

VISION 2050 Draft Plan

Public Comment

September 16, 2019

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



VISION 2050 Draft Plan

To: Paul Inghram—PSRC, Director of Growth Management: pinghram@psrc.org

Subject: Comments—*VISION 2050* Draft Plan Plan

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

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

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

- (1) Effectively manage growth. Still a major problem and only will become more difficult, especially for those cities on the fringe of the Urban Growth Boundary, where growth is least needed and infrastructure is least able to service such growth.
- (2) Provide an efficient transportation system. Still a major problem that will become more difficult with insufficient tools available. Concurrency's many existing flaws only can be fixed at the State level. The "local" focus of Concurrency renders it nigh useless on a "regional" scale, yet major transportation issues only can be addressed using a regional lens. Further, not requiring "Highways of Statewide Significance" to be Concurrency Tested leaves a gaping hole in any traffic analysis to meet Level of Service standards.

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

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

Thank you.

Peter Rimbos primbos@comcast.net
Co-Coordinator, *VISION 2050*, GMVUAC

Mike Birdsall mike_birdsall@yahoo.com
Co-Coordinator, *VISION 2050*, GMVUAC

Bob Meeks
epca.wa@gmail.com
President, EPCA

Steve Hiester
info@gmvuac.org
Chair, GMVUAC

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

Michael Tanksley
wmtanksley@hollywoodhillassoc.org
President, HHA

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

cc: Josh Brown, PSRC Executive Director: jbrown@psrc.org

King County Council: council@kingcounty.gov

John Taylor, Director, King County Dept. of Local Services: john.taylor@kingcounty.gov

Ivan Miller, Comprehensive Planning Manager, King County: ivan.miller@kingcounty.gov

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Introduction and Overview **Draft VISION 2050: Introduction and Overview**

(pp. 1-9)

Toward a Sustainable Future

(pp. 2-7)

VISION 2050 Overview

p. 6:

Keep the region moving

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

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

p. 7:

Act collaboratively and support local efforts

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

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

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User Guide

(pp. 8-9)

p. 8:

Multicounty Planning Policies

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

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

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Multicounty Planning Policies

Draft VISION 2050: Multicounty Planning Policies

(pp. 11-131)

A Common Planning Framework

p. 11:

The Growth Management Act and Multicounty Planning Policies

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

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

Regional Planning Project Guidance

p. 11:

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

VISION 2050 Policy Structure

p. 12:

Policies

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

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

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Regional Collaboration MPP: Regional Collaboration (pp. 15-21)

Countywide Coordination

p. 17:

Funding Priorities and Fiscal Challenges

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

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

Regional Collaboration Policies (MPP-RC’s)

pp. 18-19:

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

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

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

We consider the three above listed *Regional Collaboration Policies* (of a total of twelve—all of which are pertinent and needed) as critical to ensuring the integrity of the *VISION 2050* Plan and of the Rural Area as the four-county region grows. We support the above policies, which are both strong and necessary, as they: support regional growth and manufacturing/industrial centers; direct funding to countywide and high-capacity transit centers; and provide priority to transportation infrastructure to advance regional growth center housing.

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Regional Growth Strategy MPP: Regional Growth Strategy (pp. 23-46)

p. 23:

Goal: *“The region accommodates growth in urban areas, focused in designated centers and near transit stations, to create healthy, equitable, vibrant communities well-served by infrastructure and services. Rural and resource lands continue to be vital parts of the region that retain important cultural, economic, and rural lifestyle opportunities over the long term.”*

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

p. 23:

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

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

A Framework for Growth

pp .23-24:

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

“The region’s varied rural areas offer a diverse set of natural amenities. Common features include small-scale farms, wooded areas, lakes and streams, and open spaces. Technically, rural lands are those areas that are not designated for urban growth, agriculture, forest, or mineral resources. Rural development can consist of a variety of uses and residential patterns

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that preserve rural character. The strategy encourages lower rates of growth in rural areas and in outlying communities to preserve rural landscapes and reduce long car trips.”

The “framework” detailed above is strong and best serves the *Regional Growth Strategy* detailed elsewhere. The description of the “rural areas” is clear and focused on the key aspects of rural character, which we continually strive to preserve in spite of a variety of external development pressures.

Focusing Growth Near Transit and in Centers

pp. 25-26:

Regional Centers

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

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

The Regional Growth Strategy by the Numbers

p. 34:

Cities and Towns

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

Cities inside the contiguous urban growth area will likely receive a larger share of growth due to their proximity to the region’s large cities, existing and planned transportation systems,

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and other supporting infrastructure. Small residential towns have limited potential for accommodating growth and are likely to receive a lesser share of cities and towns growth.

Free-standing cities and towns are separated from the contiguous urban growth area and should serve as hubs for relatively higher-density housing choices and as job and service centers for surrounding rural areas. These cities should be the focal points of rural-based industries and commerce and the location of schools and other institutions serving rural populations. Due to their physical isolation from the rest of the designated urban growth area, they will likely receive a lesser overall share of growth and are not expected to grow as much as cities and towns in the contiguous urban growth area.

The Regional Growth Strategy calls for 42 Cities and Towns to accommodate 6% of the region's population growth and 4% of its employment growth by the year 2050."

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

p. 37:

Rural Areas and Natural Resource Lands

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

Rural Areas

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

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

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Guidance for Aligning Growth Targets

p. 43:

“Counties and cities work together to establish growth targets for each jurisdiction to accommodate projected growth. These targets set by countywide planning bodies support implementation of the Regional Growth Strategy and VISION 2050 objectives of housing production, better jobs-housing balance, and greater growth near the region’s transit investments. Counties and their cities will define new countywide growth targets prior to the next cycle of local comprehensive plan updates. This section addresses principles to guide regional review of countywide growth target allocations and comprehensive plan certification.

.....

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

.....

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

.....”

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

p. 43:

Regional Growth Strategy Adjustments to Support Targets

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

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

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

Regional Growth Strategy Policies (MPP-RGS's)

pp. 44-45:

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

.....

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

.....

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

.....

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

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

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

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

- Implementing the *"Regional Growth Strategy through regional policies and programs, countywide planning policies and growth targets, and local plans."* Such a followthrough down to local plans is imperative.
- Ensuring *"development in rural areas is consistent with the regional vision."* This must be incumbent on each government.
- Attracting *"65% of the region's residential and 75% of the region's employment growth to high- capacity transit station areas."* We expect this to be both the most difficult strategy to which to adhere and the most important to achieve.

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

Regional Growth Strategy Actions (RGS-Actions)

p. 45:

Regional Actions

.....

RGS-Action-3 — “**Growth Targets:** PSRC, together with its member jurisdictions, will provide guidance and participate with countywide processes that set or modify local housing and employment targets. PSRC will also provide guidance on growth targets for designated regional centers and improving jobs-housing balance, and coordinate with member jurisdictions regarding buildable lands reporting.”

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

p. 46:

Local Action

RGS-Action-4 — “**Regional Growth Strategy:** As counties and cities update their comprehensive plans in 2023/24 to accommodate growth targets and implement the *Regional Growth Strategy*, support a full range of strategies, including zoning and development standards, incentives, infrastructure investments, housing tools, and economic development, to achieve a development pattern that aligns with *VISION 2050.*”

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

- Where will such “*incentives*” come from?
- Will available “*infrastructure investments*” be enabling or destabilizing?
- What “*housing tools*” will be most accommodating and prudent to employ?
- How best can “*economic development*” be directed, if any all?

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Environment **MPP: Environment** (pp. 49-57)

p. 49:

Goal: *“The region cares for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, and reducing air pollutants. The health of all residents and the economy is connected to the health of the environment. Planning at all levels considers the impacts of land use, development, and transportation on the ecosystem.”*

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

Habitat, Open Space, and Environmental Stewardship

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

Environment Policies (MPP-En’s)

p. 55:

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

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

p. 56:

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

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

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

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

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

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

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

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

Environment Actions (En-Actions)

p. 57:

Regional Actions

En-Action-2 — *“Watershed Planning Support: PSRC and the Puget Sound Partnership will coordinate to support watershed planning to inform land use, transportation, and stormwater planning and projects that improve the health of Puget Sound.”*

En-Action-3 — *“Watershed Planning: Counties and cities, together with other jurisdictions in the watershed, will participate in watershed planning to integrate land use, transportation, stormwater, and related disciplines across the watershed to improve the health of Puget Sound.”*

We support both **Regional Actions** above, but suggest expanding each of their scopes to include other important bodies of water beyond only Puget Sound itself. Rivers and streams, part of critical watersheds, feed Puget Sound and are inextricably linked to its long-term health.

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p. 57:

Local Action

En-Action-4 — *“Local Open Space Planning: Counties and cities will work to address open space conservation and access needs as identified in the Regional Open Space Conservation Plan in the next periodic update to comprehensive plans.”*

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

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

p. 59:

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

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

p. 59:

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

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

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

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

State, Regional, and Local Activities

p. 61:

Four-Part Greenhouse Gas Strategy

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

We support the *Four-Part Greenhouse Gas Strategy* in our comments below on its elements.

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p. 63:

Land Use

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

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

p. 63:

User Fees

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

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

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

p. 63:

Transportation Choices

“Significant investments have been made over the last decade to provide multimodal transportation improvements, including new trails, bus rapid transit and light rail services, and high occupancy vehicle lanes. The Regional Transportation Plan includes a coordinated network of regional and local transit investments, resulting in significant improvements in frequent transit service throughout the region.”

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Such improvements in transit service are necessary, but clearly not sufficient if busses are crawling or, worse, idling in the same traffic as everyone else. Consequently, there will need to be more bus-only lanes to allow quick movement between stops. Otherwise transit use will suffer and congestion will continue to build throughout the region. Further, a *regional* perspective must be ensured whereby intercity needs and uses are addressed and accommodated by accurately describing impacts to all elements of the transportation network regardless of jurisdiction.

p. 64:

“Other strategies to address climate change, outside the scope of the region’s Four-Part Greenhouse Gas Strategy, include sequestering and storing greenhouse gases through additional actions to protect and restore carbon sinks such as forests, soils, wetlands, estuaries, and urban trees.”

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

Climate Change Policies (MPP-CC’s)

p. 65:

MPP-CC-4 — *“Protect and restore natural resources that sequester and store carbon such as forests, farmland, wetlands, estuaries, and urban tree canopy.”*

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

Climate Change Actions (CC-Actions)

p. 66:

Local Action

CC-Action-3 — *“Cities and counties will incorporate emission reduction policies and activities in their comprehensive planning. Elements include supporting the adopted Regional Growth Strategy, providing multimodal transportation choices, and encouraging a transition to a cleaner transportation system.”*

We support this Local Action, but have a concern about followup. We assume PSRC, in its review and certification of Comprehensive Plans, will assess how each jurisdiction incorporates such policies and actions in its plan and how they support *VISION 2050* goals in this area.

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Development Patterns MPP: Development Patterns (pp. 69-89)

p. 69:

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

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

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

p. 69:

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

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

Centers: Supporting Connections to Opportunities

p. 74:

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

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

p. 74:

Regional Centers

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

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

p. 74:

Countywide Centers, Local Centers, and Transit Station Areas

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

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

p. 76:

Figure 24 – Types of Centers and Transit Station Areas

“Countywide Growth Center: Designated through the countywide process to serve as compact, mixed-use development within a city or unincorporated urban area....”

“Countywide Industrial Center: Designated through the countywide process to serve as important local industry areas within a city or unincorporated urban area....”

We question how such “Growth” and “Industrial” Centers would be viable in unincorporated urban areas that often lack an adequate tax base to support the necessary infrastructure, thus possibly setting up a “*chicken or the egg*” causality scenario. Consequently, it is not clear how either

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“Growth” and “Industrial” Centers would be suitable for cities on the urban fringe or unincorporated urban areas, neither of which are “central places for activities and services and places where future growth can occur” (from the last paragraph on p. 74).

Annexation and Incorporation

p. 79:

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

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

Conserving Traditional Landscapes: Rural Areas and Natural Resource Lands

p. 80:

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

“Washington state law enables development to occur based on regulations in effect at the time that a building permit or land division application was submitted – a practice known as vesting. This can lead to situations where development approved before adoption of

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comprehensive plans under the Growth Management Act is not consistent with the law's planning goals or more recently adopted local plans. VISION 2050 advances tools and techniques to address the challenges of vesting in rural areas, such as conservation programs, purchase of development rights, transfer of development rights, and lot consolidation."

We agree that a *balanced* approach on vesting is necessary to conserve our Rural Area and Natural Resource Lands. Clearly, existing tools, such as Conservation easements, Transfer of Development Rights (TDRs), Stewardship programs, etc., must be maintained and enhanced. The use of targeted tax incentives could prove useful.

Supporting Growth Through Concurrency

p. 82:

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

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

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

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

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

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

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

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

We see several potential solution paths for discussion:

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

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

RCW 36.70A--GROWTH MANAGEMENT--PLANNING BY SELECTED COUNTIES & CITIES.

36.70A.020--Planning Goals [see 12. Public facilities and services].

36.70A.070--Comprehensive Plans--Mandatory Elements [see (6) transportation element].

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

Development Pattern Policies (MPP-DP’s)

pp. 82-87:

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

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

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

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

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

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

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

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

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

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

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

MPP-DP-41 — *“Support the sustainability of designated resource lands. Do not convert these lands to other uses.”*

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

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

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

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

- *“Cross-jurisdictional boundaries”* are not a roadblock, but rather an opportunity to ensure our transportation infrastructure is continuous and multipurpose.
- While promoting *“transit service to and from existing cities in Rural Areas”* is important, it also must be recognized that cities on the urban fringe also must receive increased transit service to lower the incredible burden they place on County road networks.
- Although avoiding *“new fully contained communities outside of the designated urban growth area”* is prudent, it must be recognized that cities on the urban fringe, which approve such massive master-planned developments, cause very *similar* problems, especially on fragile and continually underfunded County road networks.

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

Development Pattern Actions (DP-Actions)

p. 88:

Regional Actions

DP-Action-5 — “**Concurrency Best Practices:** PSRC will continue to develop guidance on innovative approaches to multimodal level-of-service standards and regional and local implementation strategies for local multimodal concurrency. PSRC, in coordination with member jurisdictions, will identify approaches in which local concurrency programs fully address growth targets, service needs, and level-of-service standards for state highways. PSRC will communicate to the Legislature the need for state highways to be addressed in local concurrency programs.”

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

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

p. 91:

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

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

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

Jobs-Housing Balance

p. 96:

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

This is an extremely important planning concept, but one where the followthrough has proven to be difficult. Cities plan for both housing and commercial growth, but often attract the former, while the latter lags behind or, worse, never materializes at a level that provides the city an adequate tax base to provide needed services and infrastructure for both residents and businesses. This especially is prevalent for cities along the edge of the Urban Growth Boundary (i.e., the “*urban fringe*”), which quite often businesses have tended to avoid (due to lower population densities, longer supply lines, etc.) or attract primarily retail businesses that often provide only low-paying jobs further adversely impact the tax base. As a result, such cities exhibit a great imbalance, i.e., being housing rich and employment poor. This then results in even more commuters traveling even longer distances. Consequently, we agree policies need to encourage housing in *job-rich* locations and not hope for jobs to materialize in *housing-rich* locations, which often appears to be what some cities continue to do.

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Housing Actions (H-Actions)

p. 98:

Regional Actions

H-Action-2 — *“Regional Housing Assistance: PSRC, ... , will assist implementation of regional housing policy and local jurisdiction and agency work. Assistance shall include the following components:*

- *Guidance for developing local housing targets (including affordable housing targets), model housing policies, and best housing practices*

.....”

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

p. 98:

Local Actions

H-Action-4 — *“Local Housing Needs: Counties and cities will conduct a housing needs analysis and evaluate the effectiveness of local housing policies and strategies to achieve housing targets and affordability goals to support updates to local comprehensive plans. Analysis of housing opportunities with access to jobs and transportation options will aid review of total household costs.”*

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

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Economy **MPP: Economy** (pp. 101-108)

p. 101:

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

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

Thriving Communities for People and Businesses

p. 104:

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

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

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

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

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

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Economy Policies (MPP-EC's)

p. 107:

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

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

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

p. 107:

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

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

Economy Actions (EC-Actions)

p. 107:

Regional Actions

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

We provided comments on the draft *Regional Economic Strategy* in early 2018 and generally support its goals and strategies. However, we recommend that Rural Area unincorporated area councils/associations like ours be afforded the opportunities to join PSRC Boards, such as the *Economic Development District Board*, and not simply rely on *“representation”* through County *“proxies.”*

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p. 108:

Local Action

EC-Action-4 — *“Economic Development Elements: Cities and counties will update (or adopt) their economic development element – tailored to meet the jurisdiction's unique needs and leveraging public investments – as specified in the Growth Management Act, when conducting the expected 2023/24 comprehensive plan update.”*

We will continue to monitor the *Economic Development Elements* of jurisdictional comprehensive plans. We will continue to review and comment on King County's Comprehensive Plan updates. During our reviews we will continue to ensure State law is met, especially **RCW 36.70A.011** (our emphases):

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

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Transportation MPP: Transportation (pp. 111-122)

p. 111:

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

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

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

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

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

p. 111:

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

Unfortunately, “high-capacity transit” includes busses, which often do not have dedicated transit lanes on which to travel and, thus, are stuck in the same congestion as everyone else. Consequently, without a vast expansion of transit-only lane-miles, these goals will not be achieved.

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p. 112:

“As the region’s designated Metropolitan Planning Organization and state Regional Transportation Planning Organization, PSRC is responsible for developing and maintaining a long-range multimodal transportation plan that provides a regional perspective for transportation that coordinates across jurisdictions and recognizes the critical link between transportation, land use planning, economic development, and the environment.”

The planning, coordination, and data collection/development/assessment roles PSRC plays in the region are critical to helping us meet our goals, but PSRC also is quite limited when it comes to execution of such plans.

The Regional Transportation Plan

p. 112:

“Under the Growth Management Act, the state, local jurisdictions, and other transportation agencies are responsible for implementing transportation investments. They do so through projects that maintain, improve, and create new roadways, transit service, and pedestrian, bicycle, and freight infrastructure. Working together to consider mobility and access needs both within and beyond the borders of individual jurisdictions is critical to building the efficient, multimodal system described in the Regional Transportation Plan.”

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

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

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

We see several *potential solution paths* to be explored:

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

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

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

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

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

p.113:

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

Will this process identify the full set of transportation improvements needed to achieve a better mobility outcome than the current state of regional multi-area congestion? We recommend setting *regional* Level of Service standards in such a way as to lead to reducing of average travel times regionwide from current levels to something comparable to 1990 levels, or other similar goal.

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p. 114:

"Figure 31 — Regional Transportation System Map."

Unfortunately, Figure 31 does not show any Bus Rapid Transit to the cities of Covington, Maple Valley, Black Diamond, and Enumclaw, in spite of serious congestion on the highways connecting those cities to the metropolitan core areas. The 2022 update to the *Regional Transportation Plan* should correct that omission in the commuter corridors to/from these cities. The commute trip length for residents of these cities is longer than average and any diversion of commuters into transit and ride-sharing modes for these areas will have above-average benefits toward reducing chronic congestion and striving towards the goal of reducing greenhouse gas emissions.

Supporting People

p. 115:

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

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

A Sustainable Transportation System

p. 117:

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

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

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

Transportation Policies (MPP-T's)

pp. 118-121:

MPP-T-3 — *“Reduce the need for new capital improvements through investments in operations, pricing programs, demand management strategies, and system management activities that improve the efficiency of the current system.”*

MPP-T-6 — *“Pursue alternative transportation financing methods, such as user fees, tolls, and other pricing mechanisms to manage and fund the maintenance, improvement, preservation, and operation of the transportation system.”*

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

MPP-T23 — *“Avoid construction of major roads and capacity expansion on existing roads in rural and resource areas. Where increased roadway capacity is warranted to support safe and efficient travel through rural areas, appropriate rural development regulations and strong commitments to access management should be in place prior to authorizing such capacity expansion in order to prevent unplanned growth in rural areas.”*

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

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

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

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

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

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

Transportation Actions (T-Actions)

pp. 121-122:

Regional Actions

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

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

p. 122:

Local Action

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

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

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Public Services

MPP: Public Services

(pp. 125-131)

p. 125:

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

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

p. 126:

Special Purpose Districts

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

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

Capital Facility Siting

p. 127:

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

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

p. 127:

School Siting

“School district boundaries have been long established, and some districts that were historically rural have become major suburban education providers. As a result,

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there are some districts that provide school services to both urban and rural populations, and some that own sites outside the urban growth area intended for future schools. Developing urban-serving schools on these outlying locations often requires expensive programs to transport students and encourages students to drive or be driven to schools.

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

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

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

Public Services Policies (MPP-PS’s)

pp. 128-131:

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

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

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

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

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

We consider the five above listed Public Services policies (of a total of twenty-nine—all of which are pertinent and needed) as critical, as the region grows, to ensure the integrity of the Rural Area, as we have enumerated herein.

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Public Services Actions (PS-Actions)

pp. 128-131:

Public Services Actions (PS-Actions)

Regional Actions

PS-Action-2 — *“Facilities Siting and Design: PSRC will facilitate cooperative efforts with special service districts and local jurisdictions to site and design facilities that enhance local communities in accordance with growth management goals and VISION 2050.”*

We support proper siting of Public Services facilities such that urban and urban-serving facilities be sited *within* the Urban Growth Area, which we believe is in accordance with the goals in *VISION 2050*.

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Implementation Draft VISION 2050: Implementation

(pp. 133-138)

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

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

Policy and Plan Review

p. 134:

Countywide Planning Policies

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

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

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

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

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p. 135:

Local Comprehensive Plans

“Every county, city, and town in the region maintains a comprehensive plan to shape the future of their community. PSRC works with local governments and agencies to ensure that planning is coordinated and meets regional and state requirements consistent with PSRC’s adopted Policy and Plan Review Process. PSRC reviews and certifies the transportation-related provisions of local comprehensive plans based on three things:

- 1. Established regional guidelines and principles*
- 2. The adopted long-range Regional Transportation Plan*
- 3. Transportation planning requirements in the Growth Management Act*

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

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

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

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

Regional Transportation Planning and Project Funding

p. 136:

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

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

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

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

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

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

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

Regional Economic Development Planning

p. 137:

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

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

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1. *Preserve rural lands and rural character to keep the Rural Area Rural* by ensuring urban and urban-serving facilities remain in urban areas;
2. *Sustain and help grow our local rural economies by protecting farmlands, forests, and open space*, while encouraging recreational use in rural areas that is compatible with environmental interests and local culture;
3. *Find equitable mechanisms to maintain rural transportation infrastructure* that is increasingly used by urban commuters to travel to other urban areas; and
4. *Ensure the availability of inexpensive broadband access within rural areas* to facilitate telecommuting, distance learning, and small businesses that depend upon high-speed internet access.

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VISION 2050 Legal Framework (pp. 139-140)

Growth Management Act

p. 139:

“Washington’s Growth Management Act provides the framework for planning at all levels in the state, including identifying and protecting critical environmental areas, developing multicounty and countywide planning policies, and crafting local comprehensive plans (RCW 36.70A). Multicounty planning policies (and the related countywide planning policies) provide a common framework for local and regional planning in the central Puget Sound region. At a minimum, multicounty planning policies are to address the urban growth area, contiguous and orderly development, siting capital facilities, transportation, housing, joint planning, and economic development. The multicounty planning policies are included in VISION 2050.

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

PSRC’s certification of transportation-related provisions in local comprehensive plans includes determining conformity with state requirements for transportation planning in local plans, consistency with adopted regional guidelines and principles, and consistency with the Regional Transportation Plan (RCW 36.70A.070 and 47.80.026). The legislation also addresses the certification of the countywide planning policies. Certification of plans is a requirement for jurisdictions and agencies that intend to apply for PSRC funding or proceed with projects submitted into the Regional Transportation Improvement Program.”

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