July 23, 2020
Puget Sound Regional Council
Executive Board
1011 Western Avenue, Suite 500
Seattle, WA 98104

Re: Amendment Ex-1 proposal to VISION2050

Dear Executive Dammeier and Members of the Executive Board:

I write to express Forterra’s support for the regional rural growth proposal submitted by the Growth Management Policy Board. The GMPB arrived at its proposal after many months of discussion, community input, and negotiation. Amendment Ex-1 circumvents these efforts, justifying rural growth in Snohomish County that does not align with key growth management and Puget Sound recovery goals.

Planned rural growth should not be a material element of VISION2050. While rural development capacity exists and Forterra respects and supports existing property rights, we believe the rural growth strategy should aim to minimize versus endorse future rural development. The reasons for this are myriad, but notably:

- Continued rural development worsens the Conversion of Ecologically Important Lands. This Puget Sound Partnership indicator tracks the state of ecologically important rural lands under high pressure from development. These represent 13% of the Puget Sound land area—most of which “lies around the urban fringe, outside of urban growth areas in the Puget Sound lowlands”. While improving in recent years, conversion rates are not yet meeting 2020 targets basin wide.
- Planning for rural growth promotes the conversion of land identified as at-risk and in need of conservation by PSRC. According to data presented in its Regional Open Space Conservation Plan (2018):
  - Since 1950, the region has lost 60% of its farmland. Of that remaining, 36% is unprotected by resource designation or conservation measures. Of the remaining working forest lands, 19% are unprotected by resource designation or conservation measures.
  - The region’s open spaces provide ecosystem services estimated at $11.4 to $25.2 billion each year.
- Habitat loss and degradation from rural development negatively impacts salmon and orca recovery efforts. The draft EIS recognized that important habitat has declined since the adoption of VISION2040, in part a result of rural development.
- Rural development increases the distance between housing and jobs, exacerbates traffic, increases the carbon footprint of regional growth, and is not a cost-effective development pattern for providing supportive infrastructure or services to a growing population.

We understand that growth targets will not change individual decisions about where to live or existing rural capacity. However, despite significant population growth in the last 40 years, Snohomish County has successfully reduced its percentage of rural growth decade over decade. This accomplishment suggests that further improvements are possible. By expanding its commitment to making its cities
and urban areas welcoming, affordable, and attractive places to live, Snohomish County can further reduce pressure to convert rural lands to residential uses and build upon its noteworthy progress in encouraging growth within its existing urban landscape.

For these reasons and more, we urge the Executive Board to reject Amendment Ex-1.

Thank you for your consideration of these comments. We recognize and appreciate the dedication of PSRC's leadership and staff to planning for a sustainable and equitable future, and these comments are respectfully submitted in this knowledge.

Sincerely,

[Signature]

Skip Swenson
Vice President, Policy and Programming
July 20, 2020

The Honorable Bruce Dammeier, President
Puget Sound Regional Council Executive Board
1011 Western Avenue, Suite 500
Seattle, Washington 98104

Dear President Dammeier and Members of the Executive Board:

**Subject:** We oppose Amendment Ex-1 to Vision 2050 to reduce the Core Cities and Cities and Towns Population Allocations and increase the Rural Snohomish County population allocation from three to six percent.

Sent via email to srogers@psrc.org

The members of the Puget Sound Regional Council and the organizations signing this letter share the common goal of recovering the Chinook salmon and the Southern resident orcas. We also share the common goal of addressing the current climate crisis. Vision 2050 has the potential to be an important tool in achieving these common goals.

The Southern Resident Orca Task Force’s *Final Report and Recommendations* calls for Washington to “increase affordable housing and reduce urban sprawl by growing ‘up instead of out.’” The Task Force also recommends promoting “‘live where you work’ to reduce commutes while improving public transportation infrastructure.”\(^1\) Unfortunately, Amendment Ex-1 does the opposite. Ex-1 promotes growing out by shifting growth from cities and towns into the rural area and increasing commute lengths by requiring the larger rural population to drive into cities and

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towns where the jobs are located. Amendment Ex-1 will continue the destruction of Chinook habitat, make Chinook recovery more difficult and costly because of increased restoration needs, and hinder the recovery of the Southern resident orcas.

More rural commuters will also generate more greenhouse gases and more traffic. This will require more roads and highways and will make it difficult if not impossible to meet our greenhouse gas reduction goals while increasing burdens on taxpayers who fund the wider roads.

Less than half of the farmland in Snohomish County is agricultural zones, much of the remainder is in the rural area. Increasing the growth target for rural Snohomish County and then planning for that growth will increase pressure for rural residential development on rural farmland. This will reduce the production of food and other agricultural products and harm Snohomish County’s agricultural industry. With our regional population growth expected to increase dramatically, we need to ensure the region has productive agricultural land.

Some argue the amendment is necessary to address existing rural lots. However, as the Growth Management Hearings Board held “the County cannot base its future planning for new growth on its past development practices if those past practices, as here, do not comply with the GMA. What was once permissible is no longer so. The GMA was passed to stop repeating past mistakes in the future.” Given the harm to the Southern resident orcas and the greenhouse gas pollution from growing out, there are better solutions to the existing pre-GMA lots in rural areas and on natural resource lands.

Vision 2050 should be a plan for our future, not our past. But it will only be a plan for a future that achieves our shared goals if Amendment Ex-1 is rejected.

Thank you for considering our comments.

Very Truly Yours

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Kate Lunceford, President
League of Women Voters of Snohomish County

Kate Lunceford, President
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