



City of Tacoma

City Council

October 27, 2020

Pierce County Council
930 Tacoma Avenue South
Room 1046
Tacoma, WA 98402

Re: Community Plan Updates

Dear Chair Richardson and Honorable Members of the Pierce County Council,

The Tacoma City Council would like to express our appreciation for your work as our fellow policy makers with regard to planning for population and economic growth in the South Sound region that we all call "home." We understand the complexities and the need for balancing competing interests that are inherent in setting smart growth policy. With that in mind, we respectfully submit this letter to express our perspective and concerns with the proposed Centers and Corridors Community Plan updates.

Our City Manager provided letters during the scoping, Draft Environmental Impact Statement, and Planning Commission hearing process as the City participated in the review process at the staff and Planning Commission level. These letters are resubmitted as attachments for direct entry into the record for full Council consideration of the Centers and Corridors proposal, summarized and reiterated as below.

The Environmental Impact Statement (EIS) remains inadequate in that it does not fully analyze impacts from development related to the proposed code changes, including impacts to Tacoma and other neighboring jurisdictions.

- It remains unclear that Pierce County has the capacity to provide levels of service requisite for urban levels of development.
- It underestimates the amount of development that is likely to occur and therefore does not analyze the impacts from that development, especially in light of the questions surrounding infrastructure capacity.

It is understood that the EIS is a non-project review and is meant to be high-level analysis related to changes in policy. However, the EIS is tied to very real actions in the rezones and development standards proposed in the Community Plan Updates. The claim that *capacity* for development is irrelevant when the *probability* of development is much lower (as shown through the housing study, for example), without any controls on development, is problematic. It is like opening the doors widely but only assuming that one horse of the herd will leave the barn. Growth management is not just an idealistic pursuit—it's good business. Just like when a business expands, municipal entities need to plan and fund the investments needed to guide and sustain that growth.

While the Centers and Corridors concept is a valid vision for urbanizing the unincorporated area and accommodating growth, the infrastructure and services currently are not in place to support the growth the rezones and code changes will allow. Along Pacific Avenue, where high capacity transit is planned and funded, it is appropriate to complete the upzones at this time. But that is not the case elsewhere, where there is no policy or funding commitment to providing urban transportation, infrastructure and services. This is especially true and of concern along Portland Avenue where upzones would directly impact Tacoma's 72nd and Portland Avenue Mixed-Use Center.

Acknowledging that unincorporated Pierce County can and should grow when the time is right does not mean any and all growth is good. Opening the doors wide to growth without a clear funding strategy for the essential building blocks of urban neighborhoods just kicks the can down the road, with little hope of catching up. As the Metropolitan City in Pierce County, Tacoma is responsible to accommodate the largest proportion of expected growth under the Vision 2050 population allocations. Tacoma has made the upfront investments over decades in connected streets, infrastructure, neighborhood centers and other essential urban building blocks in preparation for that growth. The City understands the need for Unincorporated Pierce County to accommodate growth as well; however, as it stands upzoning in most of the Centers and Corridors geography would result in neighborhoods lacking in walkable, connected streets, raising concerns about the capacity of schools, utilities and services. While developers may benefit in the short-term, it's the residents of all of Pierce County who would pay the long-term environmental, economic and social costs.

The City believes that Pierce County can accommodate increased population with an incremental and rational implementation of rezones and urbanization. With that in mind, the City can support a phased implementation of the Centers and Corridors Plan and Community Plan Updates as follows:

- Rezones should be evaluated only as high capacity transit is planned and funded for an area, along with other urban level infrastructure and services. This would allow a more thorough and meaningful environmental analysis with each incremental rezone. For areas that are not along the planned Bus Rapid Transit line, including Portland Avenue, rezones should be delayed.
- The County should complete a Supplemental Environmental Impact Statement to clearly establish phasing the zoning and development standard changes. This would allow a more realistic analysis of potential and probable growth, as well as establishing future environmental review parameters as each upzone is considered.

The Growth Management Act sets forth policy direction for long-range planning that can preserve open space and rural areas while facilitating growth to occur in targeted areas where public and private investment can be maximized. Should the County Council choose to pass the Community Plan updates in

their current form, the City of Tacoma will evaluate all options, including a potential appeal to the Growth Management Hearings Board, to address our concerns.

We welcome further discussion with you on growth policy in our area and hope that you will consider the issues raised in this letter as you continue your deliberations on the ordinance.

Yours in service,

[Insert signatures]