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**Consulting, Inc.**

January 20, 2017

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

Honorable Doug Richardson, Council Chair  
Pierce County Council Office  
County City Building  
930 Tacoma Avenue South, Room 1046  
Tacoma, WA. 98402-2100

Re: Evaluation of the Urbanization of Pierce County - Resolution No. R2016-79s

Dear Pierce County Executive and Council Members:

**Introduction**

The Pierce Communities Coalition (Coalition), an ad hoc committee of citizen representatives of the Urban Growth Area (UGA) communities of South Hill, Fredrickson, Parkland, Spanaway, Midland, and Summit View, has retained TBA Consulting, Inc. to conduct a review and evaluation of a number of issues, outlined below, relevant to the implementation of Pierce County Resolution No. R2016-79s, **Attachment "A."** The following narrative, findings, conclusions, and opinions are based upon my review of public records, discussion with county officials, my personal knowledge and evaluation of Pierce County operations, and my professional experience with Pierce County and the Pierce County Public Works & Utilities Department, where I served the citizens of Pierce County for nearly 32 years – 15 years as County Engineer:

The Coalition seeks your continued support of community based planning which is officially recognized by the State Growth Management Act (GMA) as "sub-area plans." More specifically, the Coalition requests that the Pierce County Council and Executive address the Coalition's concerns outlined herein by the inclusion of these issues within implementation of the work program related to Resolution R2016-79s to the extent necessary to fully understand the probable negative, or unintended consequences, of moving forward with the work program and concepts contained in the *PSRC Plan Review Report & Certification Recommendation*, dated April 28, 2016.

It is my understanding that legal representatives for the Pierce Communities Coalition will submit an independent legal opinion to address whether the Puget Sound Regional Council (PSRC) has authority over Pierce County elected officials with regard to comprehensive land use planning, or whether PSRC authority is limited to "transportation" related issues. The following discussion will not address PSRC authority, but rather the probable negative or unintended consequences of complying with presumed PSRC authority and the work program incorporated into Resolution R2016-79s.

### **Background and Summary of Requests**

The Coalition has expressed concerns related to Resolution R2016-79s and the work program and schedule for proposed annexations and incorporations within the identified UGA which has been previously promoted by County staff as the so-called "City of Pierce" initiative option, **Attachment "B."** It must be noted that the Coalition does not oppose urbanization of the identified UGA, improvement of area roads to urban standards, extension of sewers into the area, or annexations of small "island areas" which are clearly affiliated with surrounding municipalities. The Coalition's specific concerns are itemized below, in the following order of discussion:

1. Potential Tax Consequences of Annexations and Incorporations
2. Densification and Rate of Creating Developable Lots
3. Concurrency Related to Transportation
4. Concurrency Related to Sanitary Sewer and Sole-Source Aquifer
5. PSRC Certification Recommendations
6. State Growth Management Act
7. Bending the Trend

The Coalition requests that implementation of Resolution R2016-79s, if continued, will work with and for the citizens of unincorporated Pierce County to plan locally through existing community based planning documents, preserving local control, rather than succumbing to regional PSRC dictates that are not consistent with desired community goals and policies generated by the communities themselves. The dialogue with "sub-area plan" communities should occur in conjunction with the cities so that the process keeps historical communities together and does not create non-viable cities as we move into our collective future.

The Coalition also seeks your support in exploring, through an open dialogue forum, the pros and cons associated with the faulty assumption that, "All unincorporated lands within the urban growth area will either annex into existing cities or incorporate as new cities." The following discussion will demonstrate that Pierce County should continue to be the provider of area urban services which is far more likely to succeed than if individual cities take on that challenge. Pierce County elected officials should first consider the potential consequences of shifting the property and gas tax to cities through annexations and incorporations within unincorporated Pierce County.

## **1. Potential Tax Consequences of Annexations and Incorporations**

Pierce County officials should carefully examine the State gas tax allocation formula to fully understand the potential consequences of surrendering Pierce County's tax base through annexations and incorporations as envisioned in Resolution R2016-79s. Simply, a new or expanded city does not inherit the State gas tax allocation for those County roads turned into City streets. After annexation or incorporation, the money previously earmarked for Pierce County would be reallocated to the other 38 counties in the state. The new or expanded cities created by annexation or incorporation would then be forced to compete for gas tax allocation from the bucket already being sucked dry by all the other cities within the state. In short, the winners of a Pierce County decision to surrender its tax base through annexations or incorporations would be all the other counties in the State. The losers would be the remaining unincorporated areas of Pierce County as well as the newly created or expanded cities within Pierce County. The Washington State gas tax allocation formula may not appear logical or fair, but it is the tax allocation formula currently in place.

The annexation or incorporation of the identified UGA as envisioned in Resolution R2016-79s will adversely impact Pierce County's tax base and ability to continue providing quality roads and related infrastructure in the unincorporated areas of Pierce County. For example, mainland Pierce County generally supports the roads and infrastructure associated with the Peninsula area of the County. Tax revenues from Pierce County's UGA generally support the rural areas located outside the UGA such as Graham and east Pierce County. Thus, the shifting of property and gas tax to cities through annexation or incorporation of the County's UGA will reduce tax revenue for the rest of unincorporated Pierce County. It would be difficult to maintain the vast mileage of roads in the County's rural areas if the only remaining tax base is limited to the rural areas of the County.

A rural tax base is the leading cause of maintenance challenges for rural counties in the state as well as small cities which can not afford the costly expense of providing urban services to their citizens. Some cities within Pierce County such as Tacoma currently have some of the most poorly maintained streets in the region. Fortunately, other small cities are currently able turn to Pierce County for maintenance of road and urban infrastructure through inter-agency agreements. It is the availability of inter-agency agreements between Pierce County and the small cities that allows Pierce County to provide, on a massive economic scale, the urban services to the small cities and the county from the same service base. A decision by Pierce County to reduce its tax and service base through annexations or incorporations would damage Pierce County's ability to provide urban services to the small cities. For example, potential small cities such as Midland, or Spanaway, or South Hill would probably not be able to provide its citizens with urban services, particularly when larger cities such as Tacoma are unable to properly maintain its own roads and urban services. Moreover, if Pierce County's tax and service base is reduced through annexation or incorporation, it is probable that the small cities would no longer be able to turn to Pierce County for urban services through inter-agency agreements. The loss of Pierce County's existing unincorporated areas would reduce the tax base necessary to provide urban service not only to unincorporated Pierce County, but also to existing and potential future small cities.

Pierce County's existing tax and urban service base currently has the critical mass necessary to maintain quality roads and urban services for the citizens of Pierce County as well as the small Cities through inter-agency agreements. Pierce County and City officials should carefully evaluate and consider the consequences of damaging Pierce County's ability to continue providing these necessary and cost-effective urban services. The financial "lessons learned" by several recently formed cities within Pierce County should be examined by elected officials to determine the probable consequences of ill-advised cityhood. Elected officials should also consider the related public safety and liability consequences of poorly maintained roads and infrastructure as well as the increased costs related to multiple redundant service jurisdictions and the potential need for costly private contractors. Finally, County and City officials should identify the jurisdiction that could be able to maintain quality roads and urban services before Pierce County elected officials dismantle Pierce County's tax and urban service base through annexations and incorporations as envisioned in Resolution R2016-79s

## **2. Densification and Rate of Creating Developable Lots**

The Coalition is concerned that Pierce County is planning to exceed Regional and County-wide urban growth policies related to development densities in the identified Urban Growth Area through the initiative proposed in Resolution R2016-79s. For example, under the initiative, the County is working to densify residential development on 7,200 square foot lots that measure 60 feet x 120 feet in size. The Coalition is opposed to such extreme urban densification and supports a more reasonable and livable residential density.

The Coalition is concerned that the Director of Planning and Lands Services (PALS) has publicly advocated creating as many developable lots as fast possible through a reallocation of land into buildable lots without permanent sewer utilities. The Director proposes that, during the interim, lots could be developed and supported by community drain fields which would be considered "temporary" in nature. However, as history has shown, "temporary" often means "for a very long time," since the plan for permanent sewer utilities to serve the increased lot density is not forthcoming.

Urban development is required to be concurrent with infrastructure under State law to prevent foreseeable public harm that would occur if urban densification is allowed to occur without the necessary concurrent utilities and transportation facilities. The proposal to lower or eliminate the concurrency standards appears to be a well thought out strategy to achieve densification while somehow anticipating concurrency through the "back door."

It is apparent that, regardless of the densities allowed, the subject UGA will eventually be built out to "full capacity." In other words, at some point in the future there will be no more room in the UGA for additional urban development. It would appear prudent for Pierce County elected officials to strive to create a "livable environment" at full development capacity, rather than simply trying to squeeze as many lots and people onto an acre as physically possible. The Coalition has suggested that a "livable environment" would include

lots size with enough room for off-street parking, several trees, and a lawn area large enough to walk on and to absorb storm water runoff. Existing examples of over-densified residential lots within Pierce County reveal row after row of residential structures packed 6 feet apart and which raises serious questions related to fire safety, emergency ladder access to second floors, emergency vehicle and fire truck access, as well as the livability of the over-densified residential areas. The Coalition urges County officials to focus on creating a "livable" Pierce County community that we all currently enjoy today. Therefore, County officials should consult the public on topics related to densification, lot size, the associated timetable to develop lots, concurrency of urban services, and what jurisdiction will be saddled with the responsibility to provide urban services.

Pierce County's effort to increase densification through redevelopment along the transportation corridors of Pacific Avenue and Meridian Avenue should also be carefully considered. The Coalition urges the County to focus on creating livable communities and a healthy urban environment, rather than just trying to squeeze as many people per acre as possible. There are many examples where high-rise apartments and commercial developments have led to the demise of valuable communities, such as the Ballard Community in Seattle. It is no secret that Pierce County is actively supporting redevelopment of certain formerly built out areas to improve the prospects for those areas to become annexed in the future. One such example is the Garfield area and Pacific Avenue corridor just outside the limits of the City of Tacoma. In order to prevent another Ballard Community scenario, the Coalition urges County officials to also consider the impute and desires of the existing built-out communities of Pierce County.

### **3. Concurrency Related to Transportation**

The Director of PALS has publicly advocated creating as many developable lots as fast as possible without the necessary concurrent infrastructure such as public road systems. Again, under state law, Pierce County is required to maintain "concurrency" between urban development and infrastructure such as roads. Without concurrency, urban development may not be adequately supported by roads which are required for public health and safety. Pierce County's Transportation Concurrency Management System (TMCS) 2015 Annual Report states as follows (emphasis added):

"After years of steady declining of arterial miles with daily V/S ratio of 1.05 or above, the deficient County arterial miles increased between 2013 and 2014."

"Future Concurrency reports will incorporate new thresholds as proposed in the 2015 Comprehensive Plan as well as new processes derived through the Traffic Impact Fee update."

"In the future, the County Council could take various actions in addressing concurrency deficiencies, such as development moratoria, adjustment of the Allowable Service Standard, or other potential measures as identified and allowed by the GMA. These options are later discussed in Section 4."

Pierce County's traffic congestion continues to increase and the Coalition is concerned that Pierce County is attempting to sidestep State and regional policies which require essential public services and "concurrency" of public infrastructure at the time of development. The Coalition is justifiably concerned that without adequate transportation systems the movement of traffic will be ineffective and the community's safety and quality of life will be diminished.

According to the *Pierce County Transportation Plan Update Congestion and Improvements White Paper Final Draft* dated December 29, 2008, Pierce County had experienced significant population growth over the past two decades. The overall County population grew from 586,200 in 1990 to an estimated 805,400 in 2008 (Source: Washington State Office of Financial Management). This represents growth of 37% in the 18-year period, or nearly 2% annually. Population growth resulted in increased traffic levels in most parts of the County. The areas accommodating the unincorporated growth typically do not have a well developed grid network of roadways and are served by a limited number of overburdened state highways and local arterials. Expansion of these facilities has generally not kept pace with growth and traffic congestion. The lack of alternative transportation within the subject UGA will require continued reliance on personal vehicles for travel.

a) **Pierce County's measurement of traffic congestion.**

To address traffic congestion, Pierce County's first system-wide level of service (LOS) standards were adopted within the 1994 Comprehensive Plan. This measurement method consisted of averaging congestion on parallel facilities crossing a set of "screen-lines." This method of averaging did not identify any existing LOS deficiencies while identifying only a limited amount of future deficiencies.

In 2003, a new tool was adopted that measures congestion on individual facilities. The system is based on a "V/S ratio," which is a measure of the daily traffic volume divided by a "service threshold" on individual roadway segments. Service thresholds can be likened to capacity measurements. The V/S method is utilized in Pierce County's Traffic Impact Fee Program and Concurrency Management System (as mandated by GMA). The newer method is generally regarded as providing a more realistic portrayal of roadway congestion than the previous "screen-line" system. Service thresholds vary depending on the number of lanes of a roadway facility together with the presence of turn lanes and/or turn pockets.

The findings according to the annual report covering 2007 showed that thirty-one (31) County roadway segments had a V/S of 1.0 or higher. A select set of State facilities were also analyzed under the same V/S parameters in order to show the relative performance of parallel facilities.

The report also projected 2030 V/S ratios which showed that there were expected to be 21.2 miles of County roadways exceeding the Service Standard of 1.0, all in the urban area, representing 2.9% of the total County arterial miles. This would result in an increase from the 14.4 miles exceeding the Standard in 2007, despite the significant amount of roadway

widening assumed to have been completed by 2030. For the graphic illustrations, see **Attachment "C."**

The following discussion will demonstrate that Pierce County recognizes and understands its obligation to ensure that urban development remains concurrent with required urban infrastructure. This understanding appears in stark contrast to the PALS Directors' proposal as envisioned in Resolution R2016-79s and the so-called "City of Pierce" initiative.

**b) Pierce County recognizes its obligation to require transportation concurrency.**

Pierce County has long recognized its obligation to require transportation concurrency and to address traffic congestion in a manner that sustains quality of life and safety consistent with the GMA timeframe and anticipated growth. For example, Pierce County's Draft - September 2016 Capital Facilities Plan Summary, Exhibit "B" to Pierce County Ordinance No: 2015-56, beginning at page 1, confirms that Pierce County recognizes its obligation to ensure that urban development remains concurrent with required infrastructure (emphasis added):

"The Capital Improvement Program (CIP) is the operational implementation of the Capital Facilities Plan (CFP). The CFP is one of the elements of Pierce County's comprehensive plan that is required by Washington's Growth Management Act (GMA). The GMA requires the CFP to identify public facilities that will be needed to address development expected to occur during the next six years. The CFP must identify the location and cost of the facilities and the sources of revenue that will be used to fund the facilities needed to support development. The CFP must be financially feasible; in other words, dependable revenue sources must equal or exceed anticipated costs. If the costs exceed the revenue, the County must reduce its level of service (LOS), reduce costs by implementing non-capital alternatives or other methods, or modify the land use element to bring development into balance with available or affordable facilities. Other requirements of the GMA mandate forecasts of future needs for capital facilities and the use of standards for levels of service of facility capacity as the basis for public facilities contained in the CFP. As a result, public facilities in the CFP must be based on quantifiable, objective measures of capacity, such as traffic volume capacity per mile of road or acres of park per capita. One of the goals of the GMA is to: "Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use . . .".

"In Pierce County, concurrency is required for sanitary sewer, septic and community systems, water, surface water, County roads, transit, and ferries. For these facilities, the following is required: 1) facilities serving the development to be in place at the time of development (or, for some types of facilities, that a financial commitment is made to provide the facilities within a specified period of time), and 2) such facilities have sufficient capacity to serve development without decreasing LOS below minimum standards adopted in the CFP. The GMA requires concurrency for transportation facilities. For transportation facilities, concurrent with development means "improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years." GMA also requires public facilities and services to be "adequate." These public facilities and services include: streets, roads, highways, sidewalks, street and road lighting systems, traffic signals, domestic water systems, storm and sanitary sewer systems, parks and recreational facilities, schools, fire protection and suppression, law enforcement, public health,

education, recreation, environmental protection, and other governmental services. The County's development regulations, adopted July 1995, implement the plan and provide detailed regulations and procedures for implementing the requirements of the plan. Why Plan for Capital Facilities? The purpose of the CFP is to use sound fiscal policies to provide adequate public facilities consistent with the Land Use Element on a schedule concurrent with, or prior to, the impacts of development in order to achieve and maintain adopted standards for level of service, and to exceed the adopted standards, when possible.”

In addition, the August 23, 2016 staff report submitted by Pierce County Engineer, Brian Stacy, presents the "2017-2022 Transportation Improvement Program (TIP)" and indicates that Pierce County has specific obligations with regard to road segments that have failed to meet concurrency, as identified below (emphasis added):

“Failed Concurrency Road Segments. - The TIP plays a vital role in responding to both current and future transportation needs. Failed Concurrency road segments identified in Pierce County's Transportation Concurrency Management System (TCMS) may be included in the TIP as a remedy. The TCMS addresses the Washington State Growth Management Act (GMA) requirement to set and maintain level of service standards for the arterial roadway system. The TCMS “Annual Report provides in-depth information and analysis on the current and future states of transportation concurrency in Pierce County.

“If roadway segments have failed concurrency the County Council, as part of its Capital Facilities Plan, must specifically list the road segment(s) that have failed concurrency and identify a remedy or remedies. Council may approve remedies such as establishing development moratoria; identifying a specific financial commitment and time schedule for an improvement that will eliminate the concurrency violation; increasing the Service Standards; declaring that a road segment has been built to its ultimate capacity, and that its therefore exempt from concurrency requirements; providing non-capital alternatives or other unidentified measures.”

Additionally, Pierce County's 2017-2022 Draft Transportation Improvement Program, page N-8, related to concurrency deficiencies of arterial roadways, presents the County's "future plans for transportation improvement programs and projects." Specifically (emphasis added):

“Concurrency/Capacity: Concurrency/Capacity projects are included in the TIP based on the evaluation of information contained in the “Transportation Concurrency Management System” (TCMS). The TCMS identifies County arterial roadway congestion levels and concurrency deficiencies in the current year and subsequent 5 years. Concurrency projects include roads and corridors that fail to meet established service level thresholds....

“The V/S ratio is a measure describing the operational conditions within a roadway traffic system and is generally described in terms of such factors as speed, travel time/delay, freedom to maneuver, comfort and convenience, safety, and percentage of truck traffic. Concurrency projects consist of roads and corridors needing action or improvement to meet the required V/S ratio within six years from time they first failed concurrency....

“While specific spot locations may not meet preferred V/S ratio, they may still meet the established concurrency standards. A capacity project will generally add additional lanes or widen a roadway. A capacity project may also prevent concurrency failure. The priorities of

the projects are based on V/S ratio; date of concurrency failure; percentage of funding; and type of funding.”

c) **Pierce County should fulfill its transportation concurrency obligations.**

The Coalition is concerned that instead of fulfilling its concurrency obligations, Pierce County is currently pursuing policies promoted by the PSRC through Resolution R2016-79s to compromise the Transportation Service Standards and simply accept the premise that high degrees of dangerous traffic congestion are acceptable. Specifically, the following excerpts from Pierce County’s *Transportation Concurrency Management System 2015 Annual Report* form an additional basis for the Coalitions' concern that Pierce County may be attempting to sidestep its transportation concurrency obligations (emphasis added):

“It is the County’s intent to address concurrency deficiencies primarily through the completion of arterial capacity improvements. The County has completed, or is in the process of constructing, various capacity improvements on several key corridors to address past concurrency deficiencies since the introduction of new concurrency methodology and measurement in 2006. It has improved overall mobility and reduced road congestion on the County maintained arterial system.

“Pierce County is actively involved in identifying and meeting the financial commitments necessary to correct the concurrency deficiencies within the required six year time period. Implementation of the Pierce County Traffic Impact Fee Program, which began in January 2007, is a key financial resource in meeting these commitments. However, the shortfall of construction funding in recent years creates challenges to address road congestion problems and other transportation needs. The limited financial options require the County to consider or explore new measurement methods and alternative solutions to concurrency violations.

“One or more of the following options could be considered as alternatives to the current method of addressing concurrency regulations.

“Prohibit/Phase Development Activities - One option for addressing concurrency deficiencies and failures would be to declare a development moratorium or limiting/phasing new development applications in all or part of Pierce County until required capacity improvements can be completed. This option will have very limited impact due to the existing residential pipeline lots and/or plats that could supply enough housing units to meet the future demand of new housing growth in the next 5-10 years, with many having vested development rights.

“Revise Service Standard - Revising the Service Standard would require increasing the allowable daily V/S for identified segments as part of the Comprehensive Plan amendment process. The Service Standard could also be varied in different areas of the County, for a single arterial corridor, or even for a specific roadway segment to allow greater congestion under special considerations. It is also conceivable that certain roadways could be exempted from concurrency altogether, allowing any V/S ratio to exist. However, some of these options would be unpopular to the public since they will greatly reduce the motility on these facilities.

“Revise Service Thresholds - Another option that the County Council could pursue would be to revise the Service Thresholds. Any revisions to the Service Thresholds (shown in Table 2-1) would likely involve using new guidelines and/or professional judgment to modify one or more of data inputs that go into the calculation of the thresholds.

“The fact that current thresholds are resulting in a number of daily V/S ratios at or above 1.2 implies that the thresholds may be too low for certain County arterials.

“Ultimate Capacity - “Ultimate Capacity” designation of a corridor is a growth management tool that allows for a higher service threshold for identified corridors. It attempts to mitigate congestion by facilitating higher density development to support multimodal transportation without triggering concurrency restrictions on development. It occurs when the county council determines that excessive expenditure of public funds is not warranted for the purpose of making further improvements on certain arterials. However, feasible alternatives must be provided as means to mitigate the congestion on the designated corridor.

## 5. CONCLUSION

Pierce County’s current TCMS identifies several concurrency deficiencies in both base and future years. The County has completed, or is in the process of constructing, various capacity improvements on several key corridors to address past concurrency deficiencies. All current concurrency failures for roadways in 2015 have been addressed except Spanaway Loop Rd S. The focus of next year’s concurrency management will likely shift to addressing those County arterials that will have projected daily V/S ratios over the Service Standard within the six year period. In response, the County Council may, in the coming years ahead, need to consider alternative actions, such as those outlined in this report, to address newly failing roadway segments in the future”.

### **d) The identified alternatives to concurrency obligations are inadequate.**

Pierce County should not sidestep its transportation concurrency obligations by planning for non-compliance with concurrency regulations. Specifically, the "Revise Service Standard" alternative presented above would simply increase the allowable daily V/S for identified arterial roadway segments and thereby exempt certain roadways from concurrency altogether. As the 2017-2022 Transportation Improvement Program admits, however, these options "would be unpopular to the public since they will greatly reduce the motility on these facilities." The "Revise Service Threshold" alternative appears to be a sleight-of-hand approach to pursue new guidelines to modify one or more of data inputs that go into the calculation of the thresholds. This alternative would allow any congestion issue to be mathematically removed from the list by manipulation of the forecaster’s “black box,” often referred to as, “garbage in – garbage out.” The "Ultimate Capacity" alternative appears to suggest that buses could be used to reduce traffic congestion and thereby allow higher density development "without triggering concurrency restrictions on development."

It is recommended that Pierce County honor its obligation to require transportation concurrency as presented below. It may be important to first discuss some of the probable consequences of failing to require transportation concurrency.

**e) Consequences of failing to require transportation concurrency.**

There are many arterial roads within the subject UGA that are not currently developed to proper storm water, roadway structural, or multi-modal standards. This does not include the many non-arterial roads which fail to meet urban road standards in a variety of ways. Many examples of traffic congestion and safety issues exist within the subject UGA which are not even monitored by the current Transportation Concurrency Management System.

Additionally, many of the deficient county roads are not even scheduled on the County's six-year plan for road improvement and the costs of required road improvements are not within the County's current financial resources.

The probable consequences of deficient, unsafe, and non-concurrent County roads include public safety, related liability issues, traffic congestion, public inconvenience, economic impact to area businesses, loss of property values, and loss of community livability. Any effort to water down the Transportation Service Standards by creating a new measurement system, or otherwise ignoring or exempting congestion in the subject UGA, will only increase these identified consequences. Compounding the consequences of increased traffic congestion and decreased concurrency compliance is the R2016-79s initiative to simultaneously increase UGA development densities, stacking people together like cord wood, without providing an effective and safe transportation system. Further compounding these identified consequences is the proposed dismantling of Pierce County's tax and urban service base through annexation or incorporation. It is difficult to imagine why any abutting cities would want to annex these challenges, and what set of knowledgeable citizens would want to take on the plethora of problems by incorporating yet another body of government.

The compounding effect of increased densities, increased traffic, decreased concurrency standards, and loss of Pierce County's tax and service base would dramatically impact traffic mobility within the subject UGA. Under the proposed R2016-79s initiative, the subject UGA consisting of South Hill, Fredrickson, Parkland, Spanaway, Midland, and Summit View would be potentially built-out with residential structures packed as few as six feet apart. This densified urban mass would be surrounded by multi-family and commercial development which would line Pacific Avenue, 176th Street, Canyon Road, and 112th Street. While the R2016-79s initiative has proposed to pack as many people per acre as physically possible, it has done little to address transportation other than to propose a possible decrease in transportation concurrency standards. The probable result of the R2016-79s initiative would be an overbuilt urban mass which provides an inadequate transportation system for citizens to gain safe and efficient access to and from their homes and area businesses. How to best define and provide transportation concurrency to accommodate growth within the subject UGA must be carefully evaluated by Pierce County citizens and their elected representatives.

**f) Recommended development densities and transportation concurrency standards.**

The development densities and transportation concurrency standards envisioned in the R2016-79s initiative appear inadequate to provide safe and efficient transportation within the

existing, future, and fully "built-out" UGA. It is recommended that Pierce County realize that the subject UGA will eventually be built out to "full capacity" and that the UGA should, therefore, be planned to become a "livable living environment," rather than an attempt to socially engineer people into over-densified small lots. Reasonably sized lots should provide enough lot room for efficient transportation flow, off-street parking, several trees, and a useable lawn area. To this end, the development densities envisioned in R2016-79s, or the so-called "City of Pierce" initiative should be reduced by 50%. Rather than trying to force ten houses per acre, the density of single family residential structures should be limited to 5 houses per acre. In addition, development should remain concurrent with transportation and other urban infrastructure as required by law. Pierce County should not invent or endorse sleight-of-hand concurrency alternatives to reduce transportation concurrency standards which the County's 2015 TCMS report admits would be "unpopular to the public." As provided in the 2015 TCMS report, Pierce County should instead "limit / phase new development applications in all or part of Pierce County until required capacity improvements can be completed." Moreover, in an effort to help ensure that development remains concurrent with transportation, Pierce County should not defer, but properly pursue and collect incurred development and traffic impact fees. Most importantly, Pierce County should not reduce its tax and urban service base to the detriment of unincorporated areas and small cities through ill-advised annexations or incorporations. Pierce County should follow its own recommendation to "modify the land use element to bring development into balance with available or affordable facilities."<sup>1</sup>

#### **4. Concurrency Related to Sanitary Sewers and the Sole-Source Aquifer**

Pierce County citizens residing in Central Pierce County live on a Sole Source Aquifer and that aquifer is their primary source of drinking water. In the last few years, water contamination issues have caused the use of water to be considered a "must protect" commodity. Local examples of water contamination include the Parkland area where continued growth has contaminated surface and ground water. For example, the water well on "A" Street has required a deeper shaft due to contamination from surrounding dense developments. While the aquifer recharges from rain water, the ability of the land covered with dense structures built on compacted soils tend not to percolate, but instead runoff into the streets and into the pathogen breeding holding ponds that all developments must have. The impacts are much like those associated with deforestation. The storm water that does percolate down to the aquifer often carries potential pathogens as well.

Despite the public's concern regarding loss of their primary source of drinking water, the Director of PALS has publicly advocated creating as many developable lots as fast possible through increased development densities *without* permanent sewer utilities. The Coalition's concern regarding the Director's proposal to achieve rapid densification through so-called "temporary" community septic drain fields, rather than concurrent sanitary sewers, appears well founded. Specifically, the 2010 Pierce County Unified Sewer Plan, Issue 6, provides the

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<sup>1</sup> September 2016 Capital Facilities Plan Summary, Exhibit "B" to Pierce County Ordinance No: 2015-56, beginning at page 1

following conclusions related to Ground Water Quality and Sewerage Facilities (emphasis added):

“Groundwater serves as the primary source of drinking water for Pierce County. Protection of this resource is vital. Impacts to groundwater recharge, groundwater migration and groundwater contamination all require careful consideration in the design and installation of sewerage facilities....

“Contamination of the aquifers (groundwater) can occur through a number of sources, including failing septic systems....

“Sanitary sewers within urban areas continue to be the most effective way to control groundwater pollution due to overly dense septic systems. The variability in the geology/soils makes it difficult to determine on a large scale, if groundwater migration is an impact of the installation of underground facilities. The impact is a matter of research and project-specific environmental analysis.”

The Final Draft 2016 Pierce County Public Works Sewer Improvement Program for 2017-2037 further provides the following conclusions related to the Sole Source Aquifer and Comprehensive Plan requirements at Chapter 2-5 (emphasis added):

“Much of Pierce County’s Urban Growth Area is located above a sole source aquifer. The installation of sewers and the continued decommissioning of individual septic systems in the urban zoned areas of the County aid in protecting this valuable resource....

“Pierce County requires the use of sewers in the County’s urban growth and urban zoned areas. To this end, collection system expansion is primarily accomplished by new development paying for the construction of new lines and connections....

“The Sewer Improvement Program is utilized for a 20-year planning cycle and is instrumental in securing long term funding and providing a dynamic platform for adjustment and revision to the Capital Facilities Plan to best take advantage of new technologies and favorable construction opportunities.”

Pierce County officials and elected representatives should carefully review the Tacoma / Pierce County Health Department's publication entitled *Central Pierce County Sole Source Aquifer* before any making policy decisions that may potentially impact the citizens' primary source of drinking water. More specifically, the following are selected excerpts from the 1993 publication of the U.S. Environmental Protection Agency related to the Central Pierce County Aquifer System (emphasis added):

“The EPA Regional Administrator has determined that the Central Pierce County Aquifer System is the principal drinking water source for the area, and which, if contaminated, would create a significant hazard to public health. Based on the information available to this Agency, the Regional Administrator has made the following findings which are the bases for the determination noted above:

- 1) The Central Pierce County Aquifer System supplies approximately 60 percent of the average drinking water demand for the area, and approximately 84 percent of the peak drinking water demand for the area.
- 2) No alternative source or combination of sources can physically, legally, and economically supply all those who depend upon the aquifer system for drinking water.
- 3) Based upon these two findings, contamination of the Central Pierce County Aquifer System would create a significant hazard to public health.

“The potential for contamination is greatest where sediments are permeable, recharge is high, and ground water is shallow. The relative vulnerability of ground water to contamination also increases from various human activities which provide the opportunity for anthropogenic sources of contamination to enter the system. Subsurface disposal of waste and wastewater is the chief threat to ground water quality over much of the aquifer system. The Tacoma-Pierce County Health Department has identified individual and community septic systems, the subsurface disposal of urban stormwater, and solid waste landfills as principal concerns.”

Pierce County's Sole Source of drinking water is so vital that the County entered into a contract with EPA to protect and preserve the identified Sole Source Aquifer. It is my understanding that a copy of the Pierce County / Federal EPA contract will soon be forwarded to Pierce County under separate cover.

An acceptable sanitary sewer concept for the subject UGA has yet to be built or planned that would capable of supporting the level of development densities presently proposed under the "City of Pierce" initiative as envisioned by R2016-79s. Moreover, the sewer infrastructure to properly support a healthy environment under current zoning and population density projections is at best struggling. It is recommended, therefore, that Pierce County fully evaluate the Director's planned failure to provide concurrent sanitary sewers as well as the potential impacts to the area's source of drinking water caused by increased development densification on community septic systems. It is also recommended that Pierce County review and comply with its EPA contract. Pierce County should also comply with State law that requires "concurrency" between urban development and urban infrastructure such as sanitary sewers. In this manner, Pierce County's elected representatives will have complied with their legal obligations and have done everything possible to protect and preserve the citizen's primary source of drinking water while still allowing a reasonable development densities to occur.

## **5. PSRC Certification Recommendations**

Coalition members have expressed concern that certain elected representatives are voluntarily allowing the PSRC, an unelected body, to usurp Pierce County's authority and determine land use planning standards, policy, and procedures for Pierce County citizens. Coalition members have also expressed concern that Pierce County is being manipulated into sidestepping State and regional policies related to "concurrency" of essential public services such as road and sewer systems. The Coalition believes that the PSRC is attempting to consolidate regional power without authority and advance a misreading of the State GMA to "bend the trend" in a direction that will result in adverse consequences to Pierce County and the small cities as discussed below.

Pierce County received approval for the County's updated 2015 comprehensive plan by the PSRC Executive Board and which included PSRC staff recommended conditions as follows:

"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 multi-county planning policies and the regional transportation plan.

"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."

In an effort to address bullet three (3) of the recommended PSRC approval conditions above, the Pierce County Council pursued consideration of R2016-79s. During the public process for R2016-79s, County staff offered the Council potential consequences of not abiding by the PSRC conditions. Included in the staff presentation entitled *Resolution No. R2016-79 Affiliation, Annexation, and Incorporation of the Urban Growth Area*, was the following list of items, which, when taken at face value, are somewhat misleading in form:

- Out of compliance with state law.
- No longer eligible for PSRC managed federal transportation funding.
- Comprehensive Plan at risk of challenge to Growth Management Hearing Board which affects other non-transportation funding eligibility.

Apparently, several Pierce County officials have succumbed to the perceived fear that they will lose federal transportation funding if the Pierce County Comprehensive Plan fails to obtain certification by the PSRC. This perceived fear has apparently caused County officials to embark on a Comprehensive Plan "Update" to encourage the "affiliation, annexation, and incorporation of unincorporated urban areas." It must be again emphasized, however, that the PSRC conditions do not require or mandate that the County agree with the concept of affiliation, annexation, and incorporation of the UGA, but rather simply outline an intent and schedule to work with the surrounding cities to discuss these various topics. While the work

program opens the dialogue between the County and the cities on these topics, it has unfortunately failed to include the public as a party to that conversation. It is recommended that before moving forward, Pierce County first determine whether Pierce County land use decisions are within the authority of the Pierce County Council, or the PSRC, an unelected body.

## **6. State Growth Management Act**

The State Growth Management Act does not mandate annexations and incorporations of unincorporated areas as envisioned and promoted by Resolution No. R2016-79s. Specifically, the State GMA generally prefers cities as Urban Service Providers as outlined in RCW 36.70A.110, which states in part (emphasis added):

“(4) In general, cities are the units of local government most appropriate to provide urban governmental services.”

It is noted that the RCW 36.70A.110 language “In general” does not mandate that cities be the exclusive urban services providers and, therefore, it is apparent and logical that, when appropriate, counties can and might be better at providing necessary urban services such as roads, sewers, and related infrastructure.

Further consideration of this City versus County philosophy is outlined in RCW 36.70A.210, Countywide Planning Policies, which states in part:

“(1) The legislature recognizes that counties are regional governments within their boundaries, and cities are primary providers of urban governmental services within urban growth areas.”

However, the RCW further states (emphasis added):

“This framework shall ensure that city and county comprehensive plans are consistent as required in RCW 36.70A.100.”

While a base assumption exists that cities are the primary providers of urban services, it is also apparent that counties can and should be the primary urban services provider under appropriate conditions and that these conditions should be recognized in the associated plans to ensure that city and county comprehensive plans are consistent with one another.

To further push this urban City versus rural County philosophy in providing urban services, PSRC’s VISION 2040 assumes that by 2040 all of the urban area will be located within municipalities and that the unincorporated urban growth area will be a thing of the past. VISION 2040 states (emphasis added):

“Goal: All unincorporated lands within the urban growth area will either annex into existing cities or incorporate as new cities.”

A reality check would clearly indicate that this “Goal” or “Vision” is not a mandate and is not achievable given the current state laws allowing annexation and incorporation. Moreover, while it may be the desire of PSRC, this “Goal” or “Vision” presents real probable adverse consequences to Pierce County and the small cities as previously demonstrated. Finally, VISION 2040 is a creation of the PSRC and, as will be demonstrated by separate legal opinion, does not supersede the Pierce County Council's authority on issues related to Community Planning.

History demonstrates that the purely urban cities of this nation are struggling to provide an affordable quality of life and that growth, an apparent inevitability, is not well served by having more and more people living and working in densely populated service centers with the astronomical cost of providing the basic living environment. The lesson learned from our history and development to date should be, “How do we best accommodate the desired quality and function of life’s desired verities at an affordable cost?” rather than, “How do we socially engineer the citizens into believing that their governance knows what is best for them relative to choices in community environments and standards of living?” This topic should be the central dialogue during the implementation of the work program associated with Resolution R2016-79s, if that work program is allowed to continue.

## **7. Bending the Trend**

The PSRC vision "Bending the Trend" should be more carefully examined as to its probable consequences to Pierce County citizens. Simply expressed, the concept "Bending the Trend" means to change the anticipated path of progression from an existing scenario to something radically different. As presented by the PALS Director, "Bending the Trend" apparently means to advance a policy that will direct more growth into Cities and Towns, sooner rather than later, with extreme densification, without concurrency, and through the process of annexation and incorporation. As previously demonstrated, this trend, if continued, will most probably lead to adverse consequences for Pierce County and the small cities.

Vision 2040 does not force Pierce County elected officials to comply with any specific PSRC vision that would result in adverse consequences to its citizens. According to the PSRC, Vision 2040 outlines a regional strategy for accommodating the additional growth within the Puget Sound region by 2040. Vision 2040 claims to be an integrated, long-range vision for maintaining a healthy region – promoting the well-being of people and communities, economic vitality, and a healthy environment. The concept of people, prosperity, and planet provides a central theme for Vision 2040. The Vision 2040 concept, therefore, suggests that Pierce County elected officials should use an approach that takes into consideration social, cultural, economic, community, and environmental benefits when making decisions. The initiative envisioned by R2016-79s, however, appears to move the county in a direction that will most probably result in the antithesis of a livable, healthy, and sustainable community through worsening traffic congestion, and inadequate roads, sewers, and related urban infrastructure.

During the past several years, Pierce County has been advancing the PSRC vision as summarized below with apparently little consideration to the probable consequences of its actions. Specifically, Technical Appendix II-B of Vision 2040 offers guidance relative to aligning county and city growth targets with the Regional Growth Strategy prescribed in Vision 2040. The guidance includes the potential challenges faced by local governments in realigning historical growth patterns to newly established projections. The PSRC claims it will remain flexible by recognizing good faith efforts by cities and counties during their review of growth targets and comprehensive plans. To accommodate the PSRC's desires for social change, local governing bodies are requested to outline what actions they are taking to more aggressively "bend the trend" of recent growth to align with the concepts in VISION 2040.

Consistent with the guidance provided by Technical Appendix II-B, Pierce County specified potential strategies for "bending the trend" when it adopted the 2030 growth targets pursuant to Ordinance No. 2011-36s. These growth targets were acknowledged and accepted by PSRC and were utilized in the development of the 2015 Comprehensive Plan Update. PSRC has since requested Pierce County to provide additional information regarding implementation of "bend the trend" strategies set forth in Ordinance No. 2011-36s.

Pierce County has been actively working to affiliate the unincorporated urban area with adjacent cities consistent with Vision 2040. Pierce County has advocated for the inclusion of policies supporting and establishing an affiliation process. These policies were subsequently ratified by Pierce County and its cities, and certified by the PSRC in 2012. The 2015 Comprehensive Plan Update contains policies that supports affiliation through the establishment of Potential Annexation Areas (PAA) and addresses annexation.

Pierce County has also sought legislation at the state level to reform annexation law in order to facilitate the transfer of unincorporated urban areas to cities. The most recent annexation reform effort resulted in the Washington State Legislature considering House Bill 2112 during its 2015 regular session. While this bill was not adopted, Pierce County continues to work with its government affairs staff and legislative delegation to secure annexation reform.

It is recommended that County elected representatives reevaluate Pierce County's current trend or trajectory, its probable consequences, and move the county in a direction that will result in a more livable, healthy, and sustainable community.

## **Conclusion**

In light of the existing and projected road, sewer, and water supply deficiencies identified above, the Coalition questions the wisdom of intentionally concentrating increased urban densities into the identified UGA without providing concurrent road, sewer, and water related improvements which are necessary to support the public's health and safety. The Coalition's concern is focused upon the proposals manifest in Exhibit "A" of County Council Resolution R2016 – 79s, which provides a work program and schedule for proposed annexations and incorporations within the identified Urban Growth Area. Although Resolution R2016 – 79s

encourages rapid urban development within the identified UGA, it does little to ensure that roads, sewers and water supply remain concurrent with the increased development densities being promoted by the PSRC social engineers of the region. More importantly it does not provided for a public opportunity to engage in the crafting of the policies and strategies necessary to evaluate, process, and complete the work program.

Based upon my review and evaluation, it is my opinion that Pierce County needs to carefully engage the public while deliberating the implementation of the work program associated with Resolution R2016-79s. On behalf of the Pierce Communities Coalition, I strongly recommend that the public be included as a cornerstone “participant” (which are noticeably absent) to those already identified on page 11 of Dennis Hanberg's PowerPoint presentation provided on August 2, 2016, **Attachment “D.”** I would further recommend that the public process be in a manner and depth that was employed during the development of the 1992 Transportation Plan, which was truly an engagement of the County’s citizens in an open and comprehensive dialogue of the topic at hand, allowing the people to seek their desired pathway to the future.

Please feel free to contact me at the number and/or addresses below if you have questions. On behalf of the Pierce Communities Coalition, I thank you again for your attention and consideration to this matter.

Sincerely,



Thomas G. Ballard, P.E.  
Principal

cc: Dan Roach, Councilmember District 1  
Pam Roach, Councilmember District 2  
Jim McCune, Councilmember District 3  
Connie Ladenburg, Councilmember District 4  
Rick Talbert, Councilmember District 5  
Derek Young, Councilmember District 7  
Pierce Communities Coalition  
TBA file 16-12

ATTACHMENT "A"

1 Sponsored by: Councilmember Derek Young  
2 Requested by: County Council  
3  
4  
5

6 **RESOLUTION NO. R2016-79s**  
7  
8

9 **A Resolution of the Pierce County Council Related to Comprehensive Plan**  
10 **Certification by the Puget Sound Regional Council (PSRC);**  
11 **Expressing County Intent and Deadlines Regarding Efforts to**  
12 **Encourage Annexation and Incorporation of Unincorporated**  
13 **Urban Areas; and Finding Pierce County has Satisfied a**  
14 **Condition of PSRC Certification.**  
15

16 **Whereas**, Pierce County's 2015 Comprehensive Plan Update received  
17 conditional certification from the PSRC on April 28, 2016; and  
18

19 **Whereas**, as part of the certification review, Pierce County provided information  
20 to the PSRC regarding Pierce County's efforts to: (1) encourage the affiliation of urban  
21 unincorporated lands with adjacent cities and eventual annexation of these affiliated  
22 areas by the cities, and (2) to identify unaffiliated urban unincorporated lands which are  
23 expected to incorporate in the future; and  
24

25 **Whereas**, the information was summarized in Pierce County Resolution  
26 No. R2016-31; and  
27

28 **Whereas**, the third condition of PSRC's conditional certification requires that  
29 "[t]he Pierce County Council will, no later than June 2016, pass a resolution stating their  
30 intent and deadlines to work with surrounding cities regarding annexation and  
31 incorporation;" **Now Therefore**,  
32

33 **BE IT RESOLVED by the Council of Pierce County:**  
34

35 Section 1. The Pierce County Council hereby states that it is Pierce County's  
36 intent to encourage affiliation of unincorporated urban areas to existing cities where  
37 appropriate and consistent with the Pierce County Countywide Planning Policies and  
38 the policies of the Pierce County Comprehensive Plan, to support annexation of said  
39 lands when consistent with the Pierce County Countywide Planning Policies and the  
40 policies of the Pierce County Comprehensive Plan, and to support the incorporation of  
41 unaffiliated unincorporated urban areas where consistent with the Pierce County  
42 Countywide Planning Policies and the policies of the Pierce County Comprehensive

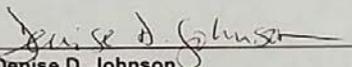
1 Plan. In furtherance of this stated intent, the Council hereby adopts a work program  
2 identifying actions to be taken and a schedule for said actions. This work program and  
3 schedule is set forth in Exhibit A, which is attached hereto and incorporated herein by  
4 reference.

5  
6 Section 2. The Pierce County Council hereby finds that the statement of intent  
7 set forth in above Section 1. and the work program and schedule set forth in Exhibit A  
8 satisfy the third condition set forth in the PSRC Condition Certification dated April 28,  
9 2016.

10  
11  
12 ADOPTED this 28<sup>th</sup> day of June, 2016.

13  
14 ATTEST:

PIERCE COUNTY COUNCIL  
Pierce County, Washington

15  
16  
17   
18 Denise D. Johnson  
19 Denise D. Johnson  
20 Clerk of the Council

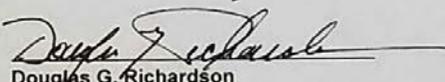
  
21 Douglas G. Richardson  
22 Douglas G. Richardson  
Council Chair

Exhibit A to Resolution No. R2016-79s

**Pierce County Work Program and Schedule – Affiliation, Annexation, and Incorporation**

Pierce County is actively working to encourage the affiliation, annexation, and incorporation of unincorporated urban areas consistent with Vision 2040, Pierce County Countywide Planning Policies (CPPs) and policies contained in the Pierce County Comprehensive Plan. In furtherance of this work, Pierce County has established the following work program and schedule:

Task	Description	Participants	Est. Completion Date
<b>Inventory and Characterize Potential Annexation Areas</b>	Prepare an inventory of all potential annexation areas and a profile for each. Profile will include basic information including boundary, land area, parcel count, land use characteristics, population estimates, utility/service providers, assessed valuation, and likely annexation city.	Pierce County	December 1, 2016
<b>Affiliation/Annexation Conversations and Joint Planning Agreement Exploration</b>	Initiate conversations with cities and towns regarding affiliation/annexation of unincorporated urban areas, document any identified barriers to annexation, pursue the development of JPAs where feasible, and formally affiliate areas through the process set forth in the CPPs. Technical support from PSRC will be sought as needed.	As of June 1, 2016, initial contacts have been made with the following cities: Tacoma, Puyallup, Bonney Lake, Gig Harbor, and Fircrest. This participant list will be expanded in the future based upon city interest and staff and funding availability.	Will vary by city and is dependent upon city participation. Initial conversations with select cities and towns have begun. County goal is to complete these initial conversations no later than July 1, 2017.
<b>Annexation Support - Sales and Use Tax Tool</b>	Request the Washington State Legislature to modify provisions contained within RCW 82.14 to make the sales and use tax tool more viable for cities in Pierce County.	Pierce County, Pierce County Regional Council, Puget Sound Regional Council, State Legislature	Pierce County has initiated conversations on this topic with select legislative offices and has begun briefing legislative staff. The County will bring a proposal to the PCRC and PSRC for briefing and discussion by October 1, 2016. State

Task	Description	Participants	Est. Completion Date
<b>Annexation Reform - Island Annexation</b>	Request the Washington State Legislature to modify provisions contained within RCW 35.13 to promote timely and certain annexation of unincorporated urban islands surrounded by cities.	Pierce County, Pierce County Regional Council, Puget Sound Regional Council, State Legislature	legislative action desired in 2017. Pierce County has initiated conversations on this topic with select legislative offices and has begun briefing legislative staff. The County will bring a proposal to the PCRC and PSRC for briefing and discussion by October 1, 2016. State legislative action desired in 2017.
<b>Affiliation Application Procedures</b>	Review Pierce County's fee structure for comprehensive plan amendments proposing affiliation of the existing Urban Growth Area. Consider reducing fees as an incentive to encourage affiliation.	Pierce County	August 1, 2017
<b>Urban Subarea Plan Updates</b>	Update of Pierce County's core urban subarea plans (Parkland, Spanaway, Midland, South Hill, and Frederickson). Update process will include discussions with citizens regarding future annexation or incorporation of urban areas.	Pierce County, unincorporated residents	Urban subarea update process has begun and is on-going. Update process is anticipated to be complete by December 1, 2017.
<b>Request City Annexation of Unincorporated Islands</b>	Pierce County will take formal legislative action to request that select cities annex certain unincorporated urban islands following the procedures set forth in RCW 35.13.470 and .480.	Pierce County and select cities and towns	Pierce County will adopt first legislation no later than July 1, 2017. Annexation itself dependent upon action by city.
<b>Review Future Incorporation Areas</b>	Review future incorporation areas in preparation for designating and mapping these areas during the 2018 Pierce County Comprehensive Plan Update.	Pierce County	Preliminary review of incorporation areas will occur through the Urban Subarea Plan updates and will be completed by December 1, 2017.

<b>Activity Report to PSRC Growth Management Policy Board</b>	Prepare report required by PSRC conditional certification of Pierce County Comprehensive Plan and submit to Growth Management Policy Board.	Pierce County	December 15, 2017
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Exhibit A to Resolution No. R2016-79s  
Page 3 of 3

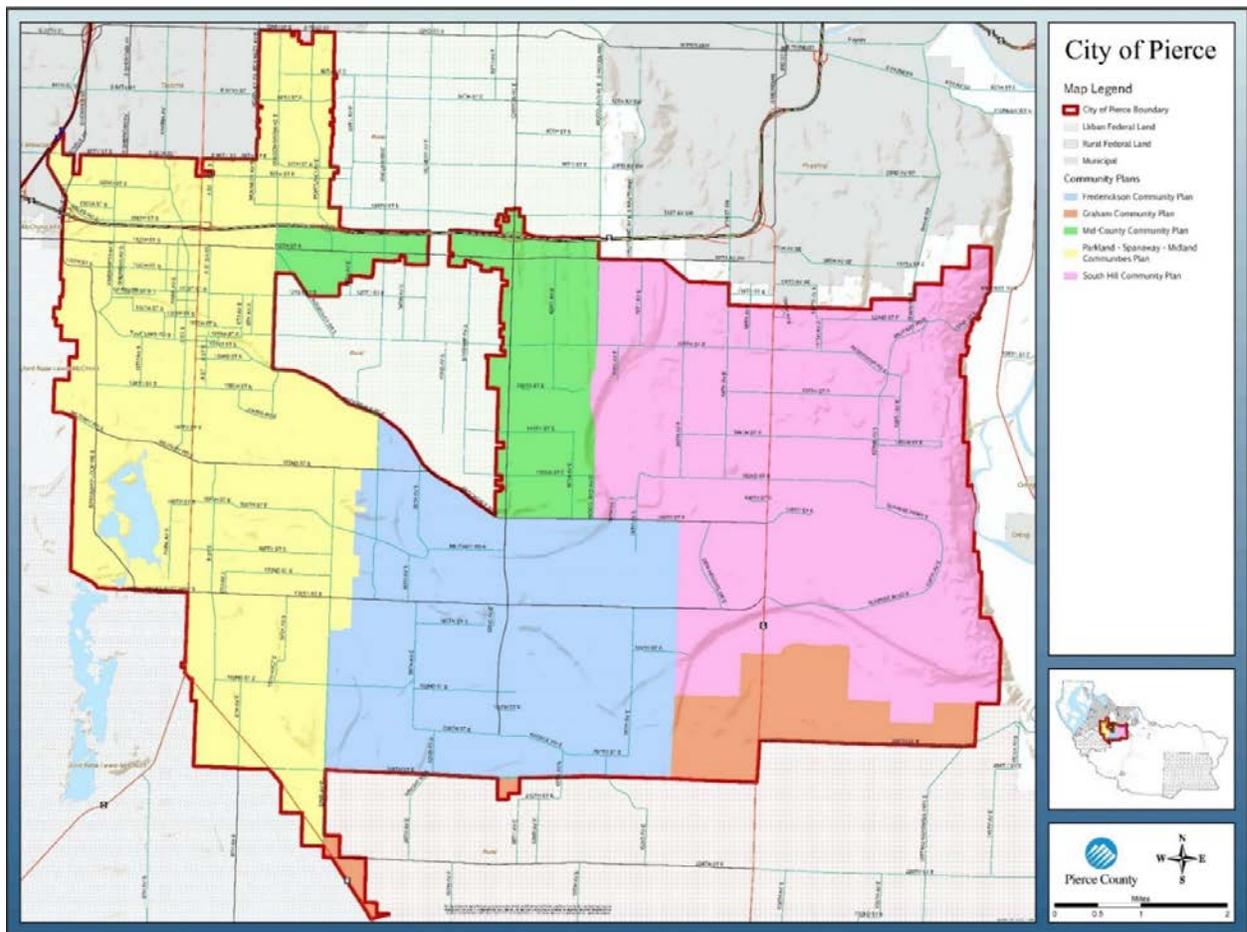
Pierce County Council  
800 Tacoma Ave. S., Rm. 1046  
Tacoma, WA 98402



## ATTACHMENT "B"

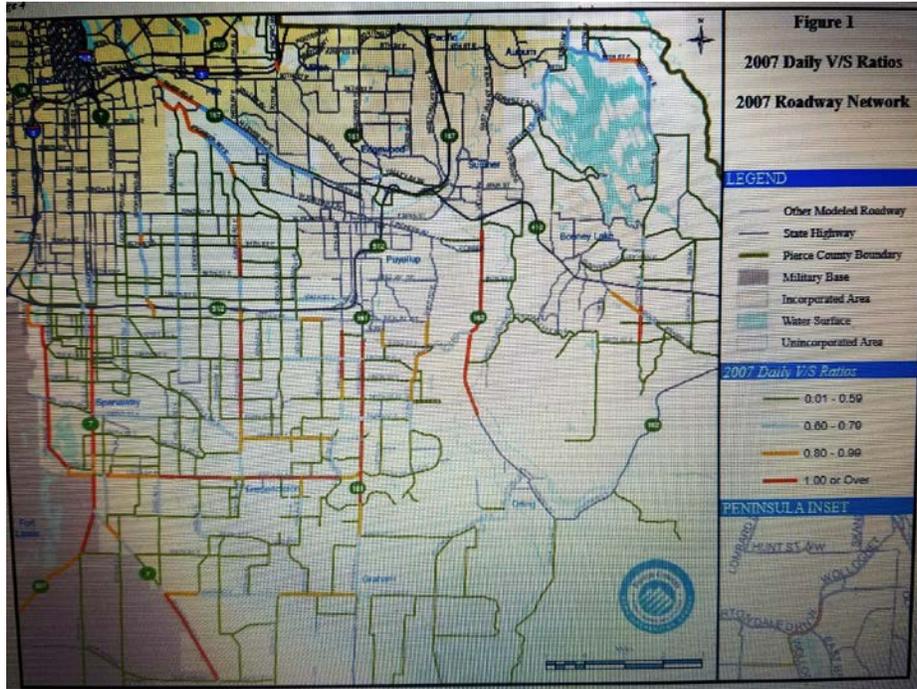
### City of Pierce Initiative

- Focus on the Central Pierce County Urban Growth Area
- Encompasses the *urban* areas of 5 community plans
- Contains 3 major N/S and 2 major E/W transportation corridors

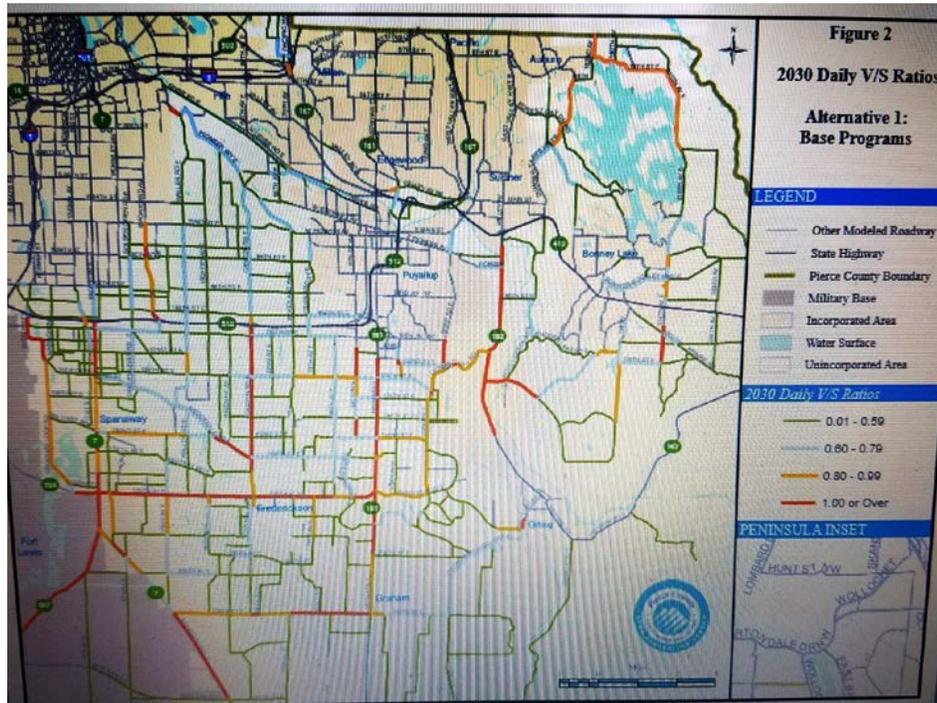


ATTACHMENT "C"

2007 Concurrency Daily Traffic Volumes v. Road Capacity



2030 Concurrency Daily Traffic Volumes v. Road Capacity



ATTACHMENT "D"

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The following is taken from the August 2, 2016 public information meeting presentation:



Dennis Hanberg, Planning & Land Services Director  
Public Information Meeting  
August 2, 2016

Page 11:

## PARTICIPATION

- Executives Office
- Councils Office
- PALS
- Public Works
  - Sewer
  - SWM
  - Traffic
- Parks
- Health Department
- Sheriff Department
- Economic Development

