



CITY OF KIRKLAND
Planning and Building Department
123 5th Avenue, Kirkland, WA 98033
425.587.3600- www.kirklandwa.gov

MEMORANDUM

To: Kurt Triplett, City Manager

From: Adam Weinstein, Director of Planning and Building

Date: April 9, 2019

Subject: Comment letter on Draft Supplemental Environmental Impact Statement (SEIS) on Vision 2050

On March 5, 2019, the City Council asked staff to prepare a comment letter on the Draft SEIS prepared for Vision 2050. Vision 2050 is the Central Puget Sound Region's long-range plan for growth. Attachment 1 is the draft comment letter, which could be signed by City Council. Comments on the Draft SEIS are due by April 29.

Attachment 2 is a Draft SEIS comment letter prepared by County Executive Dow Constantine following the March 27 meeting of the Growth Management Planning Council. Local jurisdictions are invited to sign-on to this letter, and the County Executive welcomes suggested revisions to the letter prior to April 19, as long as the overall direction of the letter remains intact. Elected officials interested in signing-on to the letter must provide signature blocs to King County by noon on April 29.

Once Council has reviewed the letters and suggested any edits, staff recommends that the Council should approve a motion authorizing the Mayor to sign one or both letters.

Attachments:

1. Draft comment letter from City of Kirkland on Vision 2050 SEIS
2. Draft comment letter from County Executive Dow Constantine on Vision 2050 SEIS

April 9, 2019

Attn: VISION 2050 SEIS Comment
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

Dear Puget Sound Regional Council,

This letter comprises the City of Kirkland's formal comments on the Draft Supplemental Environmental Impact Statement (SEIS) for Vision 2050.

We commend PSRC on identifying and evaluating three meaningful growth alternatives for the region, all of which would substantially increase transit ridership, reduce per capita vehicle miles traveled, and reduce greenhouse gas emissions. At this time of robust economic growth, and increased concern about regional traffic, housing affordability, and environmental protection, it is time to reinforce and pursue growth strategies that focuses on infill development primarily within urban growth centers, and protection of resource lands. Therefore, we are pleased that all the evaluated alternatives conform to Vision 2040's underlying principle: growth focused into metro and core cities. Adherence to this principle will ensure that the quality of life and environment in the region is protected, paving the way for continued economic success.

While the City of Kirkland is pleased with the overall analysis in the SEIS, we offer the following big-picture comments:

- *Equity/Displacement Analysis.* The equity/displacement analysis seems to overlay job growth and demographic characteristics (e.g., communities of color, low-income communities) to yield equity/displacement impacts. In a dynamic economy, this may be an oversimplified approach to evaluating a complex and important issue, and could suggest that policymakers limit job growth in lower-income areas, when job growth might actually be beneficial to such populations. We agree with the focus on expanding housing affordability in these areas, but would also suggest that a more nuanced displacement analysis be undertaken that accounts for some of the social benefits of economic growth in areas that have historically been bypassed by economic development.
- *Utilities/Infrastructure.* The SEIS notes that the Transit Focused Growth alternative could reduce the need for new infrastructure compared to the Stay the Course alternative. On its surface, this conclusion is logical, although experience suggests that upsizing infrastructure to accommodate infill growth in urbanized areas may be significantly more resource-intensive and expensive than extending infrastructure to greenfield areas. This means that it may be harder for local governments/agencies to build the infrastructure that may be needed to accommodate increased growth in already-urbanized areas. The SEIS should explore what additional public or private support might be needed to allow for infrastructure development under the Transit Focused Growth Alternative.
- *Affordable Housing.* Since housing affordability is critical to achieving any of the growth strategies, and housing affordability continues to be heavily influenced by local decisions, how would declining affordability affect achievement of any of the growth alternatives? Beyond the laundry list of housing streamlining and affordability measures on page 105 of the SEIS, what

are the housing affordability assumptions underlying the feasibility of each alternative, and what is expected of local governments in terms of promoting housing affordability and diversifying a housing stock that on a regional scale, at least, primarily comprises single-family units?

After having reviewed the SEIS, the City of Kirkland is most strongly in favor of the Transit Focused Growth Alternative (75% of the region's growth occurring near high-capacity transit), which is most in alignment with the City's growth strategy. Under this alternative, 57% of growth would be in higher-density settings (compared with 46% for the Stay the Course alternative and 44% for the Reset Urban Growth alternative). The transit alternative also takes less land, would boost transit ridership the most, and would have the most beneficial effects on reducing daily per capita drive time and related reductions in carbon emissions.

One last point: Kirkland is pursuing designation of Downtown Kirkland as an Urban Growth Center in 2019. Based on discussions with PSRC, that designation would not impact Vision 2050, since the City already has an existing Urban Growth Center. However, we would appreciate a reference to the planned designation in the SEIS and Vision 2050. In addition, we believe that Downtown Kirkland already surpasses the minimum activity unit threshold to qualify for an Urban Growth Center, with appropriate planning policies in place, meaning that Downtown Kirkland is well-positioned for additional growth and transportation investments.

For more information, please contact Adam Weinstein, Director of Planning and Building, at 425-827-3227 or aweinstein@kirklandwa.gov.

Sincerely,

Kirkland City Council

Penny Sweet, Mayor

Copy: Kirkland City Council, Planning Commission

April 29, 2019

ATTN: VISION 2050 Draft SEIS Comment
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Dear Puget Sound Regional Council:

King County and the cities in in the county have been successfully implementing VISION 2040 by focusing the majority of growth into the cities and the Urban Growth Area (UGA), creating vibrant urban centers, protecting natural resource lands and rural areas, and focusing public investments to support efficient use of the land. The Central Puget Sound Region needs to continue to efficiently use its land and wisely focus its investment of public funds as we look to the future.

King County intends to stay on this pathway of creating a sustainable future for our residents. VISION 2050 should reinforce this successful foundation and focus on those issues that were not fully addressed in VISION 2040 to carry the region into the future.

VISION 2040 was approved in May, 2008 – before both Sound Transit 2 and Sound Transit 3 were approved resulting in a 116 mile regional light rail system upon completion. Additionally over the last several years the local transit agencies in the region have adopted long range plans which would implement VISION 2040. The preferred alternative for VISION 2050 must recognize the land use opportunities presented by the future regional transportation system that will be more transit-oriented than in 2008 while creating more opportunity for all of our current and future residents.

The growth pattern should maintain integrity of the Urban Growth Area

The continued success of planning in accordance with the Growth Management Act centers on directing growth to the existing UGA. This allows for the development of vibrant urban centers and an efficient transportation system while allowing for sustainable rural areas and protection of our natural resource lands. The Transit Focused Growth alternative performs best at keeping growth within the UGA.

- Transit Focused Growth directs 98% of growth to the UGA while Stay Course is at 95% and Reset Urban Growth at 94%.
- Transit Focused Growth results in 6% of growth within a ¼ mile of the UGA boundary while Stay the Course is at 9% and Reset Urban Growth at 10%.

The growth pattern should prioritize cities and centers for accommodating growth

Directing growth to our cities and centers presents the greatest opportunity for the largest number of residents while allowing the region to efficiently use public infrastructure. The Transit Focused Growth alternative performs the best at directing growth to the largest cities and centers.

- Metro and Core cities receive the most population growth in the Transit Focused Growth alternative.
- The Reset Urban Growth alternative directs growth away from the Metro and Core cities, although less so in King County since our growth pattern is more established.

The growth pattern should build on the opportunities and investment of the expanded transit network

The new growth pattern must acknowledge how the expansion of the transit network, both Sound Transit expansion and local transit systems, will guide us into the future. The Transit Focused Growth alternative, by definition, directs the most growth to locations within proximity to high capacity transit.

- The Transit Focused Growth alternative shows the greatest increase in transit trips with 84% of King County growth locating in proximity to transit.
- The Reset Urban Growth alternative locates only 61% of King County's growth in proximity to transit, which is even less than Stay the Course at 64%.

The growth pattern should advance racial and social equity as a cornerstone of the plan

Due to historic patterns of disinvestment and undervaluation, communities that are majority low income and Native American/Alaska Native, people of color, immigrants and refugees, and speak limited English will face substantial and disproportionate displacement pressure in all of the alternatives as the region continues to grow. Consequently and urgently, community-driven, place-based displacement and gentrification risk strategies must be included in VISION 2050. VISION 2050 must set minimum expectations for all jurisdictions within the region to implement these strategies to reduce the disproportionate burden on these communities and ensure equitable growth in our region, prioritizing quality of life improvements for communities most in need.

The Transit Focused Growth alternative locates the most housing and jobs within proximity to high capacity transit, which will create the greatest opportunity for all residents along with the right strategies and implementation measures. This option is the best pathway for equitable growth as long as the region plans for housing affordability and an inclusive economy. VISION 2050 should mitigate against increased

displacement pressure by pursuing regional strategies and compelling local actions that preserve and add to the region's affordable housing stock and create family-wage jobs in areas proximate to transit.

The growth pattern should allow for a variety of housing types while addressing housing affordability for all residents, especially for those in the lowest income categories

High and middle density developments create a greater opportunity for housing affordability as the region grows. Locating more housing in proximity to transit creates opportunity by allowing households to forgo a car, which decreases their monthly expenses. The Transit Focused Growth alternative has the highest concentrations of growth in proximity to high capacity transit.

- Transit Focused Growth has the greatest share of high density growth in King County at 83% compared to 67% for the Reset urban Growth.

While high density growth is important for achieving our environmental and growth management goals, VISION 2050 should provide mitigation with strategies that also encourage middle density housing development, which could add to the region's affordability.

The growth pattern should avoid environmental impacts and reduce greenhouse gas emissions

The greenhouse gas emissions are projected to decrease with all alternatives due to the wider use of cleaner fuels. But, in order to ensure that the region reduces its greenhouse gas emissions, we need to incorporate reduction goals into VISION 2050, prioritizing eliminating the disproportionate burden of environmental impacts to low income and Native American/Alaska Native, people of color, immigrants and refugees, and those who speak limited English. The King County Climate Change Collaborative (K4C) has countywide greenhouse reduction goals and the Puget Sound Clean Air Agency has region-wide reduction goals. These already established goals should serve as a basis for greenhouse gas reduction goals in VISION 2050. VISION 2050 should recognize the disproportionate burden of environmental impacts that low income communities and communities of color in the region currently bear and include strategies to reduce this burden and mitigate against future environmental health impacts.

- While Greenhouse Gas Emissions as CO₂ decrease in all alternatives from the base year, the Transit Focused Growth alternative sees the greatest reduction at 16%.

- In terms of impervious surface, the Transit Focused Growth alternative develops the least amount of land while Reset Urban Growth creates the highest amount of impervious surface.
- Regarding the region's ecosystems, the Transit Focused Growth alternative poses the least risk of adverse effects to the ecosystems compared to the alternatives that spread more growth into rural and urban unincorporated areas.

The analysis presented in the Draft State Environmental Impact Statement points to the Transit Focused Growth alternative as the best path forward based on the desired outcomes of the regional growth pattern.

Thank you for your consideration.

Sincerely,

Dow Constantine
King County Executive

DRAFT