



December 1, 2021

Brett Gailey, Chair

% Cynthia Pruitt, SCT Coordinator

**Snohomish County Tomorrow (SCT) Steering Committee**

Snohomish County Administration Building

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Dear Chair Gailey and members of the SCT Steering Committee:

You are about to complete the most foundational element for comprehensive planning in Washington State: allocating the county's population and employment growth targets to its cities and sub-geographies. Because this step is so critical to the upcoming major updates to the county and city comprehensive plans, you need to make sure to get the targets right for the climate, for equity, and for ensuring success of our transit investments. For this reason, the Snohomish County Transportation Coalition (Snotrac) recommends that the SCT show its math.

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.

## **Why Growth Allocations Matter**

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

Looking to the future, three major issues loom: (1) addressing climate change; (2) making our communities more equitable by improving 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, highlights added)

As required by MPP-RGS-8, now is the time for Snohomish County to allocate growth targets within regional growth centers (RGCs) and high-capacity transit station areas (HTCAs). From hereon, this 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>1</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>2</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)

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<sup>1</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>2</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>3</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>4</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>5</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>6</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.

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<sup>3</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>4</sup> “[Transportation Emerges as Crucial to Escaping Poverty](#),” Mikayla Bouchard, New York Times (May 7, 2015).

<sup>5</sup> For more information about this research, learn more at [Opportunity Insights](#) at Harvard University.

<sup>6</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>7</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, SCT should ensure a greater percentage of people will live and work near the transit stations.

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<sup>7</sup> [Transit-Supportive Densities and Land Uses: A PSRC Guidance Paper](#), PSRC (Feb. 2015).

## **Allocating 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 SCT Planning Advisory Council (PAC) states that it has taken into account several factors for allocating growth across the county:

1. Current population
2. Current employment
3. Amount of employment change over the past decade
4. Employment capacity associated with pending development in 2021 BLR
5. Number of light rail stations
6. Number of high-capacity transit stations (non-light rail)
7. Number of manufacturing/industrial centers.

The SCT PAC says it has averaged these factors to come up with its growth targets for each city/geography. However, it has not otherwise shown the math behind the allocations. In order to know whether the 65/75 Policy could be reasonably expected to be achieved, the math needs to be shown.

### ***Planning for the RGC/HCTA growth targets in Snohomish County***

One major unknown is how much of the region's growth in RGCs/HCTAs should happen in Snohomish County versus the other three counties. King County is likely to have the most significant growth in its RGCs/HCTAs, which would mean that Snohomish County would not need as much growth in its HCTAs for the region as a whole to achieve the 65/75 Policy.

VISION 2050 did not create growth targets for the 65/75 Policy for each county. This means the SCT must make its own assumptions about how Snohomish County will contribute to the regional 65/75 Policy.

One approach would be to say each county is expected to achieve the 65/75 Policy. Based on this 65/75 approach, SCT would need to plan for 229,450 more residents and 135,000 more jobs in RGCs/HCTAs (using VISION 2050 growth targets with the 2017 baseline). Based on the SCT PAC's growth allocation recommendations, that would mean that the cities and areas designated as Metropolitan, Core, or HCT Communities would need to ensure 88.2% of their new residents and 90.4% of their new workers would live within their RGCs/HCTAs.

Another approach would be to say Snohomish County has 10.58% of the region's total acreage of RGCs/HCTAs, so it should plan for 10.58% of the region's population growth targets for these areas. Based on this acreage approach, SCT would need to plan for 120,769 more residents and 91,894 more jobs in RGCs/HCTAs. Based on the SCT PAC's recommendations, that would mean that the cities and areas designated as Metropolitan, Core, or HCT Communities would need to ensure 46.4% of their new residents and 61.5% of their new workers would live within their RGCs/HCTAs.

Here's a table outlining the math.

|   | Region    | SnoCo<br>Countywide | SnoCo Cities<br>w/o HCTAs      | SnoCo Cities w/<br>RGCs/HCTAs |
|---|-----------|---------------------|--------------------------------|-------------------------------|
| <b>Acres in RGCs/HCTAs</b>                        | 72,849    | 7,708               | 0                              | 7,708                         |
| County's Percentage of Region's RGCs/HCTAs Acres  |           | 10.58%              |                                | 10.58%                        |
| <b>2044 Population Growth Target</b>              | 1,756,000 | 353,000             | 48,249                         | 260,104                       |
| <b><u>Pop. Target for RGCs/HCTAs</u></b>          |           |                     | <u>% Living in RGCs/HCTAs</u>  |                               |
| If 65% of county residents live within RGCs/HCTAs | 1,141,400 | 229,450             | 0%                             | <b>88.2%</b>                  |
| If RGC/HCTA growth is split by county acreage     | n/a       | 120,769             | 0%                             | <b>46.4%</b>                  |
| <b>2044 Employment Growth Target</b>              | 1,158,000 | 180,000             | 22,480                         | 149,337                       |
| <b><u>Job Target for RGCs/HCTAs</u></b>           |           |                     | <u>% Working in RGCs/HCTAs</u> |                               |
| If 65% of county residents work within RGCs/HCTAs | 868,500   | 135,000             | 0%                             | <b>90.4%</b>                  |
| If RGC/HCTA growth is split by county acreage     | n/a       | 91,894              | 0%                             | <b>61.5%</b>                  |

*Note: This chart uses the VISION 2050 population and employment growth numbers, which have a 2017 baseline. This allows for county-to-county comparisons and for accurate representation of the expected ratio of RGC/HCTA growth targets to overall population/employment growth targets. The SCT PAC's growth targets use a 2020 baseline; the respective population growth target is 308,352 and employment growth target is 171,818.*

However, the acreage ratio approach would make it impossible for King County to meet its RGC/HCTA targets. That obviously makes the acreage approach a nonstarter. Here's the analysis for all four counties:

|  | King    |             | SnoCo   |     | Kitsap |     | Pierce  |             |
|--|---------|-------------|---------|-----|--------|-----|---------|-------------|
| <b>Acres in RGCs/HCTAs</b>   | 51,615  |             | 7,708   |     | 2,791  |     | 10,735  |             |
| County's Percentage of Region's RGCs/HCTAs Acres   | 70.85%  |             | 10.58%  |     | 3.83%  |     | 14.74%  |             |
| <b>2044 Population Growth Target</b>   | 724,000 |             | 308,352 |     | 80,000 |     | 302,000 |             |
| <b><u>Pop. Target for RGCs/HCTAs</u></b>   |         |             |         |     |        |     |         |             |
| If 65% of county residents live within RGCs/HCTAs  | 470,600 | 65%         | 200,429 | 65% | 52,000 | 65% | 196,300 | 65%         |
| If RGC/HCTA growth is split by county acreage  | 808,705 | <b>112%</b> | 120,769 | 39% | 43,729 | 55% | 168,196 | 56%         |
| If 90% of King County's population growth is in RGCs/HCTAs, and the remainder is allocated by acreage  | 651,597 | 90%         | 177,800 | 58% | 64,380 | 80% | 247,623 | 82%         |
| <b>2044 Employment Growth Target</b>   | 547,000 |             | 157,000 |     | 45,000 |     | 157,000 |             |
| <b><u>Job Target for RGCs/HCTAs</u></b>  |         |             |         |     |        |     |         |             |
| If 65% of county residents work within RGCs/HCTAs  | 410,250 | 75%         | 117,750 | 75% | 33,750 | 75% | 117,750 | 75%         |
| If RGC/HCTA growth is split by county acreage  | 615,350 | <b>113%</b> | 91,894  | 59% | 33,274 | 73% | 127,982 | 82%         |
| If 100% of King County's employment growth is in RGCs/HCTAs, and the remainder is allocated by acreage | 546,975 | 100%        | 116,714 | 74% | 42,261 | 94% | 162,549 | <b>104%</b> |

*Note: The percentages are the counties' percentages of growth occurring in the RGCs/HCTAs relative to their overall growth targets.*

To make the acreage approach work, King County's excess RGC/HCTA growth would need to be redistributed to Kitsap, Pierce, and Snohomish Counties. It should also be anticipated that not 100% of

King County's growth will be in its RGCs/HCTAs. If it's expected that 90% of King County's population growth would occur within its RGCs/HCTAs, then there would be 157,108 people that would need to be accommodated within the RGCs/HCTAs of Kitsap, Pierce, and Snohomish Counties. Using an acreage approach to proportionately reallocate King County's excess growth to the three counties, Snohomish County would need to ensure 58% of its population growth will live in its RGCs/HCTAs.

However, making the acreage approach work for employment growth is nearly impossible. Even if King County's employment growth within RGCs/HCTAs was capped at 100% of their overall growth target, a proportionate reallocation (based on RGC/HCTA acreage) of King County's RGC/HCTA growth to the other three counties would result in Pierce County in excess of its overall employment growth target. In addition, Snohomish County's employment growth target for its RGCs/HCTAs would be nearly identical to the region-wide 65/75 Policy: 74%.

Based on this analysis, it's clear that **SCT should be planning for 60-65% of its population growth and 70-75% of its employment growth to occur within its RGCs/HCTAs.** If Snohomish County jurisdictions do this, then the county will be doing its part to achieve the regional 65/75 Policy.

### ***Meeting the RGC/HCTA targets within cities***

Whatever approach is used, we are concerned that the burden of reaching the targets may be exceptionally high for communities with the highest levels of high-capacity transit. This perverse outcome is primarily due to a possible underallocation of overall population growth to transit-strong communities relative to transit-light communities.

For example, while Arlington is an HCT Community, its only station will be the *Swift* Gold line at Smokey Point. The development opportunities within a quarter-mile of the Smokey Point Transit Center are limited, especially relative to the total geographic size of the city — the Smokey Point HCTA is approximately 2% of the city's total geographic area. As a result, it's highly unlikely that Arlington will be able to put 46.4% of its population growth and 61.5% of its employment growth within its HCTA, let alone the higher targets of 77.1% and 86.3%.

Cities like Bothell, Edmonds, Everett, Mountlake Terrace, and Lynnwood will be forced to make up the difference in their communities. It would be more reasonable to allocate more growth to the Metropolitan and Core Cities so that they can have a more reasonable balance between growth within and outside of their RGCs/HCTAs.

### ***Accounting for MICs in light of the 65/75 Policy***

Another challenge is how to allocate employment growth in light of the 65/75 Policy. The 65/75 Policy does not include regional manufacturing/industrial centers. Unless the future growth is within a half-mile of the future SW Everett Industrial Center light rail station or within a quarter-mile of the future *Swift* Gold Line terminus at Smokey Point, then the future jobs in those areas will not count toward achieving the 65/75 Policy. This makes sense as the point of the 65/75 Policy is to encourage commuting patterns where people can walk, bike, and take transit from home to work; unless jobs within a MIC are walkable and have good transit access, increasing the number of jobs in these areas are unlikely to help address climate change.



These challenges — how to ensure the 65/75 Policy is met between the cities and how to account for MIC employment growth in light of the 65/75 Policy — are why it is so important for the SCT to show its math in allocating the growth targets.

As already highlighted, the importance isn't just achieving mathematical precision. This is about how many people will and how many people will not live in a complete, compact community. 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.

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.

Snotrac encourages SCT to do even more than show its math. More should be done to improve the lives of all residents by continuing to reform development regulations and transportation investments in order to support even more housing and jobs within the RGCs/HCTAs. SCT can play a leading role in encouraging its jurisdictions to do this hard work.

Thank you for the opportunity to comment on the 2044 population growth target allocations.

Sincerely,

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

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