

September 7, 2017

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

Thank you for continuing to take the time to review and shape the Regional Centers Framework (RCF) proposal, as we believe it is an important tool for ensuring growth and development in line with the goals of VISION 2040. VISION is a regional strategy for accommodating growth by focusing new housing, jobs and services within the region's urban growth areas and especially within regional growth centers. Centers, at the heart of this plan, provide services and resources to everyone in the region, regardless of where they live, and should be synonymous with compact, inclusive development in order to deliver infrastructure more efficiently.

Therefore, the RCF should be designed to help us reach the outcomes and goals that VISION is built on, planning and regional investment based on needs rather than politics. Given our limited resources, we need to focus on solving the transportation issues of Puget Sound today in the most efficient manner.

We are a group of organizations that advocates for healthy, sustainable, and affordable transit-oriented communities that work for everyone. As the Growth Management Policy Board considers an update to the Framework, we offer the following comments:

Overall objectives

- **Create a strong, consistent, comprehensive framework** with clear requirements and outcomes.
- Although centers designations may tie into funding decisions later, Centers criteria should be set in order to achieve performance and planning goals, rather than letting the possibility of funding drive thresholds.
- **Expand the notion of performance beyond “hitting growth targets”** - PSRC should measure how all types of Centers help the region meet the goals of safety, public health, GHG reductions, and inclusivity, and more, and then develop Centers framework to help meet desired regional outcomes.
- **Social equity is a key component of inclusive planning.** We strongly recommend adopting the social equity proposal from the Regional Staff Committee, with a particular commitment to identify performance targets, methods for accountability, standards for analysis, and opportunities for PSRC to provide incentives and technical or financial assistance for jurisdictions with limited capacity. Given the additional emphasis on high-capacity transit in centers, it is particularly important to analyze and mitigate displacement risk of residents, small businesses, and cultural anchors as land values and connections to opportunity increase.
- **Accountability is key - for both new and existing centers.**
 - Subarea planning and analysis requirements should be provided upfront to determine eligibility (rather than done once designated).
 - Performance should be monitored on an ongoing basis.
 - The eligibility of Centers that do not perform should be re-evaluated, and should develop a plan for compliance, or face de-designation.

- **Identify ways that PSRC can support and incentivize jurisdictions to achieve outcomes,** perhaps through planning grants or technical assistance.

Regional Growth Centers

- We support a RGC framework that has clear and consistent thresholds and requirements for different scales of Centers (rather than a checklist of options approach).
 - Different “categories” of Centers with different thresholds holds help support the different and relative roles that different Centers play in our region.
- We support the increased emphasis on transit connections to, within, and between Centers:
 - Existing or planned HCT or similar frequent service
 - Evidence the area serves as a major transit hub
 - Robust access to transit (local and regional)
- Centers should show the following existing conditions:
 - Housing and job density
 - Pedestrian infrastructure and supportive street patterns
 - Bicycle infrastructure
- Centers should show evidence of existing regional role, rather than the *possibility* of a future regional role. If possible, PSRC should create incentives and assistance for those poised to grow into regional centers to grow in a way consistent with VISION.

Countywide Centers

- There should be better consistency across jurisdictions for countywide centers requirements.
- Eligibility requirements and planning standards should mirror the criteria areas - if not the same thresholds - as regional centers: Baseline multimodal infrastructure and service, compact, mixed land use, and social equity.
- The current proposed threshold (10 AU/acre) seems very low considering that the overall average density across all jurisdictions is 8 AU/acre.

Manufacturing/Industrial Centers

- Centers designations should be based on current employment levels and land use, not *potential*. (Local comprehensive plans are the best mechanism for protecting industrial lands.)
- We support consideration of *types* of jobs, i.e. family wage/living wage.
- MICs should have Transportation Demand Management strategies in place.
- MICs should have Environmental Justice analyses and mitigation strategies in place.

Military

- We recognize that military installations often are regionally significant employers and can have an impact on the region.
 - However, we do not believe they should compete for regional funds as they don't create consistency across centers requirements.
 - Centers designation indicate baseline multimodal infrastructure and service as well as compact land use, while military installations can be sprawling and their land use isn't controlled by the local jurisdictions.

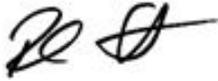
Thank you,



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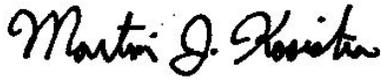
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