

April 29, 2019

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

RE: Vision 2050 DSEIS comments from the City of Auburn

Dear PSRC:

The City of Auburn appreciates the opportunity to provide comments on the Draft SEIS prepared by the Puget Sound Regional Council for the Vision 2050 update. The City understands that planning for the regional growth spread across four counties and 80 cities is a significant undertaking and poses a number of challenges. The municipalities represented in this plan range in size from a few hundred to nearly three-quarters of a million people and represent a mix of urban and rural areas, as well as a variety of transit needs and current access.

The City of Auburn holds a strong commitment to PSRC's vision for the vibrant, sustainable growth of our region, a fact underlined by our long-standing support of previous Vision strategies and by the continued certification of our own Comprehensive Plans. In the last 20 years, Auburn has transformed it's downtown core into a transit-oriented community with the addition of a Sounder station, commuter rail line, a 636-stall transit parking garage and more than 1,000 multifamily dwelling units within a quarter mile of the transit center. Work is also underway for a second garage that will bring more than 500 additional stalls on-line within the next four years.

Draft SEIS Alternative Preference

As a Core City, Auburn generally supports the principles of the *Transit Focused Growth* alternative. We believe that this approach is in alignment with City of Auburn objectives and that it is the appropriate aspirational objective for the four-county region.

As this region grapples with significant population growth and employment over the next 20+ years, it is essential that we implement policies, processes, incentives and other measures that encourage more efficient use of existing urban growth areas. This approach mitigates the environmental, economic and social impacts associated with sprawl.

Comments on Draft SEIS Preferred Alternative

1. The City of Auburn holds a unique geographic position, located partially within King County and partially within Pierce County. It is also divided by both broader urban areas to the north, west and south, and abrupt urban/rural demarcation to the east. These positional characteristics result in portions of Auburn that are well suited to prepare for, and embrace, a Transit Focused

Growth alternative and other portions that are many decades away from being able to support high density, transit oriented development.

2. Despite the presence of a high-capacity commuter rail line, a regionally significant commuter transit station, and a significant existing and planned supply of commuter parking, there is a lack of local transit services to the high-capacity Auburn Sounder facility. Most residents of Auburn cannot use local transit to get to the Sounder station. This results in three outcomes: (a) fewer people utilize Sounder trains, (b) individuals who do use Sounder trains must drive their vehicle to the station, adding to local congestion and the need for additional expensive parking facilities, and (c) lower income neighborhoods whose residents cannot afford a vehicle do not have access to the commuter line, leading to community inequity.

The success of the Transit Focused Growth alternative hinges directly on robust local transit service. While this alternative places heavy emphasis on population and employment growth in close proximity to high capacity transit centers, there remain many opportunities in our community to improve connections for residents that live beyond a walkable distance to regional transit service. In addition, Auburn's ability to successfully contribute to a Transit Focused Growth alternative is ultimately contingent on service levels that are determined by outside transit providers.

3. Auburn believes that establishing land use policies targeted at greater density within close proximity to high-capacity transit is an important priority. However, such density increases would pose substantial challenges within a developed 125-year-old downtown core and would require significant financial investment. Auburn's success with increased density and transit-oriented development in recent years has come as a result of publicly funded multi-million dollar upgrades to portions of its utility infrastructure. Additional publicly funded multi-million dollar investments in utility infrastructure upgrades would be necessary in order for Auburn, and other communities, to continue achieving these types of regional objectives.

Area-wide upgrades in stormwater, water supply, sewer, fireflow, and power are a critical component of such density increases. However, many of these systems were developed decades ago to serve the lower density demands of the time. Creating systems designed to meet increased residential density is not simply a matter of developer improvements to individual properties, it is a matter of carrying out full utility system upgrades that can serve the increased demand as a whole. Beyond stressors to the current utility infrastructure, such increased density would require upgrades to mobility and transportation systems, the addition of new public park and gathering spaces, and expanded police and fire services.

Expansion of these types of services and systems are not fully funded through taxes and one time permit and impact fees. The only way to fully implement the Transit Focused Growth scenario is to fully fund investments in utility upgrades and the expansion of park and public safety services.

4. The Transit Focused Growth alternative assumes that 75% of the region's population and employment growth will occur within $\frac{1}{4}$ to $\frac{1}{2}$ mile of a high-capacity transit station and that this growth would occur primarily in Metropolitan Cities, Core Cities, and HCT Communities. Auburn understands that this is a regional aspiration, however it is important to note that significant

capacity and growth analysis needs to occur within each of these communities in order to understand whether that goal can realistically be met.

As a historic community that is already fully built out within proximity of the existing high capacity transit station, it will be difficult for the City to **force** high density development to occur within these areas. Some parcels are occupied by schools that are not going to be redeveloped, some parcels are occupied with transit garages (whom do not require housing to be built into their structures and are not required to pay traffic impact fees), some areas are occupied with clusters of 80-year-old homes where a developer will be faced with the complexity of buying multiple homes and aggregating lots for redevelopment, and some parcels are occupied with well-established grocery stores and hospitals. Opportunities to create high density housing exists at all of these locations, but the pace at which it happens will be difficult to predict, hard to force, and filled with complexity along the way. Redevelopment that is considered economically viable in Seattle, Tacoma, or Bellevue is not economically viable in Auburn and many other communities. Vision 2050 needs to reflect this reality.

5. Vision 2050 applies to the full span of the four-county region. The City of Auburn believes that the Transit Focused Growth alternative is the appropriate approach for the urban area that stretches from Everett to Tacoma and from Bremerton to Bellevue, but it will be a significant challenge to successfully implement this alternative in areas that extend beyond this large urban area. As noted in comment #2 above, although Auburn is positioned within the larger Everett/Seattle/Tacoma urban area, it will be difficult to see the Transit Focused Growth objectives extend throughout our community. While the City of Auburn will appreciate being the beneficiary of future transportation investments given the presence of a high-capacity transit center within our community, this alternative has the potential to hinder other future regional infrastructure investments in other communities or to devalue their previous multi-decade planning investments. Vision 2050 should not disadvantage other communities or negate the work and investment that those communities have completed in their efforts to successfully comply with GMA.

Thank you for the opportunity to comment on the Draft SEIS for Vision 2050. The City of Auburn looks forward to future regional collaboration and is appreciative of the time and energy that PSRC has committed to this effort.

Sincerely,

A handwritten signature in black ink that reads "Nancy Backus". The signature is written in a cursive, slightly slanted style.

Nancy Backus
Mayor