



May 2, 2017

Don Anderson  
Mayor

Growth Management Policy Board  
C/O Chair- Councilmember Ryan Mello

Jason Whalen  
Deputy Mayor

1011 Western Ave  
Seattle, WA 98104

Mary Moss  
Councilmember

Dear GMPB Chair- Councilmember Mello, Vice Chair- Councilmember Margeson and GMPB representatives:

Michael D. Brandstetter  
Councilmember

This letter is to call to your attention some significant deficiencies in the Draft Regional Centers Framework Update recently released by the Puget Sound Regional Council (PSRC) Stakeholder Committee. We are concerned with the development and future implementation of the plan, specifically, the lack of inclusion, communication and transparency, in addition to the details of the plan itself. The particulars include:

John Simpson  
Councilmember

- The proposed Centers Designation;
- The recognized industrial and manufacturing centers; and
- The Stakeholder Committee's recommendation regarding Military Centers.

Marie Barth  
Councilmember

Paul Bocchi  
Councilmember

First and foremost, although the potential ramifications of this Framework may impact Pierce County and its municipalities for years to come, until recently, our policy makers have not been included in the process, nor have we been informed as to the decisions which have been made. It is our impression that the methods used in developing this framework, in addition to an apparent lack of strategic planning, is the cause of such concern from member-cities, including Lakewood.

### Regional Framework Update

John J. Caulfield  
City Manager

Recommendations in the draft report come as a surprise to many elected officials although there has been ample time to communicate the process. According to the report, this process has been underway for well over two years dating back to early 2015. Policy-makers throughout the PSRC jurisdiction should be involved early on any process of this significance. This has not occurred.

The Regional Center Framework Update report comes across as a surprise and a "done deal," made by a group of 20 non-elected individuals. For a group comprised of four counties, one of which is the population center for the region, it is unsettling that the majority of the members of the Stakeholder Group are from King County (the regional population center). Regardless of any justification population center status grants King County, the three other counties and

the cities within them must have meaningful roles as members of the group. This means transparency, involvement, and participation by our local policy/elected leaders, citizens and businesses. While that kind of involvement takes time and effort, it is necessary to ensure the best result for the whole region.

Due to the above mentioned shortcomings, cities in our region are uncertain why the new regional center framework is being proposed. Case in point, at the April 20<sup>th</sup> Pierce County Regional Council (PCRC) meeting PSRC representatives clarified that two of the three proposed amendments were brought forth by member-cities. (1) The manufacturing and industrial centers (MIC) revisions were in response to requests from the cities of Marysville and Arlington, who want PSRC to develop a system to recognize MIC's that don't meet the existing criteria in Vision 2040. (2) Military Centers were included in the proposed update because PSRC staff had acknowledged and received feedback from member-cities that recognizing military centers should be a priority in our region. It is unclear why, in addition to the requests made by member-cities, the PSRC board requested that regional tiers also be evaluated. Unlike the MIC and military center proposals, there is no articulated reason to create new regional designations. The confusion may be caused by a lack of regional involvement in the development process, but it is also troubling that many of the standard questions asked of PSRC staff remain unanswered. Overall, the lack of transparency in the process has left room for concern, particularly regarding the impetus for these changes and how the new tiered system may impact future funding allocations.

At the April 20<sup>th</sup> meeting PSRC representatives explained that a number of cities are awaiting this update because of current gaps in Vision 2040. The current gaps in Vision 2040 can be attributed to many things, but we would argue that it is not wise to piece together updates to a regional plan without proper vetting of both existing and new policies. The City of Lakewood has asked PSRC what the goal of this update is and what the result of implementation will be, but to no avail. All strong strategic plans weigh heavily on the importance of implementation and overall goals. It is unlikely that PSRC has chosen to implement these new regional tiers without any goal in mind. However, without the ability to see how the new tiers will impact the bigger picture, or Vision 2040, it has proven difficult to adequately inform stakeholders, i.e. member-cities of the long term impacts. Given that Vision 2040 needs to be updated as a whole, it may behoove PSRC to review regional centers simultaneously.

Arguably, failure to properly set goals and a long-term implementation strategy sets the Regional Centers Framework Update up for failure. At minimum, it may lead to unintended consequences that have not been thoroughly reviewed or understood by those most greatly affected. As our Municipal Planning Organization (MPO), PSRC's responsibility is to "develop a long-range plan, coordinate transportation within the region, and prepare a transportation improvement program"<sup>1</sup>. In several ways our jurisdiction has asked "How does the new Framework Update fit in with PSRC's long-range plan?" Should it relate to the allocation of funding, then all jurisdictions must be provided with ample opportunity to submit necessary amendments to their individual planning policies and/or any newly developed plan to remain competitive in the funding process-- this has yet to happen.

Without better coordination, communication, inclusion and transparency, local control is being eroded and replaced by regional control that, thus far, has not effectively included our jurisdiction. Given this, the most responsible action for our community is to oppose the implementation of the new Regional Centers and County-Wide Center Designations. Before PSRC takes action on this proposal, given the complex and significant changes, they need to visit with locally elected officials to update them and

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<sup>1</sup> Washington State Department of Transportation. 2017. Regional Transportation Planning. Available: <http://www.wsdot.wa.gov/planning/Regional/Default.htm>. Accessed: April 25, 2017.

obtain feedback and input. Furthermore, the City of Lakewood would encourage a review of the evolution of PSRC's regulation and control. The concern is that all things are becoming transportation-related to the point that if a given member-city does not implement certain policies, which would typically fall entirely within local control, that City risks transportation funding. Local governance is critical to achieve the best results in any given community.

This proposal appears as a means to distribute limited federal transportation dollars away from communities such as Lakewood and Pierce County and reallocate dollars to Seattle and certain parts of King County. If this is not the case, the report should strongly memorialize that the allocations of federal transportation funds will not be impacted. Lakewood incorporated 21 years ago, and is still playing "catch up" on much needed public infrastructure improvements with much more to do. Communities such as Lakewood, and others in the same boat, should be provided a higher priority for infrastructure investment, not less. The current proposal supports the "strong getting stronger" at the expense of less fortunate cities and counties.

Overall, the tiered centers concept appears to favor known affluent communities. It enables their prosperity by awarding them additional points for existing infrastructure at the expense of the less fortunate. For example, this proposal does not take into account low income housing or other community demographics, but it does award additional activity units – *the means by which PSRC assigns points for transportation awards* - for existing access to transit, which is predominately found in Seattle/King County. With fewer transportation dollars potentially awarded to communities with the greatest needs, those who are low income and could benefit most from transit to get to city centers are denied access. As a matter of social justice, shouldn't there be added consideration given for low income areas? It is our opinion that part of government's responsibility is to advocate for the "have-nots." In this case, it is our responsibility to support access to public transportation, regardless of income levels and in spite of existing infrastructure. Every community deserves to be improved.

### **Centers Designation Criteria**

The proposed criteria and eligibility requirements to be a Regional Center favor Seattle/King County at the expense of Lakewood and many other parts of the PSRC service area, yet the needs and wants for Pierce County citizens and businesses are no different: access to transit; job growth; economic prosperity; walkability; and infrastructure investment to not only accommodate future growth in our community, but also to address existing, deficient infrastructure. The City of Lakewood has two primary concerns specific to the Centers Designation rating system and criteria:

1. The proposed Centers Designations are unequal. For example, a key criterion to be a Regional Center is access to transit. Most of the area represented by PCRC does not have access to transit assets (e.g., Sound Transit, light rail, BRT, ferries) like Seattle/King County, yet this area's needs are no different from a standpoint of infrastructure investment.
2. Cities are placed in tiers based on the number of "activity units" they have in their Regional Centers, a method that has not been adequately communicated or understood among all member cities. According to the Centers Framework Draft, activity units are calculated using a "simple function" provided by PSRC that population + employment = activity units. Population + employment appear to be measured against gross square acres. In addition, the report lists: existing jobs and housing, planning for growth, mix of uses, quality transit service, walkability,

potential to grow and overall destination as “key ingredients.” It is unclear how these other “key ingredients” are factored into a jurisdiction’s final activity unit total.

Scenario: There are situations where this approach becomes problematic. What if one city has more open space in their Regional Center? Would providing open space cause a city to have more gross acres and thus fewer activity units? What if the city has larger roads and right-of-way? Do existing sidewalks and bike lanes give a city more points for walkability or fewer points because it increases gross square acres? How are these “key ingredients” factored in? How are cities given additional points for planning, for example, the implementation of a subarea plan? Are planning documents evaluated fairly and equitably?

Had PSRC met with communities one-on-one and involved policy makers in the planning process, cities would have been able to prepare any necessary changes to their existing centers, which are now ‘rated’ under the new criteria. Creating new criteria without encouraging cities to submit revised center boundaries, recent planning materials or otherwise plan ahead, puts many cities, including Lakewood at a disadvantage. Furthermore, providing any additional activity units for “planned development” without reaching out for proposals from each community evaluated, puts PSRC in a position to be one-sided and biased.

**RECOMMENDATION 1:**

Given the numerous unanswered questions, including initial cause and future impacts, the City of Lakewood believes it would be pre-mature to implement any changes to the current regional growth centers or county-wide center framework. The status quo, or what currently exists, should remain in place. This topic would be more appropriately paired with an update to Vision 2040, which should help to ensure that policy makers, and our regions many stakeholders, are given opportunities to provide input, make changes, and strategically plan for the future.

**Manufacturing/Industrial Centers**

The manufacturing/industrial center (MIC) component of the report minimizes and/or does not take into account or consideration the impact of Lakewood Industrial Park (LIP), Pierce County’s fourth largest private employer. It also does not recognize the future Woodbrook Business Park that is now beginning to take shape. Yet these centers, once built out, will have an economic impact measuring over \$1 billion annually to our area.

All of the alternatives use existing and planned job counts as criteria to be eligible for one of the regional tiers. We are curious how PSRC decided the level of employment necessary in order to be included in this list, 10,000 and 20,000 jobs minimum seems arbitrary. Additionally, as more of an emphasis is placed on telecommuting and positions that may not require staff to be located on site, it would be important to clarify how the job counts will be evaluated.

The minimum land requirements are also problematic for many areas including Lakewood. A minimum of 2,000 acres prevents many manufacturing centers with clear regional importance from being recognized. Essentially, only the Ports, and areas with excess land are eligible. The City of Lakewood is largely built-out and surrounded by other entities, which make it impossible to reach the 2,000 acre minimum. However, as stated before, we still do our part for industrial and manufacturing with two large industrial parks located within our City limits.

**RECOMMENDATION 2:**

We request that the arbitrary requirements for the number of jobs and minimum site acreage be removed from the tiered rating system. Additionally, that PSRC take the current Manufacturing and Industrial Centers proposal one step further, and develop a way to recognize all MIC's with sponsoring jurisdictions that meet the requirements on page 13 & 14 of the *Draft Center Stakeholder Working Group Report*.

We understand that requests from the Cities of Arlington and Marysville, to recognize more MIC's than the current plan allows, served as a major catalyst for the Regional Centers Framework Update. Our conversations with PSRC have not indicated a reason why the MIC proposal must be passed concurrently with the regional centers and county-wide centers proposals. Since PSRC is responding to requests from member-cities and addressing an obvious shortcoming of Vision 2040, the proposed alternatives for MIC's are sensible. The City of Lakewood would propose including all MIC's with local sponsors, so more regional manufacturing and industrial centers can be recognized by PSRC and monitored for transportation needs.

**Military Centers Are Regional Centers**

The report provides some compelling justifications (i.e., see Prosperity Partnership's military cluster report, size and location, economic impact, etc.) why this region's military installations should be considered Regional Centers, yet the report recommends that military installations not be considered Regional Centers. The Stakeholder Committee's recommendation illustrates outright resistance to recognize military installations as Regional Centers even though these installations play a significant role in the economies of Pierce, Kitsap and Snohomish counties.

Acknowledging JBLM and its surrounding communities as a Regional Center only benefits the region and Washington State; failing to do so could be costly. JBLM is the largest Army military installation in the Western United States and as the largest single-site employer in Washington State. If you consider JBLM a "business" for comparison, our State and Communities would be busy trying to encourage JBLM to stay within our jurisdiction. Our attention to JBLM and other military bases should reflect the impact their "business" has on our area. JBLM provides over 50,000 service member jobs, supports over 125,000 military retirees and more than 32,000 family members living both on and off-base. JBLM's economic impact on the State (Number 2 employer in WA State representing 2% of the State's GDP after only The Boeing Company) and the Puget Sound region (Number 1 employer in Pierce County representing 34% of the County's economy) should receive resource priority.

**RECOMMENDATION 3:**

At the meeting on April 20, 2017 the Pierce County Regional Council (PCRC) voted in favor of alternative C. The City of Lakewood also supports alternative C, though we disagree that military facilities cannot be considered for stand-alone regional center status. JBLM resides on Pierce County lands covering 86,000 acres. To summarize the legal relationship, there is a reversionary clause that states, in effect, should the federal government vacate JBLM lands those lands would revert to Pierce County. Moreover, given its impact on our region, we would support JBLM and other bases being recognized as Regional Centers and removing the language from page 21 of the *Draft Centers Stakeholder Working Group Report* which reads: "However, because military bases

are exempt from local control and have controlled access, military facilities should not be considered for stand-alone regional center status.”

**Conclusion:**

The City of Lakewood appreciates PSRC and the stakeholder committee’s effort to distinguish the importance of our military bases and to expand the Manufacturing and Industrial Centers recognized across our region. Our primary concern lies with the regional centers and county-wide centers framework update, which does not appear to be justified and has yet to undergo adequate vetting by PSRC, member-cities, or our many stakeholder groups. Implementing a poorly developed plan that does not have a clear purpose or intent seems illogical and irresponsible. Our Cities and their respective elected officials already work tirelessly to ensure that each of our communities are doing our part to make our region great. We fear that with the new regional tiers smaller communities or those that have great need for transportation improvements will be left behind because of how we appear on this tiered system. If this proposal does not have any impact on funding, once again we ask to know its purpose. There is no issue with the current framework and we see no reason to implement new policies.

On behalf of the Lakewood City Council we appreciate you taking the time to review the contents of this letter.

Sincerely,



Don Anderson, Mayor  
City of Lakewood

Copies to:

- Deputy Mayor Jason Whalen
- Councilmember Mary Moss
- Councilmember Michael Brandstetter
- Councilmember Marie Barth
- Councilmember Paul Bocchi
- Councilmember John Simpson
- John Caulfield, City Manager
- David Bugher, Assistant City Manager/ Community and Economic Development Director
- Courtney Casady, Assistant to the City Manager