November 18, 2019

Paul Inghram, AICP  
Director of Growth Management  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, Washington 98104

SUBJECT: SUPPLEMENTAL COMMENTS REGARDING SNOHOMISH COUNTY RURAL POPULATION ALLOCATION

Dear Mr. Inghram:

The City of Mill Creek (City) is aware that the Puget Sound Regional Council (PSRC) Growth Management Policy Board (GMPB) has been meeting to evaluate the public comments and other potential revisions to prepare a recommendation on the Vision 2050 Plan for consideration by the Executive Board. Please be aware that the City appreciates the hard work of the Board on this important task; however, the City has concerns on two of the revisions that have been proposed for Snohomish County to the GMPB.

The City understands that, on November 6, 2019, the GMPB was considering what are known as Level 1 changes to Vision 2050 that impact Snohomish County. Specifically, Proposal F-1 would revise the rural population growth allocation from 6% to 3%, and Proposal F-2 would revise the rural population growth allocation from 6% to 2%. We understand that Proposal F-1 was withdrawn and is no longer being considered; however, we also understand that Proposal F-2 was tabled only temporarily to allow time for discussions between representatives of Snohomish County and Seattle to revise the proposal in a manner acceptable to the two parties.

At its November 12, 2019 regular meeting, the Mill Creek City Council discussed the proposed change in the Snohomish County rural population allocation. The consensus of the Council was that the proposed revisions to Snohomish County’s rural population allocation as contained in both proposals (F-1 and F-2) were not realistic or achievable and the proposals were inconsistent with the recommendations on this issue by Snohomish County and all of its cities as stated in Snohomish County Tomorrow’s (SCT) formal comment letter to PSRC dated September 12, 2019. A copy of this letter highlighting the language relative to the rural population growth allocation is enclosed. For these reasons, the City of Mill Creek is strongly opposed to both Proposal F-1 and Proposal F-2.
On behalf of the Mill Creek City Council, please forward the City’s comments regarding Proposals F-1 and F-2 to the appropriate members of the GMPB and PSRC staff prior to the November 21, 2019 GMPB meeting, so that the board members are aware of the City’s position on this important matter.

Respectfully,

Pam Pruitt
Mayor

Enclosure

cc: Mill Creek City Council
    City Manager
    Director of Public Works and Development Services
    Terry Ryan, Snohomish County Council
September 12, 2019

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

SUBJECT: Snohomish County Tomorrow Comments on the July 19, 2019 Draft VISION 2050 Plan

Dear Mr. Inghram,

Thank you for the opportunity to comment on the July 19, 2019 draft VISION 2050 plan. First and foremost, Snohomish County Tomorrow (SCT) acknowledges the effort and work that has gone into developing the region’s framework for future growth. We appreciate all of those who were involved in creating this plan for considering and implementing many of our comments on past phases of this project.

SCT supports the inclusion of the following items in VISION 2050 and suggests additional enhancements as indicated:

- **Transit Focused Growth** – SCT supports the selection of the modified transit focused growth alternative, and would like to express gratitude to PSRC for considering existing conditions when establishing the modified population allocation for Snohomish County. Attached to this letter is additional data and analysis to support the allocation for urban unincorporated and rural areas in Snohomish County.

- **Timing of Growth** – SCT supports the language included on page 43, which identifies potential difficulties in aligning growth targets for some areas where extension of the high-capacity transit system is not scheduled until the latter portions of the 30-year planning period. To ensure additional consideration of this issue, SCT recommends modifying RGS-Action-3, as follows, to call for more analysis of this timing challenge for local jurisdictions:

  Growth Targets: PSRC, together with its member jurisdictions, will provide guidance and participate with countywide processes that set or modify local housing and employment targets. This effort will include a rationale for the timing of regional growth strategy implementation that includes interim-year growth amounts in relation to anticipated
completion of regional transit investments and corresponding market responses, PSRC will also provide guidance on growth targets for designated regional centers and improving jobs-housing balance, and coordinate with member jurisdictions regarding buildable lands reporting.

- **Flexibility in Countywide Target Setting Process** — In our April 29, 2019 letter, SCT requested that VISION 2050 recognize economic fundamentals and realistic timelines for implementation of growth distribution shifts. As such, SCT requested that flexibility be provided to local jurisdictions to design a land use element that adequately responds to the regional growth strategy (RGS), while allowing the region to adapt to unforeseen shifts in the regional economy and timing of urban infrastructure investments. MPP-RGS-3 addresses this concern by providing flexibility in establishing and modifying the growth targets identified in countywide planning policies. SCT supports the inclusion of this policy, and recommends the following minor modifications to add clarity and consistency:

  MPP-RGS-3: Provide flexibility in establishing and modifying countywide growth targets within countywide planning policies, provided growth targets support the Regional Growth Strategy.

SCT further requests that VISION 2050 include UGA boundary flexibility to allow for changing population distribution, taking into consideration logical service and natural boundaries.

VISION 2050 should also recognize that market factors and consumer choice are primary drivers of population distribution. While SCT’s recommended VISION 2050 relies on a transit focused growth alternative, local flexibility and authority must be maintained in order to respond to and anticipate actual growth patterns.

- **Moderate Density Housing** — SCT recommended that a preferred regional growth strategy focused around high-capacity transit should allow jurisdictions to encourage development of moderate density housing. The discussion on page 93 and identification of moderate density housing in MPP-H-9 are both supported by SCT. In particular, we are pleased to see H-Action-1 and H-Action-2, which identify the need for a Regional Housing Strategy to support the 2023-2024 comprehensive plan updates.

- **Displacement** — There is concern across the region and in Snohomish County about the potential displacement of people of color, low income individuals, and other at risk populations due to redevelopment and investment in high-capacity transit. SCT addressed this concern in our April 29, 2019 letter and is pleased to see the focus on this issue throughout VISION 2050. Specifically, SCT supports the focus on displacement in the Regional Equity Strategy in RC-Action-3. A tool kit containing best practices will be of particular value in assisting local jurisdictions address potential displacement.

- **Annexation** — In the past, SCT and many Snohomish County cities have expressed concern regarding the difficulty of implementing portions of the regional plan due to barriers to annexation. SCT supports the addition of DP-Action-6, directing PSRC to have discussions with the state legislature to communicate necessary changes to state law to ease the annexation process.

In addition to the items outlined above, SCT has identified other topics that warrant additional comment and a few recommended plan changes and additions. Some of these items build on recommendations provided in past correspondence from SCT.
Transit Focused Growth

As mentioned above, SCT is appreciative that the recommended population allocation for Snohomish County was included in the draft VISION 2050 plan. The following data and analysis, along with the attachment on page 7 of this letter, support the modified population allocation for Snohomish County as a part of the RGS. This is meant to build upon the information provided to PSRC in past phases of plan development.

Figure 1 of the attachment shows historic rural population growth shares dating back to 1982. Rural growth share data show that between 1982-92, approximately 21% of Snohomish County's population growth occurred in the rural areas. By 2015, the county's rural growth share had decreased to 10%. As such, the rural growth share in Snohomish County has seen an overall downward trend since the adoption of GMA. Implementation of the proposed RGS, which allocates 6% of population growth to the rural areas, will work to continue that trend.

The growth allocation for the rural and urban unincorporated areas of Snohomish County reflect the existing conditions and provide a realistic and achievable growth distribution goal for Snohomish County. Current conditions show that, even without factoring in growth from additional rural subdivisions, there are enough existing and vested vacant lots in the rural areas to accommodate 22,836 people, or about 5.4% of 424,000 population growth allocated to Snohomish County. Further, counting vested lots in currently proposed developments in the urban unincorporated areas results in the potential for 9,000 people, which represents half of the draft preferred alternative growth assignment of 18,000 people, or 4% of the county's population growth to 2050. Tables 1 and 2 of the Attachment provide the underlying data. Based on all of these factors, SCT strongly supports the growth strategy reflected in VISION 2050, which allocates 4% population growth to the urban unincorporated geographies and 6% population growth to the rural areas in Snohomish County.

Further, because the Draft Preferred alternative directs a large portion of growth to compact, walkable communities in close proximity to transit, preliminary review completed by PSRC indicates that it has most of the benefits of the original Transit Focused Growth alternative. The Draft Preferred alternative also performs significantly better, with fewer environmental impacts, than the Stay the Course and Reset Urban Growth alternatives. While some indicators show minimally worse outcomes than the original Transit Focused Growth alternative, it is SCT's understanding that the outcomes are much more closely aligned with Transit Focused Growth alternative than the other alternatives.

Finally, SCT recommends that the fifth bullet point on page 23 be updated to better reflect the Draft Preferred alternative which assigns significant levels of growth to both incorporated and unincorporated areas within the new High-Capacity Transit Communities regional geography, as follows:

- Within urban growth areas, focuses growth in cities and in other areas with high-capacity transit service.

Jobs/Housing Balance

In SCT's letter dated April 29, 2019, support was expressed for shifting 2% or more of King County's employment growth to Snohomish County. While this reallocation of future employment growth will

---

1 Slide 15 of the "Multicounty Planning Policies and Regional Growth Strategy" presentation given to the GMPB work session on June 13, 2019.
help to improve the jobs/housing balance, help to reduce VMT and greenhouse gas emissions, and provide other benefits, SCT wants to ensure that some tangible policy and/or actions are put into place to make this goal achievable. Because employees travel across jurisdictional boundaries regularly for work, it is important that a shift in employment allocation is addressed not only through local actions, but also through regional activities, policies, incentives, and programs.

In particular, regional coordination, programming, and incentives will be required to achieve the employment allocations identified in VISION 2050. In response, SCT believes that it is appropriate to add additional action or actions, which identify the region's role in achieving the desired allocation of new jobs. For example, SCT recommends that an action is included in the economy chapter which identifies the role of PSRC in achieving the desired job allocations.

School Siting
School siting is a topic of concern for rapidly growing communities throughout the country. As growth continues in the urban portions of Snohomish County, there is increased need to site new schools throughout the urban area. School districts in Snohomish County have expressed concerns about being able to locate these schools within UGAs. School siting is a complex, multi-faceted process which is impacted by state standards, the availability of land, local building and zoning codes, land use plans, and other factors. Additionally, the siting of new schools can cause significant impact to growth plans, the provision of services, infrastructure investments, and many other aspects of local and regional planning.

The draft VISION 2050 plan does not propose changes to regional policy for school sitting in Snohomish County. With that said, SCT's interpretation of the draft VISION 2050 is that MPP-PS-26 (relating to the siting of schools that serve the urban populations) does not conflict with the existing Countywide Planning Policies for Snohomish County (CPP), and does not necessitate an update of school siting policies in the CPPs.

However, due to these complex issues, SCT believes that local jurisdictions would benefit from the addition of actions to VISION 2050 which will help facilitate school siting in urban growth areas. As such, SCT recommends that the following two actions be added to VISION 2050:

- **Update School Siting Standards**: PSRC will initiate and support discussions with the Office of the Superintendent of Public Instruction to facilitate updates that modernize school siting standards, especially those related to site area requirements. Updates should work to align school siting standards with the goals of the Growth Management Act and facilitate school districts' ability to better meet urban capacity needs.

- **Regional Support for School Siting Best Practices**: PSRC will research and develop guidance on innovative methods to update regulations and local plans to develop a regional approach to school siting and to assist local jurisdictions and school districts in siting new schools in urbanized areas.

Coordinated Transportation Planning
VISION 2050 calls for coordination between land use and transportation planning, prioritizing transit oriented development with increased densities around high-capacity transit and billions of dollars in infrastructure investments. In order to optimize these complex systems locally and regionally, it is important that coordination occurs amongst all levels of transportation planning. To address this, SCT
recommends that an action be added to VISION 2050, which calls for coordination between PSRC and the Washington State Department of Transportation (WSDOT) to ensure that the state transportation plan adequately and comprehensively serves the region's high-capacity transportation system and projected population growth.

Changing Technology
New and changing technologies will continue to have an effect on all aspects of land use, housing, and transportation planning. The effects of changing technologies on transportation and changing mobility are adequately addressed in T-Action-2. But, because the role of future technologies are currently unknown, it would be beneficial for PSRC to serve as a resource to assist local decision making by conducting research and analysis on all aspects of technological changes. As such, SCT recommends that the following action be added, which assigns this role to PSRC:

Changing Technology: PSRC will conduct research and analysis on the potential impacts from emerging technologies which impact housing, land use, job distribution, or other applicable topics. PSRC will serve as a resource to assist local jurisdictions in preparing for these changes.

Recognize Multiple Policy Objectives
Some of the primary goals of VISION 2050 appear to be contrary to each other, and because of that, it is vital that care is taken to ensure these goals are appropriately balanced. Specifically, strengthening and changing environmental regulations may affect the ability of local jurisdictions to accommodate allocated population growth. In response, SCT recommends that the following action be added to VISION 2050:

Balancing Multiple Policy Objectives: PSRC, in collaboration with member jurisdictions, will monitor the effects of changing environmental regulations on growth capacity. In circumstances where environmental and other regulations result in jurisdictions not being able to accommodate allocated growth, PSRC will research, analyze, and develop regional and local options to maintain harmony between policy objectives.

Reservation Lands and Coordination with Tribes
As requested by SCT in our April 29, 2019 letter, the draft plan clarifies the role of Tribal Lands in regional and local planning and acknowledges that the regional growth strategy does not assign population and employment to Tribal Lands. However, the depiction of Tribal Lands in Snohomish County on the various RGS maps is shown in different and conflicting ways:

Figure 5 - Regional Geographies, page 29:
- The entire Tulalip Reservation is shown as Tribal Land. However, much of the Reservation includes fee simple land owned by non-tribal members which should accommodate part of the county's rural growth allocation under the RGS.
- Should also show the federally recognized boundary of the Stillaguamish and the Sauk-Suiattle Reservations.

Figure 13 - Rural Areas, page 37:
- Shows the entire Tulalip Reservation as part of the rural area, which would indicate that the RGS does in fact assign population and employment growth to the entire Reservation.
Figure 16 – Tribal Lands, page 42:

- Similar to Figure 5, the entire Tulalip Reservation is shown as Tribal Land, and thus not allocated growth under the RGS. Fee simple land owned by non-tribal members should instead be excluded from this map of Tribal Lands.

These map conflicts need to be resolved in the final plan so that only Tribal Lands are shown (excluding fee simple lands owned by non-tribal members), and it is clear which areas of the region are included in the RGS growth assignments. Snohomish County Planning and Development Services has up-to-date map information in GIS that can be used by PSRC to establish current boundaries for Tribal Lands in Snohomish County.

In addition, SCT would like to acknowledge that transportation investments could be better coordinated between local jurisdictions and Tribes. As such, SCT recommends that language addressing transportation investment coordination, modeled off language in the regional centers framework about improving access to military installations, be added to the plan.

Thank you again for the opportunity to provide feedback on the July 19, 2019 draft of VISION 2050. Snohomish County Tomorrow is grateful to have this opportunity and is pleased to see the positive reception to past correspondence. If you have any questions about any of these comments please do not hesitate to contact us.

Sincerely,

Nate Nehring, Co-Chair
SCT Steering Committee

Liam Olsen, Co-Chair
SCT Steering Committee

Dave Somers, Vice-Chair
SCT Steering Committee

Barbara Tolbert, Vice Chair
SCT Steering Committee

CC: SCT Steering and Planning Advisory Committees
    Barb Mock, Director, Snohomish County Planning and Development Services
    Lacey Harper, Snohomish County Executive Chief of Staff
    Josh Brown, Executive Director, PSRC
Figure 1. Urban vs Rural Share of Past Population Growth – Snohomish County

Table 1. Rural Development Capacity – Snohomish County

<table>
<thead>
<tr>
<th>Source: July 3, 2019 memo from Paul Inghram to GMPB, Packet Pg. 19. Data provided by Snohomish County PDS. Notes: Existing vacant lot count only includes the number of lots greater than 20,000 square feet in size; Resulting population is based on 2.8 multiplier applied to total existing and preliminary vacant lots.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Number of Existing Vacant Lots</td>
</tr>
<tr>
<td>Preliminary Lots in Vested Formal Plat Applications</td>
</tr>
<tr>
<td>Total Existing + Preliminary Vacant Lots</td>
</tr>
<tr>
<td>Resulting Population (based on total number of vacant lots)</td>
</tr>
<tr>
<td>Transit Focused Growth Alternative</td>
</tr>
<tr>
<td>Reset Urban Growth Alternative</td>
</tr>
<tr>
<td>Requested Rural Growth Share</td>
</tr>
<tr>
<td>Draft Preferred Alternative</td>
</tr>
</tbody>
</table>

Table 2. Urban Unincorporated Population – Snohomish County

<table>
<thead>
<tr>
<th>Source: July 3, 2019 memo from Paul Inghram to GMPB, Packet Pg. 16. Data provided by Snohomish County PDS.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population growth based on existing, “pipeline” developments</td>
</tr>
<tr>
<td>2014 Buildable Lands capacity (population)</td>
</tr>
<tr>
<td>Transit Focused Growth alternative</td>
</tr>
<tr>
<td>Reset Urban Growth alternative</td>
</tr>
<tr>
<td>SCT-requested UUGA growth share</td>
</tr>
<tr>
<td>Draft Preferred Alternative</td>
</tr>
</tbody>
</table>