

**VISION 2050**

**Draft Supplemental Environmental Impact Statement (SEIS)**

**Public Comment**

**April 29, 2019**

**EPCA, GMVUAC,  
GV/LHA, HHA, and UBCUAC**



To: Erika Harris—PSRC Senior Planner, SEPA Responsible Official

Subject: Comments—Draft *VISION 2050* Supplemental Environmental Impact Statement

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

We fully support the broad goals of the Growth Management Act (GMA) as expressed on p. 3 of the subject SEIS: Managing urban growth; Protecting agricultural, forestry, and environmentally sensitive areas; Reducing sprawl; and Encouraging efficient multimodal transportation systems

We believe public policy can provide direction and incentives for communities to grow in ways that will invite personal lifestyle decisions that are consistent with the region’s goals. We also firmly support policies that strive to keep the Rural Area *rural*. Ways to ensure same included recognizing Urban Growth Boundaries are intended to be permanent, not fungible, and that Rural Areas provide benefits in many ways for everyone, including the residents of Urban Areas.

The only alternative detailed in the subject SEIS that supports both the GMA’s broad goals expressed above and our strong objectives to keep the Rural Area *rural* is the “*Transit Focused Growth*” alternative. The advantages of the “*Transit Focused Growth*” alternative are abundantly clear from PSRC’s analyses, with which we agree. The other two alternatives—“*Stay the Course*” and “*Reset Urban Growth*” would set our region back in many areas and should not be pursued.

We have noted key concerns to be addressed at a variety of governmental levels—State, Region, and County. Of these, the issue we consider critical is Transportation Concurrency. There remain deficiencies in the RCWs, in implementation at the County and City level, and in the total lack of any enforcement mechanisms. These render Concurrency, though great in theory, moot in practice and not what it was intended to accomplish—infrastructure keeping up with growth.

We request you give due consideration to our detailed comments herein, as they represent the concerns of a vast majority of King County’s Rural Area. Thank you.

Peter Rimbos [primbos@comcast.net](mailto:primbos@comcast.net)  
Co-Coordinator, *VISION 2050*, GMVUAC

Mike Birdsall [mike\\_birdsall@yahoo.com](mailto:mike_birdsall@yahoo.com)  
Co-Coordinator, *VISION 2050*, GMVUAC

Nancy Merrill  
[epca.wa@gmail.com](mailto:epca.wa@gmail.com)  
President, EPCA

Gwyn Vukich  
[GVLHAssn@gmail.com](mailto:GVLHAssn@gmail.com)  
President, GV/LHA

Steve Hiester  
[info@gmvuac.org](mailto:info@gmvuac.org)  
Chair, GMVUAC

Michael Tanksley  
[wmtanksley@hollywoodhillassoc.org](mailto:wmtanksley@hollywoodhillassoc.org)  
President, HHA

Nancy Stafford  
[nm.staff@outlook.com](mailto:nm.staff@outlook.com)  
Chair, UBCUAC

cc: Dow Constantine, King County Executive: [dow.Constantine@kingcounty.gov](mailto:dow.Constantine@kingcounty.gov)  
King County Council: [council@kingcounty.gov](mailto:council@kingcounty.gov)  
John Taylor, Director, King County Dept. of Local Services: [john.taylor@kingcounty.gov](mailto:john.taylor@kingcounty.gov)  
Paul Inghram, PSRC, Director of Growth Management: [pinghram@psrc.org](mailto:pinghram@psrc.org)  
Ivan Miller, Comprehensive Planning Manager, King County: [ivan.miller@kingcounty.gov](mailto:ivan.miller@kingcounty.gov)

## EXECUTIVE SUMMARY

[\[https://www.psrc.org/sites/default/files/v2050-dseis-execsummary.pdf\]](https://www.psrc.org/sites/default/files/v2050-dseis-execsummary.pdf)

(pp. ES-7 - ES-19)

### Regional Geographies

We strongly support the PSRC's proposed new categorization system called: "*regional geographies*" to classify cities and unincorporated areas by roles and types:

- Metropolitan Cities
- Core Cities
- HCT (High-Capacity Transit) Communities
- Cities & Towns
- Urban Unincorporated Areas
- Rural
- Resource Lands
- Major Military Installations

This hierarchy better defines and more carefully recognizes the differences among such varied "*geographies*" and, thus, will allow a better allocation of resources to fill infrastructure needs.

### Alternatives

The three alternatives under study are:

- **"Stay the Course"** — *[a direct extension of the VISION 2040 Regional Growth Strategy and assumes a compact growth pattern, focused in the largest and most transit-connected cities in the region with designated regional growth centers.]—We believe this can and must be improved upon.*
- **"Transit Focused Growth"** — *[considers a compact growth pattern based on the VISION 2040 Regional Growth Strategy that assumes accelerated growth near the region's existing and planned transit investments in Metropolitan, Core, and High-Capacity Transit (HCT) Communities, with less growth in the outlying areas.]—We believe this offers the best opportunities for the region.*
- **"Reset Urban Growth"** — *[is based on VISION 2040 and shares similarities with actual growth patterns that occurred from 2000 to 2016 and assumes a more distributed growth pattern throughout the urban area, but with more growth in outlying areas.]—We believe this would be a major setback for the region and not set it on the right course moving forward.*

### Observations (ref.: Table ES-1. Summary Comparison of Alternatives to Stay the Course)

We recognize the three alternatives studied in the SEIS produce differing environmental impacts. While some impacts are similar for all the alternatives, some impacts are quite different, as summarized in Table ES-3 (pp. ES-16 - ES-19). What is most striking is that across all three alternatives, clearly the region, as a whole, will be less livable. That said, almost all the impacts are least worst for the "*Transit Focused Growth*" alternative. Further, the "*Transit Focused Growth*" alternative has the **Rural, Urban Unincorporated, and Cities/Towns** showing the least growth. Clearly, for our organizations, which want to reduce sprawl, keep the Rural Area rural, and limit outlying cities to less growth, the "*Transit Focused Growth*" alternative is most attractive.

We also are confused by the rationale to define the "*Stay the Course*" alternative as the "*no action*" alternative when the "*Reset Urban Growth*" alternative is a much closer fit to the trends of actual growth from 2000 to 2017, as explained in Appendix C: *Modeling Methodology and Analyses Tools*. We believe the "*Reset Urban Growth*" alternative should be defined as the "*no*

action” starting point and, then, assess the “*Stay the Course*” and “*Transit Focused Growth*” alternatives as points of departure from it—with the latter being more extensive than the former.

**Concerns** (ref.: *Table ES-2. Impacts Common to All Alternatives*)

Of the impacts common to all the alternatives we are concerned with the following specific impacts and for which long-term mitigation is critical:

*Population, Employment, Housing, and Land Use*

- *Population and employment growth in less-developed and rural areas would result in lower-density land uses and potential development pressures on natural resource lands*  
—What policies can be strengthened to minimize development activity in the Rural Areas and directly adjacent cities and towns?

*Transportation*

- *The average time people spend in congestion each year is forecast to increase*  
—What changes to the Regional Transportation Plan are needed to alleviate this outcome?

*Ecosystems*

- *Activities associated with development, including clearing, grading, vegetation removal, and conversion of land to impervious surface would have adverse impacts to ecosystem resources such as fragmentation and degradation of habitat*  
—This is a serious issue for the region for reasons such as salmon and orca survival, and must be mitigated by vigorous and continuous policy support.

*Water Quality and Hydrology*

- *Amount of impervious surface would increase as a result of added development, which may alter stormwater hydrology, reduce aquatic habitat, and degrade water quality*  
—This also is a serious issue for the region, and must be mitigated by vigorous and continuous policy support.

*Parks and Recreation*

- *For both local and regional parks, recreation, and open space resources, growth would lead to increased use, which could lead to degradation of the recreational experience, potential degradation of natural and open space resources, and increased conflicts between users*  
—As Rural Area residents already experience this impact regularly, what mitigation can be provided?

*Visual Quality*

- *Development in existing outlying and rural areas would potentially convert undeveloped spaces to other uses and may not be consistent with community visual character*  
—This is best mitigated by attention to prevention of such development in the first place (see Population, et al, above).

Our comments/questions above refer to mitigation due to the lack of meaningful mitigation discussed in the draft SEIS. There are general types of mitigation described in various tables, but no indication of any specific commitment to implementation, nor to the effectiveness of mitigation options. Such commitments should be part of the choice of alternatives.

**Advantages** (ref.: *Table ES-3. Summary Comparison of Alternatives Impacts*)

We see the following relative advantages for the “*Transit Focused Growth*” alternative as compared to the “*Stay the Course*” alternative, although the outcomes for both alternatives are will be dependent on the specific mitigations implemented:

### Land Use

- 6% (vs. 9%) of growth throughout the region occurs in proximity to urban growth boundary
- 75% (vs. 48%) of population and employment growth occurs near high- capacity transit

### Transportation

- Reduced average travel times

### Ecosystems

- Less growth to areas with regionally significant habitat, reduced impacts

### Water

- Less impervious surface added to region

### Public Services and Utilities

- Less growth in outlying and rural areas may reduce the need to construct or expand facilities near open spaces, decreasing impacts

### Parks and Recreation

- 59% of population would be near parks in 2050

### Visual Quality

- Less development in outlying and rural areas would slightly reduce negative impacts to these areas

## Introduction

[<https://www.psrc.org/sites/default/files/v2050-dseis-chap1.pdf>]

(pp. 1-8)

We support the following *specific* items from the Growth Management Policy Board's *VISION 2050* desired outcomes.

- ***“Climate.*** *Meaningful steps have been taken to reduce carbon emissions and minimize the region’s contribution to climate change.”*  
—Much more should be done in this direction.
- ***“Economy.*** *Economic opportunities are open to everyone, the region competes globally and has sustained a high quality of life. Industrial and manufacturing opportunities are maintained.”*  
—The Rural Areas do need more rural-centered economic opportunities, but not extensions of urban industrial activity into rural areas.
- ***“Innovation.*** *The region has a culture of innovation and embraces and responds to change.”*
- ***“Mobility and Connectivity.*** *A safe, clean, integrated, affordable, and highly efficient multimodal transportation system reduces travel times, promotes economic and environmental vitality, connects people, and supports the Regional Growth Strategy.”*  
—Yes, but *“pass-through”* urban-originated commuting traffic on county roads in the Rural Areas is a continuing issue, which has drastically strained County roads budgets to the point that normal maintenance has been adversely affected.
- ***“Natural Resources.*** *Natural resources are permanently protected, supporting the continued viability of resource-based industries, such as forestry, agriculture, and aquaculture.”*  
—In addition, we must not lose sight of mitigation and cleanup responsibilities we must ensure occur to restore areas that have been depleted or degraded.
- ***“Resilience.*** *The region’s communities plan for and are prepared to respond to potential impacts from natural hazards and other adverse events.”*
- ***“Rural Areas.*** *Rural communities and character are strengthened, enhanced, and sustained.”*  
—We fervently support this vision, but surrounding growth continues to build strong pressures on the Rural Areas.

## 2. Affected Environment

[<https://www.psrc.org/sites/default/files/v2050-dseis-chap2.pdf>]

(pp. 9-74)

We agree with the assessment of “*What are some of the key regional changes in the last decade?*” However, we would caution planners to recognize that “*Transit infrastructure around the region is expanding, and transit ridership is increasing*” is very locational-dependent. For example, in the outlying cities and Rural Areas of King County transit options are extremely limited or non-existent, yet there are many commuters that use the few main arterials available creating daily congestion far and wide.

### 2.1 Population (pp. 10-13)

In looking at *Appendix B*, the data that supports this section, it is difficult to discern what methodology and assumptions were used in developing population forecasts out to 2050, especially population distribution among cities. We remain concerned there is too much left up to subjective decisions. For example, how were growth targets used, if at all? This is important as some outlying cities in King County, e.g., Black Diamond and Covington plan to exceed their Growth Targets. In the case of the former, grossly exceed. For the latter, we understand PSRC already has imposed conditions as part of its certification of the city’s Comprehensive Plan. This is not where the PSRC or our organizations want to see growth, especially when it is not accompanied by jobs and transit, thus imposing even more pressure on already-strained existing transportation infrastructure and directly threatening the rural way of life.

### 2.2 Employment (pp. 14-17)

An issue not addressed is that today jobs in the Rural Areas, generally, do not pay enough for the residents of the community to be able to afford the housing, such that they must live and commute from outside the area.

We have a concern about heritage family businesses located in the Rural Areas. These family-run businesses help promote a strong and viable community. If over-development is allowed in the Rural Areas, then land values invariably rise to the point that these families have to sell their businesses and move. Resulting in the loss of family-run businesses to the local communities.

### 2.3 Housing (pp. 18-22)

The high cost of housing—affordability—is a critical issue for the region—as a whole. Quality of life is jeopardized to varying degrees for most families. It forces many to move farther away from their jobs and commute longer distances, which adversely affects the entire region.

In addition, in several urban areas, where there is a focused effort to accommodate density in downtown cores, a high *quantity* of individual units are being built, with not as much focus on *quality*—as in the kind of places people would want to live. There needs to be a better balance between *quantity* and *quality*, if accommodating more density is to work in the long run. Just adding more small units near transportation hubs cannot be the universal response to these efforts, if we want these urban villages to be desirable places to live for a variety of people.

### 2.4 Land-Use (pp. 23-31)

#### 2.4.1 Regional Land Use

Without the context of location, it is hard to assess the following statements:

*“Figure 2.4-3 shows parcel sizes in the region’s rural areas. The distribution of parcel sizes is similar to that in the VISION 2040 FEIS, showing that parcels smaller than five*

*acres are the dominant size and are located throughout the land designated as rural. Of the rural parcels that are less than 5 acres in size, about 60,000 are vacant, indicating the potential for substantial future rural development.”*

For example, where are those “vacant” “60,000 parcels” in the Rural Area? Which counties possess the most? We do not want, nor would we expect the PSRC to want, “*substantial future rural development.*” However, we do recognize and support that *legal* lots can be developed.

#### **2.4.2 Regional Growth Centers and Manufacturing/Industrial Centers**

We continue to support these Regional Growth Centers (RGCs), as they allow for both jurisdictions and businesses to better plan their land-use decisions. However, we remain quite alarmed that King County has designated Industrial-zoned sites in its Rural Area which are completely incompatible with the surrounding Rural Character and violate the intent and purpose of the Growth Management Act.

Regarding Figure 2.4-4 (p. 29) we do question whether some of the RGCs have efficient multimodal transportation options. It would help if the RGC map also included areas of high growth rates of housing and vehicular traffic. This would provide an early warning of potential problem areas.

#### **2.4.3 Transit-Oriented Development**

The trend towards more Transit-Oriented Development should continue, as it leads to the most efficient use of land and infrastructure funds.

### **2.5 Transportation (pp. 31-38)**

#### **2.5.1 Transportation System Capacity Improvements**

The first sentence under the section title states: “*The Regional Transportation Plan contains a variety of planned investments to increase mobility, both at the local and regional scale.*” It goes no further to explain this variety of planned investments or to confirm the level of confidence in obtaining these funds. Worse, there is no accounting for mitigation needs that should be added to the Regional Transportation Plan (RTP), approved in 2018, to offset the growth forecast for 2040 to 2050. An honest presentation of the major changes to the RTP that each alternative will require is a key piece of information needed to make an informed choice.

We remain extremely wary of the impacts of pass-through commuter traffic from cities inside the Urban Growth Area along inadequate and overwhelmed county roads in the Rural area to get to jobs in other cities in the Urban Growth Area. King County has insufficient funds to maintain its vast network of roads. This problem has been getting worse every year with no apparent solutions that satisfy all parties. Cities must help pay to maintain county roads their citizens and businesses use everyday.

#### **2.5.2 Transportation System Efficiency Improvements**

The first sentence under the section title states: “*Transportation system efficiency improvements include strategies for enhancing system efficiency and mobility without adding capacity to the system.*” We agree that simply adding more lanes is not a long-term solution, but solutions should be explored that encompass, by all means possible, the true goal: alternatives to driving alone.

While we support the efforts to shift trips out of peak-travel periods or eliminate the need for trips, it should be recognized there are requirements placed upon many people by their employers. In addition, when it comes to the Rural Areas—which we understand is a small percentage of the four-county population—employment opportunities are few and far between; consequently, asking many people to walk or take a bike to work, simply ignores reality. We suggest that a more helpful action would be to expand the commuter bus network so that people in Rural Areas and outlying Cities and Towns have real *alternatives* to driving alone. Such an



expansion should also provide for secure parking facilities as such commuters often have to travel long distances to catch a bus.

The draft *VISION 2050* SEIS appears to place all adaptability and responsibility on the individual citizen, but employers too must be adaptable.

We support advancements in transportation, but it is difficult to assess potential impacts of untested technology that is not in common usage at this time.

## **2.6 Air Quality and GHG Emissions** (pp. 39-42)

### **2.6.2 Greenhouse Gas Emissions and Climate Change**

There are several listings of GHG emission reduction targets adopted by King County, PSCAA, and the State, yet they all differ. Although the PSRC has no control over such legal decisions by various jurisdictions and agencies, it must be recognized that such differing targets not only do not support each other, but probably will not stem the worst effects of human-accelerated climate change.

Further, the Regional Transportation Plan's (RTP's) *Four-Part Greenhouse Gas Strategy* is being systematically undermined by the Federal government's rollback of fuel economy and greenhouse gas standards for passenger vehicles and trucks.

## **2.7 Ecosystems** (pp. 43-48)

### **2.7.3 Relevant Plans, Studies, and Court Rulings**

Although the following statement generally is true:

*"Toxic chemicals are concentrating in the water and entering the food chain. Low oxygen caused by nitrogen discharged from septic tanks, sewage treatment plants, and other sources threatens Puget Sound."* (p. 46)

We would like to have reflected here that there is no known data or correlation between onsite sewage systems in the Rural Areas and 'low oxygen' levels in regional surface waters, including Puget Sound. Proper location, operation, and maintenance of onsite sewage systems do not contribute to this issue, and any statement or assertion to the contrary should be corrected. [Please note: SB 5503, Section 1, signed by Governor Inslee on April 17, 2019, and effective July 28, 2019 (Laws of 2019, Chapter 50).] With the Rural Areas growing so slowly, as the GMA intended, *VISION 2050* should not recommend any additional restrictions or limitations being placed on onsite sewage systems located in the Rural Areas.

### **2.7.4 Climate Change**

We share concerns expressed here in terms of adverse impacts to wildlife habitat, forests, biodiversity, and water acidification and how this will affect Rural Area ecosystems and residents.

## **2.8 Water Quality and Hydrology** (pp. 48-53)

### **2.8.1 Impervious Surfaces**

The last sentence of the first paragraph states: *"In addition, redevelopment of areas with outdated stormwater infrastructure can result in improvements to water quality through upgrades and improvements to stormwater management."* We would add: *", including emphasizing conservation and redirection (or repurposing) of water flows to wetland and wildlife basins to promote water resource recycling, cleaning, the recharging of the aquifer, and for natural areas, parks, and/or recreation purposes."*

Currently, a high percentage of impervious surface area run-off is piped away and discharged quickly into corridors which flow to the sea and provide little for wildlife. Also, there are conflicting use pressures along critical water supply corridors, such as the location of industries along the

Cedar River corridor in the Rural Area which remove existing vegetation and add impervious surfaces.

### **2.8.3 Policies and Regulations**

We believe the recently established Watershed Restoration & Enhancement (WR&E) Committees are a good idea, if these efforts reasonably address and protect the use of groundwater in the Rural Areas for single-family homes and small farms (see: <https://ecology.wa.gov/Water-Shorelines/Water-supply/Streamflow-restoration/Streamflow-restoration-planning>). Unfortunately, Rural Area residents have been excluded from these WR&E Committees which will directly affect watersheds in which they live and unfairly overpopulate these Committees with urban representation. Although this is a State issue, the PSRC could exert influence in the region to ensure the public is fully represented in such planning activities, as these issues will only be exacerbated with the influx of so many more people into the region, especially where large municipal groundwater withdrawals for water supply far exceed and, in fact, *compete* with residential use in the Rural Areas (e.g., City of Kent well field in the Maple Valley “Four Corners” area).

## **2.10 Parks & Recreation (pp. 56-61)**

### **2.10.5 PSRC Regional Open Space Conservation Plan**

We participated in the review and comment on the PSRC Regional Open Space Conservation Plan and support it.

## **2.11 Environmental Health (pp. 61-64)**

We remain concerned about contaminated sites in the Rural Areas and the intent to grant permits for isolated Industrial-zoned parcels in the Rural Area, especially in King County where a major asphalt facility is being moved from inside the Urban Growth Boundary (the City of Covington) to the Rural Area along the Cedar River. Urban or Urban-serving facilities have no place in the Rural Areas simply because the land may be less expensive to the permit applicant.

## **2.13 Historic, Cultural, & Archeological Resources (pp. 66-67)**

The viability of historic, cultural, and archaeological resources is increasingly at risk due to injudicious and often ill-considered development throughout the Rural Areas. Among many examples is the King County-designated Green Valley Road Heritage Corridor, one of nine such Roads and home to the Neely Mansion, listed on the National Register of Historic Places. Massive developments are planned and construction has begun in the adjacent Urban Area. Although only in its nascent stages, the resulting impacts have caused and will continue to cause undue pressures on these unique and beloved community landmarks. Such imprudent development results in increased traffic, difficulty in accessibility and other issues which include safety concerns, that place the viability of such exceptional cultural/heritage and tourist venues at risk. This area is also home to one of five King County-designated Agricultural Production Districts (APDs), all of which also have significance as cultural and historic venues, especially intergenerational family farms. Plans for motorsports racetrack expansion adjacent to the historic Soos Creek Salmon Hatchery will place further undue hardship on nearby areas.

We strongly support careful consideration of all areas adjacent to the urban fringe. We also urge limits on development and careful consideration in planning and permitting in localities where there is close proximity and/or impacts to King County-designated Heritage Corridors, APDs and increasingly-endangered Rural Area historic, cultural and archaeological resources.

We find very few Rural Area sites identified in *Figure 2.13-1. Historic Sites* (p. 67). There is no lack of eligible venues, e.g., there are a number of agricultural buildings in the Greater Puget

Sound area that date to the 19th century. One of the oldest buildings in King County is an 1879 barn along the Green Valley Road Heritage Corridor built by one of the earliest settlers in SE King County. Unfortunately, especially in the unincorporated areas, there is a general lack of funding to designate buildings, sites, and areas as places of historic significance.

#### **2.14 Visual Quality** (p. 68)

In the Rural Areas, Visual Quality is very important to local residents, as well as visitors from Urban Areas. Often, if high quality is lost, it is difficult or impossible to retrieve. Coordination with Rural Area residents—who are most familiar with and have interest in preserving visual quality—when changes are being planned, would help preserve high quality from unfortunate loss to all.

#### **2.15 Earth** (pp. 68-69)

*Figure 2.15-1. Regional Geologic Hazard Areas* (p. 68) appears to be incomplete. Rural Area residents have experienced flooding along the Cedar River between the cities of Renton and Maple Valley; there are many more fault lines that we have gathered from multiple sources; and the Cedar River canyon's steep slopes have recently experienced multiple landslides directly impacting SR-169. Yet, none of this is indicated on the map.

#### **2.16 Noise** (p. 70)

There is no discussion of noises common to the Rural Areas and its impact on residents and the surrounding environment.

Unfortunately, the following section (2.17) does not even mention noise regulations adopted since VISION 2040, further prompting a need to look at whether current regulations are appropriate and address the increased noise from new development and traffic congestion in both the Urban and Rural Areas.

However, in the Rural Areas the biggest concern is *enforcement*. Noise complaints from Rural Area residents yield very little relief. In King County, Public Health ignores noise as a detriment to health; the Sheriff's Office doesn't prioritize enforcement of existing laws; government representatives at all levels pass noise limits, but then do not adequately fund enforcement; and the Department of Local Services Permitting Division continues to allow housing in high-noise areas (e.g., along highways or busy thoroughfares), or allows high-noise commercial operations in/near residential zoned areas (e.g., Pacific Raceways, Buckley Recycling, Asphalt Plants, etc.).

Such problems could be rectified by requiring mitigation on the permitting of any noisy business that calls for minimizing noise impacts on nearby residential areas with physical noise walls, hours of operation, etc. Annual business license approvals would help ensure such mitigation is being properly followed.

#### **2.17 How Has the Regulatory Setting Changed Since VISION 2040?**

We remain concerned that not *all* city Comprehensive Plans have been updated since 2008. A case in point is the City of Black Diamond, which is planning to quintuple in population in the next 10 to 15 years, yet still hasn't completed its "2015" Update to describe how it plans to accommodate such mega-growth and its adverse impacts on neighboring communities.

### 3. Alternatives Evaluated

[<https://www.psrc.org/sites/default/files/v2050-dseis-chap3.pdf>]

(pp. 75-96)

In reviewing the opening of this chapter and how growth projections were developed, we remain troubled by how inconsistently growth management principles are applied across King County. For example, there are some cities that are not meeting their Growth Targets, while there are others that plan to exceed (or grossly exceed) their Growth Targets.

Numerically, these might cancel out, but desirable growth and where it can be best accommodated is very *location dependent*. To reduce sprawl and ensure the best use of infrastructure monies, it is desired to ensure that cities near major employment centers and best served by transit at least meet their Growth Targets, if not exceed them; while cities far from major employment centers and least served by transit should not exceed (or worse, grossly exceed) their Growth Targets.

Unfortunately, this is not happening and policies should be re-evaluated to see what can be done to ensure the desired outcomes as outlined in the overall regional growth strategy.

#### 3.1 How the Alternatives Were Developed (pp. 77-85)

The information in Appendix C: Modeling Methodology and Analysis Tools relies on a series of many key assumptions. While we understand that making assumptions is part of such modeling and analyses, it should be recognized, possibly through a series of sensitivity studies, how dependent some of the results thereof are to small changes in such assumptions. For example, population growth and job growth assessments were made using sophisticated models and tools, but according to a variety of assumptions about how those models would be exercised. While we understand many assumptions are made when developing/running models and conducting analyses, what is lacking is sufficient information to allow a reader to understand the *scope* of those assumptions, and the *range* of possible alternative assumptions. Consequently we recommend the following questions be addressed:

1. What is the minimum/maximum development capacity in each of the regional geographies?
2. What would be the maximum range of alternative growth patterns?
3. How confident can we be that each alternative would materialize under current policies and plans?
4. What new or changed policies and/or legislation is needed to achieve the vision provided by each alternative?

#### 3.2 Stay the Course (No Action Alternative) (pp. 85-87)

Clearly, the current *“course”* does not work for existing growth and would be even worse for the projected growth coming to the area. Therefore, maintaining that same course into the future is not a strategy we would support.

#### 3.3 Transit Focused Growth Alternative (pp. 87-89)

We believe this is by far the best alternative in terms of transportation infrastructure efficiency, quality of life, environmental impacts, and economic development—the *“best bang for the buck.”*

#### 3.4 Reset Urban Growth Alternative (pp. 89-91)

It appears this alternative describes a continuation of historical trends which lead to inefficient sprawl. This actually is contrary to adopted regional plans. Further, to accommodate the projected growth to come, this alternative would result in much worse sprawl than contemplated by the

Growth Management Act. Consequently, we do not support it. The fact that historical trends to 2017 are in opposition to regional plans gives abundant proof that stronger *policies* and legally empowered *enforcement* are needed.

### 3.5 Alternatives Comparison (pp. 92-96)

The graphics herein directly support our statements above on the three alternatives. However, we note that none of the alternatives includes any factual mitigation for the impacts of growth added beyond 2040. The discussion of potential mitigation measures in Chapter 4 is quite generic and lacks many factual specifics. We recommend specific mitigation measures be included, especially in the area of transportation facilities and services to accommodate growth. Otherwise, it appears the region will continue to grow for another decade after 2040 with no offsetting mitigation and quality of life will suffer for all citizens as a result. The Growth Management Act requires that mitigation be provided as growth occurs.

As previously stated, there is no attention to the critically important issue of policy enforcement, to assure that Growth Targets are actually met and that mitigation actually occurs. None is more important than the matter of Concurrency under the Growth Management Act. We view Concurrency as practiced today as ineffectual and failing to achieve the intended result of *“mitigation concurrent with development”* in any practical sense. There needs to be a new direction for impact fees and Concurrency, probably established through State legislation. PSRC could serve the region well by developing such a new direction and working with the State legislature to make appropriate Growth Management Act changes. We see the need for State action on Concurrency as critical and long overdue.

In the long run we would like to see the following further improvements:

1. Transportation: Strive to decrease the percentage of trips made by driving alone, while increasing opportunities for walking, biking, and transit.
2. Water Quality & Hydrology: While we understand that water quality may suffer, unless adequately protected, with more population, we do need to make certain there is enough water period. Water supply in several areas (e.g., Ravensdale) is limited by a low water table with many wells going dry during a hot summer. We need to ensure water quantity and quality will be adequate in the Rural Areas 30 years out.
3. Parks and Recreation: Growth already is leading to *“degradation of the recreational experience, potential degradation of natural and open space resources, and increased conflicts between users.”* This is already occurring and directly affecting rural residents, such as in and around Tiger Mountain, where neighborhoods have been overtaken by urban recreational visitors and pass-through commuters—and it is getting worse each year. All counties, especially King County, must recognize the significance of the problem and budget accordingly to support the needs of rural residents. Or, *“to protect rural residents from unwelcome impacts of urban growth not properly mitigated.”*

## 4. Environmental Effects and Mitigation

[\[https://www.psrc.org/sites/default/files/v2050-dseis-chap4.pdf\]](https://www.psrc.org/sites/default/files/v2050-dseis-chap4.pdf)

(pp. 97-156)

### 4.1 Population, Employment, and Housing (pp. 97-107)

#### 4.1.1 Analysis of Alternatives

##### 4.1.1.1 Impacts Common to all Alternatives

##### 4.1.1.2 Comparison of Alternatives

Figure 4.1-1. *Jobs-Housing Index, 2050* [p. 100], shows the Job-Housing Index's (JHI's) between the two "alternatives" to "Stay the Course" path are nearly identical (i.e., 1 - 2 percentage points difference—within the "noise" level of the assumptions). Whereas it's the "Stay the Course" path that has a measurable and, possibly, significant difference. But that difference exclusively favors King County at the expense of the other three counties, especially Kitsap (which, according to Table 2.3-1 [p. 19], is almost all dominated by single-family housing: 87% vs. KC's 56%).

So, at least from this JHI metric, the long-term economic vitality of those three counties could be improved by striving toward the paths laid out in the two alternatives.

In the *Job-Housing Balance* metric it is not explained how a home is used, or whether there is a home occupation or home-based industry. We believe this could affect this metric, at least as its is evaluated in the Rural Areas.

##### 4.1.1.3 Impacts of Stay the Course (No Action Alternative)

It is alarming to see this alternative's large deficit of moderate-priced housing in King County, because it implies enormous pressure on the Rural Areas, especially developable lands near the Urban Growth Boundary, to supply that demand in King County rather than necessarily divert it to other counties. The result is likely to be further violation of planned growth targets, and a continuation of the sprawl that occurred from 2000 to 2017. To avoid such sprawl, strong growth-control measures must be enacted.

##### 4.1.1.4 Impacts of the Transit Focused Growth Alternative

This alternative's distribution of growth by density is far preferable to *Stay the Course*, due to its smaller share of low-density housing and, thus, lessened impacts on the Rural Areas. However, as noted elsewhere, the numbers in Table 4.1-2 are merely assumptions. There needs to be an *enforcement plan* to assure that growth will be channeled in this direction, contrary to all past history.

##### 4.1.1.5 Impacts of the Reset Urban Growth Alternative

At 33% low-density growth in King County, this alternative is the least desirable for the region and clearly so for the Rural Areas, where much more development would occur, in conflict with the desires of rural communities. Yet, this alternative is quite likely to materialize, because it reflects the reality of past trends. No matter what land use "vision" is adopted, this is what the marketplace will produce, unless the marketplace is guided by stronger legislation than now exists. There needs to be a *mitigation plan* to produce better outcomes than the region has seen in the recent past.

#### 4.1.2 Cumulative Effects

We agree with the broad conclusion that: "*the contribution of growth to climate change is inversely proportional to the compactness and density of new development.*" This provides further rationale for our support for the *Transit-Focused Growth* alternative.

#### 4.1.3 Potential Mitigation Measures

Table 4.1-4. *Potential Mitigation Measures: Housing and Employment* (pp. 105-106) incorporates seemingly every desirable strategy that might have merit. As elsewhere, we ask for realism. For example, which of these mitigation strategies:

1. Will have the most benefit to the regional plan?
2. Will receive *tangible* priority when PSRC interacts with local governments?
3. Require changes in state law or local codes to be enforceable?

The track record of actual development patterns is clear: the regional plan for distribution of new housing and jobs is not being followed by the marketplace. Plans can be put in place to help change that trend.

We would add the following bullet to the part of Table 4.1-4 labeled “*Topic: Support Regional Economy and Employment*”: “*Provide a supportive environment for business start-ups, small businesses, and locally owned businesses.*” People who start a home-based business often do so because they have a passion for a particular area of interest. They have a need to create for themselves an income and a lifestyle, with some level of comfort. They do not necessarily exist just to provide “*family wage jobs.*” In the case of building a business, misdirection, interference, and indifference in the community could result in the small business owner deciding to pack-up and leave for a better business environment.

## **4.2 Land Use** (pp. 107-117)

We first provide some *general* comments. We appreciate the identification of rural lands as subject to adverse impacts under all alternatives due to unwanted development. While this may seem a minor side-issue to the region as a whole, it is a critical issue to rural residents. To avoid urban growth spilling over into the Rural Areas, the region should develop effective enforcement policies, or rural land will be irrevocably lost to the detriment of all.

Further, we have major concerns with the progress and success of past regional plans. Clearly, the “*Stay the Course*” alternative simply is the extension from 2040 to 2050 of the adopted 2040 regional plan policy principles *for allocating regional growth down to local areas*. Thus, it is called the “*no action*” alternative. The other two alternatives are variations thereof, designed to show what could happen if the *VISION 2040* plan is modified in certain ways.

The “*Reset Urban Growth*” alternative represents the continuation of actual growth patterns observed 2000-2017, which have not followed the guidance of regional plans. There is much more development happening in the small cities and towns (Covington, Maple Valley, Black Diamond, etc.) and the unincorporated areas than the regional plan intends, and less growth than planned is happening in the denser core cities.

So, “*continuing existing trends of growth*” could be called the “*no action*” case in practical terms and the “*Reset Urban Growth*” alternative could be viewed as the “*baseline*” case. In this way, the “*Stay the Course*” alternative represents a set of policies to pursue some transit-oriented development as planned in the currently adopted *VISION 2040* and the “*Transit Focused Growth*” alternative as a still more transit-focused growth plan.

One last point, since current development trends result from market realities, the planned alternatives envisioned will not happen unless the market gets shaped by much stronger controls on development than currently exist. Unfortunately, the “*Reset Urban Growth*” alternative is most likely to happen based on current market forces and that concerns us greatly.

### **4.2.1 Analysis of Alternatives**

#### **4.2.1.1 Impacts Common to all Alternatives**

We strongly concur with in the general statement” “*some cities and counties may require updates to policies and regulations to accommodate the action alternatives or achieve the growth pattern in Stay the Course.*” Strong enforcement actions are called for in all cases, but we see little herein to give hope that such will occur.

We applaud the description of possibly adverse impacts on Rural Land if urban growth goals are not met. We recommend changing: “*could potentially impact existing rural character ...*” to:

*“will adversely impact existing rural character ...”* Similar concerns apply to Natural Resource Land and Critical Areas.

#### **4.2.2 Cumulative Effects**

We see major concerns here:

*“As noted in the VISION 2040 FEIS, local jurisdictions may face challenges in improving their transportation and other infrastructure and facilities to accommodate planned growth. They also may face challenges with updating land use plans and regulations to support the anticipated growth pattern. If adequate infrastructure is not provided, this growth may lead to increased low-density development outside of the urban areas and into rural areas. If adequate levels of affordable housing are not provided in urban areas, this could also lead to undesired sprawl in rural areas. Likewise, if adequate zoning capacity to support growth is not available in urban areas, it may lead to greater development outside of the urban area. If Rural and Resource Land geographies lack land use protections, greater development of those lands than anticipated by the growth alternatives may occur.”* (p. 115)

Yes, local jurisdictions currently do and in the future will continue to face infrastructure and facility challenges. However, that is solvable if they would exercise their authority to ensure that new growth pays for new growth—that has not been happening as they have fallen further and further behind. This clearly is a failure to enforce GMA Concurrency—especially Transportation Concurrency. Should such failures by the cities occur, they should not serve as the rationale underlying any further enlargement of the Urban Growth Areas, especially with so many existing Potential Annexation Areas left un-annexed.

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

Regarding Table 4.2-1 (p. 116) under *“Topic: Rural Lands, Resource Lands and Critical Areas”*:

Examples should be provided to support: *“Promote programs that support rural based economic development consistent with rural character.”*

The following is not clear: *“Provide for agricultural-related accessory uses on agricultural lands.”* We believe most of the acreage in the Rural Areas is zoned with a multitude of accessory uses already in the zoning code.

We see no practicality, nor desire, to implement the following mitigation measure listed in Table 4.2-1 (p. 116): *“Reduce allowed densities in rural areas outside of clustered development and areas where growth is desired.”* First, we do not support the urban-concept of *“clustered development”* in the Rural Areas. Second, implementing such measures as *“reduce(d) allowed densities”* would take major changes in zoning law, planning policies, regulations, etc. We support instead the mechanism of Transfer of Development Rights (TDRs).

Also in Table 4.2-1 (p. 116): *“Partner with nongovernmental organizations to preserve natural resource lands.”* We would like to see promotion of home-based occupations that are consistent with the Rural Area lifestyle and environment. The transfer of development rights (TDRs) from the Rural Area to existing Urban Areas should result in an overall *lesser* impact to the Rural Area. Use of private wells for single-family residential water supply in the Rural Area should: (a) continue to be exempt under and pursuant to RCW 90.44.050 and (b) not be subject to regulation, restriction, or limitation resulting from the State Supreme Court’s *Hirst* decision and/or the legislative fix implemented under and pursuant to Ch 1, Laws of 2018 (ESSB 6091). Properly located, operated, and maintained onsite sewage systems in the Rural Area do not have an adverse impact on the water quality and biosystem of regional surface waters and Puget Sound, and thus should not be subject to any additional mitigating measures. Again, please note: SB 5503, Section 1, signed by Governor Inslee on April 17, 2019, and effective July 28, 2019 (Laws of 2019, Chapter 50).

### **4.3 Transportation (pp. 117-124)**



We first provide some *general* comments below:

1. State, County, and local governments must commit to enforcement of existing Growth Management Act (GMA) provisions, especially Transportation Concurrency, or the State should make enforceable improvements to the GMA;
2. Lack of an effective enforcement mechanism makes this mostly moot as a planning tool. Plus, invalid Growth Targets create false assumptions;
3. Inaccurate (e.g., using unrealistic assumptions or conducting at too high a level) traffic analyses create false assumptions;
4. Lack of a mitigation plan that identifies major regional capacity and system improvements to go along with the decade of growth that is assumed and evaluated; and
5. Rural Area residents are not included on the PSRC boards (or are “*represented*” by County Councilmembers, who primarily live in urban areas), leading to under-representation in the planning process.

#### **4.3.1 Analysis of Alternatives**

##### **4.3.1.1 Impacts Common to all Alternatives**

On p. 119, there are four bullets under the sentence: “*The following geographic trends are similar across all alternatives..., it is anticipated that by 2050:*” The fourth bullet states:

*“People who live in Cities & Towns and Rural regional geographies travel the longest distances, spend the most time in a car each day, and spend the most time per year in congestion. This is due to dispersed land development patterns in these areas, greater distances to major job centers, and reduced access to transit.*”

Yes, this is true, but more fundamentally, we believe it is due to weaknesses and “*loopholes*” (e.g., Level of Service Standards [LOSs] can be changed—“*moving the goalposts*”—and Highways of Statewide Significance [HSSs] are not subject to concurrency testing—we have spoken to State legislators who, inexplicably, did not know this was part of the HSS definition) in State Growth Management Act (GMA) Concurrency. We already have a tool that can be made to work, if it were improved and enforced. Further, we decry the practice of lowering LOS standards to *artificially* limit the apparent need for mitigation. We support the concept of expanding the transit system to provide people in low-density areas with an alternative to driving alone.

##### **4.3.1.2 Comparison of Alternatives**

The differences between the three alternatives is not all that great, but each are markedly better (especially the Table 4.3-2 [p. 120] “*job accessibility*” comparisons) than the “*baseline*” which represents our recent (2014) current situation. Unfortunately, this shows that our current situation is quite intolerable.

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

In Table 4.3-3 (p. 123) we see no new potential mitigation measures that would have appreciable effects on the region’s transportation infrastructure, nor its efficiency. More specifically, we provide the following comments on some of the 20 unnumbered bullets (which we numbered for clarity) below:

#4 – “*Adopt and implement policies that reduce the impacts of growth.*”

—We recommend vigorous enforcement of Transportation Concurrency, yet such mechanisms do not seem to be in place. More importantly, concurrency would be largely unnecessary as a tool, if funding were adequate for *true mitigation* of all impacts without diluting the LOS standards.

#13 – “*Leverage data to improve understanding of system performance, resources, and program benefits.*”

—We believe this needs further explanation, e.g., are there better data analysis tools to be explored? Are there better criteria?

#16 - “Encourage cooperation between transit agencies and shared mobility providers (e.g. Uber, Lyft, Car2Go, and ReachNow) to improve first- and last-mile connections and expand mobility.”

—We believe this means that, due to an incomplete route, people would have to call a ride to get them the last 6 blocks, or mile or two to their final destination. We see this strictly as an urban problem that would have little application in the Rural Areas unless there is a corresponding increase in transit service to and from the Rural Areas.

#### **4.3.5 Significant Unavoidable Impacts**

This presupposes that jurisdictions properly enforce Transportation Concurrency, which they do not. It also neglects to acknowledge the built-in loopholes in GMA Transportation Concurrency, such as allowing a jurisdiction to simply *change* its Level of Service standards (e.g., “*move the goal posts*”). Finally, as long as Highways of Statewide Significance (HSSs) are exempt from meeting Transportation Concurrency, it will be nearly impossible to solve problems arising from ever-increasing traffic volumes.

#### **4.4 Air Quality** (pp. 124-127)

Pollutant emissions are reduced with all alternatives. The principal observation is that each pollutant is reduced from the base year to any of the future alternatives, and there is little distinction to be found between the future alternatives *per se*.

Unfortunately, the contribution to greenhouse gases (GHGs) is not reduced very much compared to other pollutants. We support measures that more strongly mitigate the effects of climate change. For example, the State government is now debating a goal of zero GHG emissions from electric power generation within a shorter time horizon than 2050. Such a similar goal could be adopted for transportation emissions by 2050. The automobile marketplace is already transitioning to electric vehicles. A regional policy goal of zero fossil fuel consumption by 2050 seems quite achievable. That would, in turn, tend to support more compact, transit-oriented patterns of urban development and lessen the appeal of commuting between rural homes and urban jobs.

#### **4.5 Ecosystems** (pp. 127-133)

As with other topical areas, the *Transit-Focused Growth* alternative is preferred, because of its lessened impacts on ecosystems in the Rural Areas, urban unincorporated areas, natural resource lands, and critical areas.

#### **4.6 Water Quality and Hydrology** (pp. 133-138)

We recommend that the description of sea level rise with all alternatives more realistically recognize the science by changing: “*may experience*” to: “*will experience*” given the strong scientific consensus on climate change and, in fact, an alarming acceleration of concern about sea level rise in recent scientific publications (see any *Scientific American* for example). The news is not good. This, in turn, calls for a vigorous adjustment of regional plans to mitigate and reflection of true costs of adaptation to transfer development demand away from such areas.

#### **4.7 Public Services & Utilities** (pp. 138-141)

We concur with the summary statement that the *Reset Urban Growth* alternative: “*has increased potential for the need to expand infrastructure and facilities into areas not currently*

served.” However, we would change: “*has increased potential*” to: “*will increase.*” It is far preferable to bolster the capacity of *existing* infrastructure in the Urban Growth Areas than to spread new infrastructure into Rural Areas.

Currently, we have major concerns with the Cedar Hills Landfill as it reaches capacity. While the potential mitigation measures listed under Solid Waste in Table 4.7-1 (p. 141) are good, they could prove to be insufficient to handle the influx of so many more people and jobs into the region—with most going to King County, thus adversely impacting the landfill operations.

#### **4.8 Parks & Recreation** (pp. 142-146)

We concur with the finding that the *Transit-Focused Growth* alternative provides the most access to parks for urban residents. We also concur with the discussion applicable to all alternatives that regional growth inevitably leads to increased demand on both urban and rural parks and recreation facilities. We are especially concerned about the increased impact on Rural Areas of urban residents accessing wild open spaces and other recreational facilities situated in Rural Areas. This calls for more regional support for facility improvements in the Rural Areas, since that cost burden should not be placed on the rural residents. Another possible mitigation strategy is to expand park and recreation facilities within the Urban Growth Areas, so as to shorten travel distances to reach such facilities and keep more such travel within the urban area.

##### **4.8.2 Cumulative Effects**

We are concerned by the statement that: “*population growth and associated development may limit available land for development of parks, open space, and recreational facilities, creating competition for available land and higher land costs.*” To mitigate this adverse impact, we suggest the Urban Growth Areas place a first priority on setting aside sufficient land for new parks, et. al. *before* the development happens.

This could have huge benefits for the future quality of life, if the will can be found to make the right decisions in the present. In fact, while some low-density residential areas in core cities are potential targets for high-density redevelopment, we recommend an effort be made to set aside some such areas to reclaim to lost open space in urban areas due to the lack of foresight by prior generations. For example, create new linear parks along urban streams to both provide recreational opportunity and restore some ecosystems at the same time that the surrounding low-density suburban areas become candidates for higher-density re-development.

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

The potential mitigation measures in *Table 4.8-1. Potential Mitigation Measures: Parks and Recreation Resources* (p. 145) allude to such strategies, but what is needed is firm direction with strong enforcement.

#### **4.10 Energy** (pp. 149-151)

While the differences between the alternatives are small, more importantly are the overarching concerns about climate change, which affect all alternatives.

#### **4.11 Historic, Cultural, & Archeological Resources** (pp. 151-152)

We strongly urge that outcomes from issues such as population increases and associated effects not be viewed as “*unavoidable adverse impacts,*” but addressed as concerns that can be effectively managed to preserve the Rural Areas’ many historic, cultural and archeological (HCA) resources.

We support the Mitigation Measures listed in *Table 4.11-1. Potential Mitigation Measures: Historic, Cultural, and Archaeological Resources* (p. 152) and reproduced below. However, we

believe they need to be strengthened, as well as equally and effectively enforced to avoid potential waiving of requirements.

- *Use local planning and zoning techniques to identify and protect historic and cultural resources\**
  - This is necessary, but not sufficient due to undue growth pressures on the urban fringes near such HCA resources.
- *Provide tax incentives to encourage preservation and rehabilitation of historic and cultural resources\**
- *Use fee simple acquisition or protective easements to control historic and cultural resources\**
  - This also should include seeking and identifying HCA resources that have been overlooked or neglected.

The region's Urban Growth Area boundaries adjacent to the Rural Areas, Heritage Corridors, and Agricultural Production Districts should be considered *inviolable*. We request a thorough deliberation and regard for proximity and impacts to HCA resources in all planning and permitting processes and urge that all measures be taken to protect and preserve these irreplaceable resources that attract tourism and give our communities a vital sense of identity and pride.

#### **4.12 Visual Quality** (pp. 152-153)

We support the *Transit-Focused Growth* alternative with respect to lessened impacts on Rural Areas. We support the potential mitigation measures in *Table 4.12-1. Potential Mitigation Measures: Visual Quality* (p. 153). As elsewhere, we see the need for increased enforcement power through proper legislation.

#### **4.14 Noise** (pp. 154-155)

We support the *Transit-Focused Growth* alternative with respect to lessened impacts on Rural Areas. We support the potential mitigation measures in *Table 4.14-1. Potential Mitigation Measures: Noise* (p. 155). As elsewhere, we see the need for increased enforcement power through legislation.

## 5. Environmental Justice

[<https://www.psrc.org/sites/default/files/v2050-dseis-chap5.pdf>]

(pp. 157-178)

Certain populations are addressed here as meriting careful attention for impacts and appropriate mitigation—and we agree. Due to the adverse impacts of urban development on the Rural Areas, we believe “*rural residents*” should be considered as well. Such impacts are only alluded to and not fully described in the draft SEIS.

To rural residents this is an important issue. The siting of urban urban-serving facilities in the Rural Area because the land is cheaper flies in the face of all State policies, as well as both regional, and county plans.

Urban dwellers increasingly use rural recreational features as if they were city parks, clogging access roads and intruding upon rural neighborhoods.

Urban dwellers increasingly use rural roads for commuter routes as bypass alternatives to severely overloaded urban arterial corridors. No urban neighborhood would tolerate such “*cut-through*” traffic and major cities have extensive programs of traffic management to deter such behaviors. Yet city-to-city traffic cuts through the Rural Areas every day, seeking a way around the congested urban corridors.

Unfortunately, these facts go unnoticed and unmitigated by the various planning processes in place that allow such deviations to occur without mitigation, and then proclaim that the forecast travel demand on the major arterial corridor has been adequately planned. Rural Areas will be increasingly threatened until such effects are recognized and mitigated as a matter of justice.

## 6. Multicounty Planning Policies

[<https://www.psrc.org/sites/default/files/v2050-dseis-chap6.pdf>]

(pp. 179-181)

### 6.2 Multicounty Planning Policies and Potential Updates

We reserve comments until proposed changes are publicly released, as stated below (p. 180):

*“For each topic area, Chapter 7 of the VISION 2040 FEIS summarizes the multicounty planning policies and describes their purpose and environmental effects. Input to date indicates that VISION 2040’s policies provide a strong foundation and should be largely retained, with select updates for emerging policy areas and changing conditions. Some changes are also proposed to strengthen or clarify policies. The multicounty planning policies will be revised to be consistent with the preferred Regional Growth Strategy alternative selected by the Growth Management Policy Board and will be included with the draft plan when it is released in summer 2019.”*

As Multicounty Planning Policies provide “a common, coordinated policy framework,” we request the Public be given sufficient time to review and comment on same and how they support the Regional Growth Strategy.

## APPENDICES

### B — Supplemental Data Tables and Figures

[<https://www.psrc.org/sites/default/files/v2050-dseis-appendixb-suppdattables.pdf>]

Issaquah is a designated regional growth center. This designation tends to increase trends for traffic growth between Issaquah and areas to the south, both rural and incorporated cities. But PSRC's Regional Transportation Plan (RTP) lacks any improvements to transportation capacity in that north-south corridor to serve such travel. The existing transportation infrastructure is overburdened as a result. Rural Area residents are made to pay the price for urban growth. Finally, King County has insufficient roads "maintenance" budget to accommodate all the urban pass-through commuter traffic on such "county" roads.

Average Annual Vehicle Delay Hours per resident increases with all three alternatives. This is apparently related to the absence of sufficient mitigation measures. In percentage terms, Rural Area residents are the most adversely affected. This relates to the absence of capacity improvements in the urban commuter corridors, whether road capacity or transit capacity.

Transit boardings are, of course, highest with the Transit-Focused Growth alternative, that the difference from the Stay the Course alternative is only 5%, hardly a dramatic shift. This emphasis, within the urban areas, apparently links to the lessened growth pressure on rural areas. However, this must be assured. The methodology indicates that planners simply assume less growth in Rural Areas, not that the Transit-Focused Growth alternative actually will be effective in achieving that goal. Policies and laws to assure such trends should be identified. Top candidates include firm enforcement of Growth Targets for all areas, and enhanced transit service linking the Rural Areas with urban jobs.

The share of commute trips by mode indicates a dramatic shift toward walking and bicycling to work by 2050. The Single-Occupant-Vehicle (SOV) share drops markedly as a result. Still, given a near 50% population increase between 2014 and 2050, total trips on the road still increase around 25%-30%. More cars on the same roads directly explains why the average delay per person increases over that time period as well. There must be offsetting mitigation improvements to reduce delay. As adding road capacity is deemed undesirable—something with which we agree, then the transit system should be expanded sufficiently to divert the growth in riders to transit. Lacking that emphasis, the regional plan is not a balanced plan.

The table of travel times by major corridors lacks comparable measures for a base year, making it difficult to ascertain how much difference each alternative actually makes. And the growth in travel times would be correlated to the average delay measures.

The table of Impervious Surfaces should reformatted for consistency with most other tables. It stands alone as listing the incremental change from the base year, whereas most other tables give actual measures for the base year and the year 2050. Alternatively, the wording in the title should be changed to more clearly emphasize this distinction.

The table addressing population in proximity to parks underestimates the impact of urban growth on the Rural Areas. The increasing urban population, coupled with a fixed amount of natural environment, implies a rather large impact of additional traffic, parking, and related services for all recreational/park sites in the Rural Areas. This should be discussed. For example, there are growing congestion and safety problems on Issaquah Hobart Road at the hang-glider field, due to an exploding number of hikers coming from urban areas to use the hang-glider trail up to Poo Poo Point. As a result, the parking area is often full and unavailable to the hang glider

community, in addition to the traffic issues. This is a fairly recent development, and thus a good example of a growth-driven problem.

## C — Modeling Methodology and Analysis Tools

<https://www.psrc.org/sites/default/files/v2050-dseis-appendixc-modelingmethodology.pdf>

The data and charts in Figures C.2-2 and -3 demonstrate that the regional plans for growth direction have failed to deliver on their promises. Less growth is happening in urban areas, and more growth is happening in rural areas, than plans provided for from 2000 to 2017. This is actually a long-standing pattern evident in trends since the 1970's when urban sprawl was first defined as a negative. Urban planners envision concentrated growth in the core areas of the region — and Rural Area residents would be quite happy for urban growth to follow those visions — but the development marketplace persists in a less concentrated direction, primarily to accommodate urban workers seeking lower cost housing at a distance from their jobs. Clearly, stronger mitigation requirements are needed to succeed in achieving the planners' vision. Those requirements, most likely, must be made as changes to State law, since local governments have shown, since 1990, that they are ill-equipped to actually manage growth properly.

The methodology description surrounding Table C.2-9 indicates PSRC made many technical assumptions to implement the outline of each alternative. For example:

*“To model the Stay the Course alternative, PSRC developed jurisdiction-level growth assumptions based on VISION 2040 regional geographies.”*

And after Figure C.2-4 it states:

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

These statements show that staff considered the total growth potential in each jurisdiction in each regional geography, and then *assumed* a certain distribution for each jurisdiction. While such assumptions are understandably necessary, there is no presentation of data to show the range of possible assumptions that might have been made, or by what means was the region-wide distribution of growth made to treat each jurisdiction consistently and fairly? Some information to explain this range of possibilities would be most helpful.

In section C.2-4 the text (see p. C-20) seems to acknowledge the weakness of these assumptions by stating:

*“The difference [in growth] can be pronounced for certain regional geographies.”*

In section C.2-5 the discussion of modeling in *UrbanSim* identifies a most disturbing assumption: the use of county-wide growth targets as a control (see p. C-23).

*“In this approach, growth targets serve as a proxy for shared understanding between local jurisdictions as to the relative role each plays in accommodating their respective county's future growth.”*

Unfortunately, this means that when a jurisdiction such as the City of Black Diamond intends to develop to a much, much higher level than the growth target assigned to it by the regional planning processes, that intention is not captured in the modeling process at all. Thus, even though the Reset Urban Growth alternative aims to reflect a continuation of actual development trends, it still does not take into account the actual intentions of Black Diamond. It still limits the Black Diamond jurisdictional forecast to the region's growth target, which is far, far less than Black



Diamond's plans. As a result, the impacts of Black Diamond's plans are *never* accounted for in any forecasting and analysis of traffic or other impacts on regional and local facilities.

We have witnessed in the past year alone that intensive analysis of traffic issues in and around the City of Issaquah on I-90, SR-18, and Issaquah-Hobart Road were described as using the latest regional forecasts. The authors of those studies appeared to be *unaware* that the regional forecasts they relied on failed to consider the largest impending source of new traffic in the study area. They were led astray precisely by this policy approach of relying on countywide totals and regionally endorsed distributions, when the City of Black Diamond shows no intention whatsoever to adhere to that distribution. As things now stand, the eventual result will be that the City of Issaquah is inundated by traffic increases to/from the south that seem to "*come from nowhere*" because the "*official*" regional forecasts fail to "*connect the dots*" properly. This is rapidly becoming the current case even before the massive Black Diamond developments are built and occupied!

## **D — Evaluation Criteria for Selecting a Preferred Growth Alternative**

[<https://www.psrc.org/sites/default/files/v2050-dseis-appendixd-evaluationcriteria.pdf>]

### **VISION 2050 Outcomes**

We support all thirteen (13) outcomes listed, especially the last one: "*Rural Areas. Rural communities and character are strengthened, enhanced, and sustained.*"

### **Evaluation Criteria**

#### **Development Patterns** (p. D-3)

We do not understand why one of the evaluation criteria includes: "*Growth in proximity to the urban growth boundary (population and employment within one-quarter mile of both sides of the urban growth boundary)*" This implies that it is desirable to develop on the rural side of the Urban Growth Boundary in violation of the State's Growth Management Act. We adamantly disagree with this premise.

## **F — List of Preparers**

<https://www.psrc.org/sites/default/files/v2050-dseis-appendixf-preparers.pdf>

We are surprised to see no Climate specialists on the Preparers' List.

## **G — Distribution List**

<https://www.psrc.org/sites/default/files/v2050-dseis-appendixg-distributionlist.pdf>

Thank you for including the GMVUAC on the Distribution List. In the future, please include all our organizations as listed on our Cover Letter herein.

## **H — Equity Analysis**

[<https://www.psrc.org/sites/default/files/v2050-dseis-appendixh-equityanalysis.pdf>]

Environmental Justice (see p. H-3) is described as: "*equal protection...regardless of race, ethnicity, or economic status. ... no population of people should be forced to shoulder a*

*disproportionate share of ... impacts...due to a lack of political or economic strength. ... Environmental justice promotes equal access to the decision-making process to have a healthy environment in which to live, learn, and work.”* The text lists over 22 specific populations that may be considered. We support these principles.

We believe these principles apply to Rural Area residents as well, because the fundamental criteria for justice apply to them as well. As described several times in our comments herein, the interests of Rural Area residents are so often systematically omitted from regional planning. Rural Area residents find themselves bearing adverse impacts of urban growth without recognition by the region that those impacts occur. Rural voices are little provided for in the governmental structures, and at the regional level, not at all. In King County alone, the rural population is nearly equivalent in size to that of the its second largest city—Bellevue. Yet, Rural Area residents are afforded less representation than most cities. Clearly, this is not just.