



June 1, 2017

Dear Chair Mello, Vice Chair Margeson, and members of the Growth Management Policy Board,

Thank you for taking the time to review and shape the Regional Centers Framework (RCF) proposal. Together, we are a growing group of organizations that advocates for healthy, sustainable, and affordable transit-oriented communities that work for everyone. Our coalition represents environmental, land use, transportation, and affordable housing sectors, as well as the interests of low-wage workers, communities of color, low-income households, and people who use all modes of transportation, underscoring the truly regional and intersectional benefits of a good framework for growth.

We are very excited that PSRC, its members, and stakeholders are undertaking a review of the RCF as we believe it is an important tool for ensuring growth and development in line with the goals of VISION 2040. As the Growth Management Policy Board considers an update to the Framework, we offer the following comments:

- **We support the general direction of the framework proposal developed by the stakeholder group.** We support a framework that recognizes and helps places develop into centers that are vibrant, walkable, growing areas of all sizes that provide access to jobs, affordable housing, education, critical services, and recreation through affordable and sustainable transportation options. Although we believe improvements can be made, we believe that the proposal before you is developed based on extensive research by staff, and was crafted so as to respond to the concerns originally raised by the GMPB about the current Centers designations criteria and process.

The board directed staff and a working group to revisit the Centers Framework after research showed that existing centers were performing differently, and that the criteria for designation was inconsistent and failed to recognize the variety of scales of centers in the region. To that end, we hope that PSRC can adopt a new, more consistent and comprehensive Centers Framework that recognizes and promotes the diversity of jurisdictions, while setting upfront planning criteria and thresholds that help us meet our jointly adopted goals and vision

- **We strongly recommend that GMPB incorporate the recommendations from the [RCF Equity Supplement](#).** We view PSRC's efforts to update the RCF as an opportunity to make our regional approach to growth and development more equitable. The Puget Sound region is growing at a historic pace, and some of the highest growth rates are among immigrants, refugees and communities of color. The infrastructure and land use decisions we make now, and the groundwork we lay for future decisions, must be designed to ensure all communities benefit from and are protected from the harm of regional growth and economic development. As we have learned from assessing the negative environmental impacts of the growing displacement and suburbanization of low-income communities of color, failing to adequately and comprehensively prioritize equity up front will in turn undermine other objectives, including public health, density, and environmental goals.

- In order to develop equitable communities, centers should have housing policies that support housing options at all income levels as well as affordable commercial retail space to accommodate small businesses.
 - In addition, centers should enact anti-displacement policies for commercial and cultural facilities.
 - We would like to see a framework that supports jurisdictions as they consider and plan for the community and environmental health impacts of their planned growth.
 - We hope that PSRC can serve the region as a resource and provide technical assistance to jurisdictions that currently lack capacity or expertise to implement the aforementioned tools and programs.
 - Although we support the general direction of the RCF proposal, an equity analysis would help us understand the impacts of different alternatives and areas for improvement.
- **We support a framework with a strong focus on sustainable, affordable, and healthy transportation options.**
 - The emphasis on high-capacity transit within and between Centers is an important step in the recognition that transit plays in creating safe and affordable access to jobs, education, and services.
 - As we work to create and improve easy and safe bike and pedestrian networks, we should focus on connections between and within Centers.
- **We support the development of performance measures and reporting processes to ensure the new framework is supporting Vision 2040, and that designated Centers continue to meet objectives:**
 - How does a framework support health, mobility, and access to opportunity for people of all races, incomes, and special needs?
 - How are our transportation and land use investments reducing pollution, GHGs, and stormwater?
 - Are we making investments that make the most efficient use of land and existing infrastructure?
- **As currently presented, we prefer Regional Growth Center Alternative A, and minimum eligibility for Countywide Centers.** Together, these options set clear and consistent thresholds to help us meet growth objectives. We look forward to further refining and improving these alternatives.
- **Questions and comments for further discussion:**
 - While we support the strong emphasis on existing transit and walkable networks in centers, we would like to better understand how we can incentivize and support smaller jurisdictions in planning for and making these same investments to ensure that all communities, especially low-income communities, have access to affordable, healthy, and sustainable transportation options.
 - In order to obtain authentic, reliable information with respect to transportation system utilization, PSRC should support resourced engagement on the part of community-based organizations by compensating them for their time, as they would any other consultant.

We absolutely understand the concern about the perceived impacts to funding by changing the structure of the Framework; we also need to use our limited resources in an efficient manner that supports healthy

and inclusive communities. The RCF is about planning efficiently and sustainably, and has a far more expansive and important role than simply funding eligibility. As a region, we are only as strong as our collective cities, towns, and neighborhoods, which is why we hold ourselves to such important planning standards.

We look forward to working with PSRC staff and board on this framework going forward. Thank you.

Sincerely,



Shefali Ranganathan
Executive Director
Transportation Choices Coalition



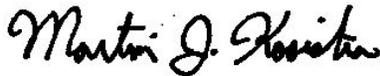
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