

July 31, 2006

Norman Abbott, Director of Growth Management Planning
and SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-035

Dear Mr. Abbott:

Thank you for the opportunity to provide comments on the Puget Sound Regional Council Vision 2020 Update Draft Environmental Impact Statement (DEIS.) This is clearly a unique opportunity to shape the future of our region that will leave a legacy for generations to come. To prepare these comments, I have asked several King County departments to provide me with their perspective on the DEIS. This letter is a compilation of those comments.

King County applauds the Puget Sound Regional Council (PSRC) for developing the growth vision within the current urban area and for acknowledging the long term protection of our natural resource lands and rural areas consistent with the state Growth Management Act. We support the proposed density increases that would result from the Metropolitan Cities Alternative (Alternative 2) and the expanded transportation network as envisioned in the Larger Cities Alternative (Alternative 3.) Please refer to our comments in Section I for the explanation of our recommendation for a preferred growth alternative.

King County is supportive of the creation of a fourth policy board focused on Climate Change and the Environment. We believe that this board would complement the existing three boards on Transportation, Growth Management, and Economic Development. The protection of our environment is truly an interjurisdictional issue that would benefit from a dedicated forum at the PSRC.

Attached to this letter are more specific and technical suggestions on how best to move the region forward. I trust you will find our comments beneficial as you begin to shape the preferred alternative growth pattern for the region.

I. Growth Distribution Alternatives

We recommend that the preferred growth alternative be drawn from the best components from first three alternatives analyzed in the DEIS. We do not support the fourth alternative, Smaller Cities, because it calls for the greatest dispersion of housing and employment. Specifically, we support a hybrid of Alternatives 2 and 3 because they depict the greatest share of growth going to the largest cities and centers and the smallest share going to the rural areas.

We would like to see that any growth proposal based on Alternative 2 accommodate the projected growth and employment in a way that maintains livability, such as through a focus on centers. We recommend that the Vision 2020 Update direct population and employment growth to designated centers, rather than to jurisdictions. The centers-based planning approach was first introduced in the original Vision 2020 plan adopted in 1990. Focusing growth in centers continues to be desirable to promote transit use and walking between closely spaced activities.

Additionally, the newly revised Commute Trip Reduction (CTR) legislation requires each region to develop regional CTR plans that emphasize more intensive trip reduction policies in centers through the creation of Growth and Transportation Efficiency Centers. The Vision 2020 Update should recognize the importance of centers as a growth strategy. This will help facilitate jurisdiction planning and development of the more intensive trip reduction policies and programs for specific growth centers.

Please note that the first three alternatives forecast a greater share of growth going into King County than recent trends. For decades, King County has received a diminishing share of the region's population growth: 46.6 percent in the 1980s, 43.6 percent in the 1990s and less than 40 percent thus far in the 2000s. Alternatives 1, 2, and 3 will raise that share to a level last seen in the 1980s. This could only be acceptable with appropriate mitigation such as improved infrastructure and enhanced regional environmental controls.

We are concerned that the alternatives do not accurately reflect growth trends in King County because unincorporated urban areas are treated as a separate geography. In King County, almost all unincorporated urban areas are associated with an existing city. These areas will grow as their adjacent cities will grow and not in a separate and distinct way. We expect the preferred growth alternative to identify all of unincorporated urban King County as part of a city. The King County Countywide Planning Policies includes a map, Interim Potential Annexation Areas, depicting the association of urban unincorporated areas with adjacent cities. This map can serve as the basis for your further work.

The preferred growth alternative must also be evaluated in relation to climate change. We recommend that the reduction of vehicle miles traveled (VMT) be used as the primary metric for ensuring benefits from climate change, air quality, efficient transportation, active living, land use plans and preservation of open space.

Finally, the results of the alternatives are difficult to interpret. An explanation of the working hypothesis about the reasons the results turned out as they did would be beneficial. It is also difficult for the average person to imagine what land use would look like under the different

alternatives and how significant the impacts would be. An effort should be made to help “visualize” the vision in terms and illustrations that make it meaningful.

II. The Transportation System

We support shifting a greater share of growth to centers outside of Seattle and Bellevue, and to restricting the share of growth designated for rural areas. However, we continue to support designation of Seattle and Bellevue as regional centers, having a greater scale and level of regional access than other centers within King County. A transportation strategy to maintain regional centers without incurring added congestion and long distance auto commuting should emphasize intensive transit service in the core of the region, management of freeway HOV lanes to offer high quality bus service in other regional corridors, and pricing and management of freeways to shorten average commute trips and limit low-value discretionary travel.

The Supplemental Draft Environmental Impact Statement (SDEIS) should examine mode split for the preferred alternative in greater detail than is done in the DEIS in Figure 5-3-4 on page 5.3.14. We recommend setting mode split goals for centers and then evaluating the preferred alternative based on its ability to meet these goals within centers. The mode split goals should include numbers for all non-single-occupant-vehicle trips including transit, bicycling, walking, carpooling, vanpooling and other as evaluated by the census.

The analysis assumes that the transportation improvements based on Destination 2030 are held constant and tests which land use options work best with them. We recognize that it is difficult to analyze simultaneous changes to both transportation and land use. However, a change to the regional land use vision should only be made in the context of policies that will align the new vision with a transportation strategy that will achieve it. Existing transportation plans have been formulated to serve the existing vision, and they will need to be revisited and potentially changed if the vision is substantially amended.

III. The Environmental Baseline

A. Climate Change

In March of this year, I issued a series of four Executive Orders (attached) on climate change. These orders underscore the connection between global warming, land use, and transportation.

King County recommends that the PSRC take a closer look at the effect of land use on impacts to global climate change. To do so, we recommend adding a Climate Change Issue Paper to outline the current state of the environment, factors contributing to climate change, and new initiatives to reduce and eliminate impacts from climate change. King County would like to work with the PSRC and the University of Washington’s Climate Impacts Group (CIG) to develop this issue paper. Climate change will also affect public health. Among the likely health effects of climate change are mortality and morbidity related to urban heat islands, respiratory system impairment, and social or economic instability related to water supply uncertainty. (Greater details about climate impacts are outlined in the attached CIG white paper. An additional attachment outlines King County concerns related to climate change impacts on health.)

There is growing support within the four counties of the PSRC for concerted action to reduce greenhouse gas (GHG) emissions as evidenced by the growing number of Puget Sound cities that have declared their intention to meet GHG reduction goals modeled upon the international Kyoto Resolution. Below is the list of fourteen cities within the PSRC region that have signed on to the U.S. Conference of Mayors' Climate Protection Agreement.

Mayor	City
Peter B. Lewis	Auburn
Darlene Kordonowy	Bainbridge Island
Noel Gibb	Burien
Gary Haakenson	Edmonds
Ray Stephanson	Everett
Ava Frisinger	Issaquah
Mary-Alyce Burleigh	Kirkland
David Hutchinson	Lake Forest Park
Mike McKinnon	Lynnwood
Rosemarie Ives	Redmond
Kathy Keolker	Renton
Greg Nickels	Seattle
Robert L. Ransom	Shoreline
Bill Baarsma	Tacoma

We recommend that PSRC consider the following actions related to climate change:

1. Create a fourth board – in addition to land use, transportation and economic development – for “Climate Change and the Environment”;
2. Establish reduction of vehicle miles traveled (VMT) as the primary metric for ensuring benefits from climate change, air quality, efficient transportation, active living, land use plans and preservation of open space; and
3. Develop greenhouse gas reduction criteria for approving transportation projects and land use plans

(Greater Details about these specific recommendations are outlined in an attachment to this letter.)

B. Reclaimed Water

Reclaimed water will play an increasingly important role in water supply planning for the Puget Sound region between now and 2040 along with other water resource management tools such as conservation programs and regional system interconnections. Each of the alternatives described in the DEIS includes opportunities for utilizing highly treated

wastewater in varying amounts depending upon the projected population growth and its location.

Ecology is currently developing rules to enforce existing regulation on withdrawals from surface water and groundwater. Driven by instream flow requirements and other ecological considerations, the likely future result will be that individuals and businesses that currently rely on these sources, e.g. golf courses and farms, will be required to seek other sources of water. In this environment, reclaimed water can play an important role as a sustainable, drought-proof source of non-potable water for irrigation.

King County, along with the Cascade Water Alliance has engaged major water purveyors in the regional water supply planning process that is currently underway. As part of this regional effort, reclaimed water, its benefits and barriers for use, are being analyzed for future water supply planning processes by individual governmental entities. A final report is expected at the end of 2006.

C. Regional Water Supply

King County and Cascade Water Alliance have initiated a regional water supply process that will address, among other water issues, credible long-term demand forecasts, alternative supply options, tributary streamflow needs for fish, use of reclaimed water, and climate change impacts. Initial technical reports on some of those topics will be completed by the end of 2006 and others some time in 2007. The SDEIS should integrate the products of this effort.

D. Puget Sound Ecosystem

The SDEIS should include enhanced discussion of Puget Sound. The prospect of increasing stress on Puget Sound resulting from future growth and climate change make it imperative that the work required to restore and protect the marine ecosystems of Puget Sound be fully embraced by the PSRC. The work of bringing Puget Sound back to a healthy state will enable the ecosystem to support hundreds of species of wildlife, while also serving a critical role in the economic and recreational activities of the region.

Below is the Governor's Charge to the Partners creating the Puget Sound Partnership, and a link to the Puget Sound Partnership Interim Report to the Governor:

"I am charging the Puget Sound Partnership with the task of engaging a broad cross-section of agencies, tribes and the public to develop recommendations for me, the Legislature and Congress for preserving the health, goods and ecosystem services of Puget Sound, and to help educate and enlist the public in achieving recovery of the Sound by 2020," Gregoire said.

http://www.pugetsoundpartnership.org/reports/PartnershipInterimRpt_7-10-063.pdf

E. Flood Control

Population change (distribution and growth) along with climate change impacts have a profound affect on areas that are susceptible to flooding. Population growth and location would result in land cover change, and additional impervious surface areas for all

alternatives. The impact would affect changes to flood zone flow volumes, rates, and timing.

First, for the SDEIS, the PSRC should consider mapping frequently flooded areas. This would consist of mapping flooding within the valleys at several frequencies, including the two-year, five-year, and 10-year, 25-year, 50-year and 100-year floodplain boundaries. The relative risk for development across the floodplain could then be readily determined, as well as an annualized summary damage potential for each parcel affected by the various risks.

At a minimum, the SDEIS should include an assessment of the potential flood risk based on FEMA flood insurance study maps or other best available flood data. The preferred growth distribution alternative, from a flooding perspective, should be the one that encourages growth in those areas outside of the major river floodplains.

Secondly, the SDEIS should identify and map all levees and possibly designate them as regional utilities. The maps should also note critical resources or land activities within those boundaries. This would provide an assessment of risk related to population/employment locations resulting from changes in flood flow volumes, rates, and timing for various storm events. The Vision 2020 Update should recognize the vulnerability of people and structures located behind existing levees and revetments and assess the impacts of focusing growth in those vulnerable locations.

F. Drainage: Transportation Impervious Surface Area

The SDEIS should include an expanded discussion on the transport (movement, travel pattern) of goods and services. This would include some measure of goods and or services by type (e.g. fuels, foods, mail, building materials) and volume. It would also include by vehicle type (plane, truck, ship, and rail). This is based on the fact that roadways are an extension of the drainage infrastructure. Any spills, leaks, and contribution of debris to impervious surface areas have impact on receiving waters and possibly habitat areas.

Further, we recommend that PSRC include an expanded discussion on emergency service delivery related to major disasters, as it relates to fires, toxic releases, explosions, earthquakes. The discussion should include water delivery and drainage system impacts.

IV. Health Impacts

The role of land use planning and transportation systems as determinants of health are well described and explained in the Issue Paper, "*What's Health Got to Do with Growth Management, Economic Development and Transportation?*" The alternatives most consistent with the concepts and health benefits expressed in the Health Issue Paper are Alternatives 2 and 3. Street networks with high connectivity, transit opportunities, non-motorized trail or sidewalks opportunities, and compact, mixed-use development close to transit are features of the built environment more likely to occur under these types of alternatives than under the Alternatives 1 and 4. However, as noted in the Information Paper, "*At The Microscale: Compact Growth and Adverse Health Impacts*", air quality and noise levels in high density or intense land use settings

can negatively affect public health. The potential health impacts in these situations largely stem from VMT and vehicle speeds in proximity to residential uses, schools, and workplaces. Additional health impacts related to the development patterns of the Alternatives 1 and 4 are the likelihood that people will become more isolated because of loss of community connections to neighborhoods, recreational activities and geographical areas of interests. Isolation in turn, can lead to poor individual and community health. These health outcomes make these alternatives undesirable.

To fully realize all potential health benefits associated with the type of development pattern expected in Alternatives 2 and 3, the SDEIS and/or multi-county planning policies should include a discussion of, and mitigation measures to counter the increased noise levels and degraded air quality associated with high density settings envisioned in the “regional geographies” and/or “regional growth centers.” Examples of concepts that should be presented in the SDEIS and multi-county planning policies to mitigate VMT-related noise and air quality impacts are traffic engineering practices; urban design techniques; and noise-reducing construction materials and techniques. The World Health Organization noise program provides additional information about the effects of noise on health (see Public Health attachment). Key to the success of the alternatives 2 and 3, or similar alternatives is mitigating perceived and real problems about the quality of life in future communities and neighborhoods. Controlling noise will be a critical element in ensuring that a compact, mixed-use development patterns is truly a desirable, attractive, and healthy choice for future populations.

Another major area of concern is the effect of future land uses and transportation systems on regional food security and food systems. Other planning processes have begun to integrate food security with regional planning and this should be considered in the DEIS as well (see Public Health attachment). In addition, inclusion of local food systems experts and practitioners, such as the Acting Food Policy Council, should be consulted for the SDEIS and development of multi-county planning policies phase of the Vision 2020 Update

Other critical aspects of environmentally-based community health that should be addressed in the SDEIS and/or multi-county planning policies are ensuring adequate recreational opportunities, access to non-motorized transportation, public space, access to healthy foods, and connectivity between adjacent neighborhoods. (see Public Health attachment)

V. Environmental Justice

A. General Comments

The analysis and discussion of Environmental Justice in the DEIS should be commended as this topic is not typically included in environmental planning. It can serve as a primer to those in the broader planning community and DEIS audience who may be unfamiliar with the topic. In particular, the incongruence and difficulties that most environmental justice communities face in terms of where they live (housing), where they work (jobs), and their mode of travel (transportation choices) is well highlighted and generally accurate given the regional planning scale for each alternative in the DEIS.

The only place in the document that addresses environmental justice deals with minorities and the poor under the definition in federal legislation. Although some consider Tribes

as minorities (and poor) this isn't their status. The SDEIS should have a place to address Tribal issues and concerns in a spirit of Environmental Justice as the Tribal people do suffer a disproportionate degree of consequences given their reserved Treaty rights. For example, the tribes receive minute amounts of benefits from a majority of development but in the case of salmon and shellfish degradation they shoulder a 50 percent share of the cost.

B. Suggested Areas of Environmental Analysis to Expand

The environmental analysis needs to be expanded in terms of the impacts that environmental justice communities are likely to experience under all alternatives. The impacts to these populations, which derive in part from built and natural environment conditions, manifest themselves as health disparities. Health disparities occur when certain groups, based on income, race, age, ethnicity or a combination of these factors, bear a disproportionate burden of illness and early death relative to the population as a whole. For example, environments that promote physical inactivity, stress, and poor nutrition contribute to rising rates of obesity, hypertension, and diabetes. Another example, common among environmental justice communities located in industrial areas where land uses generate relatively higher levels of particulates, is that there are also higher rates of respiratory disease and asthma-related hospitalizations.

If environmental justice communities and the health disparities that characterize these communities are to be reduced in terms of their size and location, some type of cumulative impacts analysis is needed. A concept called “total maximum daily load” (TMDL) is used to determine allowable pollutant levels in impaired water bodies. Applied to environmental justice communities, a TMDL-like analysis would call for documenting existing levels of health-diminishing features of the built and natural environments, specific pollutants, and other relevant environmental factors. This information could serve as a baseline against which future planning decisions, land uses, and projects could be evaluated relative to equity and health effects on environmental justice communities. This idea should be further explored as part of the multi-county planning policies that will be included in the SDEIS.

C. Environmental Analysis and Mitigation Concepts to Pursue

The degree to which the Vision 2020 Update and future planning processes at the sub-regional level can create conditions allowing environmental justice populations to avoid health-degrading land uses and related policies, will determine if the environmental justice populations identified in the DEIS contract or expand. Reducing environmental impacts to these environmental justice communities can be accomplished through addressing the causal roots of health disparities. In particular, the planning and design community will need to address areas where living conditions and land uses are allowed that erode good health through lack of safe and affordable housing; lack of living wage jobs within reasonable commute times; an overabundance of stores specializing in alcohol, tobacco, and low-nutrition foods; a scarcity of grocery stores; a lack of recreational and transportation facilities; and exposure to multiple sources of air, water, and soil pollution.

A common experience among environmental justice communities is that they are approached too late in a planning process about topics that appear not to address the environmental conditions most detrimental to their quality of life. The Vision 2020 Update, through mitigation measures and/or multi-county planning policies, should provide the foundation for future sub-regional planning processes to alter this unproductive communication and outreach pattern between government agencies and environmental justice communities. The environmental justice communities need to be approached early on, prior to the scoping process, to learn about the environmental conditions the environmental justice communities consider most relevant and important. The onset of the formal planning process can then be better informed about how to integrate, address, and propose changes to the conditions in environmental justice communities to the extent possible.

VI. Evaluation Criteria for Selecting a Preferred Alternative

(This section refers to Appendix C of the DEIS.)

A. Overview

Please revise the following bullets:

- Create an efficient land use pattern for provision of infrastructure, facilities, and services, *and to mitigate the effects of climate change and to enhance environmental protection and recovery.*
- *Protect and restore* the natural environment.

B. Environmental Measures

- Please consider adding new subjects for species diversity, ecological integrity, and ecological footprint. King County is available to assist PSRC in drafting potential measures for these new subjects. Further, we question why 'historic and cultural resources' are considered under the Environmental Measures as opposed to a more general heading relating to quality of life or social factors.
- Climate change should be measured as metric tons (2205 pounds per metric ton) to be consistent with national and international accounting principles and not short tons (2000 pounds per short ton). Climate change impacts should also be included in the land use and transportation evaluation criteria and not just in the environmental criteria. The same "Tons of Carbon Dioxide per year" measurement can be applied to land use and transportation.

C. Economic Measures

Please consider adding new subjects for natural resource based industries such as agriculture and forestry.

D. Land Use Measures

Please consider adding land cover as a new subject to be measured.

E. Transportation Measures

Based on our recommendation in Section II, above, the evaluation criteria should include more complete measures of mode split. We recommend that the mode split evaluation not be limited to commute trips and that active transportation (walking and biking) and carpooling (including vanpooling) be included.

Norman A. Abbott

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If you have further questions about the recommendations presented in this letter, please contact Karen Wolf, Sr. Executive Policy Advisor, at 206-296-3423. Thank you for your consideration.

Sincerely,

Ron Sims
King County Executive

Enclosures (9)

cc: Stephanie Warden, Director, Department of Development and Environmental Services
Pam Bissonette, Director, Department of Natural Resources and Parks
Harold Taniguchi, Director, Department of Transportation
Dorothy Teeter, Interim Director, Department of Public Health
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