

September 3, 2019

Sent via email to:
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Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

RE: Draft VISION 2050

Greetings:

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

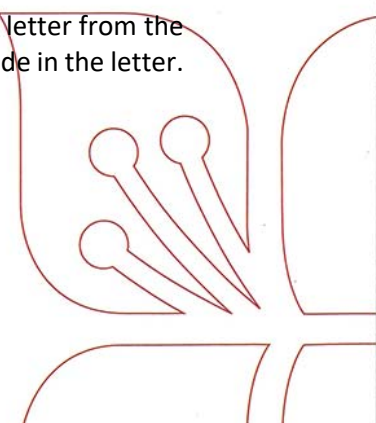
The Plan begins with a bold vision statement to reduce our contributions to climate change, develop distinct and unique communities throughout the region with a diversity of people who have economic opportunities in a region that competes globally and sustains a high quality of life by 2050.

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

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

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

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



Regional Collaboration

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

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

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

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

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

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

Regional Growth Strategy

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

The City is supportive of implementing the Transit Focused Growth alternative, which directs most of the growth near existing and planned high-capacity transit and to Regional Growth Centers. The City is

working with Pierce Transit to provide a hybrid bus rapid transit service to the University Place Regional Growth Center.

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

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

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

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

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

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

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

and

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

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

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

PSRC’s guidance for setting growth targets should recognize that unique sub-regional realities exist, e.g., geographical and environmental constraints, transportation access, external growth pressures such as a military installation; local growth trends differ from one jurisdiction and/or sub-region to another; and

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

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

Please consider amending MPP-RGS-3 as follows:

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

Environment

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

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

Climate Change

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

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

Development Patterns

The Development Patterns chapter builds on and supports the Regional Growth Strategy, recognizing places where growth has traditionally occurred, and taking advantage of existing infrastructure, public

facilities and services. The MPP in this chapter embrace the principles of smart growth, directing growth to high-quality, compact urban communities with a mix of uses, housing types and with multi-modal transportation opportunities, as well as to protect rural lands from urban sprawl.

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

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

Housing

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

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

The Plan states:

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

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

Regarding displacement the Plan states:

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

The City welcomes the technical assistance PSRC is willing to provide; however, the City does not have the capacity to produce affordable housing. The City does have regulatory control and has made significant changes increasing density and height, promoting compact mixed-use developments near transit and providing density incentives to produce affordable housing.

However, the City does not welcome the oversight of the contents and implementation of its housing element as required under H-Action-4 which states:

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

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

Economy

The Plan states:

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

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

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

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

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

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

Economic Development Elements: Cities and counties will update (or adopt) their economic development element – tailored to meet the jurisdiction's unique needs and leveraging public investments – as specified in the Growth Management Act, when conducting the

expected 2023/24 Comprehensive Plan update, [provided that funding is made available by the State Legislature as provided in RCW 36.70A.070\(9\).](#)

Transportation

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

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

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

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

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

Public Services

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

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

Implementation

Under Policy and Plan Review the Plan states:

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

“The multicounty planning policies in VISION 2050 serve as the region's **guidelines and principles.**”

“Certification of plans is a requirement for jurisdictions and agencies that intend to apply for PSRC funding or proceed with projects submitted into the Regional Transportation Improvement Program.”

and

“PSRC reviews and certifies the **transportation-related provisions** of local comprehensive plans based on three things:

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

As stated in the beginning of this letter, we support PSRC’s role in providing guidance to ensure consistency in Comprehensive Plans throughout the region. In this chapter, the Plan clearly states providing guidance is the purpose of and responsibility of PSRC. More specifically, PSRC’s role is to review and certify transportation-related provisions of local comprehensive plans.

During the last update and certification process, we understand there was a lot of consternation regarding the level of oversight PSRC took on as opposed to providing guidance. Recognizing this, PSRC produced the Taking Stock Report with the help of area stakeholders.

We trust PSRC will use the Taking Stock Report to improve their plan review process during future comprehensive plan updates and limit their review to transportation-related provisions, as was the case prior to this latest cycle of plan certifications.

Thank you for the opportunity to comment on the Draft VISION 2050 Plan. We look forward to seeing the final plan adopted and implemented as a guidance document.

Puget Sound Regional Council

September 3, 2019

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Sincerely,

Kent Keel

Mayor

Copy: City Council
City Clerk