Dear members of the Growth Management Policy Board and PSRC staff,

Thank you for the opportunity to provide comments on the VISION narrative and policies on the environment, climate change, and development patterns. The signatories collaborated to compile the following ideas for consideration:

**General comments**

- Consider starting each chapter by describing what PSRC’s regulatory or other role is in these different areas. What has and can it do to drive and measure progress toward policies? (e.g. scoring and funding projects that help stormwater, implementing a growth strategy that preserves greenfields, determining eligibility for Centers by requiring certain environmental analysis.) This will both promote understanding among readers, and help target feedback to areas where PSRC can make the most difference.
- In order to receive the best feedback, PSRC should provide progress updates and identify barriers to implementation for all actions highlighted in VISION.
- Replace the word “citizen” with something inclusive of everyone working, living, and visiting in our region (this applies to multiple chapters in VISION).

**TOD and Centers**

- **Model GTC process for ongoing stakeholder involvement**
  - Consider replicating the innovative Growing Transit Communities model (or one similar) of funding regional partners to provide an equity perspective. Such inclusion adds depth and credibility to policy discussions and results in more comprehensive, more considerate objectives and strategies, and continuing this model was a key recommendation from the GTC.

- **Focus on anti-displacement strategies**
  - Incorporate policies prioritizing anti-displacement strategies in transit-oriented development, and reference a need for strategies providing access to transit-dependent populations living outside of current transit service areas.

- **Transit-supportive densities and land uses**
  - Incorporate policies that require planning for affordable housing around transit stations in addition to market rate housing when adopting transit supportive densities. This can be done through an assessment of local housing needs and action steps to fund or assist in building affordable housing around transit stations.
  - Incorporate policies that coordinate transit, housing, and open space in order to facilitate, maximize, and accommodate connections to green spaces.

**Environment Chapter**

- **Prioritize environmental justice**
  - Acknowledge and establish goals and policies/actions to end inequities in air quality, water quality, climate impacts, environmentally-related health outcomes, access to open space by prioritizing work, resources, and investments in the areas with current deficiencies. MPP-EN-4 is a good starting point, but should be more explicit to this end.
Recognizing inequities across geographies and populations, establish goals and policies/actions to raise air quality in certain focus areas.

Create an environmental & climate justice plan.

Create an interdisciplinary environmental justice team (resourcing frontline community members, or CBOs that represent them, for ongoing work) to identify regional, county, and local actions that, like the GTC model, should be resourced to participate.

- **Highlight indigenous history and role**
  - Acknowledge tribal lands in introductory language ("before it was a major metropolitan area"...) and that preservation of environmental habitats is critical to honoring tribal treaties.
  - Define appropriate and sufficient "tribal participation". Find ways to engage with tribes early and often in a manner defined by individual tribes with different needs.

- **Commit to addressing climate change**
  - Commit to specific and regionally proportional GHG emissions targets.
  - Acknowledge the importance of holistic and equitable GHG reduction strategies. For example, using an equity lens reveals that incentivizing electrification, especially of personal vehicles, may not decrease congestion, would not reduce stormwater pollution from tires and brake pads, and does not provide additional clean, safe, and healthy mobility for those with lower incomes.
  - Approach climate change mitigation and resilience strategies with a climate justice lens, including a just transition to clean energy, working with communities hit first and worst, and solutions that are appropriate for those communities.

- **Focus on holistic, upstream solutions**
  - Promote and implement holistic, upstream policy solutions whenever possible. For example, create land use strategies that not only reduce GHG emissions, but reduce stormwater and VMT and improve healthy and affordable transportation choices.

- **Align VISION with other plans and policies**
  - Revise VISION to align with Regional Open Space Conservation Plan priorities and recommendations.
  - Expand PSRC’s role in achieving environmental policy goals by actively incorporating key recommendations for land use, tool development, and related Regional Open Space Conservation Plan recommendations into VISION policy, comprehensive plan certification, and performance measurement.

- **Water Quality/Quantity**
  - Due to the Hirst decision and subsequent legislation directing local jurisdictions to address the use of permit exempt wells, include language around the protection of water quantity in streams. Sufficient water levels in the upper watersheds are needed to support the recovery of the salmon population and are impacted by rural development and permit exempt wells.
  - Maximize the role of maintaining and restoring natural infrastructure at the watershed scale as a water quality policy.

Sincerely,

Hester Serebrin  Bryce Yadon  Skip Swenson
Policy Director  State Policy Director  Vice President, Policy and Programming
Transportation Choices Coalition  Futurewise  Forterra