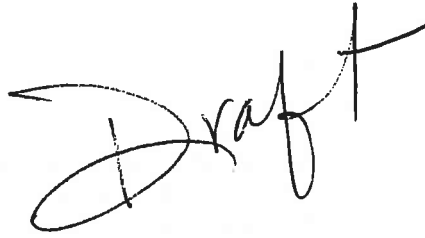


May 21, 2009

The Honorable Roger Bush, Chair
Pierce County Council
930 Tacoma Avenue South, Rm. 1046
Tacoma, WA 98402-2176



Dear Chair Bush,

RE: Proposed 2009 Amendments to the Pierce County Comprehensive Plan

On behalf of the Tacoma City Council I wish to express our concerns regarding proposed amendments to expand opportunities to site industrial development within the rural areas of the County (Application T-1/C-1-Barriers to UGA Expansion for Warehouse, Distribution and Freight Movement Uses). Our comments are as follows:

The City of Tacoma questions this proposal to amend policies in the County's Comprehensive Plan and Community Plans before a formal consultation with cities and towns has occurred. We are not necessarily opposed to developing a process for the County to site Major Industrial Developments outside of Urban Growth Areas as allowed by the Growth Management Act (GMA) but strongly believe that before policy revisions are considered the consultation process as required by GMA needs to occur.

We suggest that the proposed new policy listed in the application should be revised to include the expanded language called for by RCW 36.70A.365 to clearly acknowledge this essential component of the siting process as follows:

19A.30.150 Industry

NEW C. Major Industrial Developments. Establish a process, in consultation with cities and towns consistent with provisions of RCW 36.70A.210, for reviewing and approving proposals to authorize siting of specific Major Industrial Developments outside urban growth areas pursuant to RCW 36.70A.365.

The GMA provision to site major industrial development developments lays out many requirements that must be met before an industrial development can be sited in a rural area. All of these requirements have policy implications for both the County and municipalities. The T-1/C-1 application provides examples of some policy amendments that the County Council has identified as needed but indicates that other policy revisions as yet unidentified could be added. Until these other policy amendments are provided for our review, it is impossible to respond to the entire application.

As to the policy revisions that are included in the application as "examples", further explanation is needed in regards to the specific need for the proposed changes to the Agricultural Resource Lands de-designation process and to the no net loss of Rural Separator lands. The Rural Separator and Agricultural Resource lands are some of the most protected areas in the rural areas of the County. If the purpose of these policy amendments is to site major industrial developments, it would seem that other parts of rural lands may be more appropriate for UGA expansion. As proposed, these policy revisions would impact far more than the siting of warehouse and distribution facilities and would open up the affected areas for other types of inappropriate uses without the controls that are currently in place with the current policies.

It seems premature to propose several policy amendments without a full discussion among the cities and towns and the County of the perceived need for these amendments and the significant implications of the revisions as proposed.

We acknowledge that the application calls for County planning staff to work "... collaboratively with Cities and Towns ... in an effort to remove barriers to Urban Growth Area expansion for the purpose of economic development, consistent with the Growth Management Act". However, this collaborative effort has not occurred. Further, parts of the proposed policy revisions are directly at odds with the proposed "T-6 Amendment-Adopt Review Criteria for UGA Expansions"; an amendment that was developed collaboratively over a period of months with cities and towns and other interested parties.

In the background information provided to support the need to amend the Comprehensive Plan and Community Plans prior to the collaborative consultation process are some broad statements that are not backed up. We require additional information or clarification before we can adequately respond to the need for this amendment to proceed at this time. We request a copy of any studies that demonstrate the Port of Tacoma's claim that "adequate lands are not available in Pierce County to accommodate the demand for warehouse and distribution facilities needed for future growth". We are unaware that such a review has occurred and that these findings are supported.

In Tacoma, we recently designated 400⁺ acres of the City as a manufacturing/ industrial center and placed restrictions on lands within the center to reserve the area for industrial uses. We would like to know if this center was included in the analysis of available industrial lands.

We also are interested in knowing the "barriers for new warehouse and distribution facilities" that "cities throughout Pierce County have allegedly created". If this statement is true, then the collaborative consultation process may lead to changes in City Comprehensive Plans rather than adjusting the County's Comprehensive Plan and Community Plans for UGA expansions in rural areas. Siting warehousing in urban areas is preferable to opening up rural areas for potentially incompatible development.

Absent additional information, and absent a collaborative consultation process where these issues and others could be discussed, we must oppose the proposed T-1/C-1 amendments.

Sincerely,

Bill Baarsma
Mayor

- c. Members of the Pierce County and Tacoma City Councils
Eric Anderson, City Manager
Pat McCarthy, Pierce County Executive

Chuck Kleeberg, Director, Pierce County Planning and Land Services Department
Ryan Petty, Director, Tacoma Community and Economic Development Department