To: Growth Management Policy Board  
From: Transportation Choices Coalition, Puget Sound Sage, Cascade Bicycle Club, Futurewise, Housing Development Consortium, Puyallup Watershed Initiative Active Transportation COI, Downtown On the Go, Climate Solutions, Audubon Washington, Washington Environmental Council, The Emerald Alliance, The Wilderness Society  
Re: Support for Transit-Focused Growth Alternative

Dear Growth Management Policy Board Members,

Thank you for the opportunity to comment on the Regional Growth Strategy (RGS) for Vision 2050. Collectively, our organizations and supporters are looking to Vision 2050 and its components to lead with racial and social equity; to emphasize outcomes of health, equity, and the environment; to focus on action items and implementation of VISION; and to use specific targets and performance metrics to measure success and create accountability. We are very concerned that recent proposed changes to the RGS move us away from a more equitable and resilient future. With that frame in mind, we offer the following comments.

Executive Summary

Our region deserves a growth alternative that takes bold action to address and reduce the impacts of climate change and mitigates the negative impacts on vulnerable populations through targets and actions that can be managed and measured at the regional scale. Our concerns with the preferred growth strategy alternative scheduled for discussion at the June 6th Growth Management Policy Board Meeting, or any alternative that plans for increased growth outside our existing cities and towns, are briefly summarized as follows:

1. None of the proposed regional growth strategies go far enough in planning for climate impacts or reducing GHG emissions and other pollutants sufficiently. Of all the regional growth strategies studied, we prefer the Transit Focused Growth alternative, as it performs best in measures of environment, health, and access to opportunity, but we must continue to recalibrate our plan and actions with the best available science and community input to address environmental justice and our impending climate crisis.

2. Allowing more growth to be permitted in the rural areas and urban unincorporated areas (without a plan for annexation) of Pierce County and Snohomish Counties, as identified in the preferred alternative, is financially and environmentally irresponsible. The preferred alternative contradicts the broad goals of Vision 2050 and the state’s Growth Management Act, both of which seek to improve the built and natural environments for people and wildlife by concentrating growth in urban areas. Our state and local governments cannot afford this growth strategy, and our climate cannot sustain it.

3. Given that there is no growth alternative that significantly reduces displacement pressures on low-income households and communities of color, we need strong actionable measures to mitigate and prevent displacement. Multi-county planning policies alone will not prevent displacement. The region should adopt numeric affordability targets and develop an implementation plan with incentives and compliance requirements, resources for local planning, and new investment in anti-displacement strategies to ensure local jurisdictions adopt the recommended mitigation strategies.
**Additional Context and Support**

*Of all the Regional Growth Strategies studied, we prefer the Transit Focused Growth alternative, as it performs best in measures of environment, health, and access to opportunity.*

- Public support for this alternative was also clear. Unfortunately, all three alternatives fall short of what the region needs to attain by 2050 to minimize the impacts of adding 1.8 million people (and 1.2 million new jobs) to our region’s natural and social ecosystems. We face a considerable challenge dealing with such growth including increased development, reduction in land cover, more transportation infrastructure, decreased habitats, health disparities, various and sustained impacts from climate change, and ongoing displacement of people of color and people with low incomes.

- Focusing growth near transit provides alternatives to driving and reduces the need for greenfield development and expensive and harmful highway transportation infrastructure. Encouraging walkable and bikeable communities with a good balance of jobs and housing provides not only opportunities for physical activity, but allows a majority of trips to be taken with zero emissions.

- While the transit-focused growth strategy performs the best among the three scenarios, it still does not get us to reduce VMT, greenhouse gas emissions, and other pollutants sufficiently to sustain life as we know it in the Puget Sound. Therefore, if anything, we should be doubling down on strategies that move us closer in this direction, rather than developing alternatives that move growth into rural unincorporated areas that will incentivize sprawl and expensive infrastructure (e.g. roads and utilities) and services (e.g. sheriff and fire) that will lead to longer commutes and worse outcomes for public health, the environment and access to opportunity.

- The transit-focused growth strategy improves public health by providing opportunities for people to walk, bike, and roll. Fewer than one in four adults get adequate physical activity. By encouraging transit-focused growth and walkable communities, we will see the benefits of [healthy people and healthy places](#). Active transportation must be part of transit access and regional growth strategies to address health disparities.

*Allowing more growth to be permitted in the rural areas and urban unincorporated areas (without a plan for annexation) of Pierce County and Snohomish Counties is financially and environmentally irresponsible.*

- The PSRC counties and cities cannot afford to pay for the transportation infrastructure that is needed to serve existing residents and will not be able to afford new improvements to serve population increases in rural and unincorporated urban areas. The King County Road Services 2019-20 Line of Business Plan states that its unfunded transportation needs are estimated to be between $250-$500 million, and that funding for capital improvements will be extinguished in 2025 without new revenue sources. Pierce County's current transportation element identifies a current $151 million deficit, and Snohomish’s transportation element identifies a $101 million deficit.

- Increasing populations in rural and unincorporated urban areas (without a plan for annexation) will lead to increases in vehicle miles traveled (VMT), which not only increases greenhouse gas emissions but will also contribute to increases in the use of existing county road facilities that are already suffering from revenue shortages that impact maintenance, operations and safety. There are also likely to be negative impacts on regional centers, which rely on a focused growth strategy to create affordable housing and economic development opportunities.

- In Pierce County, where growth is already being planned in the unincorporated urban areas, their Environmental Impact Statement evaluating that growth indicates that the growth will require additional funding for Fire Services, Parks, Sheriff Services and schools, yet no funding plans are provided. Further expanding growth in these areas of Pierce County (and likely Snohomish County) will exacerbate these funding shortages.

- Increasing growth in rural areas will negatively impact the natural environment, including farmland, rivers and streams. King, Pierce, and Snohomish Counties are all home to river systems ranked as being of the highest in importance for Chinook stocks that serve as a food source for resident orcas and other wildlife. The Governor's
Salmon Recovery Office documents in the *State of Our Salmon in Watersheds* 2018 Executive Summary that “[p]rogress in some sectors, such as hatcheries, harvest, and nearshore restoration, are being offset with challenges in other sectors such as general habitat loss, disease, predation, and invasive species.” We are already losing the battle on habitat protection. Planning more growth outside our existing cities and towns will just make it worse and will make the recovery of the southern resident orcas much more expensive and difficult if not impossible.

- The preferred alternative appears significantly different enough from the alternatives outlined in the Vision 2050 draft EIS, that a supplemental EIS process may be warranted. Additionally, the preferred alternative could well be vulnerable to legal challenges, as the growth strategy clearly diverges from the stated goals of the Growth Management Act.

The measures for mitigating the displacement of vulnerable populations identified in the preferred alternative are inadequate.

- If we fail to effectively prevent displacement, we will not only disrupt communities, but fail to meet our climate goals as people are pushed further beyond the reach of good transit service.

- The Vision update and multi-county planning policies must recognize the need to provide affordable housing and implement other anti-displacement strategies throughout the region and must address housing, cultural, and business displacement. Additionally, PSRC should anticipate and plan for mitigation of the direct and indirect displacement impacts of transportation and other infrastructure projects in partnership with implementing agencies.

- The Vision update and multi-county planning policies should require local governments to prepare anti-displacement plans and to adopt and enforce anti-displacement programs. The development and implementation of these plans and programs should be led by the populations mostly likely to be displaced.

- PSRC is best positioned to implement and enforce anti-displacement and affordability commitments and requirements of local jurisdictions by tying implementation and outcome to certification of comprehensive plans, centers designation, and funding.

- Because disparate impacts and existing disparate conditions exist for communities of color, low-income people, LGBTQ residents, and people with disabilities, addressing displacement, pollution, housing, and climate change is critical to creating an equitable vision, we suggest creating a specific equity chapter in the draft plan, that includes actions items and performance measures in these areas.

*Our region deserves a growth alternative that strategically mitigates the negative impacts on vulnerable populations, improves health, and takes bold action to address and reduce the impacts of climate change.*

- While we prefer the Transit Focused Growth strategy, we want to emphasize that it still does not meet the emissions reductions demanded by science in order to limit our contributions to the climate crisis and the catastrophic impacts it will have on our region.

- The Washington Department of Ecology recommends revising Washington’s statutory greenhouse gas emissions limits to 80% below 1990 levels by 2050. Current statutory limits are a 50% reduction by 2050. PSRC’s own targets include an 80% reduction by 2050.
  - However, the even preferred alternative in the DEIS is extremely inadequate. According to the DEIS, Transit Focused Growth will result in 14.45 MMT of carbon-equivalent emissions per year in the Puget Sound. According to the [Deep Decarbonization Pathways Study](#), in order to achieve these targets, the energy-related emissions (electricity, building energy use, transportation, etc., what PSRC’s growth and transportation decisions help control) for the entire state must be 9.9 MMT of carbon. Currently, the Puget Sound is only responsible for 35% of Washington’s emissions, so the fact that the best scenario in terms of greenhouse gas emissions results in more energy-related emissions than the entire state can emit and still
achieve what science demands for us to limit warming is irresponsible.

- Given the importance of mitigating the climate crisis, PSRC should also be more transparent about the carbon reductions included in the EIS and the preferred alternative. Currently, the DEIS and the appendices do not outline the assumptions surrounding the projected greenhouse gas emissions and other pollutants. For example, it is impossible to determine if electrification is included in these projections. Per state law, the electricity grid must be carbon free by 2045. However, since the assumptions behind the carbon-equivalent emissions are not shared, it is difficult to evaluate the adequacy of this vision.

- The draft EIS recognizes that important habitat has declined since VISION 2040, but does not do enough to mitigate those impacts in VISION 2050. Specifically:
  - PSRC’s Open Space Conservation Plan notes that, between 2010 and 2015, there were 1,589 permitted housing units in aquatic system lands and 3,354 permitted housing units in natural lands;
  - PSRC recommends mitigation measures that their own report acknowledges suffer from “inadequate and unreliable funding.” Therefore the regional growth strategy must be the tool that steers development away from rural and unincorporated urban areas, minimizing habitat degradation rather than relying on mitigation measures that are unlikely to materialize;
  - The transit oriented growth strategy offers the strongest path to reduce the potential impacts of development at the edges of the Urban Growth Boundary while also encouraging stronger reductions in greenhouse gas emissions and air pollution, protecting wildlife and people from the twin threats of air pollution and climate change.

- Account for climate impacts.
  - We should ensure that any future growth is accounting for climate impacts and that we are not putting additional people or jobs in harm's way of climate related flooding, wildfires, or sea level change. We should also ensure our models account for population growth from climate refugees from the US and the world that come to the Puget Sound.

- Active transportation has a big part to play not only in climate change, but in health. A preferred alternative that lets more people live in places where they can regularly walk, bike or take transit will take cars off the road, while also providing numerous physical activity benefits.
  - Aerobic exercise is proven to be one of the greatest predictors of our physical health. According to a recent study in London, people who ride a bike are exposed to fewer dangerous fumes than those who travel by car. Per a new study of the genetics of physical activity, many of the most common chronic illnesses and conditions, including Type 2 diabetes, obesity, heart disease, osteoarthritis and others, are associated with being inactive.
  - Physically fit and healthy people are generally happier than their unfit, unhealthy counterparts. Depression, anxiety, and stress are generally lower in physically healthy people. Cycling and walking boost mental health.
  - A 2014 study shows that people that bike or walk are more likely to enjoy their trip than those that drive or take transit. Researchers were able to determine the average mood felt by people during different types of travel — and the demeanor of cyclists was significantly better than car drivers, passengers or public transit riders.
  - Research shows that physical activity is a way to achieve our need to be excited, lively, and adventurous.