June 6, 2019

Puget Sound Regional Council
Growth Management Policy Board
1011 Western Avenue, Suite 500
Seattle, WA 98104

Re: Regional Growth Strategy Preferred Alternative

Dear Members of the Growth Management Policy Board:

Thank you for the opportunity to comment on the Regional Growth Strategy (RGS) update. I write to express Forterra’s support for the Transit Focused Growth Alternative as the RGS preferred alternative, with suggestions to ensure the draft plan addresses critical regional challenges.

Over the past 30 years, Forterra has worked in over 100 Washington cities and counties on projects and programs supporting communities and promoting sustainable land use—during that time protecting over 275,000 acres of open space. Based in Seattle and Tacoma, we are dedicated to the long-term environmental, economic, and social resilience of the Central Puget Sound region. Through this lens, we feel the Transit Focused Growth Alternative will best serve the region amongst the options thus far considered. Notably it:

- Offers the strongest commitment to housing and job creation within our existing footprint, where infrastructure is best able and most cost-effective to accommodate a growing population
- Provides the most opportunities for people to walk, bike, and roll, which is critical for improving public health outcomes generally and addressing health disparities
- Minimizes the negative impacts of regional development on habitat and wildlife, air quality, climate change, and ecological function critical to Puget Sound recovery
- Supports rural economies dependent on a working land base
- Best maintains the places and landscapes that make the region special

For these reasons and more, the Transit Focused Growth Alternative scored best amongst those evaluated and has broad support amongst those providing public comments.

The staff-prepared preferred alternative proposal—representing modifications to the Transit Focused Growth Alternative—reduces the potential regional benefits of the RGS. Of particular concern are its increased rural growth allocations.

Planned rural growth should not be a material element of the RGS. While rural development capacity exists and Forterra respects and supports existing property rights, we believe the RGS 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 (PSP) defined indicator tracks the state of ecologically important rural lands under high pressure from development. These represent 13% of the total Puget Sound land area—most of which “lies around the urban fringe, outside of urban growth areas (UGAs) in the Puget Sound lowlands”. According to PSP, as of 2017 all Puget Sound counties were
failing to meet the 2020 target for this Puget Sound recovery vital sign. The trend is worsening region-wide.

- Planning for rural growth in the RGS 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 recognizes 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 thus urge the Growth Management Policy Board to finalize a RGS preferred alternative more in line with the Transit Focused Growth Alternative population allocation, especially as relates to rural growth allocations.

From an equity perspective, it is not sufficient to stop there. As staff prepares a draft VISION2050 plan, we urge the GMPB to direct that the plan include measures to mitigate negative impacts on vulnerable populations. Specifically, we urge the identification and development of actionable means to provide affordable housing and implement other strategies to address housing, cultural, and business displacement. Additionally, PSRC should anticipate and plan to mitigate the displacement impacts of transportation and other infrastructure projects in partnership with implementing agencies. Finally, as disparate impacts and disparate conditions exist for communities of color, low-income people, LGBTQ residents, and people with disabilities, we suggest adding a chapter in the draft VISION2050 plan specific to addressing equity in these areas.

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 I hope these comments further the discussion moving forward.

Sincerely,

[Signature]

Skip Swenson
Vice President, Policy and Programming