



March 19, 2018

To: Paul Inghram (pinghram@psrc.org)
Senior Program Manager
Growth Management Planning
PSRC

Re: PUBLIC COMMENTS—DRAFT VISION 2050 Plan and SEPA Scoping Notice

Mr. Inghram,

Please accept the Greater Maple Valley Unincorporated Area Council's (GMVUAC's) Public Comments herein on the PSRC's DRAFT *VISION 2050 Plan and SEPA Scoping Notice*. We represent and advocate with King County, the PSRC, WA State officials, and other organizations for the interests of approximately 18,000 people who live in our Rural Area of King County.

We see the *VISION 2050 Plan* as a forward look at regional issues and a framework to address future challenges. Only the PSRC can ensure a regional focus to bring different jurisdictions together to solve collective problems. In so doing, we seek to keep the Rural Area rural by ensuring largely urban-serving facilities are sited in Urban Growth Areas. Further, we look to the PSRC to enforce agreed-to Growth Targets to ensure jurisdictions do not unduly burden their neighbors. These and many other efforts will help us achieve a truly sustainable vision for the year 2050.

The PSRC provides a great opportunity to bring together State and City governments, UACs, private groups, and individual citizens within a four-county area. In this regional role, we believe the PSRC is in a unique position to effectively break down organizational "silos" to achieve lasting regional solutions. Only the PSRC has this type of flexibility and scope of regional planning responsibilities.

We wish to continue an open dialogue with the PSRC on the *VISION 2050 Plan* and its pertinence to Rural Area issues, as we work on the plan details leading to its eventual approval and implementation.

Thank you for your consideration of our comments.

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GMVUAC COMMENTS

(Cover page): PSRC is extending the region's growth plan to 2050.

VISION 2050 will build on the region's existing plan, VISION 2040, to keep the central Puget Sound region healthy and vibrant as it grows.

As the region prepares to add more people and jobs in the coming decades — about 1.8 million more people by 2050 — VISION 2050 will identify the challenges we should tackle together as a region and renew the vision for the next 30 years.

COMMENT:

1. How will the integrity of the Urban Growth Boundary should be maintained as the region seeks to accommodate 1.8 million new people.
2. What land-use, transportation, and social system adjustments are implied?
3. What land-use policy changes may be needed to encourage development patterns that work together with high-capacity transit systems to serve growth at an adequate level of service?
4. What re-thinking of financial funding strategies may be needed to accommodate growth of this magnitude?
5. How can rural areas be protected from infringements of urban growth (e.g., “pass-through” commuters)
6. How can marginalized segments of society (e.g., the poor, racial minorities, the elderly, etc.) be protected from the adverse impacts of this prosperity-driven growth for the majority segment of the population?
7. How can the PSRC, as the State-designated Regional Planning Organization, and given the growth to come, ensure jurisdiction (County and City) comprehensive plans are properly implemented and followed?

(p. 1): VISION 2040 helps to coordinate the local growth and transportation plans developed by cities and counties to make sure they are consistent with the Growth Management Act and regional transportation plans.

The Puget Sound Regional Council (PSRC) is the planning agency for the central Puget Sound region, which includes King, Pierce, Snohomish and Kitsap counties. PSRC has specific responsibilities under federal and state law for transportation planning and funding, economic development, and growth management.

PSRC is updating VISION to consider new information and perspectives about a changing region. PSRC is seeking community input to shape the plan.

What important regional issues should we focus on during the update?

COMMENT: Implementing Regional Transportation Concurrency to ensure “pass-through” traffic is addressed ahead of time at the development stage.

How should the region's growth strategy be updated to plan for 2050?

COMMENT: Although there are set Growth and Job Targets, without sufficient jobs generated within a jurisdiction, its growth simply leads to more intolerable traffic congestion

As we consider different ways to grow as a region, what impacts and actions should be evaluated through environmental review?

COMMENT: Cities on the urban fringe and with single-spine ingress/egress road infrastructure (e.g., Black Diamond) should not be allowed to exceed their Growth Targets, especially, grossly

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exceed them, as this would disturb growth plans and patterns throughout large sub-regional areas (e.g., SE King County).

Over the next two years, PSRC will work with cities, counties, tribes, other agencies and interest groups, and the public to develop VISION 2050. PSRC will engage the public through surveys, workshops held throughout the region, formal comment periods, and input to PSRC's elected board members.

COMMENT: It should be recognized "counties" include Unincorporated Area (both Urban and Rural) citizens whose voices should be part of the VISION 2050 development process.

(p. 1): Graph: Population and Employment Growth in the Central Puget Sound Region

PSRC's draft forecast shows 1.8 million more residents and 1.2 million more jobs in the region by 2050.

(p. 2): Planning as a REGION

Since 2010, the region has experienced significant growth with about 375,000 new neighbors calling the central Puget Sound home. Meanwhile, major infrastructure investments — like completing the 520 bridge and extending light rail from Everett to Tacoma to Redmond — are moving forward.

The region has had important successes implementing VISION 2040, which helps to fulfill the goals of the state Growth Management Act (GMA). The plan has helped coordinate state and regional initiatives and supported local decisions. Cities are thriving. Regionally, growth is shifting towards more compact, sustainable development occurring within urban areas and cities, with cost effective and efficient services, reduced impacts on the environment, and positive health outcomes.

COMMENT: Unfortunately, this is not the case with the approved Master-Planned Developments (MPDs) in the cities of Black Diamond (2) and Covington (1). While the concept of MPDs might be good, their placement on the urban fringes where few if any jobs exist or will be generated, simply adds to already-intolerable traffic congestion.

COMMENT: New businesses and multi-unit residences should provide their own parking *within* their building footprints, e.g., parking availability under the building, thus not wasting valuable land and creating more "heat-islands" of asphalt.

At the same time, the region continues to face significant challenges, including the climbing cost of housing. Congestion from rapid growth is reducing access to jobs, services, and housing. While recent economic growth has been strong, prosperity hasn't benefited everyone or all parts of the region. Finally, pressing environmental issues, such as climate change and preserving open space, require more collaborative, long-term action. VISION 2050 is an opportunity for cities and counties to work together to address the key challenges that extend beyond the boundaries of any single community.

COMMENT: While these are admirable goals, all too often each city works within its own "silo," especially when it comes to transportation infrastructure planning related to its own development. Without instituting the concept of: "Regional Transportation Concurrency," this is an ever-increasing race to the bottom, one which will result in even more gridlock, thus choking the region's economy and further harming its quality of life. That said, it must be acknowledged current Concurrency laws often are interpreted in ways that effectively gut their intent.

(p. 3): What is in VISION 2040 ?

VISION 2040 is the region's current plan for managing growth forecasted through the year 2040. The plan includes overarching goals, an environmental framework, a strategy to sustainably guide growth in the region, and multicounty planning policies. The plan also includes actions at the regional, county, and local level to

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make the plan a reality. VISION has six chapters addressing the environment, development patterns, housing, the economy, transportation, and public services.

The plan includes goals and policies to:

- Protect and restore the natural environment and reduce greenhouse gas emissions.
- Plan for growth in cities and urban centers, while reducing sprawl.
COMMENT: Add at the end of this bullet: "...and protecting the integrity of the Rural Areas."
- Improve the balance of jobs and housing across the counties.
- Create more vibrant and resilient urban centers.
- Support health, well-being, and active living.
- Provide affordable housing choices to meet the needs of all residents.
- Improve mobility for people and goods.
- Maintain and operate the transportation system safely and efficiently.
- Encourage a strong, diverse economy.
- Provide services like solid waste, energy, and water systems to support the region's growth.

VISION 2040's Regional Growth Strategy defines a role for different types of places in accommodating the region's residential and employment growth. The strategy is organized around guiding most employment and housing growth to the region's largest cities and urban centers. Other cities and unincorporated urban areas are expected to play a more modest role as locations for new growth. Outside the urban area, rural communities, farms and forests will continue to be a permanent and vital part of the region.

Environmental review for VISION 2040 showed that, compared with a broad range of alternatives, the desired growth pattern would have significant benefits for mobility, air quality, environmental stewardship, and healthy communities.

(p. 4): Map: VISION 2040 Regional Growth Strategy (VISION 2040 guides most new growth to cities and urban areas)

(p. 5): Maps: Where Growth is Happening (Growth has been focused in the urban area. In 2015, for example, 96% of new permitted housing was in cities and urban areas AND 290,000 jobs have been added to the region since 2000, with strong growth in employment centers along the I-5 corridor)

(p. 6): SCOPING and Environmental Impact Statement Process

Determination of Significance and Request for Comments on Scope of Environmental Impact Statement

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PSRC has proposed to update and revise the long-range growth, economic, and transportation strategy for King, Pierce, Snohomish and Kitsap counties. PSRC, as lead agency for environmental review, has determined that the proposal to update VISION 2040 is likely to have significant adverse impacts on the environment, and is therefore issuing a Determination of Significance (DS). This notice announces PSRC's intent to prepare a supplemental environmental impact statement (SEIS) on the proposed update to VISION 2040, pursuant to RCW 43.21C.030(2)(c). The SEIS will contain new information and analysis, and may also build on data and analysis contained in existing environmental documents, any of which may be adopted or incorporated by reference as appropriate, according to State Environmental Policy Act (SEPA) rules. The process will integrate SEPA and GMA to allow for consideration of environmental information as well as public input, and to assist decision makers in meeting the goals of GMA while identifying and mitigating probable significant adverse environmental impacts under SEPA.

Under the SEPA process (WAC 197-11-408), PSRC is completing a scoping period to inform the environmental review process for the VISION 2040 update. Pursuant to SEPA, PSRC is notifying the public of the intent to prepare an SEIS so that residents, jurisdictions, agencies, and tribes have an opportunity to comment on the scope of the impacts to be analyzed. Affected members of the public, jurisdictions, agencies, and tribes are invited, by this notice, to comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. The method and opportunities for comment are provided on page 11.

(p. 7): Input on Environmental Review

PSRC is seeking input on environmental issues for analysis.

Natural and built environment. PSRC has identified the following environmental areas for potential discussion in the SEIS:

- Land use and population; employment; housing; transportation; air quality; ecosystems; water quality; public services and utilities; parks and recreation; environmental health; energy; visual quality and aesthetic resources.
- The scoping process may be used to expand or narrow the environmental areas that need updated analysis.

Additional issues that may be addressed. In addition to the areas listed above, PSRC contemplates that environmental analysis may address the following subjects, which may be modified in response to public comments and further analysis:

- Housing affordability; economic inequality; social equity and access to opportunity; healthy communities; climate change adaptation and mitigation; demographic shifts or changing needs; and funding for infrastructure and other improvements.
- Some issues may be addressed by existing information in the VISION 2040 Environmental Impact Statement (EIS). Other issues may require new information or analysis.

(p. 7): Graph: Increasing Median Housing Costs

Nationally, the region is at or near the top among peer regions in annual housing cost increases

Scoping Question:

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What issues should be considered for environmental review?

COMMENT: Traffic congestion and its contributions to air and water pollution and increase in greenhouse gas emissions.

(p. 8): Input on Assumptions, Themes, and Issues

PSRC is seeking input on key assumptions to inform the plan update. This SEIS will build on the VISION 2040 EIS and include information analyzing the environmental impacts of updating VISION 2040.

- **Plan for 2050.** A new regional forecast will show expected employment and population through 2050. PSRC is planning for 1.8 million more people and 1.2 million jobs by 2050.
- **Implement the Growth Management Act.** VISION 2050 will continue to further the Growth Management Act's objectives of preventing sprawl; conserving farmlands, forests, and open spaces; supporting more compact, people-oriented communities; focusing a significant amount of new employment and housing into vibrant urban centers; and coordinating between local governments.
- **Use VISION 2040 as starting point.** PSRC will build on VISION 2040's current framework — goals, policies, and Regional Growth Strategy — as the starting point for developing VISION 2050.
- **Focus on emerging and important issues.** To efficiently use public resources and time, the plan update will focus on a limited set of issues that may benefit from additional regional discussion, coordination, and planning. Issues such as housing affordability, climate change, social equity, and shared economic prosperity have been discussed as key regional challenges.
- **Reflect the diversity of the region.** The plan update will seek to reflect the demographic, cultural, geographic, and economic diversity of the region.
- **Review trends and actions.** Key data trends will inform the update, as well as progress towards implementing the actions contained in VISION 2040. The update will identify actions and roles to realize the goals of VISION 2050 and outcome measures from which to measure progress.
- **Integrate recent initiatives.** The update will consider recent initiatives of PSRC and partners, such as recent local comprehensive plan updates, the Growing Transit Communities Strategy, Puget Sound Clean Air Agency climate change targets, the Puget Sound Partnership Action Agenda, and the Regional Centers Framework Update.
COMMENT: Will the PSRC's Regional Economic Strategy (2017) and PSRC's now-being-finalized Regional Transportation Plan be considered?
- **Acknowledge and leverage major regional investments.** Since VISION 2040 was adopted, voters have approved two Sound Transit ballot measures to expand high-capacity transit. Other regional transit agencies have expanded service, local governments have built key projects, and the state adopted Connecting Washington to fund major transportation projects. The update will address the impact of these investments on regional policies and strategies.
- **Update the document.** PSRC will review the existing plan for out-of-date information or statutory changes since the 2008 adoption of VISION 2040. PSRC will also look for opportunities to make VISION 2050 more accessible and usable.

Scoping Questions:

What regional issues should the plan address?

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COMMENT: How will primarily urban-serving facilities be kept out of the Rural Area where the land is less expensive, but necessary supporting infrastructure is lacking?

What information should guide the update?

COMMENT: A wide variety of sources including, at a minimum: demographic data, trend analyses, lessons learned, economic forecasts, traffic-demand models and analyses, environmental impacts, incentive programs, etc.

(p. 9): **Map: Planned Regional Transit System (2040)** (Transit investments are planned throughout the region to provide more transportation options)

COMMENT: SE King County is grossly undeserved with few, if sporadic, transit options.

(p. 10): **Input on framework for considering modifications to growth strategy.**

One purpose of this scoping process is to gain information so that PSRC can craft a limited range of alternatives for analysis within the Draft SEIS. The existing Regional Growth Strategy will be considered in the context of recent and projected trends, adopted plans, infrastructure investments, and broad goals for the region. The wide range of alternatives studied for the VISION 2040 EIS provides a robust starting point for this process. Within the range of alternatives previously studied, several options may be available to modify the existing Regional Growth Strategy to more effectively achieve the region's sustainability goals. The alternatives that will be developed will use the same assumptions and forecasts for growth through the year 2050.

- **No Action Alternative.** A “no action” alternative must be evaluated in accordance with SEPA. In this proposal, the no-action alternative will be defined as continuing forward with the adopted growth patterns in VISION 2040, to essentially “stay the course.” The existing Regional Growth Strategy would be extended to reflect forecasts for 2050 without amendment or revision to growth shares or regional geographies.

- **2050 Modified Regional Growth Strategy Alternative(s).** A modified 2050 growth strategy(ies) may be defined and evaluated with modified regional geographies, adjusted growth allocations among counties and regional geographies, and/or actions to promote the desired pattern of future population and jobs.

COMMENT: Such modifications should not simply “grandfather” in those jurisdictions, often on the urban fringe, which have grossly exceeded their Growth Targets and seek adjustment of same to accommodate their bad decisions.

Scoping Question:

How should the region's growth strategy be updated to plan for 2050?

COMMENT: Growth should be truly focussed on Regional Growth Centers, not in cities on the urban fringe. In fact, no changes (i.e., increases) in Growth Targets for such cities should be entertained by the PSRC and the Growth Management Policy Board. In addition, when “conditionally” approving Comprehensive Plan updates for such cities, the PSRC should not hedge on these principles, nor allow such cities to reclassify as the next larger category of city, as the City of Covington was allowed to do in 2017. Such cities should be denied by the PSRC any and all Federal Highway funding and such policies should be clearly promulgated.