



AZURE | GREEN
CONSULTANTS

+feasibility +planning +engineering +surveying

phone: 253.770.3144
fax: 253.770.3142
409 East Pioneer, Suite A
Puyallup, WA 98372

November 19, 2014

Frederickson Advisory Commission
Planning and Land Services
Pierce County
2401 S. 35th St.
Tacoma, Washington 98409

Re: COMBINED AMENDMENT:
C-6 COMMUNITY PLAN AMENDMENT: Frederickson Community Plan Employment Services (ES) Zone
M-4 AREA-WIDE MAP AMENDMENT: Employment Center (EC) Designation with Employment Service (ES) Zone, Frederickson Area
Applicant: FRETOC, LLC

Dear Commission Members:

We have reviewed the staff report for the November 24, 2014 hearing. We have a number of comments and observations.

First, we would like to supplement the staff report with the full text of the Amendment C-6 and Amendment M-4 that were initiated by the County Council and sent forward to the Frederickson Advisory Commission for review and recommendations to the Pierce County Planning Commission and the Pierce County Council. We have attached these amendments to this letter.

The preliminary staff recommendation included in the staff report is as follows:

Preliminary Staff Recommendation

Staff does not support the proposed policy amendment to the Frederickson Community Plan. The amendment significantly expands the range and size of uses allowed in the ES zone classification. This expansion is not consistent with policies in the Pierce County Comprehensive plan that limit commercial uses in the Employment Center land use designation to those that service the area's workforce. In addition, policies within the Frederickson Community Plan call for commercial uses within the Employment Center designation to be subordinate to and supportive of employment uses. Expanding the allowed uses within the ES zoning classification undermines the objectives for the Employment Center land use designation.

Staff does not support the proposed Area-Wide Map amendment. The proposed amendment is not a change of land use designation; rather, it is a change of zoning classification. Rezoning a parcel to another zoning classification allowed within the overarching land use designation is a quasi-judicial rezone application. Pierce County Code 18A.95 provides the procedures and decision criteria utilized to this process.



Rezone applications are considered by the Hearing Examiner, and must be accompanied by an application for a planned development district (PDD).

Comment on recommendation with respect to proposed amendments to the Community Plan

Staff does not support the proposed changes to the Community Plan Policies, Objectives and Standards. Staff's reason for not supporting the changes is pretty much that the changes are not consistent with the policies that are proposed to be changed.

When the County Council first started adopting Community Plans in Pierce County, they made a policy statement that they did not want to make changes to the Community Plans for at least 5 years to give them a chance to work. In the instance of the Clock Tower development that was conceived for the 57 acres on the northwest corner of 176th and Canyon, the property owners spent nearly \$30,000,000 putting in infrastructure for land uses that were allowed by the current CE and ES zoning designations that were created to implement the policies of the Frederickson Community Plan. Most of the uses that were contemplated by the Clock Tower development lacked any market demand at this location. The project was doomed to failure and eventually was repossessed by lenders.

An important element of the Frederickson Community Plan was the Central Place. The Community Character and Design Element of the Community Plan included the following:

INTRODUCTION

Community design deals with the physical elements that compose the character of our communities: the streets, parks, buildings, open space, and neighborhoods that determine the way our communities look and feel. It is a blending of land use planning, architecture, landscape architecture, and environmental protection. Community design looks at the way in which buildings, streets, public places, natural features, and other development relate to one another and the people who use them. Through community design, individual improvements, such as street construction, park development, land use regulation and new commercial, industrial, residential and civic development can be effectively coordinated with each other to promote a unified community image.

DESCRIPTION OF CURRENT CONDITIONS

Over the past three decades, the number of homes in the community has swelled to nearly 5,000. Population has increased from less than 1,000 people in the early 1960s to more than 14,000 people today. During this time considerable industrial growth has also occurred in the community. Retail and service development within Frederickson, however, is very limited and there is no defined commercial/civic core within the community. Residents typically travel to adjacent communities to meet their shopping needs.

While much change has occurred in the community in recent years, opportunity still remains to significantly shape the future character of Frederickson. Canyon Road East and 176th Street East are still relatively undeveloped and are not dominated by



continuous commercial strips. Significant pockets of open space and vacant land remain, and substantial tree cover is still present.

DESCRIPTION OF DESIRED CONDITIONS

The citizens of Frederickson want to better define the community and help to ensure that it remains a desirable place to live as it continues to grow in the future. The community plan enacts measures to ensure future development will contribute to visual and functional amenities.

The goals of the community plan are accomplished through policies, regulations, and design standards. However, adoption of the community plan will not result in immediate change.

Significant and lasting change will occur over time through the realization of the implementing actions and citizen support.

CENTRAL PLACE

Frederickson needs a centralized commercial and civic core that can help to better define the community as a place. The community plan would create such a core at the four corners of the intersection of 176th Street East and Canyon Road East, near the geographic center of Frederickson. This core will provide a mix of community scale commercial and civic uses business interconnected with plazas and pedestrian walkways. Potential uses include grocery stores, banks and other professional services, barber shops and other personal services, and government offices. The core is intended to provide opportunity for community members to interact with one another and to be a well-designed area that residents and visitors can easily identify as being with Frederickson. Buildings will be of quality architectural design and sites will incorporate ample landscaping, plazas, signage, and other features that will be used to create an aesthetically pleasing atmosphere and provide a sense of the community.

We have found that the "Central Place" will only come to pass by making the changes that have been suggested to allowed uses. Successful commercial centers need to have strong anchor tenants or they cannot attract the type of smaller tenants that we all want at this location.

To merely take the position the staff has taken that we should not make the requested changes because they are in fact a change is not wise planning. We need to look at what has worked well and what has not worked well and make changes that are needed to meet the overreaching community goals.

Comment on recommendation with respect to proposed area wide map amendment

Staff does not support the proposed Area-Wide Map amendment. Staff correctly states that the proposed amendment is not a change of land use designation; rather, it is a change of zoning classification. Staff further states that rezoning a parcel to another zoning classification allowed



within the overarching land use designation is a quasi-judicial rezone application. Pierce County Code 18A.95 provides the procedures and decision criteria utilized for this process. Rezone applications are considered by the Hearing Examiner, and must be accompanied by an application for a planned development district (PDD). While what staff states regarding the process for rezoning property is correct, this only applies to applications for rezoning by property owners.

The current Countywide comprehensive plan update process, along with amendments initiated by the County Council, allows for changes to land use designations, comprehensive plan policies, community plan policies, changes to implementing regulations in Title 18A and 18J and changes to zoning classifications. All of these can be done by the County Council under the current update process without necessitating zone change applications and PDD's as would be required outside of a comprehensive plan update process.

The zoning designations will be changed, throughout the County, as part of the implementing regulations with any map amendments the County Council ends up approving during this update process.

Impact Analysis (alternate findings to those provided by staff)

Procedures for Amendments to the Comprehensive Plan, PCC 19C.10, requires all amendments to the Plan to be evaluated based on the following (PCC 19C.10.065 A.):

1. Is there a community or countywide need for the proposed amendment? If so what is that need?

Yes. There is a countywide need to retain the Frederickson EC as a significant land base for industrial and manufacturing development to maintain opportunities for job creation. To support this countywide need, commercial uses in the Frederickson ES zone need to be expanded and modified to allow for the location of anchor tenants that will attract other retail tenants necessary to make a successful retail center. This will provide the goods and services necessary to attract significant employers to the EC zoned properties south of 176th St. E.

2. Is the infrastructure available to support the requested amendment, such as sewer, water, roads, schools, fire support?

Yes. Infrastructure is available to serve the area:

Sewer: Pierce County Utilities sewer mains and private sewer mains have been installed within and abutting the CE and ES area.

Water: The City of Tacoma is the water purveyor to the CE and ES area.

Roads: Canyon Road and 176th Street East traverse the area. Both are urban principal arterials.

Schools: The area is in Bethel School District #403.

Fire: The CE and ES area west of Canyon Road is in Central Pierce Fire Protection District #6.



3. Would the requested amendment provide public benefits? If so, what sorts of public benefits?

Yes The amendment would increase opportunities for commercial and service development. Resulting public benefits include an increase in options for retail shopping and obtaining consumer services. Commercial and service development would generate tax revenue and jobs. This commercial and service development would provide essential services that are necessary to attract industrial and business opportunities to the EC zoned land in Frederickson, thus helping to generate additional revenues and jobs for the Frederickson area.

4. Are there physical constraints on the property?

Pierce County data identifies the following physical constraints:

- Wetlands or potential wetlands in the north portion of the site, primarily in the area in the CE zone. The wetlands have been delineated and wetland restrictions have been recorded.
- Possible fish and wildlife habitat in the northeast corner of the site. This habitat is well off the site to the north.
- The entire site is in the Clover/Chambers Creek Aquifer, EPA Sole Source Aquifer, and an aquifer recharge area. The northwest portion of the site is in a Vulnerable Deep Aquifer Area. Storm drainage on the site is all being infiltrated in conformance with aquifer recharge requirements.
- A FEMA flood hazard area is located at the north boundary of the site. The south portion of the site includes areas with 20 to 40 percent slopes.
- The north and east portions of the site are in an open space corridor.

Pierce County Development Regulations address development impacts related to these constraints.

5. Are there environmental constraints, such as noise, access, traffic, hazard areas on or adjacent to the proposed amendment?

The following constraints exist on or adjacent to the site:

- Canyon Road East and 176th Street East provide the primary means of access to the EC area. Increased traffic congestion on these heavily used roads would result from traffic generated by large scale commercial development occurring in the current and proposed expanded ES area. Traffic studies have been completed assuming the full development of the site for retail uses. Pursuant to the recommendation in the traffic studies, new traffic signals are being constructed at the site entrances on Canyon and 176th. The turn lane at the entrance on Canyon is also being lengthened to provide more queuing. These improvements mitigate for the increase in traffic. The location of more retail at this project will reduce the number of trips from the area to retail establishments located away from the site on the Meridian and Pacific corridors.
- Clover Creek flows roughly parallel to the north boundary of the site, approximately 400 for 500 feet to the north.



6. What types of land use or activities are located on the property?

The parcels zoned as CE and ES in the amendment are area have been improved with private roads, public and private sanitary sewer, water, storm drainage, street lights etc. The infrastructure improvements were constructed as part of the Canyon Clock Center project that was intended to include, motels, multi-plex theaters, grocery stores, health clubs, restaurants, offices and other commercial uses. The market demand did not exist for the uses contemplated, all of which are allowed by the current ES and CE zones. Some of the uses contemplated will succeed with the location of suitable anchor tenants in the project.

7. What types of land use or activities are located on neighboring properties?

Developments and uses on properties abutting amendment area include:

North: Single-family residences

East: Sportsman's club, commercial vacant land, gas station

South: Commercial vacant land

Southeast Safeway anchored shopping center.

West: Railroad track, Williams Gas pipeline easement. Single-family residences west of the railroad track and parallel gas easement.

8. Is the proposed amendment consistent with all applicable state and local planning policies?

The proposal is not consistent with some of the policies of the Comprehensive Plan and the Frederickson Community Plan. Existing policies allow for commercial uses in the EC land use designation only to support, or serve the daily needs of the EC workforce. It is necessary to modify the existing policy to expand allowed uses in the ES zone classification to include "big box" stores and other commercial uses so that the "Central Place" envisioned in the Frederickson Community Plan can become a reality. Without these changes, the current CE zoned property that comprises the northerly 30 plus acres of the Frederickson Town Center will likely be developed in a fashion similar to the CE development on 163rd St. E. east of Canyon Rd. E. This area is developed predominantly as contractor's yards and general warehouse and storage. That type of development was never contemplated to occur in the "Central Place" and would be contrary to the vision in the Community Plan. The proposal could result in extensive commercial development that will provide the goods and services necessary to attract industry to the EC zoned land to the south.

Thank you in advance for your consideration.

Hopefully we can move forward together to bring the Frederickson Town Center back to life!

Paul E. Green

Paul E. Green, P.E.
Director of Planning and Engineering

