Dear members of the Growth Management Policy Board and Regional Staff Committee,

Thank you for the work you have done so far to identify priorities for the Vision 2050 update and outcomes and guidance for the Regional Growth Strategy. As you move towards narrowing the alternatives that will be studied deeply during the EIS, we would like to offer the following comments:

- **On existing RGS alternatives:**
  - Of the RGS alternatives presented, we prefer the Transit-Focused Growth option, as it performs best on most of the screening measures.

- **On new possible alternatives:**
  - We recognize the importance of developing a range of alternatives to understand the different possible outcomes. However, once the screening measures have identified scenarios that perform poorly, we can confidently remove them and develop other scenarios that may make us weigh carefully between the outcomes we have identified.
  - Therefore, we would like to see alternatives refined or a preferred alternative developed in accordance with the objectives and outcomes we are trying to achieve. We should be testing different assumptions to get the best outcomes possible.
    - For instance, if transit-focused growth gets us the best results on many of the outcomes, we should see whether more or less growth near transit improves outcomes.
    - Knowing what we know about policies and growth strategies that reduce GHG emissions, stormwater, or greenfield development, what would an environmental priority scenario look like, especially for communities most impacted by environmental harm?
    - If affordable housing and social equity are also board priorities, what variations of the existing scenarios get us to the best outcomes in these areas. We should prioritize scenarios that maximize affordability.

- **On existing screening measures:**
  - For the “Delay” outcome, this focuses on vehicle travel. Instead, we should use travel time for transit and cars separately, and mode split including people biking and walking.
  - The Board has adopted “social equity” as a key priority for the Vision 2050 update, yet the current screening measure is not able to indicate whether we are improving outcomes for low-income people and people of color through these scenarios - increasing critical investments without displacement. Whether adding more growth in high opportunity areas is a positive or negative thing is unclear, and without a deep board discussion of the different ways this could play out, the board does not have sufficient information to make an educated decision. Therefore, I urge the board and staff to set aside time to discuss the nuances of this measure, or provide a proxy for access to opportunity that is better able to be evaluated: Perhaps access to jobs by transit, or measures of displacement, as soon as the Displacement Risk analysis is available.
Sincerely,

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