Rivera, Eva

From: Ken Johnsen <kjohnsen@yakimavalleytrolleys.org>
Sent: Monday, November 16, 2026 4:47 PM
To: Martin, Trevor; Ask Planning; Preston, Bill
Subject: Comment on Comprehensive Plan 2050, PRJ#001-25 and SEPA#017-26 (Yakima Valley Trolleys)
Attachments: YVT SEPA Comment 2026-11-16.pdf

Mr. Preston and Mr. Martin,

Attached is Yakima Valley Trolleys' written comment on the City of Yakima Comprehensive Plan 2050, PRJ#001-25 and SEPA#017-26. I am submitting it before the 5:00 pm November 16, 2026 close of the reopened SEPA comment period, and for the record of the November 23, 2026 Planning Commission hearing.

In brief, YVT supports timely adoption of the plan provided it retains the previously adopted language on the City's historic railway, and asks the City to restore that language in three places.

Please:
- include this comment in the SEPA record and in the Planning Commission and City Council hearing records;
- provide copies to the Planning Commission and the Historic Preservation Commission;
- add Yakima Valley Trolleys as a party of record; and
- confirm receipt by reply.

Thank you.

Ken Johnsen
President, Yakima Valley Trolleys
kjohnsen@yakimavalleytrolleys.org

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November 16, 2026
Via email

Bill Preston, P.E., SEPA Responsible Official and Community Development Director
Trevor Martin, AICP, Planning Manager
City of Yakima, Department of Community Development
129 N. 2nd Street, Yakima, WA 98901

Re: City of Yakima Comprehensive Plan 2050, PRJ#001-25 and SEPA#017-26
Comment on the Revised Determination of Nonsignificance and on the draft plan, for the SEPA record and the November 23, 2026 Planning Commission hearing record.

Dear Mr. Preston and Mr. Martin:

Yakima Valley Trolleys (YVT) is the nonprofit that operates and maintains the City's electric railway system and museum, the National Register listed Yakima Valley Transportation Company, under an Operation License Agreement with the City.

YVT supports timely adoption of the Comprehensive Plan 2050, provided it retains the language on the City's historic railway from the current plan, the adopted Comprehensive Plan 2040. This comment addresses three places where the November 13, 2026 drafts change that adopted language. It is not YVT's complete comment on the plan. We ask that the City retain the previously adopted language in each place. Doing so requires no City funds.

The three changes are as follows. Page references are to the Volume 1 clean version updated November 13, 2026.

First, Policy 4.4.2(b), page 4-12. Adopted Policy 12.4.2(b) reads: "Develop long-range capital improvement plans with the Capitol Theatre (Capital Theatre Committee) and YVTC (Yakima Valley Trolleys)" (Comprehensive Plan 2040, page HP-7). The draft deletes "and YVTC (Yakima Valley Trolleys)."

Second, the City Facilities paragraph, page 4-9. The adopted plan describes the City as steward of "the Yakima Valley Trolley, which includes associated buildings and track," and describes the trolley and the Capitol Theatre as "important as anchors for downtown and a growing tourism market" (Comprehensive Plan 2040, page HP-4). The draft replaces this with "the site of a small portion of the Yakima Valley Transportation Company Electric Railroad" and adds new historical statements. The adopted paragraph was still in the September 2026 draft chapter posted for public review. The replacement appears in the November 13 version.

Several of the new statements are inaccurate. The City is steward of an operating electric railway, not a site. Its Operation License Agreement with YVT covers "the City's electric railway system," including its track, overhead wiring and rolling stock.

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The Yakima Valley Transportation Company was an electric interurban railway that carried passengers and freight both inside and outside the city limits. Its passenger service to Selah was not "incidental." The 1935 state order that ended it describes "interurban passenger service" operated "on a regular schedule" under a Yakima County franchise dated October 7, 1907 (Department of Public Works of Washington, Cause No. 6832). Yakima Valley Trolleys is not a renamed Yakima Interurban Lines Association. YVT was incorporated in 2001 and is a separate legal entity.

Third, Land Use Policy 2.4.4(a), page 2-32. Adopted Policy 2.4.4(A) lists "provisions for a future trolley" among the key elements for Yakima Avenue (Comprehensive Plan 2040, page LU-24). The draft deletes those words.

These changes are outside the proposal as the City's determination and notices describe it. The Determination of Nonsignificance, the Revised Determination of October 30, 2026, and the Planning Commission hearing notices describe "minor amendments" that "specifically" address climate resiliency, the Housing Element, the transportation elements, and statistical background information. None describes a change to historic preservation policy or to this land use policy.

The environmental checklist was prepared September 23, 2026, before the rewritten City Facilities paragraph appeared in a public draft. Its section on historic and cultural preservation (B.13) does not identify the Yakima Valley Transportation Company and states that "No impact on cultural or historic resources are anticipated as part of this non-project legislative action." YVT therefore objects, not to a Determination of Nonsignificance, but to rewording the Comprehensive Plan in such a way as to marginalize the role of the City's historic railway and Yakima Valley Trolleys in the community. Because the checklist does not identify the historic railway or evaluate the effect of plan provisions on it, including these three changes, retaining the adopted language would resolve YVT's objection and keep the City's description of the proposal accurate. If the City instead keeps the changes, or makes further changes affecting the railway, YVT requests that the checklist be revised to identify and evaluate them and that the threshold determination be reconsidered under WAC 197-11-340.

YVT also asks that existing references to the trolley system elsewhere in the draft, including Volume 2, be retained. We rely on the checklist's statement (A.7) that "Future developments and infrastructure implemented by public and private applicants would be subject to their own environmental review," and understand that to include the 6th Avenue Roadway Improvements project.

Adopted plan language matters to YVT's work. On July 7, 2026 the Council directed that no City funds be used for trolley track infrastructure, with an exception for "donated specific funds or Council approved funds." Grant makers and donors look to the owner's adopted plans when deciding whether to fund work on a City-owned historic property. Keeping the adopted language supports the fundraising the Council has allowed YVT time to pursue.

YVT will provide further comment on these and other parts of the plan, including the new historical statements, before the November 23 hearing, and would welcome the opportunity to work with staff on wording. Please include this comment in the SEPA record and in the Planning Commission and City Council hearing records, add YVT as a party of record, and confirm receipt.

Sincerely,

Ken Johnsen
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P.O. Box 796, Yakima, WA 98907 | kjohnsen@yakimavalleytrolleys.org

cc: ask.planning@yakimawa.gov, Planning Commission, Historic Preservation Commission

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