

## Comments to the Centers Stakeholder Working Group

---

The Stakeholder Working Group received several letters during the course of its review of the centers framework and recommended forwarding this correspondence to the Growth Management Policy Board. Please note that some specific comments or recommendations may have been addressed through subsequent discussion by the working group.

Letter	Date	Page
South Sound Military and Communities Partnership	September 27, 2016	2
Department of Navy to Snohomish County	November 15, 2016	4
Department of Navy to Kitsap County	November 14, 2016	6
Kitsap County Commissioners	December 9, 2016	9
City of University Place	December 16, 2016	13
City of Bremerton	December 20, 2016	15
Puget Sound Sage	December 20, 2016	17
Transportation Choices Coalition, Puget Sound Sage, and Futurewise	December 26, 2016	20
Cities of Arlington and Marysville	January 12, 2017	23



# SOUTH SOUND MILITARY & COMMUNITIES PARTNERSHIP

6000 Main St SW, Lakewood, WA 98499 | [www.ssmcp.org](http://www.ssmcp.org)

**SSMCP Steering Committee:**

- City of Lakewood
- City of Lacey
- Pierce County
- Joint Base Lewis-McChord
- Nisqually Tribe
- Thurston County
- Thurston Regional Planning Council
- City of DuPont
- City of Tacoma
- City of Olympia
- City of University Place
- City of Yelm
- Tacoma-Pierce County Health Department
- Tacoma-Pierce County Chamber of Commerce
- United Way-Pierce County
- Washington State Department of Transportation
- Washington State Military Department

September 27, 2016

**SUBJECT: PSRC Regional Centers Framework - Military Installations**

To state the obvious, all military installations are not created equal. Acknowledging JBLM and its surrounding communities in the PSRC regional centers framework only benefits the region and Washington State, failing to do so could be costly.

Typically, communities court business to relocate or stay within their jurisdictions. JBLM is unique due to its relations with its neighbors, its location and proximity to the Pacific as well as the co-location of Army and Air Force forces here. JBLM is already playing a regional role in attracting and accommodating a significant share of the region's population and employment growth. JBLM's economic impact on the State (#2 employer in WA) and the Puget Sound region (#1 employer in Pierce County) should receive special consideration in the "centers" deliberations.

JBLM is invested in more than 17 communities around the base. Strategic messaging should highlight community support for JBLM if for no other reason than to enhance JBLM's stature among its peers and enhance DOD mission accomplishment. The South Sound's recognition as a Great American Defense Community this year is one example of national acknowledgement. In addition to the economic value of JBLM, its employees create demands on community-based social systems such as: housing, social services, public education, healthcare, transportation, and business development. In the specific case of JBLM, SSMCP advocates for recognition of a *JBLM-communities cluster* as a regional center.

Dissenting opinions regarding military installation recognition as a "regional center" seem founded on the notion that PSRC lacks control and authority over federal lands so it should not prioritize military installations with "center" recognition. Even after this consternation, PSRC should consider JBLM and its local communities into the calculus of a "centers" decision because control and authority does exist for surrounding communities and in a passive way over JBLM lands.

JBLM resides on Pierce County lands. To paraphrase the legal relationship, there is a reversionary clause that states, in effect, should the federal government vacate JBLM lands those lands would revert to Pierce County. Consider the impact on the region should JBLM close. Several billion dollars of economic activity would cease. Tens of thousands would leave the region. Hundreds of businesses in local communities would close. Funding for a number of social services would dry up. The region should be doing everything it can to retain JBLM and expand its mission.

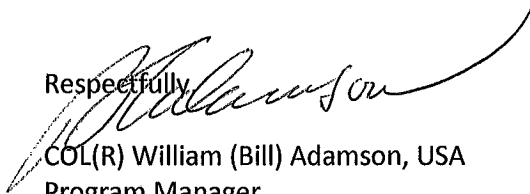
Local communities and regional boards certainly influence congressional deliberations on the value of military installations throughout the U.S. Some areas of the country go out of their way to tout the importance of military installations to their economies. Our region will benefit by doing the same.

JBLM is an interdependent economic component of the South Puget Sound, and even though it may consist of federal property it is intrinsically linked to the communities and commerce of the region. The local jurisdictions surrounding JBLM have a symbiotic, collaborative relationship with JBLM. Either would struggle without the other. Well over 70% and tens of thousands of JBLM employees, live off-base in the surrounding communities.

Some cities would not exist were it not for the presence of JBLM and its workforce. For example, Lakewood and DuPont did not incorporate as cities until decades after JBLM came into existence. Lakewood's Cloverpark School District runs all the on-base schools. The cumulative support local communities provide JBLM is critical to its military mission as a power projection platform. This support extends well beyond the gray area on a map representative of the fence line of the installation. Tacoma (a current PSRC metro center) owes its stature in no small part to the presence of JBLM and the defense dollars and contracting opportunities it affords.

Regional infrastructure enable JBLM's power projection mission: railways, road networks (extending to Yakima), airfields, and deep water sea ports from Seattle, Tacoma, and Olympia. All are strategic enablers supporting the National Security Strategy. PSRC deliberations should factor in JBLM as a strategic asset for the US. JBLM's strategic location coupled with other regional military assets not only here in the Puget Sound region such as Naval Base Kitsap, Bangor Submarine Base and Naval Station Everett, but also the Yakima Training area and Fairchild AFB in Spokane makes our region and our state a place of continued importance; a place that provides multi-agency coordination and economies of scale that cannot be found elsewhere in the United States.

Respectfully



COL(R) William (Bill) Adamson, USA  
Program Manager  
South Sound Military & Communities Partnership  
badamson@cityoflakewood.us



DEPARTMENT OF THE NAVY

NAVAL STATION EVERETT  
2000 WEST MARINE VIEW DRIVE  
EVERETT, WA 98207-5001

IN REPLY REFER TO:

5310

N4

November 15, 2016

Ms. Barb Mock, Director  
Snohomish County Planning and Development Services  
3000 Rockefeller Ave., M/S 604  
Everett, WA 98201

Dear Ms. Mock:

SUBJECT: PUGET SOUND REGIONAL COUNCIL CENTERS FRAMEWORK UPDATE  
PROJECT

Naval Station Everett (NSE) would like to thank you for the ongoing coordination and support during the Puget Sound Regional Council (PSRC) Centers Framework project. The County has worked to ensure the installation is accounted for when identifying regional centers and to ensure our employment numbers, economic impact, traffic demands, and other local land use planning needs are addressed in the Regional and local planning policies. The Navy needs communities with affordable housing, good transportation networks and services just like any other large employer. Ensuring local jurisdictions can account for the military provides additional visibility and funding for Marysville, City of Everett, and overall Snohomish County.

As we stated at the PSRC Centers Military Discussion on 21 SEPT, the military impacts the local communities' housing, transportation, and economy. The addition of four new destroyers will bring an additional \$43 million to the local and regional economy, as well as over 1,200 sailors and their families.

Regarding regional centers designations, it is important that jurisdictions account for military installations when the installations are surrounded by or in close proximity to the center as is the case with Marysville in Snohomish County. Accounting for the military population that directly impacts the community including the infrastructure provides opportunities for the local jurisdictions to improve the current infrastructure to better serve the population that resides in it. We would like PSRC and the local jurisdictions to recognize the importance of transportation and land use planning to ensure

5310

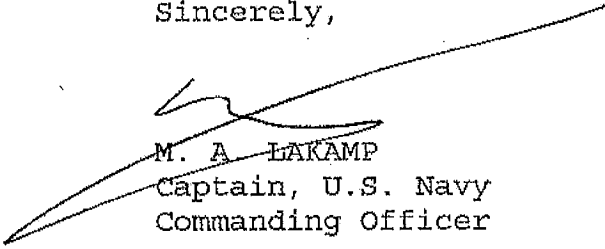
N4

November 15, 2016

the readiness and sustainment of our missions at NSE. This in turn supports the very large employment and economic benefit the Navy payroll and contracting plays in the local, regional and state economy.

I am confident we can continue to work together toward long range compatible land use and transportation planning. We believe the efforts of PSRC and the local jurisdictions to account for military installations in the planning process is an important step forward. Thank you for the continued consideration of Naval Station Everett's operations throughout the PSRC Centers Framework Update.

Sincerely,



M. A. LAKAMP  
Captain, U.S. Navy  
Commanding Officer

Copy to: Mr. Dave Koenig City of Marysville  
Mr. Steve Toy Snohomish County  
Mr. Steve Thompson Snohomish County



DEPARTMENT OF THE NAVY  
NAVAL BASE KITSAP  
120 SOUTH DEWEY STREET  
BREMERTON, WA 98314-5020

11011  
Ser N4/ 02088  
14 Nov 16

Louisa Garbo  
Director, Kitsap County Department of Community Development  
614 Division St., MS-36  
Port Orchard, WA 98366

Dear Ms. Garbo:

SUBJECT: PUGET SOUND REGIONAL COUNCIL (PSRC) REGIONAL CENTERS  
FRAMEWORK UPDATE PROJECT

Thank you for coordinating with us on the Centers Framework to ensure the military installations are accounted for when identifying regional centers and to ensure our employment numbers, traffic demands, and other local land use planning needs are addressed in the Regional and local planning policies. The Navy needs communities with affordable housing, good transportation networks, and services just like any other large employer. Ensuring local jurisdictions can account for the military can provide additional visibility and funding for the communities including the City of Bremerton and Kitsap County. As we stated at the PSRC Centers Military Discussion on 21 September 2016, the military impacts the local communities housing, transportation, and economy. The military cannot fund the local community improvements needed to sustain our growing population that lives and works in the jurisdictions. We recognize that our rapid changes in employment numbers and populations can put stresses on the planning process and we appreciate the excellent work the City of Bremerton has done to address these changes and continued growth.

Regarding regional centers designations, it is important that jurisdictions account for military installations when the installations are surrounded by or in close proximity to the center. Accounting for the military population that directly impacts the community including the infrastructure provides opportunities for the local jurisdictions to improve the current infrastructure to better serve the population that resides in it. Examples of military installations with large populations that live, work, and shop in the community include Silverdale where Naval Base Kitsap (NBK) - Bangor is located and the City of Bremerton where NBK - Bremerton is located. We have attached

SUBJECT: PUGET SOUND REGIONAL COUNCIL REGIONAL CENTERS  
FRAMEWORK UPDATE PROJECT

a map depicting the jurisdiction in relation to NBK. We would like PSRC and the local jurisdictions to recognize the importance of the transportation and land use planning to ensure the readiness and sustainment of our missions at NBK which in turn supports the very large employment and economic benefit Navy payroll and contracting plays in the local, regional, and state economy.

Together, I am confident we can continue to work toward long-range compatible land use and transportation planning. We believe the efforts of PSRC and the local jurisdictions to account for military installations in the planning process is an important step forward. Thank you for the continued consideration of NBK's operations throughout the PSRC Centers Framework Update.

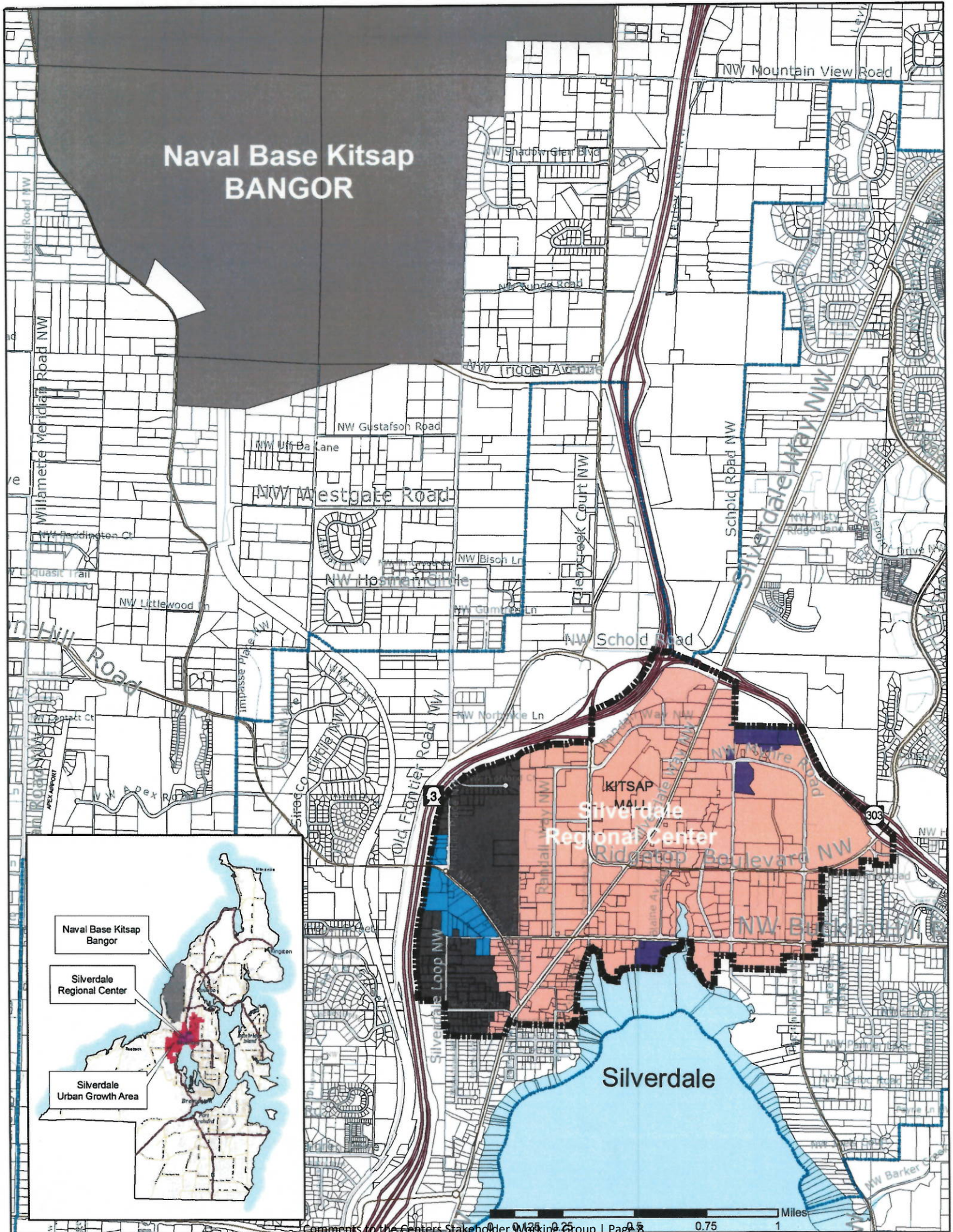
Sincerely,



E. A. SCHRADER  
Captain, U. S. Navy  
Commanding Officer

Enclosure: 1. Map





Naval Base Kitsap  
BANGOR

NW Mountain View Road

Williamette Meridian Road NW

Hill Road

NW Westgate Road

Silverdale  
Regional Center

Silverdale

303

- Naval Base Kitsap Bangor
- Silverdale Regional Center
- Silverdale Urban Growth Area





# KITSAP COUNTY BOARD OF COMMISSIONERS

*Efficient, accessible and effective county services*

December 5, 2016

Robert Gelder  
DISTRICT 1

Charlotte Garrido  
DISTRICT 2

Edward E. Wolfe  
DISTRICT 3

Puget Sound Regional Council  
Centers Framework Working Group  
ATTN: Liz Underwood- Bultmann  
1011 Western Ave, Suite 500  
Seattle, WA 98104

Dear Liz Underwood-Bultmann:

Thank you for the opportunity to participate in the Puget Sound Regional Council's (PSRC) Regional Centers Framework discussion. It has been very fruitful hearing other regional jurisdictions' points of view and relaying ours in an open forum.

From these discussions and the recent draft proposals for a revised framework, Kitsap County has the following comments we would like considered as the discussion moves to the elected levels.

**The decision to revise the Regional Centers Framework is premature and should be included in the upcoming update to Vision 2040 and the Regional Growth Strategy.**

PSRC is ramping up for review and revision of Vision 2040 and the Regional Growth Strategy. The Regional Centers Framework is a key piece of these adopted documents. Updating the Framework in advance will put the "cart before the horse" potentially affecting reasonable decisions in the upcoming review of those documents.

Additionally, as all member jurisdictions have adopted Comprehensive Plans and received certification decisions from PSRC over the last two years, revision to the Framework could negate much of this expensive and time-consuming planning and capital facilities work. The implications could require additional updates out of the state's-directed cycles and/or grossly affect financing models in which each jurisdiction's Plan is based. Such Comprehensive Plan updates are expected after Vision 2040 and the Regional Growth Strategy are updated, but inserting a revised framework will require additional updates for many jurisdictions.

The Framework should be updated with Vision 2040 with local jurisdictions responsible for updating their Comprehensive Plans accordingly in their next GMA directed update cycle. Specifically, using our local example, Kitsap County recently adopted the Silverdale Regional Center Plan in June 2016 and are now in process of moving forward on a Silverdale strategic action plan that identifies barriers and incentives to reaching those goals, whether it be zoning, tax exemptions or infrastructure.

**Regional Centers must be positioned throughout the region to benefit the whole region and not concentrated within a narrow geographic area or jurisdiction.**

Vision 2040 and the Regional Growth Strategy identify the need to plan and support all areas of the region partly by identifying “Metropolitan” and “Core Cities” as regionally significant centers in each of the four counties. These cities and proto-cities, such as Silverdale reflect the proportional population and economic centers for each county and have been planned for the most dense growth patterns accordingly. The same principle guided designation of Manufacturing Industrial Centers (MIC’s).

The revised Framework should support the Regional Growth Strategies identification of Metropolitan and Core Cities as regionally significant centers; acknowledging the need for proportional concentration of growth by maintaining both Bremerton and Silverdale as Regional Centers and the Puget Sound Industrial Center – Bremerton as a MIC.

**The proposed Centers criteria are flawed by overemphasizing specific characteristics not available in specific areas and discounting others inappropriately.**

The proposed Framework criteria does not support the full region but reflects a distorted concentration of Regional Centers and funding distribution to Central King County. For example:

- The use of “Activity Units” is weighted to the population/employment levels of Central King County and do not reflect the region as a whole.
- The transit criteria is heavily weighted to Sound Transit light rail which has a very limited regional footprint. Transportation criteria should be multi-modal (factoring in more than light rail), reflecting a comprehensive transportation system, and should be equally applicable to all areas within the region.
- The criteria that Regional Centers must be Cities or urban growth areas associated with cities does not reflect the reality that within the Central Puget Sound, incorporation (not just annexation) has been the significant method of transitioning areas from county jurisdiction to cities.

- While a Center should be concentrated, the proposed size limitations conflict with the need to provide open space opportunities and protect environmentally-sensitive areas within an urban area. Both are sound planning principles for sustainable urban development or outright mandated by state statute. The size and activity units per acre criteria should exclude critical areas within the center.

These criteria should be amended to provide larger representation of the member jurisdictions geographies and opportunities and remove conflicts. For example, in Silverdale, many of the proposed center alternatives discount or lower Silverdale as a regional activity center for Kitsap County as a whole. This by default, is contrary to years worth of work on comprehensive planning that was conditionally certified by PSRC.

**Military installations must be considered as components of Regional Centers in close proximity to their borders, not just those adjacent.**

Military installations make up significant portions of Central Puget Sound jurisdictions' employment bases. These have historically been poorly captured as part of PSRC's planning. Often employees from these installations live and receive services from adjacent or nearby regional centers; having a significant effect on the surrounding jurisdictions' planning and capital facilities development. These regional centers must anticipate and accommodate the existing and future employment of these installations and impacts to shared infrastructure (roadways, etc.). If activity units continue to be a driver for Centers designations, installations must be considered in calculations of activity units for adjacent or nearby regional centers to ensure a full picture of regional impacts.

Silverdale is one such center within a short distance of the Naval Sub Base - Bangor and its 10,000 employees. Silverdale provides a significant amount of the housing, educational opportunities, cultural resources, open space, retail, infrastructure, medical and other services to employees and users of the base. It also shares much of the same transportation network and utilities as the installation. Yet it is completely ignored in the Framework system.

Some recently proposed language in the Centers Framework discussions has limited this consideration to only installations *adjacent* to regional centers. While adjacency should definitely be considered, it is too limiting to adequately reflect regional impacts. Military installations with a documented nexus with a nearby regional center, such as the Bangor/Silverdale relationship should also be considered.

Additionally, such "adjacency" language would inappropriately encourage regional centers to grow towards military installations, which as shown in Kitsap's recent Joint-Land Use Study

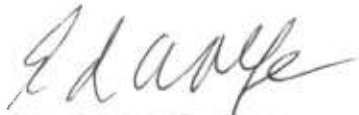
with the US Navy and the Growth Management Act, is directly contrary to the Navy's goals of limiting intrusions to base operations.

The impacts of the Naval Base - Bangor's existing employment and future growth must be considered in the Centers designation for Silverdale.

On behalf of the Kitsap County Board of Commissioners, thank you again for the opportunity to participate and comment of the PSRC Regional Centers Framework update. I hope our comments are useful in outlining Kitsap County's position as the Framework discussion proceeds forward. Additionally, Kitsap County fully supports the comments and concerns provided by the Kitsap Regional Coordinating Council in their memo dated December 5, 2016.

If you have any questions or need additional information, please contact Eric Baker, Policy Manager at (360) 337-4495 or [ebaker@co.kitsap.wa.us](mailto:ebaker@co.kitsap.wa.us).

Sincerely,



Edward E. Wolfe, Chair

cc: Kitsap County Commissioner Charlotte Garrdio  
Kitsap County Commissioner Robert Gelder  
Josh Brown, PSRC Executive Director  
Mark Gulbranson, PSRC Deputy Executive Director  
Eric Baker, Kitsap County Policy Manager  
David Forte, Kitsap County Public Works Transportation  
Louisa Garbo, Kitsap County Community Development Director



December 16, 2016

Liz Underwood-Bultmann  
Senior Planner  
Puget Sound Regional Council  
1011 Western Ave Ste 500  
Seattle, WA 98104

RE: Centers Framework Update

Dear Mrs. Underwood-Bultmann

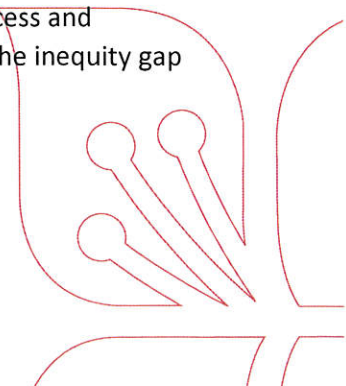
According to VISION 2040 University Place is required to plan to nearly double its population and more than double its employment between 2000 and 2040. Building the transportation infrastructure and providing the necessary facilities and services to support roughly 50,000 people and 15,000 jobs by 2040 is not an inexpensive proposition.

As the Puget Sound Regional Council (PSRC) prepared to update VISION 2020 in 2003 an announcement was made that centers were going to play a larger role in VISION 2040 and that centers were to be given priority for Federal transportation funding that was allocated by PSRC. Centers that were identified as “examples” in Pierce County Countywide Planning Policies were grandfathered and a process to designate new centers was developed, first by PSRC and then by the four counties.

The City of University Place did not exist when VISION 2020 was published and was not included as a “example” of a center in the Countywide Planning Policies. Since the announcement in 2003 the City has worked to be designated as a Regional Growth Center. First, by leading the effort to amend the Countywide Planning Policies to develop a set of policies and a process for designating new centers, then by applying to amend the Countywide Planning Policies a second time to be formally designated a “Candidate Regional Growth Center. On both occasions, the amendments were ratified by Pierce County, the City of Tacoma and others representing 60% of the jurisdictions and 75% of the population.

In 2014, the PSRC Executive Board recognized the University Place Regional Growth Center and gave it a “provisional” status subject to completing a subarea plan. Since that time the City has hired a team of consultants, held 10 public workshops and is preparing to release a draft subarea plan for review and adoption.

Just over a year ago I wrote you a letter regarding the center’s framework update project. In that letter I stated “The designation of the University Place Regional Growth Center has been a moving target since the City began the process in 2003. With each change the process became more difficult, time consuming, expensive and complex. The eligibility requirements have increased, the process and requirements are more onerous, the number of policies and actions have increased and the inequity gap between the existing centers and new centers has widened.”



As I read the preliminary draft stakeholder working group report, it became apparent that the trend was to continue. It appears there is an effort to realign the priority for federal transportation funds to favor larger existing centers, rather than distribute those funds more widely to support growth throughout the region in areas already characterized by urban growth including smaller regional growth centers. I question if the direction of the center framework update is really consistent with VISION 2040 or intended to funnel federal transportation funding to areas the market is directing growth despite the best intentions of VISION 2040.

That being said I am somewhat relieved to see that the stakeholder working group proposes to retain the minimum criteria to be designated a sub-regional center. I hope all our work to be designated a regional growth center and for federal transportation funding priority to support the growth we are required to plan for has not all been for naught.

When I read the second paragraph on page 5 of Attachment B the Draft Alternatives Evaluation Matrix, I almost lost my cool. It states in part "Minimum thresholds for existing 30 au/ac and planned 85 ac/au are higher than those for current framework and Alternative G,". This is a very high bar and I wonder if any center outside King County would meet that requirement.

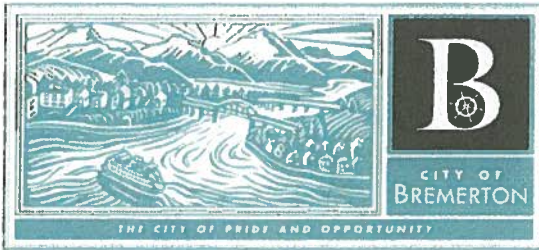
I encourage PSRC and the stakeholder working group to reconsider these alternatives and work to distribute funding to support growth throughout the region and avoid even worse transportation woes in the future.

Thank you for the opportunity to comment on the preliminary draft stakeholder working group report. The City may have additional comments as the Regional Centers Framework Update Project moves forward. Should you have any questions or concerns regarding the comments or recommendations in this letter, please do not hesitate to contact me at (253) 460-2519 or [Dswindale@cityofup.com](mailto:Dswindale@cityofup.com).

Sincerely,



David Swindale, AICP  
Director, Planning and Development Services



Mayor Patty Lent

Puget Sound Regional Council  
Attn: Liz Underwood  
1011 Western Avenue #500  
Seattle, WA 98104  
Email: [LUnderwood-Bultmann@psrc.org](mailto:LUnderwood-Bultmann@psrc.org)

[mayor@ci.bremerton.wa.us](mailto:mayor@ci.bremerton.wa.us)  
Tel 360-473-5366  
Fax 360-473-5883  
345 6th Street, Suite 600  
Bremerton, WA 98337-1873

The City appreciates the opportunity to participate in the Puget Sound Regional Council's (PSRC) Regional Center Framework discussion. As this project is progressing and more draft documents are available for review, the City would like to comment specifically about the Manufacturing and Industrial Centers reclassification:

**The Manufacturing and Industrial Centers (MIC) reformatting should consider the regional importance of the Puget Sound Regional Center-Bremerton for the west Puget Sound area and recognize the significant investments that have been made and the continuing efforts to which the City and Port of Bremerton make for this MIC to be successful.**

Within Vision 2040 Plan, the Puget Sound Industrial Center – Bremerton (formerly South Kitsap Industrial Center, SKIA) is recognized as an important industrial employment center and is the only MIC within Kitsap County. Vision 2040 recognizes MICs as important employment locations that serve both current and long-term regional economic objectives and calls for the provision of infrastructure and services in MICs necessary to serve intensive manufacturing and industrial activity.

As shown in the draft materials, Alternative M and Alternative O are the only options for the MICs and both are proposed to include two tiered system that would differentiate between “long-term role” and “preservation” of the MICs. The City of Bremerton, and the Port of Bremerton are concerned with the draft proposal of the tiered approach for MICs and classifying the PSIC-Bremerton as a “preservation” category.

As Vision 2040 identifies the importance of the MICs to serve both current and long-term regional economic objectives, all MICs should be treated equally as they all serve different industrial sectors with diverse intensities and no two MICs are the same. Vision 2040 also indicates that MICs must have sufficient infrastructure and services necessary to serve intensive manufacturing and industrial activity. With a tiered approach, the concern is that those regionally-important industrial areas that are placed in the 2<sup>nd</sup> Tier (called “reserves” or “preservation”) would not have the equal funding opportunities that the 1<sup>st</sup> Tier groups would receive and lack in funding for infrastructure of the PSIC-Bremerton may never achieve “1<sup>st</sup> Tier” status. This additional support from PSRC helps progress development by assisting financially or by other means to focus on progression in that MIC and its specific needs. If the PSIC-Bremerton was unable to obtain additional support from PSRC, it will be more difficult for Kitsap County to compete with MICs within the Puget Sound Region.



If the recommendation remains as the two-tiered approach, the City requests that policies be included that *though an existing MIC may not meet the minimal criteria of a 1<sup>st</sup> Tier, if it is the only PSRC designated MIC within the County and has shown local planning efforts such as Subarea Planning and Planned Action Ordinances, PSRC recognizes that it serves as a Regional MIC and should be classified within the 1<sup>st</sup> Tier.*

For your consideration, City of Bremerton and the Port of Bremerton have completed substantial work to prepare the PSIC-Bremerton MIC for future development. A National Planning Achievement Award for Best Practices was awarded for the 2012 Subarea Plan for this area. In addition to the Subarea Plan which supported the MIC and PSRC's Vision, a Planned Action Ordinance was also adopted in that process to assist in the predictability of development into this area. Though Kitsap County has not seen substantial industrial development like Boeing or Duwamish, the PSRC's Industrial Lands Analysis acknowledged that this areas large vacant land will be essential within the region as we grow.

In addition to just planning efforts, the Port of Bremerton, in partnership with federal, state, and local jurisdictions, have invested significantly in runway, taxiway and ramp improvements at Bremerton National Airport which has greatly increased capabilities to serve the region; the construction of fourteen pad-ready development sites with access roads within the adjacent Olympic View Industrial Park, as well as the design and construction of Airport-Industrial Way, a major backbone connector linking the airport and adjacent privately owned lands to SR3 significantly improving access freight mobility and access within the PSIB-Bremerton. The Port, as well as adjacent private property owners, has aggressively moved forward on site planning and development of these previously inaccessible lands. PSIC-Bremerton is the only MIC west of the Puget Sound Region and is positioned to benefit not just a geographic area or jurisdiction. These improvements are the foundation of investments necessary for significant job growth in the Puget Sound Region but Kitsap County and the region as a whole. An industrial park with thousands of acres available with airport, railway and highway access are the desired components for a successful MIC and all of these area present at PSIC-Bremerton.

In conclusion, the City of Bremerton and the Port of Bremerton look forward to PSRC acknowledging the regional equity of Kitsap County and the opportunity for Kitsap County to continue to be identified as an important industrial role in the multi-countywide Regional Growth Strategy. If you would like further clarification, please feel free to contact Department of Community Development Staff: Andrea Spencer (Director), Allison Satter (Senior Planner) or myself.

Thank you again for this opportunity for the City to be part of this important proposal.

Sincerely,



Mayor Patty Lent





December 20, 2016

Puget Sound Regional Council  
ATTN: Liz Underwood-Bultmann  
1011 Western Ave, Suite 500  
Seattle WA 98104  
RE: Equity in the Centers Framework Stakeholder Working Group

Dear PSRC Staff and Regional Centers Framework Stakeholder Working Group,

The Stakeholder Working Group process to redefine the framework guidelines for regional centers designation has delivered very disappointing results for regional equity. Sage participated in the Working Group primarily to advocate for a designation process centered on equity and racial justice. Given that PSRC spent millions of Federal planning dollars on Growing Transit Communities to integrate equity into regional planning, we had high expectations for the outcomes. It seemed like an opportunity to make good on equity commitments and regional compacts. However, as the stakeholder Working Group process comes to a close we are left with an impression that PSRC is not really committed to implementing policies and processes that move and commit local jurisdictions to racial equity.

With millions of dollars for regional transportation investments at stake, we see the centers designation update as a high-profile policy to lead with an equitable growth framework. An equitable centers framework could ensure that the region's lowest-income households, people of color, and those most negatively impacted by regional growth are able to live, work, and access the services they need in centrally located places. On the other hand, without an equitable centers framework we risk displacing current and locating new low income residents and communities of color further from the high quality jobs, living further from services, childcare, healthy food, and culturally relevant businesses that allow families to thrive. Sage is genuinely concerned that millions of dollars in transportation investments could be spent to uphold structural racism in regional planning.

As such, we strongly believe that the centers designation process should not be based just on density, planned growth, and transit service, but also on other criteria, such as high quality transit that serves transit dependent populations, accessibility of living-wage jobs, permanently affordable, family-sized housing, and measures put in place to prevent displacement. Unfortunately, the draft recommendations fall so short of equity criteria that we believe that the final designation criteria will include no meaningful equity outcomes at all.

1032 South Jackson Street, Suite 203, Seattle, WA 98104 • Phone: 206.568.5000 • Fax: 206.568.3798  
[www.pugetsoundsage.org](http://www.pugetsoundsage.org)

Perhaps this result was predictable. Because the centers update process was not inclusive of communities of color and did not begin by centering racial equity as a primary problem to address with policy, neither of the proposed policy alternatives address systemic racial and economic injustice.

It is a chronic failure of local governments in the region to fail to recruit people who represent low-income communities of color to participate in stakeholder and advisory bodies, and this process was no exception. This problem, and its likely outcome, are well-known - as an all-white group (including myself) we cannot fully understand the impacts of this proposal on those who face and significant racial barriers to economic inclusion and prosperity as our region grows. As an all-white group – even with the best of intentions - we cannot help but reinforce white norms and perpetuate systemic racism in our deliberation and final proposals. Even if our working group comprised of more diversity, we must go beyond checking the proverbial box by centering the process on racial justice outcomes and the valuing expertise of participants.

I was asked by Sage, and our community allies, to make the Working Group a priority and bring a community-based, equity perspective to the centers framework. However, few of the perspectives, critiques, or solutions that I have shared are reflected in the final framework proposals. While our disappointment many not be shared by other Working Group members, it should be concerning to PSRC. Puget Sound Sage dedicated over 60 hours of staff time to the centers framework update process, which I must now report to our community allies as time poorly spent considering the other priorities we have. The difficulty that PSRC has in gathering truly diverse advisory bodies will be a self-fulfilling prophecy if community representatives cannot see value it participating and cannot afford to commit their limited resources. PSRC must value our expertise in crafting and implement equitable policies, and in the same way the agency hires consultants to perform certain aspects of your work, we believe our expertise should be treated similarly

As a participant in the Stakeholder Working Group I have advocated for several additions, amendments, and retractions from the proposed framework, which were largely dismissed, or included merely as unenforceable planning criteria. While I don't expect every suggestion to be adopted in a working group like ours, I was increasingly distressed to see that the proposal has almost no equity requirements of local jurisdictions at all. The top level criteria for center designation don't even include a mention of affordable housing, which we consider a minimum equity component of any local planning. To illustrate the gap between what we consider basic equity concepts and the current proposal, we offer these suggestions that I made during the Work Group meetings.

- Require jurisdictions to document how they are meeting existing and future housing need, specifically in terms of affordability and family-sized housing, as part of the designation process. If there is no affordable housing or any housing in the center today, the jurisdiction must document the housing affordability policies and tools on the books by the time of application.
- Relying on an assessment of market readiness as a top condition for designation undermines the equitable growth of our region. The designation process should rely solely on existing or planned transportation service as a proxy for jobs and housing growth opportunities, not the potentially wishful thinking of local jurisdictions.
- Jurisdictions must document fair housing complaints and violations and have a plan to improve fair access to housing within the jurisdiction at the time of application.
- Jurisdictions must complete an assessment of transit dependent populations and create a plan to ensure these households transportation needs are met at the time of application.
- The designation process must also include enforcement mechanisms that are tied to the eventual funding. If a local jurisdiction is failing to meet commitments made to obtain center designation, they should see reduced funding until they have met their obligations.

- PSRC should require jurisdictions to produce an assessment of displacement risk, which could be a replication of the Growing Transit Communities displacement typology. For jurisdictions with limited planning resources, PSRC should assist with the planning and assessment.
- Jurisdictions applying for a Manufacturing Industrial Center designation should be required to implement, at a minimum, for priority hire in infrastructure construction funded by regional transportation funds (following the Seattle “Priority Hire” policy model) and additional tools to ensure that low-income workers and workers of color have fair access to the jobs in the MIC.

We look forward to further discussing how these recommendations can be incorporated into the centers framework update.

Sincerely,

Giulia Pasciuto  
Policy and Research Analyst  
Puget Sound Sage.

December 26, 2016

Puget Sound Regional Council  
Centers Framework Working Group  
Attn: Liz Underwood-Bultmann  
1011 Western Ave, Suite 500  
Seattle, WA 98104

Dear Ms. Underwood-Bultmann,

Thank you for the opportunity to provide feedback on the Regional Centers Framework draft materials. Together, we are a group of organizations that advocates for healthy, sustainable, and affordable transit-oriented communities that work for everyone. We believe an update of the Centers Framework is a great opportunity to ensure growth and development in line with the goals of VISION 2040. To that end, we support a framework that recognizes and helps places grow into centers that are dense, growing areas of all sizes that have prioritized environmental sustainability, equitable development, and improving access to jobs, housing, and services with sufficient transit, biking, & walking infrastructure.

We support the general direction of the alternative frameworks proposed, which create more upfront expectations for jurisdictions and clear, consistent requirements that apply to everyone. We offer the following additional comments:

#### General

- We support a new framework and criteria that are developed to reflect our regional values, not one that is shaped to accommodate the attributes of existing centers.
- We do not support the grandfathering in of any jurisdictions or locations that do not meet agreed upon criteria.
- In order to strengthen this framework, we also strongly recommend that the new framework is incorporated into both the regional and countywide PSRC funding processes to ensure that jurisdictions are meeting new requirements and implementing these requirements on an ongoing basis.
- While we support the inclusion of requirements such as “supports walkability” and “availability of pedestrian infrastructure”, we worry that these thresholds are not clear enough. Can we provide clearer expectations while allowing for jurisdictional differences?
- Although the framework descriptions focus most on the impacts to greenfields, wetlands, and floodplains, any environmental criteria should require documentation of anticipated impacts of growth plan to air quality, greenhouse gas emissions, stormwater, and more, as well as an explanation of how the jurisdiction’s growth plan mitigates these impacts.
- We favor an alternative that provides a consistent set of requirements for centers designation. As currently written, Alternative F will get us closer to this kind of good centers planning.



## Transit

- Given transit's critical role in creating sustainable, equitable, and healthy communities, we strongly support the new focus on transit in draft frameworks. As the specifics thresholds are fleshed out, we urge the working group to focus not just on transit capacity, but also include requirements around coverage, span, frequency, and quality, deferring to national best practices as needed.

## Race & Social Equity

- We would like to see the framework more explicitly address racial and social equity, and be more closely aligned with recommendations from the work of Growing Transit Communities, such as implementing a social equity impact review process for the centers framework update and also for jurisdictions applying for centers designation.
- Require jurisdictions to document how they are meeting existing and future housing need, specifically in terms of affordability and family-sized housing, as part of the designation process. If there is no affordable housing or any housing in the center today, the jurisdiction must document the housing affordability policies and tools in place at the time of application. Documentation should be required as part of the center designation process rather than a separate sub-area plan, regardless of timing.
- Jurisdictions must document fair housing complaints and violations and have a plan to improve fair access to housing within the jurisdiction at the time of application.
- We would like to see more **upfront** eligibility requirements with respect to public health and equity to demonstrate a jurisdiction's commitment to identifying and addressing racial and economic disparities in their community around health outcomes, environmental impacts, safety, access to transit and active transportation, access to affordable housing, and access to jobs, education, and services. Towards that end we propose new language be added to the "Growth Center Eligibility Requirements" on Page 19 of the December 14th Draft:

### **Social Equity**

- Documented housing affordability policies and tools.
- Replication of the Growth Transit Communities displacement typology.
- Assessment of transit dependent populations and planning to ensure households transportation needs are met.
- Social equity impact assessment required of center plan.
- Analysis of health and transit/jobs access disparities by race and income.

## Public Health

- To bolster efforts to include health as a tenth regional outcome in T2040, we suggest the explicit inclusion of public health in the eligibility criteria by requiring upfront analysis, plans, and tools to address physical activity, safety, and air quality.
- Environmental Justice: To reduce disproportionate negative environmental and community health impacts of growth and transportation infrastructure, we suggest an eligibility requirement of completing an environmental justice analysis that evaluates health and transit/jobs access disparities by race and income, with a broad plan for mitigation.

MIC designation

- See above comments on transit and social equity, in particular.
- Jurisdictions applying for a Manufacturing Industrial Center designation should be required to implement, at a minimum, for priority hire in infrastructure construction funded by regional transportation funds (following the Seattle “Priority Hire” policy model) and additional tools to ensure that low-income workers and workers of color have fair access to the jobs in the MIC.
- We do not support the addition of a third MIC Alternative that does not include job thresholds and planning elements as criteria.

Thank you again for the opportunity to comment.

Sincerely,



Shefali Ranganathan  
Executive Director  
Transportation Choices



Rebecca Saldaña  
Executive Director  
Puget Sound Sage



Christopher Wierzbicki  
Interim Executive Director  
Futurewise



---

January 12, 2017

Liz Underwood-Bultmann, Senior Planner  
Puget Sound Regional Council  
1011 Western Ave Suite 500  
Seattle, WA 98104

Dear Ms. Underwood-Bultmann

**RE: Centers Framework Update Project**

We have come together to provide comment on the Centers Framework Update Project, an important element of Vision 2040 which will have significant and positive impacts on each of our communities. Please provide this letter to the Stakeholders working group. We will be working with communities in Snohomish County, Snohomish County government and Snohomish County Tomorrow to provide the Puget Sound Regional Council comments as the Regional Centers effort moves forward. This has been an extensive process. The Stakeholder Working Group and PSRC staff are to be commended for their work. As you finalize the recommendations on January 18, please consider the following:

1. TIMING

There have been calls for a delay in the Centers process, both because Vision 2040 is due for updating in 2020 and because most local communities have just concluded their GMA Plan updates and certification. These are the very reasons this process should be concluded, not delayed. The Centers Framework Study is an outgrowth of the “Growing Transit Communities” compact adopted in 2013. The compact was, and is, an implementation tool for Vision 2040.

The Framework is likewise an implementation tool for Vision 2040 and “GTC”. Its adoption is the logical extension of a years-long process. Its results should be an input to the Vision 2040 update once centers are given a preliminary designation and the master planning called out as a condition of final approval is completed. Fitting those results into the Vision 2040 update and local comprehensive plans would be a logical conclusion to the Framework process. The proposed five-year monitoring reports will then ensure that centers remain viable and properly classified.

**Recommendation: Determine and recommend to the Growth Policy Board, a tiered system of regional centers and manufacturing industrial centers, with map locations and criteria for classification and reclassification.**

**Provide for 5-year monitoring reports, which may be used to signal changes (e.g. higher tier, lower tier, declassification).**

## 2. CENTERS CRITERIA

The designation of Manufacturing Industrial Centers should be based on potential employment and the amount of land zoned for manufacturing and industrial uses rather than just existing employment levels. This allows a community in its marketing efforts to portray a Center that is prepared for new investment and which communities are investing for growth. Requiring a minimum *existing* employment level for all tiers is self-defeating and does not reflect the changing market and the need to set aside manufacturing and industrial lands for the future.

Manufacturing and Industrial uses are recognized in Vision 2040 as “locations of intensive employment with facilities having large spaces for the assembly of goods and areas suitable for outdoor storage”. It is important to recognize and set aside land for these uses. Manufacturing is changing and the number of people to produce the same amount of items is going down because of industry using manufacturing processes, which require fewer people. There are fewer people today needed to put together a Boeing airliner than 10 years ago. There are also large warehouses, which help provide items, which are sold over the internet and have few employees compared to the square footage of the building.

**Recommendation: Establish a job threshold for Alternative O of 10,000 existing or a planning capacity of at least 20,000 jobs to be in the Regional Tier.**

## 3. IRREPLACEABLE INFRASTRUCTURE

Vision 2040 calls for Manufacturing and Industrial Centers to be “served by major regional transportation infrastructure, including rail, major highways and port facilities” “Port facilities” is not defined but we recommend that this include marine port facilities and airports.

**Recommendation: Follow Vision 2040 and have as a criterion that Manufacturing and Industrial Centers be “served by major regional transportation infrastructure, including rail, major highways and port facilities” including marine port and airports.**

## 4. MIC LAND USES

MICs should have the potential for affordable work force housing near them to ensure jobs and opportunities closer to where housing can be provided for families. A jobs-housing balance is important to have an appropriate match between the jobs and available housing supply and is encouraged by Vision 2040.



**Recommendation:** Manufacturing Industrial Centers should be located where there is nearby affordable housing and the potential for more housing.

**Require that subarea or master plan development -- required for a MIC designation -- include an element for housing and support services to serve Manufacturing and Industrial Center boundaries.**

## 5. EQUITY AND GEOGRAPHIC DISTRIBUTION

There needs to be regional equity by county for the number of regional mixed-use centers and Manufacturing and Industrial Centers. There needs to be a recognition by the PSRC that the region has a diversity of community's county by county. Each county is different and has development patterns, which reflect the history of its development and economics of its area.

Population can be used as a measure of equitable distribution where each county, for example, has one center per 100,000 population. This approach addresses the concerns of PSRC staff that there is the potential for designating too many centers. Each county over time as population grows in the PSRC region could designate more centers, which meet the established criteria. This could be one of the monitoring measures proposed in the draft framework.

**Recommendation:** Provide proportional distribution of regional centers by county *such as* one MIC per 250,000 population; one mixed use center per 100,000 population.

## 6. UNRESOLVED ISSUES

There are several issues raised by SWG members that have not been resolved as the group's work concludes. Some are noted in this statement; others are listed in the latest SWG materials<sup>1</sup>. Some issues raised by Snohomish County have not been sufficiently vetted or voted upon by the SWG. It will be difficult for the Growth Management Policy Board to resolve the issues without further SWG discussion or a SWG vote.

**Recommendation:** Address issues that remain unresolved on January 18.

**Clearly indicate to the Growth Policy Board, which issues have a SWG recommendation and those that do not.**

## 7. PREFERRED ALTERNATIVE

The discussion of Alternatives is now down to two for Regional Centers ("F" and "G") and a discussion on what is a "Local" ("Countywide") centers.

The Alternatives for Manufacturing Industrial Centers are "M" or "O". We support "O". With the proposed amendment to the criteria, this would support Paine Field and Arlington Maryville as Regional MICs.

---

<sup>1</sup> "Stakeholder Working Group Comments On November 22 Draft Report", Sections D & E.

**Recommendation: We recommend:**

- **Alternative Menu Hybrid G for Regional Centers.**
  - **Edmonds, Everett and Lynnwood**
- **Alternative O for Manufacturing Industrial Centers with the addition of the criteria of a planning capacity of at least 20,000 jobs to be in the Regional Tier or the presence of Irreplaceable Infrastructure as discussed above.**
  - **Paine Field and Arlington-Marysville as a Regional MIC**

8. CENTERS LOCATION

The regional mixed-use centers should allow for light rail transit centers within UGAs but outside cities. These areas should be in areas, which are part of a Municipal Urban Growth Area and will be annexed in the future UGAs which are intended to provide for population and job growth; and to ensure that public facilities are “concurrent” with growth.

**Recommendation: Allow mixed-use regional centers within UGA boundaries where they are part of a Municipal Urban Growth Area and will be annexed in the future.**

9. FUNDING IMPLICATIONS

The effect of a particular tier designation on state or federal funding remains unclear. As currently outlined, there is an apparent spot in the funding queue where higher tier centers are more advantaged than those the Regional Tier 2, County Tier or local levels.

It is unclear what other sources would be available that fall under the RTPO purview.

**Recommendation: We recommend that the Framework specifically identify the types of funding for which a Centers designation is eligible to the exclusion of non-Center communities.**

10. PROCESS AND TIMING FOR DESIGNATION AS A CENTER

The current process allows communities to apply for Regional Center and Manufacturing and Industrial Center designation when they meet the criteria. Staff has suggested limiting application to only times of updates of Vision 2040 or Comprehensive Plan updates.

We believe this is too long. Vision 2040 was adopted in 2008 and is planned to be updated in 2020 (12 years) and Comprehensive Plans are updated every 8 years under State Law. This is too long of a time and to put in perspective this is 2 or 3 terms of local elected officials.

**Recommendation: The current process allowing application at any time or an established every 2-year process is more practical than every 8 or 12 years.**

Sincerely yours,



Mayor Barbara Tolbert  
City of Arlington



Mayor Jon Nehring  
City of Marysville

cc: Josh Brown, PSRC Executive Director  
Mark Gulbranson, PSRC Deputy Executive Director  
Snohomish County Tomorrow Steering Committee