Comment Letters on Draft VISION 2050 Plan

The Puget Sound Regional Council sought public input on the Draft VISION 2050 Plan from July 19 through September 16, 2019. Background information on the project and public comment period is available on the [project webpage](#).

The comment letters are organized by commenter affiliation: Agencies and Organizations, Cities and Counties, Individuals, and Tribal Nations.

<table>
<thead>
<tr>
<th>City and County Letters</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bainbridge Island</td>
<td>C-2</td>
</tr>
<tr>
<td>Bellevue</td>
<td>C-8</td>
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<td>Bonney Lake</td>
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September 16, 2019

Puget Sound Regional Council
1011 Western Ave # 500
Seattle, WA 98104

RE: Vision 2050 Plan

Dear Puget Sound Regional Council:

Please accept the following comments from the Bainbridge Island City Council regarding the draft Vision 2050 Plan.

I. Sustainability
Vision 2050 articulates over a dozen “desired outcomes” pertaining to equity, the economy, housing, and more. While these outcomes regarding our regional planning are all important, the plan’s desired outcomes regarding restoration and protection of our natural environmental, and climate change, have profound implications for all of the outcomes. Both Vision 2040 and draft Vision 2050 include a commitment to restoring, protecting, and enhancing our natural environment. We support that commitment whole-heartedly and request an additional policy to measure how well we are doing as stewards of our natural environment: a commitment to scientific data and analysis. What is the current health of the greater Puget Sound ecosystem and what is the natural carrying capacity of our region?

Data and analysis regarding the state of our natural environment
The basis for scientific data and analysis regarding the state of our natural environment is the fact that all ecosystems have a finite carrying capacity beyond which they are degraded. On Bainbridge Island, we recognize this in our approved comprehensive plan. The following is from the Land Use Element of our Comprehensive Plan, and we ask that PSRC incorporate the basic concepts below into Vision 2050:

GOAL LU-2
This Comprehensive Plan recognizes and affirms that as an Island, the city has natural constraints based on the carrying capacity of its natural systems. The plan strives to establish a development pattern that is consistent with the Goals of the community and compatible with the Island’s natural systems.
Policy LU2.1

Recognizing that the carrying capacity of the Island is not known, the citizens of Bainbridge Island should strive to conserve and protect its natural systems within the parameters of existing data. Revisions to the Plan should be made as new information becomes available.

The carrying capacity of Bainbridge Island is determined by many factors including the supply of limited resources (particularly water), changes in patterns of consumption and technological advances. This Plan acknowledges that with current information, the carrying capacity of the Island is unknown. During the timeframe of this Plan, additional information on the carrying capacity of the Island should be developed.

The plan takes a balanced and responsible approach to future development. As our understanding of the Island’s capacity changes, the recommendations of this Plan should be reconsidered to ensure they continue to represent a responsible path for the long-range future of the Island.

II. Climate Change

We applaud PSRC’s work to date to incorporate an overall growth strategy and strong policies in Vision 2050 aimed at reducing future greenhouse gas emissions. A couple of suggestions we hope you will seriously consider moving forward:

1. Please adopt hard targets for greenhouse gas emissions reductions to provide clear benchmarks for measuring progress. At the minimum, consider adopting the targets for greenhouse gas emissions identified by the Puget Sound Clean Air Agency.

2. Apply a climate lens to all comprehensive plans, sub area plans, and transportation funding requests reviewed and approved by PSRC. Do proposed plans contain policies and measures that will reduce greenhouse gas (GHG) emissions, or do they encourage choices and behavior that increases GHG emissions? Same for all transportation project funding requests.

3. Evaluate the four-part greenhouse gas strategy every two years to measure its effectiveness and make changes as needed. The four-part greenhouse gas strategy includes: 1) land use; 2) transportation fees; 3) providing transportation choices; and 4) emerging technology, such as electrification.

4. Equity: Our efforts to mitigate and adapt to climate change should give equal consideration to all of our region’s communities, whether geographic or ethnic.

5. PSRC data and expertise for local jurisdictions: as part of elevating the importance of, and our connection to, PSRC, consider creating a tool kit to help local jurisdictions create policies and implement plans for reducing GHG emissions.

6. Smart land use and population growth: Along with new and creative ways to use and re-use land for housing, industry, transportation, etc., let’s acknowledge the impact that increased population has upon our overall GHG emissions.

7. Minimize rural growth: Growth in rural areas adds to car miles driven and is counter to reducing our GHG emissions. Support local TDR, transferring of development rights, programs as one tool for minimizing rural development.
8. **Keep geographies consistent**: Our regional plan should require that we all use the same terminology for the various geographies. A high capacity transit center, for example, should mean the same thing in all four counties.

9. We support policies encouraging **transit-oriented**, walkable, **urban villages** in suburban areas though redevelopment, mixed use zoning and complete street networks.

10. **Additional housing** for our population, and likely climate refugees, should be built in areas where people have access to jobs and services via transit, by foot, or through safe active mobility infrastructure.

11. **Transportation concurrency as a tool for reducing GHG emissions**: To help shape the future of our infrastructure and help guide where development occurs, we support policies supporting the use of traffic concurrency as a tool to require new development to be built where adequate transportation facilities are located. In addition, we support the implementation of **Levels of Service for nonmotorized transportation** as a way to encourage the construction of nonmotorized facilities.

12. **Green Building Codes**: Please incorporate policies into Vision 2050 that encourage local jurisdictions to adopt green building codes. On Bainbridge Island, we will soon be working on a green building code to require and incentivize such things as: 1) systems that capture rain water and re-use gray water; 2) photovoltaic systems on new commercial and public buildings; 3) requirements for new residential construction to include “solar ready” roofs; and 4) overall consideration of the environment in design, construction, and operation.

### III. Restoration of Puget Sound

There are three basic causes for the degradation of the Puget Sound marine ecosystem: 1) diminished water quality; 2) climate change; and 3) degradation of our shorelines from development. With that in mind, we urge you to incorporate the following goals and policies into Vision 2050:

1. Policies encouraging the **upgrade of our sewage treatment facilities**: The region’s sewage treatment facilities are deficient in regards to removing nitrates and “emerging chemicals of concern.” We cannot restore Puget Sound with our existing populations, much less an additional 1.8 million, unless we upgrade our sewage and storm water facilities.

2. Policies and reviews requiring **reductions in polluted stormwater**: All plans and projects before PSRC should be subjected to another lens: a stormwater lens. Each proposed plan and transportation project should show how it provides the highest level of stormwater treatment. Consider policies that discourage or deny funding for projects that include an increase impervious surfaces.

3. **Climate change mitigation**: Puget Sound, as we all now, is being adversely impacted by changing weather and ocean acidification.

4. **Brownfields and grayfields**: encourage redevelopment and clean-up of legacy polluted industrial and commercial sites.

5. **Protection of near-shore environments**: Consider policies that would encourage protection of near-shore marine environments along Puget Sound from inappropriate development.
6. **Sustainable use of groundwater:** Pumping of groundwater impacts water levels in streams, lakes, and wetlands. Include policies that encourage the sustainable use of groundwater resources for people and the natural environment.

IV. **Equity and displacement:**

1. **Include intergenerational equity:** We support an equity lens on everything we do related to age, ethnicity, economic status, etc. We also encourage PSRC to include intergenerational equity as part of that mix. How will our plan affect our people generations from now? Will they inherit a healthy region from us?

2. **Anti-displacement tool kit:** Develop a PSRC anti-displacement tool kit of strategies and policies that can be shared with local jurisdictions to minimize displacement. This may include local preference programs for new subsidized and affordable housing.

3. **Help create effective TDR programs:** Also, create a template tool kit for member jurisdictions to create effective TDR programs to allow those owning underdeveloped properties in the region’s rural areas to sell development rights, reduce their property taxes, and better afford to stay on their properties. This will also provide a way to reduce development in the region’s rural areas by transferring density to urban areas close to transit and infrastructure.

V. **Affordable Housing**

The following is from the Guiding Principles of the Bainbridge Island Comprehensive Plan:

**Guiding Principle #3**  
Foster diversity with a holistic approach to meeting the needs of the Island and the human needs of its residents consistent with the stewardship of our finite environmental resources.

Housing the region’s population without degrading our natural environment is one of our biggest challenges. Some ideas that we support consideration of:

1. **Small, market rate, housing units:** Include policies that encourage the siting of small market rate housing near centers with ready access to public transportation and nonmotorized facilities.

2. **Nonmotorized tiny house villages:** Consider policies that would encourage nonmotorized tiny house villages, or some variation of this, located near appropriate infrastructure. This could provide an affordable choice for those wanting to live a very low impact lifestyle.

3. **Community land trusts:** Consider ways PSRC, through Vision 2050, or its legislative agenda, can encourage support for community land trusts. This model promotes affordability by creating properties where residents own the housing units and lease the property they are located on. In addition, the housing units are deed restricted in regards to resale in order to remain affordable in perpetuity.

4. **State-wide rent controls:** Consider adding to a legislative agenda a request to the State Legislature that they follow the lead of neighboring Oregon and pass some form of rent control.
VI. The real value of our open space and our natural environment
The region’s open spaces and natural environment are worth billions of dollars to the region. They provide real benefits to our well-being and to our sense of place. It’s all too easy to take that value for granted or to underestimate it. We propose the following:

1. An inventory of our open space and natural environmental assets: PSRC would not be starting from scratch in providing such an inventory as part of Vision 2050 as Earth Economics has already provided much of this work.
2. Highlight this immense value to the region in 2050: Language in the introduction to 2050 could highlight the enormous value of our open spaces and natural environment.
3. Support the acceleration of open space protection and creation by local governments.
4. Encourage counties and cities to align land use, new infrastructure, and comprehensive plan policies with goals and recommendations identified in the Regional Open Space Conservation Plan.
5. PSRC should regularly measure the impacts of Vision 2050 implementation against the open space goals and recommendations.

VII. PSRC’s “Levers” for Promoting the Implementation of Vision 2050
Discussed at the September 5, 2019 Growth Management Policy Board was the question of how PSRC enforces the policies in its regional plans. Looking at it that way, PSRC is limited to withholding certification of comprehensive plans, subarea plans, and to denying funding requests for transportation projects. One commenter during the hearing on Vision 2050 told the Board that PSRC needs to inspire the region with a vision that “nourishes the imagination” and leaves us willing to venture outside of our comfort zone to embrace the changes we need to make. With that in mind we recommend the following:

1. Be realistic in talking about growth: The draft of Vision 2050, kind of talks about its desired outcomes as if they are just going to happen. In reality, we don’t know if it’s even possible to add another 1.8 million people to the region, providing all of us with housing and jobs, while also reducing our greenhouse gas emissions and restoring Puget Sound. That may not be possible. PSRC could add new dimension to Vision 2050 by being realistic about this challenge and the uncertainties we face. That would resonate with the public and underscore what is at stake as we move forward as a region.

VIII. The importance of our local tribes
Please include more information about our local tribes in Vision 2050, hopefully informed by them.

IX. Bring our member jurisdictions together: Members of the public in PSRC’s various member jurisdictions don’t generally understand the significance of THEIR comprehensive plans much less PSRC’s regional plan. Let’s explore ways, perhaps through Vision 2050 policies and narratives, to encourage more interaction between our member jurisdictions with the goal of elevating the importance of regional planning. One idea would be to create a watershed map that illustrates how connected we are that includes sources of pollution. On that map all of the
sewage treatment plants on Puget Sound could be identified, along with their relative abilities to treat sewage.

In closing we would like to thank PSRC staff, and all of the representatives from member jurisdictions, for your hard work. We appreciate your professionalism and genuine commitment to the future of the Puget Sound region.

Sincerely,

Kol Medina                              Ron Peltier
Mayor                                Councilmember, At Large
September 16, 2019

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

RE: VISION 2050 Draft Plan Comments

Dear Mr. Brown:

The City of Bellevue supports the preferred Regional Growth Strategy as outlined in the VISION 2050 Draft Plan, supporting vibrant urban centers, providing opportunities for housing and jobs near transit hubs, and protecting our Puget Sound environment. This letter represents the City of Bellevue’s staff comments on the Draft Plan for PSRC’s consideration.

**Introduction and Overview**

- *In the Vision section:* Please consider using photos more representative of the region’s demographics. It appears there is only one person of color amongst the 70-75 people identifiable on the *A Dynamic Region* and *The Puget Sound Regional Council* photo/intro pages (pp. ix-x).

- *Page 3, top:* ...Vision 2050 is a call for personal and institutional action to address long-term regional challenges, including racial and social inequality, climate change, housing affordability, and imbalance of jobs and housing around the region.

This statement suggests that our region requires a better distribution of housing and jobs growth. The preferred alternative does not improve the jobs-housing balance, and King County would benefit from additional housing growth.

Housing affordability is becoming a crisis that needs to be addressed. Our region is one of the most expensive housing markets in the country. Across the region, 30% of homeowners and 45% of renters are cost burdened or severely cost burdened. For African American and Hispanic households, over 50% of renters are cost burdened. Rent increases are clearly associated with rises in homelessness. (Cost burden statistics from Vision 2050 Housing Background Paper, p. 34.)

- *Page 4, top:* “VISION 2050 calls for cities and counties to support the building of more diverse housing types, especially near transit, services, and jobs.” How does the preferred alternative address the need for additional capacity for new, moderate density housing that addresses the imbalance of housing demand and supply?
• Page 5, middle. The draft Plan suggests that the jobs-housing imbalance will be addressed through job creation. “Job creation in all of the region’s communities will result in a better balance of jobs and housing.” While the region can work toward encouraging job creation in areas with an oversupply of housing, the region needs to ensure adequate housing is supplied in areas that have witnessed high job growth in the past.

• Page 7, top: Support for the Regional Growth Strategy Goal of distributing 65% of population growth and 75% job growth to “region’s growth centers and high capacity transit station areas.” The following policies in the Plan could better echo this goal:
  
  - Page 19: MPP-RC-6 Give funding priority – both for transportation infrastructure and for economic development – to support designated regional growth centers, and manufacturing/industrial centers, and high capacity transit station areas, consistent with the regional vision. Regional funds are prioritized to regional centers.

  - Page 19: MPP-RC-8 Recognize and give regional funding priority to transportation facilities, infrastructure, and services that explicitly advance the development of housing in designated regional growth centers and high capacity transit station areas…”

  - Page 44: MPP-RGS-7 Attract 65% of residential growth and 75% of region’s employment growth to the region’s growth centers and high-capacity transit station areas…”

• Page 26, Housing, Displacement, and Jobs-Housing Balance—first paragraph: This section states that the success of the Regional Growth Strategy is planning for a “balanced distribution of affordable housing choices and jobs.” Distribution is important but, as noted previously, also critical is increased capacity for new, moderate density housing that addresses the imbalance of housing demand and supply.

• Page 26, Housing, Displacement, and Jobs-Housing Balance—second paragraph: The draft Plan underplays the impact the preferred alternative will have on jobs-housing balance “Across the region, the strategy generally plans for improved jobs-housing balance compared to today.”

Climate Change

• Page 60: Instead of mentioning a suspended Clean Air Rule summarize the recently passed Clean Energy Transformation Act, which requires utilities transition to 100% clean energy by 2045. This underscores the need to focus on reducing greenhouse gas emissions from the transportation sector.

• MPP-CC-5 Pursue the development of energy management technology as part of meeting the region’s energy needs. Not clear what “energy management technology” means; should be defined.
Development Patterns

- Pages 69-89: Support the Opportunity Mapping and Displacement Risk tools and the recommendations for their use.

- While the Annexation and Incorporation policies at MPP-DP-26, 27 and 28 effectively convey intent, the narrative on Page 79 in the second paragraph could be clarified to be supportive of local decision-making on annexation. Suggest striking the third and fourth sentences of the second paragraph.

- Seek clarification of the following statement: “It would be consistent with the spirit of the Regional Growth Strategy for the region’s Metropolitan Cities to accommodate an even larger share of forecast regional growth in the countywide growth targets, while aiming for a better balance of jobs and housing.”

- Proposed policies that discuss implementation at the local level should be understood to include the need for local circumstances and policies to be considered (e.g. historic preservation, landmarks, view protection).

- What’s the meaning of the policy “Protect industrial lands from encroachment by incompatible uses and development on adjacent land.” Is it for industrial-zoned lands exclusively? Or also for industrial uses in redeveloping TOD areas?

Housing

- Page 91, Housing Goal: The Housing Goal includes “The region...expands its housing stock...” This ideal should resonate throughout the Plan.

- Page 92, bottom: The last sentence of the page should include the word “owner” as it seems to describe Fig 27 “Ownership Housing Stock by Housing Type, Central Puget Sound Region.” While the region has a changing population and a wide range of housing needs, the vast majority of owner homes are larger single-family homes.

- Page 97: MPP-H-8 Promote the development and preservation of long-term affordable housing options in walking distance to transit by implementing zoning, regulations, and incentives. This policy could also include the following, “contributing funding, donating land, and partnering with non-profit housing providers.”

Economy

- What specifically can be done to foster living-wage job opportunities throughout the region? This desire is stated many times in the document. There seems to be huge demand in the metropolitan cities that drops significantly in outlying cities/towns.
Transportation

- Strengthen the section that describes transportation innovations. The current language describes transportation innovations as "disruptive," which is a negative term. Vehicles that are automated, connected, electric, and shared are capable of transforming the region's transportation system within the near future. These advances may make transportation safer, smarter, cleaner, faster, more affordable, and more accessible. The PSRC should seek to maximize the benefit of these technologies through the following actions:
  
  o Convene an advanced transportation committee to support the deployment of smart mobility technologies and their integration into the region's transportation system. The committee should include public and private sector members to coordinate research and to make recommendations on regional actions.
  o Convene a committee to expand the region's electric vehicle (EV) charging options. This group should include utility providers, park and ride owners and operators, transit agencies, and EV charging companies.
  o Provide information about EV adoption rates to the owners and operators of public and private parking facilities, including park and rides, where people are parked for extended periods.

- A transportation policy should be added to VISION 2050, adopting the Vision Zero goal of zero deaths or serious injuries. The Vision Zero movement is founded on the belief that death and injury on city streets is unacceptable and preventable. Bellevue's Resolution 9035 and Ordinance 6334 endorse the Vision Zero movement, incorporating it into the City's Comprehensive Plan. The Washington State Department of Transportation and the Washington State Transportation Commission worked together to create the Washington State Strategic Highway Safety Plan, which established a goal of zero deaths or serious injuries by 2030 on state roads.

- The Transportation chapter's second paragraph addresses the region's investments in transit infrastructure. It should include a description of the region's investment in high-occupancy toll lanes that support bus rapid transit.

- Page 112: Suggest the following changes: "the future value of the fuel tax -- the primary source of funding for transportation investments -- is limited. Advances in vehicle fuel economy, increasing construction costs, and erosion of purchasing power due to inflation have demonstrated the need to find other ways to pay for transportation investments."

- Page 115: The phrase "improving the jobs-housing balance" should be explained more clearly.

- Page 115: The term "reasonable" should be clarified. How are "reasonable travel times" defined?

- MPP-T-1: Should be changed to, "Maintain and operate transportation systems to provide safe, efficient, and reliable movement of people and goods, and to provide services" or a similar change. The current language is confusing.

- MPP-T-13: Should be changed to, "Increase the proportion of trips made by transportation modes that are alternatives to driving alone, especially to and within centers and along corridors"
connecting centers, by ensuring availability of reliable and comprehensive transit and non-motorized options.” MPP-T-16: Should be changed to, “Design and manage local street patterns for walking, bicycling, and transit use to enhance communities, connectivity, and physical activity.”

- MPP-T-17: The word “reliable” is unclear. How can bicycle and pedestrian connections be unreliable? Is this intended to mean “navigable” or “intuitive”?

Appendix 1 – Discussion of Population Projections and Jobs/Housing Balance

A Visionary Jobs-Housing Balance

- As the draft plan states, “Vision 2050 recognizes that “business as usual” will not be enough. As a result, Vision 2050 is a call for personal and institutional action to address long-term regional challenges, including, racial and social inequality, climate change, housing affordability and imbalance of jobs and housing around the region.” Yet, the methodology for developing the Regional Growth Strategy allocates population to counties based on the status quo.

  o Population growth allocations to counties are based on OFM’s projections derived from past trends, not on the region’s vision for the future.
  o Baseline job growth allocations to counties are derived by converting population growth to job growth using present day population to job ratios at the county level.
  o Vision 2050’s Regional Growth Strategy makes no adjustments to OFM’s population allocations to address the current housing deficit in King County.

These methodological details are important because they will determine whether the allocation reflects the vision to change past trends. The DSEIS states the approach toward developing the baseline job growth allocation “assumes the current distributional pattern of population and jobs across the region today will carry into the future.”1 Is this counter to the stated vision in the draft Plan? As can be seen in Table 1 below, the growth of jobs in King County is projected to outpace population growth (the bolded numbers). This will likely exacerbate the existing jobs-housing imbalance, and impact housing costs, commute times, GHG emissions, and equitable access to opportunity.

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* Does not include military employment


2 Calculations based on ibid.


4 Carol Naito. 2019. Personal Communication based on the PSRC 2018 Macroeconomic Forecast


Thank you for consideration of these City of Bellevue staff comments on the VISION 2050 Draft Plan. We are available to further discuss or clarify as needed.

Sincerely,

Mac Cummins, AICP
Director, Community Development Department
City of Bellevue
RESOLUTION NO. 2773

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF BONNEY LAKE, PIERCE COUNTY, WASHINGTON RELATED TO COMMENTS ON VISION 2050

WHEREAS, the Puget Sound Regional Council (PSRC) is in the process of preparing VISION 2050, which is a strategy for how and where the central Puget Sound region should grow; and

WHEREAS, the Regional Growth Strategy (RGS), which is at the center of VISION 2050, is PSRC’s envisioned plan for the physical development pattern for the Puget Sound region; and

WHEREAS, while the City recognizes the benefits and supports a growth pattern that emphasizes compact development, increase transit ridership, and supports the Regional Centers Framework, the City cannot acquiesce its authority or responsibility under the Growth Management Act (GMA) to plan for the actual growth anticipated and the type of development envisioned by City; and

WHEREAS, recognizing that the GMA envisions a “bottoms up” approach to planning and not a “top down” approach, the RGS selected must be one which can be reasonably achieved by all jurisdictions;

NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF BONNEY LAKE, WASHINGTON DOES HEREBY RESOLVE AS FOLLOWS:

The City Council of the City of Bonney Lake concurs with the comments provided in the letter prepared by the City Administration, included as Exhibit A, and supports the submittal of the letter to PSRC.

PASSED by the City Council and approved by the Mayor this 10th day of September, 2019.

[Signature]
Neil Johnson, Jr., Mayor

AUTHENTICATED:

[Signature]
Harwood T. Edvalson, City Clerk

APPROVED AS TO FORM:

[Signature]
Kathleen Haggard, City Attorney
City of Bonney Lake, Washington
City Council Agenda Bill (AB)

Department/Staff Contact:
Public Services Department
Jason Sullivan – Planning & Building Supervisor

Meeting/Workshop Date:
September 10, 2019

Agenda Bill Number:
AB19-110

Agenda Item Type:
Resolution

Ordinance/Resolution Number:
2773

Sponsor:

Agenda Subject: VISION 2050 Comments

Full Title/Motion: A Resolution of the City Council of the City of Bonney Lake, Pierce County, Washington related to comments on VISION 2050.

Administrative Recommendation: Approve

Background Summary: At the August 27, 2019 City Council meeting, City staff briefed the City Council on VISION 2050. During the presentation, staff discuss a number of concerns, which the staff believed should be convey to PSRC. City Administration has prepared a comment letter related to those concerns and a resolution demonstrating the City Council’s support of the submittal of the comment letter to PSRC. A copy of the letter being drafted by the Pierce County Regional Council has also been provided as an attachment. The purpose of the meeting is to discuss the comment letters with the City Council.

Attachments: Resolution 2773, Draft VISION 2050 Comment Letter, Staff Briefing Memo, PCRC VISION 2050 Comment Letter, VISION 2050 Scoping Comment Letter (3/16/18), and Resolution 2739 (DSEIS Comment Letter 4/17/19)

BUDGET INFORMATION

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Budget Explanation:

COMMITTEE, BOARD & COMMISSION REVIEW

Council Committee Review: Date: Approvals:
Chair/Councilmember
Councilmember
Councilmember

Forward to: Consent Agenda: ☐ Yes ☐ No

Commission/Board Review:
Hearing Examiner Review:

COUNCIL ACTION

Workshop Date(s): April 9, 2019 and September 3, 2019
Public Hearing Date(s):
Meeting Date(s): April 17, 2019 and August 21, 2019
Tabled to Date:

APPROVALS

Director: Ryan Johnstone, P.E.
Mayor:
Date Reviewed by City Attorney: (if applicable):
September 10, 2019

Puget Sound Regional Council
Attn: VISION 2050 Comment
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

RE: VISION 2050

To Whom It May Concern:

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 a 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.”

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.).

While the City believes that VISION 2050 has taken steps to balance the bottom up approach envisioned in the GMA and the desire for a growth pattern that achieves the larger regional objectives, additional clarification is needed as to how the growth targets will be utilized during the next comprehensive plan update and what is meant by “guidance” in the context of the regional growth strategy.

The Guidance for Aligning Growth Targets section states that “PSRC will update the Plan Review Manual to provide additional guidance on planning for growth targets prior to [C]omprehensive [P]lan updates.” PSRC’s guidance for setting growth targets should recognize that:

- unique sub-regional realities exist (e.g., geographical and environmental constraints, transportation access, external growth pressures such as a military installation);
- local growth trends differ from one jurisdiction and/or sub-region to another; and
• relative distribution of growth to individual cities and unincorporated places will be determined through countywide target-setting, taking into account local circumstances.

Also under Guidance for Aligning Growth Targets, draft V2050 continues in part:

In its review of comprehensive plans for certification, PSRC reviews consistency of the plan with adopted countywide growth targets. . . . If adjustments to countywide growth targets are needed, they should be coordinated through the countywide process.

The guidance provided should allow for some flexibility in whether a jurisdiction has met adopted targets at the time of certification, recognizing the unique differences through the region, and actual growth that are beyond a jurisdiction’s control. Additionally, the guidance should be consistent with Central Puget Sound Growth Management Hearings Board’s Final Decision and Order in West Seattle Defense Fund v. City of Seattle:

“... allowing a city to plan for even more growth than has been allocated to it by the county bolsters the Act’s first two planning goals by encouraging that city to accept in its comprehensive plan as much growth as it determines it can adequately accommodate ...”.

While the City will work with PSRC and the member jurisdictions to achieve the objectives of VISION 2050, the City must emphasize that portions of VISION 2050 are guidance and not mandatory of certification. PSRC staff has repeatedly stated in various forums that VISION 2050 is intended to provide guidance and only that PSRC only certifies the transportation related elements of a comprehensive plan. Therefore, the City would request the following implementation measures be changed from “will” to “should” to denote that it is indeed guidance:

En-Action-4

Local Open Space Planning: Counties and cities will should work to address open space conservation and access needs as identified in the Regional Open Space Conservation Plan in the next periodic update to comprehensive plans.

CC-Action-3

Emission Reduction: Cities and counties will should incorporate emission reduction policies and activities in their comprehensive planning. Elements include supporting the adopted
Regional Growth Strategy, providing multimodal transportation choices, and encouraging a transition to a cleaner transportation system.

**H-Action-4**

**Local Housing Needs:** Counties and cities will **should** conduct a housing needs analysis and evaluate the effectiveness of local housing policies and strategies to achieve housing targets and affordability goals to support updates to local comprehensive plans. Analysis of housing opportunities with access to jobs and transportation options will aid review of total household costs.

**Ec-Action-4**

**Economic Development Elements:** Cities and counties will **should** update (or adopt) their economic development element – tailored to meet the jurisdiction’s unique needs and leveraging public investments – as specified in the Growth Management Act, when conducting the expected 2023/24 comprehensive plan update.

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

Sincerely,

[Signature]

Neil Johnson Jr.
Mayor
City of Bonney Lake
September 12, 2019

The Honorable Ryan Mello  
Chair, Growth Management Policy Board  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA 98104-1035

SUBJECT: City of Bothell – Comments on the Draft VISION 2050 Plan

Dear Chair Mello and Members of the Board,

The City of Bothell appreciates the opportunity to comment on the Draft VISION 2050 Plan. The City of Bothell has been a long-time participant in these regional planning efforts and continues to support the Puget Sound Regional Council Vision 2050 process. Being situated in both King and Snohomish Counties, Bothell has a unique perspective on the different issues and approaches to managing growth.

**Transit Focused Growth**

The City of Bothell continues to support the Transit Focused Growth approach in the draft plan as being the most consistent with the Growth Management Act goals and principles and the best way to maximize the benefits of the urban infrastructure investments (especially high-capacity transit) made by the region. To put the additional 1.8 million people in perspective, that represents the equivalent of 40 more cities the size of Bothell. To accommodate that amount of growth, including another 1.2 million jobs, over the next thirty years requires a coordinated regional effort.

The City’s Imagine Bothell... Comprehensive Plan aligns with the regional growth strategy of focusing growth in centers and areas served by high-capacity transit. Bothell’s Canyon Park regional growth center is an important employment area for the region. The City is currently updating the plan for Canyon Park to meet the new criteria for regional growth centers, including an emphasis on residential development in walkable, mixed use areas served by bus rapid transit lines from Community Transit and Sound Transit. Bothell’s revitalized downtown, which includes the UW-Bothell/Cascadia College campus, has added hundreds of new residents in the past five years with more residential and commercial development planned. Downtown is also scheduled for future bus rapid transit service from Community Transit and Sound Transit.

**Managing Growth**

One of the principles of the Growth Management Act has always been to maintain local decision-making over how to plan for growth. The Draft Vision 2050 Plan reinforces this
principle with policy MPP-RGS-3, “Provide flexibility in establishing and modifying countywide growth targets, provided growth targets support the Regional Growth Strategy.” Local flexibility in accommodating growth is of particular importance to Bothell because of our geographic split between two counties resulting in two sets of growth targets for our city.

The next several policies, MPP-RGS-4 through MPP-RGS-13, reinforce the importance to the region of focusing growth in already designated urban areas, particularly in centers and areas served by high capacity transit and existing infrastructure. Bothell is on the frontier of the urban growth area in Snohomish County. The City understands the importance of preserving rural and resource lands and supports maintaining the current urban growth area. Policy MPP-PS-7 further supports the regional growth strategy policies and reiterates the Growth Management Act principle that cities are the appropriate providers of urban services.

Another important aspect of managing growth within the urban growth area is the ability of cities and counties to transition the governance of unincorporated urban areas, including planning for and managing development and the provision of services and infrastructure. Policies MPP-DP-26 through MPP-DP-29 acknowledge that cities are the providers of urban services and that urban unincorporated areas should be annexed by cities or incorporated. The draft plan also discusses the difficulties faced by cities and counties under existing state annexation laws. DP-Action-6 is a helpful step and Bothell encourages the Puget Sound Regional Council to take a more active role in finding workable solutions to the legislative, economic and political obstacles to annexation. The annexation or incorporation of unincorporated urban areas has been a long-standing goal of the Growth Management Act and countywide planning policies.

**Racial and Social Equity**

The City of Bothell supports policies designed to reverse past practices and policies that reduce or limit opportunities and quality of life for communities of color, indigenous peoples, people with limited incomes, immigrants and refugees. Bothell is working to better engage with the increasingly diverse population of our community. The success of the region, by any measure, depends upon equitable access for all residents to safe and stable housing, economic opportunities, a healthy environment, recreational facilities, and basic health and social services. The development of a regional equity strategy (RC-Action-3) will be a valuable tool for Bothell in the upcoming update of the *Imagine Bothell...*Comprehensive Plan as well as other city plans and programs.

**Affordable Housing**

Affordable housing is another region-wide issue that cannot be solved at the local level; however, Bothell recognizes that local jurisdictions have an important role in the regional effort. Bothell supports the policies and actions in the *Draft Plan* and appreciates the additional actions by the Puget Sound Regional Council to provide technical assistance and additional
support for legislative efforts to expand funding and other affordable housing tools for local
governments.

Thank you, again, for the opportunity to comment on the Draft VISION 2050 Plan. If you have
any questions about these comments, please contact Michael Kattermann, Community
Development Director (michael.kattermann@bothellwa.gov, 425-806-6401).

Sincerely,

Andy Rheaume
Mayor City of Bothell

cc: Bothell City Council
    Jennifer Phillips, City Manager
    Michael Kattermann, Community Development Director
    Barb Mock, Director, Snohomish County Planning and Development Services
    Brian Parry, Sound Cities Association
    Karen Wolf, Senior Policy Analyst, King County
August 19, 2019

To: Paul Inghram, Director of Growth Management

From: Burien City Council

Thank you for the opportunity to comment on VISION 2050. We recognize the importance that this document has in helping to inform regional growth for the next 30 years in ways that will help ensure a high quality of life. It is towards this end, ensuring a continued and improving quality of life for all the residents of our communities, that we offer the following comments.

1. Overall: We suggest inclusion of a glossary to clearly define terms that can cause confusion such as: designated regional growth centers, high-capacity transit centers, local centers (MPP-RC-7), transit corridors (and the relationship to centers), transit station areas, high-capacity transit station areas, energy management technology.

2. Overall: It is unclear what the criteria are for the various call-out boxes in different sections. Some appear to be policy oriented, while others discuss tools. Some have titles and some do not. Is it possible to provide consistency in these highlights?

3. Page 1: We very much appreciate the comprehensiveness of this vision, especially recognizing the need to address climate impacts as the region grows, the importance of working to address inequities faced in our communities, and the role that the environment plays in the quality of our lives.

4. Page 5: We support PSRC using Vision 2050 as a means to help further the region’s goals in reducing climate impacts. Helping to set the policy guidelines to meet the goal of reducing greenhouse gas emissions and to promote regional resilience is critical. We support all that you can do in this regard.

5. Page 12: We recognize the value of the Regional Transportation Plan and Regional Economic Strategy, but also suggest that the region would benefit by having a “Regional Sustainability/Climate Action Plan” that could serve as a “detailed functional implementation plan” and that PSRC consider taking action to address such a need.

6. Page 16: In the “Equity Box:” Consider changing the language to make this stronger. It does not seem to go far enough. If, as a region, we will truly address equity concerns, we must prioritize those who have less. Suggested language: All people are equipped with the means to 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 and have priority access to resources.

7. Page 18: MPP-RC-2: This should go further than simply “Improve services and access to opportunity,” to say: “Prioritize services and access to opportunities for people of color…”

8. Page 19: MPP-RC-8: We suggest changing the last sentence to read: Give higher priority to projects and services that advance affordable housing.
9. Page 20: RC-Action-3: We suggest a 4th bullet: Identifying mechanisms to prioritize access to funding to address inequities.


11. Page 26: In the box definition of high capacity transit – clarify if this is about “centers” or “corridors” (may be done in a glossary)

12. Page 44: “Regional Growth Strategy Policies:” We realize that issues of annexation and incorporation are addressed in other areas of the document, but suggest inclusion of an additional regional growth strategy policy that state: PSRC will identify strategies, incentives, and approaches to ensure that all unincorporated areas within the UGA are annexed or incorporated within cities.

13. Page 44: MPP-RGS-7, 8, and 9: Perhaps these can be combined and clarified. To say “focus significant ...employment growth” in “designated regional growth centers” and “designated regional manufacturing centers” and 75% of the employment growth in “high-capacity transit station areas” makes it unclear where most of the employment growth is expected to occur. Additionally, clarify whether “high-capacity transit” refers to centers or corridors.

14. Page 49: In the middle of the third paragraph change the sentence to read: Public health in some areas in the region is impacted by environmental conditions such as proximity to major roadways, airports, and lack of access....

15. Page 54: Under the discussion about Air Quality, last sentence in the first paragraph change: “...live near major roadways, airports, or other pollution sources.”

16. Page 54: Second paragraph under Air Quality: Change second sentence to read: “However, fine particles, ultrafine particles, air toxics, and ground-level ozone continue to be a concern, especially for communities close to highways, airports, and industrial areas.”

17. Page 55: MPP-En-3: This policy could be strengthened with more specificity. For example: “Reduce the impacts of transportation on air and water quality and climate change through development of sustainability plans.

18. Page 55: MPP-En-4: Add a second sentence to emphasize the need to address marginalized communities: Provide a priority focus on marginalized communities such as people of color and low income.

19. Page 56: Mpp-En-15: Rather than using the term “walking distance,” specify a distance such as ¼ mile or 10 minutes.

20. Page 56: MPP-En-17: Reference work of other agencies such as the Puget Sound Partnership and goals and actions they have established. At the end of the sentence add: “…Puget sound based on guidelines and strategies identified by the Puget Sound Partnership.

21. Page 57: MPP-En-21: Change the sentence as follows: “...including through the use of cleaner fuels in vehicles and aircraft, changes in frequency and timing of flights, and alternatives to driving alone, as well as land use and airport sitting.” Remove the word “design” or clarify its meaning.

22. Page 57: En-Action-1: Clarify whether golf courses are considered open space.

23. Page 59: CC Goal: Change to read: The region substantially reduces emissions of greenhouse gases that contribute to climate change in accordance with the goals of the Puget Sound Clean Air Agency (50% below 1990 by 2030 and 80% below 1990 by 2050) and prepares for climate change impacts.
24. Page 61: First paragraph under Four-Part Greenhouse Gas Strategy: We suggest the need for PSRC to be as forceful as possible in directing counties and cities to set and achieve greenhouse gas reductions from transportation and land use. We suggest the word “meaningful” be changed to “significant.”

25. Page 65: MPP-CC-1: Consider stronger language in this policy: Advance the adoption and implementation of actions that substantially reduce greenhouse gas emissions to meet the goals of state, regional, and local plans and targets adopted by the Puget Sound Clean Air Agency.

26. Page 65: MPP-CC-2: Add language to this policy (or create another) that supports changes in building codes by local jurisdictions to reduce greenhouse gas emissions from buildings. For example: “Provide guidelines and actions for local jurisdictions to support changes in building codes that will reduce building energy use through green building development and retrofit of existing buildings. Consider use of building materials known to sequester carbon.”

27. Page 66: CC-Action-1: Change to the following: PSRC will advance the implementation of the region’s Greenhouse Gas Strategy, including future versions, to equitably achieve its greenhouse gas emissions reduction targets throughout the region...."

28. Page 66: Add an Action as follows: Concurrency and Climate Change: PSRC will review and approve comprehensive plans and select and fund transportation projects in the Regional Transportation Plan through the lens of their contributions to meeting the greenhouse gas emission reduction targets as well as other concurrency guidelines.

29. Page 66: Add an Action as follows: Equity: PSRC will ensure, as it addresses approaches to reducing greenhouse gas emissions through the tools available, including the developing Regional Equity Strategy, that those who are disproportionately harmed by climate change will be centered in mitigation and adaptation activities.

30. Page 66: CC-Action-3: We are very supportive of this policy. We suggest a change as follows: “Cities and counties will develop and implement climate friendly building codes and will incorporate emission reduction policies and activities...”

31. Page 72: last sentence: change as follows: “...parks and open space, access to fresh fruits and vegetables or farmers’ markets, quality grocery stores...” Also, to last sentence in the paragraph add: “Local plans should identify and address community-specific health disparities...”

32. Page 75: Call-out box: Clarify the meaning of “bus rapid transit stations.” Does this include all stops along a Rapid Ride route? (Could be included in glossary.)

33. Page 82: As part of the concurrency requirements, PSRC should address how development occurs with respect to reducing climate emissions.

34. Page 87: MPP-DP-47: This needs to also reflect the opposite. Add the following: “...adjacent land and protect communities surrounding general aviation airports from expanding uses that will degrade the health and quality of life in those communities.”

35. Page 87: MPP-DP-48 and 49 should be similar to comment #30 – also protect surrounding communities from incompatible uses of military and industrial facilities.


37. Page 94: Figure 28 would be more useful if it not only showed “anticipated households in 2050,” but also showed current household distribution (a variation on Fig 27).

39. Page 120: MPP-T-28: Addressing demand management should be identified as a component of this policy. Change the policy to read: **Promote coordinated planning and effective management to optimize the existing aviation system, while minimizing health and noise impacts in communities. Consider demand management alternatives as future growth needs are analyzed, recognizing capacity constraints at existing facilities and the time and resources necessary to build new ones.**

40. Page 129: MPP-PS-7: This could be stated as a stronger role for PSRC to help coordinate and facilitate better consolidation and integration of services from multiple service providers. Suggest: “**PSRC will identify strategies and approaches to help cities, counties, and special service districts, including sewer, water, and fire districts, to move toward consolidation of services to improve costs and public experiences. These entities are encouraged to coordinate planning efforts for optimal provision of services.**”

41. Page 129: MPP-PS-17: Modify this to read: **Coordinate, design, and plan for public safety services and programs, including emergency management. These efforts may be inter-jurisdictional.**

Thank you again for the opportunity to comment.

Sincerely,

Members of the Burien City Council:

______________________________
Jimmy Matta
Burien Mayor

______________________________
Austin Bell
Burien Deputy Mayor

______________________________
Nancy Tosta
Burien Councilmember

______________________________
Krystal Marx
Burien Councilmember

______________________________
Bob Edgar
Burien Councilmember

______________________________
Pedro Olguin
Burien Councilmember
Lucy Krakowiak
Burien Councilmember
September 12, 2019

Councilmember Ryan Mello  
Chair, Growth Management Policy Board  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA 98104-1035

Dear Councilmember Mello:

The City of Carnation wishes to provide comment in response to Puget Sound Regional Council’s draft Vision 2050 plan. We are a small city of approximately 2,200 residents located in the Snoqualmie Valley in King County. Carnation is listed among the 42 jurisdictions in the “Cities and Towns” category of Vision 2050.

Along with other small cities in the valley, we have unique growth challenges due to our lack of proximity to high capacity public transit. Specific to Carnation, we have a disproportion of jobs to housing availability. Carnation is housing rich and jobs poor. We do not have the commercial and industrial means, or the land capacity, to support large employment numbers so many of our residents commute out of the city for work. The “mass transit” option we do have here is the regional Snoqualmie Valley Transit shuttle serving the small cities up and down the valley. We will never be a recipient of high capacity mass transit. The Snoqualmie Valley Trail does provide a means of walking and biking between some of the valley cities. However, we are unable to support multimodal means of transportation out of the valley and to western King County.

Overall, we support the intent of the plan and agree that a regional growth strategy as a whole is a useful and important tool. However, with the focus on locating growth in high capacity transit areas, we remain concerned about how our city can and will grow under PSRC’s proposed policies as we lack this infrastructure. While the plan calls for a 5% growth allocation for Cities and Towns, this must be shared among 18 cities within King County alone. While not all cities have the same growth targets, we feel there is not enough clarity in allocation of these numbers. If the 18 cities are to “share” 44,000 new people equally, that would be 2,444 per jurisdiction. We understand that allocation will not occur in this manner, but it is not clear how allocation will occur beyond county/city coordination. The City, in cooperation with King County, has spent millions investing in the sewer system necessary to accommodate Carnation’s build out capacity. The City has also spent millions on water system infrastructure improvements for that same build out capacity and we are in the midst of planning and building out local transportation network as well. We have 1.3 square miles in our UGA, which our future land use map zones residential. After that, we have nowhere else to go. We do have infill capacity. Still, unless we were granted the entire 2,444 people, we may be unable to meet our growth targets, especially into 2050.

It is important to note that PSRC’s proposed growth targets do not align with the Growth Management Act. PSRC does not have the authority to mandate growth targets or strategies. Each city is granted the right to plan for growth as appropriate under the GMA. The City of Carnation is within an urban growth area and must plan for growth and services within that urban growth area. We want to ensure planning is consistent with the Growth Management Act and not
be limited by PSRC’s arbitrary growth targets. Still, growth targets should not be used as a maximum or limitation but rather as a minimum for a jurisdiction to start from.

We acknowledge that the intent is for Cities and Counties to work together to adhere to PSRC’s regional policies tailored to each jurisdiction. We ask for clearer language particularly for the intent and procedure of this collaboration. What should the procedure be should the city and county disagree on numbers based on PSRC’s policies? We have our own growth targets to achieve and don’t want to be limited by PSRC or the County to reach these targets.

These policies cannot be applied equally to all cities within the four-county region because there are such vast differences between jurisdictions. The plan policies are based on a “perfect situation” but we cannot work in a vacuum and disregard the differences among cities and regions. The city of Carnation will never be a regional growth center and we will never have mass transit. We don’t want to lose what makes Carnation special, but we also don’t want to be limited by growth numbers. We support social justice and equality needs, but these also do not apply the same to every jurisdiction. Social justice should allow for the smaller jurisdictions to plan for their own growth strategies based on the needs of the community.

We must clearly understand the impacts this plan will have on our small city. There should be plain language defining growth allocation among small cities, and for the allowance of the cities to work with the County. The plan stresses much of the growth go towards those cities on the edges of the continuous UGA. This again puts Carnation at a disadvantage. We do not want language or policies that “discourage” or “limit” growth in areas not served by mass transit or areas that are not regional growth centers.

It is important to recognize that the valley cities have challenges that aren’t adequately addressed in the plan and are not experienced by other jurisdictions particularly within King County. We would like references to free standing city and small-town limitations removed. The plan should better address policies specifically geared toward small towns and cities, particularly those on the eastern side of the county. We should not be disregarded as we don’t fit in with the larger, more urban western county jurisdictions.

Thank you for the opportunity to provide comments and we look forward to working collaboratively with you on the Vision 2050 plan.

Sincerely,

Mayor Kimberly Lisk
City of Carnation
September 5, 2019

Puget Sound Regional Council
Attn: Draft VISION 2050 Comments
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

RE: Draft VISION 2050 Comments

Puget Sound Regional Council:

The City appreciates the opportunity to review the Draft VISION 2050 and provide comments aimed to ensure that VISION 2050 recognizes and allows for local governmental land use planning and zoning authority, as required by the Growth Management Act, while providing the needed regional coordination for the future of the Puget Sound region.

RCW 47.80.020 authorized a “regional transportation planning organization” formed through the voluntary association for local governments. PSRC acts as this regional transportation planning organization for King, Kitsap, Snohomish and Pierce Counties. The duties of the organization are established in RCW 47.80.023. specifically (1) states; Prepare and periodically update a transportation strategy for the region. The strategy shall address alternative transportation modes and transportation demand management measures in regional corridors and shall recommend preferred transportation policies to implement adopted growth strategies. The strategy shall serve as a guide in preparation of the regional transportation plan.

It is important to reference RCW 47.80 as a reminder of the authority and duties granted to PSRC. PSRC is charged with the preparation and periodic updates of the transportation strategy for the region, based on adopted growth strategies. PSRC and VISION 2050 does not have authority to establish or adopt growth targets or strategies, rather that authority was granted to the local jurisdictions under RCW 36.70A, the Growth Management Act.

VISION 2050 should provide the “general” framework for the four-county Puget Sound region to use as we plan for and accommodate the region’s projected growth.

As stated in the City of Covington’s comment letter dated April 25, 2019, the City generally supports the draft VISION 2050 and the Transit Focused Growth scenario, however, the City remains concerned that VISION 2050 does not clearly state how the growth percentages, shown in Figure 6 Population Growth 2017-50, Draft Preferred Alternative of VISION 2050 will be implemented or how the percentages will affect the next round of growth target allocations. Figure 6 indicates King County Cities and Towns will represent 5% (44,000) of the region’s growth from 2017-2050. Vision 2050 fails to clearly articulate how these expressed percentages will or could affect the allocation of the future growth targets or whether growth targets will be considered a floor, ceiling or a target with clear ranges. Failure to establish clear
guidelines for the implementation of the growth percentages (shown in Figure 6) and the growth targets, leaves a powerful tool that can be used to dictate future local land use policy unexposed.

The City of Covington maintains its concern that VISION 2050 encourages PSRC to use growth targets as a tool to dictate local land use policy. Previous growth targets allocated to Cities and Towns do not adequately incorporate signed development agreements and local growth trends/patterns 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.

Mandating a city to develop under specific growth targets, regardless if it is under a cap or ceiling, is inconsistent with the GMA. The City is concerned that artificially derived 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:

"... 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 ..."

In closing, we would like to reiterate that the City does support growth occurring adjacent to transit and within regional centers, however, all cities must have the right to plan for the growth a city determines is appropriate per GMA.

We appreciate the opportunity to comment and we look forward to working with you to ensure the growth allocations are set based on local planning authority, are clearly defined as a “target”, and allow for local strategic planning necessary to enable redevelopment and continued economic vitality for the City of Covington.

Sincerely,

Mayor Jeff Wagner
City of Covington Washington
Gena Estep, Director of Community Development for the City of Covington, provided verbal comments at the September 5 Growth Management Policy Board Public Hearing. Ms. Estep stated the City of Covington supports the draft VISION 2050 plan and transit-focused growth. However, she stated that the city has concerns regarding the implementation of growth targets. Ms. Estep requested more clarity in the plan on how the regional growth strategy will affect the local target-setting process.
September 5, 2019

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

Subject: Draft VISION 2050 Plan Comments

Dear Mr. Inghram,

The City of Des Moines appreciates the opportunity to review and comment on the Draft Vision 2050 Plan. The City values the important work of the Puget Sound Regional Council (PSRC) and their continued efforts to work with regional stakeholders to update the plan.

The City of Des Moines previously provided comments on both the scoping and environmental analysis for ViSION 2050. In considering the draft VISION 2050 Plan, we would like to re-emphasize several critical factors in the increased urbanization of Des Moines as a High-Capacity Transit (HCT) Community.

First, critical consideration must be given to the ‘last mile’ dynamic which relates to the provision of travel service from the nearest public transportation node to a home or office. In the case of Des Moines (and other communities), east-west access is limited and presents a barrier to people using transit. Ultimately the value of access to the transit systems will dictate their value in our community. Des Moines recommends amending transportation policies (e.g., MPP-T-9 and/or MPP-T-10 and MPP-T-33 and MP-T-34) to address the ‘Last Mile’ dynamic.

Des Moines (and other proximate cities), 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. Des Moines is supportive of the process anticipated in the new State legislation for siting a second regional airport. Des Moines recommends modifying Transportation Policy MPP-T-28 to recognize the legislative direction to identify a location for a new primary commercial aviation facility in Washington. The language currently in MPP-T-28 is now outdated due to the new legislation.

The Waterland City
Des Moines suggests this policy be revised to read:

“Promote coordinated planning and effective management to optimize the regional existing aviation system and support the process of prior-to-development of a new primary commercial aviation facility in Washington new airports. Accommodate anticipated regional growth in aviation while minimizing health and noise impacts in communities.”

While VISION 2050 acknowledges expansion of passenger only ferry routes and new routes being studied for the future within the context of the Regional Transportation Plan, there are no specific policies or actions contained within VISION 2050. Des Moines recommends adding a transportation policy to VISION 2050 that addresses support for the potential expansion of passenger-only ferry service.

The City of Des Moines is newly designated as a High-Capacity Transit Community (HCTC). The addition of the new designation of HCTC to the regional centers framework is a fundamental shift in the dynamic of future growth in the region. As noted in the plan:

“VISION 2050 incorporates a renewed focus on locating growth near current and future high-capacity transit facilities.” and,

“MPP-RGS-7 Attract 65% of the region’s residential and 75% of the region’s employment growth to high-capacity transit station areas to realize the multiple public benefits of compact growth around high-capacity transit investments. As jurisdictions plan for growth targets, focus development near high-capacity transit to achieve the regional goal.”

The discussion on pages 25 through 30 of the plan recognizes this shift, however the funding policies do not. Funding eligibility must also shift to support the regional growth strategy.

Note that the City of Des Moines does not have a light rail station, either currently or planned, and station area planning would generally occur by neighboring cities. Des Moines will be expected to accommodate a higher portion of regional growth, and with that expectation, funding should be available, although the City will not necessarily control the station area planning. Future light rail will pass through Des Moines and Bus Rapid Transit is located linearly along Pacific Highway South within the City.

Des Moines recommends the following clarifications to VISION 2050 policies related to the allocation of funding to High Capacity Transit areas:

The Waterland City
- **MPP-RC-6** - Give funding priority – both for transportation infrastructure and for economic development – to support designated regional growth centers, and manufacturing/industrial centers, and High Capacity Transit areas consistent with the regional vision. Regional funds are prioritized to those areas expected to accommodate regional growth centers.

- **MPP-RC-7** - Direct subregional funding, especially county-level and local funds, to countywide centers, high capacity transit areas with a station area plan, and other local centers. County-level and local funding are also appropriate to prioritize to regional and local centers.

- **MPP-RC-8** - Recognize and give regional funding priority to transportation facilities, infrastructure, and services that explicitly advance the development of housing in designated regional growth centers and high capacity transit areas. Give additional priority to projects and services that advance affordable housing.

Thank you for the opportunity to comment, and for serious consideration of the City’s comments and concerns. We look forward to the opportunity to continue this discussion on behalf of all of our residents.

Sincerely,

Matt Pina  
Mayor

Michael Matthais  
City Manager

---

The Waterland City
September 16, 2019

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

SUBJECT: City of Duvall comments on the July 19, 2019 Draft VISION 2050 Plan

Dear Mr. Inghram,

The City of Duvall is writing in appreciation for the opportunity to submit comments and overall support of the July 19, 2019 draft VISION 2050 plan. King County has followed the intent of the Growth Management Act through the development of urban centers, protection of open space and natural resource lands, and truly focused the majority of growth within cities and the Urban Growth Area.

The City of Duvall is a bedroom community that holds a unique designation as a non-contiguous UGA city that contains multiple future UGAs and UGA Reserves. At the same time, we are located more than 8 miles away from the nearest freeway and are just south of the Snohomish County line. The main thoroughfare through downtown is State Route 203, which runs from Monroe and the US-2 corridor in the North to Fall City and the I-90 corridor in the South.

As population continues to increase, particularly in South Snohomish County and contiguous cities, the Duvall and unincorporated King County roads have seen dramatic increases in pass through traffic over the years with a decrease in county road funding. This population growth, combined with stalled funding for critical regional projects and the infeasibility of expanding SR 203 due to geography and environment, has resulted in gridlock on Highway 522 and Highway 9. This transportation impact combined with a decreased outlook for revenue generation will result in cities such as ours needing new and enhanced financial tools or assistance in addition to greater communication in how our region plans and implements population growth.

We are in support of the letter put forth by the King County Growth Management Planning Council and request further consideration of the following unique challenges jurisdictions like ours are facing:

- **Lack of Planning for Transportation** – Non-contiguous UGA cities in more rural areas will continue to take on additional traffic from other jurisdictions, with little or no relief unless the way we plan for housing, job growth and transportation connections is altered.
• **Transportation Concurrency** – In order to meet the intent of the GMA, changes need to be made to transportation planning and concurrency requirements, particularly on rural state highways.

• **Financial Stability of Cities** – Non-Contiguous UGA cities will need financial assistance in the form of enhanced state share revenues or other sources in order to be sustainable as residential growth does not pencil out financially for bedroom communities that are service providers for residents in and out of City limits.

• **Job Growth** – Consider allowing additional jobs in non-urban cities to encourage local niche job growth and reverse commuting, where feasible.

Thank you for consideration of our comments. If you have any questions about any of these comments please do not hesitate to contact us.

Sincerely,

Amy Ockerlander
Mayor, City of Duvall

CC: Duvall City Council
    Lara Thomas, Community Development Director
September 9, 2019

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

SUBJECT: City of Edmonds Comments on the July 19, 2019 Draft VISION 2050 Plan

Dear Mr. Inghram:

The VISION 2050 effort to update our regional planning represents excellent work. We also appreciate that many of our city’s past comments, as well as past comments from Snohomish County Tomorrow, have been incorporated into the July version of the Draft VISION 2050 Plan.

We continue to support the Transit-Focused Growth alternative, which will take advantage of our region’s investment in transit infrastructure and also help reduce sprawl that would otherwise lead to more traffic congestion and other negative impacts. At the same time, we are comfortable with the County’s previously proposed growth of up to 6 percent in rural areas because, while this percentage recognizes some amount of vested lots, it also continues an appropriate downward trend in rural growth. Furthermore, we support consideration of the timing of future growth, especially in cities where light rail has not yet been extended, as discussed on page 43 of the draft plan.

Our city also supports flexibility in setting and modifying countywide population distributions among the city and county governments within each county, consistent with VISION 2050 goals. Pages 23- 24 of the draft VISION 2050 acknowledges the need for a stable framework, along with some flexibility. At the same time, our city does not advocate for open-ended flexibility in establishing or amending urban growth areas. Similarly, we support VISION 2050’S
last paragraph on page 24, which notes that counties must work with their cities with regard to UGA designations and that, in general, only minor amendments to UGAs are needed. Where such adjustments are to be considered, a thoughtful and collaborative process should be carried out to ensure urban growth is focused in areas where transit and other infrastructure will accommodate it.

The Multi-County Planning Policies that comprise a significant part of VISION 2050, represent blending of past policies and some new ones. This builds from our past regional planning, as well as what we have learned during the last ten years. We especially appreciate the extra attention in VISION 2050 to climate change issues and to expanding the range of housing choices. In addition, the proposed new policies provide welcome clarifications about tribal lands and military bases. More work on these subjects will be needed as plan implementation occurs.

Finally, regional coordination must be a key part of implementing the final plan. This includes planning for and proactively seeking funds for multimodal transportation, providing for housing, and preserving designated open space and natural resource lands. We look forward to continuing to work with you and our colleagues in the next stages of this process.

Thanks for your consideration of our comments.

Sincerely,

[Signature]

Dave O. Earling
Mayor

CC: Edmonds City Council
Shane Hope, Development Services Director

- Incorporated August 11, 1890 -
Sister City – Hekinan, Japan
C - 38
September 16, 2019

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

Re: Vision 2050 Preferred Alternative

Dear Mr. Inghram:

The City of Everett appreciates the PRSC’s efforts to incorporate our previous feedback into the final draft of the Preferred Alternative for Vision 2050. The City has additional comments for consideration as either amendments to the final Preferred Alternative prior to adoption of Vision 2050, or for consideration in the ongoing implementation of Vision 2050.

1. Everett supports the modified *Transit Focused Growth* alternative as the Preferred Alternative for Vision 2050. It emphasizes future growth in proximity to our regionally designated growth center (Metro Everett) and high capacity transit service and facilities, and has the least overall environmental impact among the three alternatives.

2. As stated in our April 23, 2019 comment letter on the DSEIS, 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. Everett appreciates the addition of RC Action-5 and RC Action-6, which call for additional funding, and changes to State law as necessary actions for achieving the vision.

3. The Preferred Alternative shows an increase over 2017 of 87,000 more people and 89,000 more jobs by 2050. That represents 20% of the county’s future population growth and 39% of its job growth. The Preferred Alternative also provides much more growth in Everett than provided for under our 2035 comprehensive plan growth targets, as indicated below. Since 2000, Everett’s population has grown at an average annual rate of only 1,095. We would have
to grow at more than 2.5 times that growth rate (2,748 annual average population gain) for the preferred 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.” Since light rail will not arrive in Everett until 2036, more than half way through the 2020 to 2050 planning period, most of our projected growth under Vision 2050 is not likely to occur until the latter part of the planning period.

<table>
<thead>
<tr>
<th></th>
<th>2017</th>
<th>2035 Everett Growth Targets</th>
<th>2050 Transit Focused Growth</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>110,000</td>
<td>165,000</td>
<td>197,000 (+32,000 above 2035)</td>
</tr>
<tr>
<td>Employment</td>
<td>105,000</td>
<td>140,000</td>
<td>194,000 (+54,000 above 2035)</td>
</tr>
</tbody>
</table>

4. Everett cannot commit to any specific growth targets at this time. Much more planning work at the countywide and local level, including Countywide Planning Policies (CPPs), buildable land analyses, local visioning, and public input, must take place to establish realistic and supportable growth targets for individual jurisdictions. Multi-county Planning Policies (MPPs) and CPPs must allow for flexibility in setting and adjusting numerical targets for population, housing and employment growth. Everett appreciates the addition of MPP-RGS-3, calling for flexibility in establishing and modifying countywide growth targets. However, we ask that it be modified to read as follows:

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

5. We also support adding a sentence to RGS-Action-3, as follows:

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.

6. Everett agrees with most of the proposed policy amendments in the Multi-county Planning Policies (MPPs). The additional emphasis on maintaining stable urban growth area boundaries, addressing equity, climate change, 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.
7. We appreciate MPP-RC-6 prioritizing regional funding for infrastructure and economic development to designated regional growth centers and MIC’s, like Everett. Prioritizing regional funding investment in the regional growth centers will help local jurisdictions 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 been able to achieve the levels of growth anticipated in Vision 2040.

8. 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. 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 and the update to the regional transportation plan 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. Expanding the high capacity transit system is critical if the assumption that 39% of Snohomish County’s future job growth will be in Everett is to be realized.

9. We suggest that the Preferred Alternative include additional policy language regarding coordination between PSRC and 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 job and population growth, especially in regionally designated growth centers like Everett.

10. As stated in our April 23, 2019 letter, 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. Cleanup is typically a local action in coordination with State and/or Federal agencies, not Countywide planning bodies.

Identification and Clean-up of Underused Lands: Countywide planning bodies, in cooperation with their cities, 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.

11. The strengthened housing policies and actions call for a much-needed regional housing assessment. We appreciate Action items H-Action-1 and H-Action-2, calling for the PSRC to develop guidance for developing local housing targets by type (single-family detached, multi-family, etc.), tenure (owner-occupied, rental), and based on projected household income ranges (relative to Area Median Income for each county). These actions by the PSRC are necessary for individual jurisdictions to identify and plan for adequate land and appropriate housing densities to meet local housing needs.
12. Everett and many Snohomish County cities have expressed concern regarding the difficulty of implementing portions of the regional plan due to barriers to annexation. Everett joins SCT in support of 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 closing, with the incorporation of the recommendations stated in this letter, Everett supports the adoption of the Preferred Alternative for Vision 2050. Please contact planning director Allan Giffen, or Deputy Mayor Nick Harper if you wish to clarify any of these comments.

Sincerely,

[Signature]

Cassie Franklin, Mayor

Cc: City Council  
    Nick Harper, Deputy Mayor  
    Allan Giffen, Planning Director
September 13, 2019

Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035
Via email at vision2050@psrc.org

RE: Draft Vision 2050 Plan Public Comment

To Whom It May Concern:

Thank you for this opportunity to comment on the Draft Vision 2050 Plan. The City of Gig Harbor recognizes the importance of having a regional strategy to promote smart, healthy growth and is committed to supporting these efforts. As such, the City is an active participant with the Pierce County Regional Council and would like to offer its full concurrence with the comment letter provided by that body as a whole. We feel the letter effectively voices county-wide concerns, as well as those of our own. That said, we would also like to offer the following concerns, more specifically.

The City of Gig Harbor is a bit of an anomaly within the region. It is not contiguous to a major metropolitan area, yet obviously proximal to one. It is within Pierce County, yet seemingly removed due to the perceived barrier the Tacoma Narrows presents. It is cut off from the regional transportation system having no ferry service, rail or bus rapid transit; yet, State Route 16 is a highly utilized commuter corridor and the subject of a WSDOT congestion study. Our population is a mere 10,000+, yet we are the service center for upwards of 60,000+ residents in the urban and rural unincorporated areas of the Gig Harbor Peninsula and Fox Island. An additional 16,000+ residents, approximately, of the Key Peninsula utilize services in Gig Harbor to some degree.

Gig Harbor has experienced unprecedented growth within the last 9-years, with our population growing from 7,120 people in 2010 to 10,700 in 2019 (34% total increase). And due to projects that are in the pipeline already, we expect to grow another 2,000 people by our next Comprehensive Plan update (16% additional increase).

Gig Harbor is a place where people want to live, not because of its proximity to transit but because they are attracted by the scenic harbor, water-based recreation, culture and small-town character. The rapid growth experienced in the last few years was not predicted or taken into account during the last Regional Growth Strategy Update. As such, this rapid growth has had a negative impact on our citizen's quality of life. The city has amended its land use regulations in order to address the issue on a local level and we need your help to address this on a regional level.
The City respectfully asks that PSRC take into account communities such as ours that do not fit neatly into a particular category. The City of Gig Harbor is interested in accommodating modest population growth outlined in the preferred alternative and modestly increasing our employment target, as to implement the goal of a jobs-housing balance. Growing living wage jobs is a high priority for the City of Gig Harbor.

Overall, the City is supportive of the preferred alternative for regional growth and appreciates consideration of our comments. In whatever way we can, the city will support and implement goals and policies outlined the document at our local level.

We look forward to continuing our involvement in this process to properly set the stage for our upcoming Comprehensive Plan update.

Respectfully Submitted,

Mayor Kit Kuhn

Cc: Katrina Knutson, AICP Community Development Director
    Carl de Simas, Senior Planner
    GMCC
September 10, 2019

Paul Inghram, AICP
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, WA 98104

Vision 2050 Comments

Dear Mr. Inghram:

Upon further review of the draft Vision 2050 plan, there is a concern that Policy MPP-T-21 will have a negative impact on future investments needed in some of the transportation corridors within Snohomish County such as Highway 9, Highway 92, SR 522 and US 2.

PSRC should consider revising this policy as follows:

“Avoid construction of new major roads and capacity expansion of existing roads in rural and resource areas. Where increased roadway capacity or expanded capacity for existing roads is warranted to support safe and efficient travel through rural areas, appropriate rural development regulations and strong commitments to access management should be in place prior to authorizing such capacity expansion in order to prevent unplanned growth in rural areas.”

Our City recognizes the increased demand for affordable single family homes in the rural and suburban areas of Snohomish County that will continue to impact transportation corridors outside of these high density urban areas. The need to support transportation investments in these areas is critical for current and future of residents living in NE Snohomish County.

Thank you for considering this request.

Sincerely,

Brent Kirk
City Manager
City of Granite Falls
September 16, 2019

Councilmember Ryan Mello
Chair, Growth Management Policy Board
Puget Sound Regional Council
1011 Western Ave # 500
Seattle, WA 98104

RE: Vision 2050 and related concerns

Dear Councilmember Mello:

Thank you for the opportunity to comment on PSRC’s draft VISION 2050.

The following actions are important context for these comments:

- Issaquah’s Central Issaquah Urban Core was designated by PSRC as a Regional Growth Center in 2015.
- Issaquah will achieve the State’s 2006-2031 mandatory growth targets for housing in approximately 2020. We are currently at the 43% of the 2006-2031 jobs target.
- Issaquah’s City Council adopted a Housing Strategy Work Plan in 2017 that aims to address identified housing gaps in the community and is in the process of implementation.
- Following a long-standing history of successful regional partnership and open space acquisition, the City Council approved a plan to preserve 46 acres on Cougar Mountain in 2018, in partnership with King County and the Trust for Public Land.
- As a direct benefit of being a Regional Growth Center, PSRC awarded Issaquah two design grants; over $1.8M for Newport Way, Maple St to Sunset Way (2016); and over $1.5M for Newport Way, SR900 to 54th St (2018).
- Issaquah continues to implement VISION 2040 through these actions of focusing growth near transportation, creating vibrant urban centers and protecting natural resource lands.

With our history of successful partnerships as our lens, Issaquah’s City Council received a presentation on the draft VISION 2050 at their August 12 meeting. I
have summarized those Council considerations into two categories; directly related to draft VISION 2050; and related to PSRC and Growth Management.

A. Draft VISION 2050

1. Issaquah is supportive of the vision and goals outlined in VISION 2050, as they generally mirror our own. However, Issaquah's ability to continue implementing the regional vision is hampered by the financial challenge of providing infrastructure and services as growth occurs.

Concerns:

a. Transportation funding (roads, transit, etc.) is not adequate to keep up with demand. There appears to be no direct connection with transportation needs, funding sources, and residential and job growth. Issaquah could be overcommitted on capacity to add jobs and housing if that capacity is not linked to the timing of funded infrastructure improvements.

b. There is a need for increased funding for non-motorized and transit funding for the region in order to provide viable transportation alternatives.

c. VISION 2050 needs stronger language confirming PSRC support of ST3 project completions and should include a statement regarding the impacts on managing growth if ST3 is not completed.

2. Issaquah has a dual distinction of having a regional growth center and being on the edge of the urban growth area (UGA).

Concern:

a. Conditions at the UGA boundary are not mentioned or addressed in VISION 2050 that could have significant detrimental impact to livability of our community. Issaquah currently experiences overflow of both our Transit Center and Park and Ride, resulting in transit riders parking in our neighborhoods and commercial areas. VISION 2050 should address how to handle these issues when ST3 arrives so that Issaquah and the surrounding area reap the benefits of transit without the detrimental impacts.

3. Since the adoption of the Growth Management Act, Issaquah has been a strong regional partner by accommodating each set of housing and job targets. In addition, Issaquah successfully applied for and received a Regional Growth Center designation for Central Issaquah's Urban Core.

Concerns:

a. There is no acknowledgement of successful commitments met for those cities that have planned and accommodated growth, and there is concern that those cities, including Issaquah, will be asked to take an equal share of new growth targets, regardless if other urban areas have met their obligations or not.
b. Given the partnership with PSRC and local jurisdictions, there is a desire that PSRC have a more active supporting role for cities in the city/county negotiations for growth targets.

B. PSRC and Growth Management

1. Issaquah has a dual distinction of having a regional growth center and being on the edge of the urban growth area (UGA).

   Concern:
   a. VISION 2050 does not specifically identify UGA boundary transportation conditions and constraints. PSRC does not allocate funds for transportation projects outside the UGA boundary, therefore, boundary cities are required to separately lobby state and federal authorities for the regional transportation improvements that can impact the successful absorption of growth at the UGA edges. In Issaquah’s case, this means improvements to I-90 east of Issaquah, improvements at the I-90/SR18 interchange, and capacity and safety improvements on SR 18 from I-90 to Issaquah/Hobart Road. PSRC does not manage those transportation funds and does not have a seat at the negotiating table even though the lack of investment could compromise the success of UGA boundary cities, and their ability to provide adequate transportation for residents to get to work and home again. Cities should plan for these impacts in their Comprehensive Plans; however, cities need the leverage and muscle of PSRC to get state and federal funding.

2. Issaquah continues to be a strong regional partner by accommodating each set of housing and job targets. In addition, Issaquah successfully applied and received a Regional Growth Center designation for Central Issaquah’s Urban Core.

   Concerns:
   a. Establishing growth targets is done through county and city negotiations where PSRC is aware yet not involved. There are no multicounty planning policies in VISION 2050 that specifically address the setting of equitable growth targets among the counties and cities.
   b. There is no acknowledgement of successful commitments met for those cities that have planned and accommodated growth, and there is concern that those cities, including Issaquah, will be asked to take an equal share of new growth targets, regardless if other urban areas have met their obligations or not.
   c. Given the partnership with PSRC and local jurisdictions, there is a desire that PSRC have a more active supporting role for cities in the city/county negotiations for growth targets.

In summary, Issaquah’s continued success at growth management implementation has come with fiscal challenges that threaten our community’s quality of life. Current revenue sources to implement VISION 2050 are insufficient to support
necessary planning efforts and infrastructure improvements and natural area preservation through 2050. Issaquah looks forward to continued collaboration with PSRC to find solutions for our shared future. Please contact Long Range Policy Planning Manager Trish Heinonen if you have any questions.

Sincerely,

Mary Lou Pauly
Mayor

Cc:
City Council
Andrea Snyder, Interim City Administrator
Keith Niven, Development Services Director
City of Kenmore comments on the draft Vision 2050 Plan. Kenmore appreciates the opportunity to comment on the draft of VISION 2050. Here are our thoughts:

1. VISION 2050 should address the financial constraints facing counties and municipalities implementing VISION 2050. Consideration should be given to a new policy calling for support for local and regional efforts to develop state legislation to provide new fiscal tools to support local and regional planning and to support infrastructure improvements and services.

2. While we generally support the policy direction in the Plan, we are concerned with policy direction that implies that the City will take a certain action at the local level. For example, on p. 66, CC-Action-3 states that cities will incorporate emission reduction policies and activities in comprehensive planning. On page 98, H-Action-4 states that cities will conduct a housing needs analysis. These are issues (and financial outlays) that our Council should consider and decide upon. As a general policy document, there should be no specific action mandates in the Plan.

3. There is not much discussion of preservation in the housing section, despite its significance for low-income households and the displacement issues redevelopment raises.

4. Lastly, we have several minor editorial comments:
   - p. 6. The Sammamish River should be mentioned.
   - p. 10-11. While the Plan lauds diversity, this 2-page photo depicts little, if any, diversity.
   - p. 78. This map should include Kenmore’s future high capacity transit station.
   - p. 93. This page states that certain groups have been “systematically excluded from homeownership for decades,” implying that this practice is current and ongoing even though it’s presently illegal. Should this be rephrased to say certain groups have been “historically excluded from homeownership”?

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September 10, 2019

Councilmember Ryan Mello  
Chair, Growth Management Policy Board  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA  98104-1035

Dear Councilmember Mello,

Thank you for the opportunity to comment on the draft Vision 2050 plan. Kent supports the transit-focused growth alternative and has embraced transit-focused growth for years in our Comprehensive Plan and subarea plans. Additionally, we support the vast majority of policies and actions within the plan—it represents a veritable stockpile of best practices when it comes to regional planning.

**Kent’s Unique Point of View**

Kent is asked to provide a lot for the region as a Core City with both an RGC and a MIC. We are asked to accommodate significant growth in our RGC to complement the high-capacity transit there; simultaneously, we are asked to preserve and protect substantial industrial land for the region’s economy within our borders, in accordance with PSRC’s MIC designation and the ports’ various industrial land preservation policies. We have risen to these challenges by investing resources in subarea planning efforts, following best practices for zoning for dense urban development in the RGC and core industrial in the MIC, and implementing a variety of programs and projects that support the goals of both the RGC and the MIC. In fact, we are right now in the middle of a subarea plan for the MIC, which is scheduled for completion in early 2020. That work is ongoing but what we have learned already heavily informs the following comments. Key findings thus far, explored in the following sections of this letter, include the incredibly broad range of business types considered to be industrial, the need to specifically cultivate manufacturing within industrial lands, and the cost of externalities of trucking-intensive land uses.

Like many communities, development pressure and growth bring fiscal challenges (please see GMPC letter, to which Kent is a co-signer, for our shared policy
proposals, particularly those related to public financing). Unlike many communities, we also have the pressure of accommodating industrial land in an urban city, which creates quality of life conflicts such as freight corridor roadway design being hostile to active transportation, truck parking in residential areas, and more. A major shift to occur since Vision 2040 has been that industrial lands increasingly serving e-commerce and large wholesale/distribution uses, rather than a more diverse industrial job base; these also happen to be the most trucking-intensive of all industrial uses. A recent e-commerce fulfillment center built in Kent is 2,380,000 square feet in size—this facility likely produces more than 1,700 truck trips every day (according to numbers from Institute of Transportation Engineers’ Trip Generation Manual). The facility also employs just 2,000-4,000 workers (depending on season), or one worker per 600-1,200 square feet—that’s approximately 1/10th the employment density of an office building in South Lake Union, despite similar profitability for land owners in today’s market. In other words, what gets built in the Kent Valley today increasingly skews towards developments with the following negative characteristics: large footprint, lower job density, lower wage work, and heavier truck movement. This kind of facility has major negative externalities for an urban community and Kent would like PRSC to lead the region in exploring the nuance of different industrial land use types given what we have seen transpire in Kent’s industrial lands.

The Kent Valley MIC is valuable to the region’s economy—we’re where Bellevue and even Boise, Idaho, store their stuff—or where Capitol Hill has its pastries made and coffee beans roasted. We also happen to be where the advanced manufacturing and high-tech hardware expertise is concentrated, supporting the greater Seattle technology industries, from commercial space to biotech devices. We recognize what an incredible asset the MIC can be for the City of Kent, and how it is essential to support all other Puget Sound industries. As we re-examine our MIC and greater Kent Valley zoning, land use, programs, tools and incentives, we need support from PRSC to realize the benefits of the MIC, capitalize on the assets, and share the costs of externalities with the region. PRSC’s understanding of these issues is critical to sharing the burdens and the prosperity generated by Kent’s MIC.

A Modern Conception of Industrial Lands

The most important nuance to understand about industrial land is that the concept encompasses a range of business types that vary considerably in characteristics and occupational profile. The following excerpts from Vision 2050 represent opportunities to delve into this nuance, and for PRSC to take a more active role in promoting good industrial land use policy, forward-thinking regional industrial land planning, and interjurisdictional coordination to advance job growth and grow the regional economy.

Generalizing all industrial land uses as somehow “heavy” or “dirty” is a common misconception. In fact, many modern industrial users utilize high-tech machinery, have many employees utilizing computer workstations, and in many cases
producing no negative externalities associated with industrial use such as pollution or noise. Indeed, regulatory changes in recent decades including performance standards and modern fire and life safety codes effectively make such negative externalities unlikely anyway, by prohibiting odor, noise, etc.—and environmental regulations mitigate pollution as well. Essentially, the common understanding of industrial lands is completely out of sync with modern business realities, in which industrial businesses most often have more in common with offices than slaughterhouses or coal plants.

Language such as “concentrated manufacturing and industrial land uses that cannot be easily mixed with other activities” on page 25 is woefully out of touch with just how easy it is to mix other activities in with manufacturing and other industrial uses. For example, Kent has an office complex in the heart of our industrial lands, which includes a mix of uses from a daycare to a bakery storefront. These commercial and service uses have served nearby employees of our industrial lands for decades and address crucial quality of life issues for working families. This office complex supports many of the industrial businesses (Alaska Airlines, Blue Origin) that have other facilities in the industrial valley but are demanding more office space to support their operations.

We are concerned that the language on page 74 is similarly out of touch with reality. “Manufacturing/industrial centers... generate substantial revenue for local governments, and offer higher-than-average wages.” We cannot stress enough how little revenue our industrial lands produce for this local government since streamlined sales tax went into effect in 2011. One fast food restaurant (a commercial establishment, estimated at annual retail sales of $2 million) generates more revenue in taxes than a 500,000 square foot distribution business.

The cost to maintain the infrastructure needed for the MIC to be a competitive place for locating a business—specifically the cost of road maintenance, as uses locating in MICs tend to generate significant trucking activity, requiring large roads that degrade quickly under the weight of the trucks—is not commensurate with the revenue generated from even the most profitable MIC industries. We suggest rewording to be clearer about the potential for MICs to generate revenue for local governments. The potential exists because some industrial users produce more revenue than others, and if a jurisdiction is being strategic about supporting those more profitable industries, there is some revenue potential. Similarly, MICs have the potential to offer higher-than-average wages, but only if cities and the region invest time and energy in retaining those higher quality jobs. PSRC should be aware: without intervention, MICs could become hubs for low-wage, low-skilled warehouse jobs that are eventually automated out of existence. (Automation may generate higher paid technician jobs; however, those will be fewer in number than the jobs they replace.) Most manufacturers exist in a highly interconnected web of global supply chain, making it difficult to nimbly respond to increased costs; large, national brand name corporations have more flexibility and ability to pass on costs or are better capitalized to radically alter their business operations. It is only
through the specific and deliberate cultivation of small- and medium-sized manufacturing and other supportive industries, to help protect lower cost lands for them in the growing real estate competition with e-commerce and distribution users, that MICs can realize this promise of higher-than-average wages.

Other examples of this misconception occur on page 81: “Local codes limit uses within these industrial areas, which benefits not only the industries located in these areas but also protects the neighboring communities from harmful impacts.” We have manufacturing businesses who are clamoring for more diverse uses near them—specifically more lunch options or other services (commercial), and in some cases even housing for employees (residential). To attract and retain a talented workforce, advanced manufacturing tenants are interested in high quality workplaces with amenities and destinations nearby. If you think of all the things that make working at PSRC in your present location a positive experience—all of the coffee shops and restaurants nearby, the ability to easily stop at a convenience store on your way to the train, the transit options—these are urban amenities that are desirable to workers in the Kent Valley as well, and they help attract the talent our industrial businesses need to continue to be successful in this modern economy. Imagine if PSRC were in an industrial area, with very large blocks, distant destinations, very few lunch options, no interesting urban plazas to walk to for a break... When we heavily restrict land uses arbitrarily, we make industrial areas worse places to work.

For decades, PSRC, the ports and local agencies have been repeating the mantra that industrial land must be preserved. We believe it is time to look beneath that question and start identifying what specifically is important to preserve, and why. Vision 2050 does not advance this conversation; “preserving” industrial land is assumed to have value, and that value is unarticulated. On page 81, Vision 2050 “calls for cities and counties to continue preserving industrial lands and limiting incompatible land uses.” We believe that articulating the point of such preservation is key to identifying successful strategies for preservation over the long term, and may result in more beneficial outcomes.

If MPP-EC-9, “Promote economic activity and employment growth that creates widely shared prosperity and sustains a diversity of living-wage jobs for the region’s residents” is any indication, one of the main points of industrial land preservation must be jobs. Indeed, page 74 supports this with verbiage about MICs: “these centers preserve lands for living-wage jobs in basic industries and trade and provide areas for employment to grow in the future.” If the point of industrial land preservation is quality employment, we need to rethink what uses are truly incompatible. While Kent is not necessarily a proponent of introducing residential into industrial areas, we do believe the conversation is worth having and we need the room and support to have that conversation (see the Sightline piece from May 2018, “Are Outdated Notions of Industrial Areas Hiding a Giant Housing Opportunity”). On page 88, then, we propose the following change: DP-Action-2: Industrial lands. PSRC will update its inventory of industrial lands, evaluate supply
and demand for industrial land across all industry sectors, and identify strategies to preserve industrial lands jobs and businesses in the region in coordination with jurisdictions’ efforts to support their industrial land base.

The Importance of Manufacturing

Another nuance about industrial land policy is that not all industrial jobs are alike. On page 104, Figure 29 shows growth in all sectors for Central Puget Sound Region Employment and Forecast except one: manufacturing. Manufacturing is the only sector to decline in absolute numbers of employment in the forecast for the region, yet Vision 2050 is silent on this decline. The entire Economy chapter does not once include the word “manufacturing” in the text body (aside from policies). Yet PSRC has produced voluminous reports documenting manufacturing’s vital contributions to regional growth. Support for manufacturing, including supporting jurisdictions seeking to keep manufacturing jobs in the Puget Sound, should be a priority in Vision 2050.

We do not and cannot expect an even distribution of all business types across the Puget Sound’s job centers. With significant population in close proximity to the Kent Valley, the highly concentrated industry of manufacturing located in our industrial area needs to be protected and encouraged to grow. This would help keep a variety of high quality jobs closer to these populations and reduce the need for commuters to travel into Seattle and Bellevue each day. Reducing commute times and providing opportunities for higher quality jobs offers a cascade of equity and quality of life benefits to populations that may not be able to afford homes closer in to other job centers.

Manufacturing is a fundamental building block of the region’s economy. The skills and competencies grown in manufacturing sectors have ripple effects to other industries. Accordingly, we suggest PSRC take a more proactive and specific approach to supporting manufacturing job creation and retention through the following policy amendments:

- MPP-EC-3: Support established and emerging industry clusters that export goods and services and import capital, and specifically work to reverse the downward trend in manufacturing jobs, supporting efforts to retain and attract more manufacturing to the region.
- MPP-EC-22: Maximize the use of existing designated manufacturing/industrial centers by focusing appropriate types and amounts of employment growth in these areas and by protecting them from incompatible adjacent uses—facilitating their evolution in response to economic and industry changes.
- Propose new policy MPP-EC-24: Sustain and enhance the region’s manufacturing and allied industries, especially within MICs, recognizing the important role they play in the regional economy.
The Difficulties with Trucking-Intensive Land Uses

In addition to supporting manufacturing, PSRC should consider a more proactive and specific approach to supporting jurisdictions that face significant burdens from trucking-intensive land uses in industrial areas. As described above, the costs to maintain the pavement on major trucking routes far exceed the resources of any individual jurisdiction. We propose the following ways PSRC can show support to jurisdictions that subsidize the regional economy’s trucking activity:

- Propose new policy MPP-EC-25: Recognize the costs of e-commerce and large format wholesale/distribution uses on jurisdictions with MICs, and work to collectively share the cost burden of negative externalities associated with trucking-intensive land uses.
- MPP-T-25: Ensure the freight system supports the growing needs of global trade and state, regional and local distribution of goods and services, *while proactively seeking ways to quantify and address the impacts of freight movement on urban jurisdictions.*
- MPP-T-26: Maintain and improve the existing multimodal freight transportation system in the region to increase reliability, efficiency, *safety, sustainability,* and mobility, and prepare for continuing growth in freight and goods movement *while pursuing modern, integrated approaches for moving freight that do not sacrifice the comfort of other modes.*

Conclusion

It is time for PSRC to join Kent in a reconsideration of industrial land use policy. Vision 2050 lays out an ambitious and thoughtful regional planning framework for housing, environment, and population growth—we ask that the same thought be put into the policies relating to MICs and industrial land use, to reflect the realities of industrial real estate trends over the last several decades. There are challenges inherent in “preservation” of something as dynamic as industrial lands—which is why continued reevaluation and collaboration with those affected is so crucial. The City of Kent is committed to making our industrial valley a thriving, resilient industrial ecosystem, and a great place to work, just as PSRC is committed to the central Puget Sound region providing an exceptional quality of life and an innovative, thriving economy. Let’s work together to make both visions a reality.

Sincerely,

Dana Ralph
Mayor
September 16, 2019

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

RE: VISION 2050 Draft Plan and Regional Growth Strategy

Dear Executive Director Josh Brown,

Thank you for the opportunity to comment on the VISION 2050 Draft Plan and Regional Growth Strategy. Kitsap County has reviewed the available documents including past plans the Draft Supplemental Environmental Impact Statement and offer the following comments.

Kitsap County wants to thank the Puget Sound Regional Council (PSRC) staff for working closely with County and city staff to develop a population target strategy that supports our local communities.

The proposed targets in the Regional Growth Strategy for Kitsap consider the significant high capacity transit investments in Kingston and set the stage for a cohesive and collaborative planning process between our High Capacity Transit Communities and associated unincorporated UGAs. The explicit support of these strategies in the Draft Plan will be key to ensure clarity as we move into our Countywide Planning Policy and Comprehensive Plan updates.

The Plan has also reviewed other regional issues such as social equity, climate change and public health. While all local jurisdictions are working diligently towards these goals, how will their inclusion be defined, measured and implemented across multiple jurisdictions with diverse characteristics.

Lastly, the Plan’s acknowledgment of the significant role of the U.S. Military in the employment and population pressures of our region is an important step. These installations are huge employers for our jurisdictions, specifically Kitsap and Pierce, and planning for our communities must give them proper consideration in our transportation planning and future off-installation funding.
Thank you again for the opportunity to provide comment on the VISION 2050 Draft Plan and Regional Growth Strategy. If you have any questions or need additional information, please contact us at (360) 337-7080 or Eric Baker, Policy Manager, at (360) 337-4495 or ebaker@co.kitsap.wa.us.

Sincerely,

Edward E. Wolfe, Chair
Robert Gelder
Charlotte Garrido

cc: PSRC Growth Management Policy Board
   PSRC Executive Board
   PSRC Transportation Policy Board
   Kitsap Regional Coordinating Council Board
   Rob Putaansuu, Mayor, City of Port Orchard
   Greg Wheeler, Mayor, City of Bremerton
   Becky Erickson, Mayor, City of Poulsbo
   Kol Medina, Mayor, City of Bainbridge Island
   Eric Baker, Policy Manager
   Jeff Rimack, Community Development Director
September 20, 2019

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

SUBJECT: Lake Stevens Comment Letter – Draft VISION 2050 Plan

Dear Mr. Inghram,

Thank you for the opportunity to comment on the Draft Vision 2050 Plan. As a member city of Snohomish County Tomorrow (SCT), Lake Stevens acknowledges the effort required to update the regional growth framework. We appreciate PSRCs consideration and action on many of the SCT and city comments. Following the SCT letter, Lake Stevens also endorses the transit-oriented approach to concentrate growth near transportation hubs. Lake Stevens concurs with the SCT comments on local flexibility, reconciling timing of growth, annexation reform, balancing policy objectives and funding shortfalls for transportation.

A 2019 market analysis of Lake Stevens, conducted by BERK Consulting, indicates between 2010 and 2019 that the city’s population growth is the highest in Snohomish County at approximately 18% (+2% annually) and that employment growth is the second highest in Snohomish County at approximately 35% (5.7% annually since 2014). BERK also notes,

“Although Lake Stevens is sited away from the I-5 corridor, it is positioned in a strategic location as a service center for surrounding communities, including rural areas of central Snohomish County. This can provide a broader market for retail and service businesses in Lake Stevens, but also puts retail districts in competition with locations in Snohomish, Everett, and Marysville.”

Lake Stevens continues to promote an equitable distribution of growth to satellite cities and towns not connected to regional transportation spines or growth centers that function as local growth centers in their respective areas. As noted in our previous letter, “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 / attainable housing options.” Specific elements of interest to Lake Stevens follow:

Regional Growth and Collaboration

- The city supports MPP-RGS-2 for setting local population, housing and employment targets through the countywide planning process and MPP-RGS-3 that acknowledges the importance of providing flexibility in countywide growth targets that support the Regional Growth Strategy.

- The city agrees with the sentiments expressed in MPP-RGS-4, MPP-RGS-5 and MPP-RGS-6 to focus development in existing growth boundaries as a first option. However, at this point cities like Lake Stevens planning under GMA are asking for flexibility as they look toward minor expansions of Urban
Growth Areas. In the case of Lake Stevens, the city has achieved approximately 70% of its 2035 growth target – remaining areas have significant encumbrances (e.g., several major utility corridors, stream corridors, steep slopes and significant wetlands) to further intensify development.

Lake Stevens encourages PSRC to support measured Urban Growth Area expansions. Rather than intensifying allocations to outlying rural areas, growth adjustments should be concentrated along the fringes of developed urban growth boundaries, between nearby UGA boundaries and developed urban enclaves to allow efficient land development and delivery of urban services including school siting.

Environment

- Lake Stevens agrees with Vision 2050’s emphasis on environmental protection and acknowledging climate change as a policy issue. As noted in the SCT letter, there should be an ability to balance policy priorities and an opportunity for adaptive management to achieve growth targets when policies conflict with the regional growth strategy.

Development Pattern

- The city supports policies such as MPP-DP-24 that note regional growth should be concentrated around growth centers. The city appreciates the recognition that local growth centers play an important role in the regional strategy. For Lake Stevens this is especially important as the city lacks significant public transit but acts as local center for shopping to outlying communities along SR-9, SR-92 and US-2. The city has adopted three subarea plans as part of its growth strategy to compliment the regional vision.

- The city appreciates your acknowledgement of a need to reform the annexation process as described in polices MPP-DP-26 – MPP-DP-28 and Action Item DP-Action-6 to allow local jurisdictions the ability to fulfill the regional strategy. Lake Stevens looks forward to PSRC taking an active role in framing this conversation with the state legislature and other stakeholders.

Housing Diversity

- Lake Stevens agrees with an approach to provide varied and attainable housing for all residents and recommends adding language that acknowledges market factors and preferences as a part of determining the mix of local housing stocks.

Economy

- Lake Stevens supports the emphasis on a diverse economy with a job to housing balance and appreciates the acknowledgment of local centers to the regional growth strategy.

Transportation

- Lake Stevens concurs with the emphasis on multimodal travel, freight mobility and support of an integrated road system.

- The city would also like to emphasize a significant need for funding improvements to regional highways particularly US-2, SR-9, SR-204, and SR-92 that provide important commuter and freight mobility routes between regional and local growth centers and outlying communities.

- Setting aside the high capacity transit alternative, improvements to US-2 and the US-2 trestle remain regional and statewide priority for the legislature. US-2 is a major freight route across Snohomish County, Washington State and the United States. US-2 is one of the major east/west routes in Snohomish County, with one of the highest traffic counts, connecting eastern Snohomish County cities to job centers and the greater region. The US-2 Trestle is a bottleneck to east/west traffic patterns that creates significant congestion during peak hours and poses safety risks where it intersects 20th Street SE and SR-204 as described in the WSDOT Interchange Justification Report. As a high-priority project for the County and Region, direct funding needs to be designated to the US-2 Corridor to improve congestion, safety, economic development and environmental quality.
• A critical need for regional transportation coordination and funding support, outside of the I-5 corridor, will result from the new Marysville / Arlington Manufacturing Industrial Center. The development of this center will drastically change the traffic volumes and traffic patterns on SR-9 for Lake Stevens, Marysville, Arlington and connecting highways to satellite cities including Granite Falls and Monroe.

For Vision 2050 to be successful, it is imperative that communities work cooperatively, under countywide planning policies, to determine local growth targets. Following 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 when implementing the regional growth strategy. Inherent Flexibility and adaptability should remain key principles of the growth strategy that recognize changing population distribution, service areas and urban growth boundaries.

Sincerely,

[Signature]

John Spencer, Mayor

Cc: Lake Stevens City Council
September 4, 2019

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

To Whom It May Concern:

This letter relates to the draft VISION 2050 (V2050) document currently under review. Thank you for your consideration of these comments.

SUPPORT OF PCRC COMMENTS ON DRAFT VISION 2050

The City of Lakewood supports and reiterates the comments submitted by the Pierce County Regional Council regarding draft V2050. Most importantly, implementation of VISION 2040 and its planned concentration of jobs in certain areas and housing in others has not solved the worsening jobs-housing balance in the Puget Sound region; in fact, it has exacerbated it. Draft V2050 plans for the same macro-level development patterns and will further reduce the jobs-housing balance in subregions of the central Puget Sound, worsen the disparity in economic well-being among the various counties in PSRC, and worsen transportation congestion and related air quality and health concerns.

PSRC must establish policies and goals ensuring that each county plan for enough housing to accommodate job growth projections within its borders. If existing and anticipated housing demands are not addressed near the areas where jobs locate, the jobs-housing imbalance demonstrated in the V2050 DSEIS will occur as anticipated (see DSEIS Figure 4.1-1), and there will be a major internal inconsistency within V2050 between the Regional Growth Strategy and V2050’s goals.

PSRC’S ROLE IN THE REGION

Reemphasizing Lakewood’s concern about PSRC’s role in relation to local governments, included below are 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.

**PSRC’s 1993 Interlocal Agreement Mission Statement:**
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.

PSRC’s 2009 Bylaws Purpose Statement:

[E]xercise 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.

PROPOSED REGIONAL ACTIONS IN VISION 2050

As part of V2050, for the first time, PSRC is proposing to develop and lead regional actions related to Equity, Climate Change, Housing, and Open Space. This is another instance where PSRC is moving beyond its role as the regional transportation planning organization (RTPO) for the Central Puget Sound and metropolitan planning organization (MPO). Rather than adopting guidelines, principles and policies, PSRC is now proposing to adopt regional actions for which it will provide performance measures and which it will monitor:

In addition to PSRC’s regular technical assistance, plan review, and transportation and economic development planning programs, VISION 2050 identifies other actions designed to implement the multicity county planning policies and the Regional Growth Strategy. Many of the actions are identified as work items for PSRC; other actions are more appropriate for countywide or subregional groups, counties, cities, or other partners.

Some of the regional actions draft V2050 proposes include:

- Regional equity strategy: Develop a regional equity strategy to make racial and social equity central to PSRC’s work and support local comprehensive plan updates.

- Regional housing strategy: Develop a comprehensive regional housing strategy to support local comprehensive plan updates and provide the framework for regional housing assistance, including a regional housing needs assessment, best practices to promote and address housing affordability issues, and coordination with other housing efforts.

- Four-Part Greenhouse Gas Strategy: Advance the implementation of the region’s Greenhouse Gas Strategy to meaningfully reduce emissions throughout the region from transportation, land use, and development.

- Open space planning: Implement conservation, restoration, stewardship, and other recommendations in the Regional Open Space Conservation Plan.

PSRC policy boards and the Executive Board will prioritize VISION 2050 actions in
upcoming work programs and budget cycles. **PSRC will identify performance measures and regularly monitor them after VISION 2050 is adopted.** The plan also identifies actions for PSRC to communicate with the state Legislature on important regional implementation steps for VISION 2050.

(Emphasis in bold added.)

These proposed regional actions exceed the scope and authority for PSRC per RCW Chapters 36.70A and 47.80 as well as the Mission and Purpose expressed in PSRC’s Interlocal Agreement and Bylaws, and should not be included within V2050. Cities are autonomous governmental entities (in Lakewood’s instance, a code city per RCW Title 35A) and have been given the authority to govern (see, e.g., RCW 35A.11.020) within their borders.

Within the draft V2050 Vision at page 1, the following statement is included:

**Equity. All people can attain the resources and opportunities to improve their quality of life and enable them to reach their full potential.**

Draft V2050’s discussion of “equity” continues at page 5:

**Recognizing that growth will put pressure on communities, VISION 2050 also seeks to reduce the risks of displacement of lower-income people and businesses through elevating social and racial equity in regional planning and encouraging integration of equity in local plans. PSRC will collaborate with its members and community partners to develop a regional equity strategy to advance this work and create and maintain tools and resources to better understand how regional and local policies and actions can address inequities.**

Lakewood requests that if social and racial equity is retained as a goal and/or regional action within V2050’s construct, that PSRC incorporate “equity” into its review and certification of local comprehensive plans. There are jurisdictions and subregions within PSRC that have historical and current policies and development codes that have resulted and result in displacement, exclusion, and inequitable access to housing, jobs, and quality of life. In addition, the jobs-housing balance currently proposed by the preferred Regional Growth Strategy alternative will result in continued social and racial inequity (please see discussion of jobs-housing balance above and in the PCRC comment letter.)

**REGIONAL GROWTH STRATEGY**

Draft V2050 includes a range of population numbers for several regional geographies in Pierce County with a footnote for Figure 6 that states “additional countywide discussion [is] needed to finalize allocations.” Lakewood supports the following population allocations as responsive to both V2050’s vision and goals but also real development patterns and vested projects in the various geographies:

- Metro Cities 38%
- Core Cities 23%
- HCT 14%
- Urban Unincorporated 15%
- Cities & Towns 7%
- Rural 3%
MAJOR MILITARY INSTALLATIONS IN V2050
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 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.”

Lakewood requests inclusion of the amendments to draft V2050 related to Major Military Installations, including new MPPs, as presented in the comment letter from the Pierce County Regional Council.

Lakewood also recommends the following edits to language in draft V2050 at page 39 in order to recognize the range of personnel employed at the various installations:

“Major Military Installations are defined by PSRC as installations with more than 5,000 active duty and civilian personnel enlisted and service personnel.”

INFRASTRUCTURE PLANNING
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.

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.

Thank you for the opportunity to provide comment on draft VISION 2050.

Sincerely,

Don Anderson, Mayor

CC:
Deputy Mayor Jason Whalen
Councilmember Paul Bocchi
Councilmember Marie Barth
Councilmember Mary Moss
Councilmember Mike Brandstetter
Councilmember John Simpson
September 16, 2019

Puget Sound Regional Council
Paul Inghram, AICP, Director of Growth Management
Erika Harris, Senior Planner

RE: Mercer Island Comment on Draft VISION 2050

Dear Puget Sound Regional Council, Mr. Inghram, and Ms. Harris:

The City of Mercer Island City Council, Planning Commission, and staff have reviewed the Draft VISION 2050 plan; the City Council and Planning Commission held a joint study session to review the Draft VISION 2050 plan and its implications for Mercer Island on August 20, 2019. Mercer Island City Council members are actively engaged with the King County Growth Management Planning Council and Sound Cities Association. The purpose of this letter is to provide specific comments from the City of Mercer Island, as informed by the August 20, 2019 Mercer Island study session.

The City of Mercer Island supports the overall goals and policy direction established in the Draft VISION 2050 plan. The purpose of this letter is to provide specific comments from the City of Mercer Island on the Draft VISION 2050 plan.

Local Implementation
VISION 2050 establishes a regional growth strategy to accommodate forecasted growth in the four-county region. Consistent with the Growth Management Act, the City of Mercer Island supports the creation of additional countywide tools that consider local circumstances in establishing local growth targets and implementation strategies. In particular, the City recommends that VISION 2050:

- Include the creation of countywide process to set locally tailored growth targets that are consistent with the Regional Growth Strategy;

- Include policies that support cities in exercising discretion in making choices about accommodating growth; conversely, avoid regional growth policies that represent a “one-size-fits-all” solution to accommodating growth.

Financial Constraints
VISION 2050 should directly address the financial challenges faced by counties and cities and associated with the implementation of the regional growth strategy. Current revenue sources (for Mercer Island and similarly situated cities) to implement VISION 2050 are insufficient to support necessary planning efforts to implement the regional growth strategy. Similarly, current revenue sources are insufficient to support the infrastructure improvements that would be necessary for the extent of development called for by the VISION 2050 regional growth strategy.

1 RCW 36.70A.110(2)
growth strategy and are insufficient to support ongoing maintenance and operations of existing infrastructure designed to accommodate the last 30 years of growth.

Mercer Island recognizes that this challenge cannot be directly addressed by the Puget Sound Regional Council. The City recommends that VISION 2050 incorporate policies that support regional and local efforts to develop state legislation to provide new fiscal tools for implementation of Growth Management Act related actions (i.e. state revenues to support unfunded planning and infrastructure expenditures). Without such state legislation, implementation of the regional growth strategy VISION 2050 plan is in jeopardy.

Mercer Island’s Unique Constraints
The draft VISION 2050 plan reflects a regional growth strategy that seeks to leverage the region’s investment in a regional transportation system, by focusing population and job growth near regionally funded transit centers. As noted above, the City of Mercer Island supports the regional growth strategy in concept however Mercer Island also faces significant hurdles in accommodating additional population and job growth.

Mercer Island is bounded entirely by Lake Washington, with no additional “undeveloped land” and is encumbered with substantial critical areas including steep slopes, wetlands, watercourses and shorelines. In addition, Mercer Island faces significant costs to upgrade infrastructure to support significant additional redevelopment on the island. Furthermore, Mercer Island’s proximity to two high growth metropolitan cities, which have accommodated a high proportion of job growth that in turn drives housing demand, make affordable housing solutions on Mercer Island challenging to implement. Finally, to accommodate the Sound Transit station, Mercer Island has lost one of its few freeway access points; which, in combination with forecasted growth for high capacity transit cities may result in significant transportation congestion and delays. In a review of other high capacity transit cities, Mercer Island appears to have unique and significant challenges in implementing the multi-county planning policies contained in VISION 2050.

Consequently, the City recommends that VISION 2050 regional growth strategy acknowledge that the City of Mercer Island, while a high capacity transit community, is effectively built out and cannot accept further significant population or job growth.

In closing, the City of Mercer Island recommends that the draft VISION 2050 plan address the: A) local implementation; B) financial constraints; and C) Mercer Island constraints on accommodating additional growth.

If you have questions or comments regarding the contents of this letter, please contact me at 206.275.7732.

Regards,

Evan Maxim
Director of Community Planning and Development
City of Mercer Island

Copy: Mercer Island City Council
Mercer Island Planning Commission
Interim City Manager Jessi Bon
September 12, 2019

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

Dear Mr. Inghram:

The City of Mill Creek (City) recognizes that preparing a 30-year plan to accommodate the anticipated growth in the Puget Sound region by 2050 while maintaining and improving the quality of life for existing and future citizens presents monumental challenges. In that spirit, the City appreciates the work that has gone into the preparation of the Draft Vision 2050 plan and the opportunity to provide comments.

Overall, the City supports the Draft Vision 2050 Plan, which is based on the Transit Focused approach that was evaluated in the SEIS. The City believes that it makes sense to place the bulk of future growth along the existing and planned high capacity transit routes. We are pleased that the existing unincorporated areas within the Urban Growth Areas along existing and planned high capacity transit are now included within the areas identified as High Capacity Transit (HCT) Communities and have been identified as areas for more dense development, although we have concerns as noted below.

The City notes that the difficulty will be implementing the Plan in an equitable way that maintains and even improves the high quality of life enjoyed by our residents and businesses. Predicting how and where growth actually occurs is difficult. Employment and population growth has not necessarily occurred as planned under Vision 2020 and Vision 2040. We agree with the statement on page 3 of Vision 2050 that “business as usual will not be enough” to accommodate the growth anticipated in the region. We believe significant changes to state laws, including adjustments to the Growth Management Act (GMA) and overhauling annexation processes may be required to bring the plan to reality.

The City supports the comments being submitted by the SCT Steering Committee. In addition, the City of Mill Creek provides the following comments/suggestions:

- **Need for flexibility in accommodating future growth targets** - In Snohomish County, the land use plans and zoning currently do not collectively have the capacity to accommodate the population and employment targets for the HCT Communities. While the extent of the deficit is unknown at this time, each jurisdiction has unique circumstances that will present challenges to accepting additional growth, including the condition of existing housing stock, the availability of vacant and/or underdeveloped land suitable for development, the availability/timing of high capacity transit and other infrastructure, and
other market factors. As a result, local jurisdictions need to have the flexibility and authority to prepare plans that accommodate the anticipated growth in a manner that takes these unique conditions into account.

• **Need for infrastructure necessary to support anticipated growth** – To successfully accommodate the land use patterns envisioned in Vision 2050, a commitment to providing the transportation and other public infrastructure in a timely manner must be secured. Allowing increased densities without the necessary infrastructure in place is the primary threat to the quality of life for our existing and future residents, and will spoil the appetite of the region’s residents for increased densities moving forward. Long-term and dependable funding commitments for infrastructure has proven difficult in the past. An action step should be added to Vision 2050 that directs PSRC to communicate and work with appropriate political bodies/agencies to seek long-term funding mechanisms necessary to provide the infrastructure to support the anticipated growth.

• **Need to adopt realistic and practical standards for reducing greenhouse gasses and other air and soil toxins consistent with state law** – MPPs En-3 and CC-1 call for the reduction of greenhouse gasses and other pollutants, which is a goal that everyone can agree on. However, requiring actions to improve air and water quality, soils, and natural systems “where possible” (En-3), and calling for meeting “targets and goals” set by state, regional, national governments and the Puget Sound Clean Air Agency (CC-1), may not be realistic or practical given the competing challenges of accommodating growth addressed in Vision 2050. Many actions may be possible, but may not be practical. It is our opinion that the language in the subject policies should be changed to require actions to reduce the emissions of greenhouse gasses and/or other toxins as required by state and federal law.

• **Need for adequate emergency management plans and services to accommodate future growth** - The increased population in the Puget Sound region anticipated in Vision 2050 presents a sizable challenge for preparing and implementing emergency management plans and providing services. As acknowledged in Vision 2050, the region is susceptible to earthquakes, landslides, and wildfires. Vision 2050 does include a policy (MPP-PS-19) to “support” efforts to increase the resilience of public services, utilities, and infrastructure by preparing for disasters and other impacts and coordinated planning for system recovery. However, we believe that this language should be stronger to “ensure” that adequate emergency management plans and services will be in place to safely accommodate the land use patterns envisioned in Vision 2050.

• **Need to improve the jobs/housing ratio for Snohomish County** – The existing unbalanced jobs to housing ratio leads to a high volume of commuter traffic to and from Snohomish County into King County and beyond, contributing to air pollution, traffic congestion, and a decreased quality of life for commuters and their families. The City of Mill Creek
appreciates the allocation of more jobs to Snohomish County, which will improve the County’s ratio of jobs to housing. This being said, there is still more work to be done to increase the ratio of jobs to housing in Snohomish County.

On behalf of the Mill Creek City Council, thank you for the opportunity to provide comments on Vision 2050. The steps the region takes today will determine whether or not we are successful in maintaining the high quality lifestyle afforded in the region.

Respectfully,

Pam Pruitt
Mayor
September 13, 2019

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

SUBJECT: City of Monroe Comments on the July 19, 2019 Draft VISION 2050 Plan

Dear Mr. Inghram,

The City of Monroe appreciates the opportunity to submit comments on the July 19, 2019 draft VISION 2050 plan. We understand the level of effort elected officials and staff have taken to develop the region’s draft plan for future growth. We look forward to working with the Puget Sound Regional Council and Snohomish County to do our part to successfully implement the plan once it is adopted.

The City of Monroe supports the following VISION 2050 polices and suggests additional enhancements that will help ensure successful implementation of the proposed goals and policies:

Regional Collaboration Policies
- The City of Monroe supports the development of a Regional Equity Strategy (RC-Action-3). We applaud PSRC for the inclusion of MPP-RC-2 which seeks to improve services and access to opportunity for people of color, low income residents, and underserved communities. The 2018 Central Puget Sound Demographic Profile (Map 6, page 25) shows many of the region’s poorest communities are located in cities and towns located furthest away from Seattle along the Cascade foothills and away from major transportation corridors. In contrast, the region’s wealthiest communities are located in urban centers along the I-5 corridor where future regional investments are proposed. The City of Monroe is concerned the Regional Growth Strategy, which concentrates investment adjacent to future High Capacity Transit Communities, will widen the gap between urban wealth and rural poor.

The City of Monroe suggests amending MPP-RC-2 and MPP-RC-8 as follows to clearly recognize the need to provide access to jobs, multi-modal transportation services, and policy-making for the region’s rural residents with low incomes:

  o MPP-RC-2: Improve services and access to opportunity for people of color, people with low incomes, and historically underserved communities in urban areas and any rural area served by free-standing cities and towns, to ensure all people can attain the resources and opportunities to improve quality of life and address past inequities.

  o MPP-RC-8: Recognize and give regional funding priority to transportation facilities, infrastructure, and services that explicitly advance the development of housing in designated regional and local growth centers. Give additional priority to projects and services that advance affordable housing in urban areas and free-standing cities and towns.
The City of Monroe supports the language included in RC-Action-3 on page 20, which calls for developing a regional equity strategy intended to make equity central to PSRCs work and to support the 2023/24 local comprehensive plan updates. While displacement and gentrification caused by economic growth is a problem predominantly affecting urban areas, the impacts are felt acutely by free-standing cities and towns and rural areas whose residents generally lack access to good-paying jobs and adequate connectivity to public mass transportation systems. In order to ensure the strategy looks beyond the urban core and evaluates the needs of people of color and low income residents living in free-standing cities and towns and those rural areas that they service, the City of Monroe recommends modifying the RC-Action-3, as follows to include analysis of needs of all people of color and low income residents regardless of whether they are urban or rural residents:

- Creating and maintaining tools and resources, including data and outreach, to better understand how regional and local policies and actions affect our region’s residents, specifically as they relate to people of color and people with low incomes in urban and rural areas.

- Evaluating how transportation and growth policies centered in High Capacity Transit Communities affect access to economic growth and prosperity for individuals living in the region’s rural areas and free-standing cities and towns.

We also support efforts by the PSRC committees and governing body to hold planning and policy meetings outside of Seattle and King County. This will further the goals of including people of color, people with low incomes, and historically underserved communities in Kitsap, Pierce, and Snohomish Counties in policy-making decisions, as supported by MPP-RC-2 and RC-Action-3.

### Regional Growth Strategy Policies

- The City of Monroe is deeply concerned with Snohomish County’s completion of the Southwest Urban Growth Area Boundary Planning Study. The Boundary Planning Study purports to consider regulations and policies that may need to be satisfied, or amended, to adjust UGA boundaries within the study area to meet future growth needs. The Study Area is designated “rural” in the Regional Growth Strategy. The cities of Bothell, Monroe, and Snohomish have met less than 30% of their 2035 growth targets, indicating that each of the geographies has capacity remaining for additional population. Therefore, amending the UGA is unnecessary because future housing demand can be accommodated by capacity remaining within existing urban areas instead of land supplies within the Southwest UGA. The area is neither located near high capacity transit nor served by Community Transit or other bus services; and would need to densify considerably to support cost-effective bus service. The City of Monroe is very concerned the Boundary Planning Study will be used to justify increased densities or change land use designations in response to development pressures. We strongly oppose any efforts to increase densities in the planning study area.

- The City of Monroe supports the growth allocation in the Regional Growth Strategy for the rural and urban unincorporated areas of Snohomish County as long as the growth is directed to areas with enough existing and vested vacant lots to accommodate allocated growth. The Regional Growth Strategy should not be used to justify creative measures such as UGA “land swaps” to amend or expand the Urban Growth Area into rural areas where vested vacant lots are not already in place.
- The City of Monroe supports Regional Growth Strategy polices, which accommodate the region’s growth first and foremost into the urban growth area (MPP-RGS-4); Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high-capacity transit (MPP-RGS-11); Plan for commercial, retail, and community services that serve rural residents to locate in neighboring cities ...to avoid the conversion of rural land into commercial purposes (MPP-RGS-12); and Manage and reduce rural growth rates overtime...to maintain rural landscapes and lifestyles and protect resource lands and the environment(MPP-RGS-13).

- The City of Monroe recommends strengthening RGS-Action-4 on page 46 to better reflect the Draft Preferred alternative, as follows:

Regional Growth Strategy: As counties and cities update their comprehensive plans in 2023-24 to accommodate growth targets and implement the Regional Growth Strategy, support a full range of strategies, including zoning and development standards, incentives, infrastructure investments, housing tools and economic development, to achieve a development pattern that aligns with VISION 2050 to reduce rural growth rates over time and focus growth in cities.

**Development Patterns**

The City of Monroe applauds the effort in VISION 2050 to acknowledge and remedy historic inequities that have kept many low-income residents and people of color from accessing opportunities to improve their quality of life. Figure 22 – Opportunity Map on page 71 clearly identifies areas outside the urban core and I-5 corridor as experiencing the lowest “access to opportunity”.

The City of Monroe believes it is appropriate to add a separate subsection, policies, and additional action or actions in the Development Patterns chapter to affirmatively recognize the role free-standing cities and towns play in providing access to transportation and economic opportunity to rural and unincorporated urban areas. This is particularly important as the growth patterns shift to transit-oriented development and High Capacity Transit Communities. Funneling transit access and infrastructure investment to urban areas may further widen the opportunity gap in rural areas and free-standing cities and towns.

The City of Monroe recommends amending DP-Action-3 as follows consistent with MPP-DP-30:

- **Transit-Oriented Development**: PSRC, together with its member jurisdictions, will support member jurisdictions in the implementation of the Growing Transit Communities Strategy and compact, equitable development around high-capacity transit station areas. This action will include highlighting and promoting tools used to support equitable development in high-capacity transit station areas and promote transit service between high-capacity transit station areas and free-standing cities and towns.

The Development Patterns goals outlined in Vision 2050 recognize the important role the Growth Management Act plays in focusing growth in urban areas that include housing choices, workplaces, retail, and services. Monroe, and other free-standing cities and towns, support local industrial, professional, and retail employment centers. These centers, outside the I-5 corridor, offer important choices for regional, national, and global companies including Werner Paddle, Canyon Creek Cabinet Company, Natural Factors, and Damar Aerosystems. We support DP-Action-2 to inventory industrial lands throughout the Central Puget Sound including those located within free-standing cities and towns.
Economic Development
We appreciate the newer emphasis areas PSRC has adopted to include specific rural strategies, initiatives to grow jobs throughout the region, and advancing social equity and affordable housing. The city strongly supports economic policies that place people at the center and promote equitable access to opportunity for all the region’s residents.

The Regional Economic Strategy calls for “advancing economic development within rural communities”. The Strategy recognizes the important role free-standing cities and towns play as job centers outside the I-5 corridor. Providing jobs in free-standing cities and towns, adjacent to affordable housing, helps the region achieve a better jobs/housing balance. We applaud the emphasis on supporting industrial centers outside the I-5 corridor.

The City is surprised the Economy Policies do not specifically call out broadband infrastructure as a priority. People throughout the Puget Sound are increasingly working from home for themselves and for companies across the globe. Last year, over 5% of the workers in the US worked from home. Anecdotal evidence indicates an increasing number of residents in free-standing cities and towns are working remotely. This is a growing national trend1. The region will never achieve its goal as an economic leader of the future without adequate broadband service.

The region’s economic strategy Amazing Place specifically calls out investment in broadband infrastructure: “In particular, access to broadband infrastructure is needed throughout the region. Speeds and access that encourage economic development are needed in both underserved areas but also even in very developed parts of the region. Infrastructure must be expanded to reach areas with limited broadband access and capacity improved in rapidly developing metropolitan areas”.

Remote work conducted via a robust broadband infrastructure can help ease reliance on the region’s stressed transportation system and reduce greenhouse gas emissions. Investing in infrastructure that assists people working from home can reduce congestion and travel delay times seen in the region over the past decade. The City recommends adding a new Economy Policy to address the importance of broadband service in our economy:

- Expand access to broadband Internet access throughout the region.

Transportation
We are concerned the Regional Growth Strategy is built around the concept that additional transportation infrastructure and services will be prioritized for areas expected to accommodate the most growth along the I-5 corridor. This approach overlooks the 2018 Central Puget Sound Demographic Profile (Map 6, page 25) and Figure 22 – Opportunity Map on page 71, that many of the region’s poorest communities are located along the Cascade foothills outside the I-5 corridor.

We support MPP-T-9 which broadens transportation investments to: “implement transportation programs and projects that provide access to opportunities while preventing or mitigating negative impacts to people of color, people with low incomes, and people with special transportation needs.” Monroe supports investments in transportation networks consistent with the Regional Growth Strategy that support continued growth in local centers outside the I-5 corridor. Monroe is situated at the nexus

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1 Workers are fleeing big cities for small ones — and taking their jobs with them
People who do their jobs from home, freelance or frequently travel for work are fueling a renaissance in American cities that lie outside the major job hubs. Read in The Wall Street Journal: https://apple.news/Ajzti6ImRmqlRvMcc4k8Qg
of U.S. Highway 2, State Route 522, and State Route 203. Residential, commercial, and retail growth has occurred organically in Monroe as a result of city's location at the intersection of major transportation networks. The City of Monroe recommends amending MPP-T-19 as follows to highlight the importance of investing in transportation networks that serve local growth centers:

- **MPP-T-19** “Design transportation programs and projects to support local and regional growth centers and high-capacity transit station areas.

Transportation investments in line with growth expectations are important to keep the City of Monroe and other free-standing cities and towns connected to the regional economy. We are apprehensive the Transportation Strategy over emphasizes investments within the urban core while specifically limiting investments in the roadway systems between the urban core and free-standing cities and towns. We understand and support limiting growth in designated rural areas, and to having strong commitments to access management in place prior to authorizing capacity expansions. We want to ensure these policies will not be used to forego investments along State Routes and highways necessary to connect free-standing cities and towns. The City of Monroe suggests the following changes to MPP-T-22 to address these concerns:

- **MPP-T-22**: “Avoid construction of major roads and capacity expansion on existing roads in rural and resource areas. Where increased roadway capacity and safety improvements are warranted to support safe and efficient travel through rural areas and connect free-standing cities and towns, appropriate rural development regulations and strong commitments to access management should be in place prior to authorizing such capacity expansion in order to prevent unplanned growth in rural areas.”

**Infrastructure and Services Funding**

Since the inception of GMA, it has become more difficult for local jurisdictions to raise revenue to fund appropriate infrastructure and services. The city supports Snohomish County Tomorrow (SCT) in requesting changes to VISION 2050 to include a strong discussion of these challenges. In addition, we agree with the recommendation put forth by SCT to add an action step to VISION 2050, which directs the PSRC to communicate and work with the legislature to seek increased funding mechanisms for local governments.

Thank you again for the opportunity to provide feedback on the July 19, 2019 draft of VISION 2050. The City of Monroe appreciates the opportunity to share recommended changes that will further strengthen VISION 2050. If you have any questions about any of these comments please do not hesitate to contact Community Development Director, Ben Swanson at 360-794-7400.

Sincerely,

Kevin Hanford, Mayor Pro-Tem

cc: Monroe City Council
Ben Swanson, Community Development Director
August 28, 2019

Councilmember Ryan Mello
Chair, Growth Management Policy Board
Puget Sound Regional Council

Councilmember Mello and Puget Sound Regional Council,

The City of North Bend appreciates the opportunity to submit comment on the draft Vision 2050 Plan. This letter supplements the letter that North Bend sent to PSRC on April 23, 2019 regarding Vision 2050 growth options, and our earlier March 19, 2018 letter regarding the Vision 2050 Scoping.

While we recognize and support the great planning principals embodied in Vision 2050, we wish to provide some suggested edits to the Regional Growth Strategy section of the document.

This letter follows largely from the same vein of thought as that of the City of North Bend’s prior letters - specifically that all cities planning under the Growth Management Act need to plan for urban densities consistent with the Act, and that housing and employment growth targets for such cities must accordingly only be understood as minimum growth targets and not be construed as ceilings.

The last round of comprehensive plan certifications under Vision 2040 resulted in a number of smaller cities including North Bend receiving conditional certification based on an interpretation by PSRC of growth targets as ceilings, which took needless time and effort for all parties to work through to achieve full certification. We are concerned that the language in the Regional Growth Strategy section of the draft Vision 2050 may again be used to justify viewing growth targets as ceilings for certain smaller cities. We therefore request the following specific edits within the Regional Growth Strategy section of Vision 2050.

1. Throughout the Regional Growth Strategy section (and entire Vision 2050 Plan): wherever growth targets are referenced, ensure that they read “minimum growth targets.”

2. p. 27, last sentence of the last paragraph, redlined as follows:
   Within each county, to ensure planning consistent with the Growth Management Act, minimum growth targets will be established for the relative distribution of growth to individual cities and unincorporated places will be determined through countywide target-setting, taking into account local circumstances.

3. p. 34: Cities and Towns section. Certain sentences redlined as follows:
   Cities inside the contiguous urban growth area will likely receive a larger share of growth due to their proximity to the region’s larger share of cities, existing and planned transportation systems, and other supporting infrastructure. Small residential towns have limited potential for accommodating growth and are likely to receive a lesser share of cities and towns growth. Free standing cities and towns are separated from the contiguous urban growth area and should serve as hubs for relatively higher-density housing choices and as job and service centers for surrounding rural areas. These cities should be the focal points of rural-based industries and commerce and the location of schools and other institutions serving rural populations. Due to their physical isolation from the rest of the designated urban growth area, they will likely receive a lesser overall share of growth and are not expected to grow as much as cities and towns in the contiguous urban growth area.
The idea of jurisdictions “receiving” a share of growth doesn’t work in reality. The market is ultimately what determines demand for growth, not some sort of artificial allocation through assigned targets – people will live where they choose. The entire Puget Sound Region has a booming economy and therefore needs to plan for appropriate urban densities and urban services within cities. Considerable growth is occurring within smaller cities throughout the Puget Sound Region. Assigning low targets for growth within smaller and free-standing cities will not mean that demand for housing or employment in such areas will go away.

There is no legal basis for restricting or metering growth under current state law. North Bend is within an urban growth area as established under the Growth Management Act and is mandated to plan for and deliver urban services such as sewer, water, streets, sidewalks, and parks. Any attempt to construe growth targets as ceilings and limit growth within an urban growth area is not only counter to the Growth Management Act, it is just bad planning.

If targets are understood as serving as ceilings for certain smaller cities, this is akin to asking them to plan for low-density, auto-oriented development, completely contrary to goals and policies within Vision 2050 and contrary to the Growth Management Act.

Furthermore, cities with lower growth targets should in no way be punished for accommodating residential or employment growth that exceeds those minimum targets by way of reduced eligibility for grants and loans available through PSRC. Transportation and infrastructure grants and loans are critical to being able to plan for such growth and ensure concurrency requirements are met.

Rather than trying to play SimCity with where growth occurs within the urban growth areas of the region, the focus of the Regional Growth Strategy should be ensuring good land use planning within all cities and urban growth areas in support the policies of Vision 2050 and the Growth Management Act – compact, pedestrian-oriented development, densities that help to support transit and reduce single-occupant vehicle use, densities which support more affordable housing choices for all segments of the population, and appropriate employment growth to support a healthy jobs/housing balance within each jurisdiction.

Implementing these important policies are not possible under growth ceilings, which will only increase housing costs and result in these communities becoming wealthy bedroom enclaves with a poor jobs/housing balance. Vision 2050 needs to be explicit that housing and employment targets are minimums that jurisdictions need to plan for. Whether that growth then occurs is up to the market.

The redline edits we have suggested above will help to ensure that Vision 2050 articulates targets consistent with the intent of the Growth Management Act, and will not be used as a tool to artificially limit residential or employment growth within certain smaller cities.

We thank you again for the opportunity to provide these comments and look forward to continuing to work with PSRC as you continue to refine the draft Vision 2050, and ultimately implement the final plan.

Sincerely,

Ken Hearing – Mayor, City of North Bend
September 16, 2019

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

Re: Draft Vision 2050 Comments

Dear Mr. Brown:

The adoption of Vision 2040 in May 2008 began a new era of land use planning that is unique to the Puget Sound Region. Through the implementation of this new regional plan, the Puget Sound Regional Council expanded its influence on local comprehensive planning and local decision making. For the past 10 years Pierce County elected officials and staff have participated in regional planning efforts, studies, and other relevant activities to share our perspective and try to advance our position(s). It has been frustrating at times as “regional” policy makers question our requests when they have not had the same experience or circumstance as we have in Pierce County.

As the July draft Vision 2050 document (DRAFT) is the first opportunity we have had to review both the background text and policies, we continue to have concerns with how the region’s story is being told, the lack of clarity on what local jurisdictions are expected to do through their next GMA periodic update, and the aspirational nature of the Regional Growth Strategy.

The requests at the top of our list are to:

- Incorporate additional information and policies to address an equitable Housing/Jobs Balance across the region;
- Incorporate additional information and policies to address the role of Major Military Installations; and,
- Ensure that the population growth targets for Pierce County unincorporated geographies identified in the Regional Growth Strategy (RGS) are realistic and achievable.

Pierce County asks that you refer to the Pierce County Regional Council’s letter for the specific requests associated with the Housing/Jobs Balance and Major Military Installations topics.

Regional Growth Strategy

While PSRC staff presented its recommendation to the Growth Management Policy Board for specific growth targets in the RGS, the current draft RGS instead identifies a range of growth for 5 of the 6 Pierce County geographies. A footnote to RGS states, “Ranges provided for Pierce County – additional county discussion needed to finalize allocations.” The County is supportive of such discussions and has been
actively engaging one of its local partners, the City of Tacoma, in this regard. The County is optimistic that specific targets for the Urban Unincorporated and Rural geographies, rather than a range, can be finalized prior to the Growth Management Policy Board’s final action on the draft plan later this year. Pierce County will, however, continue to insist that the growth targets contained in the RGS be grounded in reality. The County strongly believes that the targets that are ultimately adopted must be realistic and achievable. To do anything less than that would be a disservice to the public and would obscure the challenges being experienced across the regional as a result of growth and market conditions.

Pierce County believes that the likely population growth for the Urban Unincorporated geography over the next 33 years will be much closer to 60,000 persons than to 41,000 persons. Data supporting this position has previously been submitted to PSRC and has been compiled in Attachment A to this letter. To illustrate the growth reality of the unincorporated urban area, Pierce County recently completed an analysis of residential growth that has occurred in this area between January 1, 2017 and December 31, 2018. This analysis found that permits for 3,018 single family and multifamily residential units were approved during that time period, representing population growth of approximately 7,550 persons (based on 2.5 persons per household). This increase equates to 18 percent of the proposed low-end growth target for the Urban Unincorporated geography currently contained in the draft RGS. Given these facts, if the RGS should continue to set forth a population range for the Urban Unincorporated geography as Vision 2050 moves forward, Pierce County requests that the range be set at 50,000 to 60,000 persons.

Pierce County also has concerns regarding the population target for the Rural geography and again refers the PSRC to the data contained in Attachment A to this letter. Pierce County believes that the low-end target of 11,000 is simply not realistic. Growth in the Rural area is occurring in a manner that complies with the Growth Management Act, nonetheless the growth trend and existing available capacity indicate population growth will certainly exceed 11,000 persons over the 33-year period. Pierce County believes that the only way to limit population growth in the Rural area such that the low-end target is achieved is to acquire a significant number of development rights from rural property owners. Pierce County lacks the funds to accomplish this and would be dependent upon funding from the four-county region for such an approach to be successful. Consequently, if the PSRC sets the Rural geography population growth target at less than 22,000 persons, Pierce County requests that a policy and action step be included that supports the establishment of a regional funding source which would be used to acquire conservation easements within rural areas. Such an approach is likely the only mechanism that can mitigate the property right impacts associated with limiting private property use in a manner that achieves the growth targets envisioned for the Rural geography.

**Multicounty Planning Policies**

In addition to the RGS, Pierce County has concerns regarding the organization and content of the Multicounty Planning Policies. At a high level, Vision should separate out policies that PSRC is asking local governments to consider as Countywide Planning Policies (CPPs), local comprehensive plans, and development regulations are updated from those directed toward regional decision making. Vision states that the “The multicounty planning policies provide overall guidance and direction for planning processes and decision-making at regional and local levels.” However, Vision does not distinguish between policies written to assist with regional decision making vs. those to be considered at the local level. As an example, MPP-RC-2 and RC-8 are clearly high-level statements about how PSRC prioritizes regional transportation funding. However, these policies are mixed in with policies to be considered as Plans are updated.
Distinguishing who is responsible for implementing each individual MPP would provide additional clarity.

Vision goes on to say that “…the full body of multicounty policies is to be considered in decision-making for various programs, projects, and planning processes”. Pierce County asks that PSRC highlight those policies that local governments are to consider as CPPs are amended.

The proposed policies include direction to local jurisdictions that is already required through either the Growth Management Act or other State requirements. An example being MPP-DP-32 which states, “Do not allow urban net densities in rural and resource areas.” While Pierce County supports the intent of these type of policies, it is unnecessary and perhaps misleading to include them in Vision 2050. The inclusion of these policies does not add any value to the regional plan as they are already required by GMA. As a casual reader may not be aware GMA requirements, it would be more appropriate to provide a more detailed discussion of the requirements and remove all policies that are redundant with GMA. Reducing the number of unnecessary policies will allow the policies to focus on regional collaboration.

Pierce County also has concerns with other proposed policies that inhibit our ability to meet our responsibilities under the Growth Management Act and take actions that would create a better quality of life for existing and future residents and set desirable outcomes for property and business owners. The County has identified its requested policy changes in Attachment B.

**Conclusion**

Pierce County has attempted on multiple occasions to convey its concerns regarding the draft RGS, the region’s housing/jobs balance, and certain draft policies. Pierce County has also advocated for regional recognition of major military installations. While some positive dialog has occurred, the draft Vision 2050 document does not adequately address our concerns. Pierce County further explains its concerns in this letter and provides data to support changes to the RGS and Multicounty Planning Policies. Our requests reflect the necessity to have a realistic growth pattern achieved through 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. Pierce County asks that its partners across the region take the time to understand Pierce County’s concerns and to support the changes to Vision 2050 requested in this letter.

Sincerely,

Bruce F. Dammeier
Pierce County Executive

Douglas G. Richardson
Chair, Pierce County Council
Attachment A
Regional Growth Strategy

Overview
Through the Draft Supplemental Environmental Impact Statement (DSEIS) Pierce County requested the 33-year population growth associated with the Pierce County Unincorporated Urban Area Geography to be roughly 80,000 and 30,000 within the Rural Geography. Our request reflects our position that the growth alternatives presented in the DSEIS were unrealistically low. In response to our request, PSRC staff presented the Growth Management Policy Board with a comprise – growth of 60,000 people within the urban area and 22,000 within the rural. The increase in Pierce County’s number necessitated modification to other Geographies within Pierce County. While these growth numbers are significantly lower than our request, we voiced our support for them. We believe this comprise reflects a more realistic outcome. This belief stems from information that our staff provided to PSRC related to vested projects in the urban area and parcel information related to the rural area.

Unincorporated Urban Geography
As illustrated below, Pierce County has 80 of vested projects that encompass 15,458 vested lots within the Unincorporated Urban Area Geography. These units will represent between 38,650 and 40,200 people. This number practically equals the low end of the range as presented in the Draft – 41,000 growth. It is unrealistic to assume that there won’t be other future projects within Pierce County’s urban growth area that will generate additional single-family lots or multi-family units. An increase from 40,000 to 60,000 people represents an additional 242 units per year above the already vested projects. This is not an unrealistic expectation given the existing mixed-use zoning, redevelopment opportunities, and underutilized single-family parcels within the urban growth area. In addition, the comprise as presented by PSRC staff represents a significant decrease in growth as compared to the past 17 years. As illustrated in the graph below, the Pierce County Unincorporated Urban Geography accommodated over 40 percent of the entire county’s growth between 2000 and 2017. The high end of the proposed range reduces the growth by more than half. Even the proposed higher number represents a significant shift in growth patterns.

Rural Geography
As illustrated in the tables below, there are approximately 12,700 vacant properties within the Rural Geography. These parcels range in size from less than 5 acres to more than 20 acres in size. Since the beginning of 2017, the County has accepted or approved 92 applications in the rural area that represents the creation of 262 parcels. The potential population growth associated with the existing vacant parcels and new parcels is roughly 35,000. This estimate assumes none of these parcels would be further divided. It should also be recognized that there is additional development potential of large properties that have existing structures and could be further divided at rural densities. In consideration of these properties, it needs to be recognized that the population capacity in the rural area in much greater than the 35,000 associated with the vacant properties. This potential growth in the Rural Geography is significantly greater the growth range presented in the Draft, between 11,000 and 22,000.
As illustrated below, the Pierce County Rural Geography accommodated approximately 16 percent of the entire county’s growth between 2000 and 2017. The high end of the proposed range reduces the growth by more than half. In looking forward to a realistic growth number, you need to consider the population growth that has occurred since 2017, as well as a comparison of the past growth rates. In recognition of building permits that have been approved, the population in the Rural Geography has grown by approximately 3,000 since 2017. This represents more than ¼ of the low-end population growth number. The adoption of the low-end growth number – 11,000 – would correlate to an annual average housing unit growth of only 98 units. Given the historic trends and the development capacity of existing rural properties, this low average is unrealistic to expect.
SUMMARY OF VESTED PLATS
Within
Unincorporated Urban Pierce County

There are 97 single-family developments in the pipeline for Pierce County with 15,458 lots across vested developments. The estimated population for currently vested projects outside the Tacoma PAA alone would likely exceed the low population projection:

\[
2.5\text{-person household} \times 15,458 \text{ units} = 38,645 \\
2.6\text{-person household} \times 15,458 \text{ units} = 40,190.8
\]

Mid-sized plat developments are in the pipeline throughout the County. The largest projects in the pipeline are outside potential annexation areas, with Tehaleh and major developments in the South Hill (Sunrise) and Graham (Lipoma Firs). These three developments would hit 70.5 percent of the low growth target provided (10,903 units with 27,257.5 in population with the 2.5-person household estimate):

- Tehaleh (7000 units)
  - 97.6% of plats outside community plan areas are Tehaleh-related
- Sunrise (2206 units)
- Lipoma Firs (1697 units)

The estimate above accounts for the area outside the Tacoma PAA. The total number of developments for areas inside and outside the PAA in Parkland-Spanaway-Midland is 1,192 units. 4.5 percent of pipeline projects are within the Tacoma PAA.

<table>
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<th>P/S/M Community Plan Area</th>
<th>Units</th>
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</tr>
<tr>
<td>Tacoma PAA</td>
<td>732</td>
</tr>
<tr>
<td>Total</td>
<td>1,192</td>
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</table>

Pierce County VISION 2050 Draft
Pipeline Development for Unincorporated Urban Pierce County

Population Growth
Unincorporated Urban Area Geography:
2.5-person household x 15,458 units = 38,645
2.6-person household x 15,458 units = 40,190.8

Total Unincorporated Pierce County (includes HCT Geography):
2.5-person household x 16,190 units = 40,475
2.6-person household x 16,190 units = 42,094

Date: 8/30/2019
SUMMARY OF HOUSING TRENDS & PARCEL DATA
Within
Rural Pierce County

Total Building Permits in Rural area since January 1, 2017: 1,253
• Total Final or Issued: 1,002
• Total Accepted or Approved: 178
• Total Other (i.e. Expired, Suspended, Cancelled, etc.): 73
Potential Population Increase between ’17 and ’19 = 3,400 population

Total applications Accepted or Approved since January 1, 2017 in Rural area: 92
• Final Plat: 7 (98 parcels)
• Final Short Plats: 28 (64 parcels)
• Final Large Lots: 2 (40 parcels)
• Preliminary Plat: 4 (24 parcels)
• Preliminary Short Plat: 13 (33 parcels)
• Preliminary Large Lot: 2 (6 parcels)
• Lot Combinations: 36 (-42 parcels)

262 New Parcels - = 700 population

12,714 vacant parcels = 34,300 population (assumes not further subdivision at permitted rural densities)

Total Potential population without further subdivision = 35,000

Total Population = 4,100 population reflective of 2017 – 2019 development activity.

Vision 2050 RGS Proposed ’17 and ’50 Rural Growth Range: 11,000 – 22,000

Adjusted for ’17 – ’19 Population Growth: 8,000 – 19,000 = 2,950 dwelling units – 7,000 dwelling units

98 dwelling units – 234 dwelling units per year

*2.7 Person Per Household Assumption
**Rural Vacant Parcels** - The acreage/parcel counts do not include any State or Federal lands. Properties that are zoned Forest Lands (FL) are also removed.

<table>
<thead>
<tr>
<th>Acre Category</th>
<th>Number of Parcels</th>
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<tbody>
<tr>
<td>0 - 5</td>
<td>10,746</td>
</tr>
<tr>
<td>5.01 – 10</td>
<td>1,281</td>
</tr>
<tr>
<td>10.01 - 15</td>
<td>231</td>
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<tr>
<td>15.01 - 20</td>
<td>205</td>
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<tr>
<td>20.01+</td>
<td>251</td>
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<td><strong>TOTAL</strong></td>
<td><strong>12,714</strong></td>
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**5 Acres or Less Vacant Parcels in Rural area: 10,746**

<table>
<thead>
<tr>
<th>Zoning</th>
<th>Number of Parcels</th>
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<tr>
<td>ARL</td>
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<tr>
<td>PR</td>
<td>41</td>
</tr>
<tr>
<td>R10</td>
<td>7,866 (73%)</td>
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<tr>
<td>R20</td>
<td>130</td>
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<tr>
<td>R40</td>
<td>104</td>
</tr>
<tr>
<td>R5</td>
<td>540 (5%)</td>
</tr>
<tr>
<td>RAC</td>
<td>16</td>
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<tr>
<td>RF</td>
<td>47</td>
</tr>
<tr>
<td>RIC</td>
<td>1</td>
</tr>
<tr>
<td>RNC</td>
<td>13</td>
</tr>
<tr>
<td>RSep</td>
<td>614 (6%)</td>
</tr>
<tr>
<td>RSR</td>
<td>1,094 (10%)</td>
</tr>
<tr>
<td>TC</td>
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<tr>
<td>VC</td>
<td>60</td>
</tr>
<tr>
<td>VR</td>
<td>213</td>
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**Vacant Parcels 5 – 10 Acres in Rural area: 1,281**

<table>
<thead>
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<tr>
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<tr>
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<tr>
<td>R10</td>
<td>828</td>
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<tr>
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<td>R40</td>
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<tr>
<td>R5</td>
<td>46</td>
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<td>RF</td>
<td>35</td>
</tr>
<tr>
<td>RIC</td>
<td>2</td>
</tr>
<tr>
<td>RSep</td>
<td>17</td>
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<tr>
<td>RSR</td>
<td>259</td>
</tr>
<tr>
<td>Zoning</td>
<td>Number of Parcels</td>
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<td>--------</td>
<td>------------------</td>
</tr>
<tr>
<td>ARL</td>
<td>30</td>
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<td>PR</td>
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<tr>
<td>R10</td>
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<td>R5</td>
<td>8</td>
</tr>
<tr>
<td>RF</td>
<td>3</td>
</tr>
<tr>
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<td>7</td>
</tr>
<tr>
<td>RSR</td>
<td>28</td>
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<tr>
<td>TC</td>
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</table>

<table>
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<tr>
<th>Zoning</th>
<th>Number of Parcels</th>
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<tr>
<td>PR</td>
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<tr>
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<tr>
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<tr>
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<table>
<thead>
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<tr>
<td>ARL</td>
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<tr>
<td>PR</td>
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<tr>
<td>R10</td>
<td>122</td>
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<td>5</td>
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<tr>
<td>R5</td>
<td>13</td>
</tr>
<tr>
<td>RF</td>
<td>2</td>
</tr>
<tr>
<td>Rsep</td>
<td>2</td>
</tr>
<tr>
<td>RSR</td>
<td>35</td>
</tr>
</tbody>
</table>
Large Parcels in Rural area with one building: The parcel counts do not include any State or Federal lands. Properties that are zoned Forest Lands (FL) are also removed.

There are **378 parcels 20 acres or greater with one building.**

<table>
<thead>
<tr>
<th>Zoning</th>
<th>Number of Parcels</th>
</tr>
</thead>
<tbody>
<tr>
<td>ARL</td>
<td>41</td>
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<tr>
<td>PR</td>
<td>6</td>
</tr>
<tr>
<td>R10</td>
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<tr>
<td>RSep</td>
<td>3</td>
</tr>
<tr>
<td>RSR</td>
<td>35</td>
</tr>
</tbody>
</table>

Note: The building may not be a single-family home.
*Average without 2006-2007 outliers is 377 housing units per year. *

Attachment B

Specific Requested Changes to Multicounty Planning Policies

MPP-RC-7 – Direct subregional funding, especially county-level and local funds, to countywide centers, high capacity transit areas with a station area plan, and other local centers. County-level and local funding are also appropriate to prioritize to regional centers.

Comment: This policy should be deleted. The county-level group should have local discretion in how it chooses to allocate its funds.

MPP-RGS-1 Implement the Regional Growth Strategy through regional policies and programs, countywide planning policies and growth targets, and local plans.
Comment: This policy erodes the authority of local decision makers. The Growth Management Act allows counties and its cities and town to adopt growth projections that are within the low-mid-high range as provided by the Office of Financial Management. The strict implementation of the Regional Growth Strategy does not allow local circumstances to be taken into consideration. Consider changes to Vision if the monitoring results highlights unrealistic expectations.

Comment: This policy could be strengthened if it addressed follow up steps when Vision elements are not occurring, at the sub-regional level, as envisioned in 2050. While monitoring is necessary, adjusting Vision to recognize things like the economic realities of growth is also important otherwise there is a disconnect between policies and what actually occurs.

MPP-RGS-2 Use consistent countywide targeting processes for allocating population and employment growth consistent with the regional vision, including establishing: (a) local employment targets, (b) local housing targets based on population projections, and (c) local growth targets for each designated regional growth center and manufacturing/industrial center.

Comment: What is meant by consistent countywide targeting processes? Pierce County is opposed to this policy resulting in PSRC dictating a specific process, assumption, etc, as we establish the next set of 20-year targets.

MPP-RGS-3 Provide flexibility in establishing and modifying countywide growth targets, provided growth targets support the Regional Growth Strategy regional vision.

Comment: Reference to the regional growth strategy infers consistency with specific numerical targets. This reference would prohibit numerous jurisdictions from implementing other policies (MPP-H- and H-9) related to supporting and encouraging affordable housing opportunities. The reference to specific numerical targets would prevent jurisdictions from increasing densities if their existing development capacity, even if at single-family densities, is enough to meet the numeric targets.

MPP-RGS-4 Accommodate the region’s growth first and foremost in the urban growth area. Ensure Take steps that supports that development in rural areas is consistent with the regional vision.

Comment: Counties cannot “ensure” rural areas are consistent.

MPP-RGS-6 Encourage efficient use of urban land by optimizing the development potential of existing urban lands and increasing density in the urban growth area in locations consistent with the Regional Growth Strategy regional vision.

Comment: Reference to the regional growth strategy infers consistency with specific numerical targets. This reference would prohibit numerous jurisdictions from implementing other policies (MPP-H- and H-9) related to supporting and encouraging affordable housing opportunities. The reference to specific numerical targets would prevent jurisdictions from increasing densities if their existing development capacity, even if at single-family densities, is enough to meet the numeric targets.

MPP-RGS-11 Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high capacity transit.
Comment: This policy should be modified, as it currently reads it conflicts with proposed policies MPP-H-8 and H-9 related to supporting affordable housing efforts. While high capacity transit may not be within numerous jurisdictions, public transit routes do exist. Jurisdictions should have the ability to increase ridership along these transit routes through increased density opportunities. This policy also has the effect of diminishing local control and may negatively affect local land use decision making in cities and towns which do not have high capacity transit.

MPP-RGS-12 Plan for commercial, retail, and community services that serve rural residents to locate in neighboring cities and existing activity areas to avoid the conversion of rural land into commercial uses.

Comment: Delete this policy as it is already a requirement of the Growth Management Act through the Limited Area of More Intensive Rural Development (LAMIRD) provisions.

MPP-RGS-13 Manage and reduce rural growth rates over time, consistent with the Regional Growth Strategy, to maintain rural landscapes and lifestyles and protect resource lands and the environment.

Comment: This policy reads as if counties can limit the number of permits issued within the rural area. Counties can only take steps that may result in reduced growth rates. The Growth Management Act already requires the rural area to maintain rural landscapes and protect resource lands and the environment.

RGS - Action-3: Growth Targets The Puget Sound Regional Council, together with its member jurisdictions, will provide guidance and participate with on countywide processes that set local housing and employment targets. PSRC will also provide guidance on growth targets for designated regional centers and coordinate with member jurisdictions regarding buildable lands reporting. PSRC, together with its member jurisdictions will establish a process to monitor, evaluate, and modify, if necessary, sub-regional geography housing employment targets. PSRC shall identify strategies and assist jurisdictions in refining tools that will further support the local success of achieving local targets.

Comment: It should be clear that PSRC shall only provide guidance and act as a resource through the local target setting process. It is unclear why PSRC should need to coordinate reporting related to the individual buildable lands programs. Counties have the legislative responsible to complete the reports.

MPP-En-2 Use integrated and interdisciplinary approaches for environmental planning and assessment at regional, countywide, and local levels.

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.

MPP-En-4 Ensure that all residents of the region, regardless of race, social, or economic status, have clean air, clean water, and other elements of a healthy environment.

MPP-En-5 Locate development in a manner that minimizes impacts to natural features. Promote the use of innovative environmentally sensitive development practices, including design, materials, construction, and on-going maintenance.
MPP-En-6 Use the best information available at all levels of planning, especially scientific information, when establishing and implementing environmental standards established by any level of government.

MPP-En-7 Reduce and mitigate noise and light pollution caused by transportation, industries, public facilities, and other sources.

Comment: Clarity as to what these policies (MPP-En-2 through 7) mean or what is to be considered by cities and counties beyond what is required under the GMA, SMA, stormwater regulations. The focus of policies should be rewritten to describe what type of regional collaboration should occur when individual jurisdictions implement these existing requirements.

MPP-En-11 Designate, protect, and enhance significant open spaces, natural resources, and critical areas through mechanisms, such as the review and comment of countywide planning policies and local plans and provisions.

Comment: The requirement to designate open space corridors and protect critical areas for example are already requirements under several statues including the GMA. Is this policy asking for protections beyond what our laws already require? For urban areas, how does this correlate with policies directing 1.8 million people into existing UGAs and 65% of growth within High Capacity Transit areas? The policy as written does not add value given existing laws.

MPP-En-14 Identify and protect wildlife corridors both inside and outside the urban growth area.

Comment: Delete this policy as it is already a requirement of the Growth Management Act.

MPP-En-22 Meet all federal and state air quality standards and reduce emissions of air toxics and greenhouse gases.

Comment: This is not necessary policy as local jurisdictions are already required to meet these standards.

MPP-DP-26 Affiliate all urban unincorporated lands appropriate for annexation with an adjacent city or identify those that may be feasible for incorporation. To fulfill the Regional Growth Strategy, while promoting economical administration and services, annexation is preferred over incorporation.

Comment: The Regional Growth Strategy does not infer annexation or incorporation. The preference of annexation over incorporation is the efficient provision of service.

MPP-DP-28 Support annexation and incorporation in urban unincorporated areas by planning for phased growth of communities to be economically viable, supported by the urban infrastructure, and served by public transit.

Comment: An action step should be added that requires cities to review all potential annexation areas and identify a timeframe in which they will proactively advance annexation efforts.

MPP-DP-29 Support the provision and coordination of urban services to unincorporated urban areas by the appropriate service provider the adjacent city or, where appropriate, by the county as an interim approach.
Comment: Adopted service areas dictate the service provider and many are not affected by annexation. Examples of this include water service and sanitary sewer service. In addition, many of the jurisdictions within Pierce County are provided emergency services through fire districts and annexation would not change the provider.

MPP-DP-30 Promote transit service to and from existing cities in rural areas.

Comment: Amend this policy to support the expansion of local public transit district to include all areas within a designated Urban Growth Area.

MPP-DP-32 Do not allow urban net densities in rural and resource areas.

Comment: Delete this policy as it is already a requirement of the Growth Management Act.

MPP-DP-34 In the event that a proposal is made for creating a new fully contained community, the county shall make the proposal available to other counties and to the Regional Council for advance review and comment on regional impacts.

Comment: This policy should be removed. Permits are processed pursuant to local development regulations. An FCC designation would require significant land use changes that trigger an immense amount of public participation. It is not appropriate for counties to have to amend their regulations to prioritize PSRC or other counties over its citizens, tribes, or other organizations and stakeholders.

MPP-DP-35 Use existing and new tools and strategies to address vested development to ensure that future growth meets existing permitting and development standards and prevents further fragmentation of rural lands.

Comment: This policy is very confusing. The State statute addresses vesting for subdivisions and building permits and local governments adopt regulations regarding vesting of other permit applications. Vesting would not be treated differently for rural vs urban areas and our laws already protect our rural lands.

MPP-DP-36 Ensure that development occurring in rural areas is rural in character and is focused into communities and activity areas.

Comment: Delete this policy as it is already a requirement of the Growth Management Act.

MPP-DP-37 Maintain the long-term viability of permanent rural land by avoiding, when possible, the construction of new highways and major roads in rural areas.

Comment: As acknowledged proposed policy MPP-T-22 there are instances where increased roadway capacity is warranted to support safe and efficient travel through rural areas.

MPP-DP-39 Protect and enhance significant open spaces, natural resources, and critical areas.

Comment: Delete this policy as it is already a requirement of the Growth Management Act. This policy is addressed through a previous policy that calls for the implementation of the Regional Open Space Conservation Plan.

MPP-DP-41 Support the sustainability of designated resource lands. Do not convert these lands to other uses.
Comment: Delete this policy as it is already a requirement of the Growth Management Act. This policy is addressed through a previous policy that calls for the implementation of the Regional Open Space Conservation Plan.

MPP-DP-44 Avoid growth in rural areas that cannot be sufficiently served by roads, utilities, and services at rural levels of service.

Comment: Delete this policy as it is already a requirement of the Growth Management Act.

MPP-DP-47 Protect the continued operation of general aviation airports from encroachment by incompatible uses and development on adjacent land.

Comment: Delete this policy as it is already a requirement of the Growth Management Act. It would be appropriate to replace this policy with one which would identify how individual jurisdictions should collaborate in its efforts to achieve this existing requirement.

MPP-DP-48 Protect military lands from encroachment by incompatible uses and development on adjacent land.

Comment: Delete this policy as it is already a requirement of the Growth Management Act. It would be appropriate to replace this policy with one which would identify how individual jurisdiction should collaborate in its efforts to achieve this existing requirement.

MPP-H-1 Plan for housing supply, forms, and densities to meet the region’s current and projected needs consistent with the Regional Growth Strategy.

Comment: The Regional Growth Strategy provides specific numeric population growth targets. All jurisdictions should be encouraged to increase density within the urban area to provide a range of affordable housing options.

MPP-H-2 Provide a range of housing types and choices to meet the housing needs of all income levels and demographic groups within the region.

Comment: Delete this policy as it is already a requirement of the Growth Management Act.

MPP-H-7 Expand the supply and range of housing at densities to maximize the benefits of transit investments, including affordable units, in growth centers and station areas throughout the region.

Comment: This policy currently reads as though densities should only be increased in designated growth centers, train and light rail stops or transit stations. Jurisdictions should be encouraged to support increased density along all existing transit routes to support its economic viability and expand affordable housing options.

MPP-H-8 Promote the development and preservation of long-term affordable housing options in walking distance to transit by implementing zoning, regulations, and incentives.

Comment: Numerous proposed policies do not allow all jurisdictions to promote development of new long-term affordable housing options as increasing density opportunities may be encouraging population growth inconsistent with the Regional Growth Strategy. As noted above, the phrase “consistent with the Regional Growth Strategy” should be replaced with “consistency with regional vision.”
MPP-H-9 Expand housing capacity for moderate density housing to bridge the gap between single-family and more intensive multifamily development and provide opportunities for more affordable ownership and rental housing that allows more people to live in neighborhoods across the region.

Comment: Numerous proposed policies do not allow all jurisdictions to promote development of new long-term affordable housing options as increasing density opportunities may be encouraging population growth inconsistent with the Regional Growth Strategy. As noted above, the phrase “consistent with the Regional Growth Strategy” should be replaced with “consistency with regional vision.”

H-Action-5 Affordable Housing Incentives: As counties and cities plan for and create additional housing capacity consistent with the Regional Growth Strategy, evaluate techniques such as inclusionary and incentive zoning to provide affordability.

Comment: The phrase “consistent with the Regional Growth Strategy” will prevent many jurisdictions in up-zoning areas supported by public transit because the Regional Growth Strategy focuses population growth in limited areas that have commuter rail or bus rapid transit. The regional plan should allow and encourage all jurisdictions to increase density and housing options in all urban areas supported by any level of public transit. This will assist in achieving housing goals and giving all transit routes the opportunity to increase ridership. The overachieving goal of this regional plan should be to have a more sustainable living and natural environment, not meeting specific numerical targets. The incorporation of “consistent with the regional vision” recognizes this.

MPP-PS-3 Time and phase services and facilities to guide growth and development in a manner that supports the existing and projected needs Regional Growth Strategy.

Comment: The needs of the existing population also needs to be recognized in planning for future services and facilities. The Regional Growth Strategy is aspirational and may be considered unrealistic in its application.

MPP-PS-5 Do not provide urban services in rural areas. Design services for limited access when they are needed to solve isolated health and sanitation problems, so as not to increase the development potential of the surrounding rural area.

Comment: Delete this policy as it is already a requirement of the Growth Management Act.

MPP-PS-21 Provide residents of the region with access to high quality drinking water that meets or is better than federal and state requirements.

Comment: Delete this policy as it is already a Department of Health requirement.

MPP-PS-22 Promote coordination among local and tribal governments and water providers and suppliers to meet long-term water needs in the region in a manner that supports the region’s growth strategy vision.

Comment: Reference to the regional growth strategy infers consistency with specific numerical targets. Water purveyors cannot be limited to planning and designing their system using unrealistic aspirational numerical targets. They need to utilize realistic projections. Reference to the region’s vision allows this flexibility while still meeting the overall goals of a sustainable built and natural environment.
MPP-PS-23 Reduce the per capita rate of water consumption through conservation, efficiency, reclamation, and reuse.

Comment: This is already a requirement through Department of Health water system planning.

PS-Action-1 Utility and Service District Planning: PSRC will work with electrical utilities, water providers, special service districts, and other utilities to facilitate coordinated efforts to develop long-range plans that comply with the Growth Management Act and implement VISION 2050.

Comment: PS-Action-1 – Why PSRC work with the utility providers? PSRC will certify local comprehensive plans, and local jurisdictions should be the entity to work with utility providers.
August 26, 2019

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

Re: Draft VISION 2050 Regional Plan

Dear Mr. Brown:

The City of Port Orchard has reviewed the draft VISION 2050 regional plan, which was provided for public comment on July 19, 2019. The City would like to offer its support for the draft VISION 2050 plan as written. We believe that the plan includes sound goals and policies to address the challenges facing our region.

We would also like to thank the PSRC for supporting the Transit Focused Growth alternative, and for supporting the changes to population allocations and High Capacity Transit community designations within Kitsap County, which were requested in the June 5, 2019 comment letter that was prepared collaboratively by the County and the Kitsap cities.

Thank you for the opportunity to provide comments on the draft plan. We look forward to working with the PSRC and the other Central Puget Sound communities on implementation of the final VISION 2050 regional plan through our future planning and policy strategies.

Sincerely,

[Signature]

Robert Putaansuu
Mayor

cc: Mayor Becky Erickson, City of Poulsbo
    City Manager Morgan Smith, City of Bainbridge Island
    Mayor Greg Wheeler, City of Bremerton
    Commissioner Edward E. Wolfe, Kitsap County
    Paul Inghram, Puget Sound Regional Council
September 13, 2019

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

Subject: Draft VISION 2050 Plan Comments

Mr. Paul Inghram,

Thank you for the opportunity to provide comments on the Draft VISION 2050 Plan ("the Plan") released for public review by the Puget Sound Regional Council (PSRC) in July 2019. The Puyallup City Council discussed the Plan at its meetings in August and September 2019 and has voted to submit the following comments as a body, in addition to supporting comments forthcoming from the Pierce County Regional Council.

The Plan begins with a bold vision statement to reduce our contributions to climate change, develop distinct and unique communities throughout the region, ensure economic opportunities for all people, and sustain a high quality of life by 2050. The vision statement further calls for social and economic equity so that people in our region can attain resources and opportunities to improve their quality of life in healthy communities which promote physical, social and mental wellbeing for healthier and more active lives, with a range of healthy, safe and affordable housing choices.

To realize the vision, or move towards it, will be challenging considering how the region functions today, the population growth projected to occur between now and 2050, and recognizing the advantages and constraints of the distinct communities within the region. To that point, the City of Puyallup is providing comments that address:

1) Regional Growth Strategy and growth projections,
2) Jobs-Housing Balance, and
3) Implications for Comp Plan Certification

REGIONAL GROWTH STRATEGY PROJECTIONS FOR PUYALLUP ARE CONCERNING

The City is concerned that the Regional Growth Strategy paints the region with too broad a brush when it comes to allocating growth percentages to each regional geography. It does not sufficiently take into account the variation experienced even among individual cities within a
county, including geographical and environmental constraints, transportation access, and external growth pressures.

In the Regional Growth Strategy chapter of the Plan, it states:

“The Regional Growth Strategy is a cornerstone of VISION 2050, providing specific numeric shares to achieve a development pattern with fewer environmental impacts and a more compact urban form.”

and

“The Regional Growth Strategy calls for different regional geographies to accommodate different shares of population and employment growth—within the region as a whole, as well as within each county. While relative amounts may differ somewhat between counties, the roles of regional geographies within each county are consistent for the region as a whole. Within each county, the relative distribution of growth to individual cities and unincorporated places will be determined through countywide target-setting, taking into account local circumstances.”

Core Cities in particular are expected to accommodate a greater percentage of both housing and employment growth that was anticipated under VISION 2040. This is concerning to cities such as Puyallup, as we have not seen growth rates over the past decade that would indicate the projections established for the next 30 years.

Additionally, the “Guidance for Aligning Growth Targets” section states:

“PSRC will provide updated guidance and technical assistance to counties and cities as they develop countywide growth targets and prepare for comprehensive plan updates. Guidance will address housing, regional centers, goals for transit-oriented development, support for jobs-housing balance, and other aspects of VISION 2050.”

We strongly request that the guidance provided by PSRC allow for flexibility in whether a jurisdiction has met adopted targets at the time of certification, recognizing the unique local differences and actual growth occurring that are beyond a jurisdiction’s control or not in line with a jurisdiction’s own vision for their community.

**JOBS-HOUSING BALANCE IS NOT FAVORABLE TO PUYALLUP AND PIERCE COUNTY**

Puyallup and Pierce County have become King County’s affordable housing outlet while King County has experienced exponential job growth. The Plan continues this imbalance as evidenced by the freeway congestion and transportation demands resulting from persons commuting to Seattle and other parts of King County for work from their homes in the surrounding counties.

Although this concept continues to be acknowledged as a priority of VISION 2050, the Jobs-Housing Index identified in the Draft SEIS demonstrates that King County will continue to
experience greater job growth, while Kitsap, Pierce, and Snohomish counties would still have fewer jobs compared to housing units by 2050.

The Regional Growth Strategy identifies the importance of a jobs-housing balance in all counties in the region, noting that:

"Uneven economic prosperity has also contributed to long commutes and the need for auto trips to retail and services. The Regional Growth Strategy encourages shifting expected employment growth from King County to Kitsap, Pierce, and Snohomish Counties."

However, the Housing chapter recognizes:

"A lack of housing, especially affordable housing close to job centers, will push demand for affordable homes to more distant areas, increasing commute times and the percentage of household income spent on transportation costs."

Additionally, the Economy chapter of the Plan acknowledges that not all counties have benefitted equally from recent job growth, stating:

"Nearly all this job growth in the region has been concentrated in a few urban areas. VISION 2050 calls for a better balance of job creation among the counties to broaden opportunity and create a better jobs-housing balance."

The City concurs with the comments included in the letter submitted by the Pierce County Regional Council on this issue. We would like to emphasize the need for policies that promote housing growth, particularly affordable housing, within King County in addition to policies that promote job growth in areas with a lower jobs-housing index, such as Pierce County.

The City supports the action items identified in the Economy chapter of the Plan, particularly where support is given to local jurisdictions related to job creation. In addition, we request strengthening the language related to the anticipated distribution of housing, particularly in areas of King County with the highest job growth and the greatest shortages of affordable housing.

**IMPLEMENTATION AND COMPREHENSIVE PLAN CERTIFICATION**

The plan provides the following direction related to implementation of the VISION 2050 policies and action items:

"State law requires regional "guidelines and principles" for regional transportation planning (RCW 47.80.026). The multicounty planning policies in VISION 2050 serve as the region's guidelines and principles."

and

"PSRC reviews and certifies the transportation-related provisions of local comprehensive plans based on three things:
1. Established regional guidelines and principles
2. The adopted long-range Regional Transportation Plan
3. Transportation planning requirements in the Growth Management Act

This chapter and the Plan’s “Action” items make clear that providing guidance is the purpose and responsibility of PSRC, and more specifically PSRC is to review and certify the transportation-related provisions of local comprehensive plans.

However, following the previous update and certification process, there was considerable dialogue regarding the role and level of oversight by PSRC, particularly as it related to the treatment of cities in differing regional geographies and their plan consistency with adopted growth targets. For example, growth targets for Small Cities were treated as a ceiling, while growth targets for Core Cities, such as Puyallup, were treated as a floor, even though there is no clear policy basis for this in the Plan and all urban areas are treated equally under the Growth Management Act.

We anticipate that PSRC will consider the challenging experiences of local jurisdictions during the last update and certification process, including input provided through the Taking Stock Report, and limit their review specifically to the transportation-related provisions as defined in the Growth Management Act.

Thank you for your consideration of these comments on the Draft VISION 2050 Plan. We look forward to seeing the final plan adopted and implemented as a guidance document for the region.

Sincerely,

John Palmer
Mayor

Cc: Steve Kirkelie, Interim City Manager
    Tom Utterback, Development Services Director
    Katie Baker, Senior Planner
September 16, 2019

Puget Sound Regional Council
ATTN: Draft VISION 2050 Comments
1011 Western Avenue, Suite 500
Seattle, WA  98104-1035

Dear Puget Sound Regional Council:

Redmond is committed to successfully implementing the region’s blueprint for growth contained in VISION 2040. As a city planning under the Growth Management Act, Redmond is focused on meeting its growth targets, creating two vibrant urban centers, protecting critical areas, and leveraging regional investment in infrastructure by focusing density in areas that will be served by robust transit options. We are creating a path toward a sustainable future for our community and the broader region.

Redmond supports PSRC’s foundational work on the Draft VISION 2050 plan. We support Transit Focused Growth as the appropriate regional growth pattern for the Central Puget Sound Region. The region faces important challenges to plan collaboratively for the 1.8 million new people and 1.2 million new jobs expected by 2050. We would like to ensure that the regional growth strategy contained in the final plan continues to advance outcomes that:

- Focus the great majority of new growth within cities and centers.
- Promote transit-oriented development around existing and planned infrastructure.
- Encourage a variety of housing types while addressing housing affordability for all residents.
- Reduce greenhouse gas emissions and avoid significant environmental impacts.

Focus the great majority of new growth within cities and centers

Directing growth to cities and centers benefits the largest number of our residents and workers and leverages the regional investment in public infrastructure. Cities have urban levels of service and are best situated to receive the largest proportion of forecasted growth in the region. Redmond supports this regional growth strategy that directs the most growth to the locations closest to high capacity transit.

Promote transit-oriented development around existing and planned infrastructure

The Central Puget Sound Region is investing heavily in its high capacity transit system. It is essential that VISION 2050 retain its renewed focus on locating growth near current and future high capacity transit facilities. Increased density in the form of transit-oriented development must be promoted for the region to accomplish its goal of accommodating 65% of the region’s population growth and 75% of the region’s employment growth in regional centers and within walking distance of high-capacity transit.
Encourage a variety of housing types while addressing housing affordability for all residents

As the region grows, a variety of density options and housing forms will create the greatest opportunity for housing affordability. Locating more housing closer to transit will allow households to forego a car, which can decrease their monthly expenses. While high density growth is important for achieving the region’s environmental and growth management goals, VISION 2050 should include strategies that encourage middle-density housing development that is aligned with the changing demographics of the region. Middle density housing that provides opportunity for more affordability, entry level homeownership, larger units suitable for families, and designs suitable for aging populations can create much needed housing options at all income levels.

Reduce greenhouse gas emissions and avoid significant environmental impacts

Projected changes in the climate are likely to have widespread impacts for the region's population. Growth aligned with transportation investment provides cumulative benefits that incent a more compact development pattern rather than a sprawling form. This creates the greatest opportunity to reduce greenhouse gas emissions and protect our critical areas while establishing sustainable and vibrant urban areas.

Redmond appreciates the work of PSRC to develop the draft Vision 2050 and the opportunity to comment on its work.

Sincerely,

John Marchione
Mayor
Date: September 16, 2019
To: Puget Sound Regional Council
From: City of Sammamish
Re: Feedback on Draft VISION 2050 Plan

The purpose of this letter is to provide feedback from the City of Sammamish to the Puget Sound Regional Council on the VISION 2050 Draft Plan.

Recently the Growth Management Planning Council (GMPC) and the Public Issues Committee (PIC) submitted comment letters conveying their recommendations on how to strengthen the Vision 2050 Draft Plan. The City is represented on those groups and supports the letters - and the Draft Plan as a whole - but we feel a critical policy consideration is still missing. Therefore, we are submitting this letter as a supplement with our suggested addition as follows.

Additional Policy Proposal:
Provide extra consideration to communities on the boundary of the contiguous UGA. These communities are heavily impacted by commuters who travel from outside the contiguous UGA, through the boundary communities, and into metropolitan and core cities for work. Local funding will not be adequate to provide the infrastructure and improved transit service necessary to efficiently move those commuters to the job centers.

We appreciate the opportunity to provide input and look forward to participating further in the VISION 2050 process. Please reach out if we can provide any further information.
September 16, 2019

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

Dear Mr. Brown:

Thank you for the opportunity to provide comments on the draft VISION 2050: A Plan for the Central Puget Sound Region. The City of Seattle previously provided comments on April 29, 2019 in response to the Draft Supplemental Environmental Impact Statement. We are pleased to see that the draft plan has incorporated many of our recommendations.

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. The draft VISION 2050 plan builds on the strengths of the current plan, VISION 2040, to guide the work of PSRC in collaboration with other key public agencies. VISION 2050 also provides a foundation for counties and cities to adopt comprehensive plan updates over the next several years that advance four key areas: compact growth around transit, housing affordability, race and equity, and climate change. Our comments and recommendations will focus on each of these in turn.

**Compact Growth around Transit**

We largely support the proposed Regional Growth Strategy that is a centerpiece of VISION 2050. The proposed strategy reflects many of the elements of the Transit Focused Growth alternative that was studied in the DSEIS and shown to perform better than the other alternatives across a range of environmental measures. Transit focused growth achieves a more sustainable land use pattern, multimodal mobility benefits, reduced impacts on the natural environment, and opportunities to provide housing close to jobs and opportunities for all types of households.

Under the state Growth Management Act, King County and its cities have had substantial success in steering growth away from our rural and resource lands and focusing housing and jobs within designated centers and other areas with access to high capacity transit (HCT). A predominantly transit-oriented development pattern achieved across the entire 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.

The PSRC boards should consider the following refinements to strengthen the growth strategy in the final proposed VISION 2050 plan:

- Align the proposed Regional Growth Strategy more closely with the Transit Focused Growth alternative, to the extent feasible, in all four counties by further reducing allocated population growth in rural and unincorporated urban areas lacking high capacity transit
- Promote tools to steer growth away from outlying areas, including unincorporated areas within the UGA that lack transit, to include transfer or purchase of development rights, infrastructure policies, land use regulations, and economic incentives
- Set high expectations for equitable transit-oriented development (TOD) in all station areas, through inclusive community engagement, investments in affordable housing and broad anti-displacement measures, and targeted community investments

**Housing Affordability**

Housing is a regional system, and all cities and counties have a responsibility to help provide housing choices to meet our region’s needs. With the region facing an ongoing housing affordability and homelessness crisis, the draft VISION 2050 plan includes a number of improvements over VISION 2040 to promote housing supply, variety, and affordability.

We particularly applaud the inclusion of policies that urge local governments to expand the supply of “missing middle” housing, promote innovative tools such as incentive zoning, and heighten focus on the need to identify and mitigate displacement risk. As an important next step, VISION 2050 calls for interjurisdictional collaboration around a regional housing needs assessment and regional housing strategy. City of Seattle looks forward to participating in these efforts.

The PSRC boards should consider the following refinements to strengthen the housing provisions in the final VISION 2050 plan:

- Promote a better balance between the location of housing and jobs across the region, with consideration of housing costs and local wage levels, and opportunities to guide additional housing growth to locations that have access to regional employment centers
- Encourage an increased supply and variety of nearby housing options with accessible “last mile” connections to regional transit
- Action steps that set the stage for potential multi-jurisdiction approaches to homelessness as a regional issue and increasing funding available for affordable housing production and preservation
• Recognize critical cross-sector partnerships—including those with non-profit and private housing developers, major employers, and service and neighborhood organizations—necessary to bring new strategies to scale across the region

Race and Equity

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. 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. 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.

The draft VISION 2050 plan adds policies that provide guidance to local governments and a common framework for continuing to collaborate regionally around equity, in particular through the development of a new Regional Equity Strategy that involves regional, local, and community stakeholders. We look forward to being at that table.

The PSRC boards should consider the following refinements to strengthen the equity provisions in the final VISION 2050 plan:

• Development of more specific tools and technical assistance, through the Regional Equity Strategy, for jurisdictions across the region to address urgent challenges of displacement and suburbanization of poverty

• Policies or actions supporting the use of an equity impact tool for evaluating PSRC board and work decisions and community engagement efforts

Climate Change

VISION 2050 is an opportunity to redouble efforts and put forward the boldest strategies across the four-county region to combat climate change, prepare for inevitable climate impacts, and prosper in a carbon-constrained/free future. As the City of Seattle strives to achieve its own goal to become carbon neutral by 2050, we want to underscore our shared responsibility with the rest of the Puget Sound region.

We are pleased to see that the draft VISION 2050 plan includes a new chapter dedicated to climate change. The chapter includes compelling regional data on GHG emissions and highlights important work that PSRC has done around a 4-part strategy to reduce emissions in the transportation sectors. Further, the proposed Regional Growth Strategy provides benefits related to climate change, specifically reducing VMT and emissions.
The PSRC boards should consider the following refinements to strengthen the climate change provisions in the final VISION 2050 plan:

- Include numeric greenhouse gas reduction goals, such as the Puget Sound Clean Air Agency regional emissions reductions targets, and provide direction to use regional GHG goals as a baseline and measurement framework for regional and local assessment and accountability.

- Consider an implementation action to work with local governments and other key agencies and stakeholders in the region to develop a regional climate change strategy, building on the 4-part strategy, and also incorporating:
  - A wider range of non-transportation GHG sources, including the built environment
  - Regional decarbonization of transportation, primarily through electrification
  - Conversion of energy systems to renewables, considering innovative tools such as on-site generation and community solar
  - Energy efficiency and embedded carbon in buildings and infrastructure

- Consider ways to enhance policies and actions on climate resilience, particularly for low-income communities of color who may be at greater risk from flooding, higher summer temperatures, and hazardous air quality events.

Finally, the value of VISION 2050 can only be realized through meaningful implementation. Among the tools that PSRC has to achieve our shared objectives for compact growth, housing affordability, racial equity, and climate mitigation and resilience are 1) transportation project funding and 2) regional review and certification of local comprehensive plans. We urge PSRC to adopt policies and procedures for implementing VISION 2050 that make full use of these tools.

We appreciate the opportunity to comment on the draft VISION 2050 plan. We look forward to working with you through the City’s representatives on the PSRC Executive Board, Growth Management Policy Board, and Regional Staff Committee to further strengthen the VISION 2050 for adoption by the General Assembly in spring 2020. City staff will be available to support this process, including collaborative work to proposed specific amendment language to the PSRC boards as they work toward a final plan. To this end, Seattle Office of Housing recently submitted suggested edits to the Housing chapter, which complement the formal City of Seattle comments on VISION 2050 contained in this letter.

If you have any questions, please don’t hesitate to contact Michael Hubner, Long Range Planning Manager, at 206-684-8380.

Sincerely,

Samuel Assefa
Director
September 3, 2019

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

Via Email: VISION2050@psrc.org

RE: DRAFT VISION 2050 Comment

To Erika Harris:

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 DRAFT VISION 2050. We appreciate the amount of work that has gone into first preparing the SEIS, then the draft vision, and the opportunity for the public to provide input on the vision for the next 30 years on how and where the central Puget Sound region should grow.

VISION 2050 is a shared strategy for how and where the central Puget Sound region can grow to a forecast of 5.8 million people and 3.4 million jobs by the year 2050. Over the next 30 years, the region is forecasted to grow by 1.8 million additional people and 1.2 million new jobs.

The Regional Growth Strategy of VISION 2050 considers how the region can distribute the forecasted growth, primarily within the designated urban growth area, and support development near high-capacity transit in the region. The strategy is a description of a preferred pattern of urban growth that has been designed to minimize environmental impacts, support economic prosperity, advance social equity, promote affordable housing choices, improve mobility, and make efficient use of new and existing infrastructure. VISION 2050 envisions a future where the region:

- Maintains stable urban growth areas.
- Focuses the great majority of new population and employment within urban growth areas.
- Maintains a variety of community types, densities, and sizes.
- Achieves a better balance of jobs and housing across the region.
- Within urban growth areas, focuses growth in cities.
- Within cities, creates and supports centers to serve as concentrations of
jobs, housing, services, and other activities.
- Builds transit-oriented development around existing and planned infrastructure.
- Uses existing infrastructure and new investments efficiently.

The City of Shoreline has taken steps to prepare for the influx of people and jobs over the next 30 years including:
- Planning for two new light-rail stations;
- Allowing a range of housing types and densities within walking distance of high-capacity rail and bus transit;
- Requiring green building construction within our light-rail station areas;
- Requiring affordable housing in our light-rail station areas;
- Creating and implementing a Sustainability Strategy;
- Becoming the first Salmon-Safe certified city in Washington State;
- Creating and implementing a Climate Action Plan;
- Updating the Surface Water Master Plan and Parks, Recreation, and Open Space Plan,
- Creating the Town Center Subarea and the Community Renewal Area at Shoreline Place to create opportunities for live, work, and gathering; and
- Transportation plans and projects that prioritize multi-modal transportation options throughout the city.

After initial review of the draft VISION 2050, the goals and policies of VISION 2050 align with those of the City’s Comprehensive Plan, Subarea Plans, Transportation Plan, and development regulations.

VISION 2050 calls for cities and counties to support the building of more diverse housing types, especially near transit, services, and jobs, to ensure all residents can live in thriving urban places. Shoreline supports this by adopting Mixed-Use Residential zones that allow multiple housing types with no prescribed density limits.

VISION 2050 also calls for more housing affordable to low- and very low-income households and Shoreline has required affordability at 70% AMI for rental units in the station areas.

VISION 2050 works to substantially reduce greenhouse gas emissions in support of state, regional and local emissions reduction goals and Shoreline has adopted a Sustainability Strategy, Climate Action Plan, set greenhouse gas reduction emission targets, and became Salmon Safe certified that will eventually reduce carbon emissions, provide cleaner surface water, and generally provide a cleaner environment for the residents of Shoreline.

VISION 2050 strives to accommodate growth in urban areas, focused in designated centers and near transit stations, to create healthy, equitable, vibrant communities well - served by infrastructure and services.
The following analysis shows how the City of Shoreline’s adopted plans, policies, and development regulations are in line with the Draft VISION 2050.

**Regional Growth Strategy Policies**

*MPP-RGS-7 Attract 65% of the region’s residential and 75% of the region’s employment growth to high capacity transit station areas to realize the multiple public benefits of compact growth around high-capacity transit investments. As jurisdictions plan for growth targets, focus development near high-capacity transit to achieve the regional goal.*

The City adopted the 185th Street and 145th Street Station Subarea Plans to address land use and transportation needs around the future light-rail stations. The plans are intended to attract a vibrant mix of land uses that offer housing choice, jobs, businesses that serve the neighborhoods, social and recreational opportunities, and community services. 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.

**Environment Policies**

*MPP-En-5 Locate development in a manner that minimizes impacts to natural features. Promote the use of innovative environmentally sensitive development practices, including design, materials, construction, and on-going maintenance.*

*MPP-En-6 Use the best information available at all levels of planning, especially scientific information, when establishing and implementing environmental standards established by any level of government.*

*MPP-En-16 Preserve and enhance habitat to support healthy wildlife and accelerate the recovery of salmon, orca, and other threatened and endangered species. (Salmon Safe Certification)*

The City last updated the Critical Areas Ordinance in 2015 and addresses the suitability for development in and near wetlands, steep slopes, streams, shorelines, and wildlife habitat. On Earth Day 2019, the City became the first Salmon-Safe Certified City in Washington State to further reduce pollutants and pesticide use, improve erosion control, conserve water, and install rain gardens and other “green infrastructure” to keep stormwater runoff clean.

**Climate Change Policies**

*MPP-CC-1 Advance state, regional, and local actions that substantially reduce greenhouse gas emissions in support of state, regional, and local emissions reduction goals, including targets adopted by the Puget Sound Clean Air Agency.*
MPP-CC-2 Reduce building energy use through green building and retrofit of existing buildings.

The City adopted the Climate Action Plan in September 2013 to place a priority on sustainable land use and building practices, resilience of our natural systems, and reducing the City’s carbon footprint. The city requires mandatory green building in the City’s two light-rail station areas and has adopted a Deep Green Incentive Program to encourage the construction of green building throughout the City.

Development Patterns Policies

MPP-DP-1 Develop high-quality, compact urban communities throughout the region’s urban growth area that impart a sense of place, preserve local character, provide for mixed uses and choices in housing types, and encourage walking, bicycling, and transit use.

MPP-DP-3 Enhance existing neighborhoods to provide a high degree of connectivity in the street network to accommodate walking, bicycling, and transit use, and enough public spaces.

MPP-DP-16 Promote cooperation and coordination among transportation providers, local government, and developers to ensure that joint- and mixed-use developments are designed to promote and improve physical, mental, and social health and reduce the impacts of climate change on the natural and built environments.

MPP-DP-21 Plan for densities that maximize benefits of transit investments in high-capacity transit station areas that are expected to attract significant new population or employment growth.

The region’s existing and planned transit system connects central places throughout the region, providing people access to housing and jobs, and affordable transportation choices. In many cases, transit options connect dense, vibrant urban places that are planned to accommodate more growth. As the transit network expands, suburban communities will also have access to more mobility options, and an opportunity to transform from auto-oriented areas with separated land uses to compact, mixed-use, and walkable neighborhoods.

VISION 2050 encourages focusing growth in these areas and conducting station area planning to maximize benefits. 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.

The Draft VISION 2050 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 LU11 through LU17 which encourage the development of walkable places with architectural interest that integrate a wide variety of dense walkable communities, retail, office, and service uses.

**Housing Policies**

*MPP-H-1* Plan for housing supply, forms, and densities to meet the region’s current and projected needs consistent with the Regional Growth Strategy.

*MPP-H-2* Provide a range of housing types and choices to meet the housing needs of all income levels and demographic groups within the region.

*MPP-H-3* Achieve and sustain – through preservation, rehabilitation, and new development – a sufficient supply of housing to meet the needs of low-income, moderate-income, middle-income, and special needs individuals and households that is equitably and rationally distributed throughout the region.

The City has addressed housing through the Comprehensive Plan and a comprehensive housing strategy that increases affordability and choice within the local housing stock in order to accommodate the needs of a diverse population. The construction of two light rail stations will provide opportunities for increased residential densities within a ½ mile of each station. Since the approval of the light-rail station subarea plans, the city has experienced a noticeable uptick in the amount of single-family attached and townhome units coming to market. In addition, all the housing built within the light-rail station subareas must be built to Built-Green or equivalent standards. The City’s housing goals and policies include:

Goal H I: Provide sufficient development capacity to accommodate the 20-year growth forecast and promote other goals, such as creating demand for transit and local businesses through increased residential density along arterials; and improved infrastructure, like sidewalks and stormwater treatment, through redevelopment.

Goal H II: Encourage development of an appropriate mix of housing choices through innovative land use and well-crafted regulations.

Goal H III: Preserve and develop housing throughout the city that addresses the needs of all economic segments of the community, including underserved populations, such as households making less than 30% of Area Median Income.

**Economy Policies**

*MPP-EC-1* Support economic development activities that help to recruit, retain, expand, or diversify the region's businesses, targeted towards businesses that provide living-wage jobs.

*MPP-EC-7* Foster a supportive environment for business startups, small businesses, locally owned and women- and minority-owned businesses to help them continue to prosper.
MPP-EC-10 Ensure that the region has a high-quality education system that is accessible to all of the region's residents.

The city has taken steps to support economic development activity that includes creating places for people to shop, live, and gather.

Four specific areas possess the potential to dramatically strengthen the economic vitality of Shoreline. These City-Shaping Areas shall be the focus of concerted Placemaking Projects designed to trigger large-scale redevelopment and growth.

• Strengthen Shoreline’s Signature Boulevard – leveraging the city’s $140 million Aurora Corridor Project by facilitating constant investment along its six miles of improved frontage.
• Catalyze Shoreline Place – encouraging intensive private redevelopment of the former Sears center into an exemplary lifestyle destination.
• Ignite Station Area Growth – parlaying the extraordinary public investment that will bring light rail service to Shoreline’s two rezoned station areas.

Additional commercial nodes can influence the economic vitality of the surrounding neighborhoods. Placemaking Projects in these Neighborhood Commercial Centers shall seek to create identity, encourage walkability, expand housing options, and provide needed goods and services.

• Shoreline Town Center.
• Echo Lake at Aurora & N 192nd.
• North City Business District.
• Four Corners at NW Richmond Beach Rd.
• Downtown Ridgecrest.
• Ballinger Commercial Center.

Transportation Policies

MPP-T-7 Coordinate state, regional, and local planning efforts for transportation through the Puget Sound Regional Council to develop and operate a highly efficient, multimodal system that supports the Regional Growth Strategy.

MPP-T-8 Strategically expand capacity and increase efficiency of the transportation system to move goods, services, and people consistent with the Regional Growth Strategy. Focus on investments that produce the greatest net benefits to people and minimize the environmental impacts of transportation.

MPP-T-15 Prioritize investments in transportation facilities and services in the urban growth area that support compact, pedestrian- and transit-oriented densities and development.
MPP-T-16 Improve local street patterns – including their design and how they are used – for walking, bicycling, and transit use to enhance communities, connectivity, and physical activity.

MPP-T-17 Promote and incorporate bicycle and pedestrian travel as important modes of transportation by providing facilities and reliable connections.

MPP-T-18 Promote coordination among transportation providers and local governments to ensure that joint- and mixed-use developments are designed in a way that improves overall mobility and accessibility to and within such development.

The City updated the Transportation master Plan in 2011 which coordinates transportation improvements with land uses and plans for what is needed to respond to growth. The City’s Public Works Department took an approach that designs a system for all users, including pedestrians, bicyclists, transit riders, and motorists. To implement this approach the City has developed:

- Goals, policies, and implementation strategies that identify how to improve and expand Shoreline’s transportation system.
- Bicycle, Pedestrian, and Transit System Plans that show complete systems for mobility throughout the City.
- Prioritized projects for funding including bicycle, pedestrian, and traffic safety and operations projects.
- Projects needed to accommodate growth over the next twenty years.
- Updated street classifications that match the existing use of the street with the appropriate classification.
- A funding strategy to pay for the identified improvements.
- An updated concurrency standard that ensures adequate transportation facilities will be in place as growth occurs.

In addition, the City is currently working on the following projects that promote walkability, bicycling, and aesthetic improvements to encourage safe connections through higher density, mixed-use development, especially near future light-rail service:

- 145th Street Corridor Study
- 148th Street Non-Motorized Bridge
- 175th Street Corridor Improvements
- 185th Street Multimodal Corridor Strategy (pre-design study)
- Bicycle Plan
- Neighborhood Traffic Safety Program (NTSP)
- Sidewalk Prioritization Plan
- Street Light Program
- Streetlight Master Plan
- Trail Along the Rail Feasibility Study
Public Services Policies

MPP-PS-3 Time and phase services and facilities to guide growth and development in a manner that supports the Regional Growth Strategy.

MPP-PS-13 Promote the use of renewable energy resources to meet the region’s energy needs.

Public services are essential to the day-to-day operation of the region, helping make communities safe, healthy, prosperous, and resilient. As the region grows, public services will need to continue to adjust and evolve to meet the region’s changing needs. Shoreline has adopted goals and policies in the Comprehensive Plan that align with the proposed Public Services Policies including:

Goal CF 1: Provide adequate public facilities that address past deficiencies and anticipate the needs of growth through acceptable levels of service, prudent use of fiscal resources, and realistic timelines.

CF15: Through site selection and design, seek opportunities to minimize the impact of capital facilities on the environment, and whenever possible, include enhancements to the natural environment.

CF26: Plan accordingly so that capital facility improvements needed to meet established level of service standards can be provided by the City or the responsible service providers.

New or expanded public services and infrastructure are needed to support new development. At the same time, existing infrastructure requires ongoing maintenance and upgrading. Using more efficient designs and technologies can curb some of the need for new infrastructure. A commitment to sustainable infrastructure ensures the least possible strain on the region’s resources and the environment, while contributing to healthy and prosperous communities.

Thank you for the opportunity to comment on the Draft VISION 2050.

Rachael Markle, AICP, Director
City of Shoreline Planning & Community Development

9-3-19
Date
September 11, 2019

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

SUBJECT: Snohomish County 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. Snohomish County is pleased to see that many of our past comments were implemented into the draft plan. We recognize the significant amount work that has gone into development of the key regional visioning document and are thankful to those that have contributed to this process. We are looking forward to the future adoption of VISION 2050 and are eager to see it implemented in Snohomish County and throughout the region.

First, the Snohomish County Council and County Executive would like to express support for the comments included in the letter sent by Snohomish County Tomorrow (SCT). We hope that they are received positively and are considered for inclusion in VISION 2050.

Second, we have identified a few topics that are crucial in planning for Snohomish County’s future growth and we believe deserve further discussion, acknowledgement, and possibly recommended plan modifications.

**Transit Focused Growth**

Snohomish County supports the selection of the Transit Focused Growth alternative. The Draft Preferred Alternative will help the region accommodate our significant projected growth, while acknowledging realistic regional and local circumstances. With a 6% growth allocation for Snohomish County’s rural and 4% for urban unincorporated geographies respectively, we will more realistically be able to meet our target goals into the next 30 years. We believe that the adjustments to the rural and urban unincorporated growth shares from earlier drafts are warranted because they recognize historic lot patterns, the presence of existing lots, and realistic market factors, while considering the impact of the timing of transit investment on growth and development. Further, as is stated in the SCT letter, the Draft Preferred Alternative has most of the benefits of the original Transit Focused Growth Alternative while preforming significantly better than the Stay the Course and Reset Urban Growth Alternatives. To support the July plan, we urge you to consider the additional data and analysis that is included in the letter from Snohomish County Tomorrow.

**Timing of Growth**

Snohomish County would further like to reiterate the importance of understanding and acknowledging the timing component of the Regional Growth Strategy. We support the discussion on page 43 of the plan, which recognizes that in some cases, growth shifts are dependent on the completion of transit investments and the timing of the associated market response. As such, adjustments to growth shares could experience a timing delay as transit investments are implemented. To further accommodate these factors, Snohomish County supports the SCT recommended modifications to RGS-Action-3.
Flexibility
In Snohomish County’s letter dated April 24, 2019, we requested that VISION 2050 allow for local flexibility in setting and modifying countywide population distributions and urban growth boundaries (UGA). Page 24 of the draft VISION 2050 includes an acknowledgement that processes for amending urban growth boundaries are already established by the GMA, countywide planning policies, and local comprehensive plans. While we support the new language, which elaborates on the discussion included in VISION 2040, we would like to reiterate that VISION 2050 needs to emphasize local UGA boundary flexibility to allow for changing population distributions. That flexibility should take logical service and natural boundaries into consideration. Further, Snohomish County is supportive of the inclusion of MPP-RGS-3, which provides flexibility for growth targets in countywide planning policies, and the modified language recommended by SCT.

Washington State Department of Transportation Collaboration
In unincorporated Snohomish County, as in many other parts of the region, the backbone of the transportation network is the state highway system. As we have stated in previous comment letters, Snohomish County’s ability to provide the necessary transportation infrastructure to support the Regional Growth Strategy depends on improvements to mid-level state highway corridors such as SR 9 and east/west corridors including SR 524, SR 522, and US 2. The Regional Transportation Plan (RTP) provides detail on needed state projects including an estimated completion year, but the delivery of these projects lags behind the need. The MPPs should be clearer about the role that WSDOT plays in the success of the regional vision through the delivery of state-level projects as outlined in the RTP. To incorporate these concerns into VISION 2050, Snohomish County recommends the following amendments to MPP-T-7:

Coordinate state WSDOT, regional, and local planning efforts for transportation agencies, through the Puget Sound Regional Council and in collaboration with the state legislature, to develop, fund, complete, and operate a highly efficient, multimodal system necessary to support the regional growth strategy, as envisioned in the Regional Transportation Plan.

Other Acknowledgements
Finally, we would again like to express gratitude to PSRC and the Growth Management Policy Board for implementing many of our past comments into the draft VISION 2050. Specifically, we support the following items which we have commented on in the past and are reflected in the draft VISION 2050: (1) the addition of High-Capacity Transit Communities into the Regional Growth Strategy; (2) the inclusion of language that provides local flexibility for countywide center, local center, and station area planning; and (3) policies related to the development of moderate density housing and a diverse range of housing types.

Thank you for the opportunity to comment on the July 19, 2019 draft VISION 2050. Please feel free to reach out to us with desired follow-up or questions related to any of the comments found in this letter.

Sincerely,

Dave Somers
Snohomish County Executive

Terry Ryan, Chair
Snohomish County Council
September 16, 2019

The Honorable Ryan Mello
Chair, Growth Management Policy Board

c/o City of Tacoma
747 Market Street
Tacoma, WA 98402

c/o Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Dear Chair Mello:

Thank you for the opportunity to submit comments on behalf of the City of Snoqualmie on PSRC’s draft VISION 2050 Plan.

As an initial matter, please know that the City of Snoqualmie supports many of the planning principals discussed in the draft VISION 2050 Plan. Some significant issues remain with the draft VISION 2050.

First, as indicated in my correspondence over the last several years with both the PSRC’s Executive Board and Growth Management Policy Board, it is not appropriate for the PSRC to use its general planning documents in an effort to convert population and employment “targets” into maximums or “ceilings.” The GMA and decisions of the Growth Management Hearings Board are very clear that cities do have an obligation to plan for the minimum employment and population targets handed down from the State’s Office of Financial Management, but those targets in no way constitute a maximum or limitation.
on a city’s actual growth or the amount of employment or population growth for which a city’s elected leaders might, in their legislative discretion, choose to accommodate.

Given the above, Snoqualmie joins in the concerns articulated in the August 28, 2019 letter to you from City of North Bend Mayor Ken Hearing, and in Mayor’s Hearing’s request that you incorporate the comments and suggested edits set forth in Mayor Hearing’s letter. In addition, the PSRC should carry forward the language from VISION 2040, at page 47, that clearly and simply acknowledges that “targets” are “minimums”:

**Growth Targets.** A growth target is the minimum number of residents (or in the case of employment, the minimum number of jobs) a given jurisdiction is expected to accommodate by some future year. As part of the state’s planning process, the target is an information tool intended to provide policymakers and others with a consistent estimate of how much growth is coming, and where it is expected and intended to go.

The above-quoted language was good enough for the VISION 2040 Plan. Including it now would help put to rest any further debate on this issue, which has been counterproductive to broader regional planning efforts on which broad consensus is necessary. It would also help prevent any future misuse of planning documents adopted by dedicated PSRC board members like yourself, who have their own individual cities to work for and who may be less familiar with the potential impact on smaller cities of imprecise VISION 2050 language.

In addition, the draft VISION 2050 contains a more fundamental flaw, in the form of its apparent assumption that PSRC is authorized to sit as a regional land use body, and review and approve or disapprove of cities’ locally-adopted GMA comprehensive plans. The PSRC simply lacks that legal authority, either under the GMA or under PSRC’s formative legal documents.
As you may know, PSRC was formed in 1991 as the result of an interlocal agreement. The PSRC Interlocal Agreement repeatedly recognizes that PSRC documents are to be "based on and developed from" local comprehensive plans – not the other way around.

For example, Section I states that PSRC’s mission is to adopt, and maintain goals, policy, 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.” Section VII identifies PSRC’s “Functions/Authorities,” with PSRC’s primary function to prepare a Regional Transportation Plan (RTP), and then certify transportation elements of local comprehensive plans are consistent with the RTP and the comprehensive planning provisions of the GMA. Interlocal Agreement at § VII(A)(4).

A secondary function of the PSRC is to develop a regional growth strategy, but Section VII(B) of the Interlocal Agreement expressly states that “[t]he regional growth management strategy shall be based on and developed from local comprehensive planning and address only regional issues. . . .” (Italics added).

The Interlocal Agreement contains an additional Section VIII, addressing PSRC’s relationship with local and state governments. This Section limits the PSRC’s growth planning role to establishing a “vision and goals for growth and mobility within the region,” reiterating that “The RTP and the regional growth management strategy are based on direction of state law and based on and developed from local comprehensive plans.” (Italics added).

The PSRC Interlocal Agreement simply recognizes the legal reality of the Growth Management Act (GMA). In the GMA, the Legislature expressly recognized a number of key principles: (1) a city’s leaders have a “broad range of discretion” that they may exercise under the GMA, and that discretion rests with a city’s local elected leaders, not an unelected, regional body; (2) a city’s comprehensive plan and development regulations “are presumed valid upon adoption; and (3) to the extent any body possesses the legal authority
to review a city’s comprehensive plan, that body is the Growth Management Hearings Board – not the PSRC. See RCW 36.70A.280, 320, and .3201.

Unfortunately, the VISION 2050 draft posits a relationship in which the PSRC would sit as the “uber” land use body to review and approve or disapprove a city’s comprehensive plan. While in some places, VISION 2050 correctly identifies the role that multi-county planning policies play under the GMA, VISION 2050 often strays beyond those references to suggest a broader role for PSRC and the VISION 2050 plan, in ways that improperly infringe upon local cities’ GMA authority. Examples include:

p. 8: “Counties and cities look to multicounty planning policies to inform updates to countywide planning policies and local comprehensive plan updates. In addition to multicounty planning policies, each policy chapter contains actions that identify PSRC and local implementation items that contribute to achieving the regional vision and desired outcomes. PSRC and local jurisdictions are expected to address these actions through their planning and work programs.”

p. 9: “PSRC’s plan review process ensures that countywide planning policies, local comprehensive plans, subarea plans for regional centers, and transit agency plans are consistent with VISION 2050 and the Growth Management Act.”

p. 12: “Actions implement the policies and outline responsibilities and tasks for PSRC, local governments, and other partners. Regional-level actions are primarily the responsibility of PSRC. Local-level actions are intended for implementation by counties, cities, and towns. Recognizing the different capacity of various municipalities to work on plan-related provisions, PSRC will make efforts to assist counties, cities, and towns in addressing these actions.”
p. 13, text and graphic: “The law requires consistency between multicounty planning policies (VISION 2050), countywide planning policies, and local comprehensive plans, while recognizing that specific aspects of implementation often occur through local actions.

Under the heading “Washington State Planning Framework,” Figure 4’s graphic improperly includes “VISION 2050 & Multi-county Planning Policies,” and improperly depicts VISION 2050 as having precedence over “Local Comprehensive Plans.”

VISION 2050’s draft policies also hint at an improper role for PSRC regarding local comprehensive plans. These include:

p. 20: “RC-Action-1 Plan Updates: PSRC will support efforts to update countywide planning policies, local comprehensive plans, and infrastructure and utility plans, including providing updated plan review and certification guidance.

p. 20: “Outreach: PSRC will 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. This work program will have the following objectives:

• Build awareness of VISION 2050 among local jurisdictions in advance of the development of local comprehensive plans."

VISION 2050’s discussion of “Guidance for Aligning Growth Targets” is particularly problematic, as illustrated in the italicized portions of quotations below:

p. 43: Guidance for Aligning Growth Targets
Counties and cities work together to establish growth targets for each jurisdiction to accommodate projected growth. These
targets set by countywide planning bodies support implementation of the Regional Growth Strategy and VISION 2050 objectives of housing production, better jobs-housing balance, and greater growth near the region’s transit investments. Counties and their cities will define new countywide growth targets prior to the next cycle of local comprehensive plan updates.

This section addresses principles to guide regional review of countywide growth target allocations and comprehensive plan certification.

• PSRC will provide updated guidance and technical assistance to counties and cities as they develop countywide growth targets and prepare comprehensive plan updates. Guidance will address housing, regional centers, goals for transit-oriented development, support for jobs/housing balance, and other aspects of VISION 2050.

• PSRC will review countywide adoption of growth targets with recognition of good faith efforts to be consistent with the Regional Growth Strategy and VISION 2050 over the long-term. Targets should demonstrate how cities and counties are working towards the outcomes and objectives of the Regional Growth Strategy. In some cases, countywide growth targets may not fully align with the precise shares in the Regional Growth Strategy. For example, there are jurisdictions where high-capacity transit is planned to be built and operational late in the planning period, and higher growth rates may not occur until the last decades of this plan.

• Comprehensive plans for cities and counties are expected to include their adopted countywide growth targets. The Growth Management Act requires counties and cities to, at a minimum, accommodate 20-year projected growth targets.

• PSRC review and certification of local plans is based on actions and measures to implement VISION 2050 and work towards the Regional Growth Strategy, and not simply on whether local planning assumptions match targets. In
developing comprehensive plan updates, jurisdictions will be asked to explain how the plan supports VISION 2050 and works to meet the Regional Growth Strategy over the long term.

- In its review of comprehensive plans for certification, PSRC reviews consistency of the plan with adopted countywide growth targets. As VISION 2050 is implemented, PSRC will update the Plan Review Manual to provide additional guidance on planning for growth targets prior to comprehensive plan updates.

To be sure, the PSRC does have a legal role, as a Regional Transportation Planning Organization, to certify the transportation elements of locally-adopted comprehensive plans. Nothing provides the PSRC the authority to certify a city’s entire comp plan, however, or to sit in judgment of the City’s land use planning assumptions with respect to VISION 2050 or any other regional plan.

Similar problems exist with respect to so-called “Regional Growth Strategy Policies.” Examples include the following:

MPP-RGS-1
Implement the Regional Growth Strategy through regional policies and programs, countywide planning policies and growth targets, and local plans.

MPP-RGS-2
Use consistent countywide targeting processes for allocating population and employment growth consistent with the regional vision, including establishing: (a) local employment targets, (b) local housing targets based on population projections, and (c) local growth targets for each designated regional growth center and manufacturing/industrial center.
MPP-RGS-11
Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high-capacity transit.

RGS-Action-3
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. 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.

To correct this, all of the italicized quotations above should be deleted, or corrected so that their language does not imply an ability for PSRC to approve local comprehensive plans or to dictate the population, housing or employment targets for local jurisdictions as they may be assigned by OFM or through the countywide planning process. Despite whatever good intentions PSRC staff may have, PSRC has not been endowed by the Legislature with the legal authority to act as a “super-planning” body, or to dictate the choices local city elected officials may make for their own cities in fulfilling their obligations under the GMA.

As a sitting City of Tacoma council member, you would not want PSRC staff, or King County or City of Seattle officials, to dictate the choices your city council colleagues might make for Tacoma’s next comprehensive plan, or the economic development choices Tacoma might wish to make. Those choices lay with the elected members of the Tacoma City Council. For the same reason, choices about the planning futures of cities like Poulsbo, Duvall, Covington, North Bend, Snoqualmie, and other smaller cities lay with those cities’ elected city councils – not with PSRC. The draft VISION 2050 should be revised to correct its flawed underlying assumptions, as outlined above and in Mayor Hearing’s August 28, 2019 letter to you.
Thank you in advance for your and the GMPB’s careful consideration of this letter.
Sincerely,

Matthew R. Larson
Mayor

cc: Snoqualmie City Council members
    King County Council member Kathy Lambert
    Ken Hearing, Mayor, City of North Bend
    Bob Larson, City Administrator
    Mark Hofman, Community Development Director
    Bob C. Sterbank, City Attorney
September 9, 2019

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

RE: VISION 2050 Draft

Dear Mr. Brown:

The City of Tacoma would like to express our strong support for the VISION 2050 draft currently out for public review and comment.

The City appreciates the extensive opportunities to participate in the detailed drafting of this plan and its policies over the past year. Your staff have done an outstanding job in working through your committee structure to seek common ground on a direction that we can all follow to make this region continue to thrive and prosper as we add significantly more population and employment; and to do so in an equitable and sustainable manner.

The City of Tacoma supports the current policy language and would only want to see stronger language as follows:

Jobs/Housing Balance
- Page 96 – add to Housing Policy MPP-H-1, "and to advance job-housing balance to the maximum extent feasible"
- Page 97 – add to Housing Actions H-Action-1 (first bullet) "and to advance job-housing balance to the maximum extent feasible"

Regional Collaboration Policies
- Page 19 – in MPP-R-6 expand "support designated regional growth centers" to "support designated and high performing regional growth centers"
- Page 20 – in RC-Action-3 expand "develop a regional equity strategy" to "develop and implement a regional equity strategy"

Regional Growth Strategy Policies
- Page 44 – expand MPP-RGS-6 from "consistent with the Regional Growth Strategy" to "consistent with the Regional Growth Strategy’s focus on Transit Focused Development"
- Page 45 – expand RGS-Action-3 from "buildable lands reporting" to "buildable lands reporting and methodology"
Environmental Policies
- Page 55 – expand MPP-En-1 from "develop region-wide environmental strategies" to "develop and implement region-wide environmental strategies"

Supporting Growth Through Concurrency
- Page 86 – delete MPP-DP-34 as inconsistent with MPP-DP-33
- Page 86 – expand MPP-DP-37 from "construction of new highways" to "construction of new or expanded"
- Page 87 – expand MPP-DP-50 from "develop concurrency programs and methods" to "develop concurrency programs and methods in conjunction with WSDOT"

Housing Policies
- Page 96 – expand MPP-H-2 by adding to “Provide a range of housing types ... within the region” by adding “with a particular focus on the ‘missing middle’

Economy Policies
- Page 107 – expand MPP-EC-18 from "a closer balance" to a much closer balance"

Transportation Policies
- Page 121 – insert in the last line of T-Action-1 "concurrency with state highways"

Additionally, regarding 2050 Implementation, we are particularly concerned that too much density in rural and unincorporated UGAs will interfere with the regional vision and ask that this issue be addressed in a more focused manner in the adopted version of VISION 2050.

Finally, the City of Tacoma wholeheartedly endorses the position taken by the City of Everett in their April 17, 2019 letter to you which states, in part:

“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.
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. Also, the "Economy Chapter" does not appear to recognize the green economy or green economic development as an economic development opp011unity. This should be added to the Economy Chapter."

Thank you again for this opportunity to comment.

Sincerely,

Elizabeth A. Pauli  
City Manager
RESOLUTION NO. 897

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF UNIVERSITY PLACE, WASHINGTON, CONVEYING COMMENTS TO THE PUGET SOUND REGIONAL COUNCIL REGARDING THE DRAFT VISION 2050 PLAN

WHEREAS, the Puget Sound Regional Council (PSRC) is the Metropolitan Planning Organization for the Central Puget Sound area including Snohomish, King, Pierce and Kitsap counties; and

WHEREAS, PSRC develops policies and coordinates decisions about regional growth, transportation and economic development planning within the four counties and over 80 jurisdictions, including the City of University Place, and

WHEREAS, PSRC is currently updating its VISION 2040 plan which is the regional guide for managing growth over the coming decades, and

WHEREAS, PSRC is currently seeking comments by September 16, 2019 on the Draft 2050 Plan, the updated version of VISION 2040, and

WHEREAS, The City of University Place has reviewed the Draft VISION 2050 Plan and has serious concerns regarding its top down approach to regional planning efforts

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF UNIVERSITY PLACE, WASHINGTON, AS FOLLOWS:

Section 1. To Provide Comments on the Draft VISION 2050 Plan. The City Council of the City of University Place hereby submit the comments attached hereto as Exhibit A to the Puget Sound Regional Council regard the Draft VISION 2050 Plan for their consideration.

Section 2. Effective Date. This Resolution shall take effect immediately upon its adoption.

ADOPTED BY THE CITY COUNCIL ON SEPTEMBER 3, 2019.

\(\text{Signature}\)

Kent Keel, Mayor

ATTEST:

\(\text{Signature}\)

Emetia Genetia, City Clerk

APPROVED AS TO FORM:

\(\text{Signature}\)

Matthew B. Kaser, City Attorney
September 3, 2019

Sent via email to:
vision2050@psrc.org

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

RE: Draft VISION 2050

Greetings:

The City of University Place has reviewed the Draft VISION 2050 Plan (hereafter “the Plan”).

The Plan begins with a bold vision statement to reduce our contributions to climate change, develop distinct and unique communities throughout the region with a diversity of people who have economic opportunities in a region that competes globally and sustains a high quality of life by 2050.

The vision statement calls for social and economic equity so that people in our region can attain resources and opportunities to improve their quality of life in healthy communities which promote physical, social and mental wellbeing for healthier and more active lives in a range of housing types which provide healthy, safe and affordable housing choices.

Our future transportation system provides a safe, affordable and efficiently connected network with a choice of mobility options which promote economic vitality and support the Regional Growth Strategy while protecting the environment. The vision directs the region to manage its natural resources, provide cost effective and coordinated public facilities and services to support growth, as well as to prepare to respond to potential impacts from natural and manmade hazards and protect rural areas.

It is a common planning practice to start with an audacious vision statement, where in reality growth related conditions in the Central Puget Sound (traffic, housing, jobs-housing imbalance) have only grown worse since VISION 2040 was adopted in 2008. Updating our local plans to accommodate a utopian future costs time and money in addition to the unknown costs to implement such a plan. While Seattle and King County benefit from most of the job growth, failure to provide enough affordable housing to offset the jobs-housing imbalance is deteriorating an already over-burdened transportation system. Meanwhile surrounding counties and their cities bear the brunt of the impacts associated with regional growth.

The same sentiments regarding the jobs-housing imbalance is expressed in the comment letter from the Pierce County Regional Council. The City of University Place clearly supports the points made in the letter.
Regional Collaboration

The Plan relies on regional collaboration as required by the Growth Management Act ("the Act"), providing consistency of local, countywide and regional plans for growth by laying out goals, policies and actions. The regional collaboration chapter calls for working with other jurisdictions, agencies, federally recognized tribes, adjacent regions, interest groups and others.

While the State has limited oversight of local plans, the Growth Management Act does not provide PSRC with oversight. Rather, the Act requires counties and the cities within them to create a planning framework to ensure that city and county comprehensive plans are consistent as stated below:

“The legislature recognizes that counties are regional governments within their boundaries, and cities are primary providers of urban governmental services within urban growth areas. For the purposes of this section, a "countywide planning policy" is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted pursuant to this chapter. This framework shall ensure that city and county comprehensive plans are consistent as required in RCW 36.70A.100. Nothing in this section shall be construed to alter the land-use powers of cities.” RCW 36.70A.210.

RCW 36.70A 210 (7) requires multicounty planning policies ("MPP") to be adopted by two or more counties each with a population of 450,000 or more, with contiguous urban areas.

Failure to adopt a countywide planning policy and by extension multicounty planning policies required under RCW36.70A 210 (3) may result in the imposition of a sanction or sanctions on a county or city within the county, as specified in RCW 36.70A.340. These sanctions, if imposed, shall be specified by the governor. The Act does not provide PSRC with the authority to impose sanctions in any form.

In our comments below regarding each chapter of VISION 2050, the City welcomes policies that ensure consistency between comprehensive plans. However, as stated in our comments on the VISION 2050 Supplemental Draft Environmental Impact Statement, growth management planning should take a bottom-up approach rather than top-down directives from the regional planning agency. Any multicounty planning policies and actions should provide guidance, and not conditions, for comprehensive plan certifications.

Regional Growth Strategy

The Draft Environmental Impact Statement prepared for the Plan analyzed three alternatives for managing growth: Stay the Course, Transit Focused and Reset Urban Growth. As proposed, the Plan leans toward the Transit Focused Growth alternative by adding High Capacity Transit Communities to the list of regional geography types.

The City is supportive of implementing the Transit Focused Growth alternative, which directs most of the growth near existing and planned high-capacity transit and to Regional Growth Centers. The City is
working with Pierce Transit to provide a hybrid bus rapid transit service to the University Place Regional Growth Center.

Describing the Regional Growth Strategy, the Plan includes the following statements:

"The Regional Growth Strategy is the cornerstone of VISION 2050, providing specific numeric shares to achieve a development pattern with fewer environmental impacts and a more compact urban form."

"The Regional Growth Strategy is comprised of two parts. First is a growth concept that builds on the foundation provided in the Growth Management Act, emphasizing the role of the urban growth area, regional growth centers, and areas with access to high-capacity transit in accommodating future population and employment. The second part—the numeric growth allocations by regional geographies—contains specific shares to distribute forecast growth."

"Within each county, the relative distribution of growth to individual cities and unincorporated places will be determined through countywide target-setting, taking into account local circumstances."

Under “Guidance for Aligning Growth Targets” the Plan states:

"PSRC will provide updated guidance and technical assistance to counties and cities as they develop countywide growth targets and prepare comprehensive plan updates. Guidance will address housing, regional centers, goals for transit-oriented development, support for jobs-housing balance, and other aspects of VISION 2050."

"In its review of comprehensive plans for certification, PSRC reviews consistency of the plan with adopted countywide growth targets. As VISION 2050 is implemented, PSRC will update the Plan Review Manual to provide additional guidance on planning for growth targets prior to comprehensive plan updates."

and

"If adjustments to countywide growth targets are needed, they should be coordinated through the countywide process."

These concepts are also incorporated into draft MPP RGS-2, RGS-3 and RGS-Action-3.

Please clarify what “consistent countywide targeting processes” means (i.e., a process consistent within a single county, or consistent across all four counties?) Please also clarify what “guidance” in this context means.

PSRC’s guidance for setting growth targets should recognize that unique sub-regional realities exist, e.g., geographical and environmental constraints, transportation access, external growth pressures such as a military installation; local growth trends differ from one jurisdiction and/or sub-region to another; and
relative distribution of growth to individual cities and unincorporated places will be determined through countywide target-setting, taking into account local circumstances.

The guidance provided should allow jurisdictions to adopt a target range like the Office of Financial Management’s Growth Management County Projections that provide low, medium and high projections. Allowing a target range rather than a hard and fast target number will provide flexibility in determining whether a jurisdiction has met adopted targets at the time of certification. Requiring a jurisdiction to initiate a countywide process to adjust growth targets because of unforeseen circumstances for plan certification is unreasonable.

Please consider amending MPP-RGS-3 as follows:

Allow jurisdictions to adopt low, medium and high targets to provide flexibility in modifying growth targets, considering unique differences within sub-regions and individual communities and during the process of plan certification.

Environment

The City is supportive of the efforts made by PSRC and others to protect and enhance the environment in the region and farther afield. The quality of the environment is what many in the region come to enjoy and is something on which we all depend. The MPP informs us that our priorities are for environmental and open space stewardship.

However, mandating jurisdictions to participate in watershed planning En-Action-3 and local open space planning En-Action-4 as a condition of plan certification is an example of PSRC overstepping its authority. Certainly, requiring participation in watershed and open space planning will be a hardship, especially on smaller jurisdictions without the resources to engage in these activities. Jurisdictions should be encouraged, not mandated, to participate in these planning efforts.

Climate Change

The City recognizes the impact climate change is having on the region and the world. Any actions we can take to curb and ultimately reduce our contribution of greenhouse gases into the atmosphere is essential to sustaining our quality of life and infrastructure investments. Being prepared for the consequences of climate change, whether natural or manmade, is important to maintain health and safety and to build resilient infrastructure.

The City is acting locally to build a compact Regional Growth Center consistent with the Regional Growth Strategy providing facilities for multimodal transportation and facilities for electric vehicles.

Development Patterns

The Development Patterns chapter builds on and supports the Regional Growth Strategy, recognizing places where growth has traditionally occurred, and taking advantage of existing infrastructure, public
facilities and services. The MPP in this chapter embrace the principles of smart growth, directing growth to high-quality, compact urban communities with a mix of uses, housing types and with multi-modal transportation opportunities, as well as to protect rural lands from urban sprawl.

Regarding MPP-DP-20 “Provide a regional framework for designating and evaluating regional growth centers.” Does this refer to the Regional Growth Center framework which has already been developed, or something new? MPP-DP-25 “Implement the adopted framework to designate countywide centers to ensure compatibility within the region” appears to suggest that the framework is complete and ready for implementation.

The City is pleased to see there is no reference to the hierarchy of centers and priority of funding.

Housing

“Housing affordability continues to be a major challenge for the region.”

Past zoning practices that amounted to exclusionary housing and the systematic exclusion for persons of color from home ownership opportunities in the past have created inequity and it would be naive to believe these practices do not continue today. However, as stated in the Plan it is the market that is most responsible for the affordable housing crisis we are in today.

The Plan states:

“Providing affordable units for very low-income residents and providing housing options for residents experiencing homelessness cannot be fully addressed by the private market alone. Public intervention is necessary to ensure housing units are affordable to households at the lowest income levels.”

The City would argue that providing affordable housing for moderate- and low-income households is also a challenge which is not being adequately addressed by the private sector.

Regarding displacement the Plan states:

“Regional growth centers and communities near transit are home to more people of color and higher concentrations of poverty than the region as a whole. As these central places connected by transit continue to grow and develop, residents and businesses who contribute to these communities should have the option to remain and thrive and take advantage of new amenities and services.”

The City welcomes the technical assistance PSRC is willing to provide; however, the City does not have the capacity to produce affordable housing. The City does have regulatory control and has made significant changes increasing density and height, promoting compact mixed-use developments near transit and providing density incentives to produce affordable housing.
However, the City does not welcome the oversight of the contents and implementation of its housing element as required under H-Action-4 which states:

“Local Housing Needs: Counties and cities will conduct a housing needs analysis and evaluate the effectiveness of local housing policies and strategies to achieve housing targets and affordability goals to support updates to local comprehensive plans. Analysis of housing opportunities with access to jobs and transportation options will aid review of total household costs.”

These requirements are already contained in the GMA. Placing them in the Plan gives PSRC oversight of our local planning efforts which we have argued should not be the role of PSRC.

Economy

The Plan states:

“Jobs-housing balance is a planning concept which advocates that housing and employment be close together to reduce the length of commute travel and number of vehicle trips. A lack of housing, especially affordable housing close to job centers, will push demand for affordable homes to more distant areas, increasing commute times and the percentage of household income spent on transportation costs. Housing policies encourage adding housing opportunities to job-rich places. Policies in the Economy chapter promote economic development to bring jobs to all four counties.”

“Nearly all this job growth in the region has been concentrated in a few urban areas. VISION 2050 calls for a better balance of job creation among the counties to broaden opportunity and create a better jobs-housing balance.”

Under VISION 2040, the regional jobs-housing balance has grown worse, as evidenced by the daily congestion on our area freeways as persons driving out of the housing market in King County commute to work “in a few urban areas” primarily in Seattle and King County.

As the region grows both in population and jobs, the jobs-housing balance will get worse until the market responds to gridlock and housing shortages and chooses to locate where their workers can afford to live. Improvements in our transportation system and housing supply are critical to solving this problem.

The City supports the policies in this chapter and hope that their implementation will create a better jobs-housing balance.

Regarding proposed EC-Action-4, the City recommends the following amendment:

   Economic Development Elements: Cities and counties will update (or adopt) their economic development element – tailored to meet the jurisdiction’s unique needs and leveraging public investments – as specified in the Growth Management Act, when conducting the
expected 2023/24 Comprehensive Plan update, provided that funding is made available by the State Legislature as provided in RCW 36.70A.070(9).

Transportation

"VISION 2050 incorporates a renewed focus on locating growth near current and future high-capacity transit facilities, with a goal for 65% of the region’s population growth and 75% of the region’s employment growth to be located in regional growth centers and areas within walking distance of high-capacity transit."

"As the region continues to grow and becomes more congested, transportation investments that improve mobility are key. These include completing a regional high-capacity transit network with seamless connections to local transit systems and creating robust multimodal access to the overall transit network."

The City believes it is unrealistic to expect that 75% of growth will occur within ½ mile of a High Capacity Transit throughout the region. This may be possible only in King County, considering the location and rate at which High Capacity Transit is being rolled out.

Unfortunately, the region will not be able to build its way out of congested roads. Providing more transit opportunities will be the most effective way of alleviating regional traffic congestion. Ensuring the transit system is well coordinated will encourage more use of the system. Currently, if a train or bus is missed because of traffic delaying a connecting bus or train, a commuter often must wait an extended period to complete their trip.

The City supports fast passage only ferries between metropolitan centers with access to the Puget Sound. The waterways are free and new services should be able to roll out faster and cheaper than building more freeway lanes and land-based high capacity transit systems.

Public Services

Regarding MPP-PS-10 “Serve new development within the urban growth area with sanitary sewer systems or fit it with dry sewers in anticipation of connection to the sewer system.” The Pierce County Countywide Planning Policies were recently amended to remove the requirement that dry sewer lines be installed in anticipation of eventual hookup to sanitary sewers. This policy was removed because dry sewer lines which are not used and maintained fall into disrepair and need to be rebuilt when sewer does arrive.

Installing dry sewer lines adds cost to housing without providing the service. An alternative may be to require hookup when sewers arrive via a no-protest ULID conditioned on future lot owners.
Implementation

Under Policy and Plan Review the Plan states:

“PSRC’s process for the review of countywide, local, and transit agency plans is established by the consistency requirements of the Growth Management Act, as well as state-required guidelines for evaluating comprehensive plans and directives in PSRC’s Interlocal Agreement.”

“The multicounty planning policies in VISION 2050 serve as the region’s guidelines and principles.”

“Certification of plans is a requirement for jurisdictions and agencies that intend to apply for PSRC funding or proceed with projects submitted into the Regional Transportation Improvement Program.”

and

“PSRC reviews and certifies the transportation-related provisions of local comprehensive plans based on three things:

1. Established regional guidelines and principles
2. The adopted long-range Regional Transportation Plan
3. Transportation planning requirements in the Growth Management Act”

As stated in the beginning of this letter, we support PSRC’s role in providing guidance to ensure consistency in Comprehensive Plans throughout the region. In this chapter, the Plan clearly states providing guidance is the purpose of and responsibility of PSRC. More specifically, PSRC’s role is to review and certify transportation-related provisions of local comprehensive plans.

During the last update and certification process, we understand there was a lot of consternation regarding the level of oversight PSRC took on as opposed to providing guidance. Recognizing this, PSRC produced the Taking Stock Report with the help of area stakeholders.

We trust PSRC will use the Taking Stock Report to improve their plan review process during future comprehensive plan updates and limit their review to transportation-related provisions, as was the case prior to this latest cycle of plan certifications.

Thank you for the opportunity to comment on the Draft VISION 2050 Plan. We look forward to seeing the final plan adopted and implemented as a guidance document.
Sincerely,

[Signature]

Kent Keel
Mayor

Copy:   City Council
       City Clerk