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.

### Countywide and Joint Member Letters

<table>
<thead>
<tr>
<th>Name</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>King County Joint Letter</td>
<td>O - 3</td>
</tr>
<tr>
<td>Pierce County Regional Council</td>
<td>O - 10</td>
</tr>
<tr>
<td>Ports of Everett, Bremerton, Seattle, Tacoma, Northwest Seaport Alliance</td>
<td>O - 19</td>
</tr>
<tr>
<td>Snohomish County Tomorrow</td>
<td>O - 27</td>
</tr>
<tr>
<td>Sound Cities Association</td>
<td>O - 34</td>
</tr>
</tbody>
</table>

### Agencies and Organizations

<table>
<thead>
<tr>
<th>Name</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>37th Legislative District Environment &amp; Climate Caucus</td>
<td>O - 36</td>
</tr>
<tr>
<td>350 Seattle (1)</td>
<td>O - 37</td>
</tr>
<tr>
<td>350 Seattle (2)</td>
<td>O - 44</td>
</tr>
<tr>
<td>ACES Northwest Network</td>
<td>O - 45</td>
</tr>
<tr>
<td>Alderwood Water &amp; Wastewater District</td>
<td>O - 56</td>
</tr>
<tr>
<td>Bellevue Downtown Association</td>
<td>O - 57</td>
</tr>
<tr>
<td>Bethel School District</td>
<td>O - 58</td>
</tr>
<tr>
<td>Climate Solutions (1)</td>
<td>O - 60</td>
</tr>
<tr>
<td>Climate Solutions (2)</td>
<td>O - 65</td>
</tr>
<tr>
<td>Communities of Concern Commission</td>
<td>O - 66</td>
</tr>
<tr>
<td>Economic Alliance Snohomish County (EASC)</td>
<td>O - 67</td>
</tr>
<tr>
<td>El Centro de la Raza (1)</td>
<td>O - 72</td>
</tr>
<tr>
<td>El Centro de la Raza (2)</td>
<td>O - 74</td>
</tr>
<tr>
<td>Emerald Alliance</td>
<td>O - 75</td>
</tr>
<tr>
<td>Forterra</td>
<td>O - 78</td>
</tr>
<tr>
<td>King County’s Rural Area Unincorporated Council (UAC) &amp; Unincorporated Area Associations (UAA)</td>
<td>O - 79</td>
</tr>
<tr>
<td>Kitsap Public Health District</td>
<td>O - 125</td>
</tr>
<tr>
<td>Laborers Local 242</td>
<td>O - 126</td>
</tr>
<tr>
<td>League of Women Voters of Snohomish County</td>
<td>O - 127</td>
</tr>
<tr>
<td>League of Women Voters of Washington</td>
<td>O - 129</td>
</tr>
<tr>
<td>Master Builders Association of King &amp; Snohomish Counties</td>
<td>O - 131</td>
</tr>
<tr>
<td>Master Builders Association of Pierce County</td>
<td>O - 137</td>
</tr>
<tr>
<td>Pilchuck Audubon Society</td>
<td>O - 139</td>
</tr>
<tr>
<td>Pomegranate Center</td>
<td>O - 140</td>
</tr>
<tr>
<td>Puget Sound Partnership</td>
<td>O - 141</td>
</tr>
<tr>
<td>Puget Sound School Coalition – King County Component</td>
<td>O - 142</td>
</tr>
<tr>
<td>Save Black Diamond</td>
<td>O - 145</td>
</tr>
<tr>
<td>Sierra Club Washington</td>
<td>O - 149</td>
</tr>
<tr>
<td>Snohomish County Camano Association of Realtors</td>
<td>O - 161</td>
</tr>
<tr>
<td>Snohomish County School Districts Group (1)</td>
<td>O - 162</td>
</tr>
<tr>
<td>Snohomish County School Districts Group (2)</td>
<td>O - 168</td>
</tr>
<tr>
<td>Snohomish County School Districts Group (3)</td>
<td>O - 169</td>
</tr>
<tr>
<td>Snohomish County School District Group (4)</td>
<td>O - 170</td>
</tr>
<tr>
<td>Snohomish School District</td>
<td>O - 171</td>
</tr>
<tr>
<td>Sound Transit</td>
<td>O - 172</td>
</tr>
<tr>
<td>Tacoma-Pierce County Health Dept.</td>
<td>O - 174</td>
</tr>
<tr>
<td>Transportation Choices Coalition</td>
<td>O - 184</td>
</tr>
<tr>
<td>Washington Association of Sewer and Water Districts</td>
<td>O - 196</td>
</tr>
<tr>
<td>Washington Dept. of Commerce</td>
<td>O - 199</td>
</tr>
<tr>
<td>Washington Dept. of Ecology</td>
<td>O - 203</td>
</tr>
<tr>
<td>Washington Dept. of Transportation</td>
<td>O - 212</td>
</tr>
<tr>
<td>Welcoming Wallingford</td>
<td>O - 215</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Businesses</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kirkland Sustainable Investments</td>
<td>O - 216</td>
</tr>
<tr>
<td>Natural and Built Environments LLC</td>
<td>O - 217</td>
</tr>
<tr>
<td>Sustainable Redmond LLC</td>
<td>O - 219</td>
</tr>
<tr>
<td>Toyer Strategic Consulting</td>
<td>O - 220</td>
</tr>
</tbody>
</table>
September 16, 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:

King County continues to successfully implement VISION 2040. King County has created vibrant urban centers, protected natural resource lands and rural areas, and directed public investments supporting efficient use of land by focusing the majority of growth into cities and the Urban Growth Area.

King County intends to stay on this path with VISION 2050. The county and its cities support the plan’s common planning framework because it envisions a sustainable, equitable future for all our residents. The rest of the central Puget Sound region must continue this foundational work.

However, the county’s success in growth management has not come without challenges. Our ability to continue on this path and to implement VISION 2050 will determine its long-term success. Local governments face financial challenges that may impede their capacity to fully implement VISION 2050. The funding structure of local governments at both the municipal and county levels must be addressed to make VISION 2050 a reality while preventing deepening racial and social inequities.

King County is overall very supportive of the Draft VISION 2050 Plan as it successfully addresses the challenges of accommodating another 1.8 million people while guiding the region to a more sustainable and equitable future. VISION 2050 can be further strengthened to adapt to a rapidly changing region as noted below.

The growth pattern should maintain the integrity of the Urban Growth Area and prioritize cities and centers for accommodating growth.

Guided by the state Growth Management Act, King County and the cities have for the past 25 years accommodated nearly all new housing and jobs in cities and designated centers within the Urban Growth Area. This is a pattern that can be achieved regionally as the region builds out its high-capacity transit system.

Draft VISION 2050 Plan policies and actions significantly advance this approach to managing growth. The Transit Focused Growth alternative anticipates the best environmental outcomes across a range of areas including health, climate change, housing, and transportation if displacement risk for communities most in need is addressed. The additional policy proposals below emphasize the plan’s approaches for
concentrating new development, providing for locally-tailored growth targets and implementation, and discouraging growth in rural areas not served by transit:

Additional Growth Pattern Policy Proposals:

• The adopted Regional Growth Strategy should mirror the Transit Focused Growth alternative in all four counties by reducing allocated population growth in rural areas, in unincorporated urban areas lacking high capacity transit, in areas where residential development results in significant negative impacts to transportation and the environment, and in areas where such growth would increase pressure on the existing UGA boundary.

• Include strong support for tools that can encourage housing and employment growth consistent with the Regional Growth Strategy. These tools include transfer or purchase of development rights, infrastructure policies, land use regulations, and economic incentives.

• Provide for countywide processes to set locally tailored growth targets that are consistent with the Regional Growth Strategy in VISION 2050 and coordinated across the region.

• Land use plans should be consistent with growth targets while taking into account impacts on other public systems, including infrastructure and school capacity, and be coordinated with policies that support concurrent investments to meet the needs of growing communities.

VISION 2050 should advance racial and social equity outcomes as a cornerstone principle of the plan.

Achieving VISION 2050 depends on continuing to dismantle inequitable land use patterns that constrain quality of life for communities of color, Native and Indigenous peoples, low-income households, and immigrants and refugees. Policies and implementation strategies should be rooted in achieving equitable health, housing, economic, and environmental outcomes for all residents. Equity issues are also addressed in the housing, climate change, and hazards themes further in the letter.

Draft VISION 2050 Plan policies and actions are positioned to significantly advance this issue. The proposal to develop the Regional Equity Strategy, as called-for in RC-Action-3, is a start to moving the region to a more equitable future. The policy proposals below emphasize the plan’s approaches to acknowledging ancestral lands, creating opportunities, reducing disparities, and mitigating displacement:

Additional Equity Policy Proposals:

• Ensure that communities and places most negatively impacted by racial and social inequities hold power and meaningfully influence regional policies and plans that integrate their perspectives, concerns, solutions and values to drive progress on racial and social equity.
• Continue to work on displacement risk and opportunity mapping; monitor, assess and promote strategies for community stabilization and neighborhood business retention.
• Conduct and make widely available for jurisdictional use, a baseline assessment of distributional equity at region-wide, countywide, and municipal scales that includes how equitably opportunities and burdens are distributed and contribute to equitable social, economic, health, and environmental outcomes.
• Establish a monitoring program to measure progress toward racial and social disparity reduction.
• Develop an equity impact tool for evaluating PSRC board and work decisions and informing ongoing engagement activities.

**VISION 2050 should allow for a variety of housing types while addressing housing affordability for all residents, especially for those in the lowest income categories.**

Increased attention on affordable housing and housing diversity is a crucial part of achieving inclusive growth. Intentional action on housing affordability is necessary to ensure that people are not pushed out of the region as housing prices continue to rise.

Draft VISION 2050 Plan policies and actions significantly enhance the approach to this issue. The additional policy proposals below will emphasize the plan’s focus on low- and very-low-income households, preserving long-term affordable housing options, reducing households’ cost burden, and supporting interjurisdictional cooperation:

**Additional Housing Policy Proposals:**

• Ensure housing supply is accessible to job centers and is priced to match anticipated wages. Jurisdictions should be encouraged to consider expected incomes from current and future jobs as they conduct housing planning activities.
• The Regional Needs Assessment should quantify the need for affordable housing that will eliminate cost burden and racial disproportionality in cost burden for all economic segments of the population, including those earning at or below 80 percent of Area Median Income throughout the region. This will provide necessary structure and focus to regional affordable housing discussions.
• King County invites PSRC to work with the King County Growth Management Planning Council’s newly-launched Affordable Housing Committee in implementing Regional Housing Strategy H-A-1. This countywide advisory body recommends actions and assesses progress toward implementation of the countywide Regional Affordable Housing Task Force Five-Year Action Plan. The Committee provides coordination and accountability for affordable housing efforts across King County.

**VISION 2050 should reduce greenhouse gas emissions, address hazard mitigation, and promote regional open space.**
Climate change is a paramount challenge. It has far-reaching consequences for our communities, in particular our most vulnerable populations, including higher temperatures, rising seas, decreasing mountain snowpack, and less streamflow during summer months.

Draft VISION 2050 Plan policies and actions move us toward meeting our climate change goals and significantly increase the focus on climate change, emphasized by the new chapter. These additional policy proposals below will emphasize the collaborative work of King County, its fifteen partners representing more than 1.6 million residents, and the Port of Seattle, in the King County-Cities Climate Collaboration (K4C) to coordinate and enhance effective local government climate and sustainability action:

Additional Climate Policy Proposals:

- Establish numeric goals for reduction of emissions of greenhouse gases in the climate change goal statement by using the adopted targets of the Puget Sound Clean Air Agency.
- Address the impacts of climate change on sea-level-rise, with its costly consequences for marine shoreline communities and counties.
- Acknowledge that the right land use pattern and the built environment approach can be major factors in addressing climate change as both mitigation and adaptation strategies.
- Expand the Four-Part Greenhouse Gas Strategy, as called-for in CC-Action-1, to include the emissions footprint associated with energy use by residential and commercial buildings, supporting infrastructure, and public facilities.
- Aggressively implement the Four-Part Greenhouse Gas Strategy to ensure these actions are incorporated into all regional plans.
- Expand CC-Action-3 to include more than greenhouse gas emissions from the transportation sector and encompass the built environment comprehensively.
- Incorporate policies and activities related to climate preparedness that reduce climate change impacts on cities and counties, especially for those whose risk and vulnerability is greatest.

Hazard mitigation and recovery are an important regional issues that should receive greater consideration in VISION 2050. Natural hazards do not respect jurisdictional boundaries and have the potential to greatly affect the region.

Draft VISION 2050 Plan policies and actions significantly enhance the approach to this issue. The additional policy proposals below will emphasize the Draft Plan’s focus on long-term resilience to natural hazards including earthquakes; reducing vulnerabilities and prioritizing investments for residents who are most vulnerable; and engaging in regional resilience and recovery planning:
Additional Hazards Policy Proposals:
- Identify the need for investment in building a base level of resilience throughout the region, including investments in reducing risks to buildings and public infrastructure, especially for those whose vulnerability is most acute.
- Ensure that the built environment, both new and existing, across the region is resilient to natural hazards, particularly earthquakes and flooding.

Open space is well addressed in the Draft VISION 2050 Plan, identifying, preserving and enhancing regional open space networks. These additional policy proposals below will emphasize implementation of the Regional Open Space Network and Conservation Plan:

Additional Open Space Policy Proposals:
- Encourage the acceleration of open space protection and creation by local governments, prioritizing areas with higher racial and social inequities, in light of the rapid growth expected in the region. This will save significant funding over the long term and ensure that the region’s most vital conservation lands are protected before they are lost to development or priced out of reach to local governments.
- Add an action directed at local governments stating that counties and cities should work together to develop a 30-year funding strategy and action plan. King County is now working on this approach with the recent passage of the Parks and Open Space levy, accelerating the pace of open space protection in the Regional Open Space Conservation Plan.

VISION 2050 should address the financial constraints facing counties and municipalities implementing VISION 2050.

King County’s successful growth management implementation has come with fiscal challenges. Current revenue sources to implement VISION 2050 are insufficient to support necessary planning efforts and infrastructure improvements and preservation across all jurisdictions. The ability to have a stable funding source for the rural area and primarily residential communities has been compromised. Annexations and incorporations along with limited funding sources have led to inequitable impacts to communities as well as financial concerns for both the county and cities.

Draft VISION 2050 Plan policies and actions increase focus on the financing challenges facing local governments. These additional policy proposals below will emphasize the Draft Plan’s approaches to funding regional growth and manufacturing/industrial centers; directing subregional funding; aligning housing funding with centers; exploring new funding for planning to implement the Regional Growth Strategy and for infrastructure improvements and services; and joint planning for urban unincorporated areas:
Additional Public Financing Policy Proposals:

- Consider 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.
- Add state funding mechanisms to the sources of funding to explore for achieving the regional vision and implementing the Growth Management Act.
- Provide a policy basis for regional collaboration to work with the Washington State Legislature to secure additional annexation and incorporation funding.
- Modify RC-Action-5 to include funding for local and regional implementation planning and adding schools to the list of areas needing funding.
- Modify DP-Action-6 to add that PSRC will support local and regional efforts to develop state legislation to remove barriers that hinder progress for annexation and incorporation.

Thank you for your consideration.

Sincerely,

Dow Constantine
King County Executive

Claudia Balducci
King County Council
District Six

Joe McDermott
King County Council
District Eight

Dana Ralph
Mayor, City of Kent

Penny Sweet
Mayor, City of Kirkland

Rick Rudometkin
City Manager, City of Sammamish
Abel Pacheco  
Seattle City Councilmember  
District Four

Mike O’Brien  
Seattle City Councilmember  
District Six

Will Hall  
Mayor, City of Shoreline

Chris Roberts  
Shoreline City Council
September 12, 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:

The Pierce County Regional Council (PCRC) was created to ensure planning between Pierce County and its cities and towns was accomplished in a coordinated, consistent manner. The Council is comprised of elected officials from Pierce County, each of its 23 cities and towns, and the Port of Tacoma. The primary responsibility of the PCRC is to ensure that the Growth Management Act requirements are coordinated within the County and the region.

This letter discusses the draft VISION 2050 (V2050) released for public review by the Puget Sound Regional Council (PSRC) in July 2019; the PCRC discussed draft V2050 at its summer 2019 meetings and voted on September 12 to submit the following comments as a body. Through these comments, the PCRC is requesting edits and additional language/policies that address:

1) Jobs-Housing Balance,
2) Preservation of Manufacturing/Industrial Centers, and
3) the Role of Major Military Installations.

Thank you for your consideration of these comments.

JOBS-HOUSING BALANCE

At page 26, draft V2050 states that the “Jobs-housing balance compares the relative amount of housing and employment in an area, with an aim toward reducing long commute trips. Across the region, the strategy generally plans for improved jobs-housing balance compared to today.” These statements reflect the fact that VISION 2040 implementation has not resulted in (or even moved toward) an even, region-wide jobs-housing balance.

Vision 2040 incorporated an economic development model with jobs and housing growth throughout the region. The Regional Growth Strategy stated in part:
VISION 2040 envisions a future where:
• A better balance of job locations and housing is achieved, facilitated, and supported by incentives and investments.
• Meaningful steps are taken to reduce carbon emissions and minimize the region’s contribution to climate change.

Under the draft V2050, the following concepts (among others) are prioritized:

VISION 2050 envisions a future where the region:
• Achieves a better balance of jobs and housing across the region.
• Within cities, creates and supports centers to serve as concentrations of jobs, housing, services, and other activities.

Draft V2050 continues:
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. Jobs-housing balance compares the relative amount of housing and employment in an area, with an aim toward reducing long commute trips. Across the region, the strategy generally plans for improved jobs-housing balance compared to today. Access to good paying jobs outside of King County is important for regional mobility, environmental outcomes, and community development.

It’s difficult to think of a major social problem in the Puget Sound unrelated to the concentration of employment and wealth in jurisdictions that have not planned or allowed for enough housing to accommodate that economic growth. The existing and worsening jobs-housing imbalance has contributed to increased homelessness, increased transportation costs, negative impacts to health, and time away from communities and families.

Housing location is just as key as job location to achieving a jobs-housing balance. 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. The draft VISION 2050 language above should be amended to read:

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 while also shifting expected housing growth into Seattle, Bellevue, and other King County urban areas with acute affordable housing shortages. Jobs-housing balance compares the relative amount of housing and employment in an area with an aim toward reducing long commute trips. Across the region, the strategy generally plans for improved jobs-housing balance compared to today. Access to living wage jobs outside of King County, and access to affordable housing within King County, is important for regional mobility, environmental outcomes, and community development.
Figure 4.1-1. Jobs-Housing Index, 2050

Stay the Course | Transit Focused Growth | Reset Urban Growth
---|---|---
West | 0.77 | 0.81
East | 1.29 | 1.29
South | 1.12 | 1.03
Pierce | 0.78 | 0.80

Source: PSRC
Note: An index of 1.0 indicates a regional average ratio between jobs and housing. Subareas within King County include “Sea-Shore” (Seattle, Shoreline), “East King” (Mercer Island, Newcastle, and all cities north to the county line, east of Lake Washington), and “South King” (Renton, Tukwila, Burien, and all cities south to the county line). Jobs-housing ratios indexed to the regional average.

The February 2019 Draft SEIS graphic “2050 Jobs-Housing Index” (see above) demonstrates the anticipated jobs-housing imbalance throughout the region under each originally proposed Regional Growth Strategy (RGS) Alternative. Under all three alternatives depicted in the graphic, King County would continue to experience more than 1.3 jobs per housing unit, with the Seattle-Shoreline area adding over 1.7 jobs per housing unit; on the other hand, Snohomish, Pierce, and Kitsap Counties would all experience less than 1 job per housing unit.

The Preferred Alternative included in draft V2050 has essentially the same indices as the Transit Focused Growth. Figure 4.1-1 demonstrates that as currently drafted, the Plan will assume - and even plan for - a continued jobs-housing IMBALANCE and continued worsening greenhouse gas emissions due to long home-work commutes.

This growth pattern in King County jurisdictions where robust job growth has occurred runs counter to the GMA. As stated in RCW 36.70A.070, local housing elements should include the following components:

1. an inventory and analysis of existing and projected housing needs,
2. goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing,
3. identification of sufficient land for a range of housing types to match community needs, and
4. adequate provisions for the needs of all economic segments of the community.

As jobs are located within a city or county, that jurisdiction must plan to provide the affordable housing sufficient for those jobs.

The V2050 strategy regarding where to distribute future growth in the region is a matter of policy. Given the repeated regional recognition of a need to correct the current Puget Sound jobs-housing balance,
the Regional Growth Strategy should strive toward an index of 1.0 in each subarea of all four PSRC
counties, and identify actions and policies needed in each subarea to achieve that balance.

Housing prices are affected by supply and demand. King County housing prices reflect the short supply
and severe unmet demand for housing in areas that have experienced the most significant amount of
job growth, specifically in “SeaShore” and “East King” subareas. Those with wages too low to afford
housing prices there are forced to commute ever further away into parts of the region that have
benefitted least from the economic growth experienced in King County. Housing shortages for those
who work in, but cannot afford to live in, urban King County have contributed to the increasing
congestion on major transportation routes into and out of King County.

V2050 must counter, rather than exacerbate, this inequity; it must include policies that promote job
creation outside the subareas with the highest jobs-housing index and simultaneously promote housing
production within the Seattle-Shoreline and urban East King County areas to help address the existing
imbalance.

PSRC must establish a standard 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 DSEIS will occur as
anticipated, and there will be a major internal inconsistency within V2050 between the RGS and the
goals.

The jobs-housing imbalance also contributes to greenhouse gas emissions produced from long distance
automobile commuting patterns and population displacement. Without a jobs-housing balance
throughout the region, population will continue to grow in smaller, suburban and more rural
communities, thereby increasing CO2 emissions, stormwater pollution, reducing habitat and open
space, while also displacing lower-income people least prepared to handle additional transportation
costs.

address the jobs-housing balance at some level; numerous other policies address housing specifically.
Each of these policies should anticipate not only jobs locating where housing exists, but also housing
locating where jobs exist. Otherwise, the focus and strategy behind establishing and promoting regional
centers will be impeded.

Page 96:
Amend Housing Policy MPP-H-1 to read:

Plan for housing supply, forms, and densities to meet the region’s current and projected needs
consistent with the Regional Growth Strategy and to advance job-housing balance to the maximum
extent feasible.

Amend Housing Policy MPP-H-6 to read:

Develop and provide a range of housing choices for workers at all income levels throughout the region in
a manner that promotes accessibility to jobs and provides opportunities to live in proximity to work.
High concentrations of jobs are located in manufacturing/industrial centers; careful consideration
for protection of industrial land must be given when considering housing in proximity to a Manufacturing Industrial Center (MIC).

Page 97:
Amend Housing Actions H-Action-1 to read:

Regional Housing Strategy: PSRC, together with its member jurisdictions, state agencies, housing interest groups, housing professionals, advocacy and community groups, and other stakeholders will develop a comprehensive regional housing strategy to support the 2023-24 local comprehensive plan update. The housing strategy will provide the framework for regional housing assistance (see H-Action-2, below) and shall include the following components:

- A regional housing needs assessment to identify current and future housing needs to support the regional vision and to advance job-housing balance to the maximum extent feasible;
- Strategies and best practices to promote and/or address: housing supply, the preservation and expansion of market rate and subsidized affordable housing, housing in centers and in proximity to transit, jobs-housing balance, and the development of moderate-density housing options; and
- Coordination with other regional and local housing efforts

REGIONAL COLLABORATION
Page 17:
Add reference to Ports as follows:

Ports
Our region includes four Seaports and an international Airport. These significant public facilities include irreplaceable infrastructure and provide water and air access for people and goods to our region. Much of the region’s economic vitality is tied to our ports. Coordinating planning efforts to protect our ports and related land uses and access is a regional priority.

Page 26:
Amend the discussion regarding “Access to High-Capacity Transit” as follows:

The central Puget Sound region is investing heavily in its high-capacity transit system and greatly expanding light rail, bus rapid transit, and passenger ferry service. Since the initial Regional Growth Strategy in VISION 2040 was adopted, the region’s voters approved two major Sound Transit ballot measures and other transit agencies have significantly expanded planning for high-capacity transit. VISION 2050 incorporates a renewed focus on locating growth near current and future high-capacity transit facilities. Rail, ferry, and bus rapid transit station areas are ideal for increased density, new residences, and businesses—referred to as transit-oriented development. Transit-oriented development near stations located in manufacturing/industrial centers (MICs) will look different than development in other centers to maintain the region’s focus on protecting and developing our industrial lands, jobs, and the region’s overall economic vitality.

Allowing for greater employment and population growth within walking distance to high-capacity transit promotes the use of the region’s transit systems and reduces the
number of trips that require a personal vehicle. VISION 2050 includes 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 within walking distance of high-capacity transit.

**PSRC Guidance for Local Governments**

Under “Guidance for Aligning Growth Targets” starting at page 43 of the draft V2050, language 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.

This concept is incorporated into draft MPP RGS-2, RGS-3 and RGS-Action-3 as well.

Please clarify what “consistent countywide targeting processes” in MPP RGS-2 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.

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 and actual growth that are beyond a jurisdiction’s control.

Page 44:
Amend MPP-RGS-3 as follows:

Allow flexibility in establishing and modifying countywide growth targets considering unique differences within sub-regions and individual communities, provided the growth targets support the Regional Growth Strategy.
Amend MPP-RGS-7 as follows:

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 to achieve the regional goal, focus development near high-capacity transit, provided that high concentrations of housing are not appropriate on industrially-zoned lands.

ANNEXATION AND POPULATION TARGETS
Page 45:
When a city annexes an unincorporated area, that city should not be considered out of compliance with V2050. Please add a proposed MPP-RGS-14 as follows:

Existing jobs and population within the urban growth area annexed into a town or city shall not be considered population and/or job growth in determining compliance with the adopted growth targets for that city or town. When areas are annexed, the growth target for that jurisdiction should be modified consistent with the Regional Growth Strategy to transfer the future development capacity that had been categorized in the urban unincorporated geography to that city or town.

UNFUNDED MANDATES ON LOCAL GOVERNMENTS
Page 108:
To be consistent with Legislative intent and state statute, please amend proposed EC-Action-4 as follows:

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 to small jurisdictions by the State Legislature as provided in RCW 36.70A.070(9).

MILITARY INSTALLATIONS WITHIN PSRC AREA
Page 39:
Amend as follows:

Military Installations
Military installations play an important role in the central Puget Sound region’s economy. Washington State has one of the highest concentrations of military personnel claiming residence, with the majority of personnel stationed at installations in the central Puget Sound region. Nine installations of various sizes are located in the region. Military employment greatly benefits the region’s economy and generates billions of dollars in economic impact.

Military bases vary greatly in size, population density and character and often integrate industrial uses, commercial and service uses, and residential development. Installations are not required to plan under the Growth Management Act, and the Regional Growth Strategy does not allocate forecasted regional growth to these areas. However, installations serve as hubs for both employment and population, and it is important to work together on growth planning in and around bases. Because “PSRC recognizes the relationship between regional growth patterns and military installations, and recognizes the importance of military employment and personnel all [sic] aspects of regional planning,” V2050 will, for the first
time in the region’s planning, establish Major Military Installations as a regional geography. In concert with that recognition, it is appropriate to promulgate policies and implementing actions.

Between 2012 through 2019, traffic congestion has been the number one concern of military employees living in the Joint Base Lewis-McChord (JBLM) area. According to a 2018 SSMCP survey of the JBLM workforce, 71% of active duty service members live off-base and commute to work. If Department of Defense (DOD) civilian personnel are added, 87% of the JBLM workforce live off-base.

According to JBLM traffic monitoring devices, in 2018 about 57,000 vehicles per day routinely entered the installation during the work week. This total should be doubled to well over 100,000 per day to account for vehicles exiting Access Control Points. Mission readiness can be severely impacted when roadways providing access to and from the installation become impassable or heavily congested.

Many Washington residents believe the traffic congestion along the I-5 JBLM corridor is caused by the installation’s presence. However, in fact, I-5 has not been widened in the study area since 1975 and is inadequate to meet today’s civilian population demand. Between 1970 and 2010, the population of Washington State grew by 97 percent, Pierce County’s grew by 95 percent, and Thurston County’s grew by 228 percent. [PSRC should incorporate similar language regarding the area around Kitsap County’s and Snohomish County’s military installations.]

The State of Washington has recognized traffic volumes are negatively impacting commerce in the region and has focused some highway construction effort along the JBLM corridor on Interstate 5 (I-5). The JBLM Congestion Relief Project, funded by the state at $495,000,000, hopes to help alleviate some of the congestion on a five mile stretch of I-5 that bisects JBLM. The work on I-5, however, will not address the adjacent arterial road network which will continue to be a problem.

Through an ongoing Transportation Working Group and specifically through efforts funded September 2019 - September 2020 by a federal Office of Economic Adjustment (OEA) grant, the South Sound Military & Communities Partnership (SSMCP) is leading efforts to analyze local transportation impacts in the vicinity of JBLM.

The critical task recognized by both the State and SSMCP is to assess local transportation networks and multi-modal traffic alternatives in order to recommend, prioritize, and develop cost estimates for identified options to alleviate traffic congestion on local road networks in the vicinity of JBLM. The SSMCP traffic study will document trouble areas, offer mitigation strategies, prioritize selected projects, and recommend funding approaches to remedy the problem.

Major Military Installations are defined by PSRC as installations with more than 5,000 enlisted and service personnel. This regional geography is designed to promote coordination between the military installation, countywide planning efforts, and neighboring jurisdictions to plan for growth, address regional impacts and enhance multimodal transportation options. Military installations are major employers, associated with transportation congestion, housing and school capacity demand, and regional designation can help work to alleviate impacts.” Per the Regional Centers Framework, regional expectations for Major Military Installations include:

- Ongoing coordination between the military installation, countywide planning forum, and neighboring jurisdictions regarding planned growth, regional impacts, and implementation of multimodal transportation options.
• Support for multimodal commute planning and mode split goals for the installation.
• Completed Joint Land Use Study or similar coordinated planning effort.

In addition, include the following multicounty planning policies in V2050:

MML-1: Recognize that military installations can have beneficial economic impacts but can also result in land use, housing, and transportation challenges for adjacent and nearby communities.

MML-2: While the region does not fund infrastructure improvements within Major Military Installations (MMI’s), it should assist proximate communities to address the challenges associated with MMI’s through planning and infrastructure development.

MML-Action-1: PSRC will support and assist communities proximate to MMI’s to meet their GMA obligations to plan for impacts associated with military installations.

MML-Action-2: PSRC will incorporate information, based on a completed local transportation study, how a project benefits transportation to and from a military installation into decision criteria for infrastructure funding allocations.

MML-Action-3: PSRC will coordinate with other agencies and NGOs regarding state level advocacy efforts for state and federal funding and policy support for military-community compatibility.

**REGIONAL GEOGRAPHY DESCRIPTION**

Page 27:

Amend the description of the Urban Unincorporated Area geography as follows:

Urban Unincorporated Areas capture a wide variety of urban lands, both lightly and heavily developed. These areas may be served by local transit and may include areas identified as potential annexation or incorporation areas.

**GLOSSARY**

The Glossary should be included as part of the main V2050 document rather than provide separately. Please attach it directly to V2050. Within the Glossary for V2050, amend the definition of “Jobs-Housing Balance” as follows:

A planning concept which advocates that housing and employment be located closer together, with an emphasis on matching housing options with wages of nearby jobs, so workers have shorter commutes or can eliminate vehicle trips altogether.

Again, we thank you for the opportunity to comment. Vision 2050 plays a vital role in the balancing of our region’s growth and development, and we appreciate the consideration of these comments moving forward.

Regards,

[Signature]

Tom Swanson, Chair
Pierce County Regional Council
September 16, 2019

The Honorable Ryan Mello  
Chair, Growth Management Policy Board  
Puget Sound Regional Council  
1011 Western Ave., Ste. 500  
Seattle, WA 98104  
VIA EMAIL: VISION2050@PSRC.ORG

Re: Comments on Draft Vision 2050 Regional Plan

Dear Chair Mello,

Thank you for the opportunity to provide comments on the first draft of Vision 2050. This letter and the attached detailed comments represent the collective perspective of the ports of Bremerton, Everett, Seattle, and Tacoma along with The Northwest Seaport Alliance. Our programs touch the lives of Puget Sound residents in numerous ways, ranging from economic engines as the state’s largest cargo terminals to quality of life through our travel and recreation facilities.

Our mission is to create family wage jobs by advancing trade and commerce, promoting manufacturing and maritime growth, and stimulating economic development. The Growth Management Act recognized the importance of our facilities by designating them as essential public facilities, both the maritime ports and Sea-Tac International Airport. Our ports are assets of statewide significance, serving as national and international gateways for trade, industry, travelers, and tourism. These facilities have developed over decades, with unique interactions among existing land uses and critical transportation infrastructure.

These gateways cannot be relocated nor replicated elsewhere and provide a crucial function in the resiliency of our state’s economy. As an indication of what an asset our cargo gateways are consider that nearly 40% of all jobs in Washington State are directly dependent on trade\(^1\). To protect and recognize our collective significant investments, we request that Vision 2050 include a new “Coordination with Ports” element in the Regional Collaboration chapter. Coordinating land use and transportation planning with ports is crucial for the success of our region.

We urge policymakers to recognize that industrial lands play a critical role in addressing housing affordability by providing family wage jobs. Jobs in our industries provide career paths at a range of education levels and their pay is superior to that of typical service sector jobs. A 2017 analysis by local firm Community Attributes Inc. found that, in the Seattle-Bellevue-Tacoma statistical area, 81% of

\(^1\) Washington Council on International Trade, 2018
industrial jobs have an educational requirement of less than a bachelor’s degree. The same study found that 38% of the industrial jobs pay more than $50,000 annually\(^2\).

The preferred growth strategy recognizes the region’s significant investments in non-single occupancy transportation modes, such as high capacity transit. We share the concern about congestion on our highways and support alternative modes of travel. However, high capacity transit station locations, in some instances, are located in, or adjacent to, our Manufacturing Industrial Centers (MICs). Please make sure our industrial lands are protected from incompatible land uses that are traditionally consistent with transit-oriented development (TOD), such as high-density housing. Industrial land encroachment is a threat to the economic engines of our region.

Another aspect of ports and industrial centers that has been routinely underappreciated is the importance of freight mobility. Close in industrial centers are critical to minimizing unnecessary transportation movements and the costs and impacts thereof. We appreciate PSRC’s initiative earlier this year to develop the Freight Briefing Paper. As the paper explains, there are several notable trends afoot in the freight system that warrant further study if we are to properly plan the freight system. Nationally, truck traffic is expected to grow by 44% between 2015 and 2045\(^3\), e-commerce is projected to grow from 11.1% of retail sales in 2019 to 15.1% in 2022 and may eventually reach 25% or more. Internet-impacted sales are forecast to total more than $2.4 trillion and account for more than 58% of total retail sales by 2022\(^4\). How are we as region going to prepare for these dramatic increases? We as a region must prepare to for these increases in freight volume to maintain mobility and ensure sustainability.

Finally, we would like to take this opportunity to point to the extensive efforts that will be required, region-wide, to address climate change. A coalition of seven Pacific Northwest ports was able to show a reduction in greenhouse gasses over an 11-year period ending in 2016 – even as port cargo volumes were increasing. Moving forward, each agency will have different role to play. For this reason, we request that Vision 2050 echo the targets that already have broad-based support. The most appropriate of these targets are those adopted by the King County Cities Climate Collaborative in 2014 and the Paris Climate Accord of 2016.

We invite you to review the attached detailed comments and look forward to working with you, the GMPB and additional stakeholders on Vision 2050.

Sincerely,

[Signature]

Commissioner Peter Steinbrueck
Port of Seattle Commissioner and Northwest Seaport Alliance Managing Member
GMPB Ports Representative

\(^2\) P. 38 “City of Seattle Industrial Lands Land Use and Employment Study” Community Attributes, Inc. November 14, 2017

\(^3\) [https://faf.ornl.gov/fafweb/](https://faf.ornl.gov/fafweb/)

Detailed Comments: Draft Vision 2050 Regional Plan

The ports of Bremerton, Everett, Seattle and Tacoma, along with the Northwest Seaport Alliance, are pleased to join together to submit these detailed comments on scoping for the draft Vision 2050 Plan. Undertaking major infrastructure investments – and understanding how that infrastructure attracts and anchors commerce – is at the heart of our work as port authorities. Our approach to infrastructure is aligned with the Growth Management Act’s goal for efficient utilization of urban infrastructure. We share the following comments:

Introduction

A Vision for 2050 (Page 1)

Economy

Please insert “maritime” after “industry” and replace “maintained” with “enhanced.”

Toward a Sustainable Future

Page 2: In the third sentence, please replace “transit” with “transportation” as this sentence is contemplating transportation in a very broad sense.

Planning for 2050 (Page 3)

Please add “which supplements the roads, rail, and maritime transportation system” at the end of the fourth sentence.

Sustain a strong economy (Page 5)

Please edit the last sentence to read:

“Regional manufacturing/industrial centers, working waterfronts, and airports provide important global connections and living-wage jobs for residents.”

Keep the region moving (Page 6)

Please add “Freight and goods will move more efficiently around the region to homes, businesses, and terminals” after the third sentence of the second paragraph. We would recommend mentioning WSDOT’s Puget Sound Gateway Program, and the NWSA’s efforts to make both harbors big-ship ready, so that the Pacific Northwest maintains direct access to global markets. Further freight-focused system improvements will be necessary in the future.

Grow in centers and near transit (Page 7)

Please add the following sentence at the end of the first paragraph:

“Transit-oriented within or near development near stations in manufacturing/industrial centers will function differently from development in other centers to maintain the region’s focus in protecting and developing our industrial lands, jobs, and the region’s overall economic vitality.”
Act collaboratively and support local efforts (Page 7)
Please edit the first sentence of the second paragraph to read:

“Coordinated planning between cities, counties, ports and other special purpose districts, agencies, tribes, and military installations is a fundamental part of Vision 2050.”

See a related comment below under the heading of “Distributing Growth Using Regional Geographies (Page 27).” It discusses problems and remedies associated with adding major military installations and tribes as regional geographies.

Regional Collaboration (page 15)
Similar to the edits to the collaboration section on page 7, please edit the first sentence of the second paragraph to include ports.

“Coordination with Ports” (New Section on Page 17)
Ports are a vital part of the region, home to tens of thousands of jobs, and major contributors to the region’s economy. They vary in size and character, and include marine ports, airports, industrial uses, and recreational and natural lands. They act as employment and job development centers and create tens of thousands of off-terminal jobs—in Snohomish County, the home of the Port of Everett, 60% of all jobs are trade-dependent. Whether it is planning for development near ports, or considering transportation projects and programs to serve them, it is crucial to involve port officials in regional and local planning efforts.

The following provides comments and edits to the Regional Collaboration Policies:

- Under MPP-RC-1, please add ports to the list of entities coordinating planning efforts.
- After MPP-RC-6, add a new policy for ports:
  “MPP-RC-X—Consult with ports in regional and local planning, recognizing the mutual benefits and potential for impacts between growth occurring within and outside port boundaries.”
- Rewrite MPP-RC-7 as follows: “Direct sub-regional funding, especially county-level and local funds, to countywide centers, local centers, and local high-capacity transit areas with a station area plan. County and local jurisdictions may also decide it is appropriate for county-level and local funding to be prioritized to regional centers.”

Access to High Capacity Transit (Page 26)
After the fourth sentence please add “Transit-oriented development near stations located in or near manufacturing/industrial centers needs to function differently, with different uses than development in other centers to maintain our focus on protecting our industrial lands, jobs, and the region’s overall economic vitality.”

Distributing Growth Using Regional Geographies (Page 27)
The ports are very concerned about the diminished meaning of “regional geographies” reflected here. Vision 2050 should be improving the clarity on coordination between agencies / entities. Instead that clarity is going to suffer based on this scheme’s inclusion of major military installations and tribes – but not ports – as regional geographies. Note that the Ports of Everett, Seattle and Tacoma and The Northwest Seaport Alliance all meet the definition of Transportation Facilities of Statewide Significance.
(RCW 47.06.140), which in turn, makes them essential public facilities that are to be afforded special treatment per the Growth Management Act (RCW 36.70A.200).

We note that Vision 2040 had a much clearer usage of regional geographies in that it was part of the system for allocating growth targets. In that scheme every regional geography received an allocation (natural resource lands were a regional geography that received an allocation of no growth, but zero growth is still an allocation to a geography that is subject to GMA.) Military installations and tribes do not receive growth allocations under GMA – they are exempt from GMA altogether.

The above is not meant to detract from the value of coordination with military installations and tribes. We recommend a much clearer treatment of these issues, which is to label tribes and major military installations as “exempt but impacting geographies.”

**MPP-RGS-7**

At the end of the policy please add “keeping in mind that housing is incompatible with industrial areas.”

**Climate Change Chapter**

**Technology (Page 63)**

At the end of the first paragraph please add: “To reduce emissions from drayage activities, the NWSA Clean Truck Program now ensures that all 4,000 trucks entering international marine terminals have a 2007 or newer engine or a certified equivalent emission control system.”

At the end of the sixth sentence, please add: “and the potential for development of electric aviation technology.”

At the end of the first paraph, please add the sentence: “Meanwhile, on the aviation side, Washington state remains a national leader in laying the groundwork to implement sustainable aviation fuels at Seattle-Tacoma International Airport. The Port of Seattle has set aggressive goals on sustainable aviation fuels implementation, and is working with the state legislature and an array of partners to make that goal a reality.”

**Development Patterns Chapter**

**Figure 24 (Page 76)**

This figure helps clarify some aspects of the role of centers in the regional plan. Presently, though, its design misses an opportunity to clarify perennial issue for MIC’s -- that they are not appropriate locations for housing or for transit-oriented development (with housing being included in most definitions of transit-oriented development). Please make this distinction clear.

**Industrial Lands (Page 81):**

Change “harmful” impacts reference in the third sentence to “challenging” impacts

Add “commercial” in front of “general aviation” in final sentence of the paragraph, reference to protecting against encroachment of incompatible uses at airports.
MPP-DP-50
At the end of the first sentence please add “for highways, arterials, and other major streets.”

DP-Action 2
Please add “protect and enhance” after “preserve.”

Housing Chapter
MPP-H-6
At the end of the policy please add “High concentrations of jobs are located in manufacturing/industrial centers, careful consideration for protection of industrial land must be given when considering housing in proximity to a MIC.”

MPP-H-10
Please add “in housing format” after “flexibility.”

Economy Chapter
MPP-EC-5
Restore “protect” after “Recognize” at the beginning of the EC-5 policy, reflecting PSRC’s goal of protecting essential public facilities against encroachment of incompatible uses, as called for the Growth Management Act. Simply “recognizing” the airports as critical economic assets does not accomplish the same planning outcome of requiring cities, counties, and MPOs to plan for their efficient functioning and protect against incompatible uses.

Transportation Chapter (Pages 111 to 124)
Vision 2050’s goals for quality of life, a healthy economy, and social equity are dependent not only on the movement of people, but also a well-functioning and efficient multimodal freight system. We, as ports, could not fulfill our role as economic development agencies, growing both jobs and the economy as a whole, without a well-functioning, efficient freight transportation system that includes and connects all modes. Yet, the introduction to the Transportation chapter of the multi-county policies is entirely focused on transit and the movement of people, without a single mention of the role freight plays in achieving these goals. There is no mention of the fact that 40% of jobs in Washington (and 60% in Snohomish County) —many supported by our ports — are freight-dependent. Nor is there any recognition of the fact that e-commerce has an increasingly negative impact on congestion in the region. Nationally, truck traffic is expected to grow by 44% between 2015 and 20455, e-commerce is projected to grow from 11.1% of retail sales in 2019 to 15.1% in 2022, and may eventually reach 25% or more.

---
5 FAF 4
Digital-impacted sales are forecast to total more than $2.4 trillion and account for more than 58% of total retail sales by 2022\(^6\). We as a region must prepare to for these increases in freight volume to maintain mobility and ensure sustainability.

As the region’s major planning document, Vision 2050 must ensure that decision makers throughout the region understand the role freight plays in achieving quality of life, social justice and economic growth goals. The region as a whole has a responsibility to ensure that freight can move efficiently, which means that protecting, maintaining and improving major freight corridors crossing jurisdictional boundaries is both a regional and local responsibility.

Please rewrite the introduction, and the “Supporting the Economy” section to provide emphasis on the importance of freight mobility. PSRC’s Freight Briefing Paper can serve as resource for missing information, and our staff would be happy to support this effort.

The following provides detailed comments on transportation policies and actions:

- The policies related to freight mobility (Policies MPP-T-24 through 26), in combination with the broader policies providing for a safe, efficient and reliable transportation system for all users (MPP-T 1, 8, 14, 23 and 34) would enable the ports, and the businesses that depend on them, to function well—if they were implemented with the same thoroughness as those for other modes. Unfortunately, projects that would improve freight mobility often do not get the same funding support as non-motorized and transit facility projects. As indicated in our comments on the introduction to the Transportation Chapter, there is a role for PSRC in facilitating greater understanding of the role freight plays to achieve better balance.

- MPP-T-19 is elevating high-capacity transit station areas to the same level as regional growth centers, potentially diluting scarce transportation funds even further. At the same time, the policy is silent on the needs of Manufacturing Industrial Centers. There should be a parallel policy for Manufacturing Industrial Centers.

- Staff appreciates the inclusion of a new action on freight mobility, T-Action-3. However, the action is focused on the “growth and impacts of and goods movement and delivery.” It does not address freight mobility needs in general, or the needs of our ports. It is vague on what the implementation steps would be. PSRC’s current data collection and analysis program for freight is crude compared to other modes. The action should explicitly include a more robust freight data collection program, and a major update to PSRC’s truck model, and ensure that all types of freight are covered. We recommend using the typology of WSDOT’s 2017 Freight System plan, as listed in the Freight Briefing Paper.

- Given the current work underway at the Port of Seattle to accommodate current aviation demand through our Sustainable Airport Master Plan, and associated investments, we would ask that the language in T-Action 5 be amended to reflect the Port’s leadership in addressing current capacity. Currently, it reads “PSRC will work in cooperation with the state, which will play a lead role in addressing aviation capacity needs.” We would like to see the final document say the following: “PSRC will work in cooperation with the state, which will play a lead role in addressing future aviation capacity needs.”

We hope that PSRC will carry out the new actions contained in the policy section of the draft to ensure that the region works together to maintain and improve the freight transportation system.
September 12, 2019

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

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

Dear Mr. Inghram,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Jobs/Housing Balance

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

---

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

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

School Siting

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

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

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

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

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

Coordinated Transportation Planning

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Nate Nehring, Co-Chair  
SCT Steering Committee

Liam Olsen, Co-Chair  
SCT Steering Committee

Dave Somers, Vice-Chair  
SCT Steering Committee

Barbara Tolbert, Vice Chair  
SCT Steering Committee

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

Table 1. Rural Development Capacity – Snohomish County

| Total Number of Existing Vacant Lots | 6,662 |
| Preliminary Lots in Vested Formal Plat Applications | 1,490 |
| Total Existing + Preliminary Vacant Lots | 8,152 |
| Resulting Population (based on total number of vacant lots) | 22,826 |
| Transit Focused Growth Alternative | 10,000 (2%) |
| Reset Urban Growth Alternative | 43,000 (10%) |
| Requested Rural Growth Share | 25,000 (6%) |
| **Draft Preferred Alternative** | **25,000 (6%)** |

Source: July 3, 2019 memo from Paul Inghram to GMPB, Packet Pg. 19. Data provided by Snohomish County PDS.

Notes: Existing vacant lot count only includes the number of lots greater than 20,000 square feet in size; Resulting population is based on 2.8 multiplier applied to total existing and preliminary vacant lots.

Table 2. Urban Unincorporated Population – Snohomish County

| Population growth based on existing, “pipeline” developments | 9,000 |
| 2014 Buildable Lands capacity (population) | 27,000 |
| Transit Focused Growth alternative | 12,000 (3%) |
| Reset Urban Growth alternative | 69,000 (16%) |
| SCT-requested UUGA growth share | 18,000 (4%) |
| **Draft Preferred Alternative** | **18,000 (4%)** |

Source: July 3, 2019 memo from Paul Inghram to GMPB, Packet Pg. 16. Data provided by Snohomish County PDS.
Dear Chair Mello:

Thank you for the opportunity for the Sound Cities Association (SCA) to comment on the draft update to the region’s long-range plan for growth, VISION 2050.

SCA was founded to help cities in King County act locally and partner regionally to create vital, livable communities through advocacy, education, leadership, mutual support, and networking. Collectively, our 38 member cities represent over one million constituents in King County.

On September 18, 2019 the SCA Board of Directors unanimously adopted the following policy position in response to the draft plan and its successful implementation over the next 30 years:

1. **Maximize the benefits of the region’s significant investments in high-capacity transit by setting ambitious regional goals for attracting housing and jobs in proximity to this transit.**

The Transit Focused Growth alternative analyzed in the DSEIS performed comparably better regionally in modeling potential environmental impacts of 1) air quality and community health; 2) the degree of forecasted climate change; 3) increases in transit use and thus access to jobs; and 4) an increased supply of the moderate-density housing most associated with increasing access to affordability.

The draft Regional Growth Strategy includes an ambitious goal to “attract 65% of the region’s residential and 75% of the region’s employment growth to high-capacity transit station areas.” PSRC has previously affirmed this numerical goal as an aspirational regional statement and not as a standard applied to individual jurisdictions and their station areas and this should be clearly stated in the plan. Implementation of a transit focused strategy should not be one-size-fits-all and significant analysis will be required to determine what can be realistically achieved within individual jurisdictions while promoting improved quality of life.

2. **Incorporate policies and regional actions that mitigate displacement risk, ensure equitable outcomes and access to opportunity, and support affordable housing preservation and development most suitable for each city and town across the four-county region.**

September 24, 2019

Councilmember Ryan Mello  
Chair, Growth Management Policy Board  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  

Dear Chair Mello:

Thank you for the opportunity for the Sound Cities Association (SCA) to comment on the draft update to the region’s long-range plan for growth, VISION 2050.

SCA was founded to help cities in King County act locally and partner regionally to create vital, livable communities through advocacy, education, leadership, mutual support, and networking. Collectively, our 38 member cities represent over one million constituents in King County.

On September 18, 2019 the SCA Board of Directors unanimously adopted the following policy position in response to the draft plan and its successful implementation over the next 30 years:

1. **Maximize the benefits of the region’s significant investments in high-capacity transit by setting ambitious regional goals for attracting housing and jobs in proximity to this transit.**

The Transit Focused Growth alternative analyzed in the DSEIS performed comparably better regionally in modeling potential environmental impacts of 1) air quality and community health; 2) the degree of forecasted climate change; 3) increases in transit use and thus access to jobs; and 4) an increased supply of the moderate-density housing most associated with increasing access to affordability.

The draft Regional Growth Strategy includes an ambitious goal to “attract 65% of the region’s residential and 75% of the region’s employment growth to high-capacity transit station areas.” PSRC has previously affirmed this numerical goal as an aspirational regional statement and not as a standard applied to individual jurisdictions and their station areas and this should be clearly stated in the plan. Implementation of a transit focused strategy should not be one-size-fits-all and significant analysis will be required to determine what can be realistically achieved within individual jurisdictions while promoting improved quality of life.

2. **Incorporate policies and regional actions that mitigate displacement risk, ensure equitable outcomes and access to opportunity, and support affordable housing preservation and development most suitable for each city and town across the four-county region.**

September 24, 2019

Councilmember Ryan Mello  
Chair, Growth Management Policy Board  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  

Dear Chair Mello:

Thank you for the opportunity for the Sound Cities Association (SCA) to comment on the draft update to the region’s long-range plan for growth, VISION 2050.

SCA was founded to help cities in King County act locally and partner regionally to create vital, livable communities through advocacy, education, leadership, mutual support, and networking. Collectively, our 38 member cities represent over one million constituents in King County.

On September 18, 2019 the SCA Board of Directors unanimously adopted the following policy position in response to the draft plan and its successful implementation over the next 30 years:

1. **Maximize the benefits of the region’s significant investments in high-capacity transit by setting ambitious regional goals for attracting housing and jobs in proximity to this transit.**

The Transit Focused Growth alternative analyzed in the DSEIS performed comparably better regionally in modeling potential environmental impacts of 1) air quality and community health; 2) the degree of forecasted climate change; 3) increases in transit use and thus access to jobs; and 4) an increased supply of the moderate-density housing most associated with increasing access to affordability.

The draft Regional Growth Strategy includes an ambitious goal to “attract 65% of the region’s residential and 75% of the region’s employment growth to high-capacity transit station areas.” PSRC has previously affirmed this numerical goal as an aspirational regional statement and not as a standard applied to individual jurisdictions and their station areas and this should be clearly stated in the plan. Implementation of a transit focused strategy should not be one-size-fits-all and significant analysis will be required to determine what can be realistically achieved within individual jurisdictions while promoting improved quality of life.

2. **Incorporate policies and regional actions that mitigate displacement risk, ensure equitable outcomes and access to opportunity, and support affordable housing preservation and development most suitable for each city and town across the four-county region.**

September 24, 2019

Councilmember Ryan Mello  
Chair, Growth Management Policy Board  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  

Dear Chair Mello:

Thank you for the opportunity for the Sound Cities Association (SCA) to comment on the draft update to the region’s long-range plan for growth, VISION 2050.

SCA was founded to help cities in King County act locally and partner regionally to create vital, livable communities through advocacy, education, leadership, mutual support, and networking. Collectively, our 38 member cities represent over one million constituents in King County.

On September 18, 2019 the SCA Board of Directors unanimously adopted the following policy position in response to the draft plan and its successful implementation over the next 30 years:

1. **Maximize the benefits of the region’s significant investments in high-capacity transit by setting ambitious regional goals for attracting housing and jobs in proximity to this transit.**

The Transit Focused Growth alternative analyzed in the DSEIS performed comparably better regionally in modeling potential environmental impacts of 1) air quality and community health; 2) the degree of forecasted climate change; 3) increases in transit use and thus access to jobs; and 4) an increased supply of the moderate-density housing most associated with increasing access to affordability.

The draft Regional Growth Strategy includes an ambitious goal to “attract 65% of the region’s residential and 75% of the region’s employment growth to high-capacity transit station areas.” PSRC has previously affirmed this numerical goal as an aspirational regional statement and not as a standard applied to individual jurisdictions and their station areas and this should be clearly stated in the plan. Implementation of a transit focused strategy should not be one-size-fits-all and significant analysis will be required to determine what can be realistically achieved within individual jurisdictions while promoting improved quality of life.

2. **Incorporate policies and regional actions that mitigate displacement risk, ensure equitable outcomes and access to opportunity, and support affordable housing preservation and development most suitable for each city and town across the four-county region.**

September 24, 2019

Councilmember Ryan Mello  
Chair, Growth Management Policy Board  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  

Dear Chair Mello:

Thank you for the opportunity for the Sound Cities Association (SCA) to comment on the draft update to the region’s long-range plan for growth, VISION 2050.

SCA was founded to help cities in King County act locally and partner regionally to create vital, livable communities through advocacy, education, leadership, mutual support, and networking. Collectively, our 38 member cities represent over one million constituents in King County.

On September 18, 2019 the SCA Board of Directors unanimously adopted the following policy position in response to the draft plan and its successful implementation over the next 30 years:

1. **Maximize the benefits of the region’s significant investments in high-capacity transit by setting ambitious regional goals for attracting housing and jobs in proximity to this transit.**

The Transit Focused Growth alternative analyzed in the DSEIS performed comparably better regionally in modeling potential environmental impacts of 1) air quality and community health; 2) the degree of forecasted climate change; 3) increases in transit use and thus access to jobs; and 4) an increased supply of the moderate-density housing most associated with increasing access to affordability.

The draft Regional Growth Strategy includes an ambitious goal to “attract 65% of the region’s residential and 75% of the region’s employment growth to high-capacity transit station areas.” PSRC has previously affirmed this numerical goal as an aspirational regional statement and not as a standard applied to individual jurisdictions and their station areas and this should be clearly stated in the plan. Implementation of a transit focused strategy should not be one-size-fits-all and significant analysis will be required to determine what can be realistically achieved within individual jurisdictions while promoting improved quality of life.

2. **Incorporate policies and regional actions that mitigate displacement risk, ensure equitable outcomes and access to opportunity, and support affordable housing preservation and development most suitable for each city and town across the four-county region.**
Because focusing growth near transit emphasizes redevelopment, it also carries a relatively greater risk of displacing existing affordably-priced housing and vulnerable populations. SCA supports the development of effective displacement mitigation tools and strategies for centering equity in regional planning. This work should be supported by the development of a regional housing needs assessment and through direct PSRC technical assistance to develop effective affordable housing goals, strategies, and programs. Providing tools to address affordability is preferable to “top-down” mandates as cities and towns address the region’s affordable housing crisis within the constraints of their own local housing markets.

3. Conduct further work by PSRC and member jurisdictions to mutually clarify expectations related to local plan growth targets.

It is critical to include counties, cities, and towns in a process to transparently set targets, and in developing the guidance that PSRC will provide. Local targets must: 1) be based on real-world circumstances; 2) reflect the ability of jurisdictions to provide necessary services and infrastructure; and 4) recognize that market forces often act independent of local policy.

Meeting the goal of encouraging efficient use of urban land requires that the Regional Growth Strategy not be used to set caps on growth when it can be demonstrated that existing or planned infrastructure—including access to transit—is available to accommodate that growth.

4. Provide technical assistance and advocate for resources for cities and towns to implement VISION 2050.

Developing local comprehensive plans is complex and demands significant resources. It is critical that the four-county region advocate for state resources for local planning, necessary infrastructure investments, and provide technical assistance for cities and towns, especially smaller jurisdictions, to effectively implement VISION 2050.

Thank you again for the opportunity to provide feedback on the draft VISION 2050 plan. If you have any questions, please contact SCA Policy Director Brian Parry at brian@soundcities.org.

Sincerely,

Mayor Leanne Guier, Pacific President, Sound Cities Association (SCA)

cc: SCA Board of Directors
SCA Public Issues Committee
King County Executive Dow Constantine
King County Council
Deputy Mayor Jay Arnold, Kirkland, SCA GMPB Caucus Chair
Mayor Debbie Bertlin, Mercer Island, SCA GMPC Caucus Chair
37th LD Environment and Climate Caucus
09/10/2019

37th LD Environment and Climate Caucus's Resolution in Support of Strengthening Puget Sound Regional Council's Vision 2050 Draft Goals

An October 2018 Intergovernmental Panel on Climate Change (IPCC) report states that we have only until 2030 to drastically reduce devastating greenhouse gas emissions and avoid a climate catastrophe.

We applaud PSRC efforts in seeking to address this urgent issue, but the current version of Vision 2050 does not adequately tackle the climate crisis.

Therefore, we strongly recommend the PSRC make the following changes in its revised version.

PSRC should:

Formally adopt specific targets of reducing emissions to a minimum of 50% by 2030 and 80% by 2050 compared to 1990 levels, which is in line with the Puget Sound Clean Air Agency’s goals. We also recognize that the IPCC found that emissions need to decline by 45% from 2010 levels by 2030, and reach net zero by 2050. That should also be taken into consideration.

Ensure decisions on proposed projects are made through a climate lens, considering whether they would help achieve those climate targets.

Provide tools and policies that local governments can employ to promote climate justice, with a particular focus on communities that are likely to be displaced or require adaptation efforts.

Conduct regular progress evaluations on at least an annual basis and course correct when necessary. These progress reports should be available to the public.
September 16, 2019

Puget Sound Regional Council
1011 Western Avenue
Seattle WA 98104

Re: Vision 2050 comments

Dear PSRC,

Thank you for giving us the opportunity to comment on Vision 2050. 350 Seattle works toward climate justice by organizing people to make deep system change: resisting fossil fuels, building momentum for healthy alternatives, and fostering resilient, just, and welcoming communities.

The climate crisis is a new type of problem for planners. As a profession, planners have become adept at synthesizing diverse perspectives—developers and environmentalists, suburban and urban communities, conservatives and liberals—to create shared visions of future development. The climate crisis, however, cannot be managed through this planning-as-mediation approach. We cannot negotiate or compromise with the laws of physics and chemistry that drive the climate crisis. Instead, planners need to adopt clear mandates on climate pollution reduction taken from the best available climate science.

Vision 2050 does not do this. The result is a document stating that by 2050 climate pollution will be “substantially reduced,” when climate science tells us it must be entirely eliminated by that date. Science also tells us that our energy sources must be 100% renewable by 2050. Yet Vision 2050 only talks vaguely about “expanding the use… of alternative energy.”

The daily news confirms that the climate crisis is becoming ever more dire, while we continue to fall behind in reining in the climate pollution that drives it. Many of today’s youth pay attention to climate science. PSRC’s current approach tells them that we are not planning to leave them a livable world. We must do better.

The final draft of Vision 2050 should show how long-range planning can be an organizing force in the fight to contain the climate crisis. It should be built around the goal of reducing climate
pollution by 45% by 2030 and eliminating it by 2050, as called for by the International Panel on Climate Change (IPCC). It should clearly state that we must use 100% renewable energy by 2050. The following comments are our attempt to highlight how Vision 2050 must be amended toward a climate-safe future.

1) Vision 2050 must establish science-based climate pollution reduction targets

Vision 2050 has no real target. Instead it calls for carbon pollution to be “substantially reduced” by 2050 (see page 1 and MPP-CC-1). This is inadequate. Vision 2050 must adopt the targets called for by the IPCC: reduce climate pollution by 45% in 2030, and 100% in 2050.¹

Vision 2050 states that “PSRC supports the efforts of partner agencies and member jurisdictions,” and then describes climate reduction targets adopted by local jurisdictions (page 60-61) that are well below what science tells us is needed. Instead Vision 2050 must ask all jurisdictions to set their targets in line with the science-based targets set by the IPCC, and work harder to meet them.

2) What we measure must give a more complete picture of carbon pollution

Figure 20, on page 59 of Vision 2050, shows the breakdown of carbon pollution emissions within the geographic boundaries of the four county area. This method does not include all emissions created by the consumer activities of the residents living within the geographic boundary. King County has created a consumption based inventory, and it reveals that the climate pollution caused by our consumer behavior is more than twice as large as the carbon pollution emitted within our boundaries.²

Following the lead of King County, PSRC should include both types of inventory in Vision 2050. By showing both methods, PSRC will give a more complete and honest picture of the climate pollution we cause. For example, Figure 20 shows “air travel” as emitting a mere 2% of climate pollution, because what is being measured is the climate pollution emitted at take-offs and landings (essentially the geographically bounded emissions). Whereas actual emissions from all fuel pumped at King County airports is ten times that amount, and are a major source of our region’s emissions that must be fully considered and addressed.

Clearly consumer behavior underlies a large amount of climate pollution, and there is a moral responsibility to account for consumer emissions when presenting an inventory of our climate pollution. Admittedly, local governments cannot regulate climate pollution emitted outside their boundaries for the production of imported goods. Nor should we rely on admonishing consumers to change behavior. There are still, however, important actions that local

governments can take. For example, garbage removal services pricing, and every-other-week garbage collection, can be used together to discourage excessive consumerism and the associated packaging. Local jurisdictions can adopt laws eliminating single use plastic bottles and containers, as the San Francisco Airport recently did, or requiring the reuse of materials when buildings are demolished, as Portland did a couple years ago.

3) Vision 2050 must create a clearer picture of how we can develop compact communities

Vision 2050 states that "[g]rowth in compact, urban communities, especially near transit stations can lead to a range of substantial… benefits, including the potential to… cut energy consumption and greenhouse gas emissions" (page 69). However, our region has been developed at low densities. Creating compact urban communities in our region will take an honest discussion of what is needed, as well as a sustained and coordinated effort.

The five “Metropolitan Cities” will, according to Vision 2050, absorb 650,000 new residents by 2050. Significant portions of these cities are now zoned for single family residences, and these areas are not at transit-supporting densities. Vision 2050 should state that zoning these areas for higher densities will both accommodate allocated population growth and promote transit-supportive densities (as mentioned on page 74).

Vision 2050 includes many good policies to help create climate friendly compact communities, but they are scattered throughout the document. They should be presented together as a coordinated process—for example a one page inset—to show how this transformation can take place. Below is a possible outline.

Creating compact centers

a) Identify underused lands that could develop as a compact urban center. See DP-Action-7, page 89, and MPP-DP 4, page 83. (These policies should also identify the redevelopment of parking areas, many of which are underused, see here and here).

b) Include community members, landowners in planning. See MPP-DP-7, p. 89.

c) Emphasize the popularity of walkable neighborhoods. See text on p. 69 that cites the “growing demand for walkable communities.”

d) Improve connectivity by adding streets, and include active transportation options. See MPP-DP-3, p. 89; Goal of Development Patterns chapter, p. 69; and MPP-T-17 p. 119.

e) Zone for higher densities, affordable housing, and mixed use. See MPP-DP-1, p. 82, and use public private partnerships, See MPP-H-11, p. 97.

f) Daylight streams and create new gathering places and small urban parks. See MPP-DP-10, p. 83.

g) Coordinate with Transit agencies to center transit in the new urban center. See DP-Action-3, p. 88.

By bringing these policies together, Vision 2050 can create a much clearer picture of the process involved in creating these “compact, walkable, transit served” locations that are repeatedly mentioned in the document.

4) Vision 2050 must plan for high capacity transit (HCT) to become the preferred mode of transportation

Vision 2050 does not do enough to plan for HCT to become the preferred mode of transportation. It states that by 2050 only 2 million people in the region will be connected by high capacity transit (p. 6), which leaves 3 million people living in car dependent areas. MPP-CC-3, p. 65, acknowledges that reducing vehicle miles travelled (VMTs) is a key factor in reaching climate pollution reduction goals. Yet Vision 2050 only reduces VMTs about 20%, from 16.1 miles (per person per day) to 12.8 miles by 2050. King County found that over the same time frame, a 50% reduction in VMTs is needed to achieve climate pollution reduction goals. Vision 2050 must plan for the greater reduction of VMTs required to meet IPCC targets, and a correspondingly greater expansion of HCT. To attain this goal, Vision 2050 should show how Bus Rapid Transit (BRT) can play a much bigger role.

Figure 31 of Vision 2050 shows the planned build-out of the rapid transit systems in our region. Here we can see that BRT will serve substantially greater area than light rail. In addition, BRT can be expanded to even more areas at a significantly lower cost than light rail. BRT will need to be competitive with driving as a preferred way of getting around. To gain ridership from car drivers, BRT needs to be reliable, frequent, and fast. Therefore buses in a BRT system can’t be stuck in traffic, they need bus only lanes and bus priority signalling. Vision 2050 should therefore include the following two new policies:

- Require all towns and cities with bus transit centers to plan for bus-only lanes in and out of those transit centers.

_____________________

5 See DSEIS, Appendix B: Supplemental Data Tables and Figures, page B-25.
6 See GHG Emissions in King County: 2017 Inventory Update, Contribution Analysis, and Wedge Analysis, page 42.
- Provide bus-only lanes at all identified traffic choke points on planned BRT routes in the region, and provide a mechanism for quickly adding bus lanes whenever growth in traffic creates new choke points.

5) Vision 2050 must plan for a substantial reduction in emissions associated with aviation.

MPP-T-28 policy includes “accommodating” anticipated growth in aviation. This is incompatible with stated climate goals and must be re-assessed. Aviation is one of the largest, and growing, sources of emissions in our region. PSRC should be committed to developing lower-emission alternatives to aviation and reducing aviation-related emissions by, primarily, reducing use and dependence of aviation for transportation and freight. Moreover, the Four-Part GHG strategy (CC-Action-1) is inadequate because it fails to take into consideration emissions from air transportation. Reductions in other sectors will be eclipsed by increased air transportation emissions, and any meaningful strategy must include significant reductions in air transportation emissions. The GHG strategy should be amended to include reductions in air transportation emissions, and PSRC should work with other regulatory bodies to achieve such reductions through, primarily, lowered use and reliance on air transportation. Finally, reduction in air transportation emissions should be included in Vision 2050 and re-evaluated every four years as part of the update of the Regional Transportation Plan, and T-Action-5 should be amended to include research and analysis of actual emissions from aviation and a commitment to seeking alternatives to and limiting growth of aviation.

6) Vision 2050 must show how we will use 100% renewable energy sources

Vision 2050 calls for “expanding the use of alternative energy.” This is insufficient. The Clean Energy Transformation Act requires the state's electric sector to be 100% carbon free by 2045. Vision 2050 should build on that foundation by articulating our region’s pathway to 100% renewables within that time frame. In particular Vision 2050 should articulate the need to eliminate fracked gas as an energy source.

Given the short-term impacts of methane leakage, as well as the indoor health risks of gas use, our region must plan to transition off of fracked gas well before 2050. While specific amounts are debated, methane leakage is known to be significant at all stages of production, from well-head to burning. Berkeley, California has banned the use of methane in new residential construction. and other cities in California are expected to follow their lead. In Seattle, a ban on gas in all new construction has been proposed. Planners in our region should include gas retrofit strategies in their work going forward. An available policy tool is the federal Social Cost of Carbon. It has been included in the Clean Energy Transformation Act, for use when

---

7 See GHG Emissions in King County: 2017 Inventory Update, Contribution Analysis, and Wedge Analysis, page 10 (when considering all emissions from aviation, it becomes the single largest source of transportation emissions).
assessing power generation, and the Clean Buildings bill, for use when considering the implementation of gas in new buildings.

7) Vision 2050 must emphasize that sequestering carbon is an essential component of managing our climate crisis

The IPCC has made it clear that sequestering carbon is not optional, but rather an essential strategy in managing the climate crisis. Yet Vision 2050 includes only one policy, MPP-CC-4, p. 65, on this subject. Vision 2050 should include the following policies:

- Local jurisdictions should lead the way on carbon sequestration, by requiring Parks departments to adopt horticultural practices that maximize carbon sequestration.
- Private property owners should be given incentives for transforming lawns and impermeable surfaces to the growing of trees.
- Local jurisdictions should provide incentives to local farmers to maximize carbon sequestration in their farming practices.
- Coastal management agencies should explore how to use “blue carbon” sequestration techniques along our coasts.
- Woodlands and other extant carbon sequestration resources should be conserved in their entirety.

8) Vision 2050’s section on Adaptation must include more specific guidance and address big questions.

As noted on page 64, climate change will bring more extreme heat events, more precipitation, sea level rise, and ocean acidification. Vision 2050 can include more specific guidance on how we can adapt to these changes.

For example, higher temperatures will be exacerbated throughout the region by the “heat island effect” caused by certain development patterns. A recent study has shown that the heat island effect is also a social justice issue, with the location of heat islands correlating with lower income communities. These researchers have also categorized strategies to reduce the heat island effect. Vision 2050 should include two policies regarding this problem:

- Local jurisdictions should study and map the location of the heat island effect within their boundaries.
- Local jurisdictions should work with communities where the heat island effect is greatest to reduce the effect through a variety of strategies known to be effective, including: removing or whitewashing black asphalt or roof surfaces, adding more trees for shade,

---

9 https://e360.yale.edu/features/can-we-turn-down-the-temperature-on-urban-heat-islands
requiring developers to vary the heights of new buildings to increase airflow, and opening more public air-conditioned spaces.

Other adaptation topics are given insufficient attention. Huge questions are left unanswered. For example:

- What kind of economic development is appropriate in the face of climate change?
- What do resilient communities look like, and how can we promote them?

In the coming 30 years, the climate crisis is likely to continue to bring disasters (heatwaves, droughts, wildfires, flooding, and refugees) in escalating intensity, even if we radically reduce emissions tomorrow. This is the physics and chemistry of climate change. It will require everyone to change our behavior fundamentally, and it would be best if we are prepared. Planners must lead the way, and to do this they must change too. The old planning-as-mediation model is an inadequate response to the laws of physics and chemistry that drive climate change. Vision 2050 must articulate a bold vision of how our communities can be reorganized to both contain and adapt to the climate crisis.

Thank you for your attention.

Sincerely,

Andrew Kidde, Sarah Shifely, David Perk, Alice Lockhart,
350 Seattle

http://theconversation.com/if-we-stopped-emitting-greenhouse-gases-right-now-would-we-stop-climate-change-78882
Andrew Kidde, climate activist with 350 Seattle, provided verbal comments at the September 5 Growth Management Policy Board Public Hearing. Mr. Kidde stated the need to reduce Vehicle Miles Travelled (VMT) to achieve climate pollution reduction goals. He recognized that VISION 2050 notes the significance in reducing VMT to achieve climate goals and stated the VMT reduction associated with the Transit Focused Growth scenario. Mr. Kidde believes the VMT reduction is not enough and shared suggestions for further reduction of VMT. Mr. Kidde stated VISION 2050 should encourage cities with bus transit centers to dedicate bus lanes in and out of transit centers. He noted that bus lanes should be provided through all regional traffic choke points. Mr. Kidde requested more specific details on how to create compact, walkable places and suggested incorporating policies that address redevelopment of gray field properties, private-public partnerships, improvements in local connectivity, and coordination with transit agencies. Mr. Kidde requested a more robust definition of “walkability” in VISION 2050.
Re: Comments to Transportation Section of the PSRC Vision 2050 Plan for the Central Puget Sound Region

Dear Puget Sound Regional Council:

The ACES Northwest Network was formed in 2017 to facilitate collaboration among business members and with state and local governments and transportation agencies to ensure the Puget Sound region is a leader in implementing ACES (Autonomous Connected Electric and Shared) mobility technologies. This includes connected vehicles (V2V, V2I, IoT), electric vehicles, shared vehicles, autonomous vehicles, small cell/5G and a wide variety of other technologies.

Our co-chairs are Tom Alberg from Madrona Venture Group and Bryan Mistele from INRIX. They serve on the Washington State Autonomous Vehicle Work Group Executive Committee. Our members envision a transportation system that is efficient, equitable, accessible, and environmentally positive. This system can reduce regional traffic congestion and accidents dramatically, improve commercial shipping and e-commerce supply chains, expand transit and ride share partnerships, conserve energy and reduce carbon. In order to achieve this vision the Network is committed to four strategic goals to shape the future of mobility:

- **Accelerate** and integrate technology into our transportation system
- **Increase** mobility for lower-income and underserved communities
- **Remove** barriers to transportation innovation at federal, state, and local levels
- **Promote** our region as a “Center of Excellence” for ACES adoption

Attached is the letter we sent in January 2018 commenting on the Regional Transportation Plan. We reiterate those recommendations, particularly the need for a PSRC Technology Advisory Committee to ensure state and local leaders keep abreast of technology developments in transportation, align with the Governor’s Executive Order on Autonomous Vehicles (17-02) and the work of the legislatively created State Autonomous Vehicle Work Group.

Our ACES NW Network would be pleased to participate in the work of a Technology Advisory Committee. We could share results of several ACES community forums in Seattle, Kent, Des Moines, and Renton (with participation from WSDOT, Metro and Sound Transit) as well as our on-going partnership with the Bellevue Chamber, Eastside Legislative Chamber Coalition and the Cities of Bellevue and Kirkland in support of their innovative CommutePool project. In fact, the adopted **Bellevue Smart Mobility Plan** serves as an excellent blueprint for all PSRC jurisdictions.
The Draft 2050 Vision needs an enhanced and more comprehensive section on advanced transportation technologies. As our co-chairs have commented, a combination of new technologies will fundamentally change transportation well before 2050.¹

The deceasing price of vehicle batteries, consistent doubling of computing power and rapid improvements in sensors combined with deep machine learning made possible by advanced cloud capability have converged to make autonomous, connected, electric and shared vehicles safe, affordable and ubiquitous. “We are on the cusp of one of the fastest, deepest, most consequential disruptions of transportation in history.” ii

PSRC’s draft transportation section on Transportation Technology and Changing Mobility states:

“PSRC will continue to conduct research and analysis on the potential impacts from emerging technologies and changes in mobility patterns, including ongoing improvements in PSRC modeling and analytical tools. PSRC will build relationships among a diverse set of stakeholders and facilitation discussions to assist member organizations to become prepared for these changes in transportation mobility and to address consequences and from local decision making. Outcomes could include guidance, best practices and future policies.” (Draft p. 122)

This falls short of other excellent sections of the 2050 Vision and even research and analysis that PSRC has already done. PSRC should also explore technology-based, futuristic visions.

Consider the words of General Motors CEO, Mary Barra, “GM’s vision is a world with zero crashes, zero emissions and zero congestion.” GM believes the future of mobility will be driven by the convergence of electrification, autonomous vehicles, connectivity and shared mobility services.”iii This should be our goal, too.

Zero crashes

Deaths and injuries on our state highways and roads are increasing. Seattle, for example, is on track to have its worst year for crashes since 2010. iv As the National Safety Council has noted, automated vehicle technologies have the potential to reduce the nearly 40,000 annual U.S. traffic deaths by 80% or more. v

In a 2016 op-ed on federal policies to encourage autonomous vehicles, President Obama said:

“Automated vehicles have the potential to save tens of thousands of lives each year. And right now, for too many senior citizens and Americans with disabilities, driving isn’t an option. Automated vehicles could change their lives. Safer, more accessible driving. Less congested, less polluted roads.” vi

As referenced above, Washington State is taking a leadership role on autonomous vehicles. In June 2017, Governor Inslee signed an executive order on autonomous vehicles. The order
recognized the benefits of autonomous vehicle technologies and established a framework for testing and deploying autonomous vehicles:

- The safe testing and operation of autonomous vehicles may produce transformational societal benefits: reducing injuries and saving lives lost to vehicle collisions, reclaiming time spent in traffic, maximizing our ability to move people and goods quickly and safely throughout the state, improving mobility for the elderly and disabled, reducing property damage and serving as an important tool in our efforts to combat climate change;
- The future of transportation, commerce and economic development of communities large and small relies on innovative technologies that could improve passenger, bicycle and pedestrian safety, bolster mobility options and foster greater economic productivity and security for all.

Last year the Governor also signed legislation that created an autonomous vehicle work group that now includes both private and public-sector members to be organized and led by the Washington State Transportation Commission. ACES partners participate in a variety of subcommittees.

**Zero Emissions**

Washington State has set goals for the reduction of carbon emissions. Most of our carbon emissions are the result of burning fossil fuels in transportation. Since we have the cleanest and least expensive electric power grid in the nation, the most effective and economical way to reduce emissions in transportation is to move from oil and use state generated electricity instead. Washington would save billions of dollars that would otherwise go out of the state’s economy.

Without a faster transition from oil to electricity in transportation, the state will not be able to meet GHG emission reduction goals set by state statute. Our ACES community initiatives incorporate major and minor electric charging hubs along corridors for public and private vehicles.

Regional leadership has been strong. Examples: Mayor Durkan and the City’s Drive Clean Seattle smart city, race/social justice, EV/EV charging strategies, NW Seaport’s clean air, clean trucks and clean maritime fuel initiatives, and Washington State Ferries switch to hybrid electric.

We recommend a PSRC intergovernmental subcommittee with WSDOT, Puget Sound Clean Air Agency, FORTH and Western Washington Clean Cities to work with Puget Sound Energy, Seattle City Light, Tacoma Power, Snohomish PUD, and charging companies to expand EV charging options. This would include DC fast charging options for vanpools and ride-share services, municipal fleets, Pierce Transit and Metro electric buses and electric freight deliveries. Also…

1. **Electrification, Parking and Codes:**

   - Work with owners and operators of parking in public and private structures where people will be parked for extended times to provide for charging infrastructure, such as libraries, convention centers, shopping areas, museums, movie theaters, restaurants, hotels and parks;
Follow up on the model set of regional building code requirements PSRC pioneered to create a fast and easy uniform permit process for installing charging outlets at home or in commercial spaces;

Develop programs that encourage private companies and property owners to add charging infrastructure to existing facilities.

2. Accelerate an all-electric Sound Transit, Metro, Pierce Transit and Community Transit bus fleet in the region:

Metro has an order for over 120 all-electric buses and Pierce Transit recently announced it is also buying Proterra electric buses. The region should be the first in the U.S. to have all-electric buses on all routes in the region, to save money, reduce emissions and encourage economic development. Electric buses are less expensive on a life cycle cost basis than CNG, LNG, or diesel-electric hybrids. Cost savings will continue to increase with the economies of scale and supply chain improvements:

- Convene a regional committee to work with Seattle City Light, Tacoma Power, Snohomish PUD, and PSE to reform regulated rates for bus charging to eliminate costly demand surcharges;
- The regional committee should explore ways to encourage use of buses with a longer range that do not need to be charged during the day and can be recharged at off-peak times to better utilize the grid;
- Encourage advanced autonomous features in the new electric buses to reduce collisions. Pierce County, for example, is leading a national study on Automatic Emergency Braking to reduce injuries, fatalities and costs;
- Track, report and publicize cost savings and emission reductions;
- Research a program to repurpose batteries into stationary back up emergency sources;
- Advocate for an on-demand smaller electric transit service to serve paratransit customers, especially for trips to local hospitals and medical clinics;
- Explore ways to use private sector EV services to supplement peak demand

3. Encourage a transition from oil to electricity for all regional city and county vehicle fleets:

- Provide information and best practices on Electric Vehicles, including information on the state buying program to enable regional cities to purchase EV vehicles. Larger cities and counties must comply with state law on transition from oil to electric and biofuels, but all jurisdictions could save money as well as reducing emissions;
- Track and publish data on maintenance savings, emission reductions and fuel savings in regular reports. Track by cost per mile compared to gasoline vehicles;
-5-

- Research a program to re-purpose EV batteries into back-up sources of power for emergency uses;
- Partner with companies making trucks and other larger electric vehicles, for introduction into regional municipal fleets.

**Zero Congestion**

Established in 1991, the state Commute Trip Reduction Act has a goal to reduce traffic on roads, especially at peak commute times. However, there has been a “22% increase in urban delays due to congestion,” according to the Washington State Department of Transportation Gray Notebook report issued at the end of 2017. PSRC itself reports that “delay on the region’s freeway corridors has increased more than 50% since 2014, and the average travel time to work continues to steadily increase” (draft page 111).

PSRC should help accelerate public private partnerships with rideshare companies and social service agencies (Via, Hopelink, Lyft and Uber) for First/Last Mile connections to transit centers pioneered by Metro and Pierce Transit. WSDOT and Pierce Transit are also collaborating on an EV AV shuttle to transit centers. ACES is supporting other EV AV shuttle initiatives in Bellevue, Sea Tac, Kirkland and Renton.

Washington State has the largest commuter vanpool programs in the country. An enhanced vanpool program (such as City of Bellevue and Kirkland’s CommutePool) with flexible, electric and ultimately autonomous vehicles (with urban curb space access and suburban pick up and drop off areas) will enable more people to use fewer vehicles at peak times, reduce emissions, and provide better job accessibility for low-income workers who can’t afford close-in housing.

Eastside corridors such as I-405/I-90 and SR167/522/518/18 are ideal test beds with business models incorporating high capacity transit access and point to point employer shuttles developed by Microsoft, Amazon, T-Mobile and other employers. Shared mobility with pooled rides is the key to leveraging vehicle electrification and automation to reduce congestion and emissions and create livable urban communities.

If electric vehicles are used for pooled service, the energy and climate benefits are multiplied. If pooled EVs are automated, the benefits are further enhance and the cost per vehicle mile drops dramatically. We should coordinate employers with WSDOT, Pierce Transit, Community Transit, Metro, Sound Transit and the Washington State Transportation Commission’s autonomous vehicle work group to accelerate examination of first mile/last mile routes and partnerships for autonomous electric shuttles including routes to and from transit centers to offices and retail areas.

Thank you for your consideration.

Bruce Agnew

Director, Cascadia Center and ACES NW Network

| Discovery Institute | 208 Columbia Street. | Seattle Washington 98104 |
B. Mistele and T. Alberg, *Let technology take the wheel for safer, less-congested roads*, February 2, 2018
https://www.seattletimes.com/opinion/let-technology-take-the-wheel-for-safer-less-congested-roads/


General Motors Press release, *Mary Barra Outlines GM’s Road Map for Safer, Better and More Sustainable Transportation Solution*, September 15, 2017


In 2017, there were nearly 40,000 deaths in the United States from auto-related accidents, the deadliest for automotive-related deaths since 2008 and the largest year-over-year percentage increase in 50 years, according to the National Safety Council. “Google estimates that automation could eliminate at least half of the 1.2 million crash fatalities each year around the globe.”

B. Obama, *Self-driving, yes, but also safe: New technologies and regulations will be explored at a White House conference in Pittsburgh*, September 19, 2016

For an overview from Proterra see: https://www.youtube.com/watch?v=NIDRYAWn7ds. For a King County Metro video see: https://www.youtube.com/watch?time_continue=22&v=b1YW1LV6S_w

D. Roberts, *Electric buses are coming, and they’re going to help fix 4 big urban problems Urban transit is the EV sweet spot*, April 28, 2018

The Washington State Department of Enterprise Services (www.des.wa.gov) has developed EV contracts with car and truck makers (EV Contract 05916 for cars and Contract 09214 for electric buses). Philip Saunders leads the DES program, which has a goal to make all state light duty vehicles electric.
Philip.Saunders@des.wa.gov.

J. Ayre, *Volvo Trucks to Launch First Commercial Electric Truck, Production Beginning in 2019*, April 16, 2018

Also...
- RCW 43.19.648 requires state agencies and local governments to fuel publicly owned vehicles, vessels, and construction equipment with electricity or biofuels to the extent practicable. The definition of practicable can be found in Chapter 194-28 WAC for state agencies and Chapter 194-29 WAC for local governments. The rules for local governments took effect June 1, 2018.
January 30, 2018

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

Re: Comments to Draft / The Regional Transportation Plan - 2018
Recommending Enhancements to Transportation Technology ("2018 Update")

Dear Puget Sound Regional Council:

ACES Northwest Network is a coalition formed in 2017 for the purpose of promoting the planning and use of new transportation technologies in the Puget Sound region. This includes connected vehicles (V2V, V2I, IoT), electric vehicles, shared vehicles, autonomous vehicles and a wide variety of other technologies. A list of Network participants is included in Attachment A. One of our primary goals is to unite the public and private sectors to commonly plan for the implementation of new technologies and work to eliminate regulatory barriers.

The world of transportation technology is advancing quickly, and promises to address the following goals of our region’s residents and businesses:

- Reduce single-occupancy vehicles
- Reduce traffic congestion and travel time
- Increase transit ridership
- Connect low density areas to transit
- Create jobs and economic development
- Reduce surface water runoff
- Reduce carbon emissions
- Reduce vehicle miles traveled
- Improve freight and logistics
- Improve mobility for the elderly
- Improve mobility for the disabled
- Achieve Target Zero
- Improve vehicle safety
- Improve air quality

It is with these goals in mind that we offer the following comments to the 2018 Update.

We approve of the information contained on pages 16-18 of the 2018 Update (Supporting Innovation), pages 31-34 (TDM and Transportation Technology) and Appendix N – Technology; and support the Implementation Actions for Technology found on page 87, which include:

- Establishing a technology advisory committee. ACES NW Network would appreciate the opportunity for some of our members to join the PSRC committee.
- Update the region’s ITS Implementation Plan (RITSIP) to better reflect existing conditions, current needs and projected changes due to new technologies.
• **Continue to enhance regional models to analyze the effect of new technology on the transportation system and travel behavior.** We assume that “regional models” refers to the PSRC’s land use and transportation models. We encourage development of these models to attempt to project the impacts (positive and negative) on land use and transportation, as well as attempt to identify and forecast the benefits and detriments of new technologies.

• **Facilitate regional discussions to identify opportunities to support private sector projects and partnerships and the deployment of pilot programs.** This effort is central to the ACES mission and we look forward to collaborating with the PSRC on this Implementation Action. We call your attention to our existing efforts with the City of Bellevue to enable pilot transportation technology programs to be delivered in the City.

In addition, we make the following requests:

• **Regional Transportation Technology Plan.** Create a regional transportation technology plan that identifies new technology projects for the region to implement and provides a schedule and budget for implementing them. The transportation technology plan should communicate the regional strategy and serve as a tool for obtaining public and private funding for technology projects. Creation of the transportation technology plan should be added to the list of implementation actions on Page 87 of the 2018 Update.

• **Funding.** Identify public and private funding sources for the technology projects. For example, PPP’s such as the Smart Columbus public/private partnership, local sources including Bellevue’s transportation technology fund, state sources like the R&D sales tax credit, and federal grants like the USDOT INFRA and ACTMTD grant programs.

• **Regional Transportation Project List.** Identify and add the technology projects to the list of existing projects within Appendix G of the 2018 Update and to the PSRC’s Transportation Improvement Plan.

• **Target Zero.** Leverage the efforts to achieve Target Zero to identify, fund and implement new technologies that have the potential to improve vehicle safety, reduce fatalities and serious injuries, and at the same time improve mobility and achieve other transportation technology goals. In other words, “Supporting Innovation” should be an integral part of achieving a “Safe Transportation Network”, and vice-versa.

• **Improve Transit Ridership and Reduce Single Occupancy Vehicles.** Maximize the investments in light rail and bus transit, and reduce single occupancy vehicles, by:
  o enabling commuters from lower density areas to connect to transit via new technologies -- for example, using ride sharing, car sharing or flexible electric vanpools to connect from lower density neighborhoods to park & rides/mobility hubs;
  o enabling shared employer shuttles and transportation network companies to utilize park & rides, mobility hubs and rail stations for pick up and drop off;
  o planning for the siting and funding of new park & rides, or “mobility hubs” throughout the region (it is critical that the PSRC take the lead on this effort); and
  o making use of new “mini transit” models such as autonomous shuttles.
The Regional Transit Access and Parking Strategy on pages 40-41 of the 2018 Update is a start, but additional effort from the PSRC is needed to enable the entire region, including lower density areas, better access to the transit system.

- **Improve Freight Mobility.** Include a discussion of new technologies in the Freight Mobility section on pages 57-58 of the 2018 Update. It is likely that freight and logistics companies will be early adopters of new technologies, including those being developed by local companies (and ACES members) PACCAR and NVIDIA which include autonomous and electric trucks. Platooned truck exercises currently done in California and proposed in Oregon should also be explored with WSDOT. The 2018 Update should call for the region to identify ways to support the implementation of these technologies with an eye toward improving freight carrier route selection and delivery times, improving throughput, reducing overall traffic congestion, improving air quality through reduction of diesel emissions and achieving Target Zero.

- **Remove Regulatory Barriers.** We ask that the PSRC and its technology committee focus on avenues to remove legislative and municipal barriers to new technologies. ACES NW Network has identified several legislative areas that need to be improved, and have included them in Attachment B to this letter.

Thank you for the careful consideration of these comments, and we look forward to working with you as this region establishes itself as a leader in this exciting new frontier of transportation.

Sincerely yours,

Tom Alberg  
Madrona Venture Group  
Co-chair, ACES NW Network

Bryan Mistele  
INRIX,  
Co-chair, ACES NW Network

**Attachments**
Attachment A – ACES Northwest Network Participant List  
Attachment B – ACES Northwest Network 2018 Legislative Agenda
Attachment A – ACES NW Network  Participants 2017

Amazon
Apex Foundation
Chargegpoint
City of Bellevue
Craig Mundie and Associates
Cyanogen
Cascadia Center, Discovery Institute
Drive Forward Seattle
Dylan Bay
Eastside For Hire
Echodyne
Ford Chariot
HERE
IBI Group
Social Venture Partners
INRIX
Insight Strategic Partners
Kemper Development
Lyft
Madrona Venture Group
Mighty AI
NBBJ
NVIDIA
PACCAR
Puget Sound Energy
BMW Reach Now
Seattle Foundation
SHG
T-Mobile
Tesla
Transpo
Uber
Venable
Vulcan
Wallace Properties
Washington Business Alliance
Waymo
Zonar Systems
Attachment B  Legislative Agenda 2018

The ACES Legislative Caucus was held at the INRIX headquarters in Kirkland on Friday, October 20, 2017. Tentative agenda items (in partnership with Bellevue/Eastside Chambers):

- Flexible, app-dispatched, electric van pools for the I-405, SR 167/9/522 corridors deployed through employer partnerships, state support and super fast charging centers
- Coordination with the Governor’s Office and NW congressional delegation on federal and state jurisdiction regarding autonomous vehicles regulations
- Restrictions lifted on shared employer shuttles imposed by RCW 35.58.245
- Multi-modal public and private transportation electrification incentives
- Potential transit agency and private mobility service partnerships to address first mile/last mile challenges and conversion of park and ride lots to mobility hubs
- Low income mobility access from low density neighborhoods to high density employment
- Statewide TNC business regulatory harmonization
- Enhancing Commute Trip Reduction Act for van pools and car pools
- Providing cost-effective electric vehicle incentives for people and goods
- Creating tax incentives for used electric vehicle purchases for low income workers
- Adjusting the cap on EV sales tax credit
- Modifying regulations for curbside or off-street electric vehicle charging stations
- Update statewide building and electrical codes to incentivize the expansion of electric vehicle charging station capability in multi-family, commercial, and single family housing developments

Attendees: Rep. JT Wilcox
Sen. Steve Hobbs
Rep. Larry Springer
Sen. Guy Palumbo
Rep. Melanie Stambaugh
Rep. Ed Orcutt
Rep. Vandana Slatter
Rep. Gael Tarleton
Rep. Mark Harmsworth
Confirmed but unable to participate – Senator Doug Ericksen and Rep. Dick Muri
September 13, 2019

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

Re: Vision 2050

Dear Sir or Madam:

I am writing on behalf of the Alderwood Water & Wastewater District (AWWD) to provide comments on the Vision 2050 Plan. We appreciate the opportunity to review the document and provide input.

AWWD is one of many water and sewer utilities providing service to homes and businesses throughout the four-county region. Though our facilities are often hidden underground, water and wastewater services are essential to the health and wellbeing of our citizens. As this region continues to grow rapidly—as projected in Vision 2050—it is vital that these utilities be considered in development decisions. For that reason, we appreciate being at the table in Growth Management Policy Board meetings, and that our contributions have been welcomed.

We have seen the comment letter submitted (September 6, 2019) by the Washington Association of Sewer and Water Districts (WASWD) and support the comments they made. In particular, we would reinforce the comments about protection of the region’s major water supplies. Officials and agencies with great foresight more than a century ago identified significant water supplies and went to great efforts to protect those resources for future use. They are invaluable to today’s communities and to the growth coming our way. All long-range planning in the region should work to prevent damage to these resources.

We also want to thank the Policy Board for its revisions to policy MPP-PS-7. The new language acknowledges the importance of collaboration and improving service to the public versus focusing on a goal of having cities be the service providers. The issue of making sure that utilities are involved in planning efforts is critical. Water and sewer utilities typically do not try to promote or oppose growth plans, but when we are involved and have input there is a better chance that we can be ready to serve growth when it happens, and to do so cost-effectively.

Thank you again for the chance to comment on the Vision 2050 Plan.

Sincerely,

Jeff Clarke  
General Manager

Alderwood Water & Wastewater District VISION 2050 Draft
On behalf of the Bellevue Downtown Association (BDA), I’m writing to support the continued capacity of growth centers, such as Downtown Bellevue, to accommodate jobs, housing and infrastructure that will sustain economic opportunity, access, opportunity and livability for our region.

Through careful planning and a strong market response from new development, Downtown Bellevue continues to embrace and exceed expectations for employment and housing growth. Our city’s core is one of the fastest growing regional centers and will remain the primary multi-modal hub of the Eastside’s network. Recognizing future trip growth, the Draft Plan confirms how important key investments and new strategies will be for improving access to housing, regional mobility and access to centers like Downtown Bellevue.

The BDA continues to support current commitments vital to Downtown Bellevue’s growth as a sustainable regional center. Specifically related to mobility (and reflected in our comments on the Regional Transportation Plan, planning should advance the following projects and initiatives:

- I-405 Master Plan Congestion Relief and Bus Rapid Transit projects
- SR-520 capacity and interchange improvements
- Regional funding and project commitments in Sound Transit 2 and Sound Transit 3
- City of Bellevue’s Transportation Facilities Program, Capital Investment Improvement Plan, Downtown Transportation Plan Update, Bellevue’s Transit Master Plan, Pedestrian and Bike Implementation Initiative
- Emerging smart technology for mobility projects and programs
- Transportation Demand Management investments and programs for regional centers and corridors
- Improved collaboration and integration at all levels for transportation planning and project delivery
- New, innovative partnerships among agencies and jurisdictions, including the private sector

Thank you for your leadership and the opportunity to comment on the Draft Plan. We appreciate the diligent work of PSRC committees and PSRC staff who’ve moved the update forward.
September 16, 2019

VIA EMAIL DELIVERY
(jbrown@psrc.org)
(VISION2050@psrc.org)

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

Re: Comments to Draft Vision 2050

Dear Mr. Brown:

Thank you for the opportunity, on behalf of Bethel School District and the Pierce County School Districts Coalition, to provide comments to the Draft of Vision 2050.

The School Districts Coalition note, in the Introduction and Overview and the Multi-County Planning Policies Sections of Vision 2050, that there is an acknowledgement and recognition by the Puget Sound Regional Council that Multi-County Planning Policies (MPPs) are intended as “overall guidance and direction for planning processes and decision-making at regional and local levels”. The MPPs, therefore, do not supplant the language of the Growth Management Act.

The Growth Management Act recognized that public schools, being a constitutionally mandated provision, were not defined or classified as either an “urban” or a “rural” services in order to ensure flexibility to allow the unique circumstances and land use patterns of a local area and local school programmatic and community needs determined by a local school board, after careful and thoughtful consideration, to determine appropriate and suitable locations for educational facilities. One size does not fit all. Therefore, it cannot be stated categorically as commented under Vision 2050 that “developing urban-serving schools” in rural areas “often requires expensive programs to transport students and encourages students to drive or be driven to schools”.

Although the overarching goal is to work collaboratively and cooperatively, the State Legislature adopted HB 1017 and HB 2243, with the understanding that local circumstances and land use patterns must be considered to ensure that educational facilities can be constructed to provide adequate public education. The School Districts Coalition supports the MPPs’ (MPP PS-26 and
MPP PS-27) express recognition of RCW 36A.70.211 (codification of HB 1017) providing for urban serving schools in Pierce County to be located in the rural area.

The State’s obligation to provide adequate public education is “preeminent, supreme, and more.” McCleary v. State, 173 Wn.2d 477, 520, 269 P.3d 227 (2012). This constitutional provision is carried out through legislation, including the Growth Management Act and such implementing regulations and policies, which must facilitate, rather than frustrate, the siting of public schools. Thank you for your consideration.

Sincerely,

BETHEL SCHOOL DISTRICT

Thomas G. Seigel
Superintendent
September 12, 2019

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

Re: Climate Solutions comments and recommendations pertaining to Puget Sound Regional Council’s Draft Vision 2050.

Dear Chair Mello, Vice Chair Margeson, and members of the Growth Management Policy Board:

Climate Solutions appreciates the opportunity to provide comments on the Draft of Vision 2050. As our region continues to grow, we have the opportunity and the obligation to ensure that this growth is sustainable and equitable. Climate Solutions is a clean energy nonprofit organization working to accelerate clean energy solutions to the climate crisis. The Northwest has emerged as a center of climate action, and Climate Solutions is at the center of the movement as a catalyst, advocate, and campaign hub. For 20 years, we have cultivated political leadership in the Northwest under the proposition that clean energy and broadly shared economic prosperity go hand-in-hand, building a powerful constituency for local, regional, and state action on climate and clean energy.

The transportation sector is responsible for the largest share of Washington State’s greenhouse gas emissions and other toxic pollutants, making this sector a critical part of addressing climate change and air quality in Washington, and ensuring the Puget Sound Region is a healthy, sustainable region in which to live. In the Puget Sound region specifically, transportation emissions account for over 38% of total greenhouse gas emissions.¹

Vision 2050 is a basis for the critical planning that ensures that as our region grows, we will also reduce our emissions commensurate with what the latest climate science tells us we need to do. Vision 2050 purports to “provide a guide for sustaining a healthy environment, thriving communities, and a strong economy.” However, if Vision 2050, Puget Sound Regional Council (“PSRC”), and member jurisdictions do not take action to address the climate crisis, we will have none of those things. Therefore, we offer the following comments on the draft version of Vision 2050 in the hopes that the final plan will more comprehensively address climate and equity impacts and how they interact, set specific climate targets, make decisions based on those targets, and provide member jurisdictions with tools to take local action.

Context
The Growth Management Planning Board, when evaluating the draft Environmental Impact Statement for Vision 2050, elected to move forward with a modified Transit Oriented Growth alternative. The stronger, unmodified


ClimateSolutions.org
alternative, which planned for 75% of growth near transit (the modified alternative plans for 65%), still resulted in greenhouse gas emissions projections of 39,000 tons of CO\textsubscript{2}e per day, or 12.7 million metric tons annually, for on-road transportation alone, assuming technology remains the same. The Washington Department of Ecology recommended adjusting the current state limits to an 80% reduction below 1990 emissions by 2050 as determined by the most recent science in 2016, a level consistent with California and Oregon, the Puget Sound Clean Air Agency (“PSCAA”), and many other peer jurisdictions globally.\textsuperscript{2}

The State’s Deep Decarbonization Pathways Study analyzed various pathways for achieving 80% reductions below 1990 levels and found that energy system emissions (which include the transportation sector) for the whole state must be below 9.9 million metric tons of CO\textsubscript{2}e per year in order to achieve economy-wide reductions of that level.\textsuperscript{3} In both the modified Transit Oriented Growth alternative, as well as the stronger unmodified version, emissions from on-road transportation in the Puget Sound alone will surpass state limits, assuming current technology. Given this wide gap between what is needed and the preferred alternative for Vision 2050, even if we see a high rate of electrification of transportation, we are still unlikely to see the emissions reductions necessary if PRSC moves forward with the current version of the modified Transit Oriented Growth alternative.

Furthermore, the most recent report from the Intergovernmental Panel on Climate Change (“IPCC”) states that we need to achieve net zero greenhouse gas emissions by 2050 to limit heating to 1.5 degrees Celsius and avoid the most catastrophic impacts of heating, such as drastic sea level rise, more extreme weather events, heat-related mortality events, and more.\textsuperscript{4} It is clear that PSRC has a responsibility to take further steps to reduce regional emissions.

**Recommendations**

We are pleased that Vision 2050, for the first time, includes a chapter on climate change. We are also excited that PSRC staff are working on a climate wedge analysis to better evaluate our region’s emissions and different policy impacts. However, in order for Vision 2050 and PSRC to effectively mitigate climate change, the goals, actions, and policies contained therein need to be strengthened.

**1. Set specific emissions reductions targets.**

The climate change goal in the draft of Vision 2050 is “The region substantially reduces emissions of greenhouse gases that contribute to climate change and prepares for climate change impacts.” The document goes on to mention state, regional, and local goals, which differ from each other and only some of which align with the latest recommendations from the IPCC. For example, on page 60, the draft discusses Washington State’s statutory limits for greenhouse gas reductions. However, context is missing. The Department of Ecology has

\textsuperscript{4} The Guardian, “We must reduce greenhouse gas emissions to net zero or face more floods.” 7 October 2018. https://www.theguardian.com/environment/2018/oct/08/we-must-reduce-greenhouse-gas-emissions-to-net-zero-or-face-more-floods
asserted that these limits, if they are to align with the latest climate science, should be updated.\(^5\) These recommendations should be listed and, furthermore, adopted by PSRC.

The current goal language of “substantially reduce” is undefined. We do need to substantially reduce emissions, but without defined targets, PSRC will be unable to measure if it is achieving the action that is truly necessary. The current plan, therefore, does not align with the intent of the goal. This goal needs to be rewritten to set specific emissions reductions targets, which at a minimum should align with the PSCAA and the most recently recommended state goals.

In addition to listing the state statutory limits, the draft lists PSCAA’s greenhouse gas emissions goals and examples of local goals. However, there is no discussion of whether jurisdictions are on track to meet these goals. For example, King County’s targets are listed and they include a 25% reduction in emissions from a 2007 baseline by 2020. However, according to the just-released inventory, by 2017 emissions had only decreased an estimated 1.2%.\(^6\) Targets alone will not have the needed impact, and it is important for Vision 2050 to acknowledge this.

2. **Approve plans and allocate funding to projects that support the emissions reductions targets.**

In order to achieve this updated goal, Vision 2050 must include new actions regarding decision-making, monitoring and evaluation, and equity. PSRC should leverage its decision-making processes to mitigate the climate crisis. As the agency considers comprehensive plans and transportation project funding, whether or not projects and plans align with the greenhouse gas reduction targets should be evaluated. *PSRC should only approve those plans and allocate funding to projects that support the region’s emissions reductions targets.* An additional action stating as much should be added to Vision 2050.

3. **Evaluate the Four-Part Greenhouse Gas Strategy every two years.**

PSRC should monitor progress and make the necessary process iterations to ensure success. We have a limited timeframe to reduce greenhouse gas emissions. Currently, the Four-Part Greenhouse Gas Strategy is evaluated every four years as a part of the Regional Transportation Plan. This is not frequently enough to make meaningful adjustments. Therefore, *Vision 2050 should include an action that states the Four-Part Greenhouse Gas Strategy will undergo an interim evaluation every two years, in addition to the evaluation under the Regional Transportation Plan, and the agency will also evaluate whether transportation and growth trends are aligned with greenhouse gas emissions reduction targets.* CC-Action-1 should be updated accordingly as well.

4. **Create a climate policy implementation guidebook for member jurisdictions.**

PSRC should support its member jurisdictions in implementing climate policies locally. Municipalities and counties are able to impact greenhouse emissions in ways PSRC does not have the authority to do so. However, PSRC has a wealth of data as well as staff policy expertise that it can lend to members. In the draft of Vision 2050,


MPP-CC-3 states that “cities and counties will incorporate emissions reduction policies and activities in their comprehensive planning.” *Vision 2050 can go further by tasking the agency with creating a climate policy implementation guidebook* that will provide member jurisdictions with the tools to effectively do this. MPP-CC-1 can be amended to require creation of this guidebook, which would “advance state, regional, and local actions” as the policy already calls for.

5. **Ensure the Regional Equity Strategy informs the Four-Part Greenhouse Gas Strategy.**

We need to ensure that climate action is taken in an equitable manner. We are excited that PSRC is creating a Regional Equity Strategy. *The Regional Equity Strategy should inform the Four-Part Greenhouse Gas Strategy* to ensure that those who are disproportionately harmed by climate change will be centered in mitigation and adaptation strategies. We suggest that Vision 2050 include an action affirming this.

6. **Better evaluate and address the impacts of air transportation.**

A notable gap in the climate change actions and policies is air transportation. Currently, the impacts of air travel on both the climate and on communities are not well integrated into Vision 2050. T-Action-5 discusses evaluating the region’s aviation system, but does not mention climate impacts. PSRC should develop a plan to better evaluate and address the impacts of air transportation in our region.

7. **Address the importance of building and transportation electrification.**

On page 59, the draft accurately states that in the Puget Sound, “Within the residential and commercial built environment, electricity consumption represents the largest share of emissions.” Earlier this year, Washington State passed the Clean Energy Transformation Act (CETA), which commits the state to a 100% clean electricity grid by 2045. Given this progress, it is important to recognize that emissions from electricity consumption will be decreasing. Meanwhile, the impact of directly using fossil fuels (most notably gas) in buildings is also significant in terms of emissions as well as impacts to health and safety. Vision 2050 should recognize this context, given that it is a forward-looking document.

8. **Incorporate equity and climate justice by providing member jurisdictions model anti-displacement policies.**

As mentioned earlier, we are supportive of PSRC’s decision to create a Regional Equity Strategy. With regard to climate change, centering equity is important because those who are historically the least responsible for the climate crisis often shoulder disproportionate harm from its impacts. Furthermore, in order to truly address the climate crisis, we need to ensure that *all* people have access to clean transportation and are not forced for socioeconomic reasons to move out of the reach of climate-friendly transportation access. It is unacceptable that communities of color and lower-income communities are experiencing dangerous air pollution from roadways as demonstrated by the Washington Environmental Health Disparities Map. Therefore, as we take action to mitigate the climate crisis, we need to do so with equity in mind. If a system is inequitable, it will not be climate- equitable.

---

friendly as people are unable to access clean options. And, if a system is not climate-friendly, it will not be equitable, as shown by the impacts of air pollution from vehicles burning gas and diesel.

In addition to ensuring the Regional Equity Strategy informs the Four-Part Greenhouse Gas Strategy, as mentioned above, we recommend that PSRC use its policy expertise to support jurisdictions in identifying and implementing anti-displacement policies. MPP-H-12 calls for using a “range of strategies to mitigate displacement impacts”; PSRC can help identify this range of strategies in a toolkit and in this way, provide further guidance to its members.

9. Do not allow additional rural and unincorporated growth in areas without high-capacity transit.
Where and how our region grows is a crucial part of mitigating the climate crisis. Development outside of areas that have access to transit pushes more people to drive. Currently, passenger vehicles account for nearly 90% of our regional transportation greenhouse gas emissions, and over 35% of our total emissions. Development in rural areas also degrades our natural spaces, which decreases our resiliency and depletes natural carbon sequestration abilities. Therefore, we oppose additional rural and urban unincorporated growth in areas that lack high-capacity transit, which is neither climate-friendly nor cost-effective given our investment in our regional transportation system.

Conclusion
We strongly suggest that PSRC amend Vision 2050 in accordance with these recommendations. We are facing a climate crisis that requires bold action. As a region, we have both the responsibility and the opportunity to reduce carbon and other air pollution, improve our health and economic vibrancy, and take on a model leadership role for other areas of the country and the world.

Thank you again for the opportunity to provide comments on the Draft Vision 2050. Vision 2050 will help guide the growth of our region and thus it should commit to making the necessary greenhouse gas emissions reductions to keep our region healthy and vibrant, while improving transportation choices and access to opportunity to all in our region. For Vision 2050 to meet its aims, PSRC must do what is within its power to mitigate the climate crisis by setting specific targets, using a climate lens while making decisions, evaluating its progress, and providing member jurisdictions with resources to take local action.

Sincerely,

Leah Missik
Washington Transportation Policy Manager
Climate Solutions

Leah Missik, Climate Solutions, provided verbal comments at the September 5 Growth Management Policy Board Public Hearing. Ms. Missik stated concerns that VISION does not properly address climate change or address climate change in an equitable manner. Ms. Missik stated VISION 2050 should establish climate targets, and PSRC should lend its expertise to help local jurisdictions take climate action. Ms. Missik stated her support for the Climate Change chapter and committing to do a climate wedge analysis. She stated that Climate Solutions would like VISION 2050 to go further with taking climate action, by amending policies to commit to specific greenhouse gas pollution reduction goals aligned with the Puget Sound Clean Air Agency, leverage comprehensive plan approval and allocation of transportation funds to enforce emission reductions, commit local jurisdictions to sustainable growth, no new sprawl, and clean transportation. She noted that even though some of these suggestions are out of PSRC’s scope and control, the agency can be a valuable resource. Ms. Missik requested that PSRC create an implementation guide with model climate-related policies that local jurisdictions can adopt and evaluate greenhouse gas emissions every two years instead of every four years. She noted that PSRC’s plan and all decisions should align with climate targets.
The Communities of Concern Commission is a coalition of leaders of communities of color and poor rural communities building self-determined capital assets to reduce poverty.

We agree that local actions will be critical for the region to make progress in addressing the lack of housing options and affordability, but our cultural communities have not had access to local jurisdictional planning processes. How will the PSRC 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? Where are our communities in "Amazing Place"? How will growth in centers and near transit be equitable, i.e. north Seattle vs. south Seattle? Has the PSRC asked tribes how they want to participate in Vision 2050? Were the advocacy groups providing input to Vision 2050 representative of communities of color and poor rural communities? Guidance for Aligning Growth Targets doesn't include equity or diversity. User Fees (P. 63) disproportionately impact low-income/wage people; we agree on further pursuit of alternative transportation financing mechanisms. Page 94: Given that 38% of people are at 0 to 80% compared to 40% of people at above 125%, more public resources, incentives and zoning changes should be allocated to housing people at 80% or lower income. Housing Policies MPP-H-3: How is "equitably and rationally distributed throughout the region" defined? Page 127: What is the balance between unavoidable adverse impacts, NIMBY, and the positive impacts of capital facilities public services? Public Services Policies, MPP-PS-6: add "culturally" appropriate; MPP-PS-27: add "culturally" design. Implementation-Data, Tools and Assistance: What has been the participation of racial/cultural communities in local jurisdiction planning processes? Policy & Plan Review: Does the PSRC use and equity lens?

We appreciate MPP-EN-4; MPP-CC-6; MPP-DP 6, 7, 9, 17 and 22; Page 91 recognition of shortage of housing opportunities by renters of color; MPP-H-12; MPP-EC-7, 12,15,17, and 20.

I have shared the Vision 2050 email with Commission native members who include Muckleshoot, Lummi, urban and unaffiliated tribal members.

Thank you for the opportunity to provide comments from our Commission perspective.
Paul Inghram, Director of Growth
Management Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

SUBJECT: EASC 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. Economic Alliance Snohomish County (EASC) appreciates the extensive amount of work that the PSRC has put into drafting this document and soliciting stakeholder feedback. The PSRC has shown a great deal of collaboration with our organization and Snohomish County cities in the past when submitting feedback and that is very much appreciated.

Economic Alliance Snohomish County (EASC) serves as a combined economic development organization and countywide chamber of commerce for Snohomish County. We bring together private-public partners to create a unified voice for Snohomish County. We are committed to growing and nurturing a vital regional economy that is globally competitive.

EASC finds this document particularly useful for cities in guiding the region with the goal of a cohesive result in terms of growth management and development in their comprehensive planning updates. We also see an opportunity to better involve the business community in this planning going forward. While PSRC’s role in this document is to be the guide post for local jurisdictions, making things measurable where possible and finding ways to get more involvement from the business community would benefit the region’s efforts in meeting the goals laid out in this draft over the next few decades.

We understand that cities will draft their comp plans from this document once it is finalized and that they will then directly work with businesses to see this vision through. Given the extensive goals within this document, much of it depends on the health and vitality of the economy as businesses create jobs, pay the majority of taxes, and locate themselves where it makes sense economically. More stakeholder input on this document before it reaches its final stages is necessary to ensure this plan has buy in from those that will help see it to fruition over the coming decades. Below are some suggestions that we hope you take into consideration as this process moves forward.

The Economy Policies on pages 105-107 lay a good groundwork for what we want our economy to look like in 2050. The Economy Actions are still vague in how all these policies will be achieved.

The paragraph on page 101 states that “VISION 2050 calls for a better balance of job creation among the counties to broaden opportunity and create a better jobs-housing balance.” This is a great goal and we would like to see more concrete ways in which this will be accomplished.
Transportation
Like we commented above in the Economy section, the policies are good guides, but the actions lack specifics on how to reach those policies. Economy is mentioned in the narrative section of this plan and yet not mentioned in terms of any actions to address how we will build a transportation system that will support a thriving economy. EASC appreciates the action on freight mobility so while that tackles one area of the economy, this plan should do more.

Additionally, as light rail continues to expand we are concerned about how communities outside of the I-5 corridor will be affected. Even today we see a disproportionate number of lower income families commuting further away from job centers as they are priced out of much of the I-5 corridor. The transportation actions must not lose sight of the equity in one’s ability to reach the infrastructure to job centers. This is later addressed in comments below and other sections to some point but would like to emphasize the importance of supporting communities outside of the future areas of focused growth.

In a letter to the PSRC dated September 12, 2019 from the City of Monroe suggested changes to MPP-T-22 which we support:

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.”

EASC understands that there will be no double decker I-5 from Pierce to Snohomish at any time in the future but we must acknowledge that while multimodal options will be an emphasis of focus in our mobility in the years to come, people will not always have the means to utilize those options.

Regional Collaboration
The Regional Collaboration Polices in this draft encompass a good approach to collaboration in the region. The one community that seems to be left out of this discussion is the business community however. While the business community is inherently involved in policies throughout this collaboration, the details of what cities choose to do with for example in MPP-RC-9 should be more specific as to designate how these policies work with business to help carry out this vision.

The inclusion of a healthy economy throughout this document is vital for every one of the sub sections of VISION 2050. Any tools that can specifically direct aid/resources/etc. for ensuring industries across our region are flourishing and that plans are developed with them in mind, will help us reach the goals within this document. **RC-Action-4** should specifically call out the business community as a key stakeholder as to ensure their inclusion throughout this process. This process, while not inherently tied to the business community, should make clear to business stakeholders across the region that their input is wanted and in fact needed in order to be truly collaborative.

Additional comments on other sections of this draft
EASC supports the inclusion of the following items in VISION 2050 and suggests additional enhancements as indicated below by Snohomish County Tomorrow (SCT):

**Transit Focused Growth** – EASC supports the selection of the modified transit focused growth alternative and would like to express gratitude to PSRC for considering existing conditions when establishing the modified population allocation for Snohomish County.
Timing of Growth – EASC supports the language included on page 43, which identifies potential difficulties in aligning growth targets for some areas where extension of the high-capacity transit system is not scheduled until the latter portions of the 30-year planning period. To ensure additional consideration of this issue, EASC recommends modifying **RGS-Action-3**, as follows, to call for more analysis of this timing challenge for local jurisdictions:

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

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

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

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

Displacement – There is concern across the region and in Snohomish County about the potential displacement of people of color, low income individuals, and other at-risk populations due to redevelopment and investment in high-capacity transit. EASC supports the focus on displacement in the Regional Equity Strategy in **RC-Action-3**. A tool kit containing best practices will be of particular value in assisting local jurisdictions address potential displacement. With the economic opportunity in the growth our region will see over the coming decades, it is key that we promote policies that allow such growth, while preserving the communities that are thriving today.

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

Transit Focused Growth
As mentioned above, EASC is appreciative that the recommended population allocation for Snohomish County was included in the draft VISION 2050 plan.

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

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

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

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

**Jobs/Housing Balance**

In a letter from SCT dated April 29, 2019, support was expressed for shifting 2% or more of King County’s employment growth to Snohomish County. While this reallocation of future employment growth will help to improve the jobs/housing balance, help to reduce VMT and greenhouse gas emissions, and provide other benefits, EASC wants to ensure that some tangible policy and/or actions are put into place to make this goal achievable. Because employees travel across jurisdictional boundaries regularly for work, it is important that a shift in employment allocation is addressed not only through local actions, but also through regional activities, policies, incentives, and programs.

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

**Coordinated Transportation Planning**

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

**Changing Technology**

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

Infrastructure and Services Funding
Since the inception of GMA, local jurisdictions have seen increased difficulties raising revenue to fund appropriate infrastructure and services. While EASC recognizes that changes to state law would be required to change funding mechanisms and increase the financial sustainability of local government, VISION 2050 should include a strong discussion of these difficulties. In addition, EASC recommends that an action step be added to VISION 2050 which directs 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. EASC appreciates the opportunity to participate in this process. If you have any questions about any of these comments, please do not hesitate to contact me directly.

Sincerely,

Erik Ashlie-Vinke
Senior Manager, Business & Economic Advocacy
Economic Alliance Snohomish County

CC: Josh Brown, Executive Director, PSRC
Re: Community Input on Draft PSRC Vision 2050

Estimado Honorable Puget Sound Regional Council Leadership,

Saludos from El Centro De La Raza. My name is Estela Ortega and I serve as Executive Director of El Centro de la Raza. El Centro de la Raza is a Latino community-based organization whose mission is to build unity across all racial and economic sectors, to organize, empower, and defend our most vulnerable and marginalized populations and to bring justice, dignity, equality, and freedom to all the peoples of the world. Our environmental justice work is anchored in our founding principle to struggle for a clean and safe environment, and work for a rational use of natural resources to preserve Mother Earth and manifest the peaceful development of humankind.

Thank you for the opportunity to comment on Puget Sound Regional Council Vision 2050 that will direct its activities over the next 30 years.

We are at a time when rapid regional growth is driving growth management and transportation policies and strategies that must be sensitive to the environment, climate change and community impacts.

The Puget Sound Regional Council has effectively conducted land transportation planning and compliance. To this end, we ask that PSRC include in its Vision 2050:

1. the establishment of air transportation role and capacity similar to the current land transportation function to allow for integrated, complementary and creative land and aviation transportation planning,

2. the alignment of its Puget Sound regional Vision 2050 environmental goals with the environmental/climate change goals of the counties, cities, towns, ports, tribes and transit and state agencies it serves, and

3. the inclusion of environmental justice analyses in its reviews.

These changes are beneficial to our state, to the Puget Sound region and to our local community. We at Beacon Hill are surrounded by land and air sources of emissions from I-5, I-90, Rainier and Dr. Martin Luther King Way. We are located right underneath the fixed flight path where 70% of the airplanes that land fly overhead. In short, airplanes fly overhead every 90 seconds on the average with noise levels anywhere from 70 to 90 decibels. As an identified SE Seattle vulnerable community, we have 35,000 residents with close to 80% people of color, 44% immigrants and refugees with 36% not speaking English well and one out of 5 residents are poor.
From a beloved community perspective, we need such integrated upstream transportation analysis to produce logical reality-based strategies and solutions for all entities and communities.

We applaud PSRC’s strong history of evolution to meet the challenges of the changing times. We respectfully request that PSRC fully considers and integrates our comments into PSRC’s Vision 2050 document. We stand ready to assist in this process.

Please let me know if you would like a dialogue about our recommendation, please contact Maria Batayola, Environmental Justice Coordinator at mbjumpstart@msn.com or (206) 293-2951 to set up a time.

Respetuosamente,

Estela Ortega, Executive Director

C: US Rep. Adam Smith
   Senator Bob Hasegawa, District 11
   Senator Rebecca Saldana, District 37
   Rep. Sharon Tomiko Santos, District 37, Position 1
   Rep. Eric Pettigrew, District 37, Position 2
   Rep. Zach Hudgins, District 11, Position 1
   Rep. Steve Bergquist, District 11, Position 2

Mayor Jenny Durkan
Jessica Finn-Coven, Office of Sustainability Director
Seattle Council President/District 2 Representation Bruce Harrell
Seattle CM Mike O’Brien, Chair Transportation and Sustainability Committee
Seattle CM Teresa Mosqueda, Chair Housing, Health, Energy and Working Rights Committee
Beacon Hill Council

King County Executive Dow Constantine
Matias Valenzuela, King County Equity and Social Justice Director
King County CM District 2 Representative Larry Gossett
King County CM Dave Upthegrove, Chair Mobility and Environment Committee
King County CM Jeanne Kohl-Welles, Chair Health, Housing and Human Services Committee

Beacon Hill Council Chair Maria Batayola
Beacon Hill Community Noise Measurement Team Coordinator Dr. Roseanne Lorenzana
Puget Sound Sage ED Nicole Keenan Lai
Transportation Coalition Choices Policy Director Hester Serebrin
Maria Batayola, Environmental Justice Coordinator for El Centro de la Raza, provided verbal comments at the September 5 Growth Management Policy Board Public Hearing. Ms. Batayola provided a written letter from Centro de la Raza and stated her organization has concerns about air and land transportation pollution, specifically with regards to the flight paths over Beacon Hill. She stated that PSRC came to mind as an opportunity to address these issues in her community. Ms. Batayola stated transportation and growth policies must be sensitive to the environment, climate change, and community impacts. She concluded by suggesting that air transportation should be integrated into the land-based transportation planning process. She stated that she is worried that the environmental analysis done for land transportation will be remiss if air transportation impacts are not considered.
Emerald Alliance
09/16/2019

Emerald Alliance for People, Nature and Community

To: Puget Sound Regional Council

From: Emerald Alliance for People, Nature and Community Partners

RE: Draft VISION 2050

Date: September 16, 2019

Thank you for the opportunity to comment on the Draft Vision 2050, the draft plan for managing growth across central Puget Sound for the coming decades. The Emerald Alliance strongly supports a final Growth Plan that prioritizes and internalizes the foundational value of the region’s natural infrastructure and systems as core to ensuring the sustainability of its communities, environment and economy. The region cannot afford to lose more ground—literally—as it absorbs the expected growth over the coming three decades. As described in your own Regional Open Space Conservation Plan (ROSCP), failure to prioritize the protection of the 3 million acre regional open space network, especially the 463,000 acres of at-risk open space, renders the prospect of sustainably guiding growth all but impossible. As important, are considerations of the beneficiaries of this sustainable growth.

As PSRC considers comments to this draft plan and moves to approving a final plan, we ask members of the Growth Management Policy Board to:

Evaluate strategies for accommodating growth through a people-forward lens at the intersection of human health, equity and inclusion, access to nature, economic resiliency and environmental quality and justice.

Consider the creation of a Growth Equity Cabinet, following the model set by King County’s Land Conservation Initiative, Equity Cabinet. This regional body can work to ensure that the Multicounty Planning Policies are in line with overarching goals of diversity, equity and inclusion, especially in the allocation of funding to improve access to open space, or nearby nature (that within a 10 minutes walk from home). This body should be well equipped to address the pressing issues of inequality, displacement and encourage strategies for adopting more inclusive community engagement as the growth plan is implemented.

Formally adopt the Regional Open Space Conservation Plan (ROSCP) and align the final V2050 Growth Plan with strict protection of the Regional Open Space Network as defined in the ROSCP, especially high-value biodiversity areas. See the ten strategies for accelerating the protection of open space (see chapter 6: Conservation Action Plan).

Adopt Multicounty Planning Policies (MPP) that scale up and accelerate the conservation of the 463,000 acres of at-risk open space across the region. Once lost,
these acres cannot be recovered or replaced and their loss compromises the region’s 
ability to achieve the goals articulated in the draft plan including lowering emission, 
adapt to the impacts from changes in climate patterns and further exacerbates 
environmental degradation, displacement and income inequality.

Build tangible accountability measures into the Plan’s policies and actions that extend to 
the MPP such that they provide irresistible incentives and effective disincentives for the 
impacts of policies in local jurisdictions that are not in keeping with a truly regional 
vision.

Of particular interest in the growth alternative chosen, we prioritize the alternative that 
maximizes the following priorities:

• Focus growth in existing urban growth areas and away from unincorporated rural 
areas as intended in the state’s Growth Management Act. This protects rural natural 
landscapes from conversion to impervious surface, vital natural resource lands, and 
minimizes the impacts of new growth on receiving tributaries to Puget Sound.

• Furthermore, focus growth in Metropolitan Cities, Core Cities and High-Capacity 
Transit Communities. This maximizes the use of high-capacity transit which lessens the 
overall footprint of growth in terms of:
  o minimizing the addition of impervious surface and polluted runoff into receiving 
surface water;
  o reducing car dependency;
  o lowering vehicle miles traveled per capita;
  o lowering GhG emissions and other pollutants that cause poor air quality;
  o improving the jobs/housing ratio;
  o lowering the need and thus the financial burden of expanding public services in 
rural, less densely populated areas.

• Recognition of the impacts of displacement, which drives people in search of 
affordable housing further away from designated growth centers, undermining 
intentional growth patterns and the conservation and protection of open spaces and 
otherwise rural, natural landscapes. Therefore, we make the above recommendations 
with the caveat that VISION 2050 must:
  o articulate specific policies with actions and dedicated funding that addresses truly 
affordable housing and aggressively mitigates against displacement of residents and 
businesses.
  o invest in the capacity of communities to engage deeply in long range planning to 
ensure that the policies recommended reduce, rather than exacerbate inequities across 
central Puget Sound.
The Emerald Alliance looks forward to continuing work with PSRC as Vision2050 moves forward toward finalizing a growth plan for the future.

Sincerely,

Tracy Stanton

Executive Director
**Brianna Nicolello, Forterra,** provided verbal comments at the September 5 Growth Management Policy Board Public Hearing. Ms. Nicolello described Forterra’s work and intent for providing written comments on the draft plan. She stated concerns that the current growth allocations proposed for rural areas risk creating land use patterns inconsistent with the goals of the Growth Management Act. She stated that rural growth implications include increased traffic congestion, increased infrastructure costs, loss of animal habitat, and environmental degradation. Ms. Nicolello described open spaces as important for economic, social, and environmental integrity. Ms. Nicolello stated PSRC should encourage local jurisdictions to conserve open space and provide equitable access to those preserved spaces. Ms. Nicolello requested for VISION 2050 to require cities and counties to align local comprehensive plans with the Regional Open Space Conservation Plan and measure the impacts of VISION 2050 against that plan.
VISION 2050 Draft Plan

Public Comment

September 16, 2019

EPCA, GMVUAC, GV/LHA, HHA, and UBCUAC
To: Paul Inghram—PSRC, Director of Growth Management: pinghram@psrc.org

Subject: Comments—VISION 2050 Draft Plan

King County’s Rural Area Unincorporated Area Councils (UACs) and Unincorporated Area Associations (UAAs)—Enumclaw Plateau Community Association (EPCA), Greater Maple Valley Unincorporated Area Council (GMVUAC), Green Valley/Lake Holm Association (GV/LHA), Hollywood Hill Association (HHA), and Upper Bear Creek Unincorporated Area Council (UBCUAC) —are pleased to submit the comments herein on the subject VISION 2050 Draft Plan (Plan).

The subject Plan represents an excellent description of what our region needs to achieve and how to do so by 2050. The Policies and Actions are sound and reasonable, as is the Implementation Plan. However, we share a concern PSRC lacks sufficient tools for followthrough.

Our region’s two biggest concerns will continue to be to:

1. Effectively manage growth. Still a major problem and only will become more difficult, especially for those cities on the fringe of the Urban Growth Boundary, where growth is least needed and infrastructure is least able to service such growth.

2. Provide an efficient transportation system. Still a major problem that will become more difficult with insufficient tools available. Concurrency’s many existing flaws only can be fixed at the State level. The “local” focus of Concurrency renders it nigh useless on a “regional” scale, yet major transportation issues only can be addressed using a regional lens. Further, not requiring “Highways of Statewide Significance” to be Concurrency Tested leaves a gaping hole in any traffic analysis to meet Level of Service standards.

Addressing these concerns and achieving Goals of the Plan, will take strong cooperation among all urban and rural stakeholders, as well as the State providing PSRC with more authority.

Please give due consideration to our comments, as they represent concerns of a vast majority of King County’s Rural Area. [Please note, herein we place Plan language in "boxes" (in “quotes/italics” and include pg. nos.) followed by our detailed comments.]

Thank you.

Peter Rimbos primbos@comcast.net) Mike Birdsall mike_birdsall@yahoo.com
Co-Coordinator, VISION 2050, GMVUAC Co-Coordinator, VISION 2050, GMVUAC

Bob Meeks epcawa@gmail.com Steve Hiester info@gmvuac.org
President, EPCA Chair, GMVUAC

Gwyn Vukich GVLHAassn@gmail.com
President, GV/LHA

Michael Tanksley wmtanksley@hollywoodhillassoc.org
President, HHA

Nancy Stafford nm.staff@outlook.com
Chair, UBCUAC

cc: Josh Brown, PSRC Executive Director: jbrown@psrc.org
King County Council: council@kingcounty.gov
John Taylor, Director, King County Dept. of Local Services: john.taylor@kingcounty.gov
Ivan Miller, Comprehensive Planning Manager, King County: ivan.miller@kingcounty.gov
## VISION 2050 Draft Plan

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Introduction and Overview</td>
<td>5</td>
</tr>
<tr>
<td>Toward a Sustainable Future</td>
<td>5</td>
</tr>
<tr>
<td>VISION 2050 Overview</td>
<td>5</td>
</tr>
<tr>
<td>User Guide</td>
<td>6</td>
</tr>
<tr>
<td>Multicounty Planning Policies</td>
<td>7</td>
</tr>
<tr>
<td>A Common Planning Framework</td>
<td>7</td>
</tr>
<tr>
<td>Regional Planning Project Guidance</td>
<td>7</td>
</tr>
<tr>
<td>VISION 2050 Policy Structure</td>
<td>7</td>
</tr>
<tr>
<td>Regional Collaboration</td>
<td>8</td>
</tr>
<tr>
<td>Countywide Coordination</td>
<td>8</td>
</tr>
<tr>
<td>Regional Collaboration Policies (MPP-RC’s)</td>
<td>8</td>
</tr>
<tr>
<td>Regional Growth Strategy</td>
<td>9</td>
</tr>
<tr>
<td>A Framework for Growth</td>
<td>9</td>
</tr>
<tr>
<td>Focusing Growth Near Transit and in Centers</td>
<td>10</td>
</tr>
<tr>
<td>The Regional Growth Strategy by the Numbers</td>
<td>10</td>
</tr>
<tr>
<td>Guidance for Aligning Growth Targets</td>
<td>12</td>
</tr>
<tr>
<td>Regional Growth Strategy Policies (MPP-RGS’s)</td>
<td>13</td>
</tr>
<tr>
<td>Regional Growth Strategy Actions (RGS-Actions)</td>
<td>14</td>
</tr>
<tr>
<td>Environment</td>
<td>15</td>
</tr>
<tr>
<td>Habitat, Open Space, and Environmental Stewardship</td>
<td>15</td>
</tr>
<tr>
<td>Environment Policies (MPP-En’s)</td>
<td>15</td>
</tr>
<tr>
<td>Environment Actions (En-Actions)</td>
<td>16</td>
</tr>
<tr>
<td>Climate Change</td>
<td>18</td>
</tr>
<tr>
<td>State, Regional, and Local Activities</td>
<td>18</td>
</tr>
<tr>
<td>Climate Change Policies (MPP-CC’s)</td>
<td>20</td>
</tr>
<tr>
<td>Climate Change Actions (CC-Actions)</td>
<td>20</td>
</tr>
<tr>
<td>Development Patterns</td>
<td>21</td>
</tr>
<tr>
<td>Centers: Supporting Connections to Opportunities</td>
<td>21</td>
</tr>
<tr>
<td>Annexation and Incorporation</td>
<td>23</td>
</tr>
<tr>
<td>Conserving Traditional Landscapes: Rural Areas and Natural Resource Lands</td>
<td>23</td>
</tr>
<tr>
<td>Supporting Growth Through Concurrency</td>
<td>24</td>
</tr>
<tr>
<td>Development Pattern Policies (MPP-DP’s)</td>
<td>25</td>
</tr>
</tbody>
</table>
VISION 2050 Draft Plan

Development Pattern Actions (DP-Actions) 27
Housing 28
  Jobs-Housing Balance 28
  Housing Actions (H-Actions) 29
Economy 30
  Thriving Communities for People and Businesses 30
  Economy Policies (MPP-EC’s) 31
  Economy Actions (EC-Actions) 31
Transportation 33
  The Regional Transportation Plan 34
  Supporting People 36
  A Sustainable Transportation System 36
  Transportation Policies (MPP-T’s) 37
  Transportation Actions (T-Actions) 38
Public Services 39
  Capital Facility Siting 39
  Public Services Policies (MPP-PS’s) 40
  Public Services Actions (PS-Actions) 41
Implementation 42
  Policy and Plan Review 42
  Regional Transportation Planning and Project Funding 43
  Regional Economic Development Planning 44
VISION 2050 Legal Framework 46
  Growth Management Act 46
VISION 2050 Draft Plan

Introduction and Overview
Draft VISION 2050: Introduction and Overview
(pp. 1-9)

Toward a Sustainable Future
(pp. 2-7)

VISION 2050 Overview

p. 6:

**Keep the region moving**

“VISION 2050 prioritizes transportation investments that support regional growth and manufacturing/industrial centers and emphasizes completing regional transportation projects planned through 2040.”

The prioritization of regional growth and manufacturing/industrial centers makes sense and encourages us that the PSRC will wary about awarding transportation monies to such fringe cities as Black Diamond, which is planning to grossly exceed its agreed-to Growth Targets with little concern or regard for the adverse impacts to surrounding cities and the Rural Area.

p. 7:

**Act collaboratively and support local efforts**

“PSRC will also monitor the implementation of VISION 2050 and use targets, performance measures, plan review, and funding to work towards successful implementation.”

Such monitoring is a key facet to ensuring VISION 2050 is properly implemented at all levels.
p. 8:

**Multicounty Planning Policies**

“The Regional Growth Strategy promotes a focused regional growth pattern. It builds on current growth management plans and recommits the region to directing future development into the urban growth area, while focusing new housing and jobs in cities and within a limited number of designated regional growth centers.”

We strongly support the Regional Growth Strategy that advances “a focused regional growth pattern” and directs “future development into the urban growth area….”
VISION 2050 Draft Plan

Multicounty Planning Policies
Draft VISION 2050: Multicounty Planning Policies
(pp. 11-131)

A Common Planning Framework

p. 11: The Growth Management Act and Multicounty Planning Policies

“... ‘the MPPs provide for coordination and consistency among the metropolitan counties sharing common borders and related regional issues as required by RCW 36.70A.100, and, in order to ensure consistency, the directive policies of the MPPs need to have a binding effect.’ (Summit-Waller Community Association, et al, v Pierce County)”

We do not understand how—and by what mechanism(s)—it is ensured the “Multicounty Planning Policies (MPPs)” have a “binding effect,” beyond general guidance as stated/implied in the two subsections below (with our emphases):

Regional Planning Project Guidance

p. 11: “Multicounty planning policies serve as the framework for growth management, economic development, and transportation projects carried out by PSRC and others. Both the Regional Transportation Plan and Amazing Place, the regional economic strategy, are guided by the multicounty planning policies in VISION 2050.”

VISION 2050 Policy Structure

p. 12: Policies

“The multicounty planning policies provide overall guidance and direction for planning processes and decision-making at regional and local levels. Given the strong integration across the various policy sections in VISION 2050, the full body of multicounty policies is to be considered in decision-making for various programs, projects, and planning processes. The multicounty policies also serve as planning guidelines and principles required by state law to provide a common framework for regional and local planning, particularly in the area of transportation planning and its relationship to land use (RCW 47.80.026).”

Although state law requires such a “common framework for regional and local planning,” much is open to interpretation. Unfortunately, it often is up to members of the Public to ensure jurisdictions properly follow the hierarchy of such policies.
Countywide Coordination

p. 17:

**Funding Priorities and Fiscal Challenges**

“Creating and maintaining sufficient infrastructure to support the Regional Growth Strategy is critically important. This goal is shared by the jurisdictions of the region, who are responsible for transportation project and program implementation. Many of the actions described by multicounty planning policies and actions will require significant financial commitments from all levels of government to provide and maintain services and facilities.”

We consider this a major concern going forward, as we see much growth planned throughout the region, especially in the cities on the “urban fringe,” yet little accompanying realistic transportation planning to meet GMA Concurrency requirements in a timely manner. In addition, it appears many such cities are pinning their hopes on the same, limited bucket of grant monies.

Regional Collaboration Policies (MPP-RC’s)

pp. 18-19:

**MPP-RC-6** — “Give funding priority – both for transportation infrastructure and for economic development – to support designated regional growth centers and manufacturing/industrial centers, consistent with the regional vision. Regional funds are prioritized to regional 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 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. Give additional priority to projects and services that advance affordable housing.”

We consider the three above listed Regional Collaboration Policies (of a total of twelve—all of which are pertinent and needed) as critical to ensuring the integrity of the VISION 2050 Plan and of the Rural Area as the four-county region grows. We support the above policies, which are both strong and necessary, as they: support regional growth and manufacturing/industrial centers; direct funding to countywide and high-capacity transit centers; and provide priority to transportation infrastructure to advance regional growth center housing.
p. 23:  
**Goal:** “The region accommodates growth in urban areas, focused in designated centers and near transit stations, to create healthy, equitable, vibrant communities well-served by infrastructure and services. Rural and resource lands continue to be vital parts of the region that retain important cultural, economic, and rural lifestyle opportunities over the long term.”

We strongly support this goal in implementing the *Regional Growth Strategy*, especially retaining the integrity of rural and resource lands.

p. 23:  
“Under the Growth Management Act, counties, in consultation with cities, are responsible for adopting population and employment growth targets to ensure that each county collectively is accommodating projected population and employment. These population and employment growth targets are a key input to local comprehensive plans. Jurisdictions use growth targets to inform planning for land use, transportation, and capital facilities. The Regional Growth Strategy provides a regional framework for the countywide growth target process by defining expectations for different types of places.”

While we have always supported the use of Growth Targets and continue to do so, we remain taken aback by several jurisdictions outright exceeding them with little regard for surrounding communities. This tends to undermine the planning process and could provide ammunition to other jurisdictions to do the same, which could result in a collapse of true growth management to the detriment of our region.

**A Framework for Growth**

pp. 23-24:

“VISION 2050 builds on the state Growth Management Act framework and the regional emphasis of focusing growth into centers and near high-capacity transit options to create more sustainable communities and reduce emissions. Compared to past trends, the strategy encourages more population and employment growth in the largest and most transit-served communities in the region. Environmental review for VISION 2050 showed that, compared with a range of alternatives, this growth pattern would have significant benefits for mobility, air quality, environmental stewardship, and healthy communities.”

“The region’s varied rural areas offer a diverse set of natural amenities. Common features include small-scale farms, wooded areas, lakes and streams, and open spaces. Technically, rural lands are those areas that are not designated for urban growth, agriculture, forest, or mineral resources. Rural development can consist of a variety of uses and residential patterns...”
The “framework” detailed above is strong and best serves the Regional Growth Strategy detailed elsewhere. The description of the “rural areas” is clear and focused on the key aspects of rural character, which we continually strive to preserve in spite of a variety of external development pressures.

**Focusing Growth Near Transit and in Centers**

pp. 25-26:

**Regional Centers**

“The emphasis on the development of centers throughout the region is at the heart of VISION 2050’s approach to growth management. Regional growth centers are locations characterized by compact, pedestrian-oriented development, with a mix of office, commercial, civic, entertainment, and residential uses. Regional growth centers are envisioned as major focal points of higher-density population and employment, served with efficient multimodal transportation infrastructure and services. The Regional Centers Framework establishes two types of regional growth centers—metro growth centers and urban growth centers—and sets criteria and growth expectations for them. Metro growth centers are the densest and most connected places in the region and are expected to accommodate higher levels of growth.

The emphases on Regional Centers is a sound approach to growth management going forward, as is the Regional Centers Framework.

**The Regional Growth Strategy by the Numbers**

p. 34:

**Cities and Towns**

“Cities and Towns include a diverse array of jurisdictions, including places near major cities, small residential towns, and free-standing cities and towns surrounded by rural and resource lands. Cities and Towns provide important housing, jobs, commerce, and services in their downtowns and local centers. The region’s 42 Cities and Towns are expected to accommodate relatively less growth than historical trends and remain relatively stable for the long term. Many Cities and Towns are served by local transit options, but these jurisdictions are not connected to the regional high-capacity transit system. Some may not be served by scheduled fixed-route transit or be within a transit service district. Their locally-designated city or town centers provide local job, service, cultural, and housing areas for their communities. These local centers should be identified in local comprehensive plans and become priority areas for future investments and growth at the local level.

Cities inside the contiguous urban growth area will likely receive a larger share of growth due to their proximity to the region’s large 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 Regional Growth Strategy calls for 42 Cities and Towns to accommodate 6% of the region’s population growth and 4% of its employment growth by the year 2050.”

From Figure 11 (p. 35) such “cities and towns” include in King County (listed alphabetically): Black Diamond, Carnation, Covington, Duvall, Enumclaw, Maple Valley, North Bend, and Snoqualmie. Many of these are isolated—from a transportation perspective—and as such cannot accommodate much growth without further congesting the few already-busy lifeline roads to the “metropolitan” and “core” cities that possess most of the job opportunities. Unfortunately, most of these cities and towns do not appreciably “provide important housing, jobs, commerce, and services in their downtowns and local centers.” However, it is good to see the Regional Growth Strategy forecasts such areas receiving only “6% of the region’s population growth and 4% of its employment growth by the year 2050” and that the share within King County is expected to be less (per the last sentence under Figure 11 on p. 35: “Cities and Towns in Snohomish and Pierce counties are expected to accommodate a relatively higher share of their countywide growth compared to King and Kitsap counties.”—our emphases)

p. 37:

**Rural Areas and Natural Resource Lands**

“The Regional Growth Strategy includes shares of residential growth in rural areas. It encourages use of tools to reduce the amount of development in rural and resource lands, such as transfer of development rights into urban areas, and seeks to ensure that proposed levels of development are consistent with the character of rural and resource areas.”

**Rural Areas**

“Rural Areas are expected to retain important cultural, economic, and rural lifestyle opportunities in the region over the long term. They are not intended to be served with urban services or accommodate a significant amount of residential or employment growth. VISION 2050 calls for reduced rural population growth rates in all counties. Counties are encouraged to plan for even lower growth—where possible—than contained in the Regional Growth Strategy.”

This is a prudent short- and long-term strategy that should be continually adhered to and monitored to assure success.
“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 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.

• 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.

We believe this is critical and the region sees the plan put into action on the ground. Given our experience with cities near the Rural Area ignoring their Growth Targets with little regard for the neighboring cities or Rural Area, it is especially important that: “(t)argets should demonstrate how cities and counties are working towards the outcomes and objectives of the Regional Growth Strategy” and that “…jurisdictions will be asked to explain how the plan supports VISION 2050 and works to meet the Regional Growth Strategy over the long term.” This should ensure both the integrity and long-term endurance of the Regional Growth Strategy. We believe the key principles of aligning Growth Targets must be emphasized in any “regional review of countywide growth target allocations and comprehensive plan certification.”

Regional Growth Strategy Adjustments to Support Targets

“Cities and unincorporated areas are grouped into their respective regional geographies based on designated regional centers, planning for annexation and incorporation, and existing and planned high-capacity transit. PSRC recognizes that some of these qualities may change based on future planning. To reflect these changes, PSRC’s Executive Board may make a technical amendment to the Regional Growth Strategy to potentially reclassify cities and
VISION 2050 Draft Plan

unincorporated areas. Technical amendments are limited to those updates needed to support establishing Growth Management Act population and employment targets; other amendments to the Regional Growth Strategy are subject to approval by the General Assembly.”

We caution prudence here, as we expect jurisdictions will plead their cases to seek amendments to the Regional Growth Strategy to meet their perceived needs. It is extremely important the region adheres to limiting such amendments to “those updates needed to support establishing Growth Management Act population and employment targets.”

Regional Growth Strategy Policies (MPP-RGS’s)

pp. 44-45:

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

.....

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

.....

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.”

.....

MPP-RGS-11 — “Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by 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.”

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.”

We consider the six above listed Regional Growth Strategy policies (of a total of thirteen—all of which are pertinent and needed) as critical to ensuring the integrity of the VISION 2050 Plan:

• Implementing the “Regional Growth Strategy through regional policies and programs, countywide planning policies and growth targets, and local plans.” Such a followthrough down to local plans is imperative.

• Ensuring “development in rural areas is consistent with the regional vision.” This must be incumbent on each government.

• Attracting “65% of the region’s residential and 75% of the region’s employment growth to high-capacity transit station areas.” We expect this to be both the most difficult strategy to which to adhere and the most important to achieve.
VISION 2050 Draft Plan

- Avoiding “increasing development capacity … in regional geographies not served by high-capacity transit.” We expect local political pressures could be intense here and hope they will not overcome regional economic sense.
- Planning for “commercial, retail, and community services that serve rural residents to locate in neighboring cities and existing activity areas.” This most likely will require much collaboration between local governments and the business community.
- Managing/Reducing “rural growth rates over time, consistent with the Regional Growth Strategy, to maintain rural landscapes and lifestyles and protect resource lands and the environment.” This will take strong political will and continuous monitoring to succeed.

Regional Growth Strategy Actions (RGS-Actions)

<table>
<thead>
<tr>
<th>p. 45: Regional Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.”</td>
</tr>
</tbody>
</table>

We consider followthrough on this particular action as a critical tentpole to ensuring the Regional Growth Strategy succeeds.

<table>
<thead>
<tr>
<th>p. 46: Local Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>RGS-Action-4 — “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.”</td>
</tr>
</tbody>
</table>

Continually monitoring such local actions is critical to the success of VISION 2050. We contemplate several important questions to consider as part of this Local Action:

- Where will such “incentives” come from?
- Will available “infrastructure investments” be enabling or destabilizing?
- What “housing tools” will be most accommodating and prudent to employ?
- How best can “economic development” be directed, if any all?
p. 49: 
**Goal:** “The region cares for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, and reducing air pollutants. The health of all residents and the economy is connected to the health of the environment. Planning at all levels considers the impacts of land use, development, and transportation on the ecosystem.”

Too often we apply a short-term perspective to specific issues related to the environment. Unfortunately, doing so, causes us to miss the real overriding long-term issues that often are found to have the greatest impacts. We agree that our economy clearly is connected to the health of our shared environment and that both short- and long-term planning must consider the impacts that our land-use changes, building development, and transportation infrastructure have on our ecosystems. Such planning must not be done in a vacuum, but rather jointly on both subregional and regional scales, as what one jurisdiction does eventually impacts other jurisdictions.

**Habitat, Open Space, and Environmental Stewardship**

In early 2018 we provided comments on the *Regional Open Space Conservation Plan*. We continue to support its many objectives to identify conservation priorities to sustain our open spaces and ecological systems.

**Environment Policies (MPP-En’s)**

p. 55:

**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-7** — “Reduce and mitigate noise and light pollution caused by transportation, industries, public facilities, and other sources.”

p. 56:

**MPP-En-10** — “Support and incentivize environmental stewardship on private and public lands to protect and enhance habitat, water quality, and other ecosystem services.”

**MPP-En-12** — “Identify, preserve, and enhance significant regional open space networks and linkages across jurisdictional boundaries through implementation and update of the Regional Open Space Conservation Plan.”

**MPP-En-18** — “Reduce stormwater impacts from transportation and development through watershed planning, redevelopment and retrofit projects, and low-impact development.”

**MPP-En-20** — “Restore – where appropriate and possible – the region’s freshwater and marine shorelines, watersheds, and estuaries to a natural condition for ecological function and value.”
VISION 2050 Draft Plan

We consider the four above listed Environment policies (of a total of twenty-two—all of which are pertinent and needed) as critical to ensuring the environmental quality and the integrity of the Rural Area as the region grows.

Regarding MPP-En-5, “(l)ocate development in a manner that minimizes impacts to natural features, we have great concern that urban and urban-serving facilities often are considered to be located in the Rural Area to minimize land-acquisition costs. Such short-term thinking can result in long-term environmental impacts when infrastructure for such facilities eventually are needed or simply when existing infrastructure needs to be expanded to ensure proper functioning of the facility. All the more reason why such urban and urban-serving facilities should be located within the Urban Growth Area. We discuss this lingering concern further in the Economy and Public Services chapters.

Regarding MPP-En-7, “noise and light pollution” from industries and mining operations in or near the Rural Area are major concerns to residents. Yes, there are industries located within the Rural Area of King County on isolated parcels. Also, there exist gravel and materials processing operations contiguously surrounded by Rural Area lands, as also is the case with King County’s Cedar Hills Landfill—a massive operation near residential areas. We understand that PSRC has no control over County zoning, especially legacy zoning, but it should be recognized that these problem areas do exist and will become even larger concerns to residents as the region (and the Rural Area) grows in population.

Coupling MPP-En-18 and MPP-En-20, “watershed planning, redevelopment … projects” could include restoring drained or degraded wetlands, ponds, and re-routed streams to bring such ecosystems back to life and allow them to perform the ecological services we need, including stormwater management and filtering.

Environment Actions (En-Actions)

| p. 57: |
| Regional Actions |
| En-Action-2 — “Watershed Planning Support: PSRC and the Puget Sound Partnership will coordinate to support watershed planning to inform land use, transportation, and stormwater planning and projects that improve the health of Puget Sound.” |
| En-Action-3 — “Watershed Planning: Counties and cities, together with other jurisdictions in the watershed, will participate in watershed planning to integrate land use, transportation, stormwater, and related disciplines across the watershed to improve the health of Puget Sound.” |

We support both Regional Actions above, but suggest expanding each of their scopes to include other important bodies of water beyond only Puget Sound itself. Rivers and streams, part of critical watersheds, feed Puget Sound and are inextricably linked to its long-term health.
Local Action En-Action-4 — “Local Open Space Planning: Counties and cities will 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.”

Such cross-jurisdictional planning is necessary, but insufficient, if not accompanied by thorough joint cooperation and all-important followthrough.
VISION 2050 Draft Plan

Climate Change
MPP: Climate
(pp. 59-66)

p. 59:

Goal: “The region substantially reduces emissions of greenhouse gases that contribute to climate change and prepares for climate change impacts.”

We all share this responsibility, whether we are an urban resident, a rural farmer, a commuter, or simply a consumer. Climate Change often has been looked at as a long-term concern, but we rapidly are seeing changes in the here and now that make us all realize that it also impacts us on a short-term basis. Consequently, we support this Goal to substantially reduce emissions.

p. 59:

“Climate change is an urgent environmental, economic, and equity threat being addressed at all levels, from the local to an international scale. Caused by an increase in greenhouse gases trapping heat in the atmosphere, climate change is a significant cross-cutting issue throughout VISION 2050.”

…..

“In the Puget Sound region, the largest sources of greenhouse gases come from transportation [40%] and the built environment, including residential [21%], commercial [19%], and industrial [17%] activities.”

“Within the residential and commercial built environment, electricity consumption represents the largest share of emissions. Within the transportation sector, passenger vehicles represent the largest share (74%), followed by freight and service vehicles (14%).”

Although much has been done to keep growth within the Urban Growth Area and to reduce commute trips and distances, we continue to experience sprawl and people moving further away from jobs to find affordable housing. When it comes to combating climate change, all the issues do mix together and this must be recognized to adequately address them.

State, Regional, and Local Activities

p. 61:

Four-Part Greenhouse Gas Strategy

…..

“VISION 2050’s Regional Growth Strategy, multicounty planning policies and actions promote compact growth patterns, low-carbon travel choices, forest and open space protection, and other sustainability strategies that help mitigate greenhouse gas emissions and prepare for the impacts from climate change.”

We support the Four-Part Greenhouse Gas Strategy in our comments below on its elements.
p. 63:  
**Land Use**  
“Over the last decade, many land use actions, programs, and planning activities have been advanced. Examples include local adoption of growth targets within each county in the region and continued work on transit-oriented development. As part of the VISION 2050 Regional Growth Strategy, growth will be further concentrated around transit stations throughout the region, which will help the region continue to reduce emissions. Additional reductions could be achieved at the local level through changes to development patterns that create attractive, compact, and walkable environments, and that encourage location of new residential and commercial construction close to services and amenities, lessening the need for driving.”

We believe there needs to be more teeth in the setting and enforcement of growth targets, if we really intend to meet our region’s goals as we continue to grow. Also, transit-oriented development within the Urban Growth Area is the only sustainable path forward.

p. 63:  
**User Fees**  
“User fee systems are in place on several facilities in the region, including State Route 167, Interstate 405, State Route 520, the Tacoma Narrows Bridge and the State Route 99 tunnel through downtown Seattle. The Regional Transportation Plan’s financial strategy assumes a transition from traditional pricing mechanisms to a user fee system, including selected facility tolls and a road usage charge system, after 2025.”

“Research suggests that increasing the tolls could result in a change in travel behavior and demand, moving more trips away from single occupant vehicles. VISION 2050 calls for further pursuit of alternative transportation financing mechanisms.”

As we provided in our January 2018 comments on the Regional Transportation Plan, a “road usage charge system” will alleviate many problems enumerated therein, including having Rural Area taxpayers essentially subsidize (primarily through their property taxes) urban commuters who use County roads to traverse from city to city. Such user-pays market-based solutions make sense and should be implemented over time. More equitable funding of Rural Area roads should be established so those roads, which regularly serve County urban residents and/or businesses, support the efficient and timely movement of people and goods.

p. 63:  
**Transportation Choices**  
“Significant investments have been made over the last decade to provide multimodal transportation improvements, including new trails, bus rapid transit and light rail services, and high occupancy vehicle lanes. The Regional Transportation Plan includes a coordinated network of regional and local transit investments, resulting in significant improvements in frequent transit service throughout the region.”
Such improvements in transit service are necessary, but clearly not sufficient if busses are crawling or, worse, idling in the same traffic as everyone else. Consequently, there will need to be more bus-only lanes to allow quick movement between stops. Otherwise transit use will suffer and congestion will continue to build throughout the region. Further, a *regional* perspective must be ensured whereby intercity needs and uses are addressed and accommodated by accurately describing impacts to all elements of the transportation network regardless of jurisdiction.

We support such innovative programs as providing incentives and/or credits for carbon sequestration, for example, allowing soils to act as a carbon sink, by leaving some farmland fallow each growing season, or by planting more trees.

**Climate Change Policies (MPP-CC’s)**

We consider this Regional Growth Strategy policy (of a total of nine—all of which are pertinent and needed) as critical to ensuring the integrity of the Rural Area. Such sequestration and subsequent storage are key elements of the strategy and ones that could make use of Rural Area farmlands, wetlands, and trees. As mentioned earlier, this could be part of a carbon credit program.

**Climate Change Actions (CC-Actions)**

We support this Local Action, but have a concern about followup. We assume PSRC, in its review and certification of Comprehensive Plans, will assess how each jurisdiction incorporates such policies and actions in its plan and how they support VISION 2050 goals in this area.
p. 69:
**Goal:** “The region creates walkable, compact, and equitable transit-oriented communities that maintain unique local character, while creating and preserving open space and natural areas.”

We agree with this Goal, but would add to it as follows to include recognition of the Rural Area:

“The region creates walkable, compact, and equitable transit-oriented communities that maintain unique local character, while conserving rural areas and creating and preserving open space and natural areas.”

p. 69:
“VISION 2050 addresses a spectrum of land use planning issues, including aligning transportation investments with rates of development, managing growth in rural and resource areas, planning for the transition of unincorporated areas into cities, involving diverse voices in planning, community design, and preserving special land uses. Each of these tools and approaches is important for achieving the Regional Growth Strategy and accommodating new growth while supporting and enhancing existing communities.”

We strongly agree. Members of the Public should be fully engaged at all levels to ensure such land-use planning issues are addressed in a sustainable manner. There are several potential obstacles to achieving the Regional Growth Strategy including built-in lags in meeting transportation concurrency (e.g., 6 yr between identification of funds and actual improvements on the ground); unwanted sprawl trickling from the urban fringe; and “orphaned” urban unincorporated areas seeking urban-level services which most counties often cannot economically provide sufficiently or in a timely manner.

**Centers: Supporting Connections to Opportunities**

p. 74:
“VISION 2050 calls for PSRC to work with transit agencies and local jurisdictions to develop guidance for transit-supportive densities. Additionally, policies support the development of centers in all communities to provide opportunity for all the region’s residents to live, work, and play.”
VISION 2050 Draft Plan

Yes, this directly supports the Goal, but it could prove difficult to achieve, as it primarily will be market driven and, thus, not truly something that can be designed and implemented per any planning documents, but rather through supportive policies.

p. 74:
Regional Centers
“The entire region benefits from central places that are connected by transit. A limited number of regional centers are formally designated by PSRC to accommodate a significant share of the region’s growth and development and implement the Regional Growth Strategy. PSRC’s Regional Centers Framework [https://www.psrc.org/sites/default/files/final_regional_centers_framework_march_22_version.pdf] has further refined the different types and expectations of regional centers.”

The Regional Centers Framework is good and possesses Performance Measures to gauge progress, but much will be dependent upon each individual jurisdiction’s progress, economic vitality, market factors, and availability of funding. We have not seen any further definition of this since the March 22, 2018, Regional Centers Framework Update.

p. 74:
Countywide Centers, Local Centers, and Transit Station Areas
“Countywide growth centers, countywide industrial centers, and local centers serve important roles as central places for activities and services and places where future growth can occur. These local hubs are identified and designated by the region’s countywide groups and local jurisdictions. Countywide planning policies and local comprehensive plans describe the local expectations of these places. Countywide centers are expected to accommodate new population and employment growth.”

Again, much will be dependent on followthrough in county and local comprehensive plans and code; favorable economic market factors; adequate and timely infrastructure; and, possibly, competition.

p. 76:
Figure 24 – Types of Centers and Transit Station Areas
“Countywide Growth Center: Designated through the countywide process to serve as compact, mixed-use development within a city or unincorporated urban area....”
“Countywide Industrial Center: Designated through the countywide process to serve as important local industry areas within a city or unincorporated urban area....”

We question how such “Growth” and “Industrial” Centers would be viable in unincorporated urban areas that often lack an adequate tax base to support the necessary infrastructure, thus possibly setting up a “chicken or the egg” causality scenario. Consequently, it is not clear how either...
“Growth” and “Industrial” Centers would be suitable for cities on the urban fringe or unincorporated urban areas, neither of which are “central places for activities and services and places where future growth can occur” (from the last paragraph on p. 74).

---

**Annexation and Incorporation**

p. 79:

“This regional plan expects that by 2050 all urban area will be annexed into existing cities or incorporated as new cities, but also recognizes the challenges of this goal. PSRC, counties, and cities will continue to work together to address barriers to annexation and incorporation through supporting necessary changes to state annexation laws, opportunities for state and local incentives, and joint planning efforts.”

This has been a continuing issue associated with annexation. The Plan rightly identifies the obstacles that must be overcome, especially “state and local incentives,” specifically, financial ones. A specific issue we have identified in the past to State, PSRC, and County officials is that of “annexation debt transfer.” When funds to improve or maintain roads are secured by a Bond, the repayment of the debt is based upon the anticipated repayment from a relatively fixed number of properties. Yet, some of the properties eligible (i.e., presumed to repay the debt) are absolved of such responsibility when annexed into an adjacent city, which does not assume such debt. Thus, the encumbered debt is re-distributed to the remaining unincorporated properties, even if the improved roads are now within a city. It is desired that Counties have consistent opportunities to require bonded debt obligations transfer with residents upon annexation. Cities and counties should work together to determine how debt incurred in now-annexed formerly unincorporated areas, which benefit from road improvements, is repaid until fully retired. The rigidness of State law could be revisited so that Counties and Cities have the opportunity to “negotiate” any transfer of bonded debt incurred within the annexed area. Approval of County bonded debt could be similar to how cities do so upon annexation by offering a vote to the annexing residents and allow the county to require a disapproval of the annexation should residents vote against the bonded debt continuance.

---

**Conserving Traditional Landscapes: Rural Areas and Natural Resource Lands**

p. 80:

“The region's rural areas have distinct characteristics, just as the urban growth area does. Among the region’s rural lands are areas with different ecological functions, parcel sizes, and uses. Rural areas provide opportunities for a lifestyle that makes a distinct contribution to the region’s sustainability and economy. By focusing the majority of the region's growth inside the urban growth area, lands with rural character can be maintained for present and future generations.”

“Washington state law enables development to occur based on regulations in effect at the time that a building permit or land division application was submitted – a practice known as vesting. This can lead to situations where development approved before adoption of
We agree that a balanced approach on vesting is necessary to conserve our Rural Area and Natural Resource Lands. Clearly, existing tools, such as Conservation easements, Transfer of Development Rights (TDRs), Stewardship programs, etc., must be maintained and enhanced. The use of targeted tax incentives could prove useful.

Supporting Growth Through Concurrency

p. 82:

“State concurrency requirements underlie a fundamental premise of growth management – namely, that development should occur concurrent with where adequate facilities and infrastructure already exist or are to be provided in the near future. Local governments have a significant amount of flexibility in applying concurrency provisions. . . .”

“Under the Growth Management Act, part of the concurrency requirement is the establishment of level-of-service standards for arterials, transit service, and other facilities. These standards are used to determine whether a proposed development can be served with available facilities, or whether mitigation of some sort may be required. The law requires cities and counties to have a reassessment strategy in the event of a service deficiency or shortfall. Such a strategy allows a jurisdiction to consider: (1) other sources of funding to provide the service, (2) changing the level-of-service standard that was established, and/or (3) reconsidering the land use assumptions.”

“Washington state law encourages handling transportation-related concurrency problems with solutions such as transit, walking or biking, system efficiencies, and transportation demand management. Improved coordination among the concurrency programs established by neighboring jurisdictions helps to address the cross-jurisdictional impacts of development and facility needs. . . .”

We believe Concurrency was a great idea, but was “compromised to death” as to be relatively ineffective. However, if properly re-structured, it can be used to solve several growth-related issues. Concurrency as embodied in State law has too many “loopholes.” The biggest being no apparent Concurrency enforcement mechanism.

Several issues with applying Concurrency and setting Level-of-Service (LOS) standards are:

1. Holistic concepts like Travel Sheds (by which King County recognizes the interconnected nature of transportation in a way analogous to watersheds) have limitations in that they stop at jurisdictional boundaries (probably not the “natural” Travel Shed boundary).
2. Lack of meaningful coordination with neighboring jurisdictions on an equal basis.
VISION 2050 Draft Plan

(3) Integrated "regional" transportation concurrency is extremely difficult.
(4) Some jurisdictions define LOS based on "average" degree of travel comfort (intersection delay, road speed, capacity, "screenline," distance traveled) which easily disconnects from user experience, allowing development with little infrastructure investment.
(5) Jurisdictions can greatly exceed growth targets and appear to have no obligation to create internal job opportunities equivalent to the internal growth they routinely permit.
(6) The Public is usually not engaged when jurisdictions adopt LOS standards and, thus, unique subarea desires are not clearly identified, if at all.

It is desired Concurrency be managed holistically without jurisdictional "seams." Measurement must recognize "natural" interconnected travel patterns and be used consistently by all jurisdictions. Infrastructure needs should be timely met embracing best-available growth/employment forecasts. Measurement must align to travel experience (moving people and freight).

We see several potential solution paths for discussion:
(1) Policies that require population, growth, and revenue databases could be continuously updated and used to conduct periodic traffic modeling and impact analyses.
(2) Legislation could be enacted that strengthens requirements for a demonstrated LOS link to public dialog.
(3) Mechanisms could be established so the Growth Management Planning Council and/or the PSRC can:
   (a) Enforce the requirement that jurisdictions create job opportunities at least equal to the population growth they permit within their jurisdictions.
   (b) Ensure consistency in analyzing developments’ regional impacts across all jurisdictions.
   (c) Implement policies to ensure jurisdictional seams are addressed or removed.
   (d) Scrutinize "financial commitments" to ensure they are real and attainable.
   (e) Enforce the requirements of Concurrency are met as intended.

We have identified the following RCWs and WACs that could provide such opportunities:

RCW 36.70A--GROWTH MANAGEMENT--PLANNING BY SELECTED COUNTIES & CITIES.
36.70A.020--Planning Goals [see 12. Public facilities and services].
36.70A.070--Comprehensive Plans--Mandatory Elements [see (6) transportation element].

WAC 365-196-840--CONCURRENCY. (4) Measurement Methodologies

Development Pattern Policies (MPP-DP’s)

pp. 82-87:

MPP-DP-13 — “Recognize and work with linear systems that cross jurisdictional boundaries – including natural systems, continuous land use patterns, and transportation and infrastructure systems – in community planning, development, and design.”

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.”

MPP-DP-30 — “Promote transit service to and from existing cities in rural areas.”
VISION 2050 Draft Plan

MPP-DP-31 — “Contribute to improved ecological functions and more appropriate use of rural lands by minimizing impacts through innovative and environmentally sensitive land use management and development practices.”

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

MPP-DP-33 — “Avoid new fully contained communities outside of the designated urban growth area because of their potential to create sprawl and undermine state and regional growth management goals.”

MPP-DP-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.”

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.”

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

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

MPP-DP-38 — “Support long-term solutions for the environmental and economic sustainability of agriculture and forestry within rural areas.”

MPP-DP-39 — “Support the sustainability of designated resource lands. Do not convert these lands to other uses.”

MPP-DP-43 — “Work to conserve valuable rural and resource lands through techniques, such as conservation programs, transfer of development rights, and the purchase of development rights. Focus growth within the urban growth area, especially cities, to lessen pressures to convert rural and resource areas to residential uses.”

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

MPP-DP-50 — “Develop concurrency programs and methods that fully consider growth targets, service needs, and level-of-service standards. Focus level-of-service standards for transportation on the movement of people and goods instead of only on the movement of vehicles.”

We consider the fifteen above listed Development Patterns policies (of a total of fifty-two—all of which are pertinent and needed) as critical to ensuring the integrity of the Rural Area as the region grows. We consider these policies as very important to both controlling growth and conserving and preserving our Rural Area and Natural Areas. However, of particular note are:

• “Cross-jurisdictional boundaries” are not a roadblock, but rather an opportunity to ensure our transportation infrastructure is continuous and multipurpose.

• While promoting “transit service to and from existing cities in Rural Areas” is important, it also must be recognized that cities on the urban fringe also must receive increased transit service to lower the incredible burden they place on County road networks.

• Although avoiding “new fully contained communities outside of the designated urban growth area” is prudent, it must be recognized that cities on the urban fringe, which approve such massive master-planned developments, cause very similar problems, especially on fragile and continually underfunded County road networks.
VISION 2050 Draft Plan

• We strongly agree with “avoiding the construction of new highways and major roads in rural areas,” but we also must recognize that existing roads in rural areas already are overburdened with urban commuters using them to traverse from city to city.
• We must recognize there is a constant pressure to “convert” “designated resource lands” “to other uses.” We have found this especially true with mining lands that, once exhausted of their mineral wealth, become prime targets for residential development with owners seeking zoning changes. Although “growth” is focussed “within the urban growth area (UGA),” such pressures will continue, since the lands outside the UGA, generally, often are much less costly to acquire and develop.

Development Pattern Actions (DP-Actions)

<table>
<thead>
<tr>
<th>p. 88: Regional Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>DP-Action-5 — “Concurrency Best Practices: PSRC will continue to develop guidance on innovative approaches to multimodal level-of-service standards and regional and local implementation strategies for local multimodal concurrency. PSRC, in coordination with member jurisdictions, will identify approaches in which local concurrency programs fully address growth targets, service needs, and level-of-service standards for state highways. PSRC will communicate to the Legislature the need for state highways to be addressed in local concurrency programs.”</td>
</tr>
</tbody>
</table>

We fully support modernizing Concurrency to address today’s issues that were not fully anticipated a quarter century ago, in 1993, when the GMA was enacted. It appears that a “regional” perspective should be introduced to Concurrency Testing, as the “silo-mentality” of Concurrency Testing never made sense to begin with and has proven to be an unfortunate failure. We also fully support eliminating the omission of not requiring Concurrency Testing for Highways of Statewide Significance (HSSs), which essentially gave them a pass, thus making local Concurrency Testing incomplete, at best, and largely ineffective, at worst. We have been told by State legislators this was never the intent. Clearly, this must be fixed.
**Vision 2050 Draft Plan**

**Housing**

**MPP: Housing**  
(pp. 91-98)

---

**p. 91:**

**Goal:** “The region preserves, improves, and expands its housing stock to provide a range of affordable, accessible, healthy, and safe housing choices to every resident. The region continues to promote fair and equal access to housing for all people.”

---

We support the Goal, but believe it also should address employment, since planning for housing and jobs must go together (as described very well under the Jobs-Housing Balance section below), thus we recommend the following additions:

“The region preserves, improves, and expands its housing stock close to job centers to provide a range of affordable, accessible, healthy, and safe housing choices to every resident. The region continues to promote fair and equal access to housing for all people.”

---

**Jobs-Housing Balance**

---

**p. 96:**

“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.”

---

This is an extremely important planning concept, but one where the followthrough has proven to be difficult. Cities plan for both housing and commercial growth, but often attract the former, while the latter lags behind or, worse, never materializes at a level that provides the city an adequate tax base to provide needed services and infrastructure for both residents and businesses. This especially is prevalent for cities along the edge of the Urban Growth Boundary (i.e., the “urban fringe”), which quite often businesses have tended to avoid (due to lower population densities, longer supply lines, etc.) or attract primarily retail businesses that often provide only low-paying jobs further adversely impact the tax base. As a result, such cities exhibit a great imbalance, i.e., being housing rich and employment poor. This then results in even more commuters traveling even longer distances. Consequently, we agree policies need to encourage housing in job-rich locations and not hope for jobs to materialize in housing-rich locations, which often appears to be what some cities continue to do.
Regional Actions
H-Action-2 — “Regional Housing Assistance: PSRC, …, will assist implementation of regional housing policy and local jurisdiction and agency work. Assistance shall include the following components:
• Guidance for developing local housing targets (including affordable housing targets), model housing policies, and best housing practices

While we understand the desire to establish “housing targets,” we are wary that, in the absence of meaningful levels of potential employment opportunities, a severely skewed “job-housing balance” could and, most likely will, be the unintended result.

Local Actions
H-Action-4 — “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.”

Again, achieving “housing targets” is insufficient without also concentrating on attracting jobs. Consequently, we urge that local comprehensive plans couple and, thus, focus on both jobs and housing simultaneously and describe how a “job-housing balance” will be achieved.
VISION 2050 Draft Plan

Economy
MPP: Economy
(pp. 101-108)

p. 101:

Goal: “The region has a prospering and sustainable regional economy by supporting businesses and job creation, investing in all people, sustaining environmental quality, and creating great central places, diverse communities, and high quality of life.”

We support the Goal and VISION 2050 aim for a better jobs-housing balance.

Thriving Communities for People and Businesses

p. 104:

“VISION 2050 recognizes the importance of employment in cities and towns in rural areas and resource-based economic activity. Targeted efforts are needed to support jobs in industries compatible with rural communities, at a size, scale, and type that are compatible with the long-term integrity, productivity, and character of these areas.

The movement of people and goods throughout the region is crucial to the continued success of the economy and for growth of jobs and businesses. VISION 2050 calls for a transportation system that connects the region’s centers and supports the economy through the movement of people and freight throughout the region.”

We share particular concerns with strategies that both directly or indirectly impact the Rural Area. Rural lands and rural character should be preserved by ensuring urban and urban-serving facilities remain in urban areas. We can sustain and help grow our local rural economies by protecting farmlands, forests, and open space, while encouraging recreational use that is compatible with environmental interests and local culture.

It should be recognized that King County already permits a wide range of commercial activities throughout the Rural Area under Home-Based Occupations (K.C.C. 21A.30.085 Home occupations in the A, F and RA zones), and Home-Based Industries (K.C.C. 21A.30.090 Home Industry). These include specific zoning for: Neighborhood Businesses in rural towns or rural neighborhood centers (K.C.C. 21A.04.090 Neighborhood business zone). There also exists isolated Industrial-zoned parcels within King County’s Rural Area.

Equitable mechanisms must be found to maintain rural transportation infrastructure that is increasingly used by urban commuters to travel to other urban areas without compromising the character, productivity, and prosperity of rural communities. The availability of inexpensive broadband access within the Rural Area should be ensured to facilitate telecommuting, distance learning, and small businesses that depend upon high-speed internet access.
Economy Policies (MPP-EC’s)

p. 107:

MPP-EC-18 — “Develop and provide a range of job opportunities throughout the region to create a closer balance between jobs and housing.”

MPP-EC-19 — “Support economic activity and job creation in cities in the rural areas at a size, scale, and type compatible with these communities.”

We consider the two above listed Economy policies (of a total of twenty-three—all of which are pertinent and needed) as critical to ensuring the integrity of the Rural Area as the region grows. We support policies to promote a better “balance between jobs and housing.” We do see some major problems with compatibility due to old “legacy” industrial zoning in the Rural Area. Two examples are: the proposed move of an Asphalt Facility from the City of Covington, inside the Urban Growth Area, to the Rural Area along the Cedar River and the proposed Marijuana Factory in a residential neighborhood near a Church in the Rural Area. Neither of these examples are in “cities in the rural areas.”

p. 107:

MPP-EC-23 — “Support economic activity in rural and natural resource areas at a size and scale that is compatible with the long-term integrity and productivity of these lands.”

We support this Policy, but are concerned about the specific details of each proposal. For example, we have seen examples of closed mines that seek re-development into large residential tracts, but are subject to the State’s Model Toxics Control Act (MTCA) and remain highly polluted and under rigorous long-term monitoring. We also have seen examples where mining, materials processing, composting facilities, and waste landfills have either been expanded in footprint or become far busier than originally intended—all to the detriment (i.e., noise, air and water pollution, road congestion, etc.) of nearby Rural Area residents, thus becoming more and more incompatible in their locations.

Economy Actions (EC-Actions)

p. 107:

Regional Actions

EC-Action-1 — “Regional Economic Strategy: PSRC and the Economic Development District will coordinate economic development efforts to strengthen the region’s industries, economic foundations and to implement the Regional Economic Strategy. Update the Regional Economic Strategy periodically.”

We provided comments on the draft Regional Economic Strategy in early 2018 and generally support its goals and strategies. However, we recommend that Rural Area unincorporated area councils/associations like ours be afforded the opportunities to join PSRC Boards, such as the Economic Development District Board, and not simply rely on “representation” through County “proxies.”
We will continue to monitor the Economic Development Elements of jurisdictional comprehensive plans. We will continue to review and comment on King County’s Comprehensive Plan updates. During our reviews we will continue to ensure State law is met, especially RCW 36.70A.011 (our emphases):

“The legislature finds that this chapter is intended to recognize the importance of rural lands and rural character to Washington's economy, its people, and its environment, while respecting regional differences. Rural lands and rural-based economies enhance the economic desirability of the state, help to preserve traditional economic activities, and contribute to the state's overall quality of life. . . . [T]he legislature finds that in defining its rural element under RCW 36.70A.070(5), a county should foster land use patterns and develop a local vision of rural character that will: Help preserve rural-based economies and traditional rural lifestyles; encourage the economic prosperity of rural residents; foster opportunities for small-scale, rural-based employment and self-employment; permit the operation of rural-based agricultural, commercial, recreational, and tourist businesses that are consistent with existing and planned land use patterns; be compatible with the use of the land by wildlife and for fish and wildlife habitat; foster the private stewardship of the land and preservation of open space; and enhance the rural sense of community and quality of life.”
Vision 2050 Draft Plan

Transportation

MPP: Transportation

(pp. 111-122)

p. 111:

**Goal:** “The region has a sustainable, equitable, affordable, safe, and efficient multimodal transportation system, with specific emphasis on an integrated regional transit network that supports the Regional Growth Strategy and promotes vitality of the economy, environment, and health.”

While an admirable Goal, it must be recognized the region, as a whole, and in specific areas probably will never be able to attain it, because all we can do is “band-aid” our existing infrastructure, making it better in some areas served by a “regional transit network,” but only for a minority of the population.

The accompanying text lauds a historic level of investments in multimodal transportation systems; however, Figure 30 – Share of Commuters, Travel Time Greater than 1 Hour, 2010-2017, documents in blunt fashion how tragically our current transportation system fails to provide sufficient capacity to match the region’s growth. This unfortunate outcome is the end result of 50 years of planning by PSRC and its predecessor organizations and the disconnect between visions cast and results obtained is in large part because PSRC has no legal power to enforce the vision and the region lacks adequate funding for the capacity improvements needed.

As previously mentioned in earlier sections, action at the State level is needed to ensure all local jurisdictions take seriously the need to comply with growth targets and to find new funding mechanisms to implement the plan. Furthermore, if our grandchildren are to inherit a livable planet, then the vision to greatly reduce greenhouse gas emissions by 2050 must also have enforcement priority.

Clearly, the time has come to comprehensively address such monumental issues head on. The spirit of innovation that characterizes our region encourages optimism that creative thinking will provide new solutions to the seemingly impossible plethora of critical issues before us.

p. 111:

“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.”

Unfortunately, “high-capacity transit” includes busses, which often do not have dedicated transit lanes on which to travel and, thus, are stuck in the same congestion as everyone else. Consequently, without a vast expansion of transit-only lane-miles, these goals will not be achieved.
The planning, coordination, and data collection/development/assessment roles PSRC plays in the region are critical to helping us meet our goals, but PSRC also is quite limited when it comes to execution of such plans.

The Regional Transportation Plan

When discussing planning “beyond the borders of individual jurisdictions,” we must recognize the built-in “silo effect” each jurisdiction plans under, often resulting in jurisdictional “seams.” To further discuss this, below, we have updated the Comments we submitted in January 2018 on the Draft Regional Transportation Plan (RTP), as they still remain very relevant today and to VISION 2050:

Concurrency must be managed holistically without jurisdictional “seams.” Measurement must recognize “natural” interconnected travel patterns and be used consistently by all jurisdictions. Infrastructure needs should be timely met (i.e., the allowed 6-yr lag in starting infrastructure development on the ground clearly has proven to be unsatisfactory) embracing best-available growth/employment forecasts and align with the travel experience (moving people and freight).

Infrastructure needs should be identified as early and accurately as possible, with implementation of identified improvements truly “concurrent,” otherwise the development approval must be delayed or denied. Concurrency must be linked to a public dialog. Concurrency must have an “enforcement mechanism,” which must be exercised (this is one of the most critical problems).

We see several potential solution paths to be explored:

1. Policies that require population, growth, and revenue databases could be continuously updated and used to conduct periodic traffic modeling/impact analyses.
2. Legislation could strengthen requirements for LOS to be linked to public dialog.
3. Mechanisms could be established so the PSRC can:
   a. Enforce the requirement that jurisdictions create job opportunities at least equal to the population growth they permit within their jurisdictions;
VISION 2050 Draft Plan

(b) Ensure consistent methods for analyzing regional impacts of development across adjacent and nearby jurisdictions;
(c) Implement policies to remove jurisdictional seams from Concurrency;
(d) Scrutinize “financial commitments” to ensure attainable sources of funds (perhaps even requiring such “committed” funds be deposited into escrow accounts, rather than believing promises of future payments from developers and/or investors who are no longer available when the money is needed); and
(e) Enforce the requirements of Concurrency are met as intended.
(f) Enforce policies that give equity in policymaking to rural, as well as urban and suburban residents.

We see important roles for the PSRC is addressing Regional Transportation Concurrency. The PSRC could coordinate concurrency programs established by local jurisdictions to address regional cross-jurisdictional impacts of development. The PSRC could ensure jurisdictions perform “regional” traffic-impact analyses as a condition for certification of their Comprehensive Plans and/or any requested changes in their Growth Targets through the appropriate county Growth Management Planning Council.

We think that a more far-reaching solution would be to enact at the State level the powers necessary for PSRC to develop and manage a holistic concurrency program for all the facilities in the Regional Transportation Plan using ideas such as listed above, and require local jurisdictions to recognize and follow that regional concurrency program within their own development management procedures. This also would restore the original intent of the GMA sponsors to account for Highways of Statewide Significance within concurrency. Local concurrency questions would thus focus solely on local facilities, which would also better support understanding of the program by local residents.

We think that a similar regional approach to transportation impact fees would also be a positive step forward. Such a mechanism could account systematically for multi-modal issues, relate impact fees to trip lengths across the region, and, thus, allow us to better contain growth in outlying areas and implement our climate change policies.

p.113:

“Together, VISION 2050 and the Regional Transportation Plan serve to coordinate transportation planning and project implementation across jurisdictions and at the local level. The 2018 Regional Transportation Plan plans for investments through the year 2040. The 2022 update to the plan will identify the investments necessary to serve an additional decade of growth to 2050.”

Will this process identify the full set of transportation improvements needed to achieve a better mobility outcome than the current state of regional multi-area congestion? We recommend setting regional Level of Service standards in such a way as to lead to reducing of average travel times regionwide from current levels to something comparable to 1990 levels, or other similar goal.
Unfortunately, Figure 31 does not show any Bus Rapid Transit to the cities of Covington, Maple Valley, Black Diamond, and Enumclaw, in spite of serious congestion on the highways connecting those cities to the metropolitan core areas. The 2022 update to the Regional Transportation Plan should correct that omission in the commuter corridors to/from these cities. The commute trip length for residents of these cities is longer than average and any diversion of commuters into transit and ride-sharing modes for these areas will have above-average benefits toward reducing chronic congestion and striving towards the goal of reducing greenhouse gas emissions.

Supporting People

“An equitable transportation system supports broad mobility and connectivity, prioritizes an effective and affordable public transportation network that supports transit-dependent communities, and provides access to core services and amenities, including employment, education, and health and social services. It includes providing access to transportation choices for all, ensuring that travel times to key destinations are reasonable for all people, and requires assessing how the region can better connect places that have low access to opportunity to places that have more opportunity.”

Equity concerns should also account for protecting Rural Area residents from the daily consequences of large numbers of city-to-city commuters using rural roads, as a consequence of the regional policy to preserve and sustain rural areas (see more below at MPP-T-23).

A Sustainable Transportation System

“As traditional sources of revenues supporting transportation become less reliable, the pursuit of alternative transportation financing mechanisms such as roadway pricing and other user fees will be key to developing and managing a sustainable transportation system into the future.”

The current fuel tax is unsustainable. However, a user fee is unfair unless combined with parameters that account for a vehicle’s weight (wear and tear on the infrastructure), mileage (impacts on the environment), etc. How we fund our transportation infrastructure must account for “benefits” received and “costs” imposed (i.e., impacts that result in the need for monies to resolve the new impacts). This has been a major concern of Rural Area residents, who routinely pay more for King County road maintenance (through their property taxes) than do the majority of the users of these roads who are traversing same to go from city to city. The devil will be in the details, as it will be difficult to find a mechanism to impose tolls on smaller, but heavily used (e.g., often subject to both AM and PM 3+-hr peak-hour congestion), King County roads, such as the Auburn-Black...
VISION 2050 Draft Plan

Diamond Rd, Avondale Rd, Issaquah-Hobart Rd, May Valley Rd, Novelty Rd, etc. Many of these directly serve as feeders to State Routes and, as such, suffer from large traffic volumes.

Transportation Policies (MPP-T's)

| MPP-T-3       | “Reduce the need for new capital improvements through investments in operations, pricing programs, demand management strategies, and system management activities that improve the efficiency of the current system.” |
| MPP-T-6       | “Pursue alternative transportation financing methods, such as user fees, tolls, and other pricing mechanisms to manage and fund the maintenance, improvement, preservation, and operation of the transportation system.” |
| 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-T23      | “Avoid construction of major roads and capacity expansion on existing roads in rural and resource areas. Where increased roadway capacity 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.” |

We consider the four above listed Transportation policies (of the total of thirty-four— all of which are pertinent and needed) as critical to ensuring the integrity of the Rural Area as the region grows.

We have some specific comments on the latter, MPP-T23. This policy means well, but misrepresents the actual problem the Rural Area, which is the current failure of state highways to provide adequate capacity for existing travel volumes between cities, leading to large diversions of city-to-city traffic onto rural roads as a bypass to the overloaded State highways.

Upgrading rural roads to serve city-to-city movements is the wrong answer. Issaquah-Hobart Road is a good example. We have independently studied the user patterns of this corridor and recently determined that ~75% of the traffic passing through Hobart is coming from cities to the south, and a majority of that is actually coming from the Enumclaw area (in the pre-Black Diamond MPD era). Other studies have found most of the traffic entering Issaquah from the south passes through to cities such as Bellevue and Redmond.

We conclude such traffic is passing through rural Hobart and Ravensdale as a bypass around congestion on SR 169 from Renton to/through Maple Valley, not to mention I-405 for some of them. This is not fair, just, or equitable to Rural Area residents. The State highway system is chartered to provide for travel between cities, and should therefore provide adequate capacity for at least the existing travel volumes and that the regional growth vision be supported by transit solutions as well in this corridor. If the regional strategy to discourage sprawl in outlying areas will be to tacitly allow congestion to grow on State highways like SR 169, then justice for Rural Area residents requires a collateral policy and action plan to protect rural roadways from the spillover
VISION 2050 Draft Plan

effects such as now witnessed daily on the corridor between SR 18 and the city of Black Diamond via the continuous route consisting of Issaquah Hobart Road, 276th Avenue SE, Landsburg Road, and Ravensdale Way. One possibility for protecting such rural roads may be to declassify them from arterial to collector status with enforcement efforts to discourage through traffic between cities.

There are other similar corridors with similar issues between the Black Diamond/Enumclaw area and the Auburn/Kent urban area, and in northeast King County between Duvall and the Woodinville/Kirkland/Redmond urban area.

Transportation Actions (T-Actions)

pp. 121-122:
Regional Actions
T-Action-1 — “Regional Transportation Plan: PSRC will update the Regional Transportation Plan (RTP) to be consistent with federal and state requirements and the goals and policies of VISION 2050. The RTP will incorporate the Regional Growth Strategy and plan for a sustainable multimodal transportation system for 2050.”

We consider this Action as important to ensuring we have as a sustainable system as possible. We will continue to participate in review and comment of such plans.

p. 122:
Local Action
T-Action-6 — “VISION 2050 Implementation: Counties and cities, with guidance and assistance from PSRC, will update local plans to support implementation of the Regional Transportation Plan and address the Regional Growth Strategy.”

We often review and comment on various city comprehensive plan updates, both annual and major. Unfortunately, we see little to no coordination of such plans among cities. It appears we must rely only on the PSRC certification process of such plans when it comes to ensuring some regional coordination among cities.
p. 125:

**Goal:** “The region supports development with adequate public facilities and services in a coordinated, efficient, and cost-effective manner that supports local and regional growth planning objectives.”

While we support the Goal, we want to ensure all urban and urban-serving facilities, such as stormwater management facilities, be sited within the Urban Growth Area (per RCW 36.70A.110 (4)), not on less costly lands to acquire in the Rural Area.

p. 126:

**Special Purpose Districts**

“Washington state law allows special purpose districts to be created for a variety of services, including sewer, water, drainage, flood control, parks and recreation, fire, libraries, public hospitals, schools, and public transportation. There are more than 330 special purpose districts in the central Puget Sound region. The Growth Management Act requires counties and cities to work together but does not place the same obligation on all special purpose districts.”

This is a very good point and we would support dialogue with State legislators to seek suitable remedies. Special Purpose Districts are not required by the Growth Management Act (GMA) to coordinate their activities, yet such coordination would be a benefit to their customers and could reduce risks of future problems.

**Capital Facility Siting**

p. 127:

“Facilities serving urban populations are more efficient and cost-effective when sited in urban areas, while facilities serving rural populations are more effective when designed at the appropriate scale and located in adjacent towns or communities.”

We could not agree more with “(f)acilities serving urban populations are more efficient and cost-effective when sited in urban areas….” This is a battle we continue to fight.

p. 127:

**School Siting**

“School district boundaries have been long established, and some districts that were historically rural have become major suburban education providers. As a result,
there are some districts that provide school services to both urban and rural populations, and some that own sites outside the urban growth area intended for future schools. Developing urban-serving schools on these outlying locations often requires expensive programs to transport students and encourages students to drive or be driven to schools.

Schools should be encouraged to become the cornerstones of their communities by locating urban-serving schools in urban settings and designing facilities to better integrate with their urban neighborhoods. Collaborative planning between school districts and local governments on siting urban schools has been successful in identifying locations, problem-solving development challenges, and encouraging walking and biking to schools.

In 2017, the Washington State Legislature amended the Growth Management Act to allow, under certain circumstances, schools serving urban and rural populations outside the urban growth area if certain conditions are met.”

Several of our members served on King County’s School Siting Task Force in 2011-2012. Up to that time too often School Districts were siting major facilities in the Rural Area because land costs were much lower, but those same facilities were further away from most of the students, teachers, and support staff who would use those facilities, plus rural roads often were inadequate. Our Task Force worked collaboratively and developed long-term solutions agreed to by all participants. We believe our Task Force’s solutions helped form the bases for the conditions enumerated in the 2017 State Legislature’s actions.

Public Services Policies (MPP-PS’s)

pp. 128-131:

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.”

MPP-PS-8 — “Develop conservation measures to reduce solid waste and increase recycling.”

MPP-PS-26 — “Site schools, institutions, and other community facilities that primarily serve urban populations within the urban growth area in locations where they will promote the local desired growth plans, except as provided for by RCW 36.70A.211.”

MPP-PS-27 — “Locate schools, institutions, and other community facilities serving rural residents in neighboring cities and towns and design these facilities in keeping with the size and scale of the local community, except as provided for by RCW 36.70A.211.”

MPP-PS-29 — “Do not locate regional capital facilities outside the urban growth area unless it is demonstrated that a non-urban site is the most appropriate location for such a facility.”

We consider the five above listed Public Services policies (of a total of twenty-nine—all of which are pertinent and needed) as critical, as the region grows, to ensure the integrity of the Rural Area, as we have enumerated herein.
We support proper siting of Public Services facilities such that urban and urban-serving facilities be sited within the Urban Growth Area, which we believe is in accordance with the goals in VISION 2050.
VISION 2050 Draft Plan

Implementation
Draft VISION 2050: Implementation
(pp. 133-138)

To achieve the VISION 2050 goals, PSRC might have to seek additional tools from the State beyond control of certain Federal Highway monies. These could include use of certain targeted incentives across the board for housing, parks, etc.

In addition, PSRC could seek from the State more regional authority to assess transportation concurrency and growth management planning from a regional perspective, otherwise there will continue to be no coherent way to incentivize a truly regional approach to achieving the VISION 2050 goals.

Policy and Plan Review

p. 134:
Countywide Planning Policies
“Countywide planning policies provide a county-level framework for guiding local planning. Countywide planning policies are adopted by each county and its cities through countywide planning councils and local ratification processes. PSRC, as the Regional Transportation Planning Organization, must certify the countywide planning policies for consistency with the Regional Transportation Plan and regional guidelines and principles (RCW 47.80). The Regional Collaboration chapter calls for countywide planning policies to be updated to reflect revised multicounty planning policies by December 31, 2021.

The countywide planning policies generally contain local growth targets that implement the Regional Growth Strategy. By allocating county and regional growth to groups of regional geographies, the Regional Growth Strategy preserves flexibility for counties to work with their cities as they develop specific, jurisdiction-level growth targets that take into account local conditions, such as development capacity and phased opening of high-capacity transit. PSRC provides data and technical assistance to countywide planning organizations to assist in the development of growth targets that are consistent with the Regional Growth Strategy.”

Growth Targets have been an important feature of implementing the GMA on the ground. However, we have seen many instances where cities have exceeded their Growth Targets (and in some cases plan to grossly exceed them). There appears to be no legal mechanism to rein in such cities and such practices.

This especially is a problem along the urban fringe where there is insufficient infrastructure to meet the needs of all those new residents and their commuting behaviors. Yes, we understand that the PSRC can “conditionally approve” such city comprehensive plans, but that appears to be mere “slap on the wrist,” or worse yet, simply re-categorize the city to the next size level in population (essentially, “moving the goal posts”). We believe the State must provide some new tools to address this very real problem and the domino effect it has throughout the region.
Local Comprehensive Plans

“Every county, city, and town in the region maintains a comprehensive plan to shape the future of their community. PSRC works with local governments and agencies to ensure that planning is coordinated and meets regional and state requirements consistent with PSRC’s adopted Policy and Plan Review Process. 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

PSRC’s Plan Review Manual provides details on the plan review and certification process, including guidance and checklists for aligning plans and policies with VISION 2050 and Growth Management Act requirements.

Local comprehensive plans were reviewed under VISION 2040 provisions for the first time in 2014-2016. Strengths and challenges from that review were assessed and documented in a report called Taking Stock 2016. Based on feedback from the Taking Stock assessment, PSRC will update the plan review process and Plan Review Manual to make review of future local plan updates more clear, predictable, and efficient. Earlier communication on expectations for updates and reviews will be key and improving the process for board review of plans will help to make it more predictable.

As jurisdictions develop their comprehensive plan updates, PSRC provides review and feedback in three phases: pre-update consultation, early review of draft plan elements, and review of adopted plans for certification. PSRC will coordinate with countywide groups and hold workshops on the plan review process. Pre-update consultation between jurisdictions and PSRC will help identify new provisions in VISION 2050 and the Growth Management Act. Consistent with the updated Plan Review Manual, the local plan certification checklist will provide clarity on expectations for plan certification.”

We reviewed “Taking Stock 2016” which assessed the “strengths and challenges” of recent PSRC reviews of “local comprehensive plans” “under VISION 2040 provisions.” The comments were sobering and show how difficult such a process is to execute. However, it also shows how important the local comprehensive plan review process is to the region. Consequently, we look forward to the update to the September 2010 Plan Review Manual (last Updated in June 2014).

Regional Transportation Planning and Project Funding

“The Regional Transportation Plan, the region’s federally required metropolitan transportation plan, is the functional plan implementing VISION 2050 transportation provisions. The Regional Transportation Plan describes how the region intends to provide transportation choices to support expected growth and identifies investments the region is making to improve transit, highway, rail, ferry, bicycle, and pedestrian systems to support the safe and efficient movement of people and goods. A state and federally required air quality conformity analysis is conducted on the plan, as well as a broader emissions analysis that includes greenhouse gas emissions. Federal transportation planning regulations require metropolitan transportation
VISION 2050 Draft Plan

plans to be updated every four years. The next update of PSRC’s Regional Transportation Plan is scheduled for adoption in 2022. It will use the land use and growth assumptions described in in VISION 2050’s Regional Growth Strategy.

The Regional Transportation Plan includes a list of regionally significant transportation projects that implement VISION 2050. To be considered for funding, projects must be in or consistent with the Regional Transportation Plan and included in the Regional Transportation Improvement Program, which is a four-year snapshot of current transportation projects underway in the region. These projects are funded with federal, state, and local funds, including the most recent federal grants awarded through PSRC.

In addition to the list of projects, the Regional Transportation Improvement Program also contains the following information:

- The adopted policy framework for the distribution of PSRC's federal funds, which is based on the multicounty planning policies.
- A description of the project selection process for these funds.
- A discussion of the interagency coordination and the public review process.
- The findings of the air quality conformity analysis.

Each project in the Transportation Improvement Program undergoes a comprehensive review by PSRC staff to ensure it meets certain requirements.”

We participated in the development of the Regional Transportation Plan (RTP) by conducting an in-depth review, and preparing and submitting a coherent set of detailed comments during its final formulation process. We plan to continue to do so with future RTP updates. We consider the RTP to be a critical asset in helping to keep the region's people and freight moving, as well as striving to meet the region's overall growth-management objectives. We also recognize the importance of the Regional Transportation Improvement Program and keeping it updated to reflect the region's most-pressing transportation needs.

Regional Economic Development Planning

p. 137:

“The Regional Economic Strategy implements the economic development provisions in VISION 2050. It describes the region's approach to sustained economic vitality and global competitiveness. The Central Puget Sound Economic Development District Board develops the Regional Economic Strategy and identifies actions to implement it. These actions focus on building regional capacity, identifying emerging opportunities, providing data analysis, and collaborating on events that bring together regional economic development interests. Funding for implementation efforts come from a variety of sources such as federal and state grants, local funding, and support from regional partners. The U.S. Economic Development Administration requires the Regional Economic Strategy to be updated every five years.”

In May 2017 we submitted detailed comments on the draft Regional Economic Strategy (RES). We specifically targeted comments on RES Strategies and Actions that both directly or indirectly impact the Rural Area:
VISION 2050 Draft Plan

1. *Preserve rural lands and rural character to keep the Rural Area Rural* by ensuring urban and urban-serving facilities remain in urban areas;
2. *Sustain and help grow our local rural economies by protecting farmlands, forests, and open space*, while encouraging recreational use in rural areas that is compatible with environmental interests and local culture;
3. *Find equitable mechanisms to maintain rural transportation infrastructure* that is increasingly used by urban commuters to travel to other urban areas; and
4. *Ensure the availability of inexpensive broadband access within rural areas* to facilitate telecommuting, distance learning, and small businesses that depend upon high-speed internet access.
“Washington's Growth Management Act provides the framework for planning at all levels in the state, including identifying and protecting critical environmental areas, developing multicounty and countywide planning policies, and crafting local comprehensive plans (RCW 36.70A). Multicounty planning policies (and the related countywide planning policies) provide a common framework for local and regional planning in the central Puget Sound region. At a minimum, multicounty planning policies are to address the urban growth area, contiguous and orderly development, siting capital facilities, transportation, housing, joint planning, and economic development. The multicounty planning policies are included in VISION 2050.

Additional guidance is provided by the portion of state law that authorizes and directs the planning efforts and responsibilities of Regional Transportation Planning Organizations (RCW 47.80). PSRC is designated as the Regional Transportation Planning Organization for King, Kitsap, Pierce, and Snohomish counties. This legislation related to the Growth Management Act calls for Regional Transportation Planning Organizations to develop and carry out a program to certify the transportation-related provisions in local comprehensive plans. It mandates the development of regional guidelines and principles to guide both regional and local transportation planning. These guidelines and principles are to address, at a minimum, the following factors: concentration of economic activity, residential density, urban design that supports high-capacity transit, freight transportation and port access, development patterns that promote pedestrian and nonmotorized transportation, circulation systems, transportation demand management, joint and mixed-use developments, railroad right-of-way corridors, and intermodal connections. Multicounty planning policies serve as PSRC's regional guidelines and principles under RCW 47.80.

PSRC's certification of transportation-related provisions in local comprehensive plans includes determining conformity with state requirements for transportation planning in local plans, consistency with adopted regional guidelines and principles, and consistency with the Regional Transportation Plan (RCW 36.70A.070 and 47.80.026). The legislation also addresses the certification of the countywide planning policies. 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.”

We consider “PSRC’s certification of transportation-related provisions in local comprehensive plans” both an important function and a most difficult responsibility. Ensuring consistency with “state requirements,” “adopted regional guidelines and principles,” and the “RTP” is paramount to ensuring a vibrant region now and into the future. However, we remain concerned that PSRC must be given sufficient authority by the State to ensure there is sufficient “teeth” in the review process and followthrough.
Draft VISION 2050 | Kitsap Public Health District Staff Comments

Integrating Health in Vision 2050
Kitsap Public Health is pleased to see health and equity recognized as desirable outcomes of Vision 2050 and we appreciate that they are mentioned throughout the plan. Below are some thoughts as to the potential health equity impacts specifically related to Kitsap County residents.

Housing Policies and Local Actions—Policies and Local Actions listed in the Housing chapter would have a great impact on rezoning communities to allow for more affordable housing options. Very few affordable multifamily housing opportunities exist in Kitsap county, especially surrounding the regional growth centers. While many municipalities in Kitsap are moving to pass ordinances that rezone for multifamily housing, this process has been slow. Guidance from PSRC could prove to be useful in this process. A majority of Kitsap County land will be untouched due to a rural area designation, as depicted in Figure 13. We expect to see residents move out of these rural areas closer to jobs in transit-oriented areas. Affordable housing outside of rural areas will be crucial to support the growing disparities in our county.

Formalizing Municipalities—Under the direction of this plan, funding allocation relies heavily on unincorporated areas to move to a formal municipal structure. Many cities in Kitsap County are in unincorporated areas, making attainment of some regional and State funding impossible. We support policies in VISION 2050 that promote annexation and incorporation of cities. These policies will allow for more transportation projects in Kitsap’s regions of highest social inequity.

Connecting Sound Transit and Kitsap Transit—VISION 2050 relies heavily on investments made by Sound Transit, but Kitsap Transit (and Kitsap County residents) have not made the same level of investment in transportation projects. There is currently very low connection between Kitsap Transit and Sound Transit, except via ferry. This makes commute to Tacoma from anywhere in Kitsap County challenging without a personal vehicle. Even within Kitsap County, access to jobs, housing, and services is limited without a personal vehicle. PSRC could support policies that promote integration of Kitsap Transit and Sound Transit, as well as policies that promote better transit connectedness within the County.

We look forward to working with PSRC to create more tangible regional and local actions from the policies listed, proving as a useful toolkit for local municipalities and jurisdictions looking to partake in PSRC projects. Do not hesitate to reach out for further clarification on the above listed points to megan.moore@kitsappublichealth.org. Thank you for your diligence in this endeavor!
Dale Bright, Laborers Local 242, provided verbal comments at the September 5 Growth Management Policy Board Public Hearing. Mr. Bright thanks PSRC for giving a presentation on VISION 2050 to his group’s members. He discussed apprenticeship utilization and noted that many jurisdictions have adopted these requirements, noting some have created community workforce agreements. He stated that these programs turn public works projects into an extension of the state education system and provide job training for community members. He shared his personal experience working in the trades industry. Mr. Bright requested apprenticeship utilization be added as part of PSRC’s scoring requirements.
Share Your Thoughts!

Note: You can also provide comments online at https://www.psrc.org/draft-vision-2050-plan-comment-form

Open House - Snohomish County
July 29, 2019 3-5

Open Space Small Group

- Hold tight to USA boundaries / Use TDAs for ag buffer
- Drive curation for full w/ CORE, ethics
- Take pressure off underpowered USA areas
- Use trees, pathways for park, ethics, landscape to highlight unique qualities
- Focus housing varieties around educational (cokes, school choices) -- use trails to lead to those open fields

Create a contiguous public access around Puget Sound - designate emergency recreation zones

Name: Joan Smith
League of Women Voters Snohomish County

Organization (If Applicable): LWVSC Zip Code: 98206

Email or Mailing Address: joan.a.smith@gmail.com

☐ Yes! Add me to the VISION 2050 email list

How did you hear about this open house?

☑ Email/newsletter
☐ Social media
☐ Newspaper/news media
☑ A friend or colleague

☐ An event
☐ Other (please specify) LWVSC Natural Resources Committee

Puget Sound Regional Council
Share Your Thoughts!

Note: You can also provide comments online at https://www.psrc.org/draft-vision-2050-plan-comment-form

- Parkways, access to parks open space throughout cities - people need nature escapes close to home
- Improve access to transit through neighborhoods
- Enable children to walk safely to schools - all ages!
- Encourage green building standards, buying local, products when possible
- Encourage Farmer's Markets
- Set high targets for tree canopy preservation and planting
- Add "climate change" aid address in all EMA targets and Comprehensive Plans

Name: Joan Smith

Organization (If Applicable): League of Women Voters
Zip Code: 98026
County: Snohomish
Email or Mailing Address: joana.smith@gmail.com

☐ Yes! Add me to the VISION 2050 email list

How did you hear about this open house?

☐ Email/newsletter
☐ Social media
☐ Newspaper/news media
☐ A friend or colleague
☐ An event
☐ Other (please specify) LWRSCA Natural Resources Committee
September 16, 2019

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

RE: Vision 2050 Draft Plan Comment

Dear Mr. Inghram,

Thank you for the opportunity to comment on the Vision 2050 Draft Plan. The League of Women Voters of Washington shares PSRC’s goal of moving toward a sustainable future through the wise use of existing resources and planned transit improvements. Many of the policies contained in the draft Plan reflect the League’s positions, and we acknowledge and support the work PSRC has done in preparing this Plan. Data has become an essential lubricant to understanding and dealing with the complex issues we face in our community today and PSRC is an important provider of critical data. PSRC and its boards also provide the venue for local and regional governments to discuss the strategies to address these issues. The Plan lays out fairly clearly what the strategies are, and how they will be implemented. It includes a goal of 65% of the region’s population growth and 75% of the region’s employment growth to be located within walking distance of high-capacity transit. It calls for a “balanced distribution of affordable housing choices and jobs” as critical to its success.

However, many of the issues identified in the Plan are not directly under the PSRC’s purview, and action by other groups will be needed to meet the Plan’s stated goals. For example, PSRC does not provide direct funding for housing although providing affordable housing is a priority for the Plan. Through their review process, PSRC can work to see that county and city plans include provision for a range of housing options, and they are proposing to develop a Regional Housing Strategy. But housing needs will need attention at the state or national level if they are going to be effectively addressed. PSRC’s data on housing estimates that 60% of households by 2050 will have an income that will require some sort of public intervention to meet their housing needs.
The Plan includes a section on the Economy but it is frustratingly vague on how it will be applied to marry job location to affordable housing. The section on Transportation makes clear that in actuality more people are commuting farther and longer to get to their jobs, and recent information on housing prices indicates that housing prices are increasing at a faster and higher rate outside King County because they are still relatively more affordable. Yet the Economy section is more focused on efficient flow of goods and services than people.

If the goal of affordable housing near to jobs is not met, then people must rely more on transportation – either roads or transit. Adequate funding for both is important to avoid even more congestion and impact to the environment through air pollution and carbon emissions. But the Plan proposes increased reliance on user fees and roadway pricing which can result in a double whammy to working people who can’t afford to live in the city and now have to pay even more to get to their job. This will increase inequity rather than reduce it. Already ferry users must pay a surcharge designed to help cover the capital costs as well as the operational costs of the ferry.

In summary, we applaud the work that PSRC has done to prepare this plan. It sets out an aspirational vision of the future and what we can do to move toward that vision. We believe that the members of PSRC are in support of that vision and will take steps needed to achieve it. This will be a positive progress, and it will be necessary for PSRC to work proactively with other partners including the State Legislature if some of the issues described so clearly in this Plan are to be addressed.

Lunell Haught, President  Martha Burke, LWVWA Representative
League of Women Voters of Washington  PSRC Transportation Policy Board
September 16, 2019

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

RE: VISION 2050 Comments on Preferred Alternative

Dear Mr. Inghram:

On behalf of the nearly 2,800 member companies of the Master Builders Association of King and Snohomish Counties (MBAKS), we appreciate the opportunity to provide comments on the PSRC’s Draft VISION 2050 “A Plan for the Central Puget Sound Region.” Please consider our comments and include them into the VISION 2050 project record.

MBAKS members are the people who work to provide housing to the region every day. They follow the many city and county development regulations that are a result of the Multi-County Planning Policies, Countywide Planning Policies, and local comprehensive Land Use Plans. Our members are keenly aware and interested in the VISION 2050 draft plan and want to work with PSRC staff and board members throughout the review and approval process.

The draft vision now circulating for comment is the result of months of research, meetings, writing and editing, by staff and GMPB board members. We appreciate the hours of work reflected in this draft and thank the staff and board members for their focus and dedication to the task.

Our comments focus on three areas:

1. Help from PSRC within VISION 2050 to articulate the urgent need for much more housing (and increased density) along transit lines;
2. Ensuring there is flexibility for local jurisdictions to adjust growth targets that are different than the share of growth allocated under VISION, when projected growth is anticipated to be different than VISION’s allocation; and
3. Suggested edits/comments related to the Multi-county Planning Policies (MPPs)

VISION 2050 sets an aggressive goal of accommodating 65% of the increased population (PSRC estimates 1.8 million additional people in the four-county region by 2050) within walking distance (or near) transit lines. Sixty-five percent would be about 1.2 million people living near transit. We support this goal; however, we are concerned that it will not be feasible unless local zoning, development regulations, and permit processes significantly change to accommodate the growth we are expecting. The premise that 65% of new growth will be absorbed near transit lines is a fundamental assumption of VISION 2050. Yet, there is no mechanism to make certain proper zoning and regulations will be adopted to enable this growth near transit. If growth near transit continues to be restricted, the result is likely to be growth farther from job centers, longer commutes, worsening traffic, and increased pressure to adjust urban growth boundaries.

PSRC and its policy boards are in a unique position to serve as a regional convener to help elected officials and residents understand the need to accommodate many more people much closer to transit. Without acceptance and openness to radical change, VISION 2050 will not succeed. Current zoning, development regulations, and permit processes do not support or encourage the amount of housing we will need to reach
our goal. We urge you to develop a robust plan to help enable this so that VISION’s core assumption can be realized.

While planning for most of the growth near transit makes sense, it is important to recognize that the GMA requires local governments to plan for a variety of housing types. MBAKS commissioned a study earlier this year to review residential zoning regulations in King, Snohomish, and Pierce counties. We wanted to know which jurisdictions have minimum residential densities that fall below four dwelling units per acre, which is the planning standard for being considered “urban” within urban growth areas. Note the number of units per acre would need to be much higher than four to accommodate 65% of the new population, 1.2 million more people.

The results of the study were staggering. Some examples:

- 58% of the jurisdictions in the three-county region have zoning that limits residential density to less than four dwelling units per acre in some parts of the city.
- In King County, 74% of jurisdictions allow less than four units per acre in at least one residential zone.

We support VISION’s housing goals and encourage you to use the draft document to reinforce the mandatory housing elements in the Growth Management Act (GMA). RCW 36.70A.070 (1) says: “The land use element shall include (underline added) population densities, building intensities, and estimates of future population growth.” The housing mandatory element in RCW 36.70A.070 (2) provides greater specificity to local governments as they plan for growth. It states in part: A housing element ensuring the vitality and character of established residential neighborhoods that: (a) Includes an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth; (b) includes a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including single-family residences; (c) identifies sufficient land for housing, including, but not limited to, government-assisted housing, housing for low-income families, manufactured housing, multifamily housing, and group homes and foster care facilities; and (d) makes adequate provisions for existing and projected needs of all economic segments of the community.

As the preferred alternative emphasizes concentrating growth near transit, it is critical that VISION aligns with GMA requirements, which mandate planning for a variety of housing types. In addition, jurisdictions should not be permitted to push certain housing types to the urban growth area (UGA) fringes far from job centers. The current draft of VISION needs language to highlight these important points.

Regarding growth target flexibility, VISION should recognize that growth expectations for some regional geographies outside King County may be unrealistic and therefore flexibility will be needed. In the draft VISION “Regional Growth Strategy” chapter, under “Guidance for Aligning Growth Targets” (page 43) it says it will recognize “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.”

The foregoing statement is important recognition that some cities, such as Tacoma and Everett have not grown as anticipated in VISION 2040. In VISION 2050, growth expectations for these jurisdictions (and others) may not be realistic for the planning period. We appreciate that VISION does not encourage cities and counties to adopt growth targets where it is demonstrated that those growth targets are unrealistic (too high or too low). If unrealistic growth targets are adopted simply to be consistent with VISION, service providers, such as schools and utilities, that rely on accurate growth targets in their planning will likely be negatively impacted. PSRC’s work here is critical for many reasons, one of which is that significant infrastructure planning follows.
We anticipate that if all growth in the next 30+ years occurs within existing UGAs (limited or no UGA expansions), some cities and unincorporated UGAs will by default take more growth than VISION anticipates. While many jurisdictions support VISION policies, they also face neighborhood opposition to growth that make it difficult—even impossible—to implement policies that emphasize increased housing near transit. We urge PSRC to take action within VISION 2050 to address this. Our region depends upon it.

We also want to recognize Figure 6—Population Growth 2017-50, Draft Preferred Alternative (p. 30). Recognition of unincorporated growth in rural Snohomish County of 6 percent (approximately 25,000 residents over 33 years) is more accurate and consistent with growth that is likely to occur based upon already vested lots. Thank you for making this change.

MBAKS appreciates the time and effort that went into preparing VISION 2050 and allowing us the opportunity to comment. Attached you will find specific Multicounty Planning Policy (MPP) comments and suggestions for your consideration. Please consider us a resource on homebuilding issues and contact us any time. We look forward to working with PSRC staff and leadership as VISION 2050 progresses.

Sincerely,

[Signature]

Master Builders Association of King and Snohomish Counties
Kat Sims
Executive Director

cc: Josh Brown, Executive Director, Puget Sound Regional Council
Ryan Mello, Chair, PSRC Growth Management Policy Board
Multicounty Planning Policy (MPP) suggested new policies and edits.

We appreciate the opportunity to comment on the VISION 2050 Multicounty Planning Policies (MPPs). While many of the policies are designed to assist the four-county region work towards a common planning framework, we would like to recommend edits on several policies that could better align with the goal of concentrating future growth (65% of the estimated 1.8 million additional people expected to live here by 2050) near transit.

VISION 2050 states that “The multicounty planning policies provide overall guidance and direction for planning processes and decision-making at regional and local levels.” However, it does not distinguish between policies written to assist regional decision making and those focused at the local level. VISION says “…the full body of multicounty policies is to be considered in decision-making for various programs, projects, and planning processes”. It would be helpful for local jurisdictions if PSRC could distinguish between policies that local governments are to consider from those directed towards regional efforts.

Recommend NEW POLICY MPP-RC-X: To emphasize regional collaboration on the housing mandatory element requirements in RCW 36.70A.070. This new policy could direct the four counties to collect regional data and outline how to work together to incorporate all the housing types that local governments are required to include in their land use plans, including “…single-family residences…” and identification of “…sufficient land for housing, including, but not limited to, government-assisted housing, housing for low-income families, manufactured housing, multifamily housing, and group homes and foster care facilities; and (d) makes adequate provisions for existing and projected needs of all economic segments of the community.”

Recommend NEW POLICY MPP-RC-X For the four counties to collaborate on ways to help communities and neighbors understand and support the land use changes needed to accommodate a majority of 1.8 million more people near transit.

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

**Comment:** Modify this policy to reflect the importance of development regulations, which implement policies.

MPP-RGS-3 Provide flexibility in establishing and modifying countywide growth targets, provided growth targets support the Regional Growth Strategy. Targets should demonstrate how cities and counties are working towards the outcomes and objectives of the RGS. In some cases, countywide growth targets may not fully align with the precise shares in the RGS.

**Comment:** Modify to reflect the text from page 43 of VISION 2050 draft alternative. Reinforces existing policy.

MPP-RGS-4 Accommodate the region's growth first and foremost in the urban growth area. Ensure that Plan for development in rural areas is consistent with the regional vision.

**Comment:** Remove “ensure that,” which could be construed to mean that counties are required to enact building moratoriums and down zone rural areas in order to control growth on vested lots within these areas. The revised phrasing clarifies counties should plan for growth consistent with Vision 2050 but are not required to take away the ability to develop lots that have already been created or create new lots based upon current rural zoning.

MPP-RGS-5 Ensure Plan for long-term stability and sustainability of the urban growth area consistent with the regional vision. Stability of the urban growth area will be based upon several factors including the ability of cities and counties to accommodate their adopted growth targets within the planning period.
Comment: Modify this to emphasize that for UGA boundaries to remain in place, which VISION 2050 assumes is an important policy goal, the region must find places for 1.8 million additional people in the next three decades within the existing urban growth area. Cities and counties will need to support land use decisions that encourage urban growth, reduce permit processes and timelines so housing can get to market faster, and implement housing element requirements of the GMA to the greatest extent possible.

In some cases, VISION acknowledges that regional geographies (such as Everett) may have an overly optimistic share of growth. If the growth does not occur in Everett, for example, where will the growth go and will it be planned for in another jurisdiction?

In the context of this policy, it is not clear what “sustainability” means. Consider removing it or describe what it means.

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 and the housing mandatory element requirements of the Growth Management Act (GMA).

Comment: Support and add emphasis to this policy. To meet VISION goals, all urban land must be used efficiently to each of the housing types required by the GMA.

MPP-RGS-7 Attract Work towards 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 plan for development near high-capacity transit to achieve the regional goal.

Comment: VISION uses the term “work towards” and recognizes that attracting 65% of the growth around high capacity transit is a goal, but that it may be difficult to reach during the planning period. Suggest “plan for” replace “focus” since this is a planning document.

MPP-RGS-11 Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high-capacity transit.

Comment: Agree that growth should be concentrated near high capacity transit, however, there is also a need to increase capacity outside of these areas to ensure housing mandatory element requirements of the GMA are met. Increasing housing near transit will help meet the goal of providing multifamily housing, yet other types of housing are required as well. Why would we “avoid” rezoning single family neighborhoods to allow 12 units per acre rather than 24 units per acre?

NEW POLICY RGS-Action-X New policy to address ways the region can help communities understand and support increased growth within the UGAs. VISION’s success is dependent on cities and counties welcoming new growth.

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.

Comment: State and federal standards for environmental planning are already set. Does this policy add a new requirement? What is meant by “especially scientific information”?

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: GMA already requires open space corridors and critical area protection. Is this policy asking for protections beyond what our laws already require? How does this align with VISION’s goal to concentrate 1.8 million additional people into existing UGAs and 65% of that growth near transit?

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 sufficient public spaces.

Comment: This policy needs to be balanced with the need for more housing in compact urban communities near transit. Many development regulations already require features that make development costly, removes housing units, and sometimes makes it too expensive to build housing in certain areas.

MPP-DP-8 Support urban design, historic preservation, and arts to enhance quality of life, improve the natural and human-made environments, promote health and well-being, contribute to a prosperous economy, and increase the region’s resiliency in adapting to changes or adverse events.

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

Comment: Same as comment on MPP-DP-3

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: This policy appears unnecessary as it restates a portion of the housing mandatory element requirements under RCW 36.70A.070(2) “(d) makes adequate provisions for existing and projected needs of all economic segments of the community.” If retained, it should include the entire section. This comment should also be considered for MPP-H-2.

MPP-H-10 Encourage jurisdictions to review and streamline development standards and regulations to advance their public benefit, provide flexibility, and minimize additional costs to housing.

Comment: Support this and suggest adding urgency in addressing the nexus between predictable, consistent, and timely permit processing and the goals of VISION. As stated by the legislature in 1995 as part of the local project review act (RCW 36.7B.0101):

Since 1995, permit processes and time to permit projects has substantially increased. This impacts the ability to get housing to market within the VISION 2050 planning period. Environmental laws have proliferated and there remains much “...conflict, overlap, and duplication between the various permit and review processes.”

\footnote{RCW 36.7B.010 Findings and declaration. The legislature finds and declares the following: (1) As the number of environmental laws and development regulations has increased for land uses and development, so has the number of required local land use permits, each with its own separate approval process. (2) The increasing number of local and state land use permits and separate environmental review processes required by agencies has generated continuing potential for conflict, overlap, and duplication between the various permit and review processes. (3) This regulatory burden has significantly added to the cost and time needed to obtain local and state land use permits and has made it difficult for the public to know how and when to provide timely comments on land use proposals that require multiple permits and have separate environmental review processes.}
September 16, 2019

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

Dear Mr. Brown,

This letter is in reference to the Vision 2050 Document draft regarding the Puget Sound Region Council’s (PSRC) plan for growth. On behalf of the Master Builders Association of Pierce County (MBA Pierce) and our 650 Association members, thank you for your consideration to these comments.

Introduction

Because our Association is located within Pierce County and our members primarily conduct business here, our comments are rooted in the realities regarding growth that Pierce County, as a whole, is experiencing currently and will be experiencing in the future. MBA Pierce would also like to acknowledge that our members build the homes which the real estate market is currently demanding- that are being desired by homebuyers- which is largely single family homes. In context, we assert that it is important for the PSRC to recognize the products which consumers are pursuing.

The Current Jobs-Housing (Im)balance

The Vision 2050 Document draft seeks to improve the jobs-housing balance throughout the Puget Sound region. MBA Pierce asserts that housing location is paramount to achieving a jobs-housing balance. Encouraging housing production throughout the County’s Urban Growth Area, regardless if it is incorporated or unincorporated, will establish a more equal ratio of jobs to homes in Pierce County, reduce commute times, and encourage access to good paying jobs outside of King County. Subsequently, building housing units will boost the “regional mobility, environmental outcomes, and community development” that the Vision 2050 Document draft is seeking.

Realistic Growth Allocation

In Pierce County, there is bountiful Unincorporated Urban Growth Area (UUGA) that is not claimed by any jurisdiction. It is paramount to acknowledge that UUGA in Pierce County accommodated 40% of the entire growth in the County as a whole between 2000 and 2017. Furthermore, Pierce County’s rural areas accommodated for about 16% of the entire County’s growth during the same timeframe. Therefore, MBA Pierce requests that PSRC allows for the
population growth of 60,000 people in the UUGA and 22,000 people in the rural areas of Pierce County (as the County already has major projects in the pipeline).

1. **Centers and Corridors Project**

Centers and Corridors is a project Pierce County is pursuing seeks to establish high-density communities with employment and transportation options available for residents living within the areas of Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill. All of these areas mentioned are currently UUGA, but the intention to radically rezone these regions will allow for these areas to eventually incorporate as their own jurisdictions or to be incorporated into existing jurisdictions. The Centers and Corridors project is undoubtedly ambitious but has the potential to create several new incorporated areas within the Urban Growth boundaries in due time. The incorporation process would not be immediate and growth would need to occur in the UUGA until these communities are ready to transition.

2. **Pierce County UUGA Pipeline of Projects**

Apart from the Centers and Corridors Project, there are several other planned communities in the pipeline in Pierce County’s UUGA. Among the anticipated projects are the Tehaleh, Lipoma Firs, and Sunrise developments. All three of these developments are being built by our association’s builder members and all three are anticipated to produce nearly 11,000 housing units combined. Smaller development projects, ranging from 100 to 850 units total over 3,000 units collectively. Finally, Pierce County calculates that there are over 3,300 units projected from plats with less than 100 lots. The total amount of anticipated projects in Pierce County’s queue amounts to 17,353 housing units.

**Conclusion**

MBA Pierce hopes that you recognize the significant differences between the needs of King, Snohomish, Pierce, and Kitsap counties and their cities. This includes differences in the housing markets and types of housing needed; anticipated growth allocations; the local economy and jobs; and economic forces that drive growth. Furthermore, we ask that you consider MBA Pierce as a resource for the PSRC on anything concerning home building, attainable housing, and other related issues. We look forward to working with you and thank you for the opportunity to comment on the scope of the Vision 2050 Document Draft.

Always,

Jessie Gamble
Government Affairs Manager
Pilchuck Audubon Society supports the Transit Oriented Center Alternative. It is vital that our communities do not sprawl unnecessarily into our rural areas. Already Snohomish County is behind in keeping up with roads necessary for the increased population, and allowing for more urban growth area expansions is not good urban planning. Snohomish County has to concentrate its planning for growth around the existing planned Transit Urban Centers, and encourage development in these areas and along other already established transit corridors. The Transit Oriented Center Alternative will go the furthest in creating urban communities that people want to live in, will reduce sprawl development into our urban areas, will put less pressure on our resource lands, will help reduce greenhouse gas emissions from more car travel, which already is a huge problem, and save taxpayers money.
Milenko Matanović, Pomegranate Center, provided verbal comments at the September 5 Growth Management Policy Board Public Hearing. Mr. Matanović shared his concern about the disconnect between planning and members of the public. Mr. Matanović suggested PSRC engage the public more creatively to ensure plans are carried out smoothly.
VISION 2050 Comments from PSP

1. **Puget Sound page at the very beginning** – edits to text below

   Puget Sound is the largest marine estuary **by volume** in the United States.

2. **Puget Sound page at the very beginning** – pictures attached

   Two of the photos are available for non-commercial use under the creative commons license. They would need to be credited, and I’ve added their names to the file name.

3. **Green infrastructure in an urban setting** – picture attached

4. **Puget Sound Recovery narrative** (page 53) – edits to text below

   Though beautiful from a distance, Puget Sound is in serious trouble. The region has made progress in restoring the health of Puget Sound, but significant work and challenges remain. With the steep decline of orca and salmon populations, the health of Puget Sound has become a more urgent issue over the last 10 years. These trends, as well as some positive trends for water quality, have been analyzed by the Puget Sound Partnership, the state agency tasked with coordinating Puget Sound recovery. In the Partnership’s 2019 State of the Sound report, many indicators, such as acres of floodplain restoration, are showing improvement, but just as many indicators, such as the abundance of key species, are not. **Efforts must be re-doubled to combat climate change and the effects of a growing population that threaten ecosystems and disproportionately affects vulnerable communities.**

5. **Overall comments regarding culverts**

   We support local, state, and tribal jurisdictions looking to improve or open up salmon habitat by removing or replacing culverts that are currently fish passage barriers, and we support partners that suggest including a policy statement or action in Vision 2050 to work towards culvert removal.

   Possible policy statement or action(?): Ensure that a watershed approach to culvert removal is taken. Work with tribal, federal, state, and local governments to develop, fund, and implement such an approach to ensure the effective and efficient use of funds to restore salmon habitat.

6. **Supportive of actions**

   We support actions En-Action-2 and En-Action-3 and are interested and willing to engage with partners to help carry these out.
VIA EMAIL  
vision2050@psrc.org

September 16, 2019

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

RE:  Comments – Draft Vision 2060

Dear Councilmember Mello:

The King County Component of the Puget Sound School Coalition1 (the “School Coalition”) submits these comments on the draft Vision 2050 document (the “Draft Vision 2050”).2 As required under the Growth Management Act, local and regional planning must plan for provision of the school facilities needed to accommodate 1.8 million new residents to the Puget Sound region by 2050. Growth uniquely affects school districts by increasing student enrollment and related facility needs but reducing the already constrained areas suitable for new school infrastructure. While the Draft Vision 2050 provides a basis for cooperative planning for schools, additional mitigation-centered policies should assure that schools are provided in a cost-effective and coordinated manner to support the region’s planned growth.

The School Coalition appreciates that the Draft Vision 2050 includes a new MPP-PS-25 directing jurisdictions to “[w]ork cooperatively with school districts to plan for school facilities to meet the existing and future community needs consistent with adopted comprehensive plans and growth forecasts[.]” This new MPP reflects a concept adopted currently in the King County countywide planning policies that has worked well for the School Coalition in its initial implementation. However, even in King County, school districts continue to struggle to find land and school siting opportunities. MPP-PS-25 will only be effective if jurisdictions take

---

1 The King County Component of the Coalition includes the Issaquah, Lake Washington, Northshore, Riverview, Snoqualmie Valley, and Tahoma School Districts.
2 These comments build on the School Coalition’s March 19, 2018 comments submitted during the scoping period and April 29, 2019 comments on the Draft Supplemental Environmental Impact Statement.
focused actions to consider proactive and innovative site planning, implement changes to zoning and design standards to facilitate school siting, and hold new development to adequate school mitigation strategies.

While the Coalition appreciates the direction in MPP-PS-25, the PSRC should clarify the language in draft MPP-PS-25 to avoid suggesting that a city or county dictates the design of school facilities. Instead, the policy should recognize that locally elected boards of directors are responsible for school design and siting in order to provide the required education program and the school infrastructure needed to support the city or county’s permitting decisions. In addition, MPP-PS-25 should be amended to recognize that, given both limited funding for new school construction (and for operations therein) and few remaining school siting opportunities, it is simply impossible for all schools to be walkable for all students. We do not think that the draft intends this dictate, but it is the practical effect of the policy as written. In addition, the draft inserts a subjective term of “safe, walkable access” that is undefined and subject to interpretation. To address these concerns, the School Coalition suggests the following revision to MPP-PS-25:

MPP-PS-25 Work cooperatively with school districts to plan for school facilities to meet the existing and future community needs consistent with adopted comprehensive plans and growth forecasts, including assisting, through planning and permitting tools, the school district’s ability to siting and designing schools to support safe, walkable access and best serve their communities and, where possible, to facilitate walkable access for those students living nearby.

Draft Vision 2050 presents an opportunity to the PSRC to identify a framework for additional meaningful mitigation of growth-related school impacts through forward-planning, innovative opportunities, and additional funding. To this end, the Coalition suggests the following:

- In addition to MPP-PS-25, Vision 2050 should add or revise MPPs to advance proactive planning and consideration of innovative opportunities for siting schools:
  - Shared Use Opportunities: At page 127, in discussing capital facility siting, the Draft recognizes that shared use of public property, through joint siting, could serve as a cost reducing mitigation measure for growth. Jurisdictions should be encouraged, through the addition of an MPP that complements MPP-DP-9, to plan for shared use concepts, even before there is a need for a school, in order to prioritize efficient and cost-effective use of public property. An example of such planning could include the potential for siting a school facility within a public park or civic campus with shared opportunities for use of both green space and building areas. Other opportunities could include building floors for school classrooms over a city or county facilities, such as libraries or community centers.
  - Use of Surplus Public Land for Schools: Similarly, the Draft does not propose incentivizing or prioritizing school district purchase of surplus public lands.

---

3 “Design public buildings and spaces that contribute to a sense of community and a sense of place.”
While MPP-DP-4 proposes that jurisdictions transform such lands to higher density, mixed use areas to complement the development of centers, the policy language should recognize the value of reserving surplus public land for public infrastructure, including schools, needed to serve the growth.

- **Create Opportunities for School Sites:** Draft MPP-DP-10 should include school facilities in the direction to jurisdictions to “[i]dentify and create opportunities to develop parks, civic places and public places, especially in or adjacent to centers.” Again, jurisdictions should prioritize locating viable school sites near areas where the jurisdiction is directing significant growth. Many planning jurisdictions have historically overlooked coordinating the location of schools with planned growth, resulting in overcrowded schools or school capacity located far from a student’s home.

- **Consider Regulatory Assistance:** Draft MPP-DP-46, directing flexibility in development standards and regulations for residential and commercial development, should also specify public infrastructure development. Flexible standards such as allowing for increased height, greater lot coverage, and reduced parking and vehicle staging requirements are critical for school site development given limited siting opportunities and constrained availability of urban land.

- As with all services and facilities necessary to meet the regional growth strategy, the PSRC must prioritize new mechanisms for funding school facilities as a part of the regional strategy. At a minimum, the Regional Collaboration MPPs should recognize the need for regional and local action for school infrastructure funding.

The above strategies, if implemented as a part of Vision 2050, would support the stated narrative that “innovative practices such as joint siting and sharing of facilities that provide multiple benefits (such as playgrounds shared by schools and the public, stormwater parks, and collocated services) can reduce costs” and also address the fact that infrastructure providers “are consistently challenged to find the revenues necessary to . . . fund and develop new facilities to serve growth.” Draft, at 17, 127. With these strategies, the region is better positioned to meet the PSRC’s stated vision that, by 2050, “[p]ublic facilities and services support . . . growth in a coordinated, efficient, and cost-effective manner.” Draft, at 1.

We appreciate the opportunity to submit these comments and look forward to continued participation in the Vision 2050 process.

Sincerely,

PACIFICA LAW GROUP LLP

Denise L. Stiffarm

cc: Members, Puget Sound School Coalition – King County Component
Save Black Diamond
09/16/2019

Comments on Draft Vision 2050

To:  Puget Sound Regional Council

Date:  September 16, 2019

From:  Save Black Diamond

Save Black Diamond is a network of individuals in Black Diamond and around the Puget Sound Region who are concerned about the negative effects of replacing forests at the foothills edge of the Urban Growth Area with a massive land development in Black Diamond.  Such development works against the goals of Vision 2050.  We support protecting natural areas, lakes, and streams; schools that are not over-crowded; prevention of an increase in traffic and commute times; requiring growth to pay for growth; and public transparency and input.  Over 600 people in the Black Diamond area have signed our petition in support of these goals.

The Goals of Vision 2050 Need Additional Support for Suburbs

GUIDANCE.  According to draft Vision 2050, “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” (page 59).

COMMENT:  PSRC guidance and assistance is needed, but the above quote demonstrates a problem with draft Vision 2050.  What kind of guidance and assistance should small cities and towns and rural areas expect?  In these areas, growth is intentionally at a low or zero rate.

In particular, “edge” cities – those farthest from metropolitan areas and nearest to the rural or resource lands – should not exceed growth targets.  This is because the cost of building out needed infrastructure practically from scratch to transform a rural town into a dense city is a waste of resources and taxpayer dollars.

We support draft Policy MPP-RGS-11 to avoid increasing development capacity in areas not well-served by transit.  To ensure implementation of this policy and Vision 2050 goals, other policies need to be improved.

For example, policy RGS-Action-4 on page 62.  This policy supports infrastructure investments and economic development to align with Vision 2050.  Many local planners and officials can easily understand how those investments are growth-oriented in metropolitan areas.  But what investments and economic development would serve existing small communities without encouraging sprawl and too much growth in those small cities?
Local Action RGS-Action-4 should be amended, or another action added, to clarify that while cities must plan to accommodate growth targets, cities and towns with less than 10% of expected growth (those cities not in transit areas) should explicitly plan not to exceed their growth targets.

LOCAL SUPPORT OF VISION. “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.” (Vision 2050, page 59).

COMMENT: If our region’s population does increase by 1.8 million, the “metropolitan” cities must absorb at least their minimum growth targets as drafted in Vision 2050. Otherwise we almost certainly won’t meet the Vision goals, particularly natural environment protection, mobility /connectivity, and efficient and cost-effective public facilities. The Vision would probably work better if the metropolitan cities exceed their “Vision” percentage of growth, provided they do so while maintaining quality of life and services for residents. This would take pressure off the “edge” cities and rural areas so they do not experience an increase in housing demand.

In contrast to metropolitan cities and “growth centers,” smaller cities and towns should be discouraged from exceeding their Vision growth targets. While the state Growth Management Act mandates small cities to plan for their determined “share” of growth, if small cities plan for growth in excess of the target, this does not support the Regional Growth Strategy over the long-term. But many cities have latched on to the idea they need more retail and more jobs. It is as if they only see the “growth centers” model, and its purported benefit for municipal taxes and services. Small cities like Black Diamond need PSRC to provide other models for prosperity while staying small. Without this, the regional goals will not be achieved because of sprawl.

PSRC could document better solutions for small cities. This could be information on the benefits of how to build an outdoor recreation economy, or data on what local businesses are incompatible with big cities. It could be how local small business owners can run a business and prosper in small towns, but are out-competed or find big cities too expensive to operate in. It could be more education on conservation and environmental restoration. It could be budgeting help and coordination of services through inter-local agreements to cut down costs for small cities. A small community can be a place where both residents and people from the larger cities can enjoy a quiet respite from the big city. PSRC is in a position to provide data on how these small local governments can get enough revenue to fund quality local services without changing the character of the community or exceeding growth targets.

PSRC should also provide information on how growth costs communities. Many people experience drawbacks of growth, such as costs of school expansions and other
government facility expansions, dwindling natural areas, and traffic congestion. The traffic then increases carbon emissions and accelerates climate change. We can plan to spend regional tax dollars to overcome those drawbacks in the growth centers. However, PSRC should emphasize to the small edge cities that regional financial support will be denied to edge cities that plan to grow in excess of their targets.

We suggest that to achieve Vision 2050, it is necessary for PSRC to research and provide education to our leaders on why a “growth and development” strategy may benefit some places but not others. Vision 2050 should be amended to include a new policy to ensure PSRC engages in this educational outreach to local and regional leaders.

MUNICIPAL FINANCE COMMENTS

In Black Diamond, growth has picked up over the last year. Yet so has the need for services. The city elected officials have spent recent meetings talking about raising taxes. Someone even suggested that a car dealership is a great way to get tax revenue for the city. A huge concrete car lot and oversized sales building is the opposite of what Black Diamond needs. Yet many municipalities support zoning for car dealerships because of the local sales tax collection.

PSRC should not support any subsidized infrastructure investments that encourage land developers to build in small towns and rural areas. To meet Vision 2050’s goals, PSRC should provide information to regional and state government officials on how subsidizing growth in the wrong areas hurts us and makes us less prosperous. Land developers are already drawn to small edge cities because property is often less expensive there. Outside those cities in rural areas, developers often buy up additional land, speculating they will eventually get a re-zone to build at urban densities. Then they engage in the outdated practice of encouraging communities to expand roads, telling the people it is for their benefit. But if the roads expand, the developers have more transportation capacity to build more on their land investments. That is why we do not support any transportation funding from PSRC or others that subsidize development in small cities or rural areas.

When the state, county, and city do spend taxpayer dollars, it should not be counter-productive to Vision 2050. Traffic lane expansions exacerbate the problem. Expanding road and transit capacity is expensive and should not be subsidized by the region or federal government in small cities and towns. Yet some cities have come to expect state or county funding to fill their infrastructure gaps. Or they expect the future maintenance needs will magically be covered by future growth, despite no realistic data to support this.

Another way PSRC can help is by providing analysis of developer impact fees. The problem of too much suburban growth is exacerbated as small cities often don’t make developers pay for infrastructure because the local governments believe growth will provide future unquantified economic benefits. Instead, impact fees should be
explained and their possibilities documented. For example, impact fees could be used for safety improvements and multi-modal (bike, walking) transportation in small towns. This would be supportive of Vision 2050. It should be made clear that PSRC subsidies that encourage new development won’t be available to those small cities. There could also be review of environmental improvements that cities need and analysis of how to pay for that. Small cities should plan impact fees accordingly. This would help balance the cost of building in metropolitan areas with the current lower cost of building in “edge” cities.

CLOSING

As far as Black Diamond is concerned, the overwhelming number of residents have chosen to live there for the rural city it is now, not for what it might become after development occurs. We know there is a trade-off between quick access to all services and retail, and the ability to live in a quiet place with a little more land and more wildlife. We support the goals of Vision 2050 and thank you for the chance to comment.

From Save Black Diamond’s Vision 2050 comment team, including:

Gary D. Davis, 32709 2nd Ave, Black Diamond, WA
Robin Buxton, unincorporated King County near Covington, WA
Angela Fettig, Black Diamond, WA
Kristen Bryant, Bellevue, WA
Megan Brocx, Black Diamond, WA
Kelley Sauskojus, Black Diamond, WA
Judy Baxley, Black Diamond, WA
Willard Price, Black Diamond, WA
Alan Gangl, Black Diamond, WA
Joan Gangl, Black Diamond, WA

saveblackdiamond@gmail.com
Paul Inghram, AICP  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA 98104

Dear Mr. Inghram:

Sierra Club is pleased to submit the comments that follow in this document regarding the Draft VISION 2050 Plan for the central Puget Sound Region.

We applaud the efforts of PSRC and regional partners to ensure countywide planning policies, local comprehensive plans, subarea plans for regional centers, and transit agency plans are consistent with VISION 2050 and the GMA, but recognize the magnitude and nature of the challenges.

We remain concerned that PSRC has insufficient tools at its disposal to keep the region moving to achieving the VISION 2050 goals.

Detailed comments are presented below on the various topics addressed in the VISION 2050 draft plan. We have made specific suggestions on some of the enumerated policies associated with the plan, and these are identified in the respective topic sections.

Thank you for the opportunity to contribute to the VISION 2050 process. The Sierra Club considers such planning key to ensuring a sustainable future for our region.

Sincerely,

Tim Gould  
Chair, Transportation & Land Use Committee  
Sierra Club Washington
Policy and Action topic areas
Our comments are provided under headings to match the Vision 2050 Table of Contents. However, most of our comments have applicability across multiple chapters.

Multicounty Planning Policies
Multicounty planning policies are a regional commitment intended to be reflected and supported by regional, county, and local plans.
We urge PSRC, the four counties, and cities to keep the region moving toward the transit-focused growth future that the Regional Growth Strategy describes. An important challenge to meet is to structure the implementation of this Growth Strategy in a way that is flexible to changing conditions and resulting demands, yet still true to the Vision.

In the section “Guidance for Aligning Growth Targets” (p. 43), the role of PSRC to review countywide adoption of growth targets is a key determinant in the future success of the Vision Plan. PSRC must set high standards in its certification of local plans based on actions and measures to implement VISION 2050. This is particularly important when seen from a regional perspective, as each county and city continues to “look out for its own interests.” Based on previous outcomes, we identify a need for PSRC to have greater authority and more policy tools when certifying local comprehensive plans.

REGIONAL COLLABORATION
* Act collaboratively and support local efforts
The degree of success in collaborative action could determine the success or failure of achieving the Vision. Effective coordination among regional and local entities needs improvement over past efforts and outcomes. Examples include transportation concurrency, zoning overlap or inconsistencies among adjacent jurisdictions, and infrastructure planning and development.

We support PSRC efforts to monitor the implementation of VISION 2050 and use targets, performance measures, plan review, and funding to work towards successful implementation. Directing or withholding funds based on performance relative to VISION 2050 objectives and plans will likely be necessary.

REGIONAL GROWTH STRATEGY
We support the selection of a Regional Growth Strategy that promotes a focused regional growth pattern.
Previous local development in jurisdictions on the fringe of the urban area occurred in a manner contradictory to the PSRC regional vision, and detrimental to appropriate investment in regional infrastructure and environmental protection. Some of this local development mis-match was discussed in PSRC’s “Taking Stock 2016”. Vision 2050 should do more to discourage local proposals that will negatively impact the regional Vision. PSRC
should engage in education and outreach to provide policy recommendations the local jurisdictions can adopt and follow to better align with the Regional Growth Strategy.

- The regional growth strategy action RGS-Action-4 should be modified to include such outreach and PSRC education.
- A new regional growth strategy policy, perhaps related to RGS-11, should be added to ensure the outreach action discourages proposals that are inconsistent with growth strategies aligned with the Vision.

Vision 2050 makes clear in the Regional Growth Strategy that in some areas growth and new development are to be discouraged. However, jurisdictions that are not targeted for growth and do not have transit capacity and other key infrastructure of sufficient capacity may mistakenly attempt the same style of growth that is the focus of other cities where appropriate. Decision-makers could direct tax dollars in ways that are not financially sustainable, yet are harmful to the environment in the long run. This problem is exacerbated by the often-cheaper land costs in these largely exurban areas ill-suited for growth. PSRC can do more to make a “business case” for these communities to limit growth, beyond regional and environmental altruism. While Vision 2050 focuses on new development to accommodate expected regional growth, community improvement does not require growth in population with the associated new development.

- Communities can focus on existing infrastructure and on conservation and efficiency, while residents enjoy the lack of disruptions associated with construction projects.
- PSRC should make it clear that grant funding is not available to areas that are not making policy decisions consistent with Vision 2050.
- PSRC should provide policy recommendations to local jurisdictions on placing impact fees on new development, and seek to make such fees consistent with the Vision. Consistency means such fees on development are probably higher in areas that are not targeted for significant amounts of growth, or where such fees are needed for projects to prevent displacement and provide transit.
- PSRC should provide guidance through outreach to local jurisdictions: for cities not targeted for significant growth, what are possible pathways to prosperity and what benefits might they provide their residents. Planning is still needed even under minimal growth scenarios.
- PSRC should provide similar outreach to state legislators to ensure that the efforts to target growth are not undercut by state subsidies for growth in areas where not appropriate.

Additional policy tools will be needed from the state to ensure the region can attain VISION 2050 goals.

ENVIRONMENT:
* **Restore Puget Sound health**
We support actions to reduce impacts from runoff and poor land management practices. An examination of region-wide management of stormwater and the appropriate
technologies along with pre-treatment of specific industrial streams, will need to be included in the analyses and action plans for the region. Low impact development and improved material product management will be key steps; some of these efforts will require action at higher levels of government such as changes in state or federal standards.

**CLIMATE CHANGE:**

*Significantly reduce greenhouse gas emissions*

This vision outcome is the key to creating a thriving future. Strategies for climate resilience and adaptation need to consider a range of scenarios for severity of conditions to address, **while also increasing the priority of GHG reductions.** Emphasis on electrification of freight transport cannot be over-emphasized, especially given the role of central Puget Sound Ports in freight movement both regionally and as a hub for national and international transport.

Given the need for substantial reductions in GHG emissions identified by the Intergovernmental Panel on Climate Change (IPCC) that is necessary by 2030, the PSRC should recalibrate its GHG reduction target to attain by 2030 over half of the total reduction needed to reach complete carbon neutrality by 2050. The accounting of GHG emissions needs to consider the choices and activities of region residents and the resulting emissions that occur as a result through the associated production and supply chain, even if those emissions are in locations far from central Puget Sound.

*Greenhouse Gas Reduction Strategy*

**Land Use:** Effective policies with appropriate incentives and penalties are needed to achieve the local GHG reductions cited in the plan description, “through changes to development patterns that create attractive, compact, and walkable environments, and that encourage location of new residential and commercial construction close to services and amenities, lessening the need for driving”.

**User Fees:** The report states, “VISION 2050 calls for further pursuit of alternative transportation financing mechanisms.” Action after 2025 may not be soon enough to enact such a transition to user fees. We call for time-of-day based congestion tolling on all limited-access highways throughout the region, from Marysville to DuPont and from Silverdale to Issaquah. User fees based on vehicle weight and distance traveled (on all roads, at all times) should be enacted preferably at the state level instead of just the 4-county region.

**Transportation Choices:** Further improvements in the multi-modal system are definitely needed, with particular focus on local efforts to ensure access to the regional transit system, overcoming “first mile/last mile” challenges.

**Technology:** Continued identification and implementation of mechanisms to support electric vehicle (EV) charging infrastructure in publicly accessible locations is a necessary but not sufficient effort to reduce transport GHGs. While encouraging use of EVs, especially in private and public fleets, will reduce emissions, the region needs to move beyond EVs and consider how much we collectively drive and our land-use patterns that make residents car-dependent, if we are to stave off the worst impacts of climate change. The
technology strategy for GHG reductions should focus on regional efforts to support state and national action to achieve electrification of major rail corridors with shift of hauled freight to trains powered by electric locomotives (see solutionaryrail.org).

Proposed changes to Climate Change Policies are presented below with our additions noted in green text.

CC-3 Reduce greenhouse gases by expanding the use of conservation and alternative energy sources, electrifying the vehicle fleet, and reducing vehicle miles traveled by changing land-use patterns to make the “stuff of life” more proximate and accessible and increasing alternatives to driving alone.

CC-6 Address impacts to vulnerable populations and areas that have been disproportionately affected by climate change, and prioritize restorative efforts in these areas.

CC-7 Advance state, regional, and local actions that support resilience and adaptation to climate change impacts without lessening the emphasis on GHG emission reduction efforts.

CC-Action-3 Emission Reduction: Cities and counties will incorporate emission reduction policies and activities in their comprehensive planning. Elements include supporting the adopted Regional Growth Strategy, providing multimodal transportation choices, adopting more compact land-use patterns, and encouraging a transition to a cleaner transportation system.

DEVELOPMENT PATTERNS:

* Protect a network of open space
Effective implementation of the Regional Open Space Conservation Plan is essential to enhancing quality of life as the region grows and population density increases in regional centers and urban core areas. A key challenge is to ensure the distribution of open space access opportunity is fair and equitable.

* Grow in centers and near transit
The stated goal of attracting 65% of population growth to the region’s growth centers and high-capacity transit station areas may not be sufficient to achieve GHG reduction objectives and keep the transportation network functioning. A goal of 70% to 75% of population growth to these designated centers may be more appropriate.

* Growth through Concurrency
PSRC should encourage jurisdictions to be more involved in reviewing development applications of neighboring jurisdictions, and using available tools to receive funding for impacts generated, especially transportation impacts. The current impacts of development permitted in one jurisdiction are usually allowed to cause transportation system costs on
other jurisdictions without any reimbursement. This results in the full cost of development not being paid up front by its proponents, and artificially lowers the cost of growth in areas where that growth is inconsistent with the Regional Growth Strategy.

VISION 2050 requires cities to plan for regional centers, and PSRC will work with counties and cities as they set local housing and employment targets. More forceful policy tools, including financial incentives and penalties via PSRC funding allocations, may be needed to ensure the housing and employment targets are both appropriate for a jurisdiction’s geography and transportation endowment, and achieved in a timely and effective manner. PSRC might need to seek more policy tools from the State in order to provide sufficient incentives to achieve these population target goals.

*Form-based Zoning to Guide Growth*

PSRC should encourage the use of form-based zoning to compliment equity-driven public policies that can overcome past decades of residential zoning that reinforced separation by income, access to local decision-makers, and ethnicity. Form-based zoning regulates the scale and character of buildings, streets, and blocks, placing much less emphasis on the size or number of units or the specific uses inside, thereby enabling walkable, human-scaled development. Assembling a form-based code engages residents in creating a vision for their community and offers a range of choices.

Proposed changes to Development Patterns Policies are presented below with our additions noted in green text.

DP-2 Reduce disparities in access to opportunity for the region’s residents through inclusive community planning and targeted public and private investments that meet the needs of current and future residents and businesses.

DP-4 Support the transformation of key underutilized lands, such as surplus public lands or environmentally contaminated lands (provided clean up standards are attainable), to higher-density, mixed-use areas to complement the development of centers and the enhancement of existing neighborhoods especially to create opportunities to provide low-income and affordable housing options.

DP-11 Design transportation projects and other infrastructure to achieve community development objectives, encourage multi-modal access, and improve communities.

DP-17 Address existing health disparities and improve health outcomes with targeted strategies and investments that can measure improvements in all communities.

DP-20 Provide a regional framework for designating and evaluating regional growth centers and rewarding those centers that achieve targets.

DP-30 Promote innovative new approaches for transit service to and from existing cities in rural areas that can provide both local and connected service.
DP-31 Contribute to improved ecological functions and more appropriate use of rural lands by minimizing impacts through innovative and environmentally sensitive land use management and development practices especially on land near the urban growth boundary to prevent intrusion of urban land uses.

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, with special attention given to such proposals’ effect on jobs and housing balance.

DP-41 Support the sustainability and environmentally sound use of designated resource lands. Do not convert these lands to other uses.

DP-48 Protect Identify opportunities for conversion of military lands from encroachment by incompatible to other uses and development where activities are compatible on adjacent land. The long-term objective should be to reduce the scope and footprint of military operations in the region.

DP-50 Develop, implement, and evaluate concurrency programs and methods that fully consider growth targets, service needs, and level-of-service standards. Focus level-of-service standards for transportation on the movement of people and goods instead of only on the movement of vehicles.

DP-52 Tailor concurrency programs for centers and other subareas to encourage development that is multimodal and can be supported by transit.

DP-Action-1 Implement the Regional Centers Framework: PSRC will study and evaluate existing regional growth centers and manufacturing/industrial centers to assess their designation, distribution, interrelationships, characteristics, transportation efficiency, performance, environmental impacts, and social equity. PSRC, together with its member jurisdictions and countywide planning bodies, will work to establish a common network of countywide centers.

DP-Action-5 Concurrency Best Practices: PSRC will continue to develop guidance on innovative approaches to multimodal level-of-service standards and regional and local implementation strategies for local multimodal concurrency. PSRC, in coordination with member jurisdictions, will identify approaches in which local concurrency programs fully address growth targets, service needs, and level-of-service standards for state highways. PSRC will communicate to the Legislature the need for state highways, public transit investments, and support for a clean energy future to be addressed in local concurrency programs.

DP-Action-9 Mode Split Goals for Centers: Each city with a designated regional growth center and/or manufacturing/industrial center will establish mode split goals for these centers and identify strategies to encourage transportation demand management and alternatives to driving alone with incentives and penalties for performance.
HOUSING:
* Increase housing choices and affordability
We support the action to build more diverse housing types, especially near transit, services, and jobs, to ensure all residents have the opportunity to live in thriving urban places. Coupled with an increase in housing supply, these policies should also provide strong incentives and regulatory recommendations for more environmentally friendly construction. Low-energy buildings and use of "green" materials may increase some initial construction costs, but the increased energy efficiency and healthier building materials will result in savings for residents and reduced impacts in the long run.

Natural green space including trees next to homes should be prioritized especially for households with children and those with lower incomes. This is a challenge for existing land use designations and a challenge in growth centers. However, we find that proximity to natural features is a key ingredient to increase the willingness of families to choose to live in compact neighborhoods. Such housing must be attractive and healthy to more people in order to reduce the market pressure toward sprawl. Advanced technology such as self-driving cars could prompt households to select sprawl since they can simply work in the car during a long commute.

We recommend that all multi-family dwellings even in the most urban areas include green space on their parcel, or support acquisition and maintenance of public green space in the neighborhood. This can be achieved through limitations on impervious surface coverage and building higher on a smaller footprint similar to designs of residential towers in the Vancouver, BC metropolitan area.

The result will be more livable urban homes that ultimately reduce the demand for growth in housing on the exurban fringe where infrastructure is inadequate and job centers lacking. Most exurban and rural development occurring in our region involves the conversion of natural areas and therefore results in environmental harm.

PSRC needs more ambitious and measurable goals along with incentive and penalty tools applied to regional cities to ensure the housing objectives are achieved. VISION 2050 also calls for more housing affordable to low- and very low-income households; a major challenge is to implement this objective in a way that distributes such housing in a geographically equitable way.

ECONOMY AND PUBLIC SERVICES:
* Provide opportunities for all
Direct resources to localities that have been neglected or marginalized in the past. The region needs metrics to measure how, where, and to what extent displacement and lack of opportunities are being avoided and/or remediated.

* Sustain a strong economy
We support the objective of job creation in all of the region’s communities so as to result in a better balance of jobs and housing.
- A major challenge is to identify and implement the policy tools to achieve this without overburdening infrastructure in lower population cities.
- PSRC and Counties need to consider location relative to regional growth centers and corresponding transportation network in directing employment incentives. Jobs in locations not well served by the regional transportation network will not serve the region well.

**TRANSPORTATION:**

* Keep the region moving

High-capacity transit and the location of employment, housing, and service centers around its access points will be a key way of ensuring that people can maintain mobility in a sustainable and low-impact manner.

We need to move quickly to a user pricing scheme that is based on user impacts to the transportation system both in terms of vehicle emissions and presence on roadways at peak times of high demand for travel. Regional or state-wide pricing systems need to maintain flexibility in directing its resources to efficient and low-impact travel modes and resources. The era of transportation user revenue supporting only highway expenditures is over. User fee revenue must apply to all transportation modes and be used for system maintenance as well as to reduce air and water pollution that results from road usage.

* Transportation Concurrency and related areas of application

GOAL: The Sierra Club supports the Transportation Goal:
“The region has a sustainable, equitable, affordable, safe, and efficient multimodal transportation system, with specific emphasis on an integrated regional transit network that supports the Regional Growth Strategy and promotes vitality of the economy, environment, and health."

However, this does not go far enough. It rightly emphasizes “an integrated regional transit network,” but falls short in espousing the strong regional integrated transportation network needed to make this a reality.

The Sierra Club views our regional transportation network at it would a watershed, which drains all the tributaries (roads), e.g., rivulets, streams, and rivers and rainfall (traffic) to common outlets (jobs, homes, entertainment), e.g., lakes, bays, and oceans. When viewed in this fashion, our transportation network begs to be addressed from a regional perspective. Unfortunately, current laws and practices box us in to only looking at pieces of the overall system from a purely local perspective.

**Background**

Counties and cities prepare Transportation Improvement Plans (TIPs) and accompanying Transportation budgets with a narrow lens. While small parts of these plans are executed using some external monies (State, PSRC, etc.), largely locally generated funds are used and, thus, primarily local perspectives drive such planning and implementation.
One major tool the State Growth Management Act (GMA) provides to jurisdictions is Concurrency. As the Municipal Research and Services Center (MRSC) states: “The GMA requires that transportation improvements or strategies to accommodate development impacts need to be made concurrently with land development. ‘Concurrent with the development’ is defined by the GMA to mean that any needed “improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years.’ RCW 36.70A.070(6)(b). Local governments have flexibility regarding how to apply concurrency within their plans, regulations, and permit systems. As part of the requirement to develop a comprehensive plan, jurisdictions are required to establish level-of-service standards (LOS) for arterials, transit service, and other facilities. RCW 36.70A.070(6)(a). Once a jurisdiction sets an LOS, it is used to determine whether the impacts of a proposed development can be met through existing capacity and/or to decide what level of additional facilities will be required.”

Concurrency can be and should be a powerful tool to ensure our transportation network truly is “concurrent.”

Concern
Concurrency is a useful method for jurisdictions to assess their transportation networks and mitigation needs. However, Concurrency largely is applied at the local level, whereby cities rarely go too far beyond their own boundaries when assessing the adequacy of their transportation networks. Time and time again, this lack of connectivity has proven to be the Achilles’ heel of Concurrency.

Without a regional perspective, local Concurrency testing falls far short of ensuring our transportation network performs seamlessly. As a result, there are bottlenecks at critical points in the system with no clear solutions in sight.

This clearly identifies the need for PSRC to provide a regional perspective, but to do so it needs a regional set of “carrots and sticks.” Unfortunately, PSRC is provided by the State only a set of local tools (e.g., local Comprehensive Plan certification authority and control of some Federal Highway funds), which are insufficient to the task no matter how well PSRC attempts to wield them.

Concurrency Conclusion
It is apparent to the Sierra Club that PSRC has insufficient tools to ensure VISION 2050 transportation goals, strategies, policies, and actions can be achieved. Beyond the strong planning, coordination, and data development PSRC already does on a daily basis, it certifies local Comprehensive Plans and then doles out Federal Highway funds accordingly. PSRC needs far more authority from the State along the lines of regional Transportation Concurrency, etc. We expect counties and cities will fight such structural changes rather than give up any of their own authority, but we see no other way to truly achieve the regional perspective that is sorely needed.
Recommendation
PSRC should work with the State Legislature to revise the Concurrency portions of the GMA to include a top-level regional look at interwoven transportation networks. One way this could be done is to allow PSRC to provide input to city concurrency testing for major developments (both commercial and residential). Such input could include traffic data, demographic trends, traffic-demand modeling, etc. Also, PSRC could provide critical comment on city concurrency testing and mitigation proposed. The challenge is in how much oversight power PSRC should have over local concurrency testing: too little would result in only small improvements over the present situation; too much could alienate cities from sharing all their information with PSRC.

* Evaluation of Transportation Policies
Proposed changes to Transportation Policies are presented below with our additions noted in green text.

T-5 Develop a transportation system that minimizes negative impacts to, and promotes, human health. **Consider the current scientific literature regarding exposure to effects from emissions originating from various modes of transport.**

T-6 Pursue alternative transportation financing methods, such as user fees, tolls, and other pricing mechanisms **that are based on the user impacts on the system and related externalities**, to manage and fund the maintenance, improvement, preservation, and operation of the transportation system.

T-8 Strategically expand capacity and increase efficiency of the transportation system to move goods, services, and people consistent with the Regional Growth Strategy. **Expanded capacity should be a last resort and directed at specific bottlenecks or safety hazards that impair mobility within the transportation system.** Focus on investments that produce the greatest net benefits to people and minimize the environmental impacts of transportation.

T-12 Emphasize transportation investments that provide and encourage alternatives to single-occupancy vehicle travel and increase **multi-modal** travel options, especially to and within centers and along corridors connecting centers.

T-15 Prioritize investments in transportation facilities and services in the urban growth area that support compact, pedestrian-and transit-oriented densities and development. **Prioritize such facilities with compact development patterns to be located along corridors that follow arterial streets and avoid major highways that create pollution impacts that negatively affect the compact residential, commercial, and related activity.**

T-19 Design transportation programs and projects to support regional growth centers and high-capacity transit station areas and their **multi-modal access networks.**
T-20 Promote the preservation of existing rights-of-way, including non-motorized trail corridors, for future high-capacity transit.

T-24 Improve key facilities, including those located outside PSRC jurisdiction, connecting the region to national and world markets to support the economic vitality of the region.

T-27 Coordinate regional planning with rail line capacity expansion plans especially those that emphasize electrification of major rail corridors for both passenger and freight use, and support capacity expansion that is compatible with state, regional, and local plans.

T-28 Promote coordinated planning and effective management to optimize the existing aviation system prior to development of new airports. Accommodate seriously scrutinize anticipated regional growth in aviation considering its impacts to climate from GHG emissions, available alternative travel modes, and prioritize while minimizing health and noise impacts in communities.

T-29 Support the transition to a cleaner transportation system through investments in zero emission vehicles, electrified rail corridors and locomotives, low carbon fuels and other clean energy options.

T-Action-4 Climate: PSRC will continue to monitor and advance the implementation of the adopted Four-Part Greenhouse Gas Strategy - or future versions thereof - to achieve meaningful reductions of emissions throughout the region from transportation and land use. This will include ongoing collaboration with a variety of partners on each element, for example regional coordination on electric vehicle infrastructure, rail corridor electrification, roadway pricing, transit-oriented development and others. This will also include continued development of regional analyses and research of additional options for reducing emissions within a time frame as identified by the IPCC that can make a positive difference in climate impacts.

IMPLEMENTATION
Much effort is needed by PSRC and regional partners to ensure countywide planning policies, local comprehensive plans, subarea plans for regional centers, and transit agency plans are consistent with VISION 2050 and the GMA.

- We applaud these efforts but recognize the magnitude and nature of the challenges.
- We remain concerned that PSRC has insufficient tools at its disposal to keep the region moving to achieving the VISION 2050 goals (see substantial comments in the Transportation Concurrency sub-section).
- PSRC could add outreach and education to local elected officials and to state Legislators to its activities as one possible tool to improve the likelihood of achieving the Vision 2050 benefits.
Snohomish County Camano Association of Realtors
09/16/2019

Snohomish County Camano Association of Realtors (SCCAR) represents nearly 2,000 Realtors across Snohomish County, including Camano Island. As the Director of Government and Public Affairs for SCCAR, we wanted to comment our support for the VISION 2050 overview point of prioritizing the increase of housing choices and affordability. To us, this should be the number one priority. All types of affordable homes should be incentivized and built for people of all different income levels: condominiums, town-homes, duplexes, single-family homes, etc. We do agree increasing density near high capacity transit areas is a smart way to grow and to increase housing affordability. However, this shouldn't be at the cost of neighborhood desirability - protecting our green spaces, and keeping our neighborhoods safe and clean. And, high to medium density housing is needed, but just as much as single family homes are needed to increase supply and reduce demand which allows for affordable homeownership. We obviously support homeownership and property rights, as homeownership increases committed and investment into the community in which one owns property. Thank you for your time, if you need any further information or have any questions, please feel free to contact me at cami@sccar.org or 425.339.1388.
Snohomish County School Districts Group

Everett, Monroe, and Snohomish School Districts

September 16, 2019

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

Re: Snohomish County School Districts Group
Comment Letter regarding draft VISION 2050

Dear Mr. Inghram:

On behalf of the Snohomish County School Districts Group (the “Schools Group” or the “Group”), we are writing to provide comments on and to propose amendments to draft VISION 2050. The Snohomish County School Districts Group is a group of school districts that work together on issues of common interest in Snohomish County. The members are the Everett, Monroe, and Snohomish School Districts.

The Schools Group is concerned that the policies in draft VISION 2050 regarding school siting fail to acknowledge the diversity in the region. Currently, there are four different processes for school siting in King, Pierce, Kitsap, and Snohomish Counties. In addition, provisions in draft VISION 2050 conflict with RCW 36.70A.213, which authorizes the extension of utilities to schools in the rural area that serve students from the rural area and from the urban area. If adopted in their current form, draft VISION 2050 policies could exacerbate the challenges that school districts already face in planning for and siting new schools. Below please find our comments and a number of proposed amendments to the policies governing school siting.

I. Vision 2050 should acknowledge the diversity in the Puget Sound region:

The Schools Group urges the Puget Sound Regional Council (“PSRC”) to consider how diversity in the region affects the siting of schools. Differences in growth patterns and the availability of suitable land within the Urban Growth Area (“UGA”) have led to different approaches for siting schools as reflected in the planning policies of King, Pierce, Kitsap, and Snohomish Counties. The language in draft VISION 2050 does not acknowledge the regional diversity and the distinct legal framework in each of the four counties covered by the multi-county document.

A. King County:

Of the four counties, King County has the largest population, with over 2.2 million residents and 1,000 residents per square mile, according to recent U.S. Census data. King County created its own process for siting schools in 2012 through the School Siting Task Force. The Task Force findings were incorporated into the King County Comprehensive Plan. The Comprehensive Plan identifies and designates five sites in the rural area as
permissible for siting schools indefinitely into the future. When these school districts decide to build on the five sites, the districts will submit their land use applications pursuant to King County’s permitting process. Based on the unique needs of the communities served by these districts, the rural school sites can serve students from any part of the district. Therefore, in King County, it is legally permissible for schools built on any of the five rural sites to serve students (even if those students predominately reside in the urban area).

B. Pierce County:

Pierce County, the second-largest county in the state, has grown by over 12 percent since 2010, to a population of almost 900,000. In 2017, the State Legislature enacted RCW 36.70A.211 and .212 (Engrossed Substitute House Bill 1017). This statute created a process by which Pierce County “may authorize the siting in a rural area of a school that serves students from an urban area, even where otherwise prohibited by a multicounty planning policy . . . .” RCW 36.70A.211. The provisions of RCW 36.70A.211 and .212 govern one and only one county. Unless state law is amended, this school siting process is only accessible to school districts located in Pierce County. Following the Pierce County process, a school can be sited in the rural area even if most of the students who attend that school reside in the urban area.

C. Kitsap County:

Kitsap is the smallest of the four counties, with an estimated population of less than 270,000 residents. The population of Kitsap County has only increased by 7.4 percent from 2010 to 2018 according to recent U.S. Census data. Since Kitsap County is smaller, its policy for siting schools is less complex. The Kitsap County Comprehensive Plan directs the County to “[w]ork with public school districts to ensure continued understanding of their anticipated land use plans.” Chapter 1, Page 27.

D. Snohomish County:

Over the past decade, the population of Snohomish County has increased by 14 percent. As a result, many schools in Snohomish County currently operate beyond capacity. This forces districts to redraw attendance boundaries, purchase more portable classrooms, and repeatedly seek voter approval for bonds to fund school construction projects. Schools throughout the County serve more students than those schools were originally designed to serve.

For example, Everett Public Schools currently serves 20,079 students. It is projected that by 2029, an additional 1,850 students will need to be served by this District. Currently, the District uses 141 portable classrooms and is planning for at least three new elementary schools, one new middle school, and one high school. These are common concerns throughout Snohomish County, and the problem is exacerbated by the lack of suitable school sites.
The availability of new school sites within the UGA has continued to decrease during the recent population boom. Almost thirty years after the enactment of the Growth Management Act ("GMA"), the County faces the situation where much of the land within the UGA has already been developed. Additionally, acquiring new sites within the UGA can be cost prohibitive, especially for school districts that serve students living in the urban area and in the rural area.

For these reasons and others, districts in Snohomish County have planned, acquired sites, and permitted and built schools to accommodate the demand for additional capacity. Throughout the process of purchasing sites, the districts have taken steps and have complied with the provisions of the Snohomish County Comprehensive Plan and the Snohomish County Countywide Planning Policies.

For example, the Countywide Planning Policies permit school sites in the rural area that are adjacent to the UGA to be moved into the UGA:

In the event that it is demonstrated that no site within the UGA can reasonably or logically accommodate the proposed [school] facilities, urban growth area expansions may take place to allow the development of these facilities provided that the expansion area is adjacent to an existing UGA.

Snohomish County Countywide Planning Policies, Development Patterns Chapter (Pages 22-23).

Versions of this policy have been in place since 2003, with the current policy adopted in 2011. It complies with Vision 2040. Furthermore, the Snohomish County Comprehensive Plan states:

10.A.5 The County shall review and consider modifications to its development regulations as necessary to facilitate school siting within urban growth areas and discourage the location of middle and high schools outside of UGAs.

Capital Facilities Chapter (Page 18).

School districts in Snohomish County have been advised that it is permissible to site elementary schools outside the UGA based on these adopted polices. While the County’s policies discourage the siting of middle and high schools outside the UGA, it is not prohibited. This policy has been a part of the Snohomish County Comprehensive Plan since 1994. Again, these policies predate Vision 2040.

II. Extension of sewers to schools in the rural area:

In 2017, the Washington State Legislature enacted RCW 36.70A.213. The statute states:
This chapter does not prohibit a county planning under RCW 36.70A.040 from authorizing the extension of public facilities and utilities to serve a school sited in a rural area that serves students from a rural area and an urban area so long as the following requirements are met . . . .

RCW 36.70A.213(1) (emphasis added). This sewer provision is found in House Bill 2243. ESHB 1017 created the Pierce County process.

MPP-PS-10 of draft VISION 2050 should be revised to take into account the changes to state law.

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. Alternative technology to sewers should be considered only when it can be shown to produce treatment at standards that are equal to or better than the sewer system and where a long-term maintenance plan is in place.

Draft VISION 2050 at page 129 (emphasis added).

MPP-PS-7 also refers to sanitary sewer extension within the UGA. Based on the preamble to this section of draft VISION 2050, MPP-PS-7 and MPP-PS-10 are intended to “allow[] certain services, such as sanitary sewers, only in the urban growth area – with few exceptions (RCW 36.70A.110 (4)).” Draft VISION 2050 at page 125. These policies should be revised. At a minimum, the policies should cross reference RCW 36.70A.213, which authorizes, under certain circumstances, sewer service for schools in the rural area.

III. Proposed Amendments to draft VISION 2050:

When we take into account the diversity in the Puget Sound area, the Schools Group proposes the following amendments to draft VISION 2050:

- **MPP-PS-25:** Work cooperatively with school districts to plan for school facilities to meet the existing and future community needs consistent with adopted comprehensive plans and growth forecasts, including siting and designing schools and recommending that counties and cities provide to support safe walking conditions able access to schools and best serve their communities. (draft VISION 2050, page 130).

- **MPP-PS-26:** Except as provided for by RCW 36.70A.211, by a countywide school siting task force report, or by countywide planning policies, site schools, institutions, and other community facilities that primarily serve urban populations within the urban growth area in locations where they will promote the desired growth plans, except as provided for by RCW 36.70A.211. (draft VISION 2050, page 130).

- **Proposed MPP-PS-26-B:** Where authorized by a countywide planning policy, in the event that it is demonstrated that no site within the Urban Growth Area (“UGA”) can
reasonably or logically accommodate a proposed school, urban growth area expansions may take place to allow the development of schools, provided that, the expansion area is adjacent to an existing UGA. (insert into draft VISION 2050, page 130).

- **MPP-PS-27:** Except as provided for by RCW 36.70A.211, by a countywide school siting task force report, or by countywide planning policies, locate schools, institutions, and other community facilities serving rural residents in neighboring cities and towns and design these facilities in keeping with the size and scale of the local community, except as provided for by RCW 36.70A.211. (draft VISION 2050, page 130).

- **MPP-PS-7:** Obtain urban services from cities or appropriate regional service providers. Encourage cities, counties, and special service districts, including sewer, water, and fire districts, to coordinate planning efforts, agree on optimal ways to provide efficient service, to implement the provisions of RCW 36.70A.213, and move towards consolidations that would improve service to the public. (draft VISION 2050, page 127)

- **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. Service outside of the urban growth area shall be provided in a manner that complies with the provisions of RCW 36.70A.213. Alternative technology to sewers should be considered only when it can be shown to produce treatment at standards that are equal to or better than the sewer system and where a long-term maintenance plan is in place. (draft VISION 2050, page 127).

**IV. Rationale for the Proposed Amendments:**

The proposed amendment to MPP-PS-25 recognizes that counties and cities design and provide safe walking conditions and the amendment recommends that safe walking conditions be provided.

The proposed amendment to MPP-PS-26 and MPP-PS-27 acknowledges that there are four different processes for siting schools in King, Pierce, Kitsap, and Snohomish Counties. The new text recognizes the diversity in the region. The proposed amendments to MPP-PS-26 and MPP-PS-27 are consistent with existing Snohomish County Policies.

The proposed language of MPP-PS-26-B tracks the provisions of the existing Snohomish County Countywide Planning Policies. Furthermore, Snohomish County currently advises school districts that it is permissible to site elementary schools outside the UGA. While the County’s Policy discourages the siting of middle and high schools outside the UGA, the County’s Comprehensive Plan does not prohibit the siting of middle and high schools in the rural area.
The proposed amendments to MPP-PS-7 and MPP-PS-10 are consistent with RCW 36.70A.213, which authorizes the extension of sewers to schools in the rural area (that serves students from the rural area and from the urban area).

V. Comment Letter submitted by Snohomish County Tomorrow:

As outlined above, the Schools Group has proposed a number of amendments to draft VISION 2050. However, the heart of the amendments is this basic principle: As we move through the VISION 2050 process, the existing policies in the Snohomish County Countywide Planning Policies and the Snohomish County Comprehensive Plan regarding school siting should be preserved.

Snohomish County Tomorrow ("SCT") has articulated another approach for reaching the same outcome with respect to school siting. In its September 12, 2019 letter, SCT states:

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

Snohomish County Tomorrow’s comment letter dated September 12, 2019 (Page 4).

In the alternative, the Schools Group supports the paragraph set forth in the Snohomish County Tomorrow’s September 12, 2019, letter regarding school siting. To the extent that draft Vision 2050 is viewed as being consistent with the policies governing school siting in the existing Snohomish County Countywide Planning Policies and the Snohomish County Comprehensive Plan, then the update to this policy is not needed. Based on this framework, only the amendments to MPP-PS-7, MPP-PS-10, and MPP-PS-25 of draft Vision 2050 would be required.

If you have any questions, please call me at (206) 370-7814. Thank you.

Sincerely,

Grace T. Yuan
Legal Counsel
The Puget Sound Regional Council is working on Draft Vision 2050 and is requesting public comments. Below please find a number of proposed amendments to the policies governing school siting.

- **MPP-PS-25** Work cooperatively with school districts to plan for school facilities to meet the existing and future community needs consistent with adopted comprehensive plans and growth forecasts, including siting and designing schools and requesting that counties and cities provide to support safe, walking conditions, able access to schools and best serve their communities. (Draft Vision 2050, page 130).

- **MPP-PS-26**: Except as provided for by RCW 36.70A.211, by a countywide school siting task force report, or by countywide planning policies, site schools, institutions, and other community facilities that primarily serve urban populations within the urban growth area in locations where they will promote the desired growth plans, except as provided for by RCW 36.70A.211. (Draft Vision 2050, page 130).

- **Proposed MPP-PS-26-B**: Where authorized by a countywide planning policy, in the event that it is demonstrated that no site within the Urban Growth Area (“UGA”) can reasonably or logically accommodate a proposed school, urban growth area expansions may take place to allow the development of schools, provided that, the expansion area is adjacent to an existing UGA. (insert into Draft Vision 2050, page 130).

- **MPP-PS-27**: Except as provided for by RCW 36.70A.211, by a countywide school siting task force report, or by countywide planning policies, locate schools, institutions, and other community facilities serving rural residents in neighboring cities and towns and design these facilities in keeping with the size and scale of the local community, except as provided for by RCW 36.70A.211. (Draft Vision 2050, page 130).

**RATIONALE:** The proposed amendment to MPP-PS-25 recognizes that counties and cities design and provide safe walking conditions. The proposed amendment to MPP-PS-26 and MPP-PS-27 acknowledges that there are three different processes for siting schools in Pierce, King, and Snohomish Counties. The new text recognizes the diversity in the region. The proposed amendments to MPP-PS-26 and MPP-PS-27 are consistent with existing Snohomish County Policies.

The proposed language of MPP-PS-26-B tracks the provisions of the existing Snohomish County Countywide Planning Policies. Furthermore, Snohomish County currently advises school districts that it is permissible to site elementary schools outside the UGA. While the County’s Policy discourages the siting of middle and high schools outside the UGA, the County’s Comprehensive Plan does not prohibit the siting of middle and high schools in the rural area.

If you have any questions, please call Grace T. Yuan at (206) 370-7814. Thank you.
Grace Yuan, Legal Counsel for Snohomish County School Districts Group, provided verbal comments at the September 5 Growth Management Policy Board Public Hearing. Ms. Yuan provided two handouts to PSRC Staff requesting amendments to VISION 2050 (specifically MPP-PS-25, MPP-PS-26, MPP-PS-27 and new policy MPP-PS-26-B). Ms. Yuan stated the first amendment would allow urban growth boundaries to be adjusted if a school site is adjacent to the urban growth area. Ms. Yuan briefly described the school districts’ boundary characteristics and challenges with school siting. She stated that additional requested amendments recognize that each county is diverse in their school siting needs and would allow counties to maintain their current policies regarding siting schools. She briefly described the various ways that counties manage school siting. Ms. Yuan stated that current Snohomish County policies discourage placement of schools in rural areas but do not prohibit their placement in rural areas.
Tom Laufmann, Executive Director of Business Services for the Snohomish School District, provided verbal comments at the September 5 Growth Management Policy Board Public Hearing. Mr. Laufmann described challenges facing the Snohomish School District and placement of schools in rural areas. Mr. Laufmann requested that PSRC allow the Snohomish School District to site schools according to current Snohomish County policies.
September 16, 2019

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

Subject: Draft VISION 2050: A Plan for the Central Puget Sound Region

Dear Mr. Brown:

Thank you for the opportunity to comment on the Puget Sound Regional Council’s (PSRC) Draft VISION 2050 plan. The plan’s articulation of regional goals, multicity county planning policies, and regional and local actions are the foundation for the work of all local, countywide, and regional governments in the central Puget Sound. On behalf of Sound Transit, I would like to make a few comments about the Draft VISION 2050 plan.

- **Integrated land use and transportation planning.** The voters of the Sound Transit district have made multiple and increasingly ambitious commitments to the creation of a regional high capacity transit system. By 2041, the light rail system will include 116 miles of track and more than 80 stations. The region will be served by multiple bus rapid transit lines, commuter rail, and a web of local transit service. Sound Transit’s regional system is premised on connecting regional centers that are designated by PSRC. Perhaps the most ambitious goal of the draft VISION 2050 plan is that 65% of population growth and 75% of employment growth between today and 2050 be located within regional growth centers and within walking distance of high capacity transit. We will be tracking how this goal is translated through the development of local comprehensive plans in 2023 and 2024 and encourage PSRC to bring a context sensitive approach that supports cost efficient delivery of high capacity transit investments.

- **Housing.** We appreciate the draft VISION 2050 plan’s focus on housing affordability and recognize that the creation of new housing supply has not kept pace with the rapid population and employment growth the region has experienced over the past decade. The plan’s clear-eyed identification of the need for public intervention and subsidy to increase the supply of housing at all income levels is commendable. The Sound Transit Board of Directors updated the agency’s Equitable Transit-Oriented Development policy in 2018. This policy, along with our system expansion plans, uniquely positions Sound Transit in this space, and we look forward to supporting the development of a regional housing strategy following the adoption of VISION 2050.
• **Equity.** Sound Transit offers its strong support for PSRC to lead the development of a regional equity strategy. More than any other regional actor, PSRC can create a common approach for how the region implements land use and transportation planning in a way that centers racial and social equity. The tools, resources, strategies, and best practices identified through a regional equity strategy will ensure a shared regional understanding of local governments role in support of equitable outcomes in line with VISION 2050’s goals.

• **Climate Change.** The impacts of climate change pose a generational challenge and is almost certain to have detrimental affects on the environmental character and quality of life that makes the central Puget Sound unique. The Climate Change section of the draft VISION 2050 plan is clear about sources of greenhouse gas emissions, the targets set at various levels of government, and the region’s own four-part greenhouse gas strategy; there is little indication about whether things are getting better or worse. VISION 2050 would be stronger if it also spoke to the trends in emissions and whether the region or state is on track. And while the draft VISION 2050 plan acknowledges that “PSRC does not directly regulate or provide funding for environmental issues and projects,” there is an opportunity to use PSRC’s convening role to advocate for more urgent action at the state and national levels.

• **Implementation.** As already stated, Sound Transit is an essential implementer of VISION 2050 through the construction and operation of regional high capacity transit. As countywide growth targets are set, an update to the Regional Transportation Plan begins, and the next cycle of local comprehensive planning gets underway, we will rely on PSRC to champion local land use planning that maximizes compact, efficient development that supports the high capacity transit system we are implementing.

• **Funding.** We encourage PSRC to go beyond Regional Collaboration Action 5 and specifically look at how the funds that PSRC manages can be used in new and different ways, or could be leveraged with other sources to achieve the goals identified in VISION 2050.

I want to commend PSRC’s Growth Management Policy Board and staff for the level of effort that went into developing the draft VISION 2050 plan. Sound Transit looks forward to actively implementing the VISION 2050. Please let me know if you have any questions about our comments or if you would like to discuss further how PSRC and Sound Transit can collaborate on the implementation of VISION 2050.

Sincerely,

Don Billen
Executive Director
Planning, Environment & Project Development

cc: Carrie Avila-Mooney, Director, Regional Government and Community Relations
Brooke Belman, Deputy Executive Director, Office of Land Use Planning & Development
Matt Shelden, Deputy Executive Director, Office of Planning & Innovation
Alex Krieg, Senior Manager – Planning & Integration
Sept. 16, 2019

Puget Sound Regional Council Growth Management Policy Board
1011 Western Avenue, Suite 500, Seattle, WA 98104

Dear Chair Ryan Mello and Board Members:

Thank you for including health and equity in the Vision 2050 draft plan. It is exciting to see this work come together. I have enjoyed being on the board and providing input. To achieve our shared vision, we need to strengthen Vision 2050:

Regional Collaboration
- Develop work plans with the Central Puget Sound Economic Development District Board to address jobs-housing match and advocacy for state and federal policies and funding.
- Develop shared measures and stories to improve communication, community engagement, and accountability. Involve board members, community partners, and others.
- Revive Regional Equity Network or similar group to help inform and implement PSRC work.
- Hire community-based organizations to help with equity and outreach work.
- Reach out to those who provided public comments, including youth. Share how we used their comments, and how they can continue to inform and champion this work.

Implementation
- Show where PSRC makes investments and why to build broader support around the region.
- Use shared measures to evaluate policies and implementation progress. Include these measures in the project selection criteria. Share them online, at PSRC meetings, etc.
- Set greenhouse gas emission targets, preferably what Puget Sound Clean Air Agency set.
- Monitor jobs-housing match, not just jobs-housing balance.

Vision 2050 should appeal to a broad audience. With that in mind, we should consider:
- A short, inspiring vision statement everyone can remember, repeat, and relate to.
- Short summaries of the plan, each section, and shared measures.

We look forward to working with the board, staff, and others to make our communities healthier places to live, learn, work, and play.

Sincerely,

Anthony L-T Chen, MD, MPH
Director of Health
Integrating Health Throughout Vision 2050
We are pleased to see health and equity recognized as desirable outcomes of Vision 2050. These two areas should be key results from all aspects of the Plan. To better integrate health into Vision 2050, staff provides specific comments and recommendations below to connect each planning element with health. We also ask PSRC to consider policies proposed in the Health and Equity Assessment of the Draft Plan prepared by our Healthy Community Planning Interest Group, dated April 2019.

Improving Readability
We all need to communicate with and engage more people in our region to build support for plans, policies, and investments. Civic participation is also vital to health and well-being (Healthy People 2020).

PSRC can remove barriers to participation by creating short, readable and scannable materials and web pages. With a broad and busy audience in mind:
- Vision 2050 needs a short, inspiring vision statement that we can all remember, repeat and relate to. We applaud the statement on page 1 based on the triple bottom line. If Vision 2050 is for a broader audience, however, we recommend shortening the statement.
- Similar goals are listed on page 1, in the overview on pages 3-7, and the nine Multicounty Planning Policies. One set of goals used throughout would be more elegant, less redundant.
- Photos showing diverse people walking, biking, taking transit, working and enjoying life in different parts of our region help communicate Vision’s vision and goals. We suggest changing the cover photo to better communicate what Vision is about. Photos without people are a lost opportunity to show positive examples of growth management.
- Lead each section with a visual showing key concepts in the text.
- Remove redundant text and make it easier to read and browse.
- Create short summaries of the plan, each section and shared measures with visuals, limited text and plain talk.

Commuting and Health: Monitor Jobs-Housing Match
Multicounty Planning Policies address and mitigate major challenges facing the region in the coming three decades. Many major issues, including transportation choices, affordable housing, a sustainable economy and climate change, directly affect health and equity. However, one outstanding challenge must be given serious consideration in this Plan to address mental health and obesity—that is, work-related commuting. Commuting is very harmful to our physical health and social, emotional well-being. Research reveals that the longer the commuting, the higher the odds for smoking, insufficient physical activity, sleep deprivation, and the lesser time for healthy food preparation and connecting with friends and family members, etc.

To reduce commuting time, solely relying on achieving a 1.0 jobs-housing balance is not enough. This numeric ratio must work hand in hand with the right match of “wage levels and housing price-points” in any compact centers. Without monitoring “jobs-housing match”, the Plan can’t assure that people working in any compact, mixed-use center can attain housing nearby which they can afford with their earned income. If one could afford living close to work, the stress caused by long commuting would be reduced and health improved.

The Health Department recommends the consideration and monitoring of “jobs-housing match” in conjunction with “jobs-housing balance” throughout the Plan. This is reflected in many of the detailed comments below.
A Vision for 2050:

- “Quality of life” is mentioned throughout this Draft. However, the term is not well-defined. Consider adding a definition for the term, in a manner similar to how the definition of “equity” is inserted on page 16; and in the Glossary. A clear definition can help staff develop meaningful community indicators to track improvements in “quality of life” over time.
  - **Quality of Life:** A broad multi-dimensional concept comprised of two domains—“individual health and well-being”, and “neighborhood livability”. The first domain includes physical health and social, emotional and mental well-being. The second relates to those rich opportunities in our neighborhoods affording one to fully enjoy life, such as access to living wage jobs, affordable housing, reliable transit, good schools, safe parks and protected natural areas, etc. (CDC)
- The newly released *A Road Map to Washington’s Future* introduced the concept of “quadruple bottom line”. Besides, equity, economy and environment, culture is an important contributing factor that makes places livable, cohesive and vibrant. Consider folding in the fourth foundation pillar of “culture” in the vision statement and the aspirational planning outcomes:
  - Add “, culturally vibrant” between “connected” and “communities” in the vision statement.
  - Under the desired outcome of “Community”: add “of diverse cultures” after “communities”.
- Support “health and equity” as key desired outcomes for the Plan.
  - Health: It’s important to talk about health beyond physical activity. Recommend adding “socially and physically” before “active”.
  - Economy: Replace the last sentence with “Retail, industrial and manufacturing, living wage, and green jobs opportunities are maintained encouraged.”
  - Environment: Replace “the natural environment is...” with “Natural Environments are...” Add a sentence at the end “Built environments enhance air quality, water quantity and quality, neighborhood livability, and quality of life.”
  - Public Facilities and Services: Add “, fair and” before “, efficient”.

Toward a Sustainable Future

Increase housing choices and affordability (page 3):

- Replace the word “zoning” in the last sentence with “regulatory tools.” Zoning gives an impression of Euclidean zoning. Evidence shows that missing-middle housing is best managed through other regulatory tools, such as form-based codes.

User Guide

- Start with visuals, shorten text and include actions.
- Implementation (page 8): Add a new bullet: “Other Regional Actions, such as Regional Housing and Equity Strategies”.
- Figure 3 – add actions, delete “detailed functional,” “Metropolitan Transportation Plan,” and “Comprehensive Economic Development Strategy.”
Staff Comments

Multicounty Planning Policies

- Performance measures should be developed for each planning element to track how each planning goal and their polices can achieve the desirable outcomes of the Plan. See additional comments under “Implementation” Chapter.
- Figures 6 and 7 difficult to read – put on separate pages or remove tables.
- Environment page 49: great to see goal includes “The health of all residents and the economy is connected to the health of the environment.” Add a visual showing this.
- Add a visual showing connections between the different chapters.
- Figures 20 and 21 could be easier to interpret. Consider using pie charts. Figure 20: move labels all outside. Figure 21: move Passenger vehicles to left side, use larger font to highlight it.
- Figure 24 could be easier to interpret. Show the difference between the 2 different growth centers and the 2 different industrial centers. Use similar graphics to show the other centers.
- Put these next to map of region showing where these different centers are.
- Figure 28 – the bottom section looks good…. The figure would be better if it showed the gaps:
  - The percent of people in each category and the percent of housing in each category.
  - The percent of each housing category we have now and the percent we anticipate needing in our region.

Regional Collaboration

Equity and Health Disparities (page 16)

- Add the following definition on “health disparity” after the sidebar on “equity”; and in the Glossary:
  - **Health Disparity**: A gap or difference in health status between different groups of people, including race, income, education and geographic location. This health difference is closely linked with social, economic, and/or environmental disadvantage. ([Healthy People 2020](https://www.healthypeople.gov/2020))

Regional Collaboration Policies (page 18)

- MPP-RC-1: Remove “federally recognized” before “tribes”.
- MPP-RC-3: Replace the existing policy with “Make reduction of health disparities and improvement of health outcomes across the region a priority when developing and prioritizing funding to implement regional, countrywide and local plans.”

Regional Collaboration Actions (page 20)

- RC-Action-2: Replace “through monitoring and periodic evaluation” with “through monitoring of performance metrics that track the 14 desirable outcomes; and periodic evaluation of strategy policies and actions.” See additional comments under “Implementation” Chapter.

Regional Growth Strategy

- Page 23, third paragraph, fourth bullet: Add “and match” between “balance” and “of jobs and housing”.

Housing, Displacement, and Jobs-Housing Balance (page 26)

- Section title: Add “and Match” after “Jobs-Housing Balance”.
- Add “cultural,” before “economic and physical displacement” in the third sentence.
- Replace the sentence “Jobs-housing balance compares the relative amount of housing and employment in an area, with an aim toward reducing long commute trips.” with “Jobs-housing balance and jobs-housing match
compare both “the relative amount of housing and employment” and “the price points of housing vs. job wages” in centers along high capacity transits, with an aim toward reducing long commute trips.”

Regional Growth Strategy Policies
- MPP-RGS-12 (page 45): Add “schools,” before “and”.

Regional Growth Strategy Actions
- RGS-Action-4: Replace “zoning” with “regulatory codes” to allow for form-based and, perhaps, performance-based codes.

Regional Actions
- Create a new Regional Action (page 45) to read: “Tracking Jobs-Housing Balance and Match: PSRC will monitor “job-housing match” in addition to “jobs-housing balance” in centers across the region, like regional growth centers, countywide centers, and other walkable mixed-use centers along high capacity transits, by tracking average housing price points vs. average job wages, such as the price to income ratio or affordable housing index.”

Environment
Environment Policies
- MPP-En-9 (page 55): Replace “Enhance” with “Support biophilic urban design principles, low-impact development, green roofs, and”.

Climate Change
First paragraph after the Goal statement (page 59):
- Add “health,” before “and equity” in the first sentence.
- Add a new paragraph after the first paragraph “Climate change influences human health in numerous ways. The health effects include increased respiratory and cardiovascular diseases, injuries and premature deaths related to extreme weather events, food- and water-borne illnesses and other infectious diseases, and threats to mental health. Vulnerable populations are more at risks due to their limited resources to cope with climate change impacts.”

Climate Change Policies
- Add a new policy (page 65) to read: “Set greenhouse gas emission targets to help catalyze reductions. Consider adopting Puget Sound Clean Air Agency’s targets.”
- Add a new policy (page 66) to read: “Address rising sea water by siting or relocating hazardous industries and essential public services away from the 500-year flood plain.”

Climate Change Actions
- Add a new action under Regional Actions (page 66): “PSRC will prepare and provide education materials and resources to assist vulnerable populations to address and cope with climate change, site-specific contamination, and other health hazards.”
Development Patterns
The topic of healthy communities is discussed in this chapter. Creating healthy communities should be a goal for the region. Even if this goal does not deserve a separate chapter to document the reasons and overarching policies for building healthy places, we strongly recommend giving “healthy communities” a higher profile in this chapter by:

- Renaming the chapter title (page 69) as “Development Patterns and Healthy Communities”
- Goal (page 69): Add “healthy,” before “walkable” in the goal statement; and replace “unique local character” with “unique character and local culture”.
- Page 69 the last sentence of the first paragraph: Add “healthy,” before “compact” to read “support healthy, compact, pedestrian-oriented development...”.
- Combine the “Building Urban Communities” section with the “Supporting Healthy Communities” section (from page 69-72) and re-title as “Building Healthy Communities: Supporting Human Health and Well-being”. This is in line with A Road Map to Washington’s Future calling for a new goal on “Human Health and Well-being” to be developed.
  - Move the first paragraph currently under Supporting Healthy Communities on page 72, which starts with “How residents live, work, and get around...” to become the first paragraph of the new combined section.
  - In the last sentence of this new first paragraph, add “and social interaction” after “physical activity”; and “for all” after the last word “accessible”.
  - Add the word “attainable” before “housing” in the first sentence of the new second paragraph.
  - First bullet on page 69: Add “improving social connections,” before “cutting air pollution”.
  - Add a new bullet on page 69: “Reduce commuting time.” (Refer to comments above regarding health impacts of commuting.)
  - Move the second paragraph currently under Supporting Healthy Communities on page 72, which starts with “Health is more than just the absence of diseases.” to insert between the second and the third paragraphs on page 70.

- Centers: Supporting Connections to Opportunity (page 74)
  - Regional Centers:
    - Add “except for ancillary retail uses that serve the basic needs of local workers” after “commercial uses” in the last second sentence of the last paragraph under this topic.
    - Replace “also” with “generally” in the last sentence of the last paragraph under this topic. This is because with the introduction of alternative regulatory tools, such as performance-based codes, sometimes limited residential uses can be compatible with certain non-hazardous industries which meet approved performance standards.

- It appears that the section on “Annexation and Incorporation” (page 79) is out of place in this chapter. Would this topic be better suited in the “Regional Growth Strategy” chapter? If so, transfer MPP-DP-26, MPP-DP-27 and MPP-DP-29 to RGS policies.

- Collaborating to Preserve and Enhances Important Uses
  - Innovative Techniques (page 81): Add a new sentence at the end of the paragraph: “Some cities have introduced form-based codes in their growth center plans to promote walkability in healthy mixed-use environments.”

- Development Patterns Policies (page 82): Rename this title as “Development Patterns and Healthy Communities Policies”
  - Add two new policies in this chapter to support healthy communities:
    - Design complete neighborhoods around high-capacity transit stations and in mixed-use, compact urban communities offering walkable access to daily necessities and services.
Housing

- Add the following second paragraph after the Goal statement (page 91):
  “Housing affects our health in many ways. The affordability, location, and quality of housing have all been independently linked to health. Providing affordable housing close to jobs and fairly accessible to all income groups will reduce cost burdens for every household, improve our economy, support health, and improve quality of life. Poor quality housing and blighted neighborhoods diminish property values, increase crime, and erode the cohesiveness of our communities.”

- A Regional Challenge (page 91): Add “, complete,” after “healthy” in the third sentence of the first paragraph.

- Affordability (page 94):
  - Replace “is” with “and partnership with non-profit housing organizations are”
  - Replace the last sentence on page 94 to read: “Besides alternative housing, such as tiny homes and micro units, etc., Vision 2050 also encourages alternative homeownership opportunities, such as community land trusts and housing co-ops, etc., for low-income....”

- Focusing Housing Near Transit Options (page 95):
  The Health Department totally supports planning for housing, particularly affordable housing, and job growth in places served by high-capacity transit. However, focusing housing near transit cannot adequately ensure reduction in commuting and displacement prevention. Building affordable housing without matching the job wages in the proximity could result in an influx of people working in high-wage area to conveniently commute to other high-capacity transit centers where housing is much cheaper. Commuting costs not just the environment, but also our health and well-being.

- Displacement and Community Stability (page 95): Add a new last sentence to the first paragraph: “Once physical and economic displacements occur, the social and cultural composition of the neighborhood will be disrupted, thus affecting the cohesion and stability of a community, and the well-being of local residents and businesses.

- Jobs-Housing Balance (page 96): As discussed earlier, solely relying on jobs-housing ratio may not be sufficient to reduce the length and time of work-related commute. There’s still a need to match housing affordability with job wages in compact, mixed-use centers. For this reason, we suggest:
  - Changing the title of this section to read: “Jobs-Housing Balance and Match”.
  - Replace the first sentence with “Jobs-housing balance and match is a planning concept which advocates that the right amount and range of housing units be affordable to those with jobs nearby to reduce...”

- Housing Policies
  - MPP-H-4 (page 96): Add “and partnerships with non-profit housing organizations” to the end of the sentence.

Explore other regulatory tools, such as form-based codes and performance-based codes, to support walkability and encourage healthy retail businesses in mixed-use areas.

- MPP-DP-4 (page 83): Add “providing affordable housing for workers nearby” after “mixed use areas”.
- MPP-DP-7 (page 83): Add “and meaningful” after “inclusive”; and add “, with special attention paid to vulnerable populations.” at the end of the sentence.
- MPP-DP-8 (page 83): Add “support local culture,” after “enhance quality of life”.
- MPP-DP-15 (page 84): Replace “Incorporate provisions addressing” with “Address and integrate”; and add “practices” after “local planning”.
- MPP-DP-30 (page 85): Add “and industrial areas” at the end of the sentence.
- MPP-DP-34 (page 85): Add “, including health” at the end of the sentence.
- MPP-DP-51 (page 87): Replace “Address” with “Include”.
- MPP-DP-52 (page 87): Add “in a timely manner” after the sentence.
Draft Vision 2050

Staff Comments

- MPP-H-7 (page 96): Add “that match the job wages nearby” after “affordable units”.
- MPP-H-8 (page 97): Replace “long-term affordable housing options in walking distance...” to “long-term stable and adequate housing affordable to workers nearby within walking distance...”
- MPP-H-9 (page 97): Replace the last phrase to read: “that allows more people of diverse backgrounds to live in and integrate into neighborhoods across the region.”
- MPP-H-12 (page 97): Add “community development” before “strategies” in the last sentence.

- Housing Actions:
  - Regional Actions:
    - H-Action-1 Regional Housing Strategy (page 97):
      - Second bullet: Add “and match” after “jobs-housing balance”.
      - Add a bullet: “Establish meaningful affordable housing targets, with price points that correspond to the projected job wages, for regional growth centers and areas around transit centers.”
      - Add a bullet: “Work with the local communities to develop meaningful anti-displacement strategies, including community development tools and practices.”
      - Add a bullet: “Identification of meaningful metrics to operationalize the “jobs-housing match” concept.
    - Add a new regional action on “Affordable Housing Tools”: Strengthen the Affordable Housing tools under the “Planning for the Whole Communities Toolkit” to include such tools as community development corporations, rental housing safety program, housing financing, tax incentives, land value capture, and continuum of housing (including tiny homes, modular and micro-units, etc.) to meet the needs of all walks of life and foster inter-generational neighborhoods.
  - Local Actions:
    - H-Action-4: Add “meet the needs of workers living nearby and before “support updates to local comprehensive plans.”

Economy

- Goal statement (page 101): Add “and their health” after “investing in all people”.
- Page 101 first paragraph after the goal statement: Add “enhance community assets,” after “protect the environment”.
- Page 101 third paragraph:
  - Add two sentences as an introduction to this paragraph: “Our health and economy are mutually-supportive. While the economy relies on a healthy workforce; people’s health depends on a thriving economy to provide personal financial stability to afford a high quality of life.”
  - Add “and access health care” after “to provide for their families”.
- Page 101, fourth paragraph: Add “equitable” before “job creation” in the last sentence.
- Economic Opportunity (page 104): Add “, developing social capital and community assets” after “skills-training programs”.
- Economic Policies:
  - MPP-EC-18 (page 107): Add “and match” after “balance”.
  - MPP-EC-22 (page 107): The latter part of this policy sounds like segregating MIC from other uses. However, there’s an opportunity to explore alternative regulatory codes, such as performance-based codes, to allow appropriate types of residential use in proximity to non-hazardous industries. In the long run, the region will benefit from being creative in helping workers find affordable housing closer to their workplace, including MICs.
Transportation

- Third paragraph (page 112): Add “human health,” before “economic development” in the last sentence.
- Supporting People (page 115)
  - Rename the title of this section as “Supporting People and Human Health”
  - First paragraph:
    - Add a new sentence before the last sentence: “Long commuting affects our physical health and social-emotional well-being.”
    - Add “and match” after “jobs-housing balance” at the end of the last sentence.
  - Add a new sentence at the end of the second paragraph: “Efficient multimodal transportation systems provide opportunities for physical activity and social connection that can improve overall quality of life—both human health and neighborhood livability.”
- Page 115-117: Consider grouping the three sections “Supporting People and Human Health”, “Supporting the Economy” and “Protecting the Environment” together to signal how transportation advances the vision for the Vision and support the pillars of sustainable development. This means moving “Mobility and Accessibility” and “A Sustainable Transportation System” after “Protecting the Environment”.
- Transportation Policies:
  - MPP-T-5 (page 118): Add “human health” after “impacts to”; and replace “human health” at the end of the sentence with “health and equity”.
  - MPP-T-8 (page 118): Add “health disparity and before “environmental impacts” in the last sentence.
  - MPP-T-9 (page 118): Add “prioritize” before “projects”.
  - MPP-T-10 (page 119): Add “and apply universal design principles” after “ensure mobility choices”.
  - MPP-T-15 (page 119): Add “equitable” before “development”.
  - MPP-T-23 (page 120): Add “for all” after “living conditions”.
  - Add MPP-T-35 Promote coordination among transportation providers within our region to improve connectivity around the region, to meet the needs of all users throughout our counties and our region. Include transportation providers in King, Kitsap, Pierce, Snohomish, Thurston and other counties for a more robust regional transportation system.
- Transportation Actions:
  - T-Action-1 Regional Transportation Plan (page 121):
    - Adopt a health lens when updating Regional Transportation Plan by:
      - Connecting transportation with affordable housing.
      - Addressing health disparity across the region.
    - Add “funded,” before “maintained” in the third sentence. Explore land value capture tools to fund high capacity transit and affordable housing.
  - T-Action-2 Transportation Technology and Changing Mobility (page 122):
    - Add “including the health impacts of vulnerable populations,” after “impacts” in the first sentence.

Public Services

- Goal statement (page 125): Add “timely,” before “coordinated”.
- Third paragraph (page 125):
  - Replace the first sentence with “The health of the region’s residents depends on whether they have fair and timely access to high-quality, affordable, and conveniently-located public services.”
  - Add “, particularly in underserved areas,” before “such as water…” in the last second sentence.
- Capital Facility Siting (page 127):
Draft Vision 2050

Staff Comments

- Second paragraph: Add “building social capital, and” before “creating a sense of community” in the second sentence.
- School Siting: Replace “cornerstones” with “hubs and gathering places”.
- Last paragraph: Add “adjusting service priorities and” before “not siting facilities...” in the last sentence.

- Public Services Policies:
  - MPP-PS-2 (page 128): Add a sentence to this policy: “Prioritize investments to address disparities.”
  - MPP-PS-18 (page 130): Replace the existing policy with: “Co-locate community facilities, health and human services in centers and near transit facilities for all to access services conveniently.”
  - Add a new policy: “Consider climate change, economic and health impacts when siting and building essential public services and facilities.”

Implementation

- Other Regional Actions (page 137): Replace “racial and social equity” with “racial, social and health equity”.
  - “Health Equity” is defined as “The attainment of the highest level of health for all people. (Healthy People 2020).
- Add a new section on “Performance Management” prior to the section on “Amendments to Vision 2050” (page 138) to read:
  - “Performance Management
  PSRC works collaboratively with counties, cities, towns and other agencies to develop meaningful performance metrics to monitor the progress of achieving the vision, goals and outcomes of Vision 2050. PSRC will publish performance data to inform major amendments and updates to Vision 2050.”

Glossary

- Add definitions included in this document to glossary:
  - Health Disparity: A gap or difference in health status between different groups of people, including race, income, education and geographic location. This health difference is closely linked with social, economic, and/or environmental disadvantage. (Healthy People 2020)
  - Health Equity: The attainment of the highest level of health for all people. (Healthy People 2020).
  - Quality of Life: A broad multi-dimensional concept comprised of two domains—“individual health and well-being”, and “neighborhood livability”. The first domain includes physical health and social, emotional and mental well-being. The second relates to those rich opportunities in our neighborhoods affording one to fully enjoy life, such as access to living wage jobs, affordable housing, reliable transit, good schools, safe parks and protected natural areas, etc. (CDC)

Thank you for PSRC staff’s hard work on making healthier places to live, learn, work and play around our region. We look forward to collaborating with PSRC and many others to advance Vision 2050’s vision. Please contact Amy Pow or Marianne Seifert with any questions at apow@tpchd.org or mseifert@tpchd.org.
Hester Serebin, Policy Director of Transportation Choices Coalition, provided verbal comments at the September 5 Growth Management Policy Board Public Hearing. Ms. Serebin noted that her organization has been working with a coalition of organizations to collectively suggest recommendations for VISION 2050. She noted that written comments will be provided, but she wanted to share the following changes to VISION 2050 during the public hearing:

- Reduce rural and urban unincorporated growth to reduce traffic congestion and greenhouse gas emissions
- Have regional geographies be consistent across all counties
- PSRC should develop an anti-displacement toolkit that would support jurisdictions in developing anti-displacement plans, in consultation with affected communities
- Commit to greenhouse gas targets and reduction of greenhouse gas emissions in an equitable manner through comprehensive plan certification and transportation funding
- Incorporate air transportation planning into climate change planning
- Review land use plans to account for climate impacts such as sea level rise, flooding, wildfires, etc.
- Develop a dashboard to track progress on regional outcomes
- The use of regional health indicators to target pollution reducing projects and lower health disparities
- Improve environmental justice analysis
- Create a plan for resourced environmental justice advisory group that can help create a regional equity strategy
- Strengthen commitments to open space
September 16, 2019  
To: Growth Management Policy Board  
Re: Vision 2050 Draft Plan

Thank you for the opportunity to comment on the Vision 2050 draft plan. Collectively our groups are looking to Vision 2050 to lead with racial and social equity; to emphasize policies on health, equity, and the environment; to focus on action items and implementation of VISION; and to use specific targets and performance metrics to measure success and add accountability. With that frame in mind, we offer the following comments.

General comments

- **Reduce rural and urban unincorporated growth.** We continue to oppose additional rural and urban unincorporated growth (beyond allocations in the original Transit Focused Growth alternative) in areas lacking high capacity transit, which tends to strain services. Rural development in particular increases the distance between housing and jobs, exacerbates traffic, increases the carbon footprint of regional growth, and is not a cost-effective development pattern for providing supportive infrastructure or services to a growing population. It also has an oversized impact on open space consumption, worsens the Conversion of Ecologically Important Lands critical for Puget Sound recovery, promotes the conversion of land identified as at-risk and in need of conservation by PSRC in its Regional Open Space Conservation Plan, and negatively impacts endangered salmon and orca recovery efforts through habitat loss and degradation.

- **Keep geographies consistent.** The adopted Regional Growth Strategy and geographies definitions should be consistent with the Transit Focused Growth alternative across all four counties.
### Proposed plan amendments

<table>
<thead>
<tr>
<th>Draft Plan section</th>
<th>Proposed amendment</th>
<th>Rationale/explanation/details</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Regional Growth Strategy</strong></td>
<td>Promote transit-oriented, walkable, bikeable, urban villages in suburban areas through redevelopment of underused or unused greyfield and brownfield sites; reuse of vacant buildings; mixed use zoning which provides for a range of housing sizes; improved connectivity through the addition of small blocks and complete street network; connecting the regional trails network; centering active transportation and bus rapid transit in the street network; daylighting of streams and regreening of wetlands and other areas.</td>
<td></td>
</tr>
<tr>
<td><strong>Displacement</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Housing Needs Assessment</td>
<td>PSRC should develop an analysis of regional housing needs reflecting the number of households in each income bracket and the number of anticipated new households in the region to demonstrate gaps in housing at those income levels.</td>
<td>We should be working to address both future needs and existing gaps. For example, there is a disproportionate gap in the supply of units affordable to lower income levels (below 50% AMI).</td>
</tr>
<tr>
<td>MPP-H-7</td>
<td><strong>Policy:</strong> Expand the supply and range of affordable housing and other equitable development at densities to maximize the benefits of transit investments in growth centers and station areas throughout the region.</td>
<td>Clarifies the intent to center equitable TOD in the policy rather than just density.</td>
</tr>
<tr>
<td>MPP-H-12</td>
<td><strong>Policy:</strong> Identify potential physical, economic, and cultural displacement of low-income households and marginalized populations that may result from</td>
<td>Jurisdictions need to support communities through sound and proactive</td>
</tr>
</tbody>
</table>
planning, public investments, private redevelopment and market pressure. Use a range of strategies to mitigate displacement impacts to the extent feasible.

**Regional Action:** Develop a toolkit for anti-displacement policies to mitigate and prevent displacement. Without proactive action from government to create and foster the conditions for community stability and economic mobility, marginalized populations will continue to be increasingly at risk of being displaced from their homes, leading to housing insecurity. Leverage PSRC’s displacement analysis to model high risk areas and policies that can be used per pattern.

- Adopt displacement risk assessments as part of local planning and capital/infrastructure investments.
- Develop local and regional funds to mitigate and prevent displacement.
- Strategies to preserve cultural and community institutions as well as small businesses.
- Requiring 1:1 replacement of units affordable to households earning less than 60% AMI.
- Community Preference Policies for areas with high risk of displacement to give low income residents a greater chance to live in public-funded affordable housing built in their communities, while ensuring that jurisdictions comply with fair housing laws.
- Encourage jurisdictions to implement appropriate and effective Inclusionary Zoning tools. New affordable housing production is an anti-displacement tool if
- Funding for tenant counseling, homeowner education and landlord education to combat displacement and increase access to housing.
- Encourage jurisdictions to allow the development of accessory dwelling units and the compact subdivision of residential lots in urban areas while prohibiting "McMansion"-style development.
- Adopt local tenant protections for just cause evictions and source of income discrimination.
- Support tenant protections and rent regulation policies at the state legislature.
- Encourage jurisdictions to form renters commissions.

**Policy:** Jurisdictions shall prepare residential and commercial affordability and anti-displacement targets and anti-displacement plans through proactive mixed use zoning policies, consulting the PSRC toolkit and in conjunction with engagement with the populations identified who are most likely to be displaced (both residents and immigrant and refugee small business owners) in order to be eligible for transportation funding.

Provides jurisdictions the circumstances under which displacement tools should be explored, and the regulatory incentive for using them.

**Action:** PSRC should work to identify a pool of funds for use by jurisdictions to a) develop anti-displacement plans, and b) help people financially to stay in place or to return to their communities, through direct subsidies. Using the City of Seattle’s Equitable Development Fund as a model, PSRC could fund organizations doing anti-displacement work around the region to develop locally-appropriate and community-driven solutions.
Analysis of the draft Regional Growth Strategy has shown that many areas with current and future high-capacity transit investments have higher displacement risk than other parts of the region. In the coming decades, Cities and counties will need to act swiftly to mitigate consideration of displacement risk and support inclusive growth near transit so both existing and future residents are able to benefit from the opportunities these major transit investments can provide.

Many residents of Puget Sound have already been displaced, and many more are being displaced every day. Our elected leaders need to take action now to help mitigate and prevent further displacement.

**Climate**

| Climate Change Goal | The region will substantially reduce emissions of greenhouse gases that contribute to climate change in accordance with the following targets:
|                    | · 50% below 1990 levels by 2030  
|                    | · 80% below 1990 levels by 2050 | VISION 2050 should commit to the same targets as the PSCAA and establish a carbon budget for the region. This will allow PSRC to measure future emissions against these targets and make policy adjustments accordingly. Transparency about our region’s carbon emissions over time is foundational to adequately reducing emissions. |
| CC-Action-X        | **Decision Making:** PSRC will only certify comprehensive plans and select transportation funding projects through the Regional Transportation Plan and Project Selection processes that align with greenhouse gas emission reduction targets, as determined by analysis of emissions reductions for each sector. | PSRC will be unable to substantially reduce greenhouse gas emissions unless it employs such an analysis in its decision making. VISION 2050 should include a wedge analysis of necessary greenhouse gas emissions reductions (see Metro Vancouver’s Climate 2050 plan as an example – page 21) in order to accurately gauge progress. |
| CC-Action-X        | **Monitoring and Evaluation:** Every two years, in accordance with evaluations of the Greenhouse Gas Strategy (CC-Action-1) PSRC will evaluate whether occurring transportation and growth trends are aligned with greenhouse gas emissions reductions targets and adjust decision making processes accordingly. | An iterative process is necessary to evaluate whether our region is on track to meet greenhouse gas emissions reductions goals and, with this knowledge, PSRC will be able to adjust its decision making accordingly. |
| CC-Action-X | **Equity:** Ensure the new and forthcoming Regional Equity Strategy, as it is developed, informs the Greenhouse Gas Strategy and resilience actions to ensure that those who are disproportionately harmed by climate change will be centered in mitigation and adaptation strategies. | Ensures that PSRC’s Greenhouse Gas Strategy is influenced by the Regional Equity Strategy since both need to be considered simultaneously in order to be effective. |
| CC-Action-1 | **Greenhouse Gas Strategy:** PSRC will advance the implementation of the region’s Greenhouse Gas Strategy, including future versions, to equitably achieve meaningful reductions of its greenhouse gas emissions reduction targets throughout the region from transportation, land use and development. Regular evaluation and monitoring will occur as part of the development of the Regional Transportation Plan every four years with an interim evaluation every two years. | Amended to reflect adoption of greenhouse gas emissions targets and to account for the proposed Monitoring and Evaluation amendment which provides for more frequent adjustments, which will likely be necessary in order to hit targets. |
| CC-Action 3 | **Emission Reduction:** Cities and counties will incorporate emission reduction policies and activities that are commensurate with greenhouse gas reduction targets in their comprehensive planning. By following the Regional Growth Strategy, which we identify and support as the Transit Focused Growth Strategy for all four counties (as represented in the 2019 SEPA Draft SEIS issued earlier this year), jurisdictions can achieve emission reduction by providing multimodal transportation choices, promoting low emission buildings, and fostering a transition to a cleaner transportation system and built environments. | Make sure policies and activities align with targets. |
| MPP-CC-1 | **Action:** Update land use plans for climate adaptation and resilience. After reviewing and updating hazard zones based on climate impacts due to sea level rise, flooding, wildfire hazards, urban heat, and more, review land use and comprehensive plans to account for necessary changes to zoning, allowable development, multimodal emergency and evacuation routes, and more. | As hazard areas increase in locations and scale, greater mitigation and resilience will need to be built into the system in addition to limiting development in hazard prone areas and building active transportation routes for evacuation or |

Transportation Choices, et al VISION 2050
| New Action | Incorporate air transportation planning. Formalize an air transportation role and capacity at PSRC similar to the current land transportation function to allow for integrated, complementary and creative land and aviation transportation planning. | Current air transportation planning is not well integrated into VISION or RTP. Air travel contributes significantly to GHG emissions as well as local noise and air pollution. |
| New Action | Develop Holistic Climate Strategy. Move the climate strategy out of regional transportation plan and into VISION to reflect the holistic approach that PSRC must consider across transportation (land and air), land use, and economic development. |

### Regional Open Space Strategy

| MPP-RGS-4 | Accommodate the region's growth first and foremost in the urban growth area. Ensure that development in rural areas is consistent with the regional vision and the goals of the Regional Open Space Conservation Plan | There is currently tension between rural growth proposals and goals identified as priorities for conservation in the ROSCP. |
| RGS-Action-4 (Regional) | **Rural Growth:** PSRC members and stakeholders, will use local, regional and state-wide conservation programs to reduce development pressure in rural and resource areas, to facilitate regional Transfer of Development Rights, and to explore additional techniques to conserve valuable open space areas, including Purchase of Development Rights and open space markets. | Revised for stronger, more active language. |
| MPP-En-12 | Identify, preserve, and enhance significant regional open space networks and linkages across jurisdictional boundaries through implementation and update of the Regional Open Space Conservation Plan. PSRC should periodically measure impacts from VISION 2050 implementation against goals and recommendations identified in the Regional Open Space Conservation Plan. | Open space protection is core to the goals of GMA and VISION; however, there's no link or measurement between plans and actions. We need to understand land use patterns as they relate to open space goals to bring this to the fore. |
| En-Action-1  | Open Space Planning: PSRC will work with member jurisdictions, resource agencies, tribes, and interest groups to implement conservation, restoration, stewardship, and other recommendations in the Regional Open Space Conservation Plan. PSRC will review and comment on alignment with the Regional Open Space Conservation Plan during the comprehensive plan certification process. On a periodic basis, evaluate and update the Regional Open Space Conservation Plan. | Requiring review and comment (though not a requirement) prioritizes open space planning as an aspect of comprehensive planning. For example, are jurisdictions:  
- Providing open space in areas identified for new development, especially in those with higher racial and social inequities  
- Connecting regional trail networks  
- Supporting rural conservation priorities by using identified tools like TDR |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>En-Action-4</td>
<td>Local Open Space Planning: In the next periodic update to the comprehensive plan, counties and cities will create goals and policies that address local open space conservation and access needs identified in the Regional Open Space Conservation Plan, prioritizing areas with higher racial and social inequities and rural and resource land facing development pressure.</td>
<td>Prioritizes open space planning around specific goals within the comp plan process</td>
</tr>
<tr>
<td>New Policies &amp; Goals</td>
<td>Regional Trails Network: Given the role of trails as open space, recreation, and transportation corridors, Vision 2050 should incorporate goals and policies that ensure jurisdictions have the funding and support required to connect trails into a usable four-county network.</td>
<td>Connecting regional trails across central Puget Sound region will improve health, mobility, quality of life, and access. In 2018, PSRC developed a Regional Open Space Conservation Plan that &quot;identifies a need for 300 miles of regional trails to better connect people to the open space network and for more than 40 new park opportunities to provide equitable, walkable access to urban open space.&quot; While this plan is a great start, additional action plans are needed to deliver the connected trails network. Ideally, this will</td>
</tr>
</tbody>
</table>
be done working in tandem with the new four-county regional trails coalition to identify high-need areas and priority connections, and match those projects with suitable funding opportunities.

**Public Health**

| New Action & Policy | Action: Develop a public-facing dashboard for VISION to understand whether the region is meeting its goals, so that jurisdictions can periodically understand progress and adjust as needed. Should include thresholds, ceilings for displacement, climate, health to measure progress toward racial and social disparity reduction.  
Action: Develop a process by which if regional goals are not met, policy updates would be triggered and more stringent requirements for comprehensive plans and project funding would be adopted. | Here’s a draft set of Healthy Community Planning Measures as a start. This may be most practically framed via a Targeted Universalism approach, which PSRC and the board should discuss. |
| Environmental Justice Analysis | Action: Develop baseline environmental justice analysis. For all outcomes (e.g. air quality, access to opportunity, etc), including total and disaggregated data (to county and municipal levels) for baseline, incremental change (across each RGS), end result (across each RGS), and any relevant targets for that outcome (e.g., regional GHG emissions targets).  
Analysis should include an overlay of the statewide health disparities map for the four county census tracts. | This has implications for how we understand the measures necessary not only to meet regional environmental targets, but also blurs our understanding of ongoing reality that communities of color, low-income communities, refugees, immigrants, and indigenous communities are already living with disproportionate harm and adverse effects from historic and ongoing systemic oppression. |
<p>| New Action | Action: Update project selection process to incorporate the data from the statewide health disparities map in order to steer pollution reducing projects toward priority communities and prevent or reverse emissions in areas with poor health outcomes. Requiring a health impact analysis for any vehicle capacity expansion project could be an additional way to better understand project impacts. | |</p>
<table>
<thead>
<tr>
<th><strong>Water quality</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MPP-T-32</strong></td>
</tr>
<tr>
<td><strong>T-Action-6</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Institutionalizing equity</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>New RC-Action</strong></td>
</tr>
<tr>
<td><strong>New RC-Action</strong></td>
</tr>
<tr>
<td><strong>A Vision for 2050</strong></td>
</tr>
</tbody>
</table>

**Studies** have shown that coho spawner mortality is closely and positively correlated with the relative proportion of local roads and impervious surfaces within a basin.
**Action:** As part of the Regional Equity Strategy, PSRC shall develop an equity impact tool for evaluating policies, processes, and PSRC board and work decisions.

Thank you for considering these comments, including policies and actions, regarding the Vision 2050 draft plan. We look forward to continued engagement as the process moves forward.

Sincerely,

Cascade Bicycle Club  
Climate Solutions  
Forterra  
Futurewise  
Housing Development Consortium  
OneAmerica  
Puget Sound Sage  
The Nature Conservancy  
The Wilderness Society  
Transportation Choices Coalition  
Washington Environmental Council
September 6, 2019

Puget Sound Regional Council
Attn. Vision 2050
1011 Western Avenue, Suite 500
Seattle, WA 98104

Submitted via email: Vision2050@psrc.org

RE: Comments on Vision 2050:

The Washington Association of Sewer and Water Districts (WASWD) is an association of more than one hundred water and sewer districts across the state. We represent our members in their efforts to provide essential utility services to homes and businesses at a reasonable cost, while protecting the natural environment. Nearly half of our member districts are located within the four-county Puget Sound Regional Council (PSRC) region.

We have had the opportunity to review PSRC’s draft Vision 2050 Plan, and want to express our general support for the document. The rapid growth affecting the region is creating challenges to its residents, to the environment, and to the agencies trying to serve them. We agree that focusing growth around transit centers and in urban-designated areas will minimize service costs while also mitigating the environmental impacts of such growth.

One policy we want to call out in particular is MPP-PS-7. As our communities see increasing housing densities, utility issues become more complex. Figuring out how to fit water, sewer, drainage, natural gas, power, and communication facilities into tighter spaces is a real and growing challenge. Determining which agency is best suited to serve a particular area raises many issues as well, so promoting coordination between agencies is a very positive step, and we support inclusion of this policy. We do suggest one small revision to it, however, to read as follows:

“Obtain urban services from cities or appropriate regional service providers. Encourage cities, counties, and special service districts, including sewer, water, and fire districts, to coordinate planning efforts, agree on optimal ways to provide efficient service, and move towards support consolidations that would improve service to the public.”

We offer this revision because there is no one size fits all answer for providing utility services that are in the best interest of the public.
MPP-PS-9 promotes the use of reclaimed water. We have no problem with that concept, but stress that it needs to be carried out through cooperation between water and wastewater agencies. Reclaimed water is a resource of varying economic value today, but one which might be very important in decades to come. Working cooperatively today will lay the groundwork for that future.

MPP-PS-20 and MPP-PS-24 speak to certain challenges to an ample and secure water supply. As we see increasing impacts from climate change, and the dwindling of water supplies elsewhere, the Puget Sound region will continue to experience in-migration of residents and businesses who are attracted to many aspects of our region. Among those is our water supply, but we need to take steps to protect it. Controlling growth near the key watersheds is an important factor. However, agencies need to be aware that not all water supplies are located in the foothills of the Cascades. A number of districts draw water from wells within suburban areas. Allowing such wellhead areas to become polluted would put additional pressure on the remainder of our water supply. For this reason, we suggest modifying MPP-En-10 to read as follows:

“Support and incentivize environmental stewardship on private and public lands to protect and enhance habitat, water quality, and other ecosystem services, including protection of watersheds and wellhead areas that are sources of the region’s drinking water supplies.”

The Plan speaks about the importance of annexation in providing urban services to areas within the urban core. It also recognizes some of the challenges that have largely stalled annexation efforts over the past decade or longer. Resolving these concerns will take a number of steps, including close coordination between a number of parties. We suggest that such efforts should include water and sewer districts. To that end, please consider amending MPP-DP-27 as follows:

“Support joint planning between cities, and counties and service providers to work cooperatively in planning for urban unincorporated areas to ensure an orderly transition to city governance, including efforts such as: (a) establishing urban development standards, (b) addressing service and infrastructure financing, and (c) transferring permitting authority.”

Also, please consider amending MPP-DP-29 as follows:

“Support the provision and coordination of urban services to unincorporated urban areas by the adjacent city or, where appropriate, by the county or an existing utility district as an interim approach.”
These comments also reflect the spirit of key reforms identified in the recently released “A Road Map To Washington’s Future Final Report,” prepared by the William D. Ruckelshaus Center. The report cites a lack of inclusion of utility districts as a problem in regional planning efforts. One of the Report’s recommendations is: “Integrate water and sewer districts, school districts, and port district planning into the GMA [Growth Management Act].” Clearly, urban growth does not happen without water and sewer service. Since districts play a large and vital role in that service, they should be involved in planning efforts.

Thank you for the opportunity to comment on the Vision 2050 Plan. We look forward to working with the PSRC and with cities and counties throughout the region in providing for a bright future for the residents and businesses that call this their home.

Sincerely,
Washington Association of Sewer & Water Districts

Judi Gladstone
Executive Director
September 16, 2019

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

Dear Mr. Mello:

Since the passage of the Growth Management Act in 1990, the Department of Commerce has been charged with overseeing its implementation. Commerce’s Growth Management Services unit works directly with cities, counties, and metropolitan planning organizations as they make growth management-related decisions for their jurisdictions, and provides technical assistance to ensure that these decisions and actions are consistent with the Act. As a partner with PSRC in implementing growth management in Washington, Commerce appreciates the opportunity to comment on Vision 2050, a plan shaping development in King, Pierce, Snohomish, and Kitsap counties for the next three decades and beyond. Overall, Commerce supports Vision 2050 as it provides a framework for growth management for the next thirty years. As an update and improvement to the current Vision 2040, Vision 2050 provides an opportunity to address emerging and ongoing challenges to effective growth management in the region.

Acknowledgement of Success

The extensive effort put into PSRC’s Vision 2050 is evident. PSRC’s current document, Vision 2040, has effectively led growth management of the Puget Sound metropolis in the current decade. While most cities nationwide have seen continued decrease in density, the Seattle metro has seen an increase. While most cities have seen a decline in public transit ridership, ridership in the Seattle metro has increased.

The Central Puget Sound region is fortunate to have in place the leadership of its metropolitan planning organization, the Puget Sound Regional Council, and to have the legal framework of the Growth Management Act to support regional planning activities. As many of the issues we face – economic, housing, environmental – cross county borders, a regional approach to growth management is necessary.

The Regional Growth Strategy and Regional Geographies

The regional growth strategy, focusing growth within designated urban areas and connecting these areas by transit, will contribute to the area’s social, economic, and environmental health in upcoming decades. Significantly, the regional growth strategy is, in general, consistent with the Growth Management Act.

Recognizing that several future transit stations will be located in urban unincorporated areas, PSRC’s new High-capacity Transit Communities (HTC) designation ensures that transit investments in these areas will be reinforced by supporting land use patterns.
Annexation and Incorporation

Vision 2050 appropriately identifies cities as the proper jurisdiction to provide urban services, and suggests annexation and incorporation of areas with significant populations in unincorporated areas. It also notes the challenges to annexation and incorporation.

Development/Growth in the Cities and Towns Geography

One concern is that Vision 2050 does not sufficiently account for the growth that is likely to occur in the region’s Cities and Towns. Availability of land for development in these cities and towns will make these areas attractive to growth.

Commerce has also observed that housing development in some of these cities and towns is occurring at less than urban densities. To ensure sufficient availability and affordability of housing, we recommend that policies requiring that housing within Cities and Towns be permitted at urban densities, consistent with the Growth Management Act be developed and included in Vision 2050. Such policies could be implemented through the multicounty planning policies. Achieving density targets should be a reviewable issue for certification.

Some of the cities and towns are able to currently accommodate more growth than the 6% target in Vision 2050. It is possible that growth pressures and demand for housing affordability may drive growth at rates higher than the target. In order to proactively manage this growth, the demand for housing brought about by regional growth pressure needs should be reflected in the regional growth strategy. The Buildable Lands reports, in particular, play a role in documenting capacity and play a part in growth allocations.

Access to Opportunity and Housing

One of the most significant issues facing the region is for the economic benefits of our healthy economy be shared broadly. This issue is especially acute when individuals and families have to deal with housing crisis.

PSRC has developed tools which map access to opportunity as well as displacement risk. We encourage development of additional tools and strategies to address the housing shortage within the region and bring housing stability to more people. Combined with forward thinking strategies that promote housing affordability, Vision 2050 can ensure that more people throughout the region live near living-wage jobs. Housing stability and diversity also supports long-term economic stability for individuals, families, and the regions. Commerce looks forward to cooperating with PSRC to develop strategies that will increase the development of housing at a lower cost.

Guidance for Aligning Growth Targets

First, Commerce emphasizes that PSRC’s involvement in cities’ and counties’ GMA comprehensive plan updates be early and continuous, so that PSRC’s certification of their plans is a smoother process.

In providing guidance for aligning growth targets, PSRC should also distinguish between what is required in the Growth Management Act and what is required by Vision 2050. Since past discussions and certification processes have been unclear about the definition of “targets”, Commerce suggests that any time the document references the Growth Management Act, it defaults to the terms used within the Act. When discussing GMA and population distribution by the Office of Financial Management (OFM) the correct term is “projections,” not targets, and where the counties are distributing the OFM projections, those final populations for each city are “allocations”.

With that said, PSRC is authorized to set targets within the multi-county planning policy process. Therefore, in many places within VISION 2050 “targets” is used appropriately, but the GMA does not require the setting of “targets”. The following are a few instances which should be changed.

On page 16: “Under the Growth Management Act, counties are required to work with their respective cities to establish growth targets allocations and adopt countywide planning policies.”

Page 23: “Under the Growth Management Act, counties, in consultation with cities, are responsible for adopting population and employment growth targets allocations.”

Page 39: “While local governments plan under the Growth Management Act and establish countywide growth targets allocations, there are other areas in the region that are not subject to the state and regional planning framework.”

Page 43 “The Growth Management Act requires counties and cities to, at a minimum accommodate 20-year projected growth targets allocations.”

Climate Change

Climate change requires regional leadership and action for both mitigation and adaptation planning. Commerce suggests two ways to strengthen Vision 2050 so that it more effectively addresses climate change. First, multimodal transportation is insufficiently addressed in the Climate Change chapter. Because multimodal transportation – transit, biking and walking - is one way for individuals to participate in the reduction of greenhouse gas emissions, it should be noted as such within the chapter. Second, while Vision 2050 sets target numbers for population and jobs, it is absent of targets for greenhouse gas emissions.

Military Installations and Other Planning Areas

Vision 2050 recognizes both the importance of working with military installations, and the challenge of doing so, as they are outside the bounds of the GMA. Commerce supports Vision’s discussion of compatible land uses around areas like military installations and industrial lands. Where Vision discusses encroachment, consider reflecting the mutual nature of impacts between proximate land uses and providing additional rationale for compatibility. For instance, encroachment concerns itself with preserving mission capabilities at a base, as is well supported by MPP-DP-48 which seeks to “protect military lands from encroachment” (p. 87).

Compatibility planning of military and civilian areas is also concerned with preserving civilian safety and quality of life by avoiding practices that attract more people to places where their exposure to military activities will increase. Where military-related encroachment is discussed, consider revisions that reflect the acknowledgment of "mutual benefits and potential for impacts between growth occurring within and outside installation boundaries" (p. 19).

Coordination with military installations and service branches may also offer significant opportunity to leverage existing programs and federal funding sources that can help protect threatened and endangered species, preserve working lands, support civilian-military compatibility, and advance PSRC’s regional open space goals. The Department of Defense funds environmental programs on installations and off-installation sites through partnership with local governments and conservation organizations. Consider including coordination with military installations and service branches within the context of regional environmental goals and policies. The following changes are suggested:

- En-Action-1: "PSRC will work with member jurisdictions, resource agencies, tribes, military installations and service branches, and interest groups to implement conservation, restoration, stewardship, and other recommendations in the Regional open Space Conservation Plan" (p. 57).
• Puget Sound Recovery: “Watersheds don't follow jurisdictional boundaries and require active collaboration between local governments, tribes, military installations, agencies, and other organizations” (p. 54).

Vision will also benefit from policy statements that set goals to identify the population data, data-sets, and analysis methods needed to include “Other Planning Areas” alongside their neighboring communities. We recommend Vision 2050 more clearly specify how assumptions about population and employment growth in military and tribal centers is integrated into the regional growth strategy. We also recommend the following change from page 24:

“Both Major Military Installations and Tribal Lands are recognized in the Regional Growth Strategy because of their unique importance to the region. However, neither type of place is allocated forecasted growth in the strategy because both plan outside of the Growth Management Act. Military installations are governed by the federal government and tribal lands are sovereign Native American nations. Tribal planning and military installation planning takes place outside the Growth Management Act, however these places are significant population sources that contribute to and are impacted by commute patterns and development in the region.”

Moving Forward

Puget Sound Regional Council’s Vision 2050 is an effective document to guide Puget Sound growth for the next thirty years and beyond. Throughout the past decade, the central Puget Sound area has seen exceptional growth in employment and population. The forecast for an additional 1.2 million jobs and 1.8 million residents over the next 30 years only heightens the extent to which organizing this growth within a limited geographic area is important. Vision 2050 shapes a region with a growth management plan that reaps the social, environmental, and economic benefits of linking transportation and land use planning.

In this letter, the Department of Commerce has identified a few ways in which Vision could be strengthened. Distinguishing between growth targets and allocations would clarify the certification process for county and city comprehensive plans. The leadership of PSRC is only strengthened when it works early on with counties and cities in the development of their comprehensive plans. And the crises of housing affordability and climate change require strong and immediate action.

Commerce looks forward to continuing to work with PSRC as it improves Vision 2050, and as PSRC develops and implements strategies to realize this Vision.

Sincerely,

[Signature]

Dave Andersen
Managing Director
Growth Management Services
Department of Commerce

---

September 16, 2019

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

ATTN: Department of Ecology Comments on the VISION 2050 Plan

Dear Puget Sound Regional Council:

Thank you for the opportunity to comment on the Draft VISION 2050 Plan for the Central Puget Sound Region (VISION 2050) and for considering our prior comments on the associated Supplemental Environmental Impact Statement (SEIS). Overall, the growth management scenario selected by the Puget Sound Regional Council (PSRC) Executive Board and Growth Management Policy Board articulated in VISION 2050 is consistent with Ecology’s environmental protection goals.

VISION 2050 outlines many policies and actions for accommodating a growing population over the next 30 years. VISION 2050 recognizes the relationship between development patterns and environmental protection. By focusing the majority of new growth in transit areas, VISION 2050 will help relieve development pressure on the region’s rural lands, natural resource lands, and open space. It will also minimize the carbon emissions from new residents to the region in alignment with Agency Strategic Priorities to (1) Reduce & Prepare for Climate Impacts, (2) Protect & Restore Puget Sound, and Agency Goals to: (1) Prevent Pollution and (2) Promote Healthy Communities and Natural Resources.

The Department of Ecology (Ecology) recognizes the need to use such “smart growth” concepts that will allow for economic development while protecting the environment that supports our quality of life. Meanwhile, growth in rural areas and far from transit and centers will result in increased traffic and carbon emissions, while displacing habitat, increasing impervious surfaces, and deteriorating our watersheds. The interconnected nature and benefits of VISION 2050’s principles, policies, and actions articulated support and align with many of our agency objectives.

Attached you will find detailed comments from several of our programs. Please contact the listed staff member directly if you have questions or need clarification. Ecology looks forward to continuing to engage with the PSRC and the other resource agencies as VISION 2050 is adopted and implemented.
The Climate Change section on page 59 provides the reader with a distribution of greenhouse gas emissions in the Puget Sound region (Figure 20). The data indicates that the largest sources of emissions are from transportation and electricity from the commercial and residential sectors. This information is followed by a brief discussion of the Four-Part Greenhouse Gas Strategy, a strategy emphasized throughout the document. It would be helpful if this was qualified as a Transportation Four-Part Greenhouse Gas Strategy where the focus is on:

1) **Land use** such as transit-oriented development projects,
2) **User fees** to emphasize travel behavior away from single occupancy vehicles,
3) **Transportation choices** to plan for mobility alternatives to the automobile and
4) **Technologies** that offer reduced emissions such as electric vehicles.

While the Transportation Four Part Greenhouse Gas Strategy is important, VISION 2050 should also emphasize the important role of clean energy, specifically electricity, to the greenhouse gas reductions goals of the Puget Sound region. Recently passed SB 5116 mandates for Washington State carbon neutral electricity by 2045. As indicated in VISION 2050, in the Puget Sound region, electricity from commercial and residential sectors is a large contributor of greenhouse gas (GHG) emissions. Therefore, planning initiatives that introduce carbon neutral electricity for both fleet electrification projects and building energy efficiency is essential for meeting the region’s GHG reduction goal. Most likely this is already a strategy yet may not be reflected in the GHG emissions data if the emissions from electricity were estimated using the NWPP eGrid emission factor.

On the issue of climate resilience, VISION 2050 states CC-Action 2 “Resilience and Climate Preparedness” as a regional action yet the vulnerabilities and risks of climate change may be very local. We suggest that, in addition to CC-Action 3 “Emission Reduction”, Local Action should also include Resilience and Climate Preparedness. Some examples include, recent sea level rise considerations on Vashon Island (King County, 2016) or urban heat island impacts on elderly populations and mobility access to cooling stations (Kesslen, 2019) (Lo, 2019) (United States Environmental Protection Agency, 2016).

Ecology’s Shorelands and Environmental Assistance program (SEA) review of VISION 2050 focused on the elements of the plan related to supporting community conservation efforts for shorelines, wetlands, floodplains, and watersheds throughout the state. PSRC has identified a suite of policies that help to address the many challenges the region is facing. VISION 2050 contains a number of policies related to protection and restoration of habitat, shorelines, and other open spaces, which help advance our program objectives. VISION 2050 updates these to include new information and the most current thinking on environmental protection. Below are a few policies particularly aligned to the SEA program’s mission in supporting community
conservation efforts through partnerships to protect shorelines, reduce flood risks and protect/restore important wetland and riverine habitats.

**Policy MPP-En-9** directs the region to “Enhance urban tree canopy to support community resilience, mitigate urban heat, manage stormwater, conserve energy, improve mental and physical health, and strength economic prosperity.” **Policy MPP-En-13** is complementary – “Preserve and restore native vegetation and tree canopy, especially where it protects habitat and contributes to overall ecological function.” These policies recognize the many crucial benefits that the urban tree canopy provides to the region and its residents. With a growing population, preserving and enhancing tree canopy will be essential to maintaining the region’s quality of life, biodiversity, and perhaps most importantly, to the region’s resiliency in the face of climate change.

**Policy MPP-En-10** (“Support and incentivize environmental stewardship on private and public lands to protect and enhance habitat, water quality, and other ecosystem services”) recognizes the important role that land stewardship plays in ensuring the region’s open spaces remain healthy and are able to continue providing ecological benefits to the region. Many public and private land managers want to do what’s best for their property – providing education, support, and incentives can help them with existing barriers to better stewardship. Establishing strong partnerships among organizations, local jurisdictions, and land managers will be key to advancing this policy.

**Policy MPP-En-12** directs the region to implement and update the Regional Open Space Conservation Plan. This plan takes a watershed approach to identifying important open spaces in the region and identifies a number of important strategies for maintaining the region’s open spaces. Our review of the science has found that viewing specific wetlands, floodplains, and habitat within the context of both the site and watershed scale is crucial for fully capturing the important functions these open spaces provide. Implementation of the Open Space plans appear to align with our program objectives to properly manage and increase protection of shorelines, floodplains, and wetlands; to reduce flood risks and restore habitat along major rivers, and to increase public access and enjoyment of shorelines.

**Policy MPP-En-16** (“Preserve and enhance habitat to support healthy wildlife and accelerate the recovery of salmon, orca, and other threatened and endangered species.”) is directly aligned with the Governor’s orca recovery goals. The Orca Task Force recommends that salmon populations be restored through habitat acquisition and restoration. This policy helps to implement that recommendation.

**WATER QUALITY PROGRAM**
Karen Dinicola, (360) 407-6550, [karen.dinicola@ecy.wa.gov](mailto:karen.dinicola@ecy.wa.gov)

Ecology’s Water Quality Program (WQP) review of VISION 2050 focused on the planning policies and implementation approaches for the environmental components of the plan related to water quality protection and improvement. Many of the policies and actions articulated throughout VISION 2050 (Keeping the region moving – Restoring Puget Sound health –
Protecting open spaces – Focusing growth in centers and near transit) align with our objectives. Work we are doing here in WQP supports VISION 2050 policies and actions, and VISION 2050 in turn supports our work, in the following ways:

Protecting stream health and Puget Sound
We request a contextual edit to the statement on p. 53 that “Stormwater pollution and changes in the hydrology of runoff patterns are the biggest threats to Puget Sound water quality. Contamination of aquifers, low stream flows and excess nutrients and pollutants from sources such as wastewater treatment plants, agriculture and lawn runoff, leaky septic tanks, and polluted stormwater are other concerns.” The simplest edit would be to state that stormwater pollution and changes in hydrology are “among” the biggest threats.

The science is clear that wastewater treatment plants (WWTPs) are the biggest source of nutrient pollution to Puget Sound, and it is likely that they also pass through most of the contaminants of emerging concern including pharmaceuticals and many personal care product ingredients. WQP is currently engaging WWTP operators in addressing those problems. VISION 2050 appropriately asks jurisdictions to ensure that sufficient sewage treatment capacity is available as the region grows. Some jurisdictions may wish to consider adding satellite treatment plants and/or reclaimed water facilities to reduce the loadings to their main WWTPs.

It would also be helpful to distinguish managed stormwater from unmanaged stormwater. Most of the local jurisdictions in the PSRC counties have made substantial investments and improvements in their approaches to stormwater management over the past 10-15 years. New and old areas of development present different stormwater infrastructure challenges. Widespread application of treatment technologies, basic operation and maintenance activities, and enhanced efforts to identify and eliminate non-stormwater discharges through the Municipal Separate Storm Sewer (MS4) permits are all helping reduce stormwater pollution and hydrologic impacts.

VISION 2050 goals to enhance and preserve tree canopy and native vegetation are aligned with scientific findings that watershed canopy supports healthy instream biological communities. These policies complement required permit actions and other objectives of WQP to protect and improve water quality. The tree canopy helps to reduce harmful erosive flows by intercepting rainfall and increasing evapotranspiration, and the healthy soils in and around root zones provide biologically based treatment that reduces pollutants in the water.

Other policies in VISION 2050 have additional water quality benefits. For example, reducing vehicle emissions and having a cleaner overall transportation system not only achieves climate change goals but also reduces stormwater pollution. And land use patterns that lessen the need for driving will likely help preserve high quality stream habitat in outlying areas.

Synergy with MS4 permit requirements
MS4 permits issued to most of the jurisdictions in the PSRC planning area provide a tool for local governments to build successful stormwater management programs. Overall, VISION 2050 articulates policies and actions that support and encourage municipalities to go beyond the baseline framework established in the MS4 permits. The region needs to create and sustain new
opportunities and initiatives outside of the permit structure to accelerate the investment in and pace of protection of vulnerable water resources and retrofitting of existing infrastructure to improve water quality and accommodate expected increases in runoff quantity with climate change.

More specifically, VISION 2050 and the 2019 MS4 permits that Ecology issues under the Clean Water Act envision similar water quality benefits of green infrastructure. The MS4 permits require, among other stormwater management approaches:

- Removal of local jurisdiction barriers to implementation of Low Impact Development (LID) practices including bioretention and other green infrastructure techniques in new development and redevelopment projects. This applies to their codes, plan review policies, and other means of regulating development in their jurisdictions.
- Regional studies of the effectiveness of bioretention and other approaches. These findings support widespread implementation of LID and green infrastructure techniques.

VISION 2050’s oversight of countywide planning efforts is also poised to complement the MS4 permits. A new MS4 permit component requires planning for stormwater infrastructure retrofits and other targeted stormwater management activities to protect and/or improve water quality in high priority receiving waters. Jurisdictions are encouraged to identify land use planning, code changes, and other actions for implementation as water quality protection measures. Such measures will be particularly effective in the counties and in some cities where more undeveloped land exists. Watershed-based environmental strategies can provide a nexus for coordination among local jurisdictions and countywide planning groups.

The MS4 permits also focus on development within designated urban growth areas, where most stormwater impacts are occurring. VISION 2050 complements the MS4 permit requirements with its emphasis on protecting open spaces. The assistance and oversight PSRC envisions for countywide planning in the next several years can support MS4 permittees’ successful implementation of not only the planning but the actions needed to improve stormwater infrastructure to protect water quality.

The MS4 permits encourage coordinated planning but each jurisdiction can create their own plan. Planning will be most meaningful if “Counties and cities, together with other jurisdictions in the watershed, will participate in watershed planning to integrate land use, transportation, stormwater, and related disciplines across the watershed to improve the health of Puget Sound.”

Early communication from PSRC about the VISION 2050 plan review process, well in advance of 2023/24 GMA updates, will be helpful. To help focus technical assistance for the stormwater aspects of the plans, particularly for smaller jurisdictions and counties, PSRC may also be interested in MS4 permittees’ reports about their stormwater planning processes that must be submitted in 2021 and 2022.

**Water quality benefits of protecting open spaces**
Overall, the VISION 2050 policies and actions to protect open space are consistent with the findings of studies conducted in recent years and, as such, complement the environmental
policies and actions articulated elsewhere in VISION 2050. In our comments on the SEIS we referred to the findings from the watershed-scale scenario modeling that was conducted by King, Pierce, Snohomish, and Clark Counties in the previous (2013-2019) permit term. Long-term protection for open spaces is a proven approach to maintaining water quality and habitat in small streams in the Puget Lowlands, and Ecology encourages our MS4 permittees to consider this approach as a stormwater management strategy. “Smart growth” will emphasize strategic protection of open spaces as one of the best approaches to maintain and protect water quality.

As WQP reviewed GMA procedures in writing the new MS4 permit requirement, we noted that “level of service” is a concept that is applied to roads, wastewater, and other utilities – but not to water quality protection in general or to stormwater in particular. The collective construction of new highways, major roads, and substantial commercial and residential development in undeveloped lands in outlying rural areas will degrade water quality, unless it is accompanied by both an increased level of stormwater management services and protection of riparian areas.

We appreciate VISION 2050’s promise to “advance tools and techniques to address the challenges of vesting in rural areas, such as conservation programs, purchase of development rights, transfer of development rights, and lot consolidation.” The region will continue learning how to meet these challenges to apply scientific findings to transportation services and development patterns, and many local governments will appreciate PSRC’s support in doing so.

**Addressing the gap between stormwater retrofit needs and available resources**

We appreciate the VISION 2050 commitment to “investigate existing and new funding sources for infrastructure, services, economic development, natural resource planning, and open space, to assist local governments with the implementation of VISION 2050. Explore options to develop incentives and innovative funding mechanisms, particularly in urban centers and transit station areas. Provide technical assistance to help local jurisdictions use existing and new funding sources.” Ecology and MS4 permittees will appreciate other sources of funding to accelerate the pace of stormwater retrofits. We agree that new sources of funding are vital if local governments are to achieve the regional vision. We hope that PSRC can also support and encourage public-private partnerships to support these infrastructure improvements.

**Beyond regulations**

It will take more than MS4 permits to fully restore and protect water quality and habitat in the region. Outside of our regulatory framework, we fully encourage environmental stewardship on private and public lands to protect and enhance habitat and water quality. Thousands of volunteers are installing and maintaining rain gardens and de-paving underutilized hard surfaces, turning them into community assets. WQP is proud to partner with and support such efforts where we have the capacity and resources. We also look forward to accelerating the pace of urban stormwater retrofits in the near future and utilizing coordinated plans to inform the most strategic projects to receive future state funding resources.

**An editorial correction**

On p. 111 in Figure 30, the bars for Kitsap County are mislabeled.
Water Resources
Stacy Vynne McKinstry, (425) 649-7114, stacy.vynnemckinstry@ecy.wa.gov

Page 54: Additional text to consider under watershed planning as it relates to rural development: Ecology is currently working closely with jurisdictions to develop Watershed Restoration and Enhancement Plans as part of a legislative mandate (RCW 90.94.030) in watersheds that cover Snohomish, King, Pierce and Kitsap Counties (as well as other Puget Sound areas). These Plans have a specific focus to offset the impacts of water use in rural areas.

Page 86: Comment on MPP-DP-41: Watershed Restoration and Enhancement Committees planning under RCW 90.94.030 are estimating the potential number of new domestic permit-exempt uses from January 19, 2018 through January 19, 2038. The conversion of designated resource lands to residential uses could affect these growth estimates. Conversion of designated resource lands to rural residential zoning in rural areas could have an impact on streamflows. If designated resource lands are converted to rural residential uses, counties should coordinate with the Ecology's Water Resources Program regarding potential new permit-exempt domestic wells.

Page 88: Comment on DP-Action-6: Domestic permit-exempt wells should be minimized in urban unincorporated areas. These areas should be provided with water and sewer service, where possible. Where homes are served with permit-exempt domestic wells in unincorporated areas, then later hooked up to public water and sewer services, these "legacy" wells often remain on the lot. Legacy wells should be decommissioned. Providing urban services within unincorporated urban areas can prevent "legacy wells" in the future.

Page 128: Comment on PS-5, PS-6, and PS-7. Comment on PS-5, PS-6, and PS-7. Many water providers have water service areas and distribution lines that extend outside of cities and UGAs. Public water service in rural areas can benefit streamflows and water quality by reducing domestic permit-exempt wells. While sewer services are generally not allowed outside of UGAs, in circumstances when sewer is provided to rural areas, water services should also be extended along sewer lines.

Page 129: Comment on MPP-PS-9: Reclaimed water facilities must evaluate potential impairment to water quality and water rights. When siting and investing reclaimed water facilities, surrounding water rights and irrigation practices should be considered. There may be unique opportunities to improve streamflow by permanently protecting a previously used water right in stream, and serving that same use with reclaimed water.

Page 130: Comment on MPP-PS-22: Watershed Restoration and Enhancement Committees planning under RCW 90.94.030 in portions of Snohomish, King, Pierce and Kitsap Counties are currently identifying opportunities that can enhance instream flows and aquatic resources and offset the impacts of permit-exempt domestic wells.

Page 130: Comment on MPP-PS-23: Where water conservation provides permanent benefit to streamflow, it could provide offset for new domestic, permit-exempt wells. Watershed Restoration and Enhancement Committees planning under RCW 90.94.030 are identifying such
opportunities. Where there is local support, these projects can be important elements of Watershed Restoration and Enhancement Plans.

Thank you for considering these comments from Ecology. We commend VISION 2050’s big picture goals and recommended development practices to improve the quality of life for the region’s citizens and improve coordination, integration, and collaboration of local planning efforts. If you have questions or would like to respond to these comments, please contact one of the commenters listed above.

Sincerely,

Meg Bommarito
NWRO Regional Planner

Sent by email: PSRC, VISION2050@psrc.org

ecc: Tom Buroker, Ecology Northwest Regional Office Director
      Karen Dinicola, Ecology
      Stacy Vynne McKinstry, Ecology
      Maria Sandercock, Ecology
      Gail Sandlin, Ecology
References


September 12, 2019

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

Re: Comments on the Draft VISION 2050 Plan

Dear Mr. Brown:

Thank you for the opportunity to review the draft VISION 2050 Plan. WSDOT appreciates the work that PSRC does to manage growth and keep our region moving through the VISION 2050 planning process. We look forward to continuing to partner with PSRC, its counties, and its cities as VISION 2050 is approved and implemented in the coming years. The following provides comments on several key elements of the plan, followed by technical comments for your consideration.

Support for the Transit-Focused Growth Strategy

As we noted in our letter dated April 17, 2019 regarding the VISION 2050 Draft SEIS, we support the Transit-Focused Growth Alternative, which focuses growth near our existing and future transit investments. We also recognize that this alternative has the highest risk of displacement for vulnerable communities, and are pleased to see RC-Action-3 that calls for PSRC, in coordination with member governments and community stakeholders, to develop a regional equity strategy intended to make equity central to its work and to support the 2023/2024 local comprehensive plan updates.

Additionally, we appreciate that VISION 2050 has acknowledged the importance of better managing equity and health disparities, as well as the need for more meaningful consultation with tribes that continue to be affected by population growth and climate change in the region.

Regional Centers Framework

In our previous letter, we also brought up a question regarding growth in areas targeted for high-capacity transit. Specifically, how PSRC will distribute growth in these areas over the 30-year horizon proposed by the VISION 2050 Plan. The draft plan and its implementation could be improved with a discussion of the ways in which local population and employment target processes will be conducted in the years prior to the planned transit investments opening for service.

Additionally, we would like to reiterate our comment from the April 2019 letter regarding the Regional Centers Framework. The plan could be strengthened by identifying which regional growth centers are Metro Growth Centers or Urban Growth Centers. It’s important to know how much growth will occur in each of these types of centers as opposed to other parts of the region,
September 12, 2019
Mr. Josh Brown
Page 2

as it has implications for transportation planning and congestion management. Cities and counties would benefit from having this information so they can best allocate growth targets.

Concurrency Best Practices

WSDOT is supportive of the innovative work that PSRC is doing to develop new approaches to multimodal level-of-service standards. We support and are interested in participating in any future efforts to achieve DP-Action-5, which calls for better understanding how state highways can be addressed in local concurrency programs.

Additional comments

Overall, we appreciate the new sections that help explain the importance of regional planning efforts and how the process comes together in local plans, countywide planning policies, the Growth Management Act, and VISION 2050.

Many of the policies included in VISION 2050 align with WSDOT policies, including our Practical Solutions approach and our plans, such as the Washington State Ferries Long-Range Plan. The emphasis on equitable mobility and accessibility is important to our agency and will be critical in the coming years as population growth continues, resulting in more individuals and freight relying on the regional transportation system.

Technical comments

For your consideration, we have included a table with technical comments and the corresponding page numbers.

Again, we appreciate the opportunity to comment on the draft VISION 2050 Plan and look forward to continuing our conversations about building a safe, equitable, and sustainable transportation system in the central Puget Sound. Please do not hesitate to reach out if you would like to discuss any of WSDOT's comments.

Sincerely,

Roger Millar, PE, FASCE, FAICP
Secretary of Transportation

RM: rm
Enclosure: WSDOT Technical Comments

cc: Patty Rubstello, WSDOT        Marshall Elizer, WSDOT
    Robin Mayhew, WSDOT          Mike Cotten, WSDOT
    John Wynands, WSDOT         Kerri Woehler, WSDOT
<table>
<thead>
<tr>
<th>Page No.</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>16</td>
<td>In the discussion of Health and Disparities on page 16, consider making access to transportation as a challenge for marginalized communities more explicit.</td>
</tr>
<tr>
<td>17</td>
<td>In the discussion of Coordination with Tribes on page 17, consider adding transportation as one of the services offered by tribes.</td>
</tr>
<tr>
<td>18</td>
<td>The first paragraph states that counties and cities are challenged to maintain existing facilities under current revenues. The state, tribes, transit agencies, and ports are also challenged to maintain facilities under current revenues. Consider broadening this discussion to show that this is a common problem for all stakeholders.</td>
</tr>
<tr>
<td>63</td>
<td>User Fees are discussed on page 63 but are not explicitly defined in terms of how they are different from traditional pricing mechanisms. Consider including more context regarding user fees.</td>
</tr>
<tr>
<td>63</td>
<td>In the discussion of Technology on page 63, consider expanding the reference of transit authorities transitioning to electric vehicles to other low emissions fuel types.</td>
</tr>
<tr>
<td>83</td>
<td>For MPP-DP-4, consider expanding the policy includes support for transforming underutilized lands into industrial/freight-dependent sites, especially for unused or underutilized brownfield areas along railroads and working waterfronts. This may be helpful for reducing industrial sprawl, revitalizing commercial districts, and shifting freight trips off of the road network.</td>
</tr>
<tr>
<td>87</td>
<td>For MPP-DP-49, consider expanding the protection of industrial lands to included &quot;freight-dependent lands.&quot;</td>
</tr>
<tr>
<td>111</td>
<td>On page 111, considering add reference to the regional commuter rail system and the benefits of that service such as serving growth centers with longer-distance transit service, and providing travelers living outside the region access downtown Seattle and other areas without the need to travel on the regional highway system.</td>
</tr>
<tr>
<td>116</td>
<td>In the discussion of Supporting the Economy on page 116, consider mentioning that freight volume will grow substantially by 2050, which can significantly impact the region’s freight network, resulting in excessive delay and increased business costs. This also relates to MPP-T-25 and MPP-T-26.</td>
</tr>
<tr>
<td>117</td>
<td>In the Innovation and Disruptive Change section on page 117, consider mentioning e-commerce and urban delivery as disruptive changes to the transportation system. E-commerce is changing the way people live and shop and continues to take more and more market share away from the retail sector. As more people move into growth centers, online ordering reduces their dependence on cars, but can substantially increase the number of deliveries into the area. Freight trips are happening more frequently and in smaller vehicles. This discussion would reinforce T-Action-3.</td>
</tr>
<tr>
<td>120</td>
<td>For MPP-T-27, consider revising the wording of this policy from “Coordinate regional planning with rail line capacity expansion plans and support capacity expansion that is compatible with state, regional, and local plans” to “Coordinate regional planning with rail system improvement plans and support system improvements that are compatible with state, regional, and local plans.” This widens the definition to include other topics, such as grade crossing improvements, which may require coordination with local and regional plans.</td>
</tr>
</tbody>
</table>
The Vision 2050 plan must prioritize equity and sustainability for regional growth through the Urban Development Pattern. This means focusing new growth around urban infill development and high capacity transit nodes. The PSRC should also work with regional leaders and impacted communities to craft and implement strategies to minimize the negative impacts of urban redevelopment, especially displacement and gentrification of communities of color.

In addition the PSRC’s planning needs to fund projects that encourage active transportation to high capacity transit nodes - especially biking and walking - to increase transit ridership and minimize future carbon pollution from cars.

Mark Foltz
Welcoming Wallingford

Welcoming Wallingford are Wallingford residents and friends who welcome more neighbors and say “YES! in our backyard.” Our vision is a more equitable, sustainable, and inclusive Wallingford and Seattle.
This comment is in general support of the Sound Cities Association policy statement on affordable housing (has been emailed separately to vision2050@psrc.org). In addition, we further support the designation of Downtown Kirkland as an Urban Center, as it has all the parts to make an effective Ten Minute Community.
Hello,

In addition to our comments made to the online form at //PSRC.org/vision to generally support the SCA statement, here is the attached language.

Angela Rozmyn
Sustainable Redmond LLC

Robert Pantley
Kirkland Sustainable Investments LLC

Best,

Angela Rozmyn, LEED AP
Director of Sustainable Development

angela@pantley.com
http://www.naturalandbuilt.com
Cell: 425-765-4037
Office: 425-828-4663
SCA believes that healthy, vibrant communities are ones that offer affordable housing options for families and individuals all along the income spectrum.

In recent years, the speed of economic and population growth in our region has outpaced the growth in housing supply, creating a shortage of affordable housing—pricing out too many households and threatening the fabric of our community.

We will continue our work to address homelessness and low-income housing and we will also work to address the growing crisis of the lack of affordability of middle-income housing in the area. Too many of our teachers can no longer afford to live near the schools where they teach.

Too many nurses, teachers, police and other first responders are moving out of the communities they serve to find homes they can reasonably afford. Homelessness continues to rise, and our local workforce is commuting from farther and farther away – worsening congestion and eroding our sense of community.

To address this problem, we intend to do our part to break down barriers and provide incentives to substantially increase the supply of quality housing for all households in our community. We will consider opportunities to advance housing affordability in the region, including but not limited to:

1. Making available at no cost, at deep discount, or for long-term lease, under-utilized publicly-owned properties,
2. Updating zoning and land use regulations to increase density near current and planned public transit,
3. Reducing or waiving parking requirements in transit corridors to help reduce overall development costs,
4. Reducing or waiving impact and other development-related fees,
5. Streamlining and accelerating the permitting process for low- and middle-income housing projects to improve developer certainty,
6. Providing tax exemptions and credits to incent low- and middle-income housing development, and
7. Updating building codes to promote more housing growth and innovative, low-cost development.

We believe that these efforts, combined with the support of the greater community, will make our region more affordable for all households and will advance quality of life throughout the region.
This comment is in general support of the Sound Cities Association policy statement on affordable housing (has been emailed separately to vision2050@psrc.org.)
SEPTEMBER 10, 2019

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

SUBJECT: COMMENTS ON DRAFT VISION 2050 PLAN

Dear Paul:

I’m writing as a local business owner and off-and-on resident of the Puget Sound for the last four decades. Further, I have over two decades of land use and economic development experience and through my company I advise public and private sector clients nationwide in the areas of site selection; site feasibility and evaluation; permitting and entitlements; and the creation and execution of business attraction, retention and expansion programs.

General Comments

During my two decades of on-the-ground experience in the public meetings and hearings on development applications (residential, commercial and industrial) and annexations, I’ve noticed that the public is strongly in favor of the overall approach to growth as laid out in this plan (which is consistent with the public feedback you received through surveys and meetings). Yet I’ve also seen that the support for this approach is strong in the abstract, but fleeting when it comes to specific development that impacts their neighborhood, commute, etc. In fact, I still hear and read occasional comments where development of a vacant parcel of land is referred to as sprawl, even though the development proposed is within an established urban growth area. I believe strongly that more public education is needed after planning processes such as this to truly create a better understanding of how these policies look in practice.

I agree that increasing the intensity and density of growth in certain transit and transportation corridors is generally a good approach for handling growth. However, based on what’s happened in the last two decades, I am concerned that relying too heavily on densities in transit and transportation corridors de-emphasizes the importance of the diversity of housing needs in our region. More importantly, rigid implementation of this approach will contribute to (instead of slow) the cost escalation of market rate housing, exacerbating displacement and continuing the trend of pushing individuals to reside further and further from employment centers to where housing can be obtained. Solving the region’s housing affordability, availability and accessibility issues must look beyond the heavy emphasis on density in transit corridors. I strongly encourage PSRC to allow more flexibility in how individual counties and their cities accept, plan for, and pattern growth in recognition of their market conditions and community needs.

Vision 2050’s focus on higher densities within transportation and transit corridors heavily favors keeping growth along the Interstate 5 corridor, failing to recognize that many of Snohomish County’s eastern cities house significant numbers of the workforce for King County. This raises a concern that policies MPP-DP-37 and MPP-T-22 appear to discourage future investments in Highway 9, US 2 and SR 522. The fact that over the last few decades these corridors haven’t received greater attention and higher priority for investment has been a failure in planning which will seemingly be compounded should this be the intent of these policies.

Attached is a graphic from a presentation by Snohomish County earlier this year that shows the commuting destinations from each UGA in Snohomish County. Well over 40% of the populations within all Snohomish County UGAs (except Stanwood, Arlington and Granite Falls) commute to King County. And many of those commuters rely on Highway 9 and SR 522. Even as commuting patterns change to support employment growth in the Marysville-
Arlington MIC, large numbers of people will continue to commute to King County via Highway 9 and 522. It is imperative that these corridors are not forgotten.

Significant opportunities for job growth will exist in the Arlington-Marysville MIC and both Marysville and Arlington have been designated as High Capacity Transit Communities. However, looking at that opportunity from the perspective of a site selection consultant, companies locating to this area will be looking for a high concentration of workforce. Therefore, it is short-sighted for this 30-year plan to not consider Lake Stevens’ importance to the long-term success of the Arlington-Marysville MIC, especially given that the Marysville and Lake Stevens UGAs are connected. Vision 2050 should provide flexibility that allows Snohomish County’s Comprehensive Plan Update to consider:

- The role that a community like Lake Stevens should play in supporting the job growth in the Arlington-Marysville MIC.
- The ability of Lake Stevens to get a proportionate share (potential even through expansion) of commercially developable land development to ensure it has a stable, diverse tax base and its own, localized employment opportunities.
- The level of transit and transportation infrastructure necessary to connect the residential population in Lake Stevens, Granite Falls and Snohomish to the job center that will be created in the Arlington-Marysville MIC.
- A better vision for moving people and goods along the Highway 9 corridor to support connectedness between Lake Stevens and the Arlington-Marysville MIC, as well as connections and commerce between the eastern Snohomish County UGAs and the urban cores of Everett, Lynnwood, etc.

Moreover, I question why Lake Stevens has not been considered for designation as an HCT Community that supports the Arlington-Marysville MIC and to which appropriate investments are planned and made in transit and transportation facilities that will move residents to and from jobs within the future MIC center.

Although Vision 2050 identifies the challenge of creating housing choices and affordability, it neither acknowledges nor addresses one of the most significant factors behind the challenge: the cost of land. While increasing density can off-set a portion of the rising cost of land and slow the rapid cost escalation of housing, density cannot by itself satisfactorily address the biggest factors in cost escalation:

1. The remaining land supply within the urban growth boundaries (after the prior decades of development) is the most challenging to develop (e.g. critical areas impacted, topographically challenged, etc.). The result is increased design costs, more advanced and expensive infrastructure solutions, and higher construction costs.

2. An inadequate supply of available land on the market drives up costs as competition for the ‘best of the worse sites’ is fierce.

PSRC and the communities in the region should evaluate as part of the coming buildable lands analysis opportunities to preserve and protect some of the more heavily constrained lands within the UGAs (through reduced development emphasis) with offsetting, minor adjustments to urban growth boundaries where more suitable, developable land is abutting UGAs and near key transportation corridors, including places like Highway 9 (e.g. the SW UGA in Snohomish County).

Communities need flexibility at the local level when allocating growth targets, establishing densities and evaluating adjustments to urban growth boundaries. Such flexibility is critically important for growth planning to recognize localized conditions and market factors within the context of broader policy objectives.
Cities were intended to and should be the providers of urban services, as they are in the best position to plan for growth in a manner that creates a sense of place based on each community’s identity. It is positive to see that PSRC is placing an emphasis on the importance of annexation and the need to make annexations easier.

I support fully the school districts in Snohomish County, which seek more flexibility in county and multi-county policies for siting schools. Existing policies (and state law) have limited the ability of schools to provide services that keep up with growth because (a) their ability to acquire properties is limited by funding, timing and competition with other land uses willing to pay higher prices, (b) there are fewer and fewer parcels of adequate size and development suitability in many school districts, and (c) they have site selection criteria (e.g. amount of time students should be on a bus) that rightfully limits future school locations to support quality of life for the student.

**Plan Comments**

*MPP-RC-6 through 9 (page 19).* In reading these three policies in concert with Figure 26, MPP-DP-37 and MPP-T-22, I am concerned about Highway 9 and SR 522 not getting the investments needed to recognize their significance to economic development and quality of life. And in the particular case of Highway 9, I am concerned these policies will impact Lake Stevens’ role in the future success of the Marysville-Arlington MIC.

Highway 9 and SR 522 predominantly serve stand-alone UGAs, connect UGAs via rural areas, and are a distant from those community receiving the highest growth designations. As such they have not received investment to the degree necessary to support the planned urban growth that has already occurred over the last several decades. And going forward both transportation corridors will play an ever growing and critical role in connecting residential populations throughout Snohomish County’s eastern UGAs to employment centers in King and Snohomish County. MPP-DO37 and MPP-T-22 should not be used to exclude investments in Highway 9 and SR 522, not isolate those communities from opportunities.

**Growth Strategy (pages 23 and 24).** I am concerned that the use of “stable” is a mild substitute for static (status quo) as it pertains to urban growth area boundaries. In that view, I support amending language to create more flexibility to make minor adjustments to boundaries (as have been made over the last few decades) based on the need to balance multiple policy objectives and consider local market conditions.

**Distribution of Growth (page 27).** As mentioned previously, I question the designation of Lake Stevens as a city/town because such designation does not acknowledge Lake Stevens’ role in and relationship to the employment growth that will occur in the Marysville-Arlington MIC. To that end, the flexibility in establishing local growth targets should allow for the opportunity to more broadly evaluate the relationship between residential population centers (like Lake Stevens) and planned employment centers.

**Regional Geographies (page 29).** Reviewing the map on this page map shows how connected urban growth areas are in King and Pierce Counties versus the presence of many stand-alone UGAs in Snohomish County. Specifically, looking at the “gap” area along Highway 9 which borders the Everett, Mill Creek and Southwest UGAs (in Snohomish County) begs the question of why this area hasn’t been viewed more seriously as part of the urban core being planned, especially given its proximity between the existing King County employment base and the Marysville-Arlington MIC. In many cases, this “gap” area is already characterized and substantially impacted by urban areas such that it should be further evaluated for expansion. Snohomish County recently completed a study of this area and the regional planning framework should look more closely at this area’s connectedness to existing and planned core urban areas and centers.

**Regional Growth Strategy Adjustments (Page 43).** Given the connectedness between the Lake Stevens and Marysville UGAs and their shared location along the Highway 9 corridor (which will be a primary route taken by workforce employed in the MIC), more emphasis should be placed on how growth should be allocated between these two communities. The multi-county growth strategy should be flexible enough to allow policy choices at the city and
council level to address areas of opportunity that can respond to changing local conditions, through investments in connecting transportation improvements (Highway 9) and responsive land use policy that addresses housing and commercial development needs, as well as the need to equitable tax bases.

**MPP-RGS-4 and MPP-RGS-5 (page 44).** I believe these policies should be clarified to separate the action of rural development from that of minor adjustments to UGA boundaries. While both involve lands currently designated with rural zoning, the former has a greater overall impact on rural preservation and rural character while the later impacts lands having urban characteristics based on the adjacency to and impacts from current urban growth boundaries.

**MPP-RGS-11 (page 45).** This policy conflicts with flexibility in MPP-RGS-3. Alternative language for this policy should be considered as follows:

“Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by where high-capacity transit does not exist and is not planned.”

**MPP-En-5 (page 55).** The opportunity to preserve and protect important natural features within the UGAs should be more strongly considered through the exchange of development in these areas for minor urban growth boundary amendments where land more suitable for development can be deployed. I would like to see this policy amended or a more flexible policy added.

**MPP-DP-37 (page 86).** I would like to see this policy amended to ensure it does not impact the investment in critical transportation corridors (e.g. Highway 9, U.S. 2 and SR 522) that connect many of Snohomish Counties urban growth areas to King and Snohomish County employment centers.

**Regional Transportation Plan.** I am concerned that Highway 9, U.S. 2 and SR 522 in Snohomish County are not transportation corridors that appear (for example see Figure 31) to be priorities for greater levels of investment. Yet these transportation corridors are critically important for moving people between multiple urban growth boundaries and the employment centers in King County (Bellevue, Redmond, etc.) and Everett/Lynnwood, as well as the future employment center planned for the Marysville-Arlington MIC. Please consider policy amendments that recognize and prioritize the importance of these vital transportation corridors.

**MPP-T-22 (Page 120).** This policy as it appears to impact future investments in Highway 9, U.S. 2 and SR 522 in Snohomish County. These corridors are critical for moving people and goods between urban growth areas, as well as between population centers and employment centers. I would propose the following amendment to this policy language:

“Avoid construction of new major roads and capacity expansion of existing roads in rural and resource areas. Where increased roadway capacity 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.”

**MPP-PS-26 and 27 (Page 130).** I strongly urge the PSRC to strike the language “except as provided for by RCW 36.70A.211” and replace it with language that will be less specific and more supportive how schools may need to be sited. Additionally, PSRC should add a third “Action” to this section which recognizes the need to work with school districts on changes in legislation that ensure school districts can respond to growth within their boundaries and also maintain a quality of life for students and the community.
Thank you for the opportunity to provide comments on the Draft Vision 2050 plan. Should you have any questions, please do not hesitate to contact me at david@toyerstrategic.com.

TOYER STRATEGIC CONSULTING, LLC

[Signature]

DAVID K. TOYER  
/Founder/