to the Preferred Growth Alternative and Transit Focused Growth, with jobs-housing ratios well over the regional average of 1.0, indicating housing may be unaffordable or unavailable.</p> <p><b>Housing densities:</b> Growth in moderate-density housing accounts for 14 percent of added housing at a regional level for Reset Urban Growth, the lowest level of the alternatives. Alternative has the lowest level of moderate-density housing stock growth overall for the equity geographies.</p>

Housing affordability, displacement risk, and growth pressures are issues throughout the region for many people of color and people with low incomes. Housing affordability is described in Section 2.3 of the Final SEIS and in the existing conditions section of this appendix. The region is experiencing an affordability crisis that has a large impact on these communities.

The continued population growth out to 2050 in the region may contribute to greater stress on the housing availability for the region’s residents.

### ***Jobs-Housing Balance***

Jobs-housing balance is a planning concept that advocates for housing and employment to be located close together. A jobs-housing ratio (here, indexed to the regional average) compares the number of jobs in relation to the number of housing units in a given area. A lack of housing, especially housing affordable to moderate- and low-income households close to job centers, will push demand for affordable homes to more distant areas, increasing commute times and development pressure outside of the urban growth area, which could lead to natural resource impacts and higher household transportation costs. A “balance” of jobs and housing is achieved when a community attains roughly the regional average ratio of 1.0.

**Table 16. Jobs-Housing Index, Equity Geographies**

	Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
	2017	2050	2050	2050	2050
Low-income equity geographies	2.07	1.66	1.67	1.59	1.73
Non-Low-income equity geographies	0.94	0.94	0.94	0.94	0.94
People of color equity geographies	1.58	1.38	1.50	1.37	1.42
Non-People of color equity geographies	0.89	0.90	0.89	0.91	0.90
Region	1.00	1.00	1.00	1.00	1.00

Source: PSRC

Note: An index of 1.0 indicates a regional average ratio between jobs and housing.

The jobs-housing ratios in the equity geographies show improvement from the 2017 Base Year under all alternatives. The equity geographies are estimated to be jobs-rich areas in 2050 in comparison to other census tracts, with jobs-housing ratios well over the regional average of 1.0. A high jobs-housing ratio indicates that housing for these communities may be unaffordable or unavailable and could lead to housing affordability challenges and competition over existing units, leading to potential displacement of residents. The jobs-housing ratio for the equity geographies show the most improvement under Transit Focused Growth compared to the other alternatives.

### ***Housing Density***

Since VISION 2040 was adopted in 2008, the region's housing market has experienced highs and lows, from the precipitous drop in housing prices and foreclosures during the last recession to the recent economic upswing and job growth that has led to rapid increases in rents and home prices.

Homeownership opportunities are becoming less accessible to middle- and lower-income households. A recent case study completed by PSRC indicates that moderate density housing tends to offer more affordable ownership options than either low or higher density housing options; however, today, moderate density occurs in smaller quantities throughout the region.<sup>18</sup>

In 2017, there were relatively large proportions of moderate-density housing in the equity geographies compared to the region as a whole. By 2050 it is anticipated that the strong growth in high-density housing will decrease the overall percentage of moderate-density housing. Large amounts of growth in high-density housing and nominal growth in moderate-density housing in the equity geographies could indicate pressure on the availability of lower cost housing choices and the risk of displacing existing communities of color and households with low incomes unless mitigated.

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<sup>18</sup> PSRC. 2018. "Middle" Housing is Scarce in Region. Puget Sound Regional Council. Seattle, WA. October 2018. Available at: <https://www.psrc.org/whats-happening/blog/%E2%80%9Cmiddle%E2%80%9D-housing-scarce-region>.

***People with Low Incomes***

Table 17. Housing Growth in Areas Zoned for Low-, Moderate-, and High-Density Development, Equity Geographies

		Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
		2017	2017-2050	2017-2050	2017-2050	2017-2050
Low-income equity geographies	Low Density	31%	5%	7%	5%	7%
	Moderate Density	35%	5%	8%	6%	6%
	High Density	34%	89%	85%	90%	87%
Non-Low-income equity geographies	Low Density	66%	26%	37%	22%	36%
	Moderate Density	19%	16%	16%	18%	15%
	High Density	15%	58%	48%	60%	49%
Region	Low Density	64%	24%	34%	20%	34%
	Moderate Density	20%	15%	15%	16%	14%
	High Density	16%	61%	51%	63%	52%

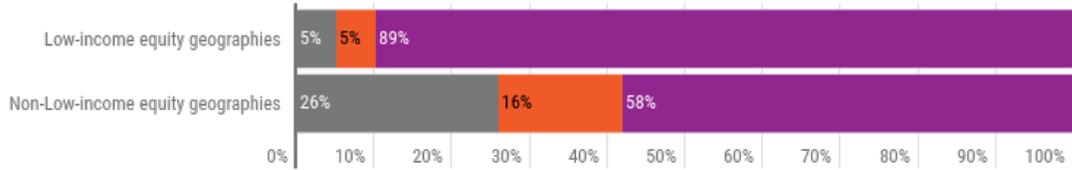
Source: PSRC

In each of the alternatives, the low-income equity geographies have large amounts (ranging from 85 to 90 percent) of growth in areas zoned for high-density. This increase in high-density housing could put greater stress on the residents of these areas due to the often-high cost of high-density housing and displacement pressures on existing communities. Growth in areas zoned for moderate density housing, which tends to be more affordable, is significantly less (ranging from 5 to 8 percent less) in the low-income equity geographies compared to the rest of the region.

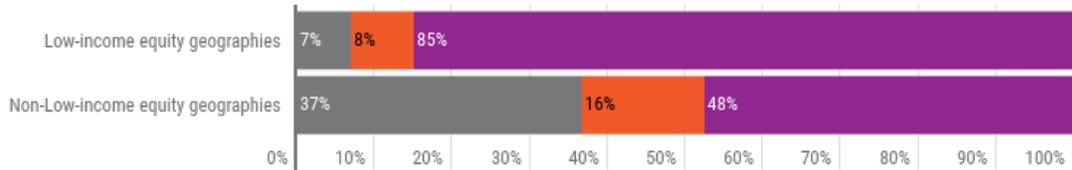


Figure 16. Housing Growth in Areas Zoned for Low-, Moderate-, and High- Density Development, Low-Income Equity Geographies, 2017-2050

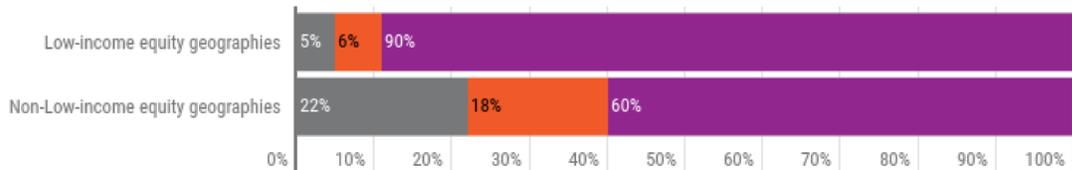
### Preferred Growth



### Stay the Course



### Transit Focused Growth



### Reset Urban Growth



● Low Density ● Moderate Density ● High Density

Source: PSRC

Note: Low density is defined as less than 12 units/acre, moderate density as 12-49 units/acre, and high density as 50+ units/acre. These groupings generally translate to single-family development; duplex, triplex, townhome, and low-rise apartment/condo buildings; and high-rise apartment/condo buildings.

## People of Color

Table 18. Housing Growth in Areas Zoned for Low-, Moderate-, and High-Density Development, People of Color Equity Geographies

		Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
		2017	2017-2050	2017-2050	2017-2050	2017-2050
People of color equity geographies	Low Density	46%	10%	13%	9%	13%
	Moderate Density	37%	12%	14%	13%	12%
	High Density	17%	78%	74%	77%	75%
Non-People of color equity geographies	Low Density	68%	28%	39%	24%	39%
	Moderate Density	17%	15%	15%	17%	14%
	High Density	15%	56%	46%	59%	47%
Region	Low Density	64%	24%	34%	20%	34%
	Moderate Density	20%	15%	15%	16%	14%
	High Density	16%	61%	51%	63%	52%

Source: PSRC

In each of the alternatives, the people of color equity geographies have large amounts of growth (ranging from 74 to 78 percent) in areas zoned for high-density. This is much larger than the amount of growth in these zoned areas than the rest of the region. Growth in moderate density housing is less (ranging from 1 to 4 percent less) in these areas under each alternative compared to the rest of the region.



Figure 17. Housing Growth in Areas Zoned for Low-, Moderate-, and High-Density Development, People of Color Equity Geographies, 2017-2050

### Preferred Growth



### Stay the Course



### Transit Focused Growth



### Reset Urban Growth



● Low Density ● Moderate Density ● High Density

Source: PSRC

Note: Low density is defined as less than 12 units/acre, moderate density as 12-49 units/acre, and high density as 50+ units/acre. These groupings generally translate to single-family development; duplex, triplex, townhome, and low-rise apartment/condo buildings; and high-rise apartment/condo buildings.

**Potential Mitigation Measures**

Without targeted intervention and local action, there’s potential for inequitable outcomes for residents of the equity geographies under each of the alternatives. To improve the jobs-housing ratio, planning processes that account for living-wage jobs within reasonable commute distances could be promoted in addition to affordable housing initiatives in proximity to employment centers. Measures to address cost barriers to attaining and preserving housing, including preservation and tenant protections, could be enacted. Potential mitigation measures and tools can be found in Table 19.

**Table 19. Potential Mitigation Measures: Housing and Employment**

<p><b>Topic: Preserve and Encourage the Creation of Affordable Housing</b></p>
<p>Potential Mitigation Measures:</p> <ul style="list-style-type: none"> <li>• Encourage planning practices to analyze and track housing issues and needs.*</li> <li>• Pursue design guidelines, design approaches, new technology, and alternative design approaches for small-lot development, zero lot line development, and reduced setback requirements.*</li> <li>• Encourage regulatory approaches such as zoning changes, minimum density ordinances, performance zoning, and inclusionary zoning.*</li> <li>• Fund a grant program to incentivize the planning and creation of affordable housing zones.</li> <li>• Provide financial incentives such as fee exemptions, density bonuses, tax credits, or transfer of development rights programs.*</li> <li>• Develop consistent definitions for “affordable,” “low-income,” and “moderate-income” among jurisdictions.*</li> <li>• Encourage the adoption of affordable housing targets by local jurisdictions.*</li> <li>• Establish housing targets specific to identified regional growth centers.*</li> <li>• Perform regular review and updates to local land use regulations to ensure consistency with affordable housing goals.*</li> <li>• Prioritize regional funding for transportation projects that support affordable housing.</li> <li>• Rezone for increased density near transit and services.</li> <li>• Expand housing diversity, particularly moderate-density housing.</li> <li>• Increase housing supply with access to employment.</li> <li>• Streamline regulations and reduce development restrictions, such as minimum parking requirements.</li> <li>• Increase funding available for affordable housing through federal low-income housing tax credits, local or countywide housing levies, or other similar measures.</li> <li>• Prevent displacement and preserve “naturally occurring” affordable housing through sales tax waivers, low-interest loans/revolving loan funds for preservation, and code enforcement.</li> <li>• Pursue tenant protections by providing multi-jurisdiction support for local enforcement of codes and affordability, support local implementation and enforcement to prevent source of income discrimination, and create legal defense funds for local jurisdictions. Include pursuing protections against discrimination for the use of Section 8 and other vouchers.</li> <li>• Create rental property safety programs that ensure that all rental housing units comply with life and safety standards ensuring a safe place for tenants to live.</li> <li>• Assess, monitor, and report housing data and trends.</li> </ul>

Table 19. Potential Mitigation Measures: Housing and Employment (continued)

Topic: Preserve and Encourage the Creation of Affordable Housing
<ul style="list-style-type: none"> <li>• Encourage a wider range of affordable housing for seniors, for special needs populations, and housing that accommodates a variety of family sizes.</li> <li>• Seek to create collaborative public/private partnerships to increase affordable housing development and development of tenant protection policies.</li> <li>• Develop and use form-based codes and allow affordable housing by-right to streamline the approval process.</li> <li>• Create a Housing Trust Fund that can tap private or public funds or money from the fee-in-lieu of development option to create affordable housing.</li> <li>• Create land banks to acquire, hold, manage and develop vacant properties for affordable housing.</li> <li>• Develop lease-purchase programs. This allows residents to rent homes they will eventually own, locking in lower interest and mortgage rates, while improving their credit history and increasing their savings prior to taking ownership of the homes.</li> <li>• Enable tax increment financing or other value capture financing (e.g., Community Revitalization Financing, Local Infrastructure Financing Tool, Local Revitalization Financing, Landscape Conservation and Local Infrastructure Program, and Local Improvement District) in places most likely to experience gentrification to fund affordable housing.</li> <li>• Set up impact investing opportunities to fund affordable housing projects.</li> <li>• Allocate increased funding for tenant and project-based vouchers.</li> <li>• Encourage the use of location-efficient mortgages.</li> <li>• Prioritize housing resources for long-term residents to prevent displacement.</li> <li>• Adopt microunit or single-room occupancy policies.</li> <li>• Defer property tax payments for long-time homeowners until they sell.</li> <li>• Protect developers from legal action once their project is approved to reduce the risk and cost of creating affordable housing.</li> <li>• Deed-restrict affordable housing to prevent rent from increasing when areas become more attractive.</li> <li>• Permit a developer to pay cash (equal to the value of affordable housing on the site) to the jurisdiction in lieu of providing the affordable units, which will go to financing developments of affordable housing.</li> <li>• Provide upzones in exchange for affordable housing.</li> <li>• In negotiations for contributions from a jurisdiction (e.g., financing, contributing parking, environmental cleanup costs) the jurisdiction should require affordable housing units or a fee in lieu of this affordable housing in exchange.</li> <li>• Incorporate an affordability requirement for Transfer of Development Rights programs.</li> <li>• Preserve affordable housing by tracking the expiration dates of subsidized apartment complexes and facilitating efforts to renew these contracts or the sale of these units to owners that will renew them.</li> <li>• Offer incentives to owners to fix up their properties in need of repair. In exchange for these incentives, the owner would agree to set aside units for affordable housing.</li> <li>• Waive code enforcement fines in exchange for the owner completing rehabilitation and making affordability commitments.</li> <li>• Eliminate unnecessary large minimum lot size requirements.</li> <li>• Eliminate zoning that only allows for single-family lots.</li> <li>• Adopt Just Cause eviction ordinances which allow tenants to be evicted only for specific reasons ("just causes"). Legal evictions under these policies can include such things as a failure to pay rent or violation of the lease terms.</li> <li>• Strengthen renter protections.</li> <li>• Offer foreclosure assistance programs that assist homeowners (financially or otherwise) when they are at risk of foreclosure. These programs may be funded with federal grants.</li> </ul>

Table 19. Potential Mitigation Measures: Housing and Employment (continued)

Topic: Preserve and Encourage the Creation of Affordable Housing
<ul style="list-style-type: none"> <li>• Charge commercial linkage fees and affordable housing impact/linkage fees (charges on developers per square foot of new market-rate, for commercial development and residential developments, respectively). These revenues are used to develop or preserve affordable housing.</li> <li>• Adopt station area plans and/or policies for all HCT Communities that are expected to attract significant new population or employment growth.</li> <li>• Conduct an inventory of existing housing, including the cost, size, condition, and use of subsidies of existing units, as part of the housing needs assessment. Use this information to identify potential sites for preservation and/or replacement.</li> <li>• Identify properties that contain affordable units that are at risk of displacement or conversion.</li> <li>• Explore options for contributing capital to a transit-oriented development property acquisition fund.</li> <li>• Expedited permitting for projects that include affordable units.</li> </ul>

## Land Use

Table 20. Summary of Impacts and Benefits to Equity Geographies: Land Use

Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
<p><b>Land Use:</b> Similar to Transit Focused Growth, the equity geographies have a larger percentage of population and employment growth located in proximity to <b>high-capacity transit</b> (87 percent and 92 percent) compared to Stay the Course, Reset Urban Growth, and the region as a whole (69 percent).</p> <p>The equity geographies have a larger percentage of population and employment growth located in proximity to <b>all transit service</b> (87 percent and 90 percent, respectively) compared to Stay the Course, Reset Urban Growth, and the region as a whole (76 percent).</p>	<p><b>Land Use:</b> The equity geographies have lower percentages of population and employment growth located in proximity to <b>high-capacity transit</b> (62 percent and 68 percent) compared to the Preferred Growth Alternative and Transit Focused Growth but higher compared to Reset Urban Growth and the region as a whole (46 percent). These communities would have improved access to transit but would likely experience elevated risk of displacement. Absolute values were taken into consideration for this analysis (see Appendix B).</p> <p>The equity geographies have lower percentages of population and employment growth located in proximity to <b>all transit service</b> (76 percent and 82 percent) compared to the Preferred Growth Alternative and Transit Focused Growth but higher compared to Reset Urban Growth and the region as a whole (65 percent).</p>	<p><b>Land Use:</b> The equity geographies have the highest percentages of population and employment growth located in proximity to <b>high-capacity transit</b> (89 percent and 92 percent) compared to the other alternatives and the region as a whole (75 percent).</p> <p>The equity geographies have the highest percentages of population and employment growth located in proximity to <b>all transit service</b> (88 percent and 90 percent) compared to the other alternatives and the region as a whole (81 percent).</p>	<p><b>Land Use:</b> The equity geographies have lower percentages of population and employment growth located in proximity to <b>high-capacity transit</b> (63 percent and 68 percent) compared to the other alternatives but higher compared to the region as a whole (45 percent).</p> <p>The equity geographies have lower percentages of population and employment growth located in proximity to <b>all transit service</b> (75 percent and 79 percent) compared to the other alternatives but higher compared to the region as a whole (61 percent).</p>

Land use policies drive urban and rural growth. The investments in high-capacity transit between now and 2050 provide an opportunity for people of color and people with low incomes to have greater access to transportation options and the opportunities and affordability these may provide. However, these investments could increase displacement pressures on current residents.

Growth around existing and planned<sup>19</sup> high-capacity transit—light rail, commuter rail, bus rapid transit, and ferry terminals—can encourage transit-oriented development. Transit-oriented development can result in numerous benefits such as reducing vehicle use, promoting walking and biking, and reducing sprawl.

Transit stations can serve as a link between land use and transportation—connecting residents and workers to jobs and services in the rest of the region and offering access to nearby civic and public spaces. Well-designed transit-oriented communities, the areas immediately surrounding high-capacity transit service, can lead to a range of substantial social and environmental benefits. Transit-oriented communities have the potential to:

- Provide economic benefit to the region
- Promote health and safety by encouraging walking and biking, cutting air pollution, reducing motor vehicle collisions, and increasing access to healthy food
- Lower household expenses for transportation, and support housing affordability
- Reduce municipal infrastructure costs
- Help meet the growing demand for “walkable communities”
- Reduce sprawl and thereby help conserve farms and natural ecosystems and protect water quality
- Cut energy consumption and greenhouse gas emissions associated with both transportation and the built environment

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<sup>19</sup> Planned transit investments included those anticipated in the 2040 Regional Transportation Plan.

**Table 21. Population and Employment in Proximity to High-Capacity Transit, Equity Geographies**

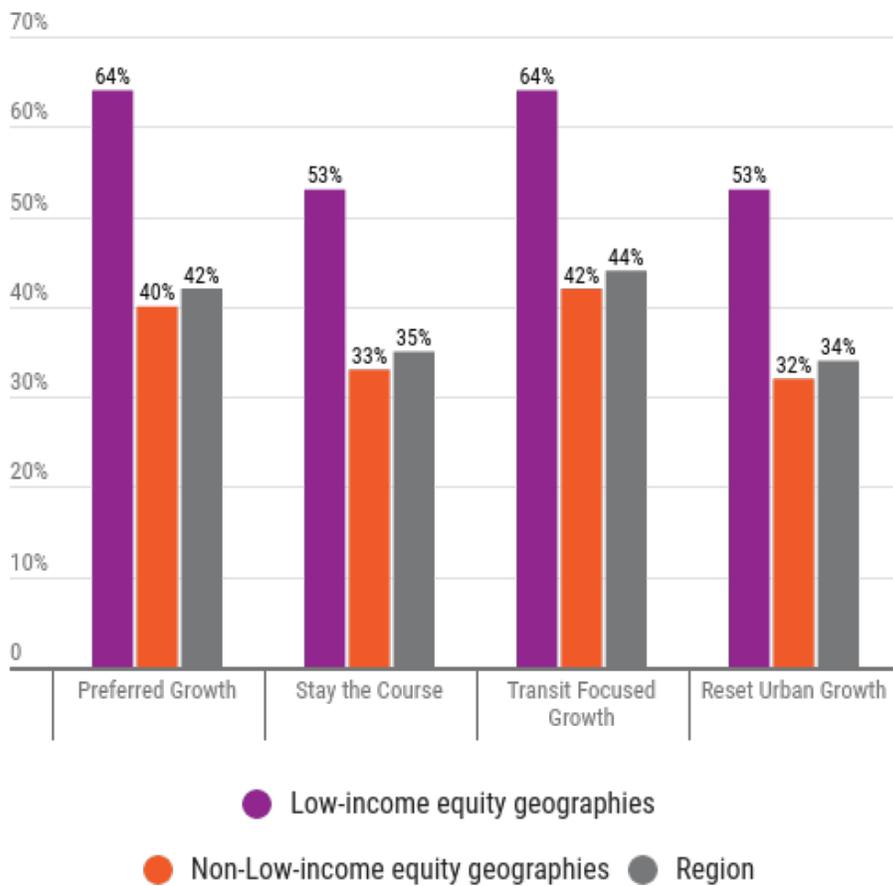
	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	2017	2017-2050	2050	2017-2050	2050	2017-2050	2050	2017-2050	2050
Low-income equity geographies	44%	92%	64%	68%	53%	92%	64%	68%	53%
Non-Low-income equity geographies	28%	66%	40%	44%	33%	73%	42%	43%	32%
People of color equity geographies	42%	87%	57%	62%	48%	89%	57%	63%	49%
Non-People of color equity geographies	26%	64%	38%	42%	31%	71%	40%	40%	30%
Region	29%	69%	42%	46%	35%	75%	44%	45%	34%

Source: PSRC

Note: Proximity to high capacity transit service is defined as within designated regional growth centers; within 1/2 mile of light rail stations, commuter rail stations, and ferry terminals in the UGA; and within 1/4 mile of bus rapid transit stops in the UGA.

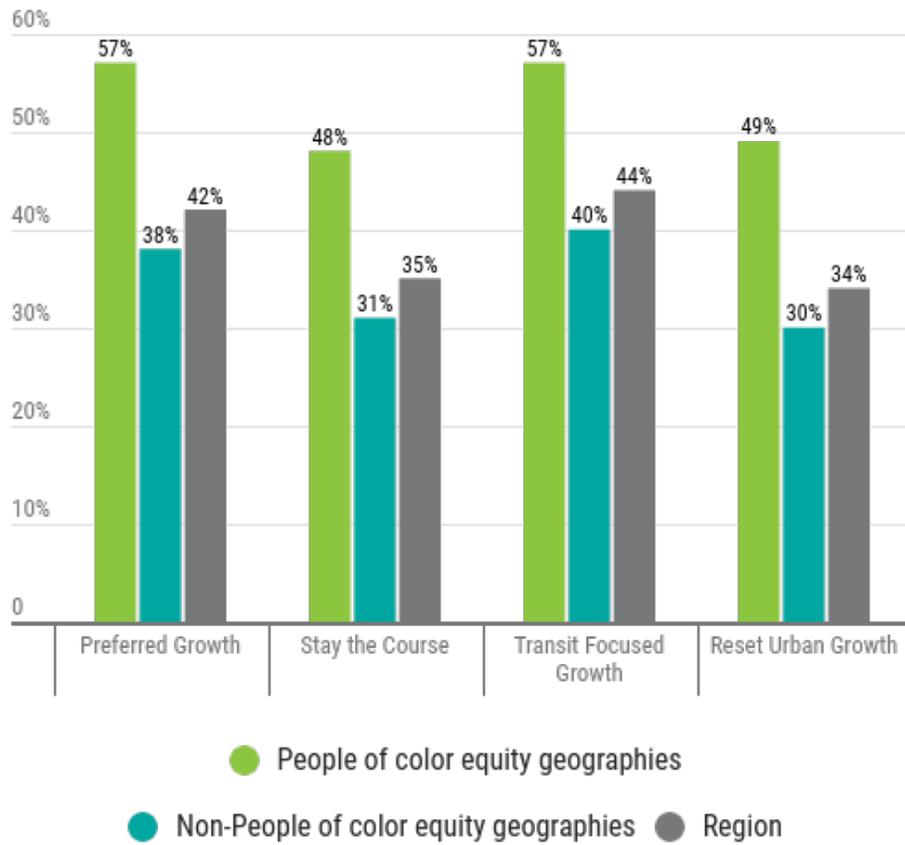
The equity geographies have a larger share of population and employment located in proximity to high-capacity transit compared to the region as a whole. This indicates that residents in these communities would have improved access to transit but also could experience an elevated risk of displacement. The measure evaluating the risk of displacement is examined later in this document. Under Transit Focused Growth, the equity geographies would see the largest increase of growth in proximity to transit.

Figure 18. Population and Employment in Proximity to High-Capacity Transit, Low-Income Equity Geographies, 2050



Source: PSRC

Figure 19. Population and Employment in Proximity to High-Capacity Transit, People of Color Equity Geographies, 2050



Source: PSRC

# Transportation

Table 22. Summary of Impacts and Benefits to Equity Geographies: Transportation

Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
<p>For the equity geographies, transportation benefits under the Preferred Growth Alternative are generally slightly less than Transit Focused Growth and better than Stay the Course and Reset Urban Growth. Benefits to these areas are better than the region as a whole. These benefits include less driving and time spent in traffic, increased walking, and greater access to jobs via walking, biking, and transit.</p>	<p>For the equity geographies, transportation benefits under Stay the Course are generally slightly better than Reset Urban Growth and less than the Preferred Growth Alternative and Transit Focused Growth. Benefits to the equity geographies are better than the region as a whole.</p>	<p>For the equity geographies, transportation benefits under Transit Focused Growth are slightly better than the Preferred Growth Alternative and better than Stay the Course, Reset Urban Growth, and the region as a whole.</p>	<p>For the equity geographies, transportation benefits under Reset Urban Growth are generally slightly less than Stay the Course and noticeably less than the Preferred Growth Alternative and Transit Focused Growth. Benefits to these areas are better than the region as a whole.</p>

With continued regional population and employment growth between now and 2050, increased demand will be placed on the transportation system. To model travel behavior in 2050, all investments planned in the Regional Transportation Plan<sup>20</sup> are assumed to be in place. This provides a backdrop for comparing effects of each regional growth alternative. The following sections describe transportation system performance for the following measures:

- **Average daily vehicle miles and minutes** – how far the average person is driving each day by car and how much time is spent in a car for both commuting and personal trips
- **Average annual vehicle delay** – the amount of time the average person spends in congestion each year
- **Transportation mode share** – the percentage of both commute and non-commute trips made by people driving alone, carpooling, using transit and school buses, walking, or biking
- **Jobs accessible by transit, biking, and walking** – number of jobs located within a 45-minute transit trip, a 1-mile walk trip, or a 3-mile bike trip

<sup>20</sup> PSRC. 2018. The Regional Transportation Plan—2018. Puget Sound Regional Council. Seattle, WA. May 2018.

Personal vehicle travel costs households a significant amount of money in vehicle ownership, operation, and maintenance. Reducing time spent in a vehicle could decrease these costs along with increasing time for other activities. Households with low incomes could be most impacted by these high costs and may benefit most by shorter trip distances and times, the availability of other more affordable modes of travel, and jobs within close proximity to where they live.



PSRC

## Average Daily Vehicle Minutes Traveled and Delay by Residents

Table 23. Average Daily Vehicle Minutes Traveled by Residents, Equity Geographies

	Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
	2014	2050	2050	2050	2050
Low-income equity geographies	27.1	22.2	23.4	22.2	23.7
Non-Low-income equity geographies	38.1	33.9	35.2	33.6	35.7
People of color equity geographies	32.3	28.2	29.1	28.4	29.5
Non-People of color equity geographies	38.6	34.2	35.5	33.7	36.1
Region	37.5	33.2	34.5	32.8	34.9

Source: PSRC

Note: This measure is calculated for all trips that use a private vehicle (both drive alone and shared ride) for residents in each defined geography. This metric does not include miles driven by trucks or by people who live outside the region.

Table 24. Average Annual Vehicle Delay Hours by Residents, Equity Geographies

	Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
	2014	2050	2050	2050	2050
Low-income equity geographies	14.6	17.7	19.1	17.3	19.7
Non-Low-income equity geographies	21.7	28.9	31.0	28.3	31.9
People of color equity geographies	18.4	23.2	23.7	23.3	25.2
Non-People of color equity geographies	21.9	29.3	31.5	28.5	32.4
Region	21.3	28.2	30.2	27.5	31.2

Source: PSRC

Note: This measure is calculated for all trips that use a private vehicle (both drive alone and shared ride) for residents in each defined geography. This metric does not include delay for trucks or for people who live outside the region. Delay is measured as the difference between travel in the middle of the night (considered "free-flow") and travel during a specific time of day.

Under all alternatives, residents in equity geographies drive less and spend less time in traffic compared to the region as a whole.

### **Mode Share**

**Table 25. Share of Commute Trips by Travel Mode, Equity Geographies**

		Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
		2014	2050	2050	2050	2050
Low-income equity geographies	SOV	71%	56%	59%	56%	59%
	HOV	14%	13%	13%	13%	13%
	Transit	6%	11%	9%	11%	10%
	Walk	6%	15%	14%	16%	13%
	Bike	4%	5%	5%	5%	5%
People of color equity geographies	SOV	72%	61%	63%	60%	62%
	HOV	14%	14%	14%	14%	14%
	Transit	7%	11%	10%	11%	10%
	Walk	5%	10%	9%	10%	9%
	Bike	3%	5%	4%	5%	4%
Region	SOV	71%	62%	63%	61%	64%
	HOV	14%	13%	13%	13%	13%
	Transit	6%	10%	9%	10%	9%
	Walk	6%	11%	10%	11%	10%
	Bike	3%	4%	4%	4%	4%

Source: PSRC

SOV – single-occupancy vehicle

HOV – high-occupancy vehicle

Table 26. Share of Non-Commute Trips by Travel Mode, Equity Geographies

		Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
		2014	2050	2050	2050	2050
Low-income equity geographies	SOV	32%	25%	27%	25%	27%
	HOV	40%	35%	35%	35%	36%
	Transit/School Bus	6%	7%	7%	7%	7%
	Walk	20%	31%	29%	31%	28%
	Bike	2%	2%	2%	2%	2%
People of color equity geographies	SOV	33%	28%	29%	28%	29%
	HOV	43%	39%	39%	39%	39%
	Transit/School Bus	5%	7%	7%	7%	7%
	Walk	17%	25%	23%	25%	23%
	Bike	1%	2%	2%	2%	2%
Region	SOV	33%	28%	29%	28%	29%
	HOV	42%	39%	40%	39%	40%
	Transit/School Bus	5%	6%	6%	6%	6%
	Walk	18%	25%	23%	25%	23%
	Bike	1%	2%	2%	2%	2%

Source: PSRC

SOV – single-occupancy vehicle

HOV – high-occupancy vehicle

Residents of the low-income equity geographies drive alone less and walk more for both work and personal trips compared to the region as a whole. Residents of the people of color equity geographies have a similar mode share compared to the region as a whole.

## Access to Jobs

Table 27. Average Jobs Accessible per Resident by Travel Mode, Equity Geographies

		Base Year	Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
		2014	2050	2050	2050	2050
Low-income equity geographies	Jobs within 45-min Transit Trip*	158,400	396,200	361,800	384,600	386,100
	Jobs within 1-mile Walk Trip	11,200	30,900	27,800	30,100	27,400
	Jobs within 3-mile Bike Trip	51,500	106,600	104,000	103,500	104,900
Non-Low-income equity geographies	Jobs within 45-min Transit Trip*	111,700	281,300	243,200	286,200	254,500
	Jobs within 1-mile Walk Trip	6,900	19,500	16,600	19,700	17,600
	Jobs within 3-mile Bike Trip	42,300	86,000	77,700	86,400	80,500
People of color equity geographies	Jobs within 45-min Transit Trip*	140,700	386,100	351,800	383,300	362,900
	Jobs within 1-mile Walk Trip	6,100	17,900	15,600	17,700	15,800
	Jobs within 3-mile Bike Trip	47,600	100,300	95,600	99,500	96,800
Non-People of color equity geographies	Jobs within 45-min Transit Trip*	109,100	268,700	231,300	273,900	242,300
	Jobs within 1-mile Walk Trip	7,300	20,800	17,700	21,100	18,800
	Jobs within 3-mile Bike Trip	41,900	84,700	76,300	85,000	79,000
Region	Jobs within 45-min Transit Trip*	114,300	289,600	251,400	293,600	263,100
	Jobs within 1-mile Walk Trip	7,100	20,300	17,400	20,500	18,300
	Jobs within 3-mile Bike Trip	42,800	87,500	79,600	87,700	82,100

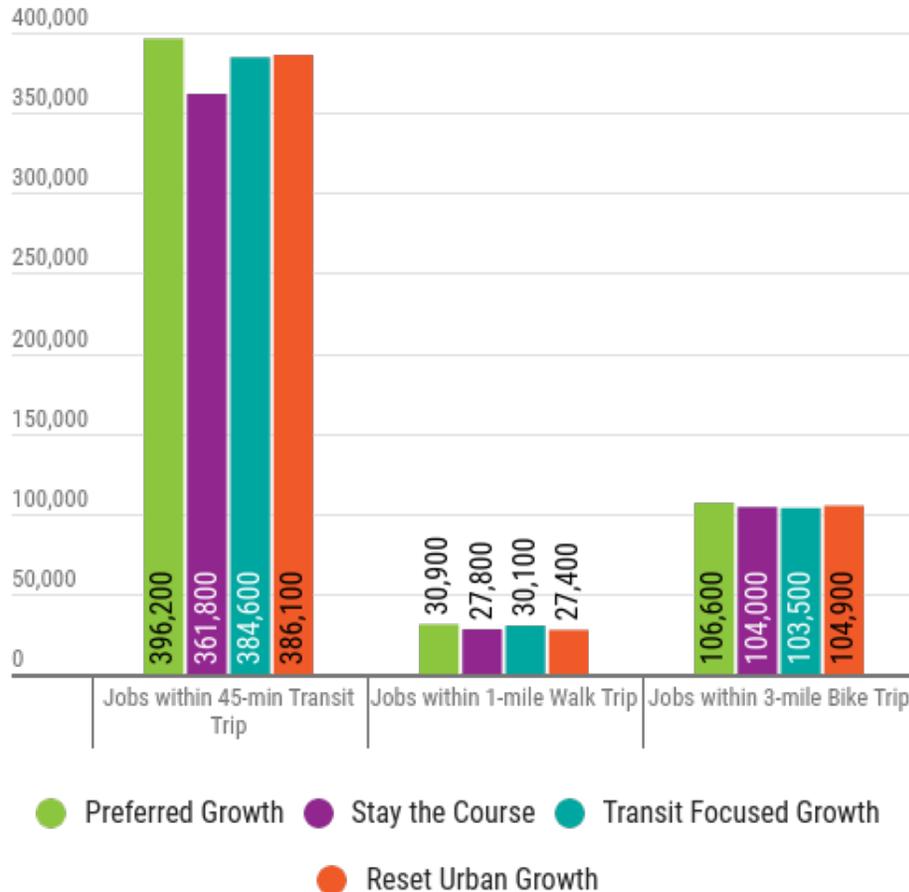
Source: PSRC

Note: Values represent the average number of jobs accessible per capita (resident) by home location.

\*A 45-minute transit trip includes walk, wait, and in-transit time.

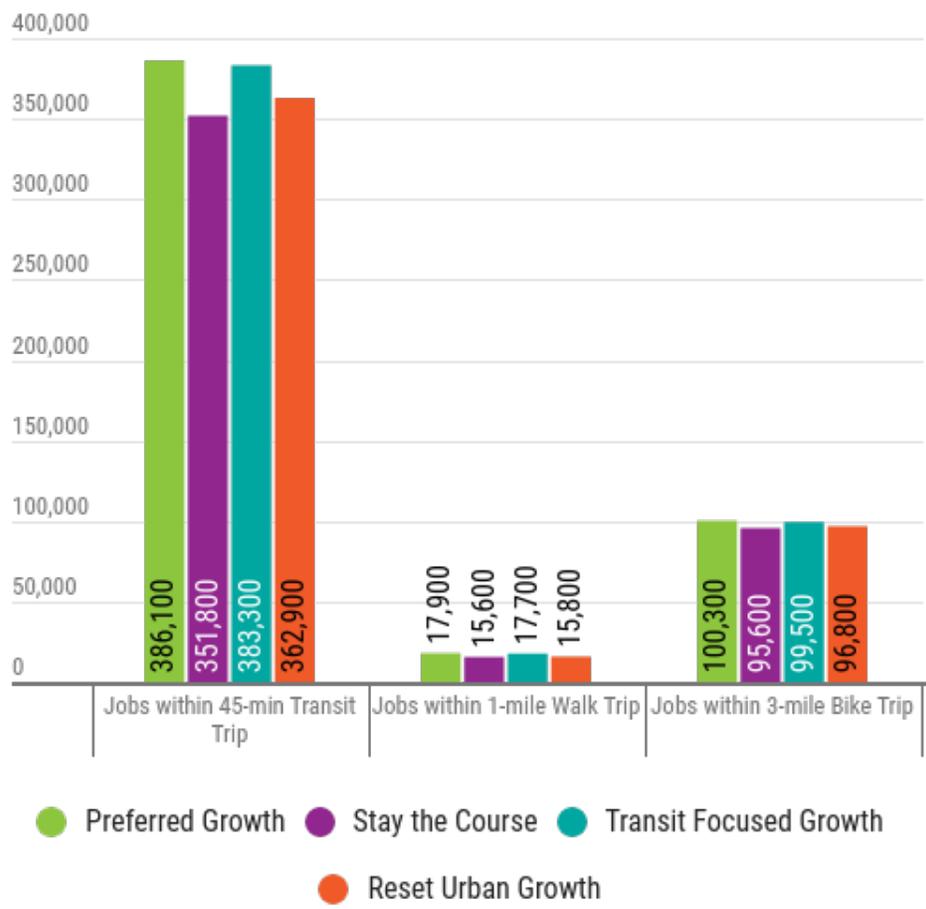
More residents of the low-income equity geographies have greater access to jobs via walking, biking, or transit than residents who live in the rest of the region. More residents of the people of color equity geographies have greater access to more jobs via transit and biking, but not walking.

Figure 20. Average Jobs Accessible per Resident by Travel Mode, Low-Income Equity Geographies, 2050



Source: PSRC

Figure 21. Average Jobs Accessible per Resident by Travel Mode, People of Color Equity Geographies, 2050



Source: PSRC

### ***Potential Mitigation Measures***

Although the equity geographies perform well under all alternatives in the transportation measures, ensuring that the benefits associated with these measures are felt by existing residents may require some intervention. Mitigation measures for all of the alternatives are listed in Table 4.3-3 of the Final SEIS. Some of these measures will be important for these communities, including increasing access to low income fares (ORCA Lift) and including safety considerations in transportation facilities, among others. Other mitigation measures in Table 19 related to the preservation of affordable housing are also applicable for ensuring that communities have access to these benefits.

# Ecosystems, Water Quality, and Hydrology

Past growth and development have degraded ecosystems, water quality, and hydrology, and led to declines of many plant and animal species. Many organizations are working on efforts to restore these resources and prevent future impacts.

For all alternatives, impacts from growth that degrade water quality and habitat can contribute to the decline of salmon and other plant and animal species of significance to tribes in the region<sup>21</sup>. Impacts to fisheries also affect low-income communities who fish to augment their food supply.

Measures to mitigate impacts to ecosystems, water quality, and hydrology are listed in Tables 4.5-1 and 4.6-2.

# Public Services and Utilities, Energy

Table 28. Summary of Impacts and Benefits to Low-Income Communities: Public Services and Utilities, Energy

Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
For the Preferred Growth Alternative, similar to Stay the Course and Transit Focused Growth, compact development where existing utilities are located would help keep utility and living costs down, a benefit to low-income communities.	For Stay the Course, similar to the Preferred Growth Alternative and Transit Focused Growth, compact development where existing utilities are located would help keep utility and living costs down, a benefit to low-income communities.	For Transit Focused Growth, similar to the Preferred Growth Alternative and Stay the Course, compact development where existing utilities are located would help keep utility and living costs down, a benefit to low-income communities.	More dispersed development may require more expansion or development of utilities and services compared to the other alternatives, which could add utility and living costs, an adverse impact to low-income communities.
For all alternatives, growth would require expansion or development of new facilities.			

As the region adds approximately 1.8 million people and 1.2 million jobs between now and 2050, there will be demand for additional utilities, including energy, solid waste, sanitary sewer, water, and stormwater. In addition, general expansions of fire and police services, health and medical services, schools, and other services are anticipated.

Compact development patterns where pre-existing utilities are located would help keep utility and living costs down for all residents of the region—especially beneficial for residents with low incomes. The Preferred Growth and Transit Focused Growth alternatives would result in the most compact development patterns and less growth in

<sup>21</sup> Treaty Indian Tribes in Western Washington. 2011. Treaty Rights at Risk. Olympia, WA. Available at: <http://treatyrightsatrisk.org/>. July 2011.

Rural and Urban Unincorporated areas. The more dispersed development pattern associated with Reset Urban Growth may require extensions to underserved areas and could add utility and living costs, an adverse impact to low-income populations. Measures to mitigate impacts to public services, utilities, and energy are listed in Table 4.7-1 and 4.10-1.

## Parks and Recreation

Table 29. Summary of Impacts and Benefits to Equity Geographies: Parks and Recreation

Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
<p><b>Local parks resources:</b> In the equity geographies, the Preferred Growth Alternative results in the second-highest access to parks for residents. Access would be higher than the region as a whole.</p>	<p><b>Local parks resources:</b> In the equity geographies, Stay the Course results in the lowest access to parks for residents. Access would be higher than the region as a whole.</p>	<p><b>Local parks resources:</b> In the equity geographies, Transit Focused Growth results in the highest access to parks for residents. Access would be higher than the region as a whole.</p>	<p><b>Local parks resources:</b> In the equity geographies, Reset Urban Growth results in the third-highest access to parks for residents. Access would be higher than the region as a whole.</p>
<p><b>Regional parks resources:</b> Regional park access would be similar for all alternatives for the equity geographies.</p>			

Impacts common to parks, open space, and recreational facilities within the urban growth areas under all alternatives are similar to those described in the VISION 2040 FEIS. The addition of 1.8 million people to the region would impact existing park and recreation resources unless new parks and facilities are added at both the local and regional level. These impacts would include:

- Increased use, and in some locations, crowding. Increased use could lead to degradation of the recreational experience and potential degradation of the natural and open space resources.
- Increased demand for jurisdictions to redevelop existing parks and develop, operate, and maintain new facilities, which would increase capital expenses.
- The additional use of and demand for resources would likely increase conflicts between different types of recreational users and reduce the convenience of access.
- New development not properly planned with consideration of parks and open space needs, such as those identified in the Regional Open Space Conservation Plan, would lack access to parks, open spaces, and recreational resources within the urban growth area.

In addition to impacts to parks as described in the VISION 2040 FEIS, there is potential for impacts at a regional level for facilities outside of the urban growth area. At a regional level, access to wild open spaces such as national parks, forests, and wilderness areas would experience similar adverse impacts under all alternatives. The population growth in the region could substantially strain management of these resources, including trail and road maintenance and vegetation and ecosystem preservation. Because many people arrive at these resources by car, access would increase carbon emissions, and without mitigation, trailheads would likely become increasingly congested, impacting natural resources around access points and creating safety concerns.

In particular, the necessity of having a car to access regional parks, open space, and recreational resources creates a barrier for people with lower incomes, as they are less likely to own a car. Other barriers for people with low incomes include the cost of access passes, lack of leisure time, equipment, and familiarity with hiking and camping.<sup>22</sup>

### ***Urban Growth Area population in proximity to parks providing local urban access***

Under all alternatives and compared to the region as a whole, more growth would occur in equity geographies with access to local parks. In the equity geographies, Transit Focused Growth results in the highest access to parks for residents compared to the other alternatives. If not mitigated, people with lower incomes, who have fewer options to travel beyond their local parks than people with higher incomes, could be more affected by growth.

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<sup>22</sup> PSRC. 2018. Regional Open Space Conservation Plan. Puget Sound Regional Council. Seattle, WA. June 2018. Available at: <https://www.psrc.org/open-space>.

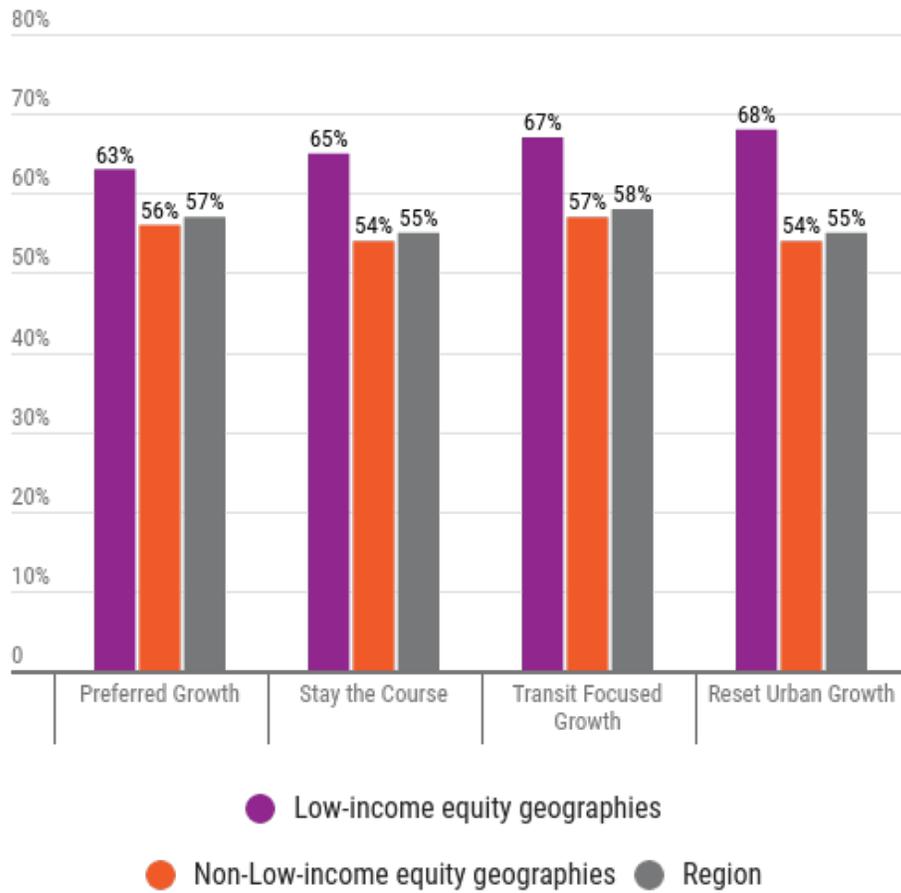
Table 30. Urban Growth Area Population in Proximity to Parks Providing Local Urban Access, Equity Geographies

	Base Year		Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	UGA Population 2017	Percent in Proximity to Parks	UGA Population Change 2017-2050	Percent Change in Proximity to Parks	UGA Population Change 2017-2050	Percent Change in Proximity to Parks	UGA Population Change 2017-2050	Percent Change in Proximity to Parks	UGA Population Change 2017-2050	Percent Change in Proximity to Parks
Low-income equity geographies	140,000	60%	108,000	63%	99,000	65%	124,000	67%	89,000	68%
Non-Low-income equity geographies	1,963,000	60%	871,000	56%	806,000	54%	882,000	57%	825,000	54%
People of color equity geographies	421,000	60%	196,000	57%	161,000	57%	211,000	60%	185,000	60%
Non-People of color equity geographies	1,682,000	59%	783,000	57%	744,000	54%	795,000	58%	729,000	54%
Region	2,096,000	59%	979,000	57%	905,000	55%	1,006,000	58%	914,000	55%

Source: PSRC

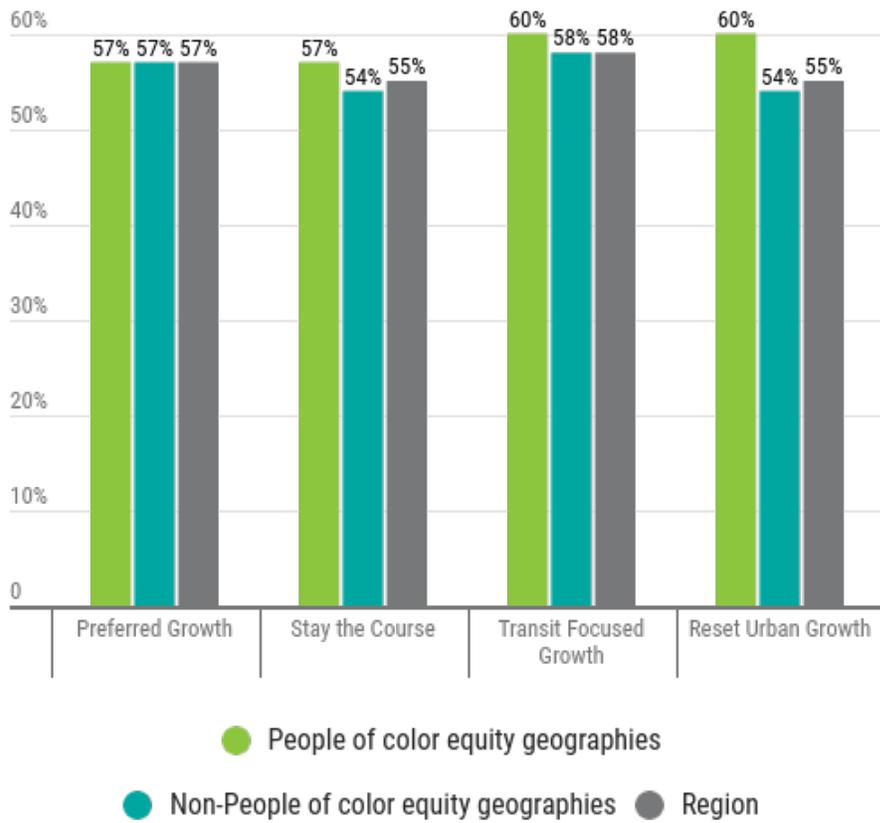
Note: Proximity is defined as within 1/4 mile; parks providing local urban access is defined as currently existing parks, trails, and other open space facilities located in the urban growth area or within 1/4 mile of the urban growth area boundary.

Figure 22. Urban Growth Area Population in Proximity to Parks Providing Local Urban Access, Low-Income Equity Geographies, Change 2017-2050



Source: PSRC

Figure 23. Urban Growth Area Population in Proximity to Parks Providing Local Urban Access, People of Color Equity Geographies, Change 2017-2050



Source: PSRC

## ***Potential Mitigation Measures***

Mitigation measures for the entire region are applicable to the equity geographies and are listed in Table 4.8-1. Examples of these mitigation measures include:

- Commit to planning, funding, and constructing new and updated parks and recreational facilities
- Adopt local park development, enhancement, and maintenance levies
- Plan for and provide public transportation, sidewalks, and trail systems that enhance access to recreational facilities
- Identify open space and recreation needs within communities of color and low-income communities to design appropriate and affordable parks and recreation programs. Consider scholarships and collaborate with health professionals to prescribe Park Rx to foster the use of parks and recreation services among the underserved
- Plan for accommodating changes to park uses as demographics shift over time
- Coordinate open space protections and trail construction with anti-displacement strategies
- Investigate alternative transportation modes to access regional park resources, and support specialized transit options to access recreational opportunities

## **Environmental Health**

The environmental health analysis of impacts considers potential redevelopment of contaminated sites, physical activity, access to open space, and noise and air quality impacts. As described in Sections 2.11.2 and 5.4.6, environmental health inequities exist, and health outcomes vary by place, race, and income. Based on locations of people of color and people with low incomes, these populations may experience localized air quality and noise impacts from proximity to transportation infrastructure. At a regional level, there are no discernable environmental health differences between alternatives on the equity geographies. Increased access to transit, denser and more walkable communities, and increased access to parks and open space could provide increased benefits to the equity geographies if mitigation measures are successfully implemented to prevent displacement of these vulnerable populations. Mitigation measures specific to environmental health, air quality, and noise are applicable and are listed in Tables 4.4-2, 4.9-1, and 4.14-1. One example is monitoring health outcomes and identifying and addressing health disparities.

## **Historic, Cultural, and Archaeological Resources**

For all alternatives, development could alter landscapes and properties with archaeological, cultural, or historic resources. Archaeological and traditional cultural properties in the region are primarily associated with local tribes. Growth can also lead to gentrification and displacement, resulting in loss of cultural resources for communities of color and low-income communities. See the displacement section for a more specific analysis of displacement risk. Measures to mitigate impacts to historic, cultural, and archaeological resources are listed in Table 4.11-1.

## **Climate Change**

As discussed in the VISION 2040 FEIS, the effect of climate change is complex and interrelated. Climate change is of growing urgency, and intersects with many resources including air quality, ecosystems, and water.

For all alternatives, climate impacts or hazards from events such as heat waves, floods, and droughts pose challenges for all communities, as described in Chapter 4. However, communities of color and low-income communities may be more vulnerable and have more exposure to climate change risks and, therefore, have a reduced ability to cope with the impacts of these climate-related events compared to the region as a whole. Communities of color and low-income communities are also at increased risk based on their location (e.g., in floodplains and urban areas). They are also at increased risk based on their livelihoods (e.g., agriculture, fisheries, construction). However, at a regional level, there are no discernable differences between alternatives on the equity geographies. Compared to the region as a whole, communities of color and low-income communities may be disproportionately burdened under any of the alternatives, and local and regional decision-makers should consider mitigation strategies for these large-scale impacts. Climate change mitigation measures are listed in Table 4.4-2.

## Growth in Opportunity Areas

Table 32. Summary of Impacts and Benefits to Equity Geographies and Region: Growth in Opportunity Areas

Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
For the low-income equity geographies, growth in opportunity areas (moderate to very high opportunity) would be lower (50%) under the Preferred Growth Alternative than Transit Focused Growth and more than Stay the Course and Reset Urban Growth. For the people of color equity geographies under the Preferred Growth Alternative, growth in opportunity areas is the same as Transit Focused Growth (63%) and higher than Stay the Course and Reset Urban Growth.	For the equity geographies, growth in opportunity areas would be lower (40% and 54%, respectively) under Stay the Course than the other alternatives.	For the low-income equity geographies, growth in opportunity areas would be higher (55%) under Transit Focused Growth than the other alternatives. For the people of color equity geographies, growth in opportunity areas is the same under the Transit Focused Growth as the Preferred Growth Alternative (63%) and higher than Stay the Course and Reset Urban Growth.	For the equity geographies, growth in opportunity areas would be higher (46% and 62%, respectively) under Reset Urban Growth than Stay the Course and lower than the Preferred Growth Alternative and Transit Focused Growth.

For the equity geographies, growth will occur in areas of opportunity for all of the alternatives which could improve access to opportunity but may elevate growth pressures. Mitigation measures would need to be considered to help prevent displacement of vulnerable populations.

### ***Opportunity Mapping Tool***

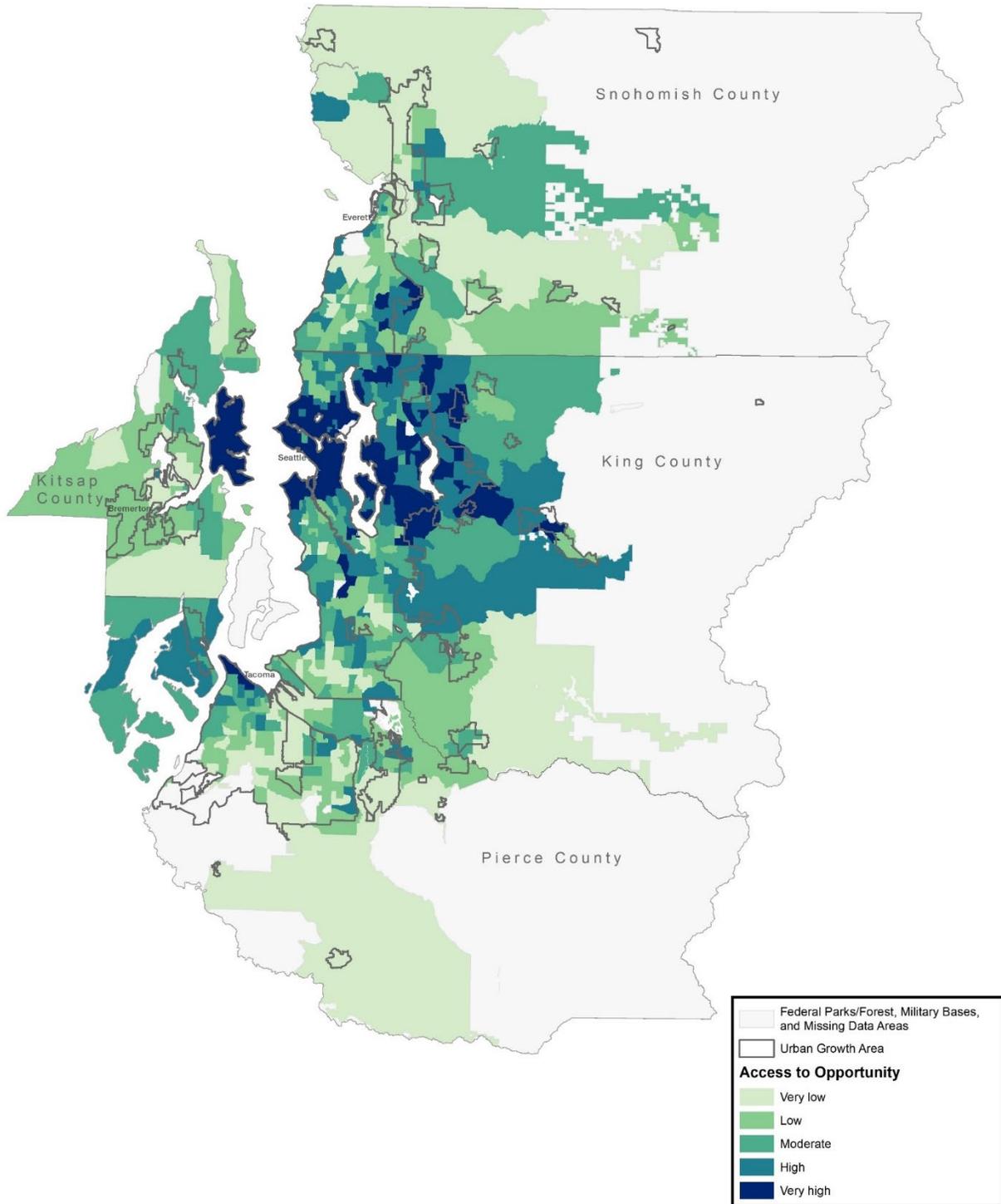
To assess the amount of opportunity that exists in neighborhoods today, PSRC developed the opportunity mapping tool.<sup>23</sup> This tool allows the analysis of growth that may take place in areas with moderate to high opportunity.

Growth in areas of opportunity is based on the “Opportunity Index,” which represents a comprehensive index of five key elements of neighborhood opportunity and positive life outcomes: education, economic health, housing and neighborhood quality, mobility and transportation, and health and environment. The level of opportunity score (very low, low, moderate, high, very high) is determined by sorting all census tracts into quintiles based on their index scores. Opportunity areas for this measure are defined as those areas that score “Moderate to Very High Opportunity”—which represents the top 60 percent of scores among all tracts. Opportunity areas that experience greater proportions of growth may experience an increased risk of displacement.

Additional detail on the opportunity index measures and methodology can be found in Appendix C of the Final SEIS.

<sup>23</sup> PSRC. Opportunity Mapping. <https://www.psrc.org/opportunity-mapping>

Figure 24. Map of Opportunity Index



Source: PSRC

Table 33. Population in Opportunity Areas, Equity Geographies

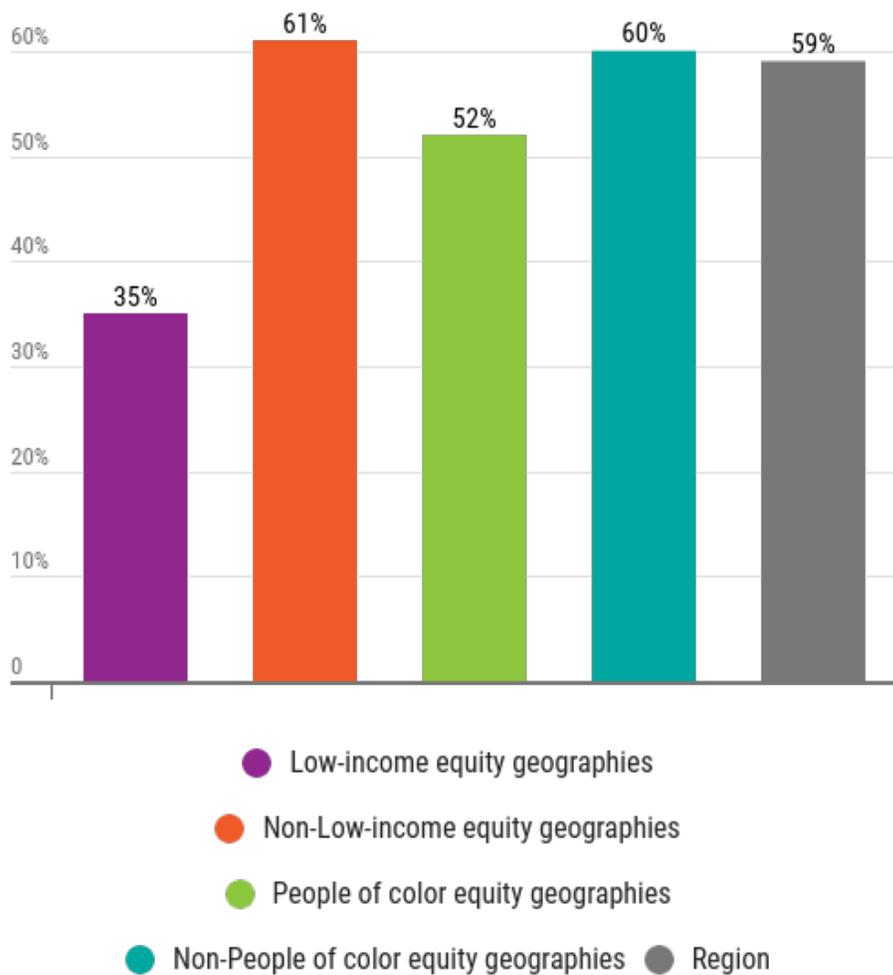
	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	2017	2017-2050	2050	2017-2050	2050	2017-2050	2050	2017-2050	2050
Low-income equity geographies	83,000	86,000	169,000	62,000	145,000	101,000	184,000	61,000	144,000
	35%	50%	41%	40%	36%	55%	43%	46%	38%
Non-Low-income equity geographies	2,317,000	975,000	3,292,000	895,000	3,212,000	969,000	3,286,000	973,000	3,290,000
	61%	61%	61%	56%	59%	62%	61%	60%	60%
People of color equity geographies	365,000	215,000	580,000	154,000	518,000	222,000	586,000	194,000	559,000
	52%	63%	56%	54%	53%	63%	56%	62%	55%
Non-People of color equity geographies	2,036,000	846,000	2,881,000	803,000	2,839,000	849,000	2,884,000	840,000	2,876,000
	60%	60%	60%	54%	59%	60%	60%	58%	60%
Region	2,400,000	1,063,000	3,463,000	958,000	3,359,000	1,072,000	3,472,000	1,036,000	3,436,000
	59%	60%	59%	54%	58%	61%	60%	59%	59%

Source: PSRC

Note: Opportunity Areas for this measure are defined as those areas that score “Moderate to Very High Opportunity”—which represents the top 60 percent of scores among all tracts.

Figure 24 shows the opportunity index by census tract in the region. Census tracts in dark blue represent areas with very high opportunity and the lightest green are areas with very low opportunity. Opportunity areas, census tracts with moderate to very high opportunity, are found frequently in King County, particularly in Seattle and east and north King County, Bainbridge Island in Kitsap County, Tacoma, and pockets of southern Snohomish County.

Figure 25. Percentage of Population in Opportunity Areas, Equity Geographies, 2017



Source: PSRC

In 2017, 60 percent the region’s residents lived in areas of opportunity. Thirty-five percent of the population in low-income equity geographies were located in areas of opportunity and 52 percent of the population in people of color equity geographies were located in areas of opportunity. These disparities in outcomes compared to the region as a whole indicate the need to improve access to educational, economic, health, housing, and transportation opportunities for both communities of color and communities of people with low incomes. Between 2017 and 2050 the Transit Focused Growth Alternative would have the most growth in the equity geographies that are in opportunity areas compared to the other alternatives. The focused growth in these areas could give more people access to opportunity but could also put more displacement pressures on the existing communities.

Under all of the alternatives, the proportion of residents that live in equity geographies in opportunity areas is higher than in 2017. This higher proportion could improve access to opportunity for these populations but also may indicate higher growth pressures. Mitigation policies would need to be considered to help prevent displacement of vulnerable populations.

## Growth in Areas of Higher Displacement Risk

Table 34. Summary of Impacts and Benefits to Equity Geographies and Region: Growth in Areas of Higher Displacement Risk

Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
<p>For low-income equity geographies, growth in areas of higher displacement risk is the same under the Preferred Growth Alternative as Transit Focused Growth (92%) and more than Stay the Course and Reset Urban Growth. For people of color equity geographies, growth in areas of higher displacement risk under the Preferred Growth Alternative would be more than the other alternatives (60%).</p> <p>For growth in the region as a whole under the Preferred Growth Alternative, 22 percent of population growth would occur in areas of higher displacement risk, pointing to an elevated displacement risk compared</p>	<p>For the equity geographies, growth in areas of higher displacement risk would be the lowest of all the alternatives (90% and 53%, respectively) under Stay the Course. It would be much higher in these geographies than the region as a whole, indicating that mitigation would be needed to help prevent displacement.</p> <p>For growth in the region as a whole under Stay the Course, 17 percent of population growth would occur in areas of higher displacement risk.</p>	<p>For low-income equity geographies, growth in areas of higher displacement risk under Transit Focused Growth is the same as the Preferred Growth Alternative (92%) and more than Stay the Course and Reset Urban Growth. For people of color equity geographies, growth in areas of higher displacement risk would be lower (59%) under Transit Focused Growth than the Preferred Growth Alternative and more than Stay the Course and Reset Urban Growth. It would be much higher in these geographies than the region as a whole, indicating that mitigation</p>	<p>For low-income equity geographies, growth in areas of higher displacement risk under Reset Urban Growth is more (91%) than Stay the Course and lower than the Preferred Growth Alternative and Transit Focused Growth. For people of color equity geographies, growth in areas of higher displacement risk under Reset Growth would be more (55%) than Stay the Course and lower than the Preferred Growth Alternative and Transit Focused Growth. It would be much higher in these geographies than the region as a whole, indicating that mitigation would be needed to help prevent displacement.</p>

**Table 34. Summary of Impacts and Benefits to Equity Geographies and Region: Growth in Areas at Higher Displacement Risk (continued)**

Preferred Growth	Stay the Course	Transit Focused Growth	Reset Urban Growth
to Stay the Course and Reset Urban Growth.		would be needed to help prevent displacement. For growth in the region as a whole, 23 percent of population growth would occur in areas of higher displacement risk, also pointing to an elevated displacement risk compared to Stay the Course and Reset Urban Growth.	For growth in the region as a whole under Reset Urban Growth, 17 percent of population growth would occur in areas of higher displacement risk.

Displacement occurs when housing or neighborhood conditions force residents to move. Displacement can be physical, when building conditions deteriorate or redevelopment occurs, or economic, as costs rise.

Gentrification is the influx of capital and higher-income, more highly educated residents into lower-income neighborhoods. People with low incomes, people of color, and neighborhoods where households are predominantly renters are at a higher risk of displacement and gentrification.

Depending on the local and regional context, displacement may precede gentrification or the two may occur simultaneously. Several key factors drive gentrification and displacement: proximity to attractive features such as rail/transit stations and job centers, historic housing stock, and location in a strong real estate market.<sup>24</sup>

Gentrification and displacement are regional issues, as they are inherently linked to shifts in the regional housing and job market. Changes in neighborhood characteristics can help identify areas where displacement may be occurring. Areas with documented displacement include the Central District in Seattle and the Hilltop neighborhood in Tacoma. Both neighborhoods saw an increase in White residents and median household income, indicating a change in the demographics of the residents who can afford to live in these neighborhoods.<sup>25</sup>

<sup>24</sup> PSRC. 2018. VISION 2050 Housing Background Paper. Puget Sound Regional Council. Seattle, WA. June 2018.

<sup>25</sup> Ibid.

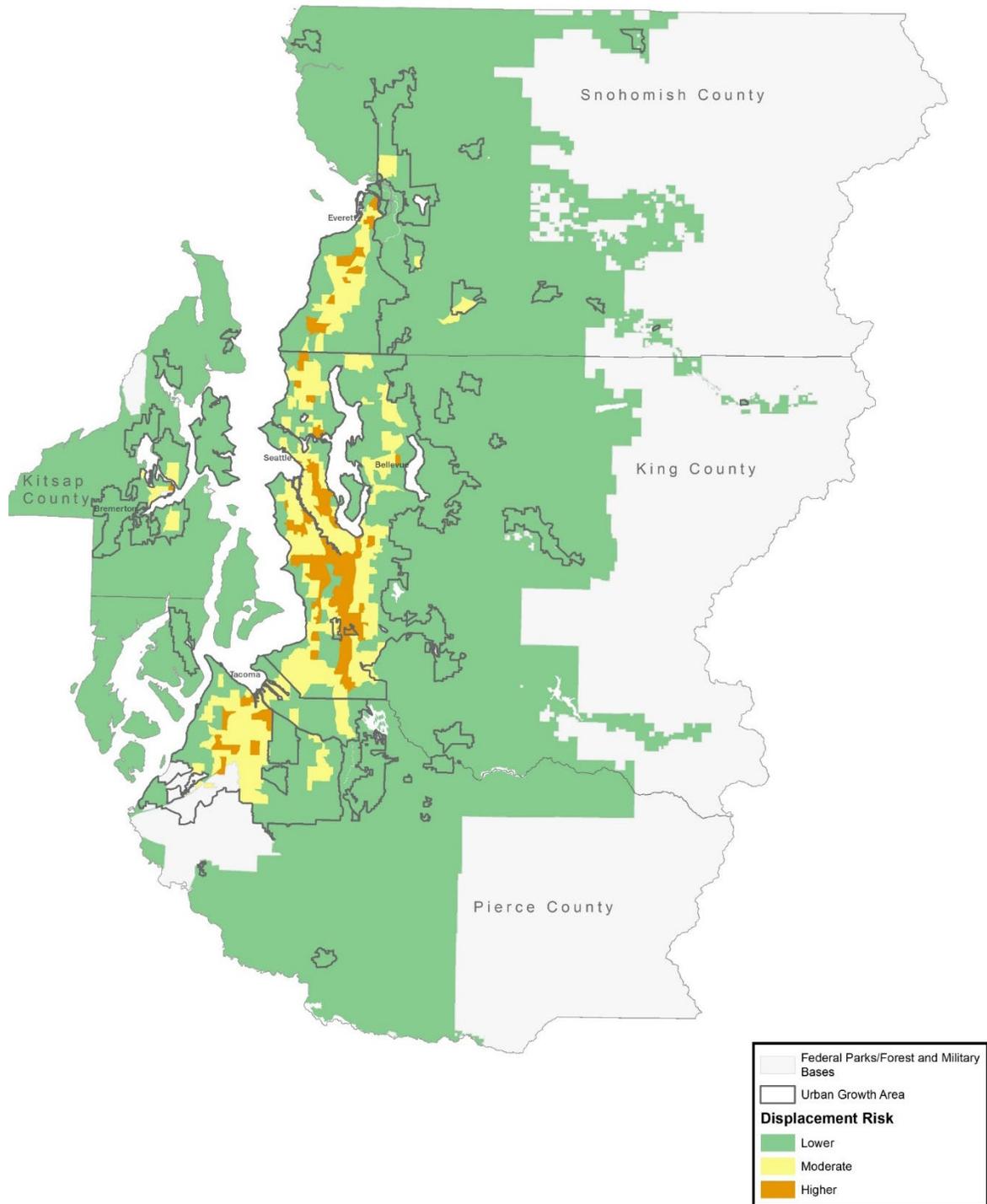
***Displacement Risk Analysis Tool***

The addition of 1.8 million people to the region may put pressure on existing communities leading to displacement. The displacement risk tool was developed to identify areas at greater risk of displacement based on current neighborhood conditions.

Displacement Risk is a composite of indicators representing five elements of neighborhood displacement risks: socio-demographics, transportation qualities, neighborhood characteristics, housing, and civic engagement. The data from these five displacement indicators were compiled into a comprehensive index of displacement risk for all census tracts in the region. "Areas of Higher Displacement Risk" is determined by sorting all census tracts based on their index scores and represents the top 10 percent of scores among all tracts. Figure 26 shows the areas of higher displacement risk in orange and areas of moderate risk of displacement in yellow. Areas at higher risk of displacement are concentrated in the urbanized areas of the region, mainly in south King County, Tacoma, and along the Interstate 5 corridor in Snohomish County.



Figure 26. Map of Displacement Risk



Source: PSRC

Table 35. Population in Areas of Higher Displacement Risk, Equity Geographies

	Base Year	Preferred Growth		Stay the Course		Transit Focused Growth		Reset Urban Growth	
	2017	2017-2050	2050	2017-2050	2050	2017-2050	2050	2017-2050	2050
Low-income equity geographies	168,000	157,000	325,000	138,000	306,000	171,000	339,000	119,000	287,000
	70%	92%	79%	90%	78%	92%	80%	91%	77%
Non-Low-income equity geographies	244,000	222,000	466,000	164,000	408,000	226,000	469,000	185,000	429,000
	6%	14%	9%	10%	8%	14%	9%	11%	8%
People of color equity geographies	275,000	206,000	481,000	150,000	425,000	207,000	482,000	171,000	446,000
	39%	60%	46%	53%	43%	59%	46%	55%	44%
Non-People of color equity geographies	136,000	173,000	310,000	152,000	289,000	190,000	326,000	134,000	270,000
	4%	12%	7%	10%	6%	14%	7%	9%	6%
Region	412,000	381,000	793,000	304,000	715,000	398,000	810,000	306,000	718,000
	10%	22%	14%	17%	12%	23%	14%	17%	12%

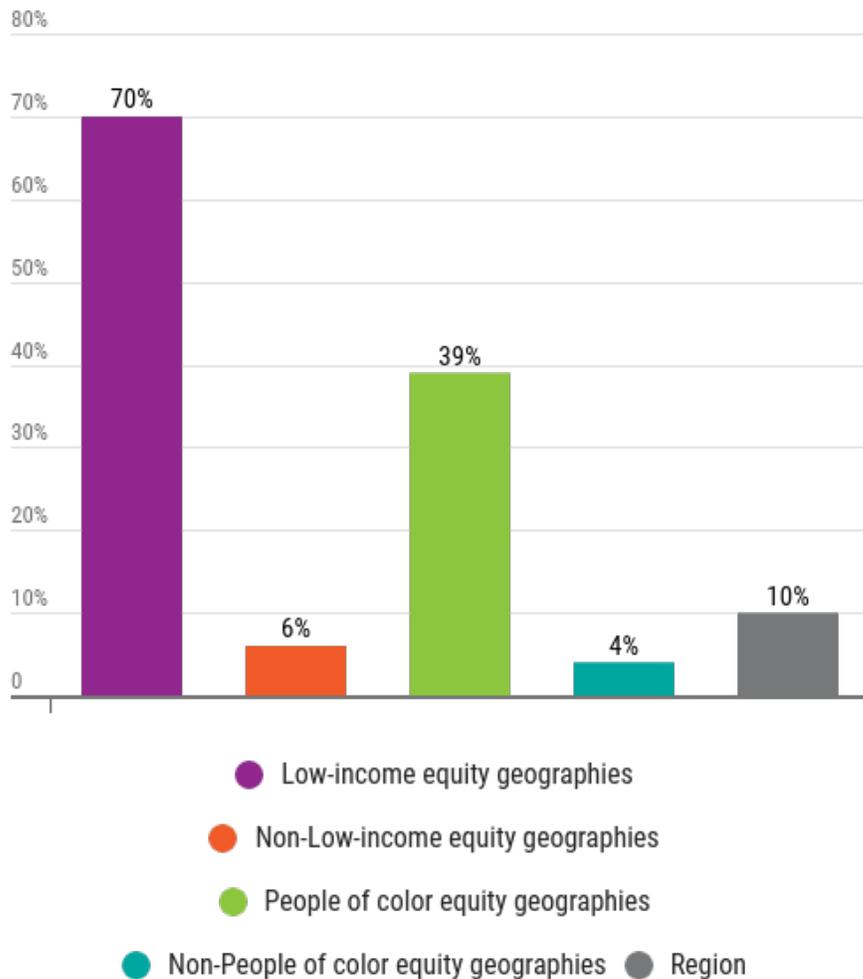
Source: PSRC

Note: Areas of higher displacement risk is defined as the top 10th percentile of census tracts with respect to the displacement risk analysis index.

In 2017, 10 percent of the regional population was located in areas of higher displacement risk, as defined by the displacement risk measure. Seventy percent of the population in low-income equity geographies were in areas of higher displacement risk and 39 percent of the populations in people of color equity geographies were in areas of higher displacement risk in 2017. This evaluation shows that the equity geographies are at substantially greater risk of displacement than the region as a whole.

When looking at this measure for the region as a whole, Transit Focused Growth (23 percent) would have the most growth in areas of higher displacement risk followed closely by Preferred Growth (22 percent). Reset Urban Growth and Stay the Course would have the least (both 17 percent).

Figure 27. Percent of Population in Areas of Higher Displacement Risk, Equity Geographies, 2017



Source: PSRC

Under all alternatives, low-income households in affordable urban neighborhoods have the potential to be displaced by higher-income households unless adequate affordable housing opportunities or other supports are provided. Ninety percent or more of all growth in low-income equity geographies would be in areas of higher displacement risk under each of the alternatives.

Growth in areas of higher displacement risk is highest in the Preferred Growth Alternative due to an increased amount of growth in the equity geographies. It is lowest in the Stay the Course Alternative.

Because many of the census tracts evaluated are at higher risk of displacement, growth in these areas may exacerbate the risk existing residents have of being displaced.

However, growth can provide beneficial opportunities, such as greater access to jobs and services, for people of color and people with low incomes who are able to stay in their neighborhoods. Growth also provides the opportunity to expand the supply of housing choices, including affordable housing, where demand is highest – near transit, jobs, education, and services. Transit-oriented development has the potential to reduce the combined household costs of housing and transportation when paired with affordable housing strategies. Due to these benefits, a focus on increasing housing opportunities for these residents and identifying mitigation measures, rather than avoiding growth in these areas, may be warranted.

### ***Potential Mitigation Measures***

Based on the existing conditions of many of the equity geographies, mitigation would be needed to help prevent displacement of existing communities under all of the alternatives.

Increasing housing supply and retaining current housing, could help to mitigate displacement of existing residents. Potential mitigation measures for providing and maintaining housing were listed previously in Table 19, and additional measures are listed in Table 36. Some of the measures in Table 36 address social equity more generally and are applicable to many elements of the environment.

Table 36. Potential Mitigation Measures: Growth in Areas at Higher Risk of Displacement

Topic: Displacement
<ul style="list-style-type: none"><li>• Incorporate demographic analyses and community involvement with people of color and people with low incomes at the local level and project level*</li><li>• Interview social service providers to verify demographic analyses and understand specific local needs and effective methods for outreach and public involvement*</li><li>• Perform additional and ongoing outreach to involve people of color and people with low incomes*</li><li>• Use demographic analyses and outreach results to prevent new or expanded uses and other public infrastructure from having a disproportionate impact on environmental justice populations*</li><li>• Implement planning and design efforts to improve areas where living conditions and land uses erode good health*</li><li>• Develop programs to maintain and expand the supply of affordable housing*</li><li>• Promote planning processes that account for living-wage jobs within reasonable commute distances</li><li>• Support affordable housing initiatives in proximity to employment centers</li><li>• Promote local programs to develop and support community anchoring activities like job training and small business development programs, job search services, community gardens, food banks and community low income support service centers</li><li>• Provide a supportive environment for business startups, small businesses, and locally owned businesses</li><li>• Promote planning processes and partnerships to create pathways to living wage careers</li><li>• Engage with the Legislature to expand local tools and funding to support affordable housing in transit station areas</li></ul>



## Part 4: Findings and Next Steps

The central Puget Sound region is changing. Trends show that the region is becoming more racially diverse, residents are living longer, and where people live is shifting. People of color make up 35 percent of the region's population—an 81 percent increase from 2000. The region's Hispanic/Latinx population has grown by 130 percent since 2000 and now constitutes 10 percent of the region's population. The region's Asian/Pacific Islander population has grown 88 percent since 2000 and currently represents 13 percent of the region's population.

The people of color equity geographies have a higher share of people with low incomes (40 percent) than other parts of the region (24 percent). These areas also have a much higher share of people with limited English proficiency and households without a vehicle. Black and Hispanic/Latinx households are more likely to be cost-burdened, regardless of housing tenure.

Although people of color are more dispersed throughout the region, the people of color equity geographies are expected to have more overall population growth under all of the alternatives—along the Interstate 5 corridor, southwest and east King County, and northern Pierce County.

Local jurisdictions should continue to work with their residents to understand how shifting demographics and continued growth can change local needs. For example, the City of Seattle has developed the Equitable Development Initiative to determine how neighborhood investments should be made to best support those in need by considering both history and current conditions. The goal is for future positive outcomes to be equitably distributed among Seattle residents and workers.<sup>26</sup>

This type of analysis of investments is important for understanding how planned changes may affect existing and future residents of the region. The mitigation measures highlighted throughout the Final SEIS and the policies and actions in VISION 2050 are crucial steps to ensure that the region's growth between now and 2050 does not adversely affect its residents, especially those with the highest needs.

Alternatives that concentrate growth have the most potential to provide greater opportunities to current residents, but increased growth may also impact communities negatively. These impacts include changing housing affordability, redevelopment pressure on small businesses and community institutions, and displacement pressure.

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<sup>26</sup> City of Seattle. Equitable Development Initiative. Available at: <https://www.seattle.gov/opcd/ongoing-initiatives/equitable-development-initiative>.

The Preferred Growth Alternative is characterized by a compact growth pattern that assumes accelerated growth near the region's existing and planned transit investments, similar to Transit Focused Growth.

The growth pattern in the equity geographies in these alternatives would decrease the amount of time residents spend driving alone and increases transportation options, potentially reducing household transportation costs. The compact development in these alternatives could also decrease the cost of public services, based on the ability to use existing services and decreasing the need for development in areas not previously developed.

The Preferred Growth, Transit Focused Growth, and the Stay the Course alternatives provide the most moderate-density housing in the equity geographies, which is often the most affordable type of market rate housing.

However, concentrated growth in the equity geographies in the Preferred Growth, Transit Focused Growth, and Stay the Course alternatives could decrease affordability for current residents as additional pressure is put on the housing markets of these communities and high-density housing is built to accommodate population growth. The share of the population living in areas with higher risk of displacement in these alternatives is higher than Reset Urban Growth, which has a less compact pattern of development and could decrease the amount of high-density development pressure on these communities.

Alternatives that concentrate growth in areas where more people of color and people with low incomes live could have greater cumulative impacts if adequate coordination and mitigation measures are not implemented. Identifying mitigation strategies in the Preferred Growth Alternative can both allow residents of equity geographies to have greater access to opportunity and transportation options, while decreasing their risks of displacement and higher housing costs.

Implementation of appropriate mitigation strategies will be necessary to avoid disproportionately high and adverse effects on people of color and people with low incomes under any of the alternatives. Homelessness and housing affordability are currently matters of high public concern and could worsen unless effective measures are implemented to address them. Local and regional elected officials are considering and implementing a number of measures to increase affordability and production of housing as well as provision of additional services for homeless populations intended to create successful pathways out of homelessness. The Washington State Legislature is currently considering measures that would provide additional local option revenue sources that could be directed to target housing affordability and homelessness in the

region. All of these are consistent with the suite of potential mitigation measures identified in this SEIS. Environmental justice populations may be disproportionately burdened with other elements, such as climate change, under any of the alternatives, and local and regional decision-makers should consider mitigation strategies for these large-scale impacts.

VISION 2050 provides an opportunity to incorporate policies and actions that address the mitigation strategies highlighted throughout this document and the Final SEIS. Policies related to distribution of resources, community engagement, affordable housing, and many more are imperative for ensuring that all residents benefit from the region's growth.

PSRC and local jurisdictions should conduct additional environmental justice and equity analyses as part of future plans, project-level planning, and environmental review, in addition to engaging the public to better understand the needs of the region's residents.

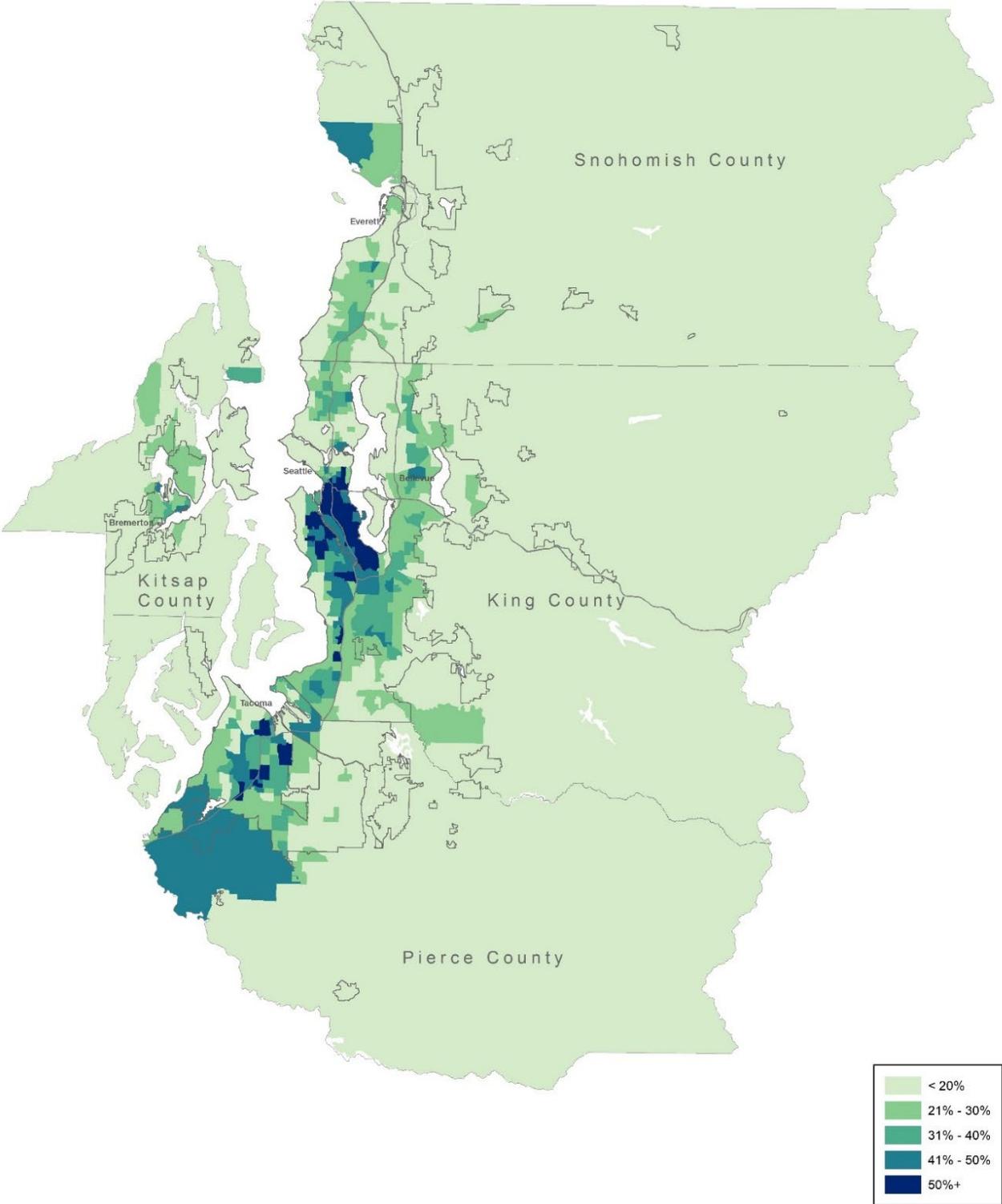


# Part 5: Demographic Maps



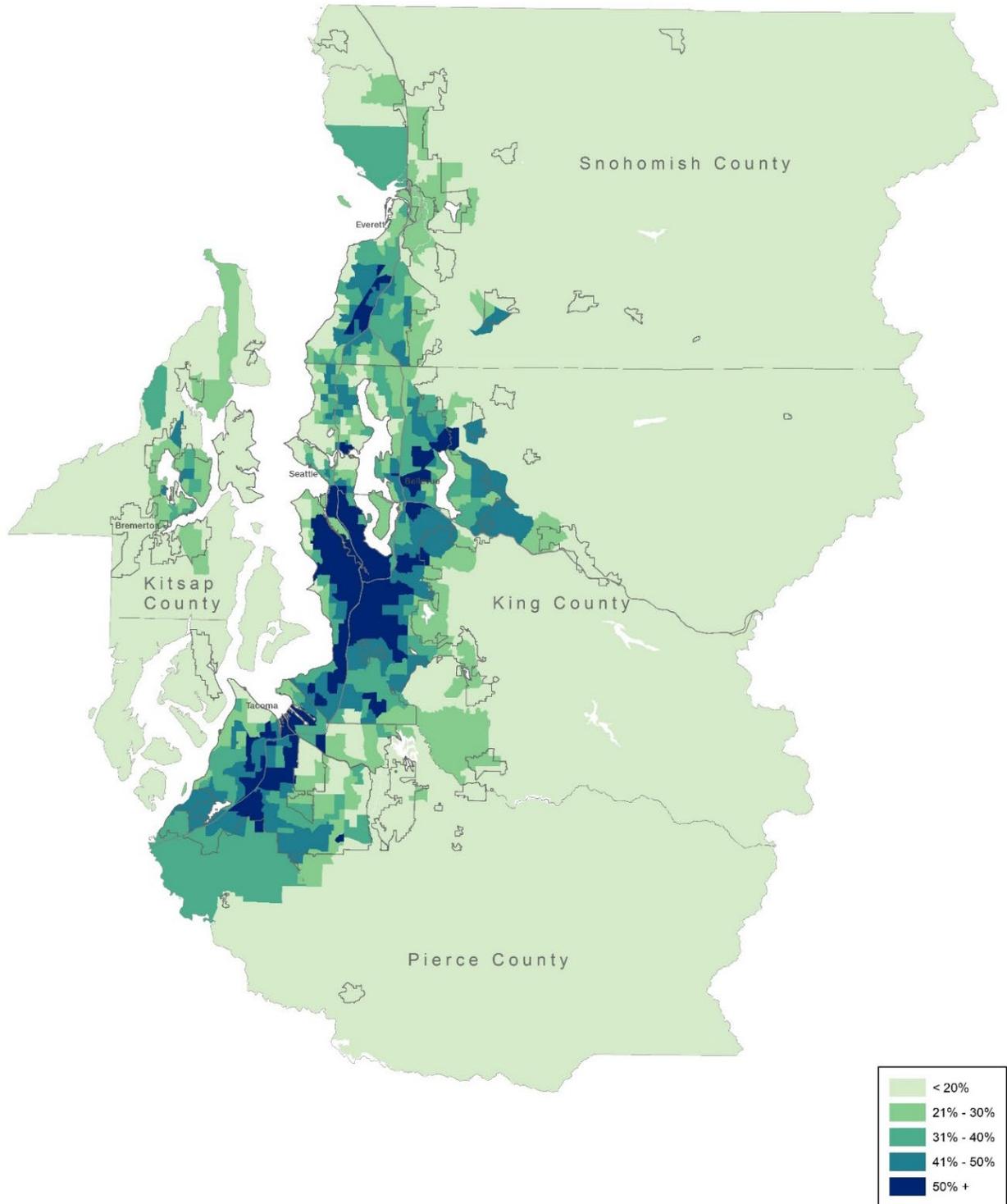
PSRC

Figure 28. People of Color, Central Puget Sound: 2000



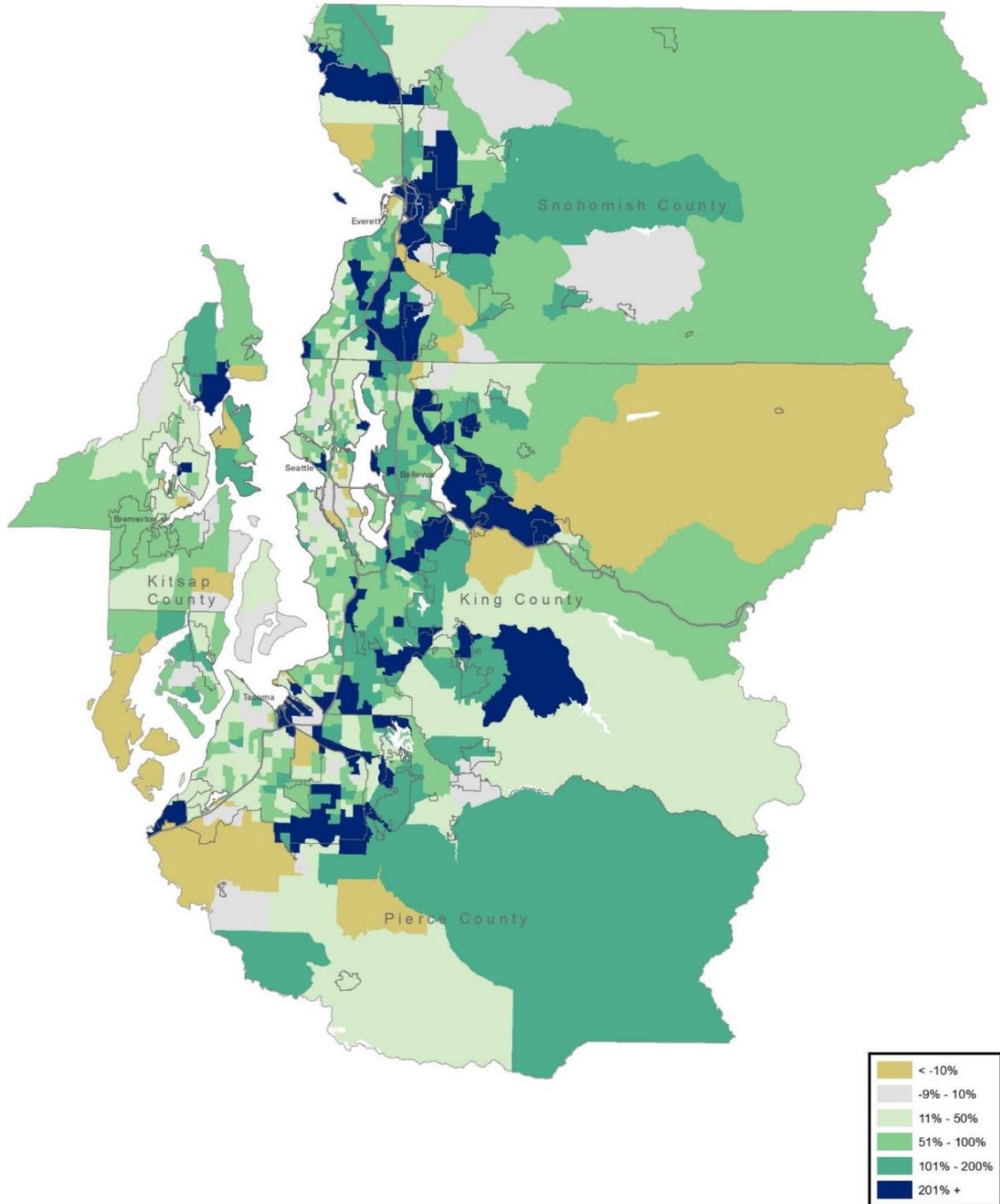
Source: American Community Survey 5-year estimates

Figure 29. People of Color, Central Puget Sound: 2016



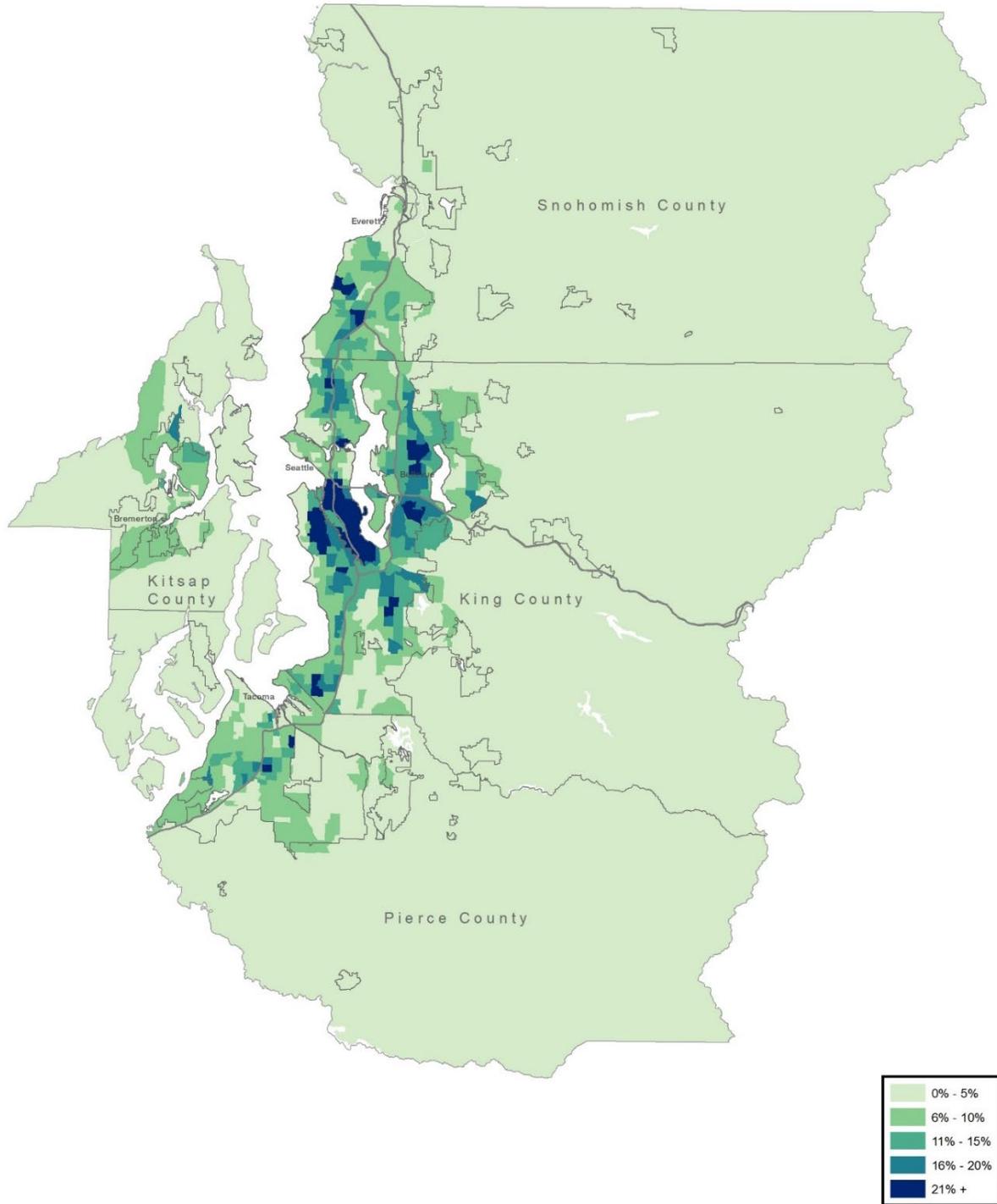
Source: American Community Survey 5-year estimates

Figure 30. Change in People of Color, Central Puget Sound: 2000-2016



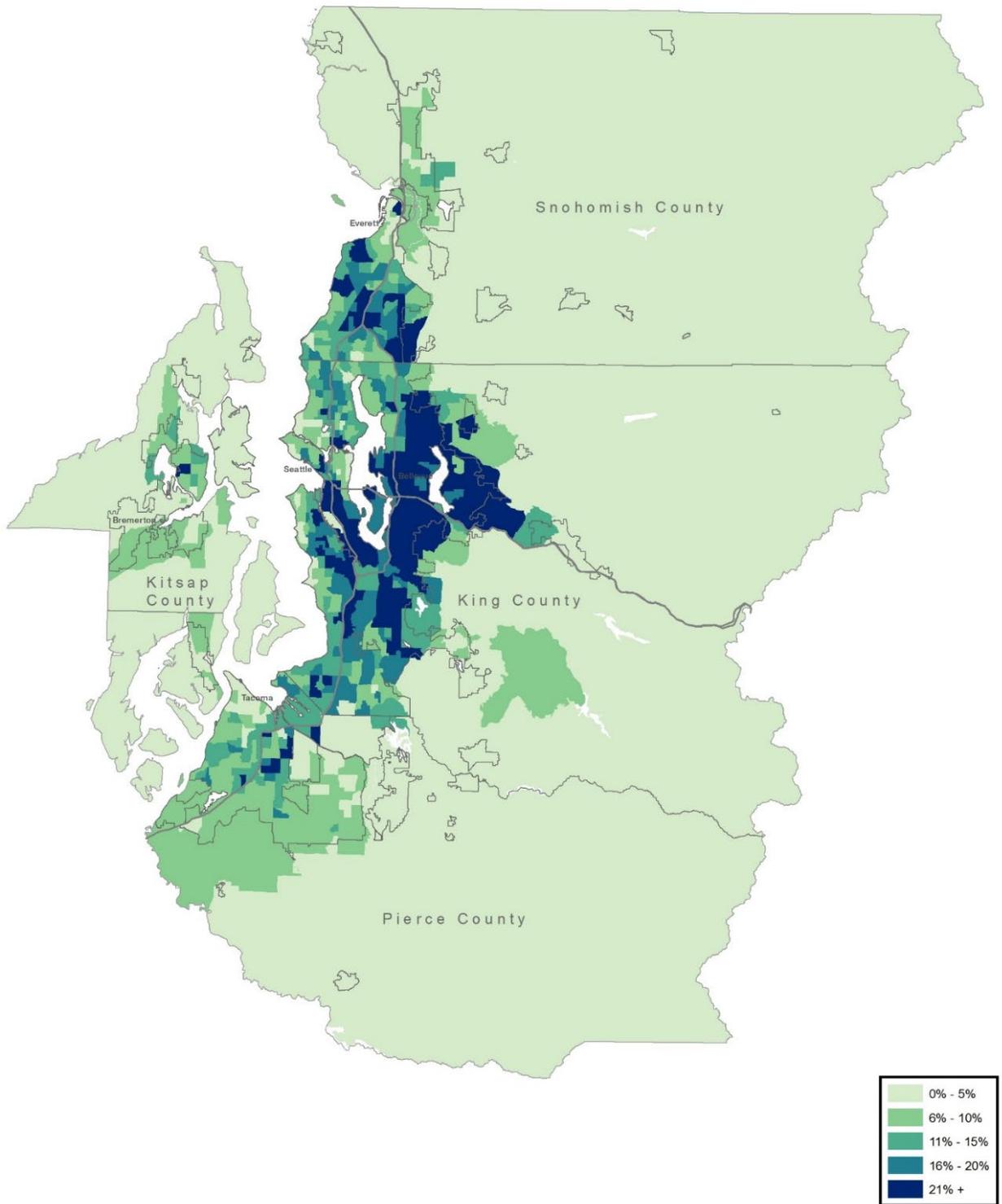
Source: American Community Survey 5-year estimates

Figure 31. Asian/Pacific Islander, Central Puget Sound: 2000



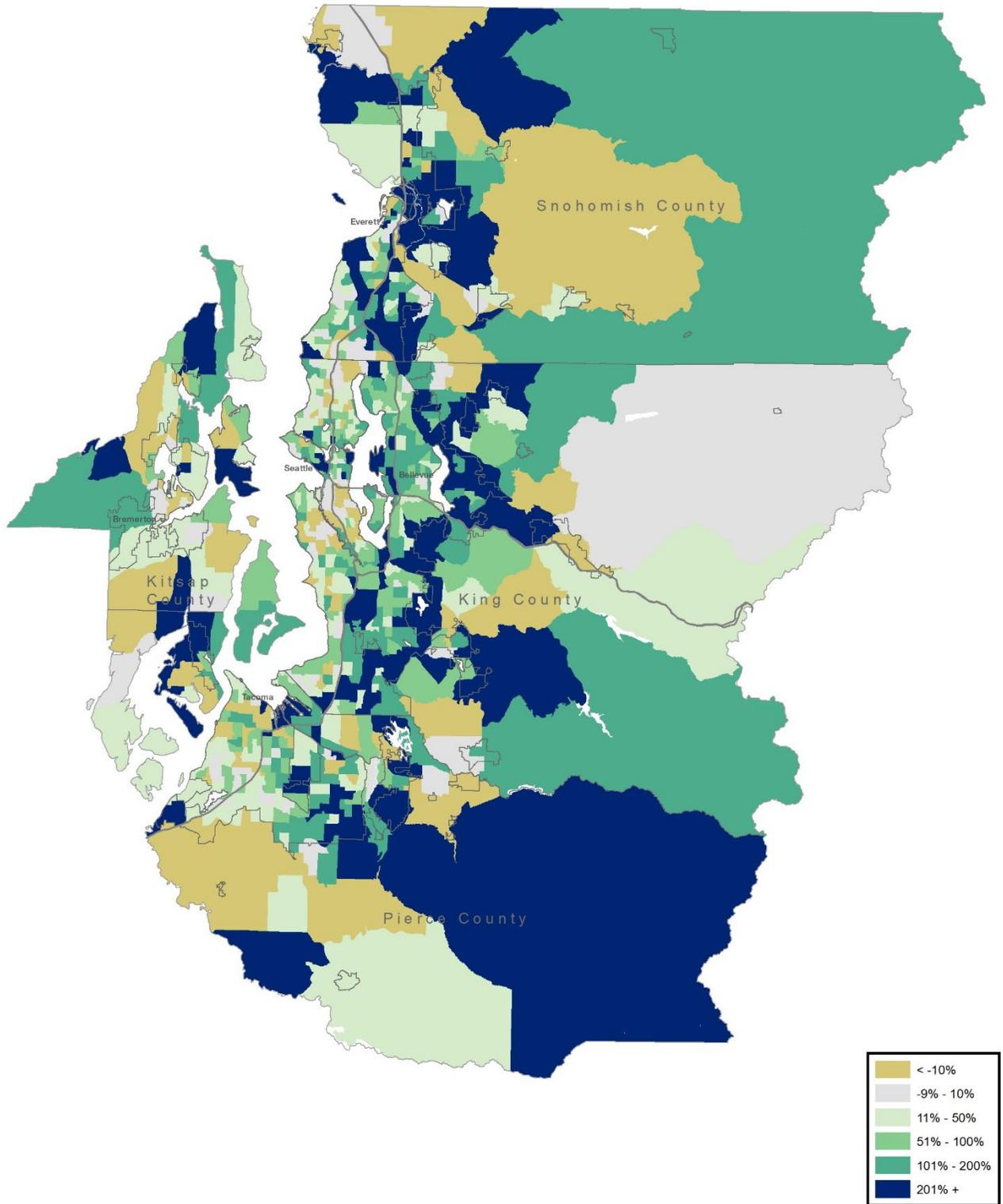
Source: American Community Survey 5-year estimates

Figure 32. Asian/Pacific Islander, Central Puget Sound: 2016



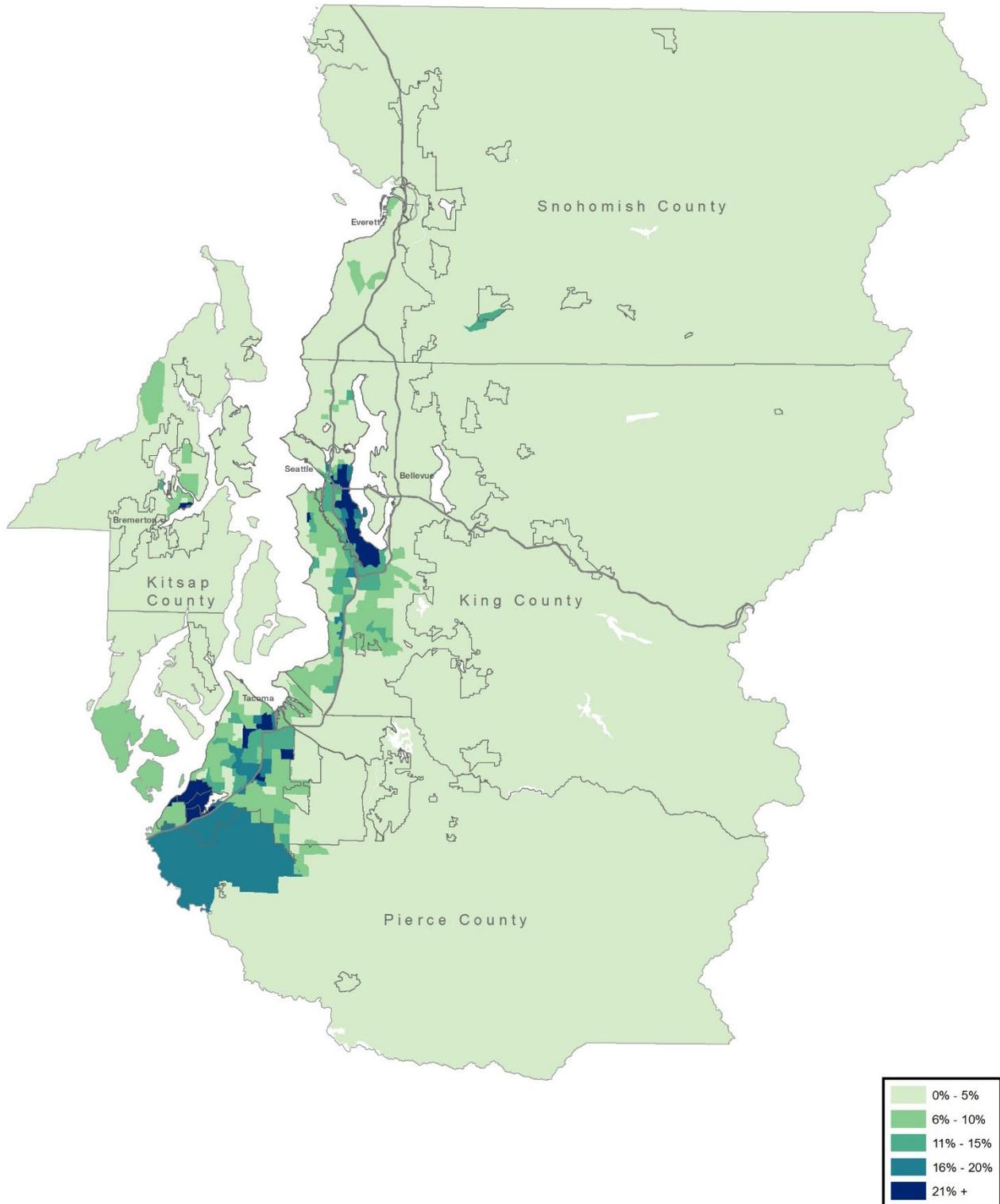
Source: American Community Survey 5-year estimates

Figure 33. Change in Asian/Pacific Islander, Central Puget Sound: 2000-2016



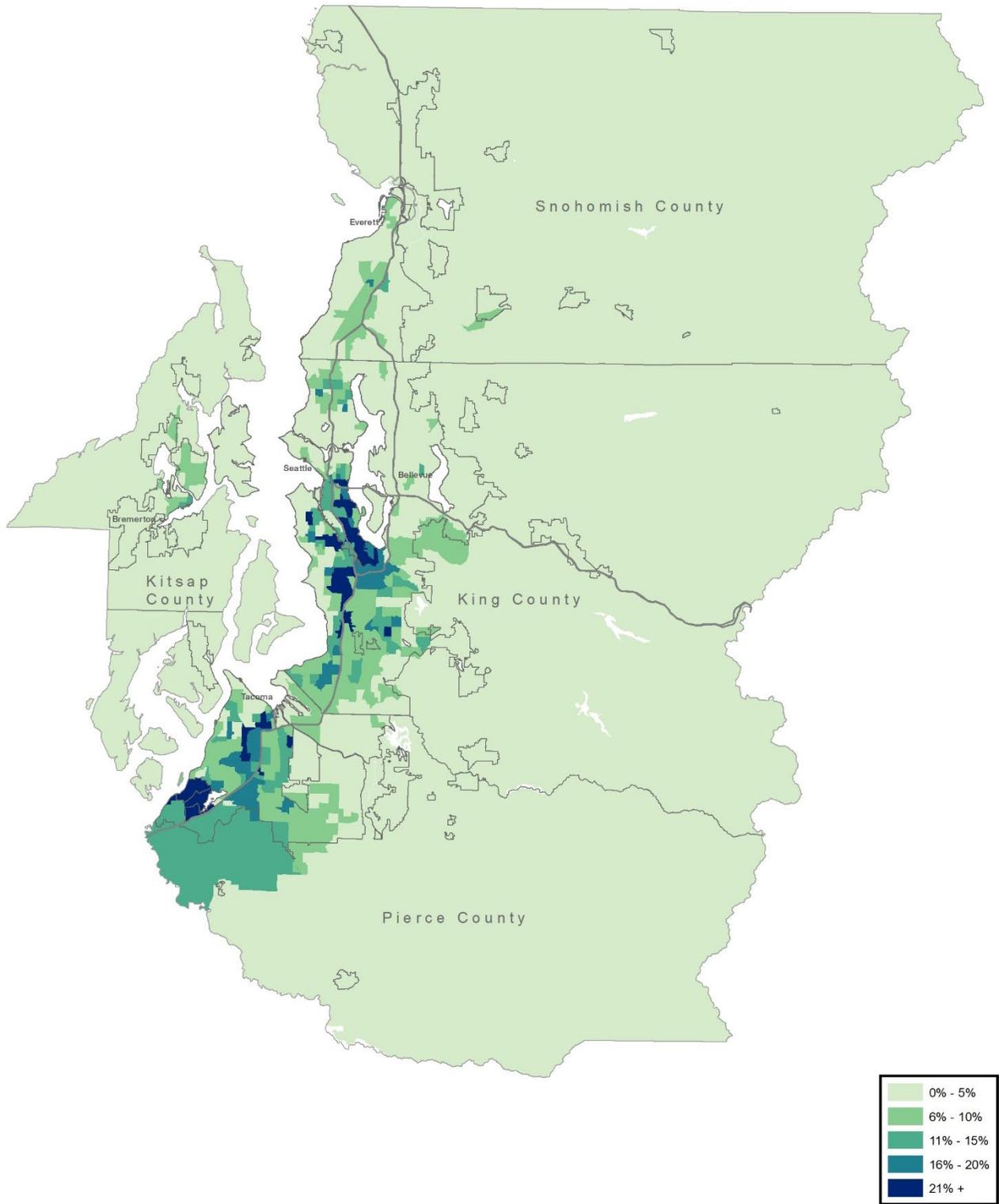
Source: American Community Survey 5-year estimates

Figure 34. Black/African American, Central Puget Sound: 2000



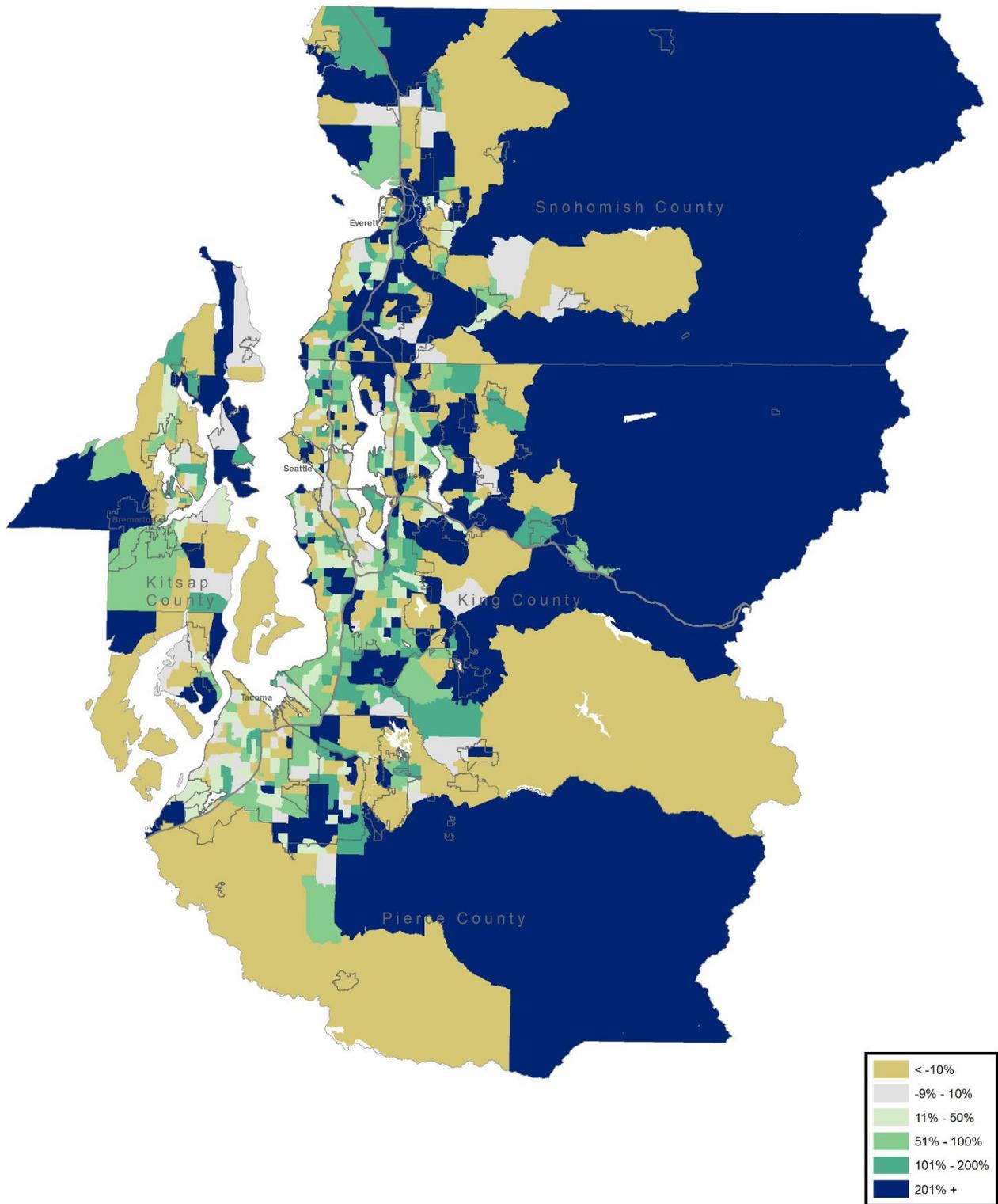
Source: American Community Survey 5-year estimates

Figure 35. Black/African American Population, Central Puget Sound: 2016



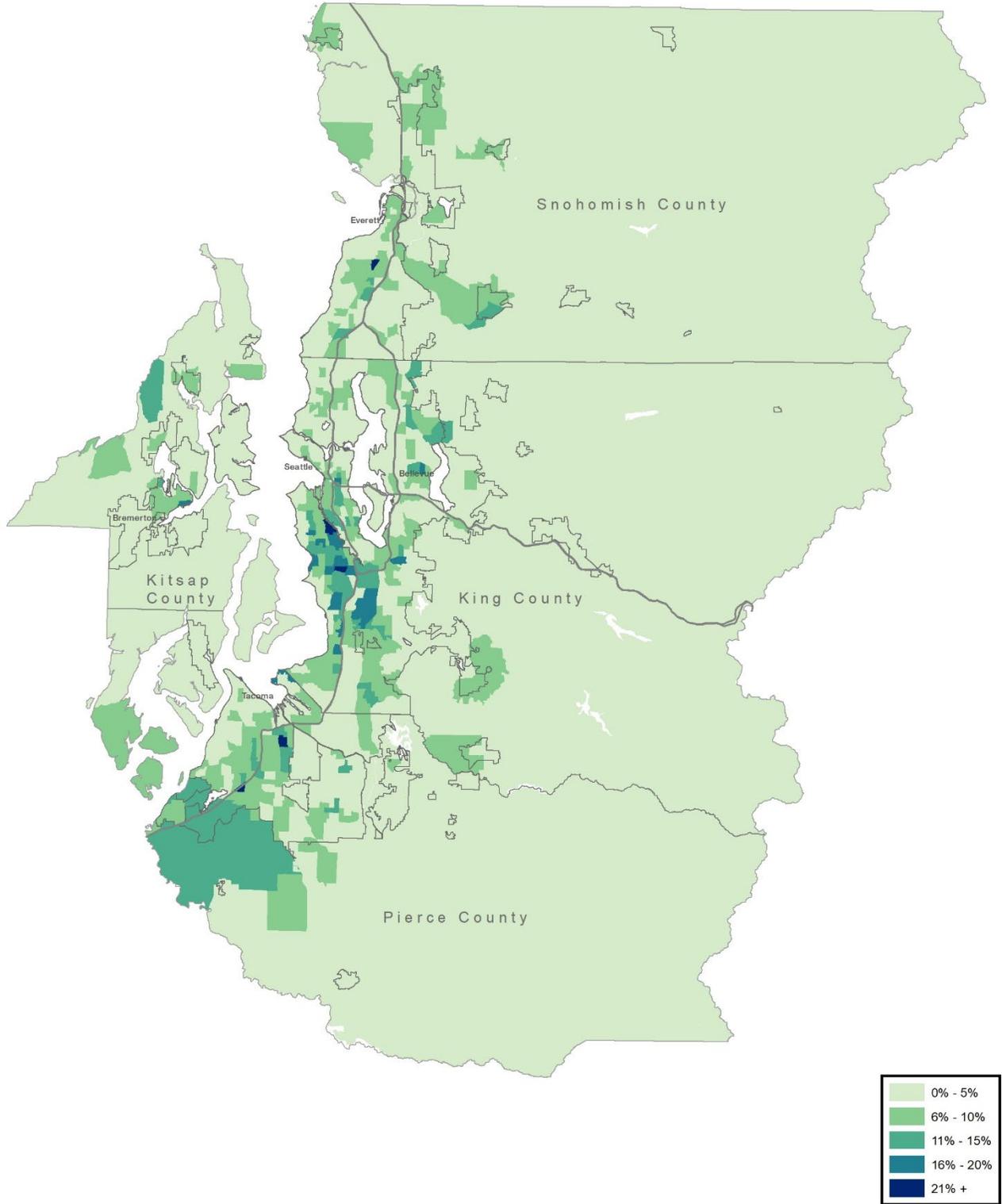
Source: American Community Survey 5-year estimates

Figure 36. Change in Black/African American, Central Puget Sound: 2000-2016



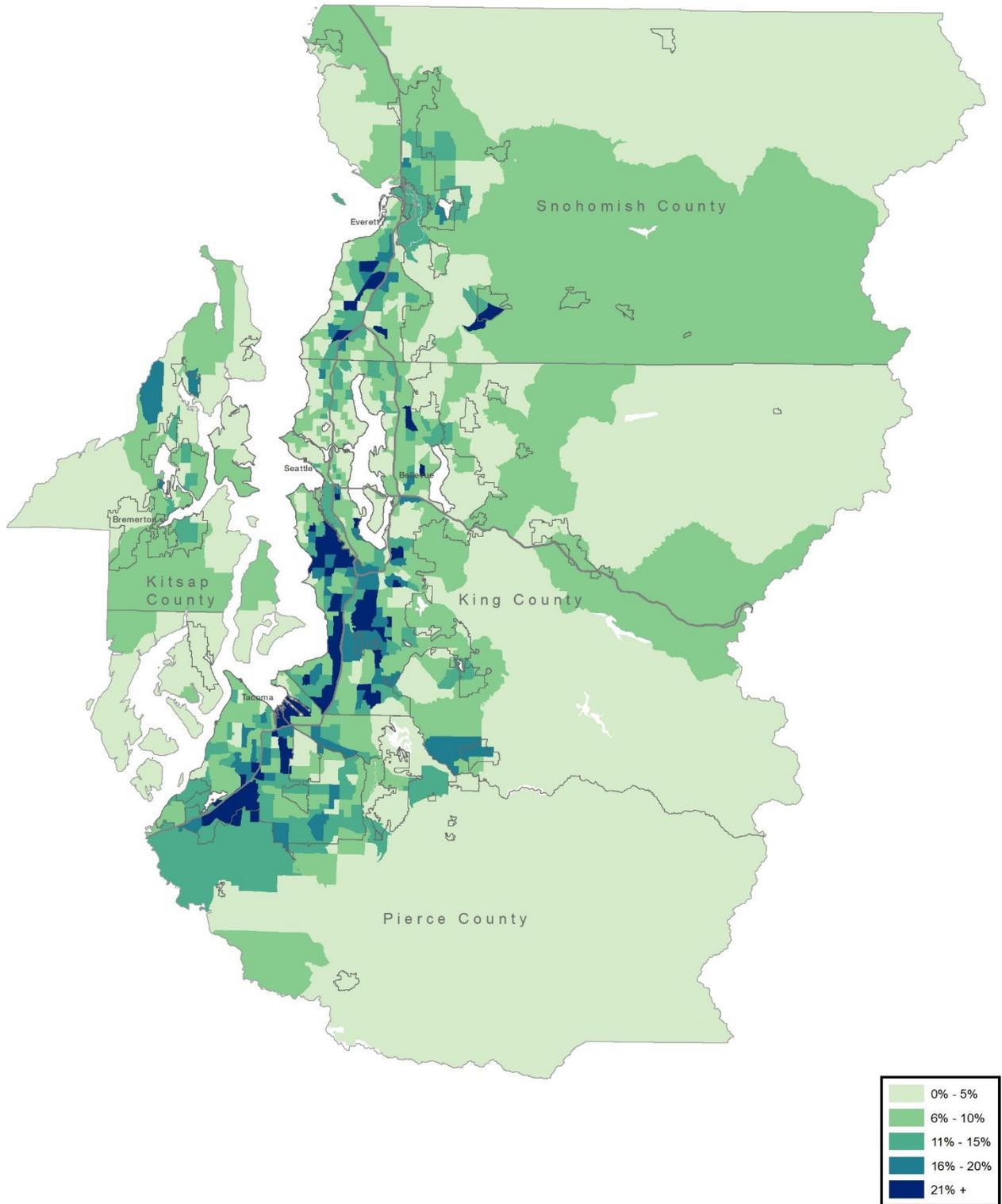
Source: American Community Survey 5-year estimates

Figure 37. Hispanic/Latinx, Central Puget Sound: 2000



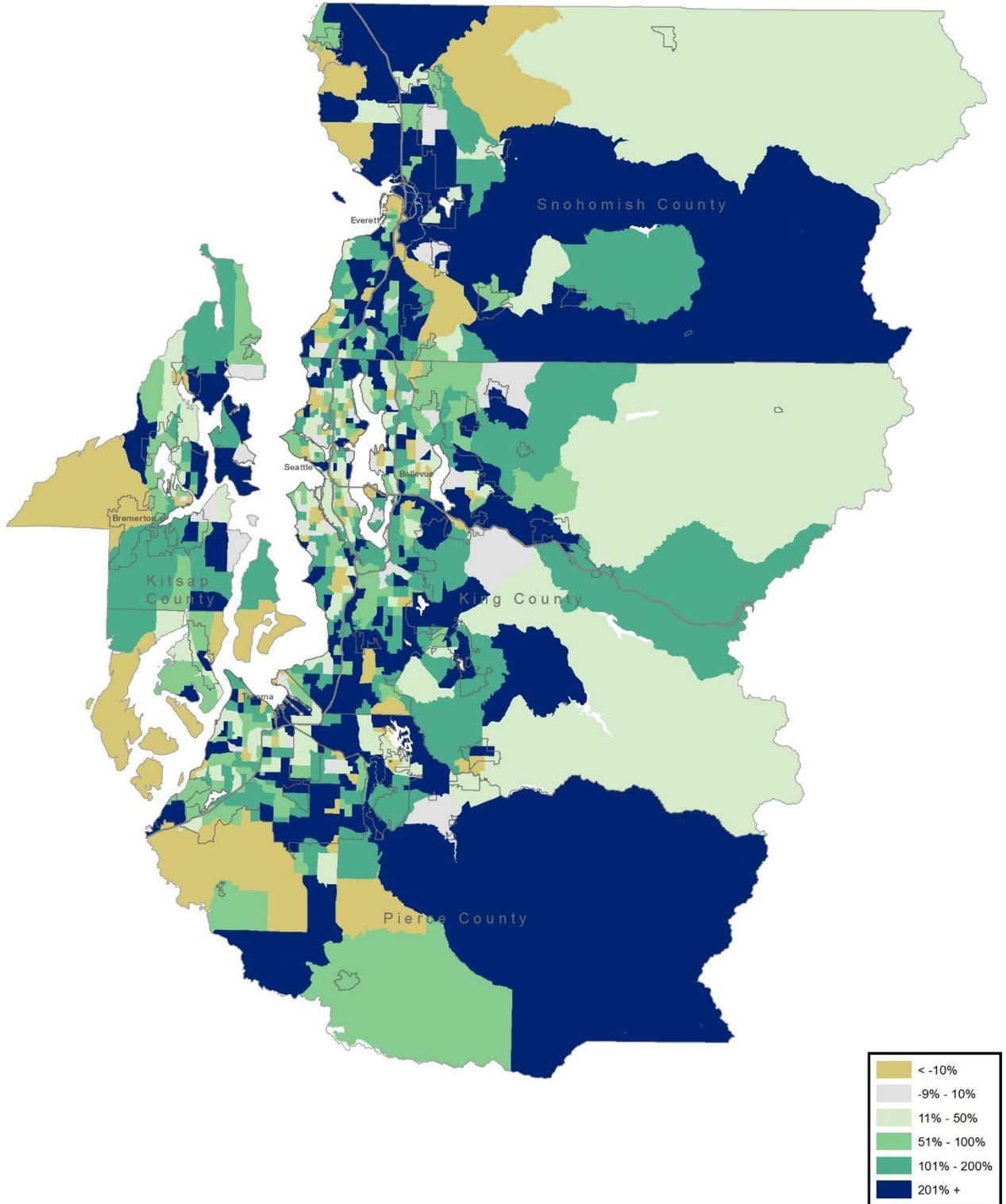
Source: American Community Survey 5-year estimates

Figure 38. Hispanic/Latinx, Central Puget Sound: 2016



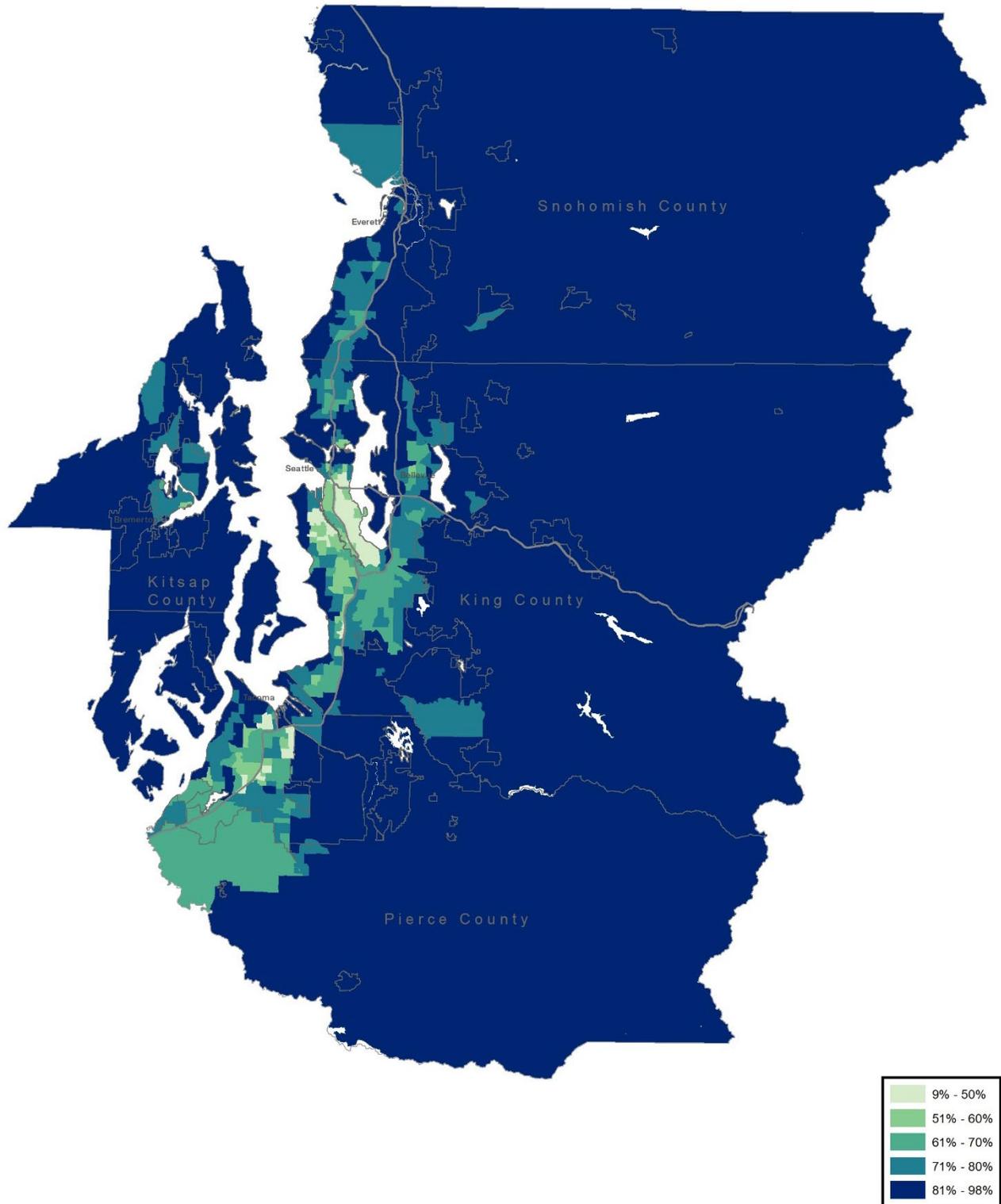
Source: American Community Survey 5-year estimates

Figure 39. Change in Hispanic/Latinx, Central Puget Sound: 2000-2016



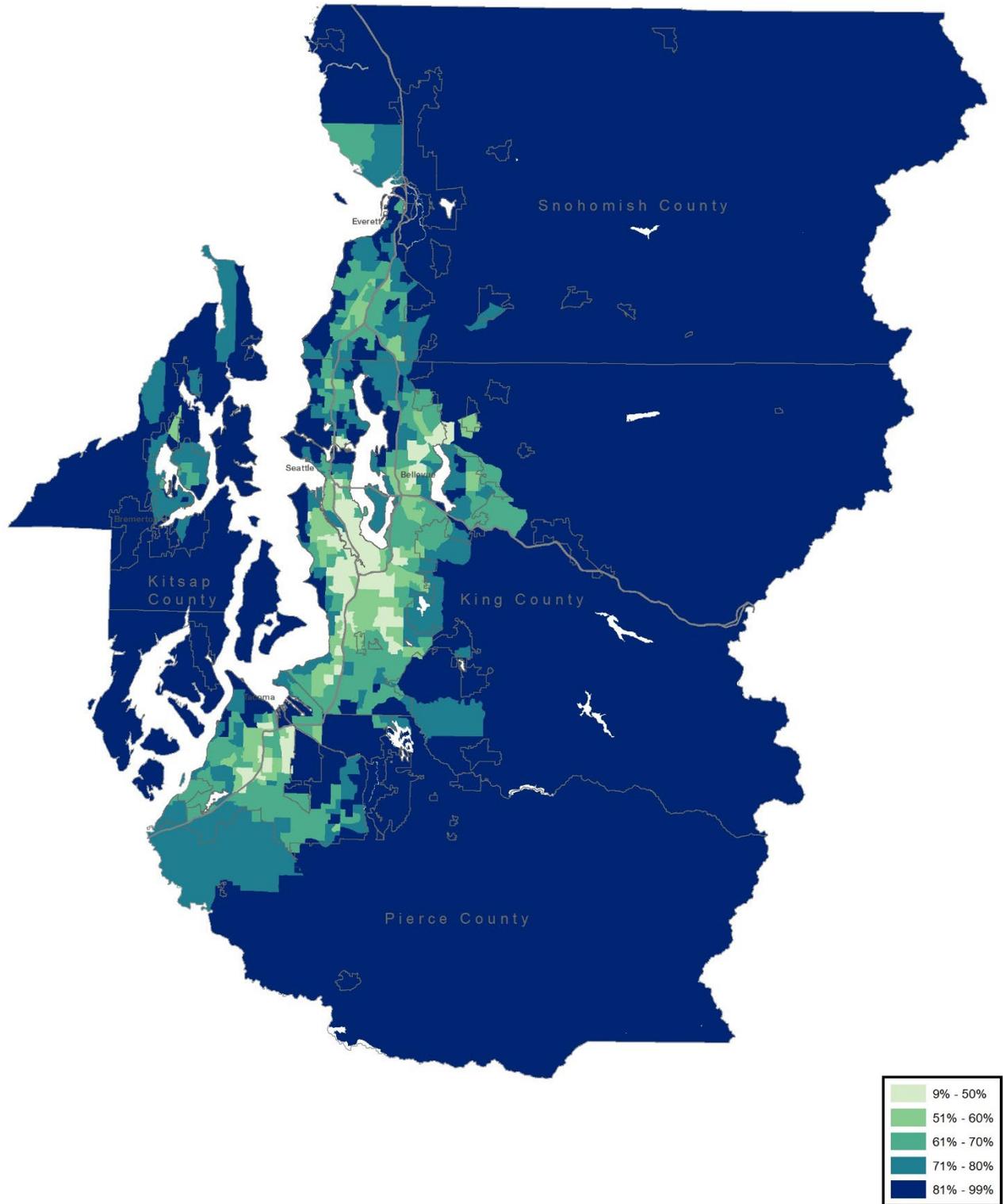
Source: American Community Survey 5-year estimates

Figure 40. White/Caucasian, Central Puget Sound: 2000



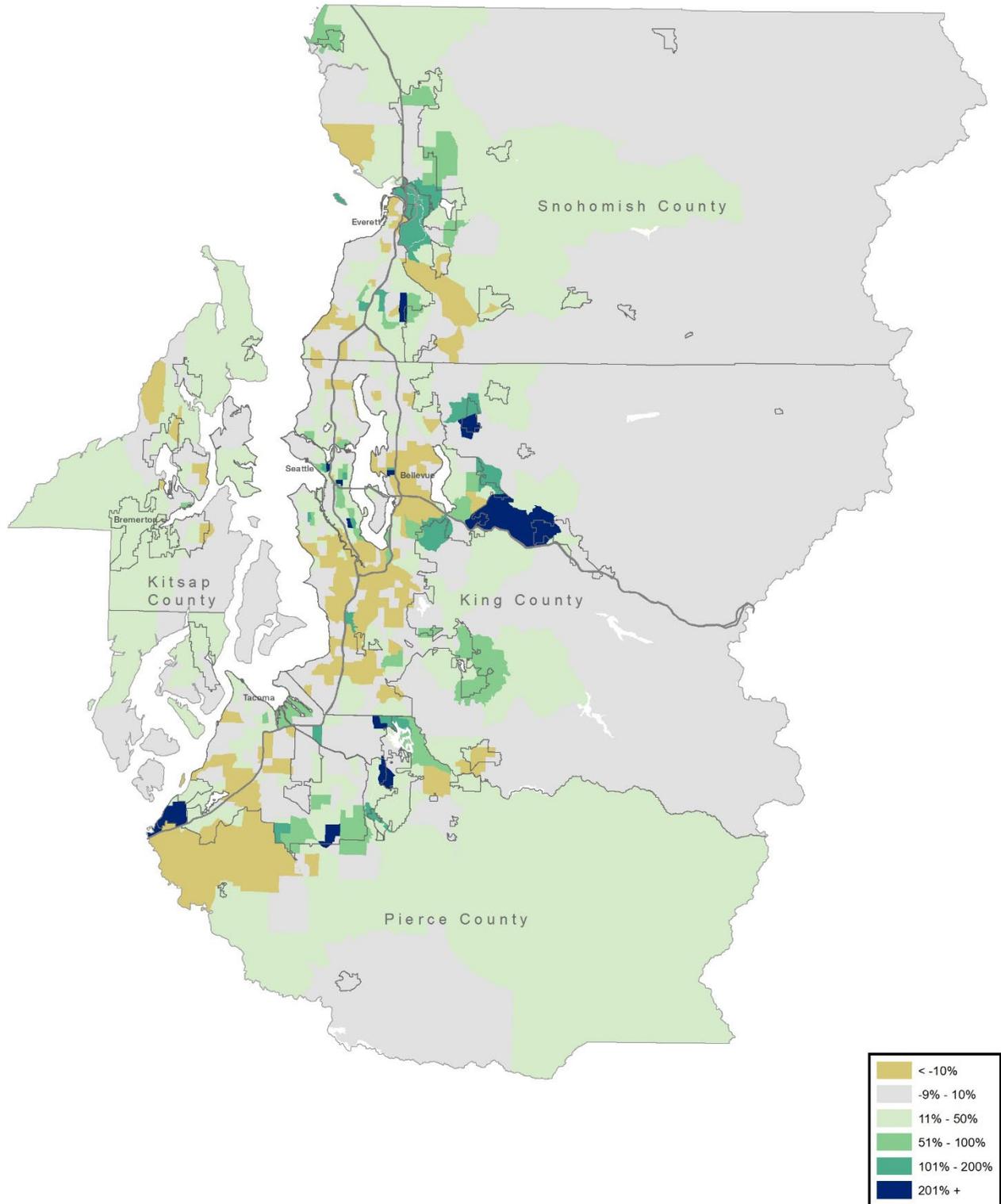
Source: American Community Survey 5-year estimates

Figure 41. White/Caucasian, Central Puget Sound: 2016



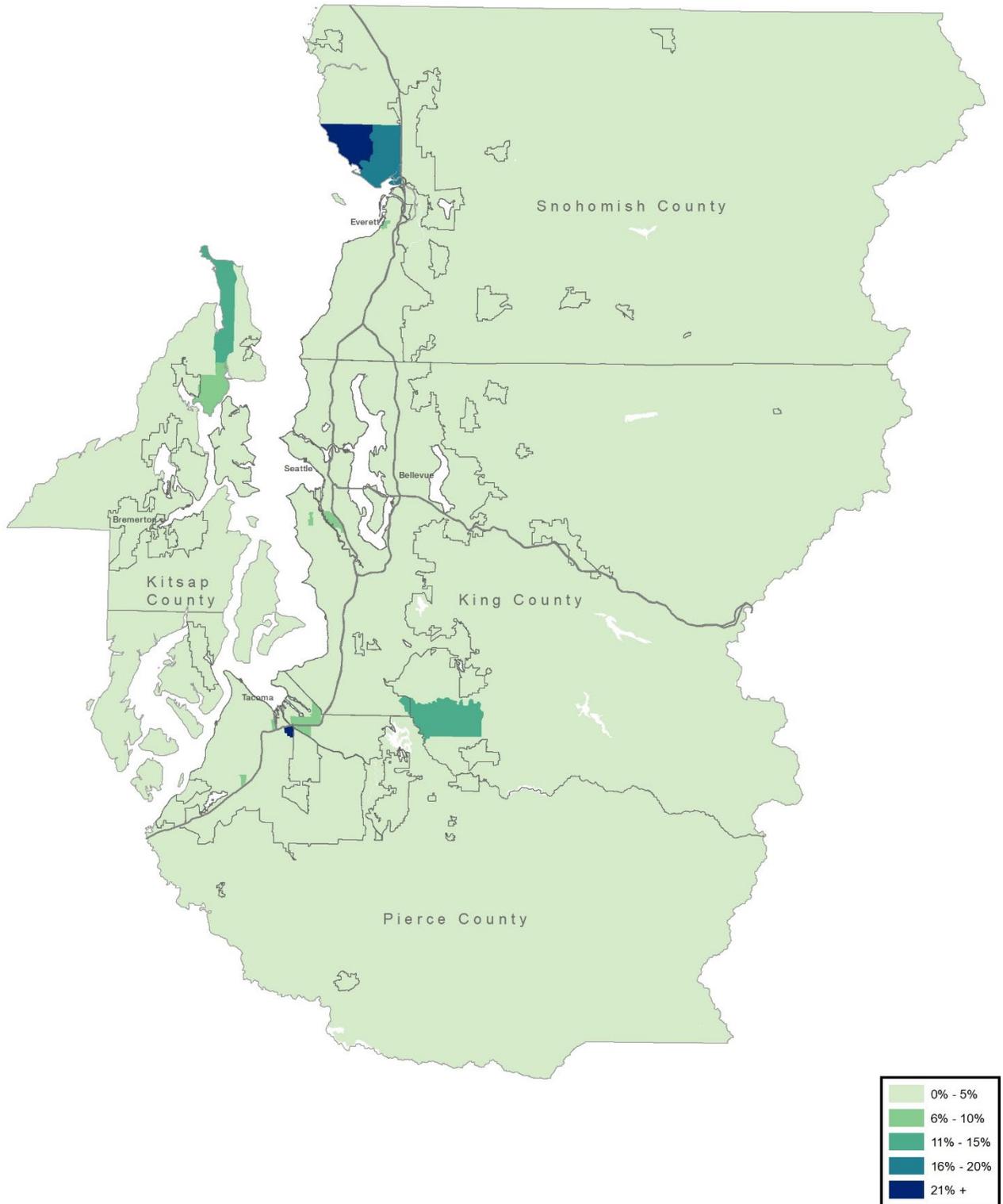
Source: American Community Survey 5-year estimates

Figure 42. Change in White/Caucasian, Central Puget Sound: 2000-2016



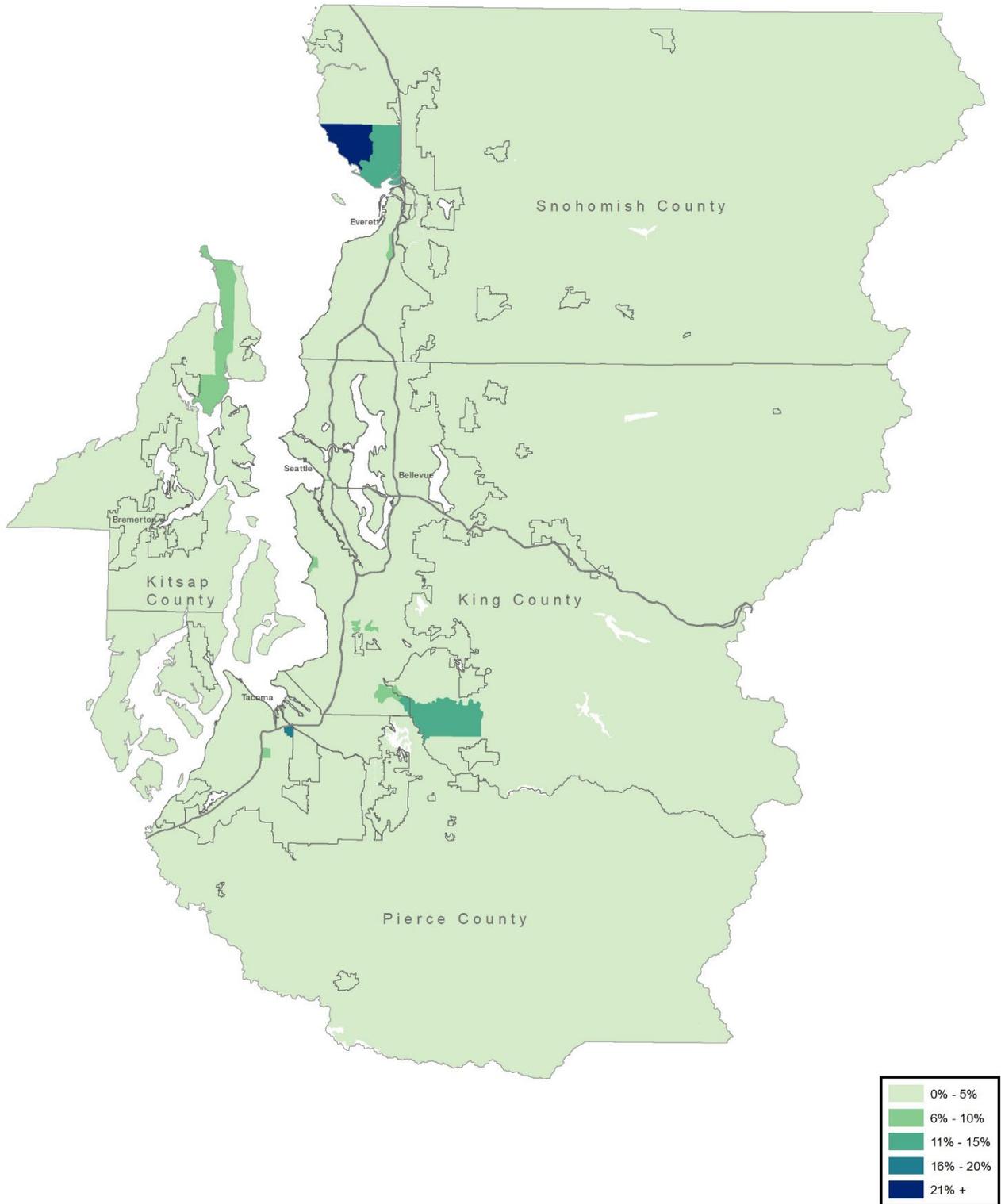
Source: American Community Survey 5-year estimates

Figure 43. American Indian/Alaskan Native, Central Puget Sound: 2000



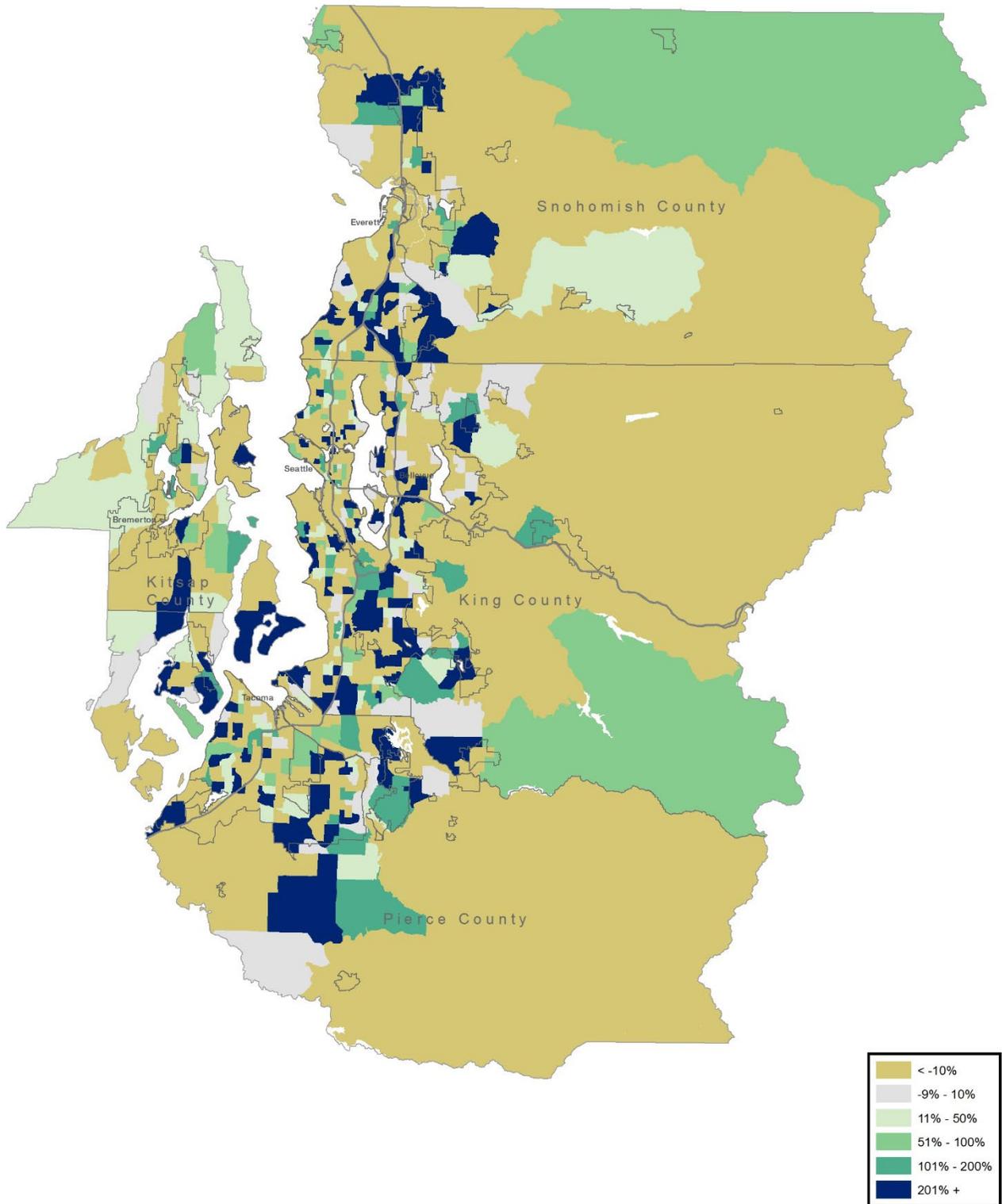
Source: American Community Survey 5-year estimates

Figure 44. American Indian/Alaskan Native, Central Puget Sound: 2016



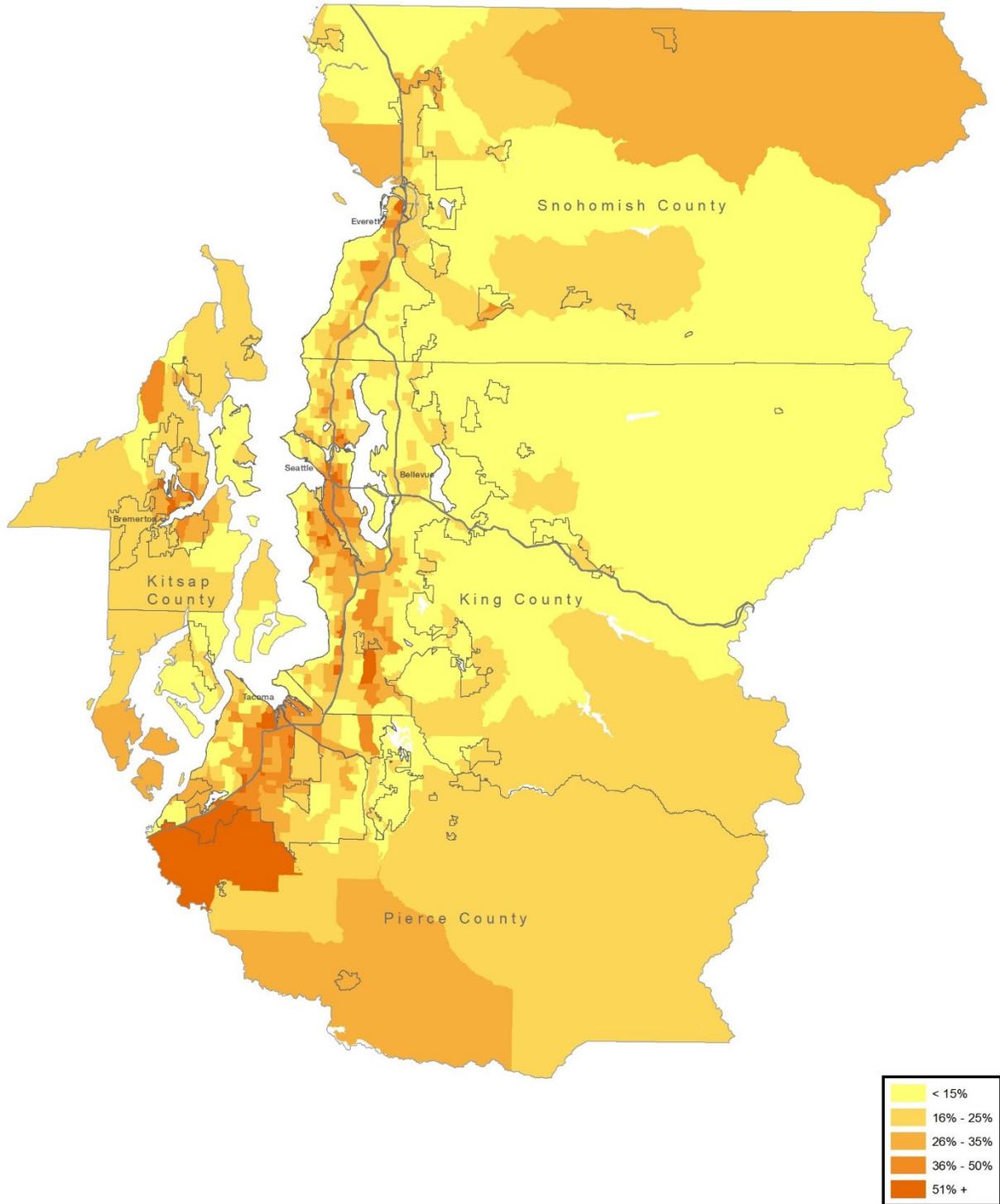
Source: American Community Survey 5-year estimates

Figure 45. Change in American Indian/Alaskan Native, Central Puget Sound: 2000-2016



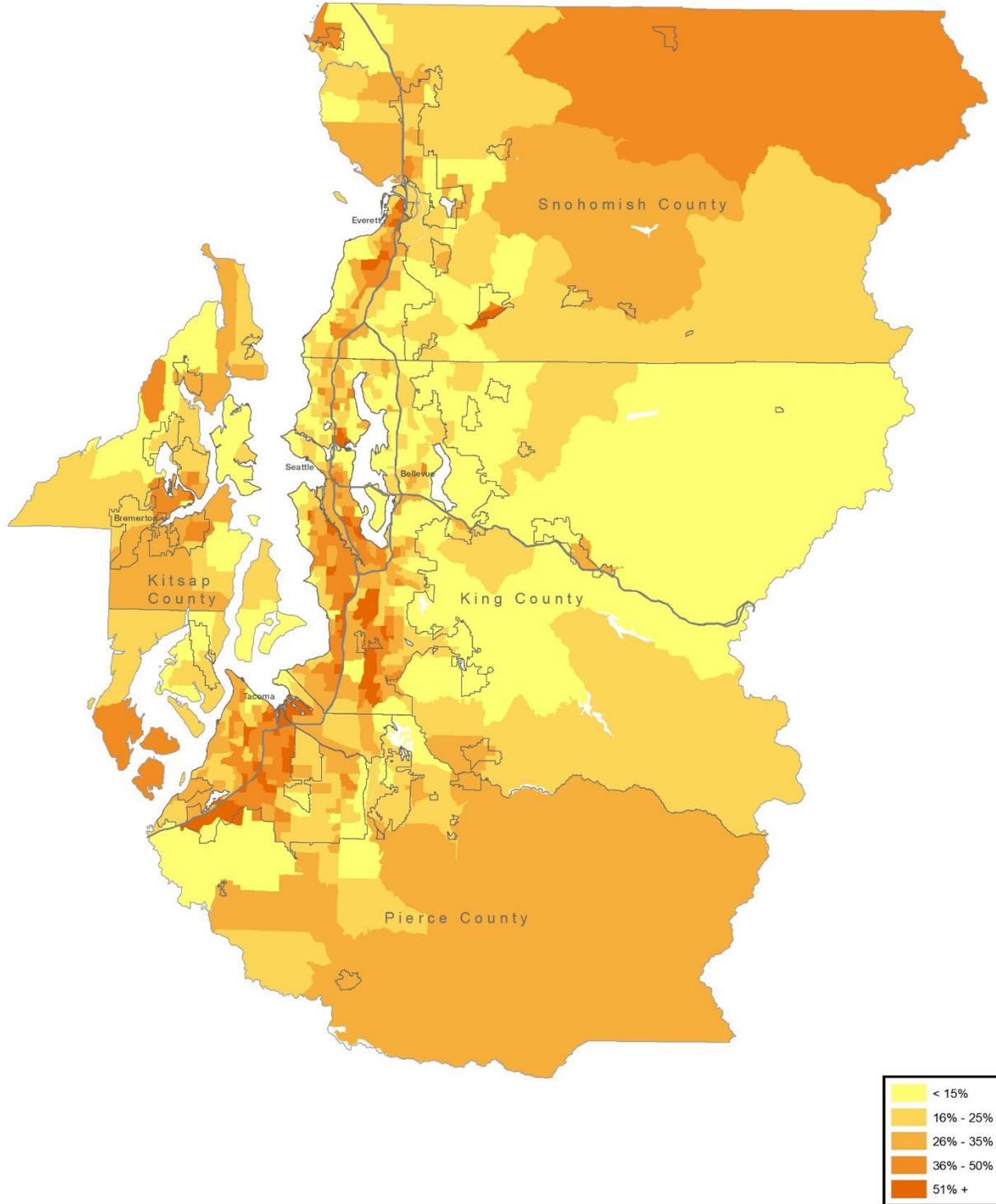
Source: American Community Survey 5-year estimates

Figure 46. People with Low Income, Central Puget Sound: 2000



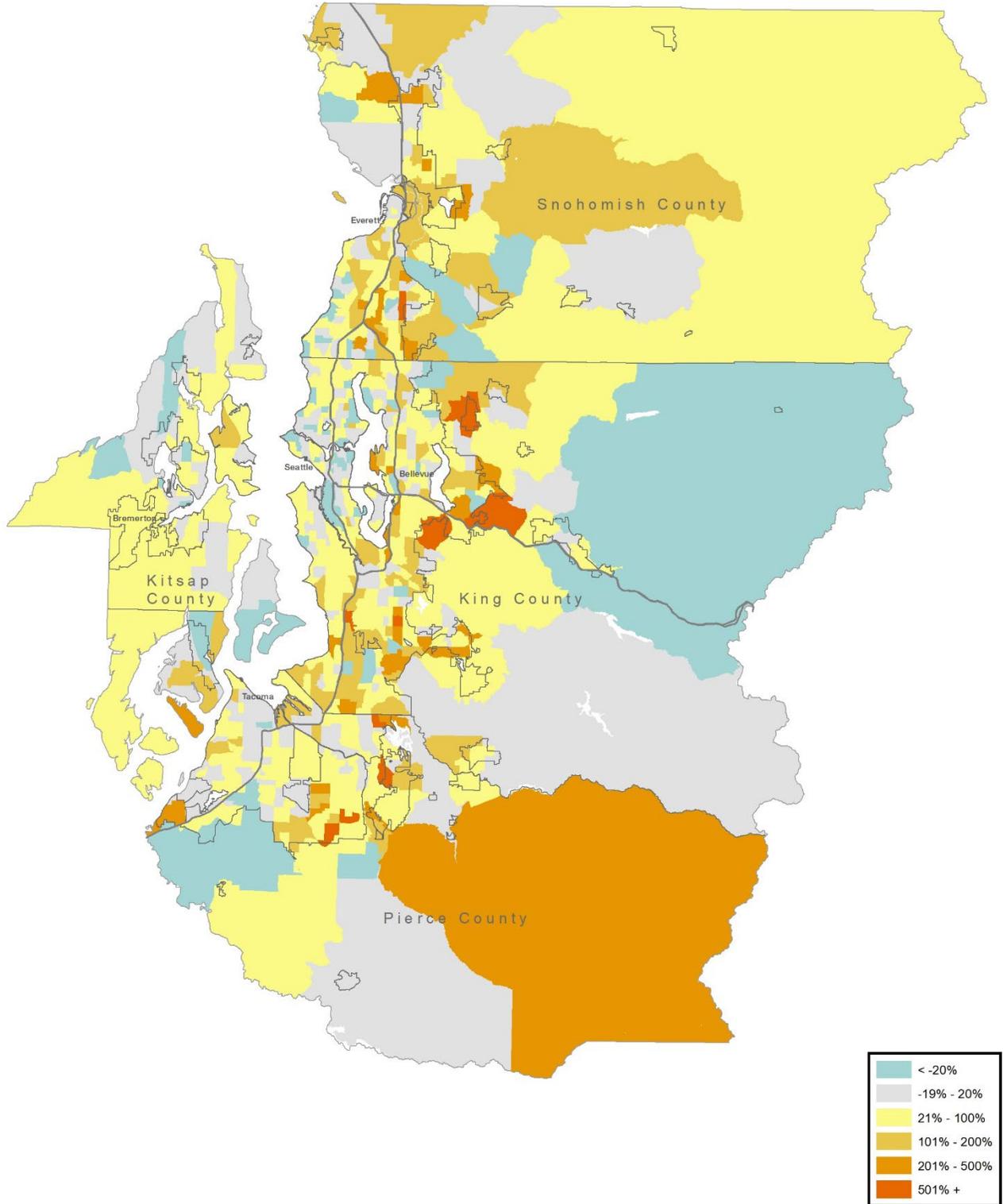
Source: American Community Survey 5-year estimates

Figure 47. People with Low Income, Central Puget Sound: 2016



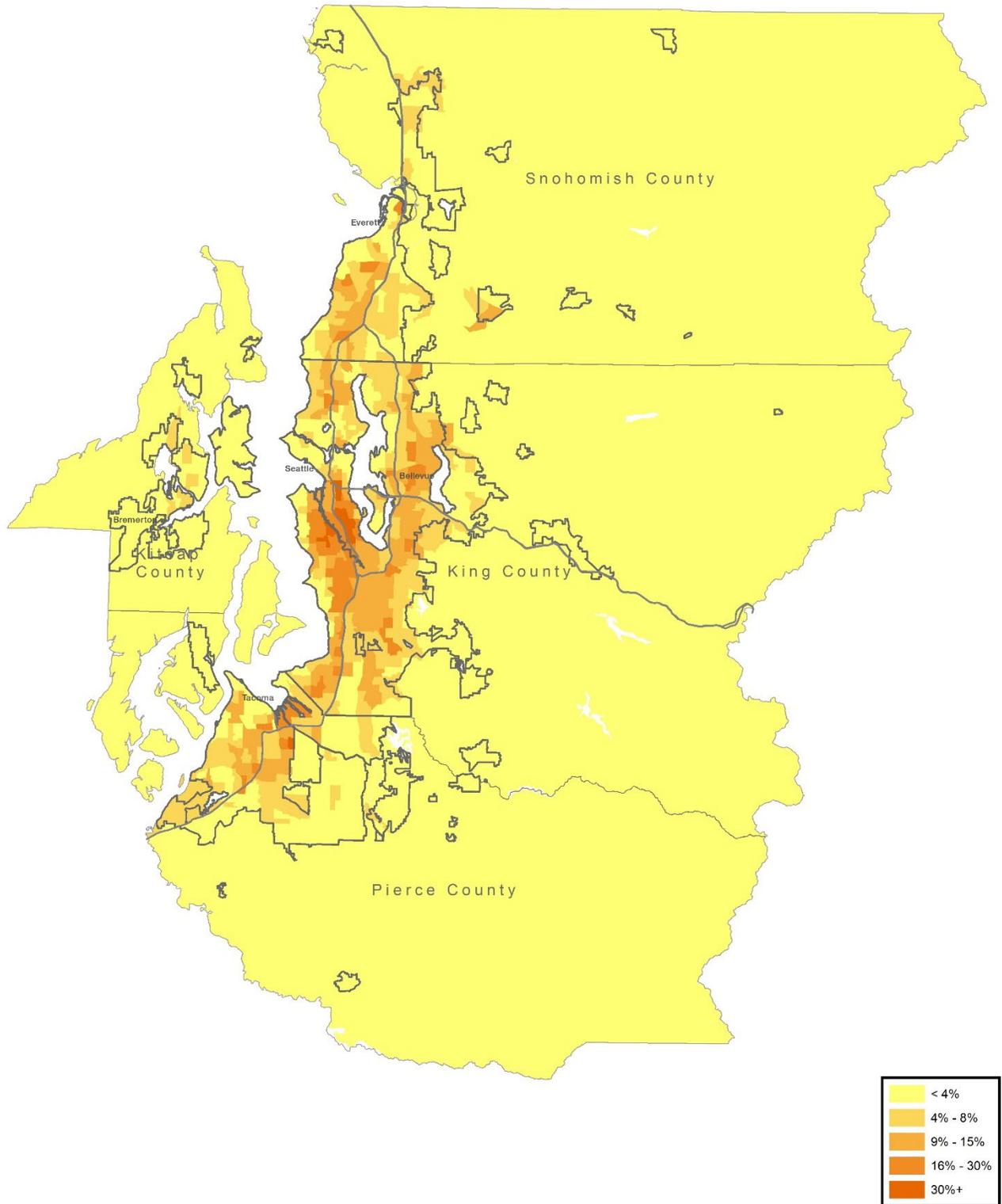
Source: American Community Survey 5-year estimates

Figure 48. Change in People with Low Income, Central Puget Sound: 2000-2016



Source: American Community Survey 5-year estimates

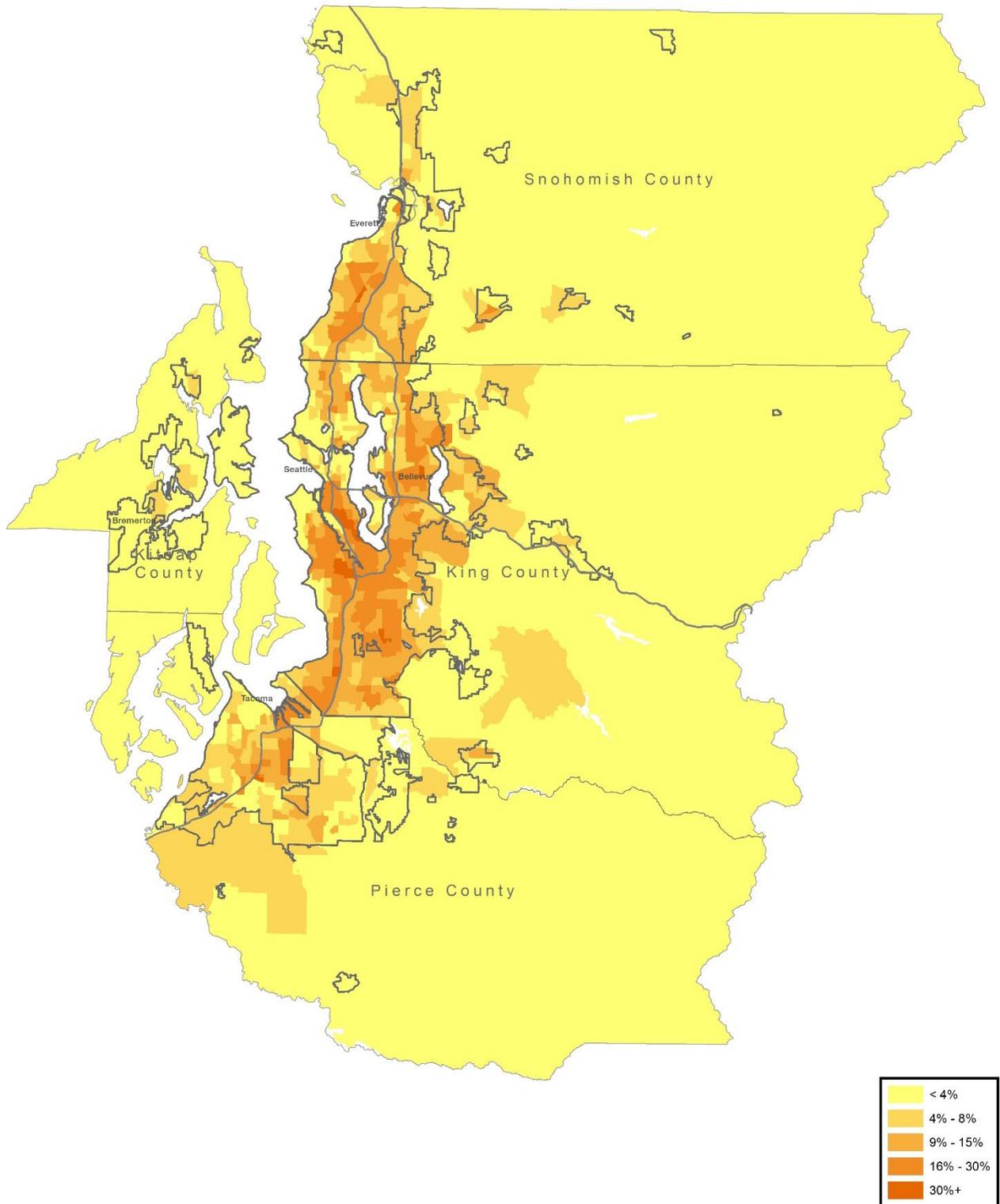
Figure 49. Limited English Proficiency, Central Puget Sound: 2000



Source: American Community Survey 5-year estimates

Note: Due to small population size, estimates for some of the census tracts shown are not as reliable as for other tracts and care should be taken when using this data.

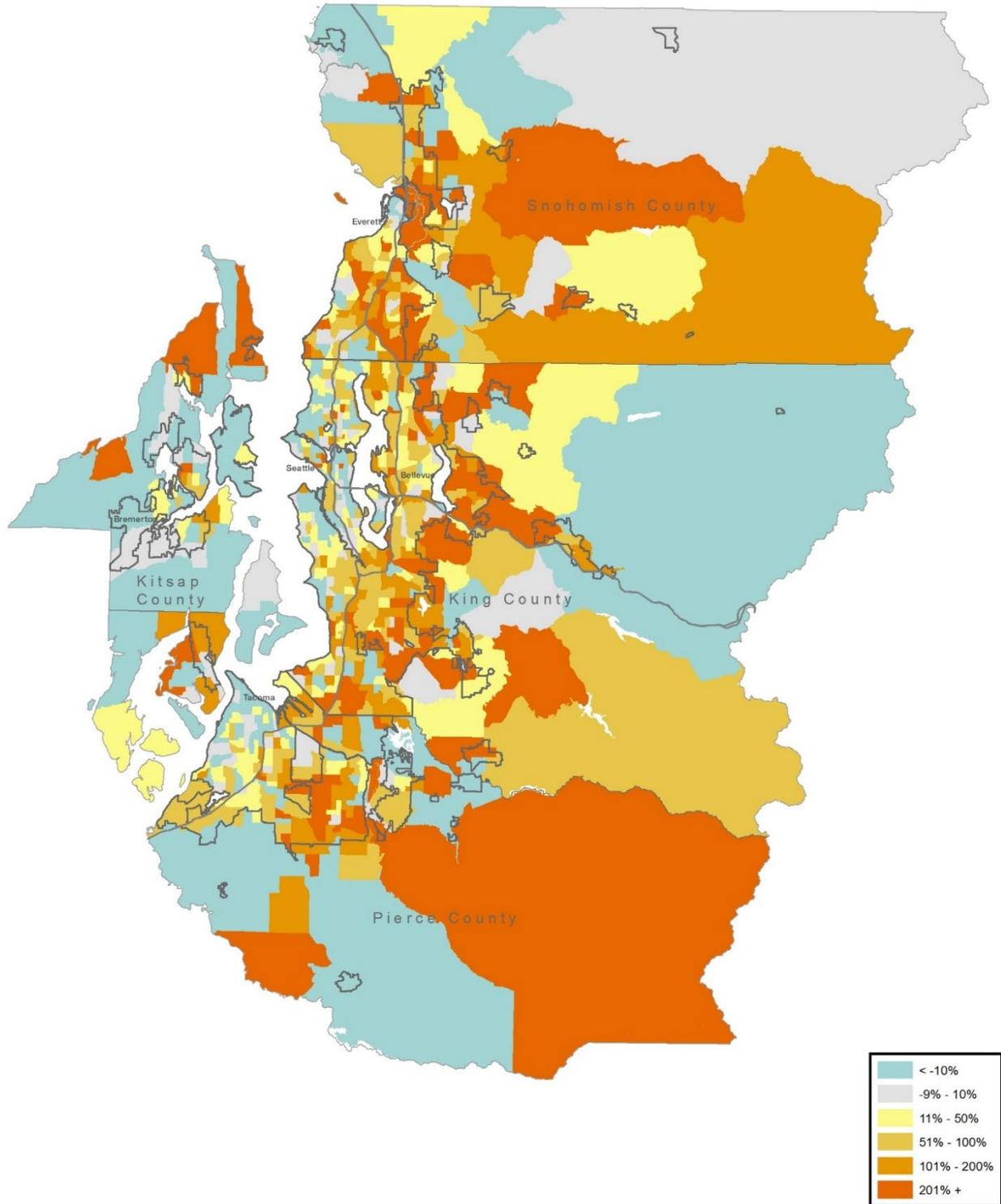
Figure 50. Limited English Proficiency, Central Puget Sound: 2016



Source: American Community Survey 5-year estimates

Note: Due to small population size, estimates for some of the census tracts shown are not as reliable as for other tracts and care should be taken when using this data.

Figure 51. Change in Limited English Proficiency, Central Puget Sound: 2000-2016

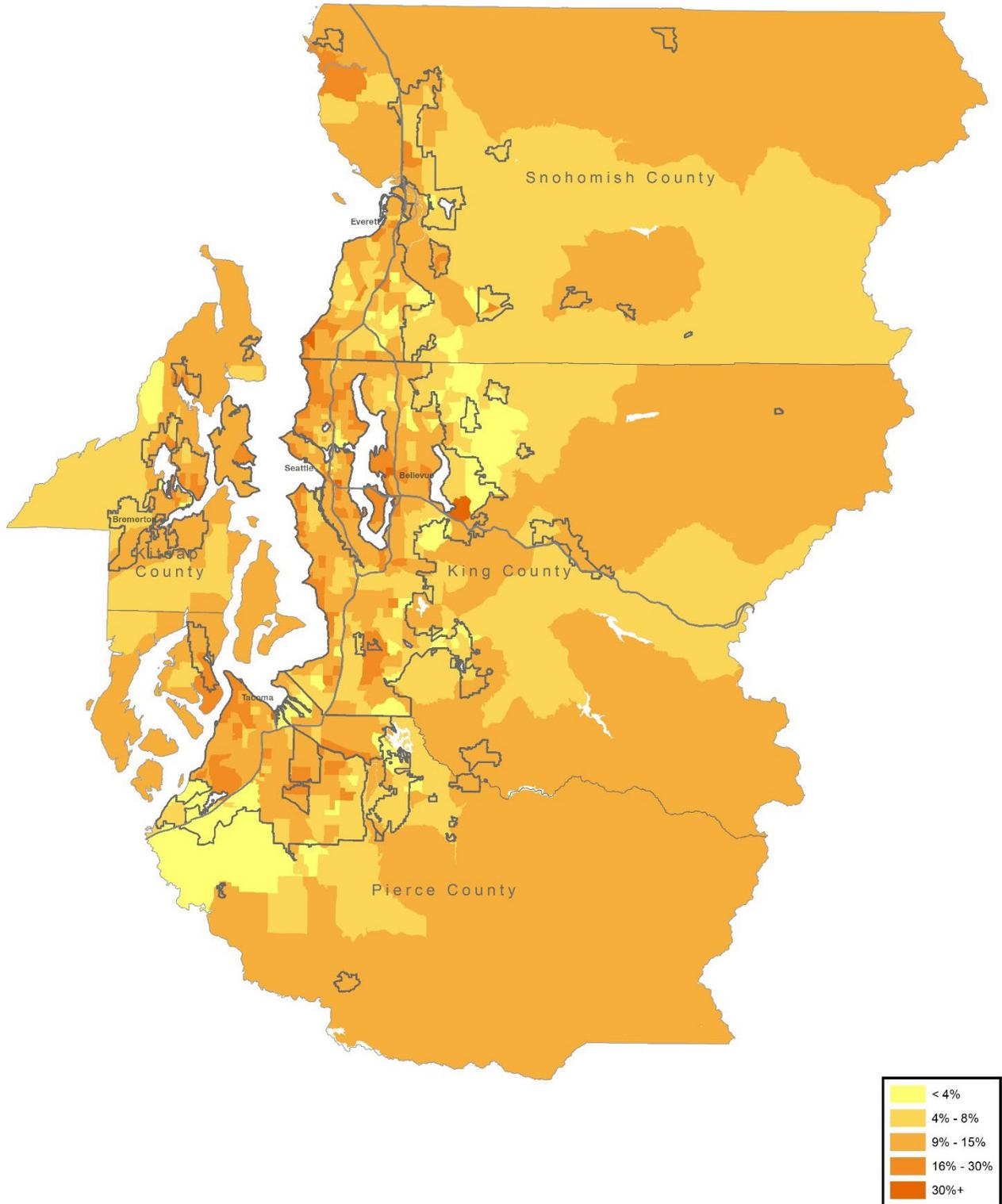


Source: American Community Survey 5-year estimates

Due to small population size, census-tract level estimates for some of the census tracts shown is not reliable.

Note: Due to small population size, estimates for some of the census tracts shown are not as reliable as for other tracts and care should be taken when using this data.

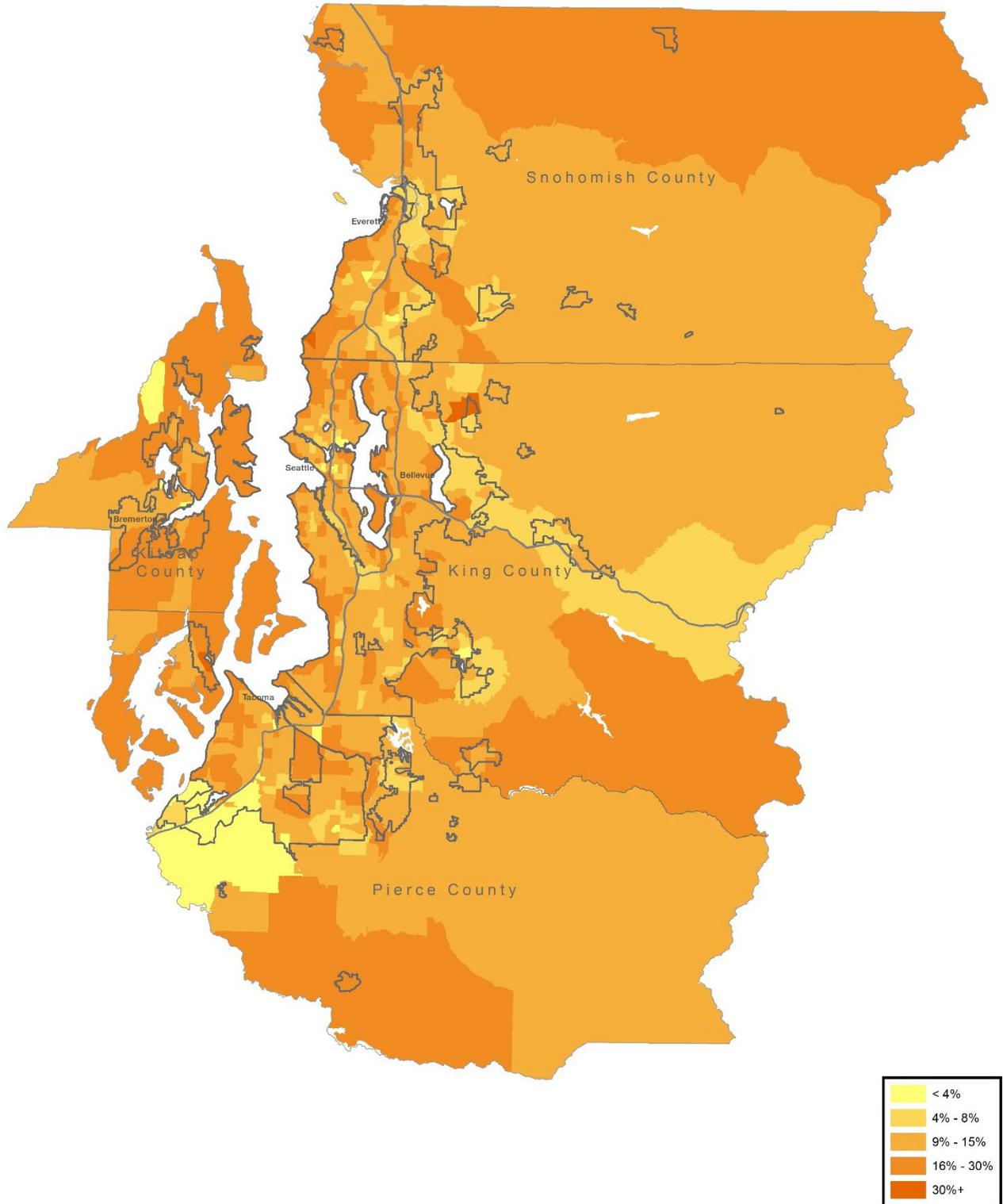
Figure 52. Elderly, Central Puget Sound: 2000



Source: American Community Survey 5-year estimates

Note: Due to small population size, estimates for some of the census tracts shown are not as reliable as for other tracts and care should be taken when using this data.

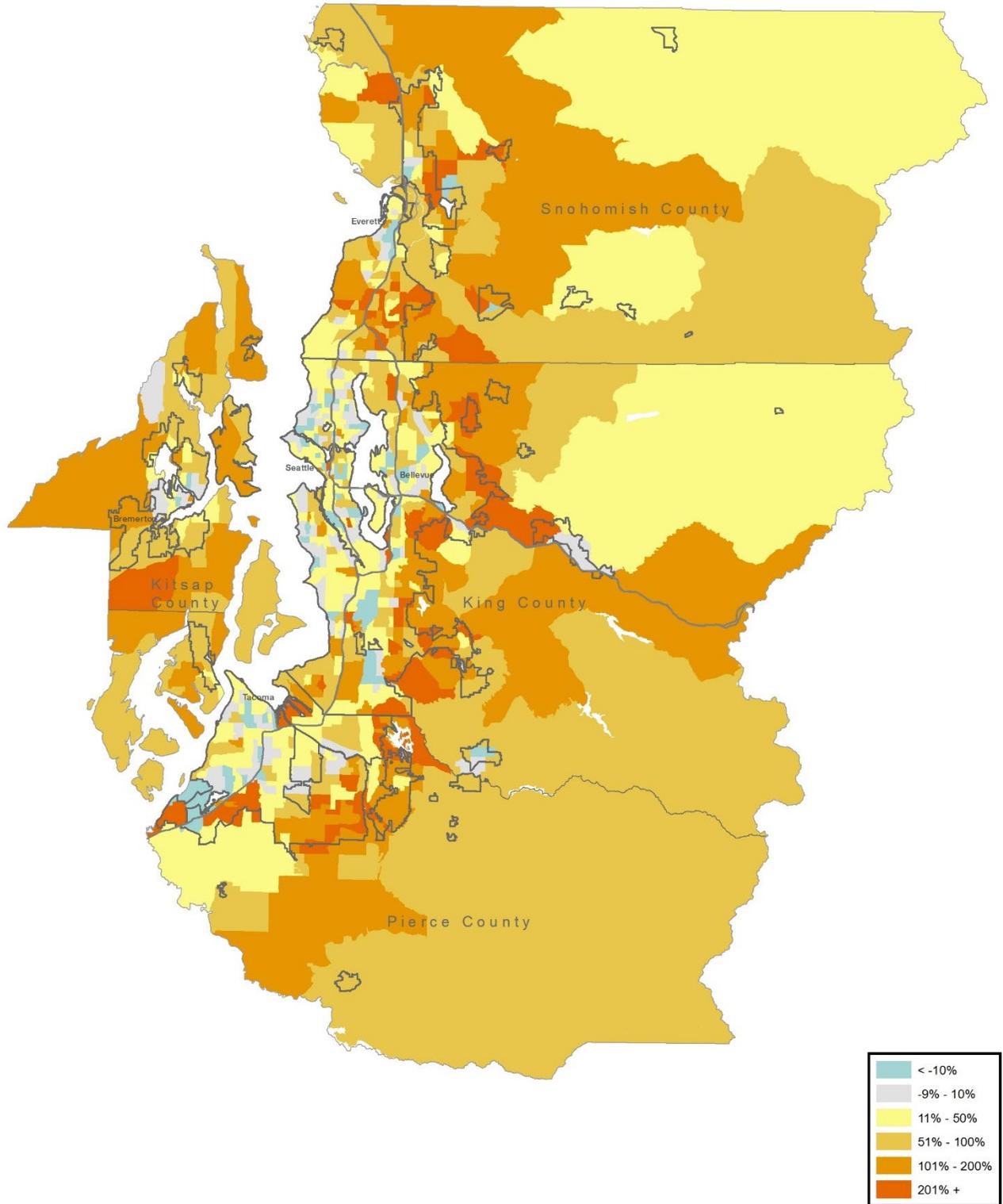
Figure 53. Elderly, Central Puget Sound: 2016



Source: American Community Survey 5-year estimates

Note: Due to small population size, estimates for some of the census tracts shown are not as reliable as for other tracts and care should be taken when using this data.

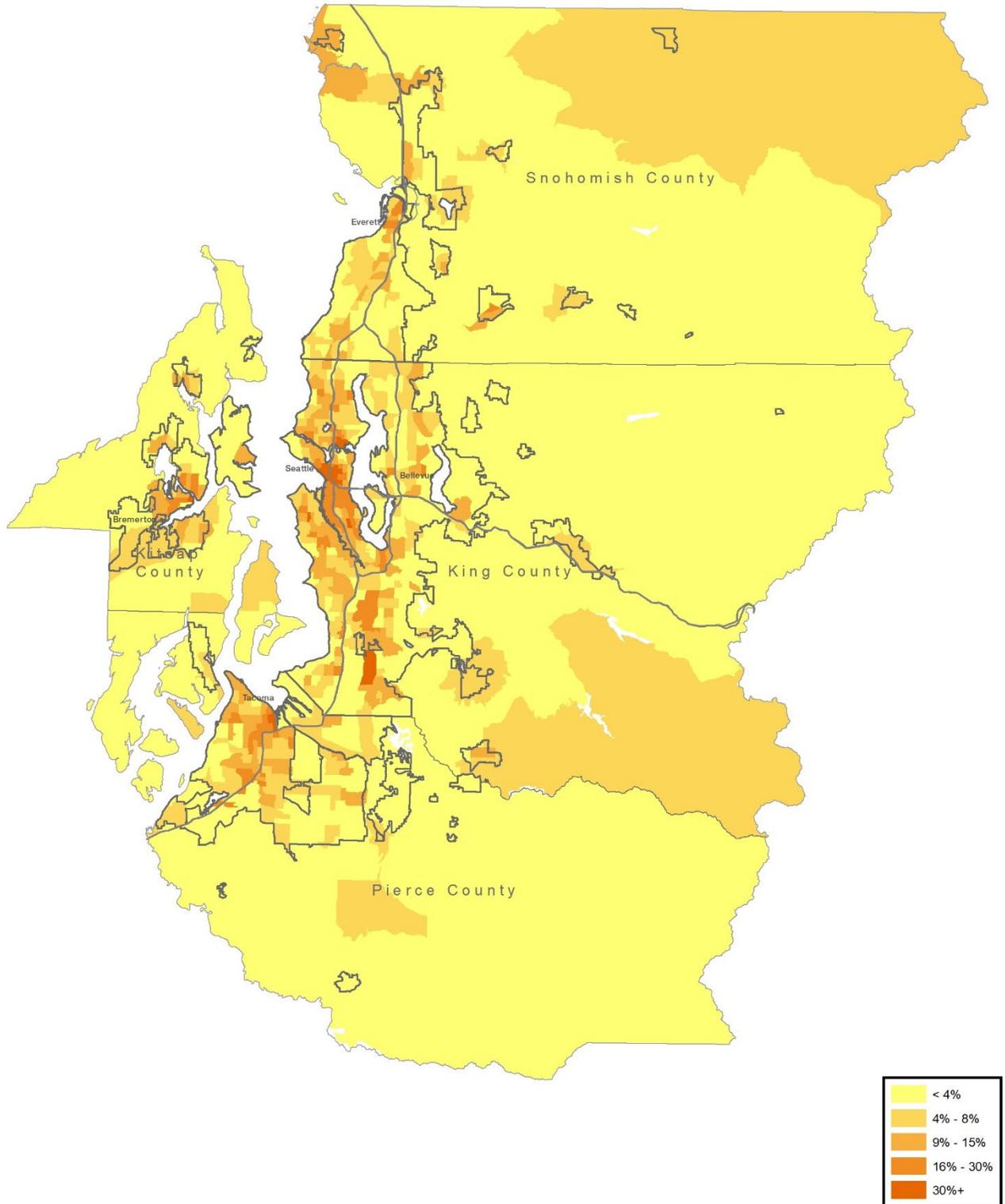
Figure 54. Change in Elderly, Central Puget Sound: 2000-2016



Source: American Community Survey 5-year estimates

Note: Due to small population size, estimates for some of the census tracts shown are not as reliable as for other tracts and care should be taken when using this data.

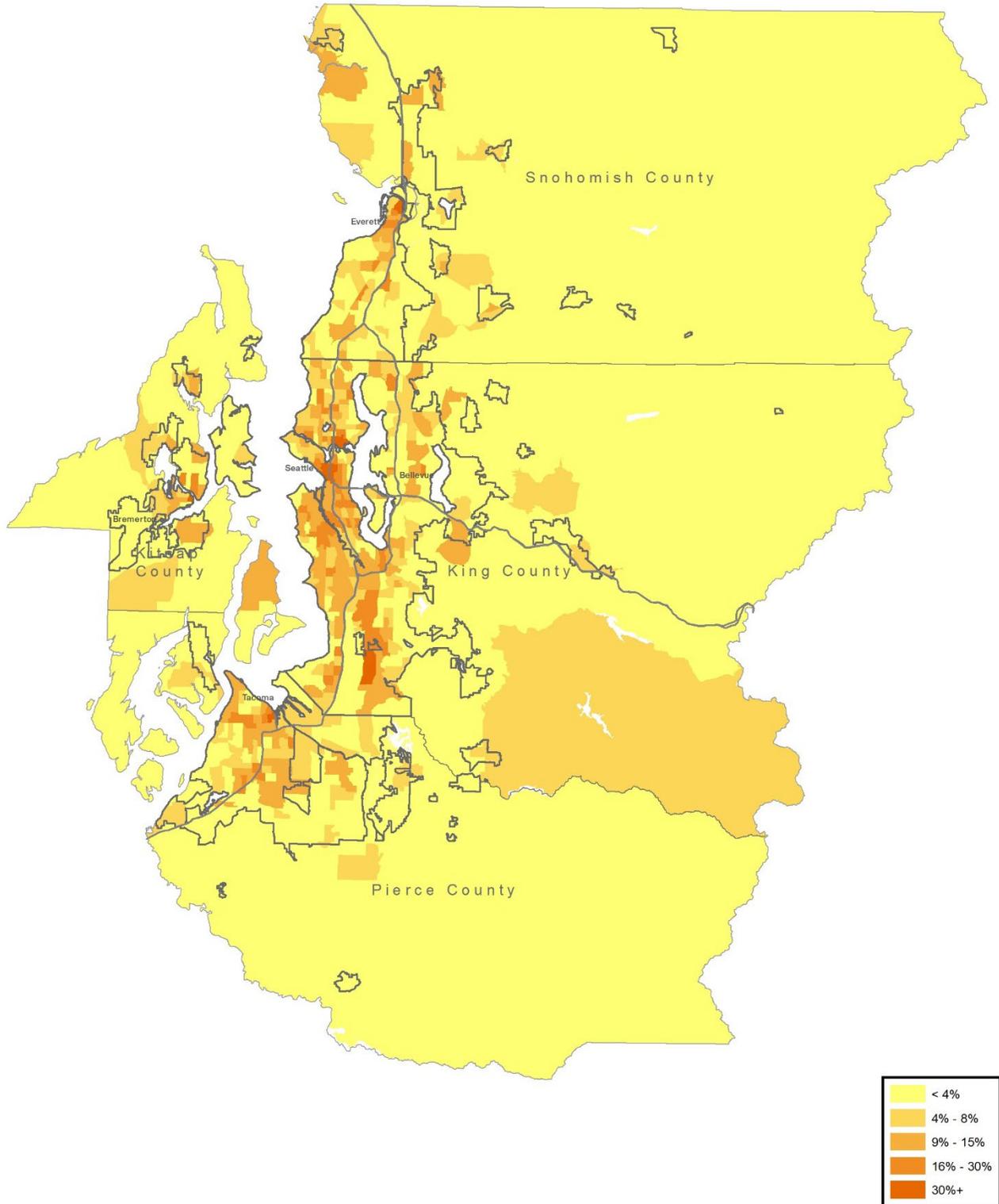
Figure 55. Zero-Vehicle Households, Central Puget Sound: 2000



Source: American Community Survey 5-year estimates

Note: Due to small population size, estimates for some of the census tracts shown are not as reliable as for other tracts and care should be taken when using this data.

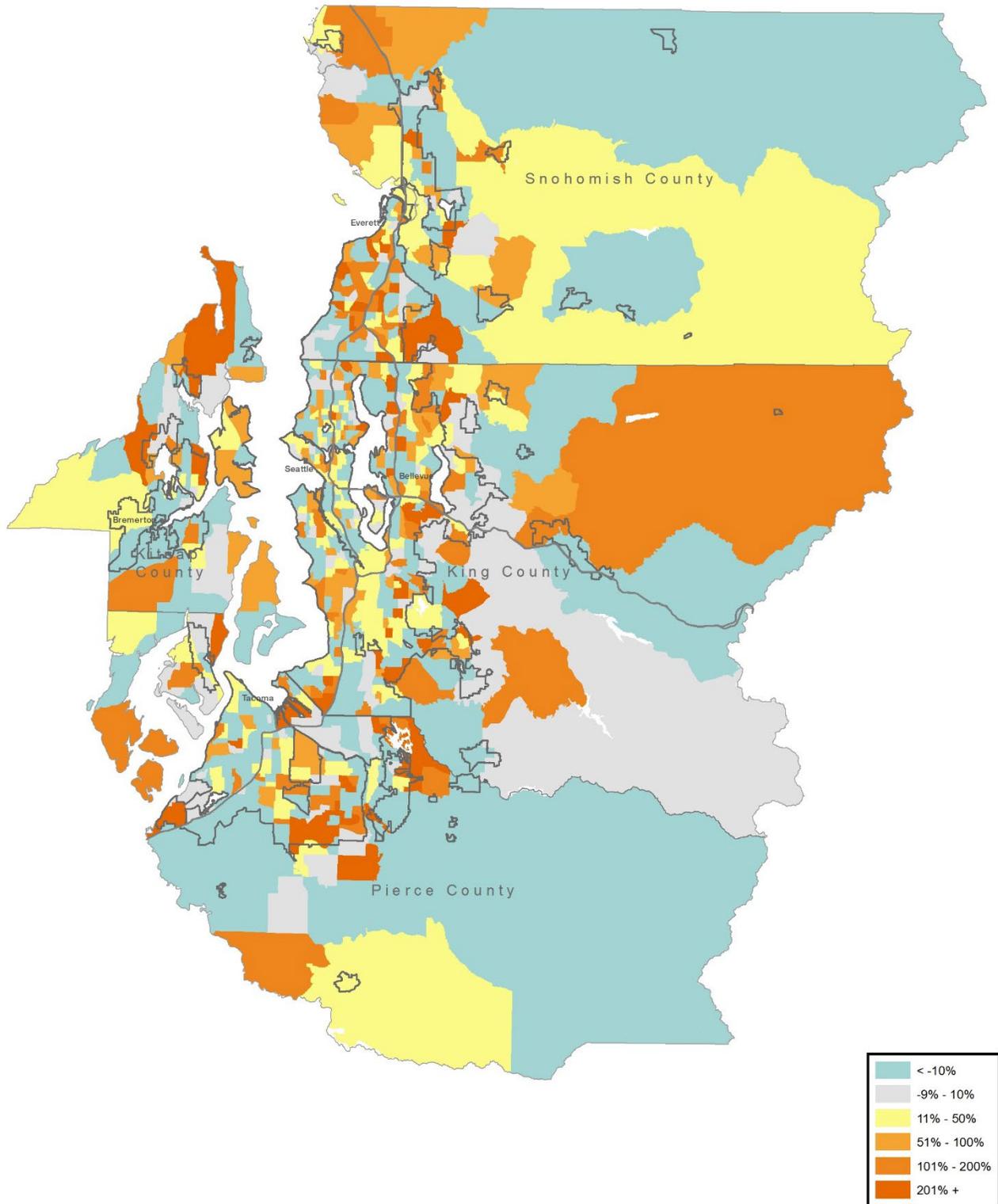
Figure 56. Zero-Vehicle Households, Central Puget Sound: 2016



Source: American Community Survey 5-year estimates

Note: Due to small population size, estimates for some of the census tracts shown are not as reliable as for other tracts and care should be taken when using this data.

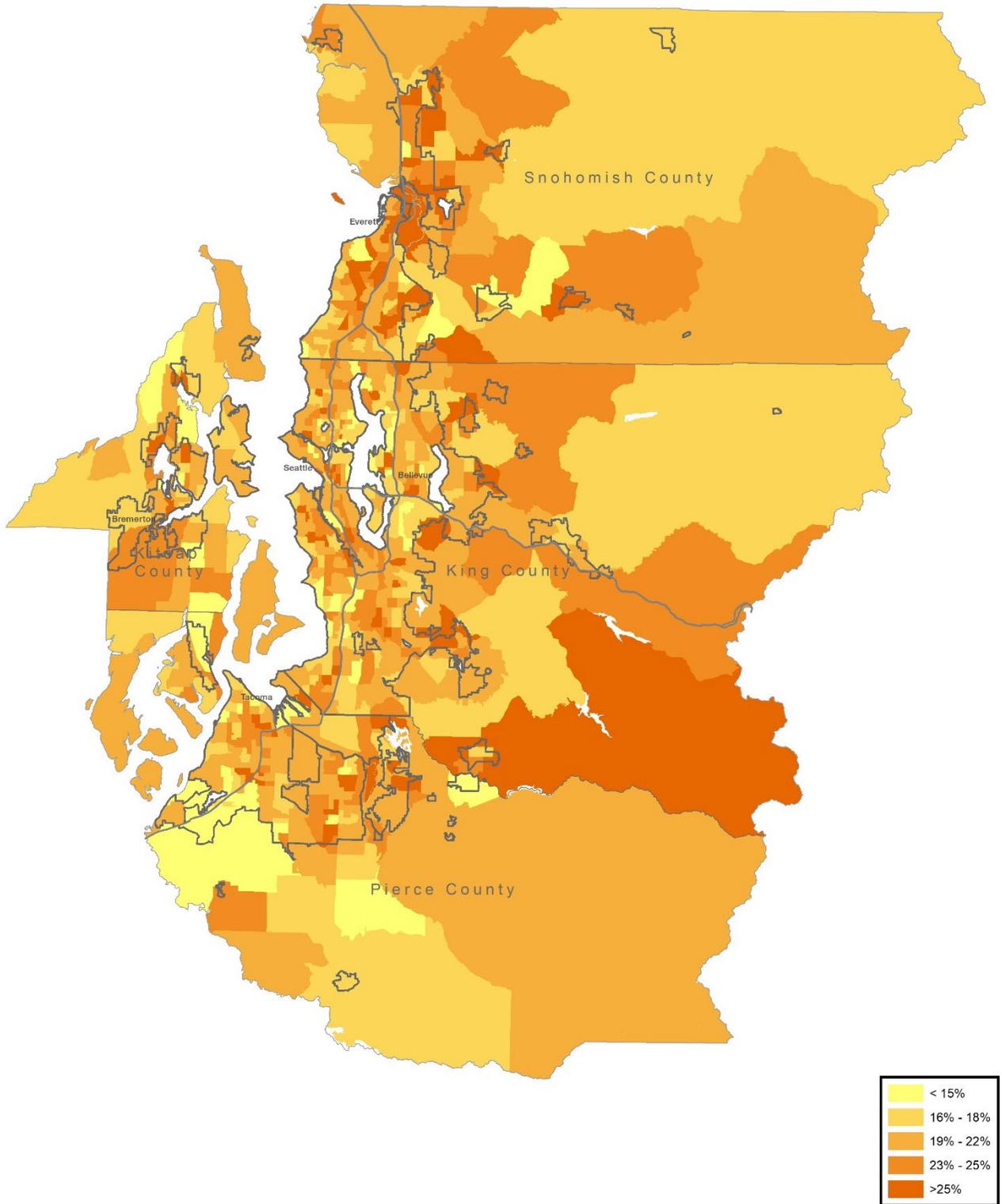
Figure 57. Change in Zero-Vehicle Households, Central Puget Sound: 2000-2016



Source: American Community Survey 5-year estimates

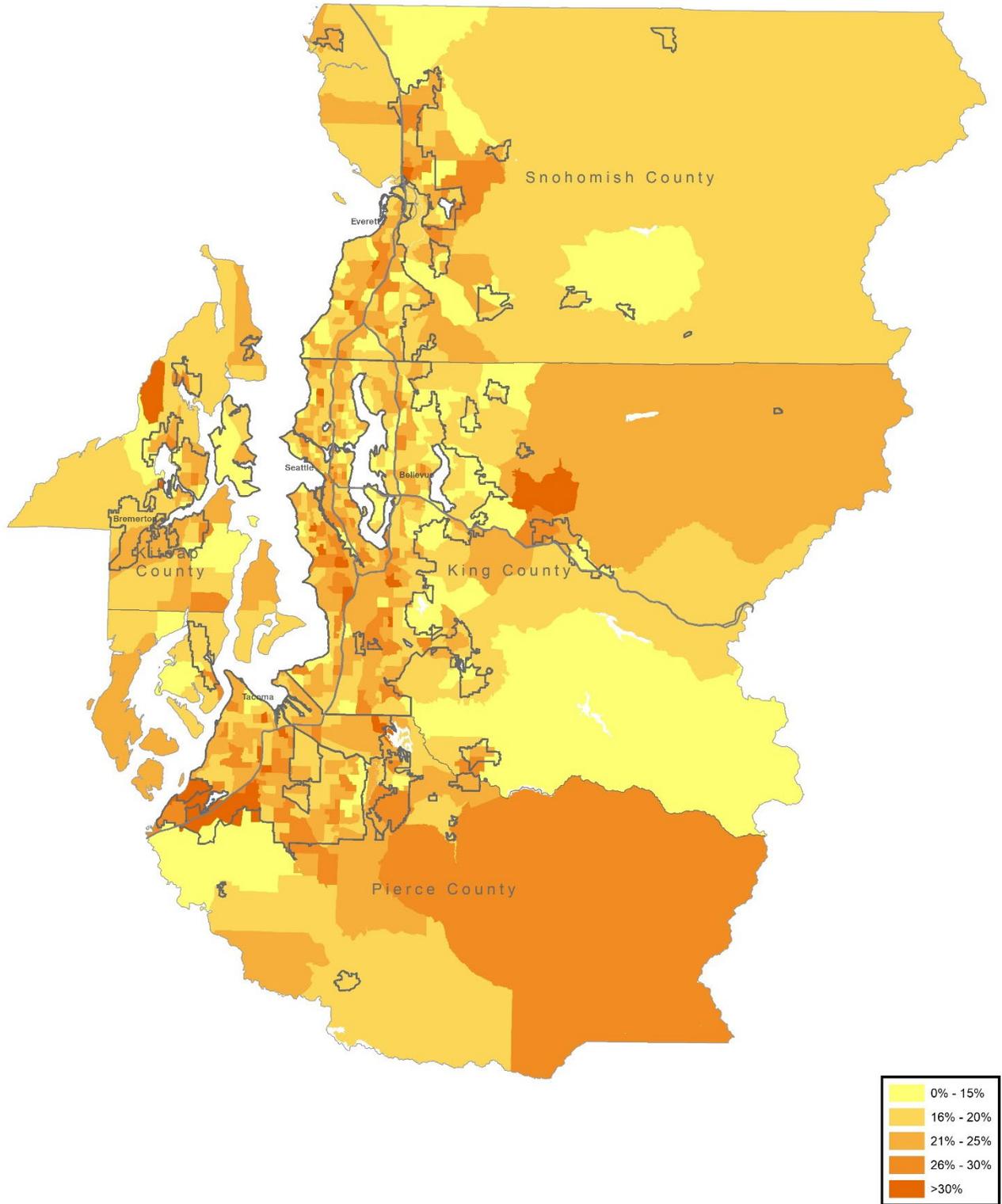
Note: Due to small population size, estimates for some of the census tracts shown are not as reliable as for other tracts and care should be taken when using this data.

Figure 58. Housing Cost Burdened, Central Puget Sound: 2000



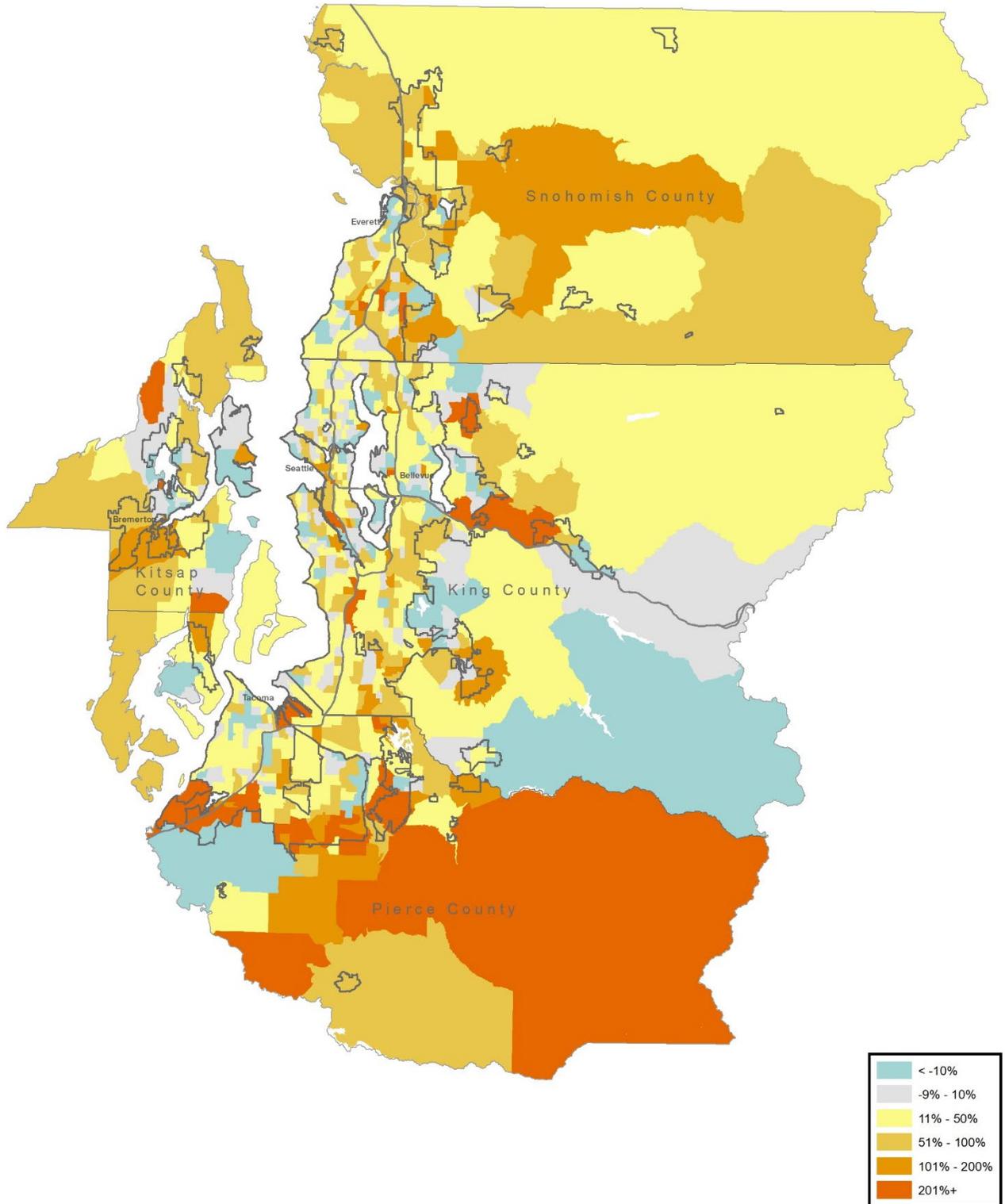
Source: American Community Survey 5-year estimates

Figure 59. Housing Cost Burdened, Central Puget Sound: 2016



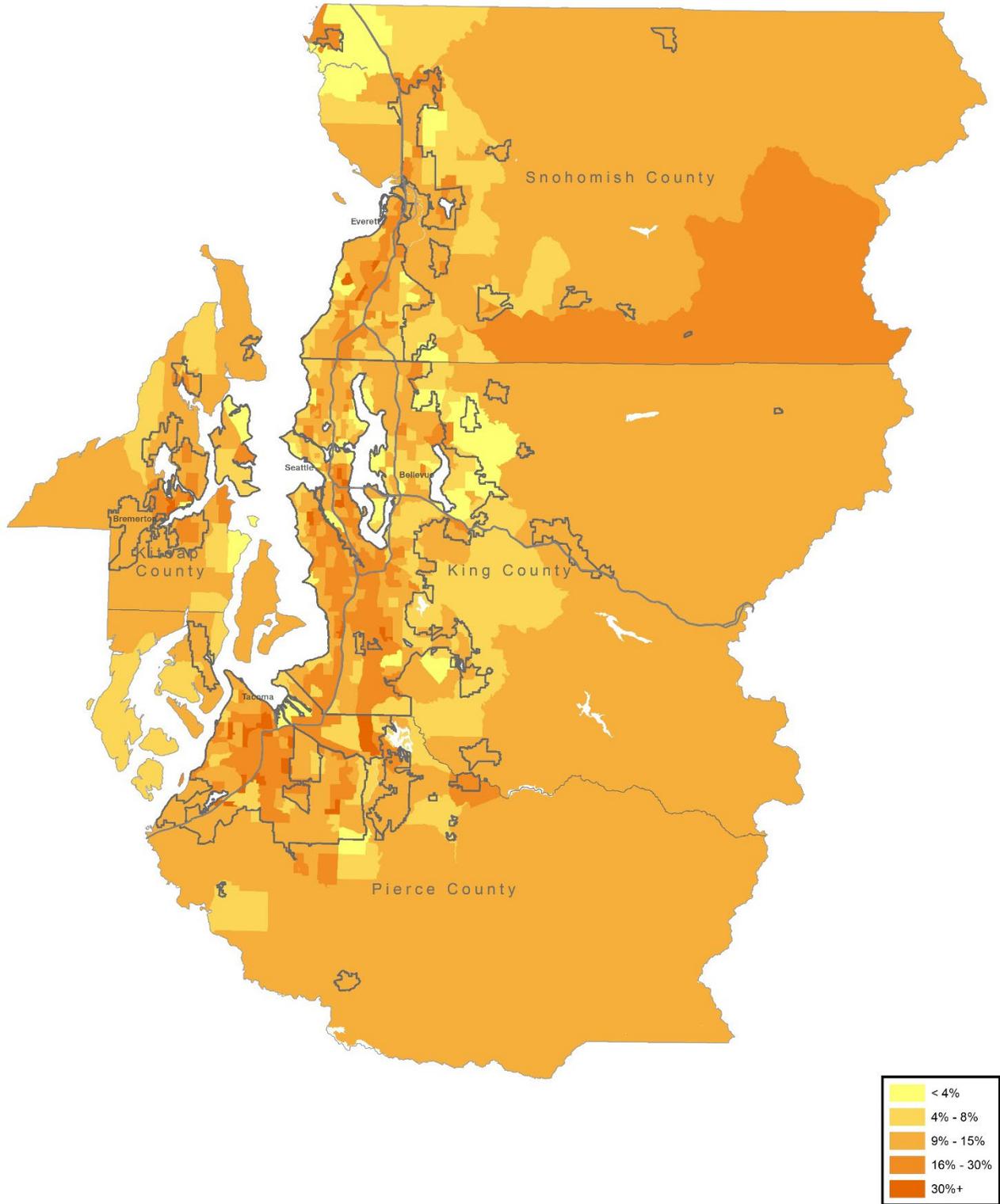
Source: American Community Survey 5-year estimates

Figure 60. Change in Housing Cost Burdened, Central Puget Sound: 2000-2016



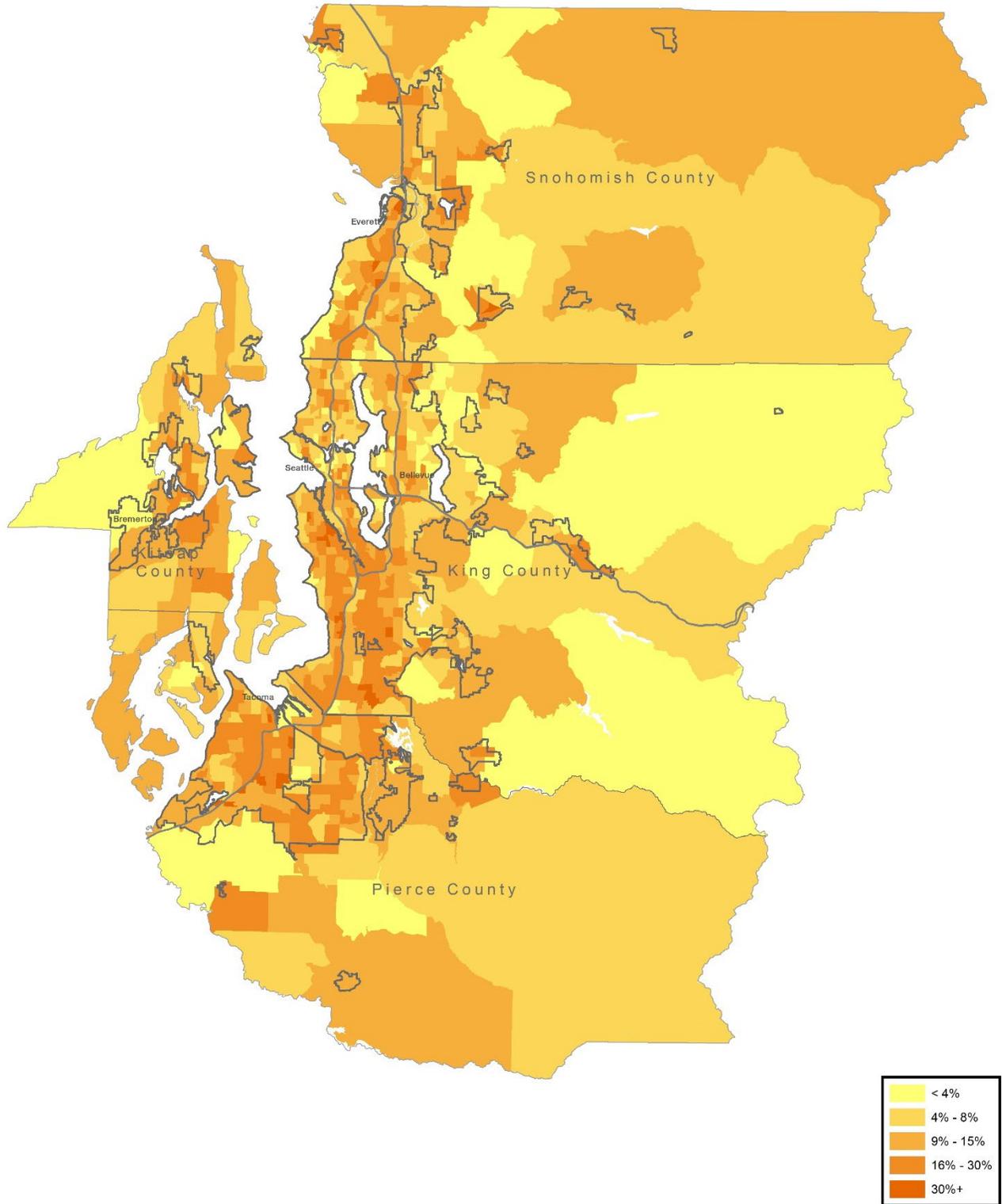
Source: American Community Survey 5-year estimates

Figure 61. Single-Parent Households, Central Puget Sound: 2000



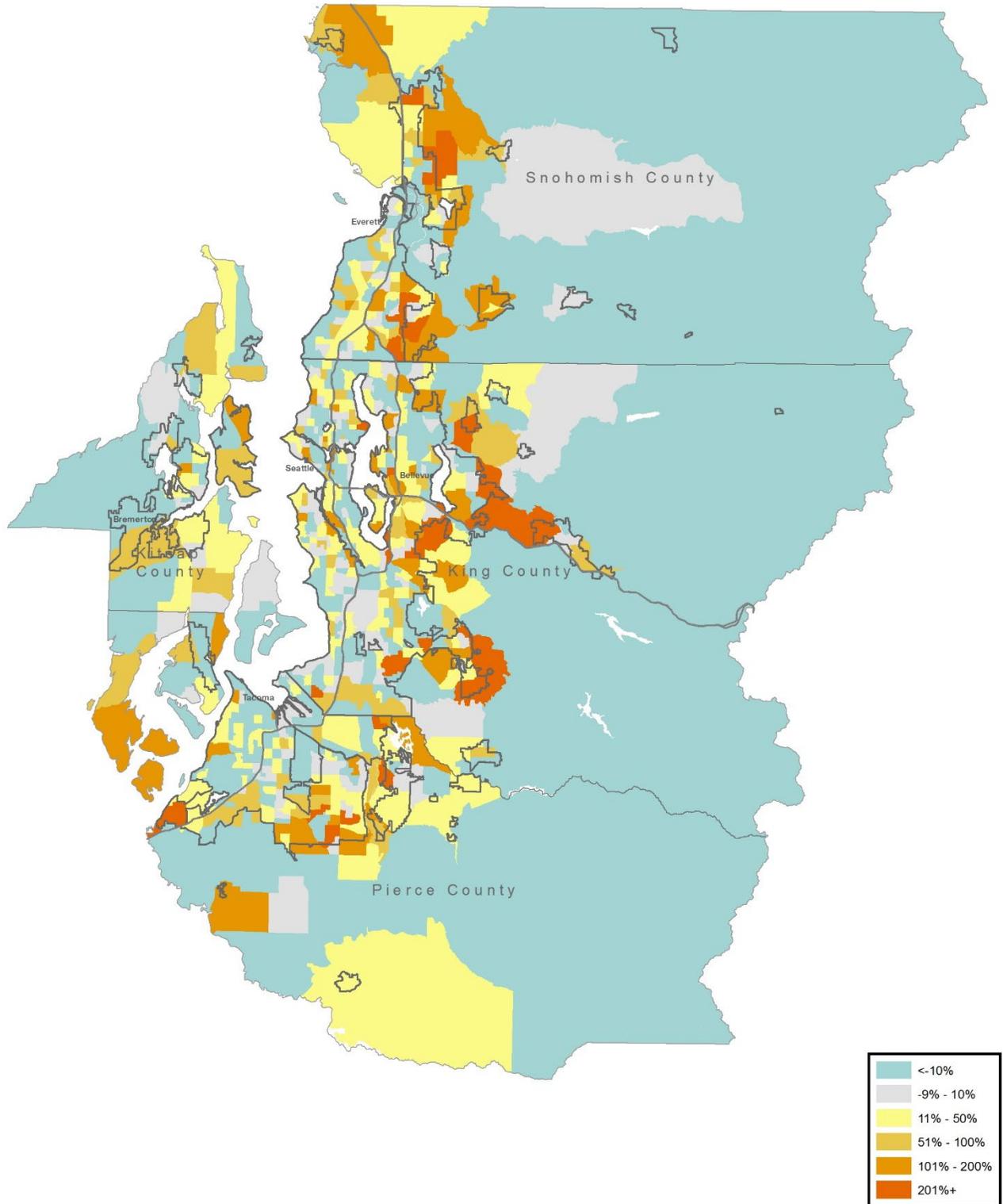
Source: American Community Survey 5-year estimates

Figure 62. Single-Parent Households, Central Puget Sound: 2016



Source: American Community Survey 5-year estimates

Figure 63. Change in Single-Parent Households, Central Puget Sound: 2000-2016

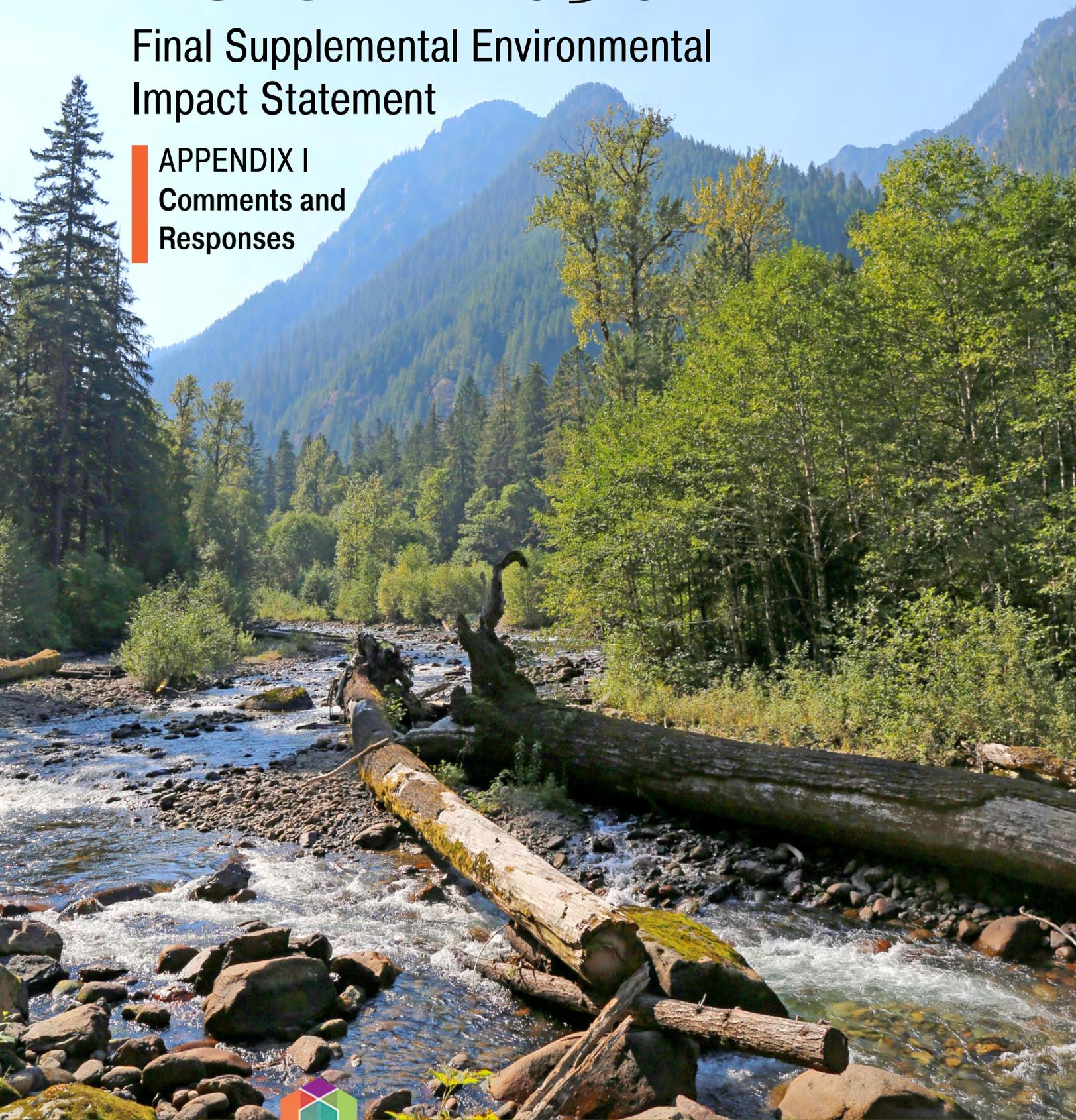


Source: American Community Survey 5-year estimates

# VISION 2050

## Final Supplemental Environmental Impact Statement

**APPENDIX I**  
**Comments and**  
**Responses**





# Appendix I: Comments on the VISION 2050 Draft SEIS and Responses

*This appendix contains all of the comments submitted on the VISION 2050 Draft Supplemental Environmental Impact Statement and provides a response to each comment. Note that comments were submitted through a variety of communication channels and some formatting changes may have occurred to transcribe the content into this appendix.*

## Table of Contents

Commenter(s)	Page
<b>Businesses</b>	
Escala Condominium	I-7
Master Builders Association of King and Snohomish Counties	I-9
Master Builders Association of Pierce County	I-14
Seattle King County Realtors	I-16
<b>Local Government</b>	
City of Arlington	I-19
City of Auburn	I-19
City of Bellevue	I-20
City of Bonney Lake	I-21
City of Bothell	I-22
City of Bremerton	I-24
City of Covington	I-24
City of Des Moines	I-25
City of Edmonds	I-26
City of Everett	I-27
City of Everett (verbal comment)	I-30
City of Everett (climate-specific comment)	I-30
City of Issaquah	I-31
City of Kirkland	I-32
City of Lake Stevens	I-33
City of Lakewood	I-33
City of Lynnwood	I-42
City of Marysville	I-43
City of Mercer Island	I-43

<b>Commenter(s)</b>	<b>Page</b>
City of Monroe	I-44
City of North Bend	I-45
City of Port Orchard	I-46
City of Redmond	I-46
City of Sammamish	I-49
City of Seattle	I-49
City of Shoreline	I-51
City of Snoqualmie	I-51
City of Steilacoom	I-52
City of Sumner	I-53
City of Tacoma	I-54
City of University Place	I-56
City of Woodinville	I-56
Joint letter: City of Shoreline, City of Woodinville, City of Kenmore, City of Lake Forest Park, City of Bothell	I-57
Seattle Public Schools	I-57
Seattle Public Utilities	I-59
Joint letter: King County, City of Burien, City of Kent, City of Kirkland, City of Redmond, City of Shoreline, City of Seattle, City of Tukwila	I-60
Kitsap County	I-61
Pierce County	I-63
Snohomish County	I-65
Tacoma-Pierce County Health Department	I-67
Tacoma-Pierce County Healthy Community Planning Interest Group	I-68
<b>Federal Agencies</b>	
U.S. Environmental Protection Agency	I-73
<b>Organizations</b>	
350 Seattle	I-74
Climate Solutions	I-75
Joint letter: Emerald Alliance, Transportation Choices Coalition, Mountains to Sound Greenway, Trust for Public Land, Conservation Northwest, SM Watts Consulting LLC	I-76
Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium	I-78
League of Women Voters of Washington	I-82
Puget Sound Sage	I-84
Puget Sound School Coalition - King County Component	I-86
Sierra Club Washington	I-87
The Wilderness Society	I-96
<b>Regional and Transit Agencies</b>	
Alderwood Water & Wastewater District	I-97
Community Transit	I-98

<b>Commenter(s)</b>	<b>Page</b>
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	I-98
Pierce Transit	I-111
Pierce Transit (staff comment)	I-112
Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett	I-113
Puget Sound Clean Air Agency	I-119
Snohomish County Tomorrow	I-119
Sound Transit	I-121
<b>State Agencies</b>	
Washington State Department of Ecology	I-122
Washington State Department of Archaeology and Historic Preservation	I-125
Washington State Department of Transportation	I-126
<b>Individuals</b>	
Alex Jones	I-129
Alex Tsimerman	I-129
Alexander Thomson	I-129
Alice Lockhart	I-129
Andrew Sang	I-129
Ann Stevens	I-129
Barbars Joyner	I-129
Blake Wedekind	I-130
Brad Book	I-130
Bryan Weinstein	I-130
Carolyn Hollack	I-130
Carreen Rubenkönig	I-130
Carter Burns	I-130
Cary Westerbeck	I-130
Chris Philips	I-130
Christine Coyle	I-131
Cliff Hanks	I-131
Connie Combs	I-131
Dan Wallace	I-131
Daniel Salinas	I-131
David Hancock	I-131
Derek Young	I-132
Elaine Nonneman	I-133
Grady Helseth	I-133
Gurvinder Singh	I-133
Heather Bruce	I-133
Heather Porter	I-133

<b>Commenter(s)</b>	<b>Page</b>
Hendrick Haynes	I-133
Ian Scott	I-141
James Cooper	I-141
Janine Graves	I-141
Jeannette Sumpster	I-141
Jeffrey Moidel	I-141
Jennifer Lutz	I-141
Jerry Meyer	I-141
Jerry Waugh	I-142
John Feit	I-142
John Niles	I-142
Johnathon Davis	I-142
Jordan Goldwarg	I-143
Karen Herring	I-143
Kate Lunceford	I-143
Kathryn Keller	I-143
Kevin Tisdell	I-143
Laura Klepfer	I-143
Lauren Anderson	I-143
Lori Mcconnell	I-144
Margaret Ivie	I-144
Maribeth Crandell	I-144
Marilyn Martinetto	I-144
Marilyn Martinetto, Marty Martinetto	I-145
Mark and Laurene Temple	I-145
Mark Spitzer	I-145
Marlice Camus	I-145
Mary-Anne Grafton	I-145
Megan Kruse	I-145
Melody Wisdorf	I-146
Meloney Turner	I-147
Michael Koznek	I-147
Michael Mccoy	I-147
Mike Todd	I-147
Nancy Johnson	I-147
Natalie Bicknell	I-147
Nina Milligan	I-148
Pam Kepford	I-148
Peggy Shepard	I-148
Peter Nigh	I-148

Commenter(s)	Page
Rick Krochalis	I-148
Robbie Adams	I-149
Robert Dinse	I-149
Robert Larsen	I-149
Robert Palon	I-150
Sally Lider	I-150
Sally Montgomery	I-150
Sally Van Over	I-150
Scott Marshall	I-150
Sharon Kay Ricketts	I-150
Stephan Petryczka	I-151
Steven Morris	I-151
Theresa Barker	I-151
Tim Harris	I-151



Commenter	Comment Number	Comment Text	Response
Escala Condominium	1	<p>10 years of innovation has transformed commerce, transportation and the way people live. Vision 2050 needs a full environmental review that captures fundamental shifts and data that didn't exist in 2008.</p> <p>Vision 2040, adopted in 2008, is the region's blueprint for creating strong communities with density, economic vitality and a healthy environment. But technological change and Puget Sound's rate of growth has far outpaced 2008 forecasts.</p> <p>The region's white-hot economy and natural beauty has brought companies and investors from around the world. Vision 2050 will direct dozens of municipalities' efforts to absorb an additional 1.8 million people and 1.2 million jobs.</p> <p>Communities of all sizes will employ Vision 2050 guidelines to allocate limited physical and financial resources, invest in infrastructure, and create legislation with wide-ranging environmental, economic and social impacts.</p> <p>Vision 2050 must be based on data that's complete, accurate and relevant. A Supplemental EIS isn't up to this task. The original 2008 EIS couldn't foresee the disruptions, innovations and research that have redefined modern life and business.</p> <p>Puget Sound companies and institutions have led some of these global life-style revolutions. After 10 years of explosive growth, ignoring fundamental changes and lessons we've learned will determine whether the region will emerge as a global leader or a massive casualty of unsustainable development.</p> <p>A regional plan must include new commerce and transportation modes</p> <p>Vision 2050 promotes mass transit as the key to adding density while maintaining a healthy environment and strong economy. Its three Supplemental EIS alternatives offer degrees of balance between density patterns and transit and other transportation modes. They estimate the impact each alternative will have on pollution, congestion, the built environment and community quality of life.</p> <p>But neither its original EIS nor proposed Supplement include transportation mode data for two phenomena of the past decade that have disrupted transportation planning: e-commerce deliveries and ride hailing services like Uber and Lyft, known collectively as Transportation Network Companies (TNCs).</p> <p>Use of both modes increases with density. Neither existed or was a factor in 2008 but today their impacts are dominating strained public right-of-ways and limited transportation infrastructure.</p> <p>Their effects on urban freight volumes and traffic mobility have been reported by municipalities across the country. The University of Washington and Seattle's Department of Transportation (SDOT) have led nationally recognized research on e-commerce. Yet delivery trucks and rideshare vehicles are not listed among Vision 2050's SEIS travel modes or calculations.</p> <p>Urban density is creating more traffic even if people don't own cars</p> <p>The draft SEIS and new Seattle transportation Level of Service (LOS) legislation identify Single Occupancy Vehicles (SOVs) as the biggest source of urban congestion and pollution. That may be true in some areas but in downtown Seattle, the epicenter of density, SOV use is 25% and falling.</p> <p>Instead of tracking multi-modal traffic PSRC and Seattle policy makers seek to control congestion and carbon emissions as well as finance new infrastructure by introducing SOV congestion pricing and implementing transportation impact fees.</p> <p>These policies may also deter economic vitality and impact social equity. More importantly they don't address the rising and uncounted percentage of traffic and daily vehicle miles generated by TNCs and e-commerce delivery trucks serving residents and workers in the urban core.</p> <p>As region's largest metropolitan center, downtown Seattle has provided an early test ground for residential and commercial density. TNCs and e-commerce deliveries are widespread here and surging.</p> <p>These modes have gone mainstream but are only mentioned in passing in Vision 2050's SEIS and the 2018 Regional Transportation Plan. They must be factored into future density plans. Here's what local and national research tell us about their impact on travel behavior, land use and loading.</p> <p>TNCs: an established mode that doesn't replace SOVs but draws users from transit.</p> <p>Local and national TNC research shows ride hailing service in city cores is growing unchecked. Affluent urbanites are the prime market. This is borne out by the latest available TNC statistics obtained from Uber/Lyft for the zip code of 98101; home to over a dozen downtown mixed use mega tower developments.</p> <p>In the half square mile of zip code 98101:  TNC rides rose 30% in 2017 to 4,893,444.</p> <p>The first two quarters of 2018 registered 3,009,062 total rides up 27% from the first two quarters of 2017.</p> <p>The 2nd quarter of 2018 averaged over 17,500 daily rides in this compact area. (Exhibit 1).</p> <p>These local findings are in line with a 2018 study recognized by SDOT. It reports TNC impacts on the country's top nine rideshare markets including Seattle.  <a href="http://www.schallerconsult.com/rideservices/automobility.pdf">http://www.schallerconsult.com/rideservices/automobility.pdf</a></p> <p>The Schaller report finds:  "Instead of 'replacing the personal auto' TNCs in large cities are primarily supplanting more space-efficient modes such as bus, subway, biking and walking. (p. 15).  Most Uber and Lyft rides are still private rides (each traveling party riding by themselves) and the addition of pooled options fails to offset TNC traffic-clogging effects. (p. 3)  TNCs add 2.8 driving miles to streets compared to 1 mile for every SOV for an overall 180% increase in driving on city streets (p. 3)  38% of TNC trips are in the city center City. Ridership in the city core averages 45 TNC trips per person in 2017. (p. 8)</p>	<p>The Supplemental Environmental Impact Statement (SEIS) provides new analysis and data that wasn't available for the EIS prepared for VISION 2040, including updated transportation networks and modern modelling tools that take into account recent travel behavior data. New mitigation measures in the Transportation Impacts section of the SEIS have been included to address transportation technology. Mitigation measures in the SEIS are implemented, in part, through policies in VISION 2050. A Technology Briefing Paper and a Freight Briefing Paper prepared for VISION 2050 discuss the changes in transportation technology and package delivery. Policies and actions in the Transportation section of VISION 2050 call for continued work to address technology and freight. The 2022 Regional Transportation Plan will further address technology and changing mobility, to the extent possible given the data available.</p>

Commenter	Comment Number	Comment Text	Response
		<p>TNCs are not making a dent in vehicle ownership. Seattle household ownership of vehicles has continued to rise with its population. (p. 21, Table 10). This is confirmed by many residential towers' plans to provide private parking stalls for 60-80% of their residential units despite being surrounded by multi-modal options.</p> <p>Density + E-commerce + Rising Freight Tonnage = Surging Truck Trips</p> <p>It may have started with Cyber Monday in 2005 but now every day is cyber day. E-commerce grew from 3.5% of retail sales in 2008 to 9.8% in the latest Census Bureau statistics. It is mainstream retail and growing 15% annually.</p> <p>The Regional Transportation Plan-2018 in Figure 12 p. 58 shows lock step correlation between increasing population, employment and truck tonnage. WSDOT reports 80% of all metro area truck trips are generated by deliveries of goods and services to regional and local delivery areas.</p> <p>In today's e-economy residents receive deliveries of food, furniture, hard and soft goods, clothing, recreational items and household supplies every day—and with on-demand and free 1-day delivery service, sometimes many times daily.</p> <p>The UW and SDOT predict that with NO population growth, e-commerce deliveries will double in Seattle's urban core.</p> <p>We know a lot about e-commerce deliveries but we're not counting the fleets of trucks it takes to deliver these goods or considering the ever-shrinking space they have to unload and the time it takes to do it.</p> <p>If Vision 2050 is going to lead the way to sustainable density it needs to address transportation impacts of e-commerce. These issues have been studied nationally with some of the most respected research being done locally by the UW and SDOT.</p>	
Escala Condominium	2	<p>Issue #1: Residential towers aren't being required to provide loading berths.</p> <p>A 2017 Hofstra University study shows this is wrong. It sought to quantify average deliveries generated by the number of units in apartment buildings. Analyzing deliveries at an apartment complex with upper middle class demographics, it determined each unit would generate an average 1.5 package deliveries per week. It speculated higher-end properties would generate more. <a href="https://www.metrans.org/sites/default/files/MF%205.1a_Residential%20Parcel%20Deliveries_Final%20Report_030717.pdf">https://www.metrans.org/sites/default/files/MF%205.1a_Residential%20Parcel%20Deliveries_Final%20Report_030717.pdf</a></p> <p>The study found that deliveries are concentrated Monday through Friday and that from January 2015 through 2017 parcel deliveries grew 17% annually correlating with the 15% annual growth estimates for U.S. online retail sales.</p> <p>Applying the Hofstra ratio of 1.5 weekly packages per unit, a typical Seattle residential tower of 900 people would average a minimum 784 weekly packages delivered mostly Monday-Friday. However, data from four Seattle luxury condos in the downtown core suggests the 1.5 package ratio is low and respondents note the variety of service providers that deliver by truck.</p> <p>More recent insight on the situation comes from a December 2018 Time magazine article. It explored the adverse impacts of e-commerce on urban transportation grids across the country, including Seattle's. <a href="http://time.com/5481981/online-shopping-amazon-free-shipping-traffic-jams/">http://time.com/5481981/online-shopping-amazon-free-shipping-traffic-jams/</a></p> <p>Among its findings:</p> <p>"Apartment and office towers are particular chokepoints because they receive large numbers of daily deliveries from Amazon and other retailers. Yet they typically have no loading docks or reserved parking for the UPS, Federal Express and U.S. Postal Service delivery trucks streaming to their curb-fronts."</p> <p>"University of Washington (UW) researchers in Seattle, the birthplace of both Amazon and United Parcel Service (UPS), have found that about half of the trucks making deliveries downtown are forced to park in unauthorized spots — blocking alleys, double parking on already congested streets or parking in bike lanes and other no-parking zones."</p> <p>Trucks make up 7% of total traffic but they account for 28% of the nation's congestion. (Texas A&amp;M University's Transportation Institute.)</p>	See responses above. Information from transportation studies and articles are appreciated. They have been shared with transportation planning staff. The SEIS provides regional-scale analysis of population and employment growth. Development standards for residential buildings are set by local jurisdictions.
Escala Condominium	3	<p>Issue #2: Shrinking curb space won't contain e-commerce deliveries</p> <p>Seattle-specific research speaks to the impacts of e-commerce and lack of curb space and dedicated internal loading infrastructure.</p> <p>The situation is described in a groundbreaking SDOT-sponsored report called 'The Final Fifty Feet'. That report concludes 87% of delivery trucks rely on street parking. As previously stated, it concludes even with zero population growth, e-commerce deliveries will double in the Seattle core by 2023.</p> <p><a href="https://depts.washington.edu/sctlctr/sites/default/files/SCTL_Final_50_full_report.pdf">https://depts.washington.edu/sctlctr/sites/default/files/SCTL_Final_50_full_report.pdf</a></p>	See previous response. Right of way design is addressed through local regulations. Actions in the Transportation section of VISION 2050 call for continued work to address freight issues.

Commenter	Comment Number	Comment Text	Response
Escala Condominium	4	<p>Issue #3: Cities need private sector infrastructure to sustain urban density</p> <p>In late 2018 the UW and SDOT released a second pioneering study documenting all Seattle's City Center alleys' infrastructure and occupancy. (Exhibit 2, Alley Infrastructure Inventory and Occupancy Study)</p> <p>The report included the following recommendations: (p. 7)</p> <p>Encourage the use of and/or development of new building and load/unload equipment designs to get vehicles out of the alley and into adjacent loading bays quickly.</p> <p>Revise alley design standards for future development so that Center City area alleys provide loading bays with entrances that angle in the correct direction for alley flow</p> <p>Provide sufficient space for trucks to fully extend equipment</p> <p>Provide space for trash/recycle containers to be stored out of travel lanes</p> <p>Seattle has done the important research showing how density and rising e-commerce will impact its City Center. Both UW/SDOT studies are being hailed and copied around the country and yet their lessons have yet to be incorporated into new Seattle tower designs.</p>	Information noted. See previous responses to commenter.
Escala Condominium	5	<p>PSRC needs to lead the way by incorporating the conclusions and recommendations of both UW/SDOT studies into Vision 2050's EIS.</p> <p>What do we have to lose?</p> <p>Puget Sound's transportation grid is the underpinning of healthy, safe and vibrant communities. It allows for the free flow of people and goods and the ability of fire, medical and police to reach tens of thousands urban residents and office workers. Even when mass transit is prevalent, our roads will continue to serve as main arteries carrying goods and services to people's doors.</p> <p>We must address the impacts of TNC's and e-commerce delivery trucks now or they will permanently limit the region's ability to sustain density and a healthy environment and economy. The consequences include:</p> <p>Loss of critical infrastructure. Towers will be built without adequate loading and waste/recycling facilities causing service trucks to circle city streets and block right of ways leading congestion.</p> <p>The region won't meet its goals for carbon emissions because it failed to account for increased delivery trucks and TNCs that essentially act as SOVs.</p> <p>Buildings and municipalities won't be prepared to deal with the mountain of recycling that is the by-product of e-commerce.</p> <p>Legislators and traffic planners won't effectively prioritize resources and legislation to deal with the biggest threats to mobility. In the urban core that threat may not be SOVs.</p> <p>Even if SOV use hits its target, urban core transit and HOV commuters will still be delayed because all sources of traffic are not being counted. This could lead public transit users' defection to less sustainable modes.</p> <p>VISION 2050 needs a new EIS. The world has changed and stakes are high.</p> <p>The Puget Sound Regional Council's environmental review process is intended to analyze the effects of continued growth and ways the region can respond to and accommodate that growth. The VISION 2040 FEIS from 2008 did not foresee today's world and falls short as a foundation for the environmental review that will take Puget Sound through the middle of the 21st Century.</p> <p>We ask you to consider the facts and make VISION 2050 a planning tool that uses current data to make Puget Sound a leader and not a casualty of the new global economy.</p>	See responses above. Actions in VISION 2050's Transportation section call for continued work to address technology and freight, and the Regional Transportation Plan is updated every four years.
Master Builders Association of King and Snohomish Counties	1	<p>Dear Paul,</p> <p>Thank you for the opportunity to comment on the Vision 2050 DSEIS. Attached please find MBAKS' comment letter, as well as the scoping comment letter MBAKS submitted last year.</p> <p>Let us know if you have questions or would like additional information.</p> <p>Best regards,</p> <p>Patricia</p> <p>April 29, 2019</p> <p>Paul Inghram</p> <p>Director of Growth Management</p> <p>Puget Sound Regional Council</p> <p>1011 Western Ave. Suite 500</p> <p>Seattle, WA 98104</p> <p>RE: Vision 2050 DSEIS Comments</p> <p>Dear Mr. Inghram:</p> <p>On behalf of the nearly 2,800 member companies of the Master Builders Association of King and Snohomish Counties (MBAKS), we appreciate the opportunity to provide the PSRC with comments concerning the Vision 2050 Draft Supplemental Environmental Impact Statement (DSEIS). We ask that these comments be considered and entered into the Vision 2050 project record.</p> <p>MBAKS members are the end users of city and county development regulations that are derived from Multi-County Planning Policies, Countywide Planning Policies, and Comprehensive Plans. MBAKS members have a keen interest in the Vision 2050 update and are focused on working closely with PSRC staff as the project moves forward.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS.

Commenter	Comment Number	Comment Text	Response
		<p>We appreciate the work of PSRC staff to prepare the DSEIS. The following comments relate to the selection of a Preferred Alternative. We have also provided a table of more detailed comments for consideration as the DSEIS evaluation continues.</p> <p>**</p> <p>Scoping comments**</p> <p>As part of the SEPA scoping comment period for the DSEIS, MBAKS provided comments last year. While we understand that some of our comments may be addressed when updated Multi-County Planning Policies are completed, most of the comments we provided were not addressed as part of the DSEIS. Please address our scoping comments as part of the response to comments and the FSEIS. A copy of the scoping letter dated March 16, 2018 is attached for reference. Please include this March letter into the record as part of the DSEIS comment period.</p>	
Master Builders Association of King and Snohomish Counties	2	<p>Preferred Alternative</p> <p>As PSRC evaluates the three SEPA alternatives (Stay the Course, Transit Focused Growth, and Reset Urban Growth), we hope that additional information, outlined below, can be incorporated in the SEPA process. This will ensure the selected alternative reflects where the region plans for job growth in the future and where growth is likely to occur, i.e. actually occurring. In reviewing the DSEIS, it appears that PSRC prefers the Transit Focused Growth Alternative. While this alternative has much to recommend, and MBAKS could potentially support some form of it, there are three areas where more information is needed before an alternative is selected.</p> <p>1. Incorporate actual growth patterns in at least one DSEIS alternative</p> <p>We request that at least one of the alternatives incorporate actual population growth since Vision 2040 was adopted. Currently, the Stay the Course alternative is based on Vision 2040 and both the Transit Focused and Reset Urban Growth alternatives appear to utilize the Stay the Course alternative as their baseline. However, regional by the DSEIS, the accuracy of the document will be undermined. The gap between planned and actual growth is compounding each year, and the preferred alternative must account for actual growth patterns.</p> <p>For example, in order to be consistent with Vision 2040, the 2015 Snohomish County Comprehensive Plan adopted the Vision 2040 allocated percentage of growth for its Unincorporated UGA. As of 2018, the population has nearly exceeded the 2035 growth target and will surpass it this year. In 2015, the City of Everett adopted a growth target consistent with Vision 2040 even though the city acknowledged it was unlikely to meet the target by 2035. Since 2011, the City of Everett has only accepted 9.2% of the population growth in the county, far below the 26% allocated under Vision 2040.</p>	The Reset Urban Growth alternative was designed to incorporate recent growth trends.
Master Builders Association of King and Snohomish Counties	3	<p>2. What does the Transit Focused Growth Alternative mean for the jobs-housing balance in the future?</p> <p>The Transit Focused Growth Alternative would focus almost all growth within areas where high-capacity transit currently exists or is planned for. Since high-capacity transit (HCT) is not planned for unless areas meet growth and density requirements, this alternative would essentially prevent any future extension of high-capacity transit outside areas where it already exists or is planned. While not explicitly stated within the DSEIS, it is the logical conclusion. Is it the intent of this alternative to limit HCT to existing or planned HCT?</p> <p>We are all concerned about the environmental impacts of the jobs/housing balance. People are moving farther from where they work to find housing they can afford. Bringing HCT to some of the jurisdictions labeled "cities and towns" may be appropriate in the future. Vision 2050 is the appropriate document to anticipate scenarios where it would be acceptable for "cities and towns" to exceed allocated percentages of growth under Vision in order to spur planning for HCT.</p>	Jobs-housing balance is discussed in the housing affected environment and impacts sections of the SEIS. The Transit Focused Growth alternative, Reset Urban Growth alternative, and Preferred Growth Alternative had similar levels of improvement to jobs-housing balance for subregional areas.
Master Builders Association of King and Snohomish Counties	4	<p>3. The DSEIS should clearly explain and define what "Consistency with Vision" means</p> <p>We would like to request that the DSEIS more clearly define what is meant by "consistency with Vision". Some questions to consider:</p> <ul style="list-style-type: none"> <li>• Are growth shares allocated by regional geography minimum goals (a 'floor') or maximum limits (a 'ceiling')?</li> <li>• When is it appropriate for a jurisdiction to vary from the Regional Growth Strategy (RGS) while maintaining consistency?</li> <li>• Are local governments required to adopt the Vision population growth percentage even when it is inconsistent with probable growth?</li> <li>• What are the environmental impacts of a local government adopting a growth target that it knows is not aligned to actual growth patterns?</li> <li>• How does that impact public facilities such as schools, planning for public utilities and infrastructure that rely on accurate comprehensive plans?</li> <li>• Under the Transit Focused Growth option, for example, could the growth for the "cities and towns" regional geographies exceed their overall percentage share of growth if doing so meant getting high-capacity transit in one of their cities?</li> <li>• How much flexibility do local governments have in considering and adapting to growth issues in their own jurisdictions?</li> </ul> <p>The less flexibility local governments have to adjust the more important it is that the preferred alternative accurately captures the growth that will actually occur between now and 2050.</p> <p>** Summary**</p> <p>We appreciate the time and work that went into preparing the DSEIS for comment. Please consider us resources on home building issues, and feel free to contact us with any questions. We look forward to working with PSRC staff and leadership as the FSEIS is prepared.</p> <p>Sincerely,</p> <p>Master Builders Association of King and Snohomish Counties</p> <p>Kat Sims</p> <p>Executive Director</p>	The Regional Growth Strategy chapter in VISION 2050 provides additional discussion of the target setting process and how targets relate to the Regional Growth Strategy.

Commenter	Comment Number	Comment Text	Response
Master Builders Association of King and Snohomish Counties	5	<p><b>**Summarized Comments on Vision 2050 DSEIS **</b></p> <p>Unincorporated UGAs</p> <p>The Stay the Course alternative is based on Vision 2040, not actual growth. One of the alternatives should incorporate existing growth patterns which, in some cases, differ significantly from Vision 2040.</p> <p>Characterization of growth near UGA boundaries</p> <p>It appears that PSRC prefers the Transit Focused Growth alternative over the Reset Urban Option. There are several areas in the DSEIS that indicate the Reset Urban Option would have a greater environmental impact than other alternatives. However, nothing in the DSEIS substantiates these statements. In fact, under GMA, land within urban growth boundaries can be developed. Existing policies and well-established land-use law protects environmentally critical areas. To imply that development in the unincorporated UGA will necessarily have a detrimental impact on the environment is to discount the many rules and regulations currently in place designed to protect the environment.</p>	The Reset Urban Growth alternative was designed to incorporate recent growth trends, and Stay the Course resets expectations for 2050 based on actual growth trends from 2000 - 2017. The SEIS provides an assessment of environmental impacts of future growth alternatives based on observed and modeled data.
Master Builders Association of King and Snohomish Counties	6	<p>Jobs/Housing balance: no discussion about commuting into the region</p> <p>When the supply of housing falls short of demand near employment centers, people must move farther from their jobs to find housing that they can afford. We encourage you to include in the DSEIS an estimate of the number of people commuting from outside the region, anticipated future numbers, and the environmental impacts of people commuting into the four-county region for work. Currently, none of the three alternatives discuss this issue, nor identify environmental impacts, or recommend mitigation to address these impacts.</p>	The SEIS and FEIS cover the impacts of long commutes such as more time in congestion, air pollution, and physical inactivity. This includes people commuting from outside the region. Additional content addressing this comment was added to the FEIS.
Master Builders Association of King and Snohomish Counties	7	<p>Information in the DSEIS must be more detailed to allow for more informed decisions</p> <p>We understand why much of the information in the DSEIS is presented at the regional level. However, without details on current conditions or data and statistics broken down at county and/or regional geography level, it is difficult to identify a preferred alternative. This is especially true of jobs and housing.</p> <ul style="list-style-type: none"> <li>• Providing regional/mean data disguises potentially major disparities between areas; King County is a relative outlier and likely skews the regional average. To select a preferred alternative, we need to understand what is happening at a more localized level. This would enable a gap analysis to clearly understand the current situation and what needs to happen to make Vision 2050 a reality.</li> <li>• Please provide information on impacts and mitigations that are specific to each county so local jurisdictions have the most accurate data for their comprehensive planning purposes.</li> </ul> <p>Jobs-housing balance analysis in sub-regions</p> <ul style="list-style-type: none"> <li>• Two alternatives shift 5% of the jobs outside of King County, but there is no mitigation or identified actions that would support that. In fact, it's possible such a shift could have negative impacts on the environment. The DSEIS should provide more information about how we will improve the jobs/housing balance and what the possible impacts might be.</li> <li>• Please show how the jobs-housing balance ratio has changed from Vision 2040 to today and what Vision 2050 seeks to achieve (including actions and mitigation) to improve the current ratio.</li> </ul> <p>Consistency with Vision</p> <p>Please clearly define and explain what it means for cities and counties to be consistent with the Regional Growth Strategy. On page 75, it states that "The Regional Growth Strategy provides regional guidance for the countywide growth target process." If the RGS is only "guidance" then local governments would not be required to adopt a growth target consistent with Vision to have their comprehensive plans certified by PSRC. Can counties and/or regional geographies deviate from their targets if they explain why?</p>	Given the regional scale of alternatives and the large variations in conditions among local areas, the level of detail for the alternatives and environmental analysis has been conducted at a broad programmatic scale. Analysis at the local level is beyond the scope of the Final SEIS. The SEIS includes data broken out at the county, and sometimes at the sub-county, level, including for jobs-housing balance. Additional detailed information is provided in the original Draft EIS and Final EIS. Local environmental analysis occurs as counties and cities update individual comprehensive plans and review projects. See previous response on target setting process.
Master Builders Association of King and Snohomish Counties	8	<p>Mitigation measures The mitigation measures identified in the Chapter 4 tables as currently written are the same for all three alternatives in each area of the four-county region. We ask that specific mitigation measures be provided for each alternative and for each region. If all mitigation measures are the same for each alternative, then it would make sense to expand bookends of what is being reviewed under SEPA. For example, two of the alternatives shift 5% of the jobs outside of the King County region. This is a logical place to discuss how this shift might happen and what mitigation measures might be applied. However, as written, these tables do not provide any explanation.</p>	The mitigation measures apply to all of the alternatives. Future local- and project-level environmental analysis will identify more specific mitigation measures.
Master Builders Association of King and Snohomish Counties	9	<p><b>**Unincorporated urban areas and public services/utilities **</b></p> <p>Please recognize how growth in urban unincorporated areas supports future annexation/incorporation. Public services sections consistently mention how cities/towns are providers of public services, but this is not always the case. Many cities and towns contract with county providers, and the overall region seems to be moving in the direction of region-wide public service and utility providers.</p>	The Public Services section of VISION 2050 discusses the many types of providers of public services, including special purpose districts.
Master Builders Association of King and Snohomish Counties (2018 comment resubmitted)	10	<p>Dear Paul,</p> <p>Thank you for the opportunity to comment on the Vision 2050 DSEIS. Attached please find MBAKS' comment letter, as well as the scoping comment letter MBAKS submitted last year.</p> <p>Let us know if you have questions or would like additional information.</p> <p>Best regards,</p> <p>Patricia</p> <p>March 16, 2018</p>	The scoping letter was reviewed prior to developing the Draft SEIS.

Commenter	Comment Number	Comment Text	Response
		<p>Erika Harris Senior Planner Puget Sound Regional Council 1011 Western Ave, Suite 500 Seattle, WA. 98104 RE: Vision 2050 – SEPA Scoping and project comments</p> <p>Dear Ms. Harris;</p> <p>On behalf of the 2,900-member companies of the Master Builders Association of King and Snohomish Counties (“MBAKS”), we appreciate the opportunity to provide the PSRC SEPA scoping comments for the Vision 2050 project update EIS. We ask that these comments be considered and entered into the record as part of the project scope and approach for the Vision 2050 update.</p> <p>As end users of Multi-County Planning Policies (MPPs), Countywide Planning Policies, local Comprehensive Plans and development regulations, MBAKS members have a unique perspective on the effectiveness of planning for growth in King and Snohomish counties. We look forward to working closely with PSRC staff in updating Vision 2040; we have direct experience that could help to better align policy goals with on-the ground results.</p> <p><b>** 1. Cities Need to be Accountable for Accommodating Growth Targets**</b> We see many jurisdictions pushing back on the rapid growth in the region through building moratoriums, restrictive tree retention regulations, wider buffers, higher impact fees, etc. Citizens want to “retain the character of their town” which leads to policies that restrict growth. This is contrary to PSRCs Vision that growth be focused in existing cities and towns, near job centers and transit, to lessen our impact on the environment (greenhouse gas emissions, sprawl, preserving natural areas, etc.). We support the PSRC process of allocating growth to cities, towns, and unincorporated UGAs to accommodate the growing population, however, how do we ensure these local jurisdictions will accommodate and accept the growth they plan for? How can PSRC help the region understand the growth and change that will be occurring in our region and that we must encourage growth within urban areas to ensure effective use (and conservation) of our resources? If growth does not occur as planned for within adopted policies, additional land will be needed to accommodate our region’s growing population. We ask that PSRC analyze this disconnect between growth targets and local development regulations under SEPA as part of the Vision update.</p> <p><b>** 2. A Fresh Look at UGAs**</b> One of the possible consequences of cities and towns not accepting growth targets and/or increasing density is that it pushes growth out, further from job and transportation centers. The fastest growing areas are cities and towns north, south, and east of the big cities like Seattle, Bellevue, Tacoma, and Everett. People are moving where they can afford (and find) a home they can buy, even if it’s far from where they work. This in part creates more pressure on our transportation system. If more condos were built closer to job centers, that could help; it would provide a viable home ownership opportunity for first time buyers, downsizers, and those who like the lifestyle. This could be part of a larger set of tools to ensure more housing for more people in the Vision 2050 planning time frame.</p> <p>Another option that we believe needs to be analyzed is developing policies that allow limited UGA expansions adjacent to established urban centers, while continuing the PSRC’s request to “bend the trend” to encourage urban growth in established cities. SEPA analysis and an economic study based on realistic population growth estimates would be important to determine whether current policies will result in growth being contained or pushed beyond the four-county region (e.g. people commuting to work in the PSRC planning region from Kittitas, Skagit, Whatcom, and Thurston Counties).</p> <p><b>** We ask that PSRC’s Vision 2040 Update SEPA review include review of areas inside the UGA, especially along the perimeter of a UGA, that for over 20 years have not built to urban densities**</b>. It is important to analyze these areas, as they are considered to have room for growth, yet are underperforming relative to other areas of the region. In some instances, it appears that the existence of a capital facility plan could be signaling future growth, but the growth is not occurring. It is possible that there are areas where UGA boundaries have created an unintended urban/rural divide, making it more difficult to accommodate/encourage growth in these areas. What policies can PSRC establish that would address these real-world issues that impact our ability to grow in alignment with the Regional Growth Strategy?</p> <p><b>** 3. Revise Growth allocation process**</b> We believe Vision 2040 growth targets did not adequately recognize where the population is growing and as a result, some cities (e.g. Everett) were allocated growth targets that they knew they wouldn’t meet. In other cases, cities were allocated growth targets that they knew they would exceed (e.g. Covington). Unfortunately, if the growth targets are not accurately reflecting reality, it can have real consequences, such as capital facility plans that either over or under plan for vital public facilities like sewer, water, transportation and schools.</p> <p>An example: Snohomish County and cities within the county adopted growth plans in 2015, knowing that the Regional Growth Strategy (RGS) targets were aspirational. However, in alignment with PSRC guidance, Everett (who notified PSRC that they would not meet their growth target) adopted a comprehensive plan, which included the overly optimistic growth numbers. PSRC reviewed and certified the plan. Why would PSRC “certify” plans that aren’t realistic or accurate? As of 2018, Everett has only received 9% of the total county growth when it should be closer to 25%. The gap has widened; Everett now needs to capture 33% of the county growth each year from now until 2035 to hit its target. Every year it falls short, the gap widens (see attached slide presentation from Snohomish County Tomorrow).</p> <p>We suggest two options for growth target setting be considered under SEPA and as part of the Vision 2040 update:</p> <p>Remove the Regional Growth Strategy allocation process and policies in Vision 2040 and utilize the process in the Growth Management Act (GMA), currently used by every GMA county and city outside of the PSRC planning region. The GMA provides guidance regarding focused growth in UGAs and protection of rural and resources lands. PSRC could support GMA guidance by creating incentives e.g. transportation funding, for jurisdictions that are designated Centers. Incentives would encourage urban growth and focus transportation dollars to the appropriate areas. Jurisdictions would need to accommodate their growth targets to be eligible for transportation dollars. This would focus jurisdictions on setting realistic targets that recognize existing conditions and plan for and implement regulations that “encourage” urban growth as the GMA prescribes. It also helps ensure that capital facility plans are accurate and reflect how our region will grow.</p>	

Commenter	Comment Number	Comment Text	Response
		<p>If PSRC opts to retain Regional Growth Strategy, it should reconcile it with the less prescriptive growth target process in the GMA. Further, the RGS should be revised to include policies that hold jurisdictions accountable for accepting growth targets and adopting policies that will enable new growth. Failure to accept additional growth should have consequences, i.e. transportation funding priority to those who grow and continue to enable growth through local land use policies and development regulations.</p> <p><b>**4. Environmental Impacts of adopting inaccurate targets</b> We ask that PSRC study the land use, transportation, capital facility and environmental impacts of the regional geographies growth allocation process within the Regional Growth Strategy. <b>**An accurate analysis of the impacts will help ensure that the growth allocation process accurately reflects reality and is not merely a set of aspirational goals.</b></p> <p>Growth targets adopted by individual jurisdictions may be slightly higher or lower when implemented over 20 years. However, the current growth allocation process can (and has) allowed jurisdictions to adopt unrealistic targets that do not reflect actual growth patterns. There are many issues that drive growth patterns, which should be recognized in the growth allocation process. Setting a growth target within a comprehensive plan does not necessarily translate to that target being met. We are concerned the current process does not adequately address the many reasons why jurisdictions adopt inaccurate growth targets and we believe this must be addressed in the Vision 2040 Update SEPA process.</p> <p><b>** 5. PSRC Role</b></p> <p>We ask that an analysis be completed under SEPA and as part of Vision 2050, which describes how PSRC's Vision update aligns with (and is not redundant) GMA requirements, to ensure Vision 2050 implements and does not expand PSRC authority, according to the interlocal agreement and by-laws. <b>** Of note is PSRC's comprehensive plan certification process, which occurs after GMA appeal periods have lapsed, which could result in significant issues for local governments.</b></p> <p>We have concerns that the structure of PSRC makes it challenging for local governments, interested groups, and citizens to meaningfully participate and have an impact, if they are not on one of the more visible boards or committees at PSRC. We appreciate that PSRC has undertaken significant public outreach as part of the Vision 2040 Update. However, there are approximately 23 boards and committees at PSRC (according to the PSRC website) and the types and range of projects PSRC engages in, continues to grow. While we appreciate PSRC's work in many areas, this may be the appropriate time to assess PSRC's role in the region.</p> <p><b>** 6. Regional differences</b></p> <p>We respectfully request that regional differences be reviewed under SEPA and as part of the Vision update, and policies be enacted that reflect these differences. <b>** Vision 2050 policies must recognize the considerable differences between King, Snohomish, Pierce and Kitsap counties and their cities. This includes differences in the housing markets and types of housing needed, the local economy and jobs, and economic forces that drive growth. While it is important for the Regional Growth Strategy to align growth policies within our region, Kitsap, King, Pierce and Snohomish counties may choose to implement policies in a way that is unique to their individual circumstances. What can PSRC do to recognize and acknowledge this in a way that maintains overall alignment with Vision 2050 goals?</b></p> <p><b>** 7. The overarching goal of Vision2050</b></p> <p>We ask that you review the Multicounty Planning Policies (MPPs) under SEPA, through the lens of local governments' ability to implement the MPP policies. <b>** This goes beyond local government's ability to implement the MPPs within policies in their Countywide Planning Policies or Comprehensive Plans. We are asking that you review how many of the policies within Vision are expected to be implemented within local government regulations. While PSRC jurisdictions are constantly updating policy documents, they often lack the time and resources to implement policies beyond those required by the GMA. In many jurisdictions, this has resulted in development regulations that are outdated, inefficient, and not aligned with the Regional Growth Strategy. Thus, the need for a Vision document that is concise and focused, keeping the end user in mind. If a policy doesn't have an implementable action and is already required through other planning requirements, it should be eliminated.</b></p> <p>A thorough review will help PSRC understand what is working, what changes need to be made, how to address conflicting policies, and remove redundant policies and requirements. In addition, we would like to see a clear, consistent definition of the many terms that are used in PSRC planning documents. Words such as: recognize, identify, protect and enhance, ensure, support, promote, address, tailor, encourage, achieve and sustain, expand, leverage, foster, improve, reduce, and protect could have many different meanings. What can PSRC do to create clarity and alignment in a brief and easily understood Vision?</p> <p><b>** Finally, we believe the SEPA process should not incorporate the new Centers Framework as a policy basis for the Vision update. <b>** The Vision update should analyze all options presented and then reframe how growth will be allocated. Centers will then need to align with the updated policies in Vision.</b></b></p> <p>As mentioned in our comment letter on the Centers Framework, we believe these projects are out of order; policies related to how growth should be allocated should have come before defining the Centers where the growth is directed to go. As such, the Centers Framework likely will need to be revised once Vision is updated.</p> <p>Please consider the MBAKS as partners and resources for the PSRC on anything concerning home building, housing and other related issues. We look forward to working with you. We appreciate the opportunity to comment on the scope of the EIS for the Vision 2050 update and we will continue to engage as the project moves forward.</p> <p>Sincerely,  Erich Armbruster President  Board of Directors  Master Builders Association of King and Snohomish Counties  cc: Josh Brown, Executive Director, Puget Sound Regional Council  [included -- 5 pages of graphs and tables -- see attached]</p>	

Commenter	Comment Number	Comment Text	Response
Master Builders Association of Pierce County	1	<p>Dear Mr. Brown,</p> <p>This letter is in reference to the Vision 2050 Draft Supplemental Environmental Impact Statement (SEIS) regarding the Puget Sound Region Council's (PSRC) plan for growth. On behalf of the Master Builders Association of Pierce County (MBA Pierce) and our 650 association members, thank you for your consideration to these comments.</p> <p>Introduction</p> <p>Because our Association is located within Pierce County and our members primarily conduct business here, our comments are rooted in the realities regarding growth that Pierce County, as a whole, is experiencing currently and will be experiencing in the future. MBA Pierce would also like to acknowledge that our members build the homes which the real estate market is currently demanding- that are being desired by homebuyers- which is largely single family homes. In context, we assert that it is important for the PSRC to recognize the products which consumers are pursuing. Therefore, due to geographical and market-based realities MBA Pierce faces, we advocate strongly for the Reset Urban Growth alternative among the three available options.</p> <p>Acknowledgement of Unincorporated Urban Growth Area Potential</p> <p>In Pierce County, there is bountiful Unincorporated Urban Growth Area (UUGA) that is not claimed by any jurisdiction. The decision to Reset Urban Growth is the only option PSRC provides which recognizes the potential to secure adequate housing and economic growth to the UUGA. It is imperative for PSRC to thoroughly understand the plans Pierce County has and projects already in the pipeline for its UUGA.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The Master Builders Association of Pierce County's preference for the Reset Urban Growth alternative has been acknowledged.
Master Builders Association of Pierce County	2	<p>Centers and Corridors Project</p> <p>Surely the letter Pierce County submits will describe the anticipated Centers and Corridors project in greater detail, but MBA Pierce has been involved with this endeavor since 2016 and we would like to emphasize its significance. This project Pierce County is pursuing seeks to establish high-density communities with employment and transportation options available for residents living within the areas of Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill.</p> <p>All of these areas mentioned are currently UUGA, but the intention to radically rezone these regions will allow for these areas to eventually incorporate as their own jurisdictions. An article in the Tacoma News Tribune summarizes the intent to guide these community plans to spur development; to bolster these UUGA locations to the point where it becomes economically feasible to incorporate. Pierce County planner, Jessica Gwilt, aptly describes the intent of the project in the article: "Part of (the plan) is establishing the ability for [these areas to incorporate] if they so choose... They get to determine their fate." 1</p> <p>The Centers and Corridors project is undoubtedly ambitious but has the potential to create several new incorporated areas within the Urban Growth boundaries in due time. The incorporation process would not be immediate and growth would need to occur in the UUGA until these communities are ready to transition. Understandably, this project is unique but it is important to note that the Stay the Course and Transit Focused Growth alternatives that the PSRC has put forth are limited in their assumptions of how much growth should occur in UUGA. Those options do not have the capacity to account for the innovation of potential endeavors like the one Pierce County is pursuing.</p>	The alternatives provided a range of options to study growth in the unincorporated urban growth area. Pierce County's request for an increased growth allocation to the Urban Unincorporated regional geography was considered in the development of the Regional Growth Strategy Preferred Alternative.
Master Builders Association of Pierce County	3	<p>Pierce County UUGA Pipeline of Projects</p> <p>Apart from the Centers and Corridors Project, there are several other planned communities in the pipeline in Pierce County's UUGA. Among the anticipated projects are the Tehaleh, Lipoma Firs, and Sunrise developments. All three of these developments are being built by our association's builder members and all three are anticipated to produce nearly 11,000 housing units combined. Smaller development projects, ranging from 100 to 850 units total over 3,000 units collectively. Finally, Pierce County calculates that there are over 3,300 units projected from plats with less than 100 lots. The total amount of anticipated projects in Pierce County's queue amounts to 17,353 housing units.2</p> <p>Understanding the volume of projects in UUGA that the County is anticipating has encouraged MBA Pierce to support the Reset Urban Growth option. Stay the Course and Transit Focus Growth alternatives would only allow the distribution of 13,200 and 16,400 housing units, respectively, in the UUGA. The Reset Urban Growth option, however, would allocate 43,200 housing units. Not only would this option be able to sufficiently accommodate all of the expected projects in the pipeline, but would also leave room for subsequent units in the areas within the Centers and Corridors project Pierce County is looking to stimulate.3</p> <p>1 Allison Needles, "New cities in Pierce County? Community Plans lay the groundwork for incorporation," Tacoma News Tribune, April 9, 2019, <a href="https://www.thenewstribune.com/news/local/article228812044.html">https://www.thenewstribune.com/news/local/article228812044.html</a>.</p> <p>2 Gwilt, Jessica. "Initial Staff Observations of Vision 2050 Draft SEIS." Presentation, Tacoma, WA, April 4, 2019.</p> <p>3 Ibid.</p>	Information and comment acknowledged. Information on pipeline projects informed the development of the Preferred Alternative.

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Master Builders Association of Pierce County	4	<p>Regional Growth Strategy vs. 2000-2017 Actual Development</p> <p>Before a 2050 strategy is drafted, MBA Pierce urges PSRC to acknowledge where Vision 2040 growth targets did not adequately recognize where the population is growing. Some cities were allocated growth targets that they knew they wouldn't meet and, in other instances, cities were allocated targets they knew would be surpassed. We assert that if the growth targets are not accurately reflecting reality, it can have real consequences. For example, capital facility plans for vital public facilities like sewer, water, transportation and schools cannot afford to be radically off in their estimates. Below is a graph provided by Pierce County Planning Staff comparing anticipated growth with the Vision 2040 allocations to the actual growth allocations that occurred from 2000 to 2017.</p> <p>Graph 4</p> <p>Pierce County Staff also provided graphs on what unit production would look like in the implementation of the three different options according to allocation percentages.</p> <p>1. Stay the Course Alternative</p> <p>Graph 5</p> <p>4 Ibid.</p> <p>5 Ibid.</p> <p>With the Stay the Course option, Tacoma noticeably needs to increase units produced. They were one of the cities in Pierce County that was given a growth target they could not meet. UUGA also needs to severely and unrealistically bend the trend currently happening. Given the data, this alternative is an unrealistic in Pierce County.</p> <p>2. Transit Focused Growth Alternative</p> <p>Graph 6</p> <p>Under the Transit Focused Growth option, UUGA has a more drastic need to bend the trend so that growth distributions are met. Tacoma has a lower goal to achieve than in the first alternative because high capacity transit communities acquire more anticipated growth. Due to the severe changes that still need to occur under this alternative, we deem it as equally unrealistic as the Stay the Course alternative.</p> <p>3. Reset Urban Growth Alternative</p> <p>Graph 7</p> <p>Under the Reset the Urban Growth option, UUGA still has to bend the trend somewhat and Tacoma is still tasked with finding ways to considerably increase production of housing units. The adjustments in reassessed allocations are not as radical as in the first two options and,</p> <p>6 Ibid.</p> <p>7 Ibid.</p> <p>though the allocation percentages provided by the PSRC in this option are still not reflective of the reality in regards to where homes are being built and desired in Pierce County, MBA Pierce asserts that the Reset Urban Growth option is the best of the three available alternatives.</p> <p>Conclusion</p> <p>From a standpoint of a nonprofit organization that represents homebuilders who build attainable housing in the Puget Sound Region, MBA Pierce affirms that the Reset Urban Growth alternative needs to be strongly considered. Though this option of the three might be the most difficult to pursue, we know it is the only alternative available that will realistically account for anticipated projects in Pierce County's pipeline as well as the eventual development that will occur in the areas of Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill through the Centers and Corridors project. The intention of this letter was to illustrate in detail of the reality of the growth that will occur in the UUGA because of these upcoming projects.</p> <p>MBA Pierce hopes that you recognize the significant differences between the needs of King, Snohomish, Pierce, and Kitsap counties and their cities. This includes differences in the housing markets and types of housing needed; anticipated growth allocations; the local economy and jobs; and economic forces that drive growth. Furthermore, we ask that you consider MBA Pierce as a resource for the PSRC on anything concerning home building, attainable housing, and other related issues. We look forward to working with you and thank you for the opportunity to comment on the scope of the Vision 2050 Draft SEIS. We will continue to participate as the project moves forward.</p> <p>Sincerely,          Jessie Gamble          Government Affairs Manager</p>	<p>The Reset Urban Growth alternative was designed to incorporate recent growth trends and was considered during the development process. The Regional Growth Strategy provides flexibility to respond to local circumstances in developing growth targets through different time periods, regional geographies, and guidance in the plan on aligning growth targets.</p>

Commenter	Comment Number	Comment Text	Response
Seattle King County Realtors	1	<p>"We are in Desperate Need of Housing Supply That Will Balance the Recent Job Growth our Region Has Experienced"</p> <p>Dear PSRC:</p> <p>We are writing to offer these comments of record on behalf of our 7,000+ REALTORS® here in King County regarding the "Scoping" for "Vision 2050." Seattle King County REALTORS® is the largest local REALTOR® Association in Washington.</p> <p>We submit these comments because our Region is in desperate need of Housing Supply that will balance the recent Job Growth our Region has experienced.</p> <p>We have great respect for those who serve the PSRC in the General Assembly, on the Executive Board, on the Operations Committee, the Transportation Policy Board, the Growth Management Policy Board, the Economic Development Board, the Regional Staff Committee and the PSRC staff.</p> <p>However, based on current realities it is time for the PSRC to change its approach. Since the state's Growth Management Act was adopted in 1990, its most glaring and debilitating deficiencies are in two areas of primary concern: Transportation and Housing. Addressing these two vital areas ought to be an overriding focus - for purposes of scoping the new Vision 2050.</p> <p>Respectfully, the PSRC has been active and well-intentioned, but has mostly failed in these two critically important areas. For that reason, an incremental approach that seeks to mostly "do some tuning" of Vision 2040 will be akin to trying to expand a home that is perched atop a crumbling foundation.</p> <p>It's not easy to press the "reset" button and start over, but there is enormous, sustained and continuing evidence to indicate that is precisely what is needed because of the importance of the growing challenges in the areas of Transportation and Housing.</p>	<p>The scoping letter was reviewed prior to developing the Draft SEIS. Housing was identified as a key issue for VISION 2050. See the information, policies, and actions in the Housing section of VISION 2050. Transportation information, policies, and actions have also been updated in VISION 2050.</p>
Seattle King County Realtors	2	<p>On transportation, the PSRC has expended money based on ideas of how the world "ought to be" instead of acknowledging the importance of dealing with what's actually happening. What's happening is that employers and families are making decisions about where to locate, live and move based on housing affordability and the transportation network. The failure of the PSRC to focus on congestion relief as a paramount responsibility now costs our region \$5 billion per year according to INRIX, Inc., which is considered the world leader in transportation analytics and connected car services. Its data and analytics on traffic, parking, and population movement are intended to help city planners and engineers make data-based decisions to prioritize spending, rather than decisions motivated by political agendas that impose enormous collateral damage and financial consequences on the region. In the last year alone, those consequences have moved us from 10th Worst Congestion in the Nation to 9th Worst Congestion in the Nation among large urban areas:</p> <p>2017 Rank (2016 Rank) City/Large Urban Area 2017 Peak Hours in Congestion (% of 2016 change) % of Total Drive Time in Congestion Total Cost Per Driver in 2017 Total Cost to the City in 2017</p> <p>9 (10) Seattle, WA 55 (0%) 12% \$ 1,853 \$5.0 Billion</p> <p>How does the \$5 billion in congestion costs for 2017 alone compare to the amount of federal transportation funding the PSRC allocated to transportation projects in 2017? We believe the answer to that question should be a direct reflection of the urgency for PSRC to prioritize congestion relief in its funding decisions and project approvals.</p> <p>The PSRC should begin making regionally-based decisions that are measured against mobility and congestion relief for the region (as opposed to geographically constrained multi-modal project preferences). Failing to do so will prompt employers and workers to make re-location decisions away from the region if they do not have regional mobility and congestion relief.</p> <p>We acknowledge that in the areas which will eventually be served decades from now by Link-Light-Rail there will be additional capacity. But it does not pass the "straight-faced" filter to say those plans amount to a workable solution to the region's transportation challenges, especially freight mobility and peak hours congestion relief.</p> <p>Extending a light rail line north, south and east will not be sufficient to address the transportation challenges that will accompany new regional growth that the Puget Sound Regional Council has said by 2050 will include "1.8 million more residents and 1.2 million more jobs." PSRC has announced that such growth "means population could reach 5.8 million (42% increase from today) while jobs top 3.4 million (36% increase from today)."</p> <p>Moreover, history has demonstrated pretty clearly that despite good intentions, light rail expansion cannot site and build parking garages at transit stations with capacities anywhere near what is required for the region to be able to rely on light rail to move a significant percentage of the region's workers to and from their jobs. Bussing those workers to transit stations (instead of drive and park) in order to transfer to light rail would likely also be problematic given the inadequacy of transit service in suburban areas as reflected in the red area is of this map prepared by Brandon Martin-Anderson of Conveyal. Martin-Anderson's cartography identifies the number of jobs accessible by public transit commute on any given weekday morning. Dark blue areas can reach over 500,000 jobs in an hour's transit time; dark red areas, fewer than 10,000. This is not simply an indicator of where jobs are located, it's a reflection that the areas in red are not well-served by transit that would get workers to a job within an hour.</p> <p>The data appear to indicate pretty clearly that this region is spending transportation dollars in a way that is moving the region towards becoming more congested than many other major urban areas in the nation, and leaving major portions of the region underserved in terms of access to functional and effective transportation solutions.</p>	<p>The scoping letter was reviewed prior to developing the Draft SEIS. The draft plan development included significant review of transportation.</p>

Seattle King County Realtors	3	<p>The other area where the PSRC has been an impediment to the success of GMA involves housing, most recently in connection with the agency's attempt to prevent small cities from accommodating additional housing needed to meet market demand.</p> <p>We simply do not have enough housing for everyone who needs a place to live. As regards the PSRC's Vision 2050, our concern in this regard is two-fold:</p> <p>First, for a healthy, stable real estate market we need 4 to 6 months of housing supply available to buyers.</p> <p>This graph shows the severe shortage we have experienced since the end of the recession, and an unprecedented run of five consecutive years with less than 2 months of supply in King County.</p> <p>[graph]</p> <p>When we do not have 4 to 6 months of housing available for buyers, workers expand their search area to neighboring cities and neighboring counties in order to find a place to live, and then commute longer distances to their job. In the process, they dramatically increase the region's carbon footprint and the environmental challenges to our region's quality of life.</p> <p>Shelter is necessity of life. Because the need for housing does not disappear simply because prices rise, economists characterize this necessity of life as having "inelastic demand" – meaning that when supply is insufficient to meet demand, prices rise. That is what continues to happen here.</p> <p>The following six introductory paragraphs to a March 6, 2018, story in the Seattle Times summarize what has been happening in the PSRC's four-county region:</p> <p>"Both Seattle and the Eastside again have smashed home-price records as the region's housing market continues to be brutal for homebuyers even before the peak spring season kicks off.</p> <p>New monthly home-sales data released Tuesday showed Seattle's median single-family-home price hit \$777,000 in February, \$20,000 more than the previous all-time high set just a month prior.</p> <p>_On the Eastside, the median cost of a house was \$950,000, or \$12,000 more than the peak price from two months ago.</p> <p>And yet there is little escape for people priced out of the region's most expensive markets.</p> <p>_Home prices grew at least 15?percent in every county in the Puget Sound region, according to the _Northwest Multiple Listing Service.</p> <p>Both Snohomish and Pierce counties set a record high for home values, even though prices historically have lagged in the winter."</p> <p><a href="https://www.seattletimes.com/business/real-estate/new-home-price-records-777000-in-seattle-950000-on-the-eastside/">https://www.seattletimes.com/business/real-estate/new-home-price-records-777000-in-seattle-950000-on-the-eastside/</a></p> <p>As REALTORS® we are extremely concerned that the lack of Housing Supply to meet the Actual Market Demand for Housing that is associated with job growth - both here in King County and regionally - is producing barriers to housing the region's workforce unlike anything we have seen in more than three decades.</p> <p>To further illustrate the reason for our concern, we would point the PSRC to the following examples of price increases in February data released on March 6th by the Northwest Multiple Listing Service (NWMLS):</p> <p>Single-family home prices (median "SOLD" prices) were up year-over-year:</p> <ul style="list-style-type: none"> <li>40.78 % in the Kirkland Bridle Trails area</li> <li>34.31 % in the SODO/Beacon Hill area</li> <li>31.25 % in the Juanita/Woodinville area</li> <li>29.60 % on Mercer Island</li> <li>28.88 % in the West Seattle area</li> </ul> <p>Condominium prices (median "SOLD" prices) were up year-over-year:</p> <ul style="list-style-type: none"> <li>158.36 % in the Richmond Beach/Shoreline area</li> <li>93.75 % in the Bellevue/East area</li> <li>63.85 % in the Skyway area</li> <li>51.12 % in the West Seattle area</li> <li>44.29 % in the Redmond/Carnation area</li> <li>40.91 % in the Jovita/West Hill area</li> <li>38.19 % in the Lake Forest Park area</li> <li>30.43 % in the North Seattle area</li> <li>29.34 % in the Auburn area</li> </ul> <p>Second, efforts to restrict the creation of additional housing units are not well-advised and move the region farther from - instead of closer to - achieving the GMA Housing Goal in RCW 36.70A.020 (4) which focuses upon a diverse supply of housing that is affordable "to all economic segments of the population of this state."</p> <p>If PSRC is going to include housing within the scope of Vision 2050 - particularly as regards the certification of local comprehensive plans - the PSRC needs to make a sea-shift departure from its past practice.</p> <p>Specifically, the PSRC should base its analysis of housing (including planning for, constructing and augmenting the supply of housing) upon a timely analysis - updated at least biannually - of whether or not housing is affordable to all economic segments of the population in the county, consistent with the Housing Goal in GMA.</p> <p>As a "gateway metric" to such bi-annual analysis, the PSRC should ask two questions, and evaluate the answers to the questions on a county-by-county basis:</p> <p>During the most recent 24 months, could a household earning the county-wide median household income afford the median "sold" purchase price for houses and condos combined using FHA minimum down, maximum-base loan amount financing?</p>	The scoping letter was reviewed prior to developing the Draft SEIS. Housing was addressed as a key issue in the plan update.
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Commenter	Comment Number	Comment Text	Response
		<p>During the most recent 24 months, could a household earning 80% of the county-wide median household income afford to rent the median-priced apartment without having to pay more than 30% of monthly household income for monthly rent?</p> <p>If the answer to either of those questions is "No" the PSRC should respond to the failure in that county by prioritizing both transportation project approvals and financial support for projects based upon:</p> <p>How aggressively the respective city or county is modifying its comprehensive plan, zoned densities and development regulations in ways likely to improve the imbalance between the supply of housing and the demand for housing. Such changes could be evaluated by examining the percentage increase in the number of housing units that will be facilitated above and beyond the jurisdiction's CPP total housing target, especially since the PSRC eventually acknowledged in 2017 that those housing targets are minimums, not maximums.</p> <p>The likelihood that the jurisdiction's modifications to its comprehensive plan, zoned densities and development regulations will actually be "achieved on the ground" and improve the likelihood the county will move significantly closer to achieving the Housing Goal in GMA.</p> <p>The degree to which the project (for which PSRC-controlled funding is sought) will serve the housing units likely to result from the jurisdiction's modifications to its comprehensive plan, zoned densities and development regulations.</p> <p>The geographic area served by the PSRC continues to be plagued by worsening congestion that is now "9th Worst in the Nation" among large urban areas.</p> <p>The lack of housing opportunities to meet the needs of the workforce in PSRC's four-county region continues to create multi-county sprawl, especially in connection with workers commuting to work across county lines. The cost of transportation infrastructure required to address the multi-county sprawl created by the lack of housing means transportation solutions become much more complicated and expensive, not just for government, but also for workers least able to afford those commutes.</p> <p>This graph by Zillow illustrates that those least-able to afford housing are also the hardest hit by the disconnect between plans for housing and transportation, and the reality on the ground:</p> <p>Seattle workers earning less than \$15,000 annually must now commute an average of 21.4 miles to their job, while Seattle workers earning more than \$40,000 annually have commutes which average less than half that distance.</p> <p>The lack of housing opportunities has placed the American Dream at untenable risk in the PSRC's four-county region.</p> <p>Just last month, on February 27th, the Seattle Times reported that for the 16th month in a row Seattle led the nation in home price increases, a distinction that has not occurred since the turn-of-the-century:</p> <p>"Seattle-area home market was nation's hottest for 2017 — and cheaper areas from Bellingham to Spokane weren't far behind</p> <p>Single-family-home prices for the metro area that spans from Tacoma to Everett grew 12.7 percent in December from the previous year, according to the monthly Case-Shiller home price index, released Tuesday.</p> <p>It was the 16th month in a row that Seattle led the nation in home-price increases. That extends a local record and is the longest streak in the nation since the dot-com bubble in San Francisco around the turn of the century."</p> <p><a href="https://www.seattletimes.com/business/real-estate/seattle-area-home-market-was-nations-hottest-for-2017/">https://www.seattletimes.com/business/real-estate/seattle-area-home-market-was-nations-hottest-for-2017/</a></p> <p>This situation will also likely affect the potential for the PSRC's Economic Development Board to be successful in recruiting and retaining high quality employers. We believe it is unrealistic to think most local employers can pay wages high enough to allow their workers to be able to afford the region's escalating home prices and rents, and still have any hope of maintaining control of their cost structures in a way that will allow them to remain competitive in regional, national and international markets.</p>	
Seattle King County Realtors	4	<p>Conclusion</p> <p>Respectfully, we request that rather than engaging in an incremental adjustment to the Vision 2040 policy approaches for transportation and housing that have failed the Puget Sound Region, it is time for the PSRC to change its approach. The greatest challenges facing our region (within the purview of PSRC) are transportation congestion, and lack of housing supply. As PSRC scopes Vision 2050 it should acknowledge the worsening congestion that has reached increasingly higher levels of national note, and the lack of housing supply that continues to produce "hottest in the nation" housing price increases. That congestion - and the housing crisis which both King County and the city of Seattle last year formally declared an official "emergency" - continue to be the irrefutable "reality on the ground."</p> <p>PSRC should hit the reset button, and develop Vision 2050 policies, assessments, accountability measures and project approvals/funding prioritization tied to the kinds of quantitative metrics we have suggested. We believe that failure to do so will continue to produce the kinds of enormous collateral damage that is reflected in both governmental and industry expert data.</p> <p>Thank you for the opportunity to submit these scoping comments for Vision 2050.</p> <p>Sincerely, SEATTLE KING COUNTY REALTORS®</p>	See above responses to commenter. The scoping letter was reviewed prior to developing the Draft SEIS, and housing and transportation issues are addressed through goals, policies, and actions in VISION 2050.

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Seattle King County Realtors	5	We are resubmitting our previous comments (attached) to renew our concerns regarding the VISION 2050 Growth Strategies. In addition, we wish to also highlight two concerns: What is the plan to effectuate redistribution of 5 percent of the jobs? A vision without a plan for implementation isn't worth the paper it's written on and this has been, and continues to be, very expensive fancifulness.	The many policies and actions in VISION 2050 implement the Regional Growth Strategy.
Seattle King County Realtors	6	The first option to "stay the course" is based on 2012 data, not the more recent 2017 data from OFM. We fail to see how this complies with the Growth Management Act. Thank you for allowing us the opportunity to comment.	Comment noted. The technical appendices for both the VISION 2040 FEIS and VISION 2050 SEIS describe the data and technical assumptions involved in developing the alternatives.
City of Arlington	1	Dear Ms. Harris, The City of Arlington appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050. The City of Arlington agrees with the transit focused growth alternative, however, there could be some additional metrics to gauge growth along Transit-Oriented Development (TOD) corridors.	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for the Transit Focused Growth alternative has been acknowledged.
City of Arlington	2	The ability for the City of Arlington to create TOD in the near future will be focused on Bus Rapid Transit (BRT), due to the long-range availability of Light Rail in our area. To better serve our community, as well as other municipalities of similar size in the region, the City feels there is a need for a series of metrics that could help to support BRT since the average cost per mile for BRT system that would serve Arlington is \$2,600,000 per mile, while the average light-rail project costs \$201,600,000 per mile, based on the Federal Transportation Administration's data. Creating a metric that can compare the cost per mile of projects, as well as predicted growth along the corridors as determinations for future transit funding, enables projects that are financially sustainable and are able to best serve all communities in the Puget Sound region. In addition to the cost of the projects, the average service provided by both BRT, 60 rides per 10 minute period, and Light Rail, 400 rides per 20 minute period, requires two different requirements for density. The establishment of a metric that is able to also compare density required for services for transit based on BRT versus Light Rail, would also help to provide for the equal distribution of funds to all types of densities and facilities. The City of Arlington is supportive of the transit focused growth alternative, and certainly is in agreement with our comprehensive plan, but would like to see a way for there to be a guarantee that funding and density requirements are proportional for BRT as well as Light Rail in the future. Thank you for the opportunity to comment in advance of determining a preferred alternative for VISION 2050. Sincerely, Barbara Tolbert, Mayor City of Arlington	PSRC will continue to review metrics to measure growth and transportation in the region.
City of Auburn	1	Dear PSRC: The City of Auburn appreciates the opportunity to provide comments on the Draft SEIS prepared by the Puget Sound Regional Council for the Vision 2050 update. The City understands that planning for the regional growth spread across four counties and 80 cities is a significant undertaking and poses a number of challenges. The municipalities represented in this plan range in size from a few hundred to nearly three-quarters of a million people and represent a mix of urban and rural areas, as well as a variety of transit needs and current access. The City of Auburn holds a strong commitment to PSRC's vision for the vibrant, sustainable growth of our region, a fact underlined by our long-standing support of previous Vision strategies and by the continued certification of our own Comprehensive Plans. In the last 20 years, Auburn has transformed its downtown core into a transit-oriented community with the addition of a Sounder station, commuter rail line, a 636-stall transit parking garage and more than 1,000 multifamily dwelling units within a quarter mile of the transit center. Work is also underway for a second garage that will bring more than 500 additional stalls on-line within the next four years. Draft SEIS Alternative Preference As a Core City, Auburn generally supports the principles of the Transit Focused Growth alternative. We believe that this approach is in alignment with City of Auburn objectives and that it is the appropriate aspirational objective for the four-county region. As this region grapples with significant population growth and employment over the next 20+ years, it is essential that we implement policies, processes, incentives and other measures that encourage more efficient use of existing urban growth areas. This approach mitigates the environmental, economic and social impacts associated with sprawl.	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for the Transit Focused Growth alternative has been acknowledged.
City of Auburn	2	Comments on Draft SEIS Preferred Alternative The City of Auburn holds a unique geographic position, located partially within King County and partially within Pierce County. It is also divided by both broader urban areas to the north, west and south, and abrupt urban/rural demarcation to the east. These positional characteristics result in portions of Auburn that are well suited to prepare for, and embrace, a Transit Focused Growth alternative and other portions that are many decades away from being able to support high density, transit oriented development. Despite the presence of a high-capacity commuter rail line, a regionally significant commuter transit station, and a significant existing and planned supply of commuter parking, there is a lack of local transit services to the high-capacity Auburn Sounder facility. Most residents of Auburn cannot use local transit to get to the Sounder station. This results in three outcomes: (a) fewer people utilize Sounder trains, (b) individuals who do use Sounder trains must drive their vehicle to the station, adding to local congestion and the need for additional expensive parking facilities, and (c) lower income neighborhoods whose residents cannot afford a vehicle do not have access to the commuter line, leading to community inequity. The success of the Transit Focused Growth alternative hinges directly on robust local transit service. While this alternative places heavy emphasis on population and employment growth in close proximity to high capacity transit centers, there remain many opportunities in our community to improve connections for residents that live	The importance and challenge of connecting the community via local transit service is acknowledged.

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		beyond a walkable distance to regional transit service. In addition, Auburn's ability to successfully contribute to a Transit Focused Growth alternative is ultimately contingent on service levels that are determined by outside transit providers.	
City of Auburn	3	<p>Auburn believes that establishing land use policies targeted at greater density within close proximity to high-capacity transit is an important priority. However, such density increases would pose substantial challenges within a developed 125-year-old downtown core and would require significant financial investment. Auburn's success with increased density and transit-oriented development in recent years has come as a result of publicly funded multi-million dollar upgrades to portions of its utility infrastructure. Additional publicly funded multi-million dollar investments in utility infrastructure upgrades would be necessary in order for Auburn, and other communities, to continue achieving these types of regional objectives.</p> <p>Area-wide upgrades in stormwater, water supply, sewer, fireflow, and power are a critical component of such density increases. However, many of these systems were developed decades ago to serve the lower density demands of the time. Creating systems designed to meet increased residential density is not simply a matter of developer improvements to individual properties, it is a matter of carrying out full utility system upgrades that can serve the increased demand as a whole. Beyond stressors to the current utility infrastructure, such increased density would require upgrades to mobility and transportation systems, the addition of new public park and gathering spaces, and expanded police and fire services.</p> <p>Expansion of these types of services and systems are not fully funded through taxes and one time permit and impact fees. The only way to fully implement the Transit Focused Growth scenario is to fully fund investments in utility upgrades and the expansion of park and public safety services.</p>	The challenge of planning and funding needed public services and utilities is noted.
City of Auburn	4	<p>The Transit Focused Growth alternative assumes that 75% of the region's population and employment growth will occur within 1/4 to 1/2 mile of a high-capacity transit station and that this growth would occur primarily in Metropolitan Cities, Core Cities, and HCT Communities. Auburn understands that this is a regional aspiration, however it is important to note that significant capacity and growth analysis needs to occur within each of these communities in order to understand whether that goal can realistically be met.</p> <p>As a historic community that is already fully built out within proximity of the existing high capacity transit station, it will be difficult for the City to force high density development to occur within these areas. Some parcels are occupied by schools that are not going to be redeveloped, some parcels are occupied with transit garages (who do not require housing to be built into their structures and are not required to pay traffic impact fees), some areas are occupied with clusters of 80-year-old homes where a developer will be faced with the complexity of buying multiple homes and aggregating lots for redevelopment, and some parcels are occupied with well-established grocery stores and hospitals. Opportunities to create high density housing exists at all of these locations, but the pace at which it happens will be difficult to predict, hard to force, and filled with complexity along the way. Redevelopment that is considered economically viable in Seattle, Tacoma, or Bellevue is not economically viable in Auburn and many other communities. Vision 2050 needs to reflect this reality.</p>	VISION 2050 celebrates the diversity of the region and upholds the variety of places as a strength. Target setting at the countywide level will provide the opportunity to consider the unique circumstances of each jurisdiction, including development capacity.
City of Auburn	5	<p>Vision 2050 applies to the full span of the four-county region. The City of Auburn believes that the Transit Focused Growth alternative is the appropriate approach for the urban area that stretches from Everett to Tacoma and from Bremerton to Bellevue, but it will be a significant challenge to successfully implement this alternative in areas that extend beyond this large urban area. As noted in comment #2 above, although Auburn is positioned within the larger Everett/Seattle/Tacoma urban area, it will be difficult to see the Transit Focused Growth objectives extend throughout our community. While the City of Auburn will appreciate being the beneficiary of future transportation investments given the presence of a high-capacity transit center within our community, this alternative has the potential to hinder other future regional infrastructure investments in other communities or to devalue their previous multidecade planning investments. Vision 2050 should not disadvantage other communities or negate the work and investment that those communities have completed in their efforts to successfully comply with GMA.</p> <p>Thank you for the opportunity to comment on the Draft SEIS for Vision 2050. The City of Auburn looks forward to future regional collaboration and is appreciative of the time and energy that PSRC has committed to this effort.</p> <p>Sincerely, Nancy Backus Mayor</p>	Concur that previous multidecade planning investments should not be devalued.
City of Bellevue	1	<p>Re: VISION 2050 Draft Supplemental EIS Comments</p> <p>Mr. Brown,</p> <p>This letter represents the City of Bellevue's comments on the VISION 2050 Draft Supplemental Environmental Impact Statement. Bellevue supports the Transit Focused Growth Strategy as the best alternative to support and encourage vibrant urban centers, provide opportunities for housing and jobs near transit hub and protect the environment.</p> <p>The Transit Focused Growth Strategy is the most closely aligned of the three alternatives to Bellevue's present and future planned growth pattern, for the following reasons:</p> <p>The City's current growth strategy adopted in the City's Comprehensive Plan is predicated on locating most of the City's future growth into mixed use centers which include Downtown, Bel Red, Wilburton Commercial District, Factoria and Eastgate.</p> <p>The City has adopted policies in its comprehensive plan which reinforce this growth strategy, including the land use, transportation and housing elements.</p> <p>Large investments in public infrastructure and services are underway or planned that reinforce a transit focused growth strategy. The Eastlink light rail system is the most notable and will link the Bellevue Downtown and Redmond Overlake growth centers to other centers throughout the region. Another is the expansion of bus rapid transit services in and through Bellevue on 1-405 as included in Sound Transit 3 (ST3), the ballot measure approved in 2016 to expand high capacity transit and light rail.</p> <p>Many of the Eastlink light rail station areas are planned as mixed-use, transit-oriented development areas, again reinforcing a transit focused growth scenario. The stations include East Main, Downtown, Wilburton, and two stations in the Bel-Red District (Spring District and 130th stations).</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for the Transit Focused Growth alternative has been acknowledged. PSRC staff can provide information on regional growth center designation criteria and process. Also see: <a href="https://www.psrc.org/centers">https://www.psrc.org/centers</a> .

Commenter	Comment Number	Comment Text	Response
		<p>The light rail expansion projects that will be funded by ST3 include a future light rail line that will connect two other Bellevue mixed-use centers- Eastgate and Factoria- to the regional system.</p> <p>The Transit Focused Growth alternative directs future growth into more compact, dense development patterns. This has advantages for Bellevue and the region, including the following:</p> <ul style="list-style-type: none"> <li>-It leverages the investment in the Eastlink light rail system by increasing the value of the land around stations. This in turn benefits the local economy.</li> <li>-It uses less land to accommodate future population and potentially reduces development pressures and impacts on regionally significant habitat and other ecosystems.</li> <li>-It yields less impervious surface than other growth scenarios which is a benefit for controlling stormwater runoff.</li> <li>-More people will have access to transit which helps reduce greenhouse gas emissions.</li> <li>-Overall transit focused development supports more accessibility to parks and recreation. Multi-modal trails, such as the Eastside Rail Corridor, will connect Downtown, Bel-Red, Wilburton Commercial District and Factoria and the corresponding transit stations.</li> <li>-The transit focused development scenario concentrates development around transit and increases opportunities for people to walk and bike, which can improve public health.</li> <li>-With increased population comes a greater need for affordable housing. The transit focused strategy envisions more density around transit stations but greater density, on its own, doesn't guarantee more affordable housing. The transit focused strategy combined with an affordable housing strategy will allow for housing in a range of affordability levels that will serve our work force.</li> <li>-Transit focused growth improves the jobs-housing balance more than the Stay the Course option, which benefits Bellevue.</li> <li>-Downtown is a designated regional activity center. The transit focused growth scenario with its focused growth in transit centers may help areas such as Bel-Red (singularly or in a combination with the Wilburton Commercial District) become eligible for the region's urban growth center designation.</li> </ul>	
City of Bellevue	2	<p>Growth will bring challenges in any of the scenarios and continued regional collaboration will be required to mitigate the potential negative impacts of compact urban growth. Examples of these challenges include increasing land and development costs (such as for parks and affordable housing), environmental impacts, and ensuring coordinated transportation and land use planning. An inadequate transportation system can limit growth. Without more investments and better transportation options, we will not be able to support the growth projections for the region.</p> <p>Bellevue supports proactive efforts and implementing smart technology to address the challenges that comes with growth. Smart transportation technology and public/private partnerships, such as autonomous, connected, electric and shared vehicles, are already in use and will only grow, influencing growth patterns and supporting needed multi-modal solutions.</p> <p>The City will continue to work with the PSRC to develop policies and actions to support VISION 2050 as well as continue to work with regional partners to mitigate the negative impacts of growth. Thank you for the opportunity to provide comment. If you have questions or need additional information, please contact Terry Cullen, Bellevue's Comprehensive Planning Manager, at 425-452-4070.</p> <p>Sincerely,  Mayor John Chelminiak  City of Bellevue</p>	A Technology Briefing Paper prepared for VISION 2050 discusses the changes in transportation technology. Policies and actions in the Transportation section of VISION 2050 call for continued work to address technology.
City of Bonney Lake	1	<p>VISION 2050 has the potential to be an effective regional growth planning document that would provide meaningful guidance to facilitate coordination between the counties and cities in the Puget Sound Region. However, this guidance must be balanced against the latitude given to local jurisdictions under the growth management framework in the state of Washington, which is bottom up approach, not a top down approach, to growth management planning. This bottom up approach to growth management planning is reflected in the Puget Sound Regional Council's (PSRC) 1993 Interlocal Agreement Mission Statement which provides that PSRC will adopt and maintain goals and policies"... based on local comprehensive plans of jurisdictions within the region."</p> <p>The focus of the Draft Supplemental Environment Impact Statement (DSEIS) is on the Regional Growth Strategy (RGS)- the desired growth pattern within the 4-county region. At the local level, the RGS serves as guidance for the establishment of twenty (20) year population and housing targets. The City recognizes the benefits and supports a growth pattern that emphasizes compact development, supports transit, and the Regional Centers Framework. However, the City cannot acquiesce its authority or responsibility under the Growth Management Act (GMA) to plan for the actual growth anticipated in the City. Growth targets must be based on real-world circumstances and recognize the outside forces that cannot be controlled through local policy (e.g. housing price, housing preference, etc.).</p> <p>Recognizing the bottom up approach envisioned in the GMA and the desire for a growth pattern that achieves the larger regional objectives, the RGS selected must be one which can be reasonably achieved by all jurisdictions. While the City will work with PSRC and the member jurisdictions to achieve the objectives of the RGS, the City must emphasize that whatever RGS alternative is chosen, it is guidance; not a mandate. PSRC staff has repeatedly stated in various forums that VISION 2050 is intended to provide guidance and will be flexible. The City believes that mandating specific growth targets is inconsistent with the GMA and the statements made by PSRC staff. Additionally, the City is concerned that the growth targets will usurp a city's right to determine the amount of growth that it can adequately accommodate. As provided in the Central Puget Sound Growth Management Hearings Board's Final Decision and Order in West Seattle Defense Fund v. City of Seattle:</p> <p>"... allowing a city to plan for even more growth than has been allocated to it by the county bolsters the Act's first two planning goals by encouraging that city to accept in its comprehensive plan as much growth as it determines it can adequately accommodate ..."</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The Regional Growth Strategy provides a framework for target setting at the countywide level. Target setting at the countywide level will provide the opportunity to consider the unique circumstances of each jurisdiction. The development of the Regional Growth Strategy took into consideration comments from Pierce County on growth allocations.

Commenter	Comment Number	Comment Text	Response
City of Bonney Lake	2	The City can support a preferred alternative that encourages growth to occur adjacent to transit and within centers to take advantage of the large investment the region is making in mass transit over the next two decades. However, the final alternative selected must recognize realistic growth expectations and the public and private investments that have been made based on the existing urban growth area boundaries.	Comment acknowledged.
City of Bonney Lake	3	The City is not going to entertain actions, i.e. down-zoning, that will significantly reduce the ability of these public and private investments being realized. Similarly, the City cannot ignore the significant number of vested pipeline projects and work the City is doing to implement the objectives of the GMA.  The City does support PSRC's effort to combine certain unincorporated urban areas within other geographies in the RGS as a way of incorporating reality into the planning for the region (e.g. considering the Tacoma PAA is within the HTC Communities Geography because of a Bus Rapid Transit (BRT) route). The City believes that as part of the selected alternative it would be just as logical to include other unincorporated PAAs and Potential Incorporation Areas (PIA) under the "Core" or "Cities and Towns" Geographies because these areas are planned to be annexed or to become cities. This would ensure that the planning would support the envisioned future versus using up capacity at lower levels that could hinder annexation or incorporation. The region must maximize capacity within the existing urban growth area to lessen the need for expansion in the future. It would be contrary to the GMA to limit growth within the established UGA, once the areas are built at a lower density the capacity is gone and this may result in the need to expand the UGA in the future.	Modelling of the alternatives takes into account land use designations in place in local comprehensive plans. The VISION 2050 alternatives do not require or promote down-zoning in urban areas. The Regional Growth Strategy Preferred Alternative makes some adjustments to regional geographies to address comments from counties.
City of Bonney Lake	4	It is questionable if the growth allocations associated with the Stay the Course and Transit Focused Growth alternatives can be realistically achieved throughout the region. To achieve either of these RGS targets some jurisdictions and "Geographies" will need to grow at rates never experienced in the past 10 years, while other jurisdictions will have to take actions to significantly restrict growth. If PSRC is committed to mandating these unrealistic growth rates, how will jurisdictions that are not achieving the higher rates be evaluated during the next comprehensive plan update? Additionally, as noted in the letter from the City of Lakewood, the "Transit Focused Growth" alternative has an explicit goal for seventy-five percent (75%) of the region's population and employment growth to occur within regional growth centers and in close proximity to high-capacity transit, this may be unrealistic. As noted in Lakewood's letter the more realistic goal is closer to sixty percent (60%).	Targets are set through the countywide process, not the Regional Growth Strategy. Certification of comprehensive plans is based on planning for adopted growth targets, rather than achievement of those targets. Based on feedback on the Draft SEIS alternatives, for the Preferred Growth Alternative, the regionwide goal for population growth in regional growth centers and areas within walking distance of high-capacity transit was set at 65%.
City of Bonney Lake	5	If the region is truly committed to achieving more growth in proximity to transit, one mitigation measure that must be included in the Final SEIS is a commitment to working with the state legislature to make it easier for jurisdictions within the urban growth area to either join an existing transit district or create a transit district. PSRC must use its legislative influence to support legislation that addresses this fundamental flaw in the objective of having housing supported by transit.	An action in the Regional Collaboration chapter was added to relay the goals and objectives of VISION 2050 to state agencies and the Legislature, in order to promote changes in state law and funding to best advance VISION 2050. The boards could consider supporting this legislative request.
City of Bonney Lake	6	The growth alternative selected must address the job-housing balances in a more realistic way. In order to address the current imbalance that is contributing to increasing commute times, more employment is needed in the South Sound. We, as a region, need to work together to identify what steps can be taken to make a more equitable distribution of jobs a reality. This is a complex issue that revolves around such issues as wages and housing prices at the sub-regional level, i.e. can a person afford to live where they work.	VISION 2050 has a new action to provide regional support for local government economic development planning.
City of Bonney Lake	7	The City also has some concerns with the manner in which the environmental impacts are summarized in the table labeled "Summary Comparison of Alternatives Impacts" (Table E-3). It appears that the table was developed to skew the decision toward a pre-determined outcome instead of actually analyzing the impacts. The Transit Focused Growth Alternative and Reset Urban Growth Alternative are evaluated as having a negative or positive impact compared to the theoretical outcomes of VISION 2040. In taking a closer look at the data behind the colored arrows on Table ES-3, the difference in the percentages is not significant, especially considering a margin of error factor; however the DSEIS appears to convey that these small, insignificant differences are significant in order to guide the reader to the desired outcome. Examples include "How Close would Growth be to Rural and Resource Lands," "How Much would the Average Person Drive," and "What would be the Contribution to Climate Change" criteria. Additionally, some of the criterion appear to be biased towards the writer's preference. As an example, the analysis infers that multi-family is preferred over single-family specific to "Visual Quality." This is extremely subjective. A number of City residents would argue that high-density, multi family development can be more visually intrusive and impactful.	PSRC's models, as utilized for analyzing the VISION 2050 alternatives, are not currently structured to produce common statistical measures of significance or margins of error. The models have however been tested and validated against real world estimates such that they provide reasonable confidence in the directionality of model results compared between two or more scenarios. A protocol based on evaluating both the absolute and percentage difference between modeled indicators was used to determine whether values are distinct, slightly distinct, or essentially similar.
City of Bonney Lake	8	PSRC's decision to use VISION 2040 as the baseline to determine if the alternatives have positive or negative impacts is also concerning to the City. According to Appendix E, which includes the Regional Growth Strategy Background Paper, it is evident that the VISION 2040 growth patterns have not been realized. To determine the impacts of the alternatives, including the "Stay the Course Alternative", PSRC must look at the real baseline data (2014 and 2017) provided in Appendix B - Supporting Data for Analysis and compare all three alternatives to the actual development patterns that have occurred since the initial adoption of VISION 2040. This is important information that is buried in the document, it should be more central in the analysis.  If additional information is needed, please contact the City's staff lead: Jason Sullivan- Planning and Building Supervisor. He can be reached by phone at (253) 447-4355 or by email at <a href="mailto:sullivanj@ci.bonney-lake.wa.us">sullivanj@ci.bonney-lake.wa.us</a> .  Sincerely, Neil Johnson Jr. Mayor City of Bonney Lake	For alternatives analysis, impacts for the horizon year (2050) need to be compared to the No Action alternative and action alternatives. Since this is a nonproject action, the policy direction of the current regional plan was extended to 2050.
City of Bothell	1	Dear Ms. Harris,  The City of Bothell appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050. The City of Bothell has been a long-time participant in these regional planning efforts and continues to support the Puget Sound Regional Council (PSRC) Vision 2050 process. Bothell appreciates the analysis of racial and social equity in the DSEIS and supports the inclusion of policies to advance racial and social equity in Vision 2050.  Preferred alternative -Transit Focused Growth  The City of Bothell supports the Transit Focused Growth alternative as the preferred alternative to be evaluated in the Final EIS for the Vision 2050 Plan. The City believes this should be the preferred alternative because it is most consistent with the Growth Management Act goals and principles and is supported by the Imagine Bothe//...Comprehensive Plan. As the preferred alternative it leverages investments in urban infrastructure (especially high capacity transit - HCT) in support of higher	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for the Transit Focused Growth alternative has been acknowledged.

Commenter	Comment Number	Comment Text	Response
		residential and employment densities. It would also do more to concentrate growth in core areas for more walkable, livable communities and create more opportunities for affordable housing. In contrast with the 'Reset Urban Growth' alternative, this preferred alternative also avoids growth close to rural and natural resource lands.	
City of Bothell	2	<p>Allow multi-county cities to manage growth allocations</p> <p>Like the cities of Auburn, Milton and Pacific, Bothell is in two counties and receives separate growth targets from each county. However, Bothell is unique in that its geographic split between King and Snohomish counties is roughly 50:50. Under past practices, the City was directed to assign population and employment growth within the county providing the target. However, as the local government responsible for future land use and infrastructure decisions, the city is in the best position to determine how allocation of growth should occur within its borders, regardless of county boundaries. Under these past practices, instead of planning growth based upon the capability of transportation infrastructure, urban services, parks, utilities and other amenities, the City must assign growth based on County boundaries. The City requests the Final SEIS evaluate the impacts of allowing the City of Bothell and other multi-county communities, to allocate their entire growth targets as deemed to be locally appropriate.</p>	The Growth Management Act requires growth allocations to be set by counties with their cities. Meeting that state requirement may limit multicounty cities from shifting allocations from one county to another. This would be appropriate to discuss during the countywide target setting process.
City of Bothell	3	<p>Improve jobs/housing balance</p> <p>The City of Bothell supports the employment re-allocation of 5% of King County's employment growth to outlying counties, including 2% to Snohomish County. This action benefits Bothell's Canyon Park Regional Growth Center as well as encourages employment to be dispersed closer to population areas. Additionally, this re-allocation is supported by Community Transit's expanding bus rapid transit system, including the Green Line that serves the employment centers within Bothell, Everett and Lynnwood with future connections to light rail.</p>	Support for reallocation noted.
City of Bothell	4	<p>Maintain Urban Growth Areas (UGAs)</p> <p>The City has observed the benefits of the established UGA in preserving rural and resource lands by focusing growth in areas with existing infrastructure and fewer environmental constraints and supports maintaining the current UGA. Regional and local policies should continue to allocate growth within the current UGA and especially in cities that, under GMA, are the appropriate providers of urban services. Bothell requests that the Final SEIS include a brief discussion regarding the impacts associated with expansion of the UGA, particularly as it relates to the Transit Focused Growth alternative.</p>	The board discussed the importance of maintaining a stable UGA. Policy RGS-5 (previously DP-1) was revised to state, "Ensure long-term stability and sustainability of the urban growth area consistent with the regional vision." Given that direction, the SEIS and all of the alternatives assume that forecasted growth will be predominantly accommodated in the existing UGA and that the UGA boundary will not significantly change during the planning period. Impacts associated with UGA expansion would typically be greater than impacts associated with rural growth including increased land conversion, increased impervious surfaces, higher levels of vehicle miles travels, longer travel times, increased greenhouse gas emissions, habitat and water quality impacts, including fragmentation, and increased need for public service and utility expansion. The nature of such an expansion is hypothetical and would depend on those lands converted to urban, their relationship to other urban areas, and the intended development pattern. If such expansion were entirely or largely residential at urban densities, it would likely increase the imbalance between residential and jobs locations, further exacerbating impacts such as travel times and greenhouse gas emissions. Expansion could result in the loss of farm land, forest land or other resource lands currently outside of the UGA causing an impact to jobs and local economies. In limited instances, expansion could include areas already developed with urban densities and served by sewer and water utilities. In those cases, UGA expansion may result in less land use change and impact.
City of Bothell	5	<p>Analyze timing of growth relative to HCT service</p> <p>One issue raised by the Transit Focused Growth alternative is the amount of delay between growth allocations and plan updates relative to completion of the transit investments this alternative relies upon. In Bothell's case, high capacity transit in the form of bus rapid transit (BRT) just recently began serving Canyon Park. Future service is planned for the SR-522 and I-405 corridors, including service to downtown Bothell and the UW/Cascadia College campus beginning in 2024. Other parts of the regional high capacity network serving Snohomish County and other parts of East King County will not come on line for another 15 to 20 years or more. Bothell supports a Final SEIS analysis that establishes a range of intermediate growth allocations that would allow jurisdictions to monitor progress relative to operation of future high capacity transit service.</p>	Guidance in VISION 2050's Regional Collaboration chapter acknowledges that growth may be phased over the entire 30 year planning period based upon the availability of high capacity transit or other infrastructure. The targets established by countywide groups can function as more intermediate allocations that take into account the timing of transit investments.
City of Bothell	6	<p>Increase allocation of moderate density housing</p> <p>All three alternatives result in a low percentage of moderate density housing. The Transit Focused Growth Alternative provides the highest percentage of moderate density by allocating 19 percent toward this housing type. Moderate density housing at 12 to 49 units per acre is an important source of affordable, market-rate housing. Further, moderate density housing is intended to be close but not immediately adjacent to transit facilities which are more appropriate for transit-oriented development. Moderate density housing also helps with the 'missing middle' housing types such as duplexes, triplexes, fourplexes, townhomes, and low-rise apartments and condominiums. The city has observed that townhomes are becoming a popular form of housing and recent projects are achieving the moderate density level.</p> <p>Bothell suggests that the Final SEIS analyze a greater percentage level of moderate density housing within the Transit Focused Growth alternative by decreasing the percentage of low-density development. Another option would be to allow individual jurisdictions the flexibility to set their own percentages, provided the jurisdiction meets its assigned growth targets.</p>	Increasing the proportion of moderate-density housing is an important strategy called for in VISION 2050. PSRC's model for developing allocations by alternative uses the zoning currently in place. Modelling results show that the Transit Focused Growth alternative resulted in the greatest amount of moderate density housing. However, jurisdictions can increase middle density housing by allowing more of it in their zoning codes.

Commenter	Comment Number	Comment Text	Response
City of Bothell	7	Analyze shift of growth between unincorporated urban lands and HCT communities Bothell is aware that Snohomish County is considering a shift of population from HCT communities to the urban unincorporated and rural areas under the Transit Focused Growth alternative. This could affect lands within Bothell's assigned Municipal Urban Growth Area. The City is requesting the Final SEIS analyze the impacts of this additional growth in the urban incorporated and rural areas on adjacent cities as well as implications for future growth capacity when these areas are eventually annexed. Thank you, again, for the opportunity to comment on a preferred alternative for VISION 2050. If you have any questions about these comments, please contact Michael Kattermann, Community Development Director (michael.kattermann@bothellwa.gov, 425-806-6401).	The Final SEIS incorporates changes made to the Preferred Growth Alternative and analyzes the impacts. Impacts are generally reported on the regional and county scale and may not be discernable at the small subarea scale, however.
City of Bremerton	1	Puget Sound Regional Council Staff, On behalf of the City of Bremerton, the City would like to provide the following comments regarding the Vision 2050 Update. We appreciate the extended comment period and time to review the prepared alternatives and provide comments to ensure the plan helps positively shape the future of Puget Sound communities. The City appreciates that all three proposals within the Draft Supplemental Environmental Impact Statement have not changed the primary growth strategy that intends to help preserve resource lands, protect rural lands from urban-type development, and promote infill and redevelopment within urban areas to create more compact, walkable, and transit-friendly communities. The City is supportive of Stay the Course and Transit Focused Growth for the future growth strategy for Vision 2050, or a hybrid of these two alternatives. It is important that the preferred alternative be the one that utilizes less land for growth, therefore resulting in a more compact development footprint that protects our environment. Compact development will also ensure that costs for local jurisdictions and our taxpayers will be reduced because infrastructure and urban services will not have to be extended out to rural areas. We support the alternative that encourages less sprawl and keeps our rural lands rural.	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for the Transit Focused Growth and Stay the Course alternatives has been acknowledged.
City of Bremerton	2	Bremerton believes the growth strategy should focus growth around major transportation infrastructure. With that being said, please continue to work with the City of Bremerton and Kitsap County's jurisdictions to adopt policies and transportation funding strategies that reflect Kitsap County's current and future status with public transportation. As the light-rail has plans to expand throughout the Snohomish, King and Pierce Counties, we understand the need to have smart planning strategies, and funding, around light-rail/mass transit. However, please recognize that Kitsap County's jurisdictions do not have light-rail planned. We are concerned that there may be unintended impacts if we proceed with the "Transit Focused Growth" and that Bremerton, Bainbridge Island, and Kitsap County who utilize ferry transportation, a mass transit option, are not as fully recognized by the policies that are light-rail oriented. Please consider the impacts region-wide of the very specific light-rail policies. The City looks forward to the progression and implementation of this guiding document. Sincerely, Greg Wheeler, City of Bremerton, Mayor	Concerns about transit modes are acknowledged. High-capacity transit throughout the region is important and includes ferries and bus rapid transit.
City of Covington	1	The City of Covington appreciates the opportunity to comment on the draft VISION 2050 growth options to date and commends the consideration applied to the draft VISION 2050. The City generally supports the opportunities and measures in the Transit Focused Growth scenario. The DEIS demonstrates that Transit Focused Growth scenario will yield many positive outcomes; such as an 85% increase in transit trips, an 83% share of high-density King County growth, and a 16% reduction in Greenhouse Gas Emissions. However, the Transit Focused Growth scenario assumes 75% of the region's growth within a quarter to half mile from current and high capacity transit stations, which we believe seems high. In addition, the average drive time per day with Transit Focused Growth is only 2 minutes less than the other alternatives.	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for the Transit Focused Growth alternative has been acknowledged. Based on feedback on the Draft SEIS alternatives, for the Preferred Growth Alternative, the regionwide goal for population growth in regional growth centers and areas within walking distance of high-capacity transit was set at 65%.
City of Covington	2	The City of Covington maintains concerns that selection of the VISION 2050 Transit Focus Growth option will encourage PSRC to use growth targets as a powerful tool to dictate local land use policy. To date, growth targets provided to many of the Cities and Towns have not adequately incorporated signed development agreements and local growth trends for Cities and Towns strategically located along I90 and SR18. In fact, the last PSRC certification of Covington's Comprehensive Plan was particularly troublesome. The application of the growth targets, since their inception, appeared to have changed from a "floor" to a "ceiling" to a "guide post," without regional coordination or partner city input. Were PSRC to proceed with selection of the Transit Focused Growth scenario, the City would strongly recommend the following three items to ensure regional coordination: 1. Involve city staff in transparent and coordinated target-setting for each city. This way, city staff can ensure PSRC targets accurately reflect signed development agreements and local policy. 2. Ensure a continued definition of growth targets as a "floor" or "minimum" populations target to be met for all urban growth area, the foundational GMA requirement that applies uniformly to all the UGA regardless of size or geographic location. 3. Base consistency determinations on polices, such as Transit Oriented Development incentives in large cities targeted for higher levels of growth, rather than one set of numeric criteria. 4. Ensure that cities who comply with Vision 2050, yet due to market demand exceed their projected growth targets, are not penalized for growth out of their control. We appreciate the opportunity to comment and we look forward to working with you to ensure the targets for the City are set as a minimum, recognize signed development agreements, and allow for local strategic planning necessary to enable redevelopment and continued economic vitality for the City of Covington. Sincerely, Mayor Jeff Wagner	Target setting at the countywide level will provide the opportunity to consider the unique circumstances of each jurisdiction, including development agreements. Jurisdiction staff working with elected officials to help inform the target setting process, as suggested, is a good idea. Plan certification is based on planning consistent with allocated growth targets rather than actual growth.

Commenter	Comment Number	Comment Text	Response
City of Des Moines	1	<p>Dear Ms. Harris,</p> <p>The City of Des Moines appreciates the opportunity to review and comment on the Vision 2050 Supplemental Environmental Impact Statement (SEIS).</p> <p>The City appreciates the important work of the Puget Sound Regional Council (PSRC) and the consideration of alternatives and associated impacts related to housing affordability; economic inequality; social equity and access to opportunity; healthy communities; climate change adaptation and mitigation; demographic shifts or changing needs; and funding for infrastructure and other improvements.</p> <p>In considering the three alternatives (Stay the Course, Transit Focused Growth and Reset Urban Growth) in the context of Des Moines' growth as a city, several dynamics are crucial to consider. Urban growth patterns in the region reflect economic demand essential to development, and south King County enjoys competitive advantage in cost of land which is less than in other urbanized areas in our region. This creates job growth and subsequent demand for residential housing, transit oriented areas, and the ongoing dynamic of our city moving toward more urbanization and changing from a single family suburban residential city.</p> <p>In many ways, these changes are positive. Higher transit mobility relieves demand for vehicular traffic on the grid. Local job growth, concurrent with housing development increases quality of life and provides for a more integrated community (living where one works, where families recreate together and children attend local schools). Reducing commute times and offering transit-oriented options (for example, the Metro Community Connections Shuttle program) reduces carbon emissions and assists in mitigating climate change impacts.</p> <p>Transit oriented development around existing Bus Rapid Transit (BRT) and future Sound Transit stations will increase urbanization in a manner that takes advantage of transit options. This provides for the integration of transit with development patterns and reduces reliance on single occupant vehicles, reducing congestion regionally. However, it is important to note that the City of Des Moines has several challenges in accessing transit, including light rail and BRT. There is no light rail station planned within the City of Des Moines, and limited east-west options for accessing either light rail or BRT.</p> <p>We would like to emphasize several critical factors that must be addressed as mitigation in the increased urbanization of Des Moines as a newly designated High-Capacity Transit (HCT) Community.</p> <p>First, transportation infrastructure will include expanded light rail and current BRT. This provides for North-South transportation access. However, critical consideration must be given to "the last mile," dynamic.</p> <p>The Last Mile Problem refers to the provision of travel service from the nearest public transportation node to a home or office. 1</p> <p>In the case of Des Moines (and other communities), the value of access to the transit systems will dictate their value in our community:</p> <ul style="list-style-type: none"> <li>-Though Des Moines will accommodate light rail infrastructure, it will not host a station and the half-mile radius for walkability will be interrupted by two major highways; Pacific Highway and the 509 integration with I-5.</li> <li>-Des Moines has a multi-layered demographic character with many senior citizens and special needs populations needing access to transit.</li> <li>-The light rail station at Angle Lake is usually filled to capacity by 8 am, constraining day time use of the light rail for motorists planning on parking at the light rail station.</li> <li>-The same is true for BRT related to capacity and access constraints.</li> <li>-East-west access to both light rail stations and BRT is limited and presents a barrier to using transit. Connections to the Sounder station in Kent must be developed which would provide multi-modal options for those utilizing the east-west grid.</li> </ul> <p>Emphasis must be placed on Last Mile transportation systems, allocating appropriate resources through regional transportation planning and funding.</p> <p>Des Moines is also uniquely situated to accommodate water taxi service to Seattle and Tacoma. Mitigation measures should include development and funding support for water taxi services in addition to other multi-modal options, including access and parking improvements to access BRT and light rail services.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The information on local transportation challenges has been noted. The upcoming comprehensive plan and Regional Transportation Plan updates provide opportunities to improve access to regional high-capacity transit. Policies and actions in the Transportation section of VISION 2050 support this work to improve access.</p>
City of Des Moines	2	<p>Second, mitigation measures for impacts related to displacement, social equity, and transportation should include preserving local flexibility in accommodating additional housing and employment growth.</p> <p>Des Moines' ability to increase densities adjacent to light rail/BRT station areas may be limited based on vacant/redevelopable land supply. Additionally, Des Moines has planned for growth with a focus on nodes versus a dispersed pattern. BRT is located linearly along Pacific Highway, the location of our greatest low income population. Medium density housing likewise is located along this corridor.</p> <p>1 Wang, H. and Odoni, A., (2014) Approximating the Performance of a "Last Mile" Transportation System, Transportation Science, Vol. 50 #2</p> <p>The SEIS acknowledges that all alternatives have the potential to displace low income households unless affordable housing opportunities or other supports are provided. It notes that medium density housing currently provides a source of affordable housing so displacing this housing stock could impact affordability in our community. Additionally, local conditions must be recognized, such as directing a significant additional population growth to areas in close proximity of flight paths and associated noise, traffic and air quality challenges. Preserving local flexibility allows communities to plan appropriately for growth in a way that addresses these local conditions and challenges.</p>	<p>Strategies to avoid displacement and increase housing affordability are appreciated, and mitigation strategies are provided in the SEIS. Jurisdictions can incorporate similar strategies into their local housing strategies and comprehensive plans. The Housing section of VISION 2050 contains an action to develop a regional housing strategy, which will identify additional housing strategies. Countywide growth targets provide an opportunity to plan for growth based on more local circumstances.</p>
City of Des Moines	3	<p>Third, it is also critical that Vision 2050 accountability not only focus on numeric growth expectations, but take into account factors related to existing growth dynamics. In the situation of Des Moines (and other proximate cities), we face undue and disproportionate negative impacts from the ever increasing operations of Sea-Tac International Airport. This has both social equity and public health implications.</p>	<p>VISION 2050 addresses the impacts of airports on adjacent communities.</p>
City of Des Moines	4	<p>As Vision 2050 seeks a fair distribution of anticipated future growth, a comprehensive assessment of growth on multiple levels of regional activity must be included. The City of Des Moines is supportive of a "hybrid" alternative as the preferred alternative, with aspects of both Stay the Course and Transit Focused Growth. As noted above, maintaining local flexibility is essential in planning for growth in proximity to transit in meeting the needs of the region as well as accounting for local conditions. The</p>	<p>The city's preference for a hybrid of the Transit Focused Growth and Stay the Course alternatives has been acknowledged.</p>

Commenter	Comment Number	Comment Text	Response
		percentage of growth to be directed to areas proximate to transit in Transit Focused Growth, may be unrealistic for Des Moines, a community without light rail stations, few east-west commuter options and challenged with proximity to Sea-Tac Airport.	
City of Des Moines	5	<p>The City of Des Moines commented on the Vision 2050 Scoping (March 19, 2018). Here are our previous scoping comments regarding airport impact on our city:</p> <ul style="list-style-type: none"> <li>o Alternatives should include a significant discussion of aviation planning, utilizing the information developed through the PSRC regional baseline aviation study which is expected to be complete in 2019. This study is an opportunity to understand the dynamics of the region's growing aviation activity and is intended to include an evaluation of the impact of airport activities on surrounding communities.</li> <li>o It is state policy to work with appropriate local and regional authorities to begin the process of siting a second large commercial airport in western Washington, and Vision 2050 should provide policy guidance toward this end. The City requests that alternatives evaluated in the Environmental Impact Statement include the siting of a new international airport within the region. Environmental considerations must be critical in the decision to site new airports and this thorough evaluation of impacts to all elements of the environment due to aviation system growth must be included in the environmental analysis for this regional planning document.</li> <li>o Specifically, the disproportionate impacts experienced by Des Moines residents and surrounding communities due to regional population growth fueling demand for additional capacity at Sea-Tac Airport should be thoroughly analyzed for all alternatives, including impacts on human health and to air and water quality.</li> <li>o Sea-Tac is growing rapidly and Vision 2050 should also provide policy guidance to assure that multi-modal options are the standard for addressing Sea-Tac Airport growth. Constraints on the capacity of the regional transportation grid to absorb millions of more passengers and tons of cargo must be seen as signaling consideration of new airport facilities that will relieve congestion, not simply add to it. The integration of the state aviation system into regional transportation planning is essential to the accommodation of future demand at Sea-Tac and elsewhere.</li> <li>o The ability to implement sustainable measures to protect the natural environment, human health, mitigate noise and understand any adverse health impacts of jet fuel emissions is an essential component of the regional transportation system, and is a constraint on future airport capacity, expansion and growth.</li> </ul> <p>Since these scoping comments were made, State legislation is under consideration with wide support directing study of the siting of a second regional airport. This consideration and support should be incorporated as appropriate mitigation and associated policies in the SEIS and Vision 2050. PSRC's own regional air transport study, as discussed above, should also assess impacts from regional distribution of aircraft operations on adjacent, impacted communities. As Sea-Tac Airport moves forward with their Sustainable Airport Master Plan (SAMP) we encourage Vision 2050 to incorporate that growth plan into regional planning regarding Vision 2050. (We also would hope that PSRC will offer comments on the environmental assessment of the SAMP relative to Sea-Tac impacts on regional growth.)</p> <p>Thank you for the opportunity to comment, and for serious consideration of the City's comments and concerns. We look forward to the opportunity to continue this discussion on behalf of all of our residents.</p>	Scoping comments were reviewed previously and are again acknowledged.
City of Edmonds	1	<p>Erika Harris, AICP Senior Planners, SEPA Responsible Official, SEIS Project Manager Puget Sound Regional Council 1011 Western Avenue, Suite 500 Seattle, WA 98104-1035 SUBJECT: City of Edmonds' Comments on VISION 2050 DSEIS</p> <p>Dear Ms. Harris,</p> <p>The City of Edmonds appreciates the VISION 2050 process that brings our region together to plan for the future. Comments here are in response to the Draft Supplemental Environmental Impact Statement ("Draft SEIS") for VISION 2050.</p> <p>Preferred alternative-Transit Focused Growth</p> <p>Of the three alternatives, Transit Focused Growth is preferred. This alternative recognizes the value of transit and that growth needs to be concentrated most near suitable transit stations, especially where light rail will be located. It also recognizes the importance of planning for designated centers within incorporated urban growth areas, a notable feature of VISION 2040 that carries forward.</p> <p>Some flexibility at local level</p> <p>In selecting an alternative and finalizing the SEIS, attention needs to be paid to maintaining some level of flexibility at the countywide level, where cities and the county can work together on certain details, yet be consistent with regional objectives and outcomes.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for the Transit Focused Growth alternative has been acknowledged. As suggested, target setting at the countywide level will provide flexibility and the opportunity to consider the unique circumstances of each jurisdiction, including development capacity.
City of Edmonds	2	<p>Maintaining urban growth areas</p> <p>The final SEIS should include discussion of the impacts of maintaining vs. expanding urban growth areas. Expanding urban growth areas into rural areas can negatively affect opportunities for moderate density growth in cities and their future annexation areas, as well as exacerbating traffic problems and causing the loss of rural and resource lands.</p>	The board discussed the importance of maintaining a stable UGA, and the alternatives all assume that forecasted growth can be accommodated in the existing UGA. Given that, the SEIS does not study UGA expansion explicitly. Impacts associated with UGA expansion may be similar to impacts associated with rural growth including higher levels of vehicle miles travels, longer travel times, increased greenhouse gas emissions, habitat and water quality impacts, and increased need for public service and utility expansion.

Commenter	Comment Number	Comment Text	Response
City of Edmonds	3	<p>Climate change</p> <p>The SEIS should discuss climate change and the importance of significantly reducing carbon emissions. Selecting Transit Focused Growth as the preferred alternative is most compatible with reducing greenhouse gas emissions. The range of climate impacts needs to be considered for each alternative.</p> <p>Finally...</p> <p>Thank you for considering our input. The City of Edmonds looks forward to participating in VISION 2050 planning, knowing that each city and county in the central Puget Sound region has a shared future that will be served best by adhering to regional goals, while maintaining local character.</p> <p>Sincerely, David O. Earling Mayor, City of Edmonds</p>	<p>Both the SEIS (Air Quality and Climate Change) and VISION 2050 (Climate Change section) discuss climate change and reducing greenhouse gas emissions. However, more emphasis on the importance of reducing greenhouse gas emissions has been added to the Final SEIS.</p>
City of Everett	1	<p>Dear Ms. Harris:</p> <p>The City of Everett appreciates the PRSC's outreach efforts and the opportunity to provide comments on the Vision 2050 Draft SEIS. The City has reviewed the draft SEIS and appendices and offers comments for consideration as the PSRC crafts a Preferred Alternative and the Final SEIS for Vision 2050.</p> <p>As the only Metropolitan City within Snohomish County, Everett will see significant population and job growth between now and 2050. Everett accepts this important role and regional expectations. Everett has been actively developing plans to implement the Regional Growth Strategy since Vision 2040 was adopted in 2008. Despite these efforts, the growth in Everett, the region, and within Snohomish County has not aligned with the regional vision.</p> <p>Many of the expectations of Vision 2040, and the growth targets that have been adopted into local comprehensive plans, are based on assumptions that may no longer be valid in our evolving national and regional economy. As we consider extending our growth strategy, it is critical that the PSRC examine; what has worked well with Vision 2040, what assumptions have not been successful and why.</p> <p>Previous Communications</p> <ol style="list-style-type: none"> <li>1. Everett has participated with other local governments through Snohomish County Tomorrow (SCT) to reach out early to the PSRC and establish a clear understanding of the process, and issues to be addressed in the Vision 2050 update to the adopted Vision 2040 Regional Growth Strategy (RGS). We appreciate PSRC considering the input and feedback provided through SCT.</li> <li>2. The Vision 2040 RGS, adopted in 2008, established "regional geographies" that created a hierarchical priority for assigning where future population and job growth should occur. This approach established that Metropolitan cities should be the top priority for accommodating significant shares of growth, with lower percentages allocated to Core cities, large cities, small cities, and unincorporated urban areas. Everett advocated against allocating growth according to the Vision 2040 regional geographies. Instead, we recommended a more direct approach to allocating to locations where planned high capacity transportation investment could efficiently serve centers for growth.</li> <li>3. In the December 7, 2017 letter to the PSRC, SCT also endorsed a revised strategy for distributing future growth with Vision 2050. Everett appreciates the proposed revision to "regional geographies" that more closely aligns with this approach, particularly with the Transit Focused Growth alternative, which allocates growth near high capacity transit stations, whether in cities or unincorporated urban growth areas. This is especially important within Snohomish County, where two of the ST3-funded light rail stations will be located in what are currently unincorporated urban areas.</li> </ol>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. PSRC appreciates the city of Everett's efforts to implement the Regional Growth Strategy. The Preferred Growth Alternative, based on the Transit Focused Growth alternative, helps to address concerns by allocating a large proportion of growth in high-capacity transit station areas.</p>
City of Everett	2	<p>Draft Alternatives and Growth Since 2008 Adoption of Vision 2040.</p> <ol style="list-style-type: none"> <li>4. The population and job growth targets for the three alternatives identified in the Draft SEIS reflect the revised approach to regional geographies, particularly for Everett and Snohomish County. The Stay the Course alternative would result in a greater amount of population and job growth in Everett than the Transit Focused Growth alternative, which in turn would place more growth in Everett than the Reset Urban Growth alternative. The significant transit investments being made in light rail service under ST2, will bring light rail to Lynnwood by 2024. ST3 will build additional light rail stations south of, and within Everett by 2036. Based on these funded investments, the growth numbers in the Transit Focused Growth alternative have a more realistic chance of being realized than those associated with the Stay the Course alternative.</li> <li>5. Since Vision 2040 was adopted in 2008, development activity in Snohomish County has followed a pattern closer to the Reset Urban Growth alternative than the growth called for by the current RGS. Growth rates in the unincorporated UGA have greatly exceeded those of the Metropolitan city (Everett) and the Core cities (Lynnwood and Bothell). This pattern is inconsistent with the Vision 2040 RGS growth numbers, and makes the Stay the Course alternative much less likely to be successful in the Vision 2050 update.</li> <li>6. One lesson from our experience with Vision 2040 has been that the realities of the regional real estate market have far more influence on where growth occurs than aspirational goals stated in regional or local plans. Without substantial investments in economic development and transportation infrastructure improvements, it is difficult to see how these trends will change.</li> </ol>	<p>Comments on growth rates and the need for investment acknowledged.</p>

Committer	Comment Number	Comment Text	Response
City of Everett	3	<p>Growth Targets</p> <p>7. Vision 2050 should take a pragmatic look at how population and job growth figures associated with the preferred alternative will be used in setting growth targets in local plans. The region needs to be able to adjust when unforeseen shifts in the regional economy change the fundamental assumptions used to establish growth numbers. Vision 2050 and implementing County-wide Planning Policies (CPP's) should provide flexibility and allow modification of local targets when it becomes clear that growth assumptions are not in line with the realities of market forces. Vision 2050 should state that the purpose of its growth guidance is to help local jurisdictions set growth targets, and acknowledge that growth figures are based upon regional aspirations and other assumptions that local jurisdictions have little ability to control on their own. It would also be helpful to state that local jurisdictions are not required by law to realize the aspirational targets, just to provide sufficient land capacity, zoning, and investment strategies to accommodate adopted growth targets. If local jurisdictions are going to achieve the growth targets as assigned, PSRC needs to do more to support incentives and innovative land use tools to that end.</p> <p>8. Each of the three Vision 2050 alternatives would have much more growth in Everett than provided for under our 2035 comprehensive plan growth targets, as indicated below:</p> <p>2035 Everett Growth Targets: Population 165,000, Employment 140,000  2050 Stay the Course: Population 230,000 (+65,000) Employment 201,000 (+61,000)  2050 Transit Focused Growth: Population 197,000 (+32,000) Employment 194,000 (+54,000)  2050 Reset Urban Growth: Population 192,000 (+27,000) Employment 187,000 (+47,000)</p> <p>9. To illustrate the challenge with the growth figures under the three Vision 2050 alternatives, Everett's population would have to grow at an annual average rate between 2017 and 2050, ranging from 2,485 for the lowest alternative (Reset Urban Growth) to 3,636 for the highest (Stay the Course). Since 2000, Everett's population has grown at an average annual rate of only 1,095. We would have to more than double our growth rate for the lowest growth alternative, and more than triple it for the highest growth alternative. Such a turnaround is not easily accomplished. To realize such a dramatic increase in our rate of growth will require more than just "bending the trend." It will require commitments throughout the region that to date have not existed.</p> <p>10. Everett has taken a number of steps since the 2008 Vision 2040 RGS was adopted to increase the City's population and job growth capacity and incentivize the development process for higher density mixed use development in the City's transit corridors. These include new zoning in the north Broadway corridor, new zoning and other incentives in the Evergreen Way corridor, a new plan in the Everett Station area, which has recently been replaced by the Metro Everett Subarea Plan (with new zoning and other development incentives) that also includes downtown Everett. Despite these plans, zoning, and other incentives, few developers have taken advantage of these opportunities. Since the initiation of Swift BRT service in the Evergreen Way corridor in 2009 and the Evergreen Way rezoning in 2012, only one new multi-family development has been built in this 6.5 mile long corridor.</p> <p>11. We believe the lack of development in our priority growth and transit areas is due to many factors, most of which the City has little influence to change in a way that would create more demand for development in Everett. The growth patterns in Snohomish County for the past decade indicate a preference for developing raw land in other communities, rather than the more challenging task of redevelopment in Everett. Consumer preference for single-family detached housing has favored development outside Everett, which has little land available for building more of this housing type. The strong job growth and demand for rental housing in Seattle and King County favors multi-family development there over the lower rent levels a developer can achieve for rental housing in Everett. While this recent trend may change in the future, it is highly unlikely we will be able to add population at two to three times the pace of the past two decades if the status quo persists.</p> <p>12. The emphasis of the statements in paragraphs 6 - 11 is that Everett, independently, cannot commit to any specific target at this time. We can evaluate how to create additional capacity for growth in subsequent planning efforts to take place after the adoption of Vision 2050, but without the PSRC and our regional partners enacting new incentives for growth in communities like Everett, cannot presume that the growth numbers of any of the alternatives are accurate over the next 30 years.</p>	As suggested, target setting at the countywide level will provide the flexibility to consider circumstances such as the timing of light rail transit development and the economy. Everett's planning and investments are appreciated.
City of Everett	4	<p><b>** Impacts of Draft Alternatives **</b></p> <p>13. We note that from the perspective of environmental impacts, as described in the Draft SEIS and appendices, that the Transit Focused Growth alternative has the least overall impact to the environment across the region compared with the other alternatives. The many metrics used to compare overall impacts across all three alternatives show a consistently better environmental outcome from Transit Focused Growth.</p> <p>14. PSRC has provided a separate matrix identifying the overall impacts of the alternatives within Snohomish County, which differs from the overall impacts within the region. However, the matrix still shows Transit Focused Growth as having the least environmental impact within Snohomish County among the three alternatives.</p>	Comments noted.
City of Everett	5	<p>Updated Multi-county Planning Policies (MPPs)</p> <p>15. In reviewing the draft policy amendments in the Multi-county Planning Policies (MPPs), Everett agrees with most of the proposed policy amendments. The additional emphasis on maintaining stable urban growth area boundaries, addressing equity, climate, transit oriented development, affordable housing, access to opportunity, improved mobility options, air and water quality, and improved coordination among public service providers, are an improvement to the current MPPs. The revised policies will serve as a strong foundation for updates to the CPPs for each of the counties.</p> <p>16. Everett's elected officials previously sent a letter asking that Vision 2050 include a climate change element (see attached letter from Mayor Franklin and Everett City Council). It is critical that Vision 2050 provide strong policy guidance for a regional climate strategy among local governments and regional partners that addresses greenhouse gas reduction, and adaptation to the impacts of climate change.</p> <p>17. The draft Economy policies and actions do not mention the opportunities for economic growth in our region presented by the challenges of climate change and the emerging green economy. Growing the Green Economy in Washington State, recently published by the Association of Washington Cities Center for Quality Communities,</p>	A climate change chapter/section has been added to VISION 2050. It contains updated and new policies to address reducing greenhouse gas emissions and adapting to climate impacts. An Economy policy on environmental sustainability was updated to encourage economic development specific to addressing climate change and resilience.

Commenter	Comment Number	Comment Text	Response
		provides an excellent resource the PSRC can use to strengthen regional policies and promote sustainable growth through the economic development elements in local comprehensive plans.	
City of Everett	6	<p><b>**Selection of a Preferred Alternative **</b></p> <p>18. Everett favors the Transit Focused Growth alternative, as it emphasizes future growth in proximity to high capacity transit service and facilities, and has the least overall environmental impact among the three alternatives. In crafting a Preferred Alternative, PSRC should also consider beneficial aspects of the other two alternatives. For example, Stay the Course places a greater amount of employment growth in Kitsap, Pierce and Snohomish counties, and less in King County, which would improve the jobs-housing balance. Additional job growth in the other three counties could reduce the need for travel into King County and the transportation costs and environmental impacts associated with this commute pattern.</p> <p>19. Would it be possible to consider a preferred alternative that distributes even more job growth to the other three counties and less to King to promote a better jobs-housing balance?</p> <p>20. The population and employment growth figures for whatever hybrid may be selected as a preferred alternative, while illustrative of the order of magnitude of the growth the region must accommodate, cannot be viewed as hard targets at this stage of the planning process. Much more planning work at the countywide and local level, including CPPs, buildable land analyses, local visioning, and public input, must take place to establish realistic and supportable growth targets for individual jurisdictions. MPPs and CPPs must allow for flexibility in setting numerical targets for population, housing and employment growth.</p> <p>21. Vision 2050 should identify how the RGS will assist local jurisdictions to create a more favorable environment for the economic investment needed to become successful in attracting the desired shares of population, housing and job growth, especially for jurisdictions that have not experienced the levels of growth anticipated in Vision 2040.</p>	The city's preference for the Transit Focused Growth alternative and other suggestions have been acknowledged. The Transit Focused Growth and Preferred Alternative also shift employment growth from King to Snohomish, Pierce, and Kitsap counties. The Growth Management Policy Board chose to limit the shift to 5%. VISION 2050 contains new regional actions to provide economic development, housing, and other technical assistance.
City of Everett	7	<p>Other Comments / Considerations</p> <p>22. While Sound Transit may not be ready to talk about expansion of the RTA district boundaries at this time, the 2050 time frame of this update to the RGS should include consideration of how to serve urban growth areas located beyond the current RTA boundaries with the light rail line, at least in Snohomish County. Vision 2040 was predicated on the extension of light rail service, and was adopted before either ST2 or ST3 were approved by voters. Vision 2050 should include transportation policies or actions that address the need for continued regional investment in light rail and other high capacity transit modes beyond the current Sound Transit system plans. Vision 2050 should also incorporate, to the extent possible, how other advancements in transportation technology will impact regional growth trends.</p> <p>23. Following the adoption of Vision 2050, the subsequent update of the regional transportation plan must prioritize facilities and modes that implement the vision and support growth in regionally designated centers.</p>	VISION 2050 benefited by being able to incorporate information from adopted long range plans with each of the region's transit providers, including Sound Transit. The population and employment projections included in VISION 2050 will support the update of the Regional Transportation Plan and consideration of potential new transit corridors that will be needed to support future growth.
City of Everett	8	24. Annexation under current State statutes is difficult. Everett supports DP-Action-9, which calls for actions to address current barriers to annexation.	Comment acknowledged. A new Development Patterns action to communicate to the state legislature about barriers to annexation has also been added.
City of Everett	9	<p>25. DP-Action-10 should be amended as indicated below to remove the expectation that cleanup of local brownfield properties will necessarily involve countywide planning bodies.</p> <p>Identification and Clean-up of Underused Lands: [Strike: Countywide planning bodies, in cooperation with their cities,] [Insert: Local governments, in cooperation with State and/or federal regulatory agencies,] will develop strategies for cleaning up brownfield and contaminated sites. Local jurisdictions should identify underused lands (such as environmentally contaminated and surplus public lands) for future redevelopment or reuse.</p>	The Growth Management Policy Board acted on this amendment request during their review of the draft plan public comments and the revised language was recommended to the Executive Board.
City of Everett	10	26. The strengthened housing policies and actions call for a much-needed regional housing assessment. Local jurisdictions struggle to create capacity for the number of housing units needed to accommodate regional growth. The mismatch between the cost to produce housing and the affordability needs of households will require a concerted regional effort. In the Final SEIS for the preferred alternative, please estimate the number of housing units by type (single-family detached, multi-family, etc.), tenure (owner-occupied, rental), based on projected household income ranges (relative to Area Median Income for each county) needed for individual jurisdictions, if available. It is critical to better align future housing types with the anticipated income levels of future households within each jurisdiction. If not available for each jurisdiction, the PSRC should consider how to develop this type of information to assist local jurisdictions as they work on their 2023-24 comprehensive plan updates.	VISION 2050 contains a Housing action to develop a regional housing strategy. This will include a regional housing needs assessment, and PSRC will consider how to assist local jurisdictions in developing this type of information as they work on their 2023-24 comprehensive plan updates. The model used for the SEIS is limited in its ability to forecast housing type.
City of Everett	11	<p>27. Implementing regional goals and local planning priorities requires stable funding sources for local government services and capital facilities. Washington's local governments struggle with structural imbalances between the cost to provide services and capital facilities, and the lack of sustainable revenues. As a state and region, we inadequately fund transportation, utilities and other public infrastructure. Without fundamental reforms in how local governments in the state of Washington are funded, it is unlikely the regional vision can be fully realized.</p> <p>In closing, Everett enthusiastically supports developing Vision 2050 and will actively participate in the plan progresses toward final adoption. Please contact planning director Allan Giffen or, Deputy Mayor Nick Harper if you wish to clarify any of these comments.</p> <p>Sincerely, Cassie Franklin, Mayor</p>	A new Regional Collaboration action to investigate new and existing funding sources has been added, as well as one on communicating to the state legislature and agencies on changes to state law and funding needed to advance VISION 2050.

Commenter	Comment Number	Comment Text	Response
City of Everett (verbal comment)	1	<p>Thank you Chair Mello and members of the committee. I may be actually under your second group but none the less I am delighted to be here and good to see you all. I am wearing the hat of the City of Everett in addition to my colleague Scott Bader today, but I'm also I think informally wearing a hat of the Puget Sound Clean Air Agency and I'm here to urge as we go forward with 2050, the planning horizon of 2050, that we really take two or three things into account. First, is that we look at developing a single metric for the region in terms of monitoring greenhouse gas emissions and we already have much of that work done for us. The K4C group in King County, Snohomish County, the City of Everett, and I suspect other jurisdictions have been looking at the metric used by the Puget Sound Clean Air Agency as well as Climate Solutions. That metric has been adopted by those jurisdictions so I think we have a framework that we can use. Which as an old public works director, emphasis on old, you don't manage what you don't measure and we need to have a measurement structure that looks at the whole region. Secondly, I would encourage the elevation of climate change as an issue seems hard to imagine adopting a plan for 2050 and not having that as a significant component and lastly our Council last night adopted a climate action plan resolution which instructs our planning commission to develop that we will provide to you a letter and this information as part of our comment. I wanted to encourage the consideration that we elevate climate change, we develop a metric structure, and I look forward to working with you in my other hat on the Transportation Policy Board as your colleague, so thank you for the time.</p>	<p>VISION 2050 contains a new stand-alone Climate Change section that addresses climate mitigation, adaptation, and resiliency. PSRC coordinates with the Puget Sound Clean Air Agency and VISION 2050 references the regional inventory of greenhouse gas emissions. A new Regional Collaboration action has been added to VISION 2050 to track the implementation of VISION 2050 through a regional monitoring program. In addition, further work and monitoring has been called for specific to climate change, and PSRC will continue to work with partners on those efforts.</p>
City of Everett (climate-specific comment)	1	<p>RE: Request to include a climate change element in the Vision 2050 plan Dear Executive Board members and Executive Director Brown:</p> <p>Thank you for the opportunity to comment regarding the Vision 2050 Regional Growth Strategy Draft Supplemental Impact Statement. This communication represents the City of Everett's (City Council and Mayor) comments regarding the overarching issues associated with climate change and the structure of the Vision 2050 plan. More detailed comments regarding Vision 2050 will be provided under separate communication from Everett Planning Director Allan Giffen.</p> <p>We appreciate PSRC 's recognition that "Climate change is of growing urgency..." in the Regional Growth Strategy. Moreover, we appreciate and generally support and encourage policies supporting cleaner transportation, electric vehicle technology, transit oriented development, growing transit communities, and improving green infrastructure.</p>	<p>Thank you for providing comments specific to climate change.</p>
City of Everett (climate-specific comment)	2	<p>The elected leaders of the City of Everett recommend PSRC consider climate change as a stand-alone element in the Regional Growth Strategy, Vision 2050. Given the seriousness and "growing urgency" of climate change and climate impacts, we believe a regional growth strategy looking to the year 2050 should include a climate change element that addresses mitigation (reducing greenhouse gas [GHG] emissions), adaptation (responding to the consequences of a changing climate, including in the area of emergency services) and green economic development (building the green economy). Such an action would underscore the seriousness of this issue, establish a framework for long range planning, and elevate the importance of responding to climate change issues as part of a regional strategy.</p> <p>To that end, we recommend PSRC adopt a standard metric for measuring GHG, develop a region-wide strategy for electric vehicle infrastructure, and a blueprint for developing the green economy. There is a well-recognized standard metric for measuring GHG emissions that is used by the Puget Sound Clean Air Agency, King County and its cities (K4C Group), the City of Everett, Snohomish County and others, known as the carbon wedge analysis. This structure should be adopted for the region to measure and monitor GHG emissions over time.</p>	<p>VISION 2050 contains a new stand-alone Climate Change section that addresses climate mitigation, adaptation, and resiliency. PSRC coordinates with the Puget Sound Clean Air Agency and references the regional inventory of greenhouse gas emissions. Future PSRC climate work will include a carbon wedge analysis, and regional efforts to advance electric vehicles have already begun.</p>
City of Everett (climate-specific comment)	3	<p>Also, the "Economy Chapter" does not appear to recognize the green economy or green economic development as an economic development opportunity. This should be added to the Economy Chapter.</p>	<p>A VISION 2050 Economy policy was updated to address the Green Economy.</p>
City of Everett (climate-specific comment)	4	<p>The Everett City Council recently adopted a resolution calling for the development of a Climate Action Plan (copy attached). Other cities have taken similar actions, and the City of Seattle has had a climate action plan in place for many years. Our resolution calls for addressing mitigation, adaptation and green economic development. We hope it will inform your efforts.</p> <p>Based on science, experience and history, climate change issues will continue to grow in importance and should be part of any regional growth management strategy looking to 2050. We urge PSRC to directly address climate issues by adopting a stand-alone element in the Vision 2050 Regional Growth Strategy.</p> <p>Sincerely, Cassie Franklin, Mayor Scott Bader, Council President Judy Tuohy, Council Vice President Paul Roberts, Council Member Jeff Moore, Council Member Brenda Stonecipher, Council Member Scott Murphy, Council Member Elizabeth Vogel, Council Member</p> <p>Resolution No. 7359. A Resolution requesting the Everett Planning Commission Prepare a Climate Action Plan for the City of Everett</p> <p>WHEREAS, climate change presents an existential threat to human existence on the planet, and impacts associated with climate change are being realized at global, national, regional and local levels; and</p> <p>WHEREAS, appropriate responses to climate change include rapidly reducing greenhouse gas emissions (GHG) (aka mitigation), preparing for circumstances such as storm events increasing in frequency and intensity, rising temperatures, flooding, fires and sea level rise (aka adaptation), and preparing for economic impacts; and</p> <p>WHEREAS, the City of Everett has taken steps to better understand and respond to climate change, reducing GHG emissions and preparing for climate change, including: adopting a "Climate Change And Sustainability Element" in the City's Comprehensive Plan in 2015, studying Everett's carbon footprint in 2016, updating the City's</p>	<p>The city is commended for its leadership on climate action. See above responses.</p>

Commenter	Comment Number	Comment Text	Response
		<p>Emergency Management Plans in 2017 &amp; 2018, updating elements of the City's Comprehensive Plan to improve transit oriented development and link housing and transportation in 2018, as well as ongoing monitoring of water supply and flooding along the Snohomish River; and</p> <p>WHEREAS, the City's Climate Change And Sustainability Element calls for development of a Climate Action Plan to be prepared in collaboration with the Puget Sound Regional Council, Puget Sound Clean Air Agency, Snohomish County PUD, Snohomish County, and the State Department of Ecology; and</p> <p>WHEREAS, the City's Climate Change And Sustainability Element calls for public participation, outreach and education to reduce GHG and adapt to climate change; and</p> <p>WHEREAS, the City's Climate Change And Sustainability Element recommends a number of steps to respond to climate change including but not limited to: reducing GHG generated by transportation, improving building energy use and efficiency, solid waste reduction, green economic development, and adapting to impacts of climate change; and</p> <p>WHEREAS, the Governor and Legislature are considering measures to reduce GHG, mitigate and adapt to climate change; and</p> <p>WHEREAS, the Everett City Council believes the policies set forth in the City's Climate Change And Sustainability Element should be implemented;</p> <p>NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF EVERETT</p> <p>Section 1. The Everett City Council directs the Everett Planning Commission to prepare a Climate Action Plan (CAP), consistent with the recommendations set forth in the City's Climate Change And Sustainability Element of the Comprehensive Plan, adopted in 2015 (Appendix A GOALS AND POLICIES OF THE CLIMATE CHANGE AND SUSTAINABILITY ELEMENT). The CAP should be prepared with input from appropriate agencies and organizations including but not limited to Puget Sound Clean Air Agency, Puget Sound Council of Governments, Snohomish County PUD, Department of Ecology and other organizations with technical expertise.</p> <p>Section 2. The CAP shall at a minimum: address mitigation (reduction of GHG) through efficient transportation, conservation and energy efficient buildings; address adaptation by preparing for higher temperatures, increasing storm events, floods, fires and sea-level rise; and seek green economic development opportunities.</p> <p>Section 3. The CAP shall set targets for reducing GHG, and adaptation; and recommend implementing measures to meet policy objectives including but not limited to:</p> <p>Establish a goal for 100% renewable energy by 2045,</p> <p>Support zero emission vehicles and electric vehicle-charging infrastructure,</p> <p>Support low carbon fuel standards,</p> <p>Improve building efficiencies, and</p> <p>Link emergency management plans with adaptation measures</p> <p>Section 4. In preparing the CAP, the Planning Commission will seek public input and seek opportunities to educate and inform Everett residents on the science of climate change and actions they can take to reduce GHG and adapt consistent with the recommendations in the Comprehensive Plan, Appendix A.</p> <p>Paul Roberts, COUNCIL MEMBER INTRODUCING RESOLUTION</p> <p>PASSED AND APPROVED THIS 3rd DAY OF APRIL, 2019</p> <p>SCOTT BADER, COUNCIL PRESIDENT</p>	
City of Issaquah	1	<p>RE: Vision 2050 draft Supplemental Environmental Impact Statement (SEIS)</p> <p>Dear Ms. Harris:</p> <p>Thank you for the opportunity to comment on PSRC's draft SEIS, and for your presentation to the City Council on April 1, 2019.</p> <p>Following that meeting, the City Council conducted a public hearing on April 8th, 2019. Additionally, the City Council had a discussion on April 15th, 2019 at their regular city council meeting and provided comments on the three alternatives.</p> <p>The Council recognized differences in impacts between the alternatives, and showed support for Alternative 1 and 2, although there were additional questions about the supporting information and analysis, which I have included in an attachment to this letter. I have summarized those Council considerations by alternative below; and, have attached a more detailed summary to this letter.</p> <p>Alternative 1 – Stay the Course</p> <p>High level feedback: Councilmembers felt that this alternative is aligned with our current city planning efforts and vision and, therefore, this alternative's potential future results may be better understood and familiar.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's support for the Stay the Course and Transit Focused Growth alternatives has been acknowledged.</p>
City of Issaquah	2	<p>Alternative 2 – High Capacity Transit (HCT) focus</p> <p>High level feedback: Councilmembers felt this alternative would provide the greatest positive environmental impact. Councilmembers voiced concern that this approach does not classify Issaquah's two transit centers as HCT and that may create increased competition for limited transportation funding. Councilmembers shared concerns about the likelihood of displacement of people and the affordable housing inventory</p>	<p>With the Transit Focused Growth alternative, regional growth centers continue to be prioritized for infrastructure and economic development funding (see VISION 2050 Regional Collaboration policies). Planned light rail stations, such as the one in the Issaquah Regional Growth Center, are considered high-capacity transit.</p>

Commenter	Comment Number	Comment Text	Response
City of Issaquah	3	<p>Alternative 3 – Dispersion</p> <p>High level feedback: Issaquah’s City Council does not support this alternative Councilmembers believe this alternative will result in a significant increase in congestion at the eastern edges of the Urban Growth Boundary. Please contact Development Services Director Keith Niven if you have any questions.</p> <p>Sincerely, Mary Lou Pauly, Mayor</p>	Comment acknowledged.
City of Kirkland	1	<p>RE: VISION 2050 SEIS Comment</p> <p>Dear Puget Sound Regional Council,</p> <p>This letter comprises the City of Kirkland’s formal comments on the Draft Supplemental Environmental Impact Statement (SEIS) for Vision 2050.</p> <p>We commend PSRC on identifying and evaluating three meaningful growth alternatives for the region, all of which would substantially increase transit ridership, reduce per capita vehicle miles traveled, and reduce greenhouse gas emissions. At this time of robust economic growth, and increased concern about regional traffic, housing affordability, and environmental protection, it is time to double-down on a growth strategy that focuses on infill development primarily within urban growth centers, and protection of resource lands. Therefore, we are pleased that all the evaluated alternatives conform to Vision 2040’s underlying principle: growth focused into metro and core cities. Adherence to this principle will ensure that the quality of life and environment in the region is protected, paving the way for continued economic success.</p> <p>While the City of Kirkland is pleased with the overall analysis in the SEIS, we offer the following big-picture comments:</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS.
City of Kirkland	2	<p>Equity/Displacement Analysis. The equity/displacement analysis seems to overlay job growth and demographic characteristics (e.g., communities of color, low-income communities) to yield equity/displacement impacts. In a dynamic economy, this may be an oversimplified approach to evaluating a complex and important issue, and could suggest that policymakers limit job growth in lower-income areas, when job growth might actually be beneficial to such populations. We agree with the focus on expanding housing affordability in these areas, but would also suggest that a more nuanced displacement analysis be undertaken that accounts for some of the social benefits of economic growth in areas that have historically been bypassed by economic development.</p>	The displacement risk analysis section in the SEIS has been updated to include more discussion on the benefits of economic growth. VISION 2050 acknowledges the need for reducing disparities in access to opportunity (see the Regional Collaboration, Development Patterns, and Economy section policies).
City of Kirkland	3	<p>Utilities/Infrastructure. The SEIS notes that the Transit Focused Growth alternative could reduce the need for new infrastructure compared to the Stay the Course alternative. On its surface, this conclusion is logical, although experience suggests that upsizing infrastructure to accommodate infill growth in urbanized areas may be significantly more resource-intensive and expensive than extending infrastructure to greenfield areas. This means that it may be harder for local governments/agencies to build the infrastructure that may be needed to accommodate increased growth in already-urbanized areas. The SEIS should explore what additional public or private support might be needed to allow for infrastructure development under the Transit Focused Growth Alternative.</p>	Comment acknowledged. A new Regional Collaboration action to investigate new and existing funding sources has been added, as well as one on communicating to the state legislature and agencies on changes to state law and funding needed to advance VISION 2050.
City of Kirkland	4	<p>Affordable Housing. Since housing affordability is critical to achieving any of the growth strategies, and housing affordability continues to be heavily influenced by local decisions, how would declining affordability affect achievement of any of the growth alternatives? Beyond the laundry list of housing streamlining and affordability measures on page 105 of the SEIS, what are the housing affordability assumptions underlying the feasibility of each alternative, and what is expected of local governments in terms of promoting housing affordability and diversifying a housing stock that on a regional scale, at least, primarily comprises single-family units?</p>	The VISION 2050 Housing section includes new and updated policies on housing affordability. New actions to develop a regional housing strategy and provide housing assistance have also been added. The SEIS identifies housing affordability as an issue, but the model is not able to analyze housing affordability by alternative. The SEIS includes information on displacement risk and growth pressures in high-risk areas.
City of Kirkland	5	<p>After having reviewed the SEIS, the City of Kirkland is most strongly in favor of the Transit Focused Growth Alternative (75% of the region’s growth occurring near high-capacity transit), which is most in alignment with the City’s growth strategy. Under this alternative, 57% of growth would be in higher-density settings (compared with 46% for the Stay the Course alternative and 44% for the Reset Urban Growth alternative). The transit alternative also takes less land, would boost transit ridership the most, and would have the most beneficial effects on reducing daily per capita drive time.</p>	The city’s preference for the Transit Focused Growth alternative has been acknowledged.
City of Kirkland	6	<p>One last point: Kirkland is pursuing designation of Downtown as an Urban Growth Center in 2019. Based on discussions with PSRC, that designation would not impact Vision 2050, since the City already has an existing Urban Growth Center. However, we would appreciate a reference to the planned designation in the SEIS and Vision 2050. In addition, we believe that Downtown Kirkland already surpasses the minimum activity unit threshold to qualify for an Urban Growth Center, with appropriate planning policies in place, meaning that Downtown is well-positioned for additional growth and transportation investments.</p> <p>For more information, please contact Adam Weinstein, Director of Planning and Building, at 425-827-3227 or <a href="mailto:aweinstein@kirklandwa.gov">aweinstein@kirklandwa.gov</a>.</p> <p>Sincerely, Kirkland City Council</p>	PSRC staff is coordinating with Kirkland regarding the process to designate Downtown Kirkland as a regional growth center. Since Kirkland includes a regional growth center, the city is already classified as a Core City and growth is allocated to it accordingly. Once designated, a technical amendment can occur to VISION 2050 to show the center. The FEIS for VISION 2050 notes that additional growth centers may be designated over time.

Committer	Comment Number	Comment Text	Response
City of Lake Stevens	1	<p>RE: Lake Steven Draft SEIS Vision 2050 Comment letter</p> <p>Dear Ms. Harris.,</p> <p>Thank you for the opportunity to provide comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for Vision 2050.</p> <p>Since the inception of Vision 2040, the Puget Sound Region has changed dramatically with significant localized population growth, regional investment in transportation infrastructure and expanded employment opportunities. As the Puget Sound Regional Council (PSRC) contemplates updates under Vision 2050, it is critical that the regional plan identifies an equitable distribution of population and employment growth targets to satellite cities and towns not connected to regional transportation spines or growth centers. Cities and towns offer an option to maintain traditional neighborhoods that meet market preferences, provide local growth centers for focused employment supporting local job to housing balances and supply reduced barriers to attainable housing options.</p> <p>Lake Stevens as a community endorses the development of a hybrid approach that includes concentrating significant growth along transit focused areas, but with a greater allocation of growth distributed to cities and towns. The proposed allocation to Metropolitan Cities (Everett), Core Cities (Bothell and Lynnwood) and High-Capacity Transit (HCT) Communities in Snohomish County is too high at the expense of stagnating growth in cities and towns. For example, the Lake Stevens UGA has achieved approximately 70% of its 2035 growth target. A small remnant allocation to cities and towns would negatively influence local economies as demand for services increase. Rather than intensifying allocations to outlying unincorporated rural areas, growth adjustments should be concentrated along the fringes of developed urban growth boundaries, or between UGA boundaries near one another to allow efficient land development and delivery of urban services.</p> <p>As suggested in the SCT comment letter there needs to be flexibility in local goal setting:</p> <p>"SCT believes that the growth figures provided in the RGS should recognize economic fundamentals and realistic timelines for realization of these shifts in future growth distributions. This recognition is warranted given the uncertainties in timing of the necessary urban infrastructure investments and anticipated market responses. As such, the RGS growth allocations should be provided by PSRC as guidance to the subsequent Countywide Planning Policy/local target setting process. The region needs to be able to adopt and adjust when unforeseen shifts in the regional economy occur or growth opportunities in local urban centers in cities and towns change the fundamental assumptions used to establish the growth assignments."</p> <p>For Vision 2050 to be successful, it is imperative that communities working cooperatively under countywide planning policies retain the ability to redistribute local growth targets as appropriate. As a primary pillar of the Growth Management Act, local jurisdictions need to be able to develop comprehensive plans and land use policies that reflect the values of the community while meeting the modeling targets of the regional growth strategy; however, flexibility in application of the model should be a key principle in developing a hybrid model adaptable to actual growth patterns.</p> <p>As endorsed by the Snohomish County Tomorrow Steering Committee, inherent flexibility including consideration of logical UGA boundary expansions that recognize changing population distribution, service areas and natural boundaries should remain options to achieve regional growth targets.</p> <p>Thank you again for the opportunity to comment on the Draft SEIS.</p> <p>Sincerely, John Spencer, Mayor</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for a hybrid approach has been acknowledged. Target setting at the countywide level will provide flexibility and the opportunity to consider the unique circumstances of each jurisdiction. VISION 2050 Regional Growth Strategy policy calls for the long-term stability and sustainability of the urban growth area consistent with the regional vision.</p>
City of Lakewood	1	<p>To Whom It May Concern:</p> <p>These comments are in regard to the Supplemental Environmental Impact Statement (SEIS) for VISION 2050 (V2050.) Thank you for your consideration.</p> <p>As a starting point, it is worthwhile to highlight excerpts from the PSRC 1993 Interlocal Agreement and 2009 Bylaws, both of which make clear that PSRC is intended to do work based on local governments' Comprehensive Plans; it is a "bottom up", not a "top down", entity.</p> <p>PSRC's 1993 Interlocal Agreement Mission Statement:</p> <p>Preserve and enhance the quality of life in the central Puget Sound area. In so doing, it shall prepare, adopt, and maintain goals, policy (sic), and standards for regional transportation and regional growth management in the central Puget Sound area, in accordance with federal and state law and based on local comprehensive plans of jurisdictions within the region. The agency shall ensure implementation in the region of the provisions of state and federal law which pertain to regional transportation planning and regional growth management.</p> <p>PSRC's 2009 Bylaws Purpose Statement:</p> <p>Exercise the authority delegated to it pursuant to the Interlocal Agreement and under federal and state laws as the Metropolitan Planning Organization and Regional Transportation Planning Organization for the central Puget Sound region, and to qualify eligible agencies for programming of federal, state and local transportation projects identified in the Transportation Improvement Program.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. Interlocal Agreement and bylaws excerpts acknowledged.</p>
City of Lakewood	2	<p>Major Military Installations in V2050</p> <p>Lakewood supports the addition of Major Military Installations as a regional geography to V2050. The influences of the presence of Joint Base Lewis McChord (JBLM), Naval Base Kitsap – Bangor, Naval Base Kitsap – Bremerton, and Naval Station Everett cannot be ignored nor underestimated. Lakewood also seconds the statement at page 83 of the SEIS, namely, "Military installations are not subject to planning requirements under GMA or VISION 2040, although Joint Land Use studies have been prepared for some installations in cooperation with surrounding jurisdictions."</p>	<p>Comment noted.</p>

Committer	Comment Number	Comment Text	Response
City of Lakewood	3	<p>Infrastructure Planning</p> <p>Fifteen cities have incorporated in Washington State since 1990, including Lakewood, Edgewood, University Place, Burien, Covington, Federal Way, Kenmore, Maple Valley, Newcastle, Sammamish, SeaTac, Shoreline, and Woodinville within Pierce, King, Kitsap and Snohomish Counties. In most cases, a major reason for incorporation is the lack of organized infrastructure development and service provision over time. These new cities may not own some or all of their utilities or public service providers.</p> <p>Regardless of their incorporation dates, it is important that PSRC acknowledge the fundamental difference in planning and funding for jurisdictions that do versus those that do not own their utilities and public services (water, stormwater, sanitary sewer, electricity, fire service, police service, etc.) Cities that do not own such utilities and services operate very differently from those who do, and have less ability to plan for long-term development and redevelopment. Policies that do not take this fact into account are bound to be difficult or even impossible to implement.</p>	Infrastructure planning information noted.
City of Lakewood	4	<p>SEIS Comments</p> <p>Comments are included below regarding the three proposed regional growth alternatives and mitigations therefor.</p> <p>Section 3.3 Transit Focused Growth Alternative, page 88</p> <p>In Section 3.3, the "Transit Focused Growth" alternative has an explicit goal for 75 percent of the region's population and employment growth to occur within regional growth centers and within a quarter-mile to a half-mile from current and planned investments in high-capacity transit [HCT], including light rail, bus rapid transit, commuter rail, ferries, and streetcar.</p> <p>Comment: This "explicit" goal is unlikely. Existing literature strongly suggests that under the most ideal situations, the highest percentage to be reached is 62 percent. If the best situation is 62 percent, then this alternative is overstating its level of effectiveness and many of the underlying premises need to be re-evaluated<sup>1</sup>.</p> <p>Living near transit does not increase the use of non-car modes for work commutes. Workplace proximity to transit is more influential upon commute and personal trip mode. Locating jobs nearer to transit would be more effective in promoting more non-car usage.</p> <p><sup>1</sup> See Cervero, Robert. (1994). Transit-based Housing in California: Evidence on Ridership Impacts, &amp; Transportation Research Part A: Policy &amp; Practice, Volume 80, October 2015, Pages 277-287.</p>	Based on feedback on the Draft SEIS alternatives, for the Preferred Growth Alternative, the regionwide goal for population growth in regional growth centers and areas within walking distance of high-capacity transit was set at 65%.
City of Lakewood	5	<p>Section 3.4 Regional Growth Alternatives Comparison, page 92</p> <p>Table 3.5-1 provides a summary of the three regional growth alternatives.</p> <p>Comment: Each alternative's population percentages do not show significant difference from one to another. Further, the population distributions need reexamination if they are based on an assumed (and incorrect) 75 percent growth concentrated in HCT communities.</p> <p>Presumably, the PSRC Growth Management Policy Board (GMPB) and ultimately the Executive Board and General Assembly will consider approving a regional growth alternative that is not precisely one of the three presented in the SEIS, but rather a hybrid or edited alternative. Lakewood offers the following two options for consideration by the GMPB:</p> <p>"Slow Growth Alternative": This alternative would restrict growth unless and until transportation and infrastructure concurrency issues are resolved. Many areas of the Central Puget Sound have inadequate water, sewer, and stormwater facilities for their current housing and employment, let alone that anticipated in any of the V2050 growth scenarios; looking into the future, the inadequacies (systems that are old and/or too small) will just increase. Anticipated changes in technologies will increase the load on the electrical grid (e.g., charging an electric bus is roughly equivalent to adding 40 homes to the grid), and little or no planning by regional and local entities to prepare for the increased load. This alternative would take a practical approach to preventing the worsening of infrastructure overload.</p>	The growth alternatives used in the Draft SEIS use a consistent regional growth projection to allow for comparative evaluation between different growth patterns. While a "slow growth" alternative might have proportionately fewer impacts or benefits compared with the alternatives analyzed, it is appropriate for the region to plan for the growth best estimated as a means to address housing, employment, and infrastructure needs.
City of Lakewood	6	<p>"Economic Dispersion Alternative": This alternative would incorporate and expand on the policies and priorities that focus on a better dispersion of job growth throughout the PSRC region included in the September, 2017 Regional Economic Strategy, "Amazing Place." As stated in the Strategy:</p> <p>Amazing Place places new emphasis on opening access to opportunity within all parts of the region, for everyone in the region. A new rural strategy and supporting initiatives are identified. Amazing Place includes new strategies and initiatives to grow new jobs closer to housing. Housing supply has been trailing job growth throughout the region. Amazing Place includes new strategies and initiatives to address housing costs, and sustain the region's competitive edge.</p> <p>Of particular importance are the following strategies:</p> <ul style="list-style-type: none"> <li>-Encourage economic growth across all parts of the region — Sub-regional areas contribute unique strengths and characteristics to the region's collective economy, supported by efforts to grow jobs throughout all areas. The region has seen strong economic growth, but it is not equally distributed throughout the region. Sub-regions have distinct opportunities and challenges requiring different investments and economic development efforts.</li> <li>-Advance economic development within small cities and rural communities — Small cities and rural communities are hubs for small business growth and emerging industry development and are scenic gateways to the region's abundant recreational activities.</li> </ul> <p>Initiatives supported by the regional economic strategy will:</p> <ul style="list-style-type: none"> <li>-Work with jurisdictions with centers to accept anticipated proportional growth and development and continue to support local comprehensive plans that support centers</li> <li>-Support jobs and housing growth in urban areas, regional centers, and cities with investments in infrastructure</li> <li>-Concentrate industrial business activity within Manufacturing and Industrial Centers regionwide and appropriate industrially zoned areas</li> <li>-Encourage land use and transportation plans to support job retention and creation and economic development in all communities</li> </ul>	Although PSRC cannot force employers to locate jobs in specific places, VISION 2050 and the preferred growth strategy support the distribution of employment growth across the region in several ways. It shifts the allocation of employment growth from King County to the other counties by 5%. VISION 2050 contains policies to support shared widespread prosperity, living wage jobs, and the planning and conditions that help to create those opportunities. VISION 2050 also contains regional actions to provide support for local economic development planning efforts.

Commenter	Comment Number	Comment Text	Response
		<p>Out of all PSRC jurisdictions and geographic areas, King County has seen the vast majority of economic and job growth in recent years, but slow housing growth by comparison. Other counties' data demonstrate the opposite trend:</p> <p>[Chart] Source: PSRC Population &amp; Total Employment Estimates</p> <p>[Chart] Source: U.S. Census –Inflow/Outflow Analysis (2015)</p> <p>[Chart] Source: U.S. Census -ACS 5 Year Estimates</p> <p>These trends cannot continue. Jobs must be dispersed throughout the Central Puget Sound in order to achieve a myriad of desired outcomes, including but not limited to:</p> <ul style="list-style-type: none"> <li>-alleviating transportation pressure;</li> <li>-improving housing affordability near the workplace;</li> <li>-improving the region's economic resiliency following natural disaster;</li> <li>-improving air quality via less transportation congestion; and</li> <li>-ensuring long term financial viability of all counties and all local jurisdictions.</li> </ul> <p>Again, Lakewood submits the "Slow Growth" and "Economic Dispersion" alternatives for consideration by the GMPB as a final regional growth alternative is selected.</p>	
City of Lakewood	7	<p>V2050 MITIGATION MEASURES</p> <p>A number of the mitigation measures in V2050's SEIS include content already addressed in Pierce County's Countywide Planning Policies (CPPs) as well as city policies and regulations; they may be included in other counties' CPPs as well. First, SEIS mitigation measures should not be existing policies/actions for the new proposed outcomes of V2050; new mitigation measures should be proposed for the considered future growth alternatives. Second, there is no need (nor authority) for PSRC to impose a "top down" policy scheme when per its mission, PSRC is intended and authorized to base its work on local Comprehensive Plans. Third, by identifying preexisting CPPs as mitigation measures for various V2050 issues, is the SEIS demonstrating a bias and assumption that "Stay the Course" will be the selected regional growth alternative?</p>	<p>Mitigation measures were identified to reduce or avoid the impacts of future growth and the Regional Growth Strategy. The VISION 2040 Final EIS, which the VISION 2050 Supplemental EIS builds upon, identifies many of the same impacts, in part due to overlapping time periods. Most of the mitigation measures identified in the VISION 2040 Final EIS are still valid for VISION 2050 and have been repeated. The mitigation measures helped to develop multicounty planning policies for VISION 2040. Countywide planning policies are to be consistent with multicounty planning policies, therefore it is expected that the mitigation measures and countywide planning policies are consistent.</p>
City of Lakewood	8	<p>Section 4.1.3 Potential Mitigation Measures: Housing and Employment (Page 105 et seq.)</p> <p>Housing</p> <p>1. Mitigation measure: Encourage planning practices to analyze and track housing issues and needs. Comment: The proposed mitigation measure is overly broad. What kind of specific planning practices are being suggested?</p> <p>2. Mitigation measure: Pursue design guidelines and design approaches for small-lot development, zero lot line development, and reduced setback requirements. Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs AH-5, 5.2, 5.4, 5.4.1, 5.4.2, and 5.4.3.</p> <p>3. Mitigation measure: Encourage regulatory approaches such as zoning changes, minimum density ordinances, performance zoning, and inclusionary zoning. Comment: The Pierce County housing market, as well as those elsewhere, have not supported minimum density ordinances. While many cities do allow higher densities, as much as 100-units per acre, there has been an unwillingness to build such projects unless there is the Smart Growth infrastructure in place needed to support the higher density. This infrastructure is missing in most suburban communities, and, thus, lower densities continue to be the reality.  Lakewood prefers and uses non-mandatory inclusionary zoning practices, including its Multi-Family Housing Tax Exemption program, codified at LMC Chapter 3.64, and its Housing Incentives Programs, including density bonuses, development standard modifications, and fee reductions that are codified at LMC 18A.50.700 et seq.  Inclusionary zoning is itself sometimes a barrier to community support for dense development, particularly in well-to-do neighborhoods. Inclusionary zoning costs government money due to administration and enforcement of the program. There is one exception that has demonstrated results - when inclusionary zoning is voluntary and accompanied by density bonuses. This city's general fund is already significantly burdened, and there is no desire to add on new mandates unless PSRC wishes to fully subsidize such programs.</p> <p>4. Mitigation measure: Provide financial incentives such as fee exemptions, density bonuses, tax credits, or transfer of development rights programs. Comment: PSRC should examine the land use regulations of existing cities before proposing this mitigation. PSRC may be surprised to learn that many of these items are already in place. For example, please see Lakewood Municipal Code 18A.50.700, et seq., and Chapter 3.64. Lakewood already provides fee reductions, density bonuses, voluntary inclusionary housing, development standards modifications, and multifamily tax reductions.</p> <p>5. Mitigation measure: Develop consistent definitions for "affordable," "low-income," and "moderate-income" among jurisdictions. Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs AH-3, 3.1, 3.1.1, 3.1.2, 3.1.3, and 3.1.4.</p> <p>6. Mitigation measure: Encourage the adoption of affordable housing targets by local jurisdictions.</p>	<p>See response above on relationship of mitigation measures to MPPs and CPPs. Many strategies will need further stakeholder input before they can be more specific. For example, a new action to develop a regional housing strategy will require input from cities in the region. Some strategies will not be specific at the regional level in order to leave some flexibility in local implementation. The Lakewood rental housing safety program is a good local example of a strategy to preserve affordable housing. The mitigation measures can be applied to any of the alternatives. Thank you for sharing the Partnership for the Bay's Future resource. A mitigation measure to encourage public-private partnerships and rental safety programs has been added.</p>

Commenter	Comment Number	Comment Text	Response
		<p>7. Mitigation measure: Establish housing targets specific to identified regional growth centers.</p> <p>Comment on measures 6 and 7: There is a problem with the use of the word “encourage” in measure 6 and discussion of housing targets in both measure 6 and 7. “Encourage” suggests that the establishment of housing targets is permissive. What happens when some cities and counties adopt targets and others do not? Would PSRC approve transportation grant awards for those cities and counties that did adopt targets and deny transportation grant awards for those cities and counties that did not? IF there are going to be affordable housing targets incorporated into V2050, then all cities and counties must comply.</p> <p>However, state government and local partnerships - not PSRC - should be setting housing targets based on infrastructure capacity and then helping local governments to meet these targets and improve infrastructure in areas where housing units increase.</p> <p>8. Mitigation measure: Perform regular review and updates to local land use regulations to ensure consistency with affordable housing goals.</p> <p>Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs AH-8 and related sub-categories. Local land use regulation already goes through periodic review as required by both the Washington Department of Commerce and PSRC.</p> <p>9. Mitigation measure: Prioritize regional funding for transportation projects that support affordable housing.</p> <p>Comment: Is this proposed mitigation measure specific to the Transit Focused Alternative, or to any transportation project that supports affordable housing?</p> <p>10. Mitigation measure: Rezone for increased density near transit and services.</p> <p>Comment: PSRC staff is directed to review the land use regulations for those areas designated Regional Growth Centers that have existing transit service in place. It is very likely that these Centers have already rezoned for increased density. This measure, therefore, seems moot.</p> <p>11. Mitigation measure: Increase housing supply with access to employment. Comment: This proposed mitigation measure is overly broad. How does PSRC propose implementation? Is implementation based on market conditions, or is it to be based on governmental policy? This has been a problem in many urban communities and solutions have been hard to identify.</p> <p>The proposed mitigation measure is already in place locally at Pierce County CPPs AH-3 subcategory 3.3, AH-4, and AH-6. The policies exists, but current implementation is lackluster.</p> <p>If the region wants increased housing supply with access to employment, local governments and NGO expert organizations need to form new partnerships or regional housing alliances. This region lacks organized leadership and vision committed to prioritizing housing, and, frankly, PSRC is not - and should not be - the driver. Moreover, large private-sector employers have shown an unwillingness to participate. Greater involvement by the private sector would occur if the housing situation became an employment constraint. To date, that has yet to occur.</p> <p>12. Mitigation measure: Streamline regulations and reduce development restrictions, such as minimum parking requirements.</p> <p>Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs UGA-21 and related sub-categories. UGA-24, and UGA-26.</p> <p>13. Mitigation measure: Increase funding available for affordable housing through federal low-income housing tax credit, local or countywide housing levy, or other similar measures.</p> <p>Comment: The proposed mitigation measure is government-based, which is often asked to do too much with insufficient resources. The proposed measure should be expanded to create a system where there is private sector participation. This private-public approach has been successful in the San Francisco Bay Area: the Partnership for the Bay Area’s Future (<a href="https://www.baysfuture.org/">https://www.baysfuture.org/</a>) has a \$500 million investment fund dedicated to alleviating the capital constraints facing affordable housing development, and one \$40 million grant fund focused on moving forward both tenant protection policies and policies to enable more housing construction.</p> <p>14. Mitigation measure: Prevent displacement and preserve “naturally occurring” affordable housing through sales tax waiver, low interest loans/revolving loan fund for preservation, and code enforcement.</p> <p>Comment: What enabling legislation or administrative regulation grants PSRC the authority to address such an issue?</p> <p>Also, what does PSRC mean when it references the preservation of “naturally occurring” affordable housing? That if a community has existing very low or low income neighborhoods, these must be preserved? Does PSRC not recognize that many of these neighborhoods were established by the “red-lining” (a discriminatory practice by which banks, insurance companies, etc., refuse or limit loans, mortgages, insurance, etc. within specific geographic areas) practices in years past and remain legacy issues for many communities? Is not this mitigation measure actually exclusionary in nature because it allows jurisdictions to keep low income housing within its existing boundaries? What mitigation measures does PSRC propose to bring affordable housing into more affluent neighborhoods?</p> <p>Lakewood has established a very successful rental housing safety program designed to ensure that all rental housing units comply with specific life and fire safety standards and are providing a safe place for tenants to live. All rental properties owners are required to register their property with the City every year and have the property inspected once every five years. This program is a real world, effective way to preserve affordable housing wherever it may occur within the City’s boundaries.</p> <p>15. Mitigation measure: Pursue tenant protections by providing multi-jurisdiction support for local enforcement of codes and affordability, support local implementation and enforcement to prevent source of income discrimination, and create legal defense fund for local jurisdictions.</p> <p>Comment: Please see the comments for measure 14 above. Measure 15 is basically stating that if you’re poor, it’s okay to live in a substandard unit. Lakewood opposes this philosophy; everyone has the right to live in a decent structure. The City will use its building and fire codes, as adopted by Washington State, to enforce basic health and safety provisions. City will comply with Tenant/Landlord Law as adopted by Washington State. City opposes the creation of a legal defense fund given the success of techniques and programs such as Lakewood Rental Housing Safety program.</p> <p>This mitigation measure also fails to address the increased administrative costs that these programs entail.</p>	

Commenter	Comment Number	Comment Text	Response
		<p>16. Mitigation measure: Assess, monitor, and report housing data and trends.  Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs  AH-8, related sub-categories.</p> <p>17. Mitigation measure: Encourage wider range of affordable housing for seniors and special needs populations, and housing that accommodates a variety of family sizes.  Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs  AH-8, related sub-categories.</p>	
City of Lakewood	9	<p>Employment</p> <p>1. Mitigation Measure: Preserve adequate land at reasonable cost for land-intensive commercial industries.  Comment: The proposed mitigation measure is unrealistic. It seems to assume that many communities have surplus lands. For built-out communities, that is not the case and the cost of land which may be available will be dictated by the market.</p> <p>2. Mitigation measure: Support established and emerging industry clusters.  Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs  Ec-2, sub-category 2.9.</p> <p>3. Mitigation measure: Support businesses, ports, and agencies involved in trade-related activities.  Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs  Ec-1, sub-category 1.8.</p> <p>4. Mitigation measure: Provide a supportive environment for business startups, small businesses, and locally owned businesses.  Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs  Ec-2, sub-category 1.12.</p> <p>5. Mitigation Measure: Invest in infrastructure that connects designated centers. Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs Ec-5, sub-category 5.8.</p> <p>6. Mitigation Measure: Promote economic activity and employment growth that sustains diversity of family wage jobs.  Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs Ec-2, sub-categories 2.1 and 2.6.</p> <p>7. Mitigation Measure: Support a high-quality education system and training programs. Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs education policies, beginning on page 36</p> <p>8. Mitigation Measure: Support economic activity and employment in rural and natural resources areas compatible with those lands.  Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs  Ec-6, subcategories 6.9 and 6.10.</p>	See responses above.
City of Lakewood	10	<p>Section 4.2.3 Potential Mitigation Measures (Land Use) (Page 115 et seq.)</p> <p>1. Mitigation measure - Local jurisdictions comply with GMA to identify imbalances between growth and infrastructure needs and identify discrete actions to mitigate impacts.  Comment: This is a generalized statement and underscores the problem cities like Lakewood have with inadequate existing infrastructure, historical land use patterns, and governance issues. Sufficient capital funds are not available to establish the High Capacity Transit (HCT) community that is envisioned in this SEIS. The problem is exacerbated by the fact that Lakewood is served by special service districts providing water and sewer, and three power companies. These outside agencies have their own separate pricing structures, and they may not be aligned with current regional growth strategies nor any new policies proposed by PSRC at some future date. Jurisdictions that incorporated after partial or full build-out and/or do not own their utilities are at a unique disadvantage when engaged in long term land use planning since they do not control how infrastructure is developed, upgraded, or maintained. This measure should be edited to recognize that.</p> <p>2. Mitigation measure - Encourage "green" building practices.  Comment: The V2050 SEIS may want to recognize current state energy code requirements, which by default result in green building practices. (See Washington State Energy Code, Residential Provisions, Chapter 51-11R WAC, and the Washington State Energy Code, Commercial Provisions, Chapter 51-11C WAC.)</p> <p>3. Mitigation measure - Implement centers development to accommodate growth. Comment: Centers development is being incorporated into Countywide Planning Policies.  Centers are designated in existing Comprehensive Plans. Subarea plans have been established to support Centers.</p> <p>4. Mitigation measure - Promote design standards to make dense development more attractive and compatible with existing development.  Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs  CU-4, HAC-4, and UGA-15</p> <p>5. Mitigation Measure: Improve long-range planning for unincorporated areas.  Comment: Proposed mitigation measure is overly broad. Please provide specific information on what PSRC desires.</p>	See responses above. Due to infrastructure challenges experienced throughout the region, provisions have been added to the Regional Collaboration section of VISION 2050 to investigate existing and new funding sources and communicate with state agencies and the legislature to assist local governments with the implementation of VISION 2050.

Commenter	Comment Number	Comment Text	Response
		<p>6. Mitigation measure: Site schools and institutions in a way that reinforces growth management objectives.  Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs Ed-3, Ed-4, Ed-5, and Rur-19.</p> <p>7. Mitigation measure: Promote transportation investments that serve increased population and employment.  Comment: To be clear, promoting transportation investments means fixing existing transportation deficiencies, particularly since these growth alternatives are assuming increased densities in existing jurisdictions via upzoning. A more accurate mitigation measure would be to recognize those cities and counties which have Transportation Improvement Plans (TIPs) in place that closely match PSRC's anticipated transportation investments. Additionally, the regional transportation investment strategy should include a program to address deferred maintenance issues on the region's existing streets and highways.</p> <p>8. Mitigation measure: Promote higher densities near transit and encourage transit-oriented development.  Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs</p> <p>11.4.1. Further Lakewood has established a transit oriented zoning district which promotes density at 54 dwelling units per acre, and undoubtedly other jurisdictions have taken similar action. Lakewood has also adopted (and PSRC has certified) a Downtown Subarea Plan that includes a transit station and plans for residential and mixed use densities of up to 100 units per acre</p> <p>9. Mitigation measure: Develop center and transit-station subarea plans  Comment: Subarea plans are time consuming and expensive, often upwards of \$500,000. If PSRC wants to support the promulgation of subarea plans, then it should financially support their development and implementation. Lakewood has also adopted (and PSRC has certified) a Downtown Subarea Plan that includes a transit station and plans for residential and mixed use densities of up to 100 units per acre. Future planning efforts may include a new neighborhood or subarea plan around the Sound Transit Station.</p> <p>10. Mitigation measure: Integrate environmental review and mitigation into the subarea planning process.  Comment: Integration makes the most sense through the adoption of planned action ordinances (PAOs) with subarea plans. This is a standard process that is already occurring amongst municipalities, including Lakewood's recent adoption of a PAO along with its Downtown Subarea Plan.</p> <p>11. Mitigation measure: Conduct community participation and visioning exercises to help guide planning, development, and investments.  Comment: This mitigation measure states the obvious and is unnecessary. RCW 36.70A.035 requires that each Washington city and county establish a public participation program and procedures for amendments, updates, and revisions of comprehensive plans and development regulations.</p> <p>12. Mitigation measure: Provide amenities such as parks, plazas, trails, waterfront access, and cultural centers in denser areas to increase livability.  Comment: There are already numerous policies within the Pierce County CPPs that address parks, plazas, etc. Please review Policy UGA-18. Many of the recently adopted subarea plans include open space provisions. Additionally, cities and counties are required to have polices which address open space in their existing parks master plans.</p> <p>13. Mitigation measure: Pursue measures that increase residential capacity (e.g., permit Accessory Dwelling Units, provide multifamily housing tax credits and density bonuses  Comment: Lakewood and many other cities allow accessory dwelling units and density bonuses, have a housing tax credits program, and permit additional housing types in single-family zones.</p> <p>14. Mitigation measure: Encourage infill and redevelopment.  Comment: Lakewood is a built-out community. All development is infill or redevelopment. However, as with most cities, Lakewood faces significant infrastructure deficits. The problem is made more acute since most of the City's utilities are provided through special service districts, and three separate power purveyors. Concentrating a significant portion of this region's growth as "infill" means tough political choices, removing many existing houses and businesses, and is not popular with the public. Further, PSRC should recognize that the economy is market-based. "Infill" living does not suit all tastes (e.g., too much noise, less privacy, no back yard, bad air quality, no access to open space, etc.) The quality of schools is also critical, which is often forgotten in "infill" discussions. If the schools are poor, families will not locate to an area.  This proposed mitigation measure is lacking. More astute mitigation measures related to infill would:  <ul style="list-style-type: none"> <li>-preserve local flexibility and community input;</li> <li>-direct the state to provide incentives and priority for infill development;</li> <li>-develop new resources and financing tools to fund transit, affordable housing, brownfield clean up and infill related planning;</li> <li>-develop major dedicated, stable funding sources to support infrastructure expansion and repair water, sewer, roads, rail line, bridges, seismic, bike paths, and urban parks;</li> <li>-refrain from imposing additional mandates on local agencies;</li> <li>-match state school funding and policies with infill objectives;</li> <li>-work with schools to encourage participation in local planning, co-location of facilities and review of facility and site requirements; and</li> <li>-ensure cities have the resources to solve their infill challenges.</li> </ul> </p> <p>15. Mitigation measure: Develop or strengthen brownfields programs.  Comment: Existing brownfields have been identified by many jurisdictions; however, there are insufficient funds at both the local and the state level to address remediation.</p> <p>16. Mitigation measure: Apply development standards that limit and mitigate car-dependent land uses.</p>	

Committer	Comment Number	Comment Text	Response
		<p>Comment: Some governmental actions have been established to address this concern. However, this mitigation measure is generally in conflict with current market conditions and stands little chance of success.</p> <p>17. Mitigation measure: Incorporate design standards that enhance walkability and character. Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs CU-1; HW-1; HW-4; Env-11; 7.2; UGA-13; UGA-20; and UGA-38.</p> <p>18. Mitigation measure: Encourage developers to reduce off-street surface parking. Comment: A reduction in off-street parking is found in Pierce County CPP UGA-21. If similar polices already exist in other counties' CPPs, then this mitigation measure should be removed.</p> <p>19. Mitigation measure: Use Transfer of Development Rights [TDR] programs to encourage compact and clustered development. Comment: TDRs programs work when they designate locally appropriate receiving areas and offer development bonuses that developers actually want and need. In addition, successful TDR programs require at least one of the following three characteristics: strict sending-area regulations, market incentives, and/or few ways for development to gain bonus density without using TDR. TDRs take time, and require extensive city resources. They are not always an effective means to address compact development.</p> <p>20. Mitigation measure: Promote programs such as farmers markets to increase consumption of locally grown products. Comment: Lakewood and many cities already have farmers markets in place. As a result, there is increasing competition between these markets, and not enough farmers or customers to participate in all of them.</p> <p>21. Mitigation measure: Provide for programs to acquire designated critical areas as public lands. Comment: The proposed mitigation is overly broad; however as a point of reference, Lakewood has protected critical areas by a number of means, including creating partnerships with other agencies, outright land acquisition, and zoning state properties and flood prone areas as open space. This works best when local agencies have flexibility.</p>	
City of Lakewood	11	<p>Section 4.3.3 Potential Mitigation Measures: (Transportation) (Page 123)</p> <p>1. Mitigation measure: Encourage jurisdictions to integrate technology-based mobility options (including connected and autonomous vehicles) into existing transportation systems and plans. Comment: If adopted, this measure assumes a significant change in the way in which transportation systems would be funded in the future. Existing transportation revenue sources are declining and expected to continue to decline. This measure would encourage usage-based charging, car sharing systems, trip-based or per-use fees, and monetizing mobility data; these options fly in the face of public disclosure and raise concerns with privacy.</p> <p>2. Mitigation measure: Promote land use development patterns—such as transit-oriented development—that shift trips from driving alone to transit, walking, or biking. Comment: Lakewood and other jurisdictions have multiple goals and policies in place already supporting this proposed mitigation measure; it seems to be unnecessary “top down” planning.</p> <p>3. Mitigation measure: Where the street grid is not connected, add non-motorized connections where possible. Comment: Funding for these types of improvements is reliant on the availability of transportation grant funding. Since its incorporation in 1996, Lakewood has been pursuing the establishment of non-motorized connections; as a jurisdiction that incorporated long after development occurred, the city is significantly deficient in this area.</p>	Comments noted. See responses above.
City of Lakewood	12	<p>Section 4.4.3 Potential Mitigation Measures: Air Quality (Page 126 et seq.)</p> <p>1. Mitigation measure: Encourage local jurisdictions to develop greenhouse gas reduction targets, programs, and policies. Comment: Lakewood does not own its water, sewer, and power facilities or utilities. It also contracts for waste disposal. As a result, its ability to implement this type of a measure is significantly limited. Other jurisdictions with similar infrastructure ownership schemes suffer the same challenges. Programs the City current offers: support farmer’s markets; support for community gardens and home gardens; water-efficient landscaping requirements for new development; transportation demand management policies and codes; investment into code enforcement; new lighting study; replacement of street lights with energy-saving devices; complete streets policies; safe routes to schools; coordinated land use and transit planning; tree protection on private property; and the planting of trees on public properties.</p> <p>2. Mitigation measure: Consider proximity to sensitive populations (children, elderly) in siting development and transportation infrastructure. Comment: The proposed mitigation measure seems unnecessary and a review of comprehensive plans throughout the region would likely reveal jurisdictions already have such mitigation measures in place. For example, Lakewood has a significant number of existing goals and policies: Goal LU-45, and related polices; Goal LU-52 and related policies; Goal LU-53 and related policies; Policy PS- 1.3; PS- 10.6; Goal PS-20 and related policies.</p>	Comments noted.
City of Lakewood	13	<p>Section 4.5.3 Potential Mitigation Measures: Ecosystems (Page 132)</p> <p>1. Mitigation measure: Implement the Regional Open Space Conservation Plan (ROSCP) (PSRC 2018j) at the local level. Comment: According to the existing plan, the primary ownership of open space is found under federal (51 percent), and state ownership (23 percent). Per the 2018 ROSCP, about 70 percent of the regional open space network has long-term protection through public ownership and conservation easements. The regional open space network covers about 3.03 million acres of public and private land and 339 miles of trail. Approximately 2.13 million acres of open space in the region are owned outright by public, tribal, or conservation organizations. The federal government is the largest open space owner in the region; approximately 1.16 million acres of regional open space are held by several different U.S. departments and agencies. Habitat and natural areas are also protected by military installations that occur throughout the region. Washington state</p>	Comments acknowledged. Mitigation measures and multicounty planning policies are often implemented at the local level as appropriate for local conditions.

Commenter	Comment Number	Comment Text	Response
		<p>owns and manages approximately 356,000 acres of open space in the region, including 24 state parks. County-owned open space in the region covers approximately 69,700 acres.</p> <p>Rather than focus on the cities, where ownership of open space is quite small, a better approach would be for PSRC to focus its attention on federal and county land acquisition and preservation efforts. Farmland, forest lands, and resource lands are rural land uses regardless of ownership.</p> <p>2. Mitigation measure: Encourage use of drainage systems that mimic natural systems (e.g., vegetated swales and rain gardens).</p> <p>Comment: These types of drainage systems are generally unnecessary in Lakewood and others with similar soils. The soils are such that water seeps into the existing groundwater tables without the artificially-created systems described in the proposed mitigation measure. The measure could be edits to state “Where needed, encourage use of . . .”</p> <p>3. Mitigation measure: Locate, design, and maintain stormwater management facilities to maximize benefits to pond-breeding amphibians (Wind 2015).</p> <p>Comment: This measure is vague and its implementation costs and requirements are unclear. Is the intent to have amphibians living in artificial ponds? To have stormwater fed into naturally occurring ponds? To change infrastructure planning and funding allocations to accommodate this measure? Its effects could well outweigh its benefits and Lakewood is opposed to it.</p> <p>4. Mitigation measure: Promote the preservation of on-site native vegetation, particularly mature trees.</p> <p>Comment: Local jurisdictions existing regulations already in place (e.g. Lakewood’s LMC Chapters 18A.30, 18A.40 and 18A.50) that perform this function and make this mitigation measure moot.</p>	
City of Lakewood	14	<p>4.6.3 Potential Mitigation Measures: Water (Page 137)</p> <p>1. Mitigation measure: Control land use in areas susceptible to groundwater contamination. Comment: The proposed mitigation measure is unnecessary. The 1996 amendments to the federal Safe Drinking Water Act require states to implement Source Water Assessment Programs. The state Department of Health Office of Drinking Water (ODW) has been assigned primacy for the federal drinking water program in Washington. This office is responsible for implementing requirements. Under existing state rules (WAC 246-290-135) Washington’s federally regulated public water systems (Group A systems) already are conducting wellhead protection programs and/or watershed control programs. All “ground-water-using” systems also are required to submit a susceptibility assessment to ODW as part of their wellhead protection program.</p> <p>2. Mitigation measure: Consider green development standards.</p> <p>Comments: Green building standards are currently found in the International Construction Code and Energy Code as adopted by the state of Washington that exceed green building requirements and voluntary efforts throughout much of the country. Examples include energy conservation, use of water saving fixtures, and dedicated outdoor air systems. The requirement to utilize low impact development “wherever feasible” is also in place per NPDES regulations and WA PCHB decisions (e.g., Pierce County v. Ecology; City of Tacoma and City of Seattle, Intervenor, Case No. P12-093c.) The City is not opposed to green development standards so long as they are practical and do not inordinately increase construction costs.</p> <p>3. Mitigation measure: Reduce need for additional or expanded roadways.</p> <p>Comment: Having incorporated decades after development began in its area, Lakewood is deficient in basic infrastructure, including roadways. In some situations, new roadways are needed to meet public health and safety requirements. Many existing roadways lack curb, gutter, and sidewalk, or are deficient in right-of-way space. The City is opposed to this proposed mitigation if it means that it is precluded from making improvements for the reasons stated above.</p> <p>4. Mitigation measure: Retrofit (with updated stormwater controls) areas and transportation facilities not likely to be redeveloped in the near term.</p> <p>Comment: The proposed mitigation measure is unnecessary. This type of work is already underway throughout PSRC’s region as part of an existing NPDES permit administered by the Washington State Department of Ecology. Many cities, counties and state agencies have been retrofitting existing facilities for many years.</p>	Comments noted.
City of Lakewood	15	<p>Section 4.7.3 Potential Mitigation Measures: Public Services and Utilities (Page 140 et seq.)</p> <p>General</p> <p>1. Consider developing best management practices and model policies for cities and counties to easily adopt.</p> <p>Comment: These policies would be irrelevant to certain jurisdictions, including Lakewood, unless they address issues for cities that do not own their utilities. Any BMPs or model language should anticipate such issues.</p> <p>Water, Sanitary Sewer, Stormwater</p> <p>1. Improve urban water management and install permeable pavement, drought-tolerant landscaping, and water-efficient fixtures</p> <p>2. Encourage green infrastructure: design rooftops to capture rainwater, install rain gardens</p> <p>Comment for measures 1 and 2 above: Green building standards are currently found in the International Construction Code and Energy Code as adopted by the state of Washington that exceed green building requirements and voluntary efforts throughout much of the country. Examples include energy conservation, use of water saving fixtures, and dedicated outdoor air systems. The requirement to utilize low impact development “wherever feasible” is also in place per NPDES regulations and WA PCHB decisions (e.g., Pierce County v. Ecology; City of Tacoma and City of Seattle, Intervenor, Case No. P12-093c.) The City is not opposed to green development standards so long as they are practical and do not inordinately increase construction costs.</p> <p>Pierce County CPPs already address green building practices at Env-31.3.1.</p> <p>Other Services</p>	Comments noted.

Committer	Comment Number	Comment Text	Response
		<p>1. Encourage proactive collaboration between cities, counties, school districts, and other special service districts to understand capacity needs and support development sites for new schools and other facilities</p> <p>Comment: Regardless of whether PSRC is involved in or encouraging interagency communications, local governments have long engaged in communications with special districts and school districts. This measure is unnecessary and an overreaction to a single event (the placement of a high school in the rural area following state authorization to do so.)</p>	
City of Lakewood	16	<p>Section 4.8.3 Potential Mitigation Measures: Parks and Recreation Resources (Page 145)</p> <p>1. Implement the Regional Open Space Conservation Plan, including the following:</p> <ul style="list-style-type: none"> <li>-Incorporate open space conservation into all levels of planning</li> <li>-Protect remaining key habitat areas</li> <li>-Support urban open space and increase access to nearby open space for urban residents</li> <li>-Build a regional trail network</li> <li>-Enhance stewardship on open space lands</li> <li>-Restore habitat in high-value areas</li> <li>-Coordinate planning among and within agencies, jurisdictions, Tribes, and organizations</li> <li>-Engage the community to ensure that new and upgraded facilities meet their needs</li> <li>-Build multi-benefit green infrastructure, such as stormwater parks and river trails</li> </ul> <p>Comment: This measure is a mandate and includes items with significant financial costs. Unless PSRC is able to provide funding to jurisdictions for implementation, this measure should be removed or made voluntary.</p> <p>Lakewood (as well as many other PSRC cities) have Parks Plans that include locally determined and citizen supported park and open space priorities that take precedence over the ROSCP. (See, e.g., the 2014 Lakewood Parks Legacy Plan, which was developed as the Lakewood Parks, Recreation and Community Services Department worked closely with a 17-member Legacy Team to develop a 20-year strategic plan to meet the future park and recreation needs of the community. The diverse team represented many different needs and interests of the City's residents.)</p>	Comments noted. VISION 2050 includes multicounty planning policies and actions to support the implementation of the Regional Open Space Conservation Plan.
City of Lakewood	17	<p>Section 4.9.3 Potential Mitigation Measures: Environmental Health (Page 148)</p> <p>Human Health</p> <p>1. Encourage jurisdictions to perform a community health impact assessment (PSRC 2014b)</p> <p>Comment: The Tacoma Pierce County Health Department collaborated with the County and its cities to develop a countywide health assessment in 2013. Rather than having individual jurisdictions engage in duplicative and repetitive efforts, a better mitigation measure would encourage counties to continue updating their countywide assessments with cooperation from cities. Whether at the county or city level, however, this assessment requires funding that should be identified and secured prior to any jurisdiction being expected to conduct it.</p> <p>2. Support implementation of the Regional Open Space Conservation Plan and develop or preserve green infrastructure, parks, and open spaces in urban areas (see Section 4.8 for additional information)</p> <p>Comment: Please see the comment for Section 4.8.3 mitigation measure above.</p>	Comment noted. VISION 2050 contains multicounty planning policies that support positive community health outcomes.
City of Lakewood	18	<p>Section 4.10.3 Potential Mitigation Measures: Energy (Page 151)</p> <p>1. Promote green building practices for residential, commercial, and infrastructure development</p> <p>Comments: Green building standards are currently found in the International Construction Code and Energy Code as adopted by the state of Washington that exceed both green building requirements and voluntary efforts throughout much of the country. Examples include energy conservation, use of water saving fixtures, and dedicated outdoor air systems. The requirement to utilize low impact development "wherever feasible" is also in place per NPDES regulations and WA PCHB decisions (e.g., Pierce County v. Ecology; City of Tacoma and City of Seattle, Intervenor, Case No. P12-093c.) The City is not opposed to green development standards so long as they are practical and do not inordinately increase construction costs.</p> <p>Pierce County CPPs already discuss green building practices at Env-31.3.1.</p>	Comment noted.
City of Lakewood	19	<p>Conclusion</p> <p>As mentioned at the start of this letter, both the PSRC 1993 Interlocal Agreement and 2009 Bylaws make clear that PSRC is intended be a "bottom up," not a "top down," entity. Unfortunately, whether they are existing mitigation measures from VISION 2040 or proposed new measures for VISION 2050, many measures in the SEIS demonstrate a "top down" mentality and Lakewood opposes them as outside the authority of- and intent for - PSRC.</p> <p>Thank you for the opportunity to provide comment on the SEIS for VISION 2050.</p>	Comment noted.

Commenter	Comment Number	Comment Text	Response
City of Lynnwood	1	<p>Dear Ms. Harris:</p> <p>The City of Lynnwood very much appreciates the opportunity to comment on the Draft Supplemental Impact Statement (DSEIS) for VISION 2050. The City of Lynnwood has been a partner with Puget Sound Regional Council (PSRC) for many years and is glad to continue this relationship to plan for future growth within South County and around our region. As one of two Core cities within Snohomish County, and with the pending construction and anticipated opening of Sound Transit's Lynnwood Link Extension, Lynnwood anticipates significant population and employment growth in the next 30-year planning period.</p> <p>Preferred Alternative – Transit Focused Growth</p> <p>The City of Lynnwood definitively supports the Transit Focused Growth alternative1 as the preferred alternative to be evaluated in the Final SEIS for the VISION 2050 Plan. This alternative is the most consistent with the City's goals and policies as supported in the Comprehensive Plan, as well as other supportive sub-area plans and goals. As the preferred alternative, this will allow Lynnwood to continue to support new and re-development to occur within our Regional Growth Center and City Center areas, as well as within high-capacity transit areas (Community Transit (CT) SWIFT stations) along Highway 99. Lynnwood's vision of directing growth in these areas, creating a more walkable, urban center and protecting existing single-family neighborhoods, is well-rooted and would allow the City's development pattern to continue as has been planned for the last two decades.</p> <p>1 Transit Focused Growth alternative – One of three recommended growth alternatives as defined in PSRC, which assumes compact growth pattern with accelerated growth near existing and planned high capacity transit investments, including light-rail, bus rapid transit, commuter rail, and ferry terminals. Largest share of growth would be focused to Metro Cities (Everett), Core Cities (Lynnwood, Bothell) and High-Capacity Transit (HCT) Communities.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for the Transit Focused Growth alternative has been acknowledged.
City of Lynnwood	2	<p>Support of affordable and 'missing middle' housing</p> <p>City of Lynnwood staff has analyzed all three alternatives and have noted that there will be limited allowance of moderate-density housing options. The supported Transit Focused Growth Alternative would potentially provide the opportunity of moderate-density housing in some capacity. Lynnwood plans allow for moderate-density housing in the range of 12-20 dwelling units per acre, while high-density allows for 20-43 units per acre. Most of the zoning within close proximity of the City's transit facilities, as identified above, allow for higher-density units. Moderate-density units, also known as 'missing middle' housing (duplexes, triplexes, fourplexes, townhomes, condominiums) allow for individuals to live in more affordable options of housing. The DSEIS should further analyze moderate-density housing and determine whether increased allowances for the Transit Focused Growth alternative should be considered, especially for Core cities such as Lynnwood. Lynnwood would also support local flexibility to allow for more moderate-density housing within identified targeted areas.</p>	Increasing the proportion of moderate-density housing is an important strategy and VISION 2050 supports increased development of missing middle housing (see Development Patterns and Housing sections). PSRC's model for developing allocations by alternative uses the zoning currently in place. Modelling results show that the Transit Focused Growth alternative resulted in the greatest amount of moderate density housing. However, jurisdictions can increase middle density housing by allowing more of it in their zoning codes.
City of Lynnwood	3	<p>Jobs/Housing Balance</p> <p>The City of Lynnwood supports the employment re-allocation of 5% of King County's employment growth to outlying counties, including 2% to Snohomish County. This action benefits Lynnwood's Regional Growth Center and encourages employment to be dispersed closer to populated areas. This re-allocation is also supported by the bus rapid transit system developed by Community Transit, including the Orange Line that serves Lynnwood's Regional Growth Center and City Center areas.</p>	Comment acknowledged.
City of Lynnwood	4	<p>Expansion of Urban Growth Areas (UGAs)</p> <p>The City recognizes the County's desire to annex urban unincorporated lands within Snohomish County, as there are benefits to providing urban services. Lynnwood supports future annexations within existing designated UGAs but recommends the Final SEIS discuss whether expansion of existing UGAs (i.e. northward toward Mukilteo) should be considered, recognizing the growth pattern of the Transit Focused Growth Alternative, in particular Core Cities such as Lynnwood.</p> <p>Unincorporated Urban Lands and HCT Communities</p> <p>Lynnwood recognizes that Snohomish County is considering a shift of population from HCT communities to urban unincorporated and rural areas under the Transit Focused Growth alternative. This decision could affect areas within Lynnwood's Municipal Urban Growth Area (MUGA). Before this is considered, City of Lynnwood requests that the Final SEIS analyze impacts of additional growth in the urban incorporated areas on adjacent cities as well as impacts for future growth capacity if/when these areas are annexed within the City of Lynnwood.</p> <p>Growth in relation to HCT service</p> <p>As previously noted, the Transit Focused Growth alternative focuses on compact and accelerated growth nearest to existing and planned high capacity transit investments. The City will experience significant development growth adjacent to and near (within 0.5 mile) of the Lynnwood Transit Center/Future Lynnwood Link Extension Station within the next 5-15 years. Future growth will also likely occur in the Regional Growth Center, especially along the bus rapid transit line (CT Orange Line). However, additional long-term growth may not be anticipated beyond 15 years until future light rail stations are developed, specifically West Alderwood and Ash Way (Lynnwood MUGA). Lynnwood supports a Final SEIS analysis that establishes a range of intermediate growth allocations that would allow jurisdictions to monitor growth relative to operation of future high-capacity transit services, as noted above.</p> <p>In closing, Lynnwood will continue to be a regional leader in the Puget Sound and in South County, and fully supports PSRC in developing VISION 2050 and working toward final adoption of the Plan. The City of Lynnwood thanks you for the opportunity to comment on a preferred alternative. Please contact Todd Hall, Planning Manager if you wish to follow-up on this letter.</p> <p>Sincerely, Nicola Smith, Mayor</p>	The SEIS alternatives assume that forecasted growth can be accommodated in the existing UGA. Impacts of expanding the urban growth areas would be similar to the impacts described for growth in rural areas (see land use impacts section). The Final SEIS analyzes the Preferred Growth Alternative, which incorporates some of the shifts between HCT Communities and Urban Unincorporated mentioned. Target setting at the countywide level will provide the opportunity to consider the unique circumstances of each jurisdiction, including the arrival of high-capacity transit.

Commenter	Comment Number	Comment Text	Response
City of Marysville	1	<p>Dear Ms. Harris</p> <p>Thank you for the opportunity to comment on the Draft SEIS for VISION 2050.</p> <p>Arlington Marysville Manufacturing Industrial Center</p> <p>The City of Marysville is excited about the Arlington Marysville Manufacturing Industrial Center regional Industrial Growth Center designation moving through the process with action scheduled for June 27, 2019 by the Executive Committee. The cities of Arlington and Marysville have been working together for several years to achieve this recognition and now that it is scheduled for action it is great that this Manufacturing Industrial Center designation can be a part of the VISION 2050 plan. We ask that as a part of the VISION 2050 plan that the Arlington Marysville Manufacturing Industrial Center regional Industrial Growth Center designation be shown and that it be described how this Manufacturing Industrial Center will benefit Snohomish County and the Region along with the other regionally recognized Manufacturing Industrial Centers. It is very important for the entire region that all the Manufacturing Industrial Centers are successful.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The Cascade Industrial Center is identified in VISION 2050 and the Final SEIS.</p>
City of Marysville	2	<p>High Capacity Transit</p> <p>As a proposed High Capacity Transit Community, we look forward to Community Transit's expansion of its bus rapid transit system into Marysville which will serve the community on a north south route including serving the Manufacturing Industrial Center. This will be an important link to the regional transit system to the south in Everett. We support this planned expansion of service to serve jobs and housing and think an analysis of the benefit of this new route to north Snohomish County is important.</p>	<p>Comment acknowledged. Planned bus rapid transit routes were included as transportation system assumptions in the model for the SEIS analysis.</p>
City of Marysville	3	<p>Improve Jobs and Housing Balance</p> <p>Marysville is supportive of the employment reallocation of King County's employment growth to outlying counties, including to Snohomish County. Something greater than the proposed 5% from King County and 2% to Snohomish County should be considered. This action would benefit the Arlington Marysville Manufacturing Industrial Center and reinforce the opportunity for employees to be able to take advantage of the lower cost of housing in Marysville and the surrounding communities. Hopefully this will reduce the travel demand to King County and can be reviewed as a part of the final EIS.</p>	<p>PSRC's employment forecasts are based on an econometric model. Shifting 5% of employment from King County to other counties would take significant efforts. If Snohomish or other counties update economic development plans in a way that supports job growth that would exceed that level, the regional forecast can be reconsidered.</p>
City of Marysville	4	<p>Population Growth Targets</p> <p>Population growth targets need to have some flexibility into the future as the market determines where growth will occur over time. As the HCT Communities population allocations are developed in the Countywide Planning efforts, it would be good for an understanding to exist that there is the need to consider that aspirational goals are affected by many factors which are beyond the control of local government. There is also the need for infrastructure improvements to support growth along with the land being available for development.</p> <p>Sincerely Jon Nehring Mayor City of Marysville</p>	<p>Target setting at the countywide level will provide flexibility and the opportunity to consider the unique circumstances of each jurisdiction, including development capacity.</p>
City of Mercer Island	1	<p>RE: Comment on Vision 2050 Draft Supplemental EIS</p> <p>Dear Mr. Inghram and Ms. Harris:</p> <p>Thank you for providing the Draft Supplemental Environmental Impact Statement (Draft SEIS) for VISION 2050 and the opportunity for comment. The City recognizes that the Vision 2050 planning documents will thoughtfully guide the region's management of the anticipated growth in the four counties.</p> <p>In reviewing the Draft SEIS, the City has concluded that three different levels of analysis are useful to aid in evaluating anticipated environmental impacts: regional (i.e. the four counties), countywide, and local (i.e. city specific). The Draft SEIS should provide an impartial discussion of all significant environmental impacts and identify mitigation measures that would avoid or minimize adverse impacts (WAC 197-11-400). The Draft SEIS effectively evaluates the regional and county level impacts; however the Draft SEIS appears to neglect discussion of reasonably foreseeable local impacts.</p> <p>In summary, the City believes that the Draft SEIS neglects to provide sufficient information, discussion, and analysis of possible mitigation related to reasonably foreseeable impacts at a local level to: A) transportation, infrastructure, and public service; and B) residential character (land use and housing).</p> <p>In particular, the City of Mercer Island recommends that the Draft SEIS provide additional information, discussion, and analysis related to:</p> <p>1) Analysis of transportation, infrastructure, and public service impacts</p> <p>A. The Draft SEIS indicates that average daily vehicle miles per resident are projected to decrease, annual transit boardings to increase, and mode shares to shift toward non-automobile alternatives under the Transit-Focused Growth alternative, as supported by the data Appendix B. However, in order to more fully understand the potential impact to transportation systems, the City would find it helpful to see the environmental analysis amended to include projections of absolute increases in miles driven under the alternatives. The City is concerned that an overall increase in the total number of additional vehicle trips—although projected to be shorter in length and fewer in proportion to other modes—may have a significant impact on local infrastructure and levels of service. This additional information would aid in the meaningful evaluation of the eventual preferred alternative.</p> <p>B. The Draft SEIS does not sufficiently evaluate the expected impacts to the local provision of public services and utilities, together with local transportation improvements, particularly as related to the "Transit Focused Growth" and "Reset Urban Growth" alternatives. The City of Mercer Island's Comprehensive Plan contains goals and policies that support growth, generally at the rate described in the "Stay the Course" alternative. The environmental analysis should be amended to evaluate the cost of necessary transportation and utility infrastructure and operational investments that are needed to support the population and job growth called for under each growth alternative.</p> <p>Mercer Island is limited in its ability to make needed capital improvements (e.g. transportation, water, and sewer) and provide desired operational public services (e.g. fire protection, police, water, and sewer) concurrently with the population and employment growth planned under the Transit Focused Growth alternative (as an HCT Community). Mercer Island's ability to create a connected inter- and intra-city vehicle network is limited by its rugged topography and geography as an island. Expanding</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. Given the regional scale of alternatives and the large variations in conditions among local areas, the level of detail for the alternatives and environmental analysis has been conducted at a broad programmatic scale. Analysis at the local level is beyond the scope of the Final SEIS. Localized impacts of growth could vary and would depend on more specific actions that would be considered during project-level environmental review. The total daily system vehicle miles traveled for each alternative has been added to Appendix B of the SEIS.</p>

Commenter	Comment Number	Comment Text	Response
		<p>water, sewer, and stormwater infrastructure is similarly difficult. Furthermore, the City's transportation facilities and utility infrastructure contain existing deficiencies and needed improvements cannot be funded by impact fees.</p> <p>The provision of operational public services (public works together with fire and police protection) is largely limited by increasing operational costs that are not matched by increasing revenues.</p> <p>Mercer Island is limited in its ability to raise funds. Property tax revenue cannot keep pace with growing operational costs, and relatively small sales tax revenue due to a limited market for commercial businesses due to our location between two metropolitan cities, both with multiple commercial hubs.</p> <p>A further analysis and discussion of probable significant impacts, currently unaddressed by the Draft SEIS, including reductions and/or failures to provide services at the adopted levels of service should be provided. The purpose of identifying these local jurisdiction level impacts in the Draft SEIS is to identify mitigation that might be necessary to avoid or minimize the impacts, for example, by creating a mechanism to provide additional revenue options.</p>	
City of Mercer Island	2	<p>2) Analysis of land use and housing impacts and residential character</p> <p>The adopted City of Mercer Island Comprehensive Plan (MICP) is aligned with the Regional Growth Strategy set by Vision 2040 (PSRC Certification, December 2016). The adopted MICP Future Land Use Map also designates single-family residential zoning for most areas outside of our Town Center, equivalent to 88% of the Island's land use. The Growth Management Act (GMA) requires that the Housing Element in the MICP ensures the vitality and character of established residential neighborhoods (RCW 36.70A.070(2)). The MICP embraces this direction from the GMA and focuses on preserving existing single-family residential neighborhoods and focusing growth in the Mercer Island Town Center as a major theme in the adopted goals and policies.</p> <p>Town Center zoning allows commercial, mixed-use, and multi-family residential. To accommodate the City's growth target and maintain consistency with Multi-County Planning Policies, Mercer Island opted to direct most of its allocated population and employment growth to Town Center, supporting the policy of preserving neighborhoods zoned for single-family residential development.</p> <p>The Draft SEIS focuses on land use and housing impacts in the context of social equity, providing housing for all economic segments of the population, and related effects on transportation. The Draft SEIS does not provide adequate discussion, analysis, and identification of mitigation (where appropriate) related to the reasonably foreseeable changes at a local level to land use patterns and housing. The Draft SEIS does not discuss reasonably foreseeable impacts to housing patterns associated with the Transit Focused Growth alternative. For example, a shift from single-family homes towards denser residential alternatives such as townhomes or apartments may affect the existing residential character of the City; no discussion or analysis of impacts, or identification of mitigation, is provided. Similarly, a significant shift in land use patterns, as contemplated in the Transit Focused Growth alternative, may result in the new land use patterns that may affect the existing residential character of the City. Potential impacts that may be associated with a shift in housing and land use patterns include a change to the aesthetics of residential character, environmental and tree canopy coverage, and social change.</p> <p>Under the Transit Focused Growth alternative, it appears that Mercer Island would be required to accommodate growth at a greater rate than it has previously. Accommodating this additional growth may require either up-zoning within Town Center or a change to the zoning designation of areas zoned for single-family residential. Rezoning north of the Sound Transit light rail station would be contrary to our policy direction of maintaining high-quality single-family residential neighborhoods.</p> <p>Up-zoning could cause significant impacts to the City's housing supply by leading to a diminished ability for residents to age in place due to displacement from redevelopment. The City would also be challenged to provide concurrent transportation facilities for the reason discussed above.</p> <p>The City of Mercer Island appreciates Puget Sound Regional Council's work to develop a Regional Growth Strategy to inform and guide regional growth while ensuring potential impacts can be mitigated. Thank you again for this opportunity to comment on the Draft SEIS.</p> <p>Regards, Evan Maxim Director of Community Planning and Development City of Mercer Island</p>	Affects on residential character was added to Section 4.2. Mitigation for this topic is considered broadly throughout the Final SEIS.
City of Monroe	1	<p>RE: City of Monroe Draft SEIS Vision 2050 Comment Letter</p> <p>Dear Ms. Harris,</p> <p>On behalf of the City Council and the City of Monroe, thank you for the opportunity to provide comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for Vision 2050.</p> <p>Since the inception of Vision 2040, the Puget Sound Region has changed dramatically with significant localized population growth, regional investment in transportation infrastructure, and expanded employment opportunities. As the Puget Sound Regional Council (PSRC) contemplates updates under Vision 2050, it is critical that the role of cities and towns in the allocation of growth targets is not minimized. Cities and towns offer an option to maintain traditional neighborhoods that meet market preferences, provide local growth centers for focused employment supporting local job to housing balances, and supply reduced barrier I attainable housing options.</p> <p>The City of Monroe, as a community, endorses the development of a hybrid approach that provides for significant growth along transit-focused areas, but also concentrates the majority of growth within municipal urban growth areas (UGAs) where existing services and infrastructure are available. Such a hybrid approach acknowledges the need for planned growth within Snohomish County, but also would account for unanticipated organic growth.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for a hybrid alternative has been acknowledged.

Commenter	Comment Number	Comment Text	Response
City of Monroe	2	<p>Increased growth in unincorporated areas outside of defined UGAs is ultimately at the expense of stagnating growth in cities and towns. Allocating urban levels of growth to outlying rural areas is particularly problematic, as rural areas, in general, are not characterized by urban levels of growth and typically do not have "adequate existing public facility and service capacities to serve such development," as specified in RCW 36.70A.110(3). Rather than intensifying allocations to outlying unincorporated rural areas, growth adjustments should be concentrated along the fringes of developed urban growth boundaries, or between UGA boundaries near one another to allow efficient land development and delivery of urban services.</p> <p>The City supports a multifaceted approach to the distribution of growth in Snohomish County, inclusive of the following:</p> <ol style="list-style-type: none"> <li>1. Encouraging growth inside city limits in areas close to High Capacity Transit, as these areas typically contain existing public facilities and service capacities to accommodate urban-level growth.</li> <li>2. Encouraging annexation of existing urban growth areas around cities by removing barriers to annexation in local and state laws, and by limiting urban-level development in urban growth areas until annexations occur, except in those areas near High Capacity Transit.</li> <li>3. Considering the expansion of UGAs around cities when the UGA expansion is processed concurrent to an annexation.</li> <li>4. Supporting investments in transportation networks that connect cities and employment centers outside the 1-5 corridor. Monroe is situated at the nexus of U.S. Highway 2, State Route 522, and State Route 203, and growth has occurred organically as a result of its situation on this transportation network.</li> <li>5. Encouraging employment centers in cities such as Monroe that are noncontiguous to other cities. In these areas, affordable land is available for employers with the added benefit of proximity to services and transportation.</li> </ol> <p>For Vision 2050 to be successful, it is imperative that communities working cooperatively under countywide planning policies retain the ability to redistribute local growth targets as appropriate. As a primary pillar of the Growth Management Act, local jurisdictions need to be able to develop comprehensive plans and land use policies that reflect the values of the community while meeting the modeling targets of the regional growth strategy; however, flexibility in application of the model should be a key principle in developing a hybrid model.</p> <p>Thank you again for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for Vision 2050.</p> <p>Sincerely,</p>	<p>Comments acknowledged. The policy direction in VISION 2050 is to maintain a stable UGA and to focus growth within the UGA. VISION 2050's Development Patterns section includes policies and actions to support annexation.</p>
City of North Bend	1	<p>The City of North Bend appreciates the opportunity to comment on the draft VISION 2050 growth options to date. The City last commented on the scoping of the proposed Vision 2050 update on March 19, 2018.</p> <p>Generally, the City does not have a favored scenario but sees a combination of the growth options to date being more realistic. At the Growth Management Policy Board meeting on May 30, 2019 comments were made by the board to ensure the selected option is realistic and grounded and that we don't exceed the targets on Day 1. There simply does not seem to be a one size fits all approach for such a diverse and growing region.</p> <p>The No Action Alternative seems to be default approach and might be the more than likely outcome.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS.</p>
City of North Bend	2	<p>The City of North Bend supports many of the opportunities and measures in the Transit Focused Growth Scenario but 75% of the region's growth within 1/4 to 1/2 mile from current and high capacity transit station areas seems high. The average drive time per day with transit focused is only 2 minutes less than the other alternatives.</p>	<p>Based on feedback on the Draft SEIS alternatives, for the Preferred Growth Alternative, the regionwide goal for population growth in regional growth centers and areas within walking distance of high-capacity transit was set at 65%.</p>
City of North Bend	3	<p>No matter how we try to socially engineer where growth will occur, we can't control where people will always want to move to and where they want to live. The hardest missing piece in all of this seems to be how to plan for the individual choices of the 1.8 Million additional people who will be moving into the region. It doesn't seem reasonable to ignore the no action or the reset urban growth based on past trends.</p>	<p>Comment acknowledged.</p>
City of North Bend	4	<p>As we stated in our previous letter consideration should be given to how the impacts of growth targets that act as precise growth assignments differ from the impacts if the targets are viewed as aspirational goals. This should definitely be discussed in the EIS.</p>	<p>For the purpose of environmental review, the alternatives need to be applied as though they achieve the assigned growth allocations, which are a necessary input to the model. VISION 2050 does not require precisely meeting targets and includes text describing the need to work towards the Regional Growth Strategy. The range of results from the Draft EIS and the Draft SEIS indicate directionality that can help understand the potential results of growth allocations that aren't fully achieved.</p>
City of North Bend	5	<p>No matter which alternative is chosen the City would strongly encourage the following approaches to ensure that the City of North Bend's growth targets result in our GMA mandate to deliver urban services, and urban development densities.</p> <ul style="list-style-type: none"> <li>• Involve city staff in transparent target-setting, so staff can ensure PSRC targets are adequately informed;</li> <li>• Support a continued definition of growth targets as a minimum population target to be met for all urban growth areas, the foundational GMA requirement that applies uniformly to all the UGAO be it a small or large City;</li> <li>• Base consistency determinations on policies- such as TOO incentives in large cities targeted for higher levels of growth- rather than on one set of numeric criteria.</li> </ul> <p>Thank you for considering our comments and we look forward to working with you so that targets for the City are set as a minimum and do not result in conditional certification again.</p> <p>Ken Hearing, Mayor</p>	<p>Suggestions noted. PSRC staff engages with city staff primarily through the Regional Staff Committee and countywide groups such as the King County Planning Directors; however, they can also meet with city staff as requested. Targets are set through countywide forums, not at PSRC, although PSRC encourages participation by all jurisdictions in the process.</p>

Commenter	Comment Number	Comment Text	Response
City of Port Orchard	1	The Port Orchard City Council has reviewed the VISION 2050 Draft SEIS (February 2019) and its three proposed alternatives for an updated Regional Growth Strategy. The following comments are provided on behalf of the Port Orchard City Council.  Of the three Regional Growth Strategy alternatives (Stay the Course, Transit Focused Growth, Reset Urban Growth), the City prefers the Transit Focused Growth strategy. This alternative would continue VISION 2040's approach of promoting compact urban growth near the region's existing and planned high-capacity transit stations, to make the most effective use of regional investments in transportation infrastructure. The City believes that this alternative is the most supportive of the Growth Management Act's (GMA) goals of reducing sprawl, encouraging efficient multi-modal transportation systems based on regional priorities, and protecting the environment. It is also the most consistent with the Act's requirement that urban growth should be directed to urban growth areas (UGAs), and that growth outside UGAs should not be urban in nature.	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for the Transit Focused Growth alternative has been acknowledged.
City of Port Orchard	2	According to the information provided in the SEIS, both the Stay the Course and Reset Urban Growth alternatives would direct a higher percentage of population growth into small cities and towns, unincorporated areas and rural areas than provided in VISION 2040. The Reset Urban Growth alternative, in particular, would significantly reduce the amount of moderate density housing and employment growth directed to urban areas and areas served by high-capacity transit, and would significantly increase the amount of new land being developed and the need for new and expanded local and regional infrastructure. This alternative appears largely inconsistent with the GMA and VISION 2040, and the City strongly urges that the PSRC not adopt it as the preferred alternative for VISION 2050.	Comment acknowledged.
City of Port Orchard	3	If the PSRC does not move forward with the Transit Focused Growth alternative, the City requests consideration of a "hybrid" alternative that would combine aspects of both the Transit Focused Growth and Stay the Course alternatives, to continue directing growth to existing regional growth centers while giving preference to growth to regional centers with high-capacity transit to leverage the region's investments (ST3 and Kitsap Fast Ferries).	The Growth Management Policy Board developed the preferred growth strategy based on the Transit Focused Growth alternative, with some modifications.
City of Port Orchard	4	Additionally, the City requests that the PSRC consider policy language in VISION 2050 which would compel local governments that are growing in a manner inconsistent with their VISION 2040 targets to take corrective action and bring their growth back into established parameters. In particular, these policies should apply to cities and towns, and urban unincorporated areas within counties, whose growth under VISION 2040 has significantly exceeded their official population allocations. If unchecked, this trend will continue to move growth away from metropolitan and core cities and areas with high-capacity transit, and will be counterproductive to VISION 2050's regional strategy and multi-county planning policies.  Thank you for considering the City of Port Orchard's comments on the VISION 2050 Draft SEIS. We look forward to continuing work with the PSRC on the development and implementation of VISION 2050. If the City can be of further assistance at this time, please contact me.	A new action in the Regional Growth Strategy chapter on tracking and evaluating growth supports your suggestion, as well as policies that call for growth consistent with the Regional Growth Strategy.
City of Redmond	1	Dear Mr. Brown,  The City of Redmond's Mayor Marchione co-signed King County's comment letter on the Vision 2050 Draft Supplemental Environmental Impact Statement (DSEIS). In addition, Redmond staff have reviewed and would like to offer the enclosed technical comments on the DSEIS and potential mitigation measures.  Redmond's success in planning for growth is contingent upon a strong, supportive regional and county framework that charts an achievable course while also allowing cities the flexibility to respond to local conditions. The attached comments on the DSEIS address information gaps, assumptions, and clarifications in support of the goal to adequately mitigate potential impacts.  Please feel free to contact Judy Fani at jfani@redmond.gov if you have any questions.  Respectfully,  Erika Vandenbrande, Director Planning and Community Development City of Redmond Carol Helland, Deputy Director Judy Fani, Acting Long Range Planning Manager  Enclosure: Vision 2050 DSEIS - City of Redmond Comments  [Table in letter-- reformatted for ease of coding]  Employment - Preserve adequate land at reasonable cost for land-intensive commercial industries"-include wording about light industrial and agricultural as well. One of the issues concerning redevelopment in Redmond is having enough commercial, light industrial, and agricultural land to support a healthy mix of employment sectors. This will also increase job-housing balance for non-tech jobs and tie in with wording in other sections encouraging protection of these lands.	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The mitigation measure has been updated as suggested.
City of Redmond	2	Housing - Increased opportunities for moderate density housing should also be added to this alternative. Efforts to create "missing middle" housing will provide variety and choice in housing type; in fact, "Expand housing diversity, particularly moderate-density housing" is listed as a potential mitigation measure in Table 4.1-4. Units that have features such as ground orientation or with three or more bedrooms may allow families with particular needs such as immigrant or multigenerational families, for example, greater options as this region is experiencing growth in these populations.	VISION 2050 has been updated to include additional housing provisions. A new policy to promote moderate density housing was added to the Housing section.
City of Redmond	3	Land Use - "Urban Land" and "Rural Land" (p. 107-8): For all growth alternatives, the DSEIS does not address issues around siting new schools to support growth as urban areas increase in density. Existing rural character could be potentially impacted if new schools that serve urban populations are sited in rural lands.	The need to for siting new schools is discussed in Public Services and Utilities section. Additional information about the challenges of siting schools has been added to the SEIS.

Commenter	Comment Number	Comment Text	Response
City of Redmond	4	<p>Transportation - * Consider addressing the increased role that walking and bicycling will play in the function of the transportation system by providing the main form of access to high capacity transit.</p> <p>The City recommends the DSEIS identify telework trends and discuss potential impacts (reference the PSRC " Driving Alone to Work Continues to Decline" ). Additionally, PSRC's household travel surveys have noted an increasing trend in the number of employees who are working from home and thus using none of the travel modes noted in the DSEIS, which could suggest some of the congestion trends may be overestimated.</p> <p>Consider including a discussion on future trends and impacts to the local and regional transportation network from e-commerce deliveries. The Regional Transportation Plan referenced in the DSEIS mentions e-commerce, but the discussion does not address impacts and it does not appear the modeling methodology takes into consideration e-commerce trends and resulting growth in deliveries.</p> <p>Consider including a "Model Limitations" section which addresses limitations of the model and associated data inputs for each model beyond the SoundCast model.</p>	<p>The VISION 2050 Transportation section contains policies to promote walking and biking. A Technology Briefing Paper and a Freight Briefing Paper prepared for VISION 2050 discuss the changes in transportation technology and package delivery. Policies and actions in the Transportation section of VISION 2050 call for continued work to address technology and e-commerce. Appendix C, Modeling Methodology and Analysis Tools, contains information on model limitations.</p>
City of Redmond	5	<p>Air Quality and Greenhouse Gas Emissions - Consider addressing potential changes to Federal air quality standards and their possible effect on the region's planning.</p>	<p>PSRC's planning products stay abreast of all current federal and state standards, and adjust accordingly when they are revised. The region is currently meeting all federal and state air quality standards, and continues to monitor for all pollutants.</p>
City of Redmond	6	<p>Water Quality and Hydrology –</p> <p>Section 2.8 (p. 48): In addition to "sole-source aquifer" add "critical aquifer recharge area" to be more inclusive of drinking water sources. The use of critical aquifer recharge area (CARA) is consistent with Section 2.4.1 (p. 26) of the DSEIS recognizing CARAs need to be preserved under the GMA.</p> <p>Section 2.8.1 (p. 48): Decreased aquifer recharge is an additional impact from increased impervious surfaces that should be addressed.</p> <p>Table 2.8-1 (p. 50): Effective impervious surface should be analyzed to account for impervious surfaces that are infiltrated.</p> <p>Section 4.6.1.1 (p. 133): In addition to "sole-source aquifer" add "critical aquifer recharge area" in the "Other water resources" bullet to be more inclusive of drinking water sources. The use of CARA is consistent with Section 2.4.1 (p.26) of the DSEIS recognizing CARAs need to be preserved under the GMA.</p> <p>Section 4.6.1.1 (p. 134): Decreased aquifer recharge is an additional impact from increased impervious surfaces that should be addressed in the "impervious surfaces" bullet.</p> <p>Tables 4.6-2 and 4.7-1 (p. 137 and 141): Caution should be used when pursuing water reuse measures in CARAs that are shallow and unconfined, such as Redmond's. The drinking water resource may be impaired if reclaimed water infiltrates into the aquifer.</p>	<p>Many of these suggestions were incorporated into the Water Quality and Hydrology sections as suggested.</p>
City of Redmond	7	<p>Public Services and Utilities –</p> <p>Section 2.8.3: This section should note that cities and counties are required in their NPDES permit to adopt stormwater management regulations that meet or exceed the surface water protections established by Washington Department of Ecology's Stormwater Management Manual for Western Washington. As written, this section seems to state that all jurisdictions use the Ecology manual, however that is not the case and other stormwater management manuals have been adopted by jurisdictions. Also, small cities that don't have an NPDES permit are not required to meet or exceed the regulations established by Ecology's manual.</p> <p>Section 2.9.1: The stormwater bullet seems to indicate that jurisdictions are required to manage stormwater in accordance with the Ecology Manual. This item should be revised to be consistent with the above comment on Section 2.8.3.</p> <p>Consider adding a discussion about the cost of utility services and ongoing asset replacement and maintenance costs under each of the three alternatives. These costs are generally less when growth is directed to compact areas.</p>	<p>The Public Services and Utilities sections have been updated as suggested.</p>
City of Redmond	8	<p>Parks and Recreation</p> <p>Table 4.8-1, "Potential Mitigation Measures for Parks and Recreation Resources"</p> <p>"Develop level-of-service guidelines for parks and recreation facilities." The Washington Recreation and Conservation Office has guidelines and they are flexible, based on how a city believes it is best to plan (<a href="https://rco.wa.gov/documents/rec_trends/LevelofServiceReport2010.pdf">https://rco.wa.gov/documents/rec_trends/LevelofServiceReport2010.pdf</a>). Using the acres/ population model described in this DEIS is outdated and not sustainable as development occurs and there is less land available, land is more expensive, and people's use of the land changes for recreation. Some recommendations are always welcome but allowing flexibility in local jurisdictions in developing their own levels of service is important.</p> <p>The term "recreation resources" is not defined. Consider including indoor facilities such as community centers, arts centers and pools as part of that definition.</p> <p>Several potential mitigation measures note the need for funding. Please identify what such options might be.</p> <p>"Incentivize private developers to provide recreation and open space with development projects." Consider clarifying and expanding to include "Public parks, trails, and indoor recreation facility space."</p> <p>Reduced tree canopy is not addressed. There may also be a need to protect certain trees (individually, small wooded areas or forests) for different reasons, such as mitigation for a visual impact (some kind of development/infrastructure), to protect steep slopes, to maintain wildlife corridors, due to the age and significance of a stand of trees, etc. Some cities are adopting tree canopy goals, but a regional approach is necessary to coordinate planning, funding, and even to share resources and best practices.</p> <p>The DSEIS does not appear to address changing demographics (culturally/ethnically) and the need to consider how these changes may impact park uses.</p>	<p>Updates have been made to Table 4.8-1 of the Parks and Recreation section of the SEIS.</p>

Commenter	Comment Number	Comment Text	Response
City of Redmond	9	Energy Energy use appears to be predicted as a steady state, as opposed to varying by intensity of development patterns. Consider whether this assumption accurately reflects anticipated future growth trends.	Additional context has been added to this section to reflect forecasted energy use and underlying assumptions, including development patterns. The referenced forecast in this section does not account specifically for variations in intensity of development patterns.
City of Redmond	10	Historic, Cultural, and Archaeological Resources Table 2.13 (p. 66): The header for this section does not account for the change to the number of historic resources as per the Washington Department of Archaeology's definition of "historic." Defined as the built environment constructed 50 or more years in the past and in the context of the region's past development patterns, many additional, existing structures meet the age criteria. This definition should be reflected in section 2.13. Table 2.13 (p. 66): Though the narrative references the Washington Historic Register and Local Registers, this information as well as the statewide collection of cultural resources data (WISAARD) is not reflected in later figures. Figure 2.13-1 provides only the National Register and should depict the state, regional (such as King County), and local registers. It should also be noted, registers represent resources that have undergone voluntary review and nomination. The State's definition of historic, noted above, results in a significant increase in the amount of resources that would be considered for their significance in advance of their demolition, remodel, or reconstruction. Consultation with the Washington Department of Archaeology and Historic Preservation and affected Indian tribes is suggested. Table 4.11 (p. 152): Early consideration and education regarding cultural resources can provide a proactive approach and sometimes, less costly and efficient alternative use of local planning and zoning techniques. For example, an applicant submitting a permit has likely completed geotechnical exploration and thereby, inadvertently damaged archaeological resources. An additional Mitigation Measure involving education, awareness programs, and proactive tools for the development community should be considered.	Edits have been made to Section 2.13 and 4.11 to address these comments.
City of Redmond	11	Visual quality Table 2.14 (p. 68): The phrasing in the header for this section concludes that conditions and trends have remained the same, however, this may be inaccurate. Increases in population and corresponding development housing, employment, commercial, and services should be further examined. For example, the increases may further impact dark night skies and may not be able to maintain the views of visual resources as described in the narrative. Additional consideration including consultation with the University of Washington: College of the Environment is suggested for this section. Table 4.12 (p. 153): Within the Potential Mitigation Measures, please consider the following changes: • Add measure to continue/develop standards for designing sites and structures to strengthen Dark Night Sky objectives; • Emphasize or require the preservation and planting of vegetation to provide green infrastructure in support of environmental health, visual quality, and social equity.	Additional mitigation has been added to the SEIS in response to these comments.
City of Redmond	12	Earth Consider addressing how the region's changing demographics presents challenges for community education outreach in disaster preparedness.	Mitigation measures have been added to address this topic.
City of Redmond	13	Noise Consider clarifying or expanding support for the following conclusion: "At a regional level, there are no notable differences in noise impacts between alternatives."	Additional clarification has been made to the SEIS in response to this comment.
City of Redmond	14	Environmental Justice Community Outreach efforts should include a strategy focused on engaging at existing community events not just hosting separate events. Care should be taken to discuss the concepts in straightforward, understandable terms rather than relying on jargon. Multiple languages and multiple ways of commenting should be encouraged. It may be important not to rely solely on the Community Partners group- especially if they are present only as stakeholders and not constituency representatives. Consider more specific language related to preventing displacement especially since it was identified as a negative aspect of the Transit Focused Growth option; in the impacts/ benefits chart on p. 175 under Growth in Opportunity Areas, the TFG column should identify specific mitigation strategies and discuss the potential that these be required; Again under element 5.8 on p. 177, the final section states " Implementation of the mitigation measures listed in sections 5.7 and 4.1 would help to reduce or avoid these impacts." It would be helpful to add language to support this conclusion.	PSRC conducted a wide variety of outreach and engagement strategies at existing community events during the comment period and provided printed materials in nine languages. Particular attention was paid to engagement methods targeting under-represented and hard-to-reach communities. PSRC will continue to seek ways to improve outreach and opportunities for the public to become engaged in regional planning efforts.  VISION 2050 RC-Action-3 on developing a regional equity strategy calls for PSRC to develop a plan and commit funding sources for an equity advisory group. The regional equity strategy will be an opportunity to explore options for Executive Board consideration and to identify resources to support local actions.  Additional mitigation measures have been added in response to this comment.
City of Redmond	15	Multicounty Planning Policies Knowing that the Multicounty Planning Policies will be revised to be consistent with the preferred Regional Growth Strategy alternative and included with the draft plan when released in summer 2019, the City will review the policies at that time.	Comment noted.

Committer	Comment Number	Comment Text	Response
City of Sammamish	1	<p>The purpose of this letter is to provide feedback to the Puget Sound Regional Council (PSRC) on the VISION 2050 Draft Supplemental Environmental Impact Statement (DSEIS). The Sammamish City Council has reviewed the three regional growth alternatives proposed in the DSEIS and discussed their potential impacts on Sammamish. In summary, the City Council unanimously supports the Transit Focused Growth alternative.</p> <p>The Transit Focused Growth alternative is the best option for Sammamish as it most closely aligns with the vision and values of our community. The City and its residents care deeply about environmental stewardship, and this alternative results in the least amount of land development, greatest habitat protection, and best air quality of the three options.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for the Transit Focused Growth alternative has been acknowledged.
City of Sammamish	2	<p>However, we are concerned to see that fewer outdated stormwater controls will be updated with this alternative, and we would like to see plans for how those controls will be updated in the future.</p>	VISION 2050 has a new Environment policy and action that addresses stormwater impacts. This stormwater planning work will be ongoing.
City of Sammamish	3	<p>Considering the challenges of housing affordability and equity in Sammamish and in the region, we also appreciate that this alternative would result in a net benefit for lower income individuals and communities of color. Although we would like to see options for how the increased risk of displacement can be counteracted.</p>	VISION 2050 has been updated to include additional consideration of displacement. See the policies and actions in the Regional Collaboration, Development Patterns, Housing, and Economy sections.
City of Sammamish	4	<p>According to the 2018 INRIX Global Traffic Scorecard, Seattle was the sixth worst city in the country for traffic, with drivers spending an average of 138 hours per year stuck in traffic at a cost of \$1,932 per motorist. The additional 1.8 million people projected to move to this region by 2050 will only exacerbate these issues, so now is the time to direct new growth towards areas with high capacity transit.</p> <p>The City's neighbors to the north and south are both scheduled to receive light rail stops; our challenge will be in developing strategies for how we move our residents to and from those stops. Therefore, even though we support the Transit Focused Growth alternative, we would hope and expect to not have any less support for transit service in Sammamish in the future. It is critical that those cities without high capacity transit receive additional bus stops and routes to connect into the regional high capacity transit system.</p> <p>We appreciate the opportunity to provide input and look forward to participating in the VISION 2050 process. Please reach out if we can provide any further information.</p>	Comment acknowledged.
City of Seattle	1	<p>Dear Mr. Brown:</p> <p>Thank you for the opportunity to provide comments on the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050. With the four-county central Puget Sound region expecting an additional 1.8 million people and 1.2 million jobs by 2050, it is extremely important that the region continue to collaborate around ambitious policies and actions to manage growth for a more environmentally sustainable, equitable, and prosperous region with a high quality of life for all residents.</p> <p>Since VISION 2040 was adopted in 2008, the region's rapid growth has contributed to challenges related to housing affordability, equitable development and displacement, regional mobility, and environmental threats. Steps have been taken to respond to these challenges through local comprehensive plans, major investments toward a regional transit system, regional and local steps to address climate change, and expanding efforts to create and preserve affordable housing. However, much work remains.</p> <p>The DSEIS analyzes the impacts of three alternative future growth patterns – Stay the Course (no change from VISION 2040), Transit Focused Growth (major emphasis on transit-oriented development), and Reset Urban Growth (a more dispersed growth pattern). The DSEIS clearly shows that the Transit Focused Growth performs better than the other alternatives across a range of environmental measures. These include a sustainable land use pattern, multimodal mobility benefits, housing affordability, race and equity, and impacts on the natural environment.</p> <p>Based on these results and consistent with the direction in the Seattle 2035 comprehensive plan, we urge the Growth Management Policy Board (GMPB) to retain a robust transit-focus in the regional growth strategy that recognizes sustained growth in King County and its major cities. Just as important, the GMPB should recommend strong Multicounty Planning Policies and regional and local actions to mitigate the impacts of growth. We look forward to working with our colleagues from around the region to craft a preferred alternative and draft plan by July of this year.</p> <p>The remainder of our comments focus on four key areas to address in VISION 2050.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for the Transit Focused Growth alternative has been acknowledged.
City of Seattle	2	<p><b>Compact Transit-Served Urban Growth</b></p> <p>The state Growth Management Act calls for local governments to work together to focus housing and jobs through compact urban development within Urban Growth Areas. King County and its cities have had substantial success in steering growth away from our rural and resource lands outside of the Urban Growth Area (UGA) boundary. VISION 2050 should build on this trend across the region by minimizing the amount of growth outside of or near to the UGA boundary. With only 2% of residential growth outside the UGA and 6% within a ¼ mile of the boundary, Transit Focused Growth performs better than other alternatives.</p> <p>Inside the UGA, housing and employment should be focused within recognized centers and other areas with access to high capacity transit (HCT). Among the alternatives, Transit Focused Growth places more housing and jobs in cities, like Seattle, that contain one or more Regional Growth Centers, and, overall, sets an ambitious goal of achieving 75% of the region's growth within walking distance of transit.</p> <p>As shown in the DSEIS results, Transit Focused Growth increases the proximity of jobs and housing to each other and to the future regional transit network and results in residents spending less time travelling to work and other destinations and less time stuck in traffic. This alternative also significantly increases transit ridership, which is essential for the region to continue to grow and prosper. A predominantly transit-oriented development pattern achieved across the region will result in more efficient use of our transportation system, especially in and out of Seattle and other major employment centers. With the region investing billions of dollars to connect centers through light rail extensions, we must leverage this investment with complementary transit investments and focused growth to best achieve the values and desired outcomes of VISION 2050.</p> <p>VISION 2050 should strongly support and encourage local efforts in all jurisdictions served by regional transit to focus growth around those investments, including:</p> <ul style="list-style-type: none"> <li>• Promote station area planning around light rail and other key HCT access points</li> </ul>	VISION 2050 has been updated to include additional policies and action to promote these important strategies. For example, the Development Patterns section has a new action for PSRC to work in collaboration with transit agencies and local government to develop guidance for transit-supportive densities in different types of high-capacity transit station areas. See the Regional Collaboration, Regional Growth Strategy, Development Patterns, and Transportation sections.

Commenter	Comment Number	Comment Text	Response
		<ul style="list-style-type: none"> <li>• Establish ambitious standards for transit-supportive densities across a range of communities</li> <li>• Promote local policies and tools to incentivize dense mixed-use development within transit station walksheds</li> <li>• Encourage an increased supply and variety of nearby housing options with accessible "last mile" connections to regional transit</li> <li>• Set high expectations for equitable transit-oriented development (TOD) in all station areas, especially where displacement risk is high</li> <li>• Promote tools to steer growth away from outlying areas, including unincorporated areas within the UGA that lack transit</li> </ul> <p>As the GMPB works toward a preferred alternative that is both ambitious and realistic, additional analysis may be needed. This may include data on current and potential future capacity in the region and future scenarios for station area buildout timed with the phased implementation of ST3 and other transit investments.</p>	
City of Seattle	3	<p>Race and Social Equity</p> <p>The City of Seattle plans for race and social justice through inclusive community engagement and equitable development, and, along with PSRC and other jurisdictions throughout the region, committed to these principles by signing onto the Growing Transit Communities Strategy in 2014. PSRC's efforts to incorporate race and equity into the VISION 2050 planning process, including new and improved data approaches included in the DSEIS, are commendable.</p> <p>Updated opportunity mapping and data on regional demographics reveal significant disparities within the region among people of different races and incomes in access to housing, jobs, mobility options, quality education, and healthy communities. The implications of this analysis are twofold. First, VISION 2050 should expand access to high opportunity areas by focusing housing, especially affordable housing, in those communities. Second,** VISION 2050 should address existing disparities in communities that have suffered from historical disinvestment.**</p> <p>Analysis of demographic trends in the DSEIS shows the region to be increasingly diverse overall, with diversity spread across more communities. Geographic trends also suggest displacement of people of color from Seattle to suburban areas has occurred. New analyses of displacement risk indicate more communities that are vulnerable to being forced from their homes through redevelopment and economic pressures in the future.</p> <p>We concur with the general conclusion of the DSEIS that all three growth alternatives would heighten displacement potential in these communities. While the Transit Focused Growth alternative places the most residential growth (23%) in at risk communities, there are multiple other equity and anti-displacement benefits of Transit Focused Growth that should also be considered, including the potential to provide an adequate supply of housing choices, including affordable housing, where demand is highest – near transit, jobs, education, and services. TOD has the greatest potential to reduce the combined household costs of housing and transportation.</p> <p>With race and equity as a policy emphasis threaded throughout VISION 2050, each chapter must include strong and explicit policies that:</p> <ul style="list-style-type: none"> <li>• Are based on a clear and consistent definition of equity that explicitly recognizes race and racial disparities within the region</li> <li>• Set clear expectations for local action to adopt tools and strategies for equitable development, inclusive community engagement, and community driven planning</li> <li>• Further adoption of effective displacement mitigation strategies that are scaled to address the local and regional need, including strategies in Table 19 in Appendix H</li> <li>• Support ongoing regional collaboration to address race and equity</li> </ul>	VISION 2050 has been updated to include additional consideration of strategies to address equity throughout the region. See the following sections for equity-related policies: Regional Collaboration, Development Patterns, Housing, Economy, Transportation, and Public Services. Benefits of TOD are discussed in Section 2.4.3 of the Final SEIS.
City of Seattle	4	<p>Housing and Housing Affordability</p> <p>The region faces an ongoing housing affordability crisis, including skyrocketing home prices and rents, displacement of low-income households, homelessness, and long commutes, often by car, due to a mismatch of jobs and housing. VISION 2050 should be a platform for regionalizing an urgent response to this crisis. Housing is regional, and all cities and counties have a responsibility to act.</p> <p>The planned pattern of growth in the region will shape housing outcomes. The DSEIS finds that Transit Focused Growth creates more housing in areas of highest demand near transit and employment centers. It also performs best in promoting high and moderate density housing types that provide more housing variety and affordability than do areas planned exclusively for low-density detached housing. Identified as a key measure in the DSEIS, moderate density housing can provide rental and ownership options for low to middle income households as well as larger units for families. While Transit Focused Growth achieves the highest share of moderate density housing (19%) based on current zoning, the actual potential is even higher, as communities consider future zoning changes both within and nearby transit station areas.</p> <p>To address a much broader range of housing issues, PSRC should prioritize two key actions: the regional housing needs assessment and regional housing strategy, which should include:</p> <ul style="list-style-type: none"> <li>• A regional framework for estimating regional and local housing needs, monitoring of outcomes, and local accountability</li> <li>• Multi-jurisdiction approaches to increasing funding available for affordable housing</li> <li>• Replicable models to leverage new development with incentives and requirements to include affordable units (Mandatory Housing Affordability adopted by City of Seattle is one such model and there are others)</li> <li>• Emphasis on households most in need, typically below 50% of Area Median Income</li> </ul>	VISION 2050 has been updated to include additional consideration of and strategies to address housing affordability. Many of the strategies are consistent with these suggestions. See the Housing section.
City of Seattle	5	<p>Climate Change Mitigation and Adaptation</p> <p>Among the regional growth strategy alternatives, Transit Focused Growth scenario provides the most benefits related to climate change and other aspects of the environment. At the same time, considerably more needs to be done to build on the modest reductions in emissions likely to result from this growth pattern. Beyond the potential mitigation measures identified in the DSEIS for transportation and climate change, PSRC should also consider:</p> <ul style="list-style-type: none"> <li>• Formally adopting regional greenhouse gas reduction goals, in line with those already established by multiple municipalities, King County, and the Puget Sound Clean Air Agency, along with global efforts to keep global temperature increase below 1.5 degrees Celsius in this century in order to avert massive disruptions due to climate change.</li> </ul>	VISION 2050 has been updated to include additional consideration of and strategies to address climate change. Many of the strategies are consistent with these suggestions. See the new stand-alone climate change section.

Commenter	Comment Number	Comment Text	Response
		<ul style="list-style-type: none"> <li>• Decarbonizing transportation beyond the urban core, such as policies that drive electrification of the transportation sector beyond urban areas, including support for public EV charging infrastructure in rural/suburban/urban areas, bus and freight electrification, and highway policies that incentivize electric vehicle use.</li> <li>• Policies to drive on-site renewable energy, community solar efforts, and renewable energy targets for municipalities and counties.</li> <li>• Addressing issues of embedded carbon sources of emissions with policies that support a growing market for lower carbon asphalt, cement, and other building materials.</li> <li>• Increased focus on resilience planning to mitigate climate impacts, particularly for low-income communities of color who may be at greater risk from flooding, higher summer temperatures, and hazardous air quality events.</li> </ul> <p>As the City of Seattle drives towards our own goals and targets, including execution of the Mayor’s Climate action strategy and our commitment to being carbon neutral by 2050, we want to underscore our shared responsibility with the rest of the Puget Sound region. VISION 2050 is an opportunity to redouble efforts and put forward the boldest strategies to combat climate change, prepare for inevitable climate impacts, and prosper in a carbon-constrained/free future.</p> <p>We appreciate the opportunity to comment on the DSEIS and look forward to collaborating with PSRC and our partners in the region to advance equitable and sustainable growth. Please don’t hesitate to contact Michael Hubner, Long Range Planning Manager, at 206-684-8380.</p> <p>Sincerely, Samuel Assefa</p>	
City of Shoreline	1	<p>The City of Shoreline (“Shoreline”) would like to take this opportunity to convey to PSRC our initial comments in response to Puget Sound Regional Council’s VISION 2050 Draft Supplemental Environmental Impact Statement. We appreciate the amount of work that has gone into preparing the DSEIS, and the opportunity for the public to provide input on how and where the central Puget Sound region should grow.</p> <p>Over the next 30 years, the region is forecasted to grow by 1.8 million additional people and 1.2 million for new jobs.</p> <p>PSRC has identified three growth alternatives in the DSEIS and Shoreline’s preferred growth strategy is the Transit Focused Growth alternative. The Transit Focused Growth alternative considers a compact growth pattern based on the VISION 2040 Regional Growth Strategy that assumes accelerated growth near the region’s existing and planned transit investments.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city’s preference for the Transit Focused Growth alternative has been acknowledged.
City of Shoreline	2	<p>Shoreline has already begun planning for the region’s future growth by adopting zoning, development regulations, and subarea plans that support increased housing and jobs along high-capacity transit corridors, including light rail and bus rapid transit.</p> <p>The Aurora Corridor through Shoreline is home to King County Metro’s E-Line. The area adjacent to Aurora is designated Mixed-Use and zoned Mixed-Business and Town Center. The Mixed-Business and Town Center 1, 2, and 3 zones are the City’s most intense zoning that allows a mix of dense housing and employment centers that can support a wide range of jobs.</p> <p>Shoreline has also adopted and is starting to implement the two light-rail station subarea plans at Sound Transit’s Shoreline North/185th and Shoreline South/145th light rail stations. The City Council took the bold steps to designate roughly 472 acres around both stations for a mix of townhomes, rowhomes, apartments, office, retail, and community uses that will support Sound Transit’s ridership goals and the City’s commitment to a sustainable future locally and regionally.</p> <p>The Transit Focused Growth alternative that states that the region’s population and employment growth should occur within a quarter to a half-mile from current and planned high-capacity transit station areas, including light rail, bus rapid transit, commuter rail, ferries, and streetcar is consistent with Shoreline’s Comprehensive Plan Goals and Policies. Specifically, Land Use Goals and Policies LUII through LU17 encourage the development of walkable places with architectural interest that integrate a wide variety of dense walkable communities, retail, office, and service uses.</p> <p>Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement for VISION 2050.</p>	Shoreline’s planning work has been noted.
City of Snoqualmie	1	<p>The City of Snoqualmie commends the consideration applied to the draft VISION 2050 growth options to date.</p> <p>Generally, the City supports the opportunities and measures in the Transit Focused Growth scenario. The DEIS demonstrates that Transit Focused Growth will yield many positive outcomes such as an 84% increase in transit trips; an 83% share of high density King County growth; and a 16% reduction in Greenhouse Gas Emissions.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city’s preference for the Transit Focused Growth alternative has been acknowledged.
City of Snoqualmie	2	<p>However, the City of Snoqualmie maintains concerns that selection of the Vision 2050 Transit Focused Growth option will encourage PSRC’s use of growth targets as a blunt instrument in small city relationships. To date, growth targets provided to the City of Snoqualmie have not adequately incorporated signed development agreements and local growth trends- the last PSRC certification of the City Comprehensive Plan was particularly embattled at the staff level. City staff were frequently left with the impression that small cities, despite their clear legal standing within the Urban Growth Area, were considered functionally equivalent to rural areas in PSRC assessments despite our GMA mandate to deliver urban services, and urban development densities.</p>	The city’s concerns about the plan certification process have been acknowledged.
City of Snoqualmie	3	<p>Were PSRC to proceed with selection of the Transit Focused Growth scenario, the City would strongly encourage three approaches to reduce regional friction:</p> <ul style="list-style-type: none"> <li>• Involve city staff in transparent target-setting, so staff can ensure PSRC targets are adequately informed;</li> <li>• Support a continued definition of growth targets as a minimum population target to be met for all urban growth areas, the foundational GMA requirement that applies uniformly to all the UGA- be it a small City or large City.</li> <li>• Base consistency determinations on policies- such as TOD incentives in large cities targeted for higher levels of growth - rather than on one set of numeric criteria.</li> </ul> <p>The Draft Environmental Impact Statement indicates the Transit Focused Growth alternative is a strong path forward, which the City conceptually supports- but it should not be used as an excuse at a later date to back small cities into a corner.</p>	Target setting occurs through the countywide processes, which provide the opportunity for local participation. PSRC reviews local plans for consistency.

Commenter	Comment Number	Comment Text	Response
City of Steilacoom	1	<p>Re: SEIS Comments Dear Mr. Brown:</p> <p>Thank you for the opportunity to comment on the draft Supplemental Environmental Impact Statement for Vision 2050.</p> <p>PSRC has crafted three alternatives for evaluation, all of which seem to be academic exercises with little grounding in reality. Additionally, using VISION 2040 as the baseline further compounds the exercise given it does not reflect what is and has actually occurred since its adoption. Multi-county Planning Policies (MPPs) will have to be written later to implement whichever alternative is selected. The reliance on undisclosed policies to achieve the goals of the alternatives makes it nearly impossible to evaluate the impact any of the alternatives would have on the environment or the Town's operations in the coming years.</p> <p>In March of 2018, PSRC solicited the Town's input on VISION 2050. In the comment letter to you dated March 14, 2018, the Town requested that up-to-date real-world data be used to guide the update. Specifically, the Town was interested in existing population and employment locations and trends; permitted infrastructure projects and planned-for development; a review of the targets set for employment and population and the actual experienced employment and population growth by geography; a forecast of impacts continued growth will have on travel corridors, including whether increased traffic congestion will slow or discourage economic development within the region; and for the entire process to be based on reality rather than hoped-for planning.</p> <p>Sadly, this request fell on deaf ears. With this document, it appears that PSRC will continue to ignore the facts on the ground in favor of pursuing its idealized vision of the future.</p> <p>PSRC's approach is predicated on local jurisdictions directing development, a power they do not possess. Local jurisdictions have a duty under the Growth Management Act to plan for growth within their boundaries. That is a far cry from directing owners of property to develop their property. For instance, the Town has an industrial site that has sat idle since the paper mill closed in 2000. If it were up to the Town's government, that site would be providing living-wage jobs and improving the work/life balance for the Town's residents. But the Town cannot force the owner to develop the property, despite being "allocated" an increase in employment.</p> <p>The DSEIS's preference for growth in incorporated areas is not based on the Growth Management Act. Any land within an Urban Growth Area is available for urban-style growth. Pierce County's UGA is large and encompasses a significant area outside incorporated cities and towns, but it is still to be developed at urban densities. All of these alternatives treat urban lands outside of incorporated areas as second class, to be restricted by as-yet-written policies. There is no basis in the Growth Management Act for this distinction. Such policies potentially stifle economic expansion and continue the concentration of economic viability to a few areas leaving the others to provide services without a sustainable tax base.</p> <p>Given the constraints outlined above, the Town submits the following comments on the alternatives.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. Updated data was used to develop and analyze the alternatives. A comment period on the draft VISION 2050 plan provided an opportunity to comment on updated multicounty planning policies.</p>
City of Steilacoom	2	<p>Stay the Course</p> <p>Ostensibly a continuation of the current Regional Growth Strategy, this alternative is touted as the "no-action" alternative. In reality, adopting this alternative will require the adoption of new unspecified policies in order to meet its stated goals of increasing employment in Kitsap, Snohomish and Pierce counties, reducing growth in the unincorporated areas and increasing redevelopment in the urbanized areas.</p> <p>In its 2018 comment letter, the Town requested that PSRC recognize that Vision 2040 is a plan, not an existing reality. The Town requested a "no-action" alternative that follows the existing population and employment trends, not the Vision 2040 planned-for trends. In other words, the opposite of what PSRC produced.</p> <p>This alternative envisions less growth in the urban unincorporated and rural areas and more growth in cities than has historically been the case. It is unclear how this is to happen, except by the adoption of policies which would restrict building on existing urban zoned lots within the urban unincorporated areas. The Town is cognizant of RCW 36.70A.020(6) and is curious to see how the rights of landowners will be protected.</p> <p>In its 2018 comment letter, the Town requested review of the impacts of concentrating economic development in centers on housing affordability and traffic congestion. The DSEIS only looked at which County would produce the most high, medium or low density housing. There seems to be no analysis of what the effect of having high density housing in King County, low density in Kitsap and a mix in Pierce and Snohomish County would bring. Will this housing diversity across the region increase or decrease the supply of affordable housing and what effect will it have on traffic congestion?</p>	<p>VISION 2050 is a plan, therefore the no action alternative (Stay the Course alternative) is the continuation of that plan. The Reset Urban Growth alternative was developed to reflect current growth patterns as opposed to the current plan's Regional Growth Strategy. For any of the alternatives, local actions to implement the plan are needed. The SEIS looked at a variety of transportation measures, including vehicle miles traveled and delay, for each alternative. As noted, it also identified the types of housing (high, medium, or low density) each alternative is likely to produce. The model cannot forecast housing prices, however.</p>
City of Steilacoom	3	<p>Transit Focused Growth</p> <p>This alternative assumes that the 2017 population projections will continue into the future, placing more growth in King County than Pierce, Kitsap and Snohomish. Like the Stay the Course alternative, this alternative relies on unstated policies to achieve its goal of more growth in Metropolitan, Core and HTC cities/areas.</p> <p>The Town's comments on the Stay the Course alternative are equally applicable to this alternative. Without draft MPPs, the Town cannot constructively critique this alternative, but the restrictions on growth under this scenario would have to be more severe than those under the Stay the Course option.</p> <p>What effects this alternative would have on the region's economy, traffic congestion, and affordable housing supply are not discussed. Additionally, large segments of Pierce County are either not served by transit or have so little service as to effectively be unserved. This fact further highlights the academic versus reality-based nature of this option.</p>	<p>Comments noted. See response above.</p>
City of Steilacoom	4	<p>Reset Urban Growth</p> <p>This is the only alternative that uses Buildable Lands data to create its assumptions, for which PSRC should be commended. However, the alternative still assumes that growth in unincorporated urban areas will be lower than historic norms. Despite the fact that property is still available for development in unincorporated areas, no explanation is offered for how growth will be restricted and channeled into incorporated areas.</p> <p>As with the other alternatives, major environmental questions go unexplored. No analysis is provided on the effects of this alternative on the region's economy, traffic congestion, and affordable housing supply.</p>	<p>Comments noted. See response above.</p>

Commenter	Comment Number	Comment Text	Response
City of Steilacoom	5	<p>Other Environmental Impacts</p> <p>In its 2018 comment letter, the Town requested environmental review of two topics which do not appear to have been considered.</p> <p>Impacts of traffic congestion on continued economic growth.</p> <p>Impacts of concentrating economic development in centers on housing affordability and traffic congestion.</p> <p>We would ask that at a minimum these considerations be added. Thank you for this opportunity to comment on the DSEIS for VISION 2050.</p> <p>Sincerely, Paul Loveless Town Administrator</p>	<p>Comments noted. See response above. An analysis of transportation impacts from all of the alternatives has been conducted at the regional scale; impacts at the local level are beyond this scope and will differ across the region. VISION 2050 contains policies and action to address housing affordability, as well as congestion and mobility. The most centers- and transit-focused alternative performs the best on transportation measures such as delay and travel time.</p>
City of Sumner	1	<p>RE: VISION 2050 Draft Supplemental Environmental Impact Statement</p> <p>To Whom It May Concern:</p> <p>Vision 2050 has the potential to be an effective regional growth planning document that would provide meaningful guidance to the counties and cities in the Puget Sound Region. However, this guidance must be balanced against the latitude given to local jurisdictions under the growth management framework in the state of Washington, which is bottom up approach, not a top down approach, to growth management planning. This bottom up approach to growth management planning is reflected in the Puget Sound Regional Council's (PSRC) 1993 Interlocal Agreement Mission Statement which provides that PSRC will adopt and maintain goals and policies "... based on local comprehensive plans of jurisdictions within the region."</p> <p>The focus of the DSEIS is on the Regional Growth Strategy (RGS) -the desired growth pattern within the 4-county region. At the local level, the RGS serves as guidance for the establishment of 20-year population and housing targets. These targets are incorporated into individual jurisdictions' comprehensive plans. These local targets serve as the basis for growth assumptions and identifying needed capital facility improvements to support existing and future growth. With the relationship between the RGS and local planning, this desired growth pattern must balance the larger regional objectives with one which can be reasonably achievable by all jurisdictions.</p> <p>The City can support a preferred alternative that encourages growth to occur adjacent to transit and within centers to take advantage of the large investment the region is making in mass transit over the next two decades. However, the final alternative selected must recognize realistic growth expectations and the public and private investments that have been made based on the existing urban growth area boundaries.</p> <p>The City does support PSRC's effort to combine certain unincorporated urban areas within other geographies in the RGS as a way of incorporating reality into the planning for the region (e.g. considering the Tacoma PAA is within the HTC Communities Geography because of a Bus Rapid Transit (BRT) route). The City believes that as part of the selected alternative it would be just as logical to include other unincorporated PAAs and Potential Incorporation Areas (PIA) under the "Core" or "Cities and Towns" Geographies because these areas are planned to be annexed or to become cities. This would ensure that the planning would support the envisioned future versus using up capacity at lower levels that could hinder annexation or incorporation. The region must maximize capacity within the existing urban growth area to lessen the need for expansion in the future. It would be contrary to the GMA to limit growth within the established UGA, as once the areas are built at a lower density the capacity is gone this may result in the need to expand the UGA in the future.</p> <p>It is questionable if the growth allocations associated with the Stay the Course and Transit Focused Growth alternatives can be realistically achieved throughout the region. To achieve either of these RGS targets some jurisdictions and "Geographies" will need to grow at rates never experienced in the past 10 years, while other jurisdictions will have to take actions to significantly restrict growth. If PSRC is committed to mandating these unrealistic growth rates, how will jurisdictions that are not achieving the higher rates be evaluated during the next comprehensive plan update? Additionally, as noted in the letter from the City of Lakewood, the "Transit Focused Growth" alternative has an explicit goal for seventy-five percent (75%) of the region's population and employment growth to occur within regional growth centers and in close proximity to high-capacity transit, this may be unrealistic. As noted in Lakewood's letter the more realistic goal is closer to sixty percent (60%).</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. Comments have been acknowledged. Based on feedback on the Draft SEIS alternatives, for the Preferred Growth Alternative, the regionwide goal for population growth in regional growth centers and areas within walking distance of high-capacity transit was set at 65%.</p>
City of Sumner	2	<p>If the region is truly committed to achieving more growth in proximity to transit, one mitigation measure that must be included in the Final SEIS is a commitment to working with the state legislature to make it easier for jurisdictions within the urban growth area to either join an existing transit district or create a transit district. PSRC must use its legislative influence to support legislation that addresses this fundamental flaw in the objective of having housing supported by transit.</p>	<p>VISION 2050 includes a new Regional Collaboration action that directs PSRC, together with its member jurisdictions, to relay the goals and objectives of VISION 2050 to state agencies and the Legislature, in order to promote changes in state law and funding to best advance VISION 2050. Future board discussion will help to identify which issues to focus on.</p>
City of Sumner	3	<p>The growth alternative selected must also address the job-housing balances in a more realistic way. In order to address the current imbalance that is contributing to increasing commute times, more employment is needed in the South Sound. We, as a region, need to work together to identify what steps can be taken to make a more equitable distribution of jobs a reality. This is a complex issue that revolves around such issues as wages and housing prices at the sub-regional level, i.e. can a person afford to live where they work. Sumner echoes Pierce County in that there needs to be more employment in the South Sound. It needs to be more than a paper exercise to identify what steps can be taken to make a more equitable distribution of jobs a reality. The City of Sumner prefers a mix of the Transit Growth Alternative and the Economic Dispersion Alternative. Out of all PSRC jurisdictions and geographic areas, King County has seen the vast majority of economic and job growth in recent years, but slow housing growth by comparison, creating significant transportation congestion. These trends cannot continue. Jobs must be dispersed throughout the Central Puget Sound in order to achieve a myriad of desired outcomes, including but not limited to:</p> <ul style="list-style-type: none"> <li>• alleviating transportation pressure;</li> <li>• improving housing affordability near the workplace;</li> <li>• improving the region's economic resiliency following natural disaster;</li> </ul>	<p>Although PSRC cannot force employers to locate jobs in specific places, VISION 2050 and the preferred growth strategy support the distribution of employment growth across the region in several ways. It shifts the allocation of employment growth from King County to the other counties by 5%. VISION 2050 contains policies to support shared widespread prosperity, living wage jobs, and the planning and conditions that help to create those opportunities. VISION 2050 also contains regional actions to provide support for local economic development planning efforts.</p>

Committer	Comment Number	Comment Text	Response
		<ul style="list-style-type: none"> <li>• improving air quality via less transportation congestion; and</li> <li>• ensuring long term financial viability of all counties and all local jurisdictions.</li> </ul>	
City of Sumner	4	<p>We are hopeful that our comments and concerns will be addressed in either the FSEIS or the draft multicounty planning policies. Our requests reflect the necessity to have a realistic and equitable growth pattern in Vision 2050. This, in conjunction with focused Multicounty Planning Policies, will provide for a meaningful and implementable coordinated regional growth plan to set the stage for the next 30 years.</p> <p>Thank you for the opportunity to comment on the DSEIS for Vision 2050. We look forward to working with PSRC and other member jurisdictions to formulate a preferred alternative that addresses the issues raised in this letter.</p>	Comment noted.
City of Tacoma	1	<p>RE: VISION 2050 Draft Supplemental Environmental Impact Statement Comments</p> <p>Dear Ms. Harris:</p> <p>Thank you for this opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for VISION 2050. The City of Tacoma provides the following recommendations on the regional development strategy:</p> <p>1. Of particular significance to the City of Tacoma in comparing the three alternatives are the set of improvements that "Transit Focused Growth" advances over "Stay the Course":</p> <ul style="list-style-type: none"> <li>-Improved job housing balance</li> <li>-More moderate and high density housing</li> <li>-Significantly more population and employment growth near high capacity transit (HCT)</li> <li>-Greater proximity to HCT for communities of color and low income communities</li> <li>-Less impervious surface added</li> <li>-Less land developed</li> <li>-Less growth in areas with regionally significant habitat</li> </ul> <p>The major drawback to adopting this alternative is that more growth is projected to occur in areas with a higher displacement risk. However, this can and must be offset by adopting a strong set of mitigation measures drawn from the "Potential Mitigation Measures" set forth in Chapter 4 of the Draft SEIS. The analysis of precisely which mitigation measures should be further developed and adopted and must be a part of the Final EIS and incorporated in the updated Multi-County Planning Policies. With this stipulation the City supports the use of the "Transit Focused Growth" alternative over "Stay the Course" alternative.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for the Transit Focused Growth alternative has been acknowledged. VISION 2050 has been updated to include additional considerations, policies, and actions on displacement. See the Regional Collaboration, Development Patterns, Housing, and Economy sections for policies related to displacement.
City of Tacoma	2	<p>2. The City notes that the "Transit Focused Growth" alternative better addresses the new realities of HCT and the expansion of Regional Geographies set forth in Table 3.1-2 to HCT Communities, defined as other cities and unincorporated urban areas-planned for annexation or incorporation-with high capacity transit. HCT is defined as existing or planned light rail, commuter rail, ferry, streetcar, and/or bus rapid transit. Given the work that Pierce Transit is undertaking to secure all the funding necessary to establish bus rapid transit (BRT) from Downtown Tacoma to Parkland and Spanaway, it is helpful and appropriate that Draft SEIS Table 3.1-2 identifies the Tacoma Potential Annexation Area as one of 31 HCT Communities in the region. The City agrees that it is important to the region to carve out HCT Communities from what is otherwise simply Urban Unincorporated Areas, now defined as urban areas without high capacity transit and/or not affiliated for annexation or planned for incorporation. We are also of the opinion that more attention needs to be given to major transit routes that have not yet received the BRT capital investments, but still have significant ridership.</p> <p>On the topic of Table 3.1-2 the City supports the new regional geography of Major Military Installations (installations with more than 5,000 enlisted and service personnel). This formal recognition of the regional and statewide importance for Joint Base Lewis-McChord is timely.</p>	Comments noted.
City of Tacoma	3	<p>The City of Tacoma is adamantly opposed to the "Reset Urban Growth" alternative. The Draft SEIS identifies the following negatives if VISION 2050 were to move from the City of Tacoma's preferred alternative of "Transit Focused Growth":</p> <ul style="list-style-type: none"> <li>-Reduced job housing balance</li> <li>-Less moderate and high density housing</li> <li>-Significantly less population and employment growth near high capacity transit (HCT)</li> <li>-Less proximity to HCT for communities of color and low income communities</li> <li>-More impervious surface added</li> <li>-More land developed</li> <li>-More growth in areas with regionally significant habitat</li> </ul> <p>Certainly there would be a reduced displacement risk but this can and must be offset by adopting a strong set of mitigation measures drawn from the "Potential Mitigation Measures" set forth in Chapter 4 of the Draft SEIS. The analysis of precisely which mitigation measures should be further developed and adopted must be part of the Final EIS and incorporated in the updated Multi-County Planning Policies.</p> <p>Finally, this alternative is in direct conflict with the State Growth Management Act's mandate of reducing sprawl (Draft SEIS, page 3) and the objective of the Regional Growth Strategy of "Within urban growth areas, focus growth in cities" (Draft SEIS, page 4).</p>	The city's opposition to the Reset Urban Growth alternative has been acknowledged.

Commenter	Comment Number	Comment Text	Response
City of Tacoma	4	<p>3. The City strongly supports the Regional Growth Strategy of adjusting employment shares to encourage additional employment growth in Kitsap, Pierce, and Snohomish Counties (Draft SEIS, page 84).</p> <p>It is important to highlight that VISION 2050 and its associated Draft SEIS builds on VISION 2040 and the Final Environmental Impact Statement (FEIS) associated with VISION 2040. The Draft SEIS explicitly recognizes this on page 78 which states:</p> <p>"Build on VISION 2040. In order to comply with the objectives and mandates of the state GMA and to fulfill the purpose and need for action, VISION 2050 builds on the base of the policies and actions and Regional Growth Strategy adopted in VISION 2040." The focus of the update is to clarify aspects of the vision and make improvements that reinforce a common regional vision of greater environmental sustainability, access to prosperity, and a high quality of life. VISION 2050 is anticipated to continue to reflect GMA's objectives of containing the expansion of urban areas; conserving farmlands, forests, and open spaces; supporting more compact, people oriented living and working places; and focusing a significant amount of new employment and housing into cities with vibrant urban centers."</p> <p>As you know, if a fundamental change in direction from VISION 2040 to VISION 2050 was anticipated a SEIS would not be appropriate and a new Draft and Final EIS would be necessary. The City submits that the "Reset Urban Growth" alternative as developed in the Draft SEIS represents such a fundamental change that it far exceeds the scope of a SEIS. To pursue such sweeping changes would necessitate the development of a new FEIS.</p> <p>Further, the "Reset Urban Growth" alternative as developed in the Draft SEIS on its face fails the threshold test set up in the Executive Summary page 3 which states:</p> <p>"Each of these three alternatives is intended to help preserve resource lands, protect rural lands from urban-type development, and promote infill and redevelopment within urban areas to create more compact, walkable, and transit-friendly communities."</p> <p>It also fails the first part of the overall test on Draft SEIS page 78 quoted above as it does not in any shape, fashion, or form "...make improvements that reinforce a common regional vision of greater environmental sustainability, access to prosperity, and a high quality of life...". Finally, it fails the second part of the overall test on Draft SEIS page 78 as it fails in "...supporting more compact, people oriented living and working places; and focusing a significant amount of new employment and housing into cities with vibrant urban centers".</p> <p>Again, thank you for this opportunity to comment.</p> <p>Sincerely,  Elizabeth Pauli  City Manager</p> <ul style="list-style-type: none"> <li>Reduced job housing balance</li> <li>Less moderate and high density housing</li> <li>Significantly less population and employment growth near high capacity transit (HCT)</li> <li>Less proximity to HCT for communities of color and low income communities</li> <li>More impervious surface added</li> <li>More land developed</li> <li>More growth in areas with regionally significant habitat</li> </ul> <p>Certainly there would be a reduced displacement risk but this can and must be offset by adopting a strong set of mitigation measures drawn from the "Potential Mitigation Measures" set forth in Chapter 4 of the Draft SEIS. The analysis of precisely which mitigation measures should be further developed and adopted must be part of the Final EIS and incorporated in the updated Multi-County Planning Policies.</p> <p>Finally, this alternative is in direct conflict with the State Growth Management Act's mandate of reducing sprawl (Draft SEIS, page 3) and the objective of the Regional Growth Strategy of "Within urban growth areas, focus growth in cities" (Draft SEIS, page 4).</p>	Comments noted.

Committer	Comment Number	Comment Text	Response
City of University Place	1	<p>RE: VISION 2050 Draft Supplemental Environmental Impact Statement</p> <p>To Whom It May Concern:</p> <p>Thank you for the opportunity to review and comment on the VISION 2050 Draft SEIS. The City of University Place has similar concerns to those expressed by other Pierce County jurisdictions. Specifically, we have concerns about how the FEIS and VISION 2050 will impact our city's ability to plan for its unique future under one-size fits all mandates that may be contrary to a locally-sensible allocation of limited resources.</p> <p>1. We agree with Bonney Lake's and Lakewood's assertions that growth management planning should follow a bottom-up approach, rather than top down directives from the regional planning agency. Any mitigation identified in the FEIS, along with any multicounty polices and related actions, should represent guidance, rather than reflect mandated requirements or conditions for comprehensive plan certification. This is not to say that mitigation measures, policies and actions can be ignored, however. We recognize they are necessary to implement whichever alternative (or hybrid of alternatives) is eventually adopted and meets requirements for federal transportation funding.</p> <p>2. Likewise, growth targets for population, housing and employment must be flexible, perhaps by providing a range of estimates, not unlike the Office of Financial Management's low, medium and high population forecasts. Doing so will recognize other factors that influence planning for growth and growth itself. For example, growth targets assigned the City were informed by the 2014 Pierce County Buildable Lands Reports and allocations adopted by County Ordinance. A low persons per household number, which we objected to at the time, required us to plan for far more housing units than needed for certification. Since that time, the persons per household number has been reevaluated and increased significantly in preparation for the next buildable land report.</p> <p>3. Ultimately, market and other forces will determine growth rates, as demonstrated by local trends in comparison to regional forecasts. Unless we recognize this, jurisdictions will continue defending their growth (or lack of thereof) as "bending the trend," suggesting that they may be growing slower or faster than targets suggest they should and making up the difference in later years. Planning for more or faster growth than will likely occur has significant impacts on the allocation of limited resources to plan for and build supporting infrastructure and produces false expectations of what is needed.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. Target setting at the countywide level will provide flexibility and the opportunity to consider the unique circumstances of each jurisdiction, including market trends.</p>
City of University Place	2	<p>4. The City supports a growth pattern that emphasizes compact mixed-use development, supports transit, regional growth centers and a better jobs housing balance that might result from a hybrid of the "Stay the Course" and "Transit Focused" alternatives. However, we think it is unrealistic to expect that 75% of growth will occur within ½ mile of a High Capacity Transit, except perhaps in King County. A dramatic shift in society and the economy would need to occur to produce such a result, even with a 30-year horizon, given the slow rate at which High Capacity Transit is being rolled out.</p> <p>5. Similarly, creating a better job/housing balance throughout the region will require a significant change in the distribution of area employers, much higher costs of commuting, and/or a redistribution of funds for infrastructure improvements to support employment opportunities.</p>	<p>The city's preference for a hybrid alternative has been acknowledged. Based on feedback on the Draft SEIS alternatives, for the Preferred Growth Alternative, the regionwide goal for population growth in regional growth centers and areas within walking distance of high-capacity transit was set at 65%. Although PSRC cannot force employers to locate jobs in specific places, VISION 2050 and the preferred growth strategy support the distribution of employment growth across the region in several ways. It shifts the allocation of employment growth from King County to the other counties by 5%. VISION 2050 contains policies to support shared widespread prosperity, living wage jobs, and the planning and conditions that help to create those opportunities. VISION 2050 also contains regional actions to provide support for local economic development planning efforts.</p>
City of University Place	3	<p>6. The potential mitigation measures provided in the Draft SEIS are vague and leave a lot to the imagination. For example, under Housing and Employment, use of the phrase "Mitigate transportation impacts to promote economic prosperity and quality of life," and under Transportation, use of the phrase "Adopt and implement policies that reduce the impacts of growth." Will these mitigation measures be more well defined in Multicounty planning policies developed after the preferred alternative is chosen?</p> <p>Once again thank you for the opportunity to comment on the VISION 2050 Draft Supplemental Environmental Impact Statement, we look forward to providing additional comments on the Draft VISION 2050, the Regional Grow Strategy and Multicounty Planning Policies.</p> <p>Should you have any questions, please do not hesitate to contact me at (253) 460-2519 or <a href="mailto:DSwindale@cityofup.com">DSwindale@cityofup.com</a></p> <p>Sincerely, David Swindale, AICP Director, Planning and Development Services</p>	<p>The mitigation measures helped to identify VISION 2050 policies.</p>
City of Woodinville	1	<p>Dear Puget Sound Regional Council Executive Board:</p> <p>The City of Woodinville wishes to thank PSRC for the robust public outreach process undertaken with regard to the development of the Draft Supplemental Environment Impact Statement (SEIS), including taking into consideration the City of Woodinville's comments herein.</p> <p>As presented, the Draft SEIS reviews the environmental impacts of three regional growth alternatives for VISION 2050: "Stay the Course (No Action)"; "Transit-Focused Growth"; and "Reset Urban Growth". The City of Woodinville encourages PSRC to carry forward "Transit Focused Growth" as the preferred alternative for several reasons. Focusing growth around transit hubs will positively impact residents, businesses, visitors, and employees in a number of ways, including reducing greenhouse gas emissions, vehicle delays, and improving the region's job access and jobs-housing balance. The remaining alternatives do not perform nearly as well among many of these metrics. Improvement in each of these issue areas becomes increasingly important as the region's population is expected to grow by 1.7 million people over the next 30 years, making the "Transit-Focused Growth" alternative the right choice.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The city's preference for the Transit Focused Growth alternative has been acknowledged.</p>

Commenter	Comment Number	Comment Text	Response
City of Woodinville	2	Further, Woodinville has made a concerted effort to plan for and encourage growth in a way that aligns with and supports the "Transit-Focused Growth" alternative. As an example, many of the expected developments in the City over the next five years (currently in various stages of planning and with some under construction) are high-density and mostly located in the downtown core near the City's existing Park & Ride. The City has also recently revised its multi-family tax exemption program to further encourage and expand diverse, affordable, and high-density housing options within areas of the City that have the infrastructure and transit availability to support it.	Planning efforts noted.
City of Woodinville	3	As PSRC continues to develop the Draft SEIS and Vision 2050, the City also asks the Council to be mindful and supportive of communities that do not yet have robust transit options. Woodinville and other municipalities outside of major transit and employment hubs only now have the opportunity to advocate and plan for expansion of transit options. These cities need future support from agencies such as PSRC, Sound Transit, King County Metro and others to facilitate growth in a smart and efficient manner. In short, Woodinville asks PRSC to look beyond existing transit hubs and plan for resources and support for areas that will undergo increases in transit demand in the future.	Comment acknowledged.
City of Woodinville	4	Woodinville intends to follow this process closely to understand each approach's implications with regard to job and population figures. The City also asks that PSRC take into consideration jurisdictions' comments on these calculations as they have implications for cities' planning efforts as well as other regional and County plans.  Thank you again for the opportunity to participate in the development of PSRC's Draft SEIS and Vision 2050. The City looks forward to continuing to partner with the agency and others as the region continues to grow and develop into one of the country's most livable.  Sincerely, Mayor Elaine Cook Woodinville City Council	Comment noted.
Joint letter: City of Shoreline, City of Woodinville, City of Kenmore, City of Lake Forest Park, City of Bothell	1	Dear Mr. Inghram:  The cities of Kenmore, Bothell, Lake Forest Park, Shoreline and Woodinville are jurisdictions located along the SR-522 bus rapid transit corridor. We are working collaboratively towards achieving a common goal supporting transit connections between our cities to the regional light rail system. As such, we offer support of the Transit-Focused Growth alternative described in the Vision 2050 Supplemental Environmental Impact Statement. This alternative recognizes the significant investment in transit and supportive land uses that our communities are making.  Locating new housing and employment in areas well-served by high-capacity transit has the potential to reduce car trips, impervious surface and greenhouse gas emissions, among other benefits. The Transit-Focused Growth alternative is the most environmentally sustainable of the three alternatives and will provide the most benefit to the residents and businesses in our communities.  Thank you for considering our comments. If you have any questions, please do not hesitate to reach out to us.  Sincerely, David Baker, Mayor City of Kenmore Jeff Johnson, Mayor City of Lake Forest Park Will Hall, Mayor City of Shoreline Andy Rheaume, Mayor City of Bothell Elaine Cook, City of Woodinville	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The cities' preference for the Transit Focused Growth alternative has been acknowledged.
Seattle Public Schools	1	Chart: DEIS questions > Policy area V   Does this element sufficiently tackle race and social equity?   Is the DEIS analysis of circumstances and impacts correct? What's missing? What benefits do we want to emphasize? What disproportionate burdens do we want to avoid?   Mitigation - What is good or insufficient? What's missing?   Accountability - How can we focus on action and implementation?   Accountability - How can we use targets, performance measures, and consequences?	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS.

Commenter	Comment Number	Comment Text	Response
Seattle Public Schools	2	<p>Affordable Housing</p> <p>-This topic really needs to be addressed from the point of view of families who need this type of housing most.</p> <p>-My concern is that when "Affordable rents" are determined by the 30-60% AMI. As income levels are sure to rise in the city/region, the type of family and resident applying for and opting into this type of housing will vary and change with time. I think of the Central District as a hub/urban village where population is going to increase, transportation improvements will be made, and rents will be set to market rate if not a bit higher.</p> <p>-What exactly is affordable housing? The terms "Affordability" and "Affordable Housing" as they relate to Seattle/Puget Sound should clearly and plainly be called out in the Vision 2050 DEIS. My last comment is that there seems to be housing for those with the lowest incomes (families and individuals) and for higher income owners, are there any plans to make housing affordable to middle income families and individuals?</p>	<p>VISION 2050 has been updated to include additional considerations for housing. Housing needs assessments will need to be updated with the latest income and housing data on an ongoing basis. Affordable housing and housing affordability were defined in the Housing section of VISION 2050, as suggested. Provisions in the Housing section call for providing a range of housing types and choices to meet the housing needs of all income levels and demographic groups within the region.</p>
Seattle Public Schools	3	<p>Housing Density</p> <p>-Are the 2050/PSRC ideas and plans around housing density aligned with the city's plans and their plans and understanding of how urban villages will be supported/built out?</p> <p>-I worry that not enough talking is happening between planning departments.</p> <p>-The City's OPCD has a loose Planning and Technical Partnership with the Seattle School District. I serve on that committee representing for the enrollment planning team and I'm happy to share the two reports that came out of our discussion and meetings.</p>	<p>The City of Seattle helps to provide alignment between city and regional policy by participating in PSRC boards and committee. The Planning and Technical Partnership reports would be appreciated.</p>
Seattle Public Schools	4	<p>Transportation commute times</p> <p>-The commute times are much longer given that more people choose to move and/or forced out of the city center and its surrounding areas. Rents have increased, evictions are on the rise. However, most jobs are still located in the city center. People will make the commute to make more money and support themselves and their families.</p> <p>-The investment in infrastructure is commendable; however, I think some residents are confused by the renovated Hwy 99 and the toll that is supposed to come soon. There are several transportation related projects happening all at once, but there isn't one website that provides timely updates in a readable and accessible format. If residents know which routes are safe and easy to access as alternatives to their regular and "under construction" routes, they will feel empowered and safer on the road.</p>	<p>Comments acknowledged.</p>
Seattle Public Schools	5	<p>Transportation safety</p> <p>-Does this relate to bicycle lanes?</p> <p>-I think a lot of residents aren't familiar with the new modes of transportation throughout the city and region. Is there a way to better communicate about the tram/trolley/limited bus route information in a more effective way?</p> <p>-The roads are narrower given bike and bus lanes. It forces drivers to slow down which is a good thing, but it also slows down traffic, and not everyone is considerate of cyclists and the changes coming online, especially if they weren't apart of the decision-making process.</p>	<p>Transportation safety for VISION 2050 relates to all modes of transportation. Safety strategies are planned and implemented by cities, counties and agencies; however, VISION 2050 promotes safety through policies and actions in the Transportation section.</p>
Seattle Public Schools	6	<p>Health</p> <p>-Provide Free and "pop up" clinics</p> <p>-I only know about the 1 day a year that free healthcare and dental care is offered to low income residents, and it is usually held at the Seattle Center. Maybe encourage that other locations be considered and maybe 2 days/year where one day is in the Spring and Fall to spread it out. One location is north downtown (Seattle) and the second day in south king county (place TBD). It makes sense that the city center has been the primary location, but as demographics shifts by who can afford to live in the city center, we (researchers and planners) need to be proactive and meet residents where they live now.</p>	<p>The pop up clinic suggestion has been added to the Environmental Health mitigation measure on improving education related to environmental and public health.</p>
Seattle Public Schools	7	<p>Air Quality</p> <p>-Are construction zones using the best materials, recycling and disposing of materials in the best and most cost-efficient ways?</p> <p>-I work near the "Lander Bridge" project and the workspace gets larger by the day. It would be interesting to measure the impact on traffic, walkability, and pollution released into the air for several major projects across the region. Maybe a page on a frequently used "Transportation website" could provide the ecological footprint details.</p>	<p>A mitigation measure has been added to address air quality impacts from construction.</p>
Seattle Public Schools	8	<p>Water</p> <p>-Some local schools need cleaner water, particularly in the southeast of the school district</p> <p>-What are the targeted efforts to include the Southeast and Southwest parts of cities within King County/Puget Sound in the 2050 plans? This should be explicitly called out in the report and DEIS. It is time to center those communities and voices.</p>	<p>The Public Services section of VISION 2050 calls for providing access to high quality drinking water for the region's residents. A new policy has been added to promote affordability and equitable access of public services to all communities, especially the historically underserved.</p>
Seattle Public Schools	9	<p>Land Use – Schools</p> <p>-Has the PSRC engaged the local school districts? If yes and yes with Seattle Public Schools, who is the primary contact/department?</p> <p>-Seattle Public Schools has a few departments that could contribute to this section in a meaningful way.</p> <p>-I'm happy to provide contact information for SPS staff most relevant to this topic. Namely Budget, Capital Planning, Enrollment Planning, Admissions, etc.</p> <p>** Displacement **</p> <p>-The City's OPCD organized a "Displacement Researchers Roundtable" led by Diana Canzoneri. I would offer that you reach out to her to retrieve those notes and the displacement risk indicators outlined in their ongoing study.</p> <p>-Try to distinguish which displacement is considered forced (eviction, etc.) and by choice (relocation). Some people leave because a place (neighborhood, school, etc.) is no longer familiar, inclusive, recognizable. Do housing partners like SHA/Mercy Housing/Solid Ground have any data to support any efforts made to keep the families most</p>	<p>PSRC provides notice to all school districts in the region. Contact information is provided by the state Office of Superintendent of Public Instruction. Receiving contact information to learn more about school needs and planning would be appreciated. The City of Seattle provided input on the methodology for the displacement risk analysis.</p>

Commenter	Comment Number	Comment Text	Response
Seattle Public Utilities	1	<p>vulnerable for displacement within the city or current neighborhood? I'm thinking some relocation is based on voucher approval and housing options in certain neighborhoods, perhaps that are more "desirable" than others.</p> <p>VISION 2050 Comments on Supplemental Environmental Impact Report Seattle Public Utilities, April 17, 2019</p> <p>Drinking Water</p> <p>The analysis of alternatives of Public Service and Utilities (4.7) indicates water supply impacts will be the same for all alternatives, although there are differences noted for stress to existing infrastructure and need for expansion of infrastructure. The analysis should take into consideration that higher densities under the Transit Focus Growth Alternative would likely result in lower total water use in the future than the other alternatives due to the lower water use per housing unit associated with multi-family and denser housing.</p> <p>The affected environment, 2.15 Earth and 2.9 Public Services and Utilities, could be improved by including a summary of the recent studies conducted by the Water Supply Forum to look at seismic risks to water infrastructure.</p> <p>Drainage and Wastewater</p> <p>General comment / ES-18: Urban infrastructure needs associated with the alternatives are not well depicted by the table. Our existing urban wastewater (i.e., sewer) systems will have significant repair and replacement needs between now and 2050 – this is common across the alternatives, but not really addressed by the Exec Summary. Also, increasing growth and density in cities increases risks to human health and safety associated with stormwater or wastewater system failures, flooding etc. caused by a seismic event or increased by climate change. This is covered lightly in the document, so it's probably fine as is.</p> <p>Page 48 (this concept is also in ES-18 table): "In addition, redevelopment of areas with outdated stormwater infrastructure can result in improvements to water quality through upgrades and improvements to stormwater management." I think it would be more accurate for Seattle if it said something like: In addition, stormwater management requirements for redevelopment can result in improvements to water quality.</p> <p>Solid Waste</p> <p>Reference Comment Chapter 2, starting on page 9.</p> <p>Does not address how solid waste stream or infrastructure has changed since Vision 2040. This might be addressed in Section 2.9 Public Services and Utilities.</p> <p>Figure 2.6-2 on page 42 It should be noted that a consumption-based inventory would show goods and materials as having a much larger contribution to emissions. This alternative approach indicates addressing full life cycle impacts of materials management is worth deeper effort than the scant effort needed to address "solid waste" when those emissions are only shown as 2%. (See Figure ES-5 in <a href="https://your.kingcounty.gov/dnrp/climate/documents/2015-KC-GHG-Inventory-Exec-Summary.pdf">https://your.kingcounty.gov/dnrp/climate/documents/2015-KC-GHG-Inventory-Exec-Summary.pdf</a> or Figure ES-4 in this report <a href="https://zerowasteurope.eu/downloads/the-potential-contribution-of-waste-management-to-a-low-carbon-economy/">https://zerowasteurope.eu/downloads/the-potential-contribution-of-waste-management-to-a-low-carbon-economy/</a>)</p> <p>Pg. 138. "Solid Waste: Expansion of existing and/or addition of new transfer stations would likely be needed to accommodate increased solid waste generation." Recommend deleting this bullet. We do not agree this is a logical conclusion.</p> <p>Pg. 141. Potential Mitigation Measures: Public Services and Utilities, "Topic: Solid Waste · Implement conservation measures, with emphasis on increased recycling* · Promote green waste practices throughout the region, including curbside composting service, work site composting, and yard waste collection · Educate residents on proper waste disposal · Assist schools in conservation practices and involve them in educational opportunities · Pursue opportunities to divert waste from landfills" Replace bullets with: · Implement significant waste prevention measures, including supporting reuse, repair, and food rescue efforts in our communities and promoting sustainable consumption. · Divert all organics from landfill disposal, including food, yard and garden, compostable materials, and wood – and into adequately sized and sited organics processing facilities. · Ensure all residents (including multifamily) and businesses have or have access to recycling and organics collection services · Ensure collected materials are responsibly managed and become feedstock in the manufacture of new products. · Establish a circular economy approach in the region, working with the private sector to develop needed processing, sorting, and remanufacturing capacity for our recyclables and organic materials. (This includes working to bring new transformative technologies to the region to increase options for the management of difficult materials, such as plastic packaging.) Our exported waste materials must not create social and environmental harm in other countries and other communities. · Establish product stewardship systems that ensure widespread access to services and responsible management of those materials. · Ensure all community members are provided equitable services and are equitably engaged in outreach and educational efforts, including through transcreation of messages and materials. · Ensure that processed organic materials are returned to soils for the maximum carbon sequestration value.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. Many of these suggestions have been included in the Final SEIS.
Seattle Public Utilities	2	<p>Environmental Justice/Service Equity</p> <p>Section 5.7. Mitigations to prevent displacement are lean. While affordable housing is important other factors to support food security and pathways to financial opportunities and success should be considered. Possible language:</p> <p>Promote local programs to develop and support community anchoring activities like job training and small business development programs, job search services, community gardens, food banks and community low income support service centers.</p> <p>Promote planning processes and partnerships to create pathways to living wage careers.</p> <p>Section 5.8. In the Significant Unavoidable Adverse Impacts, the statement, "Implementation of the mitigation measures listed in Section 5.7 and Section 4.1 of this Draft SEIS would help reduce or avoid these impacts" should be modified. Recommend removing the word "avoid" as it has not been demonstrated these actions would fully avoid the impacts.</p>	Additional mitigation measures have been added to address potential displacement impacts.

Commenter	Comment Number	Comment Text	Response
Joint letter: King County, City of Burien, City of Kent, City of Kirkland, City of Redmond, City of Shoreline, City of Seattle, City of Tukwila	1	<p>Dear Puget Sound Regional Council:</p> <p>King County is successfully implementing the region’s blueprint for growth – VISION 2040. The county and cities planning under the Growth Management Act are focusing growth inside the Urban Growth Area (UGA) to create vibrant urban centers, protect natural resource lands and rural areas, and direct public investments in support of efficient land use. King County is creating a path toward a sustainable future for our communities and the people who will live there.</p> <p>The central Puget Sound region must continue this foundational work into VISION 2050. Our comments on the regional growth pattern alternatives reflect this look to the future. The region faces important challenges as counties and cities work together to plan collaboratively for the 1.8 million new people and 1.2 million new jobs expected by 2050. The Draft Supplemental Environmental Impact Statement (DSEIS) analyzes the impacts of three alternative future growth patterns – Stay the Course (no action), Transit Focused Growth (ambitious investments in transit oriented development), and Reset Urban Growth (a more dispersed growth pattern). As noted below, Transit Focused Growth clearly performs better than the other alternatives across a range of outcomes that reflect the values of the region and reinforce the direction of current plans.</p> <p>The preferred regional growth pattern should:</p> <ul style="list-style-type: none"> <li>Maintain integrity of the Urban Growth Area (UGA).</li> <li>Prioritize accommodating housing and jobs in cities and centers.</li> <li>Build on opportunities and investments in an expanded regional transit network.</li> <li>Advance racial and social equity as a cornerstone of the plan in policies and actions.</li> <li>Promote a variety of housing types while addressing housing affordability for all residents, especially for those in the lowest income categories.</li> <li>Reduce greenhouse gas emissions and avoid significant environmental impacts.</li> </ul>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The county's and cities' preference for the Transit Focused Growth alternative has been acknowledged.
Joint letter: King County, City of Burien, City of Kent, City of Kirkland, City of Redmond, City of Shoreline, City of Seattle, City of Tukwila	2	<p>Maintain integrity of the Urban Growth Area</p> <p>Our success planning under the state Growth Management Act continues to direct growth inside the UGA. This supports vibrant urban centers, an efficient transportation system, sustainable rural areas, and protected natural resource lands. King County believes the Transit Focused Growth alternative performs best at maintaining UGA integrity. This alternative directs more of the countywide growth into the UGA than either Stay the Course or Reset Urban Growth and results in less growth within a quarter-mile of the UGA boundary than either of the latter two patterns.</p>	Comment noted.
Joint letter: King County, City of Burien, City of Kent, City of Kirkland, City of Redmond, City of Shoreline, City of Seattle, City of Tukwila	3	<p>Prioritize accommodating housing and jobs in cities and centers</p> <p>Directing growth to cities benefits the largest number of our residents and workers as the region efficiently uses its public infrastructure. Transit Focused Growth directs the most population growth to the Metropolitan and Core cities best situated to receive such growth; Reset Urban Growth directs growth away from those cities (less so in King County because our growth pattern is more established).</p> <p>The preferred alternative, in any case, must acknowledge the challenges with providing additional school infrastructure to serve new growth. This is particularly true as new residential development is directed to cities and centers with limited land supply. As such, the preferred alternative must include proactive planning strategies to address school capacity needs where feasible school sites may not be available or where unique planning tools must be employed to facilitate school siting on constrained or nontraditional sites.</p>	To support the preferred growth strategy, VISION 2050 has policies in the Regional Growth Strategy, Development Patterns, Housing, and Economy sections that prioritize job and housing growth in cities and centers. VISION 2050 acknowledges the challenge of siting new schools in the Public Services section.
Joint letter: King County, City of Burien, City of Kent, City of Kirkland, City of Redmond, City of Shoreline, City of Seattle, City of Tukwila	4	<p>Build on opportunities and investment of an expanded transit network VISION 2040 was approved before Sound Transit voters approved light rail extensions (ST2 and ST3), which will result in a 116-mile regional light rail system. Local transit agencies have adopted long range plans, such as Metro Connects, implementing VISION 2040 transportation components. The preferred alternative for VISION 2050 must recognize land use opportunities presented by these future regional transportation systems as they become more transit-oriented and create more opportunity for all of our communities.</p> <p>The preferred growth pattern must acknowledge how both Sound Transit and local transit system expansions will guide the region into the future. Transit Focused Growth – by definition – directs the most growth to the locations closest to high capacity transit. The alternative shows a greater increase in transit trips because of King County growth locating in proximity to transit than either Reset Urban Growth or Stay the Course.</p>	VISION 2050 has been updated to include additional provisions to promote transit-oriented development and efficient land use patterns. See the following section: Regional Growth Strategy, Development Patterns, Housing, and Economy.
Joint letter: King County, City of Burien, City of Kent, City of Kirkland, City of Redmond, City of Shoreline, City of Seattle, City of Tukwila	5	<p>Advance racial and social equity as a cornerstone of the plan in policies and actions</p> <p>As the region continues to grow, communities that are majority low-income and include Native American/Alaska Native peoples, people of color, immigrants, refugees, and those who speak limited English will face substantial and disproportionate displacement pressure in all of the alternatives. Due to historic patterns of disinvestment and undervaluation, community-driven, place-based anti-displacement strategies must be part of VISION 2050.</p> <p>VISION 2050 should mitigate against this increased displacement pressure by pursuing regional strategies and local actions that preserve and add to the region’s affordable housing stock, create family-wage jobs, and ensure access to transit. Equitable outcomes can only be realized through targeted mitigation across the region. Regional and local actions must also prioritize quality of life improvements for communities most in need.</p>	VISION 2050 has been updated to include additional considerations on equity and displacement. See the following sections for equity and displacement related polices and actions: Regional Collaboration, Development Patterns, Housing, Economy, Transportation, and Public Services.

Commenter	Comment Number	Comment Text	Response
Joint letter: King County, City of Burien, City of Kent, City of Kirkland, City of Redmond, City of Shoreline, City of Seattle, City of Tukwila	6	<p>To this goal, Transit Focused Growth– with the right strategies and implementation measures–locates the most housing and jobs closest to high capacity transit. This creates the greatest opportunity for all communities. Transit Focused Growth is the best framework for equitable growth as the region gets intentional about housing affordability and an inclusive economy.</p> <p>Promote a variety of housing types while addressing housing affordability for all residents, especially for those in the lowest income categories.</p> <p>As the region grows, a variety of density options creates the greatest opportunity for housing affordability. Locating more housing closer to transit allows households to forego a car, which can decrease their monthly expenses. Transit Focused Growth has the greatest share of high density growth in King County, with the highest concentrations of growth closest to high capacity transit.</p> <p>While high density growth is important for achieving our environmental and growth management goals, to mitigate impacts to the region’s affordability, VISION 2050 should include strategies that encourage middle-density housing development. Middle density housing that provides opportunity for more affordability, entry level homeownership, and larger units suitable for families, can create much needed housing options for low and moderate income households.</p>	VISION 2050 has been updated to include additional housing provisions. A new policy to promote moderate density housing was added to the Housing section.
Joint letter: King County, City of Burien, City of Kent, City of Kirkland, City of Redmond, City of Shoreline, City of Seattle, City of Tukwila	7	<p>Reduce greenhouse gas emissions and avoid significant environmental impacts.</p> <p>Projected changes in the climate are likely to have widespread impacts for the region’s population and a disproportionate effect on its most vulnerable residents. Reducing greenhouse gas emissions not only helps to mitigate against climate change, but will also improve air quality, particularly for populations living close to where emissions are reduced. Low income neighborhoods and those with a higher proportion of people of color tend to be in locations with significant industrial and transportation emission sources.</p> <p>VISION 2050 should incorporate greenhouse gas emission reduction goals to assist the region in eliminating the disproportionate burden of such environmental impacts on majority low-income communities, Native American/Alaska Native peoples, people of color, immigrants and refugees, and those who speak limited English. The King County-Cities Climate Collaborative (K4C) has countywide greenhouse reduction goals and the Puget Sound Clean Air Agency has region-wide reduction goals. These established goals should serve as the basis for VISION 2050’s greenhouse gas reduction goals.</p> <p>While CO2 emissions decrease in all the alternatives, Transit Focused Growth sees the greatest reduction while Reset Urban Growth the least reduction. The Transit Focused Growth alternative provides cumulative benefits of having a more compact development pattern rather than a sprawling form. The Transit Focused Growth alternative develops the least amount of land while the Reset Urban Growth alternative develops the most. This creates the greatest opportunity to protect our ecosystems, farmland, and forestland while establishing a sustainable rural area and vibrant urban core.</p> <p>Thank you for your consideration.</p> <p>Sincerely,</p>	VISION 2050 has been updated to include additional consideration and strategies to address climate change, including addressing impacts to vulnerable populations. See the new stand-alone climate change section.
Kitsap County	1	<p>Dear Executive Director Josh Brown,</p> <p>Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050. Kitsap County has reviewed the available documents including VISION 2040 and the draft alternatives for the forthcoming plan policy document.</p> <p>The Puget Sound region has seen significant growth over the past ten years, much of which was inconsistent with the estimates and targets of VISION 2040. Other than Seattle, the metropolitan jurisdictions grew far slower than targeted while small cities and unincorporated areas grew faster as citizens sought cost-effective housing. Employment continued to locate primarily in the Seattle/King County area requiring extended commutes from affordable residential areas to this employment center. Transit ridership and opportunities such as light rail was developed yet traffic congestion grew at an advanced rate.</p> <p>To date no clear analysis of how reality failed to meet VISION 2040’s targets for most of the region and which policies were ineffective has been made available. Yet, the VISION 2050 DSEIS uses this past plan as the base for its policies and targets.</p> <p>While the goals of VISION 2050 are largely sound, they will require monumental shifts in the market to achieve. With no documented success of VISION 2040’s principles and absent any analysis explaining these outcomes documented in the Regional Growth Strategy background paper, “doubling-down” in VISION 2050 requires significant faith. Faith needing to be backed up not by PSRC but by member jurisdictions’ policies, staff time and efforts.</p> <p>VISION 2050 as guidance</p> <p>In 2008, VISION 2040 was a largely considered a guidance document, intended to provide an overarching framework of goals for the region. These goals are important yet in many cases very aspirational. VISION’s inclusion of targets for population and employment take these aggressive goals and create obligations that are the responsibilities of the member jurisdictions not PSRC. This is often illustrated as an effort to “bend the trend” and local jurisdictions have sought to meet them to varying degrees of success. However, some of the VISION 2050 alternatives included in the DSEIS go beyond “bending” to manifestly recreating this trend. They require shifts that have no historical precedent in our region and only academic support.</p> <p>As guidance, aspirational is logical and appropriate. PSRC should encourage outcomes that benefit the transportation system, environment, public health and general public. However, through the certification process, these aspirations appear and function more as regulatory requirements to local jurisdictions. Proposed growth targets such as those in Transit-Oriented Growth alternative are concerning as a regulatory requirement. Additionally, the changes or additions to VISION (e.g., growth targets, housing affordability, climate change, and public health) have regulatory agencies with their own requirements and metrics (GMA, Departments of Ecology and Health, and FEMA, for example). The transportation funding whose distribution is PSRC’s primary focus is either inadequate or ineligible for use on many of these goals.</p> <p>PSRC must not create obligations for local jurisdictions that are grossly aspirational while not adequately supporting them with funding or other direct assistance.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. Comments noted.

Commenter	Comment Number	Comment Text	Response
Kitsap County	2	<p>Regional geographies and their criteria</p> <p>Generally, the revised regional geographies are a positive step forward for VISION. Promoting growth around high-capacity transit (HCT) in the RGS is a sound planning principle. It is this infrastructure that will be important to promoting density, accommodating growth and affecting transportation congestion.</p> <p>However, sound planning principles are absent from other criteria such as the incorporated versus unincorporated distinction. To be a HCT community with an increased population target, an area must be within an urban growth area (UGA), include a future or planned HCT terminal AND be incorporated or specifically planned for incorporation or annexation. Per GMA, generally all UGAs are intended for future incorporation or annexation. Annexation law does not empower local jurisdictions to change their status regardless of a plan policy.</p> <p>This distinction is arbitrary at best and punitive at worst. All UGAs must plan for urban densities and provide supporting infrastructure and services regardless of their incorporated status. They are impacted by existing or planned HCT, exactly the same as cities. They have the same growth pressures as cities. Why would we target less population to them based solely on their temporary governmental model? It will only ensure future inconsistencies between developed growth and VISION 2050.</p> <p>By limiting growth potential, we relegate these UGAs to low-density residential development reducing their attractiveness for annexation by existing cities and diminishing their abilities to incorporate into financially-sustainable new cities. Additionally, PSRC will impede the county's use of GMA-mandated reasonable measures (upzones, infill development, etc.) to avoid future UGA expansions.</p> <p>The existence of HCT should be the priority for targets, not arbitrary criteria unfounded by logical planning or market principles.</p>	<p>Counties and cities are able to identify and plan areas for potential incorporation or annexation in order to meet this aspect of the HCT Communities geography. This geography classification helps identify those locations with greater capacity to accommodate growth. The Preferred Growth Alternative has incorporated changes as recommended by Kitsap communities.</p>
Kitsap County	3	<p>Alternatives and their population targets</p> <p>The DSEIS includes three alternatives, two action (Transit Focused Growth and Reset Urban Growth) and one no action (Stay the Course). For the two action alternatives, Kitsap County's regional share of growth is reduced from 11% to 5%. This reduction, while the largest change of all of the counties in VISION 2050, seems to be supported by OFM Intermediate population estimates. This reduction to 5% may be appropriate for future local planning in Kitsap but may be too little based on the issues detailed below.</p> <p>The distribution of this regional growth percentage creates issues. For Kitsap, they specifically impact Silverdale and our other unincorporated UGAs. In the alternatives, Silverdale is a core city and allocated a specific population. Silverdale also includes a designated Regional Center, where significant growth is to be focused. There appears to be a disconnect in Silverdale's proposed allocation and the requirements to maintain its Center status (activity unit thresholds). Kitsap's plans can work to achieve one or the other, but not both. They will either greatly exceed the population allocation (a problem in recent certifications of other jurisdictions) or fall short of the Regional Centers criteria.</p> <p>The other issue is with the Unincorporated UGA allocations, specifically Kingston and Central Kitsap. Per the RGS alternatives, Unincorporated UGAs (urban areas with no HCT terminals or not incorporated or specifically planned as such) are not to be a focus of future growth with reduced allocations to match. While Kitsap objects to these arbitrary criterion as discussed above, these allocations may create significant issues for Kitsap's current and future Countywide Planning Policy allocations and the current size and configuration of the UGAs themselves.</p> <p>The PSRC targets for Kitsap's Unincorporated UGAs must accommodate the Poulsbo, Bremerton and Port Orchard associated UGAs but also the unassociated UGAs of Kingston and Central Kitsap. Kingston has a commuter service to Edmonds and passenger-only ferry service to downtown Seattle. Central Kitsap has multiple planned Bus Rapid Transit facilities in its core. Kingston and Central Kitsap will be affected by substantial growth pressures created by these HCT facilities and the grossly-limited targets will impact our ability to adequately plan for this growth. Without adequate future land or density, the benefits of these substantial HCT investments will be minimized if not negated.</p> <p>It may also require the reduction of current UGA boundaries in one or more of these areas. Reductions in UGAs, which Kitsap already undertook in 2012, leads to wasted infrastructure investments for counties and special purpose districts, leaves urban developments in rural areas and generates conflict and uncertainty in future land use. Such reductions based solely on aggressive academic targets is grossly unreasonable.</p> <p>As the lack of a local policy regarding the GMA-directed future of the Kingston and Central Kitsap UGAs is all that is lacking to allow an HCT Community designation for both, Kitsap County will pursue amendments to its Comprehensive Plan in 2019 to meet this requirement. These would provide some specificity about future annexation or incorporation in these communities. How this may affect VISION 2050's allocations to Kitsap will need to be discussed with PSRC staff as it progresses towards a preferred alternative.</p>	<p>The Preferred Growth Alternative has incorporated changes as recommended by Kitsap communities.</p>
Kitsap County	4	<p>DSEIS and its coverage of the forthcoming VISION 2050 plan policy document</p> <p>The DSEIS focused solely on the RGS. While the RGS is a core component of transportation planning and requires substantial rigor in environmental review, the impacts of additions and amendments in the future plan policy document are currently uncalculated.</p> <p>While not yet finalized, the Growth Management Policy Board has proposed and considered several policy amendments with impacts reaching well beyond the RGS. Enhanced goals, policies and actions regarding climate change, social equity, public health and housing affordability will likely be components of the to-be-released plan policy document. These are far-reaching goals with implications to all aspects of planning and service provision. If these are simple aspirational guidance, they may have little direct environmental impact. But, if they are to be applied to local plan certifications by PSRC thus regulatory requirements, their impacts are much larger. How or when will these impacts be assessed?</p> <p>While VISION 2040 and its EIS included some references to each of these expanded initiatives, the DSEIS should cover the impacts of their expansions. If there is no impact beyond those assessed in the original EIS, how valuable will their inclusion be towards progress?</p>	<p>As stated in Chapter 6 of the Draft SEIS, the multicounty planning policies describe how to address the impacts of the Regional Growth Strategy. Additional analysis of the multicounty planning policies is included in the Final SEIS.</p>

Commenter	Comment Number	Comment Text	Response
Kitsap County	5	<p>DSEIS does not explicitly allow flexibility for local circumstances in county planning.</p> <p>While consistency is encouraged across member jurisdictions, a one-size-fits-all alternative may not fully consider local circumstances (a core element of the Growth Management Act). The geography, topography, development patterns, and transportation systems vary across jurisdictions, and new or revised growth targets or other data and metrics must reflect these features.</p> <p>The PSRC member counties maintain a strong connection to the Seattle metropolitan area, though it cannot be the sole focus of the region. Each county creates housing, transportation, and employment "micro-climates" based on regional trends as well as unique qualities of the jurisdiction. Kitsap County is quite different from greater King County in terms of size, geology, population, and relationship to Puget Sound, for example. Our separation from the 1-5 corridor, peninsular nature, substantial shorelines, rolling topography, and dependence on ferry transportation make certain development intensities, employment opportunities and light rail options less feasible.</p> <p>To ensure consistency with GMA and its "bottoms up" approach to planning, VISION must include explicit allowances for flexibility where appropriate.</p>	<p>VISION 2050 provides flexibility in several ways. Target setting occurs at the countywide level, which provides the opportunity to consider the unique circumstances of each jurisdiction. Regional Growth Strategy allocations vary by county and were developed with the input of each county. The draft plan incorporates changes to the Regional Growth Strategy as recommended by Kitsap communities.</p>
Kitsap County	6	<p>Military installations must be adequately considered in the VISION update</p> <p>Kitsap, Pierce and Snohomish Counties have sizable military installations that impact their growth patterns. These installations have billion-dollar implications to the regional economy and their activities have impacts on key transportation corridors. While we understand the federal government is independent from our regional plans and cannot be directed growth, a failure to acknowledge these large-scale employment and housing facilities in projections and planning discussions does a disservice to the counties in which they are located. As has been promoted in various discussions including the Regional Centers Framework and verbally supported by PSRC, these facilities must be considered commensurately to regional centers in VISION to address their similar impacts.</p> <p>It is uncertain how these military installations are fully considered by the VISION DSEIS, its target setting and alternatives analysis.</p> <p>Thank you again for the opportunity to provide comment on the VISION 2050 DSEIS. If you have any questions or need additional information, please contact us at (360) 337-7080 or Eric Baker, Policy Manager, at (360) 337-4495 or <a href="mailto:ebaker@co.kitsap.wa.us">ebaker@co.kitsap.wa.us</a>.</p> <p>Sincerely, Edward E. Wolfe, Chair</p>	<p>Based on feedback from the Regional Centers Framework project, major military installations are a new regional geography in VISION 2050. Growth targets cannot be assigned to major military installations as you acknowledge. This regional geography is designed to promote coordination between the military installation, countywide planning efforts, and neighboring jurisdictions to plan for growth, address regional impacts, and enhance multimodal transportation options.</p>
Pierce County	1	<p>Dear Mr. Brown:</p> <p>Vision 2050 has the potential to be an effective regional growth planning document that would provide meaningful guidance to the counties and cities in the Puget Sound Region. The focus of the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050 is on the Regional Growth Strategy (RGS) - the desired growth pattern within the 4-county region. At the local level, the RGS serves as guidance for the establishment of 20-year population and housing targets. These targets are incorporated into individual jurisdictions' comprehensive plans. These local targets serve as the basis for growth assumptions and identifying needed capital facility improvements to support existing and future growth. With the relationship between the RGS and local planning, this desired growth pattern must balance the larger regional objectives with one which can be reasonably achieved by all jurisdictions. While we recognize the benefits and support the desire for a growth pattern that emphasizes compact development in support of transit centers and corridors, we cannot ignore the real-world circumstances and the outside forces that cannot be controlled through local policy. This thinking provides the basis for our review of the DSEIS and resulting comments.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS.</p>
Pierce County	2	<p>Identifying a Realistic Growth Alternative</p> <p>We can support a preferred alternative which recognizes realistic growth expectations in unincorporated Pierce County, within both the urban and rural areas. We cannot ignore the fact that the County's urban growth area (UGA) has been in place since 1995. Public and private investments have been made premised on continued growth within this area. The County is not going to entertain actions, i.e. down-zoning, that will significantly reduce the ability of these public and private investments being realized. Similarly, the County cannot ignore the significant number of vested projects within the UGA. The lots associated with these projects, which are outside the Tacoma Potential Annexation Area (PAA), total more than the estimated total housing units associated with two of the alternatives (Stay the Course and Transit Focused Growth).</p> <p>In developing a preferred alternative, the DSEIS also must recognize that counties have limited tools in suppressing growth in the rural area. The DSEIS provides no information or analysis regarding how growth in rural areas would subside to levels consistent with the alternatives. While focusing the primary growth into urban areas is important, the preferred alternative must recognize growth that is likely to occur in rural areas, especially given the number of lots that already exist. Even if a county further down-zoned properties, the number of existing vacant lots will continue to support growth that meets the needs of the market.</p>	<p>Comments acknowledged. The SEIS Land Use section contains mitigation measures for reducing rural development pressure.</p>
Pierce County	3	<p>Components of Stay the Course and Transit Focused Growth alternatives appear to be aspirational and may not be realistically achieved throughout the region. To achieve the RGS targets, some jurisdictions and "Geographies" within Pierce County will need to grow housing units at three times the level they have experienced at their highest level in the past 10 years. Other jurisdictions will have to take actions that would significantly restrict growth. Planning for growth at levels that is unlikely to occur will have serious environmental, transportation, public facility and utility impacts. As an example, school districts rely on local comprehensive plans to plan for school facilities. Adopting aspirational, rather than achievable growth targets, would have serious impacts.</p>	<p>Comment noted.</p>
Pierce County	4	<p>Pierce County has requested PSRC to complete a GAP analysis showing how much historical development trends must shift to achieve the RGS for growth in population and employment. Absent this analysis and the inclusion of multicounty planning policies in the DSEIS, it must be made clear to decisionmakers what must occur for the growth allocations to be realized. As an example, while two alternatives indicate a shift in the jobs-housing balance, the DSEIS does not indicate how it would be accomplished. The need to have more employment in the South Sound is critically important. Moving toward that goal needs to be more than a paper exercise. We need to work together to identify what steps can be taken to make a more equitable distribution of jobs a reality. This is a complex issue that revolves around such issues as wages and housing prices at the sub-regional level, i.e. can a person afford to live where they work. In the past, some jurisdictions have commented that the allocations are about "planning" for growth; the environmental analysis is premised on achieving the RGS.</p>	<p>Although PSRC cannot force employers to locate jobs in specific places, VISION 2050 and the preferred growth strategy support the distribution of employment growth across the region in several ways. It shifts the allocation of employment growth from King County to the other counties by 5%. VISION 2050 contains policies to support shared widespread prosperity, living wage jobs, and the planning and conditions that help to create those opportunities. VISION 2050 also contains regional actions to provide support for local</p>

Commenter	Comment Number	Comment Text	Response
			economic development planning efforts. The SEIS analyzes the impacts of the plan alternatives.
Pierce County	5	<p>When developing the preferred alternative, the County recommends combining certain unincorporated urban areas within other Geographies. While the Tacoma PAA is within the High Transit Capacity (HTC) Communities Geography because of a Bus Rapid Transit (BRT) route, it is logical to include other unincorporated PAAs and Potential Incorporation Areas (PIA) under the "Core" or "Cities and Towns" Geography because these areas are planned to be annexed or become an incorporated area. As an example, the unincorporated area associated with the Bonney Lake PAA should be classified under the "Cities and Towns" Geography.</p> <p>The DSEIS also needs to recognize that the Stay the Course and Transit Focused Growth alternatives guide some jurisdictions in a manner that contradicts elements of the Growth Management Act (GMA). These two alternatives are premised on restricting growth within the designated urban growth areas (within cities/towns and unincorporated areas). The housing options associated with these alternatives are focused on higher density. GMA requires jurisdictions to provide housing types meeting the needs of all income levels.</p>	Comment acknowledged. The alternatives are all designed to be consistent with the Growth Management Act and do not prevent areas within the urban growth area from being zoned for urban densities or for strategies to meet housing needs at a range of income levels.
Pierce County	6	Pierce County requests a preferred alternative with growth allocations between the Transit Focused Growth and Urban Growth Reset alternatives. The population growth under the Unincorporated Urban Pierce County Geography should be lower than the Urban Growth Reset, using housing capacity information from the 2014 Pierce County Buildable Lands Report as an initial cap. Our rough estimate would be a population growth of approximately 80,000 people over the 33-year planning period. To be realistic, the rural area's population growth over this planning period should be closer to 30,000. This is premised on an annual housing growth of 325 units and a person per household (pphh) of 2.75. The above projections reflect a decrease in annual housing growth and pphh, as compared to historical trends.	The county's preference for a hybrid alternative has been acknowledged. Allocation recommendations have helped to shape the Preferred Growth Alternative, and the final version of the Preferred Growth Alternative was crafted with input from Pierce County.
Pierce County	7	<p>Guidance through the Regional Growth Strategy</p> <p>We emphasize that, regardless of which "preferred" RGS alternative is chosen, it is guidance and not a mandate. PSRC staff has repeatedly stated in various forums that Vision 2050 is intended to provide guidance and will be flexible. When asked for clarification, the remarks refer to flexibility associated with allocating growth to jurisdictions within the specific Geographies. However, there are various Geographies in which there is only one jurisdiction. We ask that PSRC to provide clarity regarding what "consistency with Vision" means. If Vision is flexible as staff has suggested in the past, then the RGS and updated Multicounty Planning Policies (MPPs) can provide more aspirational vision for the future. If the RGS and MPPs are prescriptive and compliance is necessary for Plan certification, then Vision must be more accurate, based on actual growth, and provide actions to ensure the preferred alternative is achieved to the greatest extent possible. It cannot be both ways.</p>	PSRC's review of local plans for consistency is described in the Regional Growth Strategy and Implementation sections of VISION 2050. Flexibility is provided through the use of geography categories and through the use of a 2050 time period that is different from local targets. Actions to achieve the Regional Growth Strategy are described in those sections and throughout the plan.
Pierce County	8	<p>Criterion for Environmental Review</p> <p>In our review of the DSEIS we have made several observations that are important to decisionmakers when formulating a preferred alternative. The County is concerned with the level of analysis and how the results are presented.</p> <ul style="list-style-type: none"> <li>The environmental analysis is completed at a regional level. The impacts at a county sub regional level are not provided. It must be recognized that the regional average may not accurately reflect sub-regional impacts and benefits. Providing regional, average data disguises potentially major disparities among areas; King County is a relative outlier in many areas and likely skews the regional average. Similarly, the DSEIS should provide mitigation at a sub-regional level. It provides local jurisdictions more focused guidance in carrying out planning based on local conditions.</li> <li>Looking closer than the colored arrows on the Summary Comparison of Alternatives Impacts (Table ES-3), a reader is provided numerical information used to determine the impact. It is notable that the difference in percentage is not significant, especially considering a margin of error factor. Yet, the DSEIS conveys that these small differences are significant. An example of this is the "How Much the Average Person Drives" criterion.</li> <li>The way the environmental impacts are presented in Table ES-3 seems to convey that all impacts have equal weight in the selection of the preferred alternative. It is our observation that some of the criteria are not relevant or should not be considered to have the same weight. As an example, the analysis infers that multi-family is preferred over single-family specific to "Visual Quality." This is extremely subjective. Most citizens in Pierce County would argue that high-density multi-family developments are more visually intrusive and impactful. This is frequently voiced at our public meetings and hearings. This criterion should either not be included or should be weighted differently at the sub-regional level.</li> <li>The DSEIS misrepresents the potential environmental impacts associated with the various housing densities. This is a result of lumping a wide range of densities together. As an example, the DSEIS defines low density as less than 12 housing units per acre. This category of density represents development that includes more than the typical single-family development. The characteristics between a 4 unit per acre single-family project is dramatically different than an 11 unit per acre fourplex project. Consequently, the impacts would also be significantly different. The higher levels of low-density housing should not be characterized as a negative impact in Table ES-3.</li> <li>We also contend "Growth in Proximity to UGA Boundary" is not an appropriate criterion. It makes no difference where growth occurs within the designated UGA. This criterion is premised on the notion that more development located near the UGA boundary results in higher pressure to expand it and convert rural and agricultural lands. It also assumes that it leads to higher levels of rural development. This thinking is in error. GMA provides the provisions for UGA expansion. The DSEIS cannot ignore these provisions. It should be recognized that all urban areas will continue to accommodate growth, even if the preferred alternative focuses growth within specific Geographies. Many other factors come into play related to spurring growth in the rural area. The most obvious being the desire to have a rural lifestyle, i.e. further away from neighbors, having space to grow food or have horses, or having a large shop to work on a collection of cars, or other pastimes not well suited to dense neighborhoods.</li> <li>PSRC decided to use Vision 2040 as the baseline to determine if the alternatives have positive or negative impacts. With this decision, the DSEIS is comparing the alternatives against theoretical outcomes of Vision 2040. If one looks at Appendix E and reads the Regional Growth Strategy Background Paper, it is evident that the Vision 2040 growth patterns have not been realized. To determine the impacts of the alternatives over what has occurred since the adoption of Vision 2040, you must look at real baseline data (2014 and 2017) provided in Appendix B-Supporting Data for Analysis. In most cases, all the alternatives show an improvement over the base year. This is important information that is buried in the document and should be more upfront.</li> </ul>	<p>Comments acknowledged. The SEIS analysis is at the regional level and includes several data points at subregional and county levels for additional understanding of the impacts of the regional growth alternatives. Additional environmental analysis occurs at the local level with local comprehensive plans.</p> <p>PSRC's models, as utilized for analyzing the VISION 2050 alternatives, are not currently structured to produce common statistical measures of significance or margins of error. The models have however been tested and validated against real world estimates such that they provide reasonable confidence in the directionality of model results compared between two or more scenarios. A protocol based on evaluating both the absolute and percentage difference between modeled indicators was used to determine whether values are distinct, slightly distinct, or essentially similar.</p> <p>The forecasted travel time between Seattle and Tacoma in 2050 varies by direction and time of day. The 80 minute peak period travel times that are forecasted during the peak hours of the morning and evening commute are for auto only and do not include transit. It should be noted that travel times up to 90 minutes are currently observed in this corridor today, so the forecasted auto travel times by 2050 are a slight improvement over base year conditions. Transit travel times between Tacoma and Seattle in 2050 are forecasted to be approximately 60 minutes via commuter rail and 65 minutes via light rail, faster than the forecasted auto travel times.</p> <p>The analysis for VISION 2050 includes transportation projects implemented through 2040 and the results will help inform the next RTP update. Further transportation metrics will be analyzed and included in the RTP update.</p>

Commenter	Comment Number	Comment Text	Response
		<ul style="list-style-type: none"> <li>• It is unclear as to how the analysis incorporates external regional influences. Many people live and work outside the four counties. While outside the "planning" area, we cannot ignore the interaction with neighboring counties. As an example, the analysis presumes that the regional mean jobs-housing balance is an ideal ratio. The fact that people commute from Thurston, Kittitas, and Skagit counties suggests otherwise.</li> <li>• It is concerning that the average travel time between Seattle and Tacoma is more than 80 minutes in all alternatives. To understand the transportation issues, we request that additional information is provided: <ul style="list-style-type: none"> <li>-What is the percentage of transit versus automobiles between Seattle and Tacoma?</li> <li>-What happens when you take "out" the Sounder riders versus the auto or light rail riders? What are the average times per mode?</li> <li>-What are the travel times between areas south of Tacoma (i.e., JBLM and urban unincorporated Pierce County) and Seattle?</li> <li>-Update Table B-34 to show the Base Year (current) times for the same origins and destinations.</li> </ul> </li> </ul>	
Pierce County	9	<p>Multicounty Planning Policies</p> <p>As the Multicounty Planning Policies are a significant component to Vision 2050, it is unclear why the environmental review does not include them. The DSEIS states the "...Environmental effects of the multicounty planning policies will be included in the Final SEIS." (page ES-20). This statement is confusing. What is the purpose of including the environmental review of the policies at the end of the process when stakeholders do not have the opportunity to review and comment? This lacks in disclosure and transparency through a public process.</p> <p>The DSEIS does not clearly describe the relationship between the RGS and Multicounty Planning Policies. Are the policies mitigation measures? Are they implementation measures? This relationship is important to understand as we are expected to take steps to implement Vision 2050 through Countywide Planning Policies and local plans.</p>	As stated in Chapter 6 of the Draft SEIS, the multicounty planning policies describe how to address the impacts of the Regional Growth Strategy. Additional analysis of the multicounty planning policies is included in the Final SEIS.
Pierce County	10	The Major Military Installations Geography is not analyzed through the DSEIS. We look forward to reviewing draft policies that will recognize the importance of these areas to the Puget Sound Region and how the Region will work towards keeping them as a valuable economic and community asset.	VISION 2050 has been updated to include the new Major Military Installations regional geography. See the Regional Growth Strategy section.
Pierce County	11	<p>Conclusion Pierce County raised many of the comments described above in our March 2018 Scoping letter. We are hopeful that they will be addressed in either the FSEIS or the draft Multicounty Planning Policies. Our requests reflect the necessity to have a realistic growth pattern in Vision 2050. This, in conjunction with focused Multicounty Planning Policies, will provide for a meaningful and implementable coordinated regional growth plan to set the stage for the next 30 years.</p> <p>Thank you for the opportunity to comment on the DSEIS for Vision 2050. We look forward to working with PSRC and other member jurisdictions to formulate a preferred alternative that addresses the issues raised in this letter.</p>	The county's scoping letter was reviewed prior to developing the Draft SEIS.
Snohomish County	1	<p>RE: Snohomish County– Comments on the Draft SEIS for VISION 2050</p> <p>Dear Ms. Harris,</p> <p>Snohomish County appreciates the opportunity to provide feedback on the VISION update process and the Draft Supplemental Environmental Impact Statement (DSEIS). We know that adding 1.8 million more persons and 1.2 million more jobs to the region by 2050 is an immense task and we appreciate PSRC's consistent willingness to consider our comments. We look forward to continuing to work with PSRC and all of our regional partners throughout the completion of VISION 2050 and its implementation within Snohomish County through our countywide planning policies and local comprehensive planning processes.</p> <p>Snohomish County recognizes the large-scale and long-term investment that the new light-rail routes represent. This transit investment together with ongoing investment in bus rapid transit, the ferry system, and expanded aviation capacity, including Snohomish County's new commercial air service at Paine Field, stands to improve the mobility of the region as we grow. For this reason, we feel the transit-focused growth alternative with some adjustments for the population distribution is the preferred option.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The county's preference for the Transit Focused Growth alternative has been acknowledged.
Snohomish County	2	<p>We feel the adjustments are necessary to recognize some market factors and historical lot patterns that are unavoidable as well as to account for the expected timing and phasing of some key transit projects. As you are aware, these adjustments are supported by jurisdictions in Snohomish County as indicated in the comments submitted by Snohomish County Tomorrow in the letter dated April 29, 2019.</p> <p>From the standpoint of the goals of the Growth Management Act (GMA), a 2% growth target, or approximately a maximum of 10,000 people over the next 35 years, for the rural areas may be desirable. However, that number is about what we currently experience during a typical 10-year time span. There is no doubt that limiting population growth in the rural areas would serve to better protect our natural environment and resources. However, county development regulations impose mitigation requirements and environmental protections to limit the impacts of this population growth. Furthermore, based on the historical population growth we have seen in the rural areas and the number of remaining legal, nonconforming lots we believe to be remaining, we do not believe a 2% growth target is realistic. To limit rural growth to just 2% would be a challenge, not just from a market perspective, but also from a zoning perspective. There are far too many existing, legal non-conforming and conforming vacant lots for us to believe that population growth in the rural area will meet this 2% growth target while respecting the rights of property owners. Since Snohomish County does not support changes to rural zoning and regulations that would reduce the number of units already legally buildable in the rural areas, Snohomish County recommends an alternative that closely aligns with the transit-focused alternative but recognizes that the proposed 2% growth assignment for the rural areas is not realistic.</p> <p>We propose allocating a more achievable growth share in rural areas of 6% (25,000 new residents over 35 years), which is still about 4 percentage points less than our current rural growth trends indicate. Additionally, with a reduction in rural population growth, we feel it is important to be clear on the goals and policies intended in the discussion regarding development in proximity to the UGA boundary. Adjusting the rural growth to 6%, which is closer to but still lower than historical development patterns, is possible while keeping growth targets elsewhere consistent with the transit-focused growth alternative.</p>	Allocation recommendations were considered in the development of the Preferred Growth Alternative. After considering the environmental impacts of the alternatives, Draft SEIS public comments, and plan objectives, the Growth Management Policy Board recommended a preferred growth alternative with a 3% Rural allocation and 4% Urban Unincorporated allocation for population growth in Snohomish County.

Commenter	Comment Number	Comment Text	Response
		<p>Similarly, it would be a challenge to limit population growth in the unincorporated urban geography to just 3% (12,000 new residents) over the next 35 years, given that some of these areas represent sizeable development potential with existing or planned high capacity transit service. The suggested adjustment would be to make the allocation more realistic by increasing the population growth assignment to 18,000 (4%) for these areas.</p> <p>We have attached a chart to this letter to provide an example of how changing the rural growth and unincorporated urban population allocations would have a minimal impact on the overall population distribution.</p> <p>Additionally, in 2018 Snohomish County commissioned a Southwest Urban Growth Area (SWUGA) Boundary Planning Study. The study is analyzing existing conditions, opportunities and constraints that will inform future local planning decisions. The County requests that VISION 2050 allow for UGA boundary flexibility for changing population distribution, taking into consideration logical service and natural boundaries.</p>	
Snohomish County	3	<p><b>Employment Growth Distribution</b></p> <p>Snohomish County has concerns with the proposed alternatives continuing to maintain a regional imbalance in jobs and housing. While the reset and transit-focused alternatives project a modest improvement in the balance compared to stay-the-course alternative, a 30-year plan should recognize that our regional long-term resiliency will be better served with a more sustainable balance of living-wage jobs and housing. This goes beyond a balance between the counties, as these alternatives show a decreased share of jobs allocated to outlying cities and towns compared to the existing VISION 2040. Many of these residents commute outside their communities for their livelihoods. Regional commute patterns and transportation infrastructure would benefit from residents having improved access to jobs. Our investments in light rail are not one-way; i.e. they not only go into the Seattle core, but radiate outwards and open opportunities for job growth outside the core in closer proximity to Snohomish County residents. In Snohomish County, an upward adjustment to future employment growth may be justified by recent events not studied in the DSEIS that would potentially facilitate greater interest in employers choosing sites in the Paine Field area (in response to the recent arrival of commercial airline service) and Arlington-Marysville area (in response to an anticipated designation of this area by PSRC as a regional Manufacturing/Industrial Center).</p>	Although PSRC cannot force employers to locate jobs in specific places, VISION 2050 and the preferred growth strategy support the distribution of employment growth across the region in several ways. It shifts the allocation of employment growth from King County to the other counties by 5%. VISION 2050 contains policies to support shared widespread prosperity, living wage jobs, and the planning and conditions that help to create those opportunities. VISION 2050 also contains regional actions to provide support for local economic development planning efforts.
Snohomish County	4	<p><b>Housing</b></p> <p>Affordable housing has become a serious issue in the region. For that reason, we find it incompatible with the housing needs of the region that moderate-density housing (the most affordable housing option according to the DSEIS) is planned to be the smallest portion of new housing units in each of the alternatives. Moderate density housing is important as a source of more affordable, market-rate housing units to accommodate growth within UGAs. A preferred growth alternative focused around high-capacity transit should still allow jurisdictions to encourage more moderate density housing production, compared to what was modeled in the DSEIS. High-density and low-density housing tend to be the least affordable, a fact that the DSEIS acknowledges, and for that reason we should be vigilant that planning for these two housing densities to be the most prevalent does not exacerbate the region's affordable housing challenges. VISION 2050 should also recognize that market factors and consumer choice are primary drivers of population distribution. While the County's recommended VISION 2050 regional growth strategy relies on a transit focused growth alternative, local flexibility and authority must be maintained in order to respond to and anticipate actual growth patterns.</p>	The model relies on current zoning. If more land was zoned for moderate-density housing, the model would reflect the building of more moderate-density housing.
Snohomish County	5	<p><b>Transportation</b></p> <p>VISION 2050 should continue and improve on VISION 2040's previous efforts to coordinate land use and transportation planning, including provision of the infrastructure necessary to realize this vision. VISION 2050 should lay the groundwork for an increased collaboration between WSDOT and the region to meet these needs and support the regional growth strategy. The Growth Management Act requires that local governments plan for transportation improvements that can adequately address the impact of the growth in their jurisdictions. But localities can only be successful if the state has also done adequate planning since in many places the state transportation network serves as the backbone of the local system. As Vision 2050 is being developed, a multicounty planning policy (MPP) should be included that encourages WSDOT to plan and prioritize funding for projects in a way that clearly shows how the state system, particularly the non-freeway portion of the system, will be able to support the regional growth strategy.</p> <p>By 2050, the region will have made an unprecedented investment in high capacity transit, but without the necessary infrastructure to provide access to light rail and support bus rapid transit, this investment will not achieve its desired ends. PSRC should work closely with WSDOT's Office of Urban Mobility and Access to clearly show how the state transportation system will work in a comprehensive way with the region's high capacity transit system.</p>	PSRC coordinates with WSDOT on a regular basis, and the VISION 2050 Regional Collaboration and Transportation policies support further coordination. The Regional Transportation Plan update will provide an additional opportunity to address these issues.
Snohomish County	6	<p>The implications of the information in the 'Summary Comparison of Alternatives to Stay the Course' table (Table ES-1) could be made more apparent by discussing the impacts separately for each of the four counties. An explanation should be included as to why the impacts to the transportation system are so similar for each of the alternatives. Growth patterns have differing impacts on cost of providing infrastructure. PSRC should go further in the DSEIS by conducting a high-level analysis of expected transportation infrastructure costs associated with each alternative. The transportation impacts under some of the alternatives seem much lower than would be expected, especially for Snohomish County. Employment distribution is almost identical under each scenario, yet there is significantly more population growth in the outlying and rural areas for some alternatives. This should result in many more people having to commute further distances to work and the transit system being much less efficient and therefore system costs higher. However, the transportation analysis shows similar impacts. Transit ridership is only estimated to improve by 2% under the "Transit Focused Growth" RGS compared to the "Reset Urban Growth" RGS, which does not seem to reflect the major differences in the population distribution.</p>	The Draft SEIS includes an analysis of growth alternatives that use common assumptions of transportation improvements based on the adopted Regional Transportation Plan. Therefore, the differences between alternatives are in terms of performance, not cost. Note that a small percentage difference in some measures may still be significant.
Snohomish County	7	<p><b>Air, Water, and Ecosystems</b></p> <p>We are pleased to see that VISION 2050 maintains a strong commitment to preserving and enhancing the natural beauty of the region. While the DSEIS has them as separate sections, it is critical to be clear that air and water are inherently parts of the ecosystems. The DSEIS also needs to be clear on what will affect plants, animals, or both. For instance Section 2.7.4 is unclear whether "species" is referring to plants or animals.</p>	Section 2.7.4 refers to both plant and animal species. Clarification has been added to the SEIS.

Commenter	Comment Number	Comment Text	Response
Snohomish County	8	While we recommend the transit-focused alternative, we would like to acknowledge the fact that there are benefits in the "Reset" alternative as described in the DSEIS. For instance, section 4.6.1.2 states that older areas will see a higher level of redevelopment that will result in areas of existing impervious surface being brought up to current NPDES standards. This type of redevelopment should be encouraged when it can be done without diminishing a transit-focused development pattern. If reasonable measures are considered to enable appropriately phased growth with the development of transit corridors, these measures should find ways to capture positive environmental benefits of redevelopment such as the ones identified under the reset alternative.	A new policy in the Environment section of VISION 2050 promotes the retrofit of existing stormwater systems.
Snohomish County	9	Public Services and Utilities We applaud that the DSEIS maintains a tone of encouraging coordination with all service providers – school districts, fire districts, utility purveyors, etc. We hope that the revised multicounty planning policies will also recognize the importance of coordination. Utilities and services should accompany growth versus guide growth; coordination is the optimal path to being proactive with service providers. If the transit-focused alternative is selected as the preferred alternative, the DSEIS should note that there will still be costs associated with upgrading and improving existing systems and service buildings, such as schools, in order to support the planned level of infill development and redevelopment. These costs may be more or less when compared to the cost of system expansions under the other alternatives, but are a factor to consider either way.	VISION 2050 has been updated to further support coordination for public services. See the Public Services section. The SEIS discusses public service upgrades and expansions needed to support infill development.
Snohomish County	10	In closing, planning for growth at a regional level as PSRC does is a challenging task and the staff of PSRC should be proud of the work they have accomplished. I hope our comments are helpful as the DSEIS is finalized and a preferred alternative selected. With a large number of significant transit systems coming into use, the transit-focused alternative should be the preferred alternative that comes from this DSEIS with the adjustments proposed within this letter and with the support of Snohomish County Tomorrow. The issues this letter raises are meant to ensure the impacts of the growth alternatives are thoroughly assessed and the alternative selected is responsive to the facts of reality.  Thank you for the opportunity to comment in advance of determining a preferred alternative for VISION 2050. Please feel free to reach out to us with any questions or desired follow-up discussion on any of the comments found in this letter.	Comment noted.
Tacoma-Pierce County Health Department	1	April 22, 2019 VISION 2050 Draft SEIS Comments Puget Sound Regional Council (PSRC) 1011 Western Avenue, Suite 500 Seattle, WA 98104 Dear PSRC Board members and staff: Tacoma-Pierce County Health Department currently supports the Transit Focused Growth alternative. The Vision 2050 Draft Supplemental Environmental Impact Statement shows the Transit Focused Growth alternative has the greatest potential to benefit health, social equity and climate, of the three alternatives shared so far.	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The department's preference for the Transit Focused Growth alternative has been acknowledged.
Tacoma-Pierce County Health Department	2	Any regional growth alternative PSRC selects should: Strengthen policies and investments to mitigate displacement. Set realistic and achievable goals and targets, which consider existing vested development rights.	VISION 2050 has been updated to include additional consideration of displacement. See the Regional Collaboration, Development Patterns, Housing, Economy sections of VISION 2050 for Multicounty Planning Policies related to displacement. The Preferred Growth Alternative was developed with information from counties that considered vested development rights.
Tacoma-Pierce County Health Department	3	Encourage more meaningful public participation, transparency and accountability.	VISION 2050 has an action in the Regional Collaboration section that directs PSRC to develop an outreach program for VISION 2050 that is designed to communicate the goals and policies of VISION 2050 to member jurisdictions, regional stakeholders, and the public.
Tacoma-Pierce County Health Department	4	We recommend PSRC work with local agencies, organizations and communities to develop a small set of measures to communicate Vision goals and progress. Communicating about shared progress would help to build support for Vision implementation throughout the region.	A new Regional Collaboration action directs PSRC to track the implementation of VISION 2050 through monitoring and periodic evaluation. The process to develop measures to track will be conducted after VISION 2050 is adopted.
Tacoma-Pierce County Health Department	5	Finally, the Tacoma-Pierce County Board of Health adopted a resolution in 2016 to encourage the use of Health Impact Assessments with SEPA reviews. Our healthy community planning interest group of planners will submit a health and equity assessment of the growth alternatives by April 29. Please consider their proposed mitigation measures, which will apply all alternatives.  Thank you for your leadership improving the health of our communities.  Sincerely, Anthony L-T Chen, MD, MPH Director of Health	Comment noted.

Committer	Comment Number	Comment Text	Response
Tacoma-Pierce County Healthy Community Planning Interest Group	1	<p>INTRODUCTION</p> <p>Tacoma-Pierce County Health Department (TPCHD)'s Healthy Community Planning Interest Group 1 is a professional group comprised of some 40 planners, transportation and health professionals, and academia. It promotes healthy community planning practices and supports healthy communities in Pierce County.</p> <p>The Group prepares this Health and Equity Assessment to augment PSRC's Vision 2050 Draft Supplemental Environmental Impact Statement (DSEIS) (February 2019). The Assessment provides:</p> <ul style="list-style-type: none"> <li>• A summary of environmental impacts of the three regional growth alternatives, both in general and on the following two equity geographies: <ul style="list-style-type: none"> <li>- Low-income communities: Census tracts that are greater than 50% people with low-incomes</li> <li>- Communities of color: Census tracts that are greater than 50% people of color</li> </ul> </li> <li>• Health benefits and adverse impacts; and</li> <li>• Potential mitigation to address health impacts.</li> </ul> <p>Relying on the assumptions and data findings of the DSEIS, the three alternatives assessed are:</p> <ul style="list-style-type: none"> <li>• A1: Stay the Course</li> <li>• A2: Transit Focused Growth</li> <li>• A3: Reset Urban Growth</li> </ul> <hr/> <p>I. POPULATION, EMPLOYMENT, HOUSING</p> <p>General and Equity Geographies Impacts</p> <ul style="list-style-type: none"> <li>• In general, job-housing (J-H) balance improves region-wide. This assumes that the regional average of 1.0 is a "desirable target" to achieve; and that the higher the index, the more pressure for housing.</li> <li>• Based on the regional average of 1.0 as a desirable target, A2 results in a better J-H balance for both types of equity geographies (communities of color and low-income communities). In particular, low-income communities benefit the most, under A2, from such balance improvement.</li> <li>• However, J-H balance improvement can't ensure reduction in commuting. From a two-career family point of view, a ratio of 1.0 potentially implies another member of a traditional household of 2.5 persons would have to commute to work. Consider fine-tuning the targets of J-H balance and persons of household projections based on different geographies.</li> <li>• Commuting will continue to worsen if there's a mismatch between the types of jobs created and the kinds of housing units produced. We should ask "Are the types of dwelling units in mixed use centers, such as in transit-oriented developments (TOD) or transit-oriented corridors (TOC), wage-affordable to those living in proximity to alternative transportation?"</li> <li>• Region-wide, more affordable medium-density housing will be generated under A2, whereas there's a drop in affordable medium-density housing under A3.</li> <li>• As for equity geography impacts under A2, there's a 1% decrease of medium density housing in low-income communities, but a 1% increase in communities of color as compared to A1.</li> <li>• As documented in the PSRC Housing Report, moderate density housing tends to be more affordable as an ownership option, as compared to either low- or high-density housing. All three alternatives result in 80% or more of the future housing stock as either low – or high- density housing, which are the most expensive types of housing. However, neither did the DSEIS nor the Housing Report discuss smaller rental apartment units as an affordable housing option besides moderate density homeownership opportunities.</li> <li>• Under A-2, most of the growth occurs in King County, which has the highest percentage of high-density housing (68%) and the lowest percentage of moderate-density housing (15%).</li> <li>• Most of the moderate density housing to be replaced with higher density housing is currently located in low-income areas and communities of color. The new moderate density housing will be located further away from transit stations, as it will occur in the more suburban communities.</li> <li>• While A-2 results in more housing near transit located in low-income areas and communities of color, the housing will be high density housing, which is less affordable. As a result, the ability for EJ populations living in proximity to transit could be reduced due to increases in housing cost.</li> <li>• Rising housing cost would displace EJ populations into suburban areas, making their access to transit more difficult. This could result in an increase in reliance on vehicles, further aggravating their cost burden.</li> <li>• Overall, both equity geographies see the most improvement in J-H balance under A2. Unless efforts are made to create or mandate affordable "higher density rental" apartments near transit facilities, displacement risks remain high as the moderate density homeownership possibility reduces.</li> </ul> <p>Health Benefits and Impacts</p> <ul style="list-style-type: none"> <li>• Density increase could result in increased environmental noise exposure and the loss of dark sky. This may affect our sleep by disturbing the circadian rhythm; and can cause hypertension and cardiovascular diseases.<sup>2 3</sup></li> <li>• Increasing housing cost can result in an increase in the number of cost-burden households. Cost burden households experience greater food insecurity, more child poverty, and worse health outcomes.<sup>4 5 6</sup></li> <li>• Commuting has a huge impact on both the physical and the mental health. The longer the driving time, the higher the odds for smoking, insufficient physical activity, short sleep, obesity, and the lesser the time for healthy practices, such as walking or meal preparation.<sup>7 8 9 10</sup></li> </ul>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The Housing section of VISION 2050 has been updated to include additional provisions for housing choice and affordability. This includes policies to encourage moderate density housing and other more affordable housing types. New actions have been added to the Housing section to provide additional analysis, tools, and technical support. Health policies have been integrated into VISION 2050, particularly in the Environment, Climate Change, and Development Patterns sections.</p>

Commenter	Comment Number	Comment Text	Response
		<ul style="list-style-type: none"> <li>• Improvements in both J-H balance and J-H match can ease the transportation &amp; housing cost burden, and improve the quality of life and well-being.</li> <li>• J-H balance has the potential to facilitate the development of complete neighborhoods where living wage jobs can be encouraged near affordable housing. Complete neighborhoods support sustainable community health and quality of life.11 12</li> <li>• Housing affects one’s health. There’s a link among home foreclosure, stress and health. Providing affordable housing, particularly in equity geographies, can help improve health and prevent displacement.13 14</li> <li>• Any alternatives that benefit the health of the environmental justice (EJ) or underserved populations can improve the life expectancy of this population segment and reduce health disparities across the region.</li> <li>• Displacing EJ populations could occur under any alternatives. However, it appears to be more likely along high capacity transit. This will further aggravate their health and well-being. Displacement impacts must be mitigated upfront, irrespective of alternative chosen.</li> </ul>	
Tacoma-Pierce County Healthy Community Planning Interest Group	2	<p>Potential Mitigation to Address Health Impacts</p> <ul style="list-style-type: none"> <li>• Use Form-based Codes (FBC) to encourage missing-middle housing.15 At the minimum, consider renaming “single-family” to “detached” housing to allow more than one family sharing a free-standing detached form of dwelling in keeping with the character of traditional neighborhoods. Such built form can easily accommodate a range of missing-middle dwellings, ranging from duplex to quadplex, if designed sensitively.</li> <li>• Strengthen the Affordable Housing tools under the “Planning for the Whole Communities Toolkit” to include such tools as rental housing safety program16, housing financing, tax incentives, land value capture, and continuum of housing (including tiny homes, modular and micro-units, etc.) to meet the needs of all walks of life and foster inter-generational neighborhoods.</li> <li>• Develop incentives and consider inclusionary zoning to attract the development of high-density affordable rental apartment units.</li> <li>• Develop policies to ensure a healthy mix of “affordable” high-density rental and medium-density ownership housing options to meet the needs of the EJ populations and other non-traditional households.</li> <li>• Consider supporting rent control initiatives to keep living costs affordable for lower-income residents.</li> <li>• Displacement risk remains high for all scenarios, particularly A2. Address and prevent displacement upfront through policy intervention and community development/mobilization strategies.</li> <li>• Empower the underserved when developing centers and redeveloping neighborhoods. This can strengthen their voices, give them a sense of ownership and belonging; and create resiliency to manage/cope with displacement.</li> <li>• Explore the use of community development corporations to create affordable housing with local communities.</li> <li>• Monitor J-H match by tracking the Affordable Housing Index (maintained by the Washington Center for Real Estate Research) or housing price points in relation to job wages in walkable neighborhoods along high capacity transits.</li> <li>• Study how density impacts affordability, on both high-density rental and moderate-density homeownership.</li> <li>• Establish affordable housing targets for regional growth centers and areas around transit centers. Targets should be verified during the comprehensive plan certification process.</li> </ul>	See above for updates to VISION 2050. Many of the strategies suggested can be considered for inclusion with new tools developed as part of the Housing actions. Additional provisions for displacement risk have been added to VISION 2050’s Regional Collaboration, Development Patterns, Housing, and Economy sections.
Tacoma-Pierce County Healthy Community Planning Interest Group	3	<p>II. LAND-USE</p> <p>General and Equity Geographies Impacts</p> <ul style="list-style-type: none"> <li>• Region-wide, 75% of population and employment will benefit from walkable access to high-capacity transit under A2, the largest % as compared to other alternatives.</li> <li>• Besides King County, the other three counties will also have an increase in population with access to transit under A2, as compared to other alternatives. This alternative seems to be more regionally/ geographically equitable.</li> <li>• A2 anticipates the most land-intensive/dense growth, thus removing the pressure for sprawling into rural and natural resource lands.</li> <li>• A2 encourages TODs which makes neighborhoods more compact, walkable and complete.</li> <li>• If affordable housing is provided near transit stations, this would address displacement and reduce the transportation and housing cost burden for EJ populations living in proximity to transit facilities.</li> <li>• Developments in urban vs. outlying rural areas bring different visual impacts. A2 would reduce negative visual impact on rural areas, but will change the urban landscape.</li> </ul> <p>Health Benefits and Impacts</p> <ul style="list-style-type: none"> <li>• In general, there are less diabetes, and cardiovascular and respiratory diseases associated with compact cities.17</li> <li>• However, loss of tree canopy as the result of development may create urban health island effect affecting health.18</li> <li>• Walking and biking is the most affordable and readily accessible means to achieve physical activity guideline established by the Surgeon General (30-45 minutes of brisk physical activity per day).19 20 21</li> <li>• The greater the number of people walking or riding transit, the better the overall population health, both physically and socially.22</li> <li>• Transit-oriented, complete neighborhood design is the foundation for health.</li> <li>• Reducing urban sprawl can address climate change and improve environmental health (less pollution).23 24</li> <li>• Reducing transportation cost/time burden can increase one’s disposable income and fuel economic growth, besides improving health.</li> </ul>	Comments acknowledged.

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Tacoma-Pierce County Healthy Community Planning Interest Group	4	<p>Potential Mitigation to Address Health Impacts</p> <ul style="list-style-type: none"> <li>• Rather than promoting design standards, encourage the use of form-based code (FBC)<sup>25</sup> to foster predictable built results and a high-quality public realm. FBC can improve pedestrian experience in compact urban environments, and promote walkability and social interaction.</li> <li>• Explore the use of performance zoning<sup>26</sup> to regulate compatible site standards and intensity and impacts of activities. Performance zoning can be used to incentivize retail services that promote health.<sup>27</sup></li> <li>• Engage local residents and businesses in developing FBCs to encourage public space and streetscape that meet the needs of the current residents. (Engaging local communities early can mitigate displacement impacts).</li> <li>• Infuse local arts and culture into neighborhood design to enhance a sense of identity and community.</li> <li>• Encourage complete neighborhood design around high-capacity transit stations.</li> </ul>	VISION 2050's Development Patterns section contains policies that promote health and well-being. A new action has been added to develop tools to support equitable development in high-capacity transit station areas. Specific suggestions could be considered for these tools.
Tacoma-Pierce County Healthy Community Planning Interest Group	5	<p>III. TRANSPORTATION</p> <p>General and Equity Geographies Impacts</p> <ul style="list-style-type: none"> <li>• A2 can reduce the time and distance traveled the most, and the number of hours stuck in traffic per person, as compared to other two alternatives.</li> <li>• Regionally speaking, three counties, except Kitsap, will benefit more from A2.</li> <li>• Under A2, both the communities of color and low-income communities will experience the largest percentage of population and employment growth close to high-capacity transit.</li> <li>• A2 attracts more jobs close to transit, allowing the EJ populations lacking car-ownership to access jobs more easily.</li> <li>• A2 increases the use and ridership of transit. Under this alternative, both types of equity geographies benefit most by shorter trip distances and times, the availability of more affordable modes of travel, and jobs and amenities within proximity to housing.</li> <li>• Compact and high-density development in proximity to transit makes transit financially more feasible.</li> </ul> <p>Health Benefits and Impacts</p> <ul style="list-style-type: none"> <li>• Reduction in time stuck in traffic can give one more leisure time to be more physically-active and enjoy social life.</li> <li>• Less reliance on cars can possibly reduce traffic accidents, injuries and deaths.</li> <li>• The reduction in vehicle miles traveled can reduce greenhouse gas emissions. This not only improves environmental health, but also human health (obesity, hypertension and diabetes). Increased opportunities for walking and biking can promote both physical activity and social interaction.<sup>28</sup></li> <li>• There's a disproportionate burden of air pollution exposures on EJ populations.<sup>29 30</sup></li> <li>• Poverty, or financial instability, is one of the root causes of poor health. Offering alternative transportation to jobs would give EJ populations an affordable means to get to work and become more financially stable. <sup>31 32 33</sup></li> <li>• EJ populations could experience an elevated risk of displacement due to higher demand for housing near transit facilities. Displacement causing stress affects their health.</li> </ul>	Comments acknowledged.
Tacoma-Pierce County Healthy Community Planning Interest Group	6	<p>Potential Mitigation to Address Health Impacts</p> <ul style="list-style-type: none"> <li>• Work with Pierce Transit to connect rural communities with public transit.</li> <li>• Creatively provide other modes of transportation, such as transit feeder service, to major high-capacity transit stations.</li> <li>• Continue pursuing ferry services between Tacoma and Seattle.</li> <li>• Ensure concurrency of all modes of transportation, including parking reduction in high density areas, when development occurs.</li> <li>• Assess the impacts of autonomous cars on the preferred growth scenario and the equity geographies; and consider ideas contained in Planning for Autonomous Mobility (APA 2018)<sup>34</sup>.</li> <li>• Explore land value capture tools to help fund high capacity transit, infrastructure, public amenities/services and affordable housing.</li> <li>• Explore developing affordable housing at or near high capacity transit stations to capture improved land value.</li> <li>• Develop strategies in collaboration with local communities to implement "target zero" policies.</li> <li>• Mitigate transportation and displacement impacts to promote health (see displacement mitigation measures above).</li> <li>• Promote biking and walking among people of color or certain cultural groups.</li> <li>• Implement active transportation infrastructure, including the Regional Bicycle Network to connect on-and off-road facilities.</li> <li>• Prioritize funding to improve active transportation facilities in low-income areas and areas with higher percentage of special needs populations.</li> </ul>	The SEIS Transportation mitigation measures have been updated to include some of these suggestions. Many of these strategies are also supported by VISION 2050 policies and information in other PSRC plans.

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Tacoma-Pierce County Healthy Community Planning Interest Group	7	<p>IV. THE NATURAL ENVIRONMENT (AIR QUALITY, ECOSYSTEM, WATER &amp; EARTH) AND CLIMATE CHANGE</p> <p>General and Equity Geographies Impacts</p> <ul style="list-style-type: none"> <li>In terms of air quality, A2 would have the lowest greenhouse gas emissions, whereas A3 the highest. However, compact development would create heat island effect requiring mitigation.</li> <li>As for the ecosystems, there will be a reduction in habitat quality and quantity and vegetation cover due to growth in the region. Adverse impacts would be higher if development occurs in less developed areas, such as towns, urban unincorporated areas and rural areas. From this angle, A2, which focuses development in existing urban areas, would better protect the ecosystem.</li> <li>In terms water quality and hydrology, increasing the amount of impervious areas would increase water pollutant in stormwater and the risk of flooding after heavy rainfall. A2 adds the least new impervious surface to previously undeveloped areas, as compared to other alternatives. However, Pierce County would have the largest % increase of new impervious surface. Redevelopment in areas with outdated stormwater controls could result in potential water quality benefit. A3 would have the greatest redevelopment benefits, whereas A2 the least.</li> <li>At a regional level, there's no discernable environmental health difference among three alternatives on EJ populations. However, according to UW Climate Impact Group (2018) findings<sup>35</sup>, EJ populations may be more vulnerable and have reduced ability to cope with climate impacts.</li> </ul> <p>Health Benefits and Impacts</p> <ul style="list-style-type: none"> <li>Ecosystems, biodiversity, green space, and biophilic design offer numerous quality of life, health and well-being benefits.<sup>36 37 38 39 40 41 42</sup></li> <li>Increased noise, air and light pollution would affect our physical and mental health. EJ populations are the most affected as their incomes are worsened due to pollution impacts. In addition, they are more prone to be affected due to the lack of resources and voices to protect themselves from adverse impacts.<sup>43 44</sup></li> </ul>	Comments acknowledged.
Tacoma-Pierce County Healthy Community Planning Interest Group	8	<p>Potential Mitigation to Address Health Impacts</p> <ul style="list-style-type: none"> <li>Encourage biophilic urban design principles, low-impact development, urban tree canopy and green/cool roofs to mitigate air, water, micro-climate and climate change impacts.</li> <li>Address wildlife and human health impacts of urban light and noise pollution, as the result of increased development.</li> <li>Address rising sea water by prohibiting hazardous industries and essential public services to be located within 500-year flood plain.</li> <li>Provide education and resources to assist EJ populations to address and cope with climate change, site specific contamination, and other health hazards.</li> </ul>	The SEIS mitigation measures have been updated to include some of these suggestions. The VISION 2050 Environment and Climate Change sections have been updated to add new provisions on urban tree canopy, low-impact development, light and noise pollution, and climate impacts and resilience.
Tacoma-Pierce County Healthy Community Planning Interest Group	9	<p>V. PUBLIC SERVICES, UTILITIES AND ENERGY</p> <p>General and Equity Geographies Impacts</p> <ul style="list-style-type: none"> <li>Future growth requires service expansion in areas where growth occurs. Concentrating 75% of population growth under A2 can reduce the chance of expanding services and utilities in rural area or close to natural resource lands.</li> <li>A2 minimizes the pressure for urban sprawling and threats to rural/natural areas.</li> <li>Rather than requiring expansion or development of new infrastructure, compact development in existing service areas can keep utility and living cost down, thus benefiting the EJ populations.</li> </ul> <p>Health Benefits and Impacts</p> <ul style="list-style-type: none"> <li>Focusing service improvements within UGAs and along transit facilities without sprawling into rural and natural lands can better preserve the ecosystem. A healthy ecosystem supports environmental health, and improves our physical and mental health.<sup>45</sup></li> <li>Keeping cost of living down benefits not just the low-income communities, but also the entire region, without sacrificing the overall quality of life.</li> </ul> <p>Potential Mitigation to Address Health Impacts</p> <ul style="list-style-type: none"> <li>Direct infrastructure investments in equity geographies and underserved areas to address health disparities.</li> <li>Consider the burden of urban sprawl on people, planet and prosperity when making infrastructure investment decisions.</li> <li>Co-locate essential public services around transit facilities.</li> <li>Encourage infill and missing-middle developments within UGAs where infrastructure capacity can support additional development.</li> <li>Prioritize improving existing infrastructure where capacity exists for infill development.</li> </ul>	The SEIS Public Services mitigation measures have been updated to include some of these suggestions. Many of these strategies are also supported by VISION 2050 policies and information in other PSRC plans.
Tacoma-Pierce County Healthy Community Planning Interest Group	10	<p>VI. PARKS AND RECREATION</p> <p>General and Equity Geographies Impacts</p> <ul style="list-style-type: none"> <li>Under A2, King, Pierce and Kitsap Counties will have more urban population growth near parks.</li> <li>Under A2, access to local parks resources would improve in low-income communities (64%) as compared to A1 (62%), and in communities of color (61%) as compared to A1 (60%).</li> <li>Although under A3, low-income communities may see the largest increase in UGA population near local parks (66%), other health impacts may outweigh this local urban park access benefit.</li> <li>Access to regional parks resources among EJ populations would remain difficult across all alternatives. They lack car ownership, disposable income to access park pass and leisure time.</li> </ul>	The SEIS Parks and Recreation mitigation measures have been updated to include some of these suggestions. See response above on health provisions in VISION 2050.

Commenter	Comment Number	Comment Text	Response
		<p>Health Benefits and Impacts</p> <ul style="list-style-type: none"> <li>• Parks and open space provide numerous physical, social, emotional and mental health benefits.46</li> <li>• Walkable access to urban green/open space, playground facilities, community gardens and trails can promote health and well-being.47 48</li> <li>• Biophilic city/urban design provides healing spaces for urban dwellers, particularly living in dense built environments.49</li> <li>• Access to nature benefits physical, social, emotional and mental health.50</li> </ul> <p>Potential Mitigation to Address Health Impacts</p> <ul style="list-style-type: none"> <li>• Encourage “green streets” as places or linear parks for recreational and utilitarian purposes. Adopt form-based codes to create connected open spaces along streets to form urban linear parks for physical activity and social interaction.</li> <li>• Create incentives to encourage public-private partnerships in creating connected open spaces for all ages and abilities.</li> <li>• Provide urban parks, trails, play facilities, community gardens and open space in compact TODs to compensate for the loss of backyard space normally found in low-density areas.</li> <li>• Provide urban parks as “breathing spaces” in concrete, high-density built environments.</li> <li>• Encourage Transfer of Density Rights provisions to create public open space and preserve historic/cultural assets within urban settings to serve the needs of compact neighborhoods.</li> <li>• Improve on-street and off-street trail connectivity to promote physical activity.</li> <li>• Encourage green/cool roofs to mitigate the loss of backyards in compact developments for health and environmental reasons.</li> <li>• As population grows and compact development trends, simply adopting a service radius level of service (LOS) for urban parks is not sufficient. Work with local jurisdictions and park agencies to develop per capita LOS for urban parks. This will help determine future parks levy, cash-in-lieu rates, and private open space dedication requirements in support of high-density living.</li> <li>• Identify open space and recreation needs with the EJ populations to design “culturally-appropriate and affordable” parks and recreation programs. Consider scholarships and collaborate with health professionals to prescribe Park Rx to foster the use of parks and recreation services among the underserved.</li> <li>• Empower the underserved in parks planning and design to help strengthen a sense of ownership and create resiliency to manage/cope with displacement.</li> <li>• Encourage transit to serve major regional and natural open space, such as the Foothills Trails, NW Trek and Point Defiance, from major cities and towns throughout the County.</li> <li>• Encourage local jurisdictions to develop natural parks, like Swan Creek Park, within or close to UGAs so that those without access to cars can still enjoy the natural environment close to home.</li> </ul>	
Tacoma-Pierce County Healthy Community Planning Interest Group	11	<p>CONCLUDING REMARKS</p> <p>Vision 2050 needs a strong, over-arching vision statement painting a bright future of our region. A shared vision yielding the 13 desired outcomes can help guide the assessment and selection of growth alternatives.</p> <p>The Healthy Community Planning Interest Group recommends the following vision statement for PSRC to consider. This statement attempts to capture the triple bottom line of sustainable development as the foundation for a healthy region: “A sustainable region with ample fair opportunities to foster healthy people and communities, a vibrant economy and a livable environment”. Measurable outcomes should be developed with the community to track the region’s progress towards the shared vision.</p> <p>To conclude, the Group strongly feels that the three intertwining factors--housing (affordable or unaffordable), land use (land-intensive or land-extensive) and transportation (transit-oriented or auto-dependent)—directly affect the health of our people, economy and environment. Commuting tremendously costs our economy, the environment, and particularly people’s health and social well-being.</p> <p>To achieve the proposed vision for the Vision, the Group recommends a few key success ingredients:</p> <ul style="list-style-type: none"> <li>• Build compact and complete neighborhoods with affordable housing around transit facilities.</li> <li>• Strive to make housing “wage” affordable to those making a living nearby.51</li> <li>• Make transit accessible to everyone, particularly the EJ and special needs populations, and those living in the fringe of UGAs.</li> <li>• Address involuntary displacement upfront through rigorous policies on housing, job-housing match and community engagement; and action strategies to organize and empower local communities to be more resilient.</li> <li>• Consider health and equity impacts in all planning decisions.</li> </ul>	A new, more succinct, vision statement has been added to the introduction of VISION 2050. It contains many of the elements suggested for a vision statement. New provisions to address the housing, land use, economic, equity, and transportation issues raised have been added to VISION 2050.
Tacoma-Pierce County Healthy Community Planning Interest Group	12	<p>The Group encourages PSRC to be more accountable by:</p> <ul style="list-style-type: none"> <li>• Considering the health benefits and adverse impacts outlined in this report when deciding on a preferred or any hybrid alternative.</li> <li>• Incorporating potential mitigation measures recommended in this Assessment when updating the Multicounty Planning Policies (MPPs).</li> <li>• Adopt a “health-in-all-policies” approach in updating the MPPs.</li> </ul> <p>Adverse health impacts must be mitigated in order to create a sustainable, healthy and equitable region. The Group looks forward to reviewing the Multicounty Planning Policies in the coming months.</p>	Many of these considerations were used when updating VISION’s multicounty planning policies. See the Development Patterns section.

Commenter	Comment Number	Comment Text	Response
U.S. Environmental Protection Agency	1	<p>Dear Ms. Harris:</p> <p>The U.S. Environmental Protection Agency has reviewed the VISION 2050 Draft Supplemental Environmental Impact Statement, which was produced in accordance with the Washington State Environmental Policy Act. VISION 2050 updates VISION 2040, the central Puget Sound region's long range growth management, environmental, economic, and transportation strategy.</p> <p>The VISION 2050 Draft SEIS supplements the VISION 2040 Final EIS of 2008. VISION 2050 will contain the region's multi-county planning policies, which are required by the Washington State Growth Management Act, and a regional strategy for accommodating forecasted population and job growth through 2050. 1 The VISION 2050 update is also needed to address pressing environmental issues, such as climate change, the health of Puget Sound, and preservation of open space. To address these needs, three regional growth strategy alternatives are identified in the Draft SEIS:</p> <ul style="list-style-type: none"> <li>• Stay the Course (No Action);<sup>2</sup></li> <li>• Transit Focused Growth;<sup>3</sup> and</li> <li>• Reset Urban Growth.<sup>4</sup></li> </ul> <p>Each alternative distributes growth in a different pattern (compact; compact/High Capacity Transit focused; more dispersed) and would result in substantially different future environmental, social, and economic outcomes.</p> <p>Preferred alternative</p> <p>The Draft SEIS does not identify a preferred alternative. However, the analysis in the Draft SEIS indicates that the Transit Focused Growth Alternative would produce outcomes that best respond to the Region's need to address the pressing environmental issues mentioned above, identified as the key reasons the VISION 2050 update is needed. For example, while all alternatives have similar impacts, "...the contribution of growth to climate change is inversely proportional to the compactness and density of new development."<sup>5</sup> The Draft SEIS analysis also indicates that the Transit Focused Growth Alternative best supports the objectives and desired outcomes identified by the Growth Management Policy Board and the public.<sup>6</sup> For these reasons, and because it will be essential to accommodate 1.8 million more people and 1.2 million more jobs in a region that is currently working to address environmental and climate challenges, we support and recommend selection of the Transit Focused Growth Alternative, which emphasizes Transit Oriented Development, as the preferred alternative.</p> <p>The Draft SEIS analysis conveys that the Transit Focused Growth Alternative would substantially advance the following outcomes:</p> <ul style="list-style-type: none"> <li>• Improved human health and safety due to increased walking and biking, reduced vehicle miles traveled and air emissions, reduced vehicle collisions, and increased access to healthy food;<sup>7</sup></li> <li>• Improved economic health due to lower expenses for transportation, support for affordable housing, economic benefits to centers and High Capacity Transit communities, lower municipal infrastructure costs, and reduced energy consumption;<sup>8</sup></li> <li>• More favorable environmental outcomes due to fewer vehicular emissions (criteria pollutants, air toxics, and greenhouse gases); conservation of farm and forest lands, recreation areas, wildlife habitat and biodiversity, open space and visual/aesthetic benefits, water quality protection, and the array of ecosystem services provided by the natural environment, enabled by having less sprawl/dispersed development;<sup>9</sup></li> <li>• Increased convenience and efficiency of the transportation system;<sup>10</sup> and</li> <li>• Improved human physical and mental well-being from all the above.<sup>11</sup></li> </ul> <p>1 Forecasts show the region needs to plan for 1 .8 million additional people and 1.2 million new jobs by 2050.</p> <p>2 Stay the Course (No Action) Alternative would continue the current VISION 2040 Growth Strategy: compact growth focused in Metropolitan and Core cities with regional growth centers.</p> <p>3 Transit Focused Growth Alternative would have more compact growth focused in high-capacity transit areas in Metropolitan, Core and HCT Communities, with less growth in outlying areas.</p> <p>4 Reset Urban Growth Alternative would have growth more distributed throughout the urban growth area, while still assuming a large share of growth to Metropolitan and Core cities, with more growth in outlying areas.</p> <p>6 Draft SEIS, pages 4-5. Desired outcomes identified by the Growth Management Policy Board and the public during the scoping process pertain to climate, environment, equity, health, housing, mobility and connectivity, natural resources, public facilities and services, resilience, and rural areas.</p> <p>7 VISION 2050 Draft SEIS, p. 30</p> <p>8 VISION 2050 Draft SEIS, p. 30</p> <p>9 VISION 2050 Draft SEIS, p. 30</p> <p>10 VISION 2050 Draft SEIS, p. 37</p> <p>11 VISION 2050 Draft SEIS, p. 63</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The agency's preference for the Transit Focused Growth alternative has been acknowledged.

Commenter	Comment Number	Comment Text	Response
U.S. Environmental Protection Agency	2	<p>As for the other alternatives analyzed in the Draft SEIS, while the Stay the Course (No Action) Alternative would continue to implement VISION, our review finds that it would not do so with the level of rigor needed to accommodate the projected population and employment growth, particularly with advancing climatic changes, diminishing natural habitats, species, and resource lands. With development pressures placing increasing demands upon the natural and built environment, we recommend that additional strategies are needed to protect and restore environmental health, recover declining habitats and species, and advance equity and human well-being.</p> <p>In addition, the Draft SEIS analysis conveys 12 that the Reset Urban Growth Alternative, which favors more dispersed development in outlying areas, would result in outcomes that would substantially retreat from, rather than advance, progress toward achieving the regional VISION and goals of the Washington State Growth Management Act. The Reset Urban Growth Alternative would not accommodate the projected population and employment growth in an environmentally protective or sustainable manner because it would:</p> <ul style="list-style-type: none"> <li>• Develop the most land (331,000 acres as compared to 285,000 acres with the Transit Focused Growth Alternative);</li> <li>• Result in the least population and employment growth near high-capacity transit (44% as compared to 75%);</li> <li>• Increase the average time stuck in traffic each year (32 hours as compared to 29 hours);</li> <li>• Reduce the number of jobs accessible by transit, walking, and biking (vs. an increased number with the Transit Focused Growth Alternative);</li> <li>• Increase greenhouse gas emissions (vs. decreased GHG emissions with the Transit Focused Growth Alternative);</li> <li>• Increase growth to areas with regionally significant habitat (vs. lessened growth to these areas);</li> <li>• Result in the highest addition of impervious surface to the region (24,300 acres as compared to 19,600 acres);</li> <li>• Increase the need to construct or expand infrastructure in areas not currently served (vs. less growth in outlying and rural areas);</li> <li>• Result in more development and negative impacts to outlying and rural areas (vs. less development in these areas); and</li> <li>• Reduce proximity to high capacity transit for communities of color and low-income communities (vs. providing greater proximity to high capacity transit for these communities with the Transit Focused Growth Alternative).</li> </ul> <p>12 VISION 2050 Draft SEIS, Table ES-3</p>	Comments acknowledged.
U.S. Environmental Protection Agency	3	<p>Mitigation measures The Draft SEIS contains many helpful mitigation measures to guide and shape implementation of the adopted growth alternative to achieve desired outcomes. We recommend that combining the measures to "Conduct community participation and visioning exercises to help guide planning, development, and investments," and "Integrate environmental review and mitigation into the subarea planning process," could help increase the ability to achieve equitable, sustainable, and context sensitive outcomes.</p> <p>We also recommend that the mitigation measures from VISION 2040 be reviewed for possible updates that may be needed. We further recommend that PSRC conduct periodic reviews of the mitigation measures to continually refine, strengthen, and adapt them to support VISION.</p> <p>Thank you for the opportunity to review the VISION 2050 Draft SEIS. If you have questions about our comments, please contact my staff, Elaine Somers at (206) 553-2966 or somers.elaine@epa.gov, or you may contact me at (206) 553-1841 or <a href="mailto:nogi.jill@epa.gov">nogi.jill@epa.gov</a>.</p> <p>Sincerely, Jill A. Nogi, Chief Policy and Environmental Review Branch</p>	The mitigation measures from the VISION 2040 FEIS were reviewed, updated, and augmented for the VISION 2050 SEIS. The two Land Use mitigation measures were combined as suggested.
350 Seattle	1	<p>Dear PSRC,</p> <p>Thank you for giving us the opportunity to comment on Vision 2050: Draft Supplemental Environmental Impact Statement (DSEIS). 350 Seattle works toward climate justice by organizing people to make deep system change: resisting fossil fuels; building momentum for healthy alternatives; and fostering resilient, just, and welcoming communities. We urge you to consider how long-range planning can be a positive force in the fight to contain climate change.</p> <p>First, before addressing climate issues, please know that we welcome PSRC's renewed focus on equity planning — in particular we appreciate the 20-page section on Environmental Justice and its analysis of displacement risk and transportation equity. It is very dismaying to us however, that PSRC seems to have little focus on the other great challenge of the coming decades: climate change. In fact, based on the DSEIS, it seems that PSRC currently has no viable plan to aid our region in responding to the climate catastrophe we face. Here are some suggestions that would remedy the situation.</p> <ol style="list-style-type: none"> <li>1. Please address the full range of climate change impacts on human communities in this DSEIS.</li> </ol> <p>The DSEIS barely touches on climate change impacts on human communities. Apart from a discussion on sea-level rise impacts on coastal communities, the document fails to make a clear link between climate change and its many significant impacts on communities, including reduced summer water resources, heat waves and health effects, changes to our agricultural systems, reduced air quality from wildfires, and the increasing spread of infectious disease. These are strange omission for two reasons; first, the University of Washington's Climate Impacts Group, a local authority, has identified these and other impacts to local communities (see here). Second, climate change is widely expected to have disproportionate impacts on traditionally disadvantaged communities, and given PSRC's emphasis on equity, this document should be laser-focused on addressing what is rapidly becoming the largest environmental justice issue on the planet.</p> <ol style="list-style-type: none"> <li>2. Please cite IPCC research on how quickly we need to reduce our GHG emissions to avoid climate catastrophe.</li> </ol> <p>The DSEIS completely ignores the essential question of how quickly we need to reduce our GHG emissions. In October, there was a well publicized report from the Intergovernmental Panel on Climate Change (IPCC), that stated that the international community had only 12 years to reduce our emissions by 45% in order to avoid widespread catastrophe (see here). And the EPA has made it increasingly clear that patterns of urban development play a key role in the effort to limit GHGs (see here).</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. More information on climate change was added to the SEIS.

Commenter	Comment Number	Comment Text	Response
		<p>Significant development factors include: the compactness of communities, the transportation infrastructure we provide, the energy efficiency of the structures we construct, and the sequestration of CO2 through forest and open space management. The DSEIS should link all of these factors to the need to reduce GHG emissions.</p> <p>3. Please compare each alternative's projected GHG levels with the level identified by the IPCC as necessary to avert the worst climate change catastrophe. The DSEIS does report on the future greenhouse gas emissions of the three future growth alternatives it considers, but fails to include information on how utterly inadequate these alternatives are to meeting the GHG reduction level identified by IPCC. In analyzing the three alternatives, the DSEIS states that under the "stay the course" alternative, CO2e would drop from 47000 metric tons per day in 2014 to 41,000 in 2050 (a drop of about 13%), and under the "reset urban growth" alternative, it would drop to 41,400 in 2050 (a drop of about 12%). Under the transit-focused growth alternative, it would drop to 39,600 in 2050 (a drop of about 16%). None of these declines are remotely enough! The extent to which they are inadequate needs to be specifically identified in the DSEIS.</p>	
350 Seattle	2	<p>4. Please include an additional alternative that is designed to achieve the level of GHG reduction that the IPCC identifies as needed to avert the worst climate change catastrophe.</p> <p>The DSEIS should also include at least one alternative that actually meets the needed GHG reduction targets. Compared to the alternatives you have selected, this alternative would need to have more compact mixed-use development, more transit and active transportation infrastructure, and less general purpose traffic right of way. This alternative would need to impose higher standards of energy efficiency for buildings. It would also need to include open space and forest management practices that promote quantifiable carbon sequestration. In identifying this alternative, PSRC needs to identify the right combination of regional policies so that overall the alternative would reduce our emissions to the level required to avert climate catastrophe.</p> <p>5. Please include more information on how our communities can adapt to the climate change impacts we know are coming.</p> <p>There is virtually nothing in the DSEIS about how communities will adapt to the climate impacts that are already here, and bound to grow more problematic in future -- these include worsening heat waves and poor air quality from smokey skies, the increased likelihood of disease vectors, heavier rainfall events, floods, and sea level rise.</p> <p>6. Please prioritize climate change by leading with a substantial new section in the DSEIS entirely devoted to policies fostering rapid GHG reduction and climate change adaptation.</p> <p>If we do not undertake a rapid and massive mobilization to change our carbon-based economy to a sustainable energy system, climate change will lead to mass extinctions, countless waves of climate refugees, raging epidemics, destruction of coastal cities and towns, the burning of our planet's forests, and other catastrophes. Taking action is imperative — and we, here in the U.S.A., have the responsibility to lead the way and reduce GHGs as fast as possible, given that we are responsible for well over half of historical emissions.</p> <p>PSRC planners have a unique and important role to play in the struggle to contain the worst impacts of climate change. Your plans are foundational to the effort to actually meet our GHG reduction targets, and ultimately to our ability to adapt to this challenging future. A focus on mitigating GHGs and adapting to climate change should be your North Star. Mitigation of GHGs and adaptation to climate change must be principle organizing topics in the DSEIS.</p> <p>Thank you for your attention.</p> <p>Sincerely, Andrew Kidde Meg Wade Alice Lockhart Emily Johnston 350 Seattle</p>	<p>The Draft SEIS analyzes alternative regional distributions of growth. While growth patterns have a direct relationship to travel behavior which results in greenhouse gas emissions, there are many other factors related to climate that are not part of the Draft SEIS analysis, such as building energy use and other sectors of the economy. The Transit Focused Growth and Preferred Growth Alternative include growth patterns designed to maximize use of transit to reduce transportation-related emissions. VISION 2050 has been updated to include additional considerations on climate change, including new policies and actions in a new stand-alone climate change chapter. These include provisions to mitigate transportation impacts. Additional mitigation measures related to climate change were added throughout Chapter 4 of the Final SEIS.</p>
Climate Solutions	1	<p>To whom it may concern:</p> <p>Climate Solutions appreciates the opportunity to provide comments on the Draft Supplemental Environmental Impact Statement for Vision 2050. As our region continues to grow, we have the opportunity to plan and ensure that this growth is sustainable and equitable. Climate Solutions is a clean energy nonprofit organization working to accelerate clean energy solutions to the climate crisis. The Northwest has emerged as a center of climate action, and Climate Solutions is at the center of the movement as a catalyst, advocate, and campaign hub. For 20 years, we have cultivated political leadership in the Northwest under the proposition that clean energy and broadly-shared economic prosperity go hand-in-hand, building a powerful constituency for local, regional, and state action on climate and clean energy.</p> <p>The transportation sector is responsible for the largest share of Washington's greenhouse gas emissions and other toxic pollutants, making this sector a critical part of addressing the climate change and air quality in Washington, and ensuring the Puget Sound Region is a healthy, sustainable region in which to live.</p> <p>Vision 2050 is a basis for this critical planning. Therefore, we offer the following comments on the SEIS in the hopes that the final SEIS will even more comprehensively assess climate and equity impacts and how they interact.</p> <p>Our strong preference for a preferred alternative is the Transit Oriented Growth alternative, as it performs better than the others in most measures, and in particular, it decreases greenhouse gas emissions compared to Stay the Course. However, this alternative is still inadequate when it comes to our region addressing the climate crisis and we would like to see this alternative expanded, and more measures included, to further mitigate climate change—and the inequitable impacts that follow.</p> <p>Under the Transit Oriented Growth alternative, emissions are projected to be 39,000 tons per day of CO2e. Though this is a 17% decrease from the emissions that would occur under the Stay the Course alternative, this is insufficient. Though the SEIS references the regional targets set by Puget Sound Clean Air Agency and the state of Washington's statutory emissions reductions requirements, it does not explicitly outline how the different alternatives compare to these emissions reductions pathways. Further, the Washington Department of Ecology has recommended adjusting the current state limits to an 80% reduction below 1990 emissions by 2050 as determined by the most recent science (Washington Department of Ecology, Publication no. 16-01-010), a level consistent with California and Oregon along with many other peer jurisdictions globally.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The Climate Solution's preference for the Transit Focused Growth alternative has been acknowledged.</p>

Commenter	Comment Number	Comment Text	Response
Climate Solutions	2	<p>Since climate change is listed as a key change and challenge to build on from Vision 2040, the SEIS must adequately address both mitigating climate change and its impacts that interface with other issues covered in the SEIS. Since the alternatives listed in the SEIS reduce greenhouse gas emissions compared to Stay the Course, mitigations are not technically required. However, climate change mitigations should be considered and listed in the SEIS. In addition, Stay the Course is not an adequate baseline by which to measure emissions reductions—the baseline should be the emissions reductions that are required to limit warming to 1.5 degrees Celsius.</p> <p>The greenhouse gas emissions attributable to the Transit Oriented Growth alternative, according to the SEIS, are largely a result of decreasing vehicle miles traveled. Given this, it is important to examine how transportation modes are analyzed and the mitigation actions associated with reducing negative transportation impacts.</p>	VISION 2050 has been updated to include additional considerations on climate change. New policies and actions are in a new stand-alone climate change chapter, including provisions to mitigate transportation impacts.
Climate Solutions	3	<p>Jobs accessible by transit is defined in the SEIS as a 45-minute long trip or less. Jobs accessible by walking and biking are within one mile or three miles, respectively. However, these definitions do not encompass one of the primary barriers to these modes of transportation, which is safety. Not feeling safe is the most commonly cited reason people in the City of Seattle choose not to bike (SDOT Bicycle Participation Phone Survey of Seattle, 2013). Thus, estimating job accessibility solely by distance will likely underestimate the amount of people who will actually choose to walk or bike.</p> <p>We encourage the Final SEIS to incorporate safety into its definition of jobs accessible by walking or biking. In addition, safer infrastructure for active transportation methods should be listed under the general transportation mitigation measures. Making walking and biking safer is an issue of environmental justice—people of color and lower income people are more likely to be regular bicycle riders and are also more likely to be seriously injured or killed while walking or biking (People for Bikes, “Building Equity,” 2015; WSDOT Gray Notebook, March 2018). Incorporating mitigation measures that promote active transportation and make these modes safer will both help Vision 2050 be more equitable and more sustainable.</p>	A transportation safety mitigation measure has been added to the SEIS. The VISION 2050 Transportation section includes policies on safety.
Climate Solutions	4	Promoting Orca Lift is a mitigation measure listed in the SEIS that we support, and we would like SEIS to go further by promoting its expansion to cover first and last mile options that include non-vehicle transportation. Currently, only vehicle providers (Uber, Lyft, Car2Go, and ReachNow) are listed as shared mobility providers with whom cooperation is encouraged. This should be expanded to include bike and scooter shares such as Jump and Lime, and to encourage Orca card use and the associated discount programs across these modes.	Nonmotorized shared mobility providers have been added to the Transportation mitigation measure on shared mobility.
Climate Solutions	5	The Transit Oriented Growth alternative does carry a heightened risk of displacement. Not only is displacement socially disruptive and inequitable, but it also brings with it negative climate impacts from sprawl and greater distances traveled, and in turn, climate change is not equally felt across communities. We appreciate the related mitigation measures listed for Environmental Justice, and we encourage you to evaluate additional measures regarding displacement, and to be more specific about those listed.	Additional displacement mitigation measures have been added.
Climate Solutions	6	<p>The Energy analysis in the SEIS should be updated to reflect Washington’s new trajectory: By 2050, Washington’s electricity grid will be 100% clean. In addition, transportation electrification is occurring rapidly, and under the Clean Buildings for Washington Act, natural gas efficiency standards will improve. Relying on national consumption projections from the U.S. Energy Information Administration likely does not reflect what will happen in Washington State. Additionally, “promote alternative energy sources” is a listed mitigation measure. This definition is open to interpretation. We would suggest “energy sources that do not emit greenhouse gases.”</p> <p>Thank you again for the opportunity to provide comments on the Draft Supplemental Environmental Impact Statement for Vision 2050. Vision 2050 will help guide the growth of our region and thus the SEIS should include an alternative that will lead to greater greenhouse gas emissions reductions, while improving transportation choices and access to opportunity to all in our region.</p> <p>Thank you for your work and for considering our comments, Leah Missik Washington Transportation Policy Manager Climate Solutions</p>	The SEIS has been updated with more current information on the energy trajectory for Washington State.
Joint letter: Emerald Alliance, Transportation Choices Coalition, Mountains to Sound Greenway, Trust for Public Land, Conservation Northwest, SMWatts Consulting LLC	1	<p>To: PSRC From: Emerald Alliance for People, Nature and Community Partners RE: Draft SEIS on current growth alternatives for VISION 2050 Date: April 29, 2019</p> <p>Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement for VISION 2050. The Emerald Alliance, on behalf of the undersigned partners, strongly supports a final Growth Plan that prioritizes and internalizes the foundational value of the region’s natural infrastructure and systems as core to ensuring the sustainability of its communities, environment and economy. The region cannot afford to lose more ground—literally—as it absorbs the expected growth over the coming three decades. As described in your own Regional Open Space Conservation Plan (ROSCP), failure to prioritize the protection of the 3 million acre regional open space network, especially the 463,000 acres of at-risk open space, renders the prospect of sustainably guiding growth all but impossible. As important, are considerations of the beneficiaries of this sustainable growth.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS.

Commenter	Comment Number	Comment Text	Response
Joint letter: Emerald Alliance, Transportation Choices Coalition, Mountains to Sound Greenway, Trust for Public Land, Conservation Northwest, SMWatts Consulting LLC	2	<p>As PSRC considers comments and moves to choosing a preferred growth alternative, we ask members of the Growth Management Policy Board to:</p> <p>Evaluate strategies for accommodating growth through a people-forward lens at the intersection of human health, equity and inclusion, access to nature, economic resiliency and environmental quality and justice.</p> <p>Double down on anti-displacement and create real actions, backed up by dedicated sources of funding, that mitigate for the negative impacts of growth in historically underserved communities and in communities where concentrated growth is expected to exacerbate the current trend of displacement (such as in the overall preferred Transit Focused Growth Alternative).</p> <p>Adopt more inclusive community engagement strategies to ensure that all voices are heard as the region considers how and where growth will be accommodated and who benefits from that future growth.</p> <p>Consider the creation of a Growth Equity Cabinet, following the model set by King County's Land Conservation Initiative, Equity Cabinet. This regional body can work to ensure that the Multicounty Planning Policies are in line with overarching goals of diversity, equity and inclusion, especially in the allocation of funding to improve access to open space, or nearby nature (that are within a 10 minutes walk from home).</p>	<p>VISION 2050 has been updated throughout to include additional considerations on equity and displacement. The Regional Collaboration section includes a new action to develop a regional equity strategy, which will provide the opportunity to consider additional work.</p> <p>Establishing an equity advisory board would be a decision of the Executive Board apart from VISION 2050. The regional equity strategy will be an opportunity to potentially explore options for Executive Board consideration and to identify resources to support local actions.</p>
Joint letter: Emerald Alliance, Transportation Choices Coalition, Mountains to Sound Greenway, Trust for Public Land, Conservation Northwest, SMWatts Consulting LLC	3	Align the final Growth Plan with the Regional Open Space Conservation Plan with a specific call out to the ten strategies for accelerating the protection of open space (see chapter 6: Conservation Action Plan).	Mitigation measures in the SEIS are implemented, in part, through policies in VISION 2050. Implementation of the Regional Open Space Conservation Plan is supported by an updated policy in the VISION 2050 Environment section. A new action also calls for implementing and updating the open space plan.
Joint letter: Emerald Alliance, Transportation Choices Coalition, Mountains to Sound Greenway, Trust for Public Land, Conservation Northwest, SMWatts Consulting LLC	4	<p>Support Multicounty Planning Policies (MPP) that scale up and accelerate the conservation of the 463,000 acres of at-risk open space across the region. Once lost, these acres cannot be recovered or replaced and their loss compromises the region's ability to adapt to the impacts from changes in climate patterns and further exacerbates environmental degradation, displacement and income inequality.</p> <p>Build tangible accountability measures into the Plan's policies and actions that extend to the MPP such that they provide irresistible incentives and effective disincentives for the impacts of policies in local jurisdictions.</p>	Comment acknowledged. A new Regional Collaboration action directs PSRC to track the implementation of VISION 2050 through monitoring and periodic evaluation. The process to develop measures, including open space measures, will be conducted after VISION 2050 is adopted.
Joint letter: Emerald Alliance, Transportation Choices Coalition, Mountains to Sound Greenway, Trust for Public Land, Conservation Northwest, SMWatts Consulting LLC	5	<p>Of particular interest in the growth alternative chosen, we prioritize the alternative that maximizes the following priorities:</p> <ul style="list-style-type: none"> <li>• Focus growth in existing urban growth areas and away from unincorporated rural areas. This protects rural natural landscapes from conversion to impervious surface, vital natural resource lands, and minimizes the impacts of new growth on receiving tributaries to Puget Sound.</li> <li>• Furthermore, focus growth in Metropolitan Cities, Core Cities and High-Capacity Transit Communities. This maximizes the use of high-capacity transit which lessens the overall footprint of growth in terms of: <ul style="list-style-type: none"> <li>- minimizing the addition of impervious surface and polluted runoff into receiving surface water;</li> <li>- reducing car dependency;</li> <li>- lowering vehicle miles traveled per capita;</li> <li>- lowering GhG emissions and other pollutants that cause poor air quality;</li> <li>- improving the jobs/housing ratio;</li> <li>- lowering the need and thus the financial burden of expanding public services in rural, less densely populated areas.</li> </ul> </li> </ul>	Comments noted. The Preferred Growth Alternative is based on the Transit Focused Growth alternative.
Joint letter: Emerald Alliance, Transportation Choices Coalition, Mountains to Sound Greenway, Trust for Public Land, Conservation Northwest, SMWatts Consulting LLC	6	<p>Recognition of the impacts of displacement, which drives people in search of affordable housing further away from designated growth centers, undermining intentional growth patterns and the conservation and protection of open spaces and otherwise rural, natural landscapes. Therefore, we make the above recommendations with the caveat that VISION 2050 must:</p> <ul style="list-style-type: none"> <li>- articulate specific policies with actions and dedicated funding that addresses truly affordable housing and aggressively mitigates against displacement of residents and businesses.</li> <li>- invest in the capacity of communities to engage deeply in long range planning to ensure that the policies recommended reduce, rather than exacerbate inequities across central Puget Sound.</li> </ul> <p>The Emerald Alliance looks forward to working with PSRC as Vision2050 moves forward toward finalizing a growth plan for the future.</p> <p>Sincerely, Tracy Stanton Executive Director</p> <p>Partners signing on in support of this letter:</p>	VISION 2050 has been updated to include additional consideration of displacement. See VISION 2050's Regional Collaboration, Development Patterns, Housing, and Economy sections for policies related to displacement.

Commenter	Comment Number	Comment Text	Response
		<p>Amy Brockhaus, Mountains to Sound Greenway Trust            Kitty Craig, The Wilderness Society            Hester Serebrin, Transportation Choices Coalition            Cary Simmons, The Trust for Public Land            Mitch Friedman, Conservation Northwest            Sean M. Watts, SMWatts Consulting, LLC</p>	
<p>Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium</p>	1	<p>To whom it may concern:            Thank you for the opportunity to comment on the DEIS for Vision 2050. Collectively our groups are looking to Vision 2050 and its supporting analysis to lead with racial and social equity; to emphasize policies on health, equity, and the environment; to focus on action items and implementation of VISION; and to use specific targets and performance metrics to measure success and add accountability. With that frame in mind, we offer the following comments.            General comments:            --Of the Regional Growth Strategies studied, we prefer the transit focused growth alternative, as it performs best in measures of environment, health, and access to opportunity.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The group's preference for the Transit Focused Growth alternative has been acknowledged.</p>
<p>Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium</p>	2	<p>--Unfortunately, all three fall short of what the region needs to attain by 2050 to minimize the impacts of adding 1.8 million people (and 1.2 million new jobs) to our region's natural and social ecosystems. We face a considerable challenge dealing with such growth including increased development, reduction in land cover, more transportation infrastructure, decreased habitats, health disparities, various and sustained impacts from climate change, and ongoing displacement of people of color and people with low incomes.</p>	<p>Comment acknowledged.</p>
<p>Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium</p>	3	<p>--We also know that growth in certain areas poses a higher risk of displacement, and that we are also currently unable to model such displacement. Given that if we fail to effectively prevent displacement, we will not only disrupt communities, but fail to meet our climate goals as people are pushed further beyond the reach of good transit service, it is critical to mandate anti-displacement measures as part of this - or any - scenario.            --While we understand the difficulty in projecting where people of color and low-income people will live in 2050, we believe that given known trends of displacement that to assume these demographics will stay in place and benefit from the investments that come to their communities paints an unrealistic picture of outcomes, not only for the direct benefits to these communities but to larger goals around reducing VMT and GHG emissions, which will likely instead go up as communities are pushed further from urban areas with good transportation infrastructure and services.            --PSRC should try applying national displacement trend analysis, and/or find some way of qualitatively telling the story of what could happen under different scenarios if demographics do not remain in place and if people are displaced. An estimate or wide range of outcomes would help us make a plan for mitigation that could address problems as they arise.</p>	<p>The Executive Summary, the Environmental Justice chapter, and Appendix H of the SEIS note that the Transit Focused Growth alternative will likely result in more growth in areas of higher displacement risk. The Opportunity Index map (Appendix H) could help identify areas where displaced residents could find alternative spaces connected to transit and other resources. The tables of mitigation measures list anti-displacement options jurisdictions could implement to both encourage the reduction of displacement and encourage affordable housing in areas of high opportunity for families experiencing displacement. Additionally, the forthcoming regional equity strategy will provide the opportunity to consider additional work focused on addressing displacement. Also see responses to more detailed comments below.</p>
<p>Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium</p>	4	<p>-Because of the limitations of the strategies, mitigation is more important than ever. This intrinsic tension between the largely inevitable growth and its impacts, the role of PSRC in determining a growth strategy, and the role of local jurisdictions in upholding policies and mitigation means that we must collectively commit through actions, structural changes, eligibility requirements, targets, and other incentives in order to make progress.            --Direct funding to mitigate displacement and other undesirable impacts on environmental justice communities is also a key and universal approach that should be explored. PSRC should explore identifying funding that can help people financially to stay in place or to return to their communities, whether through rent control or direct subsidies. Using the City of Seattle's Equitable Development Fund as a model, PSRC could fund organizations doing anti-displacement work around the region to develop locally-appropriate and community-driven solutions.            -Name race, define equity, and develop a more nuanced definition of environmental justice (EJ) for use in analysis.            --Demographic characteristics of residents don't, of themselves, define environmental justice. Population characteristics married with a spatial environmental benefit/burden depiction point to geographies of concern and provide the backdrop to consider how alternatives can be comparatively 'seen' and optimized to counter and reverse environmental injustices. As described below, analysis should include statewide mapping on EJ disparities that has already been done.            -Help the audience understand not only the incremental change, but the baseline and total impact in each performance area.            --We suggest for each outcome (e.g. air quality, access to opportunity, etc.), including total and disaggregated data for baseline, incremental change (across each RGS), end result (across each RGS), and any relevant targets for that outcome (e.g., regional GHG emissions targets).</p>	<p>The baseline, incremental, and 2050 impact numbers have been added to additional evaluation measures where applicable (see Appendix B). VISION 2050 provides a framework for regional and local action. The forthcoming regional equity strategy will include displacement mitigation strategies. People of color are named throughout the SEIS. The definition of equity from VISION 2050 has been added to the SEIS: All people can attain the resources and opportunities that improve their quality of life and enable them to reach full potential. Communities of color, historically marginalized communities, and those affected by poverty are engaged in decision-making processes, planning, and policy-making. A new action on outreach in VISION 2050's Regional Collaboration section supports collaborating with historically underrepresented groups. While local jurisdictions conduct their own community engagement, they are encouraged to do so in an inclusive way. The regional equity strategy could further support the goal of inclusive community engagement. For the development of VISION 2050, PSRC conducted a wide variety of outreach and engagement strategies, including</p>

Commenter	Comment Number	Comment Text	Response
		<p>--This has implications for how we understand the measures necessary not only to meet regional environmental targets, but also blurs our understanding of ongoing reality that communities of color, low-income communities, refugees, immigrants, and indigenous communities are already living with disproportionate harm and adverse effects from historic and ongoing systemic oppression.</p> <p>-Identify structural mitigation and accountability measures.</p> <p>--An equity cabinet or environmental justice committee would be able to provide guidance and help in ensuring action and implementation of mitigation strategies broadly across categories.</p> <p>Community engagement and participation strategies should be constantly re-evaluated to ensure we are connecting with the most underrepresented groups that experience the most dire outcomes from the built environment, to ensure we understand their concerns and co-create solutions. Outreach should be in multiple languages and specific outreach should be done with communities at high risk of displacement.</p> <p>-Define affordable housing</p> <p>--Ensure that mitigation that recommends the creation of affordable housing is prescriptive enough to meet the lowest-income residents and allow them to stay in place.</p> <p>-Additional comments in specific policy areas are found in the chart below.</p> <p>Sincerely,  Transportation Choices Coalition  The Wilderness Society  Cascade Bicycle Club  Futurewise  Housing Development Consortium  Seattle Public Schools  Sierra Club WA  Climate Solutions  Puget Sound Sage</p>	<p>workshops and open houses, youth engagement, targeted social media and social media advertising, printed materials in nine languages, public presentations, and an online open house. Particular attention was paid to engagement methods targeting under-represented and hard-to-reach communities. PSRC will continue to seek ways to improve outreach and opportunities for the public to become engaged in regional planning efforts. Also see responses to more detailed comments below.</p>
<p>Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium</p>	<p>5</p>	<p>Questions: Does this element sufficiently tackle race and social equity? Is the DEIS analysis of circumstances and impacts correct? What's missing? What benefits do we want to emphasize? What disproportionate burdens do we want to avoid? Mitigation -What is good or Insufficient? What's missing? Accountability - How can we focus on action and implementation? Accountability- How can we use targets, performance measures, and consequences?</p> <p>Projected benefits to EJ populations</p> <p>We appreciate that the outcomes for the Vision 2050 EIS are disaggregated by these historically marginalized groups to understand disproportionate outcomes between them and dominant groups. While we understand the difficulty in projecting where people of color and low-income people will live in 2050, we believe that given known trends of displacement that to assume these demographics will stay in place and benefit from the investments that come to their communities paints an unrealistic picture of outcomes, not only for the direct benefits to these communities but to larger goals around VMT and GHG emissions, which will likely go up as communities are pushed further from urban areas with good transportation infrastructure and service. PSRC should try applying national displacement trend analysis and/or find some way of qualitatively telling the story of what could happen under different scenarios if demographics do not remain frozen in place and if people are displaced. An estimate or wide range of outcomes would help us make a plan for mitigation that could address problems as they arise. We not only do not want to exacerbate the suburbanization of poverty, but want to understand existing disparities and use the growth strategy and related policies to proactively improve outcomes for people of color and low-income folks, with regard to health, safety, access to opportunity, and more. Given that the analysis shows that POC and people with low incomes will not disproportionately be impacted, and will benefit from access to transit therefore does not include mitigation for what happens if they are indeed displaced. Without mitigating and addressing displacement and gentrification, investments will harm, as opposed to benefit, communities of color and low-income communities. Jobs do not benefit people of color and low-income communities unless targeted local hire, women, and minority hire; job ladders; community-benefits agreements; and training and accessibility is built into job programs. PSRC should conduct historical research to understand displacement trends so that this work can be incorporated into modeling, and begin to track where people are being displaced to, providing information on how to address displacement and plan for subsequent transit needs. Set affordability and anti-displacement targets across the region.</p>	<p>Socio-demographic models cannot forecast displacement and the SEIS does not assume that populations will remain in place. Information has been added to the SEIS to further clarify that the equity geographies are based on current demographics. The purpose of identifying these areas is to estimate how existing populations may be impacted by growth and change, and by extension, how future populations could be as well. Additional qualitative information on displacement trends and the impacts of displacement has been added to the SEIS.</p> <p>VISION 2050 has been updated throughout to include additional considerations on equity and displacement. The Regional Collaboration section includes a new action to develop a regional equity strategy, which will provide the opportunity to consider additional work. The SEIS explicitly considers race and the Equity Analysis appendix discusses equity in greater detail.</p>
<p>Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium</p>	<p>6</p>	<p>Climate equity</p> <p>Equity is and should be named a climate strategy - Show the footprint of fossil fuel burning today What are equity impacts of different climate strategies? Could analyze how Areas of Potential Inundation relate to resident demographics Putting climate resiliency resources to where needs are greatest, based on statewide environmental justice maps. Low income housing proximal to transit, active transportation, jobs, and environmental amenities. Track who benefits from the strategies and tactics on emissions reduction and resiliency investments. Track that emissions reduction benefits are favoring those whose needs are greatest. Track and report on CC vulnerabilities reducing for priority populations.</p>	<p>VISION 2050 has been updated to include additional consideration of climate change and equity. See VISION 2050's new stand-alone climate change section. A new Regional Collaboration action directs PSRC to track the implementation of VISION 2050 through monitoring and periodic evaluation. The process to develop measures, including climate change measures, will be conducted after VISION 2050 is adopted.</p>

Commenter	Comment Number	Comment Text	Response
Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium	7	<p>Climate</p> <p>There is very little in depth discussion about how climate change is and will continue to have disparate impacts on different demographics, including explanation of what those are and proactively how we should be growing to mitigate that. Suggest mapping disparate climate change burdens, impacts, and vulnerabilities. Show PM2.5 and PM10 'maintenance areas'. Define how scenarios vary in benefits to wealthier and whiter neighborhoods. Adaptive management approach - if/when risks/vulnerabilities are identified as inequitable, we may need to adjust our strategy as we go. Track PM2.5 and PM10 'maintenance areas' to identify whether they are becoming less inequitable, or trigger corrective action (e.g., ineligible for funds).</p>	In the SEIS, effects of climate change on environmental justice populations are described in Table 5.5-1 and additional context and mitigation has been added.
Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium	8	<p>Climate</p> <p>Does not include analysis of targets or ability to get toward regional targets. Mentions WA statutory targets - should also mention the updates Ecology recommends so we adhere to the latest climate science. We need climate targets - need to reference PSCAA targets. What are the levers we can move in Vision to actually get to those targets? How would we need to change our growth strategy and which actions would we need in vision? - needs to be holistic to be equitable - and focused on large scale, use health disparities map (see link below). What transportation investments do we need to make to meet GHG goals? How do we need to adjust our investment framework to meet them? Track regional and local reduction targets, and determine how we can hold ourselves accountable, whether through comprehensive plan certification or limiting transportation funds to only projects or jurisdictions that are reducing GHG.</p> <p>Climate - energy use</p> <p>What is energy use of these different growth strategies and of different types of housing? (SFZ, multi-family, new vs. old buildings)</p>	A climate change chapter/section has been added to VISION 2050. It contains updated and new policies to address reducing greenhouse gas emissions and calls for further work to both reduce emissions and monitor progress.
Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium	9	<p>Affordable housing</p> <p>Analysis of affordable housing really needs to be addressed from the point of view of families who need this type of housing most. One concern is "affordable rents" are set by the 30-60% AMI. As income levels are sure to rise in the city/region, the type of resident applying for and opting into this type of housing will vary with time. For example, Seattle's Central District is a hub/urban village where population will increase, transportation improvements will be made, and rents will be set to market rate if not a bit higher. The terms "Affordability" and "Affordable Housing" as they relate to individual jurisdictions and Puget Sound regionally should clearly and plainly be called out in the Vision 2050 DEIS. Affordability gaps persist for those with the lowest incomes (families and individuals) and now extend to middle income families. What are the plans to make housing affordable to middle income families and individuals? Regionally set affordability targets for local jurisdictions.</p>	VISION 2050 has been updated to include additional considerations for housing. A new action calls for PSRC to develop a regional housing strategy and housing needs assessment. Housing needs assessments will need to be updated with the latest income and housing data on an ongoing basis. Affordable housing and housing affordability were defined in the Housing section of VISION 2050, as suggested. Provisions in the Housing section call for providing a range of housing types and choices to meet the housing needs of all income levels and demographic groups within the region. VISION 2050 directs local jurisdictions to develop affordable housing targets and PSRC to provide technical assistance and guidance in developing local housing targets, model housing policies, and best housing practices.
Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium	10	<p>Affordable housing</p> <p>Ensure these units go primarily in 'high access and opportunity zones' to reduce displacement in high displacement risk areas and to give historically disadvantaged populations better access to services, etc. Advance in part through housing type diversity. Emphasize RGS features that improve access to opportunity. For major transportation projects, they might land bank construction siting areas to convert affordable housing. Set targets by % in high opportunity geographies. Create escalator clauses that ratchet leverage on cities if they are not hitting inclusion targets.</p> <p>Affordable housing</p> <p>Identifies growth in areas with a high risk of displacement, but does not model displacement Identifies number of affordable housing units needed to meet demand. Using affordable targets across the region, each city needs to plan for their "fair share". If folks do not hit targets for affordability in their zoning/growth, comprehensive plan certification could be revoked.</p> <p>Housing density</p> <p>Are we providing sufficient housing access in medium density, high opportunity areas, and in areas with a low risk of displacement to people of all incomes? In addition to the .5 mile, we should be modelling medium density (e.g., triplexes, rowhouses, fourplexes) at least within a .75 of rail. We need to understand the impacts to access to opportunity, affordability, and environmental impacts of concentrating more growth in these areas compared to other non-HCT areas. We want to emphasize the benefits of density without being one extreme or the other (maximum density around HCT vs. rural growth). We want to maximize infill development. 2050 ideas and plans around housing density need to be aligned with the cities' plans and their understanding of how urban villages will be supported/built out. We should create structures to ensure that coordination is happening between planning departments.</p>	VISION 2050 contains new and updated policies on equity, access to opportunity, and housing choices. See the Regional Collaboration, Development Patterns, Housing, Economy, and Transportation sections. More specifically, VISION 2050 directs local jurisdictions to develop affordable housing targets and PSRC to provide technical assistance and guidance in developing local housing targets, model housing policies, and best housing practices. Policy and actions in the Housing Chapter direct identifying and addressing the need for affordable housing in local communities and strategies to promote housing affordability in proximity to transit. Definition of walksheds for individual stations should occur through local station area planning. Distances for walksheds used in VISION 2050 are for regional-scale modeling and planning purposes and do not reflect individual station plans or limit actions at the local level.
Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices	11	<p>Transportation - commute times</p> <p>Transportation access to jobs is disaggregated by race and income, but doesn't capture the true story. Doesn't look at vehicle pollution disparities. Transportation focus looks at modes and multi-modal trips. Considering mobility inequities may better reveal variations. "Communities with higher concentrations of people with low incomes and people of color generally have access to more jobs within 45 minutes of transit, a 1-mile walk, or a 3-mile bike trip than the rest of the population. " --&gt; Can we correlate this with actual travel survey data? This doesn't capture actual commute times for these populations, and is contrary to most anecdotal information. It is relatedly important to be able to analyze access to what kind of jobs - those correlated with the income for those folks. If section 5.4.5 was framed and shown as mobility equity, - "who has what</p>	Given the regional scale of alternatives and the large variations in conditions among local areas, the level of detail for the alternatives and environmental analysis has been conducted at a broad programmatic scale. Analysis at the local level is beyond the scope of the SEIS. Localized impacts of growth could vary and would depend on more specific actions that would be considered during project-level environmental review. The access to jobs measure was

Commenter	Comment Number	Comment Text	Response
Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium		<p>access to where" today, then we could consider how alternative differ. Access to (i.e., proximity) transit is good, but actual access to jobs and fast commutes is better. If displacement is exacerbated by a TOD alternative, disproportionately longer commutes will be a given. Because this is not indicated as a problem, there is no mitigation offered. There is mitigation for displacement and housing generally, but nothing about improving transit reliability and speed. Collect and disaggregate data by race, income, and geographic location for commute times. Gap analysis for fast transit trips, multi-modal travel options, identify job matching. Can PSRC help coordinate disseminating information on regional scale transportation projects and how they affect commutes across the region? For example, the Seattle Squeeze and viaduct removal impact people outside of Seattle - how can PSRC better hold all current regional transportation information so that residents know which routes are safe and easy to access? Collect data and have targets around reducing commutes by transit - identifying and fixing transit bottlenecks, adding more active transportation options that stand alone or lead to transit access, etc.</p> <p>Transportation - safety</p> <p>No safety analysis included, so no racial justice analysis of transportation safety. Transportation safety was not included as asked for. It only "promotes safety" by encouraging walking and biking, but these can be unsafe if infrastructure lacks. Transportation safety data should be published and disaggregated by race. Not only are communities of color overrepresented in traffic fatalities and serious injuries, but inequitable policing and enforcement pose both a barrier and safety risk and should be included in equity analysis for safety in transportation. We want people to have access to safe walking and biking networks. We want to prioritize investments in areas that have disinvestment. We want to ensure enforcement does not prevent or hinder people from using active modes to get where they need to go. No mitigation offered. Vision zero should be adopted by VISION. Vision zero should be adopted by ALL jurisdictions eligible for transportation funds. Funding structure should prioritize safety projects in communities of color and low-income communities. PSRC should also keep up to date on how transportation safety and injuries and how they change with new modes and technology. Vision zero should be adopted as a safety goal. Eliminating disparities by race and income in transportation deaths, injuries, and policing should be a performance goal.</p>	produced by PSRC's travel model which uses travel survey data as an input. However, the model cannot forecast wages for the jobs. A variety of transit and other transportation improvements are listed in the SEIS section on transportation mitigation measures. Mitigation measures on transportation safety have been added to the SEIS. Several policies in VISION 2050's Transportation section help to implement these mitigation measures. One VISION 2050 Transportation policy is on improving the safety of the transportation system and achieving the state's goal of zero deaths and serious injuries.
Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium	12	<p>Health</p> <p>Show how determinants of health and health outcomes are distributed. Define where the needs for health inducements are greatest. Include current health disparity portrayal then measure how the 3 alternatives differ in projected health outcomes and projected disparities by 2070. Include assumptions of variation how land use bears on health outcomes. Mitigation may include: distance people and residential units from pollution sources, separate bike/ped from vehicles, and design in healthy food access. Provide free and "pop up" clinics. Expand the model of providing free healthcare and dental care offered to low income residents across the region (as is done in Seattle Center once a year). As demographics shifts by who can afford to live in the city center, we (researchers and planners) need to be proactive and meet residents where they live now. Define environmental determinants of health and fund those who ensure these are provided Account for health determinants and precursors increasingly available where the needs are greatest.</p>	Information on health disparities has been added to the SEIS Environmental Justice chapter. See response above on regional scale level of analysis. Some measures in the SEIS are related to health. See the health section of the Evaluation Criteria to Select a Preferred Alternative document ( <a href="https://www.psrc.org/sites/default/files/gmpb2019may02-ho-seisevaluationcriteria.pdf">https://www.psrc.org/sites/default/files/gmpb2019may02-ho-seisevaluationcriteria.pdf</a> ). The SEIS Environmental Health affected environment and impacts sections describes the relationships between health and land use, transportation, open space, and other measures. Some of the suggested mitigation measures have been added to the SEIS Environmental Health mitigation section. The forthcoming regional equity strategy could potentially explore health disparities.
Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium	13	<p>Air quality</p> <p>Depict how PM2.5 and NOx are distributed. Depict and analyze how air quality relates to demographics. Use UW &amp; Front and Centered's health disparities map to identify areas we should target. Understanding impacts of new infrastructure as well as construction of new infrastructure is important. How are construction zones using the best materials, recycling and disposing of materials in the cleanest cost-efficient ways. We may want to understand impact on traffic, walkability, in addition to pollution released into the air for several major projects across the region. Article with study reference: <a href="https://www.globalcitizen.org/en/content/air-pollution-disparities-in-us/">https://www.globalcitizen.org/en/content/air-pollution-disparities-in-us/</a>. Another article on a new study shows that impacts of air pollution combined with place (F&amp;C maps) are substantial. Mitigations may include: vehicle (esp. fleet) electrification, residential setbacks from roadways, position of bus layover and transfer, prohibition of road expansions in these areas, targeted tree retention and plating policies. The state emissions check program needs to be removed from potential mitigation measures as that ends in 2020. Measures of reducing disparities in exposure over time.</p>	See response above on regional scale level of analysis. Construction impacts on air quality are discussed in the Air Quality cumulative effects section. A measure to mitigate the air quality impacts of construction has been added. The air quality articles are appreciated. In addition, disparities from localized air quality impacts are noted in Table 5.5-1.
Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium	14	<p>Water Analysis claims there are no different impacts between alternatives at the regional level for people of color and people with low incomes. Does not specify whether water impacts (and current access to clean water) are different between low-income and POC groups and white higher-income populations. Does not look at baseline disproportionate impacts of water quality, stormwater impacts, local flooding, etc. Even impacts do not differ across scenarios, we are not told what impacts actually are, and therefore do not have sufficient information to request adequate mitigation. Another point of analysis is to understand clean water access in schools. Some local schools need cleaner water, particularly in the Southeast of Seattle's school district, and likely in other areas of the region. We want to emphasize growth patterns that reduce greenfield development, encourage growth patterns that do not induce road development, especially in areas that already have poor water quality. Given that we do not understand the impacts, it is challenging to imagine the necessary mitigation. But stronger stormwater management from development and agencies, and stronger incentives for transportation projects that remove or do not create additional impervious surfaces, especially in areas of concern would be a good start. What are the actions recommended by the Puget Sound Partnership? Can we require jurisdictions to have stronger stormwater management and prevention requirements in areas with poor water quality? What is the water quality level we need to hit to restore Puget Sound?</p>	Water quality impacts are discussed in the Water Quality and Hydrology section of the SEIS, and has been updated for the Final SEIS. To implement the mitigation measures and improve water quality, new stormwater provisions have been added to the Environment section of VISION 2050. Puget Sound Partnership is providing assistance to help implement these policies and actions.
Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington,	15	<p>Land use</p> <p>Food desert - defined in 2008 United States Farm Bill as "an area...with limited access to affordable and nutritious food, in predominantly lower income neighborhoods and communities. Can transit centers counter disparities in access to healthy food (farm stands) and open space?</p> <p>Land use - schools</p>	Providing healthy food options and parks in transit station areas can improve access to those determinants of health. VISION 2050 Development Patterns policies support access to open space and healthy food for centers, as does the Planning for Whole Communities Toolkit ( <a href="https://www.psrc.org/planning-whole-communities-toolkit">https://www.psrc.org/planning-whole-communities-toolkit</a> ). VISION 2050 discusses the importance of and

Commenter	Comment Number	Comment Text	Response
Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium		<p>What is the impact of school siting outside of UGA? What are consequences for air quality, traffic, safety? stormwater, and greenfield development? Air quality impacts student learning - understanding the analysis of schools and corresponding air quality is also critical. Need to carry forward language on school siting and focusing on requiring schools to be within a UGA and promoting alternative modes of transportation. This overlaps with air quality -- we see an increase of traffic around 30% when there aren't safe land use practices for schools.</p> <p>Open space</p> <p>We should understand how equitable open space and trail access is today. Consider disparities in open space and trail access across race and income. Open spaces have a notable bearing on physical and mental health outcomes, social determinants of health. Safe access to trails encourages activity and improves health outcomes, transit access, and social connection. Coordinate open space protections and trail construction with anti-displacement strategies. Use equitable access to open space as a basis for regional and local prioritization in new acquisitions. Use health indicators and equitable access to trails as basis for regional and local prioritization for trail construction and improvement. Mention, support, and track implementation of Regional Open Space Conservation Plan, investments in areas of high-need. Track Regional Bicycle Network investments in areas of high-need.</p>	has policies on siting schools, institutions, and other community facilities that primarily serve urban populations within the urban growth area. It promotes working cooperatively with school districts to plan for school facilities to meet existing and future community needs, including siting and designing schools to support safe, walkable access. VISION 2050 calls for implementation of the Regional Open Space Conservation Plan, including providing equitable access to urban parks as analyzed in the open space plan.
Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium	16	<p>Displacement</p> <p>The displacement analysis includes race as a factor for displacement, but does not offer any solutions or mitigations. Displacement is assumed across all three alternatives without any thought to what a displacement risk reduction alternative could look like. Displacement risk is assessed across the three alternatives, but the analysis of the actual impact of displacement for the displaced residents, businesses, and cultural institutions is not studied. Where will residents live (likely further away from employment centers and high capacity transit)? Where will commercial and community spaces locate when there is no affordable commercial space? What is the impact of displacement on our carbon emissions and transit ridership? Communities of color and low-income residents will not see the fruits of regional growth if we do not center anti-displacement in our growth strategies. We need both transit focused growth and a very strong anti-displacement mitigation and prevention so that we achieve environmental and equity outcomes. Further, currently available data does not adequately measure displacement risk. The analysis cannot measure cultural displacement vs. economic displacement. Our region needs a full suite of anti-displacement strategies including: Requiring strong community engagement practices at local and regional level; supporting community driven development through regional funding mechanisms; require local jurisdictions to meet affordability targets through a variety of policies and practices such as inclusionary zoning, supporting affordable housing development, etc.; support tenant protections and rent regulation policies at the state legislature; and regionally approved anti-displacement sub-area planning in neighborhoods with high risk of displacement. Set affordability and anti-displacement targets; develop a regionally administered fund to support community-driven anti-displacement fund; require anti-displacement focused subarea plan prior to zoning changes, station area and corridor planning, transit fund allocation, etc. Actionable displacement mitigation and prevention plans, both regionally and for each jurisdiction.</p>	Mitigation measures for environmental justice are included in the mitigation section of the SEIS Environmental Justice chapter. Environmental justice and equity provisions have been added throughout VISION 2050. The action to develop a regional equity strategy has been added to help mitigate the displacement impacts identified in the SEIS. The equity and anti-displacement recommendations can be considered for inclusion in the regional equity strategy and have been shared with the appropriate staff.
Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium	17	<p>Public Services - Water</p> <p>The update needs to include implementation steps for the Hirst decision and subsequent "fix" legislation that passed in 2018. All counties must match rural development with water availability and can no longer rely on the Department of Ecology's outdated rules.</p>	Information on the Hirst decision has been updated.
League of Women Voters of Washington	1	<p>Dear Ms Harris:</p> <p>We appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement for VISION 2050, our region's long-range plan for growth. 2050 is over 30 years away and it is difficult but necessary to anticipate the changes that are likely to occur over that time period, to plan for them, and try to shape the future we want to have. However if we are to be successful in that effort, it is important that we make decisions now that will direct our path toward that future. If that does not happen, we should acknowledge that this vision is unlikely to be achieved.</p> <p>Let us be more explicit. PSRC has developed a Regional Transportation Plan, just updated last fall, and which the Vision 2050 relies on and refers to in the transportation chapter. That plan identifies the gaps in funding that must be filled if the investments identified in the plan are to be met. Just for transit and ferries this gap amounts to approximately \$10 billion to 2040. The plan also describes potential sources of additional revenue which include fare increases, sales tax increases, user fees, and employee taxes. Our Legislature is just now completing a transportation budget, including a capital budget. It does include some of these options, but gets nowhere near to what the PSRC plan says is required to meet the "near term" revenue to 2025. For example, the Washington State Ferries has determined that 13 new ferries will need to be built over the next 20 years. The proposed state budget may fund one, while adding a 25 cent surcharge to fares to help pay for this capital need. Where will the funding come for the rest? There is no significant additional funding for transit operation and maintenance coming from the state. It is unlikely that the gap can be met from local funding. If the gap is not addressed, this will result in overcrowded buses, ferries that break down, and less frequent service. This may be a vision, but not one we want.</p> <p>Let's discuss the impact of the revenue sources that are passed. Many of these such as fare increases, sales taxes, and user fees can be regressive and impact lower income residents negatively. They also can impact demand and actually reduce the transit use we seek to encourage. It will be very important to do a careful cost benefit analysis of any such revenue changes to see what their impact will be before relying on them.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. Comments on transportation funding have been acknowledged.
League of Women Voters of Washington	2	In discussing this with PSRC staff, we were assured that funding at least for Sound Transit projects is in place, and that is reflected in the PSRC Transportation Plan. But is it reasonable to rely on these projects, even assuming they are totally funded, to accommodate the majority of transit trips and associated population growth for the region? If	Transportation system assumptions are based on the best information available at the time. Based on feedback on the Draft SEIS alternatives, for the

Commenter	Comment Number	Comment Text	Response
		<p>indeed we want 75% of that population to be within a half mile of mass transit, what kind of development needs to occur along those lines to make that happen? Are we anticipating more high rises? More apartments, condos or town homes? Is that what people want and what will they have to pay for them? Even if people want to be close to transit, can they afford to live there? Will there be sufficient development to make this housing affordable? And if not, is the tradeoff paying user fees and even higher transportation costs? How will the Vision address these potentially negative consequences?</p> <p>The Vision should clearly lay out the contingencies of what can happen depending on the decisions the region has to make today, and the associated environmental impacts of those decisions.</p>	<p>Preferred Growth Alternative, the regionwide goal for population growth in high-capacity transit station areas was set at 65%. The type of housing in transit station areas will depend on local land use plans. Many station areas are zoned for high- or moderate-density housing. However, even with for Transit Focused Growth alternative, 24% of growth from 2017 to 2050 is expected to be low-density development (Draft SEIS Table 4.1-2). The VISION 2050 SEIS looks at impacts related to growth alternatives and identifies mitigation measures for those impacts.</p>
League of Women Voters of Washington	3	<p>Finally, although the focus of this letter has been on transportation funding related to the Vision, when we look to 2050 we must address the impact of climate change and how that will affect our region. It is anticipated that we will experience warmer but wetter winters and hotter and dryer summers. This will likely mean more flooding and landslides in the winter but lower stream flows and potential droughts and wildfire risk in summer, both of which will place additional demands on state and local governments. The Legislature is currently considering a bill that would add \$62.5 million a year just to address the increased risk of wildfires. Additional resources are also devoted to protecting salmon streams. These competing demands will further limit the ability of local governments to adequately address other needs.</p> <p>In summary, we applaud PSRC for assuming this challenge of looking ahead 30 years and planning for that future. We encourage you to do that with eyes open to the potential realities we face and acknowledge them clearly.</p> <p>Sincerely, Ann Murphy, President League of Women Voters of Washington</p>	<p>Comments acknowledged. VISION 2050 has been updated to include additional considerations on climate change. New policies and actions are in a new stand-alone climate change chapter, including provisions on adaptation and resilience.</p>
Puget Sound Sage	1	<p>Dear GMP Board and PSRC Staff,</p> <p>We appreciate this opportunity to review and submit comments on the Draft Supplemental Environmental Impact for Vision 2050, and want to recognize all of the hard work by staff that has gone into its research and writing.</p> <p>Puget Sound Sage is strong supporter of PSRC's role, and regional governance in general, as a means to grow sustainably and address regional equity. As such, we see the role of PSRC as setting out a bold vision for a healthy environment, equitable economy, and regional cooperation.</p> <p>Unfortunately, the DEIS and three growth alternatives in Vision 2050 do not achieve this. At a time when climate change poses dire harm to our communities and racial disparities undermine our democracy, we expect Vision 2050 to reflect a more transformative strategy to correct course on the patterns of historic growth that have led us here. We see Vision 2050 as an opportunity to center our greatest challenges and take them head on. Instead, it offers three alternatives that assume we can't do much about either climate change or the social equity impacts of growth.</p> <p>We are deeply concerned by several factors:</p> <p>(1) None of the growth alternatives offer a plan in which we eliminate carbon emissions associated with transportation, infrastructure, and growth by 2050 while simultaneously mitigating displacement.</p> <p>(2) Growth impacts are inadequately modeled due to a lack of displacement analysis and related mitigations, and due assumptions that increased transit, density, and jobs will automatically benefit communities of color and low-income communities.</p> <p>(3) PSRC's environmental justice analysis does not adequately define equity geographies nor address historic and future burdens of harm for communities of color and low-income communities from the environmental, cultural, housing, and transportation impacts of growth.</p> <p>(4) For both climate justice and regional equity outcomes, we favor Transit Focused Growth (Alternative 2) to the others. However, Alternative 2 is simply the least worst of the three and not an adequate vision to advance a region where all people can thrive and be healthy.</p> <p>(5) Mitigations for disproportion harm from growth and climate change are inadequate to do anything except push the problems further into the future.</p> <p>Below, we describe in more detail our areas of concern.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. See below for responses to more detailed comments.</p>
Puget Sound Sage	2	<p><b>**1. Climate Change **</b></p> <p>The stakes of climate change for our region could not be higher. The Intergovernmental Panel on Climate Change's Special Report: Global Warming of 1.5 Degrees, released last year, states that we need to reduce CO2 emissions by about 45% from 2010 levels by 2030, and reach net zero around 2050, in order to keep global warming to below 1.5 degrees Celsius – above which will spell disaster for the planet. The link between our region's growth and climate change are obvious – over the past seven decades, we have grown dependent on individual vehicular travel and inefficient, sprawling use of land that is doing damage to the environment.</p> <p>Simply put, we need to be planning for a future in which we have eliminated carbon emissions associated with transportation, infrastructure, and growth by 2050. In other words, not just a plan to reduce the impacts from future population and housing growth, but reversal of the impacts of historic patterns of growth. Unfortunately, Vision 2050 avoids setting any bar for climate change mitigation and merely guides us into the least-worst growth scenario.</p> <p>As such, the DEIS presents inadequate study, analysis, and planning for climate change and its impacts on the Puget Sound Region. It particularly fails to seriously assess impacts to low-income communities, communities of color, refugees, immigrants, and indigenous communities. Lack of bold planning for climate and climate justice in Vision 2050 will result in (1) a failure to reduce carbon reduction goals that we need to ensure a habitable planet for future generations and (2) low-income communities, communities of color, refugees, immigrants, and indigenous communities bearing the worst of the climate impacts because climate change is a threat multiplier that exacerbate existing disparities.</p>	<p>Comments acknowledged. VISION 2050 has been updated to include additional considerations on climate change. New policies and actions are in a new stand-alone climate change section, including provisions on climate equity. In the SEIS, effects of climate change on environmental justice populations are described in Table 5.5-1 and have been updated, as well as the mitigation measures.</p>

Commenter	Comment Number	Comment Text	Response
		<p>Climate change is already impacting the Puget Sound Region, and will only worsen if we do nothing. For example, Vision 2050 mentions that flooding and sea level rise will impact shoreline and watershed communities but does not offer an alternative nor mitigation to address environmental justice impacts. The Duwamish River Valley is expecting 1 ½ ft of sea level rise and 4 ½ ft storm surges and high tides by 2050, and 4 ½ ft sea level rise and 8 ft storm surges and high tides by 2080 (as reported by the City of Seattle). Currently, the Duwamish Valley is also home to indigenous communities, low income communities, communities of color, and immigrants; is the site of superfund clean-up sites, generations of toxic waste, ongoing industrial pollution and toxics production; and has higher rates of asthma and decreased life expectancy compared to other communities in King County. The DEIS acknowledges that environmental justice communities experience disproportionate impacts, but then fails to incorporate climate impacts such as flooding, wildfire smoke, heavier rainfall, decreased snowpack, strained water and energy infrastructure, and increased growth pressures from future climate refugees.</p> <p>Sage strongly urges PSRC to adopt carbon reduction goals that minimize global warming to 1.5 degrees Celsius or lower, study the intersection of climate change and future growth in the Puget Sound Region, and present an alternative plan in which:</p> <ul style="list-style-type: none"> <li>-Carbon emissions are eliminated by 2050</li> <li>-Climate impacts are addressed by growth, transportation, and infrastructure planning and</li> <li>-The social cohesion, civic engagement, and political power of communities of color, low-income communities, refugees, immigrants, and indigenous communities is strengthened, while racial, economic, gender, and social inequities are addressed and mitigated.</li> </ul>	

Commenter	Comment Number	Comment Text	Response
Puget Sound Sage	3	<p><b>**II. Equitable Growth **</b></p> <p>Equitable growth can only occur if the benefits of that growth are shared. The DEIS assumes that increased transit and increased density will automatically lead to better outcomes for low-income households and people of color. While PSRC has acknowledged that potential displacement impacts are difficult to model, we argue that the effect of displacement will be large enough to undermine the overall modeling that forms the basis for comparison between alternatives.</p> <p>A problematic assumption in the growth projections is that households that are currently transit reliant will have the same access to transit in the future. However, a combination of public investments and density policy are currently displacing people of color and low-income communities farther away from transit, work, and their cultural and community centers, resulting in less access to transit, increased vehicle miles traveled, and increased carbon emissions. This has both an impact on the overall jobs housing balance analysis and any equity assessment. For example, under Alternative 2, PSRC estimates that 23% of the growth will take place in areas at risk of displacement – making displacement an unavoidable consequence. We urge PSRC to identify some sort of modeling of displacement to improve accuracy – or at least the range – of impact to our jobs-housing balance. Such displacement projections could show that without mitigation, such investments could do net harm to communities of color and low-income communities.</p> <p>Other problems include:</p> <ol style="list-style-type: none"> <li>1. As the DEIS notes, if we direct regional growth to HCT Communities and restrict growth in other areas, demand for land, housing and commercial space will increase in HCTCs. As a result, lower income households, which are disproportionately people of color, will be pushed to lower density cities with lower transit capacity. However, not all cities currently accommodate low income households and people of color. Suburban cities with exclusive zoning, such as restricting apartment buildings and mostly single-family zoning, will create significant barriers for people displaced from HCTCs. This will result in only a few low-density cities bearing the impact.</li> <li>2. While the DEIS finds that on average, people will drive shorter distances, spend less time commuting, and have access to more jobs, an equity analysis requires more than an assessment for a hypothetical average, but specific outcomes for low-income households and people of color. As we are observing gentrification and displacement along the light rail in the Rainier Valley, it seems short-sighted to assume that everyone will benefit from transportation infrastructure equally and gauge mitigations based on those assumptions.</li> <li>3. The DEIS also assumes that merely creating jobs in an HCTC will economically benefit people of color and low-income households. Growth patterns are only one factor in access to living wage jobs. Policy is needed in HCTCs that support access to jobs by people marginalized in the labor market, including; priority hiring of women, people of color and people with disabilities; job training and apprenticeships; workplace democracy; and community-benefits agreements that improve job quality.</li> </ol>	<p>Equity and diversity are key goals in VISION 2050 as stated in the introduction: "All people can attain the resources and opportunities to improve their quality of life and enable them to reach their full potential. The region's diversity continues to be a strength. People from all backgrounds are welcome, and displacement due to development pressure is lessened." Socio-demographic models cannot forecast displacement and the SEIS does not assume that populations will remain in place. The Final SEIS further clarifies that the equity geographies are based on current demographics. The purpose of identifying these areas is to estimate how existing populations may be impacted by growth and change, and by extension, how future populations could be as well. Additional qualitative information on displacement trends and the impacts of displacement has been added to the SEIS. The SEIS discloses that all alternatives allocate growth to areas with higher displacement risk and could result in displacement. Measures to mitigate for displacement are needed and are recommended in the SEIS. These mitigation measures are implemented through multicounty planning policies and actions in VISION 2050, such as the development of a regional equity strategy (see Regional Collaboration section) and policies to avoid and mitigate for displacement (see Development Patterns and Housing sections). VISION 2050 includes policies and actions to support equity and affordable housing throughout the region. VISION 2050's Economy policies support women- and minority-owned businesses and the creation of living wage jobs and high-quality education and training programs to create widely shared prosperity.</p>
Puget Sound Sage	4	<p><b>**III. Environmental Justice Analysis **</b></p> <p>We appreciate PSRC's efforts over the last several years to do equity analyses, define "equity geographies," and to map displacement risks. We strongly believe that addressing impacts to environmental justice communities will improve conditions for everyone. However, the DEIS does not adequately study which communities experience the most disparity in outcomes from regional growth. Rather than use a simple grouping of areas with a higher share of low-income households or higher share of people of color, we urge PSRC to look at a combination of race, income, and existing environmental exposure and proximity to toxics and pollution.</p> <p>Puget Sound Sage recommends that PSRC (1) employ the Washington Environmental Health Disparities Map (<a href="https://fortress.wa.gov/doh/wtn/WTNIBL/">https://fortress.wa.gov/doh/wtn/WTNIBL/</a>) to identify communities facing greater burdens of environmental health risks in their analysis, (2) combine this analysis with a displacement risk map to identify all communities being forcibly at risk of being forced away from their communities, and (3) factor in forecasted climate impacts to the region. Combining all of these factors, PSRC should then adjust growth, develop policy, and prioritize resources to ensure that these most vulnerable communities are not bearing the burden of environmental harms, climate impacts, or displacement pressures, but that planning, policies, and resources are instead being deployed to mitigate environmental harm, climate impacts, and displacement pressures.</p> <p>In part because of how PSRC defines equity geographies, we also disagree with PSRC's findings that (1) proposed mitigation strategies are sufficient to mitigate environmental injustice and displacement and that (2) there is no difference in outcomes for communities of color, low-income communities, refugees, immigrants, and indigenous communities between growth alternatives proposed. PSRC's premise that "none of the alternatives are anticipated to result in disproportionately high and adverse effects on people of color and people with low incomes" ignores the ongoing reality that communities of color, low-income households, refugees, immigrants, and indigenous communities are already living with disproportionate harm and adverse effects from historic and ongoing systemic barriers to prosperity. If the region does not actively address these harms in their growth plans and proposed policies, they will continue to disproportionately harm communities of color, low-income communities, refugees, immigrants, and indigenous communities.</p> <p>We also believe that the proposed mitigation measures are insufficient, and must go beyond outreach and supporting the development of affordable housing infrastructure to include: (1) the reduction and mitigation of pollution associated with transportation and infrastructure development and (2) the investment of money, resources, and infrastructure into communities -- in a manner that is guided and led by communities -- disproportionately impacted by transportation-related pollution, climate-impacts, toxics exposure, gentrification and displacement.</p>	<p>Information on health disparities has been added to the SEIS Environmental Justice section. Given the regional scale of alternatives and the large variations in conditions among local areas, the level of detail for the alternatives and environmental analysis has been conducted at a broad programmatic scale. Analysis at the local level is beyond the scope of the SEIS. Localized impacts of growth could vary and would depend on more specific actions that would be considered during project-level environmental review. Additional mitigation measures have been added to the Environmental Justice chapter of the SEIS. See previous response for provisions on equity and displacement in VISION 2050.</p>
Puget Sound Sage	5	<p><b>**IV: Transit Focused Growth **</b></p> <p>As currently studied, all three of the alternatives will result in different burdens of harm borne by impacted communities. However, Alternative 2 offers the best of the three by encouraging a transportation system that reduces reliance on single occupancy vehicles; reduces vehicle miles traveled; invests in mobility options provided by our public transportation system; invests in walking and biking infrastructure; and eliminates our use of fossil fuels in the transportation sector. By 2050, we cannot be emitting carbon into the atmosphere and we need to start planning for a future in which we do not rely on fossil fuels to get around. By this measure, Alternatives 1 and 3 fail more than Alternative 2. That said, we want to emphasize that the underlying strategies and analysis for Alternative are not adequate to fully understand the true impacts of projected growth patterns.</p>	<p>Comments and preference for the Transit Focused Growth alternative over other alternatives have been acknowledged.</p>

Commenter	Comment Number	Comment Text	Response
Puget Sound Sage	6	<p><b>**V. Additional Mitigations **</b></p> <p>In order to strengthen any alternative PSRC chooses, we recommend the following mitigations be included in the final EIS and in Vision 2050 itself.</p> <ol style="list-style-type: none"> <li>1. Set housing affordability targets for all jurisdictions, especially ones designated as low density and high opportunity areas.</li> <li>2. Study, encourage, and fund policies and programs that prevent displacement from HCT Communities, such as community-driven development, inclusionary housing, equitable zoning overlays, tenant protections, and commercial stabilization for small, culturally serving businesses.</li> <li>3. Study, encourage, and fund policies and programs that ensure low-income households and people of color can access high-quality jobs to ensure that a better jobs-housing balance actually creates equity benefits. These include including priority hiring of women and people of color; job training and apprenticeships; workplace democracy; community-benefits agreements; and accessibility.</li> <li>4. Study, encourage, and fund policies and programs that ensure low-income households and people of color are resilient to climate change impacts, such as flooding, smoky air, and weather events.</li> <li>5. Begin to track patterns of displacement of low-income households and people of color out of HCT Communities to include in all of PSRC's planning processes.</li> <li>6. Analyze of all PSRC cities' and counties' zoning codes to identify exclusionary practices that prevent moderate density and affordable housing from being built. Then craft a set of zoning standards that jurisdictions must adopt until they reach affordable housing targets.</li> <li>7. Increase enforceability of PSRC growth policies and mitigations, such as housing targets, Center City designations, and the Growing Transit Communities Compact, with increased consequences.</li> <li>8. Provide smaller jurisdictions additional planning funds to address environmental/climate impacts from growth and to plan for increased density and affordability.</li> </ol> <p>Thank you for your time and attention.</p> <p>Sincerely, Giulia Pasciuto, Equitable Development Policy Analyst Katrina Peterson, Climate Justice Program Manager</p>	Additional mitigation measures have been added to the Housing section and Environmental Justice chapter.
Puget Sound School Coalition - King County Component	1	<p>Re: Comments- Vision 2050 Draft Supplemental Environmental Impact Statement</p> <p>Dear Puget Sound Regional Council:</p> <p>The King County Component of the Puget Sound School Coalition 1 (the "School Coalition") submits these comments on the Vision 2050 draft Supplemental Environmental Impact Statement ("DSEIS"). The comments below follow the School Coalition's March 19, 2018 comments submitted during the scoping period (the "School Coalition Scoping Comments").</p> <p>The School Coalition is particularly concerned with how Vision 2050 will direct mitigation for schools and school facilities needed to address the impacts of 1.8 million new residents to this region by 2050. Although the three alternatives analyzed in the DSEIS will impact individual school districts differently, the DSEIS correctly notes that each alternative will require new, expanded, or remodeled school facilities to serve projected growth. New development can uniquely affect school districts by increasing student enrollment and reducing land available for the schools needed to serve those students. Local planning can exacerbate these impacts by limiting the location and practical permitting of new schools.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS.
Puget Sound School Coalition - King County Component	2	<p>Among other things, the preferred alternative must include mitigation strategies to ensure adequate land and efficient permitting tools for siting schools.</p> <p>The School Coalition acknowledges two of the DSEIS' s proposed mitigation measures applicable to schools, identifying opportunities for shared facilities and proactive planning collaboration between jurisdiction and school districts, as effective and practical solutions if properly followed and implemented. As noted in the School Coalition Scoping Comments, it is critical that cities and counties have incentive to work collaboratively with school districts to address siting and capacity issues in a practical manner. In some instances, private development [1 The King County Component of the Coalition includes the Issaquah, Lake Washington, Northshore, Riverview, Snoqualmie Valley, and Tahoma School Districts.] is prioritized over public school facility needs or school projects are held to more onerous and costly standards. To facilitate meaningful proactive collaboration, the SEIS and Vision 2050 should recognize more specific mitigation measures, such as:</p> <ul style="list-style-type: none"> <li>-Prioritizing school district purchase of surplus governmental property;</li> <li>-Preserving adequate land in anticipated growth areas at a reasonable cost for school infrastructure;</li> <li>-Regularly reviewing and updating local regulatory approaches, including code requirements and permitted uses in zones, with the intent to facilitate and prioritize the siting of schools;</li> <li>-Pursuing opportunities for shared use of public property;</li> <li>-Increasing local investment in off-site public infrastructure to support the location of a school needed to serve permitted growth; and</li> <li>-Ensuring that new residential development pays its fair share of the cost of the school capacity needed to support the permitted growth project.</li> </ul> <p>These more specific mitigation measures would recognize the GMA's expressed shared planning responsibilities and further facilitate delivery of schools needed to support the preferred growth alternative.</p> <p>As noted in the School Scoping Comments, the reassessment of school boundaries is neither an appropriate nor effective mitigation measure. School district boundaries may only be altered by a transfer of territory, the consolidation of one or more school districts, or the dissolution or annexation of all or part of a district. 2 Even in those limited circumstances, the reassessment of school boundaries is subject to a complex and extensive process that requires consideration of a multitude of factors. 3 Those concerns aside, this mitigation measure would not be effective in addressing growth because students would merely be shifted from one overcrowded school district to</p>	Suggested mitigation measures have been added to the Public Services section.

Commenter	Comment Number	Comment Text	Response
		<p>another, without addressing the underlying issue. That is avoidance, not mitigation. Individual school districts already regularly reassess internal school service area to balance growth within the system as it occurs. If this is the intent of the mitigation measure included in the DSEIS, it should be so clarified.</p> <p>Under all three alternatives, new growth will occur under conditions where new school sites are currently difficult and in some cases impossible or prohibitively expensive to locate. As such, Vision 2050 should include a requirement for planning jurisdictions to provide in a substantive and meaningful manner for school facility needs when updating countywide planning policies and comprehensive plans.</p> <p>We appreciate the opportunity to submit these comments and look forward to continued participation in the Vision 2050 process.</p> <p>2 RCW 28A.315.045. 3 RCW 28A.315.205.</p> <p>Sincerely, PACIFICA LAW GROUP LLP Denise L. Stiffarm</p>	
Sierra Club Washington	1	<p>Thank you for the opportunity to contribute to the VISION 2050 process. The Sierra Club considers such planning key to ensuring a sustainable future for our region. In March 2018 the Sierra Club, along with Transportation Choices, Puget Sound Sage, Futurewise, Forterra, OneAmerica, and Cascade Bicycle Club submitted a set of comments on VISION 2050 Scoping. We collectively asked for:</p> <ul style="list-style-type: none"> <li>• Emphasis on policies on health, equity, and the environment.</li> <li>• Focus on action items and implementation of the VISION.</li> <li>• Use of specific targets and performance metrics to measure success.</li> </ul> <p>The draft SEIS embraces many of these approaches in a fair and equitable manner.</p> <p>The “Transit Focused Growth” alternative provides many desired outcomes as it:</p> <ul style="list-style-type: none"> <li>• Focuses growth in the Metropolitan Cities, Core Cities, and high-capacity transit (HCT) communities.</li> <li>• Provides for compact growth near the region’s existing and planned transit investments.</li> <li>• Assumes a greater role for areas served by high-capacity transit outside of Metropolitan and Core Cities.</li> <li>• Results in lowest growth in rural areas and unincorporated areas without access to high-capacity transit.</li> </ul> <p>However, we have an overriding concern about the scope of the alternatives. Although the PSRC has evaluated quite well the pros and cons of the alternatives selected, all three fall short of what the region needs to attain by 2050 to minimize the impacts of adding 1.8 million people (and 1.2 million new jobs) to our region’s ecosystems. We face a considerable challenge dealing with such growth including increased development, reduction in land cover, more transportation infrastructure, and decreased habitats. Consequently, we see VISION 2050 as but a step in what should be a continuous planning exercise, as conditions often change and in directions not always foreseen.</p> <p>We understand the basis for the population/job projections provided. However, we believe such long-term projections (out to 2050) need to address some of the more atypical scenarios that possibly will become typical—all related to the far-reaching impacts of human-accelerated Climate Change and degradation of vital ecosystems. As we enter a period of greater uncertainty, our region needs to look at additional growth scenarios where there is a divergence among population, jobs, and economic growth. Such a divergence could happen with an influx of climate refugees, a gradual erosion of conventional economic growth (and urbanization), or a changing mix of job types and standards of living. Consequently, we need to recognize such scenarios and plan for unexpected setbacks by building in resilience.</p> <p>The magnitude of challenges the region faces with the backdrop of climate change leads us to characterize the Transit Focused Growth alternative as inadequate, while still clearly preferring it to the other studied alternatives. The need for adaptive learning, feedback improvements, and resilience in the face of uncertainty are key principles that need to inform the VISION 2050 planning process into the future.</p> <p>We offer detailed comments on many sections of the VISION 2050 Supplemental EIS in the subsequent pages of this correspondence. Thank you for your consideration.</p> <p>Sincerely, Tim Gould Chair, Transportation and Land Use Committee Sierra Club Washington Chapter</p> <p>However, we have an overriding concern about the scope of the alternatives.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The Sierra Club’s preference for the Transit Focused Growth alternative, as well as concerns about the alternatives, have been acknowledged.</p>

Commenter	Comment Number	Comment Text	Response
Sierra Club Washington	2	<p>Executive Summary</p> <p>Alternatives evaluated in this SEIS</p> <p>The new PSRC “Regional Geographies” system used to classify an area by what role it plays in the greater region is an important concept. We lend our support as it:</p> <ul style="list-style-type: none"> <li>Defines different geographies by their contribution to the region;</li> <li>Recognizes the importance of High-Capacity Transit Communities; and</li> <li>Continues to identify the differences among Cities &amp; Towns, Urban Unincorporated Areas, Rural Areas, Resource Lands, and Governmental Properties such as Military Installations.</li> </ul> <p>Such a system should filter down to the County and City planning exercises.</p> <p>Three alternatives are identified:</p> <p>“Stay the Course” — If we were to continue along the same lines as we are now, it would not allow us to meet State and King County Climate goals.</p> <p>“Transit Focused Growth” — This appears to be the best option for planning our future to ensure long-term sustainability.</p> <p>“Reset Urban Growth” — Such a scenario would be highly detrimental to the region’s ability to meet climate goals and worsen its environmental footprint, possibly permanently.</p> <p>Comparison of Alternatives The comparison tables and figures are very useful in helping to evaluate the pluses and minuses of each alternative.</p> <p>Table ES-1. Summary Comparison of Alternatives to Stay the Course provides a direct comparison in terms of growth patterns among the newly defined “Regional Geographies”.</p> <p>The “Transit Focused Growth” alternative shows higher population in the High-Capacity Transit Communities.</p> <p>However, it also shows that High-Capacity Transit Communities essentially act no differently in terms of employment growth, as all three alternatives show ~12 - 13% shares—we question this finding.</p> <p>Table ES-2. Impacts Common to All Alternatives shows many negative impacts associated with all three alternatives, which must be minimized or eliminated, such as:</p> <ul style="list-style-type: none"> <li>Land-Use: “... lower-density land uses and potential development pressures on natural resource lands”</li> <li>Transportation: “... congestion each year is forecast to increase”</li> <li>Habitat Degradation: “... adverse impacts to ecosystem resources such as fragmentation and degradation of habitat”</li> <li>Water Quality: “... alter stormwater hydrology, reduce aquatic habitat, and degrade water quality”</li> <li>Open Space: “... degradation of the recreational experience, potential degradation of natural and open space resources, and increased conflicts between users”</li> </ul> <p>Table ES-3. Summary Comparison of Alternative Impacts clearly shows there would be very different environmental impacts among the three alternatives.</p> <p>We find the “Transit Focused Growth” alternative provides least impacts across the board for each category (“Topic”) of the three alternatives.</p>	Comments noted.
Sierra Club Washington	3	<p>1. Introduction</p> <p>Given the rapid growth in the region over the past few decades and the expected growth in the coming decades, an update to the VISION 2040 (adopted in 2008) is appropriate and necessary to ensure such growth can be accommodated sustainably for both our shared environment and our quality of life. Key to this effort will be robust measures to track progress in meeting identified goals for the region.</p> <p>The Growth Management Policy Board (GMPB) identified a set of good objectives (pp. 4-5) for the Regional Growth Strategy that we fully support. All of the outcomes the GMPB identified (p. 5) are important and should be met, but we especially are concerned our region takes meaningful steps to:</p> <ul style="list-style-type: none"> <li>Reduce greenhouse gas (GHG) emissions.</li> <li>Restore, protect, and sustain our natural environment.</li> <li>Ensure a safe, clean, integrated, affordable, and highly efficient multimodal transportation system.</li> </ul>	Comments acknowledged.
Sierra Club Washington	4	<p>2. Affected Environment</p> <p>While we generally agree with the list of “... some of the key regional changes in the last decade?” (p. 10), we would like to see the SEIS recognize some concerns here:</p> <ul style="list-style-type: none"> <li>* “Tech industry employment is experiencing rapid growth, particularly in Seattle and central King County” Comment: This has been a good trend, but is it sustainable and is such geographic concentration good for the region?</li> <li>* “Job growth has been strong in recent years but has been uneven across the region and between industries” Comment: This is one of the underlying issues that must be addressed as it directly adversely affects our transportation infrastructure and environment, as well as any hope of reducing our GHG emissions.</li> <li>* “Population and housing growth is continuing at a rapid pace” Comment: This is not sustainable without proper regional and local planning and, even then, might be overwhelming if addressed in a piecemeal fashion. Attention is needed for a better housing-jobs balance throughout the region.</li> <li>* “Regional demographics are changing as the population is becoming older and more racially and ethnically diverse” Comment: This is both challenging (i.e., “older”) and good (i.e., “diverse”), especially for the economy.</li> <li>* “Rent and home prices have been increasing dramatically, causing a crisis of housing affordability” Comment: This will continue to be a growing dilemma that requires real solutions that are lasting, otherwise progress made in other areas, such as the environment, will be eroded.</li> </ul>	Comments acknowledged.

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		<p>* "Transit infrastructure around the region is expanding, and transit ridership is increasing" Comment: This is true, but woefully deficient to address the magnitude of current day problems and those that will multiply and face the region in the coming decades.</p> <p>* "Climate change is of growing urgency, and intersects with many resources including air quality, ecosystems, and water" Comment: This is the "elephant in the room" and intersects with every other issue, such that it is how success or failure will be measured.</p> <p>We find PSRC's efforts herein to identify and qualify changes since VISION 2040 good. Below we provide comment to flag some key areas of concern we believe our region must confront over the next three decades in order to assure a sustainable future.</p>	
Sierra Club Washington	5	<p>2.1 Population</p> <p>A major concern as the region continues to grow is where that growth goes. In the past too much of that growth has dis-proportionally gone to small, suburban cities that has perpetuated sprawl and created intolerable morning and evening traffic jams on every major arterial in King County. In the future, to be sustainable, such growth must be funneled to the major urban areas and regional growth centers.</p>	Comments acknowledged.
Sierra Club Washington	6	<p>2.2 Employment</p> <p>While charts like Figure 2.2-2 (p. 15) show employment increases over the past decade throughout the region, most of the higher paying jobs are concentrated in Seattle, Bellevue, and other wealth-of-opportunity cities causing intolerable commutes for people who simply cannot afford to live in or close to those cities. Table 2.1-1 (p. 16) supports this assertion. A better balance of high-opportunity jobs relative to regional housing is needed to enable more residents access to these higher paying jobs.</p>	Vision 2050 supports improved jobs-housing balance through the Regional Growth Strategy and provisions in the Development Patterns, Housing, and Economy sections.
Sierra Club Washington	7	<p>2.3 Housing</p> <p>The issue of housing and rental costs will remain an important issue throughout the region in the coming decades. Figure 2.3-4 (p. 21) paints a depressing story, as the trends of reductions in the Housing Affordability Index show no signs of abating. While we recognize the importance of maintaining a "Jobs-Housing Balance," few communities achieve same and the problem appears to be getting worse.</p>	VISION 2050 addresses this issue through policies and actions in the Housing section, including the development of a regional housing strategy.
Sierra Club Washington	8	<p>2.4 Land-Use</p> <p>2.4.2 Regional Growth Centers and Manufacturing/Industrial Centers</p> <p>The designation of both RGCs and M/ICs helps both short- and long-range planning efforts at all jurisdictional levels. However, we question whether or not such centers are taking sufficient growth as evidenced by the percentages—both the totals and the changes from the year 2000—provided on p. 28. In reviewing Figure 2.4-4 (p.29) it is evident that several RGCs are not along major transit lines and, thus, provide insufficient transportation options for commuters who work in them.</p> <p>2.4.3 Transit-Oriented Development</p> <p>This section is a welcome addition. Transit-Oriented Development (TOD) must be a key concept in our regional and local planning to help us meet our GHG-emission goals and make best use of limited transportation monies. Full build out of Sound Transit's Light Rail lines, along with continued addition of other mass transit options and connecting local services, must remain the region's focus to make the best use of TOD.</p>	Comments acknowledged.
Sierra Club Washington	9	<p>2.5 Transportation</p> <p>2.5.1 Transportation System Capacity Improvements Transit</p> <p>We applaud that transit agencies develop or update their own long-range transit plans, resulting in a "robust transit network throughout the region." A key factor in success of these efforts is to improve integration among transit systems, so the user can experience a seamless system not dependent on the paint scheme of the transit vehicle ridden.</p> <p>Active Transportation</p> <p>We fully support the "regional bicycle network and pedestrian networks to designated regional centers and transit station areas as a framework for regional and local nonmotorized transportation planning and investment." Further incentive or encouragement for local plans and investments to expand bicycle and pedestrian networks will be essential to create human-scale communities where residents can easily reach employment, services, cultural and recreational attractions in a low impact manner. Implementation of more active transportation facilities will require explicit prioritization at the local level throughout the region.</p> <p>Roadway Systems</p> <p>While we support PSRC's 2018 Regional Transportation Plan, we remain wary of adding "capacity improvements" that include simply paving more lane-miles. Transportation options, and more efficient use of existing roadway capacity via an innovative set of transportation-demand-management strategies, must be the focus of our regional, county, and city planning efforts.</p> <p>Ferry</p> <p>Increased ferry service capacity, especially use of more passenger ferries to connect major urban centers with proximate marine terminal access, can play a very important role in moving people throughout the region with reduced climate footprint.</p> <p>Regional Aviation System</p> <p>The difficulty in reducing the climate footprint of aviation may require a rethinking of the advisability of increasing capacity of the regional air transportation system. Other forms of transportation appear better suited to conversion of conveyance vehicles to electric or biofuel propulsion. Planning for future airport capacity needs should include joint civilian-military operations at McChord Field and use of the Grant County International Airport in eastern Washington for intercontinental service along with land-based connections to central Puget Sound.</p>	Comments noted.

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		<p>Intercity Passenger Rail and Bus Service</p> <p>The role of intercity passenger rail to help reduce the congestion, energy use, and environmental impacts of highways deserves greater attention and resources. While primarily a State role, PSRC should be an active partner in efforts to bring electrified rail to regional corridors, which could reduce the environmental impact of regional commuter rail service. The Seattle-Portland corridor and its regional components could follow an expansion path similar to that outlined in the Solutionary Rail plan (<a href="http://www.solutionaryrail.org/srvideo">www.solutionaryrail.org/srvideo</a>).</p> <p>Freight</p> <p>Investments in the transportation system to increase freight capacity need to be carefully and strategically located and designed so as not to encourage sprawl development that would run counter to the preferred Transit Focused Growth strategy alternative for VISION 2050. Plans should consider freight only or freight traffic preference highway lanes where these capacity investments are identified.</p> <p>Greater emphasis on freight rail for longer distance cargo routes as an alternative to long-haul truck traffic should be a plan priority. Electrified rail corridors for both freight and passenger use in a form such as that presented in the Solutionary Rail plan (<a href="http://www.solutionaryrail.org/srvideo">www.solutionaryrail.org/srvideo</a>) should be part of future freight planning.</p> <p>2.5.2 Transportation System Efficiency Improvements</p> <p>Transportation demand management “promoting alternatives to driving alone, shifting trips out of peak travel periods, or eliminating the need for trips” must remain our focus going forward, as it is the only way to make the best use of our transportation infrastructure, save monies in the long run, and protect our shared environment, as well as reduce GHG emissions.</p>	
Sierra Club Washington	10	<p>2.6.2 Greenhouse Gas Emissions and Climate Change</p> <p>The Sierra Club continues to work with various governmental agencies in seeking solutions to meet their GHG-emission reduction goals. That said, having such varied goals among agencies simply is not productive. However, our biggest concern is that none of the goals of any of the agencies are strict enough to avoid the worst effects of climate change.</p> <p>Figure 2.6-2 (p. 42) shows that in 2015 over a third of the region’s GHG emissions are sourced from vehicles (most of those passenger vehicles) on our roads. This share most likely is higher now as many more vehicles are on the roads. It is here we must concentrate much of our efforts by making commuting much more efficient and single-occupant vehicles much less attractive.</p>	Comments noted. VISION 2050 contains policies and actions related to reducing single occupant vehicle travel.
Sierra Club Washington	11	<p>2.7 Ecosystems 2.7.3 Relevant Plans, Studies, and Court Rulings</p> <p>While we applaud the ecosystem preservation and restoration plans that have been developed, the dearth of funding to implement same has made many moot, shelfbound strategies, which, all too quickly, become out of date. Meanwhile, ecosystems continue to be threatened by ever-growing development pressures.</p> <p>2.7.4 Climate Change</p> <p>The overarching and severe affects of climate change continue to worsen and our response has continued to fall further and further behind what is needed to ensure the long-term health of our critical ecosystems. Without major policy changes at all levels of government, we will not be able to make any meaningful levels of progress in ecosystem preservation and many restoration efforts will fail.</p>	Comments noted. See VISION 2050's Environment and Climate Change sections for provisions to address these issues.
Sierra Club Washington	12	<p>2.8 Water Quality and Hydrology</p> <p>2.8.1 Impervious Surfaces</p> <p>While the total acreage of impervious surfaces throughout the region shown in Table 2.8-1 and mapped in Figure 2.8-2 is informative, we suggest the analysis of impervious surfaces focus on their location relative to groundwater recharge zones and domestic water supply wells. Stormwater management conditions and potential for upgrades relative to the location of impervious surfaces are important to inform land use plans.</p> <p>2.8.2 Climate Change and Sea Level Rise</p> <p>“Water resource managers and planners must plan for new risks and vulnerabilities that may not currently be managed within existing practices” is an example of the need for greater resilience to deal with climate change impacts in plans and practices informed by the VISION 2050 update.</p> <p>2.8.3 Policies and Regulations</p> <p>The watershed planning and standards for new domestic water use and fees for building a permit-exempt well under the new streamflow restoration law may not prove to be adequate to maintain in-stream flows during dry periods in the hydrologic cycle in stressed watersheds. Salient issues in the Hirst State Supreme Court decision may present recurring problems over water resource use and management due to inadequacies in the streamflow law and implementation. A drill first, mitigate later approach will not provide sufficient in-stream flows.</p>	See response to previous comment. Development projects will be reviewed at the local level and be subject to applicable regulations and local planning.
Sierra Club Washington	13	<p>2.9 Public Services &amp; Utilities</p> <p>New capital facilities and maintenance of existing utility systems and public services will be less expensive, more efficient, and result in fewer environmental impacts under a Transit Focused Growth alternative for VISION 2050 compared with the other studied alternatives. The synergy of dense urban growth and lower expense public services and utilities cannot be overemphasized.</p>	Comment acknowledged.

Commenter	Comment Number	Comment Text	Response
Sierra Club Washington	14	<p>2.10 Parks &amp; Recreation</p> <p>Sierra Club strongly supports an increased emphasis on access to green space, particularly natural areas. We do not feel support for urban green space is at all at odds with policies promoting more urban density. Convenient access to urban green space should be accessible for the benefit and health of residents; studies show greater health benefits in populations that have historically not enjoyed such access, including low-income populations and communities of color. In short, access to green space is an equity issue. We support efforts to add more residential density near parks in predominantly single-family land use areas.</p> <p>2.10.6 Climate Change</p> <p>We wish to emphasize that open space preservation and expansion are critical to not only fighting climate change, but helping ecosystems adapt to a changing climate. The role of forests, forest soils, agricultural soils, estuaries, and wetlands in storing carbon must be highly considered in management of resource lands.</p>	Comments acknowledged.
Sierra Club Washington	15	<p>2.11 Environmental Health</p> <p>2.11.1 Contamination and Pollution</p> <p>Cleanup of contaminated sites is an important step to facilitating more vibrant, compact urban neighborhoods consistent with the Transit Focused Growth alternative. PSRC should explore policy and regulation adjustments that can hasten the cleanup of contaminated sites according to standards that will accommodate a variety of repurposed uses for these sites.</p>	The VISION 2050 Development Patterns section contains a policy and action to support the clean up of contaminated sites.
Sierra Club Washington	16	<p>2.12 Energy</p> <p>Figure 2.12-1 (p. 65) clearly shows that the increasing concern facing the region is the energy consumption of the transportation sector--the only trend line going up through 2016. New data when available for 2017, 2018, and 2019 surely will show that trend increasing even more. This rising energy use, along with the traffic congestion that causes it, is and will continue to be one of the biggest challenges for which the region must make significant progress.</p>	Comments acknowledged.
Sierra Club Washington	17	<p>2.16 Noise</p> <p>While noise sources in the urban environment may have increased with regional growth, the use of new materials and emerging technologies can help to mitigate the impacts of noise in urban areas.</p>	Comment acknowledged.
Sierra Club Washington	18	<p>2.17 How Has the Regulatory Setting Changed Since VISION 2040?</p> <p>Countywide planning policies and local comprehensive plans have been updated to be consistent with VISION 2040, but the effect of these updates is only now beginning to be experienced. Quicker implementation of VISION 2050 policies along with evaluation and feedback mechanisms to ensure the policies are followed and having desired effects will be needed.</p>	Comments acknowledged.
Sierra Club Washington	19	<p>3. Alternatives Evaluated</p> <p>Since the Growth Management Act requires each of the four counties (in consultation with their cities) to adopt Growth Targets out 20 years, there should be continuous monitoring of progress to ascertain how the region is faring in meeting those targets. With the projections of adding 1.8 million more people to the region by 2050, this is even more imperative. Such metrics should be clear to understand and made publicly available.</p> <p>While some cities will meet their targets, and some fall short, we should not be complacent that these simply "cancel each other out," because, where growth goes is possibly even more important. This is especially true where there is insufficient infrastructure available to accommodate such growth.</p> <p>3.1 How the Alternatives Were Developed</p> <p>3.1.1 Process for Developing Alternatives</p> <p>The Sierra Club strongly supports the State Growth Management Act's "...objectives of containing the expansion of urban areas; conserving farmlands, forests, and open spaces; supporting more compact, people-oriented living and working places; and focusing a significant amount of new employment and housing into cities with vibrant urban centers" (p. 78) and its use as the basis to inform VISION 2050's plan to accommodate the expected large growth in both people and jobs.</p> <p>3.1.2 How Regional Growth Was Allocated</p> <p>While we are generally supportive of the modifications to the regional geography classification system, Sierra Club does have some concerns about the implementation of this geography classification system as presented in Table 3.1-2 Description of Regional Geographies.</p> <p>The inclusion of Arlington under HCT Communities is misplaced, as it would more appropriately be classified in the Cities &amp; Towns category. Instead of the long, narrow extension of HCT Communities land northeast to Arlington illustrated in Figure 3.1-1, a separation of categories between Marysville and Arlington is more appropriate since the designated urban growth area was initially too large encompassing lands better classified as resource or rural.</p> <p>The cities of Beaux Arts, Clyde Hill, Hunts Point, Medina, and Yarrow Point would all be better classified as HCT Communities and be required to take more growth and density. Beaux Arts will soon have proximate access to light rail service via the South Bellevue Station, while the other four cities are near to express bus access along the SR 520 corridor, which we hope to see one day upgraded to light rail service for a line connecting Ballard, University District, South Kirkland, and Redmond. Parts of Clyde Hill are within walking distance of major commercial centers in Metropolitan City Bellevue. The classification of these five suburban cities as Cities &amp; Towns appears to be an attempt to prevent more residential density from occurring there, which we find to be an elitist and unacceptable affront to efforts to create more equitable housing options in geographies with favorable location and infrastructure that can support more such growth.</p>	Comments acknowledged. An action has been added to VISION 2050's Regional Collaboration section to track the implementation of VISION 2050 through monitoring and periodic evaluation.
Sierra Club Washington	20	<p>3.2 Stay the Course (No Action Alternative)</p> <p>Although the "no action alternative" extends the regional growth strategy of VISION 2040, which focused growth in a "compact growth pattern," it has resulted in ever worsening traffic congestion and housing affordability. The region cannot afford to "stay the course."</p>	Comment acknowledged.

Commenter	Comment Number	Comment Text	Response
Sierra Club Washington	21	<p>3.3 Transit Focused Growth Alternative</p> <p>The strongest rationale for the region’s future growth strategy is offered here with the: “...explicit goal for 75 percent of the region’s population and employment growth to occur within regional growth centers and within a quarter-mile to a half-mile from current and planned investments in high-capacity transit, including light rail, bus rapid transit, commuter rail, ferries, and streetcar. This would result in the largest shares of growth to Metropolitan Cities, Core Cities, and HCT Communities” (p. 88). This possibly is the only solution to sustainably accommodate the anticipated growth in the region.</p>	The Sierra Club’s preference for the Transit Focused Growth alternative has been acknowledged.
Sierra Club Washington	22	<p>3.4 Reset Urban Growth Alternative</p> <p>This “reset urban growth” alternative, as with the “stay the course” alternative, would fail our region and must not be either of the paths we take.</p>	Comment acknowledged.
Sierra Club Washington	23	<p>3.5 Alternatives Comparison</p> <p>The information presented is very useful in understanding how the alternatives compare and could affect the region in the years to come. Such information further reinforces our belief that the “transit focused growth” alternative is the best of those evaluated by PSRC for our region moving forward.</p> <p>Unfortunately, we have major concerns that--while such regional planning is necessary-- there is still too much parochial behavior by the counties and their cities, i.e., there is a dearth of effective intergovernmental cooperation, although required by the State Growth Management Act. Without such cooperation and with few effective enforcement mechanisms in place (e.g., transportation concurrency is not enforced, especially between jurisdictions), it will be hard to ensure counties and cities conform to and successfully implement and execute key aspects of the regional plan.</p>	VISION 2050 supports improved regional coordination through the many provisions in the Regional Collaboration section and other sections.
Sierra Club Washington	24	<p>4. Environmental Effects and Mitigation</p> <p>4.1 Population, Employment, and Housing</p> <p>4.1.1 Analysis of Alternatives</p> <p>4.1.1.1 Impacts Common to all Alternatives</p> <p>At present, moderate-density housing tends to provide more affordable housing choices than either low- or high-density housing options. Mitigation policies put in place now and in the near future can ensure that adequate affordable housing choices exist in high-density housing land uses. Displacement or its potential should not be used as rationale for discouraging increased housing density. Complementary policies that reverse displacement and provide mitigation where it does occur will be needed to ensure the needs of households at all income levels can be met.</p> <p>4.1.1.2 Comparison of Alternatives</p> <p>Both Figures 4.1-1 and 4.1-2 [p. 100] show the clear advantages of the “Transit Focused Growth” alternative, which leads to both a good Job-Housing Index close to the regional average of 1.0 and more high-density, compact housing growth combined with the least low-density housing growth.</p> <p>4.1.1.3 Impacts of Stay the Course (No Action Alternative)</p> <p>Impacts presented indicate the “Stay the Course” alternative will further ingrain sprawl into regional planning, which would be the costliest and least sustainable path to take, which further reinforces the need to no longer stay the course.</p> <p>4.1.1.4 Impacts of the Transit Focused Growth Alternative</p> <p>A key advantage cited here is that high-density, compact housing growth improves across the board for all four counties and low-density housing growth is reduced— all as compared to the “Stay the Course” alternative.</p> <p>4.1.1.5 Impacts of the Reset Urban Growth Alternative</p> <p>We see many of the same negative characteristics here as with the “Stay the Course” alternative. Several indicators of environmental effects and sustainability are even worse than with “Stay to Course”.</p> <p>4.1.2 Cumulative Effects</p> <p>It is important to look at cumulative effects here, as all too often projects are approved in cities without much thought given to the overall cumulative impacts, even though SEPA requires same.</p> <p>On stemming the growth of climate change we fervently agree the region must tend towards more “compactness and density of new development,” as the transportation sector is one of the largest contributors to GHG emissions.</p> <p>4.1.3 Potential Mitigation Measures</p> <p>Housing and employment mitigation measures will no doubt be needed to ensure access to opportunity for all groups and to overcome imbalances in market power and rising inequality. We are especially favorable regarding these measures:</p> <ul style="list-style-type: none"> <li>• Prioritize regional funding for transportation projects that support affordable housing;</li> <li>• Rezone for increased density near transit and services;</li> <li>• Expand housing diversity, particularly moderate-density housing;</li> <li>• Invest in infrastructure that connects designated centers;</li> <li>• Use incentives and investments to create a closer balance between jobs and housing.</li> </ul> <p>4.1.4 Social Equity Considerations</p> <p>Low income housing incentives in close proximity to transit, active transportation networks, jobs, and environmental amenities will help maintain stable communities.</p> <p>4.1.5 Significant Unavoidable Impacts No comment.</p>	Comments acknowledged.

Commenter	Comment Number	Comment Text	Response
Sierra Club Washington	25	<p>4.2 Land Use</p> <p>4.2.1 Analysis of Alternatives</p> <p>4.2.1.1 Impacts Common to all Alternatives</p> <p>Of all the items listed in Section 4, Land Use is the most sensitive to jurisdictional laws, zoning rules, and enforcement of both. While adequate planning is necessary, it is not sufficient without adequate follow-up and continuity of local government administrations over time.</p> <p>4.2.1.2 Comparison of Alternatives</p> <p>We support the land-use assessment that the Transit Focused Development alternative would have the least impacts in terms of the three categories listed: “acres of developed land,” “proximity to transit,” and “proximity to the Urban Growth Boundary,” as shown in Figures 4.2-1 through 4.2-3 (pp. 110-111), respectively. It is important to recognize this also is true for each county, not just the region as a whole.</p> <p>4.2.1.3 Impacts of Stay the Course (No Action Alternative)</p> <p>No comment.</p> <p>4.2.1.4 Impacts of the Transit Focused Growth Alternative</p> <p>The major differences with the Stay the Course alternative listed are important:</p> <p>“More compact development patterns would be present near high-capacity transit throughout the region and Less development would occur in Cities &amp; Towns, Urban Unincorporated, and Rural geographies as well as in proximity to natural resource lands and critical areas.” However, we would add that the Transit Focused Development alternative also has the least impacts on the growth of GHG emissions and, thus, is best for combating climate change.</p> <p>4.2.1.5 Impacts of the Reset Urban Growth Alternative</p> <p>No comment.</p> <p>4.2.2 Cumulative Effects</p> <p>The challenges listed that jurisdictions face—and will continue to face—are real, but can be handled with proper planning and laws. However, if those same jurisdictions do not cooperate with neighboring jurisdictions, especially on infrastructure needs, as required by the State GMA, then such growth will not be efficiently accommodated and will drive the public away from supporting more growth to meet Growth Targets. History has shown us that the lag in infrastructure to support new growth is probably the most important concern raised by residents.</p> <p>4.2.3 Potential Mitigation Measures</p> <p>While the listed VISION 2040 FEIS mitigation measures all made sense (and still do), the track record on implementation of several is not good. We support the twelve new measures listed under the topic of “Urban Lands.” Considerable emphasis should be placed on the measures:</p> <ul style="list-style-type: none"> <li>• Provide amenities such as parks, plazas, trails, waterfront access, and cultural centers in denser areas to increase livability;</li> <li>• Incorporate design standards that enhance walkability and character;</li> <li>• Locate civic buildings in existing communities rather than in greenfield areas.</li> </ul> <p>4.2.4 Social Equity Considerations</p> <p>Tracking how low-income households and communities of color are served by increased transit, and how growth focused on such census tracts adds to the pressure of displacement will better inform cities and planning agencies of the need for targeted mitigation measures.</p> <p>4.2.5 Significant Unavoidable Impacts</p> <p>No comment.</p>	Comments acknowledged.
Sierra Club Washington	26	<p>4.3 Transportation</p> <p>Transportation is the defining issue against which all the alternatives ultimately must be measured. The Sierra Club has long been concerned with seemingly conflicting State policies on how to best evaluate performance of our transportation infrastructure. This tends to cause variation down the line as counties and cities conduct their own traffic-demand modeling, traffic-impact analyses, Concurrency testing, etc. Although the GMA calls for “intergovernmental coordination,” there appears to be little of same at the grassroots levels other than government officials serving on various transportation boards, associations, etc. Meeting together to declare “we all have our own problems,” doesn’t substitute for real coordination.</p> <p>Finally, mitigation, what little there is put in place, often is done in a piecemeal fashion (e.g., city by city, with little to no regional perspective) and, thus, almost never is adequate or timely. We see a much bigger role here for the PSRC to provide that “regional” perspective. Unfortunately, State laws would need to be changed to allow that to happen—other than the current regional planning responsibility that already is under PSRC’s purview.</p> <p>4.3.1 Analysis of Alternatives</p> <p>4.3.1.1 Impacts Common to all Alternatives</p> <p>The adopted Regional Transportation Plan (RTP) serves as an excellent step towards helping the region accommodate the expected increases in population and jobs by 2050. We especially support the RTP’s:</p> <p>“system of express toll lanes on the highway network”</p> <p>“substantial increases in high-capacity transit service”</p>	The suggested measure on transportation coordination has been added.

Commenter	Comment Number	Comment Text	Response
		<p>"peak/off peak road usage charge to replace the state gas tax"</p> <p>Unfortunately, each of these policies is needed now in 2019, not in 2050. It is hoped that by 2050 we will have already replaced the above policies with even better ones.</p> <p>4.3.1.2 Comparison of Alternatives</p> <p>While all the alternatives compare favorably to the 2014 baseline (except for increased congestion delays), we would expect to see much better performance some 36 years out to 2050. It appears we are aiming too low to truly address our transportation problems and whether or not we can develop and implement sustainable solutions for the region.</p> <p>4.3.1.3 Impacts of Stay the Course (No Action Alternative)</p> <p>No comment.</p> <p>4.3.1.4 Impacts of the Transit Focused Growth Alternative</p> <p>[Please see our comments under subsection 4.2.1.4 above.]</p> <p>4.3.1.5 Impacts of the Reset Urban Growth Alternative</p> <p>No comment.</p> <p>4.3.2 Cumulative Effects</p> <p>No comment.</p> <p>4.3.3 Potential Mitigation Measures</p> <p>Table 4.3-3 (p. 123) provides an excellent set of potential mitigation measures, but lacks any discussion of intergovernmental coordination that simply does not, and will not happen organically. Without such coordination across the region the measures listed will be less effective. Along with efforts to improve understanding of system performance, resources, and program benefits, adaptive learning feedback mechanisms need to be formulated to improve transportation system management on an on-going basis.</p> <p>4.3.4 Social Equity Considerations</p> <p>Increased use of pricing as a transportation demand management tool needs to be mitigated with income-based assistance programs modeled after the ORCA Lift transit pass program. Directing specific resources to those with the greatest need relative to personal finances can ensure low-income households benefit from transportation investments while still gaining the benefit of TDM tools region-wide.</p> <p>4.3.5 Significant Unavoidable Impacts</p> <p>There is simply too little information to make the claim that "No significant unavoidable adverse impacts are anticipated." For example, are all anticipated significant avoidable adverse impacts identified and evaluated?</p>	
Sierra Club Washington	27	<p>4.4 Air Quality</p> <p>4.4.1 Analysis of Alternatives</p> <p>Although all the alternatives show great improvements over the 2014 baseline year, we are alarmed they show so little improvement in cutting GHG emissions as expressed in CO2 equivalence. To address transportation sector GHG emissions, by 2050 or much earlier, we must transition to an all-electric (or even better technology) vehicle fleet. We did not find in the Appendices what assumptions were made about the vehicle fleet in 2050 to impact such analyses.</p> <p>4.4.2 Cumulative Effects</p> <p>No comment.</p> <p>4.4.3 Potential Mitigation Measures</p> <p>Table 4.4-2 (pp. 126-127) provides a set of potential mitigation measures that, while all should be pursued, appear to be simply the near-term actions that should be implemented, not the long-term measures needed out to 2050. We need policies implemented that drastically reduce our GHG emissions. Encouraging local jurisdictions to develop GHG reduction targets, programs, and policies will not be sufficient to achieve the level of reductions needed by 2035, say nothing of essentially zero carbon emissions by 2050.</p> <p>In consideration of social equity, the mitigation measures for air quality impacts should be accompanied by formal tracking of emission reduction benefits to ensure that those communities that have been historically most impacted are benefitting greatly from the active measures.</p> <p>4.4.4 Significant Unavoidable Adverse Impacts</p> <p>[Please see our concerns expressed under sections 4.3.5 and 4.4.3 above]</p>	<p>Mitigation measures in the SEIS are implemented, in part, through policies in VISION 2050. Provisions in the VISION 2050 Climate Change section support electrification of the vehicle fleet and other strategies to reduce greenhouse gas emissions. See response above on monitoring.</p>

Commenter	Comment Number	Comment Text	Response
Sierra Club Washington	28	<p>4.5 Ecosystems</p> <p>4.5.1 Analysis of Alternatives Once again, the alternatives all fall short of what we need to attain by 2050 in terms of impacts to our region’s ecosystems from increased development, reduction in land cover, more transportation infrastructure, and decreased habitats.</p> <p>4.5.2 Cumulative Effects No comment.</p> <p>4.5.3 Potential Mitigation Measures Once again, we see in Table 4.5-1 (p. 132) a set of potential mitigation measures that, while all should be pursued, appear to be simply the near-term actions that should be implemented, not the long-term measures needed out to 2050. We are rapidly losing our region’s key ecosystems and must reverse that trend, then restore degraded systems as best we can.</p> <p>4.5.4 Significant Unavoidable Adverse Impacts Project-specific actions leading to alteration of land cover, removal of vegetation, and loss of habitat is a significant concern for Sierra Club. See section 4.5.3 above.</p>	Comments acknowledged.
Sierra Club Washington	29	<p>4.6 Water Quality and Hydrology</p> <p>The impacts of climate change should be addressed here in much more detail as our region’s water quality and hydrology will be greatly affected without significant policy changes in place and working by 2050—actually way before then.</p> <p>While we strongly support the many necessary mitigation measures listed in Table 4.6-2 (p. 137), we believe they are insufficient to address the problem stated herein—massive increases in population and jobs by 2050. Mitigation also needs to address septic systems where they are prevalent to ensure that current standards are met where water supply wells are in proximate locations. We want to point to the need to adequately account for sub-basins when conducting integrated watershed planning, since certain characteristics and water supply may vary considerably among these sub-basins.</p>	Comments noted. A reference was added in Section 4.6 to the climate change discussion in Section 2.8.2. Mitigation measures to address septic systems have been added. VISION 2050’s Environment, Climate Change, and Public Services sections contain policies to address water quality, supply, and hydrology. Comments on watershed planning noted. Further resources to assist in watershed planning are appreciated.
Sierra Club Washington	30	<p>4.7 Public Services &amp; Utilities</p> <p>We share major concerns with many environmental organizations about solid waste generation and disposal, sanitary sewer overflows, and stormwater runoff and pollution. The alternatives do not have great differences among the impacts, but the important point here is that the Table 4.7-1 (pp. 140-141) mitigation measures are insufficient projected out to 2050. For example, we can’t simply call for increased recycling if there are no end users identified to take those recyclables. The real issue with solid waste is to produce less of it to begin with—less packaging, less plastic, less one-offs. For water, sanitary sewer, and stormwater, the mitigation measures listed are good but not sufficient to even tackle the problems the region faces today, let alone those it will face in 2050 with such increased population and jobs. We find the Transit Focused Growth alternative to possess great economies of scale advantages over the other alternatives for investments in added public services and utilities infrastructure.</p>	Comments acknowledged. VISION 2050 supports improving recycling systems and other strategies to reduce waste (see Public Services section).
Sierra Club Washington	31	<p>4.8 Parks &amp; Recreation</p> <p>The Regional Open Space Conservation Plan is a welcome addition to the array of mitigation measures since the VISION 2040 plan as outlined in Table 4.8-1 (p. 145). However, it will not be sufficient to meet the challenges of providing parks and recreational opportunities to an additional 1.8 million residents unless much greater sources of revenue can be identified to scale up its actions to a level far beyond what was contemplated when the Plan was assembled. Even significantly greater revenue may not be adequate to address the needs of parks and recreation given the assumptions and conditions under which it was formulated.</p>	Comments acknowledged. Work to develop a regional open space funding strategy is being undertaken by the Emerald Alliance for People, Nature & Community.
Sierra Club Washington	32	<p>4.9 Environmental Health</p> <p>A region designed for Transit Focused Growth with more safe and convenient opportunities for active transportation will be a healthier region. Yet, the mitigation measures identified in Table 4.9-1 (p. 148) in the contamination and pollution section may only be as effective as national or state standards and practices, largely outside the control of PSRC and its constituent jurisdictions.</p> <p>We find great favor with the measure to identify opportunities to implement complete streets, and provide facilities to promote walking and biking, but suggest that complete streets design become a standard practice, if not legal requirement for all cities in the region. Incorporation of physical activity into daily routines as a result of the built environment is an excellent way to promote public health as well as providing GHG emission reduction benefits</p>	Comments acknowledged.
Sierra Club Washington	33	<p>4.10 Energy</p> <p>While pursuing energy conservation and promoting alternative energy sources are well warranted, they alone are insufficient to address climate change. By 2050 the region (and the State and beyond) will need to have undergone a drastic transition to a full slate of green energy solutions. Such issues should be addressed here.</p>	VISION 2050 supports ongoing work to conserve energy and other strategies to address climate change (see Climate Change and Public Services section).
Sierra Club Washington	34	<p>4.11 Historic, Cultural, &amp; Archeological Resources No comment.</p> <p>4.12 Visual Quality No comment.</p> <p>4.13 Earth There are no new mitigations offered in Table 4.13-1 (p. 154) since VISION 2040 was adopted in 2008. We would expect these mitigations to include on-going updates of flood plain assessments to account for sea level rise and storm surge associated with climate change conditions as they evolve from present to 2050. Certain infrastructure may need evaluation and retrofit to withstand these effects depending on how rapidly they manifest. Other climate impacts may influence the magnitude and frequency of landslide or inundation risk, and these effects should be researched and inform relevant infrastructure decisions.</p> <p>4.14 Noise No comment.</p>	Suggested mitigation measures have been added to the SEIS Earth section.

Commenter	Comment Number	Comment Text	Response
Sierra Club Washington	35	<p>APPENDICES</p> <p>C — Modeling Methodology and Analysis Tools</p> <p>C.1 Models and Tools</p> <p>C.1.1 Regional Macroeconomic Model and Forecast Model/Tool</p> <p>We have concerns about relying on the Ray Fair macroeconomic model to provide the national and global context for the PSRC regional projections. His approach (<a href="https://fairmodel.econ.yale.edu/rayfair/pdf/2013a.pdf">https://fairmodel.econ.yale.edu/rayfair/pdf/2013a.pdf</a>) is superior to the Dynamic Stochastic General Equilibrium (DSGE) models, which incorporate dubious assumptions from neoclassical economic theory. Yet we see several areas where Fair’s model is also deficient:</p> <p>Ray Fair treats events like oil shocks and climate catastrophes as random variables, which only yield wider variances in the final predictions, modeled by guessing the sizes of the variances. Yet geologists and others who have studied “peak oil” know that there are underlying dynamics, even with relatively simple equations under certain conditions. Thus the US peak oil was accurately predicted for around 1970 a decade and a half before, and the world peak for conventional oil around 2006 was predicted about a decade prior. The timing of the next peak, which involves a variety of nonconventional oil types and technologies and financial arrangements, is less certain but still likely within a decade according to experts who expect the fracking boom to fade. Since such underlying dynamics are a primary driver of the global economy they should be included with different scenarios for their timing and strength. In this case trends could change quickly from global economic growth to stagnation, or even contraction. Similar underlying dynamics are being modeled for climate change, where recent studies forecast feedback loops, such as methane emissions and melting ice, which are escalating much sooner than previously predicted. Again, there is considerable uncertainty, but representing such variable outcomes is exactly what scenarios can do. Other ecological and resource damage could also be modeled, or included in a few aggregate variables, as in the famous limits-to-growth studies of the 1970s, which pioneered the application of system dynamics to economics (<a href="http://limits2growth.org.uk/wpcontent/uploads/2016/04/Jackson-and-Webster-2016-Limits-Revisited.pdf">http://limits2growth.org.uk/wpcontent/uploads/2016/04/Jackson-and-Webster-2016-Limits-Revisited.pdf</a>).</p> <p>Another failure of conventional macro-economics is its inability to predict or mitigate financial crashes, which have major economic effects on regional economies, like the crash of 2008. As with resource supply shocks, these financial crashes are treated as random variables, without any attempt to model alternative dynamics, or treat them as alternative scenarios. For example, Fair admits that “monetary policy is severely limited in its ability to control the economy”. Yet he assumes conventional monetary policy, such as interest rates as currently manipulated by the Federal Reserve Bank (Fed). However, the Fed could use a variety of financial tools to limit inflation, not just in consumer prices, but also in asset prices, such as stocks and housing, thus heading off financial booms and busts. It could also support investments like the Green New Deal, as a fiscal policy, by providing zero interest rate financing instead of using “quantitative easing” to pump money into Wall Street. Here, Fair, like many other economists, makes a very serious error by using an incorrect model of banking and debt. He assumes that all debt must be ‘paid off’, failing to distinguish between private and public debt. In reality much of the public debt is fictitious because it consists of dollars borrowed by the US Treasury from the Fed, which the Fed “creates out-of-thin-air”. These Treasury bonds can be paid off simply by borrowing more from the Fed, without limit, except for the impact on inflation, or if Congress actually enforces its debt ceilings. But Fair assumes that such government debt repayment must ultimately come from taxes, thus taking money out of the economy, counteracting any fiscal stimulus. Thus while peak oil and climate catastrophe scenarios could seriously damage the regional economy, financial stabilization and Green New Deal scenarios could mitigate that damage.</p> <p>Fair’s times series modeling / computing methodology is a legacy technique compared to the modern applied mathematics and scientific computing used in many other fields. The time series methods emerged from statistical and trend analysis of empirical data, not from studies to model the dynamics of multi-variable feedback loops and similar physical processes. Appropriate systems of nonlinear partial differential equations, including correct debt models, can now be easily modeled by the “Minsky” program of Professor Steve Keen (<a href="http://www.ideaeconomics.org/minsky">www.ideaeconomics.org/minsky</a>). Keen was able to correctly predict both the crash of 2008 and the ‘great moderation’ that preceded it using these methods (“Can We Avoid Another Financial Crisis”, 2017).</p>	<p>Thank you for the in-depth comments regarding the source for US forecasts, one of the more important inputs to the suite of forecasting models. Suggestions on how to expand on the information is appreciated. For the ongoing VISION 2050 effort, the scope has focused on the use of a consistent set of long-range future year population, household and employment assumptions for the region, and how to best accommodate the growth through plans and policies. Even with the uncertainty inherent in forecasts it is still reasonable to anticipate this level of growth at some point in the future, if not precisely by 2050, and plan accordingly. By design, the socioeconomic models don’t attempt to capture precisely the timing of short-run fluctuations, but to arrive at reasonable long-range projections consistent with actual non-linear experiences and expectations of how regions grow. Regional forecasts are periodically updated (every 3-4 years on average) and emerging approaches and/or data sources are monitored in the interim. Prior to the next update, inputs and methods will be reviewed, including established sources for long-range US forecasts. PSRC staff will work collaboratively with technical working groups to decide whether changes are warranted.</p>
The Wilderness Society	1	<p>Re: Public Comment for VISION 2050 Draft Supplemental EIS</p> <p>To Whom It May Concern:</p> <p>Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050. As the DSEIS aptly lays out, we are at a critical time of change here in the Puget Sound region with an intimidating forecast for adding nearly 2 million more people in the next 30 years. VISION 2050 will set the policy framework to determine how and where we grow and provide a blueprint for sustaining a healthy environment, thriving communities, and a strong economy. It is critical that we get this right and work efficiently and thoughtfully to upgrade our transportation systems, protect more parks and open space across the region, and develop new tools and policies to help our communities thrive. The Wilderness Society would like to offer support for the transit-focused growth alternative presented in the DSEIS. We believe this alternative will promote more sustainable growth and set the region forward on the right path to meet the growth challenges of the next 30 years.</p> <p>Through The Wilderness Society’s (TWS) Urban to Wild Initiative, we are working with partners across the region to close gaps and address inequities in the regional parks and open space network and facilitate connections to nature through creative transit and policy solutions and partnerships. Ultimately, we advocate for programs, policies, and investments that improve the health and well-being of local communities to ensure everyone can enjoy local parks, public lands, and the wilderness beyond.</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The Wilderness Society’s preference for the Transit Focused Growth alternative has been acknowledged.</p>
The Wilderness Society	2	<p>Through this lens, TWS would like to see a VISION 2050 Transit-focused Growth Alternative specifically:</p> <ol style="list-style-type: none"> <li>1. Incorporate all the recommended policies and actions in the 2018 Regional Open Space Conservation Plan (ROSCP) into the Preferred Alternative. The ROSCP provides a thorough and extensive summary of recommended policies and actions that can support the growth of a regional open space network throughout the region. This work is more important than ever to ensure we protect farmland and high-priority conservation lands and support the development and new parks and open space in our growing cities, with special attention to and prioritization of areas with historic disinvestment.</li> </ol>	<p>VISION 2050’s Environment section contains several provisions to implement the Regional Open Space Conservation Plan.</p>

Commenter	Comment Number	Comment Text	Response
The Wilderness Society	3	2. Define an ambitious set of Multicounty Planning Policies (MPPs) that can accelerate the conservation of nearly 500,000 acres of open space lands defined as "at-risk" through in the ROSCP. More must be done to accelerate open space conservation efforts across the region. Developing a broad set of MPPs that support protection efforts at the local jurisdictional level is a critical platform to accomplishing this ambitious goal.	See response above.
The Wilderness Society	4	3. Provide an in-depth analysis of displacement risk and anti-displacement strategies that may serve as a tool for local jurisdictions for planning and policy development efforts. With a transit-focused growth alternative, "equity geography" areas—especially in King County—stand to be displaced through the forces of gentrification if local jurisdictions are not intentional about how to ensure equitable development. PSRC must provide a strong foundation of policies and tools to support local jurisdictions as they grapple with these growth challenges.  Thank you for the opportunity to provide comment on the DSEIS. We look forward to the selection of a preferred alternative and engaging in the public comment process and public engagement sessions. Feel free to contact me at 206-473-2523 or krcraig@tw.s.org for any further information.  Sincerely,	VISION 2050 has been updated to include additional consideration of equity and displacement and includes an action to develop a regional equity strategy. See the following sections for equity-related policies: Regional Collaboration, Environment, Development Patterns, Housing, Economy, Transportation, and Public Services.
Alderwood Water & Wastewater District	1	Dear Ms. Harris:  Thank you for the opportunity to review the Draft Supplemental Environmental Impact Statement (SEIS) for Vision 2050. In general, the SEIS addresses a broad range of concerns associated with Vision 2050, and the Alderwood Water & Wastewater District offers the following comments:  Ecosystems - Sections 2.7 and 4.5 <ul style="list-style-type: none"> <li>Section 2.7.3 Relevant Plans, Studies, and Court Rulings, cites several key findings from the 2016 State of Salmon report including the fifth bullet at the top of page 46: Toxic chemicals are concentrating in the water and entering the food chain. Low oxygen caused by nitrogen discharged from septic tanks, sewage treatment plants, and other sources threatens Puget Sound.</li> </ul> <p>We believe that this information is incomplete and should be expanded to include stormwater to accurately portray the findings of the State of Salmon work. The updated 2018 report on the State of Salmon web site (<a href="https://stateofsalmon.wa.gov/puget-sound/water/">https://stateofsalmon.wa.gov/puget-sound/water/</a>) is even more specific in identifying stormwater as a major source of toxic pollution in the Puget Sound:  In Puget Sound, 45 percent of river systems show levels of toxic chemical pollution that increase health risks to juvenile Chinook salmon. As they grow, Puget Sound Chinook salmon accumulate toxic chemicals, which poses health risks to predators, including southern resident orca whales. Most toxic pollution in the Puget Sound is carried by stormwater that runs off paved roads and driveways, rooftops, yards, and other developed land. These contaminants can reduce growth, increase disease susceptibility, and alter hormone production, all of which can reduce survival of fish.  This emphasis on stormwater as the primary vector for pollution in Puget Sound is significant. The current regulatory stance towards point source dischargers such as wastewater treatment facilities does not factor in the significantly greater impact to water quality from stormwater, and thus is clearly not focusing limited resources towards the greatest positive benefit.</p> <ul style="list-style-type: none"> <li>Development continues to impact Puget Sound water quality and the 2016 State of Salmon report supports this by identifying "Poorly Managed Development" as a challenge associated with the growing human population, specifically "Development that results in habitat loss", "Poor water quality in area streams resulting from increased development": and "Forest and agricultural practices." The growth alternative selected will not necessarily make a difference in the impact to the Puget Sound water quality - and the health of salmon and orca populations - but the way development is managed and carried out certainly will. Development should be carefully managed to not only avoid further adverse impacts to sensitive ecosystems but also encouraged to correct damage done by prior development activities.</li> </ul>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The Ecosystems sections, specifically the updated 2018 State of Salmon in Watersheds Plan discussion in the SEIS has been updated based on your suggestions.
Alderwood Water & Wastewater District	2	Public Services and Utilities - Sections 2.9 and 4.7 <ul style="list-style-type: none"> <li>The introductory paragraph of Section 2.9 states that "...counties, cities, and towns have continued to plan for and provide public services and utilities that accommodate an increasing population..." This list should be expanded to include special purpose districts. Numerous special purpose districts in the Puget Sound Region provide services related to the issues covered in Section 2.9 including Utilities, Transportation, Ports, Fire, Schools, Conservation, Diking and Drainage, Public Health and Hospitals, Public Housing, and Public Facilities. These districts are a vital part of planning for and providing essential services for an increasing population.</li> <li>Section 2.9.2 Water Supply Considerations identifies surface water as a primary water supply source in King, Pierce, and Snohomish counties. The surface water in these counties comes from four different watersheds: Cedar and Tolt Watersheds (Seattle Public Utilities); Green River Watershed (Tacoma Water); and the Sultan River Watershed (City of Everett). Although Section 2.9.2 briefly mentions climate change impacts to the water supply and also references Section 2.8.2 Climate Change and Sea Level Rise, neither of these sections mentions the impact of increasing wildfire risk and insect and tree disease outbreaks (SEIS Section 2.7.4) on the watersheds contributing to the public water supply. Wildfires, insect infestations, tree disease, land development, recreation, and other activities that have the ability to alter forests within these watersheds also have the ability to significantly impact the quality and quantity of drinking water available.</li> <li>Section 2.9.2 also notes that water quality degradation may be a result of climate change; we may be beyond 'may' as raw water reservoirs for Everett, Seattle, and Tacoma are each experiencing a warming trend. This gradual warming of the raw water reservoirs results in changes to the biology of the water, leading to impacts to taste and odor which current treatment infrastructure is not designed to address.</li> <li>Also in Section 2.9.2, water consumption for the years 2000 and 2015 are mentioned. Based on a quick check with staff at Everett Public Works, the numbers in the supporting table (Public Water Supply by County) in Appendix B don't appear to be accurate.</li> <li>Service area boundaries are often determined by lot line locations, roadway corridors or corporate/agency boundaries. However geographic constraints like hills, valleys and waterways often have a much bigger impact on service affordability and ecological impacts with services like water, sewer and storm. Table 4.7-1 should be amended to encourage service providers to work collaboratively to provide the most affordable utility services to customers while minimizing adverse impacts.</li> </ul>	The Public Services and Utilities sections of the SEIS have been updated based on suggestions. Water supply data in Appendix B, is based on public supply volumes from the USGS, accessed here: <a href="https://waterdata.usgs.gov/wa/nwis/water_use/">https://waterdata.usgs.gov/wa/nwis/water_use/</a>

Committer	Comment Number	Comment Text	Response
Community Transit	1	<p>Re: Puget Sound Regional Council's Vision 2050 Draft Supplemental Environmental Impact Statement Dear Ms. Harris:</p> <p>Community Transit appreciates the opportunity to provide comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Puget Sound Regional Council's (PSRC) Vision 2050. We have been actively engaged with our Snohomish County Tomorrow (SCT) partners in evaluating regional strategies for growth and we concur with SCT's recommended approach regarding Vision 2050 growth alternatives.</p> <p>Community Transit is pleased that PSRC incorporated strategies to leverage major regional transit investment in Snohomish County. Our second Swift bus rapid transit (BRT) line opened on March 24, 2019. This \$73 million project established the first high capacity transit network for the County. Future Swift BRT projects will also connect with Sound Transit's Link Light Rail, when it extends to Snohomish County in 2024 and Everett in 2036.</p> <p>Community Transit supports the new regional geography for High Capacity Transit Communities. This new geography better reflects current development patterns and planning for future high capacity transit investments. Community Transit recommends the Transit Focused Growth Alternative as the preferred alternative, and supports SCT's requested minor modifications to population distribution, as proposed in their DSEIS letter. The Transit Focused Growth Alternative provides the land use intensities needed to support high capacity transit service, while at the same time encouraging active transportation options with a better balance of jobs and housing. This alternative builds on and reinforces the connection between land use and major transportation investments like Swift BRT and Link light rail. We believe this strategy will also provide more opportunities for social equity by prioritizing housing in close proximity to frequent transit service, potentially reducing household transportation costs.</p> <p>In addition to our general comments, Community Transit staff prepared specific comments on the DSEIS, attached below.</p> <p>Thank you again for the opportunity to provide comments for the environmental review of Vision 2050. Please feel free to contact me if you have any questions.</p> <p>Sincerely, Emmett Heath Chief Executive Officer</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. Community Transit's preference for the Transit Focused Growth alternative has been acknowledged.
Community Transit	2	<p>Community Transit, PSRC Vision 2050 DSEIS Comments:</p> <p>Page 16, Table 2.2-1 Major Employers for Snohomish County: "Edmonds City College" is actually "Edmonds Community College."</p> <p>Page 30, Transit Oriented Development: Community Transit's bus rapid transit station planning area is 1/2 mile, not 1/4 mile. Did the estimates for housing and population around TOD in Snohomish County include both Swift Blue Line (Highway 99) and Swift Green Line (Boeing to Canyon Park via Airport Rd, 128th, 132nd and SR-527) lines or just Swift Blue Line?</p> <p>Community Transit's Swift Green Line launched on March 24, 2019 and operates between the Everett Boeing/Paine Field Manufacturing Industrial Center and the Bothell/Canyon Park Regional Growth Center.</p> <p>Page 33, please consider using different color lines for Bus Rapid Transit and Major Roadways.</p> <p>With the scale of the map, it is difficult to differentiate these future networks.</p> <p>Page 67, Figure 2.13-1 Historic Sites: the map is missing the entire City of Snohomish Downtown Historic District.</p> <p>Page 84, Table 3.1-5, Actual and Forecast Employment Growth Share by County: do the Snohomish County employment figures include the estimates for the locally and county-adopted Arlington-Marysville Manufacturing Industrial Center?</p> <p>Page 123, Table 4.3-3 Potential Mitigation Measures, Transportation: Community Transit's Board of Directors adopted a Low Income bus fare on April 4, 2019. The new fare begins on July 1, 2019. Community Transit also strongly supports, "Encourage dedicated transit lanes."</p> <p>This supports the previous measure of, "Consider new and more frequent transit."</p> <p>Page 154, Section 4.14 Noise: does the analysis account for the recently opened Paine Field Passenger Terminal?</p>	The SEIS has been updated based on these comments. Both the Swift Blue and Green Lines were included in the estimates. The growth for the entire county, including the new manufacturing/industrial center, is included in the Actual and Forecast Employment Growth Share by County table. Given the regional scale of alternatives and the large variations in conditions among local areas, the level of detail for the alternatives and environmental analysis has been conducted at a broad programmatic scale.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	1	<p>Subject: Comments—Draft VISION 2050 Supplemental Environmental Impact Statement</p> <p>King County's Unincorporated Area Councils (UACs) and Unincorporated Area Associations (UAAs) —Enumclaw Plateau Community Association (EPCA), Green Valley/Lake Holm Association (GV/LHA), Greater Maple Valley Unincorporated Area Council (GMVUAC), Hollywood Hill Association (HHA), and Upper Bear Creek Unincorporated Area Council (UBCUAC) are pleased to submit a set of detailed comments herein on the subject SEIS.</p> <p>We fully support the broad goals of the Growth Management Act (GMA) as expressed on p. 3 of the subject SEIS: Managing urban growth; Protecting agricultural, forestry, and environmentally sensitive areas; Reducing sprawl; and Encouraging efficient multimodal transportation systems</p> <p>We believe public policy can provide direction and incentives for communities to grow in ways that will invite personal lifestyle decisions that are consistent with the region's goals. We also firmly support policies that strive to keep the Rural Area rural. Ways to ensure same included recognizing Urban Growth Boundaries are intended to be permanent, not fungible, and that Rural Areas provide benefits in many ways for everyone, including the residents of Urban Areas.</p> <p>The only alternative detailed in the subject SEIS that supports both the GMA's broad goals expressed above and our strong objectives to keep the Rural Area rural is the "Transit Focused Growth" alternative. The advantages of the "Transit Focused Growth" alternative are abundantly clear from PSRC's analyses, with which we agree. The other two alternatives—"Stay the Course" and "Reset Urban Growth" would set our region back in many areas and should not be pursued.</p> <p>We have noted key concerns to be addressed at a variety of governmental levels—State, Region, and County. Of these, the issue we consider critical is Transportation Concurrency. There remain deficiencies in the RCWs, in implementation at the County and City level, and in the total lack of any enforcement mechanisms. These render Concurrency, though great in theory, moot in practice and not what it was intended to accomplish—infrastructure keeping up with growth.</p> <p>We request you give due consideration to our detailed comments herein, as they represent the concerns of a vast majority of King County's Rural Area. Thank you.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. The preference for the Transit Focused Growth alternative has been acknowledged.

Commenter	Comment Number	Comment Text	Response
		<p>Peter Rimbo primbos@comcast.net Co-Coordinator, VISION 2050,  Mike Birdsall mike_birdsall@yahoo.com GMVUAC Co-Coordinator, VISION 2050, GMVUAC  Nancy Merrill epca.wa@gmail.com President, EPCA  Gwyn Vukich GVLHAssn@gmail.com President, GV/LHA  Steve Hiester info@gmvuac.org Chair, GMVUAC  Michael Tanksley   wmtanksley@hollywoodhillassoc.org President, HHA  Nancy Stafford nm.staff@outlook.com Chair, UBCUAC</p> <p>cc: Dow Constantine, King County Executive: dow.Constantine@kingcounty.gov King County Council: council@kingcounty.gov John Taylor, Director, King County Dept. of Local Services: john.taylor@kingcounty.gov Paul Inghram, PSRC, Director of Growth Management: pingram@psrc.org Ivan Miller, Comprehensive Planning Manager, King County: ivan.miller@kingcounty.gov</p>	
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	2	<p>EXECUTIVE SUMMARY [<a href="https://www.psrc.org/sites/default/files/v2050-dseis-execssummary.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-execssummary.pdf</a>] (pp. ES-7 - ES-19)</p> <p>Regional Geographies We strongly support the PSRC’s proposed new categorization system called: “regional geographies” to classify cities and unincorporated areas by roles and types: • Metropolitan Cities • Core Cities • HCT (High-Capacity Transit) Communities • Cities &amp; Towns • Urban Unincorporated Areas • Rural • Resource Lands • Major Military Installations This hierarchy better defines and more carefully recognizes the differences among such varied “geographies” and, thus, will allow a better allocation of resources to fill infrastructure needs.</p> <p>Alternatives The three alternatives under study are: • “Stay the Course” — [a direct extension of the VISION 2040 Regional Growth Strategy and assumes a compact growth pattern, focused in the largest and most transit- connected cities in the region with designated regional growth centers.]—We believe this can and must be improved upon. • “Transit Focused Growth” — [considers a compact growth pattern based on the VISION 2040 Regional Growth Strategy that assumes accelerated growth near the region’s existing and planned transit investments in Metropolitan, Core, and High- Capacity Transit (HCT) Communities, with less growth in the outlying areas.]—We believe this offers the best opportunities for the region. • “Reset Urban Growth” — [is based on VISION 2040 and shares similarities with actual growth patterns that occurred from 2000 to 2016 and assumes a more distributed growth pattern throughout the urban area, but with more growth in outlying areas.]— We believe this would be a major setback for the region and not set it on the right course moving forward.</p>	<p>Comments acknowledged.</p>
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	3	<p>Observations (ref.: Table ES-1. Summary Comparison of Alternatives to Stay the Course) We recognize the three alternatives studied in the SEIS produce differing environmental impacts. While some impacts are similar for all the alternatives, some impacts are quite different, as summarized in Table ES-3 (pp. ES-16 - ES-19). What is most striking is that across all three alternatives, clearly the region, as a whole, will be less livable. That said, almost all the impacts are least worst for the “Transit Focused Growth” alternative. Further, the “Transit Focused Growth” alternative has the Rural, Urban Unincorporated, and Cities/Towns showing the least growth. Clearly, for our organizations, which want to reduce sprawl, keep the Rural Area rural, and limit outlying cities to less growth, the “Transit Focused Growth” alternative is most attractive. We also are confused by the rationale to define the “Stay the Course” alternative as the “no action” alternative when the “Reset Urban Growth” alternative is a much closer fit to the trends of actual growth from 2000 to 2017, as explained in Appendix C: Modeling Methodology and Analyses Tools. We believe the “Reset Urban Growth” alternative should be defined as the “no_action” starting point and, then, assess the “Stay the Course” and “Transit Focused Growth” alternatives as points of departure from it—with the latter being more extensive than the former.</p>	<p>Comments noted. Stay the Course is the no action alternative because the action to be taken is a plan. If no action was taken, PSRC would use the same Regional Growth Strategy identified in the current plan, VISION 2040, extended out to 2050.</p>
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	4	<p>Concerns (ref.: Table ES-2. Impacts Common to All Alternatives) Of the impacts common to all the alternatives we are concerned with the following specific impacts and for which long-term mitigation is critical:</p> <p>Population, Employment, Housing, and Land Use</p> <ul style="list-style-type: none"> <li>• Population and employment growth in less-developed and rural areas would result in lower-density land uses and potential development pressures on natural resource lands — What policies can be strengthened to minimize development activity in the Rural Areas and directly adjacent cities and towns?</li> </ul> <p>Transportation</p> <ul style="list-style-type: none"> <li>• The average time people spend in congestion each year is forecast to increase —What changes to the Regional Transportation Plan are needed to alleviate this outcome?</li> </ul> <p>Ecosystems</p> <ul style="list-style-type: none"> <li>• Activities associated with development, including clearing, grading, vegetation removal, and conversion of land to impervious surface would have adverse impacts to ecosystem resources such as fragmentation and degradation of habitat —This is a serious issue for the region for reasons such as salmon and orca survival, and must be mitigated by vigorous and continuous policy support.</li> </ul> <p>Water Quality and Hydrology</p> <ul style="list-style-type: none"> <li>• Amount of impervious surface would increase as a result of added development, which may alter stormwater hydrology, reduce aquatic habitat, and degrade water quality —This also is a serious issue for the region, and must be mitigated by vigorous and continuous policy support.</li> </ul> <p>Parks and Recreation</p> <ul style="list-style-type: none"> <li>• For both local and regional parks, recreation, and open space resources, growth would lead to increased use, which could lead to degradation of the recreational experience, potential degradation of natural and open space resources, and increased conflicts between users —As Rural Area residents already experience this impact regularly, what mitigation can be provided?</li> </ul>	<p>Concerns have been noted. Mitigation measures identified in the SEIS are implemented through VISION 2050’s policies. Policies to encourage compact, urban redevelopment and reduce the impact of rural development can be found in the Regional Growth Strategy and Development Patterns section. Policies to improve mobility and transportation choices are in the Transportation section. Policies to protect the environment and water quality from development impacts are in the Environment and Development Patterns section. A policy to encourage improved access to parks, open space, and trails for urban residents is in the Environment section. The Regional Open Space Conservation Plan provides some recommendations on where access can be improved.</p>

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Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	5	<p>Visual Quality</p> <ul style="list-style-type: none"> <li>Development in existing outlying and rural areas would potentially convert undeveloped spaces to other uses and may not be consistent with community visual character —This is best mitigated by attention to prevention of such development in the first place (see Population, et al, above).</li> </ul> <p>Our comments/questions above refer to mitigation due to the lack of meaningful mitigation discussed in the draft SEIS. There are general types of mitigation described in various tables, but no indication of any specific commitment to implementation, nor to the effectiveness of mitigation options. Such commitments should be part of the choice of alternatives.</p>	See response above. Policies to protect visual quality and resources are included in VISION 2050's Development Patterns section. Given the regional scale of the plan and the large variations in conditions among local areas, the level of detail for the environmental analysis and mitigation measures has been conducted at a broad programmatic scale. Analysis at the local level is beyond the scope of the SEIS. Localized impacts of growth could vary and would depend on more specific actions that would be considered during project-level environmental review.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	6	<p>Advantages (ref.: Table ES-3. Summary Comparison of Alternatives Impacts) We see the following relative advantages for the "Transit Focused Growth" alternative as compared to the "Stay the Course" alternative, although the outcomes for both alternatives are will be dependent on the specific mitigations implemented:</p> <p>Land Use</p> <ul style="list-style-type: none"> <li>6% (vs. 9%) of growth throughout the region occurs in proximity to urban growth boundary</li> <li>75% (vs. 48%) of population and employment growth occurs near high- capacity transit</li> </ul> <p>Transportation</p> <ul style="list-style-type: none"> <li>Reduced average travel times</li> </ul> <p>Ecosystems</p> <ul style="list-style-type: none"> <li>Less growth to areas with regionally significant habitat, reduced impacts</li> </ul> <p>Water</p> <ul style="list-style-type: none"> <li>Less impervious surface added to region Public Services and Utilities</li> <li>Less growth in outlying and rural areas may reduce the need to construct or expand facilities near open spaces, decreasing impacts</li> </ul> <p>Parks and Recreation</p> <ul style="list-style-type: none"> <li>59% of population would be near parks in 2050</li> </ul> <p>Visual Quality</p> <ul style="list-style-type: none"> <li>Less development in outlying and rural areas would slightly reduce negative impacts to these areas</li> </ul>	Comments noted.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	7	<p>Introduction [<a href="https://www.psrc.org/sites/default/files/v2050-dseis-chap1.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-chap1.pdf</a>] (pp. 1-8)</p> <p>We support the following specific items from the Growth Management Policy Board's VISION 2050 desired outcomes.</p> <ul style="list-style-type: none"> <li>"Climate. Meaningful steps have been taken to reduce carbon emissions and minimize the region's contribution to climate change." —Much more should be done in this direction.</li> <li>"Economy. Economic opportunities are open to everyone, the region competes globally and has sustained a high quality of life. Industrial and manufacturing opportunities are maintained." —The Rural Areas do need more rural-centered economic opportunities, but not extensions of urban industrial activity into rural areas.</li> <li>"Innovation. The region has a culture of innovation and embraces and responds to change."</li> <li>"Mobility and Connectivity. A safe, clean, integrated, affordable, and highly efficient multimodal transportation system reduces travel times, promotes economic and environmental vitality, connects people, and supports the Regional Growth Strategy." —Yes, but "pass-through" urban-originated commuting traffic on county roads in the Rural Areas is a continuing issue, which has drastically strained County roads budgets to the point that normal maintenance has been adversely affected.</li> <li>"Natural Resources. Natural resources are permanently protected, supporting the continued viability of resource-based industries, such as forestry, agriculture, and aquaculture." —In addition, we must not lose sight of mitigation and cleanup responsibilities we must ensure occur to restore areas that have been depleted or degraded.</li> <li>"Resilience. The region's communities plan for and are prepared to respond to potential impacts from natural hazards and other adverse events."</li> <li>"Rural Areas. Rural communities and character are strengthened, enhanced, and sustained." —We fervently support this vision, but surrounding growth continues to build strong pressures on the Rural Areas.</li> </ul>	Support for outcomes has been acknowledged.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	8	<p>2. Affected Environment [<a href="https://www.psrc.org/sites/default/files/v2050-dseis-chap2.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-chap2.pdf</a>] (pp. 9-74)</p> <p>We agree with the assessment of "What are some of the key regional changes in the last decade?" However, we would caution planners to recognize that "Transit infrastructure around the region is expanding, and transit ridership is increasing" is very locational-dependent. For example, in the outlying cities and Rural Areas of King County transit options are extremely limited or non- existent, yet there are many commuters that use the few main arterials available creating daily congestion far and wide.</p>	Comment acknowledged.

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Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	9	2.1 Population (pp. 10-13) In looking at Appendix B, the data that supports this section, it is difficult to discern what methodology and assumptions were used in developing population forecasts out to 2050, especially population distribution among cities. We remain concerned there is too much left up to subjective decisions. For example, how were growth targets used, if at all? This is important as some outlying cities in King County, e.g., Black Diamond and Covington plan to exceed their Growth Targets. In the case of the former, grossly exceed. For the latter, we understand PSRC already has imposed conditions as part of its certification of the city's Comprehensive Plan. This is not where the PSRC or our organizations want to see growth, especially when it is not accompanied by jobs and transit, thus imposing even more pressure on already-strained existing transportation infrastructure and directly threatening the rural way of life.	Appendix C of the SEIS describes the methodology for the regional macroeconomic model and forecast. It is structured in a top-down manner, with productivity, aggregate employment, income, and inflation forecast initially, followed by subsequent modules for demographic composition and industry detail. The model equations are estimated using over four decades of historical data. More detail can be found in Appendix C.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	10	2.2 Employment (pp. 14-17) An issue not addressed is that today jobs in the Rural Areas, generally, do not pay enough for the residents of the community to be able to afford the housing, such that they must live and commute from outside the area. We have a concern about heritage family businesses located in the Rural Areas. These family-run businesses help promote a strong and viable community. If over-development is allowed in the Rural Areas, then land values invariably rise to the point that these families have to sell their businesses and move, resulting in the loss of family-run businesses to the local communities.	VISION 2050 helps to address this concern with policies in the Economy section that promote job opportunities throughout the region to create a closer balance between jobs and housing and widely shared prosperity.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	11	2.3 Housing (pp. 18-22) The high cost of housing—affordability—is a critical issue for the region—as a whole. Quality of life is jeopardized to varying degrees for most families. It forces many to move farther away from their jobs and commute longer distances, which adversely affects the entire region. In addition, in several urban areas, where there is a focused effort to accommodate density in downtown cores, a high quantity of individual units are being built, with not as much focus on quality—as in the kind of places people would want to live. There needs to be a better balance between quantity and quality, if accommodating more density is to work in the long run. Just adding more small units near transportation hubs cannot be the universal response to these efforts, if we want these urban villages to be desirable places to live for a variety of people.	Comment acknowledged.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	12	2.4 Land-Use (pp. 23-31) 2.4.1 Regional Land Use Without the context of location, it is hard to assess the following statements: "Figure 2.4-3 shows parcel sizes in the region's rural areas. The distribution of parcel sizes is similar to that in the VISION 2040 FEIS, showing that parcels smaller than five acres are the dominant size and are located throughout the land designated as rural. Of the rural parcels that are less than 5 acres in size, about 60,000 are vacant, indicating the potential for substantial future rural development." For example, where are those "vacant" "60,000 parcels" in the Rural Area? Which counties possess the most? We do not want, nor would we expect the PSRC to want, "substantial future rural development." However, we do recognize and support that legal lots can be developed. 2.4.2 Regional Growth Centers and Manufacturing/Industrial Centers We continue to support these Regional Growth Centers (RGCs), as they allow for both jurisdictions and businesses to better plan their land-use decisions. However, we remain quite alarmed that King County has designated Industrial-zoned sites in its Rural Area which are completely incompatible with the surrounding Rural Character and violate the intent and purpose of the Growth Management Act. Regarding Figure 2.4-4 (p. 29) we do question whether some of the RGCs have efficient multimodal transportation options. It would help if the RGC map also included areas of high growth rates of housing and vehicular traffic. This would provide an early warning of potential problem areas. 2.4.3 Transit-Oriented Development The trend towards more Transit-Oriented Development should continue, as it leads to the most efficient use of land and infrastructure funds.	Comments acknowledged. The land use figure on parcel size in rural areas provides some information on where small rural parcels are located within the region. Measures in the land use section identify strategies to mitigate rural growth impacts. Mitigation measures in the SEIS are implemented, in part, through policies in VISION 2050. VISION 2050's Regional Growth Strategy section has policies to focus growth in cities and centers and the Transportation and Development Patterns sections have policies to promote improved multimodal transportation in and connecting to centers.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	13	2.5 Transportation (pp. 31-38) 2.5.1 Transportation System Capacity Improvements The first sentence under the section title states: "The Regional Transportation Plan contains a variety of planned investments to increase mobility, both at the local and regional scale." It goes no further to explain this variety of planned investments or to confirm the level of confidence in obtaining these funds. Worse, there is no accounting for mitigation needs that should be added to the Regional Transportation Plan (RTP), approved in 2018, to offset the growth forecast for 2040 to 2050. An honest presentation of the major changes to the RTP that each alternative will require is a key piece of information needed to make an informed choice. We remain extremely wary of the impacts of pass-through commuter traffic from cities inside the Urban Growth Area along inadequate and overwhelmed county roads in the Rural area to get to jobs in other cities in the Urban Growth Area. King County has insufficient funds to maintain its vast network of roads. This problem has been getting worse every year with no apparent solutions that satisfy all parties. Cities must help pay to maintain county roads their citizens and businesses use everyday. 2.5.2 Transportation System Efficiency Improvements The first sentence under the section title states: "Transportation system efficiency improvements include strategies for enhancing system efficiency and mobility without adding capacity to the system." We agree that simply adding more lanes is not a long-term solution, but solutions should be explored that encompass, by all means possible, the true goal: alternatives to driving alone. While we support the efforts to shift trips out of peak-travel periods or eliminate the need for trips, it should be recognized there are requirements placed upon many people by their employers. In addition, when it comes to the Rural Areas—which we understand is a small percentage of the four-county population—employment opportunities are few and far between; consequently, asking many people to walk or take a bike to work, simply ignores reality. We suggest that a more helpful action would be to expand the commuter bus network so that people in Rural Areas and outlying Cities and Towns have real alternatives to driving alone. Such an expansion should also provide for secure parking facilities as such commuters often have to travel long distances to catch a bus. The draft VISION 2050 SEIS appears to place all adaptability and responsibility on the individual citizen, but employers too must be adaptable. We support advancements in transportation, but it is difficult to assess potential impacts of untested technology that is not in common usage at this time.	The VISION 2050 SEIS analyzed the impacts of various growth alternatives, keeping the existing planned transportation network to 2040 constant. The Regional Transportation Plan is updated every four years, and the 2022 update will address potential new investments to respond to the additional growth.

Commenter	Comment Number	Comment Text	Response
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	14	2.6 Air Quality and GHG Emissions (pp. 39-42) 2.6.2 Greenhouse Gas Emissions and Climate Change There are several listings of GHG emission reduction targets adopted by King County, PSCAA, and the State, yet they all differ. Although the PSRC has no control over such legal decisions by various jurisdictions and agencies, it must be recognized that such differing targets not only do not support each other, but probably will not stem the worst effects of human-accelerated climate change. Further, the Regional Transportation Plan's (RTP's) Four-Part Greenhouse Gas Strategy is being systematically undermined by the Federal government's rollback of fuel economy and greenhouse gas standards for passenger vehicles and trucks.	Comment acknowledged.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	15	2.7 Ecosystems (pp. 43-48) 2.7.3 Relevant Plans, Studies, and Court Rulings Although the following statement generally is true: "Toxic chemicals are concentrating in the water and entering the food chain. Low oxygen caused by nitrogen discharged from septic tanks, sewage treatment plants, and other sources threatens Puget Sound." (p. 46) We would like to have reflected here that there is no known data or correlation between onsite sewage systems in the Rural Areas and 'low oxygen' levels in regional surface waters, including Puget Sound. Proper location, operation, and maintenance of onsite sewage systems do not contribute to this issue, and any statement or assertion to the contrary should be corrected. [Please note: SB 5503, Section 1, signed by Governor Inslee on April 17, 2019, and effective July 28, 2019 (Laws of 2019, Chapter 50).] With the Rural Areas growing so slowly, as the GMA intended, VISION 2050 should not recommend any additional restrictions or limitations being placed on onsite sewage systems located in the Rural Areas. 2.7.4 Climate Change We share concerns expressed here in terms of adverse impacts to wildlife habitat, forests, biodiversity, and water acidification and how this will affect Rural Area ecosystems and residents.	The Ecosystems sections of the SEIS have been updated with more current information.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	16	2.8 Water Quality and Hydrology (pp. 48-53) 2.8.1 Impervious Surfaces The last sentence of the first paragraph states: "In addition, redevelopment of areas with outdated stormwater infrastructure can result in improvements to water quality through upgrades and improvements to stormwater management." We would add: ", including emphasizing conservation and redirection (or repurposing) of water flows to wetland and wildlife basins to promote water resource recycling, cleaning, the recharging of the aquifer, and for natural areas, parks, and/or recreation purposes." Currently, a high percentage of impervious surface area run-off is piped away and discharged quickly into corridors which flow to the sea and provide little for wildlife. Also, there are conflicting use pressures along critical water supply corridors, such as the location of industries along the Cedar River corridor in the Rural Area which remove existing vegetation and add impervious surfaces. 2.8.3 Policies and Regulations We believe the recently established Watershed Restoration & Enhancement (WR&E) Committees are a good idea, if these efforts reasonably address and protect the use of groundwater in the Rural Areas for single-family homes and small farms (see: <a href="https://ecology.wa.gov/Water-Shorelines/Water-supply/Streamflow-restoration/Streamflow-restoration-planning">https://ecology.wa.gov/Water-Shorelines/Water-supply/Streamflow-restoration/Streamflow-restoration-planning</a> ). Unfortunately, Rural Area residents have been excluded from these WR&E Committees which will directly affect watersheds in which they live and unfairly overpopulate these Committees with urban representation. Although this is a State issue, the PSRC could exert influence in the region to ensure the public is fully represented in such planning activities, as these issues will only be exacerbated with the influx of so many more people into the region, especially where large municipal groundwater withdrawals for water supply far exceed and, in fact, compete with residential use in the Rural Areas (e.g., City of Kent well field in the Maple Valley "Four Corners" area).	The Water Quality and Hydrology section has been updated in response to this comment. Comments on committee participation have been shared with the Department of Ecology.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	17	2.10 Parks & Recreation (pp. 56-61) 2.10.5 PSRC Regional Open Space Conservation Plan We participated in the review and comment on the PSRC Regional Open Space Conservation Plan and support it.	Comment acknowledged.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	18	2.11 Environmental Health (pp. 61-64) We remain concerned about contaminated sites in the Rural Areas and the intent to grant permits for isolated Industrial-zoned parcels in the Rural Area, especially in King County where a major asphalt facility is being moved from inside the Urban Growth Boundary (the City of Covington) to the Rural Area along the Cedar River. Urban or Urban-serving facilities have no place in the Rural Areas simply because the land may be less expensive to the permit applicant.	Comment acknowledged.

Commenter	Comment Number	Comment Text	Response
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	19	<p>2.13 Historic, Cultural, &amp; Archeological Resources (pp. 66-67) The viability of historic, cultural, and archaeological resources is increasingly at risk due to injudicious and often ill-considered development throughout the Rural Areas. Among many examples is the King County-designated Green Valley Road Heritage Corridor, one of nine such Roads and home to the Neely Mansion, listed on the National Register of Historic Places. Massive developments are planned and construction has begun in the adjacent Urban Area. Although only in its nascent stages, the resulting impacts have caused and will continue to cause undue pressures on these unique and beloved community landmarks. Such imprudent development results in increased traffic, difficulty in accessibility and other issues which include safety concerns, that place the viability of such exceptional cultural/heritage and tourist venues at risk. This area is also home to one of five King County-designated Agricultural Production Districts (APDs), all of which also have significance as cultural and historic venues, especially intergenerational family farms. Plans for motorsports racetrack expansion adjacent to the historic Soos Creek Salmon Hatchery will place further undue hardship on nearby areas.</p> <p>We strongly support careful consideration of all areas adjacent to the urban fringe. We also urge limits on development and careful consideration in planning and permitting in localities where there is close proximity and/or impacts to King County-designated Heritage Corridors, APDs and increasingly-endangered Rural Area historic, cultural and archaeological resources.</p> <p>We find very few Rural Area sites identified in Figure 2.13-1. Historic Sites (p. 67). There is no lack of eligible venues, e.g., there are a number of agricultural buildings in the Greater Puget Sound area that date to the 19th century. One of the oldest buildings in King County is an 1879 barn along the Green Valley Road Heritage Corridor built by one of the earliest settlers in SE King County. Unfortunately, especially in the unincorporated areas, there is a general lack of funding to designate buildings, sites, and areas as places of historic significance.</p>	Comments acknowledged. Policies in VISION 2050's Development Patterns section support the identification and preservation of historic, cultural, and visual resources. Figure 2.13-1 only shows resources that are on the National Register of Historic Places and has been updated to include additional resources. Many of these resources may be considered during project-level environmental review.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	20	2.14 Visual Quality (p. 68) In the Rural Areas, Visual Quality is very important to local residents, as well as visitors from Urban Areas. Often, if high quality is lost, it is difficult or impossible to retrieve. Coordination with Rural Area residents—who are most familiar with and have interest in preserving visual quality— when changes are being planned, would help preserve high quality from unfortunate loss to all.	Comments acknowledged.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	21	2.15 Earth (pp. 68-69) Figure 2.15-1. Regional Geologic Hazard Areas (p. 68) appears to be incomplete. Rural Area residents have experienced flooding along the Cedar River between the cities of Renton and Maple Valley; there are many more fault lines that we have gathered from multiple sources; and the Cedar River canyon's steep slopes have recently experienced multiple landslides directly impacting SR-169. Yet, none of this is indicated on the map.	Additional text has been added to this section to clarify that this figure is not intended to capture every geologic hazard area; however, the intent is to show the prevalence of many types of geologic hazards in the region.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	22	<p>2.16 Noise (p. 70) There is no discussion of noise common to the Rural Areas and its impact on residents and the surrounding environment. Unfortunately, the following section (2.17) does not even mention noise regulations adopted since VISION 2040, further prompting a need to look at whether current regulations are appropriate and address the increased noise from new development and traffic congestion in both the Urban and Rural Areas. However, in the Rural Areas the biggest concern is enforcement. Noise complaints from Rural Area residents yield very little relief. In King County, Public Health ignores noise as a detriment to health; the Sheriff's Office doesn't prioritize enforcement of existing laws; government representatives at all levels pass noise limits, but then do not adequately fund enforcement; and the Department of Local Services Permitting Division continues to allow housing in high-noise areas (e.g., along highways or busy thoroughfares), or allows high-noise commercial operations in/near residential zoned areas (e.g., Pacific Raceways, Buckley Recycling, Asphalt Plants, etc.). Such problems could be rectified by requiring mitigation on the permitting of any noisy business that calls for minimizing noise impacts on nearby residential areas with physical noise walls, hours of operation, etc. Annual business license approvals would help ensure such mitigation is being properly followed.</p>	Additional mitigation measures have been added to the SEIS in response to this comment.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	23	2.17 How Has the Regulatory Setting Changed Since VISION 2040? We remain concerned that not all city Comprehensive Plans have been updated since 2008. A case in point is the City of Black Diamond, which is planning to quintuple in population in the next 10 to 15 years, yet still hasn't completed its "2015" Update to describe how it plans to accommodate such mega-growth and its adverse impacts on neighboring communities.	Comprehensive plans for Black Diamond and Buckley have not been fully updated consistent with the Growth Management Act's required timing. PSRC reviews and certifies plans as they are updated, but does not have the ability to require communities to update plans.

Commenter	Comment Number	Comment Text	Response
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	24	<p>3. Alternatives Evaluated [<a href="https://www.psrc.org/sites/default/files/v2050-dseis-chap3.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-chap3.pdf</a>] (pp. 75-96)</p> <p>In reviewing the opening of this chapter and how growth projections were developed, we remain troubled by how inconsistently growth management principles are applied across King County. For example, there are some cities that are not meeting their Growth Targets, while there are others that plan to exceed (or grossly exceed) their Growth Targets.</p> <p>Numerically, these might cancel out, but desirable growth and where it can be best accommodated is very location dependent. To reduce sprawl and ensure the best use of infrastructure monies, it is desired to ensure that cities near major employment centers and best served by transit at least meet their Growth Targets, if not exceed them; while cities far from major employment centers and least served by transit should not exceed (or worse, grossly exceed) their Growth Targets.</p> <p>Unfortunately, this is not happening and policies should be re-evaluated to see what can be done to ensure the desired outcomes as outlined in the overall regional growth strategy.</p> <p>3.1 How the Alternatives Were Developed (pp. 77-85) The information in Appendix C: Modeling Methodology and Analysis Tools relies on a series of many key assumptions. While we understand that making assumptions is part of such modeling and analyses, it should be recognized, possibly through a series of sensitivity studies, how dependent some of the results thereof are to small changes in such assumptions. For example, population growth and job growth assessments were made using sophisticated models and tools, but according to a variety of assumptions about how those models would be exercised. While we understand many assumptions are made when developing/running models and conducting analyses, what is lacking is sufficient information to allow a reader to understand the scope of those assumptions, and the range of possible alternative assumptions. Consequently we recommend the following questions be addressed: 1. What is the minimum/maximum development capacity in each of the regional geographies? 2. What would be the maximum range of alternative growth patterns? 3. How confident can we be that each alternative would materialize under current policies and plans? 4. What new or changed policies and/or legislation is needed to achieve the vision provided by each alternative?</p>	<p>Local jurisdictions cannot fully control where and when development occurs. When development is inconsistent with locally adopted comprehensive plans, jurisdictions are encouraged to reevaluate plans and consider changes to policies, land use designations, capital plans, and other strategies. Development capacity is analyzed periodically for each county in buildable lands reports. However, development capacity continually changes as jurisdictions update plans and make land use changes. Development capacity in 2050 is likely to be different than development capacity today. There are few tools to predict the future accuracy of growth models. However, past PSRC forecasts have been reasonably accurate at a regional, long-term scale. Models are not intended for predicting local or short-term outcomes.</p>
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	25	<p>3.2 Stay the Course (No Action Alternative) (pp. 85-87) Clearly, the current "course" does not work for existing growth and would be even worse for the projected growth coming to the area. Therefore, maintaining that same course into the future is not a strategy we would support.</p>	<p>Comment acknowledged.</p>
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	26	<p>3.3 Transit Focused Growth Alternative (pp. 87-89) We believe this is by far the best alternative in terms of transportation infrastructure efficiency, quality of life, environmental impacts, and economic development—the "best bang for the buck."</p>	<p>Support for the Transit Focused Growth alternative acknowledged.</p>
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	27	<p>3.4 Reset Urban Growth Alternative (pp. 89-91) It appears this alternative describes a continuation of historical trends which lead to inefficient sprawl. This actually is contrary to adopted regional plans. Further, to accommodate the projected growth to come, this alternative would result in much worse sprawl than contemplated by the Growth Management Act. Consequently, we do not support it. The fact that historical trends to 2017 are in opposition to regional plans gives abundant proof that stronger policies and legally empowered enforcement are needed.</p>	<p>Comment acknowledged.</p>

Commenter	Comment Number	Comment Text	Response
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	<p>28</p>	<p>3.5 Alternatives Comparison (pp. 92-96) The graphics herein directly support our statements above on the three alternatives. However, we note that none of the alternatives includes any factual mitigation for the impacts of growth added beyond 2040. The discussion of potential mitigation measures in Chapter 4 is quite generic and lacks many factual specifics. We recommend specific mitigation measures be included, especially in the area of transportation facilities and services to accommodate growth. Otherwise, it appears the region will continue to grow for another decade after 2040 with no offsetting mitigation and quality of life will suffer for all citizens as a result. The Growth Management Act requires that mitigation be provided as growth occurs.</p> <p>As previously stated, there is no attention to the critically important issue of policy enforcement, to assure that Growth Targets are actually met and that mitigation actually occurs. None is more important than the matter of Concurrency under the Growth Management Act. We view Concurrency as practiced today as ineffectual and failing to achieve the intended result of “mitigation concurrent with development” in any practical sense. There needs to be a new direction for impact fees and Concurrency, probably established through State legislation. PSRC could serve the region well by developing such a new direction and working with the State legislature to make appropriate Growth Management Act changes. We see the need for State action on Concurrency as critical and long overdue.</p> <p>In the long run we would like to see the following further improvements: 1. Transportation: Strive to decrease the percentage of trips made by driving alone, while increasing opportunities for walking, biking, and transit. 2. Water Quality &amp; Hydrology: While we understand that water quality may suffer, unless adequately protected, with more population, we do need to make certain there is enough water period. Water supply in several areas (e.g., Ravensdale) is limited by a low water table with many wells going dry during a hot summer. We need to ensure water quantity and quality will be adequate in the Rural Areas 30 years out. 3. Parks and Recreation: Growth already is leading to “degradation of the recreational experience, potential degradation of natural and open space resources, and increased conflicts between users.” This is already occurring and directly affecting rural residents, such as in and around Tiger Mountain, where neighborhoods have been overtaken by urban recreational visitors and pass-through commuters—and it is getting worse each year. All counties, especially King County, must recognize the significance of the problem and budget accordingly to support the needs of rural residents. Or, “to protect rural residents from unwelcome impacts of urban growth not properly mitigated.”</p>	<p>See response above on the regional scale of the analysis and mitigation measures. See responses below to specific elements of the environment.</p>
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	<p>29</p>	<p>4. Environmental Effects and Mitigation [<a href="https://www.psrc.org/sites/default/files/v2050-dseis-chap4.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-chap4.pdf</a>] (pp. 97-156)</p> <p>4.1 Population, Employment, and Housing (pp. 97-107)</p> <p>4.1.1 Analysis of Alternatives</p> <p>4.1.1.1 Impacts Common to all Alternatives</p> <p>4.1.1.2 Comparison of Alternatives</p> <p>Figure 4.1-1. Jobs-Housing Index, 2050 [p. 100], shows the Job-Housing Index’s (JHI’s) between the two “alternatives” to “Stay the Course” path are nearly identical (i.e., 1 - 2 percentage points difference—within the “noise” level of the assumptions). Whereas it’s the “Stay the Course” path that has a measurable and, possibly, significant difference. But that difference exclusively favors King County at the expense of the other three counties, especially Kitsap (which, according to Table 2.3-1 [p. 19], is almost all dominated by single-family housing: 87% vs. KC’s 56%). So, at least from this JHI metric, the long-term economic vitality of those three counties could be improved by striving toward the paths laid out in the two alternatives. In the Job-Housing Balance metric it is not explained how a home is used, or whether there is a home occupation or home-based industry. We believe this could affect this metric, at least as it is evaluated in the Rural Areas.</p> <p>4.1.1.3 Impacts of Stay the Course (No Action Alternative) It is alarming to see this alternative’s large deficit of moderate-priced housing in King County, because it implies enormous pressure on the Rural Areas, especially developable lands near the Urban Growth Boundary, to supply that demand in King County rather than necessarily divert it to other counties. The result is likely to be further violation of planned growth targets, and a continuation of the sprawl that occurred from 2000 to 2017. To avoid such sprawl, strong growth-control measures must be enacted.</p> <p>4.1.1.4 Impacts of the Transit Focused Growth Alternative This alternative’s distribution of growth by density is far preferable to Stay the Course, due to its smaller share of low-density housing and, thus, lessened impacts on the Rural Areas. However, as noted elsewhere, the numbers in Table 4.1-2 are merely assumptions. There needs to be an enforcement plan to assure that growth will be channeled in this direction, contrary to all past history.</p> <p>4.1.1.5 Impacts of the Reset Urban Growth Alternative At 33% low-density growth in King County, this alternative is the least desirable for the region and clearly so for the Rural Areas, where much more development would occur, in conflict with the desires of rural communities. Yet, this alternative is quite likely to materialize, because it reflects the reality of past trends. No matter what land use “vision” is adopted, this is what the marketplace will produce, unless the marketplace is guided by stronger legislation than now exists. There needs to be a mitigation plan to produce better outcomes than the region has seen in the recent past.</p> <p>4.1.2 Cumulative Effects We agree with the broad conclusion that: “the contribution of growth to climate change is inversely proportional to the compactness and density of new development.” This provides further rationale for our support for the Transit-Focused Growth alternative.</p> <p>4.1.3 Potential Mitigation Measures</p> <p>Table 4.1-4. Potential Mitigation Measures: Housing and Employment (pp. 105-106) incorporates seemingly every desirable strategy that might have merit. As elsewhere, we ask for realism. For example, which of these mitigation strategies:</p> <ol style="list-style-type: none"> <li>1. Will have the most benefit to the regional plan?</li> <li>2. Will receive tangible priority when PSRC interacts with local governments?</li> <li>3. Require changes in state law or local codes to be enforceable?</li> </ol> <p>The track record of actual development patterns is clear: the regional plan for distribution of new housing and jobs is not being followed by the marketplace. Plans can be put in place to help change that trend. We would add the following bullet to the part of Table 4.1-4 labeled “Topic: Support Regional Economy and Employment”:</p> <p>“Provide a supportive environment for business start-ups, small businesses, and locally owned businesses.” People who start a home-based business often do so because they have a passion for a particular area of interest. They have a need to create for themselves an income and a lifestyle, with some level of comfort. They do not necessarily</p>	<p>Comments on alternatives and mitigation measures acknowledged. VISION 2050 policies help to implement the Regional Growth Strategy. The suggested mitigation measure has been added to the SEIS Employment section. A policy in VISION 2050’s Economy section has been included to support small, locally-owned, and start-up businesses.</p>

Commenter	Comment Number	Comment Text	Response
		<p>exist just to provide "family wage jobs." In the case of building a business, misdirection, interference, and indifference in the community could result in the small business owner deciding to pack-up and leave for a better business environment.</p>	
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	<p>30</p>	<p>4.2 Land Use (pp. 107-117) We first provide some general comments. We appreciate the identification of rural lands as subject to adverse impacts under all alternatives due to unwanted development. While this may seem a minor side-issue to the region as a whole, it is a critical issue to rural residents. To avoid urban growth spilling over into the Rural Areas, the region should develop effective enforcement policies, or rural land will be irrevocably lost to the detriment of all. Further, we have major concerns with the progress and success of past regional plans. Clearly, the "Stay the Course" alternative simply is the extension from 2040 to 2050 of the adopted 2040 regional plan policy principles for allocating regional growth down to local areas. Thus, it is called the "no action" alternative. The other two alternatives are variations thereof, designed to show what could happen if the VISION 2040 plan is modified in certain ways.</p> <p>The "Reset Urban Growth" alternative represents the continuation of actual growth patterns observed 2000-2017, which have not followed the guidance of regional plans. There is much more development happening in the small cities and towns (Covington, Maple Valley, Black Diamond, etc.) and the unincorporated areas than the regional plan intends, and less growth than planned is happening in the denser core cities.</p> <p>So, "continuing existing trends of growth" could be called the "no action" case in practical terms and the "Reset Urban Growth" alternative could be viewed as the "baseline" case. In this way, the "Stay the Course" alternative represents a set of policies to pursue some transit-oriented development as planned in the currently adopted VISION 2040 and the "Transit Focused Growth" alternative as a still more transit-focused growth plan. One last point, since current development trends result from market realities, the planned alternatives envisioned will not happen unless the market gets shaped by much stronger controls on development than currently exist. Unfortunately, the "Reset Urban Growth" alternative is most likely to happen based on current market forces and that concerns us greatly.</p> <p>4.2.1 Analysis of Alternatives 4.2.1.1 Impacts Common to all Alternatives We strongly concur with in the general statement "some cities and counties may require updates to policies and regulations to accommodate the action alternatives or achieve the growth pattern in Stay the Course." Strong enforcement actions are called for in all cases, but we see little herein to give hope that such will occur. We applaud the description of possibly adverse impacts on Rural Land if urban growth goals are not met. We recommend changing: "could potentially impact existing rural character ..." to:</p> <p>"will adversely impact existing rural character ..." Similar concerns apply to Natural Resource Land and Critical Areas. 4.2.2 Cumulative Effects We see major concerns here: "As noted in the VISION 2040 FEIS, local jurisdictions may face challenges in improving their transportation and other infrastructure and facilities to accommodate planned growth. They also may face challenges with updating land use plans and regulations to support the anticipated growth pattern. If adequate infrastructure is not provided, this growth may lead to increased low-density development outside of the urban areas and into rural areas. If adequate levels of affordable housing are not provided in urban areas, this could also lead to undesired sprawl in rural areas. Likewise, if adequate zoning capacity to support growth is not available in urban areas, it may lead to greater development outside of the urban area. If Rural and Resource Land geographies lack land use protections, greater development of those lands than anticipated by the growth alternatives may occur." (p. 115) Yes, local jurisdictions currently do and in the future will continue to face infrastructure and facility challenges. However, that is solvable if they would exercise their authority to ensure that new growth pays for new growth—that has not been happening as they have fallen further and further behind. This clearly is a failure to enforce GMA Concurrency—especially Transportation Concurrency. Should such failures by the cities occur, they should not serve as the rationale underlying any further enlargement of the Urban Growth Areas, especially with so many existing Potential Annexation Areas left un-annexed.</p> <p>4.2.3 Potential Mitigation Measures Regarding Table 4.2-1 (p. 116) under "Topic: Rural Lands, Resource Lands and Critical Areas": Examples should be provided to support: "Promote programs that support rural based economic development consistent with rural character." The following is not clear: "Provide for agricultural-related accessory uses on agricultural lands." We believe most of the acreage in the Rural Areas is zoned with a multitude of accessory uses already in the zoning code. We see no practicality, nor desire, to implement the following mitigation measure listed in Table 4.2-1 (p. 116): "Reduce allowed densities in rural areas outside of clustered development and areas where growth is desired." First, we do not support the urban-concept of "clustered development" in the Rural Areas. Second, implementing such measures as "reduce(d) allowed densities" would take major changes in zoning law, planning policies, regulations, etc. We support instead the mechanism of Transfer of Development Rights (TDRs). Also in Table 4.2-1 (p. 116): "Partner with nongovernmental organizations to preserve natural resource lands." We would like to see promotion of home-based occupations that are consistent with the Rural Area lifestyle and environment. The transfer of development rights (TDRs) from the Rural Area to existing Urban Areas should result in an overall lesser impact to the Rural Area. Use of private wells for single-family residential water supply in the Rural Area should: (a) continue to be exempt under and pursuant to RCW 90.44.050 and (b) not be subject to regulation, restriction, or limitation resulting from the State Supreme Court's Hirst decision and/or the legislative fix implemented under and pursuant to Ch 1, Laws of 2018 (ESSB 6091). Properly located, operated, and maintained onsite sewage systems in the Rural Area do not have an adverse impact on the water quality and biosystem of regional surface waters and Puget Sound, and thus should not be subject to any additional mitigating measures. Again, please note: SB 5503, Section 1, signed by Governor Inslee on April 17, 2019, and effective July 28, 2019 (Laws of 2019, Chapter 50).</p>	<p>Comments acknowledged. Mitigation measures were edited to reflect several of these comments.</p>

Commenter	Comment Number	Comment Text	Response
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	<p>31</p>	<p>4.3 Transportation (pp. 117-124)</p> <p>We first provide some general comments below: 1. State, County, and local governments must commit to enforcement of existing Growth Management Act (GMA) provisions, especially Transportation Concurrency, or the State should make enforceable improvements to the GMA; 2. Lack of an effective enforcement mechanism makes this mostly moot as a planning tool. Plus, invalid Growth Targets create false assumptions; 3. Inaccurate (e.g., using unrealistic assumptions or conducting at too high a level) traffic analyses create false assumptions; 4. Lack of a mitigation plan that identifies major regional capacity and system improvements to go along with the decade of growth that is assumed and evaluated; and 5. Rural Area residents are not included on the PSRC boards (or are “represented” by County Councilmembers, who primarily live in urban areas), leading to under- representation in the planning process.</p> <p>4.3.1 Analysis of Alternatives 4.3.1.1 Impacts Common to all Alternatives On p. 119, there are four bullets under the sentence: “The following geographic trends are similar across all alternatives..., it is anticipated that by 2050:” The fourth bullet states: “People who live in Cities &amp; Towns and Rural regional geographies travel the longest distances, spend the most time in a car each day, and spend the most time per year in congestion. This is due to dispersed land development patterns in these areas, greater distances to major job centers, and reduced access to transit. Yes, this is true, but more fundamentally, we believe it is due to weaknesses and “loopholes” (e.g., Level of Service Standards [LOSs] can be changed—“moving the goalposts”—and Highways of Statewide Significance [HSSs] are not subject to concurrency testing—we have spoken to State legislators who, inexplicably, did not know this was part of the HSS definition) in State Growth Management Act (GMA) Concurrency. We already have a tool that can be made to work, if it were improved and enforced. Further, we decry the practice of lowering LOS standards to artificially limit the apparent need for mitigation. We support the concept of expanding the transit system to provide people in low-density areas with an alternative to driving alone.</p> <p>4.3.1.2 Comparison of Alternatives The differences between the three alternatives is not all that great, but each are markedly better (especially the Table 4.3-2 [p. 120] “job accessibility” comparisons) than the “baseline” which represents our recent (2014) current situation. Unfortunately, this shows that our current situation is quite intolerable.</p> <p>4.3.3 Potential Mitigation Measures In Table 4.3-3 (p. 123) we see no new potential mitigation measures that would have appreciable effects on the region’s transportation infrastructure, nor its efficiency. More specifically, we provide the following comments on some of the 20 unnumbered bullets (which we numbered for clarity) below: #4 – “Adopt and implement policies that reduce the impacts of growth.” _—_ We recommend vigorous enforcement of Transportation Concurrency, yet such mechanisms do not seem to be in place. More importantly, concurrency would be largely unnecessary as a tool, if funding were adequate for true mitigation of all impacts without diluting the LOS standards. #13 – “Leverage data to improve understanding of system performance, resources, and program benefits.” _—_ We believe this needs further explanation, e.g., are there better data analysis tools to be explored? Are there better criteria? #16 - “Encourage cooperation between transit agencies and shared mobility providers (e.g. Uber, Lyft, Car2Go, and ReachNow) to improve first- and last-mile connections and expand mobility.” _—_ We believe this means that, due to an incomplete route, people would have to call a ride to get them the last 6 blocks, or mile or two to their final destination. We see this strictly as an urban problem that would have little application in the Rural Areas unless there is a corresponding increase in transit service to and from the Rural Areas.</p> <p>4.3.5 Significant Unavoidable Impacts This presupposes that jurisdictions properly enforce Transportation Concurrency, which they do not. It also neglects to acknowledge the built-in loopholes in GMA Transportation Concurrency, such as allowing a jurisdiction to simply change its Level of Service standards (e.g., “move the goal posts”). Finally, as long as Highways of Statewide Significance (HSSs) are exempt from meeting Transportation Concurrency, it will be nearly impossible to solve problems arising from ever-increasing traffic volumes.</p>	<p>PSRC boards include elected county officials that represent rural areas. PSRC is a council of governments that coordinates regional planning, and is not an enforcement agency. The Draft SEIS includes mitigation measures, which are reflected in many of the policies of VISION 2050.</p>
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	<p>32</p>	<p>4.4 Air Quality (pp. 124-127) Pollutant emissions are reduced with all alternatives. The principal observation is that each pollutant is reduced from the base year to any of the future alternatives, and there is little distinction to be found between the future alternatives per se. Unfortunately, the contribution to greenhouse gases (GHGs) is not reduced very much compared to other pollutants. We support measures that more strongly mitigate the effects of climate change. For example, the State government is now debating a goal of zero GHG emissions from electric power generation within a shorter time horizon than 2050. Such a similar goal could be adopted for transportation emissions by 2050. The automobile marketplace is already transitioning to electric vehicles. A regional policy goal of zero fossil fuel consumption by 2050 seems quite achievable. That would, in turn, tend to support more compact, transit-oriented patterns of urban development and lessen the appeal of commuting between rural homes and urban jobs.</p>	<p>Comments acknowledged.</p>
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	<p>33</p>	<p>4.5 Ecosystems (pp. 127-133) As with other topical areas, the Transit-Focused Growth alternative is preferred, because of its lessened impacts on ecosystems in the Rural Areas, urban unincorporated areas, natural resource lands, and critical areas.</p>	<p>Comments acknowledged.</p>

Commenter	Comment Number	Comment Text	Response
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	34	4.6 Water Quality and Hydrology (pp. 133-138) We recommend that the description of sea level rise with all alternatives more realistically recognize the science by changing: "may experience" to: "will experience" given the strong scientific consensus on climate change and, in fact, an alarming acceleration of concern about sea level rise in recent scientific publications (see any Scientific American for example). The news is not good. This, in turn, calls for a vigorous adjustment of regional plans to mitigate and reflection of true costs of adaptation to transfer development demand away from such areas.	The section has been updated.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	35	4.7 Public Services & Utilities (pp. 138-141) We concur with the summary statement that the Reset Urban Growth alternative: "has increased potential for the need to expand infrastructure and facilities into areas not currently served." However, we would change: "has increased potential" to: "will increase." It is far preferable to bolster the capacity of existing infrastructure in the Urban Growth Areas than to spread new infrastructure into Rural Areas. Currently, we have major concerns with the Cedar Hills Landfill as it reaches capacity. While the potential mitigation measures listed under Solid Waste in Table 4.7-1 (p. 141) are good, they could prove to be insufficient to handle the influx of so many more people and jobs into the region —with most going to King County, thus adversely impacting the landfill operations.	The SEIS has been updated in response to this comment.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	36	4.8 Parks & Recreation (pp. 142-146) We concur with the finding that the Transit-Focused Growth alternative provides the most access to parks for urban residents. We also concur with the discussion applicable to all alternatives that regional growth inevitably leads to increased demand on both urban and rural parks and recreation facilities. We are especially concerned about the increased impact on Rural Areas of urban residents accessing wild open spaces and other recreational facilities situated in Rural Areas. This calls for more regional support for facility improvements in the Rural Areas, since that cost burden should not be placed on the rural residents. Another possible mitigation strategy is to expand park and recreation facilities within the Urban Growth Areas, so as to shorten travel distances to reach such facilities and keep more such travel within the urban area.	VISION 2050 and the Regional Open Space Conservation Plan support improved access to parks, open space, and trails as described above.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	37	4.8.2 Cumulative Effects We are concerned by the statement that: "population growth and associated development may limit available land for development of parks, open space, and recreational facilities, creating competition for available land and higher land costs." To mitigate this adverse impact, we suggest the Urban Growth Areas place a first priority on setting aside sufficient land for new parks, et. al. before the development happens. This could have huge benefits for the future quality of life, if the will can be found to make the right decisions in the present. In fact, while some low-density residential areas in core cities are potential targets for high-density redevelopment, we recommend an effort be made to set aside some such areas to reclaim to lost open space in urban areas due to the lack of foresight by prior generations. For example, create new linear parks along urban streams to both provide recreational opportunity and restore some ecosystems at the same time that the surrounding low-density suburban areas become candidates for higher-density re-development. 4.8.3 Potential Mitigation Measures The potential mitigation measures in Table 4.8-1. Potential Mitigation Measures: Parks and Recreation Resources (p. 145) allude to such strategies, but what is needed is firm direction with strong enforcement.	A parks mitigation measure has been added as suggested.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	38	4.10 Energy (pp. 149-151) While the differences between the alternatives are small, more important are the over-arching concerns about climate change, which affect all alternatives.	Comment acknowledged.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	39	4.11 Historic, Cultural, & Archeological Resources (pp. 151-152) We strongly urge that outcomes from issues such as population increases and associated effects not be viewed as "unavoidable adverse impacts," but addressed as concerns that can be effectively managed to preserve the Rural Areas' many historic, cultural and archeological (HCA) resources. We support the Mitigation Measures listed in Table 4.11-1. Potential Mitigation Measures: Historic, Cultural, and Archaeological Resources (p. 152) and reproduced below. However, we believe they need to be strengthened, as well as equally and effectively enforced to avoid potential waiving of requirements. • Use local planning and zoning techniques to identify and protect historic and cultural resources* —This is necessary, but not sufficient due to undue growth pressures on the urban fringes near such HCA resources. • Provide tax incentives to encourage preservation and rehabilitation of historic and cultural resources* • Use fee simple acquisition or protective easements to control historic and cultural resources* —This also should include seeking and identifying HCA resources that have been overlooked or neglected.	Additional mitigation measures have been added to the SEIS as suggested.

Commenter	Comment Number	Comment Text	Response
		The region's Urban Growth Area boundaries adjacent to the Rural Areas, Heritage Corridors, and Agricultural Production Districts should be considered inviolate. We request a thorough deliberation and regard for proximity and impacts to HCA resources in all planning and permitting processes and urge that all measures be taken to protect and preserve these irreplaceable resources that attract tourism and give our communities a vital sense of identity and pride.	
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	40	4.12 Visual Quality (pp. 152-153) We support the Transit-Focused Growth alternative with respect to lessened impacts on Rural Areas. We support the potential mitigation measures in Table 4.12-1. Potential Mitigation Measures: Visual Quality (p. 153). As elsewhere, we see the need for increased enforcement power through proper legislation.	Comments acknowledged.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	41	4.14 Noise (pp. 154-155) We support the Transit-Focused Growth alternative with respect to lessened impacts on Rural Areas. We support the potential mitigation measures in Table 4.14-1. Potential Mitigation Measures: Noise (p. 155). As elsewhere, we see the need for increased enforcement power through legislation.	Comments acknowledged.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	42	5. Environmental Justice [ <a href="https://www.psrc.org/sites/default/files/v2050-dseis-chap5.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-chap5.pdf</a> ] (pp. 157-178) Certain populations are addressed here as meriting careful attention for impacts and appropriate mitigation—and we agree. Due to the adverse impacts of urban development on the Rural Areas, we believe “rural residents” should be considered as well. Such impacts are only alluded to and not fully described in the draft SEIS. To rural residents this is an important issue. The siting of urban-serving facilities in the Rural Area because the land is cheaper flies in the face of all State policies, as well as both regional, and county plans. Urban dwellers increasingly use rural recreational features as if they were city parks, clogging access roads and intruding upon rural neighborhoods. Urban dwellers increasingly use rural roads for commuter routes as bypass alternatives to severely overloaded urban arterial corridors. No urban neighborhood would tolerate such “cut-through” traffic and major cities have extensive programs of traffic management to deter such behaviors. Yet city-to-city traffic cuts through the Rural Areas every day, seeking a way around the congested urban corridors. Unfortunately, these facts go unnoticed and unmitigated by the various planning processes in place that allow such deviations to occur without mitigation, and then proclaim that the forecast travel demand on the major arterial corridor has been adequately planned. Rural Areas will be increasingly threatened until such effects are recognized and mitigated as a matter of justice.	Concur that rural residents are important to the region. This Environmental Justice analysis addresses Executive Order 12898 which refers to specific populations: minority and low-income populations. Comments on traffic impacts in rural area acknowledged. As suggested, these types of impacts support improving access to urban parks and open space.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	43	6. Multicounty Planning Policies [ <a href="https://www.psrc.org/sites/default/files/v2050-dseis-chap6.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-chap6.pdf</a> ] (pp. 179-181) 6.2 Multicounty Planning Policies and Potential Updates We reserve comments until proposed changes are publicly released, as stated below (p. 180): “For each topic area, Chapter 7 of the VISION 2040 FEIS summarizes the multicounty planning policies and describes their purpose and environmental effects. Input to date indicates that VISION 2040’s policies provide a strong foundation and should be largely retained, with select updates for emerging policy areas and changing conditions. Some changes are also proposed to strengthen or clarify policies. The multicounty planning policies will be revised to be consistent with the preferred Regional Growth Strategy alternative selected by the Growth Management Policy Board and will be included with the draft plan when it is released in summer 2019.” As Multicounty Planning Policies provide “a common, coordinated policy framework,” we request the Public be given sufficient time to review and comment on same and how they support the Regional Growth Strategy.	Comment noted. A 60-day comment period was held on VISION 2050, which included draft multicounty planning policies.
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	44	APPENDICES B — Supplemental Data Tables and Figures [ <a href="https://www.psrc.org/sites/default/files/v2050-dseis-appendixb-suppdatatables.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-appendixb-suppdatatables.pdf</a> ] Issaquah is a designated regional growth center. This designation tends to increase trends for traffic growth between Issaquah and areas to the south, both rural and incorporated cities. But PSRC’s Regional Transportation Plan (RTP) lacks any improvements to transportation capacity in that north-south corridor to serve such travel. The existing transportation infrastructure is overburdened as a result. Rural Area residents are made to pay the price for urban growth. Finally, King County has insufficient roads “maintenance” budget to accommodate all the urban pass-through commuter traffic on such “county” roads. Average Annual Vehicle Delay Hours per resident increases with all three alternatives. This is apparently related to the absence of sufficient mitigation measures. In percentage terms, Rural Area residents are the most adversely affected. This relates to the absence of capacity improvements in the urban commuter corridors, whether road capacity or transit capacity. Transit boardings are, of course, highest with the Transit-Focused Growth alternative, that the difference from the Stay the Course alternative is only 5%, hardly a dramatic shift. This emphasis, within the urban areas, apparently links to the lessened growth pressure on rural areas. However, this must be assured. The methodology indicates that planners simply assume less growth in Rural Areas, not that the Transit-Focused Growth alternative actually will be effective in achieving that goal. Policies and laws to assure such trends should be identified. Top candidates include firm enforcement of Growth Targets for all areas, and enhanced transit service linking the Rural Areas with urban jobs. The share of commute trips by mode indicates a dramatic shift toward walking and bicycling to work by 2050. The Single-Occupant-Vehicle (SOV) share drops markedly as a result. Still, given a near 50% population increase between 2014 and 2050, total trips on the road still increase around 25%-30%. More cars on the same roads directly explains why the average delay per person increases over that time period as well. There must be offsetting mitigation improvements to reduce delay. As adding road capacity is deemed	The VISION 2050 SEIS analyzed the impacts of various growth alternatives, keeping the existing planned transportation network to 2040 constant. The Regional Transportation Plan is updated every four years, and the 2022 update will address potential new investments to respond to the additional growth.

Commenter	Comment Number	Comment Text	Response
		<p>undesirable—something with which we agree, then the transit system should be expanded sufficiently to divert the growth in riders to transit. Lacking that emphasis, the regional plan is not a balanced plan. The table of travel times by major corridors lacks comparable measures for a base year, making it difficult to ascertain how much difference each alternative actually makes. And the growth in travel times would be correlated to the average delay measures. The table of Impervious Surfaces should be reformatted for consistency with most other tables. It stands alone as listing the incremental change from the base year, whereas most other tables give actual measures for the base year and the year 2050. Alternatively, the wording in the title should be changed to more clearly emphasize this distinction. The table addressing population in proximity to parks underestimates the impact of urban growth on the Rural Areas. The increasing urban population, coupled with a fixed amount of natural environment, implies a rather large impact of additional traffic, parking, and related services for all recreational/park sites in the Rural Areas. This should be discussed. For example, there are growing congestion and safety problems on Issaquah Hobart Road at the hang-glider field, due to an exploding number of hikers coming from urban areas to use the hang-glider trail up to Poo Point. As a result, the parking area is often full and unavailable to the hang glider community, in addition to the traffic issues. This is a fairly recent development, and thus a good example of a growth-driven problem.</p>	
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	<p>45</p>	<p>C — Modeling Methodology and Analysis Tools <a href="https://www.psrc.org/sites/default/files/v2050-dseis-appendixc-modelingmethodology.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-appendixc-modelingmethodology.pdf</a></p> <p>The data and charts in Figures C.2-2 and -3 demonstrate that the regional plans for growth direction have failed to deliver on their promises. Less growth is happening in urban areas, and more growth is happening in rural areas, than plans provided for from 2000 to 2017. This is actually a long-standing pattern evident in trends since the 1970's when urban sprawl was first defined as a negative. Urban planners envision concentrated growth in the core areas of the region — and Rural Area residents would be quite happy for urban growth to follow those visions — but the development marketplace persists in a less concentrated direction, primarily to accommodate urban workers seeking lower cost housing at a distance from their jobs. Clearly, stronger mitigation requirements are needed to succeed in achieving the planners' vision. Those requirements, most likely, must be made as changes to State law, since local governments have shown, since 1990, that they are ill-equipped to actually manage growth properly. The methodology description surrounding Table C.2-9 indicates PSRC made many technical assumptions to implement the outline of each alternative. For example: "To model the Stay the Course alternative, PSRC developed jurisdiction-level growth assumptions based on VISION 2040 regional geographies." And after Figure C.2-4 it states: "Selected manual adjustments were made to the employment growth allocations to better reflect the intended policy goals of the Transit Focused Growth alternative. And in one last step, the 5 percentage point jobs shift across counties was implemented, which shifts more future job growth to Kitsap, Pierce, and Snohomish counties from King County." These statements show that staff considered the total growth potential in each jurisdiction in each regional geography, and then assumed a certain distribution for each jurisdiction. While such assumptions are understandably necessary, there is no presentation of data to show the range of possible assumptions that might have been made, or by what means was the region-wide distribution of growth made to treat each jurisdiction consistently and fairly? Some information to explain this range of possibilities would be most helpful. In section C.2-4 the text (see p. C-20) seems to acknowledge the weakness of these assumptions by stating: "The difference [in growth] can be pronounced for certain regional geographies." In section C.2-5 the discussion of modeling in UrbanSim identifies a most disturbing assumption: the use of county-wide growth targets as a control (see p. C-23). "In this approach, growth targets serve as a proxy for shared understanding between local jurisdictions as to the relative role each plays in accommodating their respective county's future growth." Unfortunately, this means that when a jurisdiction such as the City of Black Diamond intends to develop to a much, much higher level than the growth target assigned to it by the regional planning processes, that intention is not captured in the modeling process at all. Thus, even though the Reset Urban Growth alternative aims to reflect a continuation of actual development trends, it still does not take into account the actual intentions of Black Diamond. It still limits the Black Diamond jurisdictional forecast to the region's growth target, which is far, far less than Black Diamond's plans. As a result, the impacts of Black Diamond's plans are never accounted for in any forecasting and analysis of traffic or other impacts on regional and local facilities. We have witnessed in the past year alone that intensive analysis of traffic issues in and around the City of Issaquah on I-90, SR-18, and Issaquah-Hobart Road were described as using the latest regional forecasts. The authors of those studies appeared to be unaware that the regional forecasts they relied on failed to consider the largest impending source of new traffic in the study area. They were led astray precisely by this policy approach of relying on countywide totals and regionally endorsed distributions, when the City of Black Diamond shows no intention whatsoever to adhere to that distribution. As things now stand, the eventual result will be that the City of Issaquah is inundated by traffic increases to/from the south that seem to "come from nowhere" because the "official" regional forecasts fail to "connect the dots" properly. This is rapidly becoming the current case even before the massive Black Diamond developments are built and occupied!</p>	<p>While past growth is not perfectly aligned with the Regional Growth Strategy of VISION 2040, it is largely consistent at a regional scale and growth levels in rural areas are sharply lower than in past decades. The Regional Growth Strategy Trends document available on the VISION 2050 website provides information about past performance.</p>
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	<p>46</p>	<p>D — Evaluation Criteria for Selecting a Preferred Growth Alternative [<a href="https://www.psrc.org/sites/default/files/v2050-dseis-appendixd-evaluationcriteria.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-appendixd-evaluationcriteria.pdf</a>]</p> <p>VISION 2050 Outcomes We support all thirteen (13) outcomes listed, especially the last one: "Rural Areas. Rural communities and character are strengthened, enhanced, and sustained."</p> <p>Evaluation Criteria Development Patterns (p. D-3) We do not understand why one of the evaluation criteria includes: "Growth in proximity to the urban growth boundary (population and employment within one-quarter mile of both sides of the urban growth boundary)" This implies that it is desirable to develop on the rural side of the Urban Growth Boundary in violation of the State's Growth Management Act. We adamantly disagree with this premise.</p>	<p>Growth in proximity to the urban growth boundary is a measure to look at rural development pressure. More growth on either side of the urban growth boundary is considered a greater impact.</p>
<p>Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC</p>	<p>47</p>	<p>F — List of Preparers <a href="https://www.psrc.org/sites/default/files/v2050-dseis-appendixf-preparers.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-appendixf-preparers.pdf</a></p> <p>We are surprised to see no Climate specialists on the Preparers' List.</p> <p>G — Distribution List <a href="https://www.psrc.org/sites/default/files/v2050-dseis-appendixg-distributionlist.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-appendixg-distributionlist.pdf</a></p> <p>Thank you for including the GMVUAC on the Distribution List. In the future, please include all our organizations as listed on our Cover Letter herein.</p>	<p>Organizations have been added as requested.</p>

Commenter	Comment Number	Comment Text	Response
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	48	<p>H — Equity Analysis [<a href="https://www.psrc.org/sites/default/files/v2050-dseis-appendixh-equityanalysis.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-appendixh-equityanalysis.pdf</a>]</p> <p>Environmental Justice (see p. H-3) is described as: “equal protection...regardless of race, ethnicity, or economic status. ... no population of people should be forced to shoulder a disproportionate share of ... impacts...due to a lack of political or economic strength. ... Environmental justice promotes equal access to the decision-making process to have a healthy environment in which to live, learn, and work.” The text lists over 22 specific populations that may be considered. We support these principles.</p> <p>We believe these principles apply to Rural Area residents as well, because the fundamental criteria for justice apply to them as well. As described several times in our comments herein, the interests of Rural Area residents are so often systematically omitted from regional planning. Rural Area residents find themselves bearing adverse impacts of urban growth without recognition by the region that those impacts occur. Rural voices are little provided for in the governmental structures, and at the regional level, not at all. In King County alone, the rural population is nearly equivalent in size to that of the its second largest city—Bellevue. Yet, Rural Area residents are afforded less representation than most cities. Clearly, this is not just.</p>	See responses above.
Pierce Transit	1	<p>To whom it may concern:</p> <p>Pierce Transit is pleased to provide comments on the Draft Supplemental Environmental Impact Statement (DEIS) for the upcoming Vision 2050 Long Range Plan. After careful review of the document, while focusing on the various sections most relevant to transportation and transit, we would like to share the following comments or questions. References to specific language or tables found in the Vision 2050 document are cited in parentheses.</p> <p>If the Transit Focused Alternative were adopted, would Pierce County show an increase (from the current 20 percent, as in Snohomish County) of employment within high capacity transit areas? (Sec. 2.4.3 TOD, p. 30)</p> <p>Pierce Transit's long-term strategy is to create a network of four BRT routes that interconnect to both fixed routes and regional transit. This would, in turn, raise the percentages of population and employment in proximity to HCT well above the 14 percent shown in Table 2.4.2. (Sec. 2.4.3 TOD, p. 31)</p> <p>Even under the Transit Focused Growth alternative, we note that the 2050 Population and Employment projections for both Rural and Urban Unincorporated areas of Pierce County are higher than what is projected for the region as a whole. And we agree with those assumptions. (Sec. 3.3, Fig. 3.3-1, p. 89)</p> <p>We observed that population growth in the three scenarios only vary by 14 percent when you combine Metropolitan Cities, Core Cities, and HCT Communities. As expected, the Transit Focused Growth alternative is the highest at 88 percent. In tandem, Cities &amp; Towns, Urban Unincorporated, and Rural combine for the other 12 percent. By comparison, that combined total is 19 percent in the Stay the Course alternative.</p> <p>We also find it interesting that employment projections by subarea type are almost identical in both the Transit Focused Growth and Stay the Course alternatives. As such, with 92 percent of employment focused on urban areas in both alternatives, it makes perfect sense for transit agencies to plan to ramp up services to meet the growing demand in those cities and communities as well. (Sec. 3.5 Alternatives Comparison, Table 3.5-1, p. 92)</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. As shown in Appendix B in the Draft SEIS, for the Transit Focused Growth Alternative, 66% of population and employment growth would be in proximity to high-capacity transit in Pierce County.
Pierce Transit	2	<p>We find it interesting that the SoundCast travel model proves that "Overall transit ridership is forecast to more than double," regardless of which alternative is ultimately advanced. However, does the model still show the longest commute times and distances for Pierce County residents in Horizon Year 2050, even under the Transit Focused Growth alternative? If so, we'd suggest explaining why this isn't subject to change over the long term, even with the Tacoma Dome Link Extension, Sounder extension to DuPont, and Pierce Transit's BRT network completed and in operation by then. (Sec. 4.3.1.1 Impacts Common to AU Alternatives, pp. 118-119)</p> <p>More data that strongly support the Transit Focused Growth alternative, especially for Pierce County, are provided in this Table 4.3-2 (p. 120). It is of interest to note that this alternative would rectify the huge imbalance between Pierce and King Counties under the "transit-accessible jobs" metric. By example, today's Baseline shows almost 9.6 times as many jobs accessible via transit in King County than in Pierce County. That ratio is reduced to 4.8 times higher in 2050; essentially cut in half under the Transit Focused Growth alternative. With the jobs-housing balance seriously lacking in three of the four counties within the region today, this alternative demonstrates the most effective method for correcting the imbalance not only for Pierce County, but for Kitsap and Snohomish Counties as well. This comparison and narrative are presented further at the beginning of Table 5.5-1 on page 173.</p>	Comment acknowledged. The updated analysis indicates that the average travel times and distances for Pierce and Snohomish are still expected to be longer compared to King and Kitsap counties. Average daily travel distances are highest for Snohomish County residents under all alternatives. A more concentrated land use pattern as well as increased transit ridership contribute to improvement compared to the baseline in every county for these measures.
Pierce Transit	3	<p>We feel this deserves a more detailed explanation as to why this alternative only models a slight decrease in emissions when compared to Stay the Course. Most readers would assume the Transit Focused Growth alternative's modeling results would show substantially reduced greenhouse gas (GHG) emissions, especially when reviewed against the data and analysis mentioned in Table 4.3-2 on page 120 above. (Sec. 4.4.1.4 Impacts of the Transit Focused growth Alternative, p. 125)</p>	The SEIS analyzes various growth alternatives assuming the adopted transportation network to 2040. The 2022 Regional Transportation Plan will look to potential new investments to further support growth out to 2050.
Pierce Transit	4	<p>The Current Demographics section (5.4.2, pp. 163-168)) clearly and succinctly shows the makeup and locations of various minority and low-income populations who are often transit dependent. Pierce Transit appreciates seeing the US Census' American Community Survey data provided by race, Hispanic/Latina origin, and below poverty thresholds by county. It would be of further interest to our agency to see Figures 5.4-1 and 5.4-2 (pp. 166-167) with the future HCT network overlay (i.e., the regionally connected system to be built out by 2050), in order determine if the planned, highest cost transit expansion projects will directly serve those with potentially the greatest need. This comparison and narrative are presented further in Table 5.5-1 on page 174.</p> <p>Another argument for the Transit Focused Growth alternative is cited in the Transportation Equity section (5.4.5). Transit investments benefit people of color and those with low incomes to a greater extent than to the region as a whole. We therefore owe it to these communities to provide equitable, fast, safe, frequent, and reliable transportation options to those citizens who continue to demonstrate the greatest demand for local or regionally-connected transit. This comparison and narrative are presented further in Table 5.5-1 on page 173.</p> <p>Pierce Transit commends the PSRC for recognizing a growing concern for communities of color and low income populations. And that is the national reality that as older and well-established urban neighborhoods gentrify or are rezoned to accommodate higher densities and mixed used development, albeit marketed as "transit-oriented," residents with long established histories can be priced or forced out of their homes. Not only recognizing displacement risk, but clearly offering alternatives (beyond "No build; Do not redevelop or rezone") or actions cities and counties can take to assure continuity and affordability to its most vulnerable residents is supplemental information that should be provided as part of this document as well. (Table, 5.5-1, p. 175)</p>	Thank you for the suggestion to overlay the future HCT network with demographic information. PSRC has developed an Opportunity Mapping Tool ( <a href="https://www.psrc.org/opportunity-mapping">https://www.psrc.org/opportunity-mapping</a> ). PSRC will provide the current and future HCT network as a layer to use with this tool to help examine how transit serves areas of varying levels of opportunity.

Commenter	Comment Number	Comment Text	Response
Pierce Transit	5	<p>After carefully reviewing the draft SEIS and weighing the three proposed growth alternatives against each other, Pierce Transit staff feels that the Transit Focused Growth alternative most closely aligns with our agency's future vision for the region. In addition, it seems the most viable alternative for managing growth in a major metropolitan area where the Puget Sound Regional Council's own predictions for population, jobs, and commute travel times have continuously proven to be much too conservative. No matter how much growth we collectively plan for, it is a safe assumption that it will happen much sooner than we can predict. Vision 2050 offers us a realistic and viable alternative.</p> <p>In closing, thank you for your consideration of these comments and our recommended growth alternative as you begin to develop the draft Vision 2050 document for release in June 2019.</p> <p>Sincerely,</p>	Pierce Transit's preference for the Transit Focused Growth alternative has been acknowledged.
Pierce Transit (staff comment)	1	<p>Communication Text: 354817</p> <p>Paul – I also shared the attached with Liz in person on Wednesday and thought you may want to review a copy too.</p> <p>Please note that they do not necessarily reflect the opinions of Pierce Transit's management.</p> <p>Instead, any suggested corrections or revisions to the Vision 2050 Draft SEIS in this matrix that were not specifically listed in the formal comment letter I just sent too are mine alone.</p> <p>I hope you still find them helpful!</p> <p>Darin L. Stavish, AICP Principal Planner</p> <p>Suggested Edits/Revisions</p> <p>Page Section/Figure/Table Comments and Suggested Revisions</p> <p>ES-9 Transit Focused Growth Alternative The planning literature consistently cite a half-mile radius walkshed for access to HCT systems or stations. A quarter-mile radius is cited for local, fixed route bus stops only. That is, we've always understood that transit patrons will generally walk up to a half-mile (or more) to access any high capacity transit system or mode, such as light rail, commuter/regional rail, bus rapid transit, and ferries.</p> <p>30 2.4.3 TOD Same comment as above. Suggest BRT walksheds or catchment areas be increased to one-half mile.</p> <p>ES- 10 Comparison of Alternatives Table ES- 1 Some of the six cells with percentages don't add up to 100% (See Stay the Course – Where would employment go? which sum to 101%). Perhaps add a footnote to the table?: Percentages may not add to 100, due to rounding.</p> <p>30 2.4.3 TOD If the Transit Focused Alternative were adopted, would Pierce County show an increase (from the current 20 percent, as in Snohomish County) of employment within high capacity transit areas?</p> <p>31 2.4.3 TOD PT's short- and long-term strategy is to create a network of four BRT routes that interconnect to both fixed routes and regional transit. This would, in turn, raise the percentages of population and employment in proximity to HCT well above the 14% shown in Table 2.4.2.</p> <p>32 2.5.1 Transportation System Capacity Improvements Under Transit heading: Change "...have updated their development plans to meet the needs..." to "Long Range Plans." The Transit Development Plans are an annual requirement for WSDOT that only show six-year budgets and short-term projects forecasting.</p>	Definition of walksheds for individual stations should occur through local station area planning. Distances for walksheds used in VISION 2050 are for regional-scale modeling and planning purposes and do not reflect individual station plans or limit actions at the local level. See response above on population and employment in high-capacity transit areas. The SEIS has been updated to address the rounding and long-range plan comments.
Pierce Transit (staff comment)	2	<p>89 3.3 Transit Focused Growth Alternative Figure 3.3- 1: Even under this alternative, we note that the 2050 Population and Employment projections for both Rural and Urban Unincorporated areas of Pierce County are higher than what is projected for the region as a whole. And we agree with those assumptions.</p> <p>92 3.5 Alternatives Comparison Table 3.5- 1: We observed that population growth in the three scenarios only vary by 14 percent when you combine Metropolitan Cities, Core Cities, and HCT Communities. As expected, the Transit Focused Growth alternative is the highest at 88 percent. In tandem, Cities &amp; Towns, Urban Unincorporated, and Rural combine for the other 12 percent. By comparison, that combined total is 19 percent in the Stay the Course alternative. We also find it interesting that employment projections by subarea type are almost identical in both the Transit Focused Growth and Stay the Course alternatives. As such, with 92 percent of employment focused on urban areas in both alternatives, it makes perfect sense for transit agencies to plan to ramp up services to meet the growing demand in those cities and communities as well.</p> <p>94-96 Figures 3.5-2 to 3.5-4 The Population Distribution dot density maps by alternative are too small and hard to read. We'd suggest zooming in by county or only showing one county per page/map. Either that or, at a minimum, enlarge all three to 11" x 17" portrait pages and add them to the appendices.</p>	Comments acknowledged. Maps included in the Draft SEIS are illustrative of regional-scale conditions. PSRC mapping data is available for agencies to access for planning work at the county or subarea level.
Pierce Transit (staff comment)	3	<p>118 4.3. 1. 1 Impacts Common to all Alternatives We find it interesting that the SoundCast travel model proves that "Overall transit ridership is forecast to more than double," regardless of which alternative is ultimately advanced. However...</p> <p>119 4.3. 1. 1 Impacts Common to All Alternatives ...does the model still show the longest commute times and distances for Pierce County residents in Horizon Year 2050, even under the Transit Focused Growth Alternative? If so, we'd suggest explaining why this isn't subject to change over the long term, even with the Tacoma Dome Link Extension, Souder extension to DuPont, and Pierce Transit's BRT network completed and in operation by then.</p>	See responses above on commute times and distances.
Pierce Transit (staff comment)	4	<p>120 Table 4.3- 1 We'd suggest it would help to include greenhouse gas emission levels for the 2014 Baseline plus the three 2050 growth alternatives in this table. Since climate change is a rapidly growing concern in the region and is emphasized in Vision 2050, if not here, we'd still suggest providing a comparison of forecast or estimated GHG emission levels by alternative somewhere in the document, if you haven't already. Perhaps note that it is provided later in the document in Table 4.4- 1 on page 125?</p>	Greenhouse gas emissions for the baseline and alternatives has been included in the SEIS Executive Summary and Air Quality section.

Commenter	Comment Number	Comment Text	Response
Pierce Transit (staff comment)	5	<p>120 Table 4.3-2 More data that strongly support the Transit Focused Growth Alternative, especially for Pierce County, are provided in this table. It is of interest to note that this alternative would rectify the huge imbalance between Pierce and King Counties under the “transit-accessible jobs” metric. By example, today’s Baseline shows almost 9.6 times as many jobs accessible via transit in King County than in Pierce County. That ratio is reduced to 4.8 times higher in 2050; essentially cut in half under the Transit Focused Alternative. With the jobs-housing balance seriously out of balance in three of the four counties within the region today, this alternative demonstrates the most effective method for correcting the imbalance not only for Pierce County, but for Kitsap and Snohomish Counties as well. This comparison and narrative are presented further at the beginning of Table 5.5-1 on page 173.</p> <p>123 Table 4.3.3 Tenth bullet on the list: ORCA is an acronym so should be all capital letters. You have it spelled “Orca.” You might also suggest analyzing and potentially converting current signalized intersections to roundabouts, especially on Washington State Highways or Routes. See WSDOT Design Manual as updated October 2018, Chapter 1300 – Intersection Control Type <a href="http://www.wsdot.wa.gov/publications/manuals/m22-01.htm">www.wsdot.wa.gov/publications/manuals/m22-01.htm</a></p>	Comments acknowledged. Orca has been changed to ORCA in the SEIS.
Pierce Transit (staff comment)	6	<p>125 Table 4.4-1 Suggest converting (dividing) the Base Year (annual) data to Tons per Day too for a more accurate, side-by-side comparison of current conditions to the three growth alternatives.</p> <p>125 4.4.1.2 Comparison of Alternatives Correct “Supporting data is shown...” to are shown; data is the plural form of datum. (You have it used correctly on page 165, third paragraph, second sentence: “these data.”)</p> <p>125 4.4.1.4 Impacts of the Transit Focused Growth Alternative We feel this deserves a more detailed explanation as to why this alternative only models a slight decrease in emissions when compared to Stay the Course. Most readers would assume the Transit Focused Growth alternative’s modeling results would show substantially reduced GHG emissions, especially when reviewed against the data and analysis mentioned in Table 4.3-2 on page 120 above.</p> <p>127 Table 4.4-2 Topic: Localized Emissions Suggest fleshing out last bullet to read: · Implement and enforce “No Idling!” policies at transit centers or stations, ferry terminals, airports, CBDs, and other places where people routinely wait in their vehicles for extended periods of time. The Puget Sound Clean Air Agency calls positive, personal actions to curtail air pollution like these “low hanging fruit.”</p>	In Table 4.4-1, all amounts shown are in tons per day, including the base year. Statement has been changed to “Supporting data are shown...” See response above on greenhouse gas emissions. The suggested mitigation measure has been added to the SEIS.
Pierce Transit (staff comment)	7	<p>163-168   5.4.2 Current Demographics   This section clearly and succinctly shows the makeup and locations of various minority and low-income populations who are often transit dependent. Pierce Transit appreciates seeing the ACS data provided by race, Hispanic/Latino origin, and below poverty thresholds by county. It would be of further interest to our agency to see Figures 5.4-1 and 5.4-2 (pp. 166-167) with the future HCT network overlay (i.e., the regionally connected system to be built out by 2050), in order determine if the planned, highest cost transit expansion projects will directly serve those with potentially the greatest need. This comparison and narrative are presented further in Table 5.5-1 on page 174.  </p> <p>169-170   5.4-3 Equity Geographies 5.4.4. Displacement Risk and Growth Pressure   Same mapping suggestion as above for Figures 5.4-3 and 5.4-4.  </p> <p>172 5.4.5 Transportation Equity Another argument for the Transit Focused Growth alternative is cited in this section. Transit investments benefit people of color and those with low incomes to a greater extent than to the region as a whole. We therefore owe it to these communities to provide equitable, fast, safe, frequent, and reliable transit services to those citizens who continue to demonstrate the greatest demand for local or regionally-connected transit. This comparison and narrative are presented further in Table 5.5-1 on page 173.</p> <p>175 Table 5.5-1 Pierce Transit commends the PSRC for recognizing a growing concern for communities of color and low-income populations. And that is the national reality that as older and well-established urban neighborhoods gentrify or are rezoned to accommodate higher densities and mixed used development, albeit marketed as “transit-oriented,” residents with long established histories can be priced or forced out of their homes. Not only recognizing displacement risk, but clearly offering alternatives (beyond “No build; Do not redevelop or rezone”) or actions cities and counties can take to assure continuity and affordability to its most vulnerable residents is supplemental information that should be provided as part of this document as well.</p>	See responses above on Environmental Justice.
Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett	1	<p>Re: Comments on Draft Supplemental Environmental Impact Statement for Vision 2050 Plan</p> <p>Dear Chair Mello,</p> <p>Thank you for the opportunity to provide comments on the Draft Supplemental Environmental Impact Statement (SEIS) for Vision 2050. This letter and the attached detailed comments represent the collective perspective of the ports of Bremerton, Everett, Seattle and Tacoma along with The Northwest Seaport Alliance. Our programs touch the lives of Puget Sound residents in numerous ways, ranging from economic engines such as the state’s largest cargo terminals to quality of life through our travel and recreation facilities.</p> <p>Our mission is to create good jobs across the state by advancing trade and commerce, promoting manufacturing and maritime growth, and stimulating economic development. The Growth Management Act recognized the importance of our facilities by designating them as essential public facilities, both the maritime ports and Sea-Tac International Airport. Our ports and The Northwest Seaport Alliance are assets of statewide significance, serving as national and international gateways for travelers, trade and tourism. These facilities have developed over decades, with unique interactions among existing land uses and critical transportation infrastructure. These gateways cannot be replicated elsewhere and provide a crucial function in the resiliency of our state’s economy.</p> <p>A central issue in the SEIS alternatives analysis is how to achieve a better jobs-housing balance in each of the communities across the region. We share in this goal and we recognize its numerous benefits. Of course achieving a jobs-housing balance is a complex task involving matters such as diversified industries, wage profiles, and housing costs.</p> <p>For this reason we highlight the importance of the region’s industrial lands and the family-wage jobs they sustain. The 2019 Port of Seattle, Port of Tacoma, and The Northwest Seaport Alliance Economic Impact Analysis found that jobs in the marine cargo business have an average annual pay of \$99,662. Switching to a statewide view, the 2017 Washington State Maritime Sector Economic Impact Study found that maritime industries support 191,000 jobs in the state when upstream support chain transactions (indirect effects) as well as maritime-related income expenditures (induced effects) are included. The discussion of industrial lands in the PSRC Centers</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS.

Commenter	Comment Number	Comment Text	Response
		<p>Framework project attracted a great deal of attention from cities across the region. This is a testament to industrial centers' status as assets to the regional economy and the need for continued protection.</p> <p>Unfortunately the planning needs of industrial centers seemed to be repeatedly forgotten in recent discussions about Vision 2050 policy development at PSRC's Growth Management Policy Board. Housing issues have been a focus – as they should be – but the Board's zeal to address housing has led to us to repeatedly point out consequences for Manufacturing / Industrial Centers (MIC's). Typical cases involve policies that would prescribe housing at all high capacity transit station areas or at brownfield sites. Both are inappropriate when the areas are located within MIC's.</p> <p>We invite you to review the attached detailed comments and look forward to working with you, the GMPB and additional stakeholders on Vision 2050.</p> <p>Sincerely, Commissioner Peter Steinbrueck</p> <p>Port of Seattle Commissioner and Northwest Seaport Alliance Managing Member GMPB Ports Representative</p> <p>Attached: Detailed Comments on Vision 2050 Draft SEIS Vision 2050 SEPA scoping letter, March 19, 2018</p>	
Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett	2	<p>Detailed Comments: Vision 2050 Draft SEIS</p> <p>The ports of Bremerton, Everett, Seattle and Tacoma, along with the Northwest Seaport Alliance, are pleased to submit these detailed comments on the Vision 2050 Draft SEIS.</p> <p>Purpose and Need, Section 1.2 The current purpose and need statements do not address some of our biggest concerns: incompatible land uses near our facilities in the MICs, and the need to maintain and improve freight mobility, so that our economy can continue to grow. We request the following change in the objectives for the Regional Growth Strategy identified by the Growth Management Policy Board:</p> <ul style="list-style-type: none"> <li>• Build transit-oriented development around planned infrastructure consistent with underlying land use designations.</li> </ul> <p>The Growth Management Policy Board also identified desired outcomes for VISION 2050. Please revise the Mobility and Connectivity outcome to include freight:</p> <ul style="list-style-type: none"> <li>• Mobility and Connectivity. A safe, clean, integrated, affordable, and highly efficient multimodal transportation system reduces travel times, promotes economic and environmental vitality, efficiently moves freight, connects people, and supports the Regional Growth Strategy.</li> </ul>	Comments acknowledged. The mobility and connectivity outcome was updated to add goods.
Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett	3	<p><b>** Affected Environment / Regulatory Environment, Section 2</b></p> <p>The description of changes in affected environment does not include reference legislation that is important to the Ports, and Vision 2050 sure thrive to ensure that its goals are met. In 2009 the Washington State legislature added RCW 36.70A.085, finding that Washington's marine container ports operate within a complex system of marine terminal operations, truck and train transportation corridors, and industrial services that together support a critical amount of our state and national economy, including key parts of our state's manufacturing and agricultural sectors, and directly create thousands of high-wage jobs throughout our region. It is also concerned about other, larger ports in Washington, including the Port of Everett and Bremerton.</p> <p>The legislature further found that the container port services are increasingly challenged by the conversion of industrial properties to nonindustrial uses, leading to competing and incompatible uses that can hinder port operations, restrict efficient movement of freight, and limit the opportunity for improvements to existing port-related facilities. In explaining the need for RCW 36.70A.085, the legislature wrote:</p> <p>"It is the intent of the legislature to ensure that local land use decisions are made in consideration of the long-term and widespread economic contribution of our international container ports and related industrial lands and transportation systems, and to ensure that container ports continue to function effectively alongside vibrant city waterfronts."</p> <p>Please revise Table 2.17-1 to include these, for the Ports, critical change to the GMA, and ensure that its intent is supported in the alternatives, policies, and mitigation measures.</p>	Table 2.17-1 has been updated as suggested.
Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett	4	<p><b>Land Use—Description of Transit-Oriented Development, Section 2.4.3</b></p> <p>This section needs to include a description of what is meant by transit-oriented development (TOD), and a recognition of underlying land use designations that may mean TOD looks different at each High Capacity Transit location. This is especially true for MICs, where housing is expressly prohibited.</p>	Section 2.4-3 has been updated as suggested.
Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett	5	<p><b>Regional Geographies, Section 3.1.2</b></p> <p>We have followed the process leading to the recognition of Major Military Installations with interest, and are applauding their inclusion in the Regional Geographies. Ports and airports have similar challenges. Recognition of the four Ports and Major Airports, similar to Major Military Installations would be appropriate.</p> <p>The planning challenges faced by military bases are very familiar to ports. We are concerned that are not adequately addressed by existing RGA plans and policies, as expressed in our scoping letter for Vision 2050. From our perspective, there is a lack of recognition of the need to protect these economic development assets. Current draft policies, and the mitigation measures proposed in the DSEIS, do not sufficiently protect our ability to function.</p> <p>The Department of Commerce just released a draft guidebook on military land use compatibility<sup>1</sup> to help cities plan in accordance with the Washington State Growth Management Act (GMA). Its content is intended to address challenges and opportunities related to balancing the military's need to operate safely and community interests within a shared landscape. A similar effort geared towards ports in Puget Sound is needed.</p> <p><sup>1</sup> <a href="https://deptofcommerce.app.box.com/s/ccvku9omtj20le4zzkum4fesvh0mv49">https://deptofcommerce.app.box.com/s/ccvku9omtj20le4zzkum4fesvh0mv49</a></p>	VISION 2050 identifies Major Military Installations and Tribes because they are separate geographic and governmental entities that are not required to plan under the state Growth Management Act, yet where coordination with jurisdictions is important. While ports have similarities, port districts overlap and are on top of city and county jurisdictions, which are the geographic entities allocated growth and required to prepare comprehensive plans. VISION 2050 continues to support protection of industrial lands and to avoid incompatible land uses.

Commenter	Comment Number	Comment Text	Response
Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett	6	<p>Evaluation Criteria, Appendices C and D Baseline Assumptions and Methodology</p> <p>Appendix C, outlining the Modeling Methodology and Analysis Tools, shows that each model used to determine the outcome of the alternatives is based on assumptions that may, or may not, reflect reality. Models do what the name implies: They attempt to model future outcomes and can only provide an approximation of those future outcomes. The data provided in Table ES-3 indicate that for many criteria, the difference in outcomes across alternatives would appear well below the margin of error. We understand that it is difficult to get more precise data, and models that support more realistic forecasts. Maybe a scenario analysis approach would help the region better understand the range possible outcomes?</p>	<p>PSRC's models, as utilized for analyzing the VISION 2050 alternatives, are not currently structured to produce common statistical measures of significance or margins of error. The models have however been tested and validated against real world estimates such that they provide reasonable confidence in the directionality of model results compared between two or more scenarios. A protocol based on evaluating both the absolute and percentage difference between modeled indicators was used to determine whether values are distinct, slightly distinct, or essentially similar.</p>
Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett	7	<p>Selected Criteria</p> <p>In reviewing Table ES-3, which is intended to summarize the performance of the different alternatives, we are struck by the fact that appears to treat each criterion with the same weight. Yet, some criteria clearly do not reflect a high priority for the region. An example is the "Visual Quality" criterion, which infers that any type of multi-family housing is always preferable to single family housing in more rural areas. From our perspective, this is a highly subjective assessment. The very same table also acknowledges that increases in high-density housing also increase the risk of displacement. Which criterion is more important? Please work with the member jurisdictions to determine priorities before work on the EIS begins. That may also help focus limited staff and modeling resources on the most critical issues that must be addressed. It would also be helpful if future documentation could include the rationale for seemingly subjective evaluation such as the above.</p> <p>We understand the difficulty in generating data that can measure progress toward the desired outcomes of Vision 2050. By necessity, many of the criteria used to evaluate progress towards the desired outcomes are very high level, and use proxies. However, we are deeply concerned that some of the criteria used have, at best, a tenuous causal relationship with the desired outcomes. At the same time, criteria that would address some of our own goals and concerns are missing:</p>	<p>The selected criteria provide a summary for the Growth Management Policy Board and public's use. It is not intended to suggest the same weight applies to all criteria. More detailed information is provided in the Draft SEIS.</p>
Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett	8	<p>Development Patterns/Land Use</p> <p>The analysis is based four criteria:</p> <ul style="list-style-type: none"> <li>• Growth in proximity to the urban growth boundary</li> <li>• Growth in proximity to high capacity transit station areas</li> <li>• Developed land (acres)</li> <li>• Land use (Overall judgment from DSEIS land use analysis)</li> </ul> <p>It is difficult for us to understand how the three quantitative criteria can provide a basis for deciding which growth alternative best serves the region's land use goals for the next 30 years. We agree that it is essential to avoid excessive growth to rural and resource lands, and that location-specific, appropriate growth should be focused in proximity to high capacity transit stations. From the ports' perspective, there are other important questions that require answers. We hope that the EIS will include analysis that provides answers to the following questions:</p> <ul style="list-style-type: none"> <li>• To what extent do the alternatives increase pressure on existing, older MICs like the Duwamish MIC, or the Port of Tacoma MIC, which are served by existing and/or future high capacity transit?</li> <li>• Do they support the growth of newer MICs, and those in the making, like Arlington/Marysville?</li> <li>• Do they support not only balanced jobs/housing growth, but also provide the right type of job in the right type of place? (This is also an important question related the alternatives' respective support of the regional economy.)</li> <li>• Reading the DSEIS and its various appendices, it is difficult to discern what the generic land use criterion (based on overall judgment) means, and this criterion is not included in Table ES-3. In the EIS document, please be explicit about the performance indicators you are using for this criterion.</li> </ul>	<p>Comments acknowledged. The growth modeling tools do not have a way to measure "pressure" on surrounding industrial areas. Local land use regulations and industrial zoning can prevent encroachment of incompatible land uses. A mitigation measure was added to address this topic. It is not possible to match locations to each type of job (some are not locationally dependent). However, VISION 2050 encourages a range of housing options in all communities to provide housing choices for the range of jobs that may occur. Policies on jobs and housing support improved jobs/housing balance. See response above on VISION's support for preserving industrial land. A criterion that uses overall judgment takes qualitative impact information into account in addition to the quantitative measures in the category.</p>
Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett	9	<p>Economy</p> <p>As ports we are charged with generating economic and job growth for the counties we serve. We take our responsibility seriously. For this reason, we are particularly disconcerted by the criteria used to determine the impact of each alternative on the economy of our region:</p> <ul style="list-style-type: none"> <li>• Access to jobs by non-SOV mode This criterion illustrates the limitations of the Geographies on which the analysis is based. Not all land uses are equal. Our cargo terminals are by definition land-intensive, making access by transit expensive, if not impossible. This is true for to varying degrees for other industrial manufacturing land uses, including rail yards and warehousing distribution centers. Yet, they, and the often synergistic businesses located in the surrounding MICs, are major economic engines for the region.</li> </ul> <p>We are dismayed that there is not a concurrent criterion reflecting the impact of each alternative on freight access to the MICs and other freight dependent land uses. Delay, the only somewhat freight-related transportation criterion, only partially reflects the economic impact of the proposed alternatives on the economy of the region.</p> <ul style="list-style-type: none"> <li>• Jobs-housing balance/ratio indexed to regional average The current housing crisis in our region clearly illustrates the fact that this criterion fails to address one critical element: There is a growing imbalance in between the type and cost of housing and the types and salaries of jobs that would be created. Seattle and other cities in the region have recognized this fact and instituted minimum wage ordinances. By itself, the housing/jobs ratio is not a good indicator of the health and growth of our economy. Please consider including analysis that can answer this simple question: Are we growing the right jobs in the right places?</li> </ul> <p>The ports have pointed out on many occasions that housing is incompatible with heavy industrial land uses in the MICs, and should be avoided when brownfields are developed. Yet, the one-size-fits-all analysis approach used in the DSEIS does not account for this reality. We would be happy to help you determine whether there is a way to reflect that reality in the EIS evaluation of the alternatives. There is an urgent need to ensure that development in or near the MICs is compatible with heavy industrial uses.</p>	<p>The Draft SEIS analyzes effects of the alternative growth distribution patterns using a set of transportation assumptions based on the Regional Transportation Plan. Analysis of freight access at the level of detail suggested is beyond the scope of the SEIS. Determination of the "right place" for jobs is a policy decision and not an objective criterion. Please see PSRC's Freight Briefing Paper that was created with the purpose of highlighting areas of intersection between freight and land use and offers considerations for freight to incorporate during the local planning process: <a href="https://www.psrc.org/sites/default/files/v2050-freight-paper.pdf">https://www.psrc.org/sites/default/files/v2050-freight-paper.pdf</a></p>

Commenter	Comment Number	Comment Text	Response
		<ul style="list-style-type: none"> <li>• Economy (overall judgment from DSEIS population, employment, and housing analysis) Reading the DSEIS and its various appendices, it is difficult to discern what this criterion is measuring. It is not included in Table ES-3. In the EIS document, please be explicit about the performance indicators you are using for this criterion. An important question that should be answered by the EIS is: How do the alternatives support the industry clusters, including the Maritime Industrial Sector, that are at the core of our Regional Economic Strategy?</li> </ul>	
Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett	10	<p>Transportation</p> <p>The DSEIS includes the following criteria to evaluate the transportation impacts of the alternatives:</p> <ul style="list-style-type: none"> <li>• Vehicle miles travelled (per resident)</li> <li>• Vehicle minutes travelled (per resident)</li> <li>• Delay (average hours per resident)</li> <li>• Transit ridership</li> <li>• Mode share (focused on people)</li> </ul> <p>Here, our earlier statement that, for some criteria, the difference in outcomes across alternatives would appear well below the margin of error, is particularly relevant. Understanding the limitations in the data and modeling tools used for this analysis, should the region base major policy decisions on this information? We would recommend taking a more fine-grained approach, looking at hotspots and major corridors in the system to determine whether adjustments to the proposed jobs and housing locations and densities would make a difference, so that a more nuanced alternative can be developed.</p> <p>There is only one criterion, "Delay", that can be applied to determine the impacts of the alternatives on freight mobility. Yet, freight mobility is critical to the economy of the region, and thus, the ability of local jurisdictions to fund the transportation, energy, and public services and infrastructure, necessary to implement any of the RGS alternatives. This concern is compounded by the fact that there is very little differentiation in the number of hours of delay among the alternatives, rendering an evaluation of the economic impact of delay on truck movement almost moot. An evaluation that is focused on the T-1 and T-2 FGTS system and the monetized truck delay at existing and future freight bottlenecks, could help provide better data on the impact of the alternatives on freight mobility.</p> <p>In recent years, we have watched the exponential growth of both Transportation Network Companies (TNCs) like Uber and Lyft, and e-commerce with great interest. Emerging research indicates that TNC trips replace transit, walking and biking trips, and there is evidence that e-commerce, with short delivery windows, and a multitude of smaller vehicles making deliveries, similarly increases congestion and related air emissions. We would like to know to what extent these trends are included in the analytical work resulting in the data provided in Table ES-3.</p>	See response above on model results. A Technology Briefing Paper and a Freight Briefing Paper prepared for VISION 2050 discuss the changes in transportation technology and package delivery. Policies and actions in the Transportation section of VISION 2050 call for continued work to address technology and freight, such as analysis of the freight network conducted for the Regional Transportation Plan.
Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett	11	<p>Enumeration of Potential Mitigation Measures Throughout Chapter 4</p> <p>Per our cover letter, the needs of ports and MIC's have frequently been overlooked during the crafting of draft Multicounty Planning Policies. The following Chapter 4 policy placeholders raise issues for ports and MIC's.</p> <p>Table 4.1-4. Potential Mitigation Measures: Housing and Employment</p> <ul style="list-style-type: none"> <li>• Rezone for increased density near transit and services, unless located within a MIC</li> </ul> <p>Table 4.2-1. Potential Mitigation Measures: Land Use</p> <ul style="list-style-type: none"> <li>• Work with jurisdictions to properly phase growth concurrent with needed infrastructure</li> <li>• Promote transportation investments that serve increased support increased concentrations of population and employment</li> <li>• Promote higher densities near transit, in zones that allow for housing, and encourage transit-oriented development, recognizing that TOD will look different in a MIC where the focus is employment</li> </ul> <p>Table 4.3-3. Potential Mitigation Measures: Transportation</p> <ul style="list-style-type: none"> <li>• Recognize the last 50 feet in goods delivery, manage the curb</li> <li>• Encourage safe routes to school to include non-motorized routes and program support</li> </ul> <p>Table 4.4-2. Potential Mitigation Measures: Air Quality Topic: Localized Emissions</p> <ul style="list-style-type: none"> <li>• Incorporate trees and vegetation in urban development and retrofit projects</li> <li>• Consider proximity to sensitive populations (children, elderly) in siting development and transportation infrastructure</li> <li>• Identify localized air quality impacts, and prioritize mitigation projects for the most vulnerable populations</li> <li>• Consider policies to prohibit idling</li> </ul> <p>*Suggestion to delete measures listed above from Table 4.4-2. These are already covered by the regional emissions section.</p> <p>Table 4.5-1. Potential Mitigation Measures: Ecosystems</p> <ul style="list-style-type: none"> <li>• Design and construct transportation facilities to maintain species and ecosystem functions, considering hydrological and ecological connectivity</li> <li>• Implement the Regional Open Space Conservation Plan (PSRC 2018j) at the local level. Suggestion to delete measures listed above from Table 4.5-1. This was not presented as a regulatory document, nor as future policy guidance to be included in Vision.</li> <li>• Locate, design, and maintain stormwater management facilities to maximize benefits to pond-breeding amphibians (Wind 2015). Suggestion to delete measure listed above from Table 4.5-1. Stormwater management is already heavily regulated.</li> </ul>	Many of the mitigation measures sections have been updated as suggested. To reinforce important and complex strategies, some complementary overlap exists between sections within VISION 2050 and also between VISION 2050 and regulations.

Commenter	Comment Number	Comment Text	Response
		<p>Table 4.6-2. Potential Mitigation Measures: Water</p> <ul style="list-style-type: none"> <li>• Improve stormwater detention and treatment systems, including “green” stormwater infrastructure</li> <li>• Pursue low-impact development techniques to minimize impervious surface</li> <li>• Implement “best practice” construction practices</li> <li>• Control land use in areas susceptible to groundwater contamination</li> <li>• Limit development of impervious surfaces over recharge areas</li> <li>• Update development standards to minimize impervious surface</li> </ul> <p>* Suggestion to delete measures listed above from Table 4.6-2. Already regulated.</p> <p>Table 4.8-1. Potential Mitigation Measures: Parks and Recreation Resources</p> <ul style="list-style-type: none"> <li>• Include bike lanes, broad sidewalks, and shared-use paths in comprehensive planning for new transportation and recreation development and redevelopment designed to be practical, useful, and safe for all likely users of the transportation system</li> </ul> <p>Table 4.13-1. Potential Mitigation Measures: Earth • Strengthen critical areas ordinances, development codes, and building standards for structures located within hazard areas</p> <p>* Suggestion to delete measure listed above from Table 4.13-1. This has been accomplished.</p>	
<p>Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett</p>	<p>12</p>	<p>Re: SEPA scoping comments for Vision 2050 Plan</p> <p>Dear Chair Mello,</p> <p>Thank you for the opportunity to provide scoping comments on the Vision 2050 Plan development process. This letter and the attached detailed comments represent the collective perspective of the ports of Bremerton, Everett, Seattle and Tacoma along with The Northwest Seaport Alliance. Our programs touch the lives of Puget Sound residents in numerous ways, ranging from economic engines such as the state’s largest cargo terminals to quality of life through our travel and recreation facilities.</p> <p>We appreciate PSRC’s efforts to facilitate a regional conversation about planning. We realize how high the stakes are against a backdrop of headlines about both immense prosperity and a homelessness epidemic. But we know that at the heart of the right land use planning strategy is job creation and we know that Washington is consistently rated as one of the most business-friendly states. Also, globalization is a force that cannot be denied – and Washington is amongst the most trade-dependent states.</p> <p>For this reason we highlight the importance of the region’s industrial lands and the jobs they create. The discussion of industrial lands in the PSRC Centers Framework project attracted a great deal of attention from cities across the region. This is a testament to their status as assets to the regional economy and the need for continued protection. Attachment to April 26, 2019 DSEIS comment letter 2 A second issue we wish to highlight for the Vision 2050 process is the importance of freight mobility. All of the region’s residents have an interest in freight mobility and scoping is the perfect time to make sure we have the right analytical approach to properly forecast and plan for freight mobility.</p> <p>We invite you to review the attached detailed comments and look forward to working with you, the GMPB and additional stakeholders on Vision 2050.</p> <p>Sincerely,  Commissioner Peter Steinbrueck Port of Seattle Commissioner and Northwest Seaport Alliance Managing Member  GMPB Ports Representative</p> <p>Attached: Detailed Comments **  **</p> <p>Scoping For the Vision 2050 Process: Detailed Comments</p> <p>The ports of Bremerton, Everett, Seattle and Tacoma, along with the Northwest Seaport Alliance, are pleased to join together to submit these detailed comments on scoping for the Vision 2050 Plan. Undertaking major infrastructure investments – and understanding how that infrastructure attracts and anchors commerce – is at the heart of our work as port authorities. Our approach to infrastructure is aligned with the Growth Management Act’s goal for efficient utilization of urban infrastructure. We share the following comments:</p> <p>Environment and Sustainability</p> <p>VISION 2040 calls for coordinating environmental planning in the region and using the best information possible at all levels of environmental planning. It recognizes that a healthy environment translates into better human health and improved habitat for wildlife. Specifically, MPP-En-3: Maintain and, where possible, improve air and water quality, soils, and natural systems to ensure the health and well-being of people, animals, and plants. Reduce the impacts of transportation on air and water quality, and climate change. We would support similar goals and policies, consistent with our long term goals, for Vision 2050.</p> <p>Industrial lands and Manufacturing / Industrial Centers</p> <ul style="list-style-type: none"> <li>• As with other forms of employment centers, great care is needed in the designation of Manufacturing / Industrial Centers (MICs). However, the needs of MICs differ from other centers in important ways. Chief amongst these differences are that residential uses are not compatible with MICs and serving a MIC with transit involves challenges not present in other centers.</li> <li>• As Vision 2050 is scoped and analytical work is performed, earlier analyses of industrial lands can be instructive. Just to note a few issues that have arisen in earlier analyses of industrial land:</li> </ul>	<p>The scoping letter was reviewed prior to developing the Draft SEIS.</p>

Commenter	Comment Number	Comment Text	Response
		<p>o Past analyses have relied heavily on coding under the North American Industrial Classification System (NAICS) for all jobs in a given area. The results can be misleading since NAICS is concerned with the economic function of a given firm, not the land use. As an example, a marina is completely compatible with industrial zoning yet its NAICS code falls into a family of NAICS codes that are all recreation and leisure-oriented businesses.</p> <p>o Non-industrial businesses located in an industrial land can skew the picture for the number industrial jobs in that area. This is because uses like railyards, cargo terminals and warehouses have a low density of industrial jobs, yet these uses may be functioning as anchors to the industrial area.</p> <p>o Similarly, the value of cargo terminals and railyards is not captured by analyses that rely on assessed improvement values (building values) as a proxy for economic impact.</p> <ul style="list-style-type: none"> <li>• Industrial areas adjacent to downtowns can face persistent pressure to convert to non-industrial uses. Industrial zoning is not always crafted in a way that prevents new uses from becoming established at a critical mass. This, in turn, fuels speculation of future upzoning of the area. Regional MIC designation can help provide certainty to land owners that the area will remain industrial. Port of Everett's program to record notices on the property titles for neighboring properties is an example of the extreme measures required when sensitive uses are not adequately buffered from industrial uses.</li> <li>• Most industrial areas can trace their history to critical infrastructure such as seaports, airports, or rail lines. As pressures mount to convert industrial areas, planning policies must recognize situations where it is impractical or impossible to relocate the infrastructure. Deep water ports are a prime example of such infrastructure.</li> <li>• The MICs in the region should each be allowed to grow according to their individual merit and their natural advantages. The system of regional designation of MIC's should not pit the MICs against each other.</li> <li>• Also important to our region is understanding and responding to the region's aviation needs. We expect that Vision 2050 planning can make use of findings from PSRC's regional aviation baseline study.</li> </ul> <p>Freight Mobility</p> <ul style="list-style-type: none"> <li>• Economic growth: We appreciate PSRC's Transportation 2040 Update draft's inclusion of our region's economic strategy goal to "compete globally," and the reference to strategies that are designed to support industrial lands, maritime sites, trade and logistics infrastructure, and freight mobility. Ensuring that freight can reach our facilities is critical to our success. For that reason, we would encourage PSRC to use, and further develop existing land use and transportation planning tools to ensure that both PSRC's land use planning and transportation program development protect, preserve and improve existing maritime, rail and truck infrastructure, especially in the region's MICs, and along the corridors that provide access to these areas. Please be sure to include improvements to these models in your scope of work for Vision 2050.</li> </ul> <p>Your own Transportation 2040 update shows the importance of making this effort: Figure 11 , in Appendix J, the Freight element, shows that between 2016 and 2040, truck tonnage is expected to increase by 56%, far outpacing both employment (40%) and population (26%) growth. The federal government is projecting that annual tons per capita will increase by 27 percent from 55 in 2010 to 70 in 2040.<sup>2</sup> Our region would be remiss in not addressing these dramatic increases in the movement of cargo, most of which will occur by truck, so that it does not hamper future economic growth.</p> <p>1 Transportation 2040 Update, Appendix J, p. 1.  2 FHWA, Freight Facts and Figures, 2010.</p> <ul style="list-style-type: none"> <li>• Innovation: Technological innovation in connected and autonomous vehicles, shared mobility solutions, and ITS enhancements have the potential to greatly enhance our region's ability to manage ever increasing demand for scarce transportation infrastructure. This is true for both the movement of people and goods and Vision 2050 must address both. Consider that connected vehicle technology, efforts such as FHWA's Freight Advanced Traveler Information Systems (FRATIS) program, implementation of block-chaining technology in logistics, and extending signal priority to trucks along major freight corridors are viable solutions to improving freight mobility. Implementation of freight supportive technologies like these should be supported by Vision 2050. We would be happy to work with our staff and the relevant advisory committees on these issues.</li> <li>• Regional integrated freight network: PSRC's freight network is currently focused on major freight facilities in region, but unfortunately, it is based on incomplete information. Appendix J of the Transportation 2040 Update draft, provides a good overview of some of the major freight facilities in the region. This includes marine- and airports, all rail facilities (including yards and related lead tracks,) and pipelines in addition to T-1 and T-2 truck corridors. However, not all jurisdictions consistently and thoroughly report data on truck volumes on major truck corridors to WSDOT, so the system is incomplete. Another issue of concern is that there is comparatively little coordinated effort to ensure that jurisdictions along truck freight corridors maintain system continuity. We hope PSRC can address these issues as part of Transportation 2050. The system map also does not yet include designated over-legal routes, or heavy haul routes important to the ports, and the regional economy. A more robust regional freight network must be supported by a grant funding distribution scheme that maintains and improves the functionality of the existing system while providing investment in strategic system expansion.</li> <li>• Data and analytics: Appendix J of the Transportation 2040 Update draft, while providing a wealth of data from federal and state sources, clearly shows that PSRC is currently lacking detailed data, modeling, and analysis tools to determine local and regional freight activity, performance, and needs. We strongly encourage PSRC to scope, and budget for, a more robust freight data collection and analysis approach that provides quantitative information on the corridors critical to freight as part of Vision 2050. This effort should support the development of a more robust freight plan, similar to the approach taken by the Southern California Association of Governments (SCAG,) in Transportation 2050.</li> </ul>	

Commenter	Comment Number	Comment Text	Response
Puget Sound Clean Air Agency	1	<p>RE: VISION 2050 SEIS Comment</p> <p>Dear Executive Board members and Executive Director Brown: Thank you for the opportunity to comment regarding the VISION 2050 Growth Strategy Draft Supplemental Impact Statement.</p> <p>We appreciate that the Puget Sound Clean Air Agency's climate target is included in the report: 50% reduction in greenhouse gas (GHG) emissions by 2030, and 80% by 2050 (both from 1990 levels). We look forward to working with PSRC to reduce GHG emissions in the transportation sector. Specifically, we look forward to achieving emissions reductions that are 'above and beyond' those laid out in the T2040 4-part strategy. Now more than ever, with potential rollbacks at the federal level, it's essential that we make progress on GHG emissions reductions at a local level.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. Climate change is now a stand-alone chapter in VISION 2050 and new provisions have been added.
Puget Sound Clean Air Agency	2	<p>We will continue to share data and collaborate with PSRC to ensure agencies understand similarities and differences between various emissions reductions goals. PSRC served as a key technical reviewer as we prepared our 'candidate action report' that laid out potential strategies to reduce transportation GHG emissions in the Puget Sound region. These potential strategies are best summarized in our 'wedge' chart that shows how each individual strategy contributes to the ultimate goal, in terms of tons carbon dioxide equivalent emissions reductions over time. We urge PSRC to create similar 'wedge' charts, and are happy to support them in doing so. These charts can help to provide policymakers context to effectively compare and contrast the impact of projects and programs to achieve overall GHG emissions reductions goals.</p>	PSRC appreciates the Puget Sound Clean Air Agency's support and collaboration. PSRC plans to do a wedge analysis to monitor and evaluate progress on climate goals.
Snohomish County Tomorrow	1	<p>Dear Ms. Harris,</p> <p>Snohomish County Tomorrow (SCT) appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050. These comments build on SCT's recommended approach to the VISION 2040 update, as outlined in a letter to PSRC on December 17, 2017.</p> <p>Many of the suggestions and new concepts that were provided in our letter have been incorporated into the VISION 2050 project. SCT appreciates the extent to which these suggested changes and improvements to the regional plan have been accepted by PSRC into the approach to VISION 2050. SCT also wishes to thank PSRC staff for the extra support they provided to the SCT committees during the DSEIS review process, including a description of the impacts of the three DSEIS alternatives specific just to Snohomish County. This additional material has helped us provide to you our comments on the DSEIS and recommendation for a preferred alternative.</p> <p>SCT recommends the transit focused growth alternative as the preferred alternative, with some minor adjustments to the population distribution, as described below.</p> <p>Preferred Alternative – Transit Focused Growth</p> <p>The December 2017 SCT letter recommended that PSRC use a new approach to develop the Regional Growth Strategy (RGS) growth allocations for VISION 2050 that would focus growth around regional and local growth centers and along major transportation and freight corridors, instead of assigning growth distributions to various categories of jurisdictions based on municipal size and type. The VISION update was also encouraged to recognize that Sound Transit and Community Transit have made significant planning progress for the light rail and BRT systems in Snohomish County and that VISION 2050 should recognize and support the integrated planning that is occurring. These planned investments suggested that additional growth and density can be supported in Snohomish County's southwest urban growth area, including unincorporated and incorporated areas near high capacity transit stations beyond jurisdictions that are currently categorized as Metropolitan and Core cities.</p> <p>The alternative which most closely matches the SCT recommendation for a revised approach to the RGS growth distributions is the transit focused growth alternative. This alternative assumes a compact growth pattern with accelerated growth near existing and planned high capacity transit investments, including light-rail, bus rapid transit, commuter rail, and ferry terminals. This alternative would result in the largest shares of growth to Metropolitan Cities (Everett), Core Cities (Bothell and Lynnwood), and High-Capacity Transit (HCT) Communities.<sup>1</sup></p> <p>Outside Metro and Core cities, the transit focused growth alternative places the greatest shares of future growth in the HCT Communities in Snohomish County along high-capacity transit corridors where major investments are being made to create more efficient and frequent options for transit connections and mobility throughout the region. Growth to other cities and towns would be distributed under this alternative based on the broad objectives for the Regional Growth Strategy. Growth in rural areas and unincorporated areas without access to high-capacity transit and unaffiliated unincorporated areas is the lowest in this alternative, even with the recommended adjustments described below.</p> <p><sup>1</sup> HCT Communities include cities (other than Metropolitan and Core cities) and unincorporated urban areas (planned for annexation or incorporation) with existing or planned high-capacity transit service. They include the cities of Arlington, Edmonds, Marysville, Mill Creek, Mountlake Terrace, and Mukilteo; and the following unincorporated portions of the southwest UGA: Bothell MUGA, Edmonds MUGA, Everett MUGA, Larch Way Overlap, Lynnwood MUGA, Mill Creek MUGA, and Mukilteo MUGA. This proposed new regional geography directly responds to the December 2017 SCT suggestion that additional growth and density can be supported in Snohomish County's southwest urban growth area, including unincorporated and incorporated areas beyond jurisdictions that are currently categorized as Metropolitan and Core cities.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. Snohomish County Tomorrow's preference for the Transit Focused Growth alternative has been acknowledged.
Snohomish County Tomorrow	2	<p>Minor adjustment for population recommended to the Transit Focused Growth alternative</p> <p>SCT's recommended population allocations to outlying unincorporated areas would be slightly increased as a result of shifting 4% of the county's population growth from HCT Communities to the Unincorporated Urban and Rural area geographies to help make these distributions more achievable:</p> <p>Under the transit focused growth alternative, only 2% (10,000) of the county's 2017-2050 population growth is assigned to rural areas, down sharply from 10% in VISION 2040 and 8% in our current CPPs. The transit focused growth alternative's assignment of only 10,000 population growth to rural areas over the next 35 years amounts to about what Snohomish County currently typically experiences during a single decade. To limit rural growth to just 2% would be a challenge not just from a zoning perspective, but also from the perspective of limiting the ability of property owners to develop on existing (pre-GMA) substandard vacant lots<sup>2</sup>. The suggested recommendation would be to allocate a potentially more achievable growth share reduction in rural areas of 6% (25,000 new residents over 35 years), which is about 4 percentage points less than our current rural growth trends indicate and the lowest share of county population growth going to rural areas compared with the other two alternatives studied. SCT does not support changes to rural zoning and regulations that would reduce the number of lots already legally created in the rural areas. Similarly, the Unincorporated Urban geography has a challenge of limiting population growth over the next 35 years to just 3% (12,000 new residents), given that some of these areas</p>	These allocation recommendations were considered in the development of the Regional Growth Strategy.

Commenter	Comment Number	Comment Text	Response
		<p>represent sizeable development potential with existing or planned high capacity transit service (Cathcart, Lake Stickney gap area). The suggested adjustment would be to make the allocation more realistic by increasing the population growth assignment to 18,000 (4%) for these areas.</p> <p>Even following the shift of 4% of the county's population growth from HCT Communities to the Unincorporated Urban and Rural area geographies, half of Snohomish County's 2017-2050 population growth would be assigned to the HCT Communities geography – the largest share of county population growth projected for any of the regional geographies.</p> <p>We anticipate that a characterization of the impacts associated with these minor adjustments to the transit focused growth alternative in Snohomish County would be in the range of impacts analyzed in the DSEIS but request that the analysis confirm this assumption during preparation of the Final SEIS.</p> <p>Favorable results from the analysis of impacts of the alternatives</p> <p>The analysis of the regional impacts for the three alternatives studied in the DSEIS show that the transit focused growth alternative showed the greatest reduction in impacts across a range of environmental indicators that were studied, compared with the "No Action, Stay the Course" alternative. This observation was also made when the impacts of the alternatives were studied specific to Snohomish County.</p> <p>Other RGS and VISION-related considerations are discussed below.</p> <p>2 To get a general sense of the number of parcels that could potentially meet this definition, a GIS query was run of Assessor parcels outside the UGA in Snohomish County, excluding those recorded since 1995, that were less than 200,000 square feet and greater than 20,000 square feet in size, and were classified as vacant. This resulted in a count of 3,331 parcels. At 2.7 persons per unit, this source of potential capacity alone could account for a future 9,000 population increase outside the UGA.</p>	
Snohomish County Tomorrow	3	<p>Jobs/Housing Balance</p> <p>For the VISION 2050 transit focused growth alternative, a policy decision to shift 5% of the region's employment growth from King County to the outlying counties was made, resulting in Snohomish County receiving 2% more of the region's employment growth to 2050 compared with the no action alternative. This resulted in an improved jobs/housing balance at the county level with the transit focused growth alternative compared with the no action alternative, however the increase was marginal. PSRC should consider evaluating further decentralized employment growth in the region, especially anticipating a time when the region's high capacity transit system is more extensive and more fully built out.</p> <p>In Snohomish County, an upward adjustment to future employment growth may be justified by recent events not studied in the DSEIS that would potentially facilitate greater interest in employers choosing sites in the Paine Field area (in response to the recent arrival of commercial airline service) and Arlington-Marysville area (in response to an anticipated designation of this area by PSRC as a regional Manufacturing/Industrial Center).</p> <p>SCT requests that VISION 2050 include UGA boundary flexibility to allow for changing population distribution, taking into consideration logical service and natural boundaries.</p>	Comment acknowledged. The Growth Management Policy Board considered options for further addressing jobs/housing balance. Changes to UGA boundaries are regulated by the Growth Management Act and countywide planning policies.
Snohomish County Tomorrow	4	<p>Timing of Growth</p> <p>An understanding of the timing of when the transit focused growth distributions could be expected to be realized over time is not apparent in the DSEIS analysis. The transit focused growth alternative may be the preferred choice, but some consideration may need to be made to the fact that there is still some time before significant segments of the regional transit investments are complete. The VISION update should evaluate a timing component to the regional growth strategy that includes interim-year growth assignments so that a rationale for eventual realization of the 2050 growth assignments can be articulated and understood. Local jurisdictions would be able to use this information to not only plan for where the growth is likely to occur, but also when it would likely occur based on transit construction and corresponding market adjustments. This should also include an assumption regarding potential post-2036 high capacity investment and implementation decisions (e.g., Sound Transit 4) that the region may make well before the end of the 2050 plan horizon.</p>	Timing of transportation improvements was included in the analysis and assumed based on the adopted Regional Transportation Plan and long range transit plans. Guidance provided in VISION 2050 for setting targets acknowledges how growth may vary depending on the timing of transportation projects.
Snohomish County Tomorrow	5	<p>Flexibility for Subsequent Countywide Target Setting Process</p> <p>As stated in our December 2017 letter, SCT believes that the growth figures provided in the RGS should recognize economic fundamentals and realistic timelines for realization of these shifts in future growth distributions. This recognition is warranted given the uncertainties in timing of the necessary urban infrastructure investments and anticipated market responses. As such, the RGS growth allocations should be provided by PSRC as guidance to the subsequent Countywide Planning Policy/Local target setting process. The region needs to be able to adapt and adjust when unforeseen shifts in the regional economy occur or growth opportunities in local urban centers in cities and towns change the fundamental assumptions used to establish the growth assignments.</p> <p>This recommendation extends to the idea that the transit focused growth alternative's goal of directing 75% of the region's population and employment growth to areas in close proximity to the existing and planned high capacity transit station area locations was intended to be a modeling goal rather than an exact policy goal. This modeling goal should result in a population and employment growth distribution by regional geography that will be the basis for disaggregating to individual jurisdictions within each regional geography through the countywide planning process, and there should not be an expectation that each Metro and Core cities, and HCT Communities' local plans will demonstrate accommodation of 75% of its assigned growth within the specific vicinity of the station areas. Instead, each jurisdiction has flexibility in designing a land use element that adequately responds to the RGS regional geography- based distribution and other policy directions provided by the MPPs and CPPs.</p> <p>VISION 2050 should also recognize that market factors and consumer choice are primary drivers of population distribution. While SCT's recommended VISION 2050 regional growth strategy relies on a transit focused growth alternative, local flexibility and authority must be maintained in order to respond to and anticipate actual growth patterns.</p>	Target setting at the countywide level will provide flexibility and the opportunity to consider the unique circumstances of each jurisdiction, including light rail service. Based on feedback on the Draft SEIS alternatives, for the Preferred Growth Alternative, the regionwide goal for population growth in regional growth centers and areas within walking distance of high-capacity transit was set at 65%. This is a regionwide goal rather than a goal for each city with high-capacity transit.

Commenter	Comment Number	Comment Text	Response
Snohomish County Tomorrow	6	<p>Moderate density housing</p> <p>According to the DSEIS, all three alternatives result in a lower share of moderate density housing in the future than today. However, moderate density housing is important as a source of more affordable market-rate housing and for accommodating growth within UGAs. A preferred growth alternative focused around high-capacity transit should still allow jurisdictions to encourage more moderate density housing production in the future, compared to what was modeled in the DSEIS.</p>	Increasing the proportion of moderate-density housing is an important strategy. PSRC's model for developing allocations by alternative uses the zoning currently in place, however jurisdictions can increase middle density housing by allowing more of it in their zoning codes.
Snohomish County Tomorrow	7	<p>Transportation</p> <p>Snohomish County, the cities within it, and the region as a whole have invested significantly in transit and facilities that support transit. The adopted RGS should facilitate development that encourages a growth pattern that leverages these investments, especially around access to the locations where billions of dollars are being invested in the high-capacity transit system (ST 2, ST 3, and Bus Rapid Transit locations).</p> <p>VISION 2050 should continue VISION 2040's previous efforts to coordinate land use and transportation planning, including improving access to transit stations, and studying and planning for freight mobility (critical to the County's and region's economy), additional infrastructure, and partnerships that will be needed to realize this vision, such as increased coordination with WSDOT. PSRC should work closely with and encourage WSDOT's Office of Urban Mobility and Access to plan and clearly show how the state transportation system will serve in a comprehensive way with the region's high capacity transit system to support the projected growth. VISION 2050 should set the stage for this work so that it can be further developed in Transportation 2050.</p>	Comments acknowledged.
Snohomish County Tomorrow	8	<p>Tribal Growth</p> <p>The proposed Regional Geographies map shown in the DSEIS for VISION 2050 shows Tribal Lands separate from Rural Areas. For Snohomish County, the Tulalip Reservation is shown (suggesting that the legend may need to be updated to reference Reservation/Tribal Lands). This is a change from the Regional Geography map used in VISION 2040 in which the Tulalip Reservation was shown as part of the Rural Area. With this map change for VISION 2050, it appears that the Rural growth assignment would exclude the Tulalip Reservation. Accordingly, our interpretation of this mapping change is that population and employment growth that may occur on Reservation Lands are not guided by the RGS allocations since these areas are sovereign nations not subject to GMA and VISION 2050 planning requirements. This understanding that Tribal growth that may occur is not counted as part of a county's rural growth, however, is not explicitly acknowledged in the DSEIS, but should be acknowledged in the Final SEIS and in VISION 2050. If not counted as part of the county's rural growth assignment, is growth on Reservation Lands also not part of the countywide growth assignment under the RGS? And if not, what are the implications of this on our ability to plan comprehensively for the county's transportation system needs?</p> <p>There are other Reservation Lands in Snohomish County that do not appear to be mapped in the proposed Regional Geographies map (e.g., Stillaguamish Tribe). However, these additional Reservation Lands should also be recognized in VISION 2050 as not being guided by the RGS allocations.</p>	Growth that may occur on tribal lands in the rural area is included in the rural geography growth allocation. The mapping for VISION 2050 has been updated to make this clearer.
Snohomish County Tomorrow	9	<p>Social equity</p> <p>SCT appreciates the information and evaluation of social equity impacts across the alternatives. PSRC's work in this area has raised awareness locally of the urgent need to address proactively the diversity in the demographics of population growth and particularly the potential displacement of people of color, low income and other at risk populations in areas that are likely to redevelop. As we have seen in other parts of the region, these populations are often disproportionately affected as a result of their proximity to future light rail stations.</p>	Comment acknowledged.
Snohomish County Tomorrow	10	<p>In closing, it is worth noting that favorable feedback has been received on the transit focused growth alternative during other recent interjurisdictional forums. The Snohomish County VISION 2050 Growth Summit 2, held on March 21, 2019, had over 100 attendees representing elected officials and staff from our cities and the County, water and wastewater providers, higher education, Community Transit, Sound Transit, PSRC, WSDOT, Tulalip Tribes, affordable housing providers, Snohomish County Public Utilities District, and consulting firms. The event was jointly sponsored by the Snohomish County Cities and Snohomish County Tomorrow. The focus of the Summit was to understand and discuss PSRC's three growth alternatives and the potential impacts of each alternative for Snohomish County. Overall, there was general support expressed for a future growth distribution pattern that recognized the importance of our existing and planned transit system for providing improved regional mobility for future households and employers.</p> <p>Please feel free to contact us with any questions.</p> <p>Thank you, again, for the opportunity to comment in advance of determining a preferred alternative for VISION 2050. Sincerely,</p>	The collaboration in Snohomish County is commendable.
Sound Transit	1	<p>Dear Ms. Harris:</p> <p>Thank you for the opportunity to comment on the VISION 2050 Draft Supplemental Environmental Impact Statement (DSEIS). The Puget Sound Regional Council's (PSRC) role in coordinating land use and transportation planning in the region is essential, and this role rests on the multicounty planning policies articulated by the VISION plan. On behalf of Sound Transit, I would like to make a few comments about the VISION 2050 DSEIS:</p> <p>Support for VISION's core premise. Sound Transit strongly supports the central philosophy underpinning VISION 2040 and each of the alternatives considered, namely that regional planning efforts "help preserve resource lands, protect rural lands from urban-type development, and promote infill and redevelopment within urban areas to create more compact, walkable, and transit-friendly communities."</p> <p>DSEIS alternatives. The alternatives identified purport to achieve the core premise identified above though with trade-offs in how growth is distributed. Per the table in the Executive Summary, it appears that the "Transit Focused Growth" alternative creates fewer impacts than the other alternatives and therefore appears more likely to achieve the goals identified in the VISION plan.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS.

Commenter	Comment Number	Comment Text	Response
Sound Transit	2	<p>However, two points seem worth noting:</p> <p>First, it is not clear how the allocation of “75 percent of the region’s population and employment growth to occur within a quarter- to a half-mile from current and planned high-capacity transit station areas” in the “Transit Focused Growth” alternative was determined and then how this growth was allocated. How was this percentage determined and were other allocation proportions considered? And, given the different characteristics of transit service between light rail, bus rapid transit, commuter rail, ferries, and streetcar, was any consideration given to the context of the type of existing or planned high capacity transit when allocating this growth?</p> <p>Second, the decision to utilize different growth allocations (one for “Stay the Course” alternative and another for the “Transit Focused Growth” and “Reset Urban Growth” alternatives) is confusing and not well-explained in the DSEIS, particularly in Chapter 3. Given the seemingly significant differences in population growth by county between “Stay the Course” and the “Action Alternatives” (e.g. Table 3.1-4 on page 84), additional clarity is warranted.</p>	<p>Based on feedback on the Draft SEIS alternatives, for the Preferred Growth Alternative, the regionwide goal for population growth in regional growth centers and areas within walking distance of high-capacity transit was set at 65%. This is a regionwide goal rather than an allocation specific to cities. For light rail and streetcar stations, commuter rail stations, and ferry terminals, walking distance is considered a half mile from existing and planned stations. For bus rapid transit, walking distance is considered within a quarter mile of existing and planned bus rapid transit stations. Each alternative plans for the same amount of regional population and employment growth from 2017 to 2050 (about 1.8 million for population and 1.2 million for employment). However, each alternative allocates that growth differently among regional geographies. To encourage a closer jobs-housing balance, Stay the Course includes policy direction to increase employment distribution to Kitsap, Pierce, and Snohomish counties and increase population distribution to Kitsap and King counties (compared to the 2000 base year). The Transit Focused Growth and Reset Urban Growth Alternatives include policy direction to increase employment distribution to Kitsap, Pierce, and Snohomish counties.</p>
Sound Transit	3	<p>*Transit-oriented communities, development, and housing. **The development of VISION 2050 is happening in a period of regional population and employment growth with little precedent and, as such, a focus of the DSEIS is on how to accommodate this growth in a way that achieves desired regional goals and outcomes. In 2018, the Sound Transit Board of Directors adopted an Equitable Transit Oriented Development policy. This policy is supportive of regional growth plans, policies, and strategies (including VISION 2040 and the Growing Transit Communities Strategy), and makes equitable transit oriented development an integral component of high capacity transit project planning and delivery. As VISION 2050 is further refined and eventually adopted, Sound Transit will continue to work with all our partners and stakeholders to achieve this fundamental component of the plan’s success.</p>	<p>Comment acknowledged.</p>
Sound Transit	4	<p>Transportation and transit. Reiterating a comment from Sound Transit’s letter on the VISION 2050 SEPA Scoping Notice from March 2018, we continue to encourage PSRC to document regional transportation issues that arise and communicate how they are incorporated into VISION 2050 and/or are considered in the subsequent update of the Regional Transportation Plan. A decision to focus growth in centers and near high capacity transit may significantly increase demand for the service that Sound Transit and our partner transit agencies provide. We appreciate that PSRC will extend the Regional Transportation Plan’s horizon year “in a separate planning process,” but we would request that VISION 2050 clearly articulate the priorities for that process to consider to ensure a commitment to integrated land use and transportation planning.</p>	<p>Comments acknowledged.</p>
Sound Transit	5	<p>Social equity considerations. Sound Transit appreciates PSRC’s emphasizing the potential effects and impacts to communities of color and low-income communities from the alternatives considered. As a preferred alternative is developed, we encourage PSRC to identify necessary mitigations as well as policy responses from land use and transportation authorities to achieve the desired equity outcome that “all people can attain the resources and opportunities to improve their quality of life and enable them to reach their full potential.”</p>	<p>Policies and actions to address equity have been added throughout VISION 2050. In particular, see the Regional Collaboration, Development Patterns, Housing, and Economy sections.</p>
Sound Transit	6	<p>I want to commend PSRC staff for the clarity of information presentation, especially in the Executive Summary’s comparisons of the different alternatives’ impacts. Sound Transit looks forward to continuing our active participation and contributions to the VISION 2050 process. Please let me know if you have any questions about our comments to the VISION 2050 DSEIS or if you would like to discuss further how PSRC and Sound Transit can collaborate on the development of VISION 2050.</p> <p>Sincerely,  Matt Shelden, AICP  Deputy Executive Director, Office of Planning &amp; Innovation</p>	<p>Comment acknowledged.</p>
Washington State Department of Ecology	1	<p>Re: Vision 2050 Draft Supplemental Environmental Impact Statement (SEIS) Ecology SEPA #201901078</p> <p>Dear Erika Harris:</p> <p>Thank you for the opportunity to provide comments on the Vision 2050 Draft SEIS. The three alternatives analyzed in the Draft SEIS provide a good range of options for how to accommodate future growth in the region. We support development alternatives that minimize development on ecologically important lands, minimize new impervious surfaces in the region’s watersheds, and minimize emissions of greenhouse gases that lead to climate change. The Department of Ecology (Ecology) has the following comments:</p>	<p>Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS.</p>

Commenter	Comment Number	Comment Text	Response
Washington State Department of Ecology	2	<p>AIR QUALITY PROGRAM</p> <p>Jean-Paul Huys, (360) 407-6827, <a href="mailto:jean-paul.huys@ecy.wa.gov">jean-paul.huys@ecy.wa.gov</a></p> <p>Page 39: Nitrogen Oxide (NOx) is listed as a National Ambient Air Quality Standard (NAAQS) on the Draft Supplemental Environmental Impact Statement document. NOx is not a NAAQS. Nitrogen Dioxide (NO2) is the correct term.</p> <p>Page 3: We recommend that you make the distinction between the WA Clean Air Act and the federal Clean Air Act. The federal Clean Air Act requires attainment and maintenance plans.</p> <p>Page 39: We recommend that you define U.S. EPA in the acronyms section (p A-1).</p> <p>P. A-1 of Appendix A: We recommend that you add the definition of Nitrogen Dioxide (NO2).</p>	The SEIS has been updated as suggested.
Washington State Department of Ecology	3	<p>AIR QUALITY PROGRAM – CLIMATE CHANGE POLICY UNIT Gail Sandlin, (360) 407-6860, <a href="mailto:gail.sandlin@ecy.wa.gov">gail.sandlin@ecy.wa.gov</a></p> <p>Table ES-3 provides a comparison of 2050 growth alternatives, including an assessment of greenhouse gas emissions (tons per day CO2e). Both the "Transit Focused Growth" and "Reset Urban Growth" alternatives were compared to "Stay the Course" greenhouse gas emissions. This is informative; however, how do these increases or decreases compare to regional greenhouse gas reduction goals provided in section 2.6.2.? Both King County and Puget Sound Clean Air Authority adopted aggressive greenhouse gas emissions reductions for 2050, specifically 80% below baseline. It is difficult for the reader to understand how these goals are addressed by the Vision 2050 alternatives. A search of the Appendices does not provide clarification instead on page E-1, one is directed to a background paper for information on greenhouse gas sources and state / regional actions. This background paper does provide the King County ghg emissions baseline as 2007 and also includes reduction goals for the City of Tacoma and Snohomish County. Again more clarity in assisting the reader understand the alternatives with respect to achieving greenhouse gas reduction goals would be helpful.</p> <p>Another comment is specific to forest carbon sequestration. Section 2.10.6 states "Forests in the region store 628 million equivalent tons of CO2; loss of these lands would result in much of this carbon entering the atmosphere (PSRC 2018j)." The reference provided is the "Regional Open Space Conservation Plan, June 2018" which repeats the same sentence on page 15 with another reference, specifically to the calculation tool, i-Tree. Thus the reader is not provided a simple path as to how this forest carbon sequestration total was generated nor provided any of the assumptions stating that "loss of these lands would result in much of this carbon released to the atmosphere." For reference, see RCW 70.235.020(3).</p> <p>Is this section of the PSRC Vision 2050 assuming potential loss of region's silviculture sequestration capacity triggering the consideration of carbon dioxide emissions from biomass energy, that is, if the extracted urban canopy was used for such a purpose? Again more clarification in this section would be helpful to the reader.</p>	The VISION 2050 SEIS analyzes the impacts of various growth alternatives, assuming the adopted transportation network to 2040. CO2 emissions are represented in terms of on-road vehicle emissions only, whereas the various goals and targets represent the entire economy. VISION 2050 calls for PSRC to conduct a climate wedge analysis which will provide a more comprehensive comparison for all sectors. The reference related to carbon sequestration has been updated.
Washington State Department of Ecology	4	<p>TOXICS CLEANUP PROGRAM</p> <p>Eva Barber, (360) 407-4094, <a href="mailto:eva.barber@ecy.wa.gov">eva.barber@ecy.wa.gov</a></p> <p>Portions of this SEPA proposal are located in an area that may have been contaminated with heavy metals due to the air emissions originating from the old Asarco smelter in north Tacoma (<a href="https://apps.ecology.wa.gov/dirtalert/">https://apps.ecology.wa.gov/dirtalert/</a>). It should be noted that the contamination associated with the former Asarco smelter also occurs in rural and undeveloped areas.</p> <p>The link below provides a fact sheet that explains more how the arsenic and lead clean-up levels were set and why Ecology sees that they are protective for human health: <a href="https://fortress.wa.gov/ecy/publications/SummaryPages/1109095.html">https://fortress.wa.gov/ecy/publications/SummaryPages/1109095.html</a></p> <p>For assistance and information about Tacoma Smelter Plume and soils contamination, contact Eva Barber with the Toxic Cleanup Program.</p>	The Environmental Health section has been updated with information about Asarco pollution.
Washington State Department of Ecology	5	<p>WATER RESOURCES PROGRAM</p> <p>Stacy Vynne McKinstry, (425) 649-7114, <a href="mailto:stacy.vynnemckinstry@ecy.wa.gov">stacy.vynnemckinstry@ecy.wa.gov</a></p> <p>Page 26: Figure 2.4-3 shows parcel sizes in the region's rural areas. The distribution of parcel sizes is similar to that in the VISION 2040 FEIS, showing that parcels smaller than five acres are the dominant size and are located throughout the land designated as rural. Of the rural parcels that are less than 5 acres in size, about 60,000 are vacant, indicating the potential for substantial future rural development.</p> <p>My understanding is that there are many caveats to the vacancy numbers and in reality, many of these parcels could never be developed.</p> <p>Under the streamflow restoration planning process, Ecology is working with planning groups to project (under current policy) rural growth and associated new water use. Based on historic patterns of rural growth within the counties, we anticipate growth in the rural areas over the next 20 years (and even at full build out) to be substantially less than what this statement implies.</p> <p>Page 52: Washington State has developed a new streamflow restoration law (RCW 90.94) in response to the "Hirst decision." Hirst was a 2016 Washington State Supreme Court decision that changed the way counties approve or deny building permits that use permit-exempt wells for a water source (Ecology 2018). The new streamflow restoration law requires watershed planning and establishes interim standards for new domestic water use and fees for building a permit exempt well. The law affects a majority of the watersheds in the region and planning is underway in applicable watersheds in coordination with Ecology.</p> <p>The fee is a building permit fee (so for instance, if someone is replacing a permit exempt well but is not applying for a building permit, they would not be charged a fee). Recognize that each of the counties covered by the PSRC are impacted and county staff are involved.</p> <p>There are 7 planning processes that impact these counties (WRIAs 7, 8, 9, 10, 12, 13, 15).</p> <p>One is completed (Nisqually) and a plan was adopted by Ecology by the statutory deadline of Feb 1, 2019. Six planning processes are underway and scheduled for completion under the statutory deadline of June 2021. Given the timing of the release of vision 2050, it would be helpful to put in dates associated with the plan</p>	Information on rural development and the Streamflow Restoration law has been updated in the SEIS.

Commenter	Comment Number	Comment Text	Response
		<p>development. They may also want to link to our streamflow webpage for updates on the planning process. - <a href="https://ecology.wa.gov/Water-Shorelines/Water-supply/Streamflow-restoration">https://ecology.wa.gov/Water-Shorelines/Water-supply/Streamflow-restoration</a>.</p> <p>The planning process will lead to projects that offset new permit exempt wells. It is such a narrow focus that it might be helpful to state this instead of leaving open to interpretation what "watershed planning" includes.</p>	
Washington State Department of Ecology	6	<p>SHORELANDS AND ENVIRONMENTAL ASSISTANCE PROGRAM Maria Sandercock, (425) 649-7106, <a href="mailto:maria.sandercock@ecy.wa.gov">maria.sandercock@ecy.wa.gov</a></p> <p>Comments on Affected Environment</p> <p>Parks and Recreation: Since the 2040 FEIS, King County has begun operating the Trailhead Direct Shuttle, which provides access to hiking areas from some urban areas during summer. This may be worth including in the discussion in the "Access to Wild Open Spaces" section.</p> <p>Parks and Recreation:</p> <p>The Draft SEIS identifies the potential for degradation of natural areas from increased use of open spaces as population increases and access to open space increases. We recommend that mitigation measures for this potential impact be identified. This could include working with local recreational organizations to enhance education, trail signage, and other programming with an aim towards better recreational stewardship.</p>	The SEIS has been updated as suggested.
Washington State Department of Ecology	7	<p>Comments on Environmental Effects and Mitigation</p> <p>Land use mitigation measures:</p> <p>Urban lands. In all alternatives, increased development in urban areas may impact ecological resources. Retaining these areas is important for ecological function and also maintaining quality of life for residents, who receive numerous benefits from nearby open spaces. Some additional mitigation measures to consider include: Identify remaining ecological areas/corridors within urban areas that need protection; and develop urban forestry programs.</p> <p>Rural lands: As identified in Chapter 2.4, there is capacity for development in rural areas with 60,000 vacant parcels smaller than 5 acres. We recommend identifying potential mitigation measures for this, or alternatively identifying the need for strategies/tools for counties to minimize development that is out-of-character with rural areas.</p>	The SEIS has been updated as suggested.
Washington State Department of Ecology	8	<p>Ecosystems:</p> <p>Impacts by geography:</p> <p>HCT Communities: The Draft SEIS states that "Growth would likely occur by increasing density around high-capacity transit investments in urban areas that are close to existing city centers. These areas likely have less-intact ecosystems, similar to Metropolitan and Core Cities. Development in these areas could result in low to moderate impacts to ecosystems" (Page 129). We recommend identifying any remaining ecologically important areas in the areas around future transit stations so that future station-area planning can consider these areas and protect them where possible. Further, retaining some open space in these areas can help attract future residents to an otherwise dense urban area and improve quality of life.</p> <p>Cities and Towns: The Draft SEIS states that "Development in these areas could cause a proportionally larger alteration in land cover and vegetation than in more densely developed areas. Compared to the denser urban areas, added infrastructure could pose a greater risk of bisecting currently intact functioning ecosystems and habitats" (Page 129). To mitigate for this potential, we recommend that Cities and Towns identify ecologically important areas (using both the Regional Open Space Conservation Plan and also local information) and incorporate this information into their planning decisions.</p> <p>General mitigation measures suggestions: Identify and map habitat corridors and intact remaining habitat areas at the local jurisdiction level using the Regional Open Space Conservation Plan as a starting point.</p> <p>Parks and Recreation:</p> <p>The Draft SEIS identifies the potential for degradation of natural areas from increased use of open spaces as population increases and access to open space increases. We recommend that mitigation measures for this potential impact be identified. This could include working with local recreational organizations to enhance education, trail signage, and other programming with an aim towards better recreational stewardship.</p>	Additional mitigation measures have been added as suggested.
Washington State Department of Ecology	9	<p>WATER QUALITY PROGRAM</p> <p>Karen Dinicola, (360) 407-6550, <a href="mailto:karen.dinicola@ecy.wa.gov">karen.dinicola@ecy.wa.gov</a></p> <p>Ecology's Water Quality Program issues municipal stormwater National Pollution Discharge Elimination System (NPDES) permits to large (Phase I) and small to medium (Phase II) cities, counties, and non-traditional operators of municipal separate storm sewer systems (MS4s) in Washington State. Vision 2050 clearly sees these Clean Water Act permits as important foundational tools to support protection of aquatic resources under the long-range growth management, environmental, economic, and transportation strategy. Our permits build on the region's current growth management strategy – focusing growth inside UGA boundaries – and we are just beginning to see positive results in improved stormwater management and resulting water quality protection.</p> <p>The "Reset Urban Growth Alternative" is not consistent with our environmental protection goals. Under the NPDES permits and the State's Growth Management Act (GMA), many communities in the PSRC counties are working to accommodate projected growth with minimal increases in impervious cover. Both "Stay the Course (No Action Alternative)" and the "Transit Focused Growth Alternative" support these efforts and are much more supportive of our environmental protection goals – with the "Transit Focused Growth Alternative" supporting the most aggressive approaches.</p> <p>The EIS analysis led to a finding that the "Reset Urban Growth Alternative" would provide greater stormwater benefit from redevelopment retrofits than the "Transit Focused Growth Alternative." We disagree with some of the assumptions made in the analysis and, more importantly, we disagree with the finding. We recognize that the authors had limited data available, and would like to provide more information for context and reinterpretation of the relative benefit comparison.</p>	Thank you for the comment. The SEIS findings are consistent with Ecology's concern regarding increases in new impervious surfaces for the Reset Urban Growth Alternative. The Reset Urban Growth Alternative is identified as having the largest impact from new impervious surface in previously undeveloped areas, and as mentioned, the SEIS states in Section 4.6 that "... in previously undeveloped areas, avoiding development altogether will result in less impact to water quality than new development compliant with current stormwater management codes." In addition, the EIS states that "Where the option is available, focusing growth in previously developed urban areas that redevelops old impervious surfaces and updates controls to current standards will result in less impact to water quality than focusing the same growth in previously undeveloped areas that add new impervious controlled surfaces under current standards." To clarify this potential for adverse impacts, the "Summary of Key Differences" text has been updated. Regarding the comment that additional approaches beyond current NPDES permit

Commenter	Comment Number	Comment Text	Response
		<p>The statement on p. 134 that “in previously undeveloped areas, avoiding development altogether will result in less impact to water quality than new development compliant with current stormwater management codes” applies to redevelopment as well.</p> <p>The sprawl that would be created by the “Reset Urban Growth Alternative” will result in more water quality impacts from clearing and grading than can be mitigated by site and subdivision application of required new development and redevelopment stormwater controls alone, even with all of the permit-mandated Best Management Practices (BMPs). King, Snohomish, and Pierce Counties recently completed watershed-scale stormwater plans that included detailed modeling to evaluate water quality impacts of various buildout scenarios in watersheds under development pressure. They consistently found that additional non-traditional stormwater management approaches beyond current NPDES permit requirements for managing stormwater will be needed to protect water quality in such watersheds. The MS4 permits are on schedule for reissuance on July 1, 2019, and the formal drafts proposed new planning requirements to make progress on this issue. However, the water quality impacts of sprawl would likely be even worse under the “Reset Urban Growth Alternative” in areas of all four counties outside Urban Growth Areas where the Phase II municipal stormwater NPDES permit requirements do not apply.</p> <p>On the other hand, the transition from gray to green infrastructure across the Puget Sound region is just beginning to take off. As retrofits, these projects do not need to be driven by large traditional redevelopment projects to provide multiple stormwater benefits. Cities, Counties, and Conservation Districts are increasing strategic coordination of efforts to transform stormwater infrastructure on both public and private properties in areas of existing development with known water quality issues. They are installing permeable pavement, depaving parking areas, and replacing lawns and curbs with small new green infrastructure approaches that cumulatively improve water quality, provide urban habitat for birds and other wildlife, create aesthetically pleasing park-like spaces, and increase property values while not in themselves displacing residents.</p> <p>Another redevelopment/retrofit project activity that was not included in the analyses was regional treatment facilities in areas with old infrastructure. These facilities are likely to be constructed in the existing urban core, not in rural areas, and provide substantial improvements in water quality. Like the smaller green infrastructure projects listed above, these facilities serve as public amenities. Ecology is supporting design and construction of regional stormwater treatment facilities through our grants program.</p> <p>We appreciate the EIS document’s focus on social justice considerations. Local jurisdictions determine where the types of projects listed above are located, and they will likely appreciate PSRC’s recommendations and future guidance for minimizing displacement effects. However, the smaller projects in particular are increasingly being focused where low-income communities and communities of color reside, and social science studies of these new green infrastructure approaches are showing promise in counteracting common problems these communities face.</p> <p>These multiple benefits have not yet been cumulatively quantified in a way that could inform the EIS analyses, but we are working toward getting this type of information that should be helpful for the Vision 2060 updates.</p> <p>Focusing growth inside the existing designated UGAs has curbed sprawl, protected terrestrial and aquatic habitat, and led to innovation in stormwater management approaches. Looking further ahead to 2070 when as many as 8 million people may live in the region, more aggressive growth management approaches may be needed to keep ahead of those growth pressures. With this in mind, we recommend the PSRC increase engagement with neighboring Puget Sound counties which are also expected to see tremendous population growth during this planning period, and from whom increasing numbers of people are traveling to the PSRC counties for work each day.</p> <p>Thank you for considering these comments from Ecology. If you have any questions or would like to respond to these comments, please contact one of the commenters listed above or Meg Bommarito, Regional Planner, at (425) 649-7128 or by email at <a href="mailto:meg.bommarito@ecy.wa.gov">meg.bommarito@ecy.wa.gov</a>.</p> <p>Sincerely, Tracy Nishikawa SEPA Coordinator</p>	<p>requirements will be needed to protect water quality, the SEIS is consistent with this concern and lists such approaches in Table 4.6-2 as potential mitigation measures.</p>
Washington State Department of Archaeology and Historic Preservation	1	<p>In future correspondence please refer to: Project Tracking Code: 2019-04-02527</p> <p>Re: VISION 2050 Draft SEIS</p> <p>Dear Ms. Harris:</p> <p>The Washington State Department of Archaeology and Historic Preservation (DAHP) has taken the opportunity to review the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050 in regard to impacts upon cultural resources (including archaeological, cultural, and historic resources) affected by adoption of VISION 2050 for growth management in the Central Puget Sound region. In response, we have reviewed the DSEIS and as a result of our review, we are providing the following comments and recommendations for your consideration.</p> <ol style="list-style-type: none"> <li>1. Although included in Table ES-2 on page ES-15, in Table ES-3 Summary of Comparison of Alternative Impacts, we do not see a summary comparison of impacts on archaeological, cultural and historic resources.</li> <li>3. On page 9 in chapter 2, archaeological, cultural, and historic resources are listed as resource types that have had a similar level of impacts since VISION 2040. We agree that all categories of cultural resources have been experiencing basically the same impacts (i.e. development pressures, disinvestment, land conversion, vandalism, natural causes, etc.). However, DAHP contends that over the past decade there has been a significant increase in the trend of heritage resources being lost or adversely impacted.</li> <li>4. In section 2.13, generally speaking, DAHP agrees that “The types of historic, cultural, and archaeological resources and their distribution throughout the region have not changed substantially compared to the resources described in the VISION 2040 FEIS.” In the last sentence in the last paragraph on page 66, it is not clear what is intended when mention is made of “these properties.” We recommend revising this statement to read something like the following: “All types of archaeological, cultural and historic resources (including sites, buildings, structures, districts, objects, and landscapes) are in need of protection.”</li> <li>5. In addition, we recommend including in this section mention of pertinent regulations and sea level rise/climate change. In regard to regulations, it would be useful to mention Section 106 of the National Historic Preservation Act (NHPA) of 1966 that requires federal agency actions to consider the effect of their actions on National Register listed or eligible properties. Unlike the protection requirements of the Endangered Species Act, the Section 106 process only requires consultation to consider project</li> </ol>	<p>Comments noted and several changes have been made to the SEIS as suggested. In addition, please note that relevant regulations have been added to Section 2.17.</p>

Commenter	Comment Number	Comment Text	Response
		<p>affects and mitigation when there are adverse effects on eligible or listed archaeological, cultural, and historic resources. Also important to include in this text is information relating that state legislation (Archaeological Sites and Resources (RCW 27.53)) protects known and discovered archaeological sites from disturbance on all lands.</p> <p>6. In regard to Figure 2.13-1, it is unclear what exactly is being mapped as "Historic Sites." While the source indicates the "National Register of Historic Places", it is not clear what the dots on the map represent. We recommend this be clarified with text in the figure. However, beyond this recommendation is another concern we have about the map, which is that it leaves the impression that these "sites" are thinly scattered across the region (except for a few concentrations in Seattle and Tacoma) and therefore of little consequence to land use decision-makers. In actuality, DAHP's WISAARD database of such resources includes not only National Register listed properties but also those determined National Register eligible plus inventoried properties that are 50 years of age and older. Not disclosable to the general public are thousands of recorded archaeological sites. In essence, a more important message to convey in this section of the document is that cultural resources (known and unknown) are recorded (many of which are designated) in all jurisdictions and potentially found wherever a shovel is put into the ground. Referencing and/or including DAHP's Archaeological Site Predictive Model in WISAARD (<a href="https://fortress.wa.gov/dahp/wisaardp3/">https://fortress.wa.gov/dahp/wisaardp3/</a>) is recommended to include in this section as an important planning tool.</p> <p>7. In regard to section 4.11, Historic, Cultural, and Archaeological Resources, we generally concur with the statements made in the text regarding how these resources will be impacted as a result of the alternatives. Though limited in number and scope, we also note and support the three Potential Mitigation Measures listed on page 152.</p> <p>8. On page 171 in section 5.4.4, a sentence includes "historic housing stock" as one of "several key factors" that drive gentrification and displacement. A concern here is that citing "historic housing (which is unclear as to how that is defined in this context) as a key driver implies a cause and effect relationship that may be based on anecdotes, but not borne out in research. A recommendation would be to remove this sentence.</p>	
Washington State Department of Archaeology and Historic Preservation	2	<p>2. In 1.2.1 under the Growth Management Policy Board's desired outcomes for Vision 2050 (also listed on pages ES-4/5) it is disappointing that preservation of heritage related resources is not included as a desired outcome for the region in 2050. As a note, in DAHP's own current work to update the Washington state historic preservation plan, the agency received hundreds of comments about the importance of preserving heritage resources for quality of life and economic development reasons as well as being of value to pass along to future generations.</p> <p>Beyond the scope of the SEIS, a recommendation for the Puget Sound Regional Council is to build into VISION 2050 a menu of policies and strategies that local jurisdictions should implement that avoid, minimize, or mitigate negative impacts to cultural resources. It should be remembered that Historic Preservation, while a GMA goal, is not required to be addressed much less implemented in comprehensive plans. DAHP staff welcomes the opportunity to work with PSRC on this recommendation.</p>	VISION 2050's Development Patterns section contains policies to preserve significant regional historic, visual, and cultural resources, including public views, landmarks, archaeological sites, historic and cultural landscapes, and areas of special character. To help implement these policies, PSRC could provide a forum for sharing strategies to avoid, minimize, or mitigate negative impacts to cultural resources. Additional discussion with the Department is welcome.
Washington State Department of Archaeology and Historic Preservation	3	<p>Finally, please note that in order to streamline our responses, DAHP requires that all documents related to project reviews be submitted electronically. Correspondence, reports, notices, photos, etc. must now be submitted in PDF or JPG format. For more information about how to submit documents to DAHP please visit: <a href="http://www.dahp.wa.gov/programs/shpo-compliance">http://www.dahp.wa.gov/programs/shpo-compliance</a>. To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed guidelines including requirements for survey reports. You can view or download a copy from our website.</p> <p>Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me at 360-586-3073 or <a href="mailto:greg.griffith@dahp.wa.gov">greg.griffith@dahp.wa.gov</a>.</p> <p>Sincerely, Gregory Griffith Deputy State Historic Preservation Officer</p>	Comments noted.
Washington State Department of Archaeology and Historic Preservation	4	<p>Hi Erika, attached please find a pdf of our comment letter to you about the VISION 2050 DSEIS. Generally speaking, we are urging that cultural resource protection comes to play a larger role in implementing whichever one of the 3 alternatives are selected by the PSRC to adopt. We welcome the opportunity to work with PSRC to achieve that.</p> <p>Feel free to contact me with any questions.</p> <p>Thank you. Greg Griffith Deputy State Historic Preservation Officer</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS.
Washington State Department of Transportation	1	<p>Dear Mr. Brown:</p> <p>We appreciate the opportunity to review the VISION 2050 Draft Supplemental Environmental Impact Statement (SEIS). The draft SEIS reflects significant work to address the last decade of changes in the central Puget Sound. While the region has been a magnet for residential and job growth, this has led to displacement and economic hardship for many of the region's more vulnerable populations. Housing costs have forced residents to live further away from work, which contributes to longer commute times and increased pressure on our transportation system. These changes have influenced housing, commute, and travel patterns. As our agency and others respond to these growing issues, VISION 2050 provides an opportunity to plan in a way that makes the most of the planned and future transportation investments we'll see over the next thirty years. The following comments were developed with this in mind and consideration by PSRC's Growth Management Policy Board.</p> <p>WSDOT's preferred alternative</p> <p>Of the three alternatives, WSDOT sees the Transit-Focused Growth Alternative as the best option to address the many challenges described above. By focusing 75 percent of the region's growth around its existing and long-term transit investments, this alternative provides a foundation to further integrate land use and transportation planning. Transit-Focused Growth better addresses the region's jobs-to-housing imbalance than the other alternatives, and shows the least growth occurring in rural and unincorporated areas where development patterns force reliance on single occupancy vehicles. Not surprisingly, this alternative provides the greatest support for transit oriented development, which results in the highest transit usage, the largest number of jobs accessible by walking, biking, or transit, and shows the least environmental impact.</p>	Thank you for reviewing and providing comments on the VISION 2050 Draft SEIS. WSDOT's preference for the Transit Focused Growth alternative has been acknowledged.

Commenter	Comment Number	Comment Text	Response
Washington State Department of Transportation	2	While the performance outcomes for the Transit-Focused Growth Alternative shows a step in the right direction, it also contributes to the highest potential risk of displacement for people of color and low-income communities. If this alternative is selected, we recommend robust policies and mitigation measures be adopted in VISION 2050 that proactively work to prevent displacement by providing affordable housing and transportation options for the affected communities.	The SEIS identifies additional displacement mitigation measures and VISION 2050 has been updated to include additional consideration of displacement. See VISION 2050's Regional Collaboration, Development Patterns, Housing, and Economy section for policies related to displacement.
Washington State Department of Transportation	3	WSDOT is least supportive of pursuing the Reset the Urban Growth Alternative. The Reset Alternative would result in more pressure (congestion) on our transportation system and environment, while providing the least access to jobs via biking, walking, and transit, including connections to ferry terminals.	Comment acknowledged.
Washington State Department of Transportation	4	<p>Additional considerations</p> <p>The following are areas that could benefit from additional work and/or clarification as the Growth Management Policy Board selects a preferred alternative: Updated Centers Framework and Achieving the Regional Growth Strategy</p> <p>The draft SEIS describes that the objective of the Regional Growth Strategy is to "...create and support centers to serve as concentrations of jobs, services, and other activities." However, the document doesn't indicate how much of the forecasted population growth is expected to occur in the designated centers under any of the alternatives.</p> <p>It is important to distinguish between growth in centers (as opposed to growth in cities with centers) because centers are also intended to serve as transportation hubs whereas most city neighborhoods do not serve that function. PSRC's 2018 Regional Centers Framework update defined two new types of regional growth centers-Urban Growth Centers and Metro Growth Centers. It defines different roles and functions for these two types of centers and sets very different expectations for accommodating future growth for each. It's important to know how much growth will occur in each of these types of centers as opposed to other parts of the region, as it has implications for transportation planning and congestion mitigation.</p> <p>The updated Regional Centers Framework calls for research to be conducted to provide guidelines for the number and distribution of the regional centers, an understanding of the competition for market shares, and projected growth. Having the results of this work seems essential in updating the Regional Growth Strategy. We encourage further analysis to identify the appropriate classification for each of the regional growth centers, and some analysis of the impact these would have on the success of the Transit-Focused Growth Alternative. For example, if all 29 regional growth centers were successful in meeting their new expectations for growth by PSRC, what share remains for the other regional geographies, such as the High Capacity Transit Communities?</p>	VISION 2050's Regional Growth Strategy identifies specific regional goals for growth within designated regional growth centers and other high capacity station areas. Technical assistance and guidance identified in VISION 2050 would support countywide and local efforts related to targets and planning for regional centers. Future support and analysis work by PSRC for regional centers will monitor growth achieved and planned for regional centers.
Washington State Department of Transportation	5	<p>Timing of High-Capacity Transit Investments, Growth, and Development</p> <p>The Transit Focused Growth Alternative calls for 75 percent of the region's population and employment growth to occur within regional growth centers and within a quarter mile to a half-mile from current and planned investments in high-capacity transit. This alternative uses the long-range high capacity transit network identified in the Regional Transportation Plan. Some of this network exists today and some of it is being implemented now, but much of it won't be completed until 2030 and beyond.</p> <p>If new population and employment targets are adopted approximately every ten years, there will be approximately three cycles completed prior to 2050. The draft EIS does not discuss the assumptions for how growth will be distributed over the 30 year horizon to align with the transit investments coming online. For example, does the alternative assume that the High-Capacity Transit Communities (HT) receiving service sooner will grow at a faster rate than other areas in the earlier years of the planning horizon? Concentrating significant growth in the HT Communities decades before the investments are promised could have significant negative impacts on the regional transportation system.</p> <p>The SEIS would be improved with a discussion of the assumption used in the analysis, including any discussion of the ways in which local population and employment target processes will be conducted in the years leading up to the planned transit investments opening for service.</p>	Target setting at the countywide level will provide the opportunity to consider the unique circumstances of each jurisdiction, including high-capacity transit service. Additional context regarding this process has been added to the SEIS. Appendix C discusses the development of control totals for modeling purposes. The integrated models used for this analysis account for evolving accessibility and development potential over time from new or changed transportation options. VISION 2050 addresses the role of growth targets and includes an action for PSRC to provide additional guidance about targets, including the timing of transit investments.
Washington State Department of Transportation	6	<p>Freight and warehousing trends</p> <p>In general, WSDOT would like to see the SEIS further address current and future issues with freight mobility in the region as it relates to the shifting trends of e-commerce. As the population continues to increase, pressure will continue to be placed on the freight and port systems we have. Transportation patterns (including supply chain and personal trips) have already shifted in response to the popularity of e-commerce within the last decade. E-commerce has led to a boom in the warehousing industry and has concentrated heavy truck traffic between warehouses and distribution centers. Simultaneously, this system reduces the amount of personal and truck trips to and from traditional shopping areas, while adding delivery vehicles to local roads. Although the effects of this trend are not fully understood, we suggest considering additional mitigation measures related to commercial truck parking needs and freight movement throughout the region, as they have a significant impact on the transportation system, economy, and environment. Please see the 2016 Truck Parking Study and the 2017 Freight Systems Plan for more information.</p>	A Technology Briefing Paper and a Freight Briefing Paper prepared for VISION 2050 discuss the changes in transportation technology. Actions in the Transportation section of VISION 2050 call for continued work to address technology and freight.
Washington State Department of Transportation	7	<p>Mobility on Demand</p> <p>In the past decade, we've seen more and more people turn to on-demand ridesharing services to replace their own car trips or connect to other modes. Although it may be difficult to forecast future ridership for these types of services, we understand there are still impacts to our transportation system. For example, if someone uses a rideshare service to reach a ferry terminal, there may be one less vehicle on board, but that trip can contribute to more congestion in the local street network and continued need for drop-off/pick-up zones.</p> <p>In the future, we would like to work with PSRC and other partners to more accurately analyze the impacts of these on-demand services on our transportation system and determine policies that guide an equitable and integrated transportation network for all.</p>	A Technology Briefing Paper and a Freight Briefing Paper prepared for VISION 2050 discuss the changes in transportation technology. Actions in the Transportation section of VISION 2050 call for continued work to address technology and freight.

Committer	Comment Number	Comment Text	Response
Washington State Department of Transportation	8	<p>Technical comments</p> <p>For your consideration, we have included a table with technical comments and the corresponding page numbers.</p> <p>We appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement for VISION 2050 and look forward to continuing our conversations about building a safe, equitable, and sustainable transportation system in the central Puget Sound. Please do not hesitate to reach out if you would like to discuss any of WSDOT's comments.</p> <p>Sincerely, RM:rm</p> <p>Enclosure: WSDOT Technical Comments</p> <p>cc: Patty Rubstello, WSDOT Marshall Elizer, WSDOT Robin Mayhew, WSDOT Mike Cotten, WSDOT John Wynands, WSDOT Kerri Woehler, WSDOT</p> <p>WSDOT technical comments for the Vision 2050 draft SEIS April 15, 2019</p> <p>Page number Comment</p> <p>Page # 35 In the first paragraph, suggest this edit because Connecting Washington includes funding for more than state highways: "Connecting Washington state highway funding 1packageapprovedin 2015 and various local initiatives..."</p> <p>Page # 35 Washington State Ferries has 23 vessels now. The WSF 2040 Long Range Plan calls for 16 new vessels by 2040 and it forecasts ridership to grow 30% by 2040.</p> <p>Page # 36 This document refers to the Long Term Air Transportation study completed in 2009. This is a legacy document that has been replaced by the Washington Aviation System Plan completed in 2017. <a href="https://www.wsdot.wa.gov/aviation/Planning/">https://www.wsdot.wa.gov/aviation/Planning/</a></p> <p>Page # 36 Under Freight considering adding primary freight routes in Kitsap County, which are SR 3 and SR 16. '</p> <p>Page # 36 Intercity Passenger Rail Section: The information provided is out of date. The 20 American Recovery and Reinvestment Act (ARRA) projects referenced in the first bullet point have been completed. Later this year, WSDOT will start developing a new Service Development Plan that will identify the next round of rail projects to reduce travel times, increase reliability, and increase capacity for Amtrak Cascades between Portland and Vancouver, BC.</p> <p>Page # 37 Change Puget Sound Gateway Program paragraph. Instead of "relieve traffic congestion" say "manage congestion."</p> <p>Page # 73 The executive order 90-04 was rescinded, see: <a href="https://www.aogovernor.wa.gov/sites/defaultfiles/xeorder/EO_15-04.pdf">https://www.aogovernor.wa.gov/sites/defaultfiles/xeorder/EO_15-04.pdf</a></p> <p>Page # 73 State laws and permits regarding archeological sites may be added, per RCW chapters 27.44 and 27.53.</p> <p>Page # 107 Under Urban Land: Increased density, infill, and redevelopment in urban areas adds pressure to convert industrial and freight-dependent areas such as ports, rail yards, truck parking, and warehousing.</p> <p>Page # 117 Transportation impacts are only measured for personal travel. Freight movements are increasing faster than population growth and should be included in your analysis as they have a significant effect on the transportation system, economy, and environment.</p> <p>Page # 123 First bullet states "Install new traffic signal systems or improve existing ones." WSDOT evaluates Intersection control- both traffic signals and roundabouts before recommending installation or improvement on state facilities. It may be better to keep the language more generic.</p>	Many of these technical comments have been addressed in the final SEIS.

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Alex Jones	1	It is clear that as our region grows, we cannot permit additional unfettered growth into our unincorporated regions. You can read about it in your own document. Growth that is uncontrolled will result in the lost of habitat for many endangered animal species, water shed/runoff impacts from increased roads, more emissions from more driving/car oriented communities, more traffic for the same reason, etc., and a million and one more impacts you can read about in your own EIS. The only viable option to preserve the quality of life of the people who live here, sustainability is to turn the Puget Sound into a more urbanized area. Now you could argue that "people generally want to live in Single Family Homes" and while that may be true, they also generally want to sniff cocaine out of a strippers [expletive], but we as a society don't try to accommodate that, never mind encourage it like we do Single Family Home living via high way subsidization. Please make the right choice and select the urban hub focused option.	Comment noted. Regional agreement on a vision for our future growth is one way that PSRC contributes to changing undesirable trends and lack of coordination.
Alex Tsimerman	1	Sieg Heil, my fuhrer. Guys, my name Alex Tsimerman, so I want to speak about what you talk right now. And I give you classic example of what has happened. Today in Bertha Room in city hall Seattle, Bertha Room, approximately 300 people, mayors, everybody who represents Sound Transit, ex-Governor Gregory, and all speaking about only one concentration, about transportation. So what I want to explain to you as the meeting will go all day. So all elite, all top level come and will be talking about transportation. Guys, what surprises me is this makes me absolutely sick because I don't understand it. No one from these 300, not yours, 300, no one stand up and officially talk, stand up and officially talk. I am against transportation Ponzi scams. No one, guys, you understand what is you did, you bring something what is absolutely identical what did before German Nazi Soviet communist. You reject everybody who have fundamental different opinion. Yeah we can talk about chair left, chair right, street here, street here, but no one publicly and I go to Sound Transit, to you, to everybody and I never see one talking. Guys stop this mafia principal, this Ponzi scam for \$100,000,000,000. No one. How is this possible. How is this possible. It is possible for one particular reason. And I told you many times before, you are more dangerous than Nazis or communists because they did use(?) a constitution. You in America, in Seattle, in State Washington did something what is very unique, it is pure fascism.	Comment noted.
Alexander Thomson	1	I fully support the transit focused growth strategy. The impact to ecosystems, the reduced carbon footprint are both major reasons why I support this path forward.	Preference for the Transit Focused Growth alternative has been acknowledged.
Alice Lockhart	1	I am stunned that none of the three alternatives undertakes a meaningful reduction in green house gas (GHG) emissions. Please provide a third alternative that takes into account the IPCC's conclusion that we have only 12 years ( 11 remaining now) to drastically curtail GHGs ( <a href="https://www.ipcc.ch/sr15/chapter/summary-for-policy-makers/">https://www.ipcc.ch/sr15/chapter/summary-for-policy-makers/</a> ). Please write a fourth alternative in which GHG reduction is the primary consideration in all policy, from where growth will occur (in the urban core, near transit), where it should NOT occur (farm land and forest, for reasons of food stability as parts of our farmland suffer saltwater incursion and California suffers desertification, and carbon sequestration), to the transportation choices we must make now to curtail GHG emissions that result from transportation in our region. Every policy has a GHG component, and for each, the minimum GHG emission possible should be chosen. Also brand new policies to create welcoming, walkable, transit-rich cities, surrounded by carbon-sequestering farm and forest are imperative if our kids are to have a livable future.	Note that the GHG analysis includes vehicle emissions from current growth patterns, in addition to future growth. Due to these current growth patterns, policies are needed that address both. Recognizing climate change is a key issue, VISION 2050 has been updated to include a new stand-alone Climate Change and associated policies and actions.
Andrew Sang	1	Dear PSRC, I would like to lodge support for the Transit Focused Growth alternative. Your own EIS claims it has the best outcomes with respect to housing, transportation, and equity. The fact of the matter is, the single family housing paradigm is not sustainable economically or ecologically. The amount of land that Single Family Homes waste, the amount of municipal services they need (such as roads/highways, utilities, etc.), and the amount of ecological damage they cause in the form of increased emissions from additional driving (because transit isn't feasible), increased distance to farms necessitating more transportation infrastructure, and damage to watersheds/habitats simply does not merit the comparatively tiny amount of property tax they bring in when looked at next to apartments or other land uses.	Preference for the Transit Focused Growth alternative has been acknowledged.
Andrew Sang	2	All that being said, if at all possible, I believe that there should be a "super" version of the transit focused growth as an alternative, acting as a wholesale moratorium on new greenfield "sprawl style" development and a much greater focus on additional high density MFH built near HCT and in Seattle. There exists no reason at all to continue perpetuating auto oriented development. You may say "people want to own a single family home" but sometimes people want things they cannot have, if it comes to the detriment of society at large. It is incumbent upon the PSRC to tell people "you cannot have this" if what they want will contribute heavily to housing unaffordability, carbon emissions, environmental degradation, and increased automobile reliance/traffic. To build wealth, folks should be putting their money into stocks anyways rather than the housing market, where every single dollar of "returns" falls upon the next generation as a "cost" of housing.	PSRC continues to work collaboratively with jurisdictions and organizations to address growth management in the Puget Sound area.
Andrew Sang	3	If a "super" transit focused growth alternative is not possible, I believe that the PSRC should work with relevant local authorities to enact some sort of a high "urban sprawl excise tax" to heavily disincentive the development of additional greenfield sprawl. Additionally, areas such as Kent and Woodinville should cease developing additional single family homes, and focus on industrial, working class jobs accessible to middle class people. Please do the right thing, and stop urban sprawl.	VISION 2050 contains policies that promote compact development and the creation and preservation of open space and natural areas.
Ann Stevens	1	Increase density in currently developed areas. Reduce the allowed ground coverage for buildings on lots to protect trees. We can have smaller houses and this will not decrease density and it will protect trees and green space. Protect current open spaces from development. Do not increase areas where growth allowed.	VISION 2050 contains policies that promote compact development and the creation and preservation of open space and natural areas.
Barbars Joyner	1	Legislation is needed to enforce responsible design criteria on new towers downtown. Density will only succeed if it preserves a safe, functioning and healthy environment for existing and future residential neighbors and people working downtown. Seattle needs density but not without limits. Nearly a dozen towers pending approval are being passed without addressing public concerns on their site-specific impacts. If towers aren't designed to fit individual site conditions, existing buildings, city streets and the environment will be the losers. There's only one chance to get this right before downtown Seattle is irrevocably reshaped for generations to come.	VISION 2050 contains policies that promote planning and design that improves quality of life, safety, and health. Development regulations are addressed through local regulations.

Commenter	Comment Number	Comment Text	Response
Blake Wedekind	1	The transit focused option makes the most sense to me. Let's prioritize sustainable transportation options and walkable cities, and make the most out of our light rail investment. I do believe this will improve the quality of people's lives that live in the transit growth areas. Thank you!	Preference for the Transit Focused Growth alternative has been acknowledged. VISION 2050 includes policies around sustainable transportation options and walkable cities (see the Development Patterns and Transportation sections).
Brad Book	1	Transit focused growth makes the best sense. It provides less impact on the environment and will help minimize transportation impacts. Focusing growth near transit channels (including light rail) will provide improved efficiency for infrastructure, construction development and less impact on existing communities that would be affected by urban sprawl.	Preference for the Transit Focused Growth alternative has been acknowledged. VISION 2050 includes policies around sustainable transportation options and walkable cities (see the Development Patterns and Transportation sections).
Brad Book	2	A focus toward protecting our natural resources is essential in preserving the charm of our area.	VISION 2050 contains policies that address this topic. See policies and actions in the Environment and Development Patterns sections of VISION 2050.
Bryan Weinstein	1	Reset growth - NO - this alternative is in violation of the Growth Management Act which attempts to corral growth into the places where we have decided it should go in the first place. Sprawl is not the answer.	Comment noted.
Bryan Weinstein	2	Transit based - this only works when there is equity placed on all participants including businesses; right now individuals are paying the highest prices for transit and many of us can no longer afford to live in our neighborhoods because of skyrocketing property values, taxes and the taxes placed on vehicles and most of us can't wait another 20 years for light rail - we will be dead by then!	Comment noted. VISION 2050 contains policies that address housing affordability and equity (see the Housing section).
Bryan Weinstein	3	The only alternative seems to be "stay the course" and this is also poor - most cities have done an awful job of "managing" their growth, the housing crisis is here and there are so few affordable housing alternatives available - the majority of these homes seem to be for tech people and they alone do not make up the economy. If Microsoft or Boeing, Amazon or any other of these tech firms left, there would still be thousands of people here working regular jobs that also need housing.	Comment noted.
Bryan Weinstein	4	I would say, "stay the course" but make some thoughtful and immediate refinements to accommodate the growth that is happening now and will happen in the future, as well as start thinking about the longer term, "where is light rail going to land" in some of the cities (like Issaquah) that have done nothing in this regard.	Comment noted.
Carolyn Hollack	1	Recommend you research the future of work and the impact it has on assumptions in this study regarding commute time.	Thank you for your suggestion.
Carolyn Hollack	2	Additionally the impact of blocking more light has been proven dangerous for health (there are experts at University of Washington in this area), so the general impacts hidden in your study under "Visual Quality" need to be called out as health impacts, not visual.	Thank you for your comment. VISION 2050 includes policies that address health and quality of life through good urban design, which should include analysis of shadow. In addition, discussion of health impacts from reduced sunlight added to the Final SEIS.
Carreen Rubenkönig	1	The three alternatives: Transit Focused Growth provides the best impact for the environment and intensifies the use of existing services to serve those who can benefit	Preference for the Transit Focused Growth alternative has been acknowledged.
Carreen Rubenkönig	2	Potential impacts and benefits: Please format a response for lifestyle categories - simply: children/families/retired/single adults (use whatever categories already exist. I'd like to read how each 2050 Growth Alternative provides options for each 'lifestyle' category.	Given the regional scale of alternatives and long-term timescale considered (through 2050), the level of detail for the alternatives and environmental analysis has been conducted at a board programmatic scale. Localized impacts specific to each lifestyle category is beyond the scope of this document.
Carreen Rubenkönig	3	Criteria for selecting a preferred alternative: Could "livability" standards be applied for lifestyle categories for each of the three 2050 Growth Alternatives. Consider using: walkability/affordable housing/transit availability/access to jobs/integrated communities/access to services, etc.	As suggested, livability is a complex concept integrating many topics. The SEIS measures were designed to cover these topics. Criteria for selecting a Preferred Alternative are described in Appendix D.
Carter Burns	1	I guess my comment would be to stay the course, but even that is poor option given the rampant growth going on all around south sno county. I definitely do not support growth of mass transit into the area especially in the Clearview community.	Preference for the Stay the Course alternative noted.
Carter Burns	2	I believe that supporting the preservation of truly rural areas with NO high density multi-level dwelling or other structures is important to Snohomish County and the well being of the public in general. Minimum lot sizes should be no less than 1 acre in my opinion in these rural areas. High density community plans should be avoided, especially if road/highway capacity is not available. Commercial zoning should be restricted, and allowed only as needed to support the communities in the area.	VISION 2050 retains policies that seek to preserve rural areas and discourage higher densities in rural areas. See policies and actions in the Development Patterns section of VISION 2050. Additional mitigation measures were added to the Final SEIS per comment.
Cary Westerbeck	1	I'd prefer to see the transit focused growth, by far. I believe we need to return to compact, walkable, pedestrian-friendly cities and business districts dispersed throughout core cities. I also think halting climate change is critical and the "TFG" approach does this best. I'd also like to see a dramatic halt to auto-oriented development. We need to be able to go about our days and needs without a car as prosthetic device.	VISION 2050 contains policies that support compact and walkable development patterns, please see the Development Patterns section. In addition, VISION 2050 has been updated to include a new Climate Change chapter and associated policies and actions.
Cary Westerbeck	2	We also need greatly expanded housing choices throughout single family zones (banish exclusionary s.f. only zoning) allowing for "missing middle" housing everywhere and a repeal of all minimum on-site parking requirements asap in all cities and counties.	VISION 2050 contains policies that address this topic. Please see the Housing section for policies and actions around housing.
Chris Philips	1	This is a pointless exercise. Those of us paying attention already know that the regional leadership will do what it likes regardless of input from the citizens.	Comment noted. Input from the public, agencies, and organizations were considered in the development of both VISION 2050 and the Final SEIS.
Chris Philips	2	That said, the solution to growth is to enable construction: Approve high-rise downtown living with ample parking and efficient mass transit. Stop penalizing developers, who must pass the penalties on to buyers, which creates \$500k studio apartments, forcing even upper-middle-income family-wage earners out to the suburbs.	VISION 2050 includes policies and actions on housing choices and affordability.

Commenter	Comment Number	Comment Text	Response
Chris Philips	3	Speaking of suburbs, stop choking our regional single-occupancy roads. BUILD MORE LANES. Not bike lanes, HOV lanes or transit lanes- honest-to-God single-occupancy and truck transit lanes. Yes, more roads, more freeways, even if the bugs and bunnies crowd don't like it. Haven't any of you people been outside of North America?	Comment noted.
Chris Philips	4	Stop- STOP- pretending you can "solve" global warming. Even assuming man is causing the problem (he's not) there's no way anything you do in Puget Sound will counteract what the rest of the world is doing. Why are you punishing me because some factory in Shenzhen is burning coal?	Comment noted.
Chris Philips	5	The way to manage growth in Puget Sound is to allow it. It's not rocket science, unless, of course, you're a regional planner. PS: Proof of how imbecilic you people are: I'm required to prove I'm human in order to comment. How important do you think you are?	Comment noted.
Christine Coyle	1	In my opinion, growth should be limited to Transit Focused Growth in order to serve the most people and allow for growth, meanwhile preventing sprawl and conserving the rural environment. I am completely against resetting urban growth area which leads to sprawl, congestion, and strains the environment. There are countless credible studies showing the detrimental impact of urban sprawl and this is the opportunity to prevent it here. Thankyou	Preference for the Transit Focused Growth alternative has been acknowledged. VISION 2050 includes policies on compact development and environmental protection (see the Regional Growth Strategy, Development Patterns, and Environment sections).
Cliff Hanks	1	I do not like the Urban Reset Growth option. It makes more sense to increase growth in cities and areas served by transit.	Comments and alternative preferences noted.
Connie Combs	1	My comments pertain to Appendix H: Equity Analysis. Page H-5 mentions that the population of people of color is growing rapidly, indicating there is an increased need to ensure that PSRC's VISION 2050 addresses regional racial disparities in housing, health, education, wealth (etc.). This means there is a need for VISION 2050 to include goals and strategies for ending racial disparities. VISION 2050 does not have enough focus on ending racial disparities, and does not mention, or define racial equity. At the very least, a shared definition of "equity" would greatly improve the ability of jurisdictions to translate the PSRC equity analysis into something useful for their work. I have suggested previously that a simple definition for equity would relate to non-disparate outcomes. If you've done racial equity work correctly, you would end the disparate outcomes by race. Racial equity work is in the interest of eliminating disparities by race. Appendix H mentions increasing "access" several times. Access, Inclusion and Equity, are all very separate, and all very necessary. If VISION 2050 focuses only on access, it will fail to include marginalized and minoritized communities, and will be unable to achieve racially equitable outcomes. By emphasizing the role of "access" and leaving out discussion of racial equity, VISION 2050 risks perpetuating the racial disparities of the Puget Sound Region. Research such as Richard Rothstien's book, The Color of Law, show us that racial disparities in housing (and likely other areas, though the book focuses primarily on housing) are not a phenomenon resulting solely from individual "bad actors", but rather from systematic exclusion and discrimination championed by all levels of government. Such research shows us that the government has a legal obligation to repair those harms. PSRC's draft of VISION 2050 is currently an example of a governing body failing to recognize the causes, and address, racial disparities. Thank you for considering my comments as you endeavor to improve the lives of residents and visitors of the Puget Sound Region.	VISION 2050 has been updated to include additional considerations on equity. See the following sections for equity related polices: Regional Collaboration, Environment, Development Patterns, Housing, Economy, Transportation, and Public Services. A definition of "equity" was added to Chapter 5, Appendix H, and the glossary of the SEIS.
Dan Wallace	1	As a Seattle Realtor since 1977, I am for the 'Reset Urban Growth' alternative. Seattle has been slaughtered with people, construction and growth since the year 2000 and housing costs reflect the demand for 'close-in' housing. Growth in other (unincorporated) areas would take some of the burden off the city of Seattle and create jobs in outlying areas where housing is more affordable and land is more plentiful. Citizens would be more likely to live in the areas they work as opposed to many Seattle workers who now have a long commute everyday because they cannot afford to live in an urban area with sky high housing prices.	Preference for the Reset Urban Growth Alternative noted.
Daniel Salinas	1	My preference would be transit based growth to maintain focus of the available tax dollars to achieve maximum benefit. Staying the course hasn't worked, is underfunded and we are left with a large amount of unfinished roadways and development that is happening without infrastructure to support it. It is always easy to build on new ground and takes more talent to reform the structure of our towns and cities into ones that meet the new demands. Resetting urban growth runs a huge risk of burying our greatest asset, the reason people move to this area; its natural beauty. We have seen greater damage to our environment by untamed development that moved well ahead of infrastructure while endangering wetlands, critical habit forests and waterways. It also puts greater pressure on emergency resources, maintenance and monitoring that haven't the funding to keep up with the growth. Keeping it to the transit centers allows for growth where people need it most and where resources are already established. I live in Cathcart and have seen the irresponsibility of the current plan that left both HiWays 9 and 522 unfinished creating bottlenecks to those living out this way. In closing: Option 1 "Stay the Course" is a big NO, it is a failure; Option 2 "Transit Focused Growth" gives us the best option for the environment and economy and is a YES for me; Option 3 "Resetting Urban Growth" is a NO as it creates to many costly issues and environmental concerns.	Preference for the Transit Focused Growth alternative has been acknowledged.
David Hancock	1	I strongly support the Transit-Focused Growth alternative.	Preference for the Transit Focused Growth alternative has been acknowledged.
David Hancock	2	I also strongly support the push for thorough a racial equity analysis that a coalition of organizations including Puget Sound Sage, Futurewise, and Transportation Choices Coalition are spearheading.	VISION 2050 has been updated to include additional considerations on equity throughout the region. See the following sections for equity related polices: Regional Collaboration, Environment, Development Patterns, Housing, Economy, Transportation, and Public Services. An action in VISION 2050's Regional Collaboration section calls for the development of a regional equity strategy.

Commenter	Comment Number	Comment Text	Response
Derek Young	1	<p>Re: Vision 2050 DSEIS Comments</p> <p>Dear Mr. Brown:</p> <p>Thank you for the opportunity to comment on the Vision 2050 Supplemental Environmental Impact Statement (SEIS). I want to make clear from the outset that unlike my role representing Pierce County on the Growth Management Policy Board (GMPB), I am commenting here on behalf of only myself.</p> <p>I would also like to thank the excellent work by Puget Sound Regional Council (PSRC) staff preparing the SEIS and working with the GMPB throughout this process.</p> <p>Preferred Alternative</p> <p>Staff's analysis makes clear that the Transit Focused Growth Alternative aligns with our stated objectives in favor of protecting rural working and wildlands, Puget Sound recovery, building healthy and sustainable communities, while decreasing greenhouse gas emissions and commute times.</p> <p>That said, I agree with the comments made by the Council Chair and Executive on behalf of Pierce County that there is concern about this alternative's consistency with what we know about vested development rights and buildable lots in the rural and unincorporated urban growth area.</p> <p>If we treat those targets on the upper bound as guidance rather than a rule that could result in compliance problems for our comprehensive plan, there should be no issue. However, we can reduce market demand being pushed to outlying areas by setting firm minimum density requirements around High Capacity Transit (HCT).</p>	<p>Support for the Transit Focused Growth alternative, as well as concerns, have been noted. The Preferred Alternative includes changes to population and employment distributions based on feedback from Pierce County.</p>
Derek Young	2	<p>Jobs-Housing Balance</p> <p>I do appreciate the extra attention paid by staff and the GMPB to the issue of Jobs-Housing Balance. Though Vision 2040 anticipated a multipolar economic development model with jobs and housing growth throughout the region, I would expect everyone can agree that we've failed to deliver on that promise.</p> <p>The jobs-housing index utilized by staff (see Figure 4.1-1) shows each alternative anticipates imbalance throughout the region. This appears to be due to staff accepting growth forecasts from the State's Office of Financial Management. I believe this is backwards. Our plan for where to distribute that growth in the region is a matter of policy. We should have a Transit Focused Growth (B) alternative that starts with an index of 1.0 in each subarea, and work backwards from there.</p> <p>While the market will gravitate to demand, housing prices are a tool we can use to show where it is constrained by land use policy. Right now it's signaling very strongly that there is unmet demand for housing in areas that have experienced the most significant amount of job growth, specifically in "Sea-Shore" and "East King" subareas. This constraint displaces those unable to compete with higher salaries and are forced to commute ever further away into parts of the region that have benefitted least from the economic growth experienced in King County. Our regional plan should counter, rather than exacerbate this inequity including consideration of policies that promote job creation outside the subareas with the highest jobs-housing index to help address the existing imbalance.</p> <p>Further, if those housing demands are not addressed, and the jobs-housing imbalance accepted and even anticipated within Vision 2050, then our regional growth strategy is internally inconsistent with the goals stated within the plan. Without jobs-housing balance throughout the region we will encourage more growth away from transportation infrastructure and into smaller communities and rural areas increasing CO2 emissions, stormwater pollution, reducing habitat and open space, while displacing lower-income people least prepared to handle additional transportation costs.</p> <p>It's difficult to think of a major social problem we have in our region unrelated to the concentration of employment and wealth in jurisdictions unwilling to allow for enough housing to accommodate that economic growth. Increased homelessness, transportation costs, impacts to health, and even time spent away from communities and families are all harmed by the jobs-housing imbalance.</p> <p>We need to think about housing the same way we do roads and transit — as infrastructure for jobs.</p> <p>We must establish a standard ensuring that each county plan for enough housing to accommodate job growth projections, otherwise I don't understand the purpose of having a regional growth strategy or multicounty planning policies at all. It's the most important reason for doing the work. I would further recommend that we consider using the subregions identified in the jobs-housing balance section.</p>	<p>Comments on jobs-housing balance noted. VISION 2050 includes updated policies in the Regional Growth Strategy, Housing, and Economy sections on improving jobs-housing balance. The Transit Focused Growth and preferred alternatives result in the most balanced ratio of jobs to housing.</p>
Derek Young	3	<p>Unincorporated geographies</p> <p>I appreciate the attempt to develop some nuance within the unincorporated area by allowing for designation as High Capacity Transit Communities. However, this still leaves ambiguity for the remain areas. Allowing for designation by community planning area, similar to our cities, would be a more logical way to differentiate unincorporated areas from each other.</p> <p>For example, the UGA surrounding the City of Gig Harbor and planned for annexation there is generally similar in development pattern and zoning to the City as a small outlying community surrounded by rural area. Meanwhile, South Hill, adjacent to and similar in zoning and development to Puyallup designated as a Core City, would have the same geography assigned to it as the Gig Harbor UGA.</p>	<p>The Preferred Growth Alternative updates some regional geography classifications, particularly in Pierce County, to include additional urban unincorporated areas with future transit service in the High Capacity Transit Communities geography. For example, the South Hill community planning area in Pierce County is now designated as an HCT Community in the Preferred Growth Alternative.</p>
Derek Young	4	<p>Health Impact Assessment</p> <p>As we've become more aware of the public health benefits of smart planning policies, it's essential to include a Health Impact Assessment in our environmental analysis. HIA's are recommended as potential mitigation within the draft SEIS (see Table 4.9-1). This request probably should have been made during EIS scoping, but since this is an EIS for a public plan rather than a private development, I thought it was worth making. I'm sure our public health departments could assist PSRC staff in developing an HIA.</p> <p>Conclusion</p> <p>Thank you again for the opportunity to comment. Based on discussions at the GMPB I think we've all recognized, to one degree or another, the issues and concerns I've tried to address here. I hope these comments help move the process forward in a productive manner and, as always, I'm available to discuss them in greater detail at any time.</p>	<p>Concur regarding the importance of planning for health. The SEIS is a plan-level and regional-scale analysis, and many measures throughout the SEIS are related to health such as air quality, access to parks, and jobs accessible by walking, biking and transit. Appendix D provides a summary of the measures related to health.</p>

Commenter	Comment Number	Comment Text	Response
		Sincerely, Derek Young Pierce County Councilmember	
Elaine Nonneman	1	Has information on Vision 2015 and the draft and final SEIS been mailed to households and businesses in all targeted communities and in various common languages? A failure of the MHA process was assuming people would happen to find the information online, and waiting until nearly the end of the comment period for the EIS to supply information about it in multiple languages. The intent was clearly to exclude people most impacted by displacement.	The VISION 2050 update process and environmental analysis was based on an extensive public engagement effort including comment periods, public meetings, community events, and open houses. PSRC completed outreach through surveys, social media, local news media, community organizations, local governments, and PSRC's website and email list. Materials were translated into multiple languages. Details on minority and low-income population engagement is further described in Chapter 5 of the SEIS.
Grady Helseth	1	Alternative 2 was adopted by the [Snohomish] County Council. It puts most growth in the existing cities, especially Everett and Lynnwood. Please do not allow the Seattle Master Builders extend the SWUGA any further east. This will endanger Little Bear Creek and turn Highway 9 into a Highway 99 nightmare with commercial development and even more traffic. Please leave the rural areas rural. And STOP letting the schools and churches purchase land on the edge of the UGA and even into rural areas. It creates huge traffic problems down the line as can already be seen on 43rd Avenue SE east of Mill Creek.	Comment noted. VISION 2050 includes policies that support compact development and protect rural areas (see Regional Growth Strategy and Development Patterns sections).
Gurvinder Singh	1	I live in the Ravenna neighborhood and am excited about the light link rail opening up in UW and Roosevelt in the coming 2 years. However we do not have a good connection from metro to the light rail station at UW stadium, but I heard a possible route 327 being considered to connect the future UW and or Roosevelt station. Please count me as a big supporter for this connector route. Thank you.	Thank you for your comment. Please consider contacting King County Metro in support of local bus route connections.
Heather Bruce	1	My preference would be to either stay the course or focus on Transit areas. Please do NOT reset the urban growth areas into the rural zoning. If there MUST be a rural reset, PLEASE KEEP THE RURAL RESET TO NO LESS THAN 1 ACRE LOTS. 1 acre lots retains space for families to have gardens and some small livestock, while still allowing some increase in density. Old fashioned neighborhoods breed healthier people. In addition, there are issues with wildlife habitat and watersheds in the rural zoning, that should not be ignored.  Consider and implement ALTERNATIVE and INNOVATIVE housing solutions, like tiny houses, easier to permit ADU's, CLUSTER HOUSING and other sorts of solutions that utilize existing infrastructure. Preserve quality of life not just expanding businesses. If your ideas don't say: Pleasant, Comfortable, Welcoming, Homey, Friendly, Charming, Safe and Sustainable, steer clear of them!  Please remember your existing property owners and tax papers and insure quality of life....we are trusting you to represent the CITIZENS of Snohomish County FIRST and businesses second. Thank you for your efforts to attain GMA goals while respecting the citizens of Snohomish County.  Heather Bruce Clearview resident of 32 years	VISION 2050 contains policies that address the preservation of rural lands and housing choices and affordability (see Development Patterns and Housing sections for additional information).
Heather Porter	1	Alternatives - Stay the course. Things are great as is.	Preference for the Stay the Course alternative has been acknowledged.
Hendrick Haynes	1	2.8 Water Quality and Hydrology (pp. 48-53) For pages 48-53, and looking back to page 46, bottom paragraph, work by the GMVUAC in enforcing a zoning lowering and blocking of the making of a Maple Valley Asphalt Facility on the old Indian Coal Mine site is an effort to promote wildlife and endangered species recovery, promote "rural character", and engage "Climate Change" issues inside of page 47, bottom paragraph, "connected network of habitats for wildlife to move through as conditions change". This work also is consistent with page 48 at 2.8 "Water Quality and Hydrology", in terms of working to safeguard the Cedar River Aquifer and river system (see also 2.9.2 "Water Supply Considerations" and page 55, top paragraph., "to deal with growth and uncertainty"). Sadly, much water is mismanaged and wasted. On page 48, under 2.8.1 "Impervious Surfaces", the closing sentence should read "and improvements to storm water management, including emphasizing conservation of water flows and redirection or repurposing of waterflows to wetland and wildlife basins promoting water resources recycling, cleaning, the recharging of the aquifer, and for natural areas, parks, and/or recreation purposes." Currently, a very high percentage of impervious surface area run-off is piped away and discharged quickly into corridors which flow quickly to the sea and supply little wildlife opportunity. Also, there are conflicting use pressures along critical water supply corridors, such as (as an area example) the location of various kinds of vegetation removing and impervious surface area creating industries along the Cedar River Canyon corridor.	Thank you for your comments on water quality. This suggestion has been incorporated into the SEIS.
Hendrick Haynes	2	2.10 Parks & Recreation (pp. 56-61) 2.10 "Parks and Recreation", 2.10.1 "Existing Open Space Resources", and 2.10.2 "Park and Open Space" (pg. 56), and its operation to encourage wildlife and areas connectivity to nature, and to quiet the human mind and soul. On page 56 in the green bar, what "quality of life" is needs to be defined. Otherwise, it could be made out as anything and taken for granted attributes (in the "bundle of sticks") can be taken wholesale away. This idea or ideal should be often upgraded and reached for as a human and natural (including wildlife) experience, as this provides aesthetic guidance as to how designers may elevate and broaden the sharing of what is most important in the human and "Gia" (earth) condition. While 2.10.4 "Access to Wild Open Spaces" complains about the need to have a car to access these spaces, no mention is made of the clubs, groups, car pools, and other alternatives that are available for this and have been so for many decades (one example: THE MOUNTAINEERS, which is only a phone call away; also one can form a group and each chips in a few bucks to buy a club car (and resources), and they can use that for hiking events). Closing line here should encourage networking themes specific to open public meeting areas, such as local library resources, and planning for	Thank you for your comment on parks and recreation. The mitigation measures have been updated to include support for organizations that provide access to recreational opportunities.

Commenter	Comment Number	Comment Text	Response
		group outings, which may be open to everyone. VISION 2050 should promote formations of such groups using community resources that are currently open and available.	
Hendrick Haynes	3	<p>2.11 Environmental Health (pp. 61-64)</p> <p>Recognize what makes human beings innovate and be productive, and encourage these surroundings and processes. There is a great deal of literature on this, and in examples with both in rural settings and in corporate research and development campuses. In Section 2.11.2 "Human Health", it is noted that "there is potential to exacerbate localized air quality and noise impacts, and to adversely impact environmental health (see Section 4.4 and Section 4.14 for additional details)". Impacts such as "obesity, diabetes, heart disease, and stroke mortalities" can be significantly affected by noise (and other stress causing effects), and truck and vehicle emissions, and these impacts as called out in the references of 2) above (many scientific papers representing only a very shallow sampling of the research done). See C) above. These adverse health impacts reduce productivity, drive up health care costs, reduce fertility, drive up education costs, and impair regional development. Start-up and maturing enterprise solutions would want to improve productivity and drive down health care costs, so they would leave or avoid areas that would have burdensome health care costs and lower productivity in favor of areas with reduced or negligible health care costs and improved worker productivity (which includes themselves; to do otherwise would not be competitive and put them out of business). Enterprises which save money by polluting (and drive these savings onto their bottom line) increase the cost of business and lower the odds of success of others, and can produce a negative economic load on the community far in excess of the short term gains they may receive. In reference 2) above, there is at least one technical paper on this (many available on internet).</p>	Concur with the importance of planning for health. VISION 2050 has been updated to address public health (see the Environment, Development Patterns, and Transportation sections).
Hendrick Haynes	4	<p>2.13 Historic, Cultural, &amp; Archeological Resources (pp. 66-67)</p> <p>In 2.13 "Historic, Cultural, and Archeological Resources", which includes "buildings, bridges, and sites", as well as "beliefs, customs and practices", and sites can include "villages, camps, food gathering, and other seasonal activity sites beginning about 11,000 years ago." (2.13 at 3rd para.). As an example, the Indian Coal Mine site and related postal location is one such possibly eligible site, and is on "shorelines and watercourses" (see ref. 2) above). The last sentence in that paragraph should read "... are often in areas with high rates of development and redevelopment activities. These site historical resources must be allowed to be reconstructed or otherwise memorialized in the construction activities or design of later development (including the creation of structures offering honor or tribute), which may include provisions for a historical timeline content embracing changing culture(s)". Note that the Indian Coal Mine near SR-169 and 196th Ave. SE is not indicated on Figure 2.13-1 "Historical Sites" (mine was once best producing in Western Washington, and also Indians used to camp along the Cedar River, and hunt and fish; and Indians also lived along the river and had children (see Martha George in ref. 1) above). Cultural themes should be maintained to encourage a sense of stability and heritage.</p>	Comments on Historic, Cultural, and Archaeological Resources have been acknowledged. The mitigation table in the impacts section has been updated to reflect these suggestions.
Hendrick Haynes	5	<p>2.14 Visual Quality (p. 68)</p> <p>"2.14 Visual Quality" should be re-titled to say Visual Quality" uses term "Aesthetic Resources" without crafting any long term purpose or vision within this "beauty" or human sensibilities related term. The title of this document is VISION 2050. What guidance are they giving us as to what PURPOSE(S) they wish to visually encourage, express, and "sell"?</p> <p>VISION 2050 promotes a future condition. How may "Visual Quality" be mission purposed and used to promote VISION 2050?</p> <p>What visual themes and cues should be encouraged, brought forward, repeated, studied, enhanced, and elevated? How may this "Visual Quality" term be tied into other elements within the "Aesthetic" human condition and experience (which includes all five senses, there depth of perception in memories, sense of history and culture, and sense of opportunity in promoting a welcoming future). See below.</p> <p>"VISION 2040 FEIS that alter the visual environment persist today." does not offer any sense of mission or tests against some benchmark(s), nor does it suggest what may be done to improve meeting goals (if any) presented in VISION 2050. This chapter is followed by "EARTH". No tying is made between "VISUAL QUALITY" (the ideas of aesthetics and art) as it relates to the seemingly archaic or past uses of expression as "learning or science" (AMERICAN COLLEGE DICTIONARY, by Random House c. 1967 Library of Congress catalog number 67-16082; "art" def. 10 (pg. 70); see Gr. "ars", "artis" (art), "aro" (to join or fit)), which (of course) embraces earth and nature. This baits the question as to how VISION 2050 participants "Visual Quality" themes may contribute to uplifting the human condition through "learning or science" (a definition with a deep and rich reach through history), and support view of "production or expression of what is beautiful, appealing, or of more than ordinary significance." (Ibid., Random House, pg. 70 "art", def. 1), where "beautiful" is "delighting the eye; admirable to the taste or the mind." (Ibid., Random House, "beautiful" def. 1, pg. 108); and "beauty" is 1. that quality of any object of sense or thought whereby it excites an admiring pleasure; qualification of a higher order for delighting an admiring pleasure; qualification of a higher order of delighting the eye or the aesthetic, intellectual, or moral sense.". This definition of "art" also includes "1. Skill in performance, acquired by experience, study, or observation; knack. 2. Human contrivance or ingenuity, as in adapting natural things to mans uses." (Webster's Collegiate Dictionary, Fifth Edition, c. 1936; 1944 ed., pg. 60), which embraces and celebrates nature. Some examples of embracing nature (in a rural context), is the creation and operation of farms, in the making and managing of forests and parks and natural areas (or spaces), and in the balanced practices of fishing and fisheries practices (and also as is found in sustainable aquaculture). While visually these scenes may seem to be easily interpreted, present themselves as satisfying expansive, and be visually satisfying, the underlying culture and science(s) that must be practiced (for sustainability) is deeply tied to a long history of discovery and practice.</p> <p>Compare this under which entomological observers also cite the word "art" to mean "the employing of means to accomplish some end; opposed to nature" (LIBRARY OF UNIVERSAL KNOWLEDGE including THE CONSOLIDATED-WEBSTER COMPREHENSIVE DICTIONARY...", by Book Production Industries, Inc. (c. 1954), pg. 42, approx. at def.'s 2 and 3).</p> <p>In embracing "aesthetic" principles, hopefully the idea of "art" may be to embrace "3. Any system of rules and principles that facilitates skilled human accomplishment; also, the application of these rules and principles: the mariners art." ( The Reader's Digest Great Encyclopedic Dictionary, including Funk &amp; Wagnalls Standard College Dictionary, The Readers Digest (NY) (c. 1967), Lib. of Cong. # 66-21606; pg. 82). In using the aforementioned example, in the mariners art, one learns to work with</p>	Comments on the Visual Quality section are appreciated. Policies to protect and enhance visual and cultural resources are in VISION 2050's Development Patterns section.

Commenter	Comment Number	Comment Text	Response
		<p>the seas and efficiently use its forces to take them where they want to go. Example: Being a global voyaging sailor (e.g., working against (rather than with) the tides, winds, and seas quickly limits or denies ones progress).</p> <p>I am enlarging on the above by adding a new seemingly all embracing idea called "Aesthetics", or as defined in relation to philosophy, the "science which deduces from nature and taste the rules and principles of art." (American College Dictionary (Random House (NY) 1967, Lib. Cong. Cat. #67-16082), pg. 21); and "the theory of fine arts and of peoples responses to them; the science or that branch of philosophy which deals with the beautiful; the doctrines of taste.", and "Aesthophysiology", "the physiology of sensation and of the organs of sense." (Webster's New Universal Unabridged Dictionary, Deluxe Second Edition, c. 1983, ISBN 0-671-41819-X; Lib. Cong. #83-42537; pg. 31). Per above, "Art" refers to "learning or science" (Archaic.) and "the production or expression of what is beautiful, appealing, or of more than ordinary significance." (American College Dictionary (above) at page 70); e.g., the human experience in terms of nature and their environment as it involves all their senses, their depth of memories, and their inter-relationship within their culture and environment. The idea of nature being separated from "environment" seems a conditional and potentially harmful one; e.g., with environment being defined as "the aggregate of surrounding things, conditions, or influences" (Am. Col. Dict. (Ibid.) pg. 402), and by this definition can become and be accepted as a surroundings and/or force which may become and be sustained as something very much against and toxic to the force(s) of nature which sustains us on this planet, and within this universe.</p> <p>Where "art and science" may be offered (by some) as being apposing entities, the definition of "science" is "1. Any department of knowledge in which the results of investigation have been logically arranged and systematized in the form of hypothesis and general laws subject to verification." (rising from L. scientia &lt; sciens, -entis, ppr of scire to know; Ibid. The Readers Digest Great .... "science": pg. 1202).</p> <p>Thus, art and science are joined at the hip and are servants to those who use it for their purposes (see U. S. Const. Art. 1, Sec. 8, Cl. 8 and use of terms "Progress of Science and useful Arts", which presumable has a term "useful" which differentiates it from that which is the opposite, or may fall progressively into some notion of being considered "useless", or perhaps is or may be (or cause something to be) non-productive).</p> <p>We can see how the great cultures in history have expressed this idea by viewing the celebration(s) of forms outside of and within their great surviving monuments, spaces, and other accomplishments; and in studying their Anthropology and Archeology (and the reasons for and against their success(s)). No greater example exists for the use of "Aesthetics" to promote the rise and preservation of cultural objectives than in the study of ancient Greeks and Romans (their language, culture, accomplishments, and artifacts), as much material has been created, uncovered, and preserved.</p> <p>On page 68 at 2.14 "Visual Quality", on page 152, 4.12 "Visual Quality", on page 152 Table 4.12-1 Potential Mitigation Measures: Visual Quality: this "Visual Quality" term as presented is not only too limiting, but also de-limiting (e.g., as used can produce a removal of "limiting floors" and produce a downward spiral in both the short term and long term expressions of the human experiences and/or discovery/creation/use/abuse of the environment). The table itself contains many good points focused only on a "Visual" approach. It seems dangerous as it is not embody the "Human Experience" as it is integrated with the other senses. An example of this may be taking a much loved and appreciated companion on a late springtime sunset horse drawn carriage ride along City of New York's Central Park. on Central Park West Drive past "The Lake", then up W. 77th Street to enjoy a fine meal at the Scalletta Ristorante (Incorporated), then by waiting carriage find their way along Center Drive and W. 57th St. to return to a grandly lit entrance opening to ones luxury suite at Trump Tower on 5th Avenue. This grand experience goes far beyond "Visual" and reaches into the depth and breadth of one's appreciation of all their human senses. and the magic of appreciating each shared moment.</p> <p>A more appropriate main term would be "Aesthetics", or "Aesthetics Quality(s)", which relates to the entirety of the human senses, perceptions, and relational interpretations (see definitions above). "Aesthetic Resources" term in on page 68 (2.14 Visual Quality in green bar) should be replaced with "Visual Aesthetic Resources" (to be more specific), although "Natures Resources" or "Natural Resources" should be used where natures themes are promoted (as is done in many places, such as sculptures, wall papers and tapestries, panoramic paintings, sculptures (hero's on horses, etc.), etc.), for in exploring issues of sensory extremes (and "what is art", what is "beauty", etc.), one may run into conflicts with what cultures may assume as appropriate for them (religious, political, cultural, and social organizations), so it is important to describe what you are after and how things fit in (the mission of morals, politics, law(s), and enforcement). No definition of what these visual "Aesthetic Resources" are given in this title. A dichotomy is drawn between what is "developed" and "undeveloped". The terms "valuable visual features" and "natural features" is used, and "urban and suburban visual resources" expressed including "iconic structures", etc. "that alter the visual environment". A satisfied problem condition (finished design within a setting) is stated without regard to any scientific (objective) or subjective measure, or identified in terms of a solution other than to recognize and emphasize it "Visual" exists. The issue here is the entire human and ecosystem experience, and if and how the human race may become a sustainable compliment within its global environment in order to survive (this condition would apply no matter what planet and universe one may live in).</p> <p>This chapter should therefore read AESTHETIC QUALITY, and have "VISUAL QUALITY" as one of the subheadings. The question then becomes "what are the other subheadings, and "what are the qualities and controls within each (note "nature" is used within the definitions or relationship experiences within idea of aesthetics)".</p> <p>One element to be considered in terms of "beauty" is "personal space", and is seemingly expressed often in the design of great plazas, great rooms, grand staircases, rooms without divisions and expressions of high doorways and entry ways, sweeping curved driveways across broad and open lawns bordered by low flowering perennials, and anchored by a fountainhead water feature spraying columns of movement orchestrated sweet smelling waters. By comparison, please appreciate the cattleman or the dairyman who moves across many broad acres in rounding up their stock; the woodman who goes deep in working the forests; the fisherman who voyages many miles out in the dangerous sea to find there harvest; or the airline pilot who flies high and deep into the darkness to carry hundreds of passengers safely to where they want to go.</p> <p>The senses appreciation of distance and freedom may be for those who do not like crowds or being crammed into tightly packed elevators (perhaps they have had bad past experiences?), and may need to have "space", "distance", and "freedom of movement" and "openness of the senses and the mind" to accomplish their tasks. It is part of the ambiance or "Aesthetics" needed for them to function, and may be seen in their appreciation for paintings and pictures involving hunting scenes and landscapes, as compared to such ideas as cityscapes, "cubist" expressionism, and "Dadaism".</p>	

Commenter	Comment Number	Comment Text	Response
		<p>Note VISION 2050 promotion of "real time traffic services" (e.g.; "Waze, Google Maps", etc., as "innovative methods of managing traffic flow"), in conjunction with "Emerging technologies such as connected and autonomous vehicles" (see page 38), the harbingers of which now crowd through rural back roads and urban neighborhoods. This "off corridor" traffic disturbs and stresses both rural and urban qualities of life, disturbs and destroys rural and urban productivity, and disrupts community relationships and life. This need for space, distance, clean air, clean water, natural balance of odors, natural sounds, etc. would be measured under "Aesthetic Quality" and less so under a focused aspect such as a "Visual Quality" type measure.</p> <p>The danger here is that the more removed from nature people become, the less they understand and appreciate its presence (or lack of it) in our environment, and the less they will appreciate the need for balance with nature and its ability to sustain us. Examples: The dichotomy in discussions about Global Warming. The dichotomy in discussions about Deforestation. The dichotomy in discussions about rainfall and other water resources topics such as the quick disposal of water away from something rather than the more important objective of recognizing (and need to acquire funding for) the need for water recycling and/or collecting and its channeling into ecologically balanced areas supporting wildlife.</p> <p>One element of "Aesthetic Quality" is the characteristics and quality of sound. Examples of this is the quiet of a desert canyon; the sounds of nature across a broad woodland bordered pond; the sounds of ocean surf rolling up against a rocky cliff; the sound of Beethoven's 5th Symphony played by the New York Philharmonic Orchestra; the sound of close encounter gunfire between warring desert armies; etc.</p> <p>Similarly, other elements of "Aesthetic Quality" include the flavor and smells of fine food; the flavor and smells of early morning forest air; the flavor and smells of an Army Mess Tent before serving an early morning mess meal; etc.; until all these individual elements blend into an experiencing and seemingly endless moment.</p> <p>This weighs into examples within the design community in its competition for uplifting the human experience. One example is research into "urban canyon design", and how sound or noise may be channeled, baffled, and noise abated or altered through the creation of and/or channeling for guiding and enhancing or cancelling of pleasing odors, sounds, etc. while extinguishing that which is adverse or unwanted. Bad design can cause much misery and suffering, which is measurable in terms of shifts in creativity, productivity, culture, disease, and crime. This movement also works hard for promoting architecture design and urban planning works which support wildlife and supports interesting and stimulating urban, suburban, and rural natural environments.</p> <p>In summary, note VISION 2050 does not address the VERY IMPORTANT GOAL of overall enhancing the human AESTHETIC EXPERIENCE. No "AESTHETIC QUALITY" goals, and supporting regulations, are proposed.</p> <p>An example of an "AESTHETIC QUALITY" matrix may look as follows, This should be divided up by each class of dweller (rural, suburban, urban, city, etc.), by tested population distribution sector preferences (in plotting out answers to questions, data clumping may be presented around certain types of demographics and lifestyle considerations (including age, family, housing location(s), recreation, upbringing variables, and type(s) of education, etc.). The "rural" lifestyle may find the following types of questions categories pleasing:</p> <p>RURAL "AESTHETIC QUALITY" OF LIFE STANDARDS (opening thoughts)</p> <p>SUBJECTIVE</p> <p>Emotional feelings prized:</p> <p>Physical experiences prized</p> <p>Relationships prized:</p> <p>Sense of consecutiveness and connectivity with:</p> <p>a) community</p> <p>b) culture</p> <p>c) family</p> <p>d) history (past)</p> <p>e) nature</p> <p>f) future (self esteem, plans, working for self and with others in finding success)</p> <p>Proximity (sense of personal space, of freedom; and senses of movement, wonderment, peace, and enjoyment)</p> <p>Sights:</p> <p>Smells:</p> <p>Sounds:</p> <p>Tastes:</p> <p>Touch:</p> <p>Interpretive perceptions based on the interrelationship of memories, physical and personal relationships, contexts, language, etc.</p> <p>OBJECTIVE (with human evolving discoveries and definitions)</p> <p>Systems of sustainable relationships within the universe and our planets ecosystems (astrophysics, physics, geology and biology) which includes our man kinds sustainable place within it, and identifying and addressing the challenges that may imbalance this.</p> <p>Mans ability to identify, grasp, and answer these challenges is a matter of mans workings, in the arts and sciences, and provinces of invention, innovation, and production to extend the solutions for relieving nature of the challenges brought on by us. In this mission is the creation of profitable commercial answers that may be</p>	

Commenter	Comment Number	Comment Text	Response
		<p>delivered both domestically and abroad (this is needed as otherwise entities creating these solutions would be unable to pay their bills and support their own communities).</p> <p>The mission here is to provide a method and means by which we may keep and enhance what is important and positive to us, and remove what is damaging and/or destructive to this positive course we wish to achieve. The VISION 2050 plan provides the rural community no seat by which we may voice and determine this course (we seem to be intentionally left out), and no plan and system of enforceable rules (no enforcement linkages) by which the human condition may rise; e.g., elevate the "AESTHETIC QUALITY" of mankind inside of "nature".</p>	
Hendrick Haynes	6	<p>2.15 Earth (pp. 68-69)</p> <p>2.15 "Earth" notes that "The region is a geologically active area susceptible to earthquakes, landslides, volcanic hazards, flooding, and coal mine subsidence", and states "The need for infrastructure and land use planning, building codes, and critical area regulations to address these risks continues to be a priority throughout the region." and "Geologic hazard areas throughout the region are depicted in Figure 2.15-1", only a "flood hazard area" is depicted. It is known that the Cedar River Canyon has steep slopes prone to landslides, it has mapped liquefaction hazard areas, it has mapped coal mine (and thus subsidence danger) areas, and it has multiple geologic fault lines in the region of 196th Ave. Se and SE Jones Road, and SR-169. This map seems very incomplete.</p>	Comments on the Earth section are acknowledged. The map depicts regional-scale geologic hazards. Local maps provide more detail.
Hendrick Haynes	7	<p>2.16 Noise (p. 70)</p> <p>Per 2.14 above, and the idea of "AESTHETIC QUALITY", with "Visual Quality" being part of this experience, so is "Noise Quality". VISION 2050 provides no remedy in this case, or under VISION 2040, by which disharmonies in Federal, State, and County laws may be addressed. This is not just a local problem, it is an INTERNATIONAL ONE. To the degree this is locally addressed, we find fine shops, quiet and restful parks and natural areas, settlements and visitations by the famous and/or the productive, we find a polite and considerate society, a community or system of settings which draw near and inspire invention and innovation, and a tourism that competes to be inside this setting and share in its intellectual, cultural, spiritual, and natural settings. The ancient British Common Law principle of one's ability to have "quiet enjoyment" in their property would seem to draw mutual respect and courtesy between neighbors, but in Washington State a disharmony exists that brings cruelty, disregard, and tips balances that destabilizes rural areas, towns, and whole communities. This is just one of many forces VISION 2050 fails to address, and may be abbreviated through reciting just a few of the laws which create these tensions (and one "example" condition is given, and which may be "GOOGLED" to better understand its reach):</p> <p>NOISE MITIGATIONS TABLE (see PG. 154):</p> <p>On page 70, at 2.16 "Noise", not enough attention is given this, especially as it is related to the rural environment. Greater emphasis needs to be promoted here as this significantly impacts "quality of life". In Table 2.17-1 "Regulation and Policy Changes Applicable to SEIS Resources", NOISE should be added to their regulation areas of interest.</p> <p>On page 155, Table 4.14-1. Potential Mitigation Measures: Noise, no approach is given by which individual and community complaints may be addressed (such as bringing the subject parties before a counsel and provide for mechanism to stepwise reconcile grievances). Nothing addresses specific noise sources such as "BACK-UP BEEPERS", "JAKE BRAKES", loud banging and slapping caused by the quick dropping of loads or changes in equipment direction (easily remedied by changing equipment use practices and also adjusting equipment properly) other than to state "Install mufflers and other noise-reducing devices..." and "Maintain equipment" .... how can one (or a number of parties) complain and bring this into a forum where action can be expeditiously and easily promoted in a friendly and low cost way? Obviously, it does not help if the response of your elected officials is to legislate immunity for the offenders and promote the community at large to be left with the endless suffering this creates. See RCW's RCW 7.48; 7.48.010;RCW 7.48.010 through 7.48.040., RCW 7.48.120, Crimes; malicious mischief: Chapter 9.61 RCW.; nuisances: Chapter 9.66 RCW., RCW 7.48.130, RCW 7.48.150, RCW 7.48.190 RCW 7.48.200, and disharmonies within Washington State Law Title IV Offenses Against Public Peace, Chapter 9.33 PUBLIC DISTURBANCE NOISE REGULATIONS (especially in ignoring the changing characters, volume, and content of sound and its effects on human and animal stress and health). It seems confusing to regulate noise to be under 40 dB, 50 dB, 60 dB, or even 77 dB, and then allow fixed and mobile equipment to operate impulsively and irritatingly about with some frequency, with fixed equipment and fixtures warning devices and back-up BEEPING devices, operating at 80-120 dB plus, and engines (loaded) operating at 80-120 dB plus, all promoted as legal as the measure for sound is based on some longer term averaging and a complete disregard for the qualities of and within the sound signature. These noises can radiate irritatingly for miles down and/or across a canyon corridor feature and disrupt the activities of homes and businesses containing hundreds and even thousands of people. These devices were only suppose to warn traffic and individuals of prospective equipment movement within a few dozen yards of a location (and warn only a hand full of select safety conscious people). Clearly, there is a failure in meeting design purpose. Solutions to this problem are quick and easy to design, easy to make and install, and readily applied at a modest cost. Enforcing codes to encourage change, and enforcing codes for a local source of supply, would encourage local invention, innovation and support to address this NOISE challenge, and as you may see by GOOGLING this issue, a market for this (these) solution(s) may be global.</p> <p>The idea of "AESTHETIC QUALITY" and elevating the human condition is a center point of invention and innovation. In order to be successful in this purpose, one must live in a supportive community; e.g., they must support the inventors and labor pool who work so hard for their benefit. It is respectfully urged that the Puget Sound Regional Counsel (or "PSRC") community recognize human needs and challenges, and encourages local invention and innovation through legislation, regulation, and enforcement including matching up inventors and innovators (and available resources) to profitable community challenges (they should get paid for their work and expenses just like everybody else does).</p> <p>CONCLUSION</p>	Comments on the Noise section are acknowledged. Additional noise mitigation measures were added to the SEIS and VISION 2050 contains updated policies to reduce and mitigate noise impacts. More specific regulations are provided at the local level.

Commenter	Comment Number	Comment Text	Response
		<p>We live in a beautiful place that is progressively being killed off by special interests. This does not have to be. If we are polite and considerate of each other and the ecology that surrounds us, we can be a part of the Aesthetic Experience that is so important to the lifestyle and productivity of this region. We have laws with preambles which should support this. The Aesthetic experience is "in the dictionary" and is an old set of ideas.</p> <p>On page 70, under 2.16 "Noise", a problem is expressed and no solution(s) proposed. Rather:</p> <p>Road, rail, and air traffic sources account for the majority of noise in urban areas, with additional noise generated by commercial/industrial uses, construction, pets, and stereos/radios (King et al. 012). Recent studies suggest that planning strategies emphasizing increases in urban development densities and mixed uses may lead to an increase in exposure to traffic, construction, and related urban environmental noise (King et al. 2012). It can be assumed that as the region has grown over the last decade, so have noise sources in the urban environment. Noise at a local level, however, would likely vary according to proximity to noise-related activities such as high-traffic roads and construction.</p> <p>The above is not a vision statement, nor does it propose solutions. This seems the case in many areas of "VISION 2050". The idea of a section on "Aesthetics", and use of inventors and innovators to solve problems, would be a solution as it historically has been. This may be best driven by government cooperation and code enforcement that offers incentives for using small business and innovators as a means to solve their problems. Government should also encourage inventors, innovators, and business of all classes to engage in international commerce by offering incentives (including contracts) and free (or no fee) access to government services and licenses (start-ups and small businesses are often very cash strapped in terms of being able to do their work; and domestic companies often must compete with overseas interests that operate within a cost, supply, and government support network which further places the domestic inventor/innovator at a disadvantage). Methods and means for further improving local competitiveness and global commerce reach should be encouraged and developed. A panel or forum for such discussions is not indicated in VISION 2050.</p>	
Hendrick Haynes	8	<p>3.1 How the Alternatives Were Developed (pp. 77-85)</p> <p>On page 77, under "ASSUMPTIONS GUIDING THE ENVIRONMENTAL REVIEW", under "Build on VISION 2040", they "make improvements that reinforce a common regional vision of greater environmental sustainability, access to prosperity, and a high quality of life.". Note that definition of "environment" can be defined to exclude relationship to the ecosystem and its relationship to nature and the earth. "Environmental Sustainability" needs to be defined.</p>	Sustainability has been added to the glossary.
Hendrick Haynes	9	<p>3.3 Transit Focused Growth Alternative (pp. 87-89) In the 3.3 "Transit Focused Growth Alternative", page 88, where "growth to occur within regional growth centers and within a quarter-mile to a half-mile from current and planned investments in high-capacity transit", how might a start-up enterprise get the needed community cooperation of low cost space and living arrangements required to "boot strap" start their enterprise, as well as find methods of subsistence? The idea of "angel financing" is generally second round financing, and "boot strap" business "start-ups" generally build up their origins through outside personal resources and "sweat equity".</p>	Comments acknowledged. Support for new, small, and local businesses have been added to the Economy and Development Patterns sections of VISION 2050.
Hendrick Haynes	10	<p>4.1.1.4 Impacts of the Transit Focused Growth Alternative</p> <p>In 4.1.1.3-4.1.1.5 "Impacts to ...." (pages 101- 104), comparisons are made relative to "Jobs-Housing Balance" and "Housing Growth by Density" with no regard to how a home is used. While their analysis may favor "apartment" type "eating-sleeping-resting" functionality, the rural type residence traditionally was organized around some commercial function. They worked and lived there, as well as raised a family. Not all types of housing and transportation styles are compatible with each other. For example, urbanites moving into traditional rural areas may choke once rarely used roads with their traffic, may harass and kill off their pets and livestock, may threaten horse or bridle trails, may disrupt horse and cattle commerce and the movements of farm vehicles, the noise from "outsider" traffic will affect game movements and farm animal production, etc. Section 4.1.2 "Cumulative Effects" does not even begin to touch on these rural subjects. Who is housed, where they are housed, and how they behave will affect the how, what, where, when, and why inside the behaviors of their neighbors. It always has.</p>	The jobs-housing balance measure was developed to understand the ratio of jobs to housing at a county and subare scale. Jobs-housing balance is a planning concept that advocates for housing and employment to be located close together.
Hendrick Haynes	11	<p>In 4.1.3 "Potential Mitigation Measures" (page 105), at bullet point 2, should add "Pursue design guidelines and design approaches, and new technology alternative design approaches, for small lot development...". Other ways of housing people should be developed besides what is currently available. Worthwhile alternatives will take time to evolve in a tried and true manner. Also, what do you do when you simply run out of room? On the final bullet point, this should be changed to "Encourage a wider range of affordable housing options for seniors, for and special needs populations, and housing that accommodates a variety of family sizes.". The plan as written here limits the range of options available to seniors, and tries to combine seniors with people with special needs. The special needs population may have behavioral problems that are incompatible with being located with seniors (indeed, may be dangerous to them). The needs and dignity of each population should be respected.</p>	The mitigation measure on affordable housing options has been updated to further separate the different groups.
Hendrick Haynes	12	<p>In Table 4.1-4 "Potential Mitigation Measures: Housing and Employment (continued)" (page 106), "Promote economic activity and employment growth that sustains diversity of family wage jobs" (9th bullet point) is something that is earned inside "Provide a supportive environment for business start-ups, small businesses, and locally owned businesses". How is the community going to help ensure the small business owner will be successful (or competitive) at both? How will the community encourage the small business start-up and/or small business owner to take risks, especially when others do not and the surrounding cultures effect is to increase the risks they would have to take? At what point do the risks become too burdensome inside the culture they wish to participate in, and in such case, what course should they take?</p>	VISION 2050's Economy section contains information and policies on these issues. The Regional Economic Strategy further examines these issues.
Hendrick Haynes	13	<p>4.1.4 Social Equity Considerations</p> <p>In Table 4.1-4 "Potential Mitigation Measures: Housing and Employment (continued)" (page 106), "Promote economic activity and employment growth that sustains diversity of family wage jobs" (9th bullet point) is something that is earned inside "Provide a supportive environment for business start-ups, small businesses, and locally owned businesses". How is the community going to help ensure the small business owner will be successful (or competitive) at both? How will the community</p>	Comment acknowledged.

Commenter	Comment Number	Comment Text	Response
		<p>encourage the small business start-up and/or small business owner to take risks, especially when others do not and the surrounding cultures effect is to increase the risks they would have to take? At what point do the risks become too burdensome inside the culture they wish to participate in, and in such case, what course should they take? Often small business is started by poor people who want to create job(s) for themselves and open a potential future when no other course seems readily open to them, and society fails to offer them even minimal protections from such courses as automobile accidents (where by Washington State Law, a small business owner may be have some offense brought upon them, and the value of their lost labor into their enterprise as a result of the accidents injuries will not be recognized because his business (in failing to yet rise to the point of profitability) has failed to yet create an equitable wage for them (remember, they are using "sweat equity" to build their business and are redirecting what wages they could otherwise pay themselves into equipment and wages to support their business and their employees). Not only that, but the offending party (and there counsel) can gain access to the small business owners business plan, books, customer lists, trade secrets, and insight into their intellectual property and openly publish it inside the court process even though Washington State has a trade secrets law. Is this fair?</p>	
Hendrick Haynes	14	<p>4.2 Land Use (pp. 107-117)</p> <p>On page 108, second bullet point "Rural Land", the nature of rural businesses is described as "such as local services, farm, livestock, food processing, or other natural resource based uses." This seems a pedestrian approach and understanding as to what a rural home based business and/or home based industry is. The guide here is that rural businesses, and especially rural home based businesses and industries, work from home and have a limited employment and buildings footprint relative to their property. These businesses may be architectural and engineering offices, law offices, product design and development companies with supportive production and warehousing functions, etc., and may have global reach client capabilities. The key is they are very limited in terms of size and operations, and they are ideal for employing a highly educated and lifestyle conscious labor pool. While "Rural Land" description(s) is fundamentally correct, the appeal of the services, talents, and products produced may go far beyond the borders of making hay bales or cleaning up a milking parlor. Sentence should read "... economic development, such as local services, farm, livestock, food processing, home based businesses or industries, or other natural resource-based uses including the design, the making, and supporting of equipment and means used in supporting the making, using, catching, or converting of same." Much rural land is carved into plots too small to make a sustainable classical farm type enterprise on them and as such has fallen into alternative uses such as home based businesses, home based industries, and residential homes with rural lifestyles.</p>	Home based businesses can be on rural land, but not all need to be on rural land. The list was intended to provide a limited number of examples of businesses that need to be located on rural land.
Hendrick Haynes	15	<p>4.9 Environmental Health (pp. 146-148)</p> <p>Recognize what makes human beings innovate and be productive, and encourage these surroundings and processes. There is a great deal of literature on this, and in examples with both in rural settings and in corporate research and development campuses. In Section 2.11.2 "Human Health", it is noted that "there is potential to exacerbate localized air quality and noise impacts, and to adversely impact environmental health (see Section 4.4 and Section 4.14 for additional details)". Impacts such as "obesity, diabetes, heart disease, and stroke mortalities" can be significantly affected by noise (and other stress causing effects), and truck and vehicle emissions, and these impacts as called out in the references of 2) above (many scientific papers representing only a very shallow sampling of the research done). See C) above. These adverse health impacts reduce productivity, drive up health care costs, reduce fertility, drive up education costs, and impair regional development. Start-up and maturing enterprise solutions would want to improve productivity and drive down health care costs, so they would leave or avoid areas that would have burdensome health care costs and lower productivity in favor of areas with reduced or negligible health care costs and improved worker productivity (which includes themselves; to do otherwise would not be competitive and put them out of business). Enterprises which save money by polluting (and drive these savings onto their bottom line) increase the cost of business and lower the odds of success of others, and can produce a negative economic load on the community far in excess of the short term gains they may receive. In reference 2) above, there is at least one technical paper on this (many available on internet).</p>	Comments acknowledged.
Hendrick Haynes	16	<p>4.12 Visual Quality (pp. 152-153)</p> <p>On page 152, 4.12 "Visual Quality". This term is too limiting. This chapter should be entitled "Aesthetics", and reach into that as it relates to human senses. Thus, it would not only be concerned with visual appeal (sight), but sounds, aromas, the feelings of air currents (etc.), and sense of freedom and networking that would be so important to a culture. Notions of reflections, both in sight and sound, would be very important; as well as how these sights, sounds, smells, pressures, and tastes favorably impresses the mind. I do not see in this document an integrated approach to improving the human experience. There is a lot of "stuff" about pushing more inside of this and that (much like packing a can). There is talk about design and engineering. There is not much talk about improving the human experience, and improving productivity, although the idea of spending more time in class rooms seems encouraged. See 2.14 VISUAL QUALITY discussion above.</p>	Comments acknowledged.
Hendrick Haynes	17	<p>4.13 Earth (pp. 153-154)</p> <p>On page 153 (4.13 "Earth"), it is noted that "None of the alternatives completely prohibit development on sites at risk for geological hazards. In addition, the region is susceptible to earthquake and volcanic disasters that would severely and adversely impact many, if not all, of the regions residents.". Does this mean the PSRC wants to ignore the hazards and build almost anything just anywhere, or does this mean sound design judgment should be made in terms of where something should be located and how it should be designed, relative to the risks involved? Will there be a requirement that the risks, and mitigations, be made as a public document beforehand so they (the public) may understand the costs to them?</p>	Geologic hazards each have different risks and mitigation needs. Local land use planning, building codes, and critical areas regulations are developed to address the risks specific to the area.
Hendrick Haynes	18	<p>4.14 Noise (pp. 154-155)</p> <p>On page 154 (4.14 "Noise"), it states "Specific impacts would be analyzed and mitigated at the project level.". As noted in 2) above, noise such as the much disliked "BACK-UP BEEPERS" on commercial vehicles and mining machinery, etc., is federally regulated and used IN ABSENCE OF someone being physically in back of a vehicle and guiding them (in short, it is a danger warning signal designed to be sharp and offensive). These alarms are inexpensive and available in a range of loudness from about 80-120 db. Some are adjustable in strength (loudness). It would be very easy to make the alarm activated by a momentary "ON" switch (has to be held on by the driver), or make the back-up alarm energized by the actual presence of something being there behind the vehicle (radar or radio field triggered, etc.).</p>	Noise mitigation measures have been added to the SEIS.

Commenter	Comment Number	Comment Text	Response
		<p>Many of the noises I now hear from the gravel mining site two (2) or three (3) miles away from me on the canyon rim are from vehicles left in place with their back-up alarms running for long periods of time, and of course other trucks and vehicles back about and add their noises in too. This doesn't have to happen at all and the fix is cheap. Other noises are created as well from generators, compressors, hydraulic pumps, rock grinders and chippers and sorters, etc., over long hours of the day and night (and also all night). On page 155 (Table 4.14-1 "Potential Mitigation Measures: Noise"), in all boxes, there is nothing about REDESIGNING, removing, and replacing THE SOURCE OF THE NOISE. In the case of the over-broadcasting alert BEEPER, it's a several minute job costing less money than what ordinarily may be paid by one person for a lunch. Why would any person owning such a vehicle knowingly and wantonly wish to make so many people irritated and suffering so? It's an international topic (GOOGLE it). See 2.16 NOISE above.</p>	
Hendrick Haynes	19	<p>Environmental Justice [<a href="https://www.psrc.org/sites/default/files/v2050-dseis-chap5.pdf">https://www.psrc.org/sites/default/files/v2050-dseis-chap5.pdf</a>] (pp. 157-178)  In terms of page 157 et seq. (5. "Environmental Justice"), this flows into the above and an in having the freedoms and ability to chart a new direction in ones (such as starting a home based business, and growing the resources and professional skills needed to serve and support ones customers). See below.</p> <p>Encourage Home Based working, Home Based Businesses, and Home Based Industries (especially in the rural areas). Decentralized production approach to certain classes of business can reduce traffic loads on roads, recentralize labor pockets, and is more efficient use of one's time. It has potential to improve productivity and family life (and the community), raise incomes, bring more international reach business into the community, improve housing opportunities (through innovation and specialized development), reduce crime, and increase the efficiency of government (by reducing costs associated with the criminal justice system and lost productivity). Education (both institutional and self education) will be improved as more time and resources may be devoted to same instead of spending time in moving slowly in traffic (and spending more time "renting" square feet of road occupying time .... which is what one does when driving as a unit of pavement has a distributed first cost and maintenance cost). In the rural community, this is what was done hundreds of years ago. Simple economics was understood. Time wasted on the road was generally time wasted away from work, unless your product(s) produced was sufficiently consolidated to make a production selling run to where you needed to trade your wares. Similarly, many rural residents have "tele-commuting", which allows them to work at home until their deliverables are completed, and then they commute to work when they have to attend critical meetings or deliver some key work. One example of this was an aerospace engineer I ran into who lived in the rocky mountain region, but whose actual work location was on the east coast. I ran into another person who controlled importation of a majority of one kind of resource coming into the United States from a home based office in his apartment located on top of a skyscraper luxury hotel in a tourist destination. He was supported in his activities by two (2) secretaries. This man was self made and started from nothing (he has since passed decades ago; his self made man story is not unique for his time). These answers come from all races, countries, and income classes from all over the world and may answer some of the demands presented in parts 5.1 to and including 5.9 below.</p> <p>Encourage alternative housing, and alternative ways to live in them. We have a large number of options within history as to how to house people, and how to provide opportunities for them. The problem is the culture and political means we have for engaging and testing these solutions. This has been brought up several times with the GMVUAC. Some members have a history of designing in this area. There is a long international history of others participations, and many websites on this. These answers come from all races, countries, and income classes from all over the world and may answer some of the demands presented in parts 5.1 to and including 5.9 below.</p> <p>5.7 Potential Mitigation Measures</p> <p>With regard to issues of "Affordable Housing" (page 176, bullet point 5 in 5.7 "Potential Mitigation Measures"), we need to develop alternative or different housing types (e.g.; be innovative) with regard to technologies and techniques that offer less of an ecological impact and less of a cost than exists today using "standard" design techniques. There is a long history in this with good progress made all over the world. It is very difficult to engage in this conversation inside the PSRC, inside King County, inside the GMVUAC, and various cities without becoming ensnared in much politics and expensive side matters when only the freedom to invent, demonstrate, and freedom to improve the experimental design(s) is (are) sought after. See 5. Environmental Justice (above).</p>	Comments acknowledged. VISION 2050 supports a variety of work and housing choices (see Economy and Housing sections).
Hendrick Haynes	20	<p>5.8 Significant Unavoidable Adverse Impacts</p> <p>In the interest of ecological and environmental justice, we should begin VISION 2050 by addressing open and notorious institutionalized levels of waste (and opportunities presented).</p> <p>One example in terms of opportunity (for this writing) has to do with SURFACE WATER MANAGEMENT. A lot of resource water is speedily channeled off and away where otherwise it could be used to enhance wildlife, agriculture, forestry, the fisheries (including aquaculture), and the public water supply (including aquifer recharge areas).</p> <p>5.9 Environmental Justice Determination</p> <p>One example in terms of opportunity (for this writing) has to do with SURFACE WATER MANAGEMENT. A lot of resource water is speedily channeled off and away where otherwise it could be used to enhance wildlife, agriculture, forestry, the fisheries (including aquaculture), and the public water supply (including aquifer recharge areas). Converting resources into useful items has no color or income barrier as long as one is resourceful. As an example, Indians are very innovative in using readily available materials in crafting alternative housing, acting as hunting and camping guides, and in hunting and fishing, which can earn considerable amounts of money on a seasonal and daily basis. Skills and materials to accomplish this are readily available, and resources may have been set aside through government access to treaty rights. A public library, and the good librarian staff, is a ready resource freely available to everyone.</p>	VISION 2050 contains updated policies on water resources, including stormwater, water reuse, and conservation (see Environment and Public Services sections).

Commenter	Comment Number	Comment Text	Response
Ian Scott	1	I am in favor of the Transit Orientated option it appears to be the best base on your analysis. Asking communities to develop a displacement prevention plan as part of the City Master Plan to reduce the risk of displacement doesn't seem that that large of an ask since your require them to create a city master plan anyway.	Comment noted. In addition to the three alternatives considered in the Draft Supplemental EIS, the Final Supplemental EIS analyzes the impacts of a Preferred Alternative that is a hybrid of the Transit Focused Growth alternative and the Stay the Course alternative. The Preferred Growth alternative, and all of the alternatives considered, are described in Chapter 3 of the Final SEIS. In addition, please see the Regional Collaboration, Development Patterns, Housing, and Economy sections in VISION 2050 for Multicounty Planning Policies related to displacement.
James Cooper	1	As climate change encroaches, our land use patterns need to comply with the facts. Transit Focused Growth is the only option that attempts to spread population and jobs growth in a way that will ensure our auto-dependence reduces in time.	Comment noted. In addition to the three alternatives considered in the Draft Supplemental EIS, the Final Supplemental EIS analyzes the impacts of a Preferred Alternative that is a hybrid of the Transit Focused Growth alternative and the Stay the Course alternative. The Preferred Growth alternative, and all of the alternatives considered, are described in Chapter 3 of the Final SEIS. Also, recognizing climate change is a key topic of interest, VISION 2050 has been updated to include a new Climate Change chapter and associated policies and actions.
James Cooper	2	Automobiles are responsible for a large chunk of GHG production in the state, putting people and jobs in places where the need is reduced is the responsible policy.	Comment noted.
Janine Graves	1	With all this growth and development what's your plan for waste? Sending it all to the cedar river landfill?! You've been "studying" it and traveling to Europe to study it... I'm sure on tax payers dollars. What's the plan? What's the strategy? I've found articles from the 70's and 80's asking the same question. One article was requests from the Issaquah School District regarding garbage being dropped in schoolyards IN THE 1970's!!!!!!	VISION 2050 includes policies to reduce waste, including recycling. Waste planning and management is conducted by local governments.
Jeannette Sumpter	1	I don't know what kind of publicity this was given, but I just learned about it today, so unfortunately I don't have time to study the proposals and make an appropriate response!	The VISION 2050 update process and environmental analysis was based on an extensive public engagement effort including comment periods, public meetings, community events, and open houses. PSRC completed outreach through surveys, social media, local news media, community organizations, local governments, and PSRC's website and email list.
Jeannette Sumpter	2	I can tell you, however, that I am adamantly opposed to the effort which is already underway, the goal of which is to get us all out of our cars and living in high rise apartments.	Comment noted. Please see VISION 2050 Multicounty Planning Policies listed under the Transportation and Housing section. Housing policies encourage providing a range of housing types and choices to meet a variety of needs throughout the region. Transportation policies encourage providing a variety of travel options.
Jeffrey Moidel	1	I would be in favor of the first 2 plan options—Stay the Course, and also Transit Focused Growth. I am adamantly opposed to changing the zoning in rural areas at this time to allow for greater growth. I think that the rural areas are important buffers that provide incalculable measure to our qualities of life for all, including the people in the surrounding urban areas. Otherwise, the Snohomish and King County rural areas will just become part of the sprawl—much like Los Angeles blends into the Valley there—it's one indistinguishable and uninspiring mess of a sprawl. There must be areas with acres of pumpkin patches and corn fields and flowers, areas with woods and native wildlife, areas where the air quality is not polluted by rush hour traffic, and areas where people can raise livestock. I do not see any plan or funds being allocated for improving SR 522 and the infrastructure around the proposed Paradise Road Apartments—and this is a disaster in the making! This is an example of exactly, precisely what should never be allowed to happen in this area. There is no infrastructure to support a complex like this, and yet that parcel was re-zoned to allow for urban growth. Why? First thing's first. Focus on infrastructure. Then bring the questions of growth back to the table.	Comment noted. In addition to the three alternatives considered in the Draft Supplemental EIS, the Final Supplemental EIS analyzes the impacts of a Preferred Alternative that is a hybrid of the Transit Focused Growth alternative and the Stay the Course alternative. The Preferred Growth alternative, and all of the alternatives considered, are described in Chapter 3 of the Final SEIS. Also, please see VISION 2050 for updated Multicounty Planning Policies under Development Patterns and Public Services for policies and actions related to preserving rural areas and infrastructure considerations to support anticipated growth.
Jennifer Lutz	1	Transit-focused growth at this point seems like the most sustainable choice given the expected growth. Having said that it does not comply with 50% (or more) reduce of CO2 and other greenhouse gases. I would like more research and attention to more renewable energy sources especially as the Transit Focused Growth would significantly increase higher density housing.	VISION 2050 contains Multicounty Planning Policies that address this topic. Recognizing climate change is a key topic of interest, VISION 2050 has been updated to include a new Climate Change chapter and associated policies and actions. Policies in the Public Services section promote renewable energy.
Jennifer Lutz	2	Solar panels on the south facing roof line should be mandatory or highly incentivized. Similarly any new development should provide infrastructure for green energy options - with projected growth. This should also be mandatory or highly incentivized for the developers.	VISION 2050's Climate Change and Public Services sections contain policies to promote renewable and alternative energy. Development codes are regulated at the local level.
Jennifer Lutz	3	Additionally green spaces and storm water management should be protected and thoughtfully managed for carbon sequestration and reduction of surface water contamination.	VISION 2050's Environment and Climate Change sections contain policies and actions on stormwater, carbon sequestration, and open space.
Jerry Meyer	1	To whom... As a downtown resident and worker I subscribed to the "Downtown Density Bill of Rights." Please see below. Urgent action is needed to prevent our neighborhood from becoming unlivable. Over the last 9 years our quality of life has steadily decreased. If new tower development continues as planned I don't know if we'll stay in Seattle (Bellevue is becoming more attractive all the time). We need MHA legislation to: Protect neighbors' reasonable access to light, air and privacy from a neighboring redevelopment.	VISION 2050 includes policies in the Environment and Development Patterns sections to avoid and mitigate development impacts and improve quality of life. Coordination with the City of Seattle, who directly regulates development downtown, is encouraged.

Commenter	Comment Number	Comment Text	Response
		<p>Require projects can't move past EDG unless their functional designs provide equal access to shared alley right-of-ways and contain adequate internal space to contain their loading and waste functions.</p> <p>Broaden representation in the Design Review process by including a representative of SDOT and a neighborhood representative to provide balance to decision-making.</p> <p>--Legislation is needed to enforce responsible design criteria on new towers downtown. Density will only succeed if it preserves a safe, functioning and healthy environment for existing and future residential neighbors and people working downtown.</p> <p>--Seattle needs density but not without limits. Nearly a dozen towers pending approval are being passed without addressing public concerns on their site-specific impacts.</p> <p>--If towers aren't designed to fit individual site conditions, existing buildings, city streets and the environment will be the losers.</p> <p>--There's only one chance to get this right before downtown Seattle is irrevocably reshaped for generations to come.</p> <p>For more information on solutions for responsible downtown density contact: DRASeattle@gmail.com</p>	
Jerry Waugh	1	<p>Downtown Density Bill of Rights</p> <p>We need MHA legislation to:</p> <p>Protect neighbors' reasonable access to light, air and privacy from a neighboring redevelopment.</p> <p>Require projects can't move past EDG unless their functional designs provide equal access to shared alley right-of-ways and contain adequate internal space to contain their loading and waste functions.</p> <p>Broaden representation in the Design Review process by including a representative of SDOT and a neighborhood representative to provide balance to decision-making.</p> <p>--Legislation is needed to enforce responsible design criteria on new towers downtown. Density will only succeed if it preserves a safe, functioning and healthy environment for existing and future residential neighbors and people working downtown.</p> <p>--Seattle needs density but not without limits. Nearly a dozen towers pending approval are being passed without addressing public concerns on their site-specific impacts.</p> <p>--If towers aren't designed to fit individual site conditions, existing buildings, city streets and the environment will be the losers.</p> <p>--There's only one chance to get this right before downtown Seattle is irrevocably reshaped for generations to come.</p>	VISION 2050 includes policies in the Environment and Development Patterns sections to avoid and mitigate development impacts and improve quality of life. Coordination with the City of Seattle, who directly regulates development downtown, is encouraged.
John Feit	1	We need to take the most aggressive, transit-oriented policies as politically feasible. We should even push those boundaries. I am inspired by lidding freeways to create more publicly owned land, as advocated by the group Lid I-5 <a href="http://www.lidi5.org">www.lidi5.org</a>	Comment noted. VISION 2050's Regional Growth Strategy, Development Patterns, and Transportation sections contain policies to support transit-oriented development.
John Niles	1	For each of the three scenarios, the modeled 2050 residential population within a half mile of all future high capacity transit stations should be stated in numerical tables.	Numerical tables showing population and employment in proximity to high-capacity transit for each of the alternatives can be found in Appendix B.
John Niles	2	For each of the three scenarios, the modeled 2050 daily transit ridership accessing each future high capacity transit station should be stated in numerical tables.	Numerical tables showing transit ridership for each of the alternatives can be found in Appendix B.
John Niles	3	For all 2050 scenarios generally, there should be a comment on the potential for deployment of high volume battery-electric VTOL aviation service in 2050 between major employment nodes, transit centers, and regional airports, along the lines of a map shown by Uber Elevate at the Amazon Radical Urban Mobility think tank conference in April 2017 attended by transportation planners from around the nation. Further information on the intra-urban aviation topic at <a href="https://www.eetimes.com/document.asp?doc_id=1334403#">https://www.eetimes.com/document.asp?doc_id=1334403#</a> and <a href="https://www.nasa.gov/uamgc">https://www.nasa.gov/uamgc</a>	Thank you for the article on autonomous air vehicles. Policies and actions in the Transportation section of VISION 2050 call for continued work to address technology and freight, including through the update of the Regional Transportation Plan.
Johnathon Davis	1	2050 is coming up quickly in terms of planning for growth locally as well as in terms of climate impact globally. Focusing on a transit oriented growth strategy is an important small step for climate and should be prioritized. This criteria should have outsized importance when making the decision. Letting people get around the region without a car is the only way we can begin to cut back on automotive emissions.	Preference for the Transit Focused Growth alternative has been acknowledged. The SEIS evaluates greenhouse gas emissions for the alternatives. Evaluation criteria and process for selecting a preferred growth alternative are described in Appendix D. Mitigation measures in the SEIS are implemented, in part, through policies in VISION 2050. VISION 2050 includes policies and actions in the Climate Change, Environment, and Transportation section to reduce greenhouse gas emission.
Johnathon Davis	2	In addition, the costs of owning a car decrease the economic stability for thousands of families in the region that don't have the means to live in a transit rich neighborhood. It would be useful to see this type of economic analysis included in the different studies. How many families with a car would reduce to 1 or 0 vehicles if they had more reliable transit and how does this affect their ability to support the local economy?	The Housing Background Paper ( <a href="https://www.psrc.org/sites/default/files/vision_2050_housing_background_paper.pdf">https://www.psrc.org/sites/default/files/vision_2050_housing_background_paper.pdf</a> ) discusses the topic of housing and transportation costs. It notes that housing and transportation costs are generally lower along the I-5 corridor and in other areas well-served by transit. The SEIS includes a measure on access to opportunity, which includes a mobility component.
Johnathon Davis	3	I didn't see it mentioned in the chart on the growth alternatives but zoning should be a large part of a transit focused growth solution. Many single family neighborhoods in Seattle have frequent transit but exclude building more dense housing that would welcome others to the neighborhood. Increasing density in these locations would reduce impacts of building all housing in dense areas on arterials where the air quality is reduced due to cars, trucks and buses.	VISION 2050 includes policies in the Regional Growth Strategy, Development Patterns, and Housing sections on compact and transit-oriented development. Zoning is an important local tool to implement these regional strategies.

Commenter	Comment Number	Comment Text	Response
Jordan Goldwarg	1	Thank you for the important work going in to planning for our region's future. In order to ensure a vibrant region for ALL, I sincerely hope that the final plan will incorporate specific, measurable goals related to racial and socio-economic equity. Otherwise, I worry that the whole region could become unaffordable for many people, or we will end up with a region increasingly segregated between wealthy (largely white) cities and towns, and poor (largely non-white) cities and towns. Thank you!	VISION 2050 has been updated to include to include additional consideration of equity (see the Regional Collaboration, Environment, Development Patterns, Housing, Economy, Transportation, and Public Services sections). A new Regional Collaboration action has been added to VISION 2050 to track the implementation of VISION 2050 through a regional monitoring program. PSRC will work with partners to develop measures on equity.
Karen Herring	1	Sammamish Washington has a myriad of Environmentally Critical Areas including lakes and tributaries that feed into Lake Sammamish where a Native Resident The Kokanee are struggling to survive. All manner of Environmental Impact must be studied, reduced whenever possible, and best choice is to eliminate it completely. Sammamish has partnered with King County, The KWG, and her own residents are participants in seeing to the environment of our city. Please respect the nature that this city enjoys and doesn't mind sharing with others. A citizen (I am a Steward for stormwater, habitat and native plants) can only do so much. Thank you.	Stewardship work is appreciated. VISION 2050 includes Multicounty Planning Policies that support environmentally critical areas and minimizes the impacts of development on the natural environment. Please see the Environment section of VISION 2050.
Kate Lunceford	1	I support the idea of bringing growth around major transit centers but cities should still be incentivized to increase density.	Comment noted. Please see VISION 2050's Regional Growth Strategy and Development Patterns sections for policies that support transit-oriented development and density.
Kate Lunceford	2	Transfer of development rights should be collected into a bank so builders in other parts of WA can use credits from Snohomish County farms. TDRs should be permitted in single-family home projects. The idea that the cost makes housing too expensive is ridiculous.	Comment noted. The Final SEIS includes mitigation measures including Transfer of Development Right programs. A policy in the Development Patterns section of VISION 2050 also encourages Transfer of Development Rights programs.
Kate Lunceford	3	Development around transportation infrastructure makes sense as long as there is adequate access to the transit centers. We need buses in neighborhoods that can get people from home to a depot so we can get away from building high-rise parking garages. I would have to walk a mile to get to a bus so I drive.	VISION 2050's Transportation section includes many policies that support improved access to transit. It also includes an action to update the Regional Transportation Plan, which will look at improvements to the transportation system, including transit.
Kate Lunceford	4	Wherever transit centers are located livable development must be designed. Multifamily housing is great but needs to include some low-income options. Plan real grocery stores, 30% tree canopy now-not in 20 years, low-impact building, walkable streets, parks, benches - you know- livable!	Comment noted.
Kathryn Keller	1	I prefer alternative two. However, we cannot escape the requirement to support complete towns with good transit access to rail and light rail for some older towns and cities where a lot of people live while we clearly need to improve complete places in areas like the Amtrak station near South Center.  What is key is jobs/housing/culture/society/life balance in towns and cities - less driving, more local transit. A long commute by any mode should not be the assumption for everyone.	Preference for the Transit Focused Growth alternative has been acknowledged. VISION 2050 has been updated to include policies on these topics.
Kathryn Keller	2	My problem with option three is that while some individuals might need to augment their family means by traveling to work elsewhere, the expectation is that a town like Fall City exists to service the farmers in the area, not new suburbanites. We cannot encourage more of the likes of North Bend's subdivisions of McMansions, where people move specifically to have a long commute AND a big house.	Comment noted.
Kathryn Keller	3	Nothing should pass without first having programs and plans that ensure that people and small businesses are not displaced to anything more than a move within the same neighborhood to a new place at same cost, are not taxed out, or are helped to build in the backyard, etc., in areas targeted for density where people already live. The big businesses need to pay their fair share for this. And, the region needs to have standards that stop office parks, strip malls and suburban McMansion subdivisions.	Comment noted. The VISION 2050 Economy section includes a policy on identifying and mitigating displacement risk for businesses.
Kevin Tisdell	1	Well I left a comment in the main page contact field. I hope you find it. I was not aware of my local meeting in Bremerton on the 19th. Not sure anyone in Kitsap was aware.	Comment noted. The VISION 2050 update process and environmental analysis was based on an extensive public engagement effort including comment periods, public meetings, community events, and open houses. PSRC completed outreach through surveys, social media, local news media, community organizations, local governments, and PSRC's website and email list.
Kevin Tisdell	2	My comment is this. We have a full model of high density in Seattle. Plain to see it has displaced generations of family. Pollution, health and environmental impacts fill the picture. We have to sprawl to the West. Small towns like Shelton, Matlock, Grizdale, all the way to, and beyond Aberdeen. Smaller businesses can thrive in small towns. Overcrowding is not an option, we all know better.	Comment noted.
Laura Klepfer	1	My Priorities: Affordable housing. Senior housing. Easy access to more rapid transit. environmental protection. Habitat preservation. Leave and plant way more trees. Protect all water. More walking friendly areas. Save farmland. Protect air quality including incentives for and recharge stations for electric cars. Preserve the architectural character of neighborhoods. DO not stretch out the urban boundary. More parks and protected open space.	Comments noted. VISION 2050 includes policies on these topics.
Lauren Anderson	1	Pro Transit Focused Growth - promoting growth near transit centers is important as it promotes walkability, live-work situations, and less car dependency. It's also better for the environment: reduction in air pollution, habitat protection, sustainable use of existing infrastructure that can support growth (roads, utilities, buildings, etc.). However, some infrastructure will need to be upgraded, which is more \$.	Preference for the Transit Focused Growth alternative has been acknowledged. VISION 2050 has been updated to include policies on these topics.
Lauren Anderson	2	TOD - Transit oriented development needs to be paired with low impact development, stormwater and erosion control/management, creation of parks and public space, and mixed-use development. "Smart" planning for parking and promoting use of public transit.	Comment noted. VISION 2050's Environment, Development Patterns, and Transportation sections include policies on these topics.

Commenter	Comment Number	Comment Text	Response
Lori Mcconnell	1	I would like to see the No change Alternatives pursues. Keep growth inside the current Urban Growth Areas. For the health of our families and communities, we need to protect our natural environment and maintain our rural, beautiful areas. It's a matter of health and sanity.	Comment noted. In addition to the three alternatives considered in the Draft Supplemental EIS, the Final Supplemental EIS analyzes the impacts of a Preferred Alternative that is a hybrid of the Transit Focused Growth alternative and the Stay the Course alternative. The Preferred Growth alternative, and all of the alternatives considered, are described in Chapter 3 of the Final SEIS.
Margaret Ivie	1	I prefer the transit based approach. Rural and unincorporated areas do not need to be urbanized when the majority of jobs are happening in the major cities. Housing and development in the major cities makes sense.	Preference for the Transit Focused Growth alternative has been acknowledged.
Margaret Ivie	2	The only reason people are flocking to the surrounding cities is because of better schools for their children and in some cases, because of housing prices. Seattle could easily pass a rent cap and start allowing more lower-income families to live there. Our state could also even out the schools by distributing property taxes from those who work in the city but choose to live outside it back to the city schools. Most people in the Maltby area who commute to Seattle would prefer to live closer to the city, but the school systems are not as good and there are not as many houses available.	Comments acknowledged.
Margaret Ivie	3	Alternately, we could put more transit systems in place and spread the growth equally out from each city. There needs to be a balance between urbanizing every piece of natural land and creating housing options for people who want to work in the city but not live there. Right now, all the overflow from Seattle seems to come to our area and it has not been planned for. Our school crowding is unmanageable; commute times are rising by 20 minutes every 6-12 months. There is constant deforestation and worse gridlocks on the road during peak times. So many people want to live here, it's become stressful and difficult to actually live here. This year alone I've seen 5 close families decide to leave for these reasons. If we do not check this growth, we will overcrowd our suburbs, the tech giants will move on to other cities, and we will be left with broken communities.	Comment noted. Regional agreement on a vision for our future is one way that PSRC contributes to changing undesirable trends and lack of coordination. Policies in VISION address many of the issues raised.
Maribeth Crandell	1	I would support the Transit Centered Growth option. It makes the most sense for many reasons. We need to rely more on public transit to reduce the impacts of climate change, help our communities move better throughout Puget Sound, provide transportation to seniors, low income and the disabled. Make our communities more livable.	Preference for the Transit Focused Growth alternative has been acknowledged. The Transportation section of VISION 2050 has many policies to promote and improve public transit.
marilyn martinetto	1	1. WATER IS THE MOST IMPORTANT NEED TO ADDRESS FIRST. Additional WATER sources will have been developed both to replace the loss of snowmelt in rivers feeding larger cities as Seattle, and for 1.8 million or more residents. That will be during a time when California with its gigantic population and therefore representation in Congress' House of Representatives, will not be demanding more of our Columbia River water. Water will continue to be a major cause of wars and migration.	Concern for water issues acknowledged. VISION 2050's Public Services section contains policies that address water supply.
marilyn martinetto	2	Also, if Washington remains a sanctuary state with welfare programs, it will be impossible to estimate future state populations.	Comment noted. Currently, VISION 2050 alternatives are consistent with the State office of Financial Management (OFM) population forecast process. Studying alternatives that are consistent with the OFM process makes VISION 2050 more useful and understandable to local governments as they apply regional guidance in developing growth targets. Also, please see additional information on accuracy of population and employment forecasts, here: <a href="https://www.psrc.org/whats-happening/blog/how-accurate-are-population-and-job-forecasts">https://www.psrc.org/whats-happening/blog/how-accurate-are-population-and-job-forecasts</a>
marilyn martinetto	3	2. TRANSPORTATION IS CRITICAL FOR SUPPORTING ADDED POPULATION. States with large populations and highways to move them, used federal money in 1950s onward when land was cheaper, and farmers were selling. Here, that option was missed. This state still allows new developments with only one main outlet to support thousands of people in cul de sacs. We know we won't go anywhere in a large natural disaster for lack of grid streets and highways to/from main interstate highways. In wealthy cities where middle class cannot afford to live, more commuters will result because more people must travel from farther away to do home and business repairs from plumbing to copy machines, and many more service workers are demanded by the wealthy as maids, nannies, yard workers. We aren't the Netherlands where workers, young and old, arrive on bicycles to walk down steps guiding their bicycle with its tires in a groove alongside, to underground bike parking for thousands. A tiny roofed vehicle might be carried in a worker's vehicle to be used to get to work of more than one mile to work. Or rented at the parking garage. Socialist dictatorships order people where to work, and where to live, so I presume Washington is not yet there. But expecting large inbound population is going to tempt such solutions.	Comments acknowledged. The Transportation section of VISION 2050 has many policies on improving the transportation system.
marilyn martinetto	4	3. AGRICULTURE. Growing food is critical. Protect farmland. But the WATER used by agriculture is usually around 80% of water used in a given state. That leads to competition between cities with the voters (who have no clue the water lettuce or cattle need to grow for harvesting). Thus there will be intense pressure to take WATER from farming. (I can see limiting crops to those consumed in the United States, because they're using our water and soil and energy. But farmers love the profits made selling to products as luxuries overseas. Worse, marijuana uses MASSIVELY more WATER than any crop. But in meantime, farmland is gold. Saudi Arabia, China, and other WATER-starved nations are buying ARABLE LAND and WATER wherever in the World, leaders are stupid enough to sell that land and water in contracts. Ethanol plants are far worse.	Comment noted. VISION 2050's Environment and Development Patterns sections contain policies to protect farmland and other resource lands.
marilyn martinetto	5	My point: Why encourage much more population, particularly population unable to support themselves AND pay the much higher taxes needed to somehow accommodate too many people in terrain that is walled in by mountains, lakes, rivers and what's left of farmland? I know the chamber of commerce types think only about GNP, and covet constant population growth. But would you rather live in China or Japan? I'd take Japan because it realized long ago it did not have the space because of its mountains. Same with Switzerland. Both specialize producing quality, with low births & immigration.	VISION 2050 alternatives recognize the charge of the state Growth Management Act to manage growth, not necessarily encourage or control growth.

Commenter	Comment Number	Comment Text	Response
Marilyn Martinetto, Marty Martinetto	1	<p>Please publish names of the donors who created or run the "non-profit" orgs. that are being given priority power to decide which applicants are given funding for transportation projects.</p> <p>Transportation construction funding is already politically biased in favor of mass transit.</p> <p>Unfortunately the funds are usually spent inside Seattle and King County. While the state government and business interests push for much more population growth, in a region limited by the Sound, Lakes and mountains, and an early, corrupt decision to run I-5 through Seattle, that lacked space for expansion, and sits on a web of geologic faults that still might awaken any of the volcanos in the Cascades created by the continued active continental and ocean plates.</p> <p>To add "Social Justice is insane and is a warning that socialist-communist ideology is at work. What other activists propagandize "Social Justice? An undefinable state for humans who differ on every trait, mental and physical. We are each a mix of traits and experiences. EQUAL OUTCOMES for humans requires repeated taking from one population to give to another based on some favored trait in direct opposition to Rule of Law under our Constitution.</p> <p>Our government was created to escape dictators and kings, whose personal whims were mercurial and erratic.</p> <p>Vision 2050 is socialist if not communist. It allows a non-elected, non-governmental set of "non-profits" to take PRIORITY in the allotment of PUBLIC FUNDS to try to force EQUAL OUTCOMES on people whose Culture rightly was less corrupt than that of Cultures so sick as to grow socialist and communist followers. All this is possible only with the weakening of our once strong, reasoning middle class who were educated in public schools before "SOCIAL JUSTICE" dictated "mainstreaming of students in classrooms." Putin could not have done a better job of destroying the main EQUAL OPPORTUNITY provider, the U.S. public school system.</p> <p>Now the goal is to force residents who learned, worked, saved and made homes in cities run by people who prioritize utilities, streets, public safety everything else to allow "social justice" however defined and regulated to decide state transportation.</p> <p>This "Social Justice" tool, removes functional, objective transportation funding and replaces with an OPINION BASED SYSTEM run by or ADVISED by people who NEED to dictate to others, and WANT to force others to think as they do, that government must do the impossible: make people have EQUAL OUTCOMES defined by those ADVISERS. That's precisely the corruption-inviting lack of rule of law that makes corrupt nations fail.</p> <p>REMOVE ALL INVOLVEMENT OF "social Justice" GROUPS. THEY CAN ADVISE, BUT CANNOT BE ALLOWED TO GOVERN. THEY WERE NOT CHOSEN BY US TO REPRESENT US, AND WE KNOW NOT WHO THEY WORK FOR OR ARE FUNDED BY.</p>	Comments acknowledged. Transportation funding decisions follow a process approved by PSRC's Transportation Policy Board and Executive Board, which are made up of elected officials from around the region. Information on PSRC's project selection process can be found at: <a href="https://www.psrc.org/our-work/funding/project-selection/fhwa-and-fta-regional-funding">https://www.psrc.org/our-work/funding/project-selection/fhwa-and-fta-regional-funding</a> .
Mark and Laurene Temple	1	<p>If only these three options are available we would vote this way:</p> <p>Option 1 – Stay the Course</p> <p>Option 2 – Transit Focused</p>	Alternative preferences have been acknowledged.
Mark and Laurene Temple	2	We believe growth should be higher in city/urban areas where public transportation can be adapted easiest to deal with that growth. Without the infrastructure that cities have, rural communities would be hard-pressed to handle denser population. We recently heard that Pierce County (our county) is in discussion to adopt a six unit per acre allowance and we honestly cannot see how our local police, fire, roads, and public transportation can handle that.	VISION 2050's Regional Growth Strategy and Development Patterns sections contain policies on focusing growth in urban areas and cities.
Mark and Laurene Temple	3	Plus, we're very concerned about the environmental issues. Here in our area, everyone is septic systems, not sewer. How can the ground handle this?	VISION 2050's Environment and Public Services sections contain policies that address protecting water resources and managing wastewater.
Mark Spitzer	1	The most responsible and responsive approach would combine "Stay the Course" and "Transit-Focused Growth".	Preference for a hybrid of Stay the Course and Transit-Focused Growth alternatives has been acknowledged.
Mark Spitzer	2	Do NOT give up open space to sprawl growth. That is totally irresponsible because once the open space is gone, it's gone forever. Develop LAND USE and TRANSPORTATION together - as was not well done in Vision 2020. We're suffering from having to build transportation on top of a built-out environment in many places (poor 1970's voter decisions); so admit it, and move on to an integrated solution. It's where we need to end up. It'll cost extra; but that's a price we have to pay for not doing things right the first time around. Let's get going!	Comments noted. VISION 2050's Regional Growth Strategy, Environment, and Development Patterns sections contain policies on focusing growth in cities and transit-served areas to protect open space and provide efficient transportation choices.
Marlice Camus	1	We would like a rezoning. We currently have 2.5 acres and cannot subdivide. Northshore is in the process of constructing an elementary school followed by a junior high adjacent to our property. We are close to the Maltby Road. Our quality of life is no longer rural or quiet. Pls consider rezoning our area so we can move on. We have lived in our house 42 years and our privacy is compromised.	Zoning is managed at the local level. Contacting the local jurisdiction is recommended.
Mary-Anne Grafton	1	I am strongly in favor of reduced fares for low-income persons. I worked for years with homeless families and found that one of the biggest risks for eviction is a car breaking down. They need the car to get to work, and pay to get it fixed, and then don't have money for rent. One of the reasons lower-income people hang onto cars is that for many trips it is less expensive to drive. For example, I live six miles away from work, twelve miles roundtrip per day. It costs less than a gallon of gas to drive, less than \$3.00. The same travel on transit costs \$5.50 per day. Making transit more accessible with lower-fare eligibility could improve housing stability, which is good for everyone in our community--a surprise benefit in addition to everything else that comes with encouraging people to get out of their cars.	Comment noted. VISION 2050's Transportation section contains policies on increasing transportation choices for people with low incomes.
Megan Kruse	1	<p>Greetings,</p> <p>In addition to the transportation and infrastructure comments submitted for Escala and myself, I'd like to make the following suggestions for inclusion in Vision 2050.</p> <p>2.5.2 Transportation System Efficiency Improvements</p> <p>Bring back the ride-free zone in the core of Seattle to encourage widespread transit use and expedite loading/unloading of buses. The linked Seattle Times piece describes the economic benefits.</p> <p><a href="https://www.seattletimes.com/opinion/forget-seattle-streetcar-restart-ride-freezone/">https://www.seattletimes.com/opinion/forget-seattle-streetcar-restart-ride-freezone/</a></p>	Comment noted. VISION 2050's Transportation section contains policies related to transportation equity and efficiency. VISION 2050 also contains policies regarding infrastructure (see Public Services section). Development standards for residential buildings are set by local jurisdictions and specific transit programs are managed by local transit providers.

Commenter	Comment Number	Comment Text	Response
		<p>5.4.5 Transportation Equity</p> <p>Support and expand transit service like the one linked below that provides easy access to Puget Sound's regional parks by city dwellers, low-income families, people without vehicles or those who want to reduce carbon emissions.</p> <p><a href="https://www.kingcounty.gov/elected/executive/constantine/news/release/2018/April/04-trailhead-direct-returns.aspx">https://www.kingcounty.gov/elected/executive/constantine/news/release/2018/April/04-trailhead-direct-returns.aspx</a></p> <p>The ride free zone idea also supports transportation equity.</p> <p>Resist congestion pricing. This disproportionately affects low-income families.</p> <p>Transportation Impact Fees borne by developers are a better way to pay for density's impacts to the transportation grid.</p> <p>Transportation Infrastructure</p> <p>Suggestion: Require strict mandatory infrastructure requirements for new urban towers. If a tower's footprint does not support all required functional design for loading and waste, do not support that it be mitigated through a Transportation Management Plan (TMP). These unenforceable documents tend to offer impossible to keep promises such only certain size vehicles will arrive at certain hours to serve a building's needs.</p> <p>TMP's are increasingly being used as a way to avoid providing sustainable but non-revenue producing design. Tower developers, both local and international, are focused on a profitable investment and many will not retain their investment post construction.</p>	
Megan Kruse	2	<p>4.7.1 Public Service and Utilities</p> <p>Concern: Stoppgap mitigations are needed for recent developments with China declining to accept Puget Sound's waste and recycling, and the King County landfill having only 10 more years of capacity. If Oregon stops taking Seattle's garbage the whole system could fail.</p> <p>Mitigation: While permanent solutions are pursued require residential towers to include trash compactors and pass periodic spot inspections to insure their recycling is acceptable for processing and won't end up in the landfill. Compactors will also help with the crush of packing material produced by ecommerce.</p> <p>Long term recycling solution: Require Seattle maintains local recycling capacity tied to the annual population growth.</p>	<p>The SEIS contains mitigation measures in the Public Services section on reducing and recycling solid waste. Mitigation measures in the SEIS are implemented, in part, through policies in VISION 2050. Policies on reducing and recycling of solid waste are contained in VISION 2050's Public Services section.</p>
Megan Kruse	3	<p>4.8.4 Social Equity</p> <p>Suggestion: Cap the number of new towers that can 'pay in lieu' of building affordable housing into their projects. Once a zone's 'pay in lieu' threshold has been met, require developers include affordable housing in their developments or build or otherwise provide affordable housing simultaneously in another location within two miles of the new development.</p> <p>Concern: Lower paid service workers are being forced out of the urban core and increasingly must commute from further away using more energy-consuming modes of transportation to accommodate split shifts or dual jobs in the new gig economy. Our urban centers should be socio-economically diverse.</p>	<p>VISION 2050 has been updated to include additional consideration of equity and affordable housing. See the following sections for affordable housing and equity related polices: Regional Collaboration, Development Patterns, Housing, Economy, Transportation, and Public Services. Specific affordable housing programs are managed through local governments.</p>
Megan Kruse	4	<p>4.9.1 Environmental Health</p> <p>"Access to open spaces provides physical and mental health benefits and contributes to a high quality of life, especially for people living in cities and urban areas (PSRC 2018j). Providing increased access to open space and green spaces promotes mental health and encourages physical activity."</p> <p>Concern: Increasing design review is considering straight zoning as the only criteria for new tower development and abandoning guidelines that might mitigate their environmental health impacts.</p> <p>The result has produced repetitive big box architecture with buildings that stretch from lot line to lot line and 500 feet high filling every cubic foot of space. This growing forest of glass and steel fortresses leaves no open space for public benefit and is systematically blocking traditional light and air corridors that provide light to the sidewalks and neighboring buildings.</p> <p>Suggestion: Enforce design guidelines be used and create incentives and requirements that new development includes open space and set backs that prevent density from transforming urban corridors and neighboring buildings into dark and claustrophobic places. Current building designs do not promote walking communities.</p>	<p>Comments noted. The SEIS and VISION 2050 have been updated to include additional consideration of public health and design. See VISION 2050's Development Patterns sections for policies related to public health and design. While design that improves quality of life is a regional policy, development codes and design guidelines are managed by local jurisdictions.</p>
Megan Kruse	5	<p>Innovation</p> <p>Suggestion: Monitor the push for autonomous cars. Ubers and Lyfts have added to urban congestion. Autonomous cars are another category of SOVs and will draw a new sector of the population who wouldn't normally drive alone.</p>	<p>A Technology Briefing Paper and a Freight Briefing Paper prepared for VISION 2050 discuss the changes in transportation technology and package delivery. Policies and actions in the Transportation section of VISION 2050 call for continued work to address technology and freight.</p>
Melody Wisdorf	1	<p>Downtown Density Bill of Rights</p> <p>We need MHA legislation to:</p> <p>Protect neighbors' reasonable access to light, air and privacy from a neighboring redevelopment.</p> <p>Require projects can't move past EDG unless their functional designs provide equal access to shared alley right-of-ways and contain adequate internal space to contain their loading and waste functions.</p> <p>Broaden representation in the Design Review process by including a representative of SDOT and a neighborhood representative to provide balance to decision-making.</p> <p>--Legislation is needed to enforce responsible design criteria on new towers downtown. Density will only succeed if it preserves a safe, functioning and healthy environment for existing and future residential neighbors and people working downtown.</p>	<p>VISION 2050 includes policies in the Environment and Development Patterns sections to avoid and mitigate development impacts and improve quality of life. Coordination with the City of Seattle, who directly regulates development downtown, is encouraged.</p>

Commenter	Comment Number	Comment Text	Response
		--Seattle needs density but not without limits. Nearly a dozen towers pending approval are being passed without addressing public concerns on their site-specific impacts. --If towers aren't designed to fit individual site conditions, existing buildings, city streets and the environment will be the losers. --There's only one chance to get this right before downtown Seattle is irrevocably reshaped for generations to come.	
Meloney Turner	1	Stay the course	Preference for the Stay the Course alternative has been acknowledged.
Michael Koznek	1	I prefer the Transit Focused Growth proposal. I am concerned about forcing low-income households farther away from transit, jobs, and services.	Preference for the Transit Focused Growth alternative has been acknowledged.
Michael Koznek	2	I would like to see more businesses where the owner lives above the shop.	Comment noted. Policies encouraging a range of housing choices are contained in VISION 2050's Housing section.
Michael Koznek	3	I want to protect open spaces, farmlands, forestlands, and wetlands.	Comment noted. VISION 2050's Environment section contains policies and actions to protect these natural resources.
Michael Koznek	4	I want to see more mixed income neighborhoods.	Comment noted. Policies supporting housing affordability are contained in VISION 2050's Housing section.
Michael Mccoy	1	Current traffic congestion, no adequate docks, alleys too narrow to allow for two way traffic, no plans for garbage containers, no consideration of other towers in adjacent blocks. This city has a history of not addressing any of this in the approvals for new towers. And we all are suffering.	VISION 2050 includes policies in the Development Patterns, Transportation, and Public Services sections to address these issues and improve quality of life. Coordination with the City of Seattle, who directly regulates development downtown, is encouraged.
Mike Todd	1	Erika: A couple of thoughts/inputs on the scoping and ensuing development of the V2050 plan. The name of the Transit Focused Growth alternative may not be the right one - and the name itself may bias or limit the extent of the work that is done to develop that plan alternative. I think that alternative is more appropriately about a "Transportation System" bias; that Transportation System indeed includes High Capacity Transit (LRT long term, and BRT in particular for parts of Snohomish County), but it needs to also look at the state highways and local arterial aspects of the systems. I believe the point is that people need to get from housing to employment to education to recreation, etc. on the transportation system, and our complete transportation infrastructure is comprised of mechanisms to move people in SOV, HOV, Transit, and accommodate walkers and bikers. If we only focus on LRT and BRT corridors but neglect the missing East-West road corridors in SW Snohomish County, for example, we will have BRT stuck on inadequate roadways alongside SOV/HOV - and our plan to focus growth around BRT will be a failure. Bottom line, I'd change the name to "Transportation System Focused" instead of "Transit Focused" to make sure we explicitly consider and balance our plan to reflect transit, cars, and pedestrians (and freight).	Comments acknowledged. All of the regional growth alternatives analyzed are reflective of the transportation system described in the Regional Transportation Plan, which includes transit, roadways, pedestrian, and other modes of transportation. The names were chosen to differentiate population and employment growth patterns.
Mike Todd	2	While it is certainly easier to make broad generalizations about the location of employment, housing, and the transportation systems that connect them, the devil can be in the details. I think that the data that SHOULD be available for this Regional Growth Strategy is more robust and informative than we have had in prior versions of RGS development; I encourage us to dig in and use it to test our generalizations. For example, it is common to say "xx% of the population in a certain area is within 1/2 mile of high capacity transit", so we plan growth targets accordingly. But I am fairly certain that measurement in the past has been distance as a crow flies, not the real distance for a walker to get to transit around other natural and man-made structures. First and last mile makes a huge difference for transit use; a trip starts when you walk out your front door and decide to get in your SOV or start your walk to transit. As an example of the data shortfall in the past, my own home shows up as easily within 1/4 mile of transit (as a crow flies), but I am more than a mile from the transit line due to a neighborhood of 70s style curved roads and cul de sacs, and a golf course. As another example, as Light Rail comes to south Snohomish County, I can picture where housing will be within 1/4 mile of LRT stations, but there is I-5 to cross. Thus, when we develop plans to put growth near High Capacity Transit, let's get data from Google Maps for walking route distances to transit stops, not simple linear distance from a residential area to a bus route drawn on a map. Maybe it is too much work to run the data at that level of granularity throughout the four county region, but I suggest we at least test the assumptions in some various locations to make sure our high level assumptions are realizable in practice.	The update of the Regional Transportation Plan will provide the opportunity to improve access to transit, as supported by policies and actions in the Transportation section of VISION 2050.
Nancy Johnson	1	Strongly favor Transit Focused Growth Will protect more rural land Will reduce CO2 the most - VERY IMPORTANT - for climate change and health Increase housing density which will be more efficient energy use	Preference for the Transit Focused Growth alternative has been acknowledged.
Nancy Johnson	2	Concern is housing/services for low-income citizens. How will this be addressed?	VISION 2050's Housing and Public Services sections contain policies and actions to promote housing affordability and supportive services.
Natalie Bicknell	1	I support a transit oriented development plan for Central Puget Sound. We need to implement strategies that prevent our beautiful region from being choked by sprawl while also providing people with more mobility choices. Not everyone is able to drive, and we need to make sure that mass transit & other mobility options are available for all of the people who need them, especially vulnerable populations.	VISION 2050's Development Patterns and Transportation sections contain policies that support transit oriented development and transportation choices.

Commenter	Comment Number	Comment Text	Response
Nina Milligan	1	My preferred alternative would be Stay the Course. My criteria for selecting this alternative are three: Many cities have already invested in significant long-range planning for the 2040 plan and there is not compelling enough argument to change at this time.	Preference for the Stay the Course alternative has been acknowledged.
Nina Milligan	2	The transit Focused Alternative is not right because it will burden communities and displace residents at too high a rate. Consider for example South Bellevue, or Bainbridge Island. Should those communities really take on more growth than Stay the Course?	Comment noted. Policies to address displacement are contained in VISION 2050's Development Patterns, Housing, and Economy sections.
Nina Milligan	3	The Reset Urban Growth is contrary to the GMA and reverses the work jurisdictions have invested in all these years to make compact cities, cities compact enough to sustain goods and services in walkable or transit-able neighborhoods. Just a superficial read of the comparison chart says this alternative has adverse effects in almost every category.	Comment noted.
Pam Kepford	1	Transit-focused growth, please! More transit! Better transit!	Preference for the Transit Focused Growth alternative has been acknowledged.
Pam Kepford	2	Last mile solutions - Shuttles? Bikeshares.	First and last-mile connections are considered as potential mitigation measures in the Transportation section of the Final SEIS. These types of solutions are supported by policies in the Transportation section of VISION 2050.
Peggy Shepard	1	Hi Rod and PSRC, The email below is from our community development director which has an attachment from Mayor Larson to PSRC regarding growth goals. He has sent other correspondence to outside agencies representing his perspective as that of the city, including King County's comprehensive plan. The attached letter submitted to PSRC was not voted on by city council nor was there a survey of residents. My perception is that residents disagree with Mayor Larson's position. Peggy Shepard Snoqualmie City Council Member	Comment noted.
Peggy Shepard	1	I am concerned about allowing growth goals to be interpreted as minimums, they should be maximum.	The Regional Growth Strategy chapter in VISION 2050 provides additional discussion of the target setting process and how targets relate to the Regional Growth Strategy.
Peggy Shepard	2	I'm concerned about the following statement included in the Vision 2050 Draft Supplemental Environmental Impact Statement: "The Water Supply Forum notes in the 2012 Regional Water Supply Update that water supply throughout the region is sufficient for current and future use." Without acknowledging that the Water Supply Forum also states: "Shortages are possible beyond 2050 under certain circumstances: If demographic growth projections became greater than forecasted"	Thank you for your comment. A caveat was added to the water supply statement in Section 2.9.2 to reflect future uncertainty if population growth is greater than anticipated.
Peggy Shepard	3	I'm concerned that WSDOT is using PSRC's projections for growth (minimums or maximums?) to design improvements to the I-90 / 18 intersection.	Comment noted.
Peter Nigh	1	I support the transit oriented growth approach. We should put the majority of the growth in the dense urban centers.	Preference for the Transit Focused Growth alternative has been acknowledged.
Rick Krochalis	1	I am providing comments on the Draft SEIS for the Vision 2050 plan and following up on my scoping comments I provided in March 2018 regarding the possible impact of autonomous vehicles on the region's mobility and land use plans. My scoping comments requested that PSRC study and model "the impact of new disruptive transportation technologies, data collection and management and specifically autonomous vehicles on current transportation planning practices. In the time horizon of the 2050 plan, there is a strong likelihood that a majority of vehicle traveling on our roadways will be operating with a high degree of automation." I noticed that the Vision 2050 Scoping Report stated: "VISION 2050 should address/evaluate emerging transportation technologies and account for anticipated impacts of these technologies on various aspects. These include understanding the impacts on growth, housing, travel demand, roadway capacity, safety, infrastructure design, land use, regional mobility, and transportation planning practices. PSRC should consider scenario based analyses to analyze emerging technologies and commenters also noted that it is essential to understand the impacts of emerging technologies on the movement of both people and freight."	Comments noted. The Transportation section of the SEIS and a Technology Briefing Paper prepared for VISION 2050 discuss changes in transportation technology. Policies and actions in the Transportation section of VISION 2050 call for continued work to address technology.
Rick Krochalis	2	However, when I reviewed the Draft SEIS, it did not appear to me that there were any significant descriptions of the impact of new transportation technologies, nor analysis of possible land use implications as I mentioned in my letter last year. In fact, Table 4.3-1, Comparisons of Key Regional Travel Measures, projected more than a doubling of transit riders from the 2014 baseline year and only forecast a 2-5% variation in transit ridership from the three alternatives studied. Further, this Table also projects a reduction in Single Occupant Vehicles (SOV) from the current 71% baseline in 2014 to a range of 62-64 % in the three alternatives. It appears that any variation in travel demand from disruptive technologies were carried across all the alternatives, thus not providing policy makers with any choices to respond to unexpected significant drops in transit usage or congestion from increased SOV usage from autonomous vehicles. I understand from PSRC staff that there may be a separate stand-alone report that discusses impacts from technology, although that would not have the visibility to the public or the influence on policy makers that modeling different alternative futures would produce.  When I review what other regions are studying, namely Boston and Chicago, I see a willingness to evaluate different assumptions on the impact of disruptive technologies in order to explore a range of solutions that could accommodate shifts in travel behavior that may not assume scenarios like PSRC forecasts such as a doubling of transit ridership in the 2050 time horizon.	Thank you for sharing resources on automated vehicles. The update of the Regional Transportation Plan will provide the opportunity to further study emerging transportation technologies, as supported by VISION 2050 transportation policies and actions.

Commenter	Comment Number	Comment Text	Response
		<p>For instance, "Reshaping Urban Mobility with Autonomous Vehicles Lessons from the City of Boston states on page 4 <a href="http://www3.weforum.org/docs/WEF_Reshaping_Urban_Mobility_with_Autonomous_Vehicles_2018.pdf">http://www3.weforum.org/docs/WEF_Reshaping_Urban_Mobility_with_Autonomous_Vehicles_2018.pdf</a></p> <p>"Our analysis predicts a clear shift to mobility-on-demand (for both autonomous and traditional vehicles), which will account for nearly 30% of all trips in the Greater Boston area and 40% of trips within city limits in the future. Driving this shift are the cost-competitive nature of robo-taxis and robo-shuttles – especially on shorter trips – and the added convenience and comfort compared with mass transit.</p> <p>In suburban and other areas outside the city proper, our analysis found that mobility-on-demand will mainly replace personal-car usage. In urban areas, it will replace the use of both personal cars and mass transit, to equal degrees, with the shift creating a risk of increased congestion. Policy-makers must assess and address the potential challenge and identify the right policy levers to influence this transition"</p> <p>Further this report goes on to say on Page 10:</p> <p>"Our analysis indicates that mass-transit ridership will decline significantly in urban areas due to the cost-competitive nature of autonomous ride-sharing services that provide door-to-door convenience and a guaranteed seat. Mobility-on-demand will account or more than 40% of trips in urban areas, with an equal defection rate from personal car and mass transit (14 percentage points each) "</p> <p>The City of Chicago recently completed the work of a task force with a report entitled, "Road Map for the Future of Transportation and Mobility in Chicago" which stated on page 40:</p> <p><a href="https://www.chicago.gov/content/dam/city/depts/mayor/PDFs/21755_37_AF_MobilityReport.pdf">https://www.chicago.gov/content/dam/city/depts/mayor/PDFs/21755_37_AF_MobilityReport.pdf</a></p> <p>Connected and Autonomous Vehicles (CAVs or AVs) are an exciting transformational technology that offers the opportunity for the City to increase safety on its roads, improve traffic flow, increase accessibility and reliability, and provide an engine for economic expansion by freeing up numerous hours of lost productivity each year. **Conversely, if not carefully managed, the technology could also result in increased vehicle-miles traveled and increased sprawl, cause more riders to forgo public transit options, and exacerbate existing equity issues, including through lost jobs and unequal access.</p> <p>**</p> <p>I reaffirm from my letter last year that "there are certainly many unanswered questions on the cost, timing and implications of autonomous vehicles. That fact does not preclude analyzing in new alternative(s), how deployment of autonomous vehicles could:</p> <ul style="list-style-type: none"> <li>-Either cause a significant reduction in use of public transportation or alternatively, support the increased efficiency and effectiveness of mass transportation investments for major high capacity routes between the region's urban centers</li> <li>-Extend mobility options for rural and lower density communities by offering demand response connections to high frequency transit routes</li> <li>-Replace lower performing transit routes with demand response shared access vehicles where transit is not cost effective</li> <li>-Offer new transportation finance options by updating the traditional operating models of paratransit, carpooling, park and ride lots, vanpools, and Transportation Network Companies (TNC)</li> <li>-Adversely affect equitable access to affordable transportation by prioritizing market based mobility services</li> <li>-Create demand for road lanes designed exclusively for use of autonomous vehicles"</li> </ul> <p>Thank you for the opportunity to comment.</p> <p>Sincerely, Rick Krochalis, AICP</p>	
Robbie Adams	1	I strongly support pursuing the Transit Focused Growth alternative for VISION 2050. Climate change and housing affordability remain the greatest challenges our region faces. Transit-oriented development, increasing density, increasing walk-ability, investing in bike infrastructure, building "missing middle" housing, and decreasing the occurrence of solo automobile commute trips are key to mitigating these challenges.	Preference for the Transit Focused Growth alternative has been acknowledged. The topics mentioned are addressed by the SEIS and VISION 2050 policies and actions.
Robbie Adams	2	Transportation is the largest contribute to climate change emissions in Washington state. Housing population growth near job and transit centers reduces trip times and the need for driving, thereby reducing emissions.	VISION 2050's Climate Change, Environment, and Transportation sections address reducing emissions through coordinating land use and transportation.
Robbie Adams	3	Additionally, an urban and transit centered growth strategy will protect our wilderness from environmental degradation due to sprawl and development.	Concur. VISION 2050's Regional Growth Strategy, Environment, and Development Patterns sections contain policies to protect open space and resource lands.
Robbie Adams	4	An additional transit strategy to consider is the possibility of the development of high-speed rail being considered through the Cascadia Coordinator (Salem, Or to Vancouver BC). This innovation will further connect our greater region economically and socially, and possible replace carbon emitting air travel with cleaner rail.	Comment noted. As supported by VISION 2050 transportation policies, high speed rail may be further addressed in the next update to the Regional Transportation Plan.
Robert Dinse	1	Transit based doesn't work because transit tries to skim the cream. But the reality is people work night shifts, weekends, often live in places not dense enough for transit to be economical and we DON'T WANT to be stuck in high density ghettos.	Alternative preference (not Transit Focused Growth) acknowledged.
Robert Larsen	1	<p>As we in the planning profession work to accommodate growth, particularly during a time when population growth is likely to accelerate, we need to step back and make sure we are doing more than "just" following the modified dictates of the Growth Management Act.</p> <p>Specifically, an important question for those of you setting long range policy guidance regarding limits to growth and milestones we can set now that will help determine when fundamental changes is needed. This is more that just building for ever more density, going "up," forcing people to make hard transportation choices,</p>	Comments acknowledged. VISION 2050's Environment and Public Services sections contains policies to protect water quality and provide adequate water supply.

Commenter	Comment Number	Comment Text	Response
		<p>turning our back on single family home owners who have aspired and worked for that goal for themselves and their children. Beyond those topical points we have bigger issues.</p> <p>The first is long term demand for and availability of water. Next there's the seemingly intractable issue of medications, more all the time, being flushed into our precious, sensitive waterways, and finally the unfortunate effects of acidification on marine life.</p> <p>We are located on the edge one of the world's special, sensitive places. It draws people here. We have water, a strong economy, fading but still somewhat friendly people.</p>	
Robert Larsen	2	<p>As growth pressure keeps building, let's think about how to spread that growth out, particularly south, east and some north along our main transportation corridors. Please do that before we give up and push into the sky. We don't want our kids growth up on apartment balconies.</p>	Comment acknowledged.
Robert Larsen	3	<p>We will need a more robust water supply. That discussion should start now. A breakthrough on meds in sewer water is needed. Is there an answer in sight? If not we need to set limits. And finally, let's develop incentives for electric transportation.</p> <p>Thank you, I hope this message is useful,</p> <p>Robert Larsen Retired City Planner Current Chair, Snohomish County Planning Commission</p>	See response above on water. The Environment, Climate Change, and Transportation sections include policies to promote electrification of the vehicle fleet.
Robert Palon	1	I highly support the Transit Focused growth plan option. As a long time area resident, I believe we have to manage growth to match available transportation capacity to maintain our quality of life.	Preference for the Transit Focused Growth alternative has been acknowledged.
Sally Lider	1	Transit-focused growth is obviously the best alternative, although I don't think it really goes far enough toward addressing carbon dioxide emissions.	Preference for the Transit Focused Growth alternative has been acknowledged. Recognizing climate change is a key topic of interest, VISION 2050 has been updated to include a new stand-alone Climate Change section and associated policies and actions.
Sally Lider	2	Why would you even consider the option of "Reset Urban Growth?" All that does is increase the problem of moving people around to their jobs and homes, and makes all the environmental impacts on rural parts of the county much worse. We need to keep some trees! We need clean streams! Shouldn't we be making plans that make jobs and schools more accessible by bicycle and transit?	Comment noted.
Sally Lider	3	I don't entirely understand why "Stay the Course" has more of an increase in accessible jobs than "Transit-Focused."	Transit Focused Growth has more jobs accessible by transit, walking, and biking than Stay the Course.
Sally Lider	4	Lastly, who will enforce these guidelines, and what good will all this planning do if money isn't taken out of politics!	Comment noted. County and local governments are responsible for incorporating the Regional Growth Strategy and multicounty planning policies into their comprehensive plans.
Sally Montgomery	1	By 2050 the people who moved to Issaquah before 2015 will be gone, the animals will be gone, the trees will be gone. The water will have to come from other polluted waters, the crap being built will be the slums in the valley and Rowleys tall buildings and rape of the rest of the valley will cause air pollution to where we have to call on Beijing for help. Started under mayor Friesinger and continued under Mayor Butler. Those who loved this town and worked for it as volunteers will be gone after paying accelerating taxes for your brain farts. Traffic of course, you are going to fix. ?? Schools will still be overcrowded and education will be what it was prior to 1960. Becoming a regional hub without citizen input was a criminal and tasteless sign of arrogance. Nothing like a valley. Egress can't happen either. Good luck with your pipedreams.	Comments noted.
Sally Van Over	1	<p>I spoke with Ted Inkley, one of the people that helped write the initiative requiring counties to plan for future growth. We both looked at the summary you emailed me and agreed that the transit focused growth plan would be our choice for the future.</p> <p>I have watched a lot of wasted money involved in Seattle's approach to transit transition and hope I won't watch piecemeal, expensive solutions to the regional planning. I understand that these are costly infrastructure projects but I do think the public is watching and waste of tax payer dollars only leads to distrust of the system that oversees it.</p> <p>Thank you for sending me the summary.</p>	Preference for the Transit Focused Growth alternative has been acknowledged.
Scott Marshall	1	<p>This does not go far enough, we are staring down the barrel of a mass extinction, one that humanity will not survive unless we reach 100% renewable energy within 5 years.</p> <p>You are only thinking in terms of money, with human lives a distant afterthought. If fossil fuel companies are not swiftly nationalized and dismantled, people will die.</p>	Recognizing climate change and renewable energy are key topics of interest, VISION 2050 has been updated to include a new stand-alone Climate Change section and associated policies and actions and also has retained policies in the Public Services section regarding renewable energy.
Sharon Kay Ricketts	1	Thank you for having an open house meeting in Bothell.	Comment noted. Public participation is a key component of regional planning.
Sharon Kay Ricketts	2	Core cities - I'm assuming you mean port cities? No way can Bremerton compare in population to such as Renton, Kent, Bellevue, or Federal Way. If your basic assumption is "port" for a core city, be careful on Everett for there is quite a competition on its harbor as to what kind of development.	Bellevue, Bremerton, Everett, Seattle, and Tacoma are Metropolitan Cities, defined as central cities that serve as civic, cultural, economic, and transportation hubs for the county and/or region. Renton and Kent are Core Cities, defined as major cities and

Commenter	Comment Number	Comment Text	Response
			urban areas with transit and designated regional growth centers. Ports are important facilities, but not part of the definition of regional geographies.
Sharon Kay Ricketts	3	As you happily plan for a huge population increases, you might consider a most interesting rat experiment: Rats were placed in a room with all the food, water, and nesting material that they would want. The only restriction was space. As they industriously multiplied, the social system broke down - no nest building and the mothers gave birth to their babies by dropping them on the floor as they were running around. Also, I believe it was in Washington DC where low income housing was by one huge building next to another. The social situation was so bad that many of the buildings had to be torn down to open up space.	Comment noted.
Sharon Kay Ricketts	4	Think hard on what you plan and for heaven's sake don't look to the Corp of Engineers as a mentor. They certainly are a prime example of poor planning.	Comment acknowledged.
Sharon Kay Ricketts	5	A criticism - the maps on display were poorly labeled. Main routes (I5, Hwy 527, and 99) plus cities (Lynnwood, Bothell) should have been identified.	Map comment noted.
Sharon Kay Ricketts	6	Also lots of noise for comments but not one hint of an address.	PSRC's address, as well as other ways to comment, were provided on open house handouts and the VISION 2050 website.
Sharon Kay Ricketts	7	PS A far out idea: Do you think 3D printing will destroy shipping/warehousing like Amazon is now doing to retail?	This topic is not addressed directly in VISION 2050. It could be considered in future updates to the Regional Economic Strategy.
Stephan Petryczka	1	Hello, thank you for all the work that was put into this draft SEIS. I strongly encourage PSRC to drive the benefits of the transit-focused urban form in its reporting and communications, despite what seem like only slight long-term advantages (as measured by pollution, congestion, etc.). It feels like Seattle has built a lot of great momentum to move away from its sprawling, LA-like land use policies - hopefully more efficient regional planning can continue to guide the city into the future, despite widespread car dependency and NIMBY proclivities.	Preference for the Transit Focused Growth alternative has been acknowledged.
Steven Morris	1	Growth absolutely needs to be near transportation. There is no way that roads, alone, can handle the anticipated growth.	Comment acknowledged.
Steven Morris	2	Upzone everything within walking distance of the Sound Transit light rail stations. Upzone, to a slightly lesser degree, the areas adjacent to the Bus Rapid Transit routes. Eliminate single-family zoning.	VISION 2050's Development Patterns and Housing sections contain policies that encourage transit-supportive densities. Zoning designations are managed at the local level.
Theresa Barker	1	I am writing to express my support for option two, "Transit-Focused Growth." I am very concerned about the need for thoughtful and intentional growth decisions in this region. From a climate-change perspective, growth needs to support small businesses and important services being within easy transit or walkable distances in residential areas, which will reduce carbon emissions. People shouldn't have to drive to the supermarket or the dry cleaner or the clothing shop to purchase items for themselves or for their families.	Preference for the Transit Focused Growth alternative has been acknowledged. Recognizing climate change is a key topic of interest, VISION 2050 has been updated to include a new stand-alone Climate Change section and associated policies and actions.
Theresa Barker	2	I am also concerned about social equity issues in growth, and maintaining affordable housing. From a social equity perspective, focusing growth of transit and of development together in close-in, high-density areas provides better alternative to growth than displacing existing residents, especially lower-income and people of color. People will use transit when it is quick and frequent, and if they can access the services they need, including child care and grocery shopping.	Concur. VISION 2050 has been updated to include additional consideration of equity. See the following sections for equity related polices: Regional Collaboration, Environment, Development Patterns, Housing, Economy, Transportation, and Public Services.
Tim Harris	1	The "transit focused" option makes the most sense for the region overall, however, it runs counter to human nature when it comes to cities like Carnation. As workforces at Amazon, Facebook, Google, and Microsoft get older and decide to start families, they will start looking for less dense and less urban locations to live -- the proverbial white picket fence. This will cause increasing pressure on locations like Carnation as home values increase, property taxes increase, and existing populations get displaced by these phenomenon. The purposeful disinvestment of King County in infrastructure for locations like Carnation will lead to traffic and environmental damage along the 202, 203 corridors, and the destruction of "rural living" for current residents. While it makes sense for PSRC and King County to encourage concentration of commuters around transit hubs, not everyone wants to live in a dense neighborhood. It will be imperative for King County to expand transit options to Carnation, Duvall, Fall City, Monroe, etc. to mitigate increased congestion. There will need to be either a) assistance for low/fixed income residents in Cities/Towns to prevent displacement as property values increase, or b) economic disincentives to distort the existing market fundamentals that will incentivize affluent tech workers from driving up property values in cities and towns.  "Transit focused planning" is great so long as transit is available to the entire region. People with means will naturally want the ability to purchase lower density and higher privacy for themselves. High density apartment living and public transit can't just be the answer for "the have nots".	Comments acknowledged. VISION 2050's Transportation and Housing sections contain policies that address improving transit and providing housing choices.

