

**Non-Project Final
Environmental Impact Statement**

COMMUNITY PLAN UPDATES

**Frederickson, Mid-County,
Parkland-Spanaway-Midland and
South Hill Community Plans**

Prepared by Pierce County



May 2020

NOTICE OF AVAILABILITY
NON-PROJECT FINAL ENVIRONMENTAL IMPACT STATEMENT
Application Number: 907424
**COMMUNITY PLAN UPDATES – FREDERICKSON, MID-COUNTY, PARKLAND-SPANAWAY-
MIDLAND, and SOUTH HILL**

May 27, 2020

Pierce County has issued a Non-Project Final Environmental Impact Statement (FEIS) for the Community Plan Updates proposal, pursuant to the State Environmental Policy Act (SEPA). The FEIS complements the Draft Environmental Impact Statement (DEIS) issued on April 5, 2019. The FEIS and DEIS provide non-project-level environmental review of probable impacts and mitigation measures for the Community Plan Updates proposal and three other alternatives. Elements of the environment addressed in the Environmental Impact Statement (EIS) include land use, plans and policies, traffic and transportation, air quality, surface water, groundwater, flood areas, wetlands and shorelines, public services and utilities, human health and community well-being, housing, and climate change.

The Community Plan Updates proposal involves concurrent updates to four Community Plans in Pierce County's central Urban Growth Area: Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill; the proposal includes changes to plan text, policies, land use, and zoning. The FEIS analyzes and responds to all comments received on the Draft Environmental Impact Statement (DEIS) and includes additional studies and modeling to support the DEIS analysis.

There is no comment period on the FEIS. The FEIS may be appealed under the State Environmental Policy Act (SEPA) (RCW 43.21C.075). In some cases, the SEPA appeal must be combined with any appeal of the underlying governmental action pursuant to RCW 43.21C.075(2)(a). SEPA appeals associated with legislative actions taken by the Pierce County Council pursuant to the requirements of the Growth Management Act must be appealed to the Growth Management Hearings Board (PCC 1.22.080.B.1.k and RCW 36.70A.280(1)(a)). The appeal must be filed with the Growth Management Hearings Board within sixty (60) days following publication in the County paper of record for the underlying governmental action pursuant to RCW 36.70.290(2) and WAC 242-03-200. Review *Practicing Before the Growth Management Hearings Board Handbook* for additional information on the appeal process.

The FEIS is available online at: piercescountywa.gov/cpupdateEIS. Hard copies of the FEIS will not be available until Pierce County has determined that the document can be printed and furnished in a manner that ensures the safety of Pierce County personnel and the general public, or until otherwise required by law.

For further information about this proposal, please contact Erik Jaszewski, Associate Planner, at (253) 798-3752 or erik.jaszewski@piercescountywa.gov.

Sincerely,



Kathleen Larrabee, Manager, Resource Management
for Dennis Hanberg, Responsible Official



May 27, 2020

**RE: Non-Project Final Environmental Impact Statement – Community Plan Updates
(Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill)
Application Number: 907424**

To Whom It May Concern,

Pierce County has issued a Non-Project Final Environmental Impact Statement (FEIS) for the Community Plan Updates proposal. The FEIS complements the Draft Environmental Impact Statement (DEIS) issued on April 5, 2019. This FEIS and DEIS provide non-project-level environmental review of probable impacts and mitigation measures for the Community Plan Updates proposal and three other alternatives. Elements of the environment addressed in the Environmental Impact Statement (EIS) include land use, plans and policies, traffic and transportation, air quality, surface water, groundwater, flood areas, wetlands and shorelines, public services and utilities, human health and community well-being, housing, and climate change.

The Community Plan Updates proposal involves concurrent updates to four Community Plans in Pierce County’s central Urban Growth Area: Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill; the proposal includes changes to plan text, policies, land use, and zoning. The FEIS analyzes and responds to all comments received on the Draft Environmental Impact Statement (DEIS) and includes additional studies and modeling to support the DEIS analysis.

The FEIS is a disclosure document and does not authorize a specific action or alternative, nor does it recommend for or against a particular course of action; rather, the DEIS and FEIS will be used by the Pierce County Council when considering the Community Plan Updates proposal. A list of expected licenses, permits, and approvals is contained in the Fact Sheet to this FEIS.

The Final Environmental Impact Statement (FEIS) for this project will accompany the four Community Plan updates and will be considered as the final environmental (State Environmental Policy Act “SEPA”) document relative to those Plans.

In general, this FEIS is organized into four sections:

- **Fact Sheet:** Provides an overview of the Proposed Action, Two Action Alternatives, and the No Action Alternative; identifies the SEPA responsible official and contact person; notes expected permits/approvals that will be required; provides information concerning the availability of the FEIS; and contains the Table of Contents for this document.
- **Chapter 1 – Summary:** Reflects revisions made since issuance of the DEIS. The DEIS Summary Chapter included a more comprehensive summary of the Proposed Action, Two

Action Alternatives, and the No Action Alternative than provided in the Fact Sheet, together with a summary of significant environmental impacts, mitigation measures, and significant unavoidable adverse impacts.

- **Chapter 2 – Alternatives:** Reflects revisions made since issuance of the DEIS. The DEIS Alternatives Chapter provided further description of the Proposed Action, Two Action Alternatives, and the No Action Alternative.
- **Chapter 3 – Affected Environment, Impacts, Mitigation:** Contains revisions made since issuance of the DEIS. The DEIS Affected Environment, Impacts, Mitigation Chapter included an analysis of probable significant environmental impacts that could result from implementation of the Proposed Action, Two Action Alternatives, and the No Action Alternative in relation to land use and built environment, plans and policies, transportation, public services and utilities, air quality, groundwater and surface water, shorelines, wetlands, and human health and community well-being. This section also identifies mitigation measures and significant unavoidable adverse impacts.
- **Chapter 4 – Comment Letters and Responses:** Analyzes and responds to all comments received on the Draft Environmental Impact Statement (DEIS) and provides additional studies and modeling to support the DEIS analysis.

There is no comment period on the FEIS. The FEIS may be appealed under the State Environmental Policy Act (SEPA) (RCW 43.21C.075). In some cases, the SEPA appeal must be combined with any appeal of the underlying governmental action pursuant to RCW 43.21C.075(2)(a). SEPA appeals associated with legislative actions taken by the Pierce County Council pursuant to the requirements of the Growth Management Act must be appealed to the Growth Management Hearings Board (PCC 1.22.080.B.1.k and RCW 36.70A.280(1)(a)). The appeal must be filed with the Growth Management Hearings Board within sixty (60) days following publication in the County paper of record for the underlying governmental action pursuant to RCW 36.70.290(2) and WAC 242-03-200. Review *Practicing Before the Growth Management Hearings Board Handbook* for additional information on the appeal process.

You can access the FEIS online at: piercecountywa.gov/cpupdateEIS. Due to the public health emergency in place at the time of FEIS issuance, hard copies of the FEIS will not be available until Pierce County has determined that the document can be printed and furnished in a manner that ensures the safety of Pierce County personnel and the general public, or until otherwise required by law.

For further information about this proposal, please contact Erik Jaszewski, Associate Planner, at (253) 798-3752 or erik.jaszewski@piercecountywa.gov.

Sincerely,



Kathleen Larrabee, Manager, Resource Management
for Dennis Hanberg, Responsible Official

NON-PROJECT FINAL ENVIRONMENTAL IMPACT STATEMENT

for the

COMMUNITY PLAN UPDATES

Frederickson, Mid-County, Parkland- Spanaway-Midland and South Hill Community Plans

Pierce County

The Non-Project Final Environmental Impact Statement (FEIS) for the *Community Plan Updates* has been prepared in compliance with the State Environmental Policy Act of 1971 (Chapter 43.21C, Revised Code of Washington) and the SEPA Rules, effective April 4, 1984, as amended (Chapter 197-11, Washington Administrative Code). Preparation of this FEIS is the responsibility of Pierce County. Pierce County has determined that this document has been prepared in a responsible manner using appropriate methods and has directed the areas of research and analysis that were undertaken in preparation of this FEIS. This document is not an authorization for an action, nor does it constitute a decision or a recommendation for an action; in its final form, it will accompany the *Proposed Actions* and will be considered in making the final decisions on the proposal.

Date of Draft Environmental Impact Statement Issuance.....April 5, 2019

Date of Final Environmental Impact Statement Issuance May 27, 2020

Fact Sheet

Information changed or deleted after the issuance of the Draft Environmental Impact Statement is highlighted/circled in gray and/or struck-out to ease identification of the changed information.

Name of Proposal

Pierce County Community Plan Updates Non-Project ~~Draft~~Final Environmental Impact Statement (~~DEIS~~FEIS)

Location

The area addressed by this ~~DEIS~~FEIS is made up of the geographic area of the Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill Community Plan areas, which comprise the central unincorporated urban area of Pierce County.

Proponent

The proponent is Pierce County.

Proposed Action

The proposed action consists of several related actions, including:

1. Amendments to Pierce County Comprehensive Plan policies and land use designations/zoning in support of Community Plan Updates including Centers and Corridors.
2. Adoption of the updated Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill Community Plans, including updates to:
 - a. Community plan policies.
 - b. Community plan zoning, pursuant to proposals by the Land Use Advisory Commissions of the four communities and property owners, including:
 - i. Policies and zoning changes for the Portland Avenue Corridor in the Parkland-Spanaway-Midland Communities Plan.
 - ~~ii. Policies and zoning changes for changes from Residential Resource/Single Family zones to Moderate Density Single Family affecting all four communities.~~
3. Adoption of development regulations to implement the Community Plan Updates, including:
 - a. Amendments to the Zoning Atlas to reflect the zoning changes.
 - b. Density, setback, height, use tables, sign and design standards.
4. Adoption of a draft and final EIS for this non-project proposal.

EIS Alternatives

The ~~DEIS~~FEIS considers four alternatives, as briefly summarized below:

Alternative 1 – Proposed Action: Community Plan Updates. The Proposed Action includes all the actions noted in the Proposed Action outlined above; however, Alternative 1 is distinguished from Alternative 2 by the inclusion of a Neighborhood Corridor zone in areas along Pacific Avenue, Meridian Avenue East and 176th Street East to provide a transition from Urban Corridors or to designate areas for moderate density residential.

Alternative 2: Community Plan Updates with More Intensive Centers and Corridors. Alternative 2 includes all the updates of Alternative 1 – Proposed Action; however, this alternative proposes the Urban Corridor zone along Pacific Avenue and Meridian Avenue East without the Neighborhood Corridor transition zone. The Urban Corridor zone allows for higher density than the Neighborhood Corridor.

Alternative 3: Community Plan Updates without Centers and Corridors. Alternative 3 includes all the updates of Alternative 1 – Proposed Action except Centers and Corridors.

Alternative 4: No Action Alternative. Alternative 4 would maintain the existing policies and zoning in the Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill Community Plans.

Changes to Proposed Action and Alternatives Subsequent to DEIS Issuance

Since issuance of the DEIS on April 5, 2019, and in response to comments received on the DEIS, the FEIS has modified the Proposed Action and Alternatives to omit significant rezones of Residential Resource (RR) and Single Family (SF) zones to the Moderate-Density Single Family (MSF) zone. Note that some small-scale rezones of RR and SF properties to the MSF zone have been retained, comprising approximately 43 acres out of the originally analyzed 4,629 acres, as further detailed in the FEIS.

Phased Review Approach

The EIS is prepared as a non-project EIS under Phased Review per WAC 197-11-060(5) and WAC 197-11-776, which provide lead agencies the ability to cover general matters in broader environmental documents with subsequent narrower documents concentrating solely on the issues specific to the later analysis.

Lead Agency

Pierce County
Planning & Public Works Department

Responsible SEPA Official

Dennis Hanberg, Director
Pierce County Planning & Public Works
2401 South 35th Street, Suite 2
Tacoma, WA 98409

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Final Actions

Adoption of updates to the Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill Community Plans, including policy and zoning changes, development regulations and additional policy language in the Comprehensive Plan for Centers and Corridors. Final action will be by the Pierce County Council by Ordinance adopting the four Community Plans, development regulations, and the Comprehensive Plan amendments.

Appeals

The Responsible Official has issued this FEIS for a non-project action, which may be appealed under the State Environmental Policy Act (SEPA) (RCW 43.21C.075). In some cases, the SEPA appeal must be combined with any appeal of the underlying governmental action pursuant to RCW 43.21C.075(2)(a). SEPA appeals associated with legislative actions taken by the Pierce County Council pursuant to the requirements of the Growth Management Act must be appealed to the Growth Management Hearings Board (PCC 1.22.080.B.1.k and RCW 36.70A.280(1)(a)). The appeal must be filed with the Growth Management Hearings Board within sixty (60) days following publication in the County paper of record for the underlying governmental action pursuant to RCW 36.70.290(2) and WAC 242-03-200. Review *Practicing Before the Growth Management Hearings Board Handbook* for additional information on the appeal process.

Licenses and Permits

Future development based on the policy and zoning changes proposed will require additional permits, including:

Pierce County Planning & Public Works Department

- Draft and Final EIS approvals
- Preliminary Plat approval
- Final Plat approval
- Site Development permits including grading, stormwater, erosion control, and road improvements
- Building permits
- Right of Way permits

- Road Improvement permits
- Sewer Connection permits
- Sewer Extension permits
- Mechanical permits
- Plumbing permits

Tacoma-Pierce County Health Department

- ~~Mechanical permits~~
- ~~Plumbing permits~~
- Well permits
- Onsite Sanitary System permits

Puget Sound Clean Air Agency

- Notice of Construction
- Notice of Completion

State of Washington

- General Permit to Discharge Stormwater (NPDES Permit)
- Hydraulic Project Approvals

Principal EIS Authors and Principal Contributors

This Pierce County Community Plan Updates has been prepared by Pierce County Planning & Public Works Department staff with input from local public services and utility providers.

Principal Authors

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Date of DEIS Issuance

April 5, 2019

~~Date of Draft Plan and DEIS Open Houses~~

~~April 13, 2019~~

~~Date DEIS Comments are Due~~

~~May 20, 2019~~

~~Date of FEIS Issuance~~

~~May 27, 2020~~

~~Written comments are to be submitted to:~~

~~Pierce County Planning & Public Works~~

~~Attn: Jeffrey D. Mann~~

~~2401 South 35th Street~~

~~Tacoma, WA 98409~~

~~or via e-mail: jeff.mann@piercecountywa.gov~~

~~Comments may also be submitted online through the Community Plan Updates webpage found here:~~

~~https://www.co.pierce.wa.us/FormCenter/Planning_Land_Services_13/Community_Plan_UpdateGeneral_Comments_451~~

~~Date of Final Action~~

~~County Council consideration of the Community Plan Updates, development regulations, and Comprehensive Plan amendments is anticipated no sooner than ~~September 2019~~Fall 2020.~~

~~Availability of DEIS and FEIS~~

~~The DEIS, comments on the DEIS, and FEIS may be found online ~~on the Planning & Public Works Community Plan Updates webpage under the Environmental Impact Statement tab found~~ at:~~

~~<https://www.co.pierce.wa.us/5736/Environmental-Impact-Statement-EIS>~~

~~Hard copies of the FEIS will not be available for inspection or purchase during the declared statewide emergency, and in accordance with Governor Inslee's Proclamation 20-28, until Pierce County has determined that the document can be printed and furnished in a manner that ensures the safety of Pierce County personnel and the general public, or until otherwise required by law. At that time, hard copies of the ~~DEIS~~FEIS may be ordered for a fee at the following location:~~

~~Pierce County Planning & Public Works~~

~~Attn: ~~Jeffrey D. Mann~~ Erik Jaszewski~~

~~2401 South 35th Street~~

~~Tacoma, WA 98409~~

~~or via e-mail: jeff.mann@piercecountywa.gov erik.jaszewski@piercecountywa.gov~~

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1 Summary

1.1 Introduction

This chapter briefly describes the alternatives considered and provides a summary of the impact and proposed mitigation measures that may occur under the alternatives. A more detailed discussion of the alternatives is provided in Chapter 3 of this DEIS. Final Environmental Impact Statement (FEIS).

1.2 Background

During the Comprehensive Plan periodic update in 2015, several communities expressed interest in updating their community plans. The community plans were adopted in the early to mid-2000s and enough changes have occurred in the communities that updates were needed. The Pierce County Council authorized the update to the four Community Plans through the budget allocation for Planning and Public Works in 2016 and subsequent years. Work with the Land Use Advisory Commissions (LUAC) for each of the communities has led to recommended policy and zoning changes. Property owners have also been able to suggest zoning changes. Other updates include the introduction of the Centers and Corridors designations (described in Chapter 2.2), which build upon the land use pattern of more intensive commercial, industrial, and residential development along the County's major corridors (including 112th Street East, Meridian Avenue East/SR-161, 176th Street East, Canyon Road East, and Pacific Avenue/SR-7). Early and continuous public outreach and involvement have included multiple property owner notifications, open houses, and LUAC study sessions over the last three years.

1.3 Proposal

The proposal under review in this DEIS are updates to the Frederickson, Mid-County, South Hill, and Parkland-Spanaway-Midland community plans, with associated changes to policies, zoning, development regulations, and the Comprehensive Plan.

1.4 Proposal Objectives

The objectives of the Community Plan Updates are to

- update policy direction for each community; and
- adjust zoning to reflect property owner requests and changes in development patterns and community goals.

The objectives of the Centers and Corridors policy and land use changes are to

- maximize the use of the UGA and existing infrastructure;
- use infrastructure investment to guide growth;
- focus and incentivize growth along Centers and Corridors;
- promote densities to support greater accessibility to transit;
- implement Comprehensive Plan policies related to Centers and Corridors;

-
- encourage redevelopment to increase economic viability;
 - increase the use of lands designated for single-family development; and
 - modify County development regulations to implement the Community Plan Updates.

1.5 Purpose

The purpose of the proposed action is the adoption of the updated Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill community plans, including updates to:

- Comprehensive Plan policies;
- Community Plan policies;
- Zoning, including rezones related to:
 - Portland Avenue Corridor in the Parkland-Spanaway-Midland Communities Plan; and
 - Centers and Corridors (all four Community Plans)
 - Some single-family areas zoned Residential Resource and Single Family to Moderate Density Single Family
 - LUAC proposals and other requests by property owners (all communities)

1.6 Need

During the 2015 Comprehensive Plan update citizens and members of the LUACs requested the opportunity to update community plans because it had been 10-15 years since the original plans were created and the Comprehensive Plan calls for frequent updates.

The 2015 Pierce County Comprehensive Plan adopted policies to designate Centers/Central Places and Transit-Oriented Corridors through updates to the community plans.

1.7 Alternatives Description

The DEIS/FEIS considers four alternatives, as briefly summarized below:

Alternative 1 – Proposed Action: Community Plan Updates. The Proposed Action includes the actions noted here:

1. Amendments to Pierce County Comprehensive Plan policies and land use designations/zoning in support of Community Plan Updates, including Centers and Corridors.
2. Adoption of the updated Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill Community Plans, including updates to:
 - Community Plan policies.
 - Community Plan zoning, pursuant to proposals by the LUACs of the four communities and property owners including:
 - Policies and zoning changes for the Portland Avenue Corridor in the Parkland-Spanaway-Midland Communities Plan.

~~• Policies and zoning changes for changes from Residential Resource/Single Family zones to Moderate Density Single Family affecting all four communities.~~

3. Adoption of development regulations to implement the Community Plan Updates, including:
 - a. Amendments to the Zoning Atlas to reflect the zoning changes.
 - b. Density, setback, height, use tables, sign and design standards.
4. Adoption of a draft and final EIS for this non-project proposal.

Alternative 2: Community Plan Updates with More Intensive Centers and Corridors. Alternative 2 includes all the updates of Alternative 1 – Proposed Action; however, this alternative proposes the Urban Corridor zone along Pacific Avenue and Meridian Avenue East without the Neighborhood Corridor transition zone. The Urban Corridor zone allows for higher density than the Neighborhood Corridor.

Alternative 3: Community Plan Updates without Centers and Corridors. Alternative 3 includes all the updates of Alternative 1 – Proposed Action except the policies and zoning related to Centers and Corridors.

Alternative 4: No Action Alternative. Alternative 4 maintains the existing policies and zoning in the Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill Community Plans.

1.8 Summary of Impacts and Mitigation Strategies

Table 1-1 Summary of Impacts and Mitigation Strategies

Topic	Impacts	Mitigation Measures
3.1 Land Use and Built Environment	<p><u>Common to all Alternatives</u></p> <ul style="list-style-type: none"> • Increased employment and housing growth, though geographic distribution differs among alternatives with Alternatives 1 and 2 concentrating growth along major transportation corridors • High-density development and a wide mix of land uses concentrated along transportation corridors under Alternatives 1 and 2 • Higher-density and a mix of residential and commercial uses adjacent to single-family homes • Demolition of existing structures, conversion of existing uses to higher-intensity uses 	<p><u>Common to All Alternatives</u></p> <ul style="list-style-type: none"> • New, higher-density and intensity of development (like commercial) permitted under plan to accommodate any displaced uses • Permitted uses are intended to be generally compatible (e.g. restaurants, grocery stores, and apartments) • Development Regulations related to design, character, landscaping, and height reduce potential for incompatible development and land use incompatibility • The County is working to provide Homebuyers within the JBLM operations noise impact area a

Topic	Impacts	Mitigation Measures
	<ul style="list-style-type: none"> Growth and development under all the alternatives in the Parkland-Spanaway-Midland Community Plan area would occur within areas impacted by Joint Base Lewis-McChord operations. Growth and development along a portion of Meridian Avenue East in the South Hill area is located within the Area of Influence (AOI) of Thun Field. <p><u>Alternative 1</u></p> <ul style="list-style-type: none"> Abrupt transitions in scale, use, and bulk between existing buildings and new buildings Greater mix of commercial uses with residential uses <p><u>Alternative 2</u></p> <ul style="list-style-type: none"> Abrupt transitions in scale, use, and bulk between existing buildings and new developments Greater mix of commercial uses with residential uses and light-industrial uses Allows high-density development immediately adjacent to single-family zones <p><u>Alternative 3</u></p> <ul style="list-style-type: none"> No further impact <p><u>Alternative 4</u></p> <ul style="list-style-type: none"> Continues sprawling pattern of commercial and low- to medium-density residential development Increased development pressure on single-family zones and neighborhoods across community plan areas 	<p>real estate disclosure notice to advise them of noise impacts.</p> <ul style="list-style-type: none"> The restrictions on height and occupancy density will limit development within the Thun Field Area of Influence (AOI). Comprehensive Plan policies and existing regulations require Pierce County to coordinate with JBLM on land use plans and restrict certain development from locating within the McChord Air Force Base AOI <p><u>Common to Alternatives 1 and 2</u> The Centers and Corridors proposal will mitigate potential impacts of development pressure on existing single-family zoned areas and rural lands.</p>
3.2 Plans and Policies	<p><u>Common to All Alternatives</u></p> <ul style="list-style-type: none"> All alternatives continue to promote growth within the UGA and preserve the rural areas of the Mid-County Community Plan and adjacent rural areas outside the Plan consistent with the 	<p><u>Common to All Alternatives</u></p> <ul style="list-style-type: none"> Alternatives 1 and 2 would be consistent with regional, countywide and Comprehensive Plan policies to direct growth to centers, particularly the County's Comprehensive Plan policy to

Topic	Impacts	Mitigation Measures
	<p>Growth Management Act, Multi-County Planning Policies, Countywide Planning Policies and the Pierce County Comprehensive Plan</p> <ul style="list-style-type: none"> All alternatives will increase housing and population and utilize urban land. Continued development will eventually require the expansion of the UGA and affect rural areas Policy changes within the Frederickson and South Hill Communities support the designation of these communities as Potential Incorporation Areas (PIAs) <p><u>Alternatives 1 and 2</u></p> <ul style="list-style-type: none"> Designate Centers consistent with Multicounty Planning Policies, Countywide Planning Policies, and the Pierce County Comprehensive Plan policies for Centers/Central Places and Transit-Oriented Corridors 	<p>designate Centers/Central Places and Transit-Oriented Corridors.</p> <ul style="list-style-type: none"> The proposal by the Frederickson and South Hill Communities to be designated as PIAs would be consistent with Multi-County Planning policies. <p><u>Alternatives 1 and 2</u></p> <ul style="list-style-type: none"> Alternatives 1 and 2 will increase densities and allow for more efficient use of urban land and the infrastructure to serve it. More efficient use of urban land will reduce or delay the need to expand the UGA <p><u>Alternative 3</u></p> <ul style="list-style-type: none"> Alternative 3 will increase density in isolated areas but will not provide a framework for effective allocation of infrastructure funds to accommodate increased density and transit. <p><u>Alternatives 3 and 4</u></p> <ul style="list-style-type: none"> Alternatives 3 and 4 would be inconsistent with the Pierce County Comprehensive Plan to locate future density and prioritize infrastructure expenditure in Centers and Transit Oriented Corridors.

Topic	Impacts	Mitigation Measures
3.3 Transportation	<p data-bbox="443 268 805 300"><u>Common to All Alternatives</u></p> <ul data-bbox="443 306 932 499" style="list-style-type: none"> <li data-bbox="443 306 886 380">• Increased traffic on congested roadways and highways <li data-bbox="443 386 891 420">• Additional demand for parking <p data-bbox="443 426 708 457"><u>Alternatives 1 and 2</u></p> <ul data-bbox="443 464 932 499" style="list-style-type: none"> <li data-bbox="443 464 932 499">• More pedestrian and bicycle trips 	<p data-bbox="964 268 1326 300"><u>Common to All Alternatives</u></p> <ul data-bbox="964 306 1453 1892" style="list-style-type: none"> <li data-bbox="964 306 1349 457">• Expand roadway capacity through Pierce County Concurrency Management System and Traffic Impact Fees <li data-bbox="964 464 1435 573">• Plan policies encourage public infrastructure investment along major transportation corridors <li data-bbox="964 579 1446 846">• Alternatives 1 and 2 increase potential for high-density and mixed residential and commercial development that reduce driving and parking demand through walking, biking, and transit use <li data-bbox="964 852 1442 1003">• Alternatives 1 and 2 require provision of new pedestrian and bicycle infrastructure as part of new developments <li data-bbox="964 1010 1442 1119">• Proposes list of capital improvements to transportation infrastructure <li data-bbox="964 1125 1419 1234">• Existing Commute Trip Reduction program reduces vehicle miles traveled <li data-bbox="964 1241 1435 1350">• Minimum parking requirements accommodate parking in new development <li data-bbox="964 1356 1446 1472">• Permitted development patterns that support future expansion of transit service and service areas <li data-bbox="964 1478 1360 1629">• Proposed development regulations support future provision of bicycle and pedestrian facilities <li data-bbox="964 1635 1430 1892">• Provide Washington State Department of Transportation opportunity to review and comment on future developments that may impact State Route 7 and State Route 161

Topic	Impacts	Mitigation Measures
<p>3.4 Public Services and Utilities - Fire Services</p>	<p><u>Common to All Alternatives</u></p> <ul style="list-style-type: none"> • Increased Service Calls • Increased allowable heights • Increases in required equipment • Increased response times due to increased traffic 	<p><u>Common to All Alternatives</u></p> <ul style="list-style-type: none"> • Under all alternatives, ongoing district capital facilities improvement, budgeting, and operational planning efforts are anticipated to address incremental increases and other changes in demand for fire services, including the need for facility improvements and additional apparatus. • Under all alternatives, new development would be constructed in compliance with the County’s current fire and building code. • Under all alternatives, tax revenue from new development would increase funds available to the districts. • Fire districts can prepare capital facilities plans to address the need for fire impact fees to cover initial impacts from new development <p><u>Alternatives 1 and 2</u></p> <ul style="list-style-type: none"> • Under Alternatives 1 and 2, building heights could be reduced to mitigate the need for specialized equipment for taller buildings. • Under Alternatives 1 and 2, the concentration of residential and commercial development along the major corridors will allow fire districts to locate stations in these areas to maximize the service to more people within smaller areas. • Work to implement a Capital Facilities Plan (CFP) if approved by the County Council

Topic	Impacts	Mitigation Measures
		<p>Work with Central Pierce Fire & Rescue to identify potential amendments to the County's Fire Code and related development regulations and support mutually agreed upon regulation changes for review and adoption by County Council</p>
<p>3.4 Public Services and Utilities - Parks and Recreation</p>	<p><u>Impacts common to all alternatives</u></p> <ul style="list-style-type: none"> • Growth is expected in the affected area under all four alternatives. Increased housing and commercial space could contribute to higher use of parks, recreation facilities, and open space. The Parks and Recreation Department will need to respond to change based on their own adopted level of service standards and planning priorities. • Development and re-development in the area could result in a corresponding increase in funding available from impact fees. The fees are intended to help offset the effects of growth. 	<p><u>Impacts common to all alternatives</u></p> <ul style="list-style-type: none"> • Updates to the Parks, Recreation, and Open Space plan will continue based on community needs • Regular updates to the Capital Improvement Program • Impact fees, real estate excise tax, and other funding sources • Develop a more thorough parks funding strategy • Improve requirements for incorporating parks and open space into heavily dense urban environments • Consider residents' distance and access to parks when siting or expanding park facilities in the future
<p>3.4 Public Services and Utilities - Police Services</p>	<p><u>Alternatives 1 and 2</u></p> <ul style="list-style-type: none"> • The Community Plan Updates area is served by the Pierce County Sheriff's Department. The impacts to Sheriff's services would include increased calls for service in areas with higher population densities. • This plan would have a high likelihood of increasing the fiscal burden of the Sheriff's Department. The need for overlapping patrol hours, officers, and equipment concurrency would increase in line with the 	<p><u>Alternatives 1 and 2</u></p> <ul style="list-style-type: none"> • Sheriff services are funded from the general fund of Pierce County. Increases in development would increase funds raised through property taxes and allocated to the Sheriff's Department through the Pierce County budget. Allocation of budget funds for additional deputies and equipment would mitigate for additional demands on services. • By increasing density in localized Centers and along Corridors, the

Topic	Impacts	Mitigation Measures
	<p>population increase. Also, the need for housing of criminals would be impacted by the proposed actions.</p> <ul style="list-style-type: none"> Potential impacts to response time from additional traffic. 	<p>Sheriff’s Department can more efficiently deploy services in overlapping patrols and focus their patrols in specific areas. Reducing sprawl in Pierce County and focusing development within a largely urban area would result in lower costs for similar services.</p> <ul style="list-style-type: none"> The focus on growth within the main corridors would also provide an opportunity for Sheriff and fire services to look at creating public safety facilities which would provide both fire and Sheriff services for the area.
3.4 Public Services and Utilities - Public Water	<p><u>Alternatives 1 and 2</u></p> <ul style="list-style-type: none"> All alternatives would result in additional residential, commercial, and industrial demand for water. 	<p><u>Alternatives 1 and 2</u></p> <p>Water purveyors have indicated that through their water supply planning, they will be able to accommodate water demand for the alternatives with existing or future water rights, existing or future interties with other water purveyors, and designing for fire flow.</p>
3.4 Public Services and Utilities - Sanitary Sewer	<p><u>Alternatives 1 and 2 – Sewer Treatment Plant</u></p> <ul style="list-style-type: none"> The County has planned through the Sewer Improvement Program for 2% annual growth in the service area. The proposed land use changes within the Community Plan Updates may increase that to approximately 3.5% annual growth over 20 years. This could result in flows that would arrive 75% faster to the Chambers Creek Facility than were originally projected. Expansion projects would need to be fast-tracked to accommodate increased development. 	<p><u>Alternatives 1 and 2 – Sewer Treatment Plant</u></p> <ul style="list-style-type: none"> The proposed land use changes of the Community Plan Updates may not change the needed expansions outlined in the Existing Conditions section but would rather accelerate them several years depending on the speed of the buildout in these areas and the rest of the UGA. <p><u>Alternatives 1 and 2 – Major Trunk Lines</u></p> <ul style="list-style-type: none"> The major trunk line projects and their timing will all be reevaluated as part of the USP update. Increased discharge

Topic	Impacts	Mitigation Measures
	<ul style="list-style-type: none"> • More restrictive regulations by the Department of Ecology could also affect and change these timeline estimates. This and other possibilities will be evaluated as part of the upcoming USP update. <p><u>Alternatives 1 and 2 – Major Trunk Lines</u></p> <ul style="list-style-type: none"> • There are several major trunk lines that serve the Centers and Corridors areas that are planned to be upsized in the next 20 years. Similar to the WWTP, the proposed land use changes of the Community Plan Updates may require the timing of proposed trunk line projects to be accelerated accordingly. These projects and their timing for inclusion into the Capital Facilities Plan will be reevaluated as part of the USP update. <p><u>Alternatives 1 and 2 – Local Sewer Lines</u></p> <ul style="list-style-type: none"> • Local sewer lines (8” diameter - 18” diameter) may need to be upsized depending on the specific location of increased densities over the next 20 years. In general, the smaller in diameter that a local line is, the more sensitive it is to density increases. <p><u>Alternatives 1 and 2 – Sewer Connection and Service Charges</u></p> <ul style="list-style-type: none"> • The acceleration of the SIP projects could require increases to the connection charges and/or monthly sewer rates over and above the standard 2.5% and 3.3% per year, respectively 	<p>regulations may make it more feasible to decentralize treatment by possibly constructing a satellite treatment facility in some areas which could eliminate the need for some major trunk line projects.</p> <p><u>Alternatives 1 and 2 – Local Sewer Lines</u></p> <ul style="list-style-type: none"> • Local sewer lines could be upsized as part of development projects or proactive sewer line improvements as capital facilities planning and funding is aligned with the land use changes proposed by the Community Plan Updates. <p><u>Alternatives 1 and 2 – Sewer Connection and Service Charges</u></p> <ul style="list-style-type: none"> • Increases in connection charges will be paid by new residential, commercial, and industrial connections and do not impact the general sewer monthly rate. Annual sewer rate may increase over time and are reviewed and approved by Pierce County Council based upon the needs of the Division to pay for new projects, expansions, maintenance and operations of the WWTP and collection system and to meet the requirements of the WWTP’s NPDES permit.

Topic	Impacts	Mitigation Measures
3.4 Public Services and Utilities - Schools	<p><u>Common to All Alternatives</u></p> <ul style="list-style-type: none"> Growth is expected to occur under all four alternatives. School districts will need to plan to accommodate increased student populations. <p><u>Common to Alternatives 1 and 2</u></p> <ul style="list-style-type: none"> Alternative 1 and Alternative 2 allow for more multi-family housing units in the affected area <p><u>Common to Alternatives 1, 2, 3</u></p> <ul style="list-style-type: none"> Includes a rezone of RR and SF to MSF, which has the potential increase the density of single-family homes in portions of each of the community plan areas. Development may lead to a greater impact on schools since this form of housing has generated more students to date than other types of housing. 	<p><u>Common to All Alternatives</u></p> <ul style="list-style-type: none"> Impact fees from both single-family and multifamily housing development. Regular updates to school district capital facilities plans will continue to determine the level of service and future facility needs. The boundaries for schools within a district may be adjusted if needed. Districts plan for future expansion through property acquisition and new facility construction providing a way to plan for future school sites or expand existing sites to consider long-term growth. The Comprehensive Plan Capital Facilities Element policies encourage school districts to provide adequate school facilities concurrent with need, and encourage Pierce County to employ a variety of strategies to support school districts' ability to provide adequate school facilities, including, but not limited to, school impact fees, property dedication, school supportive zoning, and development phasing/timing or other project-specific mitigation. Comprehensive Plan Capital Facilities Element policies suggest that Pierce County, in coordination with school districts, establish a committee of school district representatives responsible for conducting a review of each school district's capital facilities plan and which may make recommendations to

Topic	Impacts	Mitigation Measures
3.4 Public Services and Utilities - Solid Waste	<p><u>Impacts Common to All Alternatives</u></p> <ul style="list-style-type: none"> All four alternatives will increase housing and population, causing an increase in demand for solid waste services. Alternatives 1, 2, and 3 will increase the demand more than Alternative 4 – No Action, with Alternative 2 causing the highest increase. Solid waste providers will need to augment equipment and personnel to accommodate increased demand. <p><u>Impacts Common to Alternatives 1,2, and 3</u></p> <ul style="list-style-type: none"> Alternatives 1, 2, and 3 will increase disposal at the County landfill and shorten the projected life of the landfill. Pierce County would need to plan for future landfill needs sooner. Alternatives 1, 2, and 3 will increase the demand more than Alternative 4 – No Action, with Alternative 2 causing the highest increase. Solid waste providers will need to augment equipment and personnel to accommodate increased demand. 	<p>the school district(s) and Pierce County on actions that may be taken in response to the projected deficiencies.</p> <p><u>Mitigation Measures Common to All Alternatives</u></p> <ul style="list-style-type: none"> Solid waste providers will need to adjust equipment, personnel, and rate structures to service additional customers. With the increase in multifamily units within the Centers and Corridors under Alternatives 1 and 2, providers will be able to service many more customers at single stops and reduce travel times and equipment replacement. With the adoption of the Community Plan Updates including Centers and Corridors and other zoning changes, Pierce County may be able to project future solid waste demands and plan for additional future landfill needs. Under all alternatives, Pierce County will continue to educate residents on the benefits of recycling and yard waste collection programs to reduce the waste stream and prolong the life of the landfill.
3.5 Air Quality	<p><u>Common to all Alternatives</u></p> <ul style="list-style-type: none"> The population is expected to increase in all four Community Plan areas. With changes to land use activity and increased population and traffic, the associated emissions may increase as well. In all four alternatives, PSCAA and Department of Ecology 	<ul style="list-style-type: none"> Puget Sound Clean Air Agency and the Department of Ecology are responsible for air quality in the affected area. As the regional authority, PSCAA will continue to implement its own policies and monitoring efforts

Topic	Impacts	Mitigation Measures
	<p>would continue to oversee emissions levels in the planning area.</p> <p><u>Alternative 2</u></p> <ul style="list-style-type: none"> Alternative 2 has the potential for the most significant impacts to air quality due to higher intensity of land use and increased traffic 	
<p>3.6 Surface Water, Groundwater, Flood Areas Wetlands, and Shorelines</p>	<p>Surface Water</p> <ul style="list-style-type: none"> Potential increase in vegetation removal and impervious area <p>Groundwater</p> <ul style="list-style-type: none"> Decrease in infiltration of water into the subsurface due to increases in impervious areas. Increase in water withdrawal due to increase demand for potable water <p>Wetlands</p> <ul style="list-style-type: none"> Impacts to wetlands due to increases or decreases in surface water runoff <p>Shorelines</p> <ul style="list-style-type: none"> Potential impacts to shoreline ecological functions <p>Flood Hazard</p> <ul style="list-style-type: none"> Potential impacts to land uses if built within flood hazard areas. 	<p>The following regulations mitigate potential impacts on surface water and ground water:</p> <ul style="list-style-type: none"> Pierce County Stormwater Management and Site Development Manual Chapter 18E.50 – Aquifer Recharge and Wellhead Protection Areas Title 18J – Development Regulations – Design Standards Tacoma-Pierce County Health Department – Onsite Sewage Regulations – Environmental Health Code, Chapter 3 Title 18A – Development Regulations – Zoning Tacoma-Pierce County Health Department, Environmental Health Code, Chapter 3 - Wells State Department of Ecology regulates water rights Water withdrawal is regulated by water rights. Water districts withdraw water according to their allocated water rights. National Pollutant Discharge Elimination System Municipal Phase I Stormwater Permit requires inter-jurisdictional coordination on stormwater management activities.

Topic	Impacts	Mitigation Measures
		<p>The following regulation mitigate potential impacts to wetlands:</p> <ul style="list-style-type: none"> Title 18E Development Regulations – Critical Areas <p>The following regulation mitigate potential impacts to shorelines</p> <ul style="list-style-type: none"> Title 18S Development Regulations – Shorelines <p>The following regulation mitigate potential impacts to flood hazard areas:</p> <ul style="list-style-type: none"> Chapter 18E.70 – Flood Hazard Areas Pierce County Stormwater Management and Site Development Manual
<p>3.7 Human Health and Community Well-Being</p>	<p>Human Health and Community Well-Being</p> <p><u>Impacts Common to Alternatives 1 and 2</u></p> <ul style="list-style-type: none"> Alternatives 1 and 2 would support increased human health and physical activity through urban planning and urban designs that would encourage activity and allow for reduced reliance on the automobile. <p><u>Impacts Common to Alternatives 3 and 4</u></p> <p>Alternatives 3 and 4 would not overtly support or promote human health and physical activity.</p> <p>Noise</p> <ul style="list-style-type: none"> Increased vehicular and transportation noise Temporary noise impacts from construction activities General increase in noise due to human and mechanical activity in developed areas 	<p>Human Health and Community Well-Being</p> <p><u>Mitigation Common to Alternatives 1 and 2</u></p> <p>The proposed changes in policy and land use designations proposed in Alternatives 1 and 2 will facilitate a land use design that will encourage physical activity through walkable communities and access to transit.</p> <p>Noise</p> <p><u>Mitigation Common to All Alternatives</u></p> <ul style="list-style-type: none"> Vehicular noise is regulated by local, State, and Federal regulations. Pierce County Code Chapter 8.72, Motor Vehicle, Public Disturbance, and Public Nuisance Noise. Chapter 8.72 place limits on vehicle operation noise. Pierce County Code Chapter 8.73 Noise Pollution Control regulates operating noise levels for land uses. The Code limits levels of

Topic	Impacts	Mitigation Measures
	<ul style="list-style-type: none"> • Areas of the Parkland-Spanaway-Midland Community Plan are impacted by noise from JBLM operations. <p>Risk of Explosion</p> <ul style="list-style-type: none"> • Construction activities could impact pipelines if easements and setbacks are not observed. • In the case of an earthquake, there could be many breaks along one or more of the pipelines during the same event. • Potential impacts from pipeline accidents on adjacent developed areas. <p>Toxic or Hazardous Materials</p> <ul style="list-style-type: none"> • Increase development and redevelopment will increase the risk of encountering old hazardous sites. • Increased potential for workers to be exposed to hazardous materials. 	<p>noise between more intensive and less intensive land uses.</p> <ul style="list-style-type: none"> • Many uses which generate noise require Conditional Use permits. Conditions of approval can limit noise levels, hours of operation and other measure to reduce • The County is working to provide homebuyers within the JBLM operations noise impact area, real estate disclosure notices to advise them of noise impacts. • Rezone proposals are located in existing areas of compatibility or conditional compatibility with JBLM and not located closer to JBLM or in higher noise contour areas. <p>Risk of Explosion <u>Mitigation Common to All Alternatives</u></p> <ul style="list-style-type: none"> • Maintenance of pipelines is regulated by State and Federal regulations • Enforcement of “Call before you Dig” requirements. • Observance of pipeline easements and setbacks for construction activities adjacent to pipelines. <p>Toxic or Hazardous Materials <u>Impacts Common to Alternatives</u></p> <ul style="list-style-type: none"> • Remediation of hazardous materials and sites will need to be done in accordance with State and Federal regulations • Workers involved in remediation activities will need to meet State and Federal requirements to prevent exposure. • Over time, remediation of hazardous materials sites will

Topic	Impacts	Mitigation Measures
		result from development and reduce the number of hazardous materials sites in the communities.

Topic	Impacts	Mitigation Measures
3.8 Housing	<p data-bbox="451 268 868 300"><u>Common to Alternatives 1 and 2</u></p> <ul data-bbox="495 310 946 888" style="list-style-type: none"> <li data-bbox="495 310 946 415">• Increased supply of housing improves overall housing affordability. <li data-bbox="495 426 946 646">• Increased variety of smaller home types, like apartments and townhomes, reduces housing price per unit compared to single-family homes. <li data-bbox="495 657 946 888">• Increased likelihood that, with greater housing supply overall, there may also be a greater supply of income-restricted affordable housing being produced. <p data-bbox="451 930 868 961"><u>Common to Alternatives 3 and 4</u></p> <ul data-bbox="495 972 946 1537" style="list-style-type: none"> <li data-bbox="495 972 946 1161">• Minimal effects on housing affordability; would not improve upon scarce supply of low-income housing or market-rate housing. <li data-bbox="495 1171 946 1360">• Single-family homes would continue to be produced, which tend to be less affordable than other housing types. <li data-bbox="495 1371 946 1537">• Minimal change to human health and community well-being resulting from existing high-living costs and housing instability. 	<p data-bbox="971 268 1388 300"><u>Common to Alternatives 1 and 2</u></p> <ul data-bbox="1015 310 1453 772" style="list-style-type: none"> <li data-bbox="1015 310 1453 499">• Increased permitted density for residential uses in Centers and Corridors zones supports greater housing supply and reduced housing costs. <li data-bbox="1015 510 1453 615">• Smaller residences and apartments provide natural affordability in the market. <li data-bbox="1015 625 1453 772">• Height and zoning bonuses would be provided through existing and potential future regulations.

Topic	Impacts	Mitigation Measures
3.9 Climate Change	<u>Common to All Alternatives</u> <ul style="list-style-type: none"> Minimal contributions to global greenhouse gas emissions and cumulative climate change through construction activities, building operations, and increased vehicle travel. 	<u>Common to All Alternatives</u> <ul style="list-style-type: none"> Alternatives 1 and 2 increase potential for high-density and mixed residential and commercial development that reduce driving and parking demand through walking, biking, and transit use. Alternatives 1 and 2 require provision of new pedestrian and bicycle infrastructure as part of new developments. Existing Commute Trip Reduction program reduces vehicle miles traveled. Minimum parking requirements accommodate parking in new development. Permitted development patterns that support future expansion of transit service and service areas. Proposed development regulations support future provision of bicycle and pedestrian facilities.

1.9 Significant Areas of Controversy and Uncertainty

The following are areas of possible controversy and uncertainty presented by the Community Plan Updates:

- Consistency of the Community Plan Updates and the Centers and Corridors proposal with Multicounty Planning Policies, particularly the Regional Growth Strategy;
- Impacts to the local and regional transportation and transit networks by locating additional growth in the Centers and Corridors, the Portland Avenue rezone, the Residential Resource/Single-Family to Moderate-Density Single-Family rezone, and other proposed zoning changes;
- Land use and property valuation impacts within Centers and Corridors;
- Timing of infrastructure with future growth;
- Impacts to school capacity and location of school facilities;
- Impacts to surface and groundwater resources; ~~and~~

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- Lack of improved north-south arterials and the need for transportation infrastructure that reflects community priorities;
 - Specific levels of growth that would be allowed;
 - Potential for dispersion of traffic outside of plan areas;
 - Inadequate parks and recreation to serve future growth;
 - Lack of adequate road and transit infrastructure to serve future growth and traffic;
 - Potential to shift growth from Regional Growth Centers into unincorporated Pierce County;
 - Inadequacy of existing impact fees to offset growth impacts;
 - Compatibility of proposal with Frederickson Manufacturing Industrial Center, Joint-Base Lewis McChord, and Mid-County Rural Separator area;
 - Potential for water source depletion and wastewater; and
 - Need for increased fire services and improved fire protection standards.

2 Alternatives

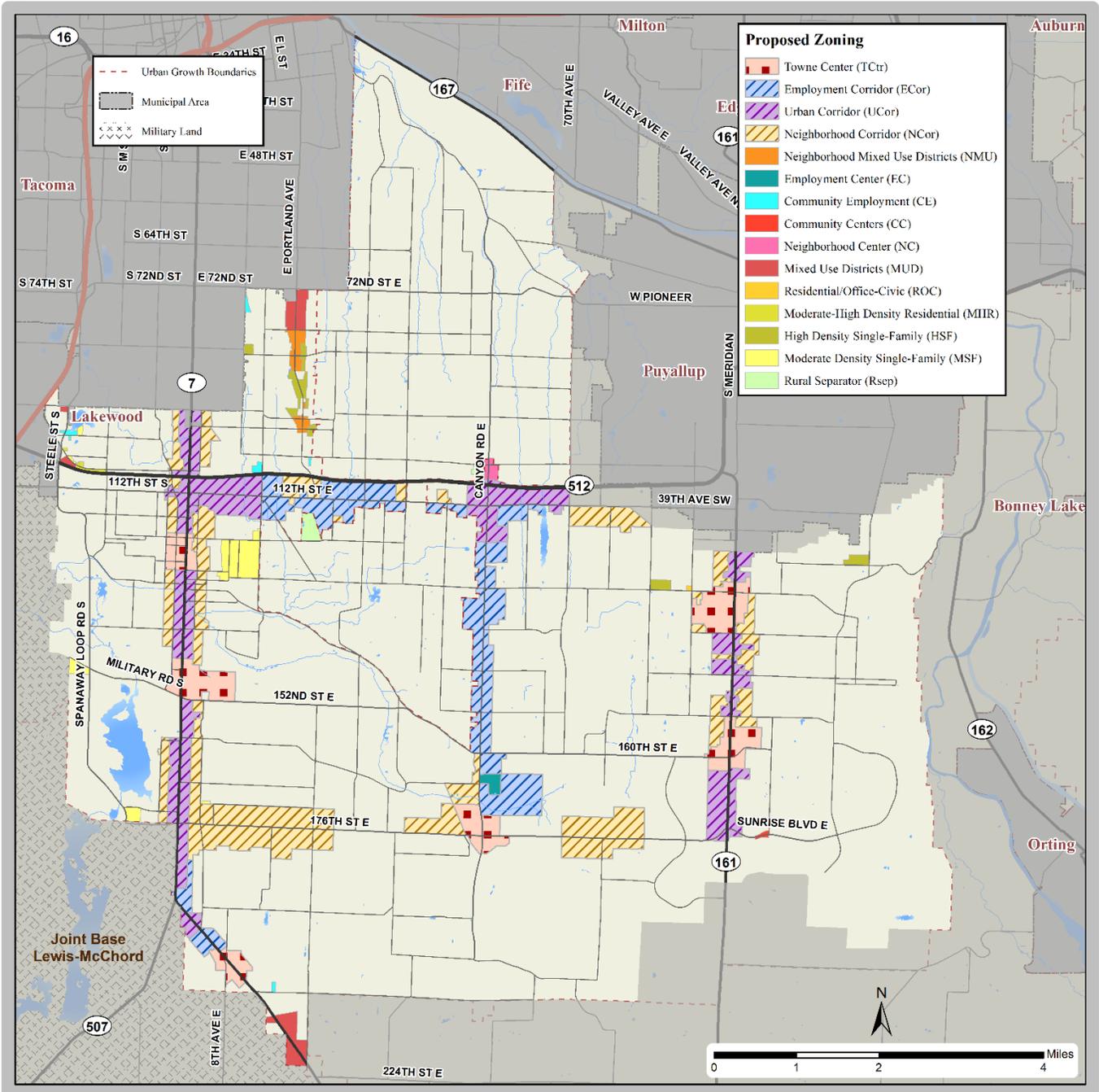
2.1 Introduction

This chapter provides a description of the No Action Alternative and three action alternatives, including the Proposed Action.

2.2 Alternative 1 - Proposed Action: Community Plan Updates

The Proposed Action includes updates to the text, policies, and maps for the Comprehensive Plan, the Frederickson, Mid-County, Parkland-Spanaway-Midland and South Hill Community Plans, and new policies related to zoning for Centers and Corridors. The Proposed Action also includes the land use designation and zone changes for each community plan as well as Centers and Corridors (which are describe in detail in Chapter 2.2). This alternative is distinguished by a less intensive land use proposal by using a Neighborhood Corridor designation in certain areas of the Centers and Corridors to provide a step down in density and height to surrounding single-family residential areas.

Figure 2-1 Alternative 1 Proposed Zoning



2.2.1 Centers and Corridors Rezone Component

Alternative 1 includes Comprehensive Plan policy and land use designations amendments in support of the Community Plan Updates with Centers and Corridors land use designations. The Comprehensive Plan amendments add additional policies in support of Centers and Corridors land use designations as well as designate locations for proposed Centers of Local Importance, for recognition through the Pierce County Countywide Planning Policies.

History

In the 2015 update to the Pierce County Comprehensive Plan, the County adopted policies to designate Centers/Central Places and Transit Oriented Corridors in order to create compact urban communities. These centers and corridors were to be designated during the community plan planning process. These policies established the framework for the centers and corridors to be designated and given appropriate zoning designations during the Community Plan update process

The four Community Plans also contain polices directing growth to mixed-use centers and along major transportation corridors. The Centers and Corridors framework is built upon the existing polices of the community plans. Similarly, the Centers and Corridors proposal builds on the existing land use pattern and designations and are generally located in the same areas.

Description

The Centers and Corridors proposal builds on the historic land use pattern and supports the development patterns described in the community plans. The Centers and Corridors designations plan for compact, high-density communities around Pacific Avenue (SR-7), 112th Street East, Meridian Avenue (SR-161), 176th Street East, and Canyon Road East.

The goals of the proposed Centers and Corridors designations include:

- Reduce development pressure on rural areas and single-family neighborhoods further from major transportation corridors;
- Create compact, high-density communities along major transportation corridors that support travel by walking and biking;
- Provide land uses and densities that would support and enhance transit service to and within the Centers and Corridors;
- Enhance economic development;
- Utilize existing infrastructure and prioritize future infrastructure investments; and
- Decrease the per capita costs of infrastructure by concentrating services and growth along major transportation corridors and serving more residents with existing and proposed improvements.

The new land use designations and zones are based on policies in the County’s Comprehensive Plan and the Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill Community Plans to focus and concentrate growth within the urban area for efficient utilization of public facilities. These centers and corridors zones are also supported by similar regional and countywide policies.

The proposal consists of two land use designations—Centers and Corridors—and three zone classifications: Towne Center (TCTR), Neighborhood Corridor (NCOR), and Urban Corridor (UCOR), shown in ~~Figure 2-2 Centers & Corridors Designations~~ **Figure 2-1 Alternative 1 Proposed Zoning**. Also

included is the Employment Corridor (ECOR) which is incorporated into the Centers and Corridors proposal; however, this zone is designated under the Employment Center land use designation to maintain its connection to the industrial areas of the County.

Towne Center. The Towne Center zone is intended to grow into well-designed central places with a diversity of activities and uses like high-density housing, businesses, entertainment, and services that are most easily accessed by walking. These centers are intended to support substantial growth for the unincorporated urban area, efficiently utilize existing infrastructure and services, co-locate residences and jobs, and provide opportunities for a vibrant multimodal transportation system. Highly urban forms and densities are encouraged. By increasing residential densities, Towne Centers will likely encourage residential growth. And while a wide variety of commercial and business-related uses are allowed, the Towne Center zone generally includes existing zones which allow very similar use types; thus, the zone is not expected to experience significantly more commercial growth than would occur under existing zoning.

Table 2-1 Towne Center General Land Use Characteristics

Minimum/Maximum Density	20 units per acre / <i>no maximum</i>
Permitted Uses	Multifamily housing, senior housing, civic, supportive utilities, offices, small to moderate-scale commercial and retail, cafes and restaurants
Maximum Height	65 feet ¹
Minimum Setbacks	<i>none</i>

¹Additional 20 feet in height allowed when providing 20% affordable housing

Urban Corridor. As with Towne Centers, the UCOR zone is intended to be developed with a mix of uses, including high-density residential, commercial, and civic uses. The UCOR zone will be located between Centers and oriented around major travel corridors for convenient access and high-quality pedestrian and bicycle facilities that connect to services. However, the UCOR zone will develop in a way that provides for more convenient access by automobile to cater to the greater urban area. By increasing residential densities, Urban Corridors will likely encourage residential growth. And while a wide variety of commercial and business-related uses are allowed, the Urban Corridor zone generally includes existing zones which allow very similar use types; thus, the zone is not expected to experience significantly more commercial growth than would occur under existing zoning.

Table 2-2 Urban Corridor General Land Use Characteristics

Minimum/Maximum Density	12 units per acre / <i>no maximum</i>
Permitted Uses	Multifamily housing, senior housing, civic, supportive utilities, offices, moderate- to large-scale commercial and retail, cafes and restaurants, vehicle sales, storage, pet kennels
Maximum Height	45 feet ¹
Minimum Setbacks	<i>none</i>

¹Additional 20 feet in height allowed when providing 20% affordable housing

Neighborhood Corridor. The Neighborhood Corridor zone is a lower intensity mixed-use zone intended to allow more neighborhood-scale development, and in some cases buffers Urban Corridor and/or Towne Center zones from single-family residential neighborhoods. The zone would provide multifamily housing, neighborhood commercial services, schools, and civic activities at a neighborhood scale. While this zone generally allows more commercial uses than is currently allowed, the scale, height, and type is limited; so, this zone is not expected to experience significantly more commercial growth than would occur under existing zoning in the community plan areas.

Table 2-3 Neighborhood Corridor General Land Use Characteristics

Minimum/Maximum Density	6 units per acre / 25 units per acre
Permitted Uses	Single-family housing, multifamily housing, senior housing, civic, supportive utilities, offices, small-scale commercial and retail, cafes and restaurants
Maximum Height	45 feet
Minimum Setbacks	none

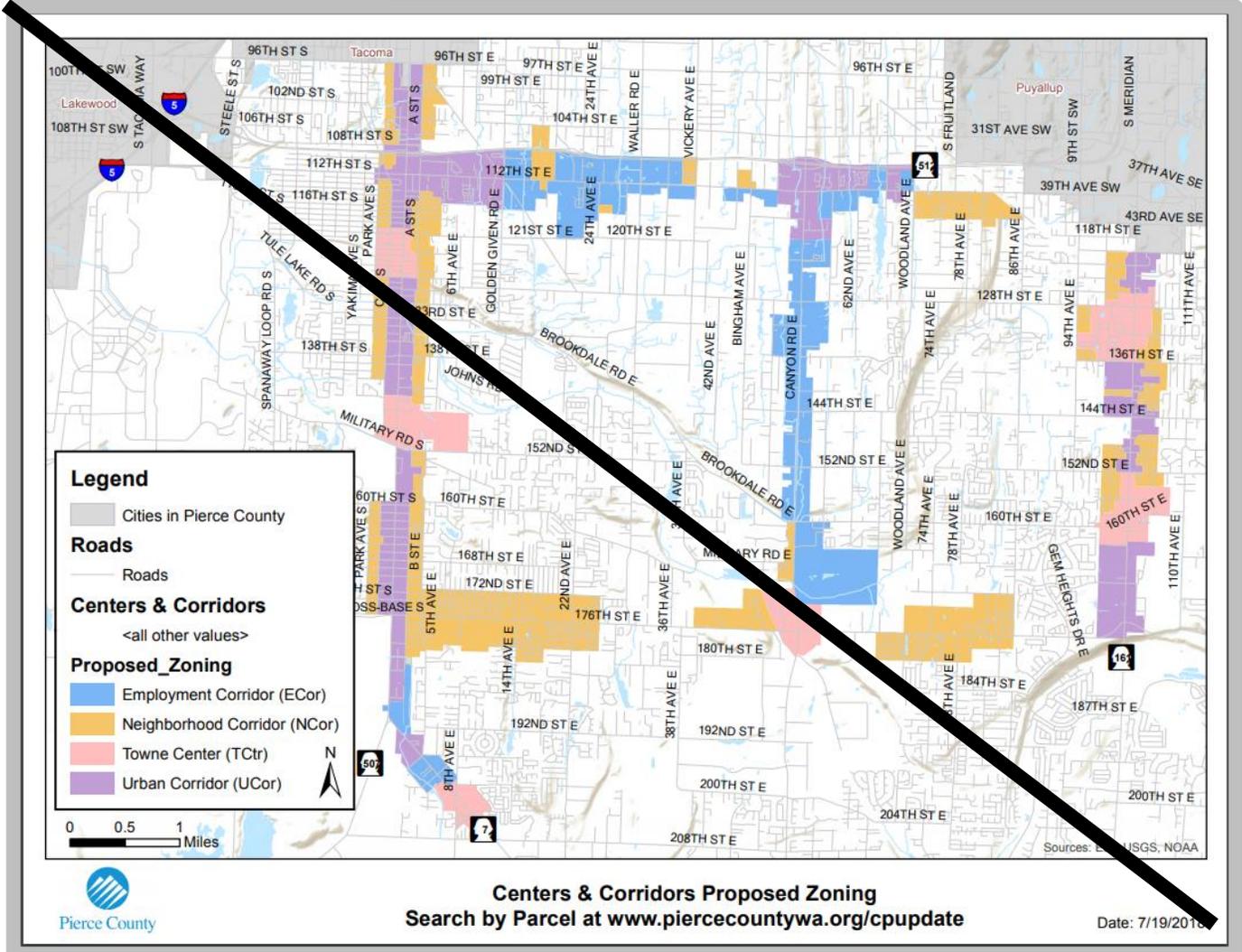
Employment Corridor. The Employment Corridor zone is intended to concentrate and encourage employment-oriented uses primarily around both Canyon Road and the 112th Street East corridor, and allows a mix of office and industrial uses. The Employment Corridor zone allows a wide variety of commercial, office, and moderate-industrial uses. However, this zone largely consolidates existing zones with similar uses and intensities as is allowed today; so, the zone is not expected to experience significantly more commercial growth than would normally occur under existing zoning.

Table 2-4 Employment Corridor General Land Use Characteristics

Minimum/Maximum Density	No new residential uses permitted
Permitted Uses	Civic, utilities, offices, agricultural businesses, commercial and retail, restaurants, moderate-intensity industrial
Maximum Height	65 feet
Minimum Setbacks	25 front arterial, 15 front non-arterial

~~Figure 2-2 Centers & Corridors Designations~~ Figure 2-1 Alternative 1 Proposed Zoning shows the designation of the areas along the major corridors with new land use designations and zoning. There are six Towne Centers generally connected by Urban Corridors. Alternative 1 is distinguished as less intensive as it includes a Neighborhood Corridor designation which is located in certain areas and provides either a step down in height and density from the Urban Corridor, or designates areas desired for higher density residential along the corridors particularly along 176th Street East. The Neighborhood Corridor designation provides a buffer and transition to single-family areas. Neighborhood Corridor allows for a maximum height of 45 feet and a maximum density of 25 units per acre, while the Urban Corridor allows for unlimited density and a maximum height of 45 feet with a 20-foot height bonus with the provision of affordable housing. The Employment Corridor is primarily located along Canyon Road and 112th Street East

Figure 2-2 Centers & Corridors Designations



This proposal provides the foundation for improving transportation options and making efficient and effective investments in infrastructure, which support and are supported by the new designations. Specific components include:

- Develop pedestrian and bicycle infrastructure throughout the Corridors connecting to Centers.
- Focus on ensuring efficient connections for all transport modes from residential areas to goods and services for everyday needs.
- Seek ways to serve the Centers and Corridors with short-interval local transit for shopping and commuter trips, and express service to regional connections, such as the Puyallup, Tacoma, and Lakewood transit stations.
- Focus infrastructure expenditures to support increased density and transit services within Centers and Corridors.
- Prioritize investment in infrastructure in Centers and then Corridors.

2.2.2 Community Plan Policy Updates Component

Frederickson

Land Use Element

- New Centers and Corridors zones (Towne Center, Neighborhood Corridor, Employment Corridor, Urban Corridor) added and zones that they replaced (Mixed Use District, Community Employment, Moderate-High Density Residential, Residential-Office-Civic, High Density Single Family, Employment Services) were removed.
- Added policies and background related to becoming a Potential Incorporation Area.
- Removed policies per LUAC request: related to other community plan areas, related to requiring Planned Development District for rezone request, related to removed zones, and related to airport overlay.
- Added policies related to new zones, multifamily housing should be in close proximity to transit and urban infrastructure should be provided and retaining the Regional Manufacturing/Industrial Center designation.
- Retain and amend policies currently in place for the Frederickson Towne Center related to adverse impacts to the Canyon Road East freight corridor.

Community Character & Design Element

- Removed list of entrances to the community.
- Removed reference to “curvilinear streets” and related to low impact development strategies that are now standard practice.
- Added policies related to fencing of residential land divisions and increased road widths for emergency vehicle access when parallel parking is allowed.
- Removed policies related to trees and landscaping that are now standard practice.
- Removed policies related to amortization period for billboards.

Economic Development Element

- Added content and policies related to Regional Manufacturing/Industrial Center designation.
- Updated policies to encourage expedited review of permits that will provide high economic benefit, especially related to jobs and industry.
- Added policies and goals related to becoming a Potential Incorporation Area.
- Incorporated policy related to serving the Frederickson community with Express Bus service connecting the community to regional transit stations in Tacoma and/or Puyallup.

Environment Element

- Removed policies related to native vegetation, tree conservation, impervious surfaces, wetlands, low impact development, and stormwater treatment where those policies have become standard practice.
- Removed policies related to studying Clover Creek, because studies have been completed and incorporated into Clover Creek Basin Plan and Clover Creek TMDL Alternative Plan.
- Remove policies related to transfer of development rights for wetlands, because that program, Wetland In-Lieu Fee Program, has been established for the Clover Creek basin.

Facilities & Services Element

- Removed Transportation related background and policies and moved to Chapter 7.
- Incorporated more language about community goal of providing more urban-level infrastructure to serve the community.
- Updated Parks and Recreation policies to reflect community desires and the latest Parks, Recreation, and Open Space Plan, Trails Plan, and adopted Park Impact Fee.

Transportation Element

- New chapter consisting of content and policies previously found in Chapter 6.
- Added goals for service standards, future improvements, and funding, as well as north-south road connections parallel to SR-161, Canyon Road East, and SR-7.
- Added a section of prioritized road improvements.
- Added policy to consider safe wildlife and pedestrian crossing on Canyon Road East.
- Added policy promoting ~~non-motorized access and pedestrian crossing in active transportation modes in~~ Centers and Corridors.
- Added policy for express bus service on Canyon Road East. Removed Implementing Actions that were completed or no longer applicable.

Mid-County

Land Use Element

- Added policy preserving the Rural Separator.
- Added policy prohibiting surface mining in ARL areas.
- Added policy to include high density residential within the Urban Corridor and Neighborhood Corridor, changing the previous primary use of HRD zone.
- Added policy designating the majority of commercial uses within the Urban Corridor.
- Removed policy regarding limited Neighborhood Corridor-NC expansion and adoption.
- Removed policy for a new Mixed Use District at 104th St E and Canyon Road E.

-
- Added policy on Centers and Corridors – including the Canyon Road East Corridor, 112th St East Corridor, Urban Corridor, Employment Corridor, and Neighborhood Corridor.
 - Added a short-term implementing action to preserve the rural separator.

Community Character & Design Element

- Added a section on Urban Commercial and Industrial.
- Removed policy to encourage narrower streets within neighborhoods.
- Removed policy regarding landscaping bonds.
- Added policy allowing for electronic reader board signs for civic uses.
- Added lighting design policy so that lighting in the rural areas should be limited to what is necessary for public safety.
- Replaced regulations on signs to allow electronic reader boards for civic uses in the Rural Separator zone.

Economic Development Element

- Removed policies creating compact neighborhood centers at specific intersections.
- Removed policy to work with private sector to create a redevelopment strategy for 112th St East.
- Removed policy regarding Estate Type Development.
- Removed short term and long term implementing actions.

Environment Element

- Removed policies reducing reliance on traditional conveyance and pond technologies.
- Removed policies about development techniques controlling stormwater.
- Updated policies on in-lieu fee for wetland mitigation program.
- Removed policies to retain or make buffers in natural areas.

Facilities & Services Element

- Removed Transportation related background and policies and moved to Chapter 7.
- Removed policy dictating the size of parks.
- Removed policy on Pederson Farm, surface mine reclamation sites, Faith Dairy, and Orangegate Park.
- Removed policy about funding for park maintenance, impact fees, and land dedication for parks.
- Removed high priority locations for parks and policy to provide subdivision parks in all new residential developments in urban areas.
- Removed policies providing incentives for bonus densities.
- Removed policy to develop an aquatic center in Franklin Pierce High School neighborhood.

-
- Added policy for sewer and wastewater treatment facilities to follow six-year Capital Facilities Plan and Sewer Improvement Plan.

Transportation Element

- New chapter consisting of content and policies previously found in Chapter 6
- Added policies recognizing Canyon Road East as a freight corridor and a need to improve access and vegetation along the road.
- Added a policy to provide sidewalks and consider reducing speed limits on roads without pedestrian facilities.
- Removed policy limiting sidewalks to major arterials and locations of schools and businesses.
- Added policy supporting extensions of service.

Parkland-Spanaway-Midland

Land Use Element

- Added Neighborhood Mixed Use (NMU) designation policies for the Portland Avenue area to provide for a mix of neighborhood-scale commercial and service uses and high-density residential uses.
- Removed the Commercial Mixed Use District, Office Mixed Use District, Residential-Office-Civic, and Research-Office zone policies.
- Added policy related to making nonconforming uses more compatible with existing and future conforming uses.
- Removed parking program policies.
- Added Employment Center designation policies to emphasize employment growth.
- Consolidated Moderate Density Single Family designation policies.

Community Character & Design Element

- Consolidated historic building policies.
- Updated the list of community entries.
- Added list of streets for streetscape improvement plans.
- Removed list of allowed uses in designated open space.
- Added policies on bringing signs into conformance with current standards.

Economic Development Element

- Updated commercial revitalization areas.
- Removed list of areas targeted for planned actions.

Environment Element

- Removed surface water policies about drainage courses and filling or modifying surface waters.

-
- Removed water policies related to spill response and wellhead protection signage.
 - Removed supplemental wetland restoration activity and incentive program policies.
 - Removed priority habitat, vegetation buffers for riparian areas/aquatic systems, and removal of material from stream policies.
 - Removed supplemental open space policies.

Facilities & Services Element

- Moved transportation policies to a new transportation element.
- Updated park impact fee policies.
- Removed park land dedication, regional park, park size, and specific park improvement policies.
- Added policies to prioritize sewer extensions and coordinate water purveyors.
- Removed policies about contamination protocols, discharge points, and stormwater pond adoption program.

South Hill

Land Use Element

- Added policies and background related to becoming a Potential Incorporation Area.
- Added a goal designating land use in the South Hill community to promote a mostly suburban, single family pattern and create growth along Meridian Avenue East.
- Removed policy to stop the expansion of the UGA.
- Added policy for Meridian Avenue to focus on pedestrian-oriented commercial in Centers, auto-oriented commercial in Corridors, and provide a mix of transportation options along the corridor.
- Removed policies regarding a market vacancy study.
- Added policy for small affordable housing to follow cottage design.
- Added policy designating two Towne Centers in the South Hill plan area (intersection of 128th Street East to 136th Street East, and between 152nd Street East and 160th Street East).
- Removed policy reshaping Centers along Meridian Avenue.
- Added policy expanding allowable uses within the Centers and Corridors and commercial zones.
- Added policy to integrate high density residential and commercial.
- Removed policy regarding nuisance abatement.
- Added policy for Towne Centers design, use, and transportation policies.
- Added policy designating a specific Urban Corridor on Meridian Avenue East and encouraging mixed use.
- Added policy characterizing the NCOR and addressing connectivity.
- Removed policy designating two or three areas for community commercial use.

-
- Removed policy detailing community commercial uses and policy that designates a central place as the focal point of commercial activity.
 - Added policy regarding zoning of properties in the ECOR near Thun Field, allowing the extension of the Community Center if 110th Avenue East is extended south of Sunrise Boulevard East in the future.

Community Character and Design Element

- Replaced references to “Urban Village” with new “Centers” zone.
- Added policy recognizing Heritage Park as being located within South Hill’s Community Plan area.
- Added policy related to sustainable site design and building practices.
- Added policy more specifically addressing setbacks.
- Added policy addressing open public space, adding a variety of housing types, and creating a community identity through design.
- Removed policies related to trees and landscaping.
- Removed policy addressing parking regulations.
- Removed policy addressing community groups’ participation in the community plans.

Economic Element

- Added a section identifying economic goals.
- Updated policies and mid-term actions to focus business promotion in Centers or Employment Centers rather than Urban Villages.

Environment Element

- Removed policies related to surface water and infrastructure to improve air quality (besides trees).

Facilities and Services Element

- Removed Transportation related background and policies and moved to Chapter 7.
- Added policy regarding crosswalk systems.
- Removed policies and action regarding the Master Plan of Pierce County airports.
- Removed policy outlining specific recreational needs of the community to create a more general use.
- Added policy to periodically review and update the County’s trail plan and trail network.
- Removed Horse Haven Creek Park and Trail, Ates Pond Park and Trail, Reservoir Park and Trail, and Half Dollar Park from the list of priorities of parks and added Horse Haven Creek Park instead.

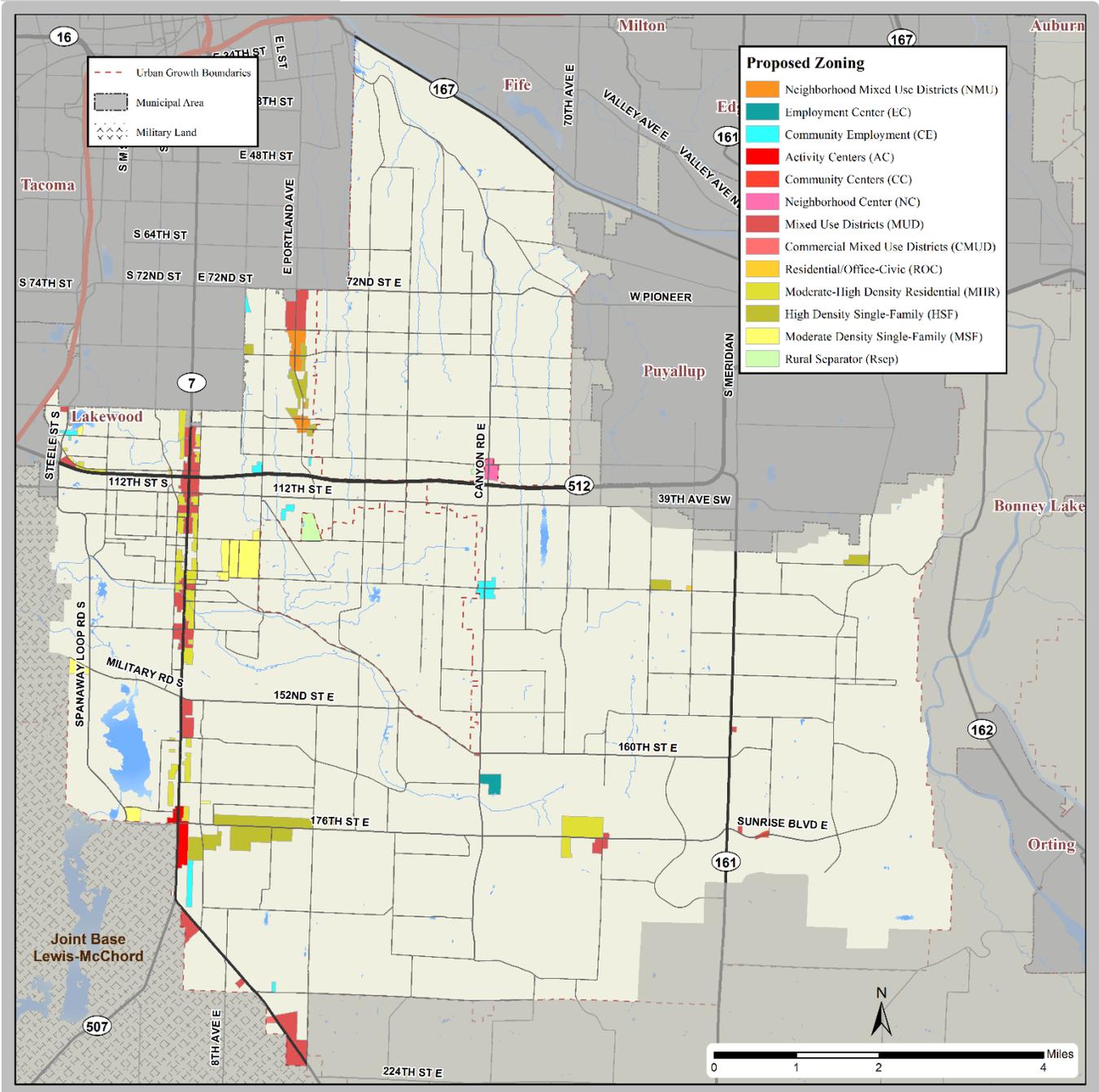
Transportation Element

- New chapter consisting of content and policies previously found in Chapter 6.
- Added information and policies to prioritize north-south corridors for increased circulation parallel to Meridian Avenue.
- Added a policy section detailing specific prioritized road improvements.
- Added policy regarding connectivity, wildlife crossing, and non-motorized access.
- Added an express bus service connecting Canyon Road East to Tacoma or Puyallup and additional policies to support transit within Centers and Corridors and connections to regional transit centers.

2.2.3 Requested Rezones Component

In addition to the Centers and Corridors designation/zoning changes, other land use designation and zoning changes are proposed as part of the Community Plan Updates and are a part of Alternative 1. These land use designation/zoning changes were proposed by the LUACs or by property owners and are listed in **Error! Reference source not found.** Figure 2-3 Figure 2-2 Map Change Requests. More details can be found in Appendix C: Map Change Requests.

Figure 2-3 Figure 2-2 Map Change Requests



Major rezones associated with these requests include:

- changing large areas of Single Family and Residential Resource zones to Moderate Density Single Family, and

A major substantive rezone associated with these requests involve changing properties along Portland Avenue to Mixed Use District, Neighborhood Mixed Use, and High-Density Single-Family zones, while allowing townhouses in the new HSF areas.

Table 2-5 LUAC Proposed Zone Changes

Community Plan Area	Description	Number of Acres
Mid-County	Canyon Rd E/104th St E: MUD/CC to NC	29.8
Mid-County	121st St E: MHR to RSep	43.1
Mid-County	104th St E: MUD to RSep	11.6
Parkland-Spanaway-Midland	Portland Avenue changes	203.5
Parkland-Spanaway-Midland	Code consolidation to eliminate CMUD, OMUD, RO, and ROC	145.5
Parkland-Spanaway-Midland	96th St S/Steele St S: MHR to MUD	4.3
Parkland-Spanaway-Midland	Sales Rd S: MSF to MHR	0.3
Parkland-Spanaway-Midland	Golden Given Rd E/SR-512: SF to CE	10.2

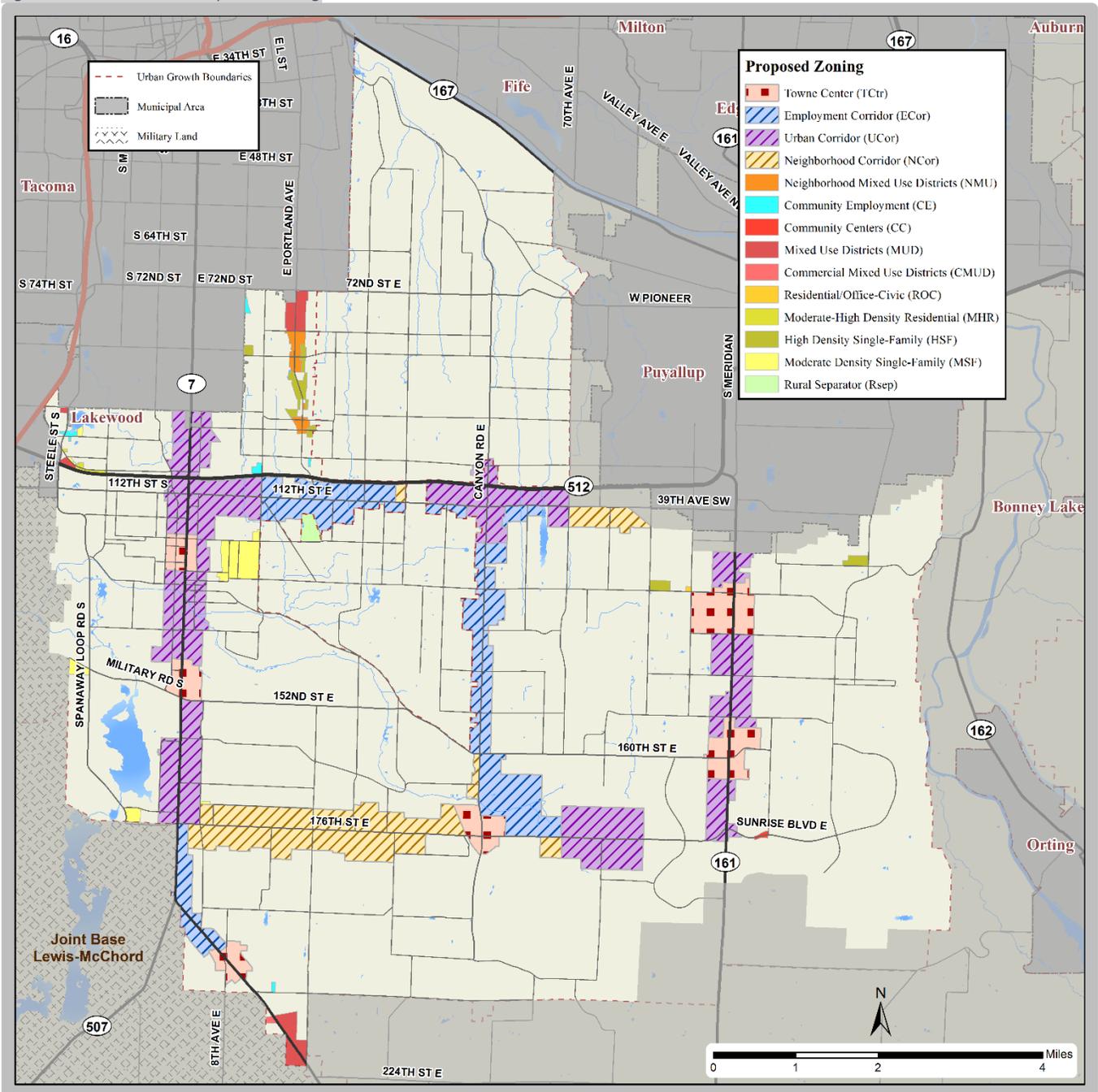
Table 2-6 Map Change Requests by Property Owners

Community Plan Area(s)	Description	Number of Acres
Frederickson	Canyon Rd E/Military Rd E: CE to EC	32.0
Frederickson	192nd St E: EC to MSF	41.0
Frederickson	176th St E: EC to TCTR	8.8
Frederickson	Within Corridors: RR/SF to MSF	715.3
Mid-County	Within Corridors: RR/SF to MSF	1,670.0
Parkland-Spanaway-Midland	Mountain Highway: MHR to MUD	6.3
Parkland-Spanaway-Midland	208th St E: MSF to CE	3.5
Parkland-Spanaway-Midland	19th Ave Ct E: SF to CE	2.1
Parkland-Spanaway-Midland	Within Corridors: RR/SF to MSF	1,119.842.5
South Hill	Sunrise Blvd E/110th Ave E: EC to CC	6.6
South Hill	128th St E/94th Ave E: HSF to ROC	2.6
South Hill	112nd St E/Shaw Rd E: MHR to HSF	22.6
South Hill	128th St E/86th Ave E: MSF to HSF	20.5
South Hill	Within Corridors: RR/SF to MSF	1,123.6

2.3 Alternative 2: Community Plan Updates with More Intensive Centers and Corridors

Alternative 2 includes all the elements of Alternative 1; however, Alternative 2 is more intensive in that it proposes the Urban Corridor zone for the entire width of the Corridor along Pacific Avenue (SR-7) and Meridian Avenue (SR-161) as well as extending the Neighborhood Corridor designation and designates a large area of Urban Corridor on 176th Street East as shown in **Figure 2-3 Alternative 2 Proposed Zoning**. Alternative 2 reflects residential development at a higher density and allows more auto-oriented commercial along the Corridors.

Figure 2-3 Alternative 2 Proposed Zoning



2.4 Alternative 3: Community Plan Updates without Centers and Corridors

Alternative 3 includes all the changes of Alternative 1 except the Centers and Corridors policy and zoning changes. This alternative would include all policy changes to the community plans and map change requests by the LUACs or property owners, but not those for Centers and Corridors. The land use designation and zoning change are shown in [Error! Reference source not found.](#) Figure 2-3 Figure 2-2 Map Change Requests.

2.5 Alternative 4: No Action

This proposal would maintain existing policies and zoning.

2.6 The Alternatives and the Environmental Analysis

Alternative 1 will be used to compare the impacts and mitigation measures between the alternatives. Generally, the impacts of Alternative 2 will be somewhat greater due to the potential for additional residential units. Likewise, Alternative 3 will have less impacts than Alternates 1 and 2, as it is based primarily on existing zoning with some map changes and density increases resulting from zone changes proposed by the LUACs and property owners.

2.7 Note on Level of Analysis

As the SEPA lead agency, Pierce County Planning & Public Works has prepared a non-project EIS to analyze impacts and determine and disclose any significant adverse environmental impacts. This non-project EIS is prepared under RCW 197-11-442 and RCW 42.21C.030 (2)(c). The Draft EIS discusses impacts and alternatives in the level of detail appropriate for the scope and level of planning of this non-project proposal. [WAC 197-11-442 (2), WAC 197-11-060(5) and WAC 197-11-776].

This DEIS describes the affected environment, potential impacts, and mitigation measures, in relation to the proposed action. The following elements have either been determined to not be significantly affected or to be beyond the scope of a non-project review:

- Traffic hazards
- Water, rail, and air traffic
- Historic and cultural preservation
- Agriculture
- Light and glare
- Infrastructure
 - Maintenance
 - Communications
- Earth
 - Geology
 - Soils
 - Topography
 - Unique physical features
 - Erosion/Accretion
- Plants and animals
 - Habitat, population, and diversity

-
- Unique species
 - Migration routes

3 Affected Environment, Impacts, Alternatives and Mitigation Measures, and Significant Unavoidable Adverse Impacts

3.3 Transportation

3.3.2 Impacts

Alternative 1

Alternative 1 is assumed to result in approximately 2,646 additional housing units beyond the 18,180 housing units expected by 2040 under current zoning. The following figure provides the distribution of those additional units for each TAZ.

Alternative 2

Alternative 2 is assumed to result in approximately 3,426 additional housing units beyond the 18,180 housing units expected by 2040 under current zoning. The following figure provides the distribution of those additional units for each TAZ.

Alternative 4

Alternative 4 reflects what would result by 2040 if no action were to be taken (namely adding 18,180 housing units to the existing 75,640 units and 29,206 jobs to the 66,163 existing jobs).

4 Comment Letters and Responses

This chapter of the Community Plan Updates Non-Project Final Environmental Impact Statement (FEIS) analyzes and responds to all comments received on the Draft Environmental Impact Statement (DEIS) and provides additional studies and modeling to evaluate probable impacts not adequately analyzed in the DEIS, including impacts related to Housing and Climate Change.

Twelve (12) letters with comments on the DEIS and the analysis of environmental impacts were received during the public comment period. Each letter is reproduced in this chapter. Comment letters/numbers appear in the margins of the comment letters and are cross-referenced to the corresponding responses. Responses are provided directly after each comment letter/email.

The following comment letters and emails on the DEIS were received:

- Letter 1 – Washington State Department of Transportation (WSDOT)
- Letter 2 – Tom Heinecke
- Letter 3 – Tom Heinecke
- Letter 4 – City of Puyallup
- Letter 5 – Metro Parks Tacoma
- Letter 6 – Roxy Giddings
- Letter 7 – Summit Waller Community Association
- Letter 8 – Tacoma-Pierce County Health Department
- Letter 9 – City of Tacoma
- Letter 10 – Bethel School District
- Letter 11 – Futurewise
- Letter 12 – Central Pierce Fire & Rescue



**Washington State
Department of Transportation**

Olympic Region
5720 Capitol Boulevard, Tumwater
P.O. Box 47440
Olympia, WA 98504-7440
360-357-2600 / FAX: 360-357-2601
TTY: 1-800-833-6388
www.wsdot.wa.gov

May 20, 2019

Mr. Jeffrey D. Mann
Senior Planner
Pierce County Planning & Public Works Department
2401 South 35th Street, Suite 2
Tacoma, WA 98409

RE: Non-Project Draft EIS Community Plan Updates

Dear Mr. Mann:

Thank you for allowing the Olympic Region of the Washington State Department of Transportation (WSDOT) the opportunity to review and comment on the Non-Project Draft Environmental Impact Statement (EIS) Community Plan Update for Fredrickson, Mid-County, Parkland-Spanaway-Midland and South Hill. We appreciate the opportunity to review and provide comments on the document.

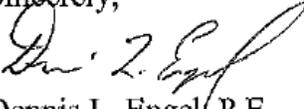
1 We are aware of Pierce County's plans for growth and development in regards to the community plan updates, particularly for Centers & Corridor Proposed Zoning. We also applaud the County's support of active transportation measures.

2 WSDOT is concerned with mitigating Level of Service (LOS) traffic impacts for the proposed zoning alternatives. Both SR 7 and SR 161 are designated Highways of Statewide Significance (HSS) where Regional Transportation Planning Organizations set the LOS threshold. The Puget Sound Regional Council Metropolitan Planning Organization adopted a Tier 1 LOS E mitigated threshold within the cities of Tacoma and Puyallup, and a Tier 2 LOS D threshold for areas south of the cities. State Route 512 is also an HSS with a LOS D Urban threshold. WSDOT would like the
3 opportunity to review and comment on specific development impacts as they are processed through the State Environmental Protection Act (SEPA).

Mr. Mann
May 20, 2019
Page 2

Again, we thank you for the opportunity to review and comment on the Draft EIS. If you have any questions please contact me at (360) 357-2651 or by email at engeld@wsdot.wa.gov

Sincerely,



Dennis L. Engel, P.E.
Multimodal Planning Manager

DE:yl
FS

cc: Ike Nwankwo, Commerce
Anne Fritzel, Commerce
Michael Hubner, PSRC

Response to Washington State Department of Transportation (Letter 1)

Comment 1

Comment noted.

Comment 2

The DEIS measured Level of Service (LOS) consistent with the Highway Capacity Manual and applied Puget Sound Regional Council (PSRC) adopted LOS standards for all regionally and statewide significant highways. For example, LOS standard "D" is applied to SR-7, SR-512, and SR-161. The proposed zoning alternatives do not trigger new LOS failures beyond those already identified within the No Action Alternative, as the DEIS found that the alternatives would contribute about 3-4 percent more traffic to certain County roadways and State highways in the study area.

In Section 3.3.3 of the DEIS, mitigation measures related to traffic impacts were identified. Considering the minor impacts and incorporated mitigation measures, the DEIS determined there to be no significant unavoidable traffic impacts.

Comment 3

The comment is noted. In response, the following change (as highlighted) is made to DEIS Section 3.3.3 to further reduce any potential impacts resulting from the alternatives:

Future development that occurs under the proposed development regulations would be subject to Traffic Impact Fees that support roadway capacity improvements. As appropriate, Pierce County Planning and Public Works shall provide the Washington State Department of Transportation the opportunity to review and comment on specific future developments that may affect traffic on State Routes 7, 161, and 512 as part of the SEPA review process.

Please consider this email as our formal comments on the DEIS for the Community Plan Updates, specifically the Mid-County plan. First of all, thank you for the April 13, 2019 Open House held at the Pierce County Skills Center. As you know, it was well attended and quite informative.

The zoning change request for the land between 128th St E, 62nd Ave, and 136th St East and Woodland Avenue should not be approved. Our rationale is two-fold and based upon Figure 3-37, Figure 2-3, Figure 3-20, Figure 3-22 and the lack of sanitary sewer system for any engineered drainage systems in the area.

#1. – Existing land use constraints in designated wetlands; inaccurate reference maps. Figure 3-37 is not accurate. It does not show the completion some time ago of a large housing development located 136th Street East to Woodland that has dramatically reduced the once existing and documented wetlands along 136th.

Much of the undeveloped land between 128th, 62nd, 136th and Woodland is a Designated Wetland Area. Drainage is by small streams and primarily infiltration. The area is underwater or wet eight to nine months of the year. The large housing developments West of Woodland and South of 136th has degraded the wetland size and quality that once existed. To propose a change from the current 1 to 3 homes per acre to 4 to 6 housing units does not reflect current land use constraints that are already recognized by Pierce County.

#2. As property owners in this area, we question “owner requests” for rezoning. Figure 2-3 Map Change Request: This figure shows requests for a zoning change from Residential Resource (RR) to Moderate Density Single-Family (MSF). This change request shows our two-lot short plat of nearly eight acres (our home on one acre at 6323 132nd St East and the adjoining 6+ acres of undeveloped land that we also own) within this request area. At the April 13 open house, I asked staff how the figure 2.3 came to be and was told that it represents “land owners requests for such change, and that Figure 2.3 was based on nothing else.” We own acreage within the area, as described. We were not

asked about nor did we request this zoning change. We would like to know how many property owners within this proposed MSF area actually contacted Pierce County with their request to change the land use designation.. We expect that we are not the only property owners that did not request this change. **Please provide us with a list of the properties that made such a request.**

We appreciate the opportunity to make comments and share our concerns.

Please confirm through email that you received our comments and that they have been incorporated into your review process.

Tom and Franclyn Heinecke
6323 132nd St East
Puyallup, WA 98373
253.531.0933

Erik Jaszewski

From: thfh1579 <thfh1579@comcast.net>
Sent: Thursday, May 16, 2019 8:59 AM
To: Erik Jaszewski
Subject: Re: DEIS Comments - Mid-County Plan proposed updates

I attended the May 14, 2019 Mid-County Advisory Commission meeting, and would like to add these comment to the record.

Again, my name is Tom Heinecke. My wife and I live at 6323 132nd St east, 98373-8244 and have for the last 30 years. We own almost 8 acres, presently zoned RR. We were aware of the WELANDS, Fish and Wildlife resource value, and open space character when we bought the land. We strongly agree with Pierce County staff's recommendations to not change the present RR zoning to Moderate Density Single Family. The present RR zoning is compatible with the unique open space character and environmental sensitivity, and large wetland areas existing. To make such a change based on one person's request (and not as a specific land owner) makes no sense, given the known land constraints.

Please keep the zoning at RR.

Tom Heinecke

Response to Heinecke (Letters 2 and 3)

All Comments

The comments are noted and the detailed concerns regarding the Community Plan Updates proposal are appreciated. DEIS comments, including those pertaining to specifics of the Proposed Action Alternative 1, have been incorporated into the public comment record and will be considered by the Pierce County Council in their decision on the final action.

The alternatives presented in the DEIS only represent a range of possible actions that may be taken by Pierce County and do not commit the County to any specific course of action regarding specific proposals. The final action could result in fewer rezones than presented in the DEIS. In such a case, the EIS would remain adequate so long as it continues to encompass the probable environmental effects of the final action.

The specific proposal addressed in the comment (i.e. rezoning areas around 6323 132nd Street E from Residential Resource to Moderate-Density Single Family) has been removed from all alternatives that are analyzed in the Environmental Impact Statement.

The remaining comments do not materially address issues presented in the DEIS and no additional response is provided.



City of Puyallup

Development Services Department
333 South Meridian • Puyallup, Washington • 98371

May 20, 2019

Mr. Erik Jaszewski
Pierce County Planning & Public Works
2401 South 35th St., Suite 2
Tacoma, WA 98409

Subject: Pierce County Community Plan Updates – Draft Environmental Impact Statement

Dear Mr. Jaszewski,

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement for the Pierce County Community Plan Updates and Centers and Corridors Proposal. This is a project of potential significance and direct effects to the City of Puyallup and we appreciate the ability to provide input throughout this process. To that extent, we have the following comments.

- 1 The City generally supports the efforts to take a centers approach in focusing the growth that is occurring and is anticipated to continue in the County's Urban Growth Area. We are particularly interested in the South Hill Community Plan update and its potential impacts and benefits to the City. We anticipate that by focusing this growth into centers and corridors, this proposal could lead to increased transit viability and economic development, which would in turn result in these community plan areas being more likely to incorporate or annex. However, we also recognize that growth in this area is likely to have direct impacts to the Puyallup's infrastructure, particularly our transportation, stormwater, and parks systems.

In keeping with our May 2018 scoping comments, the City has identified some areas of comment related to the level of analysis completed in this draft EIS.

Transportation:

- 2
- The DEIS states, "So the impacts on specific roadway segments are only intended to provide a general snapshot of how growth resulting from the alternatives might affect the roadway system in the community plan areas". We are concerned that under that approach, the DEIS only offers general, high-level aspirational mitigation measures, without clear data to validate their effectiveness.
 - In the City's May 2018 scoping letter, we asked about the housing and employment assumptions to be used for the EIS analysis. However, it appears that there are no assumptions

3
4
5

of greater employment generation in any of the analyzed alternatives. A key factor in the transportation analysis should include the actual likely job generation associated with proposed commercial and/or mixed-use development in the centers, given an underlying assumption that those future jobs will serve nearby residents, thus systemically addressing cumulative job-housing trip generation imbalances. While this may be true, we would also expect that a sizable number of South Hill residents, including commuters in these newly-accommodated centers, will continue to access highways and transit to points north and west, thus impacting Puyallup's roads. Without any clear analysis of likely employment growth, it would seem that the resultant potential transportation impacts have been under-analyzed in the DEIS.

- Our earlier letter requested specific analysis of impacts to Puyallup roadways and intersections from increased unincorporated trips. This remains an area of concern as it seems the DEIS only analyzed impacts to County roads and intersections.
- The DEIS acknowledges that various key future transportation projects would be funded through Traffic Impact Fees. Is there a documented finding that expected County TIF collection will adequately fund these proposed projects or will additional funding sources be allocated?

Stormwater:

6

- We did not see a clear acknowledgement of the potential of increased surface flows from the South Hill Community Plan area on the City of Puyallup stormwater system.
- The EIS notes that some regional facilities have the capacity to accommodate future development. Based on the mitigation measures, which generally anticipate compliance with existing regulations, does that finding imply that stormwater would be handled on-site for any projects exceeding the capacity of regional facilities?

Parks and Recreation:

7

- The South Hill Plan area has a similar land area and population as the City of Puyallup, but less than half as much park space as the City. It is anticipated that many of the residents of South Hill patronize City parks, facilities and events, adding to their necessary upkeep, while not financially contributing to them. The DEIS should identify a more robust mitigation approach to address this situation, beyond simply "continue to update the (county) PROS plan."

Thank you for your coordination with the City on this DEIS and for consideration of these comments.

Sincerely,

Thomas C. Utterback
Development Services Director

Cc: Kevin Yamamoto, City Manager
Hans Hunger, City Engineer
Katie Baker, Senior Planner

Response to City of Puyallup (Letter 4)

Comment 1

Comment noted.

Comment 2

The Non-Project DEIS presented a general analysis of the alternatives and accordingly, provided general mitigation measures consistent with WAC 197-11-442. This high-level analysis was appropriate as the Community Plan Updates DEIS was prepared as a non-project EIS under Phased Review per WAC 197-11-060(5) and WAC 197-11-776, which provide lead agencies the ability to cover general matters in broader environmental documents with subsequent narrower documents concentrating solely on the issues specific to the later analysis. Furthermore, WAC 197-11-443(2) specifies that “a nonproject proposal may be approved based on an EIS assessing its *broad* impacts” (emphasis added). Future projects that may arise with respect to the Community Plan Updates non-project proposal will be subject to appropriate review under the State Environmental Policy Act (SEPA).

Comment 3

In Section 3.3.2 page 94, the DEIS stated:

The action alternatives would allow a greater mix of non-residential land uses, so some added commercial and employment growth is expected beyond what would occur under existing development regulations. However, this increment of increased job growth that may result from the action alternatives has not been estimated because it is not expected to differ substantially from job[sic] normal job growth under existing zoning. Further, even an increase would likely fall within the margin of error of 2040 estimates. Furthermore, adding more jobs in the community plan areas would likely lessen the extent of traffic impacts presented here as fewer total commute miles would be traveled and more discretionary trips could be made by walking or biking to nearby businesses.

Based on this approach, and consistent with non-project environmental impact statements assessing impacts broadly, the analysis of transportation impacts was adequate and considers the potential for employment generation resulting from the alternatives.

Comment 4

The Non-Project DEIS presented a general analysis of probable impacts consistent with WAC 197-11-442. This high-level analysis was appropriate as the Community Plan Updates DEIS was prepared as a non-project EIS under Phased Review per WAC 197-11-060(5) and WAC 197-11-776, which allows lead agencies the ability to cover general matters in broader environmental documents with

subsequent narrower documents concentrating solely on the issues specific to the later analysis. Furthermore, WAC 197-11-443(2) specifies that “a nonproject proposal may be approved based on an EIS assessing its *broad* impacts” (emphasis added). Future projects that may arise with respect to the Community Plan Updates non-project proposal will be subject to appropriate review under the State Environmental Policy Act (SEPA).

As such, the traffic analysis presented in the DEIS was correspondingly broad. Further, it would be unreasonable to make assumptions of probable impacts on the City of Puyallup’s roadways due to the uncertain nature of zoning and development. However, with the EIS having been prepared as the first part of a phased SEPA review, future project-level environmental analysis will be necessary. It is through this future review that any probable traffic impacts, including those that may affect the City of Puyallup’s roadway system, will be analyzed as appropriate.

Comment 5

The future roadway projects presented in the DEIS Table 3-14 on page 91 would be funded by Traffic Impact Fees (TIF) to an extent. The remaining costs would likely be paid by the County or through other funding sources.

Comment 6

The DEIS stated that the alternatives may result in some increased surface water runoff and potential impacts to stormwater facilities. In addition to Pierce County facilities, the City of Puyallup’s stormwater facilities may experience stormwater runoff from developments south of the 120th Street East/47th Avenue East corridor. However, any potential impacts on Puyallup’s stormwater facilities that may result, regardless of whether those facilities maintain enough capacity to handle the runoff, would continue to be mitigated by the measures listed in Section 3.6.1 on pages 167-168. In addition, Pierce County is required, as part of its National Pollutant Discharge Elimination System (NPDES) Municipal Phase I Stormwater Permit, to address stormwater runoff impacts comprehensively and in coordination with other jurisdictions. Therefore, no significant and unavoidable adverse impacts related to stormwater are anticipated on the City of Puyallup’s stormwater facilities.

Comment 7

It is reasonable to assume that some future South Hill residents will utilize Puyallup’s city parks, as it is also reasonable to assume that Puyallup residents will use Pierce County parks. While the DEIS did not speculate on this matter, it was determined that the impacts of future growth would be mitigated through the Pierce County Parks and Recreation Department’s ongoing activities to improve and expand their park system. In early 2020, Pierce County adopted an update to the Parks, Recreation, and Open Space (PROS) Plan, with multiple fully-funded parks projects serving the South Hill community being built in the next 10 years. Within the next 10 years, the PROS Plan lays out a strategy to complete park and trail improvements totaling more than 8 miles of trails and

improvements to more than 100 acres of parks in the South Region (the area including South Hill), including expansion of turf ballfields. If more growth than is anticipated takes place during this time, additional parks projects may be possible.

Those improved and expanded parks and recreation facilities in Pierce County would be available not only to future residents of South Hill, but also to residents of the City of Puyallup.



May 20, 2019

Honorable Bruce Dammeier, Pierce County Executive
City County Building
930 Tacoma Avenue South, Room 737
Tacoma, WA 98402-2100

RE: Pierce County Community Plan and Draft Environmental Impact Statement (EIS)

Dear Executive Dammeier,

Metro Parks Tacoma (MPT) would like to take the opportunity to comment on Pierce County's updated Community Plans, specifically the Parkland-Spanaway-Midland Community Plan as it pertains to an area that may be annexable to the City of Tacoma in the future.

MPT operates the parks system for the majority of the City of Tacoma and when annexation occurs and new areas become part of the City that area automatically becomes part of MPT's service jurisdiction.

1 Via the District's 2018 Strategic Master Plan, MPT adopted a commitment to attain 100% 10-minute Level of Service (LOS), meaning that every resident of Tacoma will be within a 10-minute walk to any park or facility owned and operated by MPT. At this time, MPT has achieved a 69% LOS for Tacoma and is actively pursuing opportunities throughout the District to increase coverage. In order to hold the District accountable for this goal, the MPT Board of Park Commissioners adopted a key performance indicator of achieving a 90% coverage by the year 2023. This LOS is consistent with what it takes for a heavily urban community to be walkable and livable. Additionally the City is equally committed to their own LOS by adhering to a 20 minute neighborhood, planning to assure that residents have access to routes and transit that bring all amenities necessary to daily life within 20 minutes of their neighborhoods. Through these LOSs MPT and COT are equally committed to providing walkable, livable, and safe neighborhoods across Tacoma. It is the belief of both parties that these proposed County community plans should be equally conscious of making livable neighborhoods in light of the massive expected urban growth to occur in these areas.

2 MPT echoes similar concerns as the City of Tacoma related to proposed upzones in the commercial corridors of these communities. While this area is likely to continue on a high trajectory of residents moving into the area, the ground work for this expansive urban growth will exacerbate multiple issues. If the plans are adopted and growth occurs as outlined in these plans, which is noted to be understated by the City of Tacoma, there will likely be far greater pollution issues as local aquifers will be harmed by the growth in the commercial corridor along route 7 and air quality will further deteriorate due to increased congestion along routes 512 and 7 thus harming designated open spaces and diminishing quality of life.

↓ The plan acknowledges that residential growth in the area has exceeded previous expectations and due to

Board of Park Commissioners: Jessie K. Baines Jr., Erik Hanberg, Aaron Pointer, Tim Reid, Andrea Smith
Executive Director: Shon Sylvia

4702 S. 19th Street, Tacoma WA 98405-1175
Phone: (253) 305-1000 • Fax: (253) 759-2986 • MetroParksTacoma.org

3↑ the increased density much of the available open space has decreased or been harmed by the growth, but the proposed plan will not solve these problems.

MPT is dually concerned about this plans future impacts on our LOS. At this time the Parkland-Spanaway-Midland communities has 365 acres total of designated Parks and Recreation space as identified by Pierce County, but this land is primarily centered around the Sprinker Recreation Center and Spanaway Park, and the residual parcels are small in size and are inequitably distributed throughout this community.

The current updated community plan acknowledges this inequitable spread of parks and recreation spaces and makes recommendations that any growth occurring in the communities should also make a plan to designate park space that can be maintained in perpetuity. We appreciate this effort to secure park land for the foreseeable future for communities, but are curious how often this noncommittal recommendation will be followed through. We suggest the County develop a more thorough funding strategy and fleshed out requirements for incorporating parks and open space into heavily dense urban environments. To ensure that residential areas receive the parks that they will want, we would propose the County make policy recommendations to codify these suggestions and assure that expansive growth does not trump resident's

4 access to parks.

While we applaud Pierce County's attempt to give consideration to equitable distribution of park space to their community. The report identifies seven different areas where Pierce County Parks & Recreation should focus their attention for the acquisition of park land, these areas are centered on the proposed upzone areas of the community plan. However, Pierce County's park and recreation LOS is guided by density of communities, where as MPT's LOS is conversely focused on a resident's distance and access to a park facility. These two LOS approaches conflict one another, which draws major concern from MPT in regard to future annexation. We strongly encourage that Pierce County gives consideration to MPT's LOS in areas likely to be annexed into Tacoma, otherwise MPT's commitment to assuring all residents are within a 10-minute walk to a park or facility would be compromised.

MPT acknowledges the difficulty of acquiring and operating park space in heavily built urban environments. We wish to continue working with Pierce County collaboratively to assure that all residents receive equitable distribution of park space in their neighborhoods, and would like to participate in future planning efforts alongside Pierce County to secure park space for our shared communities in accordance with each of our LOS goals.

Sincerely,



Shon Sylvia
Executive Director
Metro Parks Tacoma

Board of Park Commissioners: Jessie K. Baines Jr., Erik Hanberg, Aaron Pointer, Tim Reid, Andrea Smith
Executive Director: Shon Sylvia

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Response to Metro Parks Tacoma (Letter 5)

Comment 1

The comment is noted, but the comment is not specific enough to respond to.

Comment 2

The comment relating to impacts on local aquifers, air quality, and traffic congestion is premised on the statement that the growth forecasted in the DEIS is understated. To clarify what was stated in the DEIS, primarily in Section 3.3.2, the total growth expected by 2040 under existing zoning is 13,950 housing units; the DEIS considered that growth (i.e. No Action Alternative) and the added growth that is expected to result from the action alternatives (e.g. 3,426 housing units for Alternative 2). The potential impacts on aquifers, air quality, and traffic were analyzed in the DEIS according to this method.

It should be noted that this total amount of combined growth only reflects that which may occur in the 20-year horizon period; it is acknowledged that more growth is possible beyond that planning timeframe, but to incorporate such an estimate would be highly speculative and, therefore, inappropriate for assessing probable impacts as required by SEPA (WAC 197-11-060(4)(a)).

The DEIS analysis relating to local aquifers (Chapter 3.6), air quality (Chapter 3.5), and traffic (Chapter 3.3) is adequate. Generally, a non-project legislative zoning action has no immediate or measurable environmental consequences.¹ This non-project EIS appropriately specifies alternatives and evaluates environmental effects at a relatively broad level consistent with WAC 197-11-442 and WAC 197-11-443(2). More detailed project-level environmental review will occur as appropriate for future projects.

Comment 3

The comment is noted, but the comment is not specific enough to respond to. The DEIS analyzed probable impacts on Parks and Recreation in Section 3.4.2.

Comment 4

The following change (as highlighted) is made to DEIS Section 3.4.2 Mitigation Measures to further reduce any potential impacts resulting from the alternatives:

Beyond impact fees and the county general fund, Parks and Recreation funding includes a parks sales tax, real estate excise tax, motor vehicle fuel tax, and grants. **In 2020, Pierce County adopted an updated Parks, Recreation, and Open Space (PROS) Plan. This Plan**

¹ *Ullock v. Bremerton*, 17 Wn.App. 573, 581, 565 P.2d 1179 (1977).

includes several major parks capacity improvements in the Parkland-Spanaway-Midland Communities Plan area, as well as funding for acquisition of at least one new park to serve the Plan area. The Plan also includes improvements to more than 365 acres of parks and expansions of the trail system by at least eight miles in the Central Region (the area that includes Tacoma’s Urban Growth Area).

The PROS Plan addressed those areas that currently have high-density zoning, as well as identified the potential need for adaptive management should the zoning updates under consideration be adopted.

Pierce County Parks is a regional park system whose level of service was adopted by the Pierce County Council in 2016, which is based on investment per capita. If the City of Tacoma chooses to annex Pierce County parks, Pierce County would support such annexation, along with the application of alternative level of service standards. At any time, regardless of annexation or incorporation, residents in Pierce County can vote to create a parks district, as other areas of Pierce County have done in recent years (Peninsula Metropolitan Park District, Key Peninsula Metropolitan Park District). Like Metro Parks, these districts set their own level of service and develop a funding model to achieve that level of service. Should residents of unincorporated Pierce County opt for such a district, Pierce County would support their efforts. It will be key for Planning and Public Works and Parks and Recreation to continue to coordinate to meet the needs of Pierce County residents.

*3 versions
short one is
on the last 2 pages*

PIERCE COUNTY PLANNING
& LAND SERVICES

MAY 20 2019

Centers and Corridor Zoning Draft

May 20, 2019 Response to Non-project Draft EIS

Pierce County Community Plans

Roxy Giddings 12211 C St. S. Parkland WA, 98444-5118 *RJ*

The following is a description of the “Town Center” in the Parkland community area of unincorporated Pierce County in Washington State.

Various residential housing types separated by a mature landscape of native and exotic trees, shrubs, and ground covers. Landscaping includes local artist sculptures and water features with view corridors and open space all within a park like setting. There are hired grounds keepers. There is a large community garden and a green house. Parking spaces (1,473 so far), walking paths, trails, sidewalks and ramps include Americans with disabilities Act accommodations. Local bus service, car and van rental service is available. Gifts and purchases of property have allowed regular expansion of the footprint into the surrounding properties. Plans are in the works for renewal of old facilities within the existing footprint. All buildings have sprinkler and fire alarm systems. There are electric vehicle charging stations. All recent projects are constructed to LEED standards with water and energy conservation required.

Sanitary sewers, power & water are sufficient now and into the future. All stormwater is treated and returned to the ground, including what comes off the public roads. Interior vehicular traffic is limited to delivery and safety needs. Composting and Recycling services are convenient. Thrift store shopping opportunities for circulation of reusable items such as electronics and clothing are available on site. Security personnel are on duty working with local law enforcement, the local fire department and with emergency management staff. Theaters, auditoriums, art galleries, concert halls, recreational activities, fitness facilities, academic programs and libraries are all available for the local residents and for the surrounding community. There are many short term and temporary jobs. The town center of Parkland has hundreds of stable family wage jobs. This is, of course, taken from Pacific Lutheran University’s Master Plan and personal experience.

There are some things that an “up dated” community plan could add that would enhance our existing Town Center:

The mostly moderate-density neighborhood surrounding the town center should provide more law enforcement personnel who in turn could enforce county parking codes by educating young drivers concerning parking distance from signs, intersections, and driveways, and by enforcing speed limits and noise laws. Now that the Activity Center has been implemented, a study should be made as to how well the traffic is working for the businesses along and around Garfield Street noting especially what has happened with the zero lot-line/parking-in-the-rear design that was chosen back in the day.

It would help the town center if the neighbors maintain the reliability and stability of the small community atmosphere. It should be a place where professional and blue-collar workers can raise their families. Support for schools is paramount and that goes both ways, college students work in the community schools and the schools work with the college. And voters pay enough taxes to support the public schools

Neighbors can sponsor regular work parties and show pride in the area for themselves and for the many local and international visitors coming to our town center. The county can continue to sponsor “shred days” and “clean-up days.” We can continue to come together for Safe Streets “night out,” Emergency Management skills training, and school functions. Precinct Committee Officers can supply information for and teach the importance of voting in every election. We provide welcoming places such as, houses of worship, home grown restaurants, trees and green spaces among homes where children can grow up without “nature deficit disorder” (it is real) and where elders can enjoy living out their lives in the calm atmosphere of the old community of Parkland.

The Parkland part of the 2002 Community Plan allowed for and has received a steady influx of population growth and can continue to do so without completely dividing the community with a half mile wide swath of high-density housing along Pacific Avenue and along 112th Street. The Activity Center portion of the 2002 plan in Parkland called for retaining the businesses along Pacific Avenue without displacing the people who are directly behind those businesses. **The properties in the new expanded so called “Towne Center” are presently occupied. There is no room for this high-density zoning.**

The first reason the county planners gave at the start of the process for the need for the Centers & Corridors plan was to make room for the 60,000 people we have to absorb into the entire County as proposed by the 2040 Plan of the Puget Sound Regional Council. PSRC claims that the plan is flexible as to where and how this growth is to be achieved. The PSRC is responsible for distribution of money for road projects but seems to have taken on the task of telling their four counties how to enact the Growth Management Act. Pierce county’s response to the PSRC in the urban growth area is to displace the existing property owners and create centers such as the one called “Towne Center” made up of Multi-family High-Density High Rise (up to 85’ if...) units. And to make high-density residential corridors along 112th Street South and East of A Street to Puyallup at Meridian, from the Puyallup city boundary at Meridian to 176th St. East, from 176th St. East westerly to Pacific Avenue South. The Pacific Avenue (SR7) South corridor is from the Tacoma City boundary to the Wall Mart.

Also, along with the 60,000 new people, we have to help the almost 2,000 homeless in Pierce County by putting low-income and tax-incentified subsidized housing units in these densified centers and corridors. The people that make up the established community have to pay for the subsidies to the developers when we add ladder trucks (helicopters?) for fire protection, the sheriff needs about 70 officers for our area right

now. We will need to rip up the streets to expand the sewer lines and storm drains. The Parkland area has all electrical wiring underground which will have to be moved and replaced for each project. Rents do go down if there is a glut in the housing supply.

Another reason for the need, given only recently to the community, is to make rental units which will then make a demand for Rapid Transit. The RT will replace an already well used Route 1 along Pacific Ave. with an Enhanced Route. The Enhanced Route will reduce by half the existing bus stops on this line. The transit needs in the urban growth areas are for East/West routes. The new rapid transit will cause riders to walk farther and cross more streets to catch a bus. What we also need right now is busses that run earlier and later in the day. There should at the very least be routes on 176th, Portland Avenue, Spanaway Loop Road, Canyon and Frederickson to bring some level of service required by the GMA in an Urban Growth area.

Community Plans have tried several times to create an area in Parkland that would become a town core. Because Garfield Street had some components the community did use, and because the buildings were old and interesting, the proposed core was around the two block street between Park Ave. and Pacific Ave. Over the years we saw the loss of a large grocery store, two flower shops, a full sized theater (now replaced by a pharmacy), a sewing and vacuum repair shop, a barbershop, a bank, a quilt shop, an office supply store, a Scandinavian shop, private homes, and our greatest loss, the public grade school just to name a few. Some additions to our community, which we did not have before and I personally do not need now, are alcohol sales, tattoo parlors, tanning beds, hair and nail shops, several franchised eating establishments and a 106 unit high-rise apartment. We do have at least three dentists' offices and some nice eating places, a bus transit center and a very busy long established United States Post Office. And, of course, we have PLU. **After 58 years of living in Parkland I can safely say we do not want nor will we support a "Towne Center" as it is proposed and presented to us.**

The original 2002 Activity Center includes business and commercial properties in a narrow band along Pacific Avenue South between 121st St. South and 127th St. South. The four blocks between 121st St. South and 122nd St. South on Park Avenue and on C St South over to Pacific Avenue.

We thought this Activity Center made sense because it kept the business property owners in a zone that allowed them to continue their businesses. That zoning worked and many of the businesses on each side of SR7 are still there today but only a couple on Garfield St. Garfield Street itself is very busy as was planned.

The existing stable community will quickly dissolve in and around the corridors and centers if the county rezones the single family homes out of existence. The threat of "up" and "down" zoning causes stress and sleepless nights for those in the path of or within sight of such zoning. So the threat has a far greater impact than the "half mile wide" corridor zone. At the April 13th open house, put on by PPW for the four areas where these zones are proposed, the people with the Dennis Hanberg letter were talking about

the possible affects on their property. Some of the remarks I heard were: “Am I in it?” and “Oh, No!” or “Thank God I’m not in it!” with an occasional “Good, now I know, so I’m going to sell and get out” or “Good, I’ll develop my property.”

The run on the homes has already begun as our mailboxes fill and our phones ring with proposals to buy the properties in and around the centers and corridors proposal. The realtors keep up with Pierce County Planning and are already acting as if the this plan is in effect.

In any case, the disruption to the community is profound. There are still many who do not know the meaning of the proposed zone changes. They do know what “height” means. The letters sent (some got a corrected letter and some got another still not corrected letter) do not explain “set-backs, zero lot-line, step-down, mean, minimum lot width may be reduced by multiplying the lot area by 0.007, (that is my personal favorite foot note), AC, CC, HS, MHR, NCOR, NMU, TCTR, UCOR” or the constant changes of these letters and meanings over the years.

For instance, the first meeting I remember of the massive rezoning proposed in the four sub-area plans was designed just to inform the members of the four LUACs (now the ACs). I attended some of the Parkland Spanaway Midland meetings so I heard about and went to the joint meeting. When I saw the zoning map for my home, and hundreds of other homes, was changed from being **next to** the “Activity Center” to being **in** the Activity Center, I had to sit down abruptly. I was in shock and nauseated. I knew what that meant. I was on both the 1980 and 2002 planning committees that were formed to create the last two PSM land use plans. The original 2002 Activity Center has allowed a multi-storied 106 unit apartment to be built just a few hundred feet from my home. I can see the windows of that building in my backyard. It has an negative impact on me that people in that building can watch me without my knowing it.

Since that joint meeting of the four LUACs I have gone to many more PSM meetings and watched as most of the people appointed to the committee (if they come) have been unable to keep up or catch up with the things the PPS has put before them. They are expected to learn what Residential Density and Urban Lot Dimensions mean, in the context of their sub-area plan, without ever knowing what the original sub-area plans were designed to do.

This new proposal completely changes the original community sub-area plans with extreme new and differing types of zoning proposals. The impact of the present zoning into such an extreme change is not conducive to good zoning anywhere in the area.

In Parkland the main change is through the middle of the present plan along a newly invented transportation corridor. Desolate islands of single family home neighborhoods are trapped between the corridors, within the corridors and around the outside of the corridors. There are other increased density zoning changes beside the Centers and Corridors that are going to surprise residents. Saying that a range of housing can be in a

zone but only allowing a permit for the maximum number to be built is just one example of the present situation.

Over the years the county has allowed changes to the original plan that the citizens drawing up the land use maps could not anticipate. The citizens committee in Parkland had no idea what a “lot of record” meant to the planning department. In Parkland our lots are 25’ wide (east/west) and 100’ long (north/south). The East/West streets are 200’ apart. In the first 130 years of development in Parkland at least two of the lots were combined. No one built homes on a 25’ wide lot. When the county allowed 15’ wide by 60’ deep (I am guessing 60’) two story houses on 25’ by 100’ lots along 112th street we got a double shock because the houses were only 10’ apart. The front yard is paved for parking. We also had no idea a duplex would be two stories high with four bedrooms on each side and two single garages inside. The concern is for the environment especially impervious surfaces that block the recharge of our sole source aquifer.

This plan leaves no room for human or any other life to enjoy living in our area. There are no far reaching plans for clean air, clean water, or the ability to maintain but one isolated piece of the original prairie oak land which is the Parkland heritage. This proposal does not allow for sub-area plans. This proposal dissolves the sub-area plans the communities made. Communities need time and help to develop new plans. The option for “no change” is the best option until we can make the new sub-area plans. At least people can enjoy the homes they occupy now without being hounded by speculators that persuade the county planners to waste their and our time on one big hair-brained idea designed to overwhelm the folks in their communities. The changes to Midland’s zoning was made at the request a couple of builder-developers. The people in Midland have come together and said no to the zoning proposed along Portland Avenue. Their area has the least services of all the four plans. No bus, no police, not fully sewerred, tons of traffic, constant fights with the county over enforcement of wetlands laws. A moratorium should be put on building in Midland.

May 20, 2019 Response to Non-project Draft EIS
Pierce County Community Plans

Roxy Giddings 12211 C St. S. Parkland WA 98444-5118

It is not evident to the public that planners in Pierce County understand all the elements and goals of the Growth Management Act, especially when it comes to protecting the natural environment or the integrity of the sub-area community plans.

Centers and Corridors, Mixed Use, and Higher Densities do not address the larger and expensive problems that come with destruction of the water supply in our sole source aquifer. The watershed itself is damaged by impervious surfaces from polluted runoff that enters creeks and storm drains. That water does not return clean to the ground to replenish our drinking water supply. We must design a way to protect our water supply.

It should be noted here that ever since the power point presentation of the “essentially a City of Pierce” was first brought to my attention Pierce County has moved forward as if that concept is, or will be shortly, a done deal. References are made in government documents throughout the county to the more accurately named “Centers and Corridors”.

The new name for the Activity Center in Parkland is Towne Center. (Emphasis is mine to point out the snobbery of such a word. It does not fit our community. If Towne is used then Centre should be used). It is not a Town and it is not a Center. (The center of Parkland is 112th St. South at Pacific Avenue) Looking at all the centers as they have been designated, Parkland may have the most family homes going into the newest Pierce County Zone. The new proposed zoning changes doubles the size of the original AC and creates hundreds of properties in what will essentially be a new “Non-Compliance Strip Zone.”

At the time the sub-area Community plan was created strip zoning was to be avoided, so we allowed the creation of an Activity Center”. The AC was supposed to be a design that would ‘enhance the activity’, which was Pacific Lutheran University. What we got was removal of several local owner run businesses, empty store fronts, and an outsized apartment. The Activity Center should go away. Pacific Lutheran University is our Town Center.

The corridors skew even more homes into the Non-Compliance Strip Zone. Pierce County will loose thousands of dollars in fees by making these “free” zoning changes. The ugly, view-blocking Corridors should go away. Single-family zones should have as much power to exist as any other zones.

The lack of room for things that make a place livable (like trees, shrubs, flowers and sunshine) is a primary concern and so all the set-backs must be increased and the “O” lot-lines must be thrown out.

Street trees are not enough, especially when they are not native to the Pacific Coast west of the Cascades. We are in a race to save the pollinators. We must incorporate natural systems into all the plans. To me, that means protection for every pothole, a large setback for riparian habitat for every body of water and creek and stream. It means no building on steep banks, or near wetlands. It must protect all the Gerry Oak trees and also the dogwoods and the yews and other plants, animals and birds that are native in our area. We are in the Pacific Flyway and we should point that out in every proposal that comes before the county.

Continuing to allow septic systems over our sole source aquifer is a crime and against federal law and a danger to our health and safety. Especially in Spanaway, drawing down the water supply should not be allowed where septic tanks and private wells are in use. Building must stop where water is not available.

Developments are already out of compliance with the Level of Services, and the utilities need to match with the “concurrence” wording of the GMA. All buildings should be built LEED standard for conservation, with solar roofs, skylights, easy recycling system and lots of insulation to name a few. The outside must be ready for extreme weather stresses that have already started to affect our area, and will get worse for at the least the next 50+ years.

Planning to put miles and miles of high-rise housing beside busy state highways and county roads and displacing hundreds of home owners in the process sounds like a desperate idea in search of an excuse to follow a non-existing mandate for a strip-zone. The whole thing is ridiculous. We should still call it “Essentially A City of Pierce”.

Response to Giddings (Letter 6)

All Comments

The comments are noted and the concerns regarding the Community Plan Updates proposal are appreciated. DEIS comments, including those pertaining to specifics of the Proposed Action Alternative 1, have been incorporated into the public comment record and will be considered by the Pierce County Council in their decision on the final action.

The alternatives presented in the DEIS only represent a range of possible actions that may be taken by Pierce County and do not commit the County to any specific course of action regarding specific proposals. The final action could result in fewer rezones than presented in the DEIS. In such a case, the EIS would remain adequate so long as it continues to encompass the probable environmental effects of the final action.

The remaining comments do not materially address issues presented in the DEIS or are not specific enough to respond to, thus so no additional response is provided.

Summit–Waller Community Association

Since 1993

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Puyallup, WA 98373

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May 15, 2019

Community Plan Updates and Center and Corridors Draft EIS

Pierce County Planning and Public Works

2401 South 35th Street

Tacoma, WA 98409

jeff.mann@piercecountywa.gov

Re: Comments on the Draft Environmental Impact Statement for the Community Plan Updates and Centers and Corridors

Dear Mr. Mann,

Thank you for providing the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the Community Plan Updates and Centers and Corridors.

The Summit-Waller community is located in unincorporated Pierce County between the growing cities of Tacoma and Puyallup. The community exists as a “rural separator” which is defined by its one-of-a-kind land use zoning specifying a minimum of 2 ½ acre residential building lot sizes. Despite the community’s rural nature, residents measure travel time to highways in minutes. Many citizens are happy to live within Pierce County’s Rural Separator (RSep) as evidenced by the community’s long-standing support and effort in creating the land use designation. The RSep also improves the quality of life of many citizens living across Pierce County by separating and buffering the urban intensities of Tacoma, Puyallup, and Fife. As stated in our EIS scoping comment letter, we recognize that no specific proposed changes to the rural separator are proposed. However, we continue to have concerns regarding indirect and cumulative effects to our community that must be addressed in the analysis. Many of these concerns were expressed in our EIS scoping comment letter but do not appear to be included in the DEIS.

The Summit-Waller Community Association (SWCA) has reviewed the State Environmental Policy Act (SEPA) Draft EIS, Determination of Significance, Draft Mid-County Community Plan, and open house materials. We recognize that many of our concerns may have already been expressed by many other citizens and interest groups in the area. However, we want to submit our comments on the DEIS as part of the official record.

Indirect and Cumulative Effects

When describing the environmental impacts of a proposal, SEPA requires agencies to consider direct, indirect and cumulative impacts. Impacts can be temporary, such as the short-term impacts associated with the construction phase of a proposal, or permanent, such as the long-term impact of increased runoff and contamination from a widened roadway. Both should be considered when identifying significant adverse environmental impacts to be analyzed in the EIS.

1

↑ Nonproject review allows agencies to consider the “big picture” by conducting comprehensive analysis, addressing cumulative impacts, possible alternatives, and mitigation measures. If the nonproject action is a comprehensive plan or similar proposal that will govern future project development, the probable impacts need to be considered of the future development that would be allowed. For example, environmental analysis of a zone designation should analyze the likely impacts of the development allowed within that zone.

SEPA also requires that cumulative effects be considered in an EIS (WAC 197-11-792). Although SEPA does not specifically define “cumulative effects”, the term is defined under the National Environmental Policy Act (NEPA) as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.” (40 CFR 1508.7).

- 1 The DEIS appears to lack any and all analysis of indirect and cumulative effects, not only within the immediate vicinity of the proposed zone changes, but to neighboring communities such as Summit-Waller. We feel that this is a substantive inadequacy of the DEIS. We strongly recommend taking another look at the impacts analysis and including full disclosure of any and all potential indirect and cumulative effects.

With the proposed Centers and Corridors Plan (the Plan), Pierce County proposes to change zoning along 112th Street between Pacific Avenue and State Route (SR) 512 as well as along Canyon Road between SR 512 and 176th Street East. There is also consideration of changing zoning along Portland Avenue between 72nd Street East and 100th Street East. We understand that the Plan does not specifically propose changes to the RSep or the boundary but is intended to encourage higher densities along the fringes of the boundary. This will bring more people and services closer to the RSep thus placing more pressure on the community for future development. Future development adjacent to the RSep boundaries may result in indirect and cumulative impacts to the community. Please address the following specific concerns in the indirect and cumulative impacts analysis.

Traffic

- 2 Increased zoning density and services closer to and along the RSep boundary will potentially increase traffic throughout the area because of those who wish to divert around highly congested corridors (such as Pacific Avenue, Canyon Road and 176th Street). Portland Avenue, Waller Road, Vickery Avenue, Woodland Avenue and Fruitland Avenue are already used during peak travel times causing a decrease in level of service and safety along the community’s vital arterial roads.

Specifically, for Canyon Road, it is intended to be a freight connection from the Port of Tacoma to Frederickson. It is not meant to be similar to Meridian which has some of the worst congestion in the area causing people to use other north/south streets as previously mentioned. Please include indirect and cumulative analysis of traffic impacts in and around the RSep in the EIS.

Land Use

3 Because the communities of Summit-Waller, North Collins Clover Creek and Summit View strive to emphasize and preserve the rural area within the community, the single prevailing category of land use within the Mid-County area is residential. This results in lower intensity rural uses as compared with the neighboring cities of Tacoma, Puyallup and Fife. The RSep allows Pierce County to separate the County's major urban intensifications with a low intensity separator to prevent the creation of large city mega-sprawl. With the exploding population of Pierce County, affordable and quality housing is becoming highly sought-after. It is preferred that the land use remain as it is, with infilling within city boundaries, to continue to provide for good quality and rural housing options for Pierce County residents. But with increased densities and intensities along its borders, as proposed in the Plan, it is feared that the rural landscape of the area is at risk and affordable housing options would be reduced. Please include indirect and cumulative analysis of land use impacts in and around the RSep in the EIS.

Water Resources/Aquifers

5 The Summit Water Company supplies most of the water used by Summit-Waller residents. The Summit system is state-of-art, with a distribution system designed and constructed to serve lower density uses, rather than high density urban uses. The Summit Water Company currently provides potable water to their customers from ground water sources only via nine wells from underground aquifers located in the Clover-Chambers and Puyallup River basins. The DEIS states that there is no impact to drinking water supplies yet it also states that all alternatives may increase effective impervious area with potential impacts to groundwater and surface quantity and quality. These affect drinking water supplies. Please include indirect and cumulative analysis of drinking water and aquifer impacts in and around the RSep in the EIS.

Environmental Health and Hazards

6 Pierce County already has some of the worst wood smoke particulate matter problem in the country. Fine particular matter, also known as PM 2.5, is an air pollutant known to cause asthma attacks, strokes, heart attacks, and cancer. Parts of Tacoma/Pierce County, including the tide flats, southeast Tacoma, Puyallup valley, and Summit-Waller are now recategorized as a maintenance area for PM 2.5. Still, the DEIS does not appear to include any analysis of potential indirect or cumulative impacts to areas such as Summit-Waller. Please include indirect and cumulative analysis of air quality in and around the RSep in the EIS.

Wildlife and Habitat

7 One of Pierce County's first salmon restoration projects is located within the RSep at Swan Creek. Today, the largest private commercial fish hatchery in Pierce County is located within the RSep at Clear Creek near Pioneer Way. The Puyallup Tribe's salmon hatchery is also located within the RSep at Diru Creek near Pioneer Way which results in the release of several million chum salmon annually. The Puyallup Tribe's Salmon, Steelhead and Bull Trout Report for the Puyallup/White River Watershed (2014-2015) indicates that in Swan Creek, coho and chum salmon and cutthroat trout are known to spawn in relatively strong numbers. Similarly, the report identifies chum, and a few coho salmon utilizing Squally Creek to the southeast. Even further east at Clear Creek, Chinook, chum, and steelhead salmon have been observed utilizing the stream. Canyon Creek supports several salmon species but chum

salmon are the only species observed spawning in significant numbers. Rody Creek, a tributary to Clarks Creek primarily supports chum and coho salmon.

The numbers of salmon in area creeks demonstrate that a balance or equilibrium has been reached between the natural environment and the Summit-Waller Community. This balance is important and Puyallup Tribal Fishery biologists have identified water quality and quantity as a major concern in preserving the salmon resource yet the DEIS is completely void of potential impacts to these resources. Please include fish and wildlife habitat in the analysis in the EIS not just within the Summit-Waller area, but within the entire Mid-County area.

Alternatives

The SWCA has reviewed the proposed action and EIS alternatives. We support the proposed alternative EXCEPT for the policies and zoning changes from Residential Resource (RR)/Single Family (SF) zones to Moderate Density Single Family (MSF) in all four communities but *specifically* between 112th St East, Canyon Road East, 160th St East and Woodland Ave for the following reasons:

- The vision statement for the South Hill community plan includes “A locale where residential and business developments are integrated into the natural environment.” The vision statement for the Mid-County community plan includes “A unique residential community that separates urban densities with rural development and environmentally sensitive areas. The RR/SF to MSF proposal seems to counter both vision statements.
- In the community plan it states “Future high-density residential...will focus within urban areas on the 112th Street East and Canyon Road East Corridors.”. The RR/SF to MSF proposal extends well beyond those streets.
- MSF is an urban designation that should remain along those urban-like corridors and not extend beyond in order to meet the land use goals of the draft community plans.
- The South Hill community already has MSF designation as the prevailing land use designation throughout South Hill (currently 53% of South Hill is MSF). The existing area zoned as Single Family (SF) is key to provide a much-needed transition between RR and RSep to retain and protect the unique characteristics of the RSep in the North Collins Clover Creek/Summit View communities full of vital and extensive water and wetland resources.
- Sensitive areas in the proposed rezone area include extensive ground and surface water resources such as Woodland Creek, Diru Creek, Clover Creek and a sole source aquifer where most residents of the Mid-County area rely on groundwater as their potable water source. The RR/SF to MSF proposal would impact those sensitive areas even if the mitigation measures were implemented.
- Because the community has consistently identified the importance of the reduction of overall development and implementation of low-impact development standards in critical areas such as aquifers, as noted in the draft community plans, the RR/SF to MSF proposal seems contradictory. It places more pressure on already overcrowded schools and roads; requires more services from PCSD and PCFD which are already short staffed and underfunded. These services would be impacted even in the mitigation measures were implemented.

8 ↑ In summary the SWCA does not support this zoning specific change within the proposed action or any of the alternatives.

Please feel free to contact me if there are any questions regarding our comments. We strongly encourage you to work with community groups within the Mid-County area such as the Summit-Waller Community Association, North Collins Clover Creek Community and Midland Community Association to better incorporate their feedback as the Plan is developed in a more collaborative manner. Thank you for the opportunity to provide comments on this EIS.

Sincerely,



Larry Volland
President, Summit-Waller Community Association

Cc: Summit-Waller Community Association board members:

Angela Angove aangove@hotmail.com

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Dee Ferko, North Collins Clover Creek Community Association markdeesmd@msn.com

Dennis Hanberg dennis.hanberg@piercecountywa.gov

Councilmember Marty Campbell marty.campbell@piercecountywa.gov

Response to Summit-Waller Community Association (Letter 7)

Comment 1

Generally, non-project legislative zoning proposals have no immediate or measurable environmental consequences.² The Non-Project DEIS presented a general analysis of probable impacts of proposed legislative actions consistent with WAC 197-11-442. This high-level analysis was appropriate, as the Community Plan Updates DEIS was prepared as a non-project EIS under Phased Review per WAC 197-11-060(5) and WAC 197-11-776, which allows lead agencies the ability to cover general matters in broader environmental documents with subsequent narrower documents concentrating solely on the issues specific to the later analysis. In this context, the County is afforded more flexibility in preparing a Non-Project EIS for long-range planning because there is less detailed data regarding environmental

² *Ullock v. Bremerton*, 17 Wn. App. 573, 581, 565 P.2d 1179 (1977).

impacts and subsequent projects (WAC 197-11-442(1)). Furthermore, WAC 197-11-443(2) specifies that “a nonproject proposal may be approved based on an EIS assessing its *broad* impacts” (emphasis added). Future projects that may arise with respect to the Community Plan Updates non-project proposal will be subject to appropriate review under the State Environmental Policy Act (SEPA).

Where information is known about other potentially-related proposals or actions, the information has been incorporated into the analysis, such as the implementation of future transportation improvements. In particular, all growth-related plans and programs are considered and these are generally within the bounds of actions that are addressed in the Pierce County Comprehensive Plan. DEIS Section 3.2 Plans and Policies summarizes how the alternatives relate to other relevant plans and policies, including the Pierce County Comprehensive Plan.

Comment 2

The DEIS presented a general analysis of probable impacts as afforded by SEPA, including transportation impacts in Section 3.3 Transportation. The traffic model utilized in the DEIS analysis incorporated the potential for traffic diversion along secondary roads.

Comment 3

The comments are noted. No response is provided, as the comments do not materially address issues presented in the DEIS and/or are not specific enough to respond to.

Comment 4

The DEIS presented a general analysis of probable impacts as afforded by SEPA, including land use impacts in Section 3.1 Land Use and Built Environment.

Comment 5

The DEIS presented a general analysis of probable impacts as afforded by SEPA, including land use impacts in Section 3.6 Groundwater and Surface Water, Shorelines, Wetlands, and Flooding.

In that section, the DEIS found probable impacts on groundwater and surface water quantity and quality in Pierce County’s sole source aquifer. Accordingly, impacts on drinking water supplies drawing from groundwater are also probable, as stated in the submitted comment. However, the DEIS found that the mitigation measures identified in the analysis were adequate to avoid any probable significant adverse impacts on groundwater and surface water. So, it can be said that those same mitigation measures are sufficient to avoid any significant adverse impacts on sole source aquifer drinking water quality.

Comment 6

The DEIS presented a general analysis of probable impacts as afforded by SEPA, including air quality impacts in Section 3.5 Air Quality.

Comment 7

The Community Plan Updates non-project proposal has been analyzed under SEPA broadly, per WAC 197-11-443(2). Because the proposal does not entail specific projects, and fish and wildlife habitats are highly location-specific, it was not reasonable to analyze probable impacts on that habitat in the DEIS. However, the DEIS was prepared as part of a phased SEPA review allowed by WAC 197-11-060(5) and WAC 197-11-776. So, later environmental review documents will assess issues specific to project proposals, which may include an analysis of impacts on fish and wildlife habitats as appropriate, including development proposals subject to the County's Critical Areas Ordinance (Title 18E – Development Regulations – Critical Areas) or other applicable law.

Comment 8

The comments are noted and the detailed concerns regarding the Community Plan Updates proposal are appreciated. DEIS comments, including those pertaining to specifics of the Proposed Action Alternative 1, have been incorporated into the public comment record and will be considered by the Pierce County Council in their decision on the final action.

The alternatives presented in the DEIS only represent a range of possible actions that may be taken by Pierce County (consistent with WAC 197-11-440(5)) and do not commit the County to any specific course of action regarding specific proposals. The final action could result in fewer rezones than presented in the DEIS. In such a case, the EIS would remain adequate so long as it continues to encompass the probable environmental effects of the final action.

The specific rezone proposal addressed in the comment has been removed from all alternatives that are analyzed in the Environmental Impact Statement.

The remaining comments do not materially address issues presented in the DEIS and so no additional response is provided.

May 20, 2019

Pierce County Planning & Public Works
2401 South 35th Street
Tacoma, WA 98409
Attn: Dennis Hanberg, Director

Dear Mr. Hanberg,

Community Plan Updates & Draft DEIS

Thank you for considering Tacoma-Pierce County Health Department's scoping comments. The Department appreciates the discussion of human health and community well-being in your Environmental Health section 3.7; and the consideration of the Guide to Integrate Health into SEPA Review¹.

1 Promoting an active lifestyle through active transportation is only one way to improve health. Provided that the scale and design of streets and public realms are attractive and pleasant, compact transit-oriented corridors can promote walkability. However, without regulatory codes to help create a pleasant walking environment, even Alternatives 1 and 2 can't guarantee an increase in physical activity. Consider using form-based code² rather than design standards and guidelines. This regulatory practice provides better predictability on the mass/form of buildings and the scale/type of public streets. As a result, it can increase foot traffic, vitalize businesses and promote social connection.

2 However, there are other equally important root causes affecting health and well-being. According to US Centers for Disease Control and Prevention, the social and economic conditions in the places where people live, learn, work, and play affect a wide range of health risks and outcomes³. These conditions include income, education and the way we shape our built environments. The DEIS should address health at its root causes. Housing is a key factor underlying many social and economic conditions. It provides shelter for a good night sleep, and stability to low-income families enabling children to perform better in schools, adults to keep jobs, and neighbors to feel connected and safe. For this reason, both the County and the Department support Tacoma Pierce County Coalition to End Homelessness⁴ upstream by making safe housing affordable to vulnerable populations. Other factors include fair and affordable access to neighborhood opportunities, such as the natural environment, complete streets, parks and recreation, quality schools, trees and amenities, etc. Create "complete" 20-minute neighborhoods around transit stations can help promote walkability.

¹ <https://www.tpchd.org/Home/ShowDocument?id=586>

² <https://formbasedcodes.org/definition/>

³ <https://www.cdc.gov/socialdeterminants/index.htm>

⁴ <http://www.pchomeless.org/>

2 ↑ The DEIS fails to adequately assess the affordable housing impacts and the cost to build complete neighborhoods⁵. Building complete neighborhoods is a foundation for good health. This means creating wage-affordable housing close to jobs, and services and amenities that people can easily access daily. Under Alternatives 1 and 2, most of the amenities and services needed to make neighborhoods complete and healthy would require new development or expansion. Without committing to an infrastructure funding strategy, this would trigger impact fees and push development cost higher. As a result, it's doubtful whether the new residential developments could remain affordable to those working nearby. We do not wish to see residential developments in this area only affordable to high-wage earners working beyond our County. Long commuting severely costs our health and well-being. We need to ensure housing developed is wage-affordable to "local" workers.

Before finalizing the EIS, consider the following:

- 3
1. Besides major services such as parks and schools, is there any unused infrastructure capacity to accommodate more density than Alternative 4? What's the bulk and density threshold that the current levels of essential public services and amenities can support, without having to trigger new or expanded services and impact fees? Could such a "feasible" level of compact growth around transit stations, without relying excessively on impact fees, be considered as an alternative to assess?
 - 4 2. The impact of "impact fees" on affordable housing should be assessed. What would the estimated per dwelling unit impact fees be under each alternative?
 - 5 3. Identify mitigation measures to ensure housing produced is affordable to nearby workers, assuming impact fees would eventually be borne, at least in part, by prospective homeowners? Assess the costs and benefits of waiving impact fees on units designated "affordable".
 - 6 4. Devise a funding strategy, besides impact fees, to address current service and amenities gaps, and future infrastructure investment needs.
 - 7 5. Consider renaming "single-family" to "detached or single-detached". This subtle change can remove the notion of protecting one family per dwelling. At the same time, this allows more than one household to share a free-standing detached dwelling in keeping with the character of traditional neighborhoods. Such built form can accommodate a range of "missing-middle housing"⁶, ranging from duplex to sensitively-designed quadplex.

Tacoma-Pierce County Health Department continues to work with the County to make our communities healthier.

Sincerely,



Amy Pow, MCIP
Principal Planner, Healthy Community Planning Program
Tacoma Pierce-County Health Department
apow@tpchd.org
(253) 576-6222

⁵ <https://www.portlandonline.com/portlandplan/index.cfm?a=390208&c=58269>

⁶ <https://missingmiddlehousing.com/>

Response to Tacoma-Pierce County Health Department (Letter 8)

Comment 1

The comments are noted. The DEIS addressed physical activity in Section 3.7 Environmental Health, stating that “Alternatives 1 and 2 would support increased human health and physical activity...” The comment is correct in noting that these alternatives would not guarantee such a result.

Comment 2

Pursuant to WAC 197-11-448, the EIS is not required to analyze economic impacts, including the cost to build complete neighborhoods, as noted in the comment.

The EIS is also not required to analyze impacts on Human Health and Community Well-Being under SEPA. However, this was included as an optional element in DEIS Section 3.7.1 because the County acknowledges the importance of the proposal’s potential effects on this topic. The DEIS primarily addressed the alternatives’ effects on walkability and physical activity. To the extent that the alternatives would concentrate and densify development around major transportation corridors, the alternatives would support new or expanded transit service and allow the opportunity for 20-minute neighborhoods around transit stations.

An analysis of the alternatives’ potential impacts on housing is provided below as a new chapter to the DEIS.

3.8 Housing

3.8.1 Affected Environment

The need for housing affordable to all community members is an issue facing Pierce County, the Puget Sound region, and many other metropolitan areas across the United States. Lack of affordable housing is a significant social determinant of health. Affordable housing can help to reduce involuntary displacement and help to address homelessness, and as a result can have positive impacts on mental well-being. Approximately ten percent of households in the study area are below the poverty level (2012-2016 American Communities Survey) and high demand exists for housing affordable to people who have low and very-low incomes.

The generally-accepted definition of ‘affordability’ is for a household to pay no more than 30% of its gross income on housing, including utilities. Households paying over this amount are considered cost-burdened. Approximately 49% of renting households in the study area spend more than 30% of their income on housing and 20% of renting households spend more than 50% of their income on housing, which the US Census Bureau identifies as a “severe housing

cost burden.” In contrast, around 27% of homeowners are housing cost-burdened and 8% are severely cost-burdened.

Regulatory Framework

Housing policy guidance for the study area is provided by Pierce County’s Comprehensive Plan, the Pierce County Countywide Planning Policies, and Puget Sound Region’s Vision 2040. These policies are designed to ensure that there is enough development capacity to accommodate 2040 housing growth targets, that healthy and safe housing stock is built, and that a wide range of housing options are available to accommodate the needs of diverse populations. Goal H-7 in the County’s Comprehensive Plan aims for affordable housing solutions that benefit all economic segments of the population. Policy H-7.11 calls for providing low-income, affordable housing for 25% of the adopted population growth target. This is consistent with the Pierce County Countywide Planning Policies and Vision 2040.

Affordable housing incentives are included in Pierce County Code Chapter 18A.65, which could help to encourage affordable housing in the study area. These include financial incentives, such as expedited permit processing and fee reductions for developments providing affordable units. These incentives are resource-dependent and are not guaranteed. In addition, a multifamily tax exemption is available under State law for developments incorporating affordable housing units.

3.8.2 Impacts

Impacts Common to Alternative 1 and Alternative 2

Alternatives 1 and 2 have the potential to increase the total supply of housing expected by 2040 (approximately 2,646 units and 3,426 units, respectively), both through new development and redevelopment/conversion of existing properties. Following publication of the DEIS, Pierce County hired a third-party consultant to conduct an independent market analysis of residential growth that may be expected under Alternative 1, as detailed in the 2020 Pierce County Housing Market Study in Appendix B: References. The Housing Market Study determined Alternative 1 may result in up to 2,020 additional housing units by 2040, compared to the No Action growth scenario.

In addition, these alternatives are expected to encourage many of the 13,950 already-planned-for housing units be constructed in higher-density, compact developments, such as multifamily apartments, townhomes, and cluster cottage housing on small lots, resulting in more naturally affordable housing compared to detached single-family homes. These more affordable, higher-density homes would potentially be constructed in lieu of single-family homes and as a replacement for larger lot, single-family homes in low-density redevelopment areas.

By encouraging more housing development overall, these alternatives increase the likelihood that additional homes will be provided in the form of low-income housing, either by taking advantage of existing County incentives or by utilizing new height bonus incentives proposed by the alternatives.

Impacts Common to Alternative 3 and Alternative 4

Alternatives 3 and 4 would generally continue to limit housing supply through maximum density restrictions and large areas zoned only for single-family homes. The heavy reliance on such low-density, single-family development is connected to the current market's high housing costs.

As noted in the comment, access to affordable homes provides shelter, supports stability for families and children attending school, encourages job retention, and increases an individual's investment in their community's safety. Because Alternatives 3 and 4 minimally change the County's existing development pattern and housing costs, little change would be expected in areas of human health and community well-being related to housing instability.

3.8.3 Mitigation Measures

Alternatives 1 and 2 would allow greater varieties of housing types and higher residential densities, leading to a potentially greater supply of housing that improves overall housing affordability. Existing and future zoning incentives would encourage the construction of more income-restricted, affordable housing in the plan areas.

3.8.4 Significant Unavoidable Adverse Impacts

Alternatives 1 and 2 are expected to encourage the development of affordable housing and so would not result in significant unavoidable impacts on housing.

Alternatives 3 and 4 would generally have little effect on existing housing costs or affordable housing supply and so they are not expected to result in significant unavoidable adverse impacts on housing. No significant unavoidable adverse impacts on housing are expected.

Comment 3

The Non-Project DEIS presented a general analysis of probable impacts, including those affecting infrastructure. This high-level analysis was appropriate, as the Community Plan Updates DEIS was prepared as a non-project EIS under Phased Review per WAC 197-11-060(5) and WAC 197-11-776, which allows lead agencies the ability to cover general matters in broader environmental documents with subsequent narrower documents concentrating solely on the issues specific to the later analysis. Furthermore, WAC 197-11-443(2) specifies that "a nonproject proposal may be approved based on an

EIS assessing its *broad impacts*” (emphasis added). Future projects that may arise with respect to the Community Plan Updates non-project proposal will be subject to appropriate review under the State Environmental Policy Act (SEPA), at which time the ability of existing infrastructure to accommodate a specific project would be analyzed.

Under the County’s existing impact fee programs, fees are assessed to mitigate some of a project’s anticipated impacts at a level that balances the benefits of fee revenue with the benefits of avoiding burdensome development costs, whether existing infrastructure exists to accommodate those impacts or not. Development arising under all alternatives would be subject to impact fee assessment, as applicable. Further, the alternatives presented in the DEIS were adequate in presenting several alternative means of accomplishing the proposal’s goal and objectives.

Comment 4

Revised Code of Washington (RCW) 43.21C.031 states that “An environmental impact statement...shall be prepared on proposals for legislation and other major actions having a probable significant, adverse environmental impact.” The DEIS was prepared to analyze the potential for any probable environmental impacts arising from the Community Plan Updates non-project proposal.

Because the proposal does not include legislation or actions that would modify existing impact fee programs, no analysis on the effects of impact fees on affordable housing is required. It is noted that Pierce County offers some impact fee relief for affordable housing purposes through its existing codes.

Comment 5

As discussed in Chapter 3.8, no significant unavoidable adverse impacts on housing are expected as a result of the alternatives, and an analysis on the role of impact fees on housing prices is not required because these would not be modified as part of the Community Plan Updates non-project proposal. Accordingly, no mitigation measures have been identified.

Comment 6

As appropriate, the DEIS identified various mitigation measures, including those related to funding, that address the alternatives’ impacts on infrastructure and services.

Comment 7

The comment is noted. No response is provided, as the comment does not materially address issues presented in the DEIS.



Tacoma

City of Tacoma
City Manager

May 20, 2019

Honorable Bruce Dammeier, Pierce County Executive
County-City Building
930 Tacoma Avenue South, Room 737
Tacoma, WA 98402-2100

RE: Pierce County Community Plan and Draft Environmental Impact Statement (EIS)

Dear Executive Dammeier:

Thank you for this opportunity to comment on this major initiative. The City of Tacoma is writing to you directly (with a copy to your designated staff) because we feel strongly that these proposals are of fundamental importance to both of our jurisdictions.

As this letter explains in detail, Tacoma has very serious concerns regarding the Draft EIS. Our review shows that the Draft EIS assumes a fraction of the growth that your proposed regulations would allow. Because the Draft EIS drastically understates likely growth it is not a useful tool to evaluate impacts, and in our view fails to meet the requirements of the State Environmental Policy Act (SEPA). By this letter, we request that the Draft EIS be reworked to address the development impacts which can reasonably be anticipated from the proposed large-scale increases in permitted height and density.

1 Tacoma also has fundamental concerns regarding the proposed growth vision and upzones. While we see merit in the Centers and Corridors concept for the Pacific Avenue Bus Rapid Transit (BRT) corridor, we are strongly opposed to proposed upzones elsewhere in the Urban Growth Area (UGA) where lack of urban services and transportation facilities, and other factors, make dense urban growth inappropriate.

We applaud the initiative to focus on this important area, and urge Pierce County to take more time for collaborative visioning, planning and technical analysis to develop a growth strategy informed by state, regional and local policy goals, including the ongoing Vision 2050 and Buildable Lands updates. It is our position that the proposal as it stands is not consistent with those policies and would have major, long-term negative impacts to Pierce County, Tacoma and the region.

Comments on the Draft EIS

2 We respectfully submit that the DEIS in its current form has a fatal flaw in its methodology that can only be corrected by reworking and reissuing a new DEIS. If this analysis were focused around our collaborative efforts with Pierce Transit as related to the Pacific Avenue Bus Rapid Transit Project, we would have minimal technical comments. However, the EIS is intended to inform proposals to up-zone thousands of acres outside the BRT corridor with up to 85 feet in height and unlimited density within proposed Centers and Corridors, and to up-zone hundreds of acres even further from transit and urban services. Given the scope of the upzones, the DEIS growth assumptions are unrealistically low. As a result, the analysis falls far short of SEPA requirements, and minimizes likely growth impacts.

An area-wide EIS must contain a capacity analysis, followed by a thorough market analysis and a range of reasonable alternatives. To illustrate, in Tacoma’s 2014 South Downtown Subarea Plan and EIS (an area that encompasses approximately 600 acres) the City of Tacoma first considered Pierce County’s analysis of the redevelopment potential in portions of Downtown Tacoma in a 2009 report entitled Identifying Redevelopable Lands. This report looked at the opportunities associated with maximizing the existing zoning potential for dense development and with a 10% increase in rents. The City concluded that South Downtown Tacoma could accommodate 42,225 people and 62,431 jobs. The City then applied a market analysis and evaluated three alternatives: (1) 30,000 more residents and 40,000 jobs; (2) 20,000 residents and 26,667 jobs; and (3) 10,000 residents and 13,333 jobs.

In contrast, the current DEIS Alternatives 1 and 2 would establish two new zoning categories: Towne Center and Urban Corridor. Alternative 1 would create 814 acres of Towne Center zoning and 1,630 acres of Urban Corridor zoning for a total of 2,444 acres. Alternative 2 would create 593 acres of Towne Center zoning and 2,742 acres of Urban Corridor zoning for a total of 3,335 acres. By way of comparison, the entire Downtown Tacoma Regional Growth Center has a total of 1,424 acres. Both new zones drastically increase development potential over current zoning by removing the current density maximums and increasing height to 85 feet in Towne Center zones and 65 feet in Urban Corridors (DEIS, page 21). These are very substantial increases in development capacity, even in those areas already zoned for commercial development and clearly in single-family zoned areas.

Given the current real estate market in our region, we respectfully submit that the DEIS dramatically understates the scale and impacts of the current up-zoning proposal. The DEIS posits an Alternative 1 of 2,646 additional housing units beyond the 18,180 housing units expected by 2040 under current zoning and an Alternative 2 of 3,426 additional housing units beyond the 18,180 housing units expected by 2040 under current zoning. This equates to about one multi-family five-over-two building a year for 20 years.

These low growth assumptions do not bear scrutiny. Under DEIS Alternatives 1 and 2, if only a modest assumption of 10% of this combined acreage was developed or redeveloped under these proposed new zones, this would produce approximately 30,000 new housing units by 2040. Yet, without any capacity study or market analysis, the DEIS drops this figure to approximately 3,000 new units by 2040. The DEIS simply states that: “Several factors have been considered to establish the number and location of net new housing units over the next 20 years:

- Trending areas in today’s development market
- Proximity to utilities to support dense development
- Availability of large parcels that have high development or redevelopment potential
- Existing or future access to high-capacity transit service
- Historic annual residential development trends
- Expressed interest from property owners” (DEIS pg. 94 and 95)

The DEIS analysis of growth potential is premised on the assumption that the impacts of existing zoning do not need to be analyzed by the current DEIS. However, the proposal makes fundamental changes to the current zoning capacity by removing its density maximums. This gap in analysis is critical, particularly when considered over such a large area. By way of comparison, the overall permitted density under both Alternatives 1 and 2 broadly equates to that of the Downtown Tacoma Regional Growth Center.

3 These alternatives do not cover nor constitute the range of reasonable alternatives required under SEPA and request that you rework and reissue a new DEIS such that the public and public agencies can have an opportunity to understand and comment on potential impacts.

4 Furthermore, the DEIS does not include an assessment of consistency with Tacoma’s policies, zoning and standards for the Potential Annexation Area as requested in our May 23, 2018 scoping comments letter. We believe that such an assessment would identify both spillover impacts to Tacoma’s streets, infrastructure and neighborhoods, environmental impacts from undermining growth in cities, and impacts from directing growth into areas with gaps in the essential urban services and amenities.

5 Alternatively, while this is not our assertion, if the DEIS’s low development levels were in fact realistic, this would further undermine the premise. Unincorporated Pierce County is already on track to exceed its regional growth allocations and has ample zoning capacity today to do so. Upzones would clearly accelerate that trend and are not necessary to accommodate reasonable growth.

6 The DEIS conclusion that there are no significant adverse impacts from the proposal has not been substantiated. The EIS does acknowledge that consistency with Multicounty Planning Policies and regional growth strategy is one of several “Significant Areas of Controversy and Uncertainty” (DEIS page 16), yet offers no resolution.

Collaborative planning

Early on in the County’s process for rezoning and amending the Community Plan for the City’s Potential Annexation Area, staff raised two procedural concerns: 1. That the Countywide Planning Policies (CPPs) support joint planning, between the County and the City, for the PAA, and 2. That joint planning should support and/or lead to the eventual annexation/incorporation of the PAA. On May 23, 2018 the City of Tacoma submitted a letter raising concerns regarding the scope of Pierce County’s Centers and Corridors proposals and requesting joint planning. At the time, however, the CPPs were clear on the potential content of joint planning, but vague on the specifics of how joint planning should be conducted. As you know, the agencies agreed to a staff-level planning consultation process which occurred over the next several months. Since that time, a model for joint planning has been established in relationship to the Tideflats Subarea Plan. Perhaps this model for joint planning could be transferred to the discussions at hand.

7 Nonetheless, Tacoma would like to thank Pierce County staff for participating in a staff-level collaboration for the Community Plan updates. During that collaboration, Tacoma staff consistently argued that the following principles should underpin planning for Pierce County’s UGA:

- The Growth Management Act, Countywide Planning Policies, Multicounty Planning Policies and Vision 2040 provide a strong policy framework that cities are the right place for growth, and that growth, land use, and infrastructure decisions must support that.
- A robust environmental analysis based on realistic growth scenarios is essential to meaningful insight into growth impacts and necessary mitigation steps. Such an analysis would likely reveal that directing this level of growth to Pierce County’s UGA undermines Tacoma’s long-term growth, creates spillover impacts to Tacoma neighborhoods, and risks establishing areas that are no longer rural but also not entirely urban in the County.

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- To prevent sprawl and establish for orderly urbanization patterns, growth in UGAs must be targeted where it can efficiently be supported with transportation choices and urban services within areas appropriate for eventual annexation or incorporation.
 - Despite the large size of the UGA, the Pacific Avenue BRT corridor and Tacoma’s PAA are the primary areas with characteristics that make a stronger case for urban development. Planning for these areas should promote eventual annexation or incorporation, including by demonstrating general consistency with the City’s policies and development standards.
 - In all areas zoned for growth and development, land use, development standards, transportation investments and other strategies must be carefully crafted and supported to catalyze fully urban development patterns. This is essential to creating livable, healthy and sustainable places to live and work, and to prevent locking in patterns of over-dependence on cars and the associated spillover effects on adjacent areas.

We recognize positive components of the proposal, which emphasizes harnessing private investment and development to address community needs, including:

- Promoting Transit Oriented Development along the Pacific Ave BRT corridor
- Increasing employment base in the South Sound area
- Seeking ways to address gaps in urban services
- Promoting revitalization of stagnant commercial areas
- Simplifying and clarifying the existing system of zoning districts
- Improving development standards to result in a more walkable and urban built environment
- Adopting an affordable housing height bonus option

Though the staff discussions did bear fruit, fundamental disagreement remains regarding the scope and extent of the proposed upzones. The City continues to be concerned that the current proposal will result in patterns of urban sprawl and strip development, with long-term negative impacts to Tacoma’s growth, the environment, transportation choices and quality of life.

Policy recommendations

As Pierce County continues these policy discussions, we request that you consider the following topics and integrate them into a revised DEIS.

Support Centers and Corridors.

Instead of large-scale area-wide upzones, growth should be focused along the Pacific Avenue BRT corridor, with corresponding decreases of development capacity outside of that corridor, and with full urban infrastructure, services and amenities. Proposed designation of the other three Centers and connecting Corridors should be delayed until such time as significant transit-supportive development has occurred along Pacific Avenue and within Tacoma’s nearby Centers. Designating Centers of Local Importance in areas without high capacity transit, particularly outside the Transit Benefit District, inappropriately prioritizes infrastructure investment to non-transit-supportive areas.

For the Pacific Avenue corridor, the proposal upzones the entire corridor to 65 feet with no maximum density and broadly flexible use standards. This approach risks continuing existing patterns of strip commercial development, and may undercut the proposed Centers by spreading growth over a large area. Instead, height and density should be moderate between the Centers, consistent with Tacoma’s concept of pattern corridors with clearly identifiable, transit-ready urban nodes.

Pierce County should support its proposed Centers and Corridors by creating a mechanism to shift growth away from other areas which are not appropriate for dense urban growth (e.g., reducing the size of the UGA, downzones of environmentally sensitive areas or areas where providing urban services is challenging, or establishing a Transfer of Development Rights program).

Upzones walkable to transit stations.

Proposed upzones that effectively widen and extend the corridors beyond a quarter-mile walkable distance to transit stations should be removed or scaled back. In addition, the proposed single-family upzones located far from proposed centers and corridors would be highly auto-dependent and far from walkable amenities and should not move forward.

Protect environmentally sensitive areas.

The proposal includes upzones of areas with significant critical areas and flood hazards (see DEIS pg. 175 which maps the County Wetlands Inventory), yet concludes that critical area standards are adequate. While critical areas standards offer some protection, increasing development pressure would very likely result in impacts. Areas with substantial critical areas should not be zoned to promote development.

Portland Avenue upzones.

The proposed upzones and extension of high density zoning along Portland Avenue south of the City boundary should be removed or scaled back. The upzones would likely undercut development potential in Tacoma’s adjacent Portland Avenue Mixed-Use Center.

Growth only where urban services are available.

The proposal includes upzones in areas where providing urban services may be costly and challenging. Many of the areas proposed for upzones have incomplete and disconnected street and pedestrian networks and currently lack basic infrastructure such as sewer service. Directing high density development to such areas effectively locks in higher infrastructure costs, auto-dependency and incomplete neighborhoods.

Vision for urban development.

Everyone deserves livable, distinct neighborhoods with high quality of life. For better or worse, recent growth has occurred largely in an auto-dependent, suburban manner. This impacts the people who live there. Further community discussion is warranted to refine a well-supported vision for how Pierce County’s UGA can transition into places that offer all the advantages of true urban neighborhoods. State, regional and local policies offer a strong starting point, emphasizing 20-minute walkable



neighborhoods, promoting diverse housing types in high opportunity areas, walkability, and access attractive public gathering spaces. A more robust environmental review will shed light on the resources needed to make that vision a reality and should incorporate solid commitments to doing so.

Transportation choices.

State, regional and local policies strongly emphasize the importance of transportation choices. To create true urban neighborhoods, Pierce County should offer commitments to multimodal transportation and connectivity strategies including complete streets, active transportation pathways, and transit service. Pierce County should consult with Washington State Department of Transportation regarding growth impacts to state highways. In addition, Pierce County must coordinate with transit providers and extend the Transit Benefit District before any consideration of upzones outside its current boundaries. Finally, regulatory and other tools are needed to create new street and pedestrian connections with development where they are currently lacking.

Environment and quality of life.

State, regional and local policies strongly emphasize the importance of green features and open space as critical to quality of life in urban areas. Pierce County should more strongly protect the environment and promote sustainability through ensuring that critical areas, stormwater and aquifer protections are consistent with the City of Tacoma as well as with other applicable standards. Tacoma’s urban forestry, tree canopy coverage goals, and landscaping standards offer one model. Proactive parks, open space and trail planning is critical to ensure that residents can walk to attractive neighborhood destinations. Pierce County should ensure that cherished natural, historic and cultural features are protected as growth occurs.

Tacoma’s Potential Annexation Area.

As proposed centers and corridors urbanize, residents may ultimately seek to become part of the City of Tacoma or to incorporate as separate cities. In partnership with the County, the City of Tacoma will seek opportunities to support community dialogue on this topic. Meanwhile, within Tacoma’s PAA the City urges Pierce County to strive for consistency with City standards for infrastructure, services and utilities.

Vision 2050.

The Puget Sound Regional Council is in the process of conducting an environmental review analysis for the update and extension of the Multicounty Planning Policies, which includes regional population forecasts and growth targets for jurisdictions planning under GMA. As part of the Environmental Review, the PSRC is considering a growth alternative that would shift growth targets from Tacoma to Unincorporated Pierce County.

Following the adoption of VISION 2050, which is expected in 2020, an updated Buildable Lands Analysis will be conducted to determine sub-allocations for housing and whether jurisdictions have appropriate zoning and buildable lands capacity to accommodate the planned growth. Pierce County has already initiated a process to begin evaluating a buildable lands methodology that would be applied to the next round of updates. Local jurisdictions, including Counties, are required to take reasonable measures to bring plans and zoning into conformance with these planned growth targets. State law on buildable lands requires jurisdictions that are both underperforming targeted growth and over-performing



targeted growth, to take steps to bring development forecasts into conformance with the planned targets.

Following the Buildable Lands Update, Pierce County and the City of Tacoma will be conducting the periodic review of local Comprehensive Plans and Zoning for consistency with VISION 2050 and local housing and employment targets.

The process for conducting these updates is deliberately set out in a sequential fashion to ensure consistency between regional policies and local comprehensive plans. The County's move to massively rezone Unincorporated Pierce County disrupts this deliberative process, vesting development potential before these policies and analyses have been accomplished, and without conducting the review necessary to substantiate that these changes are consistent with VISION 2040. Under the proposal, the County's development ceiling in the 2014 Buildable Lands Report (a demonstrated capacity for 40,000 new housing units), would now represent the floor for growth expectations going forward, yet this fundamental change to the County's zoning structure is not addressed in the draft EIS.

We urge Pierce County to continue to focus on this important area, postpone the current proposals and utilize the policy guidance and analytical tools now being developed. This would allow a better opportunity for our communities to grow together and build a positive future for Pierce County as a whole.

My team continues to be willing to meet and discuss these issues and potential options/paths forward. If you have questions or wish to schedule further meetings, please feel free to reach out to me or to Peter Huffman.

Sincerely,



Elizabeth Pauli
City Manager

cc. Eric Jaszewski, Pierce County Planning and Land Use
Randall Lewis, Government Relations Officer
Peter Huffman, Planning and Development Services Director

Response to City of Tacoma (Letter 9)

Comment 1

The comments are noted. Responses to the comments that materially concern the DEIS can be found below.

Comment 2

The DEIS considered impacts expected to result from the future growth under the action alternatives (2,646 added housing units for Alternative 1 and 3,426 added housing units for Alternative 2). The comment seems to assert the potential added residential growth presented in the alternatives may, in fact, be greater. Following publication of the DEIS, Pierce County hired a third-party consultant to conduct an independent market analysis of residential growth that may be expected under Alternative 1, as detailed in the 2020 Pierce County Housing Market Study in Appendix B: References. The Housing Market Study determined Alternative 1 may result in up to 2,020 additional housing units by 2040, which is less than the 2,646 additional units forecasted in the DEIS for Alternative 1. The DEIS analysis remains adequate, with the original impact analysis encompassing the lower potential impacts that may be expected based on the Housing Market Study findings.

The comment also speculates that resulting job growth would reach a similar level. How increasing zoned densities and heights alone would cause this growth by 2040, especially in relation to jobs, is not substantiated by the comment.

For job growth, the DEIS stated in Section 3.3.2:

The action alternatives would allow a greater mix of non-residential land uses, so some added commercial and employment growth is expected beyond what would occur under existing development regulations. However, this increment of increased job growth that may result from the action alternatives has not been estimated because it is not expected to differ substantially from job[sic] normal job growth under existing zoning.

To add, economic growth is highly unpredictable, and certainly not solely dependent on the amount of land zoned for commercial uses. Therefore, it would not be reasonable to assume additional job growth when presenting probable impacts resulting from the alternatives.

For housing unit growth, the DEIS substantiates the 20-year growth projections, using factors listed in Section 3.3.2, as being based on:

- Trending areas in today's development market
- Proximity to utilities to support dense development
- Availability of large parcels that have high development or redevelopment potential
- Existing or future access to high-capacity transit service
- Historic annual residential development trends

-
- Expressed interest from property owners

The DEIS' basic market analysis is similar to the Buildable Lands capacity analysis required under the State's Growth Management Act. That Act states that "the zoned capacity of land alone is not a sufficient standard to deem land suitable for development or redevelopment within the twenty-year planning period" (RCW 36.70A.215 (3)(a)). Based on County building permit records, an average of 283 housing units total per year were constructed in the community plans areas between 2012 and 2018. The DEIS presented a reasonable and probable increase in residential growth compared to the No Action scenario and supposes a reasonable annual increase beyond historical trends in the study area. It should also be noted that this increase is the growth increment above and beyond the already-planned-for housing unit growth of approximately 13,950 units in the area by 2040.

Following publication of the DEIS, Pierce County hired a third-party consultant to conduct an independent market analysis of residential growth that may be expected under Alternative 1, as detailed in the 2020 Pierce County Housing Market Study in Appendix B: References. The Housing Market Study determined Alternative 1 may result in up to 2,020 additional housing units by 2040, which is less than the 2,646 additional units forecasted in the DEIS for Alternative 1. The DEIS analysis remains adequate, with the original impact analysis encompassing the lower potential impacts that may be expected based on the Housing Market Study findings.

Comment 3

The range of reasonable alternatives must include a "no-action" alternative, as well as actions that could feasibly attain a proposal's objectives at a lower environmental cost; however, the variety of alternatives is intended to be limited (WAC 197-11-440(5)). The DEIS provided Alternative 4 as the no action alternative and provided Alternative 3 as that action with a lower environmental cost than the proposed action (Alternative 1). With these alternatives, and Alternative 2 as the most impactful alternative, the DEIS gave a proper range of reasonable alternatives as required by SEPA.

Comment 4

With some of the planning area in Tacoma's Potential Annexation Area, regional and Countywide planning policies support joint planning between Tacoma and Pierce County. While Pierce County and the City of Tacoma have not entered into a formal Joint Planning Agreement on the Community Plan Updates, staff from both jurisdictions have continually collaborated and Pierce County has made changes to the Proposed Action as a result, as acknowledged in the comment.

Furthermore, the County has considered the Plans & Policies impacts resulting from the alternatives beyond its jurisdictional boundaries. An impact analysis on Tacoma's Plans & Policies was not conducted in the DEIS because the potential for Tacoma to annex the areas by 2040 was considered speculative, therefore, the potential for impacts was improbable. The DEIS adequately analyzed other extra-jurisdictional environmental impacts mentioned in the comment.

Comment 5

The comment is noted. No response is provided, as the comment does not materially address issues presented in the DEIS.

Comment 6

The Non-Project DEIS presented a general analysis of probable impacts consistent with WAC 197-11-442. This high-level analysis was appropriate, as the Community Plan Updates DEIS was prepared as a non-project EIS under Phased Review per WAC 197-11-060(5) and WAC 197-11-776, which allows lead agencies the ability to cover general matters in broader environmental documents with subsequent narrower documents concentrating solely on the issues specific to the later analysis. Furthermore, WAC 197-11-443(2) specifies that “a nonproject proposal may be approved based on an EIS assessing its *broad* impacts” (emphasis added). Future projects that may arise with respect to the Community Plan Updates non-project proposal will be subject to appropriate review under the State Environmental Policy Act (SEPA).

Significant areas of controversy and uncertainty are not required to be resolved through the SEPA process.

Comment 7

The comments are noted, and the detailed concerns regarding the Community Plan Updates proposal are appreciated. DEIS comments, including those pertaining to specifics of the Proposed Action Alternative 1, have been incorporated into the public comment record and will be considered by the Pierce County Council in their decision on the final action.

The alternatives presented in the DEIS only represent a range of possible actions that may be taken by Pierce County and do not commit the County to any specific course of action regarding specific proposals. The final action could result in fewer rezones than presented in the DEIS. In such a case, the EIS would remain adequate so long as it continues to encompass the probable environmental effects of the final action.

The remaining comments do not materially address issues presented in the DEIS and so no additional response is provided.

May 20, 2019

Mr. Erik Jaszewski, Associate Planner
Pierce County Planning and Public Works
2401 South 35th Street
Tacoma, WA 98409-7460

Via Email

Re: Community Plan Updates Draft EIS Comments

Dear Mr. Jaszewski:

The Bethel School District would like to provide the following comments on the Community Plan Updates Draft Environmental Impact Statement (DEIS):

1. **Enrollment Impacts and School Site Dedication:** The increase in student population from the proposed substantial increase in permitted residential densities will have a significant adverse impact on the Bethel School District and the District's ability to house students consistent with the District's Capital Facilities Plan (CFP) level of service, which CFP is incorporated by the County under its Comprehensive Plan.

Based on the Centers and Corridors traffic analysis and allocation of future development to the Sprinker Towne Center and the Neighborhood Corridor (NCOR) around 78th Avenue East and 176th Street as well as the addition of residential development in the Frederickson Towne Center, the District could see an additional 766 additional students, 301 elementary, 292 middle school and 173 high school. Just to address increases in elementary school enrollment, from the proposed growth and existing demands, the District would need an additional school within one of the three areas to accommodate future growth.

The District expects 2538 new students over the next ten years without the Community Plan Update proposals. Additional students from the Community Plan Update proposals would need facilities over and above those required by existing enrollment projections.

As Comprehensive Plan Policy CF-20.1.3 supports "*the ability to provide adequate school facilities including... property dedication*" the provision of a school site within one of these area is needed. If a school site cannot be found within one of these areas the District would need to find a future school site in rural areas and make school attendance boundary changes to accommodate the future growth.

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2. **School Impact Fees:** School impact fees inadequately compensate School Districts for a developer's fair share of costs arising from growth which is a cumulative impact to the District that is not being adequately mitigated. This deficiency should be noted in the in the DEIS i.e. that impact fees as currently approved do not adequately mitigate for development impacts and should be increased accordingly. This is a significant adverse impact to the District.

The Pierce County Council approved the following policy in the Capital Facilities Element under Ordinance 2019-15s:

1 **CF-20.1.3** "Adequate school facilities should be provided concurrent with need. Pierce County should employ a variety of strategies to support school districts' ability to provide adequate school facilities including, but not limited to, school impact fees, property dedication, school supportive zoning, and development phasing/timing or other project specific mitigation."

This policy recognizes the impact to school districts and calls for further action by the County to provide adequate school facilities concurrent with need. The policy now needs to be implemented by further action to adjust impact fees to adequately address development impacts on schools.

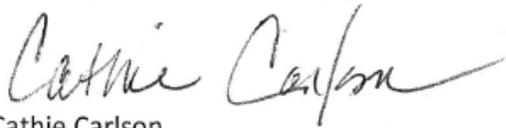
- 2
3. **Transit:** The lack of public transit and the plans to minimally increase routes within the Center and Corridor areas within the Bethel School District does not adequately address significant mobility impacts. The District supports the prioritization, funding and construction of the proposed north/south corridors identified in the Community Plan Updates. The District also supports the expansion of the Pierce Transit service area to include the Frederickson Community Plan area and the expansion of transit service.

- 3
4. **Centers and Corridors:** While Centers and Corridors will increase student enrollment and impacts on facilities, the District supports the overall concept of allocating future growth to areas of existing infrastructure investment and creating communities that can be better served by and support transit. The District Capital Facilities Planning will need to adjust for increases in growth in the Centers and Corridors, however, finding future school sites within the Urban area will continue to be a challenge. As you are aware, following an exhaustive search, a suitable site in the urban area for the Bethel High Replacement School Site could not be located. The District supports future collaboration with the County on accommodating school sites within the Urban area to provide school facilities that are accessible by walking and biking particularly to serve proposed Centers.

5. **Connectivity:** The District also notes the impact of connectivity policies and development regulations on walking and biking to school sites. Connectivity has not been required in many developments and severely restricts the opportunity for student to walk or bike to school. The District supports the policies and development regulations of the Community Plan Update that would increase connectivity.

Thank you for the opportunity to comment on the Community Plan Updates Draft EIS. Please advise the District of the availability of the Final EIS.

Sincerely,



Cathie Carlson
Director of Construction and Planning

cc: Bethel School Board Directors
Thomas Seigel, Superintendent
Mary Urback, PLLC

Response to Bethel School District (Letter 10)

Comment 1

The potential for Bethel School District to experience significant adverse impacts is acknowledged. However, DEIS Section 3.5.6 identified mitigation measures that would avoid these significant adverse impacts including:

- Assessing school impact fees on new development.
- Preparing Capital Facilities Plans that require school districts to identify ways to accommodate growth, along with financing methods.
- Adjusting school attendance areas to shift enrollment growth to other schools with capacity.

Granted, school impact fees only partially mitigate the impact of growth because Washington State requires school districts to rely on a balance of funding sources. Besides impact fees, school districts can rely on property taxes, bonds, and levies. Revenue from these funds may increase with the development expected under the alternatives.

Finally, the following change (as highlighted) is made to DEIS Section 3.4.6 Mitigation Measures to further reduce any potential impacts resulting from the alternatives:

The County requires districts to maintain at least a six-year forecast of needs and a six-year plan for funding to benefit from impact fees. The Comprehensive Plan Capital Facilities Element policies encourage school districts to provide adequate school facilities concurrent with need and encourage Pierce County to employ a variety of strategies to support school districts' ability to provide those facilities including, but not limited to, school impact fees, property dedication, school supportive zoning, and development phasing/timing or other project specific mitigation. Said policies also suggest that Pierce County, in coordination with school districts, establish a committee of school district representatives responsible for

conducting a review of each school district's capital facilities plan and which may make recommendations to the school district(s) and Pierce County on actions that may be taken in response to the projected deficiencies.

Comment 2

The DEIS identified a variety of mitigation measures, in addition to improved transit service, that would avoid any potentially significant transportation impacts.

Comment 3

The comments are noted. No response is provided, as the comments do not materially address issues presented in the DEIS.



816 Second Ave, Suite 200, Seattle, WA 98104
 p. (206) 343-0681
futurewise.org

May 20, 2019

Mr. Jeffrey D. Mann, Senior Planner
 Pierce County Planning & Public Works Department
 2401 South 35th Street
 Tacoma, Washington 98409

Dear Mr. Mann:

Subject: Comments on the Draft Environmental Impact Statement – Community Plan Updates for South Hill, Mid-County, Frederickson, and Parkland-Spanaway-Midland Community Plans.

Sent via U.S. mail and email to: jeff.mann@piercecounitywa.gov; erik.jaszewski@piercecounitywa.gov

Thank you for the opportunity to comment on the Draft Environmental Impact Statement - Community Plan Updates for South Hill, Mid-County, Frederickson and Parkland-Spanaway-Midland Community Plans (Draft EIS). Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State including Pierce County.

Futurewise commented on the scope of the EIS. The Draft EIS does not adequately analyze and disclose the impacts of the proposal. The Washington State Supreme Court has summarized the main standards for determining if an EIS is adequate.

The adequacy of an EIS is a question of law subject to de novo review. *Klickitat Cy. Citizens Against Imported Waste v. Klickitat Cy.*, 122 Wn.2d 619, 632, 860 P.2d 390 (1993); *Citizens for Clean Air v. Spokane*, 114 Wn.2d 20, 34, 785 P.2d 447 (1990); *Barrie v. Kitsap Cy.*, 93 Wn.2d 843, 854, 613 P.2d 1148 (1980); *Leschi Imp. Coun. v. State Hwy. Comm'n*, 84 Wn.2d 271, 285, 525 P.2d 774, 804 P.2d 1 (1974). EIS adequacy involves the legal sufficiency of the data in the EIS. *Klickitat Cy.*, 122 Wn.2d at 633, 860 P.2d 390 (citing Richard L. Settle, THE WASHINGTON STATE ENVIRONMENTAL POLICY ACT: A LEGAL AND POLICY ANALYSIS § 14(a)(i) (4th ed. 1993)). Adequacy is assessed under the “rule of reason”, *Klickitat Cy.*, at 633, 860 P.2d 390, which requires a “reasonably thorough discussion of the significant aspects of the probable environmental consequences’ of the agency’s decision.” *Klickitat Cy.*, at 633, 860 P.2d 390 (quoting *Cheney v. Mountlake Terrace*, 87 Wn.2d 338, 344-45, 552 P.2d 184 (1976)). The court will give the agency determination substantial weight. RCW 43.21C.090.¹

¹ *Weyerhaeuser v. Pierce Cty.*, 124 Wn.2d 26, 37 – 38, 873 P.2d 498, 504 (1994).

The Draft EIS contains no information on or analysis of the development capacity of the alternatives, violating the *Ullock* decision and Washington State Environmental Policy Act (SEPA).

In addition to rule of reason, the adequacy of an EIS is defined the Washington State Environmental Policy Act (SEPA) rules and court decisions that have applied to the rule of reason to specific situations. WAC 197-11-440(5) requires the presentation and analysis of alternatives. WAC 197-11-440(6)(a) requires that for the elements of the environment significantly affected by the proposed action, “the EIS shall describe the existing environment that will be affected by the proposal, analyze significant impacts of alternatives including the proposed action, and discuss reasonable mitigation measures that would significantly mitigate these impacts.” In the *Ullock* decision, the Court of Appeals held “that an EIS is adequate in a nonproject zoning action where the environmental consequences are discussed in terms of the maximum potential development of the property under the various zoning classifications allowed.”²

1 Unfortunately, the Draft EIS contains no data on the capacity of the different zoning alternatives and the impacts the increased capacity will cause. In a few places the EIS generally describes some changes in capacity. For example,

The TCTR and UCOR zones will both allow for unlimited densities and increase the minimum density to 20 and 12 units per acre, respectively. The maximum density of the NCOR will increase to 25 units per acre and will significantly increase the density from the Moderate-Density Single-Family zoning adjacent to the Corridors. Alternatives 1 and 2 will also increase the allowable height in the TCTR zone, which will be higher than the zones it is replacing.³

However, the Draft EIS never discloses the residential and employment capacities for the above changes and the alternatives as a whole.⁴ The Draft EIS never analyzes the impacts “in terms of the maximum potential development of the property under the various zoning classifications allowed” as the *Ullock* decision requires for an adequate EIS.⁵

Instead Alternatives 1, 2, and 3 are analyzed based on assumed levels of growth. “Alternative 1 is assumed to result in approximately 2,646 additional housing units beyond the 18,180 housing units expected by 2040 under current zoning.”⁶ “Alternative 2 is assumed to result in approximately 3,426

² *Ullock v. City of Bremerton*, 17 Wn. App. 573, 580, 565 P.2d 1179, 1184 (1977).

³ Pierce County, *Non-Project Draft Environmental Impact Statement Community Plan Updates: Frederickson, Mid-County, Parkland-Spanaway-Midland and South Hill Community Plans* p. 116 (April 2019). See also *Id.* at pp. 21 – 22 for a general description of the zones, but again no information on the capacity of the zones.

⁴ *Id.* at p. 46, p. 49, p. 53, & pp. 38 – 59.

⁵ *Ullock v. City of Bremerton*, 17 Wn. App. 573, 580, 565 P.2d 1179, 1184 (1977).

⁶ Pierce County, *Non-Project Draft Environmental Impact Statement Community Plan Updates: Frederickson, Mid-County, Parkland-Spanaway-Midland and South Hill Community Plans* p. 96 (April 2019).

↑ additional housing units beyond the 18,180 housing units expected by 2040 under current zoning.”⁷ Alternative 3 “is expected to add less growth than that assumed under Alternative 1 or 2.”⁸ Even for the no action alternative, the Draft EIS fails to disclose the capacity.⁹ The Draft EIS assumes job growth “is not expected to differ substantially from job normal job growth under existing zoning.”¹⁰ There is a brief discussion of how the residential assumptions were determined, but no data on pages 94 and 95. The basis for all of these assumptions is not adequately substantiated using data, especially because the capacity is not disclosed. In sum, the Draft EIS is inadequate under the rule of *Ullock*.¹¹

The Draft EIS also fails the rule of reason because the lack of capacity data and analysis of the impacts of those changes in capacity is not a “‘reasonably thorough discussion of the significant aspects of the probable environmental consequences’ of the agency’s decision.”¹² Given that one of the two objectives of the Community Plan Updates are to “adjust zoning to reflect property owner requests and changes in development patterns and community goals” a lack of data on the changes in zoning capacity is a major flaw in the Draft EIS.¹³

1 To rectify these flaws, the EIS needs to disclose the changes in zoning capacity. It also needs to document using actual data how the assumed levels of growth were determined. As the supreme court has written “[i]n determining whether a particular discussion of environmental factors in an EIS is adequate under the rule of reason, the reviewing court must determine whether the environmental effects of the proposed action are sufficiently disclosed, discussed, and substantiated by supportive opinion and data.”¹⁴ Here, no data support the assumptions. Unsupported assumptions do not meet this standard. Therefore, the Draft EIS is inadequate.

The failure to disclose the capacity of the alternatives and the factual basis for the housing and employment assumptions means that the disclosure of impacts of aspects of the built and natural environment that depend at least in part on the number of housing units, people, and jobs are also inadequate. These elements of the environment include land use and built environment, plans and policies, public services and utilities, air quality, ground and surface water, and transportation.¹⁵ We have additional comments on the analysis of these impacts on the elements of the environment below.

⁷ *Id.* at p. 101.

⁸ *Id.* at p. 106

⁹ *Id.* at p. 107.

¹⁰ *Id.* at p. 94.

¹¹ *Ullock v. City of Bremerton*, 17 Wn. App. 573, 580, 565 P.2d 1179, 1184 (1977).

¹² *Weyerhaeuser v. Pierce Cty.*, 124 Wn.2d 26, 37 – 38, 873 P.2d 498, 504 (1994).

¹³ Pierce County, *Non-Project Draft Environmental Impact Statement Community Plan Updates: Frederickson, Mid-County, Parkland-Spanaway-Midland and South Hill Community Plans* p. 2 (April 2019).

¹⁴ *Klickitat Cty. Citizens Against Imported Waste v. Klickitat Cty.*, 122 Wn.2d 619, 644, 860 P.2d 390, 404 (1993), as amended on denial of reconsideration (Jan. 28, 1994), amended, 866 P.2d 1256 (1994).

¹⁵ See for example the lack of specificity on how the magnitude of the capacities differ across the alternatives at Pierce County, *Non-Project Draft Environmental Impact Statement Community Plan Updates: Frederickson, Mid-County, Parkland-Spanaway-Midland and South Hill Community Plans* pp. 55 – 58 (April 2019).

The Draft EIS does not analyze the land use and transportation impacts of the increases in zoning capacity on adjacent and nearby cities as SEPA requires.

In *Barrie v. Kitsap County* the Washington State Supreme Court held that a county EIS for a shopping center was invalid because it did not adequately analyze the impacts on downtown Bremerton.¹⁶ The court wrote that “[b]ecause experts disagree on the possible effects, the statement should set forth the responsible opposing views rather than ignoring the potential debilitating impact.”¹⁷ In *Cathcart-Maltby-Clearview Community Council v. Snohomish County*, the Washington State Supreme Court wrote that SEPA “mandates that extra-jurisdictional effects be addressed and mitigated, when possible.”¹⁸ The Supreme Court explained that:

In *Save*, an EIS was considered deficient, and the zoning approval invalidated, because the EIS failed to address the extra-jurisdictional consequences of a proposed shopping center. Similarly, in *Barrie*, the zoning approval and EIS were invalid because of the failure to assess, and to attempt some mitigation of, the impact of a shopping center on a downtown business district.¹⁹

In *Save*, the extra-jurisdictional consequences included serious increased traffic congestion and need expend millions of dollars of local, state and federal funds to construct needed transportation facilities.²⁰

The areas proposed for upzoning abut Tacoma and Puyallup.²¹ The traffic modeling relies on transportation projects in both cities.²² The Draft EIS does not even attempt to determine whether the upzones will divert residential and employment growth from Tacoma, Puyallup, or other nearby cities and the effects this would have on those cities.²³ The Draft EIS does not attempt to analyze the transportation impacts on Tacoma, Puyallup, or other nearby cities or the state highway system.²⁴ There is no attempt to mitigate the land use or transportation impacts on the cities or the state highway system as SEPA requires. These failures violate the rules of *Barrie* and *Save*. Again, the Draft EIS is inadequate.

¹⁶ *Barrie v. Kitsap Cty.*, 93 Wn.2d 843, 859, 861, 613 P.2d 1148, 1157 – 58 (1980).

¹⁷ *Barrie*, 93 Wn.2d at 859, 613 P.2d at 1157.

¹⁸ *Cathcart-Maltby-Clearview Cmty. Council v. Snohomish Cty.*, 96 Wn.2d 201, 209, 634 P.2d 853, 858 – 59 (1981).

¹⁹ *Cathcart-Maltby-Clearview Cmty. Council v. Snohomish Cty.*, 96 Wn.2d 201, 209, 634 P.2d 853, 859 (1981).

²⁰ *Save a Valuable Env't (SAVE) v. City of Bothell*, 89 Wn.2d 862, 868, 576 P.2d 401, 405 (1978).

²¹ Pierce County, *Non-Project Draft Environmental Impact Statement Community Plan Updates: Frederickson, Mid-County, Parkland-Spanaway-Midland and South Hill Community Plans* p. 23 (April 2019).

²² *Id.* at p. 89.

²³ *Id.* at pp. 38 – 59.

²⁴ *Id.* at pp. 93 – 113.

Section 3.1 Land Use and Built Environment needs to adequately analyze and describe the land use impacts of the alternatives.

3 The Draft EIS, on page 55, states that “Alternatives 1 and 2 would generally focus the majority of future growth into compact areas around major transportation corridors, which are characterized by improved access to services and potentially redevelopable parcels.” This is not the case. Alternatives 1 and 2, and Alternative 3, will disperse growth over large parts of the community plan areas within the urban growth area (UGA).²⁵ This can be seen from the large upzones from the Residential Resource (RR) and the Single-Family (SF) zones to Moderate-Density Single-Family (MSF). In Alternative 1, 2,771.62 acres will be rezoned from RR to MSF.²⁶ An additional 1,857.10 acres will be rezoned from SF to MSF.²⁷ In Alternative 2, 2,684.36 acres will be rezoned from RR to MSF.²⁸ An additional 1,770.71 acres will be rezoned from SF to MSF.²⁹ In Alternative 3, 2,773.80 acres will be rezoned from RR to MSF.³⁰ An additional 1,859.74 acres will be rezoned from SF to MSF.³¹ In each of these alternatives, the capacity of lower density zones will be increased by thousands of housing units. These rezones are spread over larger areas.³² This not an effective growth focusing strategy and growth will not be focused into centers.

4 While the Draft EIS describes earlier and ongoing efforts to increase compatibility with Joint Base Lewis McChord, it does not evaluate the compatibility of each of the alternatives with the base.³³ This analysis is important because Alternatives 1, 2, and 3 upzone land right next to the base.³⁴ Compatibility with the base is a very important land use issue. It is also an important economic issue for the county and state. The EIS needs to evaluate the alternatives for compatibility with Joint Base Lewis McChord.

5 Alternatives 1, 2, and 3, upzone land uphill from the Puyallup Valley farmland north and east of the study area.³⁵ There have already been adverse impacts from uphill development on the agricultural valleys including increased runoff and land use incompatibilities from uphill uses. But the Draft EIS contains no analysis of these impacts. This is necessary for an adequate EIS.

Given the many inadequacies of the land use analysis, the statement on page 59 that “[n]o significant unavoidable land use impacts are anticipated under any Alternative” is not accurate. This section of the Draft EIS is inadequate.

²⁵ Pierce County, *Non-Project Draft Environmental Impact Statement Community Plan Updates: Frederickson, Mid-County, Parkland-Spanaway-Midland and South Hill Community Plans* pp. *223 -234 (April 2019).

²⁶ *Id.* at p. *225.

²⁷ *Id.*

²⁸ *Id.* at p. *229.

²⁹ *Id.*

³⁰ *Id.* at p. *234.

³¹ *Id.*

³² *Id.* at p. *223, p. *227, p. p. *232.

³³ *Id.* at pp. 55 – 58.

³⁴ *Id.* at p. *223, p. *227, p. p. *232.

³⁵ *Id.*

Section 3.2 Plans and Policies needs to better analyze and describe the impacts on the regional growth strategy.

Vision 2040 was approved by Pierce County, the cities in the county, and the cities and counties in the four-county region. The Vision 2040 Regional Growth Strategy includes numbers by regional geographies which contain “specific guidance for the distribution of growth.”³⁶ The VISION 2040 Regional Growth Strategy allocates 21 percent of the region’s population growth from 2000 to 2040, 81,000 people, to the unincorporated Pierce County urban growth areas.³⁷ The VISION 2040 Regional Growth Strategy allocates ten percent of the region’s employment growth from 2000 to 2040, 22,000 jobs, to the unincorporated Pierce County urban growth areas.³⁸

6 The *Pierce County Buildable Lands Report* identified a 2030 estimated housing capacity of 40,058 housing units for unincorporated urban Pierce County.³⁹ Comparing the population and housing targets in Pierce County Ordinance No. 2011-36s, which adopted the population and housing targets, yields a factor of 2.359963 to convert from housing units to population.⁴⁰ Based on this factor, there is a capacity of 94,535 people in unincorporated urban Pierce County. The *Pierce County Buildable Lands Report* identified a 2030 estimated employment capacity of 30,118 for unincorporated urban Pierce County.⁴¹ Both of these capacities are significantly higher than the Vision 2040 Regional Growth Strategy allocation, but this impact was not disclosed in the Draft EIS and no mitigation was proposed.

The Draft EIS also did not analyze whether any of the four alternatives is consistent with the Regional Growth Strategy considering the growth already allocated to the other unincorporated UGAs in the county.⁴² However, “Alternative 1 is assumed to result in approximately 2,646 additional housing units beyond the 18,180 housing units expected by 2040 under current zoning.”⁴³ “Alternative 2 is assumed to result in approximately 3,426 additional housing units beyond the 18,180 housing units expected by 2040 under current zoning.”⁴⁴ So, unless there will be reductions in capacity elsewhere in the unincorporated UGAs, those alternatives are not consistent with the Regional Growth Strategy. Given this failure of analysis, it is not possible to make the statement on page 78 that “[t]here are no significant adverse impacts resulting from any inconsistency with adopted state, regional, countywide, County Comprehensive Plan, or community plans policies.” So,

³⁶ Puget Sound Regional Council, *Vision 2040 Part II: Regional Growth Strategy* p. 17 (Dec. 2009) accessed on May 15, 2019 at: <https://www.psrc.org/vision-2040-documents>.

³⁷ *Id.* at p. 19.

³⁸ *Id.*

³⁹ Pierce County Planning and Land Services, *Buildable Lands Report* p. 246 (June 30, 2014) accessed on May 20, 2019 at: <https://www.co.pierce.wa.us/DocumentCenter/View/30444/Final-Draft-2014-Pierce-County-Buildable-Lands-Report?bidId=> and cited pages enclosed in a separate email.

⁴⁰ Pierce County Ordinance No. 2011-36s Exhibit A to Ordinance No. 2011-36s pp. 1 – 2 of 3 accessed on May 20, 2019 at: <https://online.co.pierce.wa.us/cfapps/council/model/otDocDownload.cfm?id=1493708&fileName=2011-36s%20signed%20final.pdf> and enclosed in a separate email.

⁴¹ Pierce County Planning and Land Services, *Buildable Lands Report* p. 247 (June 30, 2014).

⁴² Pierce County, *Non-Project Draft Environmental Impact Statement Community Plan Updates: Frederickson, Mid-County, Parkland-Spanaway-Midland and South Hill Community Plans* pp. 60 – 78 (April 2019).

⁴³ *Id.* at p. 96 (April 2019).

⁴⁴ *Id.* at p. 101.

6 ↑ the EIS is inadequate for failing to analyze consistency with the Regional Growth Strategy and failing to disclose the results of that analysis.

7 The Draft EIS, on pages 77 and 78, opines “Alternatives 1 and 2 would be more consistent with regional, countywide and Comprehensive Plan policies to direct growth to centers, particularly the County’s Comprehensive Plan policy to designate Centers/Central Places and Transit-Oriented Corridors.” This is incorrect. First, as discussed above there is no analysis in the Draft EIS as to whether Alternatives 1, 2, and 3 will shift growth from regionally designated centers such as the Puyallup centers, the Tacoma Mall, Downtown Tacoma, or other regional centers.⁴⁵ Second, the only regionally designated center in the study area is the Frederickson Manufacturing/Industrial Center.⁴⁶ There are no regional growth centers in the study area.⁴⁷

8 Another issue with this Section is that the Draft EIS fails to analyze the consistency and compatibility of the alternatives with the Frederickson Manufacturing/Industrial Center and the county and regional policies for that center.⁴⁸ This is a major deficiency given the importance of the Frederickson Manufacturing/Industrial Center to regional and county policy and the county and regional economies.

The EIS needs to be better substantiate that the long list of transportation projects included in the traffic analysis and the other unfunded projects can be funded over the next 20 years to rely on them for transportation modeling and analysis.

9 ↓ The Draft EIS states that “[f]urthermore, each community plan proposes a set of transportation projects which—while currently unfunded—have been included in the traffic analysis as reasonably foreseeable in the next 20 years”⁴⁹ These projects quite extensive and will be costly.⁵⁰ Pierce County’s current transportation element has a \$151,400,000 deficit.⁵¹ Given this deficit and the many projects proposed in the community plan update, the EIS needs to substantiate that these projects can be funded. As the supreme court has written “[i]n determining whether a particular discussion of environmental factors in an EIS is adequate under the rule of reason, the reviewing court must determine whether the environmental effects of the proposed action are sufficiently disclosed, discussed, and substantiated by supportive opinion and data.”⁵² Here there is no data and no basis for the opinion that all of these projects can be funded especially in the light of the current \$151

⁴⁵ Puget Sound Regional Council, *Vision 2040 Part II: Regional Growth Strategy* p. 18 (Dec. 2009)

⁴⁶ *Id.*

⁴⁷ *Id.*

⁴⁸ Pierce County, *Non-Project Draft Environmental Impact Statement Community Plan Updates: Frederickson, Mid-County, Parkland-Spanaway-Midland and South Hill Community Plans* pp. 60 – 78 (April 2019).

⁴⁹ *Id.* at p. 88.

⁵⁰ *Id.* at pp. 90 – 92.

⁵¹ *Comprehensive Plan Pierce County, Washington* Transportation Technical Sections pp. 12-66 – 12-67 (June 30, 2016) accessed on May 15, 2018 at: <https://www.co.pierce.wa.us/950/Comprehensive-Plan>.

⁵² *Klickitat Cty. Citizens Against Imported Waste v. Klickitat Cty.*, 122 Wn.2d 619, 644, 860 P.2d 390, 404 (1993).

million transportation element deficit. In fact, the Draft EIS does not include any analysis of revenues to fund the transportation projects. This is a significant deficiency of the EIS.

In addition, the mitigation section on page 112 states that “[f]urther, each community plan includes a list of future transportation projects that may alleviate demand that the alternatives add on the transportation system.” WAC 197-11-440(6)(c)(iii) provides “[c]learly indicate those mitigation measures (not described in the previous section as part of the proposal or alternatives), if any, that could be implemented or might be required, as well as those, if any, that agencies or applicants are committed to implement.” In which category do the community plan proposed transportation projects fit? The EIS needs to make this clear as WAC 197-11-440(6)(c)(iii) requires.

Related to this concern is what other projects will be included as mitigation. The Draft EIS on page 101 states that for Alternative 1:

New sidewalks, bicycle facilities, crosswalks, traffic signals, and other pedestrian and bicycle improvements will likely be made in the future as part of future transportation projects discussed previously. New development will provide walkways and other active transportation amenities, as appropriate. With regional transit becoming more critical to mobility for those residents commuting outside Pierce County, future growth will need to be accommodated by those services.

Similar statements are made for Alternatives 2 and 3.⁵³ These projects are used to support conclusions that these alternatives will not result significant adverse impacts on transit and active transportation.⁵⁴ These projects are mentioned in the mitigation section on page 112. But again, it is unclear which category of mitigation identified in WAC 197-11-440(6)(c)(iii) these projects fit in. This needs to be clarified for the decision makers. We do appreciate that the Draft EIS is clear that additional transit service, including High Capacity Transit, is the could be implemented category.⁵⁵

Given the lack of funding for the transportation projects proposed in the community plan updates which are used in the transportation modeling, the contingent nature of the active transportation and transit projects and services, the transportation element deficit, and the lack of analysis of potential funding, the Draft EIS conclusion, on page 113, that “[n]o significant unavoidable transportation impacts are anticipated under any Alternative” is not substantiated by supportive opinion and data as SEPA requires.⁵⁶ The Draft EIS is inadequate.

⁵³ Pierce County, *Non-Project Draft Environmental Impact Statement Community Plan Updates: Frederickson, Mid-County, Parkland-Spanaway-Midland and South Hill Community Plans* pp. 106 – 07 (April 2019).

⁵⁴ *Id.* at p. 101, p. 106, p. 107.

⁵⁵ *Id.* at p. 113.

⁵⁶ *Klickitat Cty. Citizens Against Imported Waste v. Klickitat Cty.*, 122 Wn.2d 619, 644, 860 P.2d 390, 404 (1993).

The lack of Funding for Public Services and Utilities, including Sheriff Services, mean the conclusion that “[n]o significant unavoidable transportation impacts are anticipated under any Alternative” is not substantiated.

10 The Draft EIS concludes that additional funding is needed for Fire Services, Parks and Recreation, Pierce County Sheriff services, and school facilities and services. But the Draft EIS lacks an analysis of funding plans. This means that the Draft EIS conclusions that “[n]o significant unavoidable ... impacts are anticipated under any Alternative” are not substantiated by supportive opinion and data as SEPA requires.⁵⁷

The EIS must analyze the greenhouse gas pollution to be generated by the alternatives.

11 Futurewise commented on the scope of the EIS and requested that the greenhouse gas pollution generated by the alternatives be analyzed. SEPA EISs are required to analyze greenhouse gas pollution. As the Shorelines Hearings Board concluded, “because it failed to fully analyze the impacts of greenhouse gas emissions from the Project and to consider whether additional mitigation is required, the Final EIS is remanded to Cowlitz County and the Port for further SEPA analysis consistent with this opinion.”⁵⁸

Unfortunately, the Draft EIS only analyzed the impacts on the criteria pollutants, not other air pollutants including greenhouse gas pollutants.⁵⁹ Because of the failure to analyze greenhouse gas emissions, the Draft EIS not adequate.⁶⁰

The analysis and mitigation in Section 3.6 Groundwater and Surface Water, Shorelines, Wetlands, and Flooding is inadequate.

12 As was documented in the comments on Section 3.1, because of the Moderate-Density Single-Family (MSF) upzones, Alternatives 1 and 2 do not effectively concentrate growth. So, the claim

⁵⁷ *Klickitat Cty. Citizens Against Imported Waste v. Klickitat Cty.*, 122 Wn.2d 619, 644, 860 P.2d 390, 404 (1993).

⁵⁸ *Columbia Riverkeeper, Sierra Club, and Center For Biological Diversity v. Cowlitz County, Port of Kalama, Northwest Innovation Works-Kalama, LLC, and State of Washington, Department of Ecology*, Shorelines Hearings Board (SHB) No. 17-010c, Order on Motions for Partial Summary Judgment (Sept. 15, 2017), at 18, 2017 WL 10573749, at *9.

⁵⁹ Pierce County, *Non-Project Draft Environmental Impact Statement Community Plan Updates: Frederickson, Mid-County, Parkland-Spanaway-Midland and South Hill Community Plans* pp. 153 – 61 (April 2019).

⁶⁰ *Columbia Riverkeeper, Sierra Club, and Center For Biological Diversity v. Cowlitz County, Port of Kalama, Northwest Innovation Works-Kalama, LLC, and State of Washington, Department of Ecology*, Shorelines Hearings Board (SHB) No. 17-010c, Order on Motions for Partial Summary Judgment (Sept. 15, 2017), at 18, 2017 WL 10573749, at 10.

that the alternatives will concentrate growth that is will mitigate storm water impacts is not substantiated.⁶¹

We do appreciate the Draft EIS identifies the impacts of the Residential Resource (RR) and Single Family (SF) to Moderate-Density Single Family (MSF) rezones have the potential to adversely affect streams and wetlands.⁶² The increase in impervious surfaces and reduction in native vegetation, however, will increase adverse impacts on streams and wetlands so we disagree that there will be no adverse impacts.

We are particularly concerned about impacts on the Puyallup River and its tributaries. A 2018 analysis by the National Oceanic and Atmospheric Administration and the State of Washington Department of Fish and Wildlife ranked the fall Chinook stocks that originate in the Puyallup River highest in importance as food sources for the southern resident killer whales.⁶³ The Southern resident orcas, or killer whales, are threatened by (1) an inadequate availability of prey, the Chinook salmon, “(2) legacy and new toxic contaminants, and (3) disturbance from noise and vessel traffic.”⁶⁴ “Recent scientific studies indicate that reduced Chinook salmon runs undermine the potential for the southern resident population to successfully reproduce and recover.”⁶⁵

12 Orcas, the salmon, and Puget Sound continue to be adversely impacted by storm water and the adverse impacts of new development. A recent peer-reviewed article concluded that:

Chinook salmon were less likely to occur and were less abundant in estuaries with greater pollution stress. They were also less abundant in estuaries with greater flow stress, although this relationship was marginally insignificant. English sole were less abundant in estuaries with greater land cover stress. Together, we provide new empirical evidence that effects of stressors on two fish species culminate in detectable trends along the northeast Pacific coast, elevating the need for protection from pollution, land cover, and flow stressors to their habitats.⁶⁶

Urbanization results in pollution stress, flow stress, and land cover stress. In Futurewise’s scoping comments we identified impacts on the Chinook and orcas as impacts that need to be analyzed in the EIS. No such analysis was included. This is a significant deficiency in the Draft EIS.

⁶¹ Pierce County, *Non-Project Draft Environmental Impact Statement Community Plan Updates: Frederickson, Mid-County, Parkland-Spanaway-Midland and South Hill Community Plans* p. 167 (April 2019).

⁶² *Id.* at p. 176.

⁶³ National Oceanic and Atmospheric Administration and the State of Washington Department of Fish and Wildlife, *Southern Resident Killer Whale Priority Chinook Stocks* p. 6 (June 22, 2018) accessed on May 17, 2018 at: <https://www.documentcloud.org/documents/4615304-SRKW-Priority-Chinook-Stocks.html> and enclosed with this letter.

⁶⁴ State of Washington Office of the Governor, Executive Order 18-02 Southern Resident Killer Whale Recovery and Task Force p. 1 (March 14, 2018) last accessed on May 13, 2019 at: https://www.governor.wa.gov/sites/default/files/exe_order/eo_18-02_1.pdf.

⁶⁵ *Id.*

⁶⁶ Jason D. Toft, Stuart H. Munsch, Jeffery R. Cordell, Kiira Siitari, Van C. Hare, Brett M. Holycross, Lisa A. DeBruyckere, Correigh M. Greene, Brent B. Hughes, *Impact of multiple stressors on juvenile fish in estuaries of the northeast Pacific* 24 GLOB CHANGE BIOL. 2008, p. 2008 (DOI: 10.1111/gcb.14055: 2018) accessed on May 17, 2019 at: <https://onlinelibrary.wiley.com/doi/abs/10.1111/gcb.14055>.

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In sum, our analysis of the Draft EIS is that it is inadequate as a matter of law. It is also my opinion as a professional planner who has contributed to National Environmental Policy Act (NEPA) and SEPA EISs and who has taught college level classes on SEPA and NEPA. We recommend that it be redone.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 Ext. 102 and email: tim@futurewise.org.

Very Truly Yours,

A handwritten signature in blue ink, consisting of two stylized, overlapping loops that resemble the letters 'S' and 'T'.

Tim Trohimovich, AICP
Director of Planning & Law

Enclosures

Response to Futurewise (Letter 11)

Comment 1

The growth forecasts provided in Section 3.3.2 are reasonable estimates of the level of development that is probable in the next 20 years under the proposed zoning classifications. These forecasts were guided by the Growth Management Act, which requires a land capacity analysis, and states that “the zoned capacity of land alone is not a sufficient standard to deem land suitable for development or redevelopment within the twenty-year planning period” (RCW 36.70A.215 (3)(a)). In summary, these forecasts reflect a reasonable level of potential development over the next 20 years, but not the ultimate zoned development capacity, which is improbable, and disregards other reasonable factors considered in the DEIS.

Following publication of the DEIS, Pierce County hired a third-party consultant to conduct an independent market analysis of residential growth that may be expected under Alternative 1, as detailed in the 2020 Pierce County Housing Market Study in Appendix B: References. The Housing Market Study determined Alternative 1 may result in up to 2,020 additional housing units by 2040, which is less than the 2,646 additional units forecasted in the DEIS for Alternative 1. The DEIS analysis remains adequate, with the original impact analysis encompassing the lower potential impacts that may be expected based on the Housing Market Study findings.

The Non-Project DEIS presented a general analysis of probable impacts consistent with WAC 197-11-442. This high-level analysis was appropriate, as the Community Plan Updates DEIS was prepared as a non-project EIS under Phased Review per WAC 197-11-060(5) and WAC 197-11-776, which allows lead agencies the ability to cover general matters in broader environmental documents with subsequent narrower documents concentrating solely on the issues specific to the later analysis. In this context, the County is afforded more flexibility in preparing a Non-Project EIS for long-range planning because there is less detailed data regarding environmental impacts and any subsequent projects (WAC 197-11-442(1)). Furthermore, WAC 197-11-443(2) specifies that “a nonproject proposal may be approved based on an EIS assessing its *broad* impacts” (emphasis added). Future projects that may arise with respect to the Community Plan Updates non-project proposal will be subject to appropriate review under the State Environmental Policy Act (SEPA). Phased review is appropriate where, as here, “the magnitude of project, the length of time over which it will evolve, and the multiplicity of variables” makes it “extremely difficult to assess its full impact.”³ No specific project is proposed or under consideration. Additional SEPA analysis will occur when any project-specific permit application is submitted, and more data becomes available.

³*Cathcart-Maltby-Clearview Community. Council v. Snohomish County*, 96 Wn.2d 201, 210, 634 P.2d 853 (1981).

Comment 2

The Non-Project DEIS presented a general analysis of probable impacts consistent with WAC 197-11-442. This high-level analysis was appropriate, as the Community Plan Updates DEIS was prepared as a non-project EIS under Phased Review per WAC 197-11-060(5) and WAC 197-11-776, which allows lead agencies the ability to cover general matters in broader environmental documents with subsequent narrower documents concentrating solely on the issues specific to the later analysis. Furthermore, WAC 197-11-443(2) specifies that “a nonproject proposal may be approved based on an EIS assessing its *broad* impacts” (emphasis added). Future projects that may arise with respect to the Community Plan Updates non-project proposal will be subject to appropriate review under the State Environmental Policy Act (SEPA).

As such, the traffic analysis presented in the DEIS was correspondingly broad. Further, it would be unreasonable to make assumptions on impacts to other jurisdictions due to the uncertain nature of zoning and development. However, with the EIS having been prepared as the first part of a phased SEPA review, future project-level environmental analysis will be necessary. It is through this future review that any probable impacts to other jurisdictions, including those related to transportation and land use, will be analyzed as appropriate for future projects.

The potential for the alternatives to “divert residential and employment growth from Tacoma, Puyallup, or other nearby cities” is highly speculative and is not considered a probable outcome, and thus not required to be discussed in the EIS (WAC 197-11-060(4)(a)); The FEIS need not discuss every possible scenario or conduct a “worst case analysis.”⁴ In addition, no specific corresponding effects on those cities were mentioned in the comment, so the comment is not specific enough for further response.

The claim that the Non-Project DEIS “violates the rules of *Barrie*⁵ and *Save*” is misplaced. Unlike the non-project, high-level analysis here, these cases involved municipal environmental review of site-specific rezones in conjunction with major shopping center development proposals. The court in *Barrie* found Kitsap County’s EIS inadequate because it overlooked alternative regional shopping center sites and failed to address, or offer mitigation of, impacts to a downtown business and communities.⁶ In *Save*, the court invalidated the City of Bothell’s approval of a rezone to allow a major shopping center because the city completely disregarded environmental impacts of a shopping center outside its jurisdictional boundaries.⁷ In contrast to the non-project proposal, neither *Barrie*

⁴Solid Waste Alternative Proponents (SWAP) v. Okanogan County, 66 Wn.App. 439, 447-48, 882 P.2d 503.

⁵ *Barrie v. Kitsap County*, 93 Wn.2d 843, 613 P.2d 1148 (1980), *Save A Valuable Environment v. Bothell*, 89 Wn.2d 862, 576 P.2d 401 (1978).

⁶ *Barrie*, 93 Wn.2d at 855-857.

⁷ *Save*, 98 Wn.2d at 869-70.

nor *Save* involved phased environmental review of comprehensive plan amendments unrelated to site-specific development proposals.

Additionally, the reliance on *Cathcart-Maltby*⁸ for the claim that the County has failed an alleged SEPA requirement to consider traffic consequences on other jurisdictions is misplaced. The court in *Cathcart* upheld the county's phased EIS review because later environmental analysis would be performed for specific project development approvals and because of the difficulty of determining in the abstract (over a period of 25 years) the rate of project development, population growth, need for public services, and evolution of transportation technologies⁹. No specific project is proposed or under consideration. Additional SEPA analysis will occur when any project-specific permit application is submitted, and more data becomes available.

Finally, general transportation impacts on the state highway system within the study area were analyzed in the DEIS and several of the presented mitigations would apply to those highways.

Comment 3

Following publication of the DEIS, the large-scale rezones of Residential Resource (RR) and Single Family (SF) properties to Moderate-Density Single Family (MSF), comprising approximately 4,600 acres, were removed from the proposal. Thus, the rezone has been correspondingly removed from Alternative 1, Alternative 2, and Alternative 3.

Comment 4

Consistent with the broad assessment of impacts allowed in a non-project EIS, as discussed previously, land use compatibility issues with Joint Base Lewis-McChord (JBLM) were discussed broadly in Chapter 3.1 Land Use and Built Environment.

The following change (as highlighted) is made to DEIS Section 3.1.3 to further reduce any potential impacts resulting from the alternatives:

The height and density of occupancy limitations will continue to apply within the Thun Field AOI. With respect to JBLM, the Pierce County Comprehensive Plan (Policies LU-106.1-106.7) requires Pierce County to coordinate with JBLM on land use plans. Further, Pierce County Code restricts certain development from locating within the McChord Air Force Base AOI to minimize land use incompatibilities.

⁸ *Cathcart-Maltby-Clearview Community Council v. Snohomish*, 96 Wn.2d 201, 634 P.2d 853 (1981).

⁹ *Id.* at 210.

Comment 5

Consistent with the broad assessment of impacts allowed in a non-project EIS, as discussed previously, land use and water runoff impacts were discussed broadly in Chapter 3.1 and Chapter 3.6, respectively.

Comment 6

The Buildable Lands analysis is intended to determine whether the Urban Growth Area is large enough to accommodate the County's adopted 20-year housing and employment targets. These targets are derived from the Regional Growth Strategy. Thus, Pierce County is fully consistent with Vision 2040, as it can fully accommodate the adopted 20-year housing and employment targets within its existing growth capacity.

Regardless of the commenter's conclusion, exceeding Vision 2040 Regional Growth Strategy allocations is not inconsistent with any adopted plans and policies. In *West Seattle Defense Fund v. City of Seattle*¹⁰ the Growth Management Hearings Board determined that "...allowing a city to plan for even more growth than has been allocated to it by the county bolsters the [Growth Management Act's] first two planning goals by encouraging that city to accept in its comprehensive plan as much growth as it determines it can adequately accommodate..." Additionally, the Puget Sound Regional Council made the following finding in its certification¹¹ of Pierce County's most recent Comprehensive Plan update:

At the time of certification, the amount and rate of growth of the urban unincorporated area raised concerns regarding consistency with VISION 2040, which sees a larger portion of the unincorporated urban growth occurring within areas affiliated with cities. The county initially identified and evaluated a range of growth management strategies and subsequently initiated multiple planning efforts, including:

- Community plan updates (currently in process) that provide a combined land use and transportation strategy that redirects growth to a limited number of mixed-use centers that increase walkability and transit access.
- Decreasing the urban growth area in locations that are not encumbered with existing urban density, infrastructure improvements, or vested projects.
- Review of the county's vesting policy and consideration of termination of the application extension program.
- Review of the county's sewer exception program.

¹⁰ *West Seattle Defense Fund v. City of Seattle*, CPSGMHB Case No. 94-3-0016 FDO at 43-4 (04/04/1995).

¹¹ Appendix B: References, Puget Sound Regional Council Memorandum: Approve Full Certification of the Comprehensive Plan for Pierce County

Each of these initiatives has the potential to continue planning efforts in a manner consistent with Vision 2040 by supporting development where urban infrastructure is already in place and reducing the incentive to develop other portions of the urban UGA.

Therefore, the DEIS finding that no impacts on plans and policies remains adequate.

Comment 7

The centers in Alternatives 1 and 2 would be designated as Centers of Local Importance, as afforded by the Pierce County Countywide Planning Policies UGA-51 to UGA-58 and Comprehensive Plan Land Use Goals and Implementing Policies in LU-10 and LU-11.

Comment 8

Consistent with the broad assessment of impacts allowed in a non-project EIS, as discussed previously, plans and policies impacts were discussed broadly in Chapter 3.2 Plans and Policies. The DEIS was prepared as part of a phased SEPA review allowed by WAC 197-11-060(5) and WAC 197-11-776. So, later environmental review documents will assess plans and policies issues that concern specific geographic areas, like the Frederickson Manufacturing Industrial Center, as appropriate for the proposal.

Comment 9

The DEIS statement identified by the comment is inaccurate and has been deleted from DEIS Section 3.3.1 Planned Transportation Projects.

~~Furthermore, each community plan proposes a set of transportation projects which — while currently unfunded — have been included in the traffic analysis as reasonably foreseeable in the next 20 years; a full list of these projects may be found in the transportation section of each respective community plan.~~ Finally, potential future transit projects proposed by Sound Transit and Pierce Transit are provided in Table 3-16 Future (2040) Transit Projects.

The transportation projects listed in each community plan were not, in fact, included in the traffic impact analysis, but are rather one of the many mitigation measures identified in the Draft EIS. The only roadway projects factored into the analysis were those identified in the County's Traffic Impact Fee program, as listed in Tables 3-14 and 3-15. The results of the traffic analysis are not affected by this text deletion.

A shortfall certainly exists in financing 20 years of roadway projects specified in the TIF program and, as mentioned, these projects were used in the traffic analysis to determine future (2040) baseline conditions. Future baseline traffic levels may indeed vary somewhat from the results presented in the DEIS, depending on whether all roadway improvements listed in Tables 3-14 and 3-15 are eventually funded. With any type of model of future conditions, it stands to reason there will be some level of

uncertainty, such as whether certain transportation projects are fully funded. Regardless of any possible slight variations in future baseline traffic conditions, the DEIS finding stands that by 2040 the action alternatives would generally only contribute a small percentage of roadway traffic (approximately three to four percent) to certain County roadways and State highways in the study area.

Many of the transportation mitigation measures provided in the DEIS were general, which is permitted when part of a phased review of a non-project proposal. Due to the general and/or speculative nature of many of the mitigation measures, including those related to pedestrian and bicycle improvements as well as community plan roadway projects, these measures should be understood as those that "...could be implemented or might be required..." WAC 197-11-440(6)(c)(iii).

Comment 10

SEPA does not require an analysis of the technical feasibility or economic viability of identified mitigation measures. Instead, an EIS must only "indicate those mitigation measures...that could be implemented or might be required..." WAC 197-11-440(6)(c)(iii). Additionally, the EIS "provides information on the environmental costs and impacts," not purely fiscal, social, or economic considerations of public policy consistent with WAC 197-11-448(1) and (3).

Comment 11

An analysis of the alternatives' potential impacts on climate change is provided below as a new chapter to the DEIS.

3.9 Climate Change

This section analyzes how the alternatives may contribute to global climate change through greenhouse gas (GHG) emissions related to transportation and land uses. Transportation systems contribute to climate change primarily through the emissions of certain greenhouse gases (CO², CH⁴, and N²O) from nonrenewable energy (primarily gasoline and diesel fuels) used to operate passenger, commercial, and transit vehicles. Land use changes contribute to climate change through construction, operational use of electricity and natural gas, water demand, and waste production.

3.9.1 Affected Environment

Climate change is the changing of earth's climate resulting from natural fluctuations and human-caused activities, and greenhouse gases in the atmosphere are the primary contributor. With the spread of industrialization in the modern era, the human contribution to greenhouse gas emissions increased markedly, resulting in an artificial acceleration of planet-wide warming trends.

The principal GHGs of concern are CO², CH⁴, N²O, SF⁶, perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Each principal GHG has a long atmospheric lifetime (one year to several thousand years). In addition, the potential heat-trapping ability of each of these gases vary substantially. As such, these gases are standardized using CO² equivalents (CO² e), which reflects the relative potency of non-CO² GHGs and converts their quantities to an equivalent amount of CO² so that all emissions can be reported as a single quantity.

The primary human-made processes that release GHGs include combustion of fossil fuels (for transportation, heating, and electricity generation), agricultural practices that release CH⁴ through livestock production and crop residue decomposition, and industrial processes that release smaller amounts of high-potential global warming gases like SF⁶, PFCs, and HFCs. Deforestation and land cover conversion also contribute to climate change by reducing the earth's capacity to remove CO² from the air and altering the earth's albedo (surface reflectance), thereby allowing more solar radiation to be absorbed and retained.

Puget Sound Clean Air Agency (PSCAA) published a greenhouse gas inventory for the four counties under their jurisdiction. The report was revised in June 2018. The analysis shows the largest contribution to GHG emissions in Pierce County results from the built environment, followed by transportation. This is a pattern across the Puget Sound Region.

Washington has ongoing efforts to reduce GHGs as a climate change mitigation effort. The State Legislature adopted reduction targets for greenhouse gases in 2008. The current targets:

- By 2020, reduce overall emissions of greenhouse gases in the State to 1990 levels.
- By 2035, reduce overall greenhouse gas emissions in the State to 25 percent below 1990 levels.
- By 2050, reduce overall greenhouse gas emissions in the State to 50 percent below 1990 levels.

The Department of Ecology maintains the State's greenhouse gas inventory. In 2015, PSCAA completed an inventory focused on their four-county jurisdiction and the Agency Board adopted goals for GHG emissions reduction. The PSCAA goals differ in some target dates from the State.

- By 2030, reduce economy-wide greenhouse gases to 50 percent below 1990 levels.
- By 2050, reduce economy-wide greenhouse gases to 80 percent below 1990 levels.

3.9.2 Impacts

The scale of global climate change is so large that the impacts of one action can only be considered on a cumulative scale. It is not anticipated that a single development project or programmatic action, even at the scale of changing four community plans covering Pierce

County's central urban area, would have an individually discernible impact on global climate change. It is more appropriate to conclude that GHG emissions from future development resulting from the alternatives would combine with emissions across the state, country, and planet to cumulatively contribute to global climate change.

Construction

During development construction activities, diesel-powered demolition and construction equipment would emit GHGs. Other emissions during construction would result from trucks hauling construction materials to and from sites and from vehicle emissions generated during worker travel to and from construction sites. Construction-related GHG emissions from any given development project that may occur in the next 20 years would be temporary and would not represent an ongoing emissions burden. Therefore, climate change impacts related to transportation are not expected to be significant.

Transportation

As discussed in Chapter 3.3 of the DEIS, added development associated with each of the alternatives would result in some level of increased vehicle trips. These added vehicle trips would increase GHG emissions and potentially contribute to cumulative impacts on climate change. However, the GHG emissions from increased vehicle travel associated with the alternatives would not be significant contributors to cumulative climate change impacts.

Operations

The proposed action alternatives, to varying extents, would encourage redevelopment of existing properties by allowing more uses and/or higher residential densities. The newly-constructed buildings and uses would be subject to more stringent energy codes than those in the past, and the buildings would also take advantage of commonly used materials that are more climate-friendly and energy efficient compared to materials used for existing buildings. Therefore, climate change impacts related to operations are not expected to be significant.

3.9.3 Mitigation Measures

The mitigation measures in DEIS Chapter 3.3 Transportation would also mitigate transportation-related climate change impacts identified here.

3.9.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts are anticipated related to climate change.

Comment 12

Following publication of the DEIS, the large-scale rezones of Residential Resource (RR) and Single Family (SF) properties to Moderate-Density Single Family (MSF), comprising approximately 4,600 acres, were removed from the proposal. Thus, the rezone is removed from Alternative 1, Alternative 2, and Alternative 3 in the DEIS. Chapters 1 and 2 of the FEIS reflect the change, as highlighted.

The Community Plan Updates non-project proposal analyzed impacts to surface water, groundwater, wetlands, and shorelines broadly in Chapter 3.6, per WAC 197-11-443(2). Because the proposal does not entail specific projects and associated changes to impervious surfaces, and fish and wildlife habitats are highly location-specific, it was not reasonable to analyze probable impacts on specific habitat areas in the DEIS. However, the DEIS was prepared as part of a phased SEPA review allowed by WAC 197-11-060(5) and WAC 197-11-776. So, later environmental review documents will assess issues specific to that proposal, which may include an analysis of impacts on fish and wildlife habitats, as appropriate, including development proposals subject to the County's Critical Areas Ordinance (Title 18E – Development Regulations – Critical Areas) or other applicable law.

May 17, 2019

SUBMITTED VIA EMAIL:

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RE: Central Pierce Fire & Rescue Comments In Response To Non-Project DRAFT EIS, Pierce County Community Plan Updates (Frederickson, Mid-County, Parkland-Spanaway-Midland and South Hill); Issued April 5, 2019

Our Client: Central Pierce Fire & Rescue

To Whom It May Concern:

Pierce County has prepared a non-project Draft Environmental Impact Statement (DEIS) for the above referenced Community Plan updates ("Updates"). Central Pierce Fire & Rescue (herein referred to as "the District"), the fire and emergency response services responder to the area covered by the Update, submits the following comments.

1 ↓ It is critical, and fundamentally a necessary part of the SEPA review process, that the County specifically and thoroughly take a "hard look" at the potential impacts of projects that would be allowed as a result of the Updates. This is due to development facilitated by the Updates, which are likely to adversely affect the District's ability to maintain existing emergency response services to existing and future residents and businesses within the entire District, as well as the areas covered by the Updates within the District. In short, the County must, and preferably in

1 ↑ conjunction with the District, prepare and include a GMA compliant Capital Facility Plan for emergency and fire response services, including a financing plan over the twenty-year planning period. See RCW 36.70A.070.

2 ↓ The District is not anti-growth. However, any growth and development anywhere within the District that adversely affects the ability of the District's timely response to requests for service is a significant impact to the District and the residents of the District. Existing residents and businesses will be called upon to suffer a reduced level of service as additional demands are placed on existing services by development facilitated by the proposed Updates; in effect, existing residents are asked to subsidize this growth by accepting a reduced level of service.

District Background

The District is called upon to provide both fire suppression response, emergency medical response and first response care (Basic Life Support (BLS) and Advanced Life Support (ALS) first response and transport), rescues, as well as response to wildfire incidents, hazardous materials incidents, public service requests, and other demands. Full time paid personnel will respond from their assigned station or field work location when they are available. Response times vary depending on the location of the incident in relation to the location of the response crew. Responses for emergency medical care, again, vary depending on the incident type and location. For most medical emergencies, the minimal response for ALS events will be a medic unit and fire engine staffed with 5 paid personnel including 1-2 paramedics. The minimal response for BLS events is one fire engine with EMT trained fire response personnel.

3 ↓ Development that is likely to occur as a result of the Updates and associated development regulations will cause an upsurge in population, which in turn creates an escalated demand for service. These additional demands on service will cause an increase in the utilization of fire district facilities, apparatus and equipment. Currently, the fire district has an apparatus replacement plan based on current utilization. With the predicted increase in utilization, replacement planning will need to be modified to accommodate increased usage, resulting in additional mileage, and wear and tear on fire district apparatus and other capital. The District does not have sufficient mechanisms or funds to subsidize growth. Current residents should not bear the burden of replacement of apparatus and other capital sooner than the current scheduled replacement plan. The only means for acquiring additional funds to meet an accelerated acquisition and/or replacement plan would be to approve some form of alternate funding. Present available tax revenue is necessary to fund normal operations without growth. The two most common and appropriate means for financing the purchase of apparatus and equipment are board of fire commissioner approved debt, or voter approved debt. Commission approved debt must be repaid with funds accrued through regular property taxation. Taking revenues from operational funds to pay off debt would result in the District not being able to fund the necessary increases in predicted operational expenditures, such as increases in staffing, all resulting from the development that is likely to occur as a result of the Updates and associated development regulations.

↓ Further, should apparatus not be available to the District to respond, or the response time reflect a marked increase, and/or should apparatus inspections reflect abnormal wear or late replacement, the current insurance rating could be increased. Such increases mean a direct

3 impact to the property owner as the premium for fire insurance will increase commensurate with the increase in insurance rating. It may also lead to significant insurance cost increases to any project proponent and/or landowner upon occupancy. Once again, this impact to the citizens, residents and businesses should be part of any SEPA review process.

The District is prepared to immediately commence the development of a Capital Facility Plan consistent with RCW 36.70A.070(3) with Pierce County to be incorporated as part of the Updates, targeting completion prior to the end of this year.

SEPA Requirements for an EIS

An EIS must evaluate the likely impacts related to the project. WAC 197-11-060(4). Decision makers must provide a "detailed statement" of environmental impacts. RCW 43.21C.030(2)(c). SEPA requires full disclosure and "detailed" consideration of all affected environmental values. At its heart, SEPA is an "environmental full disclosure law." *Norway Hill Preservation*, 87 Wn.2d at 277. The *Norway Hill* court highlighted the legislature's intent that "environmental values be given full consideration in government decision making," and its decision to implement this policy through the procedural provisions of SEPA which "specify the nature and extent of the information that must be provided, and which require its consideration, before a decision is made." *Id.* at 277-78.

4 Environmental reviews under SEPA must identify significant impacts on the natural and built environment. WAC 197-11-440(6)(e). Such reviews must use sufficient information and disclose areas where information is speculative or unknown. WAC 197-11-080(1), (2). Where there is scientific uncertainty, Washington courts have required agencies to disclose responsible opposing views and resolve differences. These requirements feed into the ultimate standard of review for EISs, that adequacy is based on a "rule of reason." *Cheney v. Mountlake Terrace*, 87 Wn.2d 338, 344 (1976).

SEPA requires reasonably thorough information, disclosure and discussion, good data and analysis to support conclusions, and sufficient information to make a reasoned decision. *Klickitat County Citizens Against Imported Waste v. Klickitat County*, 122 Wn.2d 619, 633 (1993). Sufficiency of the data under the "rule of reason" standard requires a "reasonably thorough discussion of the significant aspects of the probable environmental consequences' of the agency's decision." *Weyerhaeuser v. Pierce Cnty.*, 124 Wn.2d 26, 38 (1994) (citations omitted).

SEPA requires an environmental impact statement ("EIS") for any action that has a "probable significant, adverse environmental impact." RCW 43.21C.031(1). "Significance means a reasonable likelihood of more than a moderate adverse impact on environmental quality." WAC 197-11-794. "A proposal's effects include direct and indirect impacts caused by the proposal. Impacts include those effects resulting from growth caused by a proposal, as well as the likelihood that the present proposal will serve as precedent for future actions." WAC 197-11-060(4)(d). The scope of impacts includes direct, indirect, and cumulative impacts. WAC 197-11-792. "The range of impacts to be analyzed in an EIS (direct, indirect, and cumulative impacts, WAC 197-11-792) may be wider than the impacts for which mitigation measures are required of applicants." WAC 197-11-060(4)(e). It is implicit in SEPA that an

"agency cannot close its eyes to the ultimate probable environmental consequences of its current action." *Cheney v. City of Mountlake Terrace*, 87 Wn.2d 338, 344 (1976).

Here, the County's SEPA Responsible Official is obligated to ensure that the County's SEPA processes assure that the DEIS thoroughly reviews and addresses the District's ability to provide for safety, fire and medical emergency responses throughout the District after development that is likely to occur as a result of the Updates and associated development regulations. Such analysis must include, and should have included, at a minimum, the following:

- (1) Analysis of the District's ability to provide fire and emergency response throughout the District upon the development of the projects that would be allowed under the Updates and associated development regulations through the 20-year planning period;
- (2) The capital, operational and financial requirements for the development of the projects that would be allowed under the Updates and associated development regulations;
- (3) A review of the District's operational and financial ability to continue to provide the applicable level of service, including fire response, emergency medical response, and transport services, not only to the development of the projects that would be allowed under the Updates and associated development regulations, but to all residents and taxpayers of the District after development of the project. This includes the existing deficiencies, and future added demands on service and capital caused by the development of the projects that would be allowed under the Updates and associated development regulations, as well as the opportunities that exist to either mitigate or fund those added demands of service from public funding sources and other means, including impact and/or other mitigation fees if necessary; and
- (4) The appropriate mitigation measures.

DEIS Inadequate SEPA Review

Here, the DEIS has failed to provide for that analysis, on any basis; the DEIS lacks any quantitative or qualitative analysis related to fire and emergency services. As it relates to fire and emergency response services, the DEIS fails to provide the necessary hard look and reasonably thorough discussion of environmental impacts. These shortcomings need to be rectified in a Supplemental DEIS so that the District may review and comment upon a reasonably thorough discussion of the environmental impacts of the proposal, rather than conduct the required analysis only as part of a final EIS, thereby depriving the District of the ability to comment on the analysis.

The DEIS at pages 114-118 provides a gross summary review of existing conditions without any meaningful or detailed analysis of the existing conditions or future post growth conditions. Indeed, the DEIS fails to even identify the applicable level of service within the District or the area covered by the Updates.

The existing condition within the District does not meet the District established service level objectives for fire response. As reported in the District's 2017 Annual Report of Service Level Objectives, The District is not meeting the response time goal for any category other than the full first alarm assignment at a fire suppression incident, where the response time is within 12 – 14 minutes on average with a goal of 16 minutes. A NFPA level of service for an urban area is a 4 – 6 minute response 90% of the time. This is measured from tires leaving the station to the first unit responding arriving at the scene. Presently, under this measure, the District fails to meet this level of service. The proposed urban environment with the apparent densification (zero lot line, building heights, etc. combined with additional traffic), further compromises the District's ability to meet the applicable levels of service.

5 All other areas are out of compliance with the level of service goal, including the arrival of fire units for emergency medical services, arrival of advanced life support, and arrival of first engine at fire suppression incidents are below standard. See attached 2017 Annual Report of Service Level Objectives.

The DEIS acknowledges at page 116 that additional traffic may affect District response times but provides no analysis of the quantitative or qualitative effect of increased traffic on District response times or level of service. When the existing conditions are not meeting the District's level of service objectives, the DEIS is not in compliance with SEPA's rigorous analysis standards when it concludes, without analysis, that with additional traffic and growth, the District's services, District residents, and business levels of service will not be significantly impacted by the growth facilitated by the Updates. This analysis was a necessary part of the DEIS and did not occur.

6 The DEIS suggests that future growth may warrant impact fees when the District(s) develop a Capital Facility Plan. However, again, it is the County that is obligated to adopt a GMA compliant Comprehensive Plan and to comply with the GMA when adopting the updates. In this regard it is the County that is obligated to engage with the District to develop a GMA compliant Capital Facility Plan. See RCW 36.70A, 36.70A.070. The District development of a Capital Facility Plan has no GMA relevance unless the County adopts that Capital Facility Plan. As indicated, the District is prepared to immediately engage in this Capital Facility Planning as part of the development of the Updates to incorporate the same in the County's Comprehensive Plan as part of the adoption of the Updates.

Even so, merely referencing a future GMA Capital Facility Plan in the DEIS is not a meaningful, thorough or detailed impact analysis as required under SEPA. Again, at a minimum, quantitative or qualitative analysis of the effects of the future development on District capital, operations, and response times within the entire District was required under SEPA.

7 The DEIS must analyze the effect of the growth on existing services, degradation/wear and tear on district capital, and future capital and operational requirements of the District to serve the existing growth.

8 As to potential mitigation measures, this discussion is equally bereft of the SEPA required detailed analysis.

7 The brief mitigation measure discussion at page 118 has an underlying false presumption that potential increased tax revenue from new construction will be sufficient for the capital and other requirements to meet new demands for fire and emergency response services. Forecasting future service requirements is a far more detailed analysis than a summary two-sentence statement. This analysis that should have been included in the DEIS requires an analysis of existing conditions, forecasting future demands, potential future facilities, and a forecast of future revenue, at a minimum. The DEIS included this analysis in regard to traffic impacts, but failed to include this analysis in regard to vital public emergency response services that are material to sustaining life and public safety.

The District is concerned that it will be unable to meet the capital requirements, as well as operations, to serve an urban environment that is a half mile wide and over 25 miles long, even with future tax revenues and bond-financed capital.

8 Further, the District is unaware of a precedence for this geographical layout across the State of Washington. As a result, it is very difficult to forecast and determine operational sustainability with this kind of planning, nor have we been provided any analysis of the same.

It is simply inconceivable that the DEIS could reach a conclusion without a thorough hard look analysis that no significant unavoidable adverse impacts to fire services are anticipated. See Page 118 of the DEIS.

Separate from the DEIS's lack of thorough and adequate analysis of the impacts of development that are likely to occur as a result of the Updates and associated development regulations, there are omissions from the development regulations that are necessary to address other life safety issues, other than response time impacts.

9 Appropriate structural rules to ensure that a fire does not spread from one occupancy to another need to be established and maintained. This would mean that necessary access requirements, fire flow requirements, and building distance separations are required and subsequently maintained, and enforced as necessary. Access requirements of the international fire code need to be maintained. Fire flow requirements of the international fire code need to be strictly implemented without variation. Lot line separations need to be employed to ensure that fire spread is contained based upon distance from building to building. A 5-foot separation from each lot line will require fire resistive construction with offset openings with exit windows from the front or rear enforced with 35-foot height restrictions. If the distance to the lot line decreases below 5 feet, residential sprinkler systems as well as the previous fire resistive construction features need to be implemented. In addition, height requirements must be limited to three stories or 35 feet. If taller heights are allowed above 35 feet, the best practices for fire protection must be employed, including without limitation four-sided vehicle access within 20 feet of the buildings, and limiting building height to 65 feet in total height. All of these requirements need to be maintained whether private or public road access is developed. The District has heard of development being encouraged to be private and utilize private roads, as this removes much of the road width, turnarounds and access requirements needed to deploy fire resources.

The District looks forward to working with the County on a jointly developed GMA compliant Capital Facility Plan for inclusion in a supplemental DEIS, the Updates, and the County's Comprehensive Plan.

Sincerely,

CHMELIK SITKIN & DAVIS, P.S.



Jonathan K. Sitkin

JKS/kab

Encl.

Cc: Client

F:\FIRE DISTRICTS\CENTRAL PIERCE COUNTY FIRE AND RESCUE\URBAN SERVICES\DRAFT LETTERS AND PPT\SEPA DISCUSSION FOR COMMENT LETTER.05.17.19.JS(FINAL).DOC

Response to Central Pierce Fire & Rescue (Letter 12)

Comment 1

The Growth Management Act defines “fire protection and suppression” as “Public Services,” not as “Public Facilities” (RCW 36.70A.030). Independent regional fire districts provide fire protection and fire suppression services in Pierce County. Pierce County is not required to plan for Public Facilities it does not own or operate.¹² Hence, the Growth Management Act does not require the County to include a Capital Facilities Plan for Fire and Emergency Services as part of its Comprehensive Plan (RCW 36.70A.070).

Regardless, the following change (as highlighted) is made to DEIS Section 3.4.1 Mitigation Measures to further reduce any potential impacts resulting from the alternatives:

There will be incremental increases in demand for fire services, including the need for facilities, personnel, and equipment.

The Growth Management Act allows and encourages the County to adopt a Fire and Emergency Services Capital Facilities Plan (CFP) as part of the Comprehensive Plan (WAC 365-196-415(2)(a)(ii)). If the CFP is adopted by Council and concludes that either voluntary mitigation fees or impact fees are warranted for new development projects, the County will

¹² *Sky Valley v. Snohomish County*, CPSGMHB No. 95-3-0068c, Final Decision and Order, p. 50 (March 12, 1996)

work with Central Pierce Fire and Rescue on advancing associated code changes as practicable and as permitted by law.

Comment 2

The DEIS acknowledged potential impacts on emergency response times. Mitigation measures provided in the DEIS and the FEIS ensure no significant unavoidable adverse impacts on emergency response times occur.

Comment 3

The comments are noted. No response is provided, as the comments provide general background related to fire services.

Comment 4

The Non-Project DEIS presented a general analysis of probable impacts, including those affecting fire services. This high-level analysis was appropriate, as the Community Plan Updates DEIS was prepared as a non-project EIS under Phased Review per WAC 197-11-060(5) and WAC 197-11-776, which allows lead agencies the ability to cover general matters in broader environmental documents with subsequent narrower documents concentrating solely on the issues specific to the later analysis. Furthermore, WAC 197-11-443(2) specifies that “a nonproject proposal may be approved based on an EIS assessing its *broad* impacts” (emphasis added). Future projects that may arise with respect to the Community Plan Updates non-project proposal will be subject to appropriate review under the State Environmental Policy Act (SEPA); a more detailed project-level analysis on fire services would occur to the extent that it is warranted by a specific project proposal.

Comment 5

Comment noted. The DEIS considered potential impacts on fire services resulting from the alternatives. The mitigation measures provided in the DEIS ensure the alternatives do not result in significant unavoidable adverse impacts on fire services.

The Non-Project DEIS presented a general analysis of probable impacts, including those affecting fire services. This high-level analysis was appropriate, as the Community Plan Updates DEIS was prepared as a non-project EIS under Phased Review per WAC 197-11-060(5) and WAC 197-11-776, which allows lead agencies the ability to cover general matters in broader environmental documents with subsequent narrower documents concentrating solely on the issues specific to the later analysis. Furthermore, WAC 197-11-443(2) specifies that “a nonproject proposal may be approved based on an EIS assessing its *broad* impacts” (emphasis added). Future projects that may arise with respect to the Community Plan Updates non-project proposal will be subject to appropriate review under the State Environmental Policy Act (SEPA); a more detailed analysis on fire services would occur to the extent that it is warranted by a specific project proposal.

Comment 6

In response to this comment, the DEIS has been revised (as highlighted) under Comment 1.

Comment 7

The Non-Project DEIS presented a general analysis of probable impacts, including those affecting fire services. This high-level analysis was appropriate, as the Community Plan Updates DEIS was prepared as a non-project EIS under Phased Review per WAC 197-11-060(5) and WAC 197-11-776, which allows lead agencies the ability to cover general matters in broader environmental documents with subsequent narrower documents concentrating solely on the issues specific to the later analysis. Furthermore, WAC 197-11-443(2) specifies that “a nonproject proposal may be approved based on an EIS assessing its *broad* impacts” (emphasis added). Future projects that may arise with respect to the Community Plan Updates non-project proposal will be subject to appropriate review under the State Environmental Policy Act (SEPA); a more detailed analysis on fire services would occur to the extent that it is warranted by a specific project proposal.

Comment 8

The comments are noted. No response is provided, as the comments are not specific enough to respond to.

Comment 9

The following change (as highlighted) is made to DEIS Section 3.4.1 Mitigation Measures to further reduce any potential impacts resulting from the alternatives:

New development would be constructed in compliance with the County’s zoning, fire, and building codes, including the International Building Code. The Community Plan Updates does not propose any changes or reductions to any fire code or building code regulations. Buildings built to new building heights must meet access, separation, interior fire access and escape, and construction materials requirements. In order to address potential impacts to emergency access and fire spread in tall and dense buildings, Pierce County shall work with Central Pierce Fire & Rescue to identify potential amendments to the County’s Fire Code and related codes. Pierce County may adopt agreed upon regulation changes and may propose regulation changes to the State Building Code Council (as applicable). Such amendments may include more stringent requirements related to access, fire flow, roads, building separation, fire resistive construction, and sprinklering.

Appendix

Appendix A: Distribution List

Appendix B: References

Appendix A: Distribution List

The following received notification of the availability of the ~~DEIS~~ DEIS/FEIS by email or US Mail:

Tribes

Muckleshoot Indian Tribe - Fisheries
Muckleshoot Indian Tribe - Cultural
Muckleshoot Indian Tribe - Wildlife
Muckleshoot Indian Tribe -Preservation
Nisqually Indian Tribe - Fisheries
Nisqually Indian Tribe – Cultural
Puyallup Tribe of Indians – Preservation
Puyallup Tribe of Indians - Fisheries
Puyallup Tribe of Indians – Water Quality
Snoqualmie Tribe – Cultural
Snoqualmie Tribe - Fisheries
Snoqualmie Tribe – General

Federal Agencies

Joint Base Lewis/McChord
US EPA, Region 10
U.S. Fish and Wildlife Service

State Agencies

WA State Department of Ecology – Habitat
WA State Department of Ecology – SEPA Review
WA State Department of Fish & Wildlife -General
WA State Department of Fish & Wildlife – SEPA Review
WA State Department of Natural Resources – SEPA Center
WA State Department of Natural Resources - General
WA State Department of Transportation
WA State Dept. of Archaeology & Historic Preservation
WA State Parks & Recreation
WA State Department of Health
WA Department of Commerce, Review Team

Regional Agencies

Puget Sound Regional Council
Metro Parks Tacoma
Port of Tacoma

Pierce Transit
Tacoma-Pierce County Health Department
Puget Sound Clean Air Agency
Puget Sound Energy
Northwest Pipeline
Olympic Pipeline Co.

Local Jurisdictions and Agencies

Pierce County Departments

Pierce County Executive's Office
Pierce County Council's Office
Pierce County Parks & Recreation
Pierce County PPW
Pierce County PPW – SWM
Pierce County PPW – Sewer
Pierce County Department of Economic Development
Pierce County PPW – Transportation Planning
Pierce County Sheriff
Pierce County Fire Protection Bureau

Cities

City of Bonney Lake
City of Puyallup/Development Services Center
City of Puyallup Public Works
City of Puyallup Development Services
City of Tacoma
Tacoma Power

Fire Departments

Riverside Fire & Rescue
Graham Fire & Rescue
Tacoma Fire Department
Central Pierce Fire & Rescue

Schools

Bethel School District
Franklin Pierce School District
Puyallup School District

Water Purveyors

Firgrove Mutual Water Company
Fruitland Mutual Water Company
Lakewood Water District
Spanaway Water
Summit Water
Tacoma Water
Rainier View Water Company / Southwood Water
Parkland Light & Water

Land Use Advisory Commission Members **Pierce County Commission Members**

Planning Commission

South Hill Advisory Commission
Frederickson Advisory Commission
Parkland-Spanaway-Midland Advisory Commission
Mid-County Advisory Commission

Newspapers and Libraries

The News Tribune

~~Pierce County Library Processing and Administration~~

~~Summit Branch — Pierce County Library~~

~~South Hill Branch — Pierce County Library~~

~~Parkland Spanaway Branch — Pierce County Library~~

Stakeholders and Individuals

South Hill Historical Society
Summit Waller Community Association
Pierce Communities Coalition
Garfield Street Business Association
Frederickson Clover Creek Community Council
North Clover Creek-Collins Community Association
Midland Community Association
Master Builder Association
Tacoma-Pierce County Association of Realtors
Pacific Lutheran University
Puyallup Watershed Initiative
Dara Carvalho
Futurewise
Roxy Giddings
Tom Heinecke

Kirk Kirkland, Tahoma Audobon Society
Jonathan Sitkin, Chmelik Sitkin & Davis P.S.
Jon Higley

Additional notices were sent to the following agencies and groups as appropriate:

Community Plan update interested parties – VIA Email ~~and US Mail~~

Appendix B: References

1. Puget Sound Regional Council Memorandum: Approve Full Certification of the Comprehensive Plan for Pierce County
2. Berk Consulting, 2020 Pierce County Housing Market Study





Puget Sound Regional Council

1011 WESTERN AVENUE, SUITE 500 ||| SEATTLE, WA 98104-1035 ||| psrc.org ||| 206-464-7090

Pierce County 2015 Comprehensive Plan Update

- 1) Memo dated July 20, 2017 (see page 2). As of this Executive Board action taken at the July 27, 2017 meeting, the Pierce County comprehensive plan is now fully certified for consistency with the transportation-related provisions of the Growth Management Act, VISION 2040, and Transportation 2040.

- 2) Certification report dated April 28, 2016 (see page 10). This report summarizes complete review of the 2015 comprehensive plan update and a certification condition for the city to address by December 31, 2017.



Puget Sound Regional Council

CONSENT AGENDA

July 20, 2017

To: Executive Board

From: Councilmember Rob Johnson, Chair, Transportation Policy Board
Councilmember Ryan Mello, Chair, Growth Management Policy Board

Subject: **Approve Full Certification of the Comprehensive Plan for Pierce County**

IN BRIEF

The Growth Management Policy Board and Transportation Policy Board recommend that the Executive Board certify the 2015 comprehensive plan for Pierce County, as clarified by the county's report dated June 26, 2017.

RECOMMENDED ACTION

The Executive Board should certify that the transportation-related provisions of the Pierce County comprehensive plan update, as clarified by the county's report dated June 26, 2017, conform to the Growth Management Act and are consistent with the multicounty planning policies and the regional transportation plan.

DISCUSSION

Pierce County adopted its updated comprehensive plan on September 1, 2015, consistent with the Growth Management Act and VISION 2040. The plan was conditionally certified by PSRC contingent on additional work to address strategies related to growth in the unincorporated urban area and annexation or incorporation.

The [certification report](#) included three specific requirements for further action to address consistency between the planning of the unincorporated urban area and VISION 2040 and the Regional Growth Strategy:

- Report on progress made employing strategies identified in Pierce County Ordinance No. 2011-36s to address management of growth in the unincorporated urban area.
- Continue to work to affiliate areas of the unincorporated urban area with adjacent cities and support annexation or incorporation.
- Pass a resolution stating the county's intent and deadlines to work with surrounding cities regarding annexation and incorporation.

The county adopted a [resolution and work plan](#) in June 2016. The attached report from Pierce County describes the county's implementation of several planning strategies that make progress on planning for the unincorporated urban area consistent with VISION 2040 and the county's work supporting annexation.

Central to the conditional certification is planning for the large unincorporated urban area in central Pierce County. The board recognized at the time that neither VISION 2040 anticipates nor would it be practical for the area to be fully affiliated with adjacent cities or be incorporated within the conditional review period. Annexation and incorporation are efforts that can take years to complete, require joint planning with cities, and often require a public vote for action. Therefore, the certification report sought confirmation of the county's continued progress of both appropriately planning for the unincorporated area and progressively working towards annexation or incorporation.

Growth Management Strategies

At the time of certification, the amount and rate of growth of the urban unincorporated area raised concerns regarding consistency with VISION 2040, which sees a larger portion of the unincorporated urban growth occurring within areas affiliated with cities. The county initially identified and evaluated a range of growth management strategies and subsequently initiated multiple planning efforts, including:

- Community plan updates (currently in process) that provide a combined land use and transportation strategy that redirects growth to a limited number of mixed use centers that increase walkability and transit access.
- Decreasing the urban growth area in locations that are not encumbered with existing urban density, infrastructure improvements, or vested projects.
- Review of the county's vesting policy and consideration of termination of the application extension program.
- Review of the county's sewer exception program.

Each of these initiatives has the potential to continue planning efforts in a manner consistent with VISION 2040 by supporting development where urban infrastructure is already in place and reducing the incentive to develop other portions of the urban UGA.

Annexation

Following the initial plan certification, the county has advanced efforts to support annexations and worked cooperatively with several cities on specific annexation opportunities. These efforts include:

- Development of Potential Annexation Areas [profiles](#) that identifies specific areas and their attributes to focus on future annexation opportunities.
- Prepared updates for consideration in the 2017 Comprehensive Plan amendment cycle that clarify policy related to areas of potential incorporation, identify Potential Incorporation Areas, and identify Potential Annexation Areas (Bonney Lake).
- Community plan updates (as noted above) that further individual community discussions, including about potential annexation or incorporation.
- Enhanced outreach and partnership with Pierce County cities, including:
 - Bonney Lake Annexation Agreement
 - Fircrest Annexation Agreement
 - Discussions with Gig Harbor, Fife, Bonney Lake, and Puyallup

- Efforts to encourage the state Legislature to address annexation in the 2017 legislative process, including a request to re-enact the state sales tax rebate that was used successfully for multiple annexations in King County.

Pierce County presented at PSRC's Peer Networking event on May 18 a [presentation](#) about developing annexation agreements with cities, which highlights some of their recent work.

As part of the conditional approval, Pierce County was to report to the Growth Management Policy Board regarding the county's progress working towards consistency with VISION 2040 and its planning for the urban unincorporated area. Staff review of the attached report by the county finds it addresses the requirements set out by PSRC to enable the plan to be fully certified. At the July 27 meeting, the Executive Board will be asked to take action on a recommendation to certify the plan.

For more information, please contact Paul Inghram at (206) 464-7549 or pinghram@psrc.org.

Attachments:

Pierce County Comprehensive Plan - Report on Conditions



Report to the PSRC on the Pierce County Comprehensive Plan Certification Requirements June 2017

Overview

On April 28, 2016, the PSRC Executive Board issued a “Conditional” Certification of the Pierce County Comprehensive Plan. The PSRC issued a “Conditional” Certification to bring the County’s planning into greater alignment with VISION 2040 and the Regional Growth Strategy. The specific issues related to:

- *The amount of growth planned within unincorporated urban Pierce County (i.e. adopted growth targets); and,*
- *Planning for the transformation of local government from the County to a city through annexation or incorporation.*

The April 2016 PSRC Plan Review Report identified three (3) steps the County must accomplish to receive “Full” Certification. Pierce County has completed these steps and has satisfied the requirements to receive a “Full” Certification. This report summarizes the actions taken by Pierce County to meet these requirements.

Conditional Certification Requirements

- 1) **Actions and measures to bring growth in unincorporated urban Pierce County into greater alignment with VISION 2040 and the Regional Growth Strategy. It is anticipated that this will include reporting on progress made employing strategies identified in Ordinance No. 2011-36s.**

***Pierce County Response/Actions:** In 2009, the PSRC Executive Board recognized that in some regional geographies, growth trends prior to 2008 had been at significant odds with VISION 2040’s Regional Growth Strategy (RGS). As it was unlikely 2040 goals could be met, the Executive Board asked jurisdictions (through VISION 2040’s Appendix II-B) to try their best to set targets as close to the RGS as reasonably possible. Jurisdictions facing this circumstance are asked to explain what steps they are taking to align with the RGS. Certification is to be based on those steps rather than an assessment of the targets alone.*

The Pierce County Comprehensive Plan assumes growth in the unincorporated urban area that is consistent with the County’s adopted 2030 growth targets; however, it represents a larger share of the county’s growth than called for in VISION 2040’s RGS. In pursuit of greater consistency with the RGS, the County has made significant progress in achieving the following strategies as identified in Pierce County Ordinance No. 2011-36s:

- Establishing a land use and transportation strategy that redirects growth to a limited number of mixed use centers in each of the community plan areas.

Pierce County started the update process of four (4) community plans in early 2016. These community plan areas represent the core of the unincorporated urban county. A significant change being considered through this process is the implementation of a Centers/Corridors strategy. Through this strategy, future growth would be encouraged along one of four (4) major transportation corridors. An objective of this redirection of growth is to establish land use patterns and densities that make public transit and other forms of active transportation more viable. The county completed its initial public outreach effort for these updates in June 2017. Staff is in the process of reviewing and developing alternatives and minor modifications to respond to received comments. While there may be modifications, the Centers/Corridors strategy remains a concept reflected in the plan updates. It is anticipated that the Planning Commission will forward its recommendation to the county Council in late December 2017.

- Decreasing the urban growth area in locations that are not encumbered with existing urban density, infrastructure improvements, or vested projects.

Pierce County has embarked on an analysis of the designated Urban Growth Area (UGA). The initial analysis shall be completed by fall 2017. Outreach to potentially affected landowners and other stakeholders will start in October 2017. Potential adjustments to the UGA shall be incorporated into the County's 2018/2019 Comprehensive Plan amendment cycle. It is anticipated that applications submitted through this amendment cycle would be considered for approval by county Council in June 2019.

- Modifying the County's policy on time extensions for vested projects.

Pierce County adopted Ordinance 2016-14s on April 26, 2016. This Ordinance deleted provisions (18.160.65 and .085) addressing Extension of Approval and Reactivation of Expired Approvals.

- Eliminating policies and code provisions that allow for "exceptions" such as building without sewer or limiting bonus densities.

Pierce County adopted Ordinance 2016-14s on April 26, 2016. Provisions adopted through this ordinance put additional parameters on development as related to meeting minimum density requirements for property that is more than 300 feet from a sewer hook-up. If a lot is more than 300 feet from a sewer hook-up, the minimum density requirement shall not apply, provided that only one lot of the proposed residential plat exceeds 7,260 square feet and associated improvements don't preclude future access or other improvements needed to achieve minimum density for any future land division.

- 2) Continued work to affiliate areas of the unincorporated urban area and support annexation or incorporation. PSRC is committed to supporting affiliation efforts and it is recognized that progress in this area will rely on affected cities and unincorporated communities.

Pierce County Response/Actions: VISION 2040 contains a goal to have all unincorporated urban areas either annexed into an existing city or incorporated as a new city. The supporting policies direct the County to affiliate all of its unincorporated areas with a city or identify areas that may be feasible for incorporation. A policy further supports joint planning between the appropriate cities and the County to plan for an orderly transition.

Through its 2015 Comprehensive Plan update, the County incorporated policy that supports annexation and the identification of areas that may be appropriate for incorporation. The County adopted Resolution No. R2016-79s to express its commitment in addressing annexation and incorporation. As committed to in R2016-79s, the following items have further advanced the discussion of annexation and incorporation:

- Profiles of Potential Annexation Areas (PAAs).

Pierce County collected information for each of the PAAs related to demographics, housing, land use, local special district, and zoning. The purpose of the published document is to assist in understanding the unique characteristics of each of the PAAs. A better understanding of an area may lead to a more productive discussion about future annexation opportunities.

- Adoption of additional Comprehensive Plan policies addressing Potential Incorporation Areas (PIAs).

Through its 2017 Comprehensive Plan amendment cycle, the county adopted additional policies that clarify PIAs can be established for an area based upon logical geographic boundaries, size, population, potential tax base, and a variety of uses for a city.

- Designation of its first Potential Incorporation Area (PIA).

Through its 2017 Comprehensive Plan amendment cycle, the county designated the Employment Based Planned Community of Tehaleh as a PIA. This designation was supported by the developer and existing community residents.

- Affiliation of two additional Potential Annexation Areas (PAAs) in unincorporated urban Pierce County with a city.

Through its 2017 Comprehensive Plan amendment cycle, the county designated two additional Potential Annexation Areas (PAAs) affiliated with the City of Bonney Lake. These two PAAs encompass 725 parcels totaling roughly 280 acres. Joint planning shall be passed over as the county and city agree to cooperate in the annexation of these areas via an Annexation Agreement.

- The inclusion of an “Annexation” and “Incorporation” discussion through the update of four (4) community plans.

Pierce County started the update process of four (4) community plans in early 2016. Early in the process, county staff began discussions about annexation and incorporation with the associated four Land Use Advisory Commissions. It is anticipated that some extent of these conversations will be incorporated into the community plans, with possible support to identify additional area(s) as a Potential Incorporation Area (PIA).

- Legislative efforts at the State level. The County worked with legislators and succeeded in having SB 5215 and HB 1681 proposed in the 2017 legislative session to address urban annexation issues. The bills:
 - *Extend the deadline to January 1, 2022 for certain cities to commence the annexation of certain unincorporated territories in order to be able to assess a sales and use annexation tax;*
 - *Expand, for certain counties and annexed areas, the population requirements for a city to be able to assess a sales and use annexation tax of 0.1 percent;*
 - *Eliminate a timing requirement for certain unincorporated territories to be eligible for annexation as an unincorporated island of territory; and,*
 - *Modify the notice and publication requirement for annexations being undertaken by an interlocal agreement between a city and county to include the option of publishing a summary of the agreement in a newspaper of general circulation within the area to be annexed for two (2) weeks prior to the hearing, along with concurrently posting the full agreement on the legislative body's official website.*

The Senate held a hearing on SB 5215 during 2017 regular session, but it was not forwarded out of committee despite interest and support by Kitsap County, Snohomish County, and a number of cities. Legislators cited the cost to the state from the proposed sales and use tax credit as the reason it did not move forward.

Pierce County worked with Kitsap County later in the session to amend SB 5652 and incorporate items from SB 5215 other than the sales and use tax credit section. However, while SB 5652 did move to the House Rules Committee, it did not move to the floor for consideration due to opposition by the Association of Washington Cities.

Pierce County’s current intent is to include SB 5215 and HB 1681 (or their content if a different bill becomes the vehicle) on the county’s 2018 legislative agenda.

- Outreach/partnerships with cities to promote/facilitate annexation.

Pierce County has actively promoted both annexation and the establishment of joint planning agreements. Further progress has been made with annexation in comparison to joint planning. The focus of annexation is on unincorporated “islands” utilizing an interlocal agreement as permitted through RCW 35A.14.460.
- *The county entered into its first annexation agreement on April 17, 2017 with the City of Bonney Lake.*
- *The county is in the final stages of completing an annexation agreement with City of Fircrest.*

- *County staff has made various presentations before the Gig Harbor City Council discussing joint planning, annexation, and potential reduction of its designated Urban Growth Area. It is anticipated work will begin on an annexation agreement with Gig Harbor before the end of the year.*
- *The county has had productive discussions about annexation with staff from the cities of Fife and Puyallup. As mentioned above, the county will enter into two additional annexation agreements with Bonney Lake as a result of the designation of areas as Potential Annexation Areas (PAAs) through the County's 2017 Comprehensive Plan Amendment cycle.*
- *The county has had on-again/off-again joint planning discussions with the cities of Puyallup and Gig Harbor. These joint planning discussions served as a catalyst to the annexation discussions. Joint planning efforts have currently been set aside to advance annexation opportunities.*

3) The Pierce County Council will, no later than June 2016, pass a resolution stating their intent and deadlines to work with surrounding cities regarding annexation and incorporation.

Pierce County Response/Actions: The Pierce County Council adopted Resolution R2016-79s on June 28, 2016. Exhibit A of this Resolution provides a work program and schedule as required by PSRC to receive "full" certification. The work program includes those items listed under 2) above.

Background

The Pierce County Council adopted an update to its Comprehensive Plan on September 1, 2015. This adopted document incorporated changes as suggested through an initial June 5, 2015 PSRC comment letter. Pierce County submitted its adopted plan with a completed Plan Review Checklist to PSRC on October 12, 2015 for certification purposes. PSRC staff had recommended the Pierce County Comprehensive Plan receive "full" certification. The PSRC Growth Management Policy Board discussed the County's certification at its March and April meetings. In response to comments from some Board members, the Pierce County Plan was recommended to the Executive Board with a "Conditional" Certification. The PSRC Executive Board approved a "Conditional" Certification for the Pierce County Comprehensive Plan on April 28, 2016.

As the PSRC staff was drafting its initial recommendation, the Pierce County Council adopted Resolution R2016-31 on March 15, 2016. This Resolution reiterated the County's policy to "encourage affiliation of unincorporated urban lands with adjacent cities and towns and encourage annexation of these affiliated lands, and to identify future incorporation areas within the unincorporated urban area." This Resolution also asked for technical assistance from PSRC to encourage affiliation and promote annexation.

On June 28, 2016, after the PSRC Executive Board approved a "Conditional" Certification, the Pierce County Council adopted R2016-79s. This Resolution states it is Pierce County's intent to encourage affiliation of unincorporated urban areas to existing cities, and support annexation and incorporation where appropriate and consistent with the Pierce County Countywide Planning Policies and the policies of the Pierce County Comprehensive Plan. Exhibit A of this Resolution provided a work program and schedule as required by PSRC to receive "full" certification.

PSRC PLAN REVIEW REPORT & CERTIFICATION RECOMMENDATION

PIERCE COUNTY COMPREHENSIVE PLAN

April 28, 2016

BACKGROUND

The Washington State Growth Management Act calls for coordination between local, regional, and state planning efforts. To advance this coordination, state law requires PSRC to certify that regional transit plans, countywide planning policies, and local comprehensive plans within the central Puget Sound region conform to: (1) established regional guidelines and principles, (2) the adopted long-range regional transportation plan, and (3) transportation planning requirements in the Growth Management Act. Within the central Puget Sound region, the multicounty planning policies in VISION 2040 have been established as the regional guidelines and principles under Revised Code of Washington (RCW) 47.80.026. Certification of local comprehensive plans is also a requirement for jurisdictions and agencies that intend to apply for PSRC funding or proceed with any project submitted into the Regional Transportation Improvement Program, regardless of funding source.

Within the central Puget Sound region, local governments and PSRC have worked together to develop an overall process ([Adopted Policy and Plan Review Process](#), Revised September 2003) for reviewing and certifying local, countywide, regional, and transit agency policies and plans.¹ This process also provides an opportunity to coordinate and share information related to local and regional planning. A set of materials, compiled in a [Plan Review Manual](#), provides details on the review and certification process, background, and framework. The manual also provides guidance and checklists for aligning plans and policies with [VISION 2040](#), [Transportation 2040](#), and [Growth Management Act](#) requirements.

DISCUSSION

This report summarizes the findings and recommendations regarding the periodic update to the Pierce County comprehensive plan, adopted on September 1, 2015. PSRC last certified Pierce County's 1999 comprehensive plan in February 2001. PSRC staff reviewed the updated 2015 comprehensive plan and coordinated with county staff in the development of this report.

CERTIFICATION RECOMMENDATION

Based on the review of the Pierce County comprehensive plan and supplemented information provided by the county, including Pierce County Council Resolution R2016-31, the following action is recommended to the PSRC Executive Board:

The Puget Sound Regional Council conditionally certifies that the transportation-related provisions in the Pierce County 2015 comprehensive plan update conforms to the Growth Management Act and are consistent with the multicounty planning policies and the regional transportation plan.

¹ The certification requirement in the Growth Management Act is described in RCW 47.80. The specific requirements for transportation elements in local comprehensive plans are spelled out in RCW 36.70A.070. PSRC's Interlocal Agreement, Section VII, also provides direction for the review of local comprehensive plans and countywide policies (Resolution A-91-01, amended March 1998). The Council's Executive Board last updated its process for Policy and Plan Review in September 2003. The process is also described in VISION 2040, Part IV: Implementation.

Conditional status is in place until Pierce County further addresses consistency between the planning of the unincorporated urban area and VISION 2040 and the Regional Growth Strategy. This will include:

- **Actions and measures to bring growth in unincorporated urban Pierce County into greater alignment with VISION 2040 and the Regional Growth Strategy. It is anticipated that this will include reporting on progress made employing strategies identified in Ordinance No. 2011-36s.**
- **Continued work to affiliate areas of the unincorporated urban area and support annexation or incorporation. PSRC is committed to supporting affiliation efforts and it is recognized that progress in this area will rely on affected cities and unincorporated communities.**
- **The Pierce County Council will, no later than June 2016, pass a resolution stating their intent and deadlines to work with surrounding cities regarding annexation and incorporation.**

Pierce County will work with PSRC, affected cities and the Pierce County Regional Council to address these issues and report back to the GMPB by December 2017 on progress to date.

Pierce County and PSRC staff have agreed to continue to work together to advance appropriate planning strategies to manage growth of the unincorporated urban area and to work toward annexation and incorporation. Resolution R2016-31 adopted by the county on March 15 “acknowledges its commitment to efforts to further align growth within the unincorporated area with Vision 2040 in the future consistent with the spirit and intent of Ordinance No. 2011-36s and the Pierce County Countywide Planning Policies” and commits the county to report back to the Growth Management Policy Board no later than December 31, 2017.

The remainder of this report contains a summary of the PSRC review of the Pierce County comprehensive plan update. Under each heading, the scope of the certification review, as guided by the [Plan Review Manual](#) and [checklist for local comprehensive plans](#), is listed in high level bullets. Discussion in each topic area highlights exemplary provisions of the plan, as well as issues identified through the certification review where future work is needed to more fully address VISION 2040, Transportation 2040, and GMA planning requirements. PSRC recognizes that the timing and mechanism for addressing each of the comments will vary based on the jurisdiction, its resources and plan update process, and the nature of the comment.

Part I: Conformity with Growth Management Act Transportation Planning Requirements

SCOPE OF REVIEW

The Growth Management Act (RCW 36.70A.070(6)) includes several requirements related to transportation elements in local comprehensive plans. These requirements are summarized as follows:

Land use assumptions and forecasts of travel demand that are internally consistent and consistent with growth targets.

Service and facility needs, including inventories of existing facilities, and level-of-service standards and concurrency provisions that address multiple modes of travel, planned land uses and densities, and state highways.

Financing and investments, including a multiyear financing plan and reassessment strategy to address potential funding shortfalls.

Intergovernmental coordination with neighboring cities, counties, and regional and state agencies.

Demand management, including programs to implement the Commute Trip Reduction Act.

Pedestrian and bicycle planning, including project funding and capital investments, education, and safety.

Land uses adjacent to airports, identifying relevant facilities, existing and planned uses, and policies that discourage incompatible uses.

Air quality is largely an interjurisdictional issue in which each jurisdiction's travel behaviors, measured through vehicle emissions, affect the regional airshed. The Washington Administrative Code (WAC) requires local transportation elements and plans to include "policies and provisions that promote the reduction of criteria pollutants" for mobile sources (WAC 173-420-080). When PSRC reviews plans, it also certifies that the comprehensive plans include air quality policies and provisions, including a commitment to meeting the requirements of applicable federal and state air quality legislation.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The county comprehensive plan effectively addresses many of the transportation planning requirements of the Growth Management Act and includes adequate air quality policies and provisions. Highlights include:

- ☑ The county is commended for developing an extremely accessible and well-organized plan document that clearly references related plans and other documents and provides hyperlinks throughout the document for easy navigation and cross-referencing. Developing a comprehensive plan for a large and complex geography like unincorporated Pierce County while maintaining transparency, accessibility, and readability is a very difficult task and the county did an excellent job in this important area.
- ☑ The plan includes a number of impressive community plans that provide thoughtful guidance for the development of individual subareas, including subarea policies supporting center-oriented development and preservation of rural areas and open space.
- ☑ The plan includes notable policies that endorse the concept of complete streets for newly constructed or reconstructed roads, call for developing improved programs to encourage increased levels of active transportation, and encourage developers to include active transportation elements in all projects.
- ☑ The plan references a detailed and thorough inventory and analysis of the existing pedestrian transportation system, including sidewalks, curb ramps, traffic control signals, driveway entrances that include ramps, and barriers to the accessibility of these facilities as defined by the Americans with Disabilities Act.
- ☑ The transportation element includes a thorough discussion of the context and status of transportation demand management efforts in Pierce County.

DISCUSSION: AREAS FOR FURTHER WORK

The county should address the following comments at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans (see comments addressing consistency with regional guidelines and principles on transportation and Transportation 2040 on page 11):

- The Growth Management Act requires that the comprehensive plan be an internally consistent document (RCW 36.70A.070). One important measure of this is consistent planning periods and land use assumptions across various elements. In the Pierce County comprehensive plan, the transportation element makes it clear that the planning horizon and land use assumptions extend to 2030. However, for the other elements, including land use, housing, community plans, and others, no horizon year or planning period is defined. Instead, those elements reference, e.g., “the 20-year planning horizon” (page 2-43). The county should amend the plan to clarify the relevant planning period and land use assumptions across all elements, consistent with the land use and transportation elements and adopted targets. The county is encouraged to work with Pierce County cities to identify a strategy for future extension of the 2030 targets to 2035 or beyond consistent with the Regional Growth Strategy.
- The Growth Management Act requires intergovernmental coordination efforts, including an assessment of the impacts of the transportation plan and land use assumptions on the transportation systems of adjacent jurisdictions (RCW 36.70A.070). As the county plans for and implements its transportation system, it should ensure close coordination with cities, adjacent jurisdictions and the military. While the plan includes modeling of countywide travel behavior, the transportation element in the plan would benefit from clearer information that shows how the transportation system in the unincorporated part of the county is connected and integrated with the systems in other jurisdictions.
- The county should work to complete the pedestrian and bicycle component of the transportation element (RCW 36.70A.070(6)(a)(vii), WAC 365-196-430(2)(j)) and update key information in the Nonmotorized Transportation Plan to address existing conditions, new information, and collaborative efforts such as the PSRC Active Transportation Plan.

The plan includes notable policies that call for endorsing the concept of complete streets for newly constructed or reconstructed roads, developing improved programs to encourage increased levels of active transportation, and encouraging developers to include active transportation elements in all projects. However, some important components of a complete pedestrian and bicycle component appear to be missing or out-of-date, including an inventory of the existing bicycle network, a review of available pedestrian and bicycle collision data to identify priority areas for safety improvements, and a list of planned projects.

Part II: Consistency with Regional Plans and Policies

OVERVIEW

This section discusses consistency with the adopted multicounty planning policies (established regional guidelines and principles under RCW 47.80.026) adopted in VISION 2040, and Transportation 2040, the region’s long-range transportation plan. In addition to the multicounty planning policies, VISION 2040 contains a Regional Growth Strategy with a preferred distribution of the region’s residential and employment growth, as well as a number of implementation actions for local governments to carry out. Each policy area addressed in VISION 2040 is discussed in turn below.

VISION 2040 CONTEXT STATEMENT

VISION 2040 calls for local plans to include a context statement that describes how the comprehensive plan addresses regional policies and provisions adopted in VISION 2040. The plan includes descriptions of and references to VISION 2040 in several places within the plan. The county also provided a detailed reporting tool along with the plan’s submittal for certification review. The county is encouraged to continue to expand on the

references in the plan in future updates, including discussion of actions and measures the county is taking to bend development trends to align with the Regional Growth Strategy and discussion of how the plan's land use strategies are coordinated with other Pierce County jurisdictions. Examples of context statements are provided in PSRC's [Plan Review Manual](#), page 2-1.

Environment

SCOPE OF REVIEW

VISION 2040 calls for local comprehensive plans to address the following environmental policy topics:

Stewardship, including addressing the natural environment throughout the plan, decisions based on best-available science, and regional environmental initiatives.

Earth and habitat, including open space protection, restoration and protection of native vegetation, and coordination with adjacent jurisdictions.

Water quality, including actions that maintain hydrologic functions and reduce water pollution in ecosystems, watersheds, shorelines, and estuaries.

Air quality and climate change, addressing federal and state laws, reduction of pollutants, Puget Sound Clean Air Agency policies, and reduction of greenhouse gas emissions and adaptation to climate change.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The county's comprehensive plan addresses many of the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:

- The environment element includes goals and policies addressing protection of critical areas, including best available science, interjurisdictional coordination on fish and wildlife habitat issues, and protection and restoration of native vegetation (goals ENV-1,2,3,8,14, policies ENV-1.5,2.2).
- The plan includes an open space element that describes and addresses five major categories of open spaces which are organized by their primary value or function (habitat, working lands, outdoor recreation, community-defined values, and public health and safety). The open space element includes policies that apply to all types of open spaces, and provides helpful cross-references to other plan elements that address specific types of open spaces. Open space overlays and compatible land use designations provide clear standards for protection of these open space functions.
- The plan establishes a goal (U-38) of making the use of low impact development techniques in public and private developments and projects the preferred method of land development.

DISCUSSION: AREAS FOR FURTHER WORK

The county should address the following comment at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:

- VISION 2040 and Transportation 2040 call for the region to address its contribution to climate change and to plan for adaptation to unavoidable impacts related to climate change. The comprehensive plan includes a variety of policies and provisions that will help move the county and region towards a more balanced transportation system and minimize greenhouse gas emissions. However, the plan does not include goals or policies that specifically address the county's contribution to climate change, state initiatives and directives regarding climate change and the reduction of greenhouse gases (e.g., [RCW 70.235.020](#), [RCW 47.01.440](#)), or actions the county will pursue to mitigate climate change impacts. MPP En-23 calls for regional and local actions to reduce vehicle miles traveled and increase alternatives to driving alone. Notably, even though the plan states, "Pierce County will explore additional opportunities to reduce VMT through increased usage of transit and rideshare," tables 12-D, 12-J, and table 2-B in the plan show a forecasted increase in per capita vehicle miles traveled according to the travel

demand model. The plan explains that model statistics on per capita vehicle miles traveled on county roadways do not fully reflect county actions to reduce transportation emissions because of relationships with other jurisdictions and the state highway system.

The county should adopt goals and policies that support the region’s commitment to addressing climate change. The county should also work to develop and document specific provisions to reduce emissions, which may include measures to reduce vehicle miles traveled and shift to lower-emission vehicles, measures to make more efficient use of land and buildings, supporting renewable energy, and increasing the number of trees in the county. Helpful information on identifying emissions-reducing strategies can be found in the [Washington State Climate Change Resources](#), [Washington State Integrated Climate Change Response Strategy](#), and [PSRC Climate Change Information](#).

Development Patterns – including Regional Growth Strategy

SCOPE OF REVIEW

VISION 2040 calls for local comprehensive plans to address the following development patterns policy topics:

Urban areas, including targets for housing and employment growth, compact communities that support transit and walking, and provisions for redevelopment of underused land.

Centers, including planning for one or more central places as locations for compact, mixed-use development, with policies that prioritize funding to centers to advance development.

Unincorporated urban areas, including policies that advance annexation and orderly transition of governance.

Resource lands, including identification of steps to limit development.

Regional design, addressing local provisions that apply the Transportation 2040 Physical Design Guidelines, energy efficient building, historic preservation, and enhanced sense of community.

Health and active living, addressing healthy environment, physical activity and well-being, and safety.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The county’s comprehensive plan addresses many of the development patterns policies in VISION 2040. Highlights include:

- ☑ Policies calling for infrastructure funding to be prioritized to support designated centers and transit-oriented corridors, consistent with VISION 2040’s emphasis of focusing and supporting growth in centers.
- ☑ Policies and provisions that support farming and farmland preservation throughout the county through strategies such as tax incentives, restrictions on incompatible uses on adjacent lands, prioritization policies for land acquisition programs, utilization of public lands for lease-back farming programs, and policies calling for the county’s purchasing programs to seek out locally grown produce.
- ☑ A dedicated cultural resources element that aims to identify, protect, and enhance historic properties and cultural landscapes throughout unincorporated Pierce County.
- ☑ A dedicated design and character element that aims to build on community planning efforts throughout the county to enhance neighborhood quality, encourage attractive development, and reflect the “heart and soul of a community.”

DISCUSSION: CONDITIONS FOR CERTIFICATION

The county must address the following provision of the Growth Management Act and VISION 2040 in order to maintain certified status:

- ☐ The Growth Management Act calls for a transformation of local governance in the urban growth area, through annexation to or incorporation of a city, so that urban governmental services are primarily

provided by cities and rural and regional services are provided by counties (RCW 36.70A.210, WAC 365-196-305). VISION 2040 calls for all unincorporated lands within the Urban Growth Area to transition into cities and assumes this transition to be largely complete by 2040. Two important steps in this process are (1) affiliation of the urban growth area for annexation by neighboring cities or identification of areas not appropriate for annexation for incorporation (MPP-DP-18), and (2) joint planning to ensure an orderly transition to municipal governance (MPP-DP-19). VISION 2040's Regional Growth Strategy also calls for affiliated portions of the unincorporated urban growth area to accommodate a greater share of growth than nonaffiliated areas.

The county has adopted notable goals and policies that support affiliation of the unincorporated urban growth area with cities, encourage annexation of these areas through joint planning, and call for identifying areas not suitable for annexation for incorporation as new cities. These goals and policies provide a roadmap for facilitating this transformation of governance and go a long way towards implementing the Regional Growth Strategy and Growth Management Act. However, the comprehensive plan (Map 2-2) indicates that the majority of the unincorporated urban growth area is not affiliated for annexation or identified for incorporation. The comprehensive plan (Table 2-D) also allocates about three-fourths of the unincorporated urban growth area's housing and employment growth targets to unaffiliated portions. The county has indicated that it has already begun implementing the plan's goals and policies on affiliating, annexing, and incorporating the unincorporated urban growth area.

The county should continue its work to affiliate urban unincorporated lands with an adjacent city or identify those that may be feasible for incorporation. Once affiliated, the county should revise the plan and supporting documentation to reflect the affiliation, including revised allocations of growth within the urban unincorporated area to better reflect the Regional Growth Strategy by focusing growth in affiliated areas.

- Growth targets adopted by Pierce County in 2011 allocated 28.8% of assumed countywide population growth for the 2008-2030 planning period to the unincorporated urban growth area. This was significantly higher than the 20.6% called for by the Regional Growth Strategy. The adopting ordinance documented potential strategies to bend the trend of recent growth to align with the Regional Growth Strategy.²

The Pierce County 2015 comprehensive plan assumes growth consistent with this target and has adopted or made progress toward several of the strategies documented in the growth target's adopting ordinance, as well as others. The plan also includes numerous goals, policies, and actions to support efficient and low-impact development patterns consistent with VISION 2040.

However, it is unclear whether the ongoing and proposed strategies will sufficiently change the rate of growth for unincorporated urban areas and ultimately align with VISION 2040's Regional Growth Strategy in years after 2030. The plan should be amended, consistent with VISION 2040 and the guidance in Appendix II-B, to recognize and further the objective of aligning with the Regional Growth Strategy, especially for the period after 2030.

DISCUSSION: AREAS FOR FURTHER WORK

The county should address the following provisions of the Growth Management Act and VISION 2040 at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:

- VISION 2040 calls for coordinating planning efforts to facilitate a common vision, including focusing growth in designated regional centers (MPP-G-1, MPP-DP-5). The plan identifies and reflects adopted

² In 2009, the PSRC Executive Board recognized that not all local plans or targets would perfectly align with VISION 2040 and in a [technical amendment](#) to the Regional Growth Strategy ("Appendix II-B"), stated that PSRC's review and certification of plans will be based on the actions and measures already taken or proposed to be put in place to bend the trend, and not just on an assessment of the targets alone. Jurisdictions with growth targets higher or lower than what would be expected from a straight-line application of the Regional Growth Strategy should show the actions and measures that are being undertaken, or expected to be taken, to bend the trend of recent growth to align with the Regional Growth Strategy.

countywide growth targets and addresses local centers and the Frederickson manufacturing/industrial center. The county is also encouraged to add discussion and develop policies that address the overall countywide growth pattern, including support for the region’s designated centers as a focus of growth and development.

- VISION 2040 calls for avoiding new fully contained communities outside of the designated urban growth area because of their potential to create sprawl and undermine state and regional growth management goals (MPP-DP-23). Goal LU-75 in the land use element is supportive of this regional policy, but the Key Peninsula Community Plan discusses the possibility of establishing a reserve area for a fully contained community and includes an implementation action to explore its viability. The county should work with the Key Peninsula Land Use Advisory Commission to revise the community plan to be consistent with regional and county policy on avoiding new fully contained communities in the rural area.
- VISION 2040 calls for using existing and new tools and strategies to address vested development to ensure that future growth meets existing standards and prevents further fragmentation of rural lands (MPP-DP-25). The county is encouraged to explore and implement strategies beyond goal LU-109 (“Maintain consistency with state vesting laws”) to address the impact on the region’s rural area of development applications that are vested under outdated standards.
- VISION 2040 calls for designating and permanently conserving natural resource lands within the region, not converting these lands to other uses or adversely impacting them through adjacent development, and supporting local food production and agricultural uses (Resource Lands goal, MPP-DP-28 through 32, MPP-DP-47). The county is encouraged to review its policies, resource land designation criteria, and application of designation criteria in the future land use map to ensure that the plan effectively supports these regional goals and policies. The county should review several policies, including LU-86, that potentially allow redesignation of agricultural lands of long-term commercial significance to other uses, including low-density residential development or urban growth area expansions.
- The Frederickson manufacturing/industrial center plays an important role in accommodating future growth in the region. VISION 2040 includes an action for jurisdictions with regional centers to develop subarea plans (DP-Action-17), and PSRC will be certifying center plans for consistency with regional policies and procedures. Subarea planning will help the county both achieve its vision for the area as well as address regional center expectations in the [center plan checklist](#). The county has developed a community plan for the broader Frederickson area and adopted policies calling for developing a market study and establishing center-specific employment targets and mode split goals. The county should also ensure that it addresses these and other centers planning expectations for the Frederickson manufacturing/industrial center.

Housing

SCOPE OF REVIEW

VISION 2040 calls for local comprehensive plans to address the following housing policy topics:

Increased housing production opportunities, including diverse types and styles for all income levels and demographic groups.

Affordable housing needs, including an assessment of existing and future housing needs based on regional and local factors, including household income, demographics, special needs populations, and adequacy of existing housing stocks.

Regional housing objectives in VISION 2040, including promotion of housing diversity and affordability, jobs-housing balance, housing in centers, and flexible standards and innovative techniques.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The county's comprehensive plan addresses the housing provisions contained in VISION 2040. The plan incorporates a number of best housing practices that address identified housing needs. Highlights include:

- ☑ Strong overarching goals and policies that support a range of housing choices and affordability levels and address a variety of special housing needs.
- ☑ The county's commitment to use innovative approaches to balance density and neighborhood character, preserve market affordability, mitigate displacement due to redevelopment, and produce new affordable units through inclusionary and incentive zoning.
- ☑ Goal H-12 and associated policies call for the county to reuse the existing housing stock where possible to help meet housing demand.
- ☑ Goal H-15 calls for the county to monitor the success of the housing policies, including developing benchmarks to measure the development of affordable housing and an assessment conducted at least every five years.

DISCUSSION: AREAS FOR FURTHER WORK

The county should address the following comments at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:

- ☐ The county is commended for addressing a variety of tools to increase affordability in the Pierce County housing element goals and policies. However, many of these policies appear to rely on future work. In order to strengthen the plan, the county should add more information on strategies and timing for implementation of the policies in the housing element.

Economy

SCOPE OF REVIEW

VISION 2040 calls for local comprehensive plans to address the following economic development policy topics:

Include an **economic development element** that addresses: business, people, and places.

Retention and recruitment efforts that support family wage jobs, industry clusters that export goods and services, and small businesses that are locally owned.

Equitable benefits and impacts, including provisions and programs that promote economic vitality in distressed areas or areas with disadvantaged populations.

Adequate housing growth in centers through collaboration with the private sector and provision of infrastructure.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The county's comprehensive plan update contains a thorough and detailed economic development element that effectively addresses many of the economic provisions of VISION 2040. Highlights include:

- ☑ An economic development element that provides a helpful analysis of important industry clusters in Pierce County, anchored by healthcare and medical services, commerce related to the Port of Tacoma, and the military operations at Joint Base Lewis-McChord.
- ☑ A useful analysis of average wages in various Pierce County employment sectors to help focus economic development efforts to support widely shared prosperity and a diversity of family wage jobs.
- ☑ Policies that support investment in the county's workforce through education, training, and technical assistance to businesses.

DISCUSSION: AREAS FOR FURTHER WORK

- VISION 2040 calls for the region to protect industrial lands, particularly designated manufacturing/ industrial centers, from encroachment by incompatible uses and development on adjacent land (MPP-DP-53, MPP-Ec-19). While the land use element includes a goal and associated policies that call for ensuring no overall loss of industrial lands, the Fredrickson community plan calls for allowing a range of uses within the Fredrickson manufacturing/industrial center, including office, service, and regional retail uses including “big box” retail buildings up to 170,000 sq. ft. in the Central Place. This intensity of regional retail development has the potential to adversely affect the industrial character of the Fredrickson manufacturing/industrial center through traffic impacts on freight movement, increased land values, eventual pressure to convert additional industrial land to retail, service, and other commercial uses that will seek to capitalize on retail traffic destined for the Central Place. The county should reevaluate the potential that the plan will result in erosion of industrial character in this regionally designated center and consider revisions to the plan to maintain consistency with regional policies on protecting industrial land and designated manufacturing/industrial centers from incompatible uses.
- VISION 2040 calls for economic development efforts within the region to include programs and provisions for distressed areas and areas with disadvantaged populations (MPP-Ec-11,12,13). The county should work to develop and highlight supportive policies, programs, and strategies within the economic development element.

Transportation

SCOPE OF REVIEW

VISION 2040 and Transportation 2040 call for local comprehensive plans to address the following transportation policy topics:

Maintenance, management, and safety, including clean transportation with reductions in pollution and greenhouse gas emissions, environmental factors, health and safety, stable and predictable funding sources, system and demand management strategies, and security and emergency response.

Support for the Regional Growth Strategy, including system improvements that align with planned growth, prioritized investments that support compact development in centers, joint- and mixed-use development, complete streets and improvements to promote biking and walking, and context-sensitive design.

Improved transportation options and mobility, including alternatives to driving alone, facilities and services for special needs transportation, avoidance of new or expanded facilities in rural areas, and financing methods.

Linking land use and transportation, including integrating Transportation 2040 physical design guidelines in planning for centers and transit station areas, and land development tools that promote transportation alternatives.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The county’s comprehensive plan addresses the major transportation emphases in VISION 2040 and Transportation 2040, including maintenance, management, and safety; support for the Regional Growth Strategy; and providing greater options and mobility. Highlights include:

- ☑ The plan’s transportation element discusses the importance of prioritizing maintenance and preservation, includes a goal that identifies maintenance, operations, and preservation as the county’s highest priority for investments, and implements the goal with significant funding in the transportation element’s financing plan dedicated to maintenance and preservation.
- ☑ The transportation element identifies roadway safety as a high priority, including endorsement of a complete streets concept, which promotes roadways that are safe for all users.

DISCUSSION: AREAS FOR FURTHER WORK

The county should address the following comments at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans (see comments addressing Growth Management Act transportation planning requirements on page 4 of this report):

- VISION 2040 calls for the region to emphasize transportation investments that provide and encourage alternatives to single-occupant vehicle travel and increase travel options and increase the proportion of trips made by transportation modes that are alternatives to driving alone (MPP-T-23,24). While the comprehensive plan reflects the regional plan with high-level goals and policies, including calls for additional future work to support a multimodal transportation system, the transportation plan as a whole supports a capital investment strategy that appears heavily focused on the construction of new and expanded roadways, arterial intersections, and highways.

For example, the pedestrian facility inventory developed as part of the county's Americans with Disabilities Act transition plan reveals significant gaps in pedestrian infrastructure throughout the county and the comprehensive plan identifies significant needs for improvements to the bicycle network. However, less than 5% of the expenditures identified in the improvement portion of the plan's financial strategy are targeted to standalone pedestrian and bicycle projects despite the county's Nonmotorized Transportation Plan's goal of 15% of the county's construction fund being dedicated to improved pedestrian and bicycle facilities. The plan notes that, "most people agree that nonmotorized facilities are important to have in their community. There are many nominated projects but the costs are high and the prospects for funding are less than stellar. It is suggested that a programmatic approach be tested that would identify partners and use seed money to draw down more grant dollars." The plan also does not identify dedicated projects, programs, or funds to support more reliable and efficient transit service.

In order to more effectively and completely address the need to plan for and implement a multimodal transportation system, the county should build on the notable goals and policies in the plan with clear implementation measures and additional identified transportation funds for projects that benefit transit, pedestrian, and bicycle modes. The plan also should identify transportation and land use strategies to support transit, including identifying dedicated projects, programs, or funds to support more reliable and efficient transit service, and orienting land use patterns toward transit service. Doing so will support the region's goal of offering greater options, mobility, and access in support of the Regional Growth Strategy. See PSRC's [Transit Supportive Planning Toolkit](#) and [Active Transportation Plan](#) for more information and examples.

- VISION 2040 calls for level-of-service standards to be focused on the movement of people and goods instead of only the movement of vehicles (MPP-DP-54), and for concurrency programs to address multimodal transportation options – both in assessment and mitigation (MPP-DP-55). The county has made progress towards addressing these policies and should continue to work towards supporting multiple modes of travel in its level-of-service analysis and concurrency program, and consider additional provisions, such as nonmotorized improvements, transit service, high occupancy vehicle priority treatments, and intelligent transportation systems. These efforts would support implementation of the transportation element's goal of reducing the need and expense of new transportation investments (T-33).

Public Services

SCOPE OF REVIEW

VISION 2040 calls for local comprehensive plans to address the following public services policy topics:

Promote more efficient use of existing services, such as waste management, energy, and water supply, through conservation – including demand management programs and strategies.

Promote renewable energy and alternative energy sources.

Plan for long-term water needs, including conservation, reclamation and reuse.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The county’s comprehensive plan update contains policies that address the public services provisions of VISION 2040. Highlights include:

- The plan’s utility element includes goals and policies that support efforts to reduce solid waste and encourage water and energy conservation.

DISCUSSION: AREAS FOR FURTHER WORK

The county should address the following comments at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:

- VISION 2040 calls for new development within the urban growth area to be served with sanitary sewer systems or fit with dry sewers in anticipation of connection to the sewer system (MPP-PS-9). The plan includes goals and associated policies that partially address this policy, including goals LU-25, 27-29, but they should be strengthened to more fully address regional policy in this area as well as Goal LU-27 in the land use element (“urban level facilities and services must be provided prior to or concurrent with development”).
- VISION 2040 calls for locating schools, institutions, and other community facilities that primarily serve urban populations within the urban growth area (MPP-PS-21). The county should review provisions in the plan, including Goal LU-78 and policy LU-78.1, to ensure consistency with MPP-PS-21.

Conclusion

PSRC staff thanks the county for working through the plan review process. We look forward to continuing to work with the county to advance planning strategies to manage growth of the unincorporated urban area and work toward annexation and incorporation of the urban growth area as addressed through Pierce County Council resolution R2016-31, which “acknowledges its commitment to efforts to further align growth within the unincorporated area with Vision 2040 in the future consistent with the spirit and intent of Ordinance No. 2011-36s and the Pierce County Countywide Planning Policies.”

The county will report back to the Growth Management Policy Board in late 2017 on progress towards “bending the trend” toward consistency with the Regional Growth Strategy and encouraging affiliation and annexation of the urban growth area. This report should also address any additional measures that may be needed to continue to manage growth patterns in a manner supportive of VISION 2040.

PSRC is available to provide assistance for future plan updates and additional planning resources can also be found at <http://www.psrc.org/growth/planreview/resources/>. If the county has questions or needs additional information, please contact Yorik Stevens-Wajda at 206-464-6179 or ystevens-wajda@psrc.org.

PIERCE COUNTY HOUSING MARKET STUDY

|| APRIL 2020

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Introduction

PROJECT DESCRIPTION

Pierce County is proposing a set of community plan updates for its unincorporated urban growth areas. This proposal includes a Center and Corridors strategy with several changes to zoning that allow for denser and taller residential building styles. To support its evaluation of the potential impacts of this proposal, Pierce County asked BERK Consulting to conduct an independent housing market study designed to answer two questions:

- **Would the proposed zoning changes likely result in an increase in high-density (25+ units/acre) residential development?**
- **How much high-density residential development would be likely to occur over the next 20 years?**

This report summarizes BERK’s approach to answering these questions and our findings. See Appendix A: Data Sources & Assumptions for a more detailed discussion of the data sources we relied upon to conduct this analysis.

Coronavirus and Economic Impacts

The analysis for this study was conducted in late 2019 and early 2020, before the subsequent economic impacts caused by measures to control the spread of Coronavirus. The findings reflect market conditions before those impact occurred. The uncertainty regarding the timing and rate of recovery are also not considered in our forecast for high-density residential construction.

STUDY AREA

The Study Area includes four Pierce County communities: Parkland-Spanaway-Midland, Frederickson, South Hill, and Mid-County. These communities are located south of Tacoma and west of Puyallup, with residential corridors surrounding 112th Street East, Meridian Avenue (SR-161), and 176th Street. These corridors are the focus of proposed zoning changes, and in certain proposed zones existing residential density limits would be removed. The Pacific Avenue and Meridian corridors are included with Pierce County Transit’s proposed Bus Rapid Transit (BRT) alignments. This housing market study will focus specifically on the Urban Corridor and Towne Center areas within these corridors where proposed zoning allows for high-density (25+ units per acre) residential construction. Further details on these proposed zones can be found on page 18.

Approach

Our study evaluates the potential for high density residential construction in the Study Area under current market conditions, as well as under potential future market conditions within the 20-year planning period. The analysis is broken into four phases: Phase 1- Evaluating growth trends, Phase 2- Assessing market conditions, Phase 3- Pro forma analysis, and Phase 4- Forecasting high-density residential growth.

We began by evaluating recent growth trends in unincorporated Pierce County and Pierce County cities. This included evaluating the characteristics of places where high-density residential development styles are currently being built. Based on this analysis, we identified several styles of new construction that meet Pierce County's threshold for high-density residential development.

Next, we assessed housing market conditions within each of the four Study Area communities as well as nearby jurisdictions where opportunities for high-density residential construction exist. This included zoning and development regulations, market rents, built environment characteristics, incentives, and typical development styles. We also considered how these conditions may change with the proposed upzones within the Study Area and proposed Pierce Transit Bus Rapid Transit Service along Study Area corridors.

We then conducted analysis to assess the feasibility of high-density residential development in each of the four Study Area communities as well as three comparison areas in neighboring jurisdictions. To do this, we used pro forma modeling to estimate the internal rate of return (IRR) for three different development styles on a typical sized parcel. One building style is allowed under current zoning, and two styles are only allowed under proposed zoning. This analysis was designed to answer two questions:

1. Does the proposed upzone create opportunities for a developer in the Study Area to increase IRR for residential development above what is expected with existing development styles?
2. Does the proposed upzone make the Study Area a more attractive place for high density multifamily development when compared to similar opportunities in neighboring jurisdictions?

Finally, we considered the results of the feasibility analysis as well as potential future changes in market conditions to determine a range of possible outcomes with regard to how much high-density residential development could occur with the Study Area during the next 20 years.

A preliminary draft of this approach was presented to key project stakeholders for review and comment. We engaged these stakeholders again for a second round of review and comment. We also interviewed local area developers to obtain qualitative insights into market conditions that shape where high-density development occurs in Pierce County. These interviews also provided feedback on pro forma assumptions used in development feasibility analysis.

PROPOSED BRT SERVICE

Implementation of the proposed bus rapid transit (BRT) service in the Pacific and Meridian Avenue corridors have the potential to impact market characteristics and demand for high-density residential construction. To support our evaluation of these potential impacts we reviewed national research as well as regional development trends along similar BRT corridors in Washington.

In 2015, the National Institute for Transportation and Communities in Portland, Oregon released a national survey of BRT systems which attempts to quantify their impacts on development. **Key findings from this study indicate an increase in development along BRT corridors, both for multifamily and office construction.** The report emphasizes that results are strongest for corridors connecting to employment centers, where opportunities for redevelopment exist, and when paired with economic development incentives. Analysis suggests a rent premium for office space; **however, findings are inconclusive for BRT corridor impacts to residential rental rates.** (Nelson & Ganning, 2015)

Our study also analyzed construction trends along the Swift Blue corridor in Snohomish County (implemented 2009), the RapidRide A corridor in South King County (2010), and the Vine corridor in Vancouver (2017). All three corridors show substantial levels of multifamily development, as shown in Exhibit 2. The Snohomish County corridor shows more growth prior to BRT than post BRT by unit counts, while King County demonstrates an opposite trend. Rates of increase for rental units in both corridors are high but reflective of regional fluctuation. The Vine corridor shows impressive development growth in a short period of time, although it is important to note that its launch coupled with land use policy change promoting multifamily development. Local reporting and agency staff interviews suggest that the integration of tax incentives was a major attraction for many new developments along the corridor, which tend to cluster near the BRT stations. (Hastings, 2017)

Exhibit 2: Development along Regional BRT Corridors

	Swift Blue	RapidRide A	Vine
Year Started	2009	2010	2017
Multifamily Units Prior to BRT	2,953 1998-2008	186 2000-2009	No data
Multifamily Units Since BRT	2,230 2009-2019	1,212 2010-2019	1,151* 2016-2019
Rent Growth Since Service Began	48% Corridor 46% Region	55% Corridor 52% Region	No data

Access to transportation is an important factor when locating residential development. However, it is challenging to isolate the impacts of BRT service specifically on growth patterns. Investments in bus service both respond to growth and increase a location's desirability. Factors such as land use policy and employment growth are also influential drivers of development.

*Projects that appear on MFTE tracking sheet
Sources: CoStar, 2020; [City of Vancouver](#), 2019.

Growth Trends in Pierce County

POPULATION GROWTH TRENDS

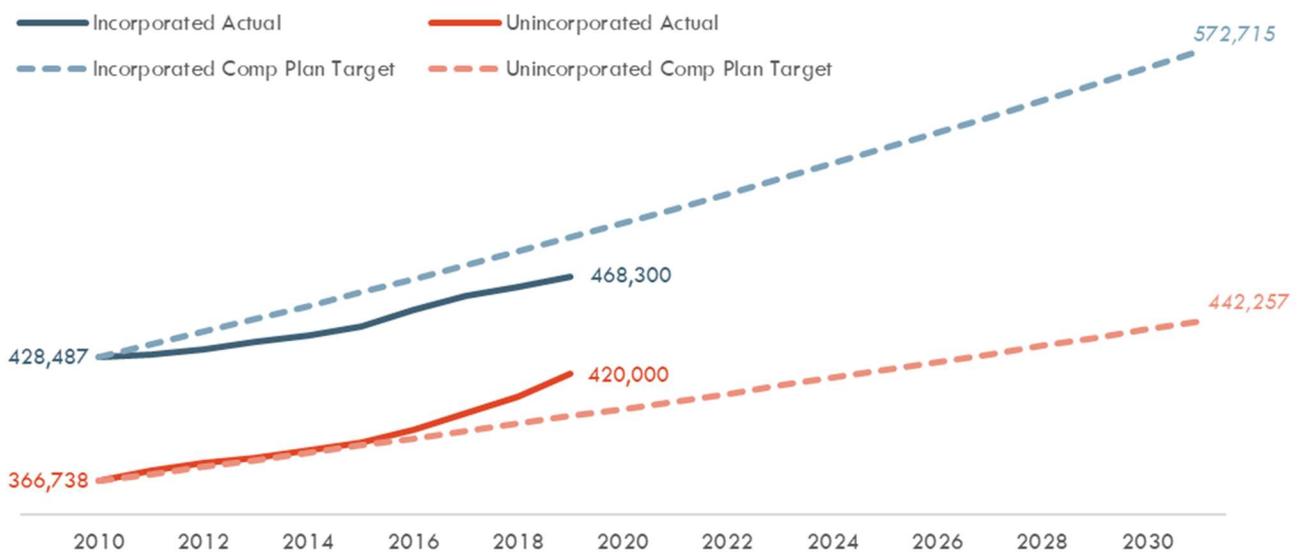
Unincorporated Pierce County has experienced high rates of population growth over the past two decades. Growth rates have consistently surpassed those of the County’s incorporated areas. As shown in Exhibit 3, unincorporated areas of Pierce County have increased their population by 30% over 20 years, while incorporated cities in the County have increased by 20%. Exhibit 4 highlights the current pace of growth in Unincorporated and Incorporated Pierce County compared to Comprehensive Plan targets for 2035.

Exhibit 3: Population Trends in Pierce County, 2000-2019

	2000	2010	2019	Total Growth 2000-2010	Percent Growth 2000-2010	Total Growth 2010-2019	Percent Growth 2010-2019
Pierce County	706,000	795,225	888,300	89,225	13%	93,075	12%
Unincorporated	319,945	366,738	420,000	46,793	15%	53,262	15%
Cities	386,055	428,487	468,300	42,432	11%	39,813	9%

Source: OFM, 2019; BERK, 2020.

Exhibit 4: Population Growth, Actual, Projected and Comprehensive Plan Targets



Sources: Pierce County Comprehensive Plan, 2019; OFM, 2020.

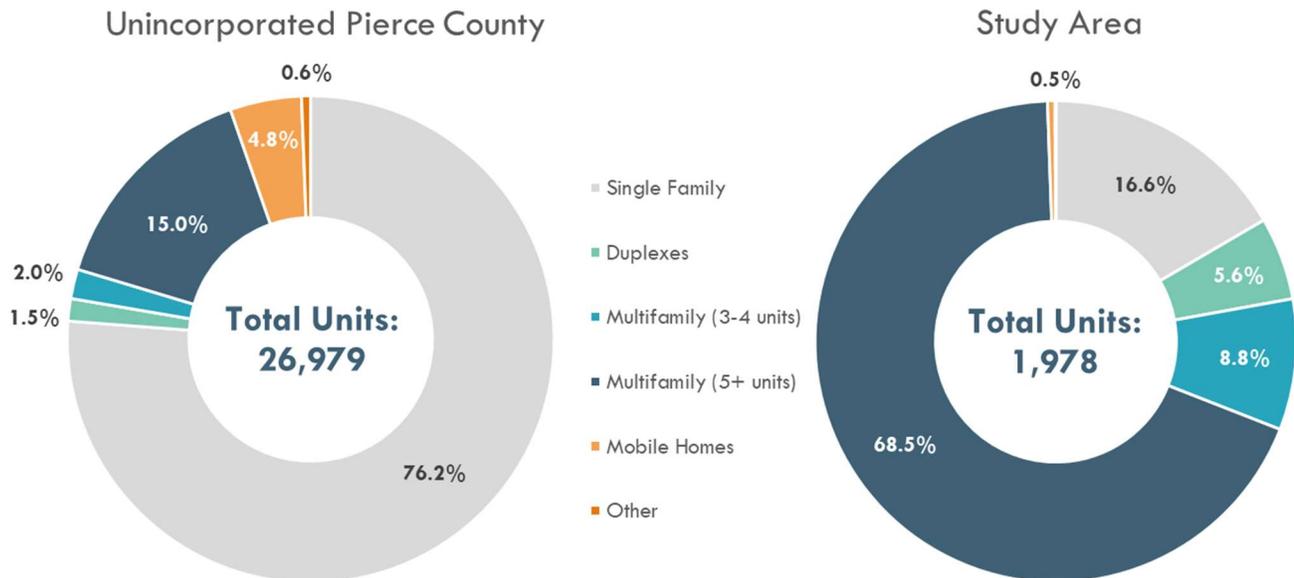
RESIDENTIAL CONSTRUCTION TRENDS

The Study Area has been the focus of multifamily residential growth for unincorporated Pierce County in recent years. Three-quarters of new units developed between 2012-2018 in the Study Area are in multifamily buildings of 3 or more units, as shown in Exhibit 5. A large portion of the nearly 2,000 units developed in the Study Area during this period occurred in the last three years, as shown in Exhibit 6.

Exhibit 5: Pierce County Construction Permits, 2012-2018

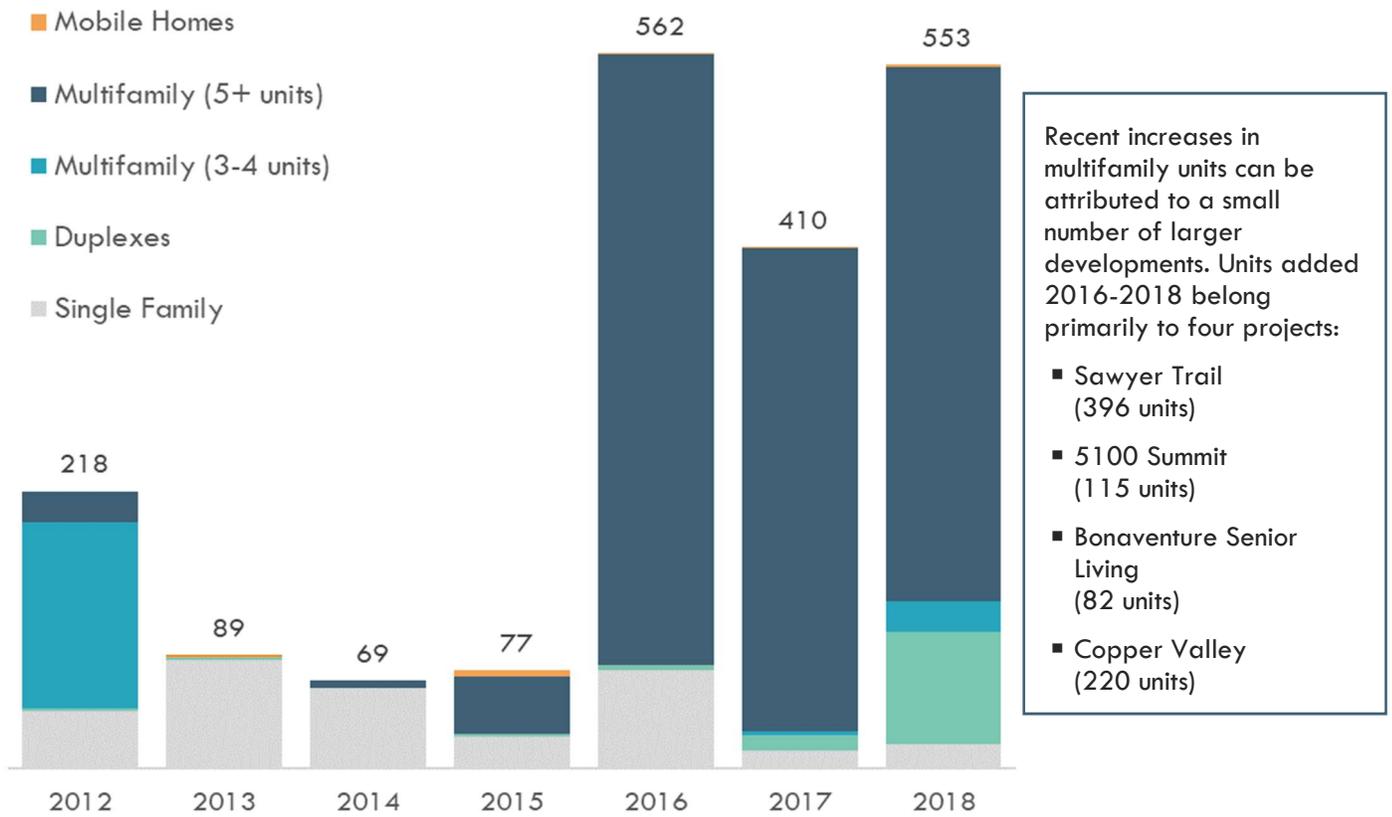
Recent development in the Study Area:

- 1,978 total residential units permitted
- 83% of these are multifamily (2+ units per building)
- Study Area development represents 15% of all residential units and 67% of multifamily units developed in Unincorporated Pierce County



Sources: Pierce County, 2019; BERK, 2020.

Exhibit 6: Units Permitted in the Study Area, 2012-2018



Sources: Pierce County, 2019; BERK, 2020.

Despite the prevalence of new multifamily housing in the Study Area, few developments are achieving the maximum densities allowed by current zoning. Common multifamily development types, such as townhome communities, tend to realize densities between 10-15 units per acre in unincorporated Pierce County. Small lot single family developments are popular as well, with new subdivisions such as Meridian Greens adding 81 single-family units to the South Hill corridor. Exhibit 7 shows residential permits by Study Area community, as well as the overall average permitted units per acre in each area.

Exhibit 7: Residential Permits by Study Area Community, 2012-2018

Neighborhood	Building Permits	% Multifamily Permits	Total Units Permitted	Average MF Project Density (units/acre)
Parkland-Spanaway-Midland	50	26%	264	15.2
Mid-County	13	92%	116	18.3
Frederickson	184	31%	753	22.0
South Hill	84	29%	604	19.4

Sources: Pierce County, 2019; BERK, 2020.

High Density Residential Construction in Pierce County

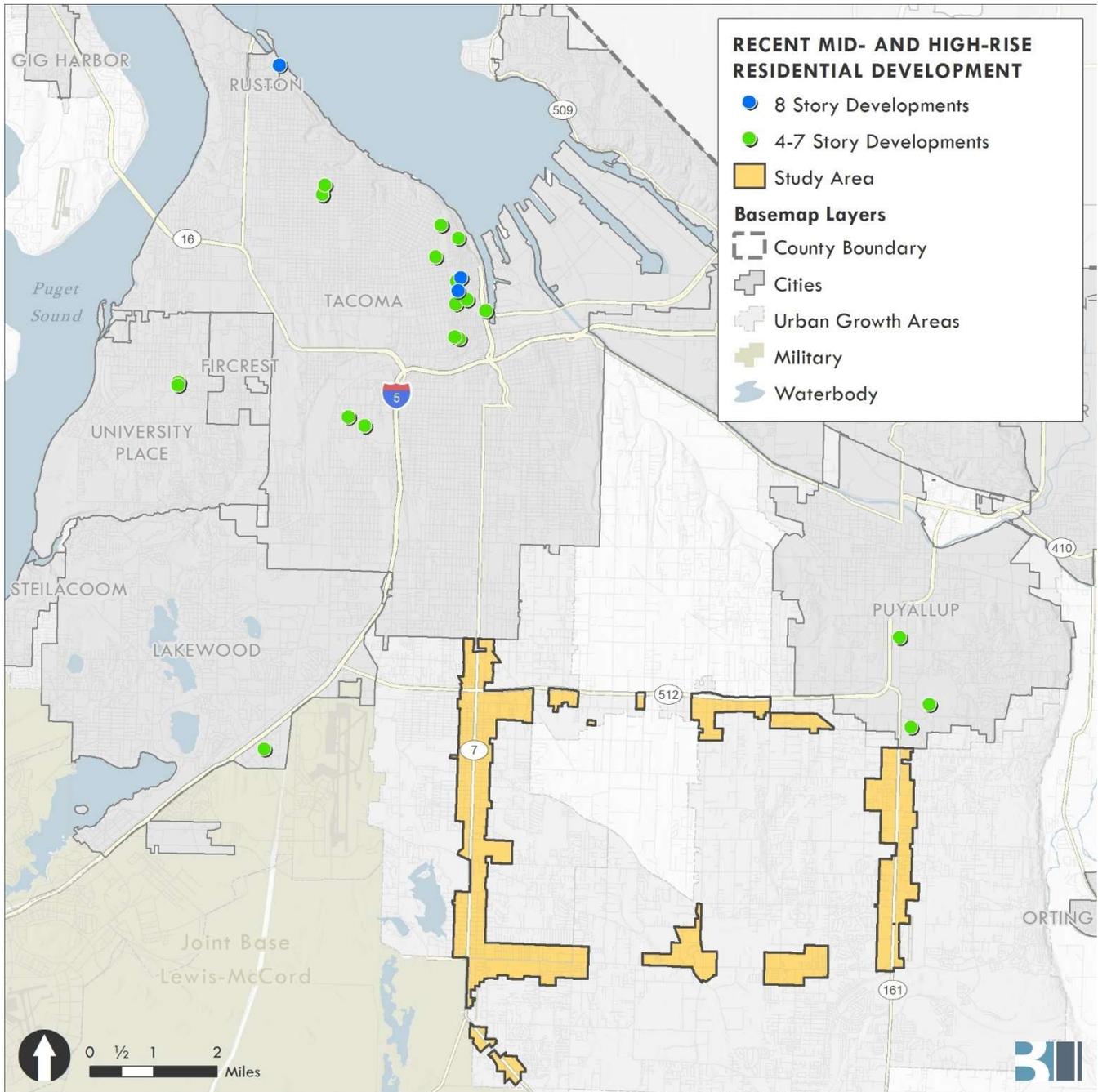
This study defines high-density construction as developments built at 25 units per acre or higher. This level of density can be achieved in building with only three to four stories. However other development regulations, such as minimum parking standards and setbacks, can have a significant impact on achieved densities. While the Study Area has seen several low-rise apartment projects with three stories, very few have exceeded 20 units per acre. A primary reason for this is the relatively high minimum parking standards required in Pierce County (See Exhibit 20). When more land must be set aside for parking, less land is available for housing.

Market-rate developers may choose to develop high-density residential projects when available infrastructure, land use regulations, incentives, and market demand align to promote financial feasibility, or an adequate return on investment. High-density development requires infrastructure to support increased demand for utilities and transportation networks. Zoning and development regulations must allow for taller buildings and/or greater floor area ratios. Jurisdictions can provide incentives through tax and fee reductions. Neighborhood amenities, such as walkability, transit access, proximity to job centers, schools, and other amenities can influence market demand and rents. Tenants must be able to afford higher rental rates to compensate for more expensive construction costs and larger capital investments associated with higher-density construction. Available parcels should be of a size and orientation to support desirable building styles and accommodate parking requirements. Qualitative factors can impact development choices as well, such as established neighborhood character, community resistance to high density development styles, or perceived pushback from design review processes.

In most cases, achieving a development density of 25 units per acre or more in Pierce County requires development styles that are at least four or five stories. Exhibit 8 shows the location of these developments built over the past decade. It shows these development styles are most common in downtown Tacoma, with some more isolated examples in other neighborhoods and jurisdictions. There have been no projects of this size in the Study Area. This trend aligns with several factors that promote project feasibility: downtown Tacoma is a walkable environment (WalkScore of 93 - Study Area WalkScores can be referenced in Exhibit 18), it has effective rents that are 37% higher than in the Study Area and a downtown district with no parking minimums.¹

¹ www.walkscore.com; Costar, 2019; TMC [13.06A.065](#)

Exhibit 8: Mid- and High-Rise Developments in Pierce County, 2010-2020



Sources: Costar, 2020; BERK, 2020.

High-Density Development Styles

We reviewed recent multifamily development projects in Pierce County and similar markets to identify typical building styles that have achieved 25 units per acre or greater. These styles can be organized into three categories.

▪ 3 to 4 Story Buildings with Surface Parking

Multifamily buildings of lower heights can achieve densities over 25 units/acre with the right combination of parking spaces, unit sizes, and lot coverage. These styles feature wood frame construction, a lower-cost building material. These developments typically feature surface parking, which is less expensive than garages or structured lots.

Example 1: The Main Apartments, Sumner (2017)

Height: 3 stories

Units: 108

Parking Ratio: 1.7*

Site Acreage: 3.3

Units/Acre: 32.7

Unit Sizes: 1 and 2 bedrooms



Image Sources: TheMainApts.com, Apartments.com.

Example 2: Vintage at Tacoma, Tacoma Mall (2012)

Height: 4 stories

Units: 231

Parking Ratio: 0.5*

Site Acreage: 3.8

Units/Acre: 61

Unit Sizes: 1 and 2 bedrooms



Image Sources: VintageatTacoma.com, Google.

*Parking ratios for these two developments are approximate (based on site images), as Costar data is not provided.

▪ **5-7 Story Buildings with Structured and/or Surface Parking**

Developments in this size range typically have wood frame construction on the top 4 or 5 floors and masonry or concrete below. These development types are most popular in areas with lower parking requirements, as more expensive structured parking on lower levels can allow for efficient site configuration and higher unit counts. **This style of product will be difficult to achieve in the Study Area with current minimum parking requirements.**

Example 1: The Pacifica Apartments, Tacoma Mall (2013)

Height: 7 stories

Units: 177

Parking Ratio: 0.4 per unit

Site Acreage: 2.9

Units/Acre: 60

Unit Sizes: Studio to 2-bedroom



Image Sources: Costar, Google Maps.

Example 2: Latitude 47, University Place (2015)

Height: 6 stories

Units: 170

Parking Ratio: 0.7 per unit

Site Acreage: 1.03

Units/Acre: 165

Unit Sizes: 90% Studio and 1-bedroom



Image Sources: Costar, Google Maps.

▪ **7+ stories with underground, structured, and/or surface parking**

Buildings achieve taller heights by utilizing concrete and steel frame construction. These materials are more expensive, so developers may offset this cost by building smaller units and/or building more units by incorporating underground parking structures. Lower parking requirements and reduced setbacks help to make these projects financially feasible. Within Pierce County, most projects in this category are clustered in downtown Tacoma where higher rent levels are achieved.

Example 1: Apex Apartments, Tacoma Mall (2009)

Height: 7 stories

Units: 209

Parking Ratio: 0.6/unit

Site Acreage: 2.6

Units/Acre: 80

Unit Sizes: Studio to 3 bedrooms



Image Sources: Costar, Google Maps.

Example 2: Midtown Lofts, Downtown Tacoma (2011)

Height: 8 stories

Units: 51

Parking Ratio: 0.7/unit

Site Acreage: 0.65

Units/Acre: 78

Unit Sizes: 1 - to 3-bedrooms



Image Sources: Costar, Google Maps.

Market Assessment

This section evaluates real estate market conditions in the Study Area and identifies comparison market areas for analysis.

STUDY AREA ZONING: EXISTING AND PROPOSED

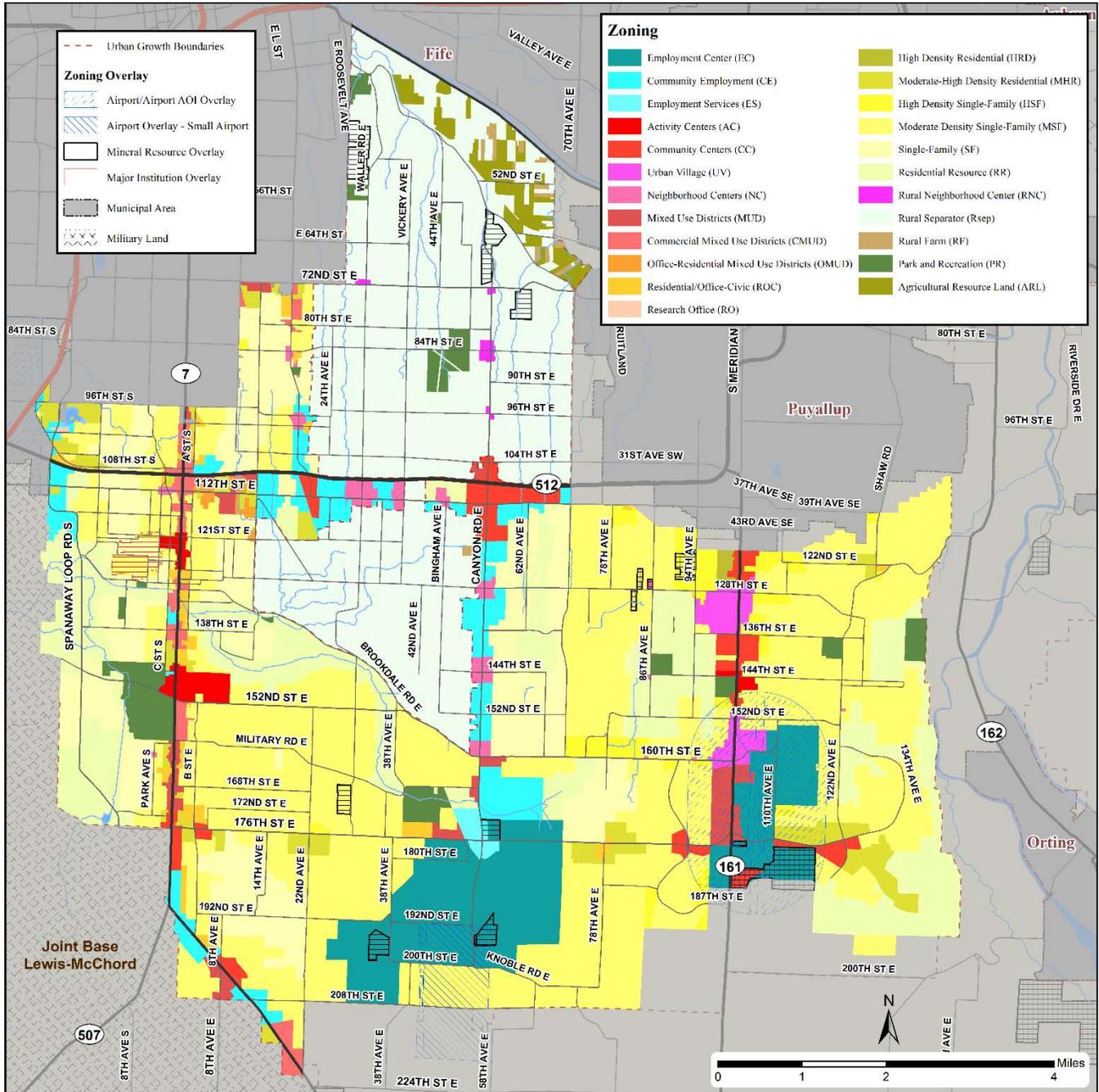
Within the Study Area, there are 16 current zones, 8 of which allow for multifamily residential development and 7 of which allow for densities up to 25 units per acre. Parking requirements are consistent across all residential zones in the Study Area.

Exhibit 9: Existing Zones Located within Study Area

Current Zone - Short	Current Zone - Long	Allows Multifamily	Min Density	Max Density	Max Height	# MF Units 2012-2018
AC	Activity Center	Yes	8	25	60	82
CC	Community Center	Yes	8	25	60	551
CE	Community Employment	No	n/a	n/a	60	
CMUD	Commercial Mixed Use District	Yes	8	25	60	
HRD	High Density Residential	Yes	6	25	40	223
HSF	High Density Single Family	No	6	12	40	
MHR	Moderate-High Density Residential	Yes	8	25	45	141
MSF	Moderate Density Single Family	No	4	6	35	
MUD	Mixed Use District	Yes	12	25	60	219
NC	Neighborhood Center	Yes	4	16	60	1
ROC	Residential/Office-Civic	Yes	8	25	60	467
RR	Residential Resource	No	1	3	35	
SF	Single Family	No	4	4	35	
UV	Urban Village	Yes	12	30	70	53

Sources: Pierce County Zoning Code [18A.15](#), 2020; BERK, 2020.

Exhibit 10: Existing Zoning in and around the Study Area



Source: Pierce County Community Plan Updates DEIS, 2019.

Exhibit 11: Proposed Zones for Study Area

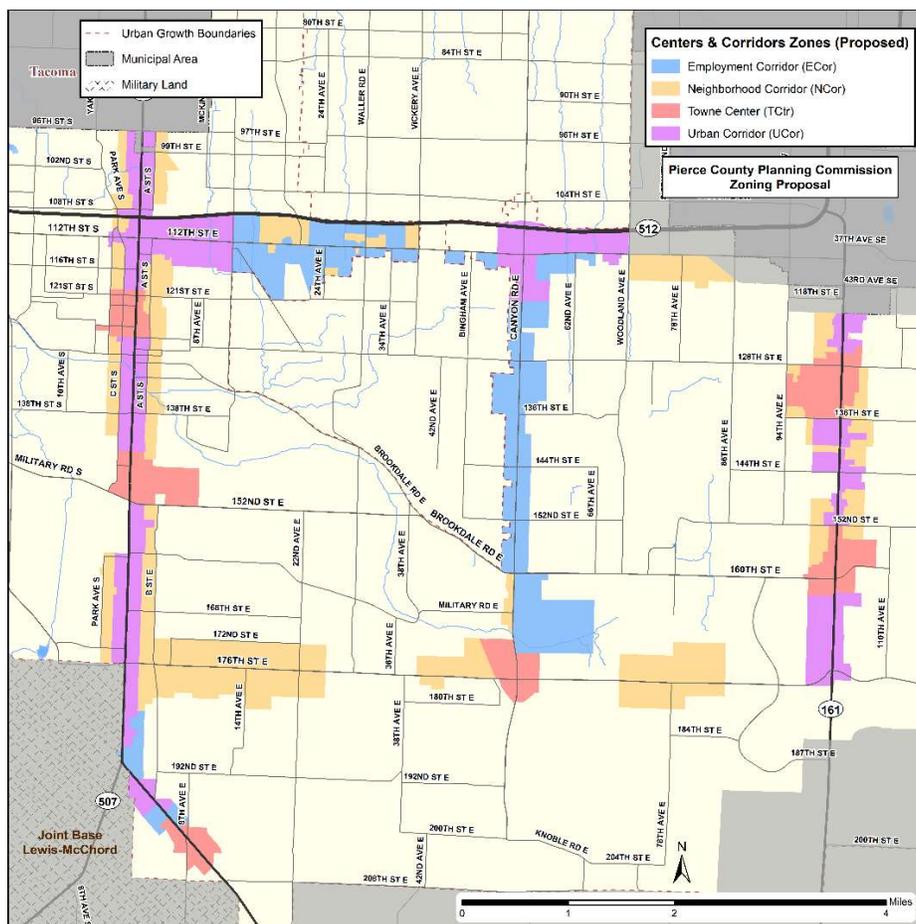
Zone Name	Allows Multifamily	Minimum Density	Maximum Density	Height
Employment Corridor	No	n/a	n/a	65
Neighborhood Corridor	Yes	6	25	45
Neighborhood Mixed Use	Yes	6	16	45
Towne Center	Yes	20	None	65/75/85*
Urban Corridor	Yes	12	None	45/55/65*

*Permitted outright/10% income-restricted units/20% income-restricted units

Sources: Pierce County, 2019; BERK, 2020.

The proposed zones eliminate current density limits in Towne Center and Urban Corridor areas. Minimum densities and height limits are raised for many areas as well, particularly in towne centers. These revisions rely on height restrictions, parking requirements, and landscaping requirements to moderate the density of site design rather than set a fixed density limit.

Exhibit 12: Map of Study Area, Proposed Zoning



Source: Pierce County, 2020.

STUDY AREA COMMUNITY PROFILES

The Study Area includes parts of four different Pierce County communities: Parkland-Spanaway-Midland, Frederickson, Mid-County, and South Hill. Proposed zoning changes affect each of these four communities, with most of the high-density residential uses proposed in Parkland-Spanaway-Midland and South Hill along the corridors of Pacific Avenue and Meridian Avenue, respectively, as shown in Exhibit 12. We used real estate market data and development trends to characterize the differences between these four communities, focusing on factors most relevant for project feasibility analysis. The results are shown in Exhibit 13 and the following community profiles.

- On average, higher rents per square foot can be found in Frederickson and South Hill and lower rents per square foot found in Mid-County and Parkland-Spanaway-Midland.
- South Hill and Frederickson have seen the most multifamily units developed since 2012 by a wide margin. Both neighborhoods achieve higher densities with multifamily projects.
- Parkland-Spanaway-Midland is a future BRT corridor, increasing its likelihood for residential development in coming years (See discussion on page 20).

Exhibit 13: Residential Market Characteristics by Community

	Parkland-Spanaway-Midland	South Hill	Frederickson	Mid-County
Rent/SF, 1-bedroom	\$1.65	\$1.89	\$1.91	\$1.60
Cap Rates	5.3%	4.9%	4.7%	4.8%
Units permitted 2012-2018	264	604	753	116
Average density of new construction 2012-2018	10.4 units/acre	17.3 units/acre	17.4 units/acre	17.8 units/acre*
Average parcel size	0.49 acres	0.70 acres	0.75 acres	1.03 acres

*Based on one multifamily project of 115 units.

Rent/SF taken from most recent market rate multifamily projects in each community

Sources: Costar, 2020; Pierce County permit data, 2019; BERK, 2020.

Frederickson

- Frederickson covers the 176th Street corridor of the Study Area.
- Recent residential development in Frederickson features Sawyer Trail Apartments (pictured below) as well as dense single family and townhome developments on either side of the commercial development centered on Canyon Road.
- This neighborhood reports the highest multifamily rental rates of the four in the Study Area.
- Only one area of Frederickson, at the intersection of 176th Street and Canyon Road, will be eligible for high-density residential construction.

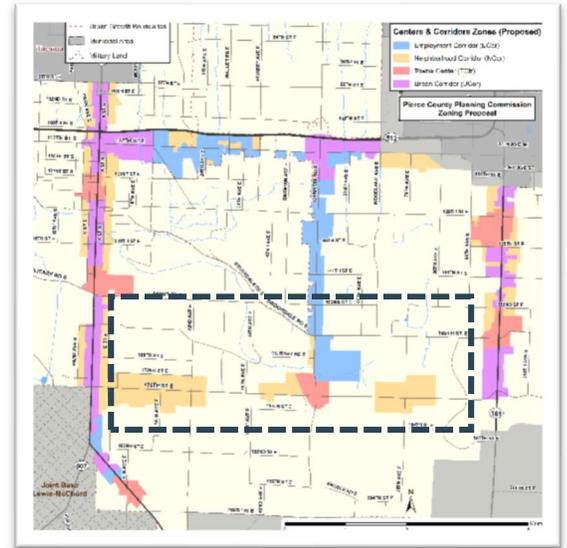
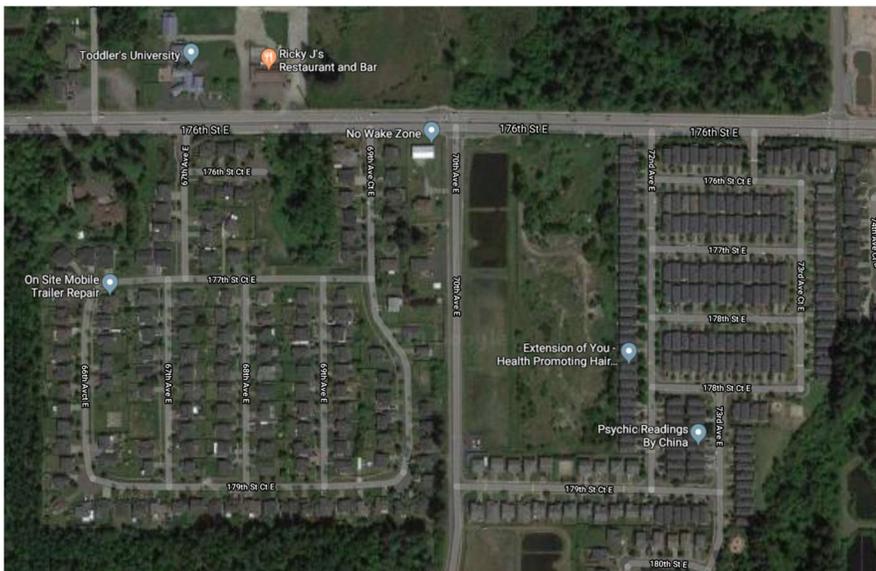


Exhibit 15: Development Patterns from the Study Area in Frederickson



Left: Sawyer Trail Apartments is a 50-acre development including 396 apartment units in 3-story buildings, 90 duplex units, and two currently undeveloped parcels on either side.



Beneath: Single family homes are a common residential development style in Frederickson, with varying lot sizes.

Image Sources: Google Maps, 2020

Mid-County

- Mid-County includes the 112th Street East corridor of the Study Area, as well as the northern half of the Canyon Park commercial north-south corridor.
- This corridor has experienced the least amount of multifamily development over the 2012-2018 period. 5100 Summit, shown below, is its newest apartment development with twelve buildings containing 115 apartment units.
- The character of existing development in Mid-County includes larger lot single family homes, low density commercial development, and low-rise multifamily.
- Rental rates are the lowest among the Study Area corridors.

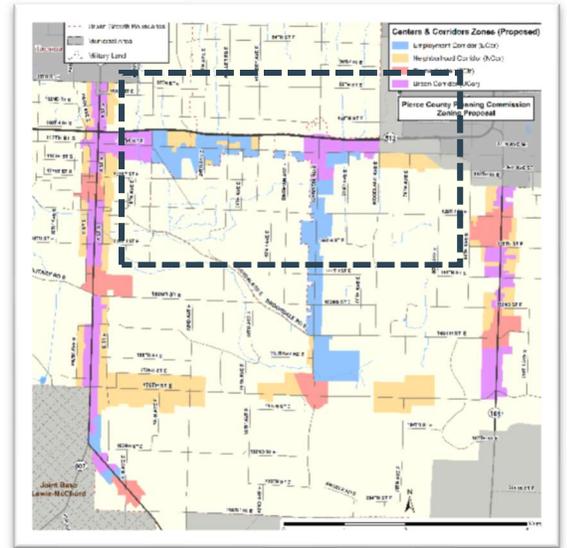
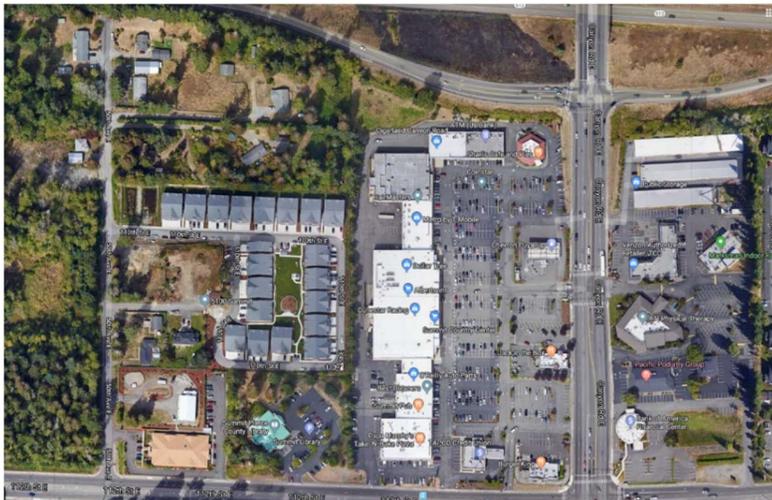


Exhibit 16: Development Patterns from the Study Area in Mid-County



Left: 5100 Summit is an apartment development of low-rise (2 and 3 story) buildings adjacent to the commercial corridor along Canyon Road.



Beneath: Single family homes on larger lots are common in Mid-County as well.

Image Sources: Google Maps, 2020

South Hill

- South Hill includes the eastern portion of the Study Area, along the Meridian Avenue corridor.
- This neighborhood has by far experienced the most multifamily development in the Study Area in recent years.
- The Meridian Avenue corridor is home to the two densest developments since 2012, Copper Valley (220 units) and South Hill by Vintage (216 units). These mid-rise developments achieve very close to 25 units/acre density and are both income-restricted affordable housing developments.
- Development character along Meridian features primarily low-density commercial development and mid-rise multifamily.

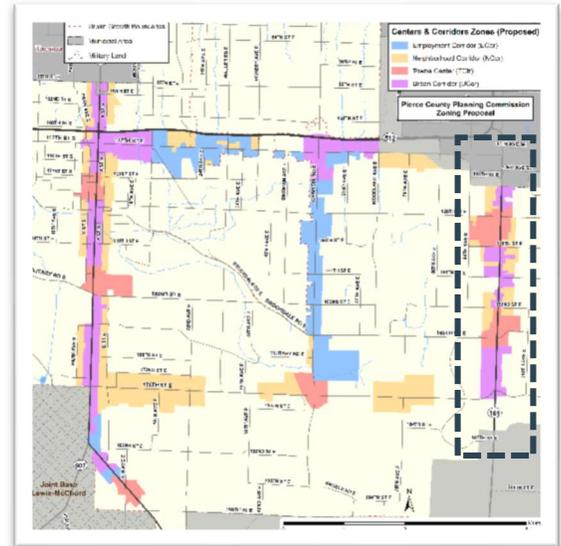
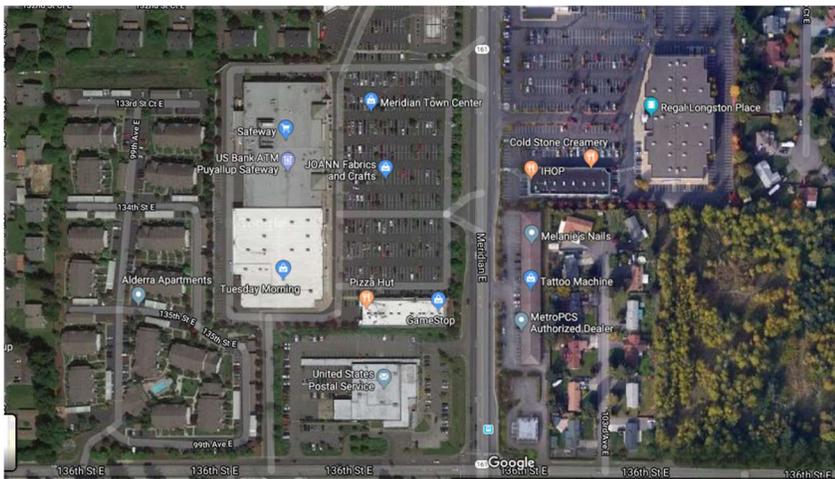


Exhibit 17: Development Patterns from the Study Area in South Hill



Left: Commercial development and multifamily units are often adjacent in South Hill.

Beneath: South Hill by Vintage is an eight building, 216-unit affordable housing development achieving one of the highest densities in the Study Area.

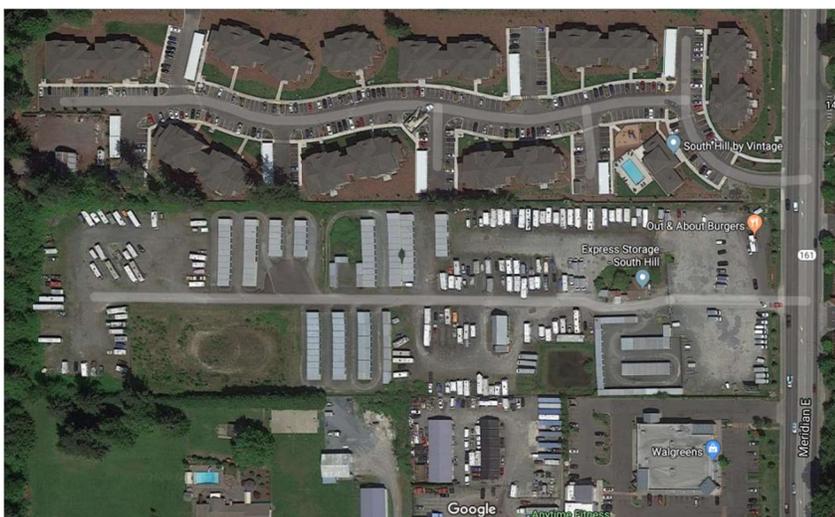


Image Sources: Google Maps, 2020

COMPARISON AREAS

Developers considering whether to build a mid-rise residential building in Pierce County may consider alternative opportunities in neighboring jurisdictions. Therefore, it is helpful to compare project feasibility across neighboring jurisdictions. Even if a project appears feasible within the Study Area, if there are similar opportunities 10 miles up the road that offer substantially better return on investment, the alternative location may see significantly more development.

We compared opportunities for 25+ units per acre development across Pierce County and selected Tacoma Mall, Downtown Puyallup, and University Place Town Center as comparison districts for pro forma modeling purposes. These three areas allow high-density construction, are regionally situated near the employment hubs of Downtown Tacoma and Joint Base Lewis-McChord, and have similar market conditions to the Study Area in terms of rent per square foot, rental growth rates, and neighborhood WalkScores. Market conditions are reflected in pro forma assumptions and summarized below.

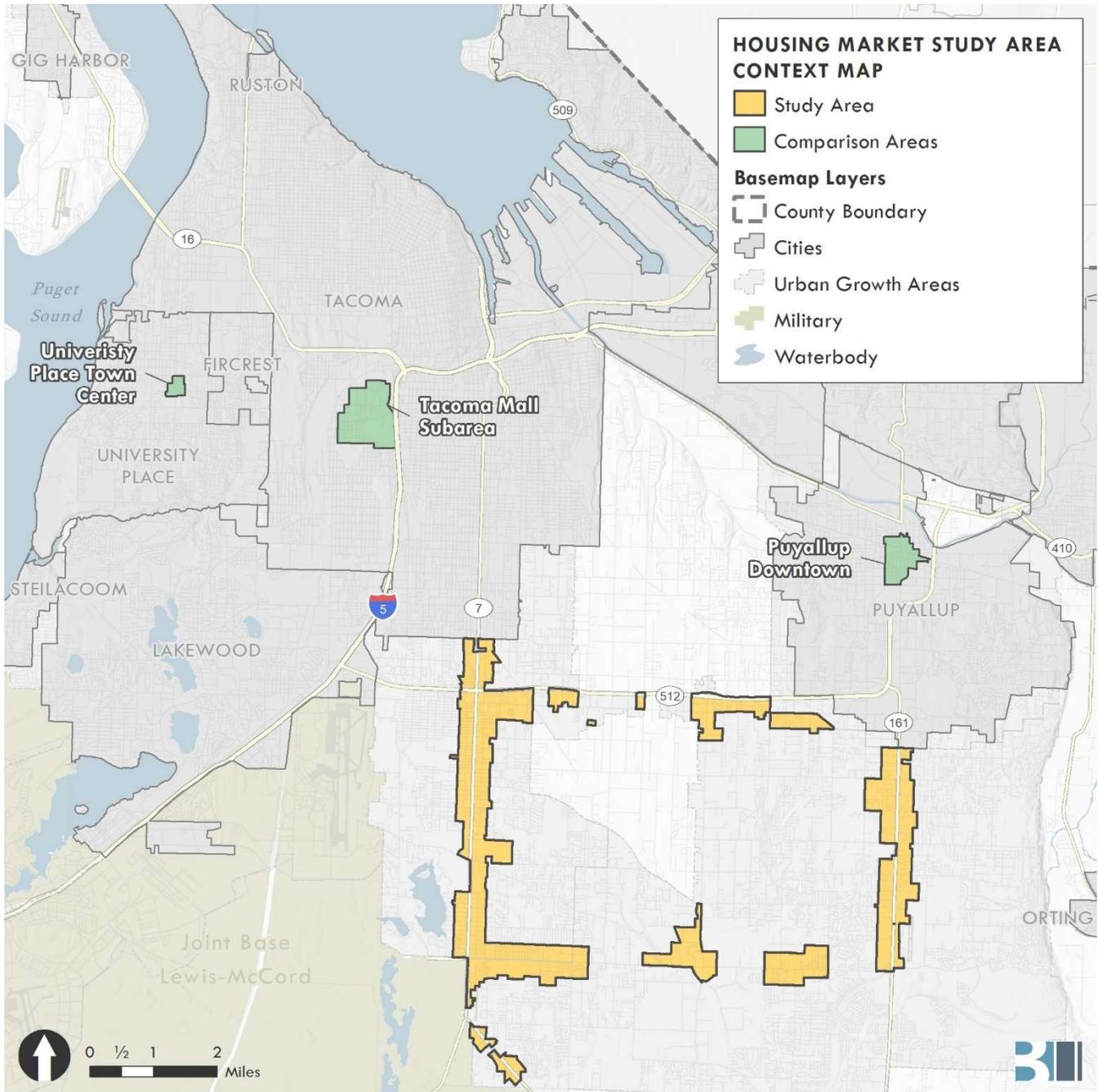
Exhibit 18: Market Conditions in Comparison Areas, 2019

	Parkland-Spanaway-Midland	South Hill	Frederickson	Mid-County	Tacoma Mall	University Place	Puyallup
Rent/SF, 1-bedroom	\$1.65	\$1.89	\$1.91	\$1.60	\$1.76	\$1.74	\$1.52
Rental growth rate	4.4%	4.4%	4.4%	4.4%	3.9%	4.8%	4.8%
Cap Rates	5.3%	4.9%	4.7%	4.8%	6.1%	5.1%	5.4%
Multifamily units to market 2012-2019	104	880	647	255	576	270	217
Walkscore*	71	54	37	60	64	79	68

*See Appendix A for methodology detail

Sources: Costar, 2020; WalkScore, 2020; BERK, 2020.

Exhibit 19: Context Map, Study Area and Comparison Districts



Sources: Costar, 2020; Pierce County, 2019; City of Tacoma, 2020; University Place, 2020; Puyallup, 2020; BERK, 2020.

Zoning and Development Regulations

Each comparison district varies with zoning regulations and affordable housing incentives, which impact the finances of potential development projects. Parking minimums range for 0.5 per dwelling unit in the Tacoma Mall district to 1.5 per dwelling unit for multi-bedroom apartments in Puyallup. Each comparison area has lower parking standards than those found in the Study Area, impacting project site design and achieved densities.

Another major difference between comparison areas and the Study Area is the presence of Multifamily Tax Exemption (MFTE) benefits. MFTE provides 8 to 12-year property tax relief for project improvements on buildings of four or more units, typically with longer time periods associated with the provision of income-restricted affordable housing.

Other differences reflected in our analysis include: property tax rates, land values, and impact fees. These variables impact project finances, particularly upfront capital costs. Land values and tax rates both tend to be higher for incorporated cities, although tax rates are less consequential with MFTE in place.

Exhibit 20: Zoning in Comparison Areas

	Parking Requirements	Affordable Housing	Minimum Density	Max Height	Other Notes
Study Area Towne Center Zoning	1.5 – 2.25 per dwelling unit	<ul style="list-style-type: none"> ▪ Parking reductions 	20 units/acre	65' or 85' with affordable units	
Study Area Urban Corridor Zoning		<ul style="list-style-type: none"> ▪ Additional building height ▪ Fee waivers 	12 units/acre	45' or 65' with affordable units	
Tacoma Mall	0.5 per dwelling unit	<ul style="list-style-type: none"> ▪ Mandatory inclusionary zoning ▪ No parking minimums 	40 units/acre	75' – 120' depending on location	12-year MFTE with affordable units
University Place Town Center	1 – 1.5 per dwelling unit	<ul style="list-style-type: none"> ▪ Parking reductions ▪ Density bonus 	20 units/acre	55' – 120' depending on location	8-year MFTE for market rate and 12-year MFTE with affordable units
Puyallup Downtown	1.5 - 2 per dwelling unit	Legislation pending	Most zones do not have a minimum density	55' – 125' depending on zone	8-year MFTE for market rate and 12-year MFTE with affordable units

Sources: Pierce County Code [Title 18A](#), Tacoma Municipal Code [Title 13](#), University Place Municipal Code [Title 19](#), and Puyallup Municipal Code [Title 20](#).

Development Feasibility Analysis

To evaluate feasibility and likelihood of high-density construction in the Study Area, we conduct pro forma analysis on three development types: one allowed under current zoning and two new styles allowed under proposed zoning. Pro forma analysis models the cost to build and finance a new development, expected revenues from rental units once the building is open for occupancy, and expected gains upon sale after a multiyear hold period. Internal Rate of Return (IRR) is a metric that takes all these expenses and gains into account and estimates the overall financial benefit of a project to the investor. This metric is commonly used as one indicator of project feasibility, or the likelihood that a developer would choose to move forward with it.

Each development style incorporates a mix of studio, 1-bedroom, 2-bedroom, and 3-bedroom units. For consistency, a single parcel size was tested across development styles (3 acres). Unit counts and building sizes are relatively stable but adapt to fit the relevant zoning regulations. For example, a location with lower parking requirements will see a higher unit count accommodated within the same development style and parcel size. This is because less area needs to be set aside for surface parking or expensive structured parking.

The primary questions answered through this analysis are:

3. Does the proposed upzone create opportunities for a developer in the Study Area to increase IRR for residential development above what is expected with existing development styles?
4. Does the proposed upzone make the Study Area a more attractive place for high density multifamily development when compared to similar opportunities in neighboring jurisdictions?

DEVELOPMENT STYLES TESTED

Style A: Low-Rise Apartments



Sawyer Trail Apartments (Image Source: Google Maps)

STYLE A: Low-Rise Apartments

Height: 3 stories

Parking: Surface

Income-restricted affordable housing: No requirement

Units per acre with current Pierce County zoning regulations: 20

Notes: Represents highest density style currently found in Study Area

Style A represents the higher density styles which are currently being constructed within the Study Area. This low-rise development style keeps building costs lower than higher-density styles by using wood-frame construction and surface parking lots. Often, site design incorporates shared amenity spaces such as gyms, pools, or greenspace. In the Study Area, Style A includes 60 units and 115 parking spaces.

Style B: Mid-Rise Apartments



The Reserve at Everett (Image Source: CoStar)

Style B is a mid-rise apartment development, varying in height 4-7 stories based on zoning regulations. This development style maximizes site potential while keeping costs lower: parking is still in surface lots, and building frames are wood for the top 4 floors and concrete podium for anything below. Similar to Style A, site design will often incorporate outdoor shared amenity spaces. For Urban Corridor locations in the Study Area, Style B features 105 units and 205 parking spaces. Towne Center locations increase the unit count to 135 and parking spaces to 260.

Style C: Maximizing the Envelope



Apex Apartments at Tacoma Mall (Image Source: ApexApartments.com)

Style C maximizes the potential of a site within the Towne Center zone. This development style builds to the maximum height by incorporating 20% affordable units and opts to build garage parking in addition to surface spaces to increase the total number of units that can fit on a site. Steel frame construction and underground lots increase construction costs while building height maximizes the total unit count. In the Study Area, Style C accommodates 240 units and 415 parking spaces.

STYLE B: Mid-Rise Apartments

Height: 4-7 stories (depending on zone)

Parking: Surface

Income-restricted affordable housing: No requirement

Achieved units per acre with proposed zoning regulations in the Study Area: 35-45

Notes: Represents highest density style under new zoning without building a parking structure or incorporating affordable units

STYLE C: Maximizing the Envelope

Height: 8 stories

Parking: Surface + Garage

Income-Restricted Affordable Housing: 20%

Achieved units per acre with proposed zoning regulations in the Study Area: 80

Notes: Represents highest density style under new zoning, builds underground parking to accommodate more units

TEST SCENARIOS

We test pro formas across the Study Area and comparison districts for an evaluation of IRR across varying development and market conditions. Style A is only tested within the Study Area, as it is an existing style for the communities. Style C is not tested in Urban Corridor locations as height restrictions never allow for eight stories, where steel frame construction becomes relevant. These 16 pro formas shed light on the range of development feasibility for multifamily products within the Study Area and the three comparison areas.

Pro forma inputs consistent across geographies

- Lot size
- Cost of building materials
- Size and ratio of unit types
- Ratio of common space to residential space

Pro forma inputs that vary within Study Area

- Rental rates
- Building height (Style B, based on zone)

Pro forma inputs that vary between comparison districts

- Rental growth rates
- Cap rates
- Land costs and property tax rates
- Quantity of parking spaces and units
- Affordable housing incentives
- Impact fees and MFTE policy

Exhibit 21: Pro Forma Test Locations and Styles



	Style A	Style B	Style C
Park-Span-Mid <i>Sprinker Towne Center</i>	●	●	●
Frederickson <i>Towne Center</i>	●	●	●
South Hill <i>Urban Corridor</i>	●	●	-
Mid-County <i>Urban Corridor</i>	●	●	-
Tacoma Mall	-	●	●
Puyallup	-	●	●
University Place	-	●	●

PROJECT FEASIBILITY

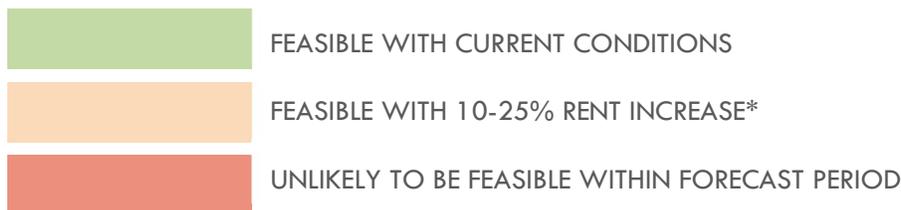
Study Area

- In the Study Area, Style A feasibility is confirmed in three of the four communities. Parkland-Spanaway-Midland shows lower returns, reflective of lower rental rates along this corridor. This could change with anticipated transit investments and increased population growth. But it is consistent with low rates of multifamily development in the community.
- The financial feasibility of Style B is not confirmed for any neighborhood in the corridor under current assumptions. Additional building costs outweigh the benefits of increased rental income for this product type, as modeled.
- Style C is the least feasible of the three development styles. Higher construction costs associated with steel frame buildings and garage parking dramatically impact building costs and expected gains in rental revenue, and the projected sale value does not balance out these capital investments.
 - This model incorporated 20% of units as income-restricted affordable housing. Even when all units are assumed to be market rate (not possible under current regulation) the style remains infeasible.

Key Takeaway: Feasibility decreases for taller, higher density project types.

Exhibit 22: Pro Forma Feasibility Results by Study Area Location

	STYLE A	STYLE B	STYLE C
Parkland-Spanaway-Midland Towne Center	Feasible with 10-25% Rent Increase*	Unlikely to be Feasible	Unlikely to be Feasible
Frederickson Towne Center	Feasible with Current Conditions	Feasible with 10-25% Rent Increase*	Unlikely to be Feasible
South Hill Urban Corridor	Feasible with Current Conditions	Feasible with 10-25% Rent Increase*	Exceeds proposed height limits
Mid-County Urban Corridor	Feasible with Current Conditions	Feasible with 10-25% Rent Increase*	Exceeds proposed height limits



*This represents a 10-25% increase in the year 1 rental rates, as shown in Exhibit 18, and assumes consistent annual rental growth rates

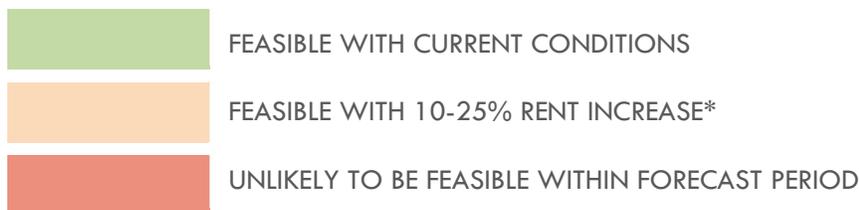
Comparison Areas

- Comparison area pro forma modeling yielded similar results for Styles B and C as the Study Area analysis.
- One notable difference is the feasibility of Style B for University Place. This aligns with observed development trends in these areas.
 - Compared to the Study Area communities, University Place has slightly higher rental rates and rental growth rates, slightly lower parking requirements, and an 8-year MFTE program. These factors combine to encourage project feasibility.
 - Tacoma Mall also shares slightly higher rental rates and much lower parking requirements than the Study Area, alongside a 12-year MFTE program. However, the 20% affordable unit requirement for this development, combined with higher land costs and slower rental growth rates, renders the project infeasible under current conditions.
- Style C remains infeasible across the board. This is consistent with observed development trends.²

Key Takeaway: Comparison area feasibility is generally similar to the Study Area locations. University Place shows favorable market conditions for Style B.

Exhibit 23: Pro Forma Feasibility Results by Comparison Area Locations

	STYLE A	STYLE B	STYLE C
Tacoma Mall	<i>Not included</i>		
University Place Town Center	<i>Not included</i>		
Puyallup	<i>Not included</i>		



**This represents a 10-25% increase in the year 1 rental rates, as shown in Exhibit 18, and assumes consistent annual rental growth rates*

² It is important to note that an example of Style C, Apex Apartments, exists in the Tacoma Mall neighborhood. This was built in 2009, however, and no similar style projects have been developed in the decade since. [Reporting](#) on this project includes documentation of financial losses by project investors, resulting in [legal dispute](#).

Forecast for High-Density Residential Construction

The final question posed in this study is “How much high-density residential development is likely to occur during the next 20 years?” As explained in the previous section, our findings indicate that it is very unlikely that Pierce County would see short-term changes in development styles following the proposed Centers and Corridors upzone and no other changes to development regulations. However, if demand for housing remains high and rents continue to increase, mid-rise development (Style B) could become financially feasible within the 20-year forecast period, and this development style would likely exceed the 25 unit per acre “high-density” threshold. Given the significant uncertainty over how market conditions, and demand for housing, will continue to evolve in Pierce County over the next 20 years, we developed a forecasting approach that includes a range of potential outcomes.

Our projections indicate that, in most cases, low-rise development styles will likely continue to offer the highest IRR for the foreseeable future. Nonetheless there will likely be instances where the characteristics of a development opportunity lend themselves to a higher density building format. To estimate the frequency with which this could occur, we chose to analyze at historic development activity in an area with similar market characteristics where higher-density residential construction has been allowed under existing zoning. The area we selected is the Tacoma Mall, where we examined recent development activity prior to passage of the inclusionary zoning ordinance in 2018. The result of this analysis is shown in Exhibit 24. It shows that among eight multifamily building projects, two were mid-rise buildings that accounted for over half of all multifamily units developed during the time period.

Exhibit 24 Multifamily Building Permits in the Tacoma Mall Subarea, 2012-2018

Project Type	Number of MF Projects	% of Total MF Projects	Total MF Units	% of Total MF Units
Townhome/Duplex	5	63%	48	10%
Low-Rise	1	13%	177	38%
Mid-Rise	2	25%	237	51%
TOTAL	8		462	

Source: CoStar, 2020; BERK, 2020.

Based on this finding, we will assume that 51% of all new multifamily units built in the Study Area over the next 20 years will be for mid-rise buildings. This assumption is likely higher than is realistic given the results of our development feasibility projections and analysis of historic building trends in the Study Area. However, using a more aggressive assumption like this will help to ensure our forecast does not under-estimate potential new high-density residential development.

Next we analyzed historic multifamily building permit activity in the Study Area to project the number of multifamily building permits that could be expected over the next 20 years. Unincorporated Pierce County has been growing at a rapid pace in recent years, as shown in Exhibit 3. Within the Study Area, the last three years have seen a boom in permit activity, as shown in Exhibit 6. Exhibit 25 shows average annual multifamily unit production in the Study Area over two periods of time. The longer period of

2001-2018 provides a reasonable basis for a longer-term projection, given that it includes periods of economic downturn that would be expected to occur a 20-year period. However, as comparison, we also include the more recent short-term (2012-2018) permit trends that show an acceleration of permit activity and larger building styles.

Exhibit 25: Average Annual Multifamily Unit Production in the Study Area

	Average Annual Units	% Townhomes/Duplex	% Low-Rise
2001-2018	170	<i>Breakdowns by development style unavailable prior to 2012.</i>	
2012-2018	234	9%	91%

Source: Pierce County, 2020; BERK, 2020.

To determine how many additional units would be produced in mid-rise buildings compared to their low-rise alternatives, we leveraged the sample pro forma work BERK conducted to develop the Style A (low-rise) and Style B (mid-rise) building format for the two Study Area zones examined: Towne Center and Urban Corridor. Our calculations indicated that a Style B building would produce, on average, about 175% of the units that a Style A building given the same parcel size and same parking requirements. It would produce an even bigger boost (280%) compared to the average townhome or duplex development. Based on historic permit trends in the Study Area, the average boost can be assumed to be about 184%.

Exhibit 26 shows how these forecasting assumptions are used to develop two separate growth forecasts with a range of potential outcomes. The Moderate Growth Forecast is based on longer-term historic permit activity (2001-2018). The Rapid Growth Forecast is based on much shorter-term permit activity (2012-2018). The bottom of this table shows the 20-year forecast for high-density residential production within the Study Area as well as the number of additional units produced compared to a scenario without the Centers and Corridors upzone. In total, we forecast that the Study Area would see between **3,217** and **4,422** new units in high-density residential development over the next twenty years if Pierce County moves forward with the proposed upzone. This forecast is based on a projection of continued market demand for multifamily housing and continued annual growth in rents. It assumes no other changes in development regulations such as parking requirements or incentives which can have a significant impact on project feasibility, particularly for mid-rise and high-rise development.

Exhibit 26: High-Density Housing Forecast for Study Area

	Moderate Growth Forecast	Rapid Growth Forecast
Average annual new multifamily units	170	234
Projected new multifamily units without upzone, 2020-2040	3,407	4,683
Centers and Corridors Upzone Scenario		
Assumed percentage of units that will be mid-rise	51%	51%
Multiplier for unit capacity in mid-rise projects compared to historic development styles	184%	184%
Average annual mid-rise unit production	161	221
Total mid-rise unit production, 2020-2040 (High-density housing forecast range)	3,217	4,422
Average annual total multifamily unit production	244	335
Total multifamily unit production, 2020-2040	4,876	6,703
Total additional units expected with upzone (compared to no upzone)	1,470	2,020

Source: BERK, 2020.

Conclusions

Our findings indicate that, in the short-term, the proposed zoning changes are not expected to have a significant impact on development styles built within the Study Area. Significant market changes and/or additional regulatory change are required to encourage high-density residential construction. High rates of growth in rents, improved walkability within neighborhoods, or decreased parking requirements could encourage denser styles. Regulatory incentives such as MFTE programs make a significant impact on IRR but are not allowed throughout most of the Study Area. Over time, however, rent inflation and population growth may encourage some market shifts in development products without dramatic regulatory change.

This analysis concludes the following key takeaways:

1. Significant short-term impacts are unlikely.

- Style A (low-rise) continues to offer the highest IRR in our models in all areas tested
- High-density building styles are not likely to be feasible in the short-term
- No significant change in the relative attractiveness of Study Area corridors for high-density development compared with comparison areas in nearby jurisdictions

2. There are several barriers to high-density development in Study Area.

- Minimum parking requirements
- High construction costs associated with high-density building styles
- Lower market rents compared to other parts of the region
- Affordable housing incentives are not strong enough to entice market rate development

3. Some potential, but limited, medium-term impacts.

- Style B (mid-rise) could become more feasible if rents continue to increase
- In most cases Style A (low-rise) is likely to continue being the more attractive option for apartment developers in the Study Area

4. Highest density styles are least likely to become feasible.

- Style C (highest density, with affordable housing) is not likely to be feasible for market-rate developers without significant changes to market conditions or development regulation

In the Rapid Growth Forecast we estimate the potential for **2,020 additional units** compared to a scenario without the Centers and Corridors upzone. This estimate is somewhat lower than the 2,646 estimate that appears in the Community Plan Updates Draft Environmental Impact Statement. In total, we forecast that the Study Area would see between **3,217** and **4,422** new units in high-density residential development over the next twenty years if Pierce County moves forward with the proposed upzone. This forecast is based on a projection of continued market demand for multifamily housing and continued annual growth in rents. It assumes no other changes in development regulations such as parking requirements or incentives which can have a significant impact on project feasibility, particularly for mid-rise and high-rise development.

Appendix A: Data Sources & Assumptions

Data Sources

Data used for this project includes:

- Pierce County permit data
 - Dates on this dataset are for permits, not for finished construction.
 - For larger developments, assumptions had to be made about which lots are included in the overall development for the DU/acre calculation. We do not have perfect information about future plans or building out parcels currently left open.
- Pierce County assessor data
 - Merged with permit data to include building features such as height and value into the analysis.
- CoStar development data
 - This is only available for Pierce and King Counties, we were unable to use in Vancouver.
 - CoStar market analytics estimate achieved rents by unit size, which was used to set rental rates by geographic location.
 - Co-Star may not pick up on all smaller multifamily developments.
- City of Tacoma permit data
- OFM housing unit data
- Pierce County Comprehensive Plan growth targets
- Pierce County DEIS housing forecast

Pro forma inputs

- Construction costs
 - Estimated by building style, based on developer feedback and regional industry reporting.
 - Annual increase for inflation estimated at 3% per year.
- Loan terms
 - Standard loan terms, based on current market conditions, were used across all pro formas. This includes a 60% LTV ratio, a 6.5% interest rate for construction loans, and a 5.0% interest rate on a 30-year fixed rate mortgage.
- Land values
 - Costar reporting for relevant multifamily projects was used to estimate land value per acre in comparison areas.
 - Study area land values were calculated by joining Pierce County permit data with assessor

data for parcels within the study area.

- Market conditions

- Rent per square foot, by number of bedrooms in unit, informed by Costar data. Newest and highest value multifamily units were considered when determining these rates to avoid depressed values from older or subsidized housing developments.
- Market cap rates taken from Costar. Assumed consistent across time.
- Rental growth rates taken from Costar, averaged annual from the 2012-2019 period.
- Vacancy rates considered consistent across project types and locations, with year 1 at 50% occupancy and 95% stabilized occupancy.

Appendix B: Stakeholder Engagement and Developer Interviews

Stakeholder Engagement

As a primary stakeholder, the City of Tacoma was engaged throughout the process of developing this study and reviewing document findings. Representatives were included at the scope refinement meeting on December 12, 2019; for a mid-project methodology review on January 28, 2020; and for a draft report review and comment released March 6.

Preliminary report findings were presented before the Pierce County Planning Commission at a public meeting on February 25th.

The draft report was reviewed by Pierce Transit, WSDOT, FutureWise, and Tacoma Audobon Society.

Developer Interviews

As part of this project, BERK Consulting spoke with regional real estate professionals to lend perspective on development feasibility and construction costs in Pierce County and the Study Area. This included real estate brokers active in marketing multifamily properties in the Study Area and multifamily developers with recent projects and current land holdings in the Study Area as well as in comparison districts. While the overall developer response rate was lower than desired, these conversations were influential to several project assumptions.

- Confirmed market cap rates in Study Area and comparison areas.
- Confirmed market barriers to construction in Study Area.
- Estimated construction costs for modeled building styles.
- Implications of planning policies such as parking minimums on project feasibility.
- Confirmed regional demand for multifamily housing units.

Appendix C: Bibliography

Works Cited

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