Overall themes for a GMPC comment letter on the VISION 2050 DSEIS as prepared by the IJT for consideration at the March 27th GMPC meeting.

Introduction: King County has been successfully implementing VISION 2040 by focusing the majority of growth into the cities and the urban growth area, creating vibrant urban centers, protecting natural resource lands and rural areas, and focusing public investments to support efficient use of the land. King County intends to stay on this pathway of creating a sustainable future for our residents. VISION 2050 should not veer from this successful foundation but rather 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, 2012 – before both Sound Transit 2 and Sound Transit 3 were approved resulting in a 116 mile regional light rail system upon completion. 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.

Overall Themes	Assessment of the Alternatives
(Based on 2018 Scoping Letter)	
 The growth pattern should maintain Integrity of the Urban Growth Area: Guide growth where it's already going: inside the UGA Avoid environmental impacts of rural growth Avoid growth in proximity to the UGA, which increases pressure for UGA expansion 	 Reset Urban Growth increases regional share of pop growth to rural (5 -> 6%), and urban unincorporated (5 -> 12%) over Stay the Course. Transit Focused Growth decreases growth near the UGA boundary, compared to Stay the Course: Stay the Course: Stay the Course: King County = 5%; Region = 9% Transit Focused Growth: King County = 3%; Region = 6% Reset Urban Growth: King County = 6%; Region = 10% 1,000 more acres of Impervious surface in Reset Urban Growth than Stay the Course. Reset Urban Growth increases share of low density housing
 The growth pattern should prioritize cities and centers for accommodating growth: Maintain structure of existing Regional Growth Strategy, directing job and population growth to cities Increase opportunities for vibrant urban centers Increase opportunities for people to live to close to jobs and services 	 All alternatives have at least 82% pop growth, 92% jobs to cities. Pop/Job Growth to Metro & Core cities: Stay the Course: King County = 80%/90%; Region = 63%/80% Transit Focused Growth: King County = 84%/91%; Region = 65%/79% Reset Urban Growth: King County = 79%/88%; Region = 56%/73% Pop growth spread to urban unincorporated, rural in Reset Urban Growth, away from cities with centers, King County has a low share of growth near border, offsets other counties and overall outcome. Reset Urban Growth shifts housing development to lower density places. Transit Focused Growth has the highest share of high density growth.

Overall Themes (Based on 2018 Scoping Letter)	Assessment of the Alternatives
The growth pattern should build on the opportunities of the expanded transit network:	 Reset Urban Growth decreases the share of population and jobs near high capacity transit, and increases growth near the edge of the UGA, particularly outside King County.
 Prioritize development that can take advantage of recent and planned investments based on furthering racial and social equity outcomes Encourage planning for centers that will get transit in the future Maintain a centralized growth pattern 	 Growth in proximity to high capacity transit: Stay the Course: King County = 64%; Region = 48% Transit Focused Growth: King County = 84%; Region = 75% Reset Urban Growth: King County = 61%; Region = 44% Transit Focused Growth locates 27% more pop and job growth near high capacity transit than Stay the Course. Both Transit Focused Growth and Reset Urban Growth increase transit trips. Reset Urban Growth has fewer jobs near transit than Stay the Course. Reset Urban Growth has more transit boardings than Stay the Course, buoyed by KC Metro/Sound Transit ridership and increased share of growth to King County metro cities.

Overall Themes (Based on 2018 Scoping Letter)	Assessment of the Alternatives
 The growth pattern should advance racial and social equity as a cornerstone of the Plan: Prevent and mitigate for displacement Recognize and address historic development patterns that have led to disparate negative outcomes for Native Peoples, low income people and communities of color, and immigrants and refugees. Create opportunities for development near transit, jobs, schools, parks, and other attributes of vibrant cultural communities Create opportunities for community-based placemaking rooted in racial and social equity 	 Transit Focused Growth brings more low income communities and communities of color closer to transit, Reset Urban Growth does the opposite. Greater access to parks/open space in both alternatives. Reset Urban Growth has a worsened balance of jobs and housing for low-income communities; improved balance for communities of color. Reset Urban Growth has a lower displacement risk, but less access. Displacement in Transit Focused Growth: more high density dev. In tracts with >50% people of color or low income. Reset Urban Growth has more accessible jobs by transit for low income tracts (people of color, too but lags Transit Focused Growth), buoyed by KC Metro/Sound Transit + metro city growth share increase (over Stay The Course). Access to opportunity stronger in Stay the Course for Pierce and Snohomish Counties. Gains in opportunity in Reset Urban Growth are likely due to increased King County metro cities share (over Stay the Course). Population in areas of moderate to very high opportunity: Stay the Course: King County = 82%; Region = 56% Transit Focused Growth: King County = 82%; Region = 59%
 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: Acknowledge that achieving the Regional Growth Strategy is linked to meeting affordable housing goals because otherwise, people will be pushed out of the county Connect housing with transportation by increasing opportunity near transit Mitigate the effects of displacement throughout the region and especially in communities in proximity to high-capacity transit 	 Reset Urban Growth shifts housing development to lower density places and has the lowest share of middle density growth. Transit Focused Growth has the greatest share of high density growth. Displacement risk in majority low income areas is very high all scenarios. Reset Urban Growth decreases displacement risk overall. Density – higher density = greater opportunity for affordable housing; moderate & high density: Stay the Course: King County = 72%; Region = 61% Transit Focused Growth: King County = 83%; Region = 76% Reset Urban Growth: King County = 67%; Region = 57%

Overall Themes (Based on 2018 Scoping Letter)	Assessment of the Alternatives
 The growth pattern should avoid environmental impacts and reduce the greenhouse gas emissions: Concentrate growth near high-capacity and build on multimodal infrastructure in ways that further environmental justice Reduce projected pollutants, prioritizing areas disproportionately impacted by environmental racism Limit the increase in impervious surface 	 Reset Urban Growth increases GHG emissions, though not much more than Stay the Course. Projected pollutant emissions – CO₂ – change from base year: Stay the Course: Region = -13% Transit Focused Growth: Region = -16% Reset Urban Growth develops more land, including near sensitive areas. Added acres of impervious surface, 2017-2050: Stay the Course: King County = 9,100; Region = 23,200 Transit Focused Growth: King County = 7,300; Region = 19,600 Reset Urban Growth may increase the need to construct or expand infrastructure in areas not currently served, increasing impacts compared to Stay the Course. Reset Urban Growth has no benefit for reducing average trip times for any regional geography.