



December 1, 2021

Michael McCrary, Planning Director  
Snohomish County Planning and Development Services  
3000 Rockefeller Ave  
Everett, WA 98201  
[2024Update@snoco.org](mailto:2024Update@snoco.org)

Dear Mr. McCrary:

The Snohomish County Transportation Coalition (Snotrac) is a state/federally-funded mobility management coalition that advocates for connecting people and communities in Snohomish County and beyond with safe, equitable, and accessible transportation. To do this, we convene public, nonprofit, and private transportation and human service agencies to identify mobility gaps and opportunities, especially for people with disabilities, older adults, youth, low income households, people of color, tribes, veterans, and people born in foreign countries or otherwise speak English as a second language.

Because the county comprehensive plan will significantly affect the lives of our priority populations, Snotrac provides this comment letter on the scoping of the environmental impact statement (EIS) for the 2024 major update.

A unifying issue across our priority populations is lower or no access to or ability to use a personal vehicle. As a result, our priority populations tend to be disproportionately impacted by poor land use patterns and transportation options that isolate them, that increase exposure to air pollutants and household housing and transportation costs, and that, in turn, decrease life expectancy and socio-economic mobility.

We have two primary comments:

1. Include the needs, mobility gaps, and mobility opportunities for priority populations.
2. Specify the population and employment growth target allocations to "RGCs/HCTAs" by city, consistent with VISION 2050's "65/75 Policy."<sup>1</sup>

### **Planning for the Mobility & Land Use Needs of Priority Populations**

The county comprehensive plan must be consistent with the region's plan, VISION 2050. VISION 2050's transportation policies incorporate the Regional Transportation Plan, colloquially referred to as Transportation 2040 but last updated in 2018 and is currently ongoing its own major update.

---

<sup>1</sup> "RGCs/HCTAs" is short for "regional growth centers and high capacity transit centers." The "65/75 Policy" refers to MPP-RGS-8 of [VISION 2050](#).

In turn, Transportation 2040 incorporates another plan called the “[Coordinated Mobility Plan](#),” formerly titled the “Coordinated Transit-Human Services Transportation Plan.” As the Transportation 2040 currently undergoes its major update, the Coordinated Mobility Plan is also currently undergoing its own major update.

The Coordinated Mobility Plan (Coordinated Transit-Human Services Transportation Plan), outlines how transit agencies, social service agencies, school districts, and other transportation providers can work together to improve regional mobility for individuals with special transportation needs throughout King, Kitsap, Pierce, and Snohomish counties.<sup>2</sup>

Pursuant to federal law, the Coordinated Mobility Plan must include:

- Inventory of current services.
- Emergency management planning for vulnerable populations.
- Common origins and destinations of individuals with special transportation needs.
- Technology.
- Assessment of transportation needs for individuals with special transportation needs.
- Identification of coordination actions to eliminate or reduce duplication in services and strategies for more efficient utilization of resources.
- Strategies to address identified gaps in services.
- The prioritization of implementation strategies.

We would encourage Snohomish County to include similar background information, analyses, policies, and strategies as part of the transportation element and other sections of the 2024 major update of the county comprehensive plan.

Snotrac has adopted a [2021-2025 Strategic Plan](#) with much of this information, analyses, and strategies that could be incorporated by reference into the county comprehensive plan, similar to how VISION 2050 and Transportation 2040 incorporate the region’s Coordinated Mobility Plan. Alternatively, Snotrac would be excited to work with county planning staff to ensure the mobility gaps and opportunities are well-addressed in the comprehensive plan update.

## Scoping the Growth Alternatives

For the EIS scoping of the comprehensive plan update, the major consideration is what growth alternatives to include in the study. Snotrac is especially focused on the county fulfilling its obligation in ensuring the region accomplishes the “65/75 Policy” of VISION 2050.<sup>3</sup> For each of the EIS growth alternatives, the EIS analysis should include how population and employment growth targets for regional growth centers (RGCs) and high-capacity transit areas (HCTAs) will be allocated to each of the cities.

---

<sup>2</sup> <https://www.psrc.org/our-work/regional-planning/regional-transportation-plan/coordinated-mobility-plan>

<sup>3</sup> The “65/75 Policy” refers to MPP-RGS-8 of [VISION 2050](#).

Three major issues loom for our region and county: (1) addressing climate change; (2) making our communities more equitable by improving accessibility and socio-economic mobility; and (3) capitalizing on multi-billion dollar investments in light rail and bus rapid transit. Each of these issues are unified by one major strategy: creating people-prioritized places while ending the development patterns of isolation. The population and employment growth targets should align with this strategy.

VISION 2050 sets a specific policy for targeting growth near existing and future high-capacity transit:

Attract 65% of the region's residential growth and 75% of the region's employment growth to the regional growth centers and high-capacity transit station areas to realize the multiple public benefits of compact growth around high-capacity transit investments. As jurisdictions plan for growth targets, focus development near high-capacity transit to achieve the regional goal.

([VISION 2050](#), MPP-RGS-8, page 43)

As required by MPP-RGS-8, now is the time for Snohomish County to allocate growth targets for RGCs/HCTAs. From hereon, our comment letter will refer to MPP-RGS-8 as the "65/75 Policy."

VISION 2050 defines "high-capacity transit station areas" as:

Areas within ½ a mile of existing or planned light rail and streetcar stations, commuter rail stations, ferry terminals, and within ¼ mile of all bus rapid transit stations. ([VISION 2050](#), Glossary of Terms, page 128)

Although bus rapid transit is not specifically defined in VISION 2050, Transportation 2040 describes "bus rapid transit" in this way:

Transportation 2040 considers bus rapid transit (BRT) as "Core" service. In current nationwide practice, the characteristics of BRT service vary. Generally for PSRC's regional planning, BRT service characteristics are 15 minute frequencies at least 18 hours daily. Since BRT service can go beyond typical core bus routes by including capital infrastructure designed to increase bus speed and provide passenger amenities along its route, Transportation 2040 defines BRT service with these additional parameters. Examples of supporting infrastructure include signal queue jumps or other transit signal priority treatments, wider stop spacing, curb bulb-outs at stops, enhanced passenger shelters at stops, and enhanced signage, wayfinding and real-time arrival and departure information. This regional-scale definition of BRT does not preclude additional features operators may choose to implement, such as dedicated bus vehicles with distinctive colors or graphics, or transit-only travel lanes on roadways.

([Transportation 2040](#), page 67, highlight added)

Areas within a quarter-mile of Community Transit's *Swift* line stations, Sound Transit's *Stride* line stations, and, perhaps, the stops of Everett Transit's Route 7 along north Broadway would be considered bus rapid transit station areas.

The 65/75 Policy of prioritizing growth in high-capacity transit station areas is a linchpin to many other priorities and policies of VISION 2050: climate change, equity, and capitalizing on light rail investments.

### ***Climate Change***

Addressing climate change is called out the strongest in VISION as a reason for prioritizing growth near high-capacity transit, stating, "Climate change is an urgent environmental, economic, and equity threat being addressed at all levels ... ." (page 5)

Both the region through the Puget Sound Clean Air Authority and the state legislature have set greenhouse gas reduction targets. In 2017, regional targets of 50% below 1990 levels by 2030 and 80% below 1990 levels by 2050 were set. In 2020, statewide targets of 70% below 1990 levels by 2040 and 95% below 1990 levels by 2050 were set.

Reducing greenhouse gas emissions from passenger vehicles is the most important action that Snohomish County can take. Of the four counties in the Central Puget Sound, Snohomish County has the highest percentage of GHG emissions from the transportation sector.<sup>4</sup> Fifty-one percent of the county's emissions are from transportation, which is 12 percentage points higher than any other county in the region. More than 90% of the county's transportation emissions are from on-road vehicles, of which passenger vehicles are 84%.

Widespread conversion to electric passenger vehicles will not likely be a viable solution to reducing greenhouse gas emissions from transportation. Studies increasingly show that the embedded greenhouse gas emissions, i.e. the emissions related to mining and manufacturing batteries and electric motors, are much higher than previously known with no clear technological solution to reducing these emissions.<sup>5</sup> Moreover, the mining of cobalt and other precious metals have a serious adverse impact on the environment.

Instead of relying on a technological revolution for cleaner electric vehicles to solve our climate crisis, we need to create complete, compact communities where it is easier for people to walk, roll, and bike. In short, we need to create people-prioritized places.

Luckily, major expansions of high-capacity transit are planned for Snohomish County. That's a major reason why the 65/75 Policy is the linchpin to VISION 2050's climate strategy:

In response to the central challenge of climate change and reducing greenhouse gas emissions, VISION 2050 builds on the state Growth Management Act framework and the regional emphasis of focusing growth into centers and near high-capacity transit options to create more sustainable communities and reduce emissions. ([VISION 2050](#), page 25)

---

<sup>4</sup> All greenhouse gas statistics are from the [Puget Sound Clean Air Agency Greenhouse Gas Emissions Inventory](#) (June 2017); see page 11 of the inventory.

<sup>5</sup> See, "[The tough calculus of emissions and the future of EVs From materials and batteries to manufacturing, calculating the real carbon cost of EVs is just getting started](#)," Mark Mills, Tech Crunch (Aug. 22, 2021).

## **Equity**

Simply reducing household costs is an important strategy for lifting people up out of poverty. Housing and transportation are the two highest household costs for a family. By switching from driving to public transit, a household saves more than \$11,000 per year.<sup>6</sup> Enabling more people to live within walking distance to regional transit systems helps ensure more families can have more money for other investments, such as education and healthcare.

Even more important, however, is increasing the number of jobs that are accessible to people within a short distance and commute time. A Harvard Study has found that “commuting time has emerged as the single strongest factor in the odds of escaping poverty.”<sup>7</sup> Put another way, it is the total number of available jobs within a given commute distance or time that is the most important factor.<sup>8</sup>

By building housing and jobs near high-capacity transit, people can both live closer to work and also have a fast, reliable transit option to work in another community in the county or region. With increased job opportunities (given a set commute time), there is greater ability for people to work up the socio-economic ladder.

Beyond household affordability and socio-economic mobility, there are other important equitable outcomes of building complete, compact communities connected by high-capacity transit, including building age-friendly and ability-friendly communities.

According to Disability Rights Washington, approximately 25% of In Washington State residents cannot drive due to age, ability, vehicle access, or other reasons. In Snohomish County, 8.2% of people under age 65 have a disability. There is another 15% of county residents who are older than 65, and the state Office of Financial Management projects the county’s 65+ population to increase to more than 22% by 2040. This increase in older adults is at a faster rate than the statewide average.

AARP has identified the shift away from suburban single-family home development toward complete, compact communities as a key strategy for supporting aging populations. As older adults find driving more difficult, single-family homes can result in social isolation within places that are unwalkable due to distance to destinations or lack of adequate sidewalks and curb ramps. Social isolation is considered one of the social determinants of health, posing the same risk to one’s health as smoking up to 15 cigarettes per day.<sup>9</sup>

By focusing new development in regional growth centers and near high-capacity transit, we can ensure more people with disabilities and older adults will have shorter walks and rolls to their destinations without having to rely on driving, paratransit, or community vans. This will empower people with greater freedom in their lives, giving them greater dignity.

---

<sup>6</sup> The American Public Transportation Association publishes a monthly “Transit Savings Report” that calculates annualized savings in the 20 most populous regions of the country based on the latest gas prices.

<sup>7</sup> “[Transportation Emerges as Crucial to Escaping Poverty](#),” Mikayla Bouchard, New York Times (May 7, 2015).

<sup>8</sup> For more information about this research, learn more at [Opportunity Insights](#) at Harvard University.

<sup>9</sup> Learn more at [AARP’s Livable Communities program webpage](#).

### ***Capitalizing on the HCT Investments***

Building light rail and bus rapid transit is not cheap. To some extent, the financial success of these new transit investments require sufficient ridership. It is far more cost-effective and land-efficient for ridership to be based on people living near the stations and walking to the stations rather than living farther away and driving to park at a \$100 million parking garage.

Even more important than farebox recovery, prioritizing growth near transit helps ensure there are more people living within the transit service areas who pay the sales and property taxes necessary to support the transit systems.

In 2015, PSRC published a literature review on the necessary density levels to make high-capacity transit financially viable.<sup>10</sup> The reviewed literature recommended: (1) emphasizing significant job growth nearest to the stations as employment levels was the biggest determinant of ridership, and (2) ensuring at least 30-50 residents per gross acre within a half-mile. In addition, low income individuals were found to drive 50% less than median income individuals, and thus affordable housing options should be prioritized near transit.

To ensure Lynnwood/Everett Link and *Swift* and *Stride* lines are financially successful, Snohomish County should ensure a greater percentage of people will live and work near the transit stations.

### ***Allocating RGC/HCTA Growth in Snohomish County***

Implementing VISION 2050's 65/75 Policy is the single-most important strategy to fighting climate change, building equitable communities, and ensuring the financial viability of transit investments.

The Snohomish County Tomorrow (STC) Steering Committee will soon make a formal recommendation for allocating population and employment growth targets to the cities and sub-geographies, and may have already taken action by the time this letter is read. STC's recommendation will become the default preferred alternative for Snohomish County's growth alternative planning.

Despite VISION 2050's 65/75 Policy, SCT has not yet assigned growth targets for the RGCs/HCTAs across the county. This raises a serious concern that Snohomish County may not do its part in accomplishing the regional RGC/HCTA growth target. Another concern is that some cities may end-up bearing an impossible burden of ensuring all of their allocated growth is within their RGCs/HCTAs.

Including this analysis within the EIS scope is critical as the distribution of housing and jobs to transit-rich areas versus less dense areas will likely have a significant impact on greenhouse gas emissions, stormwater pollution, and environmental justice outcomes.

Ultimately, this is about how many people will or won't live in a complete, compact communities. Communities where someone can grow old and not feel socially isolated. Communities where people with disabilities can easily get around. Communities that foster upward socio-economic mobility. Communities that help address climate change. Communities that help cover the costs of our transportation infrastructure investments.

---

<sup>10</sup> [Transit-Supportive Densities and Land Uses: A PSRC Guidance Paper](#), PSRC (Feb. 2015).

Even if 60-65% of future county residents live within RGCs/HCTAs, that'll mean that 35-40% of residents will not live within places that have great transit, where walking and rolling to destinations is easy, where homes are close to jobs. These people will live in expensive places that are less affordable and do more damage to the climate. They will pay less into making sure our transit systems are financially strong.

For this reason, Snotrac encourages Snohomish County to include the RGC/HCTA growth target allocations within the EIS.

Thank you for the opportunity to comment on the scoping of the EIS for the 2024 major update to the Snohomish County comprehensive plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brock", with a stylized flourish at the end.

Brock Howell, Director  
Snohomish County Transportation Coalition  
[brock@gosnotrac.org](mailto:brock@gosnotrac.org)  
206-856-4788