



Wednesday, March 19, 2025 @ 6:30 PM

HOW TO ATTEND

- **In-person:** Council Chambers, Lakewood City Hall, 6000 Main St SW., Lakewood, WA 98499
- **Virtually:** Online or by phone.
Online: <https://cityoflakewood-us.zoom.us/j/88030740190>
Phone: (253) 215-8782 and enter meeting ID: 880 3074 0190
- **Livestream:** <https://YouTube.com/CityofLakewoodWA>

Persons requesting special accommodation or language interpreters should call 253-983-7767 as soon as possible in advance of the meeting so that an attempt to provide special accommodation can be made.

PUBLIC COMMENT

Public comments or testimony on public hearings are accepted by mail, email, or by in-person or virtual attendance. Mail comments to Karen Devereaux, Planning Commission Clerk, 6000 Main Street SW Lakewood, WA, 98499 or email kdevereaux@cityoflakewood.us. Comments received by noon on the day of the meeting will be provided to the commission electronically.

IN-PERSON/VIRTUAL COMMENTS

Each person has 3 minutes. Attendees are allowed to speak during public comments or public hearings only. Those attending in person will be called on by the Chair. Those attending via Zoom should use the “raise hand” function to indicate they wish to speak. Once the Chair calls your name, you will be unmuted. First, state your name and city of residence, and then provide your testimony.

WELCOME/CALL TO ORDER

ROLL CALL

APPROVAL OF MEETING MINUTES dated March 5, 2025

AGENDA UPDATES

PUBLIC COMMENT

PUBLIC HEARINGS None.

UNFINISHED BUSINESS

- Multifamily Tax Exemption (MFTE) Program Updates and Residential Target Area (RTA) Map Updates (for action)

NEW BUSINESS

- 2025 Comprehensive Plan Amendments (25CPAs) Introduction Part 2

NEXT STEPS

- REPORTS FROM CITY COUNCIL LIAISON, CITY STAFF, PLANNING COMMISSION MEMBERS
- NEXT MEETINGS: APRIL 2 AND APRIL 16, MAY 7 AND MAY 21
 - o April 2: 25CPAs Public Hearing & annual Shoreline Restoration Activities Presentation

Attachments

- Staff Report: Multifamily Tax Exemption (MFTE), and Residential Target Area (RTA) Map Updates
- Staff Report: 2025 Comprehensive Plan Amendments Introduction Part 2



Lakewood Planning Commission March 5, 2025 Meeting Minutes

WELCOME/CALL TO ORDER

Phillip Combs, Chair, called the meeting to order at 6:30 p.m.

ROLL CALL

Planning Commission Members Present Phillip Combs, Chair; Ellen Talbo, Vice Chair; Mark Herr, Linn Larsen, Philip Lindholm, Sharon Wallace, and Robert Estrada

Planning Commission Members Excused

Staff Tiffany Speir, Planning Division Manager; and Karen Devereaux, Administrative Assistant

Council Liaison Councilmember Paul Bocchi (not present)

APPROVAL OF MINUTES

MOTION: For approval of February 19, 2025, meeting minutes as written.

SECONDED. PASSED 7-0.

AGENDA UPDATES None.

PUBLIC COMMENT

Chair Combs opened the floor for in-person and virtual public comment.

Christina Klas, Lakewood resident and business owner, stated she is not against new development in the residential target areas and urged commissioners to require the developers build mixed-use projects.

Chair Combs closed the public comment segment.

PUBLIC HEARINGS None.

UNFINISHED BUSINESS

Multi-family Tax Exemption (MFTE) Program Updates and Residential Target Area (RTA) Boundary Updates

The Planning Commission hearing on the proposed MFTE program updates and Residential Target Area (RTA) boundary expansions closed at noon on March 5, 2025. Ms. Speir reported that PPW would provide the Planning Commission with a summary of public comments received with City responses to each for review prior to the March 19 meeting.

The Commission members discussed the proposed amendments. They also discussed the frequency and need to update the Downtown Subarea Plan and regulations and the subarea's transportation mitigation fee program. Ms. Speir provided the estimated time frame, end of 2026, for the City to complete its review of the subarea's motorized and non-motorized transportation infrastructure as funded by the RAISE grant.

NEW BUSINESS

2025 Comprehensive Plan Amendment Introduction Part 1

Ms. Tiffany Speir provided an introductory background and overview of 8 of the 12 proposed 2025 Comprehensive Plan amendments:

- 2025-01** Adopt “co-Living Housing” Amendments for consistency with [ESHB 1998](#) (“Concerning co-living housing”)
- 2025-04** Adopt regulatory amendments for consistency with [SB 5792](#) (“Concerning the definition of multiunit residential buildings”)
- 2025-05** Adopt regulatory amendments regarding residential parking for consistency with [SSB 6015](#) (“Concerning residential parking configurations”)
- 2025-06** Adopt technical updates to the Lakewood Municipal Code (LMC) to: reincorporate previous Civic Use regulations; update LMC 18A.10.180 (Definitions) to include “religious assembly”; amendments to LMC 18A.40.080 (A) to allow religious organizations in various land use zones; and amendments to LMC 18A.40.080 (A) to allow day care centers in real property owned or controlled by religious organizations in the MR1 and MR2 zones
- 2025-07** Adopt the 2025-2029 Commute Trip Reduction (CTR) Plan
- 2025-08** Adopt redesignation/rezoning of parcel 0319061001 from exclusively Air Corridor (AC) / Air Corridor 1 (AC1) to “split zoning” of AC / AC1 and Industrial (I) / Industrial 1 (I1).
- 2025-10** Adopt redesignation/rezoning of parcel 5140001191 from Downtown / Central Business District (CBD) to Open Space and Recreation (OSR) / Open Space and Recreation 2 (OSR 2.)
- 2025-12** Recognize RCW 35A.21.440 and RCW 36.70A.130 and adopt regulations regarding allowing new housing in “existing buildings”, as defined herein, zoned commercial or mixed-use in the Lakewood Municipal Code.

The remaining amendments would be introduced at the March 19 meeting, and the public hearing would be held on April 2 for all amendments.

REPORTS

City Council Liaison: None.

City Staff Comments: Ms. Speir provided the schedule of upcoming meetings.

ADJOURNMENT Meeting adjourned at 7:40 p.m.

Phillip Combs, Chair

Karen Devereaux, Clerk



TO: Lakewood Planning Commission

FROM: Jeff Rimack, Director, Planning and Public Works
and Becky Newton, Economic Development Manager

DATE: March 19, 2025

SUBJECT: MULTIFAMILY TAX EXEMPTION PROGRAM RESIDENTIAL
TARGET AREA REVIEW AND CODE AMENDMENTS WITH
PUBLIC HEARING COMMENTS AND RESPONSES

ATTACHMENTS: 1) Public comments; 2) Response Matrix; 3) March 5
Planning Commission Discussion 4) Maps

Summary

Planning Commission held a Public Hearing on February 19 regarding Multifamily Tax Exemption proposed code amendments and potential Residential Target Area (RTA) expansions.

- Public comment received within the comment period of February 19 through noon March 5 is documented here with a staff response matrix that follows.
- All property owners within the borders of RTA expansion consideration as well as within 300 feet of the borders were notified by mail that went out on February 6. Public Hearing was noticed as required in the Tacoma News Tribune. Communication Department posted on the city of Lakewood website and shared on social media.
- RTAs proposed include the Central Business District, Oakbrook, Springbook, and Tillicum.
- A comment letter was submitted for the Lakewood Station District and included in the packet. This is a property owner proposal outside of the RTAs currently being considered.
- Planning Commission discussed proposals March 5.

Propose Changes

Code Amendments

Staff propose the following amendments to facilitate better participation from property owners and developers in the MFTE program. Participation in the MFTE program increases economic development and housing supply in designated areas of the city.

1. 3.64.020(G)-12-year extension added for CBD (City Council Recommendation)
*“Extension for Projects Receiving an Initial Eight-Year or 12-Year Exemption. Any project in the **Central Business District outside of the Tax Increment Area**, Lakewood Station District and Springbrook Residential Target Areas receiving an eight- or 12-year extension may apply for a subsequent 12-year extension in exchange for continued or increased income restrictions on affordable units.”*

2. 3.64.020(H)-MFTE Application Procedure (Staff Recommendation)
“Application Procedure. A property owner who wishes to propose a project for a tax exemption shall complete the following procedures:

*File with the Department of Planning and Public Works (PPW) the required application along with the required fees as set in the Lakewood Master Fee Schedule (adopted annually by resolution). **The application shall be filed after land use permitting is complete or prior to building permit issuance if no land use action is required. Conditional agreements shall be fully executed prior to issuance of building final certificate of occupancy.** If the application shall result in a denial by the City, the City will retain that portion of the fee attributable to its own administrative costs and refund the balance to the applicant”*

RTA Expansion

At the direction of the City Council, department staff reviewed existing zones for potential expansion of RTA locations. The intention was to review which locations were best suited to incentivize economic growth and increase housing stock in the city of Lakewood, while maintaining the character and culture the city is known for.

Having reviewed Springbrook, Lakewood Station, Oakbrook, and the Central Business District (CBD) areas, staff recommend the expansion of the RTA in the Central Business District

This recommendation is made for the following reasons:

City Design/Planning Intentions

- The Comprehensive Plan and subarea plans plan for new growth expectations in population, housing units and jobs.
- The CBD is the area designated in the Comprehensive Plan and Downtown Subarea Plan for a significant share of new housing development and job growth in the city.
- Underutilized in terms of density and location, that Growth Management Act (GMA) would focus development.
- Existing zoning classifications and land use designations support this.
- Maintains continuity of RTAs themselves
 - Aligns borders of the CBD RTA and the CBD itself.
 - Prevents island RTAs in other areas of the city.
- Increased housing is required to maintain the CBDs Regional Growth Center (RGC) designation.
 - RGC designation is necessary to qualify for transportation grants that help finance past, present, and future Capital Road improvement projects throughout the city.
- The 2018 Environmental Impact Study (EIS) and 2024 Supplemental EIS for the 2024 Comprehensive Plan periodic update focused on increased housing density within the CBD and providing proposed mitigation measures for adverse impacts.
- A subarea-wide SEPA planned action ordinance to eliminate the need for specific projects to conduct individual SEPA review
- The Downtown subarea plan update
 - Adjusted zoning map and increased development density
 - Clear design standards and simple design review
 - Simplified parking standards
 - It has the highest density allowances in the city
- Existing infrastructure capacity
 - Frontage improvements are required that allow for multi-modal transportation.
- Traffic mitigation is a focus in the CBD
 - Transportation capital improvements have been implemented to facilitate traffic flows in the CBD
 - The Green Street Loop and Non-motorized plans for pedestrian access are centered in the CBD
 - The city's public transportation transfer facility is located in the CBD
 - The recently awarded Raise Grant is to investigate and provide design improvements for Multi-modal transportation in the CBD

Neighborhood protections

- Design requirements that provide control over the character of any project located within it.
- LMC 18B.200.250 requires a transition area to provide a buffer between higher intensity uses in the Downtown District and lower intensity uses in the residential zones that surround downtown. To address potential impacts to surrounding residences transition areas have restrictions regarding:
 - Building Height
 - Building Setbacks
 - Parking and Loading
 - Refuse Containers
 - Mechanical Equipment

The neighborhood protections listed above are only applicable to the subareas and another reason why the CBD is the staffs recommendation.

Selection of a different location for an RTA will result in conflicts and inconsistency with state laws, in the city's Comprehensive plan and associated subarea plans.

Next Steps

- Planning Commission to review testimony and responses.
- Discussion among the Planning Commission members.
- Provide recommendations back to City Council.

Planning Commission may choose to make recommendations at the March 19 meeting or postpone if more time is needed.

<p>Committer Name</p>	<p>February 19, 2025 Public Hearing</p> <p>Multifamily Tax Exemption (MFTE) Program Updates and Residential Target Area (RTA) Boundary Review Changes</p> <p>Comments to Planning Commission provided February 19 through noon on March 5 2025</p>
<p>Adria Buchanan</p>	<p>Support: I am writing in support of the MFTE program for the City of Lakewood. The MFTE program has many benefits for developers and the community, but ones worth highlighting are:</p> <ol style="list-style-type: none"> 1. Increased Project Feasibility — Helps make projects financially viable in high-cost or underdeveloped areas. 2. Encourages Density & Mixed-Income Housing — Incentivizes multi-family projects in urban centers, transit-oriented areas, or designated growth zones. 3. Encourages Urban Growth & Revitalization — Promotes development in targeted areas, increasing housing supply without direct public subsidies. 4. Supports Workforce Housing — Provides housing for essential workers (teachers, healthcare, service industry) in high-cost cities. 5. Increases Housing Supply — Helps meet demand and potentially stabilizes rents over time. <p>In an increasingly complex housing environment, where financing on the developer side, and economics stability on the renter side is uncertain, MFTEs can help mitigate the risk of a new project, and ensure housing is sited in areas of opportunity for those who need close proximity to jobs and others essential services.</p> <p>Given the benefits of MFTEs, this program also helps facilitate the City of Lakewood's obligation to affirmatively further fair housing under HUD by creating a more inclusive housing environment that expands housing choice. hope Lakewood and the planning commission will continue to affirmatively further fair housing in this way.</p> <p>Thank you for the work you are doing and please continue the MFTE program.</p> <p>Fair Housing Center of WA</p>
<p>Jane Lewellen</p>	<p>To Whom It May Concern:</p> <p>I am a 25 year resident to the neighborhood that is now being targeted to include tax exemptions for all multi-family developers. Our neighborhood currently is diverse in both housing styles, incomes, and residents. It can boast of wealthy, middle class and lower middle class all living next door to one another with no gates in sight. We are a neighborhood, of home owners and home renters. What you are proposing to do, by encouraging developers to fill our borders with multi-family dwelling places will fundamentally change our neighborhood.</p> <p>I have studied the map you sent out. The current target area is large and, for the most part, available. That area includes everything that you hope to do by providing more affordable housing on a bus line, but does not encroach on neighborhoods. It meets the requirement of the state to provide these options. I can think of no good reason to expand to our neighborhood. For every resident that vocalizes their disagreement, there are so many more that are silent. I was one of those silent ones. But, I feel so strongly about this issue, about the unwanted, unnecessary changes to our entire area, that I must make my small voice heard.</p> <p>Please consider the irreversible changes that you plan on making and how they affect the many residents in our neighborhoods.</p>
<p>Jennifer Imholt</p>	<p>I'm submitting my comments on the MFTE & RTA Expansion.</p> <p>I strongly oppose this expansion because it does not address the severe infrastructure challenges in the area and the lack of support for additional residential housing. Specifically, along Gravelly Lake Drive south of Alfaretta Street, we already face significant traffic congestion, and the area is home to a school zone where past fatalities have tragically occurred. Adding more residential housing in this already congested area would only worsen the public safety risks and strain the infrastructure even further. The existing traffic issues in this area are a serious concern. The roads are often backed up, especially during peak hours, and the strain on public services and infrastructure is already evident. Expanding residential development without addressing these issues first would jeopardize the safety and</p>

	<p>quality of life for residents. As I mentioned this area is also home to a school zone, which has already seen tragic accidents. Increasing traffic flow in such a sensitive area would only heighten the risks to children, pedestrians, and families. Public safety must be a top priority, and it is concerning that this expansion could push the area to a point where it is unsafe for residents, commuters, and especially the students who are attending Clover Park. Rather than incentivizing development along Gravelly Lake Drive, the focus should be on areas that are better equipped to handle new growth and where infrastructure improvements can be planned to prevent further strain.</p> <p>Areas like Bridgeport Way or the section of Gravelly Lake Drive north of 100th are better suited for this type of development, where the necessary infrastructure upgrades could be implemented without putting public safety at risk. Lakewood’s Comprehensive Plan stresses the importance of balancing housing needs with maintaining the quality of established neighborhoods: “The community’s housing needs must be balanced with maintaining the established quality of certain neighborhoods” (3.2 Residential Lands and Housing). Encouraging development in an area already dealing with traffic gridlock, safety concerns, and inadequate infrastructure contradicts these principles.</p> <p>In addition to harming the character of established neighborhoods and impacting local wildlife, pushing residential development into this area would exacerbate the traffic and safety hazards already present. With a school zone already having experienced fatalities, this is a risk that cannot be overlooked.</p> <p>I urge the Planning Commission to reject this expansion. Let’s direct development to areas that are better suited for growth and where safety, infrastructure, and quality of life can be safeguarded. Our city’s long-term success depends on making responsible and informed decisions now. Thank you for your thoughtful consideration.</p>
Tricia Parsons	<p>I'm submitting comments regarding the MFTE & RTA Expansion as I am currently out of town, otherwise I would be speaking in person.</p> <p>I'm writing in opposition of this expansion as I believe that we do not need to incentivize developers to build in the established areas of the city, specifically along Gravelly Lake Drive south of Alfaretta St where we have a lovely tree-lined downtown feel and an abundance of small businesses. Developers should be incentivized to build in areas of the city that need improvement and will make the city better (Ex. Bridgeport Way, North of 100th on Gravelly Lake Drive.). The current tax incentivized area has plenty of opportunity for development and that is where the focus should be. Seeping into neighborhoods and pushing out small businesses will not help Lakewood thrive, it will continue to degrade the city.</p> <p>As noted in Lakewood’s Comprehensive Plan: “The community’s housing needs must be balanced with maintaining the established quality of certain neighborhoods”(3.2 Residential Lands and Housing) And: “[This chapter] accommodates growth, while preserving the character of established neighborhoods.” Incentivizing developers in these clearly established neighborhoods along Gravelly Lake Drive goes against Lakewood's Comprehensive Plan because it will be detrimental to the character of these established neighborhoods, current homeowners, and the nature and wildlife surrounding (trees, creeks, animals, et al). Please advise the Planning Commission to vote against this expansion. Let's incentivize the right development in Lakewood, not any development in Lakewood. Our future success as a city depends on it.</p> <p>Thanks for your consideration and thoughtfulness is this matter.</p>
Lynda Rayvon	<p>As a voting citizen of Lakewood and property tax payor I do not agree with the Planning Commission and their vision for our city.</p> <p>Leave our businesses, community spaces and our historical character alone. I will vote NO!</p>
Melissa Jackson	<p>My name is Melissa Jackson, and I am a homeowner in the Clover Park Plat neighborhood off Gravelly Lake Drive. I am writing to express my concerns regarding the proposed tax exemptions for builders of multi-family units/apartments along the Gravelly Lake Drive corridor. I believe that incentivizing this area for multi-family housing is not in the best interest of Lakewood for several important reasons, as detailed below:</p> <p>Environmental Impact: The Clover Park Plat neighborhood is one of the few remaining areas in</p>

	<p>Lakewood with significant tree cover. This area is home to a diverse range of wildlife and bird species and includes Lake Steilacoom and Ponce DeLeon Creek, as well as one of the largest aquifers in Lakewood. The introduction of multi-family housing would likely lead to environmental degradation, negatively impacting the local ecosystems and natural resources.</p> <p>Traffic: Gravelly Lake Drive and its adjacent side streets are already struggling to accommodate current traffic levels. The addition of multi-family housing would exacerbate this issue, overwhelming the existing infrastructure. Furthermore, the proposed apartments on the Barnes and Noble site would compound the problem, creating an even more severe traffic crisis for this area of Lakewood.</p> <p>Safety Concerns for Children: The neighborhood's proximity to schools means that many students walk along Gravelly Lake Drive before and after classes. Increased traffic from multi-family housing developments could pose significant safety risks to these children.</p> <p>Community Enjoyment and Property Values: The neighborhoods along this stretch of Gravelly Lake Drive are popular for pedestrians, dog walkers, nature enthusiasts, and joggers. They provide a safe and pleasant environment for children to play. However, increased traffic and population density resulting from multi-family housing could reduce the overall appeal of these neighborhoods and negatively impact property values. Lakewood's property crime rate is 52 per 1,000 residents, which is already significantly higher than the state average. (Source: Lakewood Crime Statistics, Neighborhood Scout, 2022.) Adding multi-family housing to these neighborhoods could further diminish the desirability of the area for homeowners and potential buyers.</p> <p>Availability of Alternative Development Properties: There are numerous areas in Lakewood with open, cleared, and unused land that are more suitable for multi-family development. Many of these sites are within walking distance of public transportation and Lakewood Towne Center and are convenient to the freeway. Potential development areas include sections along Bridgeport, the other end of Gravelly Lake Drive where businesses have closed, and Pacific Avenue from Ponders to 108th. (A few of many examples). Developing these areas would be less damaging to existing neighborhoods and could help revitalize underutilized spaces.</p> <p>In conclusion, while recognizing the need for more housing in Lakewood, I urge the City Council to instead consider providing tax incentives for the abandoned commercial/mixed and cleared lands that are scattered throughout Lakewood.</p> <p>These empty properties are more suitable options for developments of this scale and type. Rezoning and incentivizing intact neighborhoods for multi-family housing is unnecessary and could have detrimental effects on the environment, community safety, and property values. Preserving our quiet, treed, single-family home neighborhoods is essential for maintaining the quality of life for current and future residents of Lakewood.</p> <p>Thank you for your attention to this matter.</p>
Ginger Hooven	<p>I do not agree! Save our community.</p> <p>There are a lot of small businesses along Gravelly Lake Dr that would be put out of business. I will always vote for the small businesses they are what makes America what it is. And I live right by the area in question I do not want apartments going in at the end of my street. Apartments in general mean more crime, more traffic, more noise, and lowering of home values that live nearby. No please do not do this. Plus there is a church, a bank, as well as other apartments that already exists that would be destroyed.</p> <p>According to the map that I received. Seriously not happy about this, Ginger Hooven on Lake Ave SW. Thank you for your consideration.</p>
Jason Gano	<p>For the record, my name is Jason Gano, and I am a Senior Consultant for DROP. We are a collective of home builders focused on developing healthy, clean housing in Washington State and its beautiful cities.</p> <p>We are excited to see the Planning Commission consider this expansion of the Multi-Family Tax Exemption (MFTE) program and the allowance for the renewal of existing MFTEs. This program has proven to be a positive economic driver for cities. While builders save money during the life of the project, those savings can be used to provide lower rents and to reinvest in future developments—creating a cycle of continued housing growth.</p>

	<p>Although the MFTE program results in a temporary reduction in property tax revenue, the long-term economic impact is overwhelmingly positive. Looking at data from a similar program in Tacoma:</p> <p>The city "gave up" \$14,500 in property tax revenue over eight years (due to the 1% cap).</p> <p>In return, the project generated \$57,300 in other taxes, including \$46,900 in immediate revenue from construction alone.</p> <p>The project also created 3,800 construction labor hours—supporting jobs and economic growth. Most importantly, it provided more housing—something we desperately need to keep our communities thriving.</p> <p>I grew up in Lakewood, Washington—attending Hudtloff Middle School and Lakes High School. This community shaped me, and after going to college, I chose to return here to live and work. Lakewood is a wonderful city, but if we only craft policies to serve those who already live here, rather than those looking to create a future here, we are not planning for progress—we are looking to the past.</p> <p>To attract new and better places to shop and eat, we need more people, and that requires more housing. Better roads, infrastructure, and services require more residents to pay into the system. Schools—which I believe are among the most important investments any community can make—improve when we build more housing and create a well-funded, sustainable environment for students.</p> <p>This all starts with responsible housing development, and Lakewood’s MFTE program is a step in the right direction. Expanding and renewing this program will help ensure that Lakewood remains the beautiful, thriving community that we all know and love.</p> <p>Thank you for your time and consideration. I am available to answer any questions you may have.</p> <p>The Gano Group</p>
Linda Shehan	<p>I believe MFTE should not be expanded on Gravelly Lake Blvd from Nyanza to Main St at the Lakewood Towne Center. This street is unique to Pierce County. The trees and low rise buildings are beautiful, having a residential feel while incorporating small businesses. There are plenty of lots on ugly transit-available roads that can accommodate multi-story apartment buildings. There is no need to destroy the beauty and livability of Gravelly Lake Blvd. I don't understand the MFTE concept. The City has not educated the tax-paying public. I have never seen an article in the Lakewood Connection Flyer or the weekly online newsletter explaining exactly what it is. Does it mean the developer pays no taxes for 8 or 12 years, or just a portion of the annual tax? I pay over \$6000 per year in property tax for an Oakbrook rambler. If I build a four--plex on my lot and rent it out at an affordable rate, will I qualify for the MFTE? The City owes the public some public education with full disclosure on exactly how much the developers won't pay in taxes for each project, and then how much the Lakewood taxpayers will have to pay for all the infrastructure costs that will ensue. There should be lots of opportunity at the Mayor's coffee meetings, the neighborhood meetings, and online and print mailings.</p>
Mary Bergin-Sperry	<p>I, Mary Pat Bergin-Sperry have been a resident of Lakewood for over 60 years and have lived off of School St, 100th St and presently live on Ponce De Leon Terrace SW. I realize the City of Lakewood must grow and develop in both businesses and housing and with focus in the CBD district. I do believe with the new Alliance project approved and moving forward we should pause on new housing development for now and focus on some key cornerstone community development that would bring the community together in the CBD area. I would like to see the focus on development of a Community Center and starting with the Colonial Center Development. I know money for revitalizing the old Lakewood Theater is an issue but getting a developer to take this area on and maybe have Lakewood Players move in along with other Community performances.</p> <p>As mentioned this area is the Gateway to City of Lakewood and then work our way down Gravelly Lake.</p> <p>I think the Lakewood Mall Park would be a cornerstone development and then work business around this. A business like an ice Arena Park would bring all ages of the community together and create an environment that the community would gather. On the subject of housing, I would like to see developers develop nice condos (for ownership) and some Assisted Living Developed in the CBD area. It is a shame that Lakewood has few options for Assisted Living or Senior housing. I have</p>

	<p>known many Lakewood Citizens that have lived the majority of their lives in Lakewood and in their Senior Years needing to relocate because the City of Lakewood does not have housing to meet the elderly needs. In summary, I would like to voice my opinion not to encourage developers for tax incentives for more apartments and to focus on buildings and business that would bring the citizens of Lakewood together for all ages.</p>
Clarence Phillips	<p>Thank you for the opportunity to Express my concerns as a resident and home owner of the neighborhood in the counsel crosshairs. I've lived on Wildaire Rd SW since 1990 and have seen many changes, many for the good. However, what is being proposed with Gravelly Lake Drive and the old library property is reprehensible. The issues are, renters with no skin in the game, having no real connection with the community as a whole, and an up-tick in crime. The development of Gravelly Lake Drive will definitely encroach on the homeowners there. After retiring from the military and state corrections it will be a sad day when I sell due to this development going through. Please count cost and if you have no better idea for the head of Wildaire Rd SW, make it a park. Keep Olympia off our back! Thank you.</p>
Bob and Candy Tingstad	<p>In reference to the letter we received regarding rezoning Gravelly Lake Drive, we stand opposed. While we recognize the need for housing, no manner of traffic abatement will handle increased traffic on Gravelly Lake Dr. Already, with 4 lanes, the road becomes incredibly congested, with immovable intersections, at times. With Clover Park High School across from the proposed rezone strip, the traffic is so heavy that we have difficulty getting out of our neighborhood safely and in a timely manner.</p> <p>There are commercial properties already from 112th to Park Lodge School, and beyond. Why rezone? If it is to rezone for potential apartments on the property where the Lakewood Library should be rebuilt, those neighbors will rise up and protest, as will those of us who drive that road daily. Lakewood should be a walkable city. We appreciate the sidewalks on 112th by CPHS. As someone who walks 3-5 miles a day on our city streets, crossing many Lakewood intersections is a scary endeavor. Getting across Gravelly Lake Dr at 112th is not for the faint of heart or slow of foot. Increased traffic will compound the problem. Please submit our comments to the planning commission.</p> <p>Thank you for your attention.</p>
Janice Kampbell	<p>I am curious if the City of Lakewood Planning Commission proposal MFTE regulation amendments and planned use of these targeted areas includes " zones of opportunity" for investors. A sweet deal to LLC's and other investor groups to build their housing units and not pay property taxes for a number of years under their ownership, usually 8-10 years. Tacoma used this "strategy" to build numerous 6-8 story "market rate" apartments, no mixed rent, no low income rent options along the slope leading to Commencement from the Hilltop neighborhood. Using 20% of our area median income to claim any "low income rental units"(and I see you don't) does not even touch low income potential renters needs. Can you project or predict what rent would be for the 20% of these units that you suggest will be affordable?</p> <p>Does your proposal then allow commercial property owners in the proposed expansion area to tear down their buildings and build or sell to investors who will build apartments?</p> <p>How many units does the City of Lakewood currently have within their boundaries?</p> <p>Market rate, mixed rent and low income categories?</p>
Sunny Pepin	<p>Hello! Because you are the planning commission clerk, I wanted to reach out to you directly. I will be unable to attend the Public Comment meeting regarding the Proposed Residential Area Expansion next week and I'd like to have my comments about this proposal read by someone who is part of the decision making process for this expansion, so thank you in advance.</p> <p>My husband and are business owners and homeowners in Lakewood and have been since 2021 (born and raised in Pierce County) — The home that we purchased is a historical home built in 1927 by John Dower. Our home is of historical significance, but lost to time and development to the area. One of the reasons that we bought our home and moved to Lakewood, is because these old houses and the old buildings need to be honored and saved, within reason. As much as we need housing in our city, there has to be a way to strike a balance between demolishing buildings that house thriving businesses and building housing. As I drive down Bridgeport to Gravelly Lake, the number of</p>

	<p>vacant buildings and empty lots would provide room for development near grocery stores, schools and bus lines. The QFC, the former Lakewood Library site, the Ford Taurus junkyard near Steilacoom Blvd. & Bridgeport, The Statuary and Antique shop, the old auto repair place across from QFC, the former real estate office across from House of Donuts, the empty concrete pad that used to be a department store at Town Center, the Bed Bath and Beyond, the list goes on and on...</p> <p>Lakewood is starting to look it's long term vision and plan is a city full of vacant store fronts and gravel lots, while buildings that have tenants and businesses will be torn down to build something for tenants and businesses. Additionally, demolishing these buildings removes trees, fill the dump with building materials and tax breaks for developers also come at cost to the long term sustainability for government and rob our future programs.</p> <p>Why as a city do we support the homogenization of our area by tearing down the businesses that serve our community? Are we unable to cultivate partnerships with developers to fill current vacant spaces with affordable housing and vibrant communities?</p> <p>Please reconsider the expansion area to it's original zone and find ways to build housing in pre-existing vacant lots.</p>
<p>Tricia Parsons</p>	<p>I'm submitting comments regarding the MFTE & RTA Expansion. I'm writing in opposition of this expansion as I believe that we do not need to incentivize developers to build In our established areas of the city, specifically along Gravelly Lake Drive south of Alfaretta St where we have a lovely tree-lined idyllic town feel.</p> <p>Developers should be incentivized to build in areas of the city that need improvement and will make the city better (Ex. North of 100th on Gravelly Lake Drive, South Tacoma Way, Bridgeport Way). The current area does not need to be expanded.</p> <p>As noted in Lakewood's Comprehensive Plan: "The community's housing needs must be balanced with maintaining the established quality of certain neighborhoods" (3.2 Residential Lands and Housing) And: "[This chapter] accommodates growth, while preserving the character of established neighborhoods."</p> <p>Incentivizing developers in these established neighborhoods along Gravelly Lake Dr goes against Lakewood's Comprehensive Plan because it will be detrimental to the character of these established neighborhoods, current homeowners, and the nature and wildlife surrounding (trees, creeks, animals, et al). Let's incentivize the right development in Lakewood, not any development in Lakewood. Thanks for your consideration and thoughtfulness in this matter, Lakewood citizens do care.</p>
<p>Rob & Jill Jensen</p>	<p>Thank you for the opportunity to comment on the 12 Year MultiFamily Tax Exemption being considered by the city of Lakewood. We would like to provide a few comments to you regarding this exemption as people who resided in Tacoma beginning in 2004 and lived with the long term effects of this plan through the years.</p> <p>We are attaching for your review the December 2024 Tacoma North End Neighborhood Council - a council Jill served on for several years - meeting where Mike Lonergan, Pierce County Assessor, addressed some of the impacts of the MFTE. His informative presentation begins at 12:38: tube.com h?v=iz0470</p> <p>Lakewood, as you well know, has a very low tax rate compared to other cities in Washington. It makes it an affordable place to call home, yet-one which still finds the means to invest in our quality of life with parks, libraries, well-regarded and responsive emergency service departments, ongoing road improvements, etc.</p> <p>Tacoma, before offering the 12 year tax exemption (to approximately 160 developers) used to enjoy that same quality of living: affordable taxes, good Police and Fire protection, schools, park improvements, street beautification, etc.</p> <p>But the 12 year exemption has come with a high cost for the tax-paying citizens of Tacoma since they are not paying their share of costs for the infrastructure improvements when so many new residents move into their properties. Such pressures due to increases in school attendance, wear and tear on roads and libraries, sidewalks, sewer systems, significant parking issues, removal and no replacement of tree canopy, etc are real, and the cost for upgrading falls to the local tax-paying homeowners.</p> <p>Yes, it appears the MFTE will provide answers to the state's mandated requirements to provide</p>

affordable housing, but look at Tacoma to see whether or not this is indeed the case. The Paper trail alone in trying to manage whether or not the MFTE property owners are abiding by the law is monumental. Seattle has chosen NOT to do this - my hope is Lakewood will thoroughly investigate why. The resulting 'costs' - personally and monetarily - for Tacoma residents has forced many to leave, ourselves included. The timely newspaper article Jill dropped off at the last Lakewood City Council meeting shows a developer with an 8 year exemption now asking for an additional 12 year tax exemption which the council granted!

When does it stop?

We have owned two homes in Tacoma since 2004. In 2022 we sold one, and next year our plan is to sell the other. When there is a shortage of dollars to run our city, the taxation of Residents is their first line of action. But it is not taxes that caused us to leave Tacoma for Lakewood. It is the developers - with Tacoma's carte blanche agenda- that has changed the QUALITY OF LIFE - the quality of education in our schools, the lack of new parks, our potfilled roads, no infrastructure improvements, tree removal- the list goes on and on.

PLEASE carefully consider Lakewood's next steps forward before doing what may seem like the easy solution - a 12 year MFTE is not the best answer. Our city needs revenue to continue on its current path of maintaining the welcoming place you have all helped create. Let us not lose sight of that vision for what seems like an easy way out.

We have additional information/documents we are happy to share with your council.

Thank you for your dedication, service and consideration to the residents you serve.

Chris Klas

Thank you again for this time to have written comment. I have stated it before: I am not against downtown development. I am actually in favor of development. I just think the city has shown a lack of creativity and effort to make new construction reflect the "character and culture of the city" as the economic development coordinator said on 2/19 at the planning commission meeting.

In all of my conversations thus far, everyone who is in support of development has dreamed of a walkable, shoppable mixed use community in the central business district. However, the permitting process for the use of the MFTE does not say anything about a requirement for mixed use development.

How do we get to the goal of a thriving business district if we do not mandate that type of development?

I propose that the planning commission advise the city of Lakewood to stop the expansion of the RTA until they are able to do the following: In any of our Residential Target Areas where an MFTE application might be submitted, if the land/property either:

1. currently has business/commercial property on it or
2. Abuts a main road

These permits must REQUIRE mixed use construction.

DO NOT ALLOW for the continuation of big box apartments in the downtown corridor. It is possible for the city to require this type of construction in the commercial zones. Tacoma already does this. The Tacoma city codes are quoted below. As well as a few photos attached to show how creative cities have built mixed use residential spaces.

Thank you for reading this and for considering what is the best long term plan.

From the Tacoma city codes:

The specific purposes of the Mixed-Use Center Districts regulations are to:

1. Increase the variety of development opportunities in Tacoma by encouraging greater integration of land uses within specific districts in a manner consistent with the Growth Management Act, the Regional Plan: Vision 2040, the County-Wide Planning Policies for Pierce County, and the City's Comprehensive Plan.
2. Strengthen the City's economic base by encouraging more efficient use of existing infrastructure and limited land supply through mixed-use, density, and design, as well as transit and pedestrian orientation in specified centers.
3. Allow and encourage a variety of housing options within mixed-use centers, including residences over businesses that can promote live-work arrangements which reduce demands on the transportation system.
4. Help provide employment opportunities closer to home and reduce vehicular trips for residents

	<p>of the City and surrounding communities by encouraging mixed-use development.</p> <p>5. Create a variety of suitable environments for various types of commercial and industrial uses, and protect them from the adverse effects of inharmonious uses.</p> <p>6. Allow commercial and industrial growth in specified centers and/or districts while minimizing its impact on adjacent residential districts through requirements of buffering, landscaping, compatible scale, and design.</p> <p>7. Accommodate and support alternative modes of transportation, including transit, walking, and bicycling, to reduce reliance on the automobile by making specified centers more “pedestrian-oriented” and “transit-oriented” through the provision of street amenities, landscaping, windows, continuous building frontages, limited curb cuts, and direct pedestrian entrances adjacent to the right-of-way and/or public sidewalk.</p> <p>8. Locate and design parking to be consistent with the overall intent of providing a pedestrian and transit supportive environment that encourages human-oriented design instead of vehicle-oriented design and promotes alternatives to single-occupancy vehicles. Examples include building location at the street, parking location behind or within buildings, adequate screening, avoidance of pedestrian-vehicle conflicts, and conveniently located transit stops.</p> <p>9. Within Centers, the core areas of the district are the central hub and focus for the greatest level of growth and activity. Within these core areas, enhanced standards and design flexibility is appropriate to ensure that they are developed consistent with the community vision and goals for these areas, as outlined in the Comprehensive Plan.</p> <p>10. To promote and attract dense infill development that may otherwise have resulted in the expansion of the region’s urban footprint into sensitive greenfield areas within the watershed, and to achieve a compact land use pattern that promotes air and water quality, healthy watersheds and the reduction of regional stormwater runoff.</p> <p>11. To implement the Tacoma Mall Neighborhood Regional Growth Center vision of a thriving center of regional significance and a distinctive, connected, livable and healthy place offering a wide range of opportunities for all people to live, work, invest, and fulfill their potential.</p>
<p>Rob and Cindy Gardner</p>	<p>Regarding the RTA and multi family property tax incentive: My wife and live in Lakewood and strongly ask that the RTA tax incentive program not be enacted. In addition, we feel the RTA should be rezoned back to residential for the following reasons:</p> <ol style="list-style-type: none"> 1. The referenced RTA is the sole stretch of Gravelly Lake Drive that is mostly built out with various businesses and established foliage. 2. Bridgeport Ave between 112th and Custer consists of various run-down or abandoned buildings which would be ripe for redevelopment options that would help to ease new housing demand making it more appealing. 3. That part of the RTA opposite Clover Park High School, to be considered as encompassing the CBD is illogical as the school is certainly not part of the master plan as a development site. <p>In summary: Expanding the CBD to the West seems to only benefit a current developer and, in our minds, the Pierce County Library.</p> <p>I would like to encourage the Planning Commission to postpone any recommendation to the Lakewood City Council regarding the RTA and MFTE at this time. After the Alliance project is completed and you evaluate the occupancy, effect on local schools, and traffic, your recommendation to the City would carry more weight. Surely the wait would be worth the improved data outcome.</p>
<p>Karen Blake</p>	<p>I am protesting the proposed multifamily development along Gravelly Lake Drive. My husband and live on 111th and Meadow Dr, too close to the planned area to be developed. This is the 3rd house we have purchased in Lakewood. We have been in this community for over 15 years. The block we live on is largely homeowners or long term renters. These friends and neighbors are important to us. We feel our grandchildren are safe to play throughout the neighborhood and walk to the local park without fear. During the school year, many students and teachers take a break and walk our streets. We have a lot of big trees that offer shade and peacefulness. I have never felt as safe as I have here.</p> <p>My main concerns are as follows:</p> <ol style="list-style-type: none"> 1) Safety and Health: I am older and walk this neighborhood alone. I would not feel I could continue this activity.

	<p>2) Traffic & Parking: Our property is approximately 2 acres that extends to Gravelly Lake Drive. We are quite aware of the racing cars and accidents happening at the corner of 112th and where Nyanza/Gravelly intersect. The marking on Gravelly directing the inside lane to go straight and the right lane to turn to Nyanza is poorly marked, causing unfamiliar drivers to make sudden decisions creating accidents. More cars and pedestrians would increase this issue. Have you tried to park at Safeway in the late afternoon? No parking. We already have a lot of traffic.</p> <p>3) Trust: When I have problems, I have reached out through the “Lakewood App” to voice my concerns over code violations. get a response with #25-9469 but nothing gets corrected or followed up on. This frustrating lack of enforcement worries me when we have more people and more problems.</p> <p>Another issue have with the city is the lack of quality control when they decided to improve our roads. I agree there are some roads that need attention but our streets (111th, Meadows, School, Lake Ave, Wildaire) are all worse after the work was done. still, loose gravel gets in your tires, shoes and animal! paws. After rain, we have large pools of water. The end result is far worse than before this “improvement” was done. My dog will not walk on the roads now and he loves to walk with me. Sad.</p> <p>I believe there are far better locations to build affordable, multi-family units. How about the old QFC that has been an eyesore, hazardous site and a safety problem for years? We have so many vacant business locations that could be looked at. Please leave my neighborhood as is. Please don’t turn us into Seattle.</p>
<p>Mandy Imholt Candler</p>	<p>I am a longtime Lakewood homeowner. My mother was a stakeholder in the Cityhood process, and this attempt to zone multi-family apartments into a gentrified neighborhood is definitely NOT what the City Founders had in mind for local control of our town.</p> <p>Here are my concerns:</p> <p>The traffic mess that is already present on Gravelly Lake Drive the impact on our tree-lined neighborhoods the impact on local, small businesses in this area (and we all know that Lakewood does not retain/ recruit enough small businesses) the fact that developers who stand to gain financially from the re-zone are able to speak at the Planning meetings the fact that at least one developer actually sits on the Planning Commission (should have to recuse, due to conflict of interest). Lakewood may need housing, but why this neighborhood, when other areas, already completely paved over are 1. near transit and 2. ready for development ? I see many prime locations on Pacific Highway, areas on Bridgeport, Northern Gravelly Lake Drive, etc. It's almost as if the Planning Commission already has developers in their pocket to deploy in the new zoning area. When an apartment building is erected on the old Lakewood Library site, we will know that this was all part of the plan from the beginning.</p> <p>The City Council hopefully represents us, the Citizens of Lakewood, and hopefully will be the final deciders. However, the Planning Commission should listen, and not approve this rezone.</p>
<p>Lakewood Chamber of Commerce Board of Directors</p>	<p>Lakewood Chamber of Commerce Board of Directors Draft Position Statement Multi-Family Tax Exemptions in Residential Target Areas March 3, 2025</p> <p>Thank you for the opportunity to weigh-in on an important topic that will shape the future of our city's development.</p> <p>As we all know, the free market dictates that individuals and business have the right to buy and sell property, and that includes land transactions. Public opinion, while important in many aspects of governance, does not inherently factor into the transactional nature of a free market system. In all likelihood, developers have already reached out to property owners with tentative offers on the Gravelly Lake Drive site.</p> <p>With two projects already pending Multi-Family Tax Exemptions (MFTE) on Gravelly Lake, we can reasonably assume that discussions are well underway. This brings us to the question: If development is inevitable, how can the city play an active role in ensuring that it aligns with our community's vision?</p> <p>Cities have both the right and the responsibility to influence the aesthetics and overall appeal of development at our front doorstep. One of the most effective tools at their disposal is the</p>

	<p>strategic use of MFTEs. Instead of offering tax credits merely to meet state-imposed timelines, the city should use them as an incentive-a "carrot"-to ensure that new developments adhere to thoughtful architectural guidelines. Whether it be in design elements, materials used, or overall integration into the existing landscape, tax credits should be leveraged to shape development in a way that benefits the entire community.</p> <p>Furthermore, it is imperative that we pause and carefully evaluate the proposed extension of the residential target area (RTA). Before making a blanket expansion, we should determine specific guidelines that reflect the unique feel and character of each zone. Should we consider requiring retail spaces on first floors to enhance walkability and economic vibrancy? What additional amenities could be part of an incentive package to encourage builders to contribute meaningfully to our community's fabric?</p> <p>The city has had expansive discussion about requiring mixed use components alongside any residential dwellings. It would serve the city and community well to ensure that all future developments meet the intent and vision of that mixed use component.</p> <p>With this in mind, the Chamber recommends that the city greenlight MFTEs for Oakbrook, Springbrook, and Tillicum within their targeted RTAs. However, we strongly urge a more in-depth discussion regarding the Gravelly Lake Drive extension in the Central Business District (CBD). This is not simply a matter of adding more housing; it is a question of how we want our city to look and function in the years to come.</p> <p>By taking a measured, strategic approach, we can ensure that development enhances- not detracts from-our community's character, appeal, and economic strength.</p> <p>We are willing to come to the table, if invited, to discuss this important issue to collaborate and brainstorm. Thank you again, for asking for the Chamber's input.</p>
<p>Mandy Imholt Candler</p>	<p>I am a longtime Lakewood homeowner. My mother was a stakeholder in the Cityhood process, and this attempt to zone multi-family apartments into a gentrified neighborhood is definitely NOT what the City Founders had in mind for local control of our town.</p> <p>Here are my concerns:</p> <p>The traffic mess that is already present on Gravelly Lake Drive the impact on our tree-lined neighborhoods the impact on local, small businesses in this area (and weall know that Lakewood does not retain/ recruit enough small businesses) the fact that developers who stand to gain financially from the re-zone are able to speak at the Planning meetings the fact that at least one developer actually sits on the Planning Commission (should have to recuse, due to conflict of interest). Lakewood may need housing, but why this neighborhood, when other areas, already completely paved over are 1. near transit and 2. ready for development ? see many prime locations on Pacific Highway, areas on Bridgeport, Northern Gravelly Lake Drive, etc. It's almost as if the Planning Commission already has developers in their pocket to deploy in the new zoning area. When an apartment building is erected on the old Lakewood Library site, we will know that this was all part of the plan from the beginning.</p> <p>The City Council hopefully represents us, the Citizens of Lakewood, and hopefully will be the final deciders. However, the Planning Commission should listen, and not approve this rezone.</p>
<p>February 19 In person and Zoom comments</p>	<p>James Guerrero, Lakewood resident, spoke in favor of the proposed changes in the Central Business District along Gravelly Lk Dr SW.</p> <p>Taylor Lee, Bellevue, mother owns a business in Lakewood Station area, spoke in favor of making changes to the RTA boundary specifically for the Lakewood Station District.</p> <p>Mr. Glenn McDermot, Lakewood resident, spoke in opposition to the Gravelly Lk Dr SW expansion to the boundary with concerns with increased traffic.</p> <p>Mr. Mark Pfeiffer, Lakewood resident, spoke in opposition to the MFTE incentives and large residential buildings changing the character of the neighborhood.</p> <p>Ms. Nancy Read, Lakewood resident, spoke in opposition to more housing along the Gravelly Lk Dr SW RTA boundary changes causing increased traffic.</p>

Mr. Jason Gano, Lakewood resident, spoke in favor of the proposed changes and the additional incentives of the MFTE's.

Mr. Michael Brandstetter, Lakewood resident, spoke specifically about manufactured homes being allowed in the Springbrook RTA area and their use as a key element in affordable housing and home ownership for lower-income residents.

Mr. Walter Neary, Lakewood resident, spoke in opposition of the Gravelly Lk Dr SW expansion to the RTA boundary suggesting the city thank the small business owners for bringing services to the neighborhood.

Ms. Cindy Neary, Lakewood resident, spoke about the lack of green spaces and parking in the Alliance Development project at the Barnes and Noble Bookstore area behind the AMC Movie Theater on the mall.

Ms. Sandy Gaines, Lakewood resident and President of The Whitman Condominium Community, spoke in opposition to the Gravelly Lk Dr SW RTA expansion and voiced concern that she and other tenants would lose their condominium homes to multifamily buildings if the boundary were changed and the MFTE's allowed.

Ms. Cindy Gardner, Lakewood resident, spoke in opposition to the RTA expansion and suggested a decision be postponed until after the Alliance project was completed to observe if the impact on traffic and to schools is too large.

Ms. Christina Klas, Lakewood resident and local business owner, spoke in opposition to the expansion of the boundary of the Gravelly Lk Dr SW Central Business District noting a concern of too many big box apartment complexes in the neighborhood.

Mr. Dave Iverson, spoke in favor of the Central Business District expansion of the Residential Target Area along Gravelly Lk Dr SW noting he thinks it helps everyone by increasing the MFTE's.

Ms. Adria Buchanan, spoke in support of the MFTE program for the City noting the benefits for the developer and the community by highlighting project feasibility, encourages density in mixed-income housing, supporting work force housing and residents get greater housing choices.

Ms. Christina Manetti, representing the Garry Oak Coalition, spoke in opposition to MFTE Program and the expansion of the RTA along Gravelly Lk Dr SW noting their environmental concerns are about the trees being destroyed or abused among the development. It was suggested to incentivize the protection of the and environment.

Ms. Christina Manetti, Lakewood resident, spoke in opposition to the MFTE program and expansion of the Gravelly Lk SW RTA suggesting there are other suitable areas in the City that should be re-developed and reject the ugly proposals to keep Lakewood nice.

Ms. Stephanie Shinn, Lakewood resident, spoke in opposition to the MFTE program and expansion of the Gravelly Lk Dr SW RTA noting they bought a condominium unit at The Whitman with the intention of renting it below market to give a break to someone who works in the neighborhood. Ms. Shinn suggested there are plenty of units readily available to rent in the City.

Mr. James Dunlop, Lakewood resident, spoke in opposition to the MFTE program and expansion of the Gravelly Lk Dr SW RTA added that residents are not in support of this expansion and suggested the City is doing only what the developers want.

February 10, 2025

Becky Newton
Lakewood City Hall
6000 Main St SW
Lakewood, WA 98499

Re: Proposal to expand the Lakewood Station Residential Target Area (RTA)

To the Economic Development Staff:

The intent of this letter is to request a reevaluation for the current Lakewood Station RTA. By expanding the boundary, there will be more opportunities for redevelopment via the Multifamily Housing Exemption (MFTE) program. This aligns with the inception of [Ordinance No. 751](#), in larger reference to the 2021 Lakewood Station District Subarea Plan.

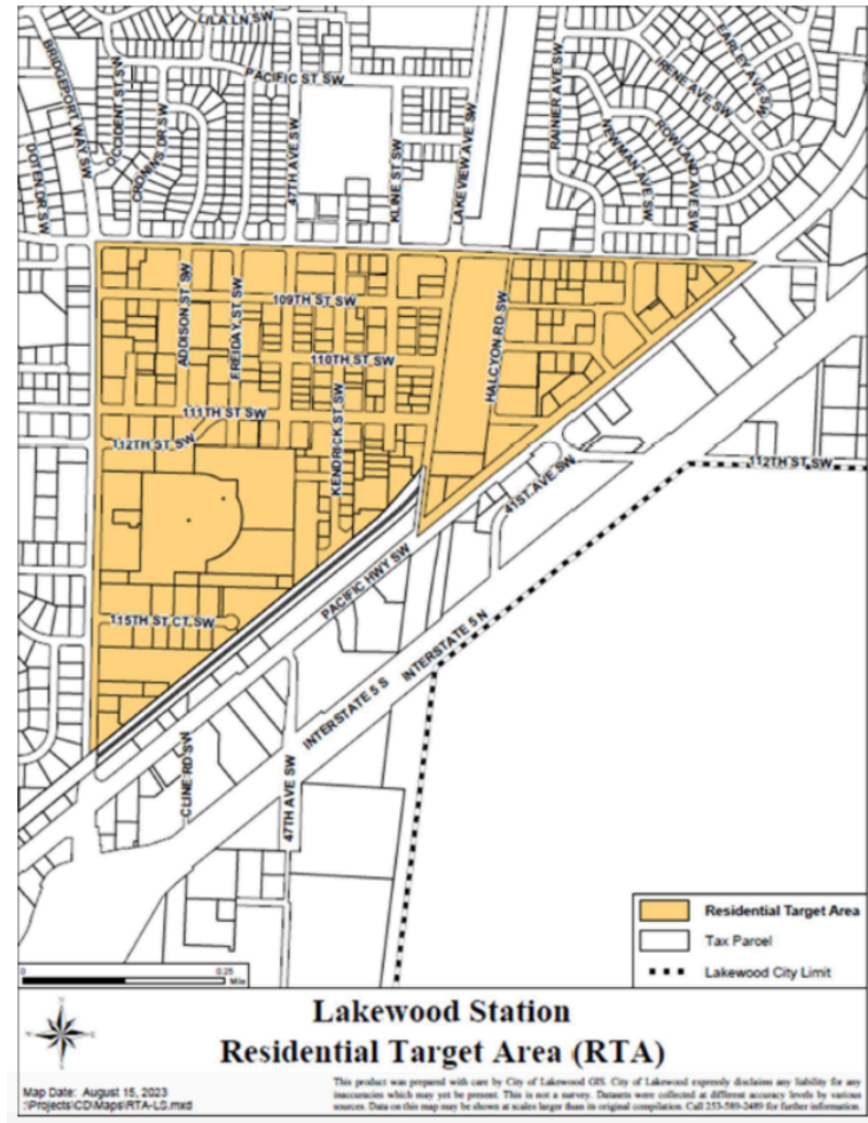
Figure 1: Lakewood Station District Subarea (LSDS)



Under the plan, the housing target is 1,722 net new units, or 17% of the 2044 city-wide target. To do so, the city of Lakewood is encouraging more “middle housing” products within feasible zoning. By adding more opportunities for housing, the city will be closer to achieving its housing goals.

The southernmost boundary line appears to extend to the west of Pacific Hwy SW, not including any parcels that belong to the east of the arterial road. Figure 2 below shows the boundary lines of the Lakewood Station RTA, as designated in Section Lakewood Municipal Code (LMC) 3.64.030.

Figure 2: Lakewood Station RTA



The anchor of this RTA is clearly the Lakewood Station. However, the current RTA boundary excludes vital parcels conducive to pedestrian-accessible transportation from potential housing locations.

Residents located within close proximity to the Lakewood Station are less likely to be auto-dependent and have access to alternative modes of transport- making residential options in these areas more attractive.

According to LMC 18C.600.610.B.4, multifamily properties at market rate that are within 0.25 miles of a Sounder Station may be permitted to allow reduced parking requirements, as justified by a parking study.

If we continue to consider the Lakewood Station as the anchor for this subject RTA, and we extend the boundary lines to a .25 mile radius from the transportation hub, this will incorporate more properties that may become eligible for MFTE, therefore incentivizing development of more housing. Accordingly, this will include additional parcels to the east of Pacific Hwy SW that have access to numerous forms of active transportation, including:

1. Non-motorist facilities:
 - a. Continuous sidewalks exist along the west and east borders of Pacific Hwy SW, providing direct connections to pedestrian infrastructure to Lakewood Station.
 - b. Bike lanes are available along Pacific Hwy SW both north and south of Lakewood Station.
 - c. Marked crosswalks are available on Pacific Hwy SW, providing designated pedestrian phasing at the intersections, facilitating crossing along the roadway to Lakewood Station.
2. Rail service: Sounder Train (S Line)
3. Transit service: Sound Transit, Intercity Transit, and Pierce Transit

Figure 3: Access to the Lakewood Station



The City of Lakewood is incentivized to optimize the existing non-motorist infrastructure and future plans of building a pedestrian-friendly environment, by promoting more Transit Oriented Developments (TOD) near Lakewood Station, as residents are encouraged to use mass transit options.

The City of Lakewood's commitment to increase housing is ambitious, and requires consideration of all possible opportunities. It makes sense to take advantage of existing resources, such as pedestrian infrastructure, to facilitate the growth of more concentrated multifamily housing within the Transit Oriented Commercial (TOC) zoning. By not expanding the Lakewood Station RTA, developers are disincentivized from building or rehabbing housing and the TOC zoning will miss out on beneficial opportunities.

I look forward to discussing this proposal with the Economic Development staff and hope that there will be serious consideration.

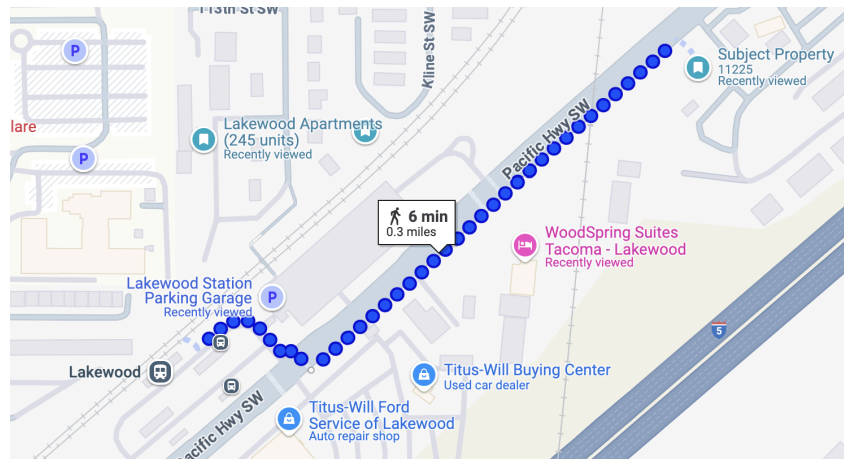
Thank you for considering this request,

Taylor Lee

Email: tlee324@gmail.com

Direct: 425-770-2205

P.S. My mother owns a property located at 11225 Pacific Hwy SW. This property is located .25 miles from the Lakewood Station, and there is a designated pedestrian pathway leading to it. There used to be a small office-use building on site, but during the pandemic, the property experienced issues with trespassing and vandalism. As a result, we made the difficult decision to demolish the building. Thereafter, she worked on a plan for a 14-unit apartment building. We had facilitated a pre-application meeting with the City, and feedback was positive. However, due to project cost limitations, we have since stalled the project. By having her property be included in the RTA, and therefore be eligible for MFTE, this would remove a financial barrier and consequently attract banks, investors or developers to pursue this project.



Topic	Number of Comments*	Summary of Comments	Staff Response
Opposition to RTA Expansion in Established Neighborhoods	12	Many residents oppose the expansion into existing neighborhoods, fearing loss of character, increased density, and a shift away from single-family home areas.	The MFTE addresses concerns by aligning with the city's comprehensive plan, as well as abiding by all land use, zoning, and code regulations. The Downtown calls for a significant increase in housing density. The city has extensively planned for future growth and developed subareas in the Downtown and Lakewood Station District to address the character and design of the areas.
Traffic and Infrastructure Concerns	10	Concerns about increased congestion, lack of adequate roads, and strain on public infrastructure in areas like Gravelly Lake Drive.	Lakewood conducts and follows a six-year transportation improvement plan. Capital projects, including infrastructure improvements and plans are found here: https://cityoflakewood.us/capital-projects/ . The Downtown has a traffic mitigation fee for more intensive uses. Lakewood tracks traffic volumes and requires traffic trip generation for projects.

<p>Alternative Development Locations Suggested</p>	<p>9</p>	<p>Alternative sites suggested for development, including Bridgeport Way, Pacific Highway, and existing vacant commercial properties.</p>	<p>CBD is a regional center for growth with the primary density and subarea detailing design standards is recommended. Other areas: Bridgeport Way, mostly outside of the CBD would not have the same design and subarea requirements and may have some commercial displacement, if mixed use not implemented. Pacific Highway suggested by commenter and would be a small add to Lakewood Station District RTA, could present commercial displacement if no mixed use incorporated. Existing vacant commercial properties as a general suggestion would not be recommended unless it is connected to a subarea or makes sense for encouraging housing. Oakbrook has commercial displacement potential. Springbrook has concerns about the walkability, displacement, and flood plain although there is a significant MFTE project built there. Tillicum concerns include displacement of residents and commercial, and this is a very low income area.</p>
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<p>Concerns About Tax Exemptions for Developers</p>	<p>8</p>	<p>Opposition to tax exemptions that primarily benefit developers, with concerns that local taxpayers will bear the burden of infrastructure costs.</p>	<p>The property owner in Lakewood receives the tax exemption for 8 years or 12 years (if 20% affordable units set aside). The property owner is often also the developer. The tax exemption is a deferral of property taxes on the value of new or rehabilitated housing that would not otherwise exist if not for the new or rehabilitated housing. In other words the tax property tax did not exist prior to the development. Also, significant taxes on construction are collected while project is being built. SEE EXAMPLE THAT FOLLOWS. Once the exemption expires all taxing jurisdictions, including Lakewood collect the increased property tax amount. 55 cities in Washington state offer the MFTE. Lakewood had just 249 projects built as of 2023 as compared to Tacoma at 1,938 and Shoreline at 1,123. Seattle represents 53% of MFTE projects.</p>
<p>Public Safety Concerns</p>	<p>7</p>	<p>Concerns about crime, pedestrian safety, particularly in school zones, and increased traffic-related accidents.</p>	<p>Lakewood Police Department is leading the way in Washington state. Crime is down across the board in 2024 as compared to 2023. As of Q3 2024 burglary -18.9%, Fraus -10.6%, Larceny -12.1%, Motor Vehicle Theft -67.5%, Stolen Property -23.9%, Vandalism -33.7%, Weapons Violation -25%. https://cityoflakewood.us/police-homepage/crime-statistics/. Safety measure include a focused retail watch program with officers on site, and an extensive flock camera system at all entrances to the city and within the city, particularly around Lakewood Towne Center. Traffic calming is part of the Downtown subarea plan along Gravelly Lake Drive, including expanded walkable areas and landscaping.</p>

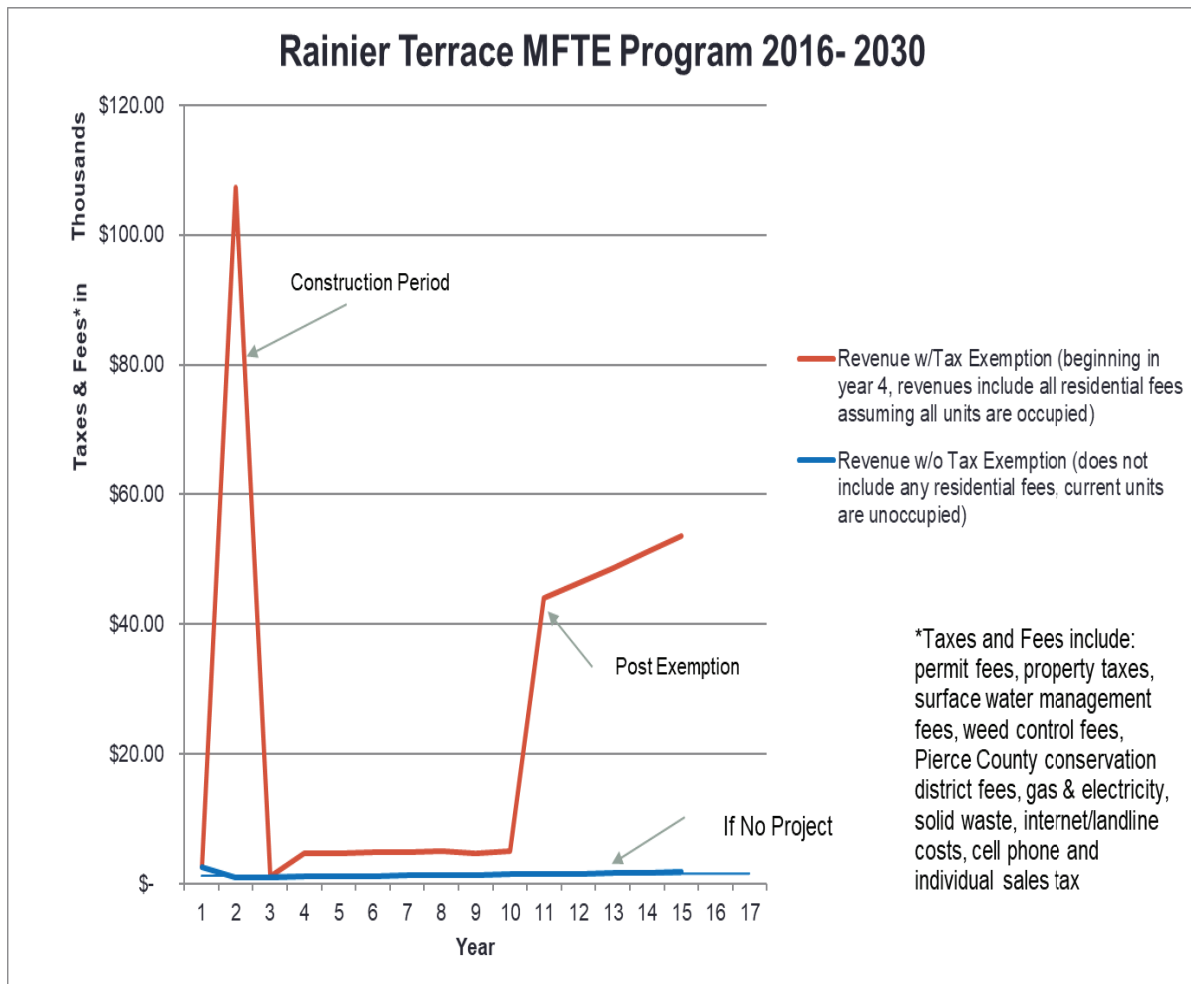
Environmental Concerns	6	Environmental concerns regarding tree removal, impact on local wildlife, and potential ecological damage from increased development.	Environmental impacts have been extensively studied. View documents here: https://cityoflakewood.us/planning-documents/ Lakewood has a comprehensive tree preservation plan aimed at protecting its urban forest and achieving a 40% tree canopy cover by 2050. https://cityoflakewood.us/trees/ . The environment is protected through critical areas mitigation with shoreline management and restoration goals. https://lakewood.municipal.codes/LMC/14.142.135
Pause for Further Study	6	Some residents suggest pausing expansion until after major projects, like the Alliance project, are completed and evaluated for impact.	Could consider pausing or a phased approach and delay in decision-making to assess current development impacts. Consider requirements for the Regional Center, pace and momentum of development as well as potential pending projects. Market conditions drive development.
Support for MFTE & RTA Expansion	5	Some residents and developers support the MFTE program and RTA expansion, citing increased housing supply, economic benefits, and support for workforce housing.	We appreciate your support of the program. MFTE is a significant economic development tool to promote investment, recovery, and create family-wage jobs. It helps to achieve development densities that are more conducive to transit use, and encourages additional housing of all types, including permanently affordable housing and market-rate housing. MFTE stimulates new construction or rehabilitation of vacant and underutilized buildings for multifamily housing. Lakewood offers 8-year market rate and 12-year if 20% is set aside as affordable.

<p>Impact on Small Businesses</p>	<p>5</p>	<p>Opposition from small business owners who fear displacement and loss of commercial vibrancy in areas slated for multifamily development.</p>	<p>The economic development division of Planning and Public works has a comprehensive business retention and expansion program. Outreach is conducted annually to more than 100 businesses, with additional outreach in partnership with the County, EDB, Lakewood Chamber and others. The division has ongoing retention cases, conducts surveys, prepares a variety of reports, provides resources and connection to all business resources, manages business licensing, and produces data as needed. The team provides relocation assistance. There is a goal to help create over 7,000 jobs in Lakewood. More housing density provides built-in shopping and patrons of businesses for mixed use areas in particular. MFTE encourages housing growth sooner rather than later that will support small businesses and fill empty retail spaces.</p>
<p>Need for Better Public Communication & Education</p>	<p>5</p>	<p>Residents feel the city has not adequately communicated details about the MFTE program, its benefits, and its impact on taxpayers.</p>	<p>Lakewood is committed to increasing transparency through its robust communications department with the City Manager Bulletin, online news, social media, and increasing neighborhood meetings and events where public engagement is encouraged. The MFTE has been discussed at neighborhood meetings and is documented on the website. The RTA potential for expansion was noticed to all proposed areas and within 300 feet of the borders of those areas. Staff members are available to provide answers to questions on MFTE and are striving to continually improve the program and messaging.</p>

<p>Need for Mixed-Use Development</p>	<p>4</p>	<p>Desire for mixed-use development rather than large-scale apartment complexes; calls for requiring commercial space in new developments.</p>	<p>Mixed use is currently required on 35% of the ground floor of residential projects (horizontal or verticle) in the Downtown within the Town Center and Colonial Center overlays. No developer is able to meet this requirement at this time and there is no value given within a project for commercial space. Challenges include complexity in planning and design, higher development costs, operational management challenges, market volatility, and unique traffic considerations. The MFTE helps to offset these challenges. However, requiring mixed use is a non-starter and causes developers to walk away.</p>
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**A total of 34 unique commenters provided feedback on this proposal.*

Property Tax Exemption Project Example: Represents an actual project



Planning Commission March 5 Discussion Recap

Commissioner Herr: Suggest tabling Gravelly Lake discussion until mixed use is addressed/defined.

Commissioner Estrada: Misunderstanding by the public about MFTE as MFTE does not change zoning. Uses are already allowed. Sentiment by public as to “not in my backyard”. Concern as to no comment about areas besides CBD. *Ms. Speir noted that extensive noticing has occurred.*

Commissioner Larsen: Gravelly is not problematic. In Fircrest where mixed use was required it killed the deal. MFTE is a way to incentivize mixed use.

Commissioner Wallace: Incentivize mixed use.

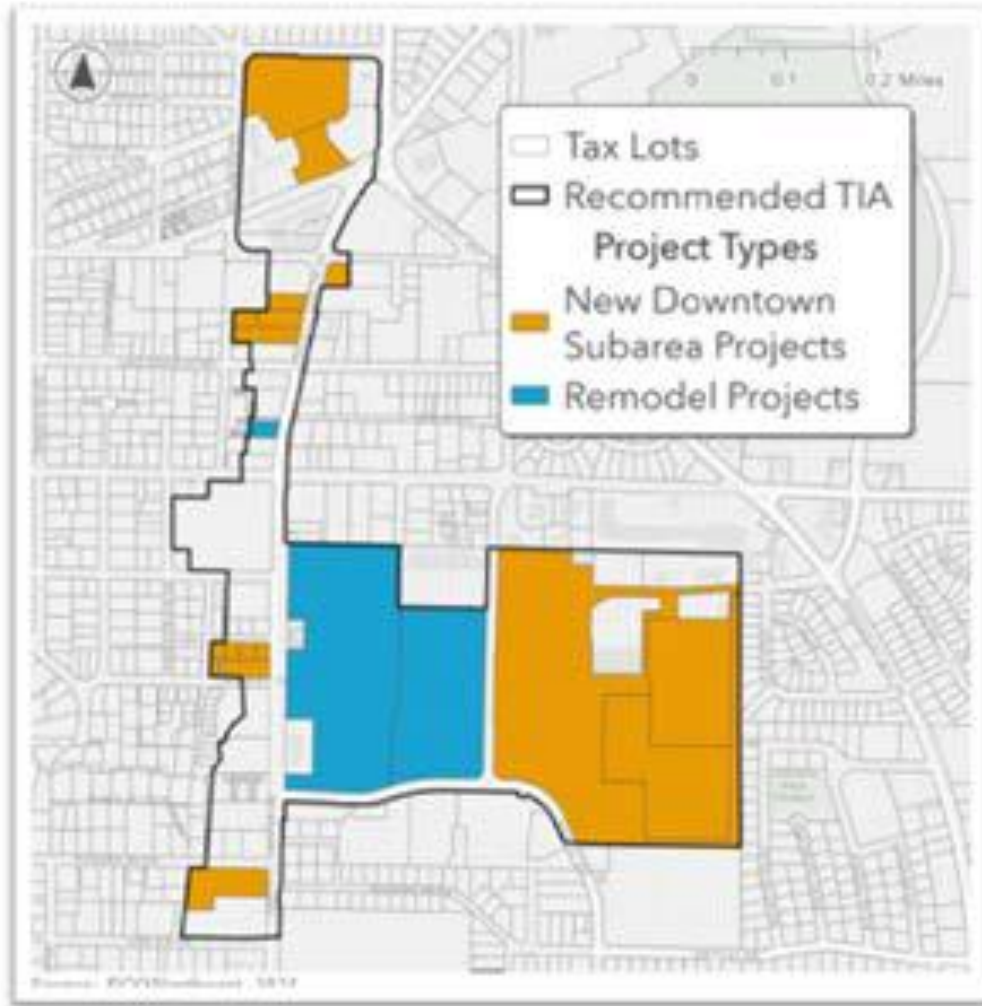
Commissioner Talbo: Urges more community stakeholder input for Downtown. Agree with Commission Herr. Development should pay for impacts.

Ms. Speir noted Traffic Mitigation Fee now has a one-year limit on previous uses, and that RTAs pre-date subareas. Ms. Speir also noted that through subarea reviews only one change has been made which was to add parcels. Additionally, subareas may not be reviewed until mid-2026 or later.

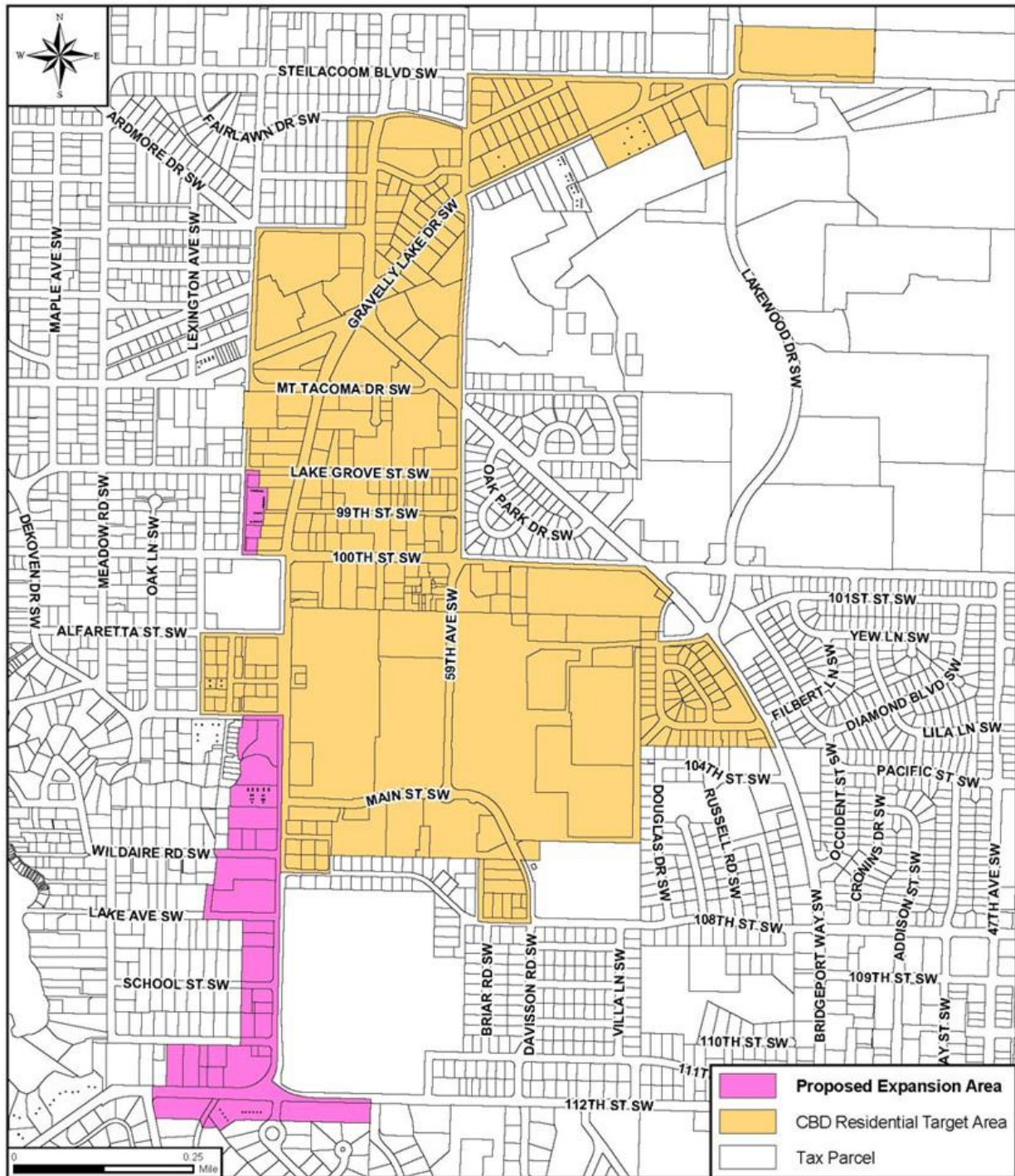
Chair Combs: Advocate for development. RTA does work and needs to be customized for our community. Commercial is not viable. Could be years if put on hold. Regional Center is happening now.

Discussion around the 12-year extension with various opinions from low harm and good for all to not believable as to no harm and opposition citing extensive requirements and not in favor due to developer already receiving benefit for building in Lakewood.

Maps



Tax Increment Finance Area within the Central Business District



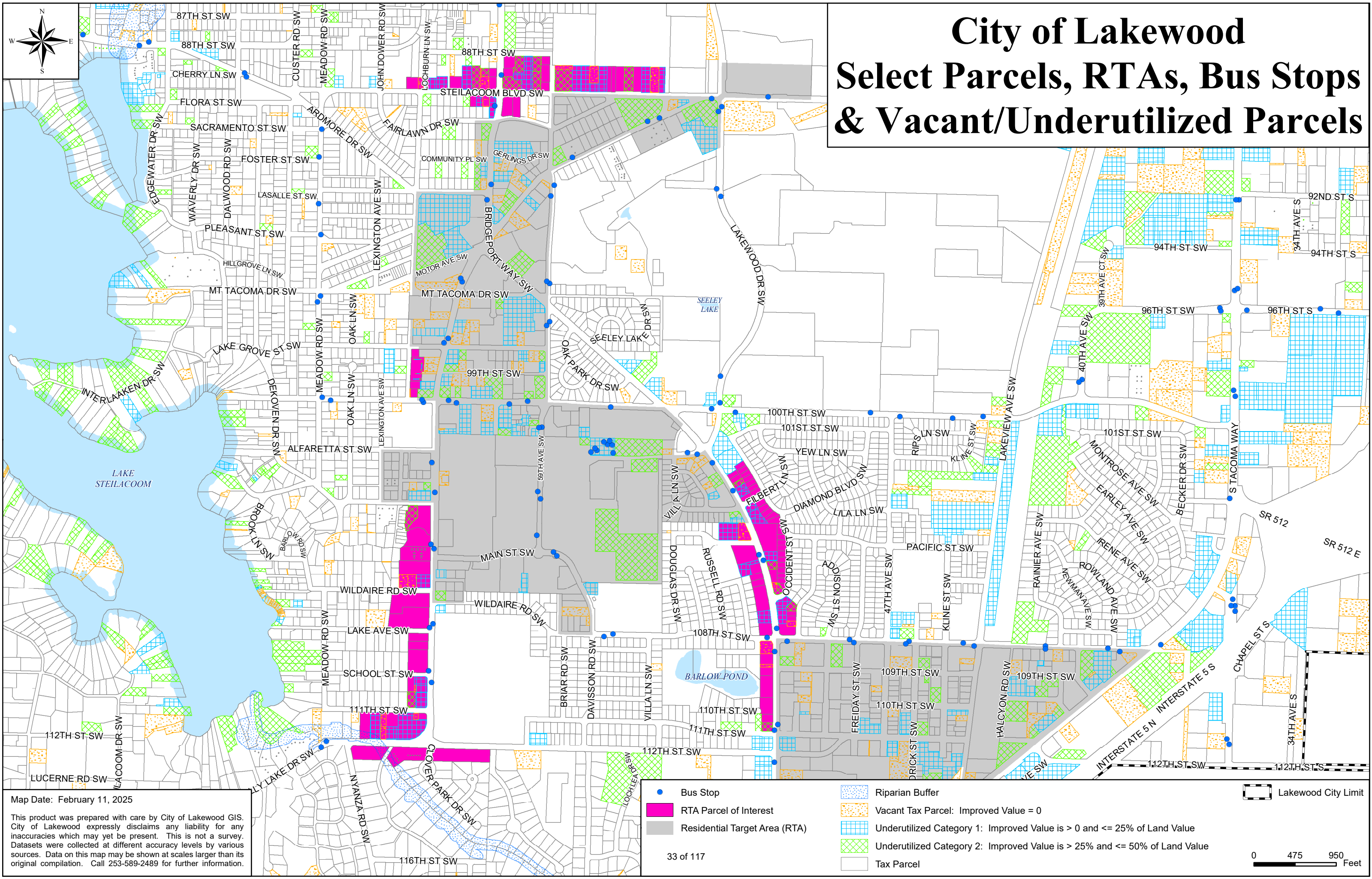
Central Business District Residential Target Area (RTA) Proposed Expansion

Map Date: November 08, 2023
 :Projects\CD\Maps\RTA-CBD-PrExp.mxd

This product was prepared with care by City of Lakewood GIS. City of Lakewood expressly disclaims any liability for any inaccuracies which may yet be present. This is not a survey. Datasets were collected at different accuracy levels by various sources. Data on this map may be shown at scales larger than its original compilation. Call 253-589-2489 for further information.

City of Lakewood

Select Parcels, RTAs, Bus Stops & Vacant/Underutilized Parcels



Map Date: February 11, 2025

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● Bus Stop	▨ Riparian Buffer
▨ RTA Parcel of Interest	▨ Vacant Tax Parcel: Improved Value = 0
▨ Residential Target Area (RTA)	▨ Underutilized Category 1: Improved Value is > 0 and <= 25% of Land Value
33 of 117	▨ Underutilized Category 2: Improved Value is > 25% and <= 50% of Land Value
	▨ Tax Parcel

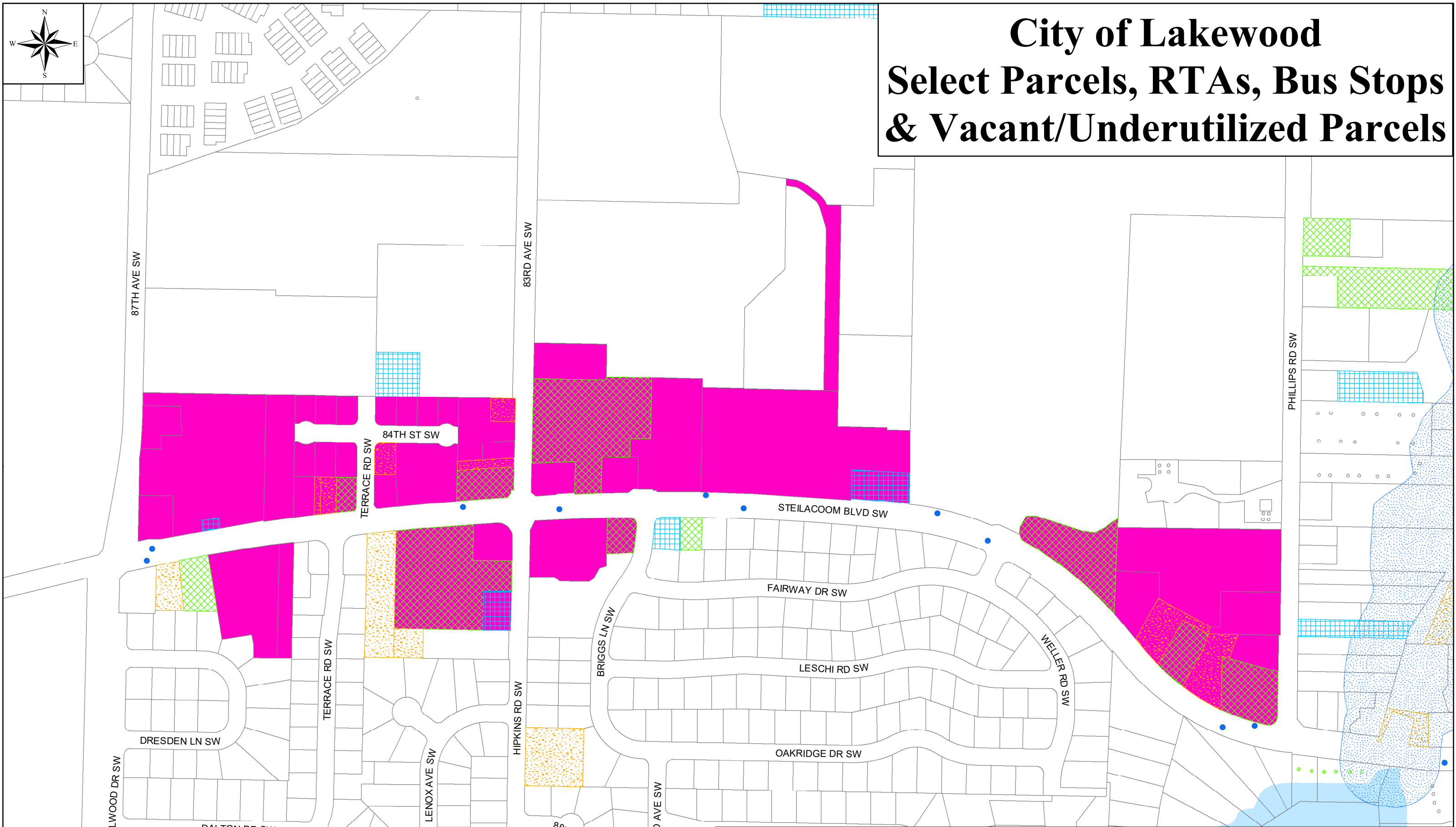
Lakewood City Limit

0 475 950
 Feet



City of Lakewood

Select Parcels, RTAs, Bus Stops & Vacant/Underutilized Parcels



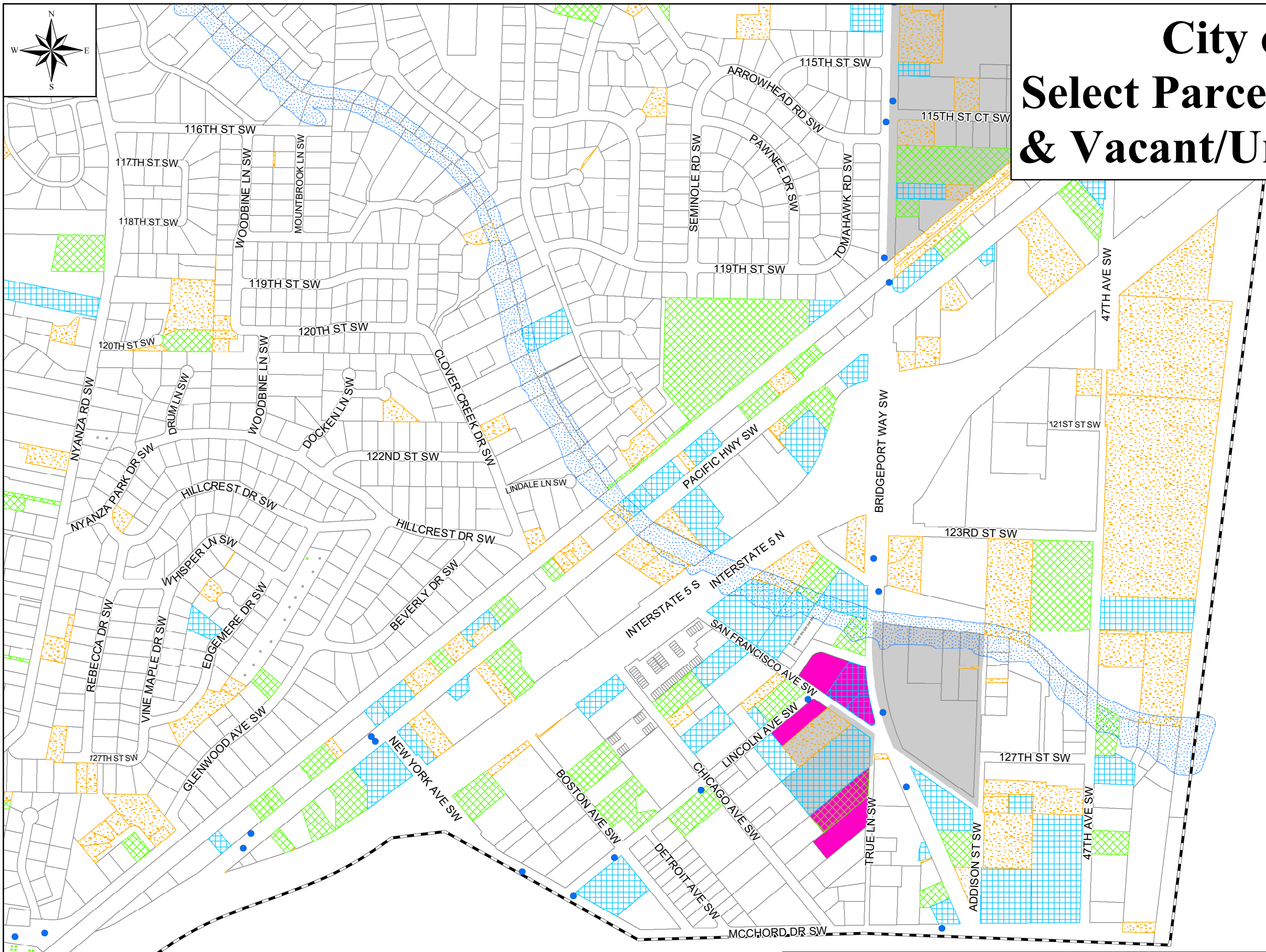
Map Date: February 11, 2025

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Bus Stop	Riparian Buffer	Lakewood City Limit
RTA Parcel of Interest	Vacant Tax Parcel: Improved Value = 0	0 200 400 Feet
	Underutilized Category 1: Improved Value is > 0 and <= 25% of Land Value	
	Underutilized Category 2: Improved Value is > 25% and <= 50% of Land Value	
	Tax Parcel	

City of Lakewood

Select Parcels, RTAs, Bus Stops & Vacant/Underutilized Parcels



Map Date: February 11, 2025

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● Bus Stop	▨ Riparian Buffer
▨ RTA Parcel of Interest	▨ Vacant Tax Parcel: Improved Value = 0
▨ Residential Target Area (RTA)	▨ Underutilized Category 1: Improved Value is > 0 and <= 25% of Land Value
35 of 117	▨ Underutilized Category 2: Improved Value is > 25% and <= 50% of Land Value
	▨ Tax Parcel

Lakewood City Limit
 0 300 600 Feet



TO: Planning Commission
FROM: Tiffany Speir, Planning Division Manager
DATE: March 19, 2025
SUBJECT: Proposed 2025 Comprehensive Plan Amendments (continued)

DISCUSSION

Lakewood’s Municipal Code describes the process to be used to review proposed Comprehensive Plan Map and Text amendments in LMC Chapter 18A.30. The Planning and Public Works Department (PPW) has complied with this process.

PPW introduced proposed amendments 2025-01, -04, -05, -06, -07, -08, -10, and -12 on to the Planning Commission on March 5. This memorandum introduces the following amendments for Commission consideration:

- 2025-02** Updates to Comprehensive Plan Capital Facilities Element, Parks Element, and Utilities Element for consistency with E2SHB 1181 (Climate Change & Resiliency)
- 2025-03** Updates to Lakewood development regulations regarding “middle housing” for consistency with E2SHB 1110
- 2025-09** Review, and if needed, amend, the Lakewood Regional Urban Growth Center (RUGC)’s implementation through the Downtown Subarea Plan (DSAP) for consistency with PSRC’s Regional Centers Framework Redesignation Requirements.
- 2025-11** Review LMC 18A.40.110 (B)(1)(e) to consider amending the minimum square footage for accessory dwelling units (ADUs.)

The Planning Commission will hold a public hearing on all of the draft amendments on April 2 and is scheduled to take action on a recommendation to the City Council on April 16.

Note: The content of all of the draft amendments are subject to change before the April 2 hearing.

2025-02 Updates to Comprehensive Plan Capital Facilities Element, Parks Element, and Utilities Element for consistency with E2SHB 1181 (Climate Change & Resiliency Statutory Updates)

E2SHB 1181 amended the GMA, SEPA, and other statutes¹ that add significant new requirements for Lakewood's Comprehensive Plan and development regulations that must be adopted by 2029, including:

- supporting state greenhouse gas (GHG) emissions reduction goals and per-capita vehicle miles traveled (VMT); and
- fostering resiliency to climate impacts and natural hazards, among other requirements.

Lakewood's Comprehensive Plan **Goal 15.3.1 on Consistency** directs that the Plan be updated regularly to comply with the Growth Management Act (GMA), PSRC Multicounty Planning Policies (MPPs), and Pierce County Countywide Planning Policies (CPPs). Lakewood is complying in part with E2SHB 1181's updates to the GMA in 2025 through determining whether amendments are needed to the following Comprehensive Plan elements:

- The Parks, Recreation, and Open Space Element (PROSE) must include a tree canopy evaluation.
- The Utilities Element (UE) must include the general location, proposed location, and capacity of all existing and proposed utilities, including electrical, telecommunications, and natural gas systems.
- The Capital Facilities Element (CFE) must include an inventory of existing capital facilities owned by public entities to include green infrastructure.

The full E2SHB 1181 consistency review conducted of Lakewood's current PRE, UE, and CFE follows the review text below. **Per the analysis, no amendments are recommended under 2025-02.**

2025-02 Analysis per LMC 18A.30.050 (B)

1. Does the proposed amendment or revision maintain consistency with other plan elements or development regulations? If not, are amendments or revisions to other plan elements or regulations necessary to maintain consistency with the current final docket that will be considered by the Planning Commission and the City Council? **N/A.**
2. Is the proposed amendment or rezone consistent with the goals of the Comprehensive Plan? **N/A.**
3. Is the proposed amendment or revision consistent with the county-wide planning policies? **N/A.**
4. Does the proposed amendment or rezone comply with the requirements of the GMA? **N/A.**

¹ RCW Chapters 36.70A, 43.21C, 43.20, 47.80, 70A.45, 70A.125, 86.12, and 90.58

2025-02 SEPA Analysis

1. Is the proposed amendment consistent with the county-wide planning policies, the Growth Management Act (GMA), other state or federal law, or the Washington Administrative Code? **N/A.**

2. Would the proposed amendment have little or no adverse environmental impacts and is the time required to analyze impacts available within the time frame of the standard annual review process? **N/A.**

3. Is sufficient analysis completed to determine any need for additional capital improvements and revenues to maintain level-of-service, and is the time required for this analysis available within the time frame for this annual review process? **N/A.**

4. Can the proposed amendment be considered now without conflicting with some other Comprehensive Plan established timeline? **N/A.**

5. Can the proposed amendment be acted on without significant other amendments or revisions not anticipated by the proponents and is the time required for processing those amendments or revisions available within the time frame of this annual review process? **N/A.**

6. If the proposed amendment was previously reviewed, ruled upon or rejected, has the applicant identified reasons to review the proposed amendment again? **N/A.**

PPW RECOMMENDATION: The PPW recommends no action under Amendment 2025-02.



Memo of Consistency
and Integration
Lakewood, WA
Comprehensive Plan



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Background

This Memo of Consistency and Integration (Memo) describes the City of Lakewood's process for drafting Comprehensive Plan policies and development regulation amendments to implement E2SHB 1181 to support the integration of new **Growth Management Act (GMA)** requirements of **House Bill (HB) 1181** into the City's Comprehensive Plan update.

Lakewood's Comprehensive Plan Update and HB 1181 Requirement

Every ten years, the City of Lakewood is required by the State of Washington (WA) to conduct a periodic update of its **Comprehensive Plan** and related development regulations to comply with the requirements of the State's GMA. The Comprehensive Plan lays out the City's vision for decisions and investments related to housing and land use, local job creation, transportation and mobility, utilities, parks, and other public assets over a 20-year period. The Plan serves as a roadmap for future growth and services in the City, and affects neighborhoods, businesses, transportation, public facilities and services, and the environment.

In May 2023, Washington State Governor Jay Inslee signed HB 1181, which added a Climate Element requirement to the GMA. The **Climate Commitment Act (CCA)** and **Senate Bill (SB) 5187** have made **\$30 million** available statewide for grants to support these efforts.



[HB 1181](#) makes significant changes to the [Growth Management Act](#) (GMA) to incorporate climate change into local government comprehensive plans.

HB 1181 adds a GMA climate change and resiliency goal to: ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and chapter 47.80 RCW:

1. adapt to and mitigate the effects of a changing climate;
2. support reductions in greenhouse gas emissions and per capita vehicle miles traveled;
3. prepare for climate impact scenarios;
4. foster resiliency to climate impacts and natural hazards;
5. protect and enhance environmental, economic, and human health and safety; and
6. advance environmental justice.

Organizing the Climate Element for Integration and Consistency

Each jurisdiction's development regulations, planning activities, and capital budget decisions must be consistent with and implement the comprehensive plan. The GMA requires that all comprehensive plans be internally and externally consistent. ([RCW 36.70A.130\(1\)\(d\)](#))

Internal consistency means that all goals and/or policies must be based on the same future land use map designations and population projections. Internal consistency also requires reviewing your plan and addressing goals and policies that conflict with or create barriers to implementing other measures. Internal consistency also typically encompasses your other adopted plans or development regulations. External consistency means that the local comprehensive plan must be consistent with [countywide planning policies \(CPPs\)](#) and [regional transportation plans \(RTPs\)](#) and be coordinated with comprehensive plans of adjacent cities and counties.

- alignment with the comprehensive plan's other measures;
- alignment with the comprehensive plan's vision;
- alignment with countywide planning policies and regional transportation plan measures; and,
- alignment with GMA goals for climate, transportation, housing, and other applicable areas (11 sectors)

Source: Washington State Department of Commerce's [Climate Element Planning Guidance](#)

Lakewood’s **Goal 15.3.1 on Consistency** ensures that the plan complies with state, regional, and county requirements, specifically the Growth Management Act (GMA), PSRC Multicounty Planning Policies (MPPs), and Pierce County Countywide Planning Policies (CPPs).

All **15 elements** of Lakewood’s Comprehensive Plan must be consistent with each other and with the Municipal Code, and the plan must be coordinated with the plans of adjacent jurisdictions. This first step was part of a 3-phase process, where the focus was on **3 elements**.

- Update **Parks & Recreation Element** to include a tree canopy evaluation.
- Update the **Utilities Element** to include the general location, proposed location, and capacity of all existing and proposed utilities, including electrical, telecommunications, and natural gas systems.
- Update the **Capital Facilities Element** inventory of existing capital facilities owned by public entities to include green infrastructure.

The 3 Elements will be reviewed in terms of alignment with the City’s future Climate Element (CE), which will consist of two sub-elements:

- a **Greenhouse Gas (GHG) Reduction Sub-element**,¹ which will address baseline conditions (i.e., offer an inventory of community-wide GHG emissions) and planned policies and strategies to reduce GHG emissions and vehicle miles traveled (VMT) per capita across Lakewood; and
- a **Climate Resilience Sub-element**,² which will address baseline conditions and planned policies and strategies related to Lakewood’s sensitivity, exposure, and adaptive capacity to climate hazards, which will include science-based goals and policies that address local community hazards and include natural areas to foster resiliency and protect vital habitat for species migration.

Optional language to align with these sub-elements will be proposed for consideration. The completed evaluation will be appended to the corresponding Elements in compliance with GMA requirements.

¹ Greenhouse gases, [as defined by the U.S. Environmental Protection Agency](#), are “gases that trap heat in the atmosphere.”

² Climate resilience, [as defined by the State of Washington](#), is “the ongoing process of anticipating, preparing for, and adapting to changes in climate and minimizing negative impacts to our natural systems, infrastructure, and communities.”

This Memo documents how the requirements of HB 1181 were met in a way which will ensure that **climate mitigation and resilience** are at the core of the City’s planning agenda, while addressing the complex challenges to future development posed by climate hazards. The comprehensive approach integrates robust data collection, equitable community engagement, and forward-looking policy creation to create a sustainable framework for building climate resilience in Lakewood. This methodology is structured to ensure alignment with the City’s existing plans and goals, including the 2024 Comprehensive Plan Update, Pierce County’s goals and policies, and the state-mandated requirements of HB 1181.

Existing Lakewood Goals for Energy and Climate Change

- Provide Leadership in Managing Climate Change
- Improve Clean and Efficient Transportation Options
- Increase Sustainable and Energy-Efficient Systems
- Encourage Sustainable Development
- Develop a Hazards Management Plan

Overarching Themes for Lakewood’s Comprehensive Plan Update

Balancing Growth and Preservation: Lakewood is working to balance the unique community needs with the demands of growth and modernization.

Community Focus: There's a strong emphasis on building a sense of community and creating equitable and inclusive spaces.

Interconnectedness: The plan emphasizes that all elements—parks, utilities, transportation—are interconnected.

Forward-Thinking: The plan is proactive and long-term focused



Parks, Recreation, and Open Space Element

- **HB 1181 requirements have been satisfied. Lakewood's Parks, Recreation, and Open Space Element is in compliance.**

Lakewood recognizes the benefits that all enjoy from parks and open space and has prioritized parks and open space in their comprehensive plan. There is a citywide tree canopy goal of 40% by 2050.

Changes resulting from HB 1181 related to parks and recreation include:

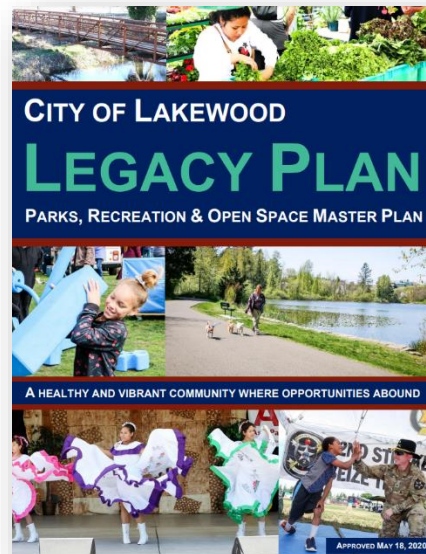
- New requirement for an evaluation of **tree canopy** coverage within the **urban growth area (UGA)**
- **Open space and recreation goals:** HB 1181 amends the open space and recreation goal to state: Retain open space "and green space," enhance recreational opportunities, "enhance" fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.
- **Citizen participation and coordination goal:** Encourage involvement of citizens in the planning process, "including the participation of vulnerable populations and overburdened communities," and ensure coordination between communities and jurisdictions to reconcile conflicts.

Chapter 9: Parks, Recreation, and Open Space (PROS) has 4 themes:

1. **Access** means that parks should be accessible to everyone, regardless of location or transportation.
2. **Equity** is about ensuring parks meet everyone’s needs and abilities.
3. **Experience** focuses on creating engaging and enjoyable spaces.
4. **Connectivity** aims to link parks and neighborhoods together.

The [Parks Legacy Plan](#) (Legacy Plan) serves as a detailed guide for park development, recreation, and open space management, while the PROS Element integrates these goals into the broader city planning framework.

The Legacy Plan and the Parks Capital Improvement Plan help to implement the City Council’s Strategic Plan. The inventory, implementation strategies, and capital facilities planning aspects of the Legacy Plan are referenced and incorporated into the PROS Element. Capital expenditures are included in the Comprehensive Plan Capital Facilities Plan Element materials in the Appendix. The Comprehensive Plan directs that the Legacy Plan should be updated every 6 years to remain eligible for RCO (Recreation and Conservation Office) funding.

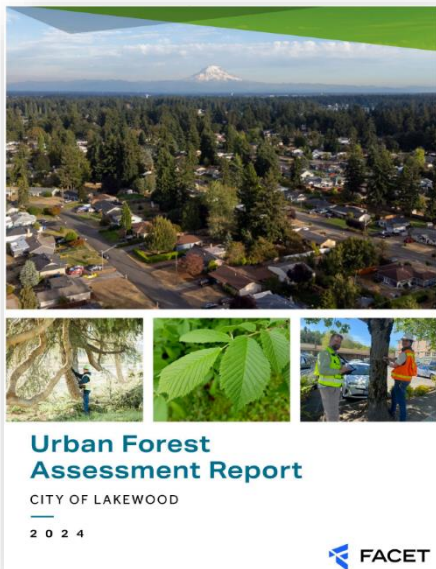


Placeholder for Davey review of Lakewood Urban Forest Assessment Report 2024 – this will be used to update Parks & Recreation Element to include a tree canopy evaluation

The urban tree canopy assessment determined a citywide canopy cover estimate of 24.4% for the 2020 evaluation year. Canopy cover is reported for census block groups, land use zones, and select large individual properties. In addition to canopy cover, the assessment included an analysis of plantable area conducted at two scales:

- 1) the contextual level (among census blocks and land use zones) and
- 2) the site level, providing operational support to Lakewood by assessing plantable areas on city-managed lands.

Together they provide data to evaluate the opportunity for additional tree planting and tree canopy recovery.



The 2024 field tree inventory assessed 11,782 trees within **public rights-of-way, city-owned parks, public schools, and other select public institutional grounds**. Results show a public tree population that includes 161 species characterized by a mixture of ornamentally introduced tree varieties and trees native to the Pacific Northwest. The most abundant tree species are Douglas-fir (*Pseudotsuga menziesii*), Oregon white oak (*Quercus garryana*), Norway maple (*Acer platanoides*), cherry plum (*Prunus cerasifera*), and red maple (*Acer rubrum*), which together make up 54% of all inventoried trees.

Historical Context and Planning:

- Lakewood adopted its first Parks and Recreation Master Plan in 1998, which included priorities such as acquiring future park and open space sites, upgrading existing park sites, and preserving natural open space.
- A new Parks and Recreation Master Plan was adopted in 2005, leading to the expansion of the recreation division, new partnerships, citizen advisory boards, new parks, a senior activity center, and park improvements.

- The Parks Legacy Plan was created over a three-year period with public engagement, culminating in the 2014 plan to meet the State of Washington’s requirement for a 6-year parks, recreation, and open space plan.
- Throughout the update process, the Legacy Plan Task Force (LPTF) met once a month to provide guidance on the update.
- In 2019, the city updated the Parks Legacy Plan with outreach, engagement, and analysis of needs, including a review of environments, trends, and community input. The Parks Legacy Plan update was adopted in 2020.

The city collaborates with many partners to manage and develop park resources. The Parks, Recreation and Community Services Department (PRCS) collaborates with public, private, and non-profit agencies to manage park resources, plan programs and events, deliver activities, market programs, or share facilities. There are plans for improvements and expansions of park systems, with projects like the [Wards Lake Park improvements](#) and Relocation of the [Tenzler Log](#) (“The Big One”).

Other park projects planned for 2025:

- **Primley Park playground replacement:** The City is planning a community work day to help install the surfacing for the playground in March. A save the date notice with details about that effort will be shared with neighbors to gain volunteers.
- **Oakbrook Park:** A new picnic shelter is on order and design is ongoing for a trail inside the park perimeter that will be installed before the busy summer season.
- **New park signs:** Park signs will be replaced this year with updated designs. Expect the signs in place by summer.
- **Historic H-Barn revitalization:** Grants and community funding continues to come in to support the preservation of the H-barn at Fort Steilacoom Park. Local nonprofit Partners for Parks is working to raise \$3.5 million to match a \$4 million commitment from the city. Design work will start in early spring to determine building and code needs, as well as cost estimates.

- **Street End pilot project:** The Parks and Recreation Advisory Board will host a community meeting in early March to look at how to create a new public open space at the Westlake Ave Street End on Lake Steilacoom.
- **Harry Todd pickleball courts:** Four new pickleball courts will be developed at Harry Todd Park this year. The city has submitted permits for this work. The courts should be available for public use by fall 2025.
- **Nisqually Loop Trail Fort Steilacoom Park:** In partnership with the Nisqually Tribe the city will install several interpretive exhibits along the Nisqually Loop Trail in the southeast area of the park. The exhibits will be located along a 1-mile trail and include Nisqually art, educational information and Lushootseed language. Construction is anticipated to occur late summer-fall of 2025.



Utilities Element

- **HB 1181 requirements have been satisfied. Lakewood's Utilities Element is in compliance.**

New Requirement(s) under 2023 legislative amendment of the GMA:

- *Utilities Element must include the location and capacity of "telecommunications" and natural gas "systems."*
- *Requires that the jurisdiction "identify all public entities that own utility systems and endeavor in good faith to work with other public entities" to gather and include within its element the information required.*

Analysts reviewed the utilities list to ensure that it includes the general location, proposed location, and capacity of all existing and proposed utilities, including electrical, telecommunications, and natural gas systems. As these lists were factchecked and confirmed, analysts updated and edited them to make sure they were as specific as possible (See Appendix A – *in development*).

Element Overview The purpose of the Utilities Element is to ensure that:

- Adequate utilities are available,
- Equitable Level of Service (LOS) for services are provided across the City;
- Public health and safety are guaranteed;
- Efficiencies and economies of scale are utilized, and
- Coordination is successfully achieved with regional and independent utility providers.

Lakewood does not own or operate its sewer, water, power, refuse, or telecommunication utilities. Instead, it has agreements with external entities.

Chapter 14: Utilities lists the major independent utility services provided in Lakewood as:

1. **Sanitary Sewer:** Primarily provided by Pierce County Public Works and Utilities, with some service by the Town of Steilacoom (to Western State Hospital) and the City of Tacoma (to the Flett subdivision and some commercial/residential users in northeast Lakewood).
2. **Water:** Provided by Lakewood Water District and Parkland Water District.
3. **Electricity:** Provided by Tacoma Power, Puget Sound Energy (PSE), and Lakeview Power.
4. **Natural Gas:** PSE is an exclusive provider.
5. **Telecommunications:** Provided by private communications companies.
6. **Solid Waste:** Waste Connections is the service provider.

The city aims to coordinate with regional and independent providers to ensure adequate service levels, public safety, and efficient operations.

Chapter 13 of the [Municipal Code](#) is on Public Utilities, and it focuses on waste collection.

Analysts reviewed existing actions in the Utilities Element against WA's [Climate Element Planning Guidance](#) to ensure effectiveness. They also reviewed additional policies and actions to consider, pulling from resources such as WA's [Climate Guidance Dashboard](#).

The Utilities Element considers GHG reduction, as it focuses on:

- **Sustainability** There is an emphasis on comprehensive recycling and composting programs.
- **Efficiency:** Coordinating underground utility installations with new development is a key focus.

GENERAL CLIMATE CONSIDERATION AND INTEGRATION

Climate change acts as a "hazard multiplier," worsening existing hazards. **Changes in precipitation patterns** can lead to both increased flood risk and reduced water availability. **Rising temperatures** can increase energy demand for cooling, straining the electrical grid.

Climate hazards can significantly impact utilities, potentially disrupting services and causing extensive damage. Key hazards include:

Flooding:

Flooding can damage infrastructure, including electric substations, pipelines, and water and sewer lines, leading to service disruptions.

Inundation of septic systems and drain fields can cause failures, leading to water quality issues.

Extreme precipitation events can increase flood risk, impacting critical infrastructure.

Rising Puget Sound water levels can influence infrastructure such as the utilities around the Chambers Creek Dam.

Severe Weather:

Windstorms can cause power outages by toppling trees and breaking power lines, disrupting energy supplies.

Ice storms can damage trees and utility wires due to the accumulated weight of ice, leading to power outages.

Snowstorms can compromise access to public transportation, shelters, and healthcare facilities.

Wildfires:

Wildfires can damage power generating stations and transmission corridors. They can also affect the frequency of smoke events.

Drought:

Drought conditions can threaten the ability to maintain utility services, particularly for electric and water utilities that rely on a steady water supply. Reduced streamflow can affect hydroelectric power generation.

Landslides:

Areas with steep slopes, like Chambers Creek Canyon, can experience increased landslides with heavy rainfall, potentially damaging infrastructure. Landslides can knock out supports of bridges carrying power, water, and gas lines, causing tertiary hazards such as outages.

Energy Emergencies:

Energy emergencies can occur due to severe weather, leading to extended electrical outages. Solar storms could impact the electric grid, damaging transformers and telecommunication lines.

Addressing these climate-related hazards requires proactive measures, including:

- **Updating building and energy codes** to better address hazards resulting from climate change.
- **Enhancing the urban tree canopy** to mitigate urban heat island effects and address stormwater drainage.
- **Partnering with service providers** to strategically schedule improvements and minimize community disruption.
- **Building awareness** in the community about risks from natural disasters.
- **Improving the safety and reliability of infrastructure** vulnerable to climate change.
- **Require new subdivisions to bury electricity transmission lines** and associated infrastructure to reduce damage from storms and wildfire ignition risks.
- **Planning for wildfire hazards**, including prevention, harm reduction, and recovery.
- **Building resiliency for water quality and quantity** from drought, extreme heat, and other hazards worsened by climate change.

Potential and optional language or updates for consideration to enhance climate resilience in the Utilities Element or future Climate Element:

Climate resilience: Coordinate strategic improvements to minimize community disruption and reduce costs.

Are there specific measures to ensure the utility system can withstand and recover from extreme weather events? Lakewood can engage with utility providers to align their plans with city policies and manage utility corridors effectively.

Enhance Natural Infrastructure: Identify, design, and invest in infrastructure that supports community resilience, including the protection and enhancement of natural infrastructure to protect utilities.

Promote Innovative Solutions: Support innovative approaches to fund improvements that address environmental and aesthetic impacts of utility infrastructure.

Surface Water and Flood Control: Provide efficient, cost-effective, and environmentally sound surface water and flood control solutions. Plan and implement necessary upgrades to flood control systems to meet standards.

Electrical Servicing: Require new developments to demonstrate access to adequate electrical servicing and align energy facilities plans with city policies. Plan for future electrical infrastructure to meet developmental needs, managing aesthetic and health impacts.

Underground Utilities: Coordinate the installation of underground utilities with urban development initiatives to optimize aesthetic and functional improvements. Coordinate with major street renovation projects to streamline construction efforts and minimize disruption.







Vegetation Management: Collaborate with utility providers to develop comprehensive right-of-way vegetation plans. Require utility facilities to be appropriately sited and screened to mitigate aesthetic impacts.

Telecommunications: Promote state-of-the-art local telecommunications systems to enhance connectivity, support economic growth, and improve public information access. Streamline the permit process for private utility facilities, considering franchise agreements and development regulations.

Alignment with Comprehensive Plan Elements: Coordinate utility plans with **capital facilities planning** to ensure all services comply with the Comprehensive Plan and meet community needs.

Alignment with the [Sustainability 2030: Pierce County's Greenhouse Gas Reduction Plan's 5 focus areas](#) and the [County Climate Resilience Plan](#)



Action Focus Area	Objectives	Greatest Opportunities
 Energy & Built Environment	<ol style="list-style-type: none"> 1. Expand access to clean and renewable energy 2. Improve energy efficiency of homes, commercial buildings, and industrial buildings 3. Encourage innovative and efficient building design 	<ul style="list-style-type: none"> + Transition the electric grid toward 100% clean energy + Retrofit existing homes, commercial and industrial buildings to electric heating. + Onsite solar installation and community renewable energy projects + Efficient all-electric new developments
 Transportation	<ol style="list-style-type: none"> 1. Increase use of public transit, ride sharing and active (walking, biking) transportation 2. Minimize commutes and incentivize teleworking 3. Encourage density in the urban unincorporated area with mixed-use and transit-oriented development 4. Promote electric vehicles, clean fuels and expand the network of electric car charging stations 	<ul style="list-style-type: none"> + Support transit and active transportation options + Reduce single-driver car trips + Improve land use codes to efficiently utilize land, materials, energy, alternative transportation systems and infrastructure + Transition to zero emission vehicles
 Waste Reduction	<ol style="list-style-type: none"> 1. Expand GHG reduction efforts in solid waste and recycling 2. Encourage behaviors that consider life cycle impacts and reduce waste 	<ul style="list-style-type: none"> + Reduce unnecessary consumption and food waste + Ensure our solid waste system follows greenhouse gas (GHG) reduction best management practices
 Nature-based Climate Solutions	<ol style="list-style-type: none"> 1. Protect and conserve lands for carbon sequestration and ecosystem services 2. Increase the use of carbon sequestration best management practices 3. Expand urban tree canopy and green spaces 	<ul style="list-style-type: none"> + Conserve mature forests + Protect and restore eelgrass beds, kelp forests, saltwater wetlands and floodplains + Maintain forestland and increase tree canopy cover in urban areas + Prioritize absorbent landscapes by capturing and retaining water as a key strategy for carbon sequestration
 Education & Outreach	<ol style="list-style-type: none"> 1. Foster democratic participation and equity by increasing decision-making opportunities 2. Increase broad community engagement to develop GHG reduction policies that are equitable 3. Align programs, workshops, and messaging with existing community concerns and priorities 	<ul style="list-style-type: none"> + Increase awareness and understanding of GHG emissions and their impacts + Make it easier for community members to take action and participate in decision-making processes + Leverage federal and state funding opportunities for Pierce County residents
 Growing Community Capacity	<ol style="list-style-type: none"> 1. Foster community leadership in sustainable solutions 2. Connect community members to local natural systems 	<ul style="list-style-type: none"> + Increase community member capacity to participate in sustainability actions + Broaden the number of actors and community-based organizations taking action



Capital Facilities and Essential Public Facilities

- **HB 1181 requirements have been satisfied. Lakewood's Capital Facilities Element is in compliance.**

The Capital Facilities and Essential Public Facilities Element has been updated to contain an inventory of existing capital facilities owned by public entities **to include green infrastructure.** (See Appendix B – *in development*).

WA Resources

www.commerce.wa.gov/growth-management/gma-topics/capital-facilities/

Element Overview: Chapter 3 of Lakewood's Comprehensive Plan outlines goals, policies, and the city's relationships with external service providers. It directs the management and financing of capital improvements for city-owned and operated facilities and utilities to ensure they can support new developments as the city grows. This means that infrastructure improvements must be in place at the time of development or have funding secured within 6 years of development. Lakewood's 6-year Capital Facilities Capital Improvement Plan (6-year CIP) is included within city documents focused on parks and open space or transportation.

The chapter uses LOS standards to ensure adequate facilities are provided to support new housing and employment. These standards cover roadways, pedestrian/biking infrastructure, transit, parks, fire protection, EMS, and water supply. Under state law, the Capital Facilities Plan Element identifies the

proposed locations and capacities of expanded or new capital facilities. The city funds these projects through a mix of grants and other sources. The two main departments coordinating capital facilities planning are Public Works and Engineering and Parks, Recreation, and Community Services.

Lakewood categorizes its services into four types:

- Type 1: Services directly provided by the city (e.g., city facilities, parks and recreation, transportation, stormwater management, solid waste, police).
- Type 2: Services provided by special districts with independent taxing authority (e.g., fire and emergency medical services).
- Type 3: Utilities provided by special districts, counties, or companies (e.g., sanitary sewer, water, electricity).
- Type 4: Services provided by the federal government for federal land.

In this Chapter, Lakewood identifies appropriate land for essential public facilities as defined under state law, including solid waste handling, landfills, airports, state educational facilities, correctional facilities, and in-patient facilities.

Lakewood relies on special districts, other jurisdictions, and private companies for urban services such as water, sewer, and power. Lakewood formed its own police department in 2004.

Coordination with Other Elements: Planning and programming for transportation and parks, which are major components of city spending on capital facilities, are guided by the Transportation Element, the Parks, Recreation & Open Space Element, and the Parks Legacy Plan.

Lakewood defines **green infrastructure (GI)** as an array of natural assets and built structures within an urban growth area boundary, including parks and other areas with protected tree canopy. GI can also be management practices at multiple scales. Green approaches for infrastructure development are environmentally and fiscally efficient and provide long-term benefits to the community by reducing energy consumption and maintenance and capital improvement costs.

Lakewood aims to develop green infrastructure standards that rely on natural processes for stormwater drainage, groundwater recharge, and flood

management. The City is looking to partner with developers to support public amenities for green infrastructure.

EC-4.4 aims to **Promote Green Infrastructure:** Develop green infrastructure standards that relies on natural processes for stormwater drainage, groundwater recharge and flood management.

HB1181 defines **GI** as an array of natural assets and built structures within an urban growth area boundary, including parks and other areas with protected tree canopy, and management practices at multiple scales. Green infrastructure supports community resilience to climate impacts by managing wet weather and maintaining and restoring natural hydrology through storing, infiltrating, evapotranspiring, and harvesting and using stormwater.

Other attributes of GI and green spaces include:

- Accessibility to the public.
- Promotion of physical and mental health of residents.
- Provision of relief from urban heat island effects.
- Promotion of recreational and aesthetic values.
- Protection of streams or water supply.
- Preservation of visual quality along highways, roads, or street corridors.

Lakewood should Align definitions

Sub area plan – (fed grant award) Green street loop – linear park – in a transition time to ramp up LID – working amenities for downtown to .. add more pedestrian/active transportation friendly

To integrate green infrastructure principles into Lakewood's Capital Facilities and Essential Public Facilities Element, the following strategies could be implemented:

- **Prioritize Green Infrastructure:** A capital facilities plan must include an inventory of existing capital facilities owned by public entities, including green infrastructure. Lakewood should recognize green infrastructure as a key component of its capital facilities.

- **Stormwater Management:** Develop green infrastructure standards that rely on natural processes for stormwater drainage, groundwater recharge, and flood management.
- **Low Impact Development (LID):** Make the use of Low Impact Development (LID) techniques in public and private developments the preferred and most widely used method of land development. Employ LID BMPs (Best Management Practices) where feasible in public access facilities. New facilities constructed at City shoreline parks should employ LID practices and green building techniques.
- **Natural Environment Preservation:** Design residential development to preserve existing shoreline vegetation, control erosion, and protect water quality. Decrease the amount and impact of overwater and in-water structures by minimizing structure size and using more environmentally friendly materials.
- **Ecosystem Restoration:** Restore native vegetation along shorelines to protect and preserve ecosystem-wide processes, ecological functions, and cultural resources, including fish passage, wildlife, water resources, critical areas, hydrogeological processes, and natural scenic vistas.
- **Urban Forestry:** Maintain an urban forestry program to preserve significant trees, promote tree health, and increase tree coverage citywide, working towards a goal of 40% tree canopy cover by the year 2050. Use native vegetation to provide safe migration pathways for fish and wildlife, food, nest sites, shade, and perches.
- **Public Access and Recreation:** Enhance safe public access for the use of shoreline areas and lakes. Design landscaping in common open space areas to allow for easy access and use of the space by all residents.
- **Community Engagement:** Provide education opportunities and involve the public in restoration projects, as most restoration projects need to occur on private property. Lakewood residents should be regularly consulted to design and update the plan.
- **Partnerships and Coordination:** Partner with developers to support public amenities for green infrastructure. Collaborate with community groups to enhance park and recreation services.

- **Funding and Investment:** Prioritize conservation and habitat restoration projects of high conservation value lands. Consider co-benefits of carbon emissions reduction when funding and designing County infrastructure projects.
- **Policy Integration:** Integrate green infrastructure considerations into the Capital Improvement Plan (CIP) and Transportation Improvement Program (TIP).
- **Resilience and Climate Change Adaptation:** Identify, protect, and enhance natural areas to foster resilience to climate impacts and provide areas of vital habitat for safe passage and species migration.
- **Monitoring and Maintenance:** Ensure proper inventories of hazardous materials are provided by businesses. Refrain from undertaking a capital improvement if the city or the service provider lack the resources to support ongoing operation and maintenance.

These strategies align with the GMA goals related to open space, recreation, the environment, and climate change and resiliency. The city can encourage water and energy conservation practices in the design, construction, and maintenance of city-owned buildings.

GENERAL CLIMATE CONSIDERATION AND INTEGRATION

Climate change and related hazards can significantly impact Capital Facilities and Essential Public Facilities. There is much overlap with the hazards described in the Utilities section. Additional considerations include:

- **Roadway Damage:** Flooding may directly impact infrastructure such as I-5 between Highway 512 and Bridgeport Way.
- **Water Quality:** Increased pollutant loads from flooding could worsen water quality issues in Lakewood's lakes and streams.

Many facilities are difficult to site due to potential adverse impacts. These include sewage treatment plants, reservoirs, electrical substations, airports, colleges, correctional institutions and stormwater facilities.

Lakewood should continue to **consider climate conditions** during the siting and design of capital facilities. Public infrastructure, especially parks, recreation facilities, and buildings, should incorporate climate-resilient designs. The City should continue to monitor and consider specific measures to ensure that capital facilities and essential public facilities are planned, designed, and

managed to withstand the impacts of climate change, protecting both infrastructure and community well-being.

Potential and optional language or updates for consideration to enhance climate resilience in the Capital Facilities and Essential Public Facilities Element or future Climate Element:

Planning and Design Measures:

- **Flood Risk Consideration:** Consider flood risks in the development and management of city infrastructure and facilities. Upgrade flood control systems to meet standards. Maintain a clear cost-sharing framework for storm drain and flood-control improvements.
- **Sustainable Practices and Green Infrastructure:** Incorporate ecologically sustainable practices and materials into new development, building retrofits, and streetscape improvements.
- **Urban Tree Canopy:** Enhance the quality and sustainability of the urban forest and tree canopy to mitigate urban heat island effects and address stormwater drainage concerns.
- **Hazard Management Plan:** Developing a comprehensive approach to hazards management planning to include possible climate change scenarios and includes both pre-incident and post-incident responses.
- **Essential Public Facilities Siting:** Establish efficient and transparent processes for the siting of essential public facilities. Maintain an inventory of essential public facilities. Align the identification of statewide essential public facilities with the standards set by the Washington State Office of Financial Management. Identify countywide essential public facilities in collaboration with relevant jurisdictions.
- **Climate Mapping:** Reference the Climate Mapping for a Resilient Washington platform (CMRW) to explore hazards and changes in the climate. Information about climate hazards included in the 2021 Comprehensive Plan should be locally specific enough to be actionable.
- **Risk Identification:** Improve the ability to identify areas prone to greater risk from climate change hazards and restrict development and redevelopment in those areas. Increase support for mapping and data collection of high-risk areas.

Resilience and Mitigation Strategies:

- **Building and Energy Codes:** Adopt and enforce building and energy codes, updating them as required by Washington State to better address the variety of hazards likely to result from climate change.
- **Hazard Mitigation Plans:** Integrating a Hazard Mitigation Plan into a Comprehensive Plan can help reduce long-term risk to people and property from natural hazards. Updated local hazard mitigation plans should assess the effects of climate change and other future conditions in the risk assessment.
- **Reducing Emissions, Energy Efficiency and Conservation:**
 - Promote efficient energy use and conservation in the design, construction, maintenance, and operation of public and private facilities, infrastructure, and equipment.
 - Promote energy and water conservation practices in the design, construction, and maintenance of city-owned buildings.
 - Retrofit buildings for energy efficiency. Incorporate ecologically sustainable practices and materials into new development, building retrofits, and streetscape improvements.
 - Encourage the construction of higher-density, mixed-use projects around existing public transit infrastructure, schools, parks, neighborhood-serving retail, and other critical services.
 - Encourage coordinated, multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled (VMT).
- **Community and Environmental Equity**
 - Prioritize reductions that benefit overburdened communities in order to maximize the co-benefits of reduced air pollution and environmental justice.
 - Improve the resilience of overburdened communities to the impacts of climate change through outreach and investment.

- **Renewable Energy:**
 - Require all publicly owned buildings to be powered completely by renewable energy by a target date.
 - Install distributed renewable energy generation and battery infrastructure at public facilities to store renewable electricity generated on-site and provide emergency power.
 - Increase the use of renewable energy sources like solar and wind power by the city.
- Promote **Waste Reduction and Recycling, Water Conservation and Reuse, Water Conservation and Reuse**

Ongoing Management and Collaboration:

- **Partnerships:** Partner with other jurisdictions, organizations, residents, and businesses to address climate change and support climate resiliency solutions.
- **Monitoring and Reporting:** Provide for ongoing monitoring and reporting of the city's carbon emissions and reduction efforts.
- **Water System Protection:** Assess critical assets and the actions necessary to protect the system from the consequences of extreme weather events on system operations. Generate reports describing the costs and benefits of the system's risk reduction strategies and capital project needs.

Appendices

- **Appendix A:** Documented updates to the **Utilities Element**
- **Appendix B:** Documented updates to the **Capital Facilities Element** with inventory of existing capital facilities owned by public entities, including green infrastructure.

2025-03 Updates to Lakewood development regulations regarding “middle housing” for consistency with E2SHB 1110²

E2SHB 1110, amending the GMA, SEPA, and other state statutes to encourage “middle housing”³ in historically single-family residential areas, requires that Lakewood:

- may only apply administrative design review for middle housing;
- may not require standards for middle housing that are more restrictive than those required for detached single-family residences;
- must apply to middle housing the same development permit and environmental review processes that apply to detached single-family residences, unless otherwise required by state law;
- is not required to achieve the per-unit density on lots after subdivision below 1,000 square feet unless the city chooses to enact smaller allowable lot sizes;
- must also allow zero lot line short subdivisions where the number of lots created is equal to the unit density required;
- may not require off-street parking as a condition of permitting development of middle housing within 0.5 miles walking distance of a major transit stop;
- may not require more than one off-street parking space per unit as a condition of permitting development of middle housing on lots smaller than 6,000 square feet before any zero lot line subdivisions or lot splits; and
- may not require more than two off-street parking spaces per unit as a condition of permitting development of middle housing on lots greater than 6,000 square feet before any zero lot line subdivisions or lot splits.

A SEPA categorical exemption is established for development regulations that remove parking requirements for infill development.

Note: The limits on off-street parking requirements do not apply if Lakewood submits to Commerce an empirical study prepared by a credentialed transportation or land use planning expert that clearly demonstrates, and Commerce certifies, that parking limits for middle housing will be significantly less safe for vehicle drivers or passengers, pedestrians, or bicyclists than if the jurisdiction's parking requirements were applied to the same location for the same number of detached houses. Lakewood will be preparing its empirical study in 2025 and seeking exemption from the off-street parking requirements.

The draft regulation amendments to fully implement middle housing administration in Lakewood follow the analysis below.

² E2SHB 1110 amends RCW 36.70A.030, .280; RCW 43.21C.450, .495; RCW 64.32; RCW 64.34; RCW 64.38; and RCW 64.90

³ “Middle Housing” is defined as buildings that are compatible in scale, form, and character with single-family houses and contain two or more attached, stacked, or clustered homes including duplexes, triplexes, fourplexes, fiveplexes, sixplexes, townhouses, stacked flats, courtyard apartments, and cottage housing.

2025-03 Analysis per LMC 18A.30.050 (B)

1. Does the proposed amendment or revision maintain consistency with other plan elements or development regulations? If not, are amendments or revisions to other plan elements or regulations necessary to maintain consistency with the current final docket that will be considered by the Planning Commission and the City Council? **Yes.**
2. Is the proposed amendment or rezone consistent with the goals of the Comprehensive Plan? **Yes.**
3. Is the proposed amendment or revision consistent with the county-wide planning policies? **Yes.**
4. Does the proposed amendment or rezone comply with the requirements of the GMA? **Yes.**

2025-03 SEPA Analysis

1. Is the proposed amendment consistent with the county-wide planning policies, the Growth Management Act (GMA), other state or federal law, or the Washington Administrative Code? **Yes.**
2. Would the proposed amendment have little or no adverse environmental impacts and is the time required to analyze impacts available within the time frame of the standard annual review process? **This is a non-project action. There would be no adverse environmental impacts due to its adoption.**
3. Is sufficient analysis completed to determine any need for additional capital improvements and revenues to maintain level-of-service, and is the time required for this analysis available within the time frame for this annual review process? **This is a non-project action. There would be no adverse environmental impacts due to its adoption.**
4. Can the proposed amendment be considered now without conflicting with some other Comprehensive Plan established timeline? **Yes.**
5. Can the proposed amendment be acted on without significant other amendments or revisions not anticipated by the proponents and is the time required for processing those amendments or revisions available within the time frame of this annual review process? **This is a non-project action. There would be no adverse environmental impacts due to its adoption.**
6. If the proposed amendment was previously reviewed, ruled upon or rejected, has the applicant identified reasons to review the proposed amendment again? **N/A.**

PPW RECOMMENDATION: The PPW recommends approval of Amendment 2025-03.

Definitions

Section LMC 18A.10.180 (new text is shown in underline; deleted text is shown in ~~strikethrough~~):

Term	LMC Definition	Amended Definition
Cottage housing	---	<u>“Cottage housing” means residential units on a lot with a common open space that either: (a) is owned in common; or (b) has units owned as condominium units with property owned in common and a minimum of 20 percent of the lot size as open space. Examples may include, but are not limited to, bungalow courts, garden court homes, courtyard cottages, and ecovillages.</u>
Courtyard Apartments	---	<u>“Courtyard apartments” means attached dwelling units arranged on two or three sides of a yard or court. Courtyard apartments may include, but are not limited to, garden apartments, and patio apartments.</u>
Duplex	--	<u>“Duplex” means a residential building with two attached dwelling units. See “Two (2) family residential structure, attached or detached dwelling units.”</u>
“Five (5) family residential structure, attached or detached dwelling units”	--	<u>“Five (5) family residential structure, attached or detached dwelling units” means five (5) dwelling units located on one (1) property. The term means the same thing as “fiveplex.”</u>
Fiveplex	--	<u>“Fiveplex” means a residential building with five attached dwelling units. See “Five (5) family residential structure, attached or detached dwelling units.”</u>
“Four (4) family residential structure, attached or detached dwelling units”	--	<u>“Four (4) family residential structure, attached or detached dwelling units” means four (4) dwelling units located on one (1) property. The term means the same thing as “fourplex.”</u>
Fourplex	--	<u>“Fourplex” means a residential building with four attached dwelling units. See “Four (4) family residential structure, attached or detached dwelling units.”</u>
Multiple-unit housing; multifamily housing; multifamily	“Multiple-unit housing,” “multifamily housing,” and “multifamily” may be used interchangeably and mean a building or a group of buildings having four (4) or more dwelling units for permanent residential occupancy, not designed or used as transient accommodations and not	“Multiple-unit housing,” “multifamily housing,” and “multifamily” may be used interchangeably and mean a building or a group of buildings having seven (7) <u>four (4)</u> or more dwelling units for permanent residential occupancy, not designed or used as transient accommodations and not including hotels and motels. Multifamily units may result from new

Term	LMC Definition	Amended Definition
	including hotels and motels. Multifamily units may result from new construction or rehabilitated or conversion of vacant, underutilized, or substandard buildings to multifamily housing.	construction or rehabilitated or conversion of vacant, underutilized, or substandard buildings to multifamily housing.
Single-family zones	--	<u>“Single-family zones” means those zones where single-family detached residences are the predominant land use.</u>
“Six (6) family residential structure, attached or detached dwelling units”		<u>“Six (6) family residential structure, attached or detached dwelling units” means four (6) dwelling units located on one (1) property. The term means the same thing as “sixplex.”</u>
Sixplex	--	<u>“Sixplex” means a residential building with six attached dwelling units. See “Six (6) family residential structure, attached or detached dwelling units.”</u>
Stacked Duplex	“Stacked duplex” means a small- to medium-sized structure that consists of two (2) stacked dwelling units, one (1) on top of the other, both of which face and are entered from the street.	
Stacked Flats		<u>“Stacked flat” means dwelling units in a residential building of no more than three stories on a residential zoned lot in which each floor may be separately rented or owned.</u>
Townhouse		<u>“Townhouses” means buildings that contain three or more attached single-family dwelling units that extend from foundation to roof and that have a yard or public way on not less than two sides. Examples may include, but are not limited, to rowhouses, triplexes, fourplexes, fiveplexes, and sixplexes.</u>
Triplex	--	<u>“Triplex” means a residential building with three attached dwelling units. See “Three (3) family residential structure, attached or detached dwelling units.”</u>
Unit density	--	<u>“Unit density” means the number of dwelling units allowed on a lot, regardless of lot size.</u>

Allowed Middle Housing Types

Per Commerce guidelines, City of Lakewood must permit at least six of the nine middle housing typologies in zones where lots are zoned predominantly for residential use. Lakewood currently explicitly allows all of these typologies except courtyard apartments and stacked flats. This Ordinance proposes to expand to permit all nine middle housing typologies in the City of Lakewood.

In order to incorporate these middle housing typologies, changes will be needed to

be made to Table 18A.40.110- Allowed Residential Uses by Residential Zoning District of LMC (new text is shown in underline; deleted text is shown in ~~strikethrough~~):

Table 18A.40.110- Allowed Residential Uses by Residential Zoning District

Use	ZONING DISTRICT													
	R1	R2	R3	R4	MR1	MR2	MF1	MF2	MF3	ARC	NC1	NC2	TOC	CBD
Accessory Caretaker's Unit											P	P	P	P
Accessory Dwelling Unit (ADU) ^{B1}	P	P	P	P	P	P	P	P					P	
Babysitting Care	P	P	P	P	P	P	P	P	P	P	P	P	P	P
Boarding House	C	C	C	C	C									
Cottage Housing ^{B2}	P	P	P	P										
Courtyard Apartments	P	P	P	P										
Foster Care Facility	P	P	P	P	P	P	P	P	P	P	P	P	P	P
Co-housing (dormitories, fraternities, and sororities)					P	P	P	P	P		P	P		
Detached Single-Family ^{B3}	P	P	P	P	P	P				P				
Two-Family Residential, attached or detached dwelling units. Duplex.	P	P	P	P	P	P	P			P	P	P		
Three-Family Residential, attached or detached dwelling units. Triplex.	P	P	P	P	P	P	P			P	P	P		
Four-family residential, attached or detached dwelling units. Fourplex.	P	P	P	P	P	P	P	P	P	P	P	P		
Five- and six-family residential, attached or detached dwelling units. Fiveplex and Sixplex.	P	P	P	P	P	P	P	P	P	P	P	P		
Stacked Flats	P	P	P	P							P	P		
Multifamily, seven or more residential units							P	P	P	P	P	P	P	P
Townhouse	P	P	P	P	P	P	P	P	P	P	P	P	P	P
Mixed Use											P	P	P	P
Family Daycare	P	P	P	P	P	P	P	P	P	P	P	P		
Home Agriculture	P	P	P	P	P	P	P	P	P	P				
Home Occupation	P	P	P	P	P									
Mobile Home Parks			C	C	C									
Residential Accessory Building	P	P	P	P	P	P	P	P	P	P	P	P	P	P
Rooms for the use of domestic employees of the owner, lessee, or occupant of the primary dwelling	P	P												
Small craft distillery		P	P	P	P							P	P	P
Specialized senior housing					C	C	C	C	C			P	C	C
Accessory residential use	P	P	P	P	P	P	P	P	P	P	P	P	P	P

Dimensional Standards

Table LMC 18A.60.030 Densities and Dimensions - Residential Zones will be amended to the following (new text is shown in underline; deleted text is shown in ~~strikethrough~~):

Table LMC 18A.60.030 Densities and Dimensions - Residential Zones

Density and Dimensional Standards	Zoning Classifications								
	R1	R2	R3	R4	MR1	MR2	MF1	MF2	MF3
Density (units per acre)	7.0/3.5/1.8 1.45 DUA	10.3/5.2/2.6 2.2 DUA	23.3/11.7/5.9 4.8 DUA	30.6/15.3/7.7 6.4 DUA	<u>22</u>	<u>35</u>	22	35	54
Minimum Unit Density (units per lot) (B)(1)	2	2	2	2					
Lot Size	25,000 GSF	17,000 GSF	7,500 GSF	5,700 GSF	No min. lot size	No min. lot size	No min. lot size	No min. lot size	No min. lot size
Building Coverage (B)(2)	45-35%	45-35%	45%	50%	55%	60%	60%	60%	60%
Impervious Surface	45%	45%	60%	70%	70%	75%	70%	70%	70%
Front yard / street setback	15-25 ft	15-25 ft	10 ft	10 ft	5 ft	5 ft	10-15 ft	10-15 ft	10-15 ft
Garage / carport setback	20-30 ft	20-30 ft	20 ft	20 ft	20 ft	20 ft	20 ft	20 ft	20 ft
Principal arterial and state highway setback	25 ft	25 ft	25 ft	25 ft	25 ft	25 ft	25 ft	25 ft	25 ft
Rear yard setback without an alley	1-3 units: 15-20 ft More than 3 units: 10 ft	1-3 units: 15-20 ft More than 3 units: 10 ft	10 ft	10 ft	5 ft	5 ft	10-15 ft	10-15 ft	10-15 ft
Rear yard setback with an alley (B)(3)	0 ft	0 ft	0 ft	0 ft	0 ft	0 ft	0 ft	0 ft	0 ft
Interior setback	Attached: 0 ft; Detached: 5 ft 8 ft	Attached: 0 ft; Detached: 5 ft 8 ft	Attached: 0 ft; Detached: 5 ft 8 ft	Attached: 0 ft; Detached: 5 ft 8 ft	Attached: 0 ft; Detached: 5 ft	Attached: 0 ft; Detached: 5 ft	8 ft	8 ft	8 ft
Building height	35 ft	35 ft	35 ft	35 ft	35 ft	50 ft	45 ft	65 ft	80 ft
Design	Design features shall be required as set forth in Chapter 18A.70 , Article I.								
Landscaping	Landscaping shall be provided as set forth in Chapter 18A.70 , Article II.								
Parking	Parking shall conform to the requirements of Chapter 18A.80 .								

GSF = gross square foot

LMC 18.60.030.B

B. Specific Development Considerations.

~~a. Residential (R) Maximum Density-~~

~~i. The maximum density requirements for Residential (R) zoning districts are listed as three figures, which are interpreted as follows:~~

~~1. _____ The first number refers to the maximum housing density (excluding accessory dwelling units) permitted on lots where additional affordable units are provided according to Chapter [18A.90](#) LMC or is located within the Residential/Transit Overlay as defined in Chapter [18A.50](#) LMC, Article IV, and do not include critical areas or their buffers as defined under LMC Title [14](#).~~

~~2. The second number refers to the maximum housing density (excluding accessory dwelling units) permitted on lots that do not include critical areas or their buffers.~~

~~3. The third number refers to the maximum housing density (excluding accessory dwelling units) permitted on lots that include critical areas or their buffers.~~

a. For all Residential (R) zoning districts, a minimum of two (2) housing units per lot (excluding accessory dwelling units) are allowed on all lots that meet minimum lot size requirements and do not include critical areas or their buffers, or four (4) housing units per lot where additional affordable units are provided according to Chapter [18A.90](#) LMC or additional units are permitted in locations close to a major transit stop under Chapter [18A.50](#) LMC, Article IV.

i. To qualify for additional units, an applicant shall commit to renting or selling the required number of units as affordable housing and meeting the standards below.

i. Dwelling units that qualify as affordable housing shall have costs, including utilities other than telephone, that do not exceed 30 percent of the monthly income of a household whose income does not exceed the following percentages of median household income adjusted for household size, for the county where the household is located, as reported by the United States Department of Housing and Urban Development:

a. Rental housing: 60 percent.

b. Owner-occupied housing: 80 percent.

ii. The units shall be maintained as affordable for a term of at least 50 years in accordance with RCW 36.70A.635(2)(a), and the property shall satisfy that commitment and all required affordability and income eligibility condition.

iii. The applicant shall record a covenant or deed restriction that ensures the continuing rental or ownership of units subject to these affordability requirements consistent with the conditions in chapter 84.14 RCW for a period of no less than 50 years.

iv. The covenant or deed restriction shall address criteria and policies to maintain public benefit if the property is converted to a use other than that which continues to provide for permanently affordable housing.

v. The units dedicated as affordable housing shall:

1. Be provided in a range of sizes comparable to other units in the development.

2. The number of bedrooms in affordable units shall be in the same proportion as the number of bedrooms in units within the entire development.

3. Generally, be distributed throughout the development and have substantially the same functionality as the other units in the development.

vi. Minimum and maximum numbers of dwelling units per structure for middle housing are invalid, except as provided by the definitions of middle housing typologies.

- vii. An applicant may also apply the Multifamily Tax Exemption (MFTE) program to its affordable dwelling units, provided the units qualify in accordance with Chapter 3.64.
- b.** The maximum lot coverage is as follows:
 - i.** For lots with a unit density of six: 55 percent
 - ii.** For lots with a unit density of four or five: 50 percent
 - iii.** For lots with a unit density of three or less: 45 percent
 - iv.** Unless the city has a different pre-existing approach to measuring lot coverage, lot coverage is measured as follows: the total area of a lot covered by buildings or structures divided by the total amount of site area minus any required or planned dedication of public rights-of-way and/or designation of private rights-of-way. Lot coverage does not include building overhangs such as roof eaves, bay windows, or balconies and it does not include paved surfaces.
- c.** The minimum setback for a rear alley is zero feet. It is three feet for a garage door where it is accessed from the alley.
- d.** No hard surface areas shall be allowed within the dripline of a significant tree to the maximum extent possible, subject to the tree preservation regulations of Chapter 18A.70, Article III.
- e.** The process used for reviewing compliance with middle housing design standards shall be administrative review as described under LMC Chapter 18A.20.

Design Standards

Article III of Chapter 18A.030 LMC- Discretionary Permits LMC shall be amended to the following (new text is shown in underline; deleted text is shown in ~~strikethrough~~):

18A.30.240 General Provisions

* * *

B. Individual cottage units shall contain at least eight hundred (800) and no more than ~~one thousand five hundred (1,500)~~ one thousand six hundred (1,600) square feet of gross floor area. A covenant restricting any increases in unit size after initial construction shall be recorded against the property. Vaulted space shall not be converted into habitable space.

C. A community building of up to ~~two thousand five hundred (2,500)~~ two thousand four hundred (2,400) square feet in size, excluding attached garages, may be provided for the residents of the cottage housing development. Roof pitch, architectural themes, materials and colors shall be consistent with those of the dwelling units within the cottage housing development.

~~D. Accessory dwelling units shall not be permitted in cottage housing developments. [Ord. 726 § 2 (Exh. B), 2019.]~~

18A.30.250 Development Standards

D. Setbacks and Building Separation

1. Dwelling units shall have at least a ~~ten (10) twenty (20)~~ foot front setback, ~~five (5) eight (8)~~ foot side yard setback and a ten (10) foot rear setback without an alley; Zero (0) foot rear setback with an alley; Three (3) foot rear setback for a garage door accessed from the alley.
2. Dwelling units shall be separated from one another by a minimum of five (5) ~~ten (10)~~ feet, not including projections.
3. Dwelling units shall maintain a five (5) ~~ten (10)~~ foot separation between buildings.

18A.30.260 Open Space

A. A minimum of three hundred (300) ~~five hundred (500)~~ square feet of common open space shall be provided per dwelling unit.

18A.30.270 Building Design Standards

A. Building Height
 The maximum building height for dwelling units shall be thirty-five (35) ~~twenty-five (25)~~ feet.

18A.30.280 Parking

A ~~minimum~~ maximum of one (1) parking spaces per cottage shall be provided for the entire development. An additional fifteen (15) percent of total required spaces shall be designated for guests. If the lot is within one-half (1/2) mile of a major transit stop, defined as a stop for commuter rail or bus rapid transit, no parking is required if adequate provision of on-street parking facilities is available as determined by the Director.

Off Street Parking

A. These standards apply to all housing meeting the definition of middle housing in Section 3, except as noted in subsection (C) of this section.

Table 18A.80.030(F) LMC Parking Standards Table will be amended to the following (new text is shown in underline; deleted text is shown in ~~strikethrough~~).

Table 18A.80.030(F) LMC Parking Standards Table

Use	Unit Measure	Minimum (TDM program only) ¹	Max	Required Bicycle Parking Spaces
Accessory Dwelling Unit ²	Per dwelling unit	<u>1</u>	N/A	<u>None</u>
	Per dwelling unit within <u>1/2 mile of a major transit stop (3)</u>	<u>0/1</u>	N/A	<u>None</u>
Affordable housing units within <u>1/4 1/2 mile of a major transit stop (any type)</u> ³	Per dwelling unit within <u>1/4 1/2 mile of frequent a major transit stop (any type) service</u> ³	Studio - 0.75-0 1 Bedroom - 1-0 2+ bedroom - 1.5-0	N/A	<u>1 per 7.5 auto stalls, 3 minimum per building</u>
Single-Family	Per dwelling unit	2	N/A	None
	Per dwelling unit	2	N/A	None
Duplexes ⁴	Per dwelling unit within <u>1/2 mile of frequent a major transit stop service</u> ⁴	<u>0</u>	N/A	<u>0.5 per unit</u>
	Per dwelling unit	Studio -1	N/A	2

Use	Unit Measure	Minimum (TDM program only) ¹	Max	Required Bicycle Parking Spaces
Multifamily structures with four to six units ⁴		1 bedroom – 1.25 2+ bedroom – 1.5		
	Per dwelling unit within ½ mile of a major transit stop	0	N/A	0.5 per unit
Multifamily Structures with seven or more units ⁵	Per Dwelling Unit	Studio – 1 1 Bedroom – 1.25 2+ bedroom – 1.5	N/A	1 per 10 auto stalls; 2 minimum per building
	Per dwelling unit within ½ mile of a major transit stop	Studio – 0.75 1 bedroom – 1 2+ bedroom – 1.5	N/A	1 per 7.5 auto stalls. 3 minimum per building

¹See LMC 18A.80.060(H)

Section LMC 18A.80.030.G will be amended to the following (new text is shown in underline; deleted text is shown in ~~strikethrough~~).

9. Residential parking standards for residential development do not apply to:
a. Portions of the city for which the Department of Commerce has certified a parking study in accordance with RCW 36.70A.635(7)(a), in which case off-street parking requirement shall be as provided in the certification from the Department of Commerce.

Section LMC 18A.30.280A Parking will be amended to the following (new text is shown in underline; deleted text is shown in ~~strikethrough~~).

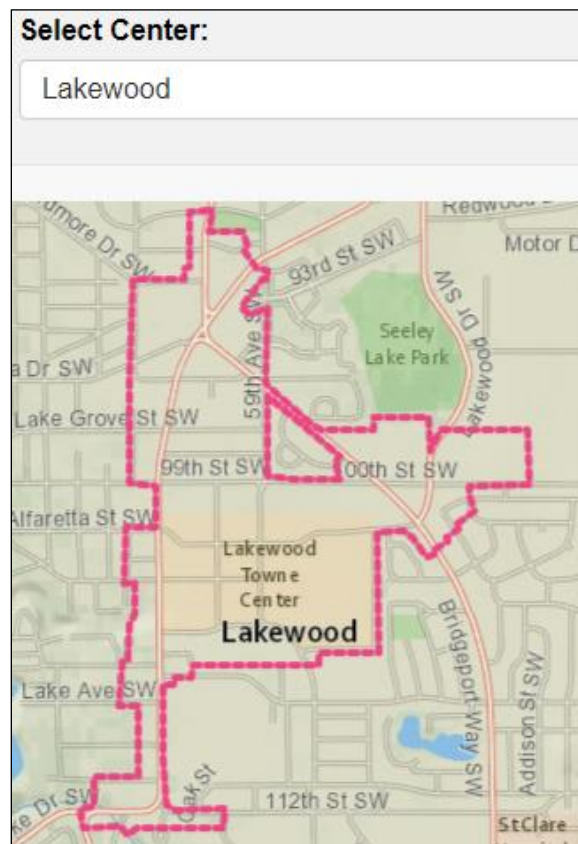
Section LMC 18A.30.280A

A maximum ~~minimum~~ of one (1) parking spaces per cottage shall be provided for the entire development. An additional fifteen (15) percent of total required spaces shall be designated for guests. If the lot is within one-half (1/2) mile of a major transit stop, defined as a stop for commuter rail or bus rapid transit, no parking is required if adequate provision of on-street parking facilities is available as determined by the Director.

2025-09 Review, and if needed, amend, the Lakewood Regional Urban Growth Center (RUGC)’s implementation through the Downtown Subarea Plan (DSAP) for consistency with PSRC’s Regional Centers Framework Redesignation Requirements

BACKGROUND FOR 2025-12

The Puget Sound Regional Council (PSRC) certified the Lakewood Regional Urban Growth Center (RUGC) in 2012. When Lakewood adopted the Downtown Subarea Plan, regulations, and planned action in 2018, the City worked with PSRC to amend the RUGC’s boundaries to match the Downtown Subarea.



Source: PSRC Lakewood Regional Growth Center Profile

Beginning in 2025, the PSRC will review and re-certify regional centers per the PSRC Regional Centers Framework (RCF) every 5 years to “assess each center’s performance in accommodating growth consistent with the Regional Growth Strategy” (i.e., describe physical characteristics, assess potential for accommodating future growth, review for consistency with Centers Framework criteria., and update center characteristics.)



For PSRC’s Centers review, the following process will be used:

Policy Considerations	Next Steps
Growth, mobility, and urban form in urban growth centers	Present early findings to GMPB in March 2025
Density requirements	Release draft Regional Centers System Monitoring report in early spring
Housing and displacement in regional growth centers	Regional centers redesignation process in summer/fall 2025
Population growth in manufacturing/industrial centers	Update System Monitoring report and consider updates to the Centers Framework in 2026
Role of countywide centers	

Centers monitoring reports will be presented to PSRC boards for consideration. If a center is not fully meeting the Regional Centers Framework (RCF) criteria at the time of centers monitoring, PSRC boards may consider removing the regional center designation or consider probationary status until planning requirements are met.

After monitoring occurs, all regional centers that meet each of the criterion outlined in the RCF will be automatically redesignated. Center policies and plans may be re-certified concurrent with redesignation.

During the first Centers monitoring review in 2025, existing regional growth centers will be expected to fully meet the following eligibility and designation criteria:

- Local commitment. Evidence center is a local priority and sponsor city/county has sustained commitment over time to local investments in creating a walkable, livable center;
- Planning. An updated center plan (subarea plan, plan element or functional equivalent that provides detailed planning or analysis) that addresses regional

guidance, and plans for a mix of housing and employment, bicycle and pedestrian infrastructure, amenities, and a street pattern that supports walkability;

Assessment of housing need includes displacement risk, as well as review of the documentation of tools, programs, or commitment to provide housing choices affordable to a full range of incomes and strategies to further fair housing;

- Capital investments. Capital investments by the local government in the center in the current or prior 6-year capital planning cycle, and commitment to infrastructure and utilities in the jurisdiction’s capital improvement program sufficient to support center growth, pedestrian infrastructure, and public amenities;
- Center criteria. Consistent with designation criteria for size, planning, transit, market potential, and role for new regional growth centers in Section 3 of the RCF. Existing centers will remain designated if they do not meet the new center density criteria, provided that the center is consistent with other criteria identified in this section;
- Market study. Regional growth centers that have existing density levels below the level required for new regional centers at the time of the review must complete a market study to evaluate the potential for and opportunities to best support center growth. The market study:
 - o must consider a planning horizon reasonably beyond 2025;
 - o should show how the center can meet targeted levels of growth within the planning period; and
 - o should demonstrate Lakewood’s work to address opportunities identified in the market study and the center is consistent with other criteria identified in the Framework.

The following actions were taken to prepare the language of Amendment 2025-09 for Planning Commission review regarding Lakewood’s RUGC:

1. Updating the boundary of the Lakewood RUGC to match the Downtown Subarea boundary as approved in Ordinance 812;
2. Review growth targets (i.e., people and job activity units in the RUGC) for consistency with the Regional Centers Framework and the July 2024 PSRC communication to Lakewood regarding the 2024 Comprehensive Plan Periodic Review;
3. Review allowed land uses and development regulations for consistency with PSRC Regional Urban Growth Centers Criteria;
4. Conduct a market study to evaluate the potential for and opportunities to best support center growth.

Based on the 2025 RUGC analysis and market study, one action is proposed:
Updating the boundary of the Lakewood RUGC to match the Downtown Subarea

boundary as approved in city Ordinance 812. This is a process conducted directly with PSRC and does not require action by the Planning Commission or City Council.

No amendments to the Lakewood Comprehensive Plan, Zoning Map, DSAP, or development regulations are recommended under 2025-09.

Attached following this review text section is the March 2025 analysis and market study of the Lakewood Regional Urban Growth Center (RUGC) and Downtown Subarea Plan (DSAP.)

2025-09 Analysis per LMC 18A.30.050 (B)

1. Does the proposed amendment or revision maintain consistency with other plan elements or development regulations? If not, are amendments or revisions to other plan elements or regulations necessary to maintain consistency with the current final docket that will be considered by the Planning Commission and the City Council? **N/A**
2. Is the proposed amendment or rezone consistent with the goals of the Comprehensive Plan? **N/A**
3. Is the proposed amendment or revision consistent with the county-wide planning policies? **N/A**
4. Does the proposed amendment or rezone comply with the requirements of the GMA? **N/A**

2025-09 SEPA Analysis

1. Is the proposed amendment consistent with the county-wide planning policies, the Growth Management Act (GMA), other state or federal law, or the Washington Administrative Code? **N/A**
2. Would the proposed amendment have little or no adverse environmental impacts and is the time required to analyze impacts available within the time frame of the standard annual review process? **N/A**
3. Is sufficient analysis completed to determine any need for additional capital improvements and revenues to maintain level-of-service, and is the time required for this analysis available within the time frame for this annual review process? **N/A**
4. Can the proposed amendment be considered now without conflicting with some other Comprehensive Plan established timeline? **N/A**
5. Can the proposed amendment be acted on without significant other amendments or revisions not anticipated by the proponents and is the time required for processing those amendments or revisions available within the time frame of this annual review process? **N/A**
6. If the proposed amendment was previously reviewed, ruled upon or rejected, has the applicant identified reasons to review the proposed amendment again? **N/A.**

PPW RECOMMENDATION: The PPW recommends no action under Amendment 2025-09.

Lakewood Regional Urban Growth Center Analysis / Downtown Subarea Market Study

City of Lakewood
March 2025



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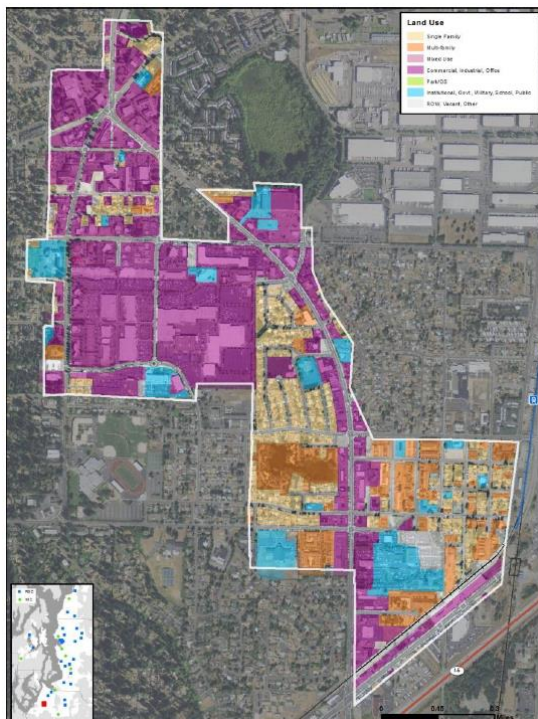
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Purpose and Background

The City of Lakewood has produced this Market Study of its Regional Urban Growth Center (RUGC) in anticipation of the 2025 Center redesignation process to be conducted by the Puget Sound Regional Council (PSRC.) The study considers the Lakewood RUGC’s performance and potential against current market conditions and trends and sets expectations for future development required to meet target goals.

In 1995, before Lakewood incorporated, the PSRC designated a 538-acre RUGC that included the entire Central Business District (CBD) and the majority of the area surrounding Sound Transit’s Lakewood commuter rail station. In 2016, PSRC certified that Lakewood’s Comprehensive Plan “policies support the role of the Regional Growth Center.”

Once the Lakewood Downtown Subarea Plan (DSAP) was finalized in 2018, the PSRC RUGC boundaries were significantly reduced to match the Downtown Subarea’s boundaries¹. PSRC certified that Lakewood’s DSAP met the criteria for a Center plan concept, as well as for environment, land use, housing, economy, public services, and transportation elements.



Previous Lakewood RUGC Boundary



2019 Lakewood RUGC Boundary

¹ In 2021, Lakewood adopted a separate subarea plan, SEPA planned action, and hybrid form-based regulatory code for the Station District Subarea.

The 2018 Downtown Subarea and 2019 RUGC boundaries match and encompass 333 acres. In its Final EIS, the subarea was anticipated to have achieved more than the minimally-required 18 “activity units” (population + jobs) and would achieve more than the minimally-required 45 activity units per gross acre development capacity for the future required activity level.

Key components of this market study include:

- Analysis of Lakewood’s PSRC-designated Regional Urban Growth Center’s (RUGC’s) performance to date and planned growth;
- Review and satisfaction of current PSRC RUGC criteria;
- Future City growth target goals for housing and employment assigned to the RUGC;
- Lakewood’s strategies for reaching RUGC target goals; and
- Overview of national, regional, and local economic trends.

Key Findings

Lakewood’s Regional Urban Growth Center (RUGC) meets the current PSRC Regional Centers Framework Criteria and should be redesignated.

Lakewood has the potential to accommodate several leading industry sectors within the (RUGC.) The top growth sectors include Professional & Technical Services, Healthcare & Social Services, and Leisure & Hospitality. All of these sectors fit nicely with mixed-use development and redevelopment of retail spaces. JBLM, Camp Murray, St Clare Hospital, and Western State Hospital populations create demand for the same industry sectors. Infill development, mixed-use redevelopment, and transit-oriented development are ways in which the City may best add more density in housing and employment in Lakewood..

The City continues to seek public and private funding for catalyst projects that could lead to additional private investment in the RUGC. The City also actively seeks additional state and federal funding for streets and other amenities. State and federal funds are likely to be the primary funding of improvements since transportation mitigation fee (TMF) collection has been limited and was never meant to address the full cost. The City has also been supporting new mixed use housing development and has been pursuing two public park sites in the RUGC.

Lakewood Regional Urban Growth Center (RUGC) satisfaction of PSRC’s Regional Growth Center Criteria

Regional Growth Center Criteria	Lakewood RUGC Info									
<p>1. Compatibility with VISION 2040: The jurisdiction's vision for the proposed regional growth center must reinforce the centers concept within the VISION 2040 regional growth strategy and multi-county planning policies.</p>	<p>Lakewood's Downtown Subarea plan is certified by PSRC as the required plan for the City's RUGC. Lakewood is committed to transitioning the RUGC to compact, walkable, and transit-oriented development.</p>									
<p>2a. The center's existing density must be at least 18 activity units per acre. 2b. The center's planned target density must be 45+ activity units per acre.</p>	<p>In its Final EIS, the 2018 Downtown Subarea was estimated at 319 acres, but the final boundary encompasses 333 acres. In the FEIS, the subarea was anticipated to achieve more than the minimally-required 45 activity units per gross acre development capacity for the future activity level.</p> <table border="1" data-bbox="813 869 1414 1073"> <thead> <tr> <th>Feature</th> <th>Existing (2014)</th> <th>Adopted</th> </tr> </thead> <tbody> <tr> <td>Activity Units with 319 acres including gross parcels and ROW to centerline</td> <td>19.32</td> <td>57.80</td> </tr> <tr> <td>Activity Units with 268.95 gross parcel acres</td> <td>22.89</td> <td>68.50</td> </tr> </tbody> </table> <p>As of 2023, Lakewood's 333-acre RUGC had 19 activity units per acre. View the PSRC profiles page.</p>	Feature	Existing (2014)	Adopted	Activity Units with 319 acres including gross parcels and ROW to centerline	19.32	57.80	Activity Units with 268.95 gross parcel acres	22.89	68.50
Feature	Existing (2014)	Adopted								
Activity Units with 319 acres including gross parcels and ROW to centerline	19.32	57.80								
Activity Units with 268.95 gross parcel acres	22.89	68.50								
<p>2c. The center must have sufficient zoned development capacity to adequately accommodate targeted levels of growth. Because it is not time-bound, zoned capacity can allow levels of development that are higher than the activity unit target. This allows a jurisdiction to support long-term higher levels of density that achieves the regional vision for a more compact, complete and mature urban form in regional centers.</p>	<p>Lakewood's 2024 Comprehensive Plan update and Downtown Subarea Plan align with GMA growth targets. PSRC certified the City's Comprehensive Plan on February 27, 2025.</p> <p>Lakewood adopted subarea-specific land use and zoning to achieve density goals within the RUGC. As an example: single-family, two-family, and three-family dwelling units are not allowed uses in the Downtown Subarea. Multifamily and mixed-use developments are allowed uses.</p> <p>View Title 18B Downtown Development Code</p>									
<p>2d. A goal should be in place for the center to have a mix of at least 15% planned residential and employment activity in the center.</p>	<p>Current planning targets for the Downtown Subarea include an increase of 7,317 net new jobs and 2,257 new housing units. This is a ratio of 30.85% planned residential vs employment activity in the center.</p>									

<p>3. Size: The center must be at least 200 acres and no more than 640 acres, unless the center is served by an internal, high-capacity transit system, in which case, it may be larger. and has headways less than 15-minutes.</p>	<p>The Downtown Subarea is ~333 acres.</p>
<p>4. Transit: The center must have existing or planned fixed route bus, regional bus, Bus Rapid Transit (BRT), or other frequent and all-day bus service. High-capacity transit may be substituted for fixed route bus. Frequent service is defined as service that operates all-day (operates at least 16 hours per day on weekdays)</p>	<p>The Pierce Transit Lakewood Transit Center is located at the Towne Center mall in the Downtown Subarea. The Transit Center provides bus connections to Sea-Tac Airport, Tacoma, JBLM, Pierce College, and other regional points of interest.</p>
<p>5. Market potential: There must be evidence of future market potential to support planning target.</p>	<p>This document is an overview of the future market potential of the RUGC to support planning targets.</p>
<p>6. Role: There must be evidence that the center will play a clear regional role by serving as an important destination for the county and the jurisdiction must be planning to accommodate significant residential and employment growth under the regional growth strategy.</p>	<p>The Downtown Subarea is the most proximate regional center to JBLM & Camp Murray, St. Clare Hospital, Pierce College, and Clover Park Technical College. The City is regionally positioned to serve both housing and employment needs for these institutions and their populations.</p>

Review of Previous RUGC/DSAP Reports and Plans

PSRC and the City of Lakewood has completed a number of studies and plans related to the development and growth of the RUGC and Downtown Subarea.

[Lakewood Existing Conditions Report \(2017\)](#)

The Existing Conditions Report summarizes environment, land use, demographics, employment, housing, transportation, and public service conditions in the City of Lakewood.

[Lakewood Downtown Subarea Plan \(DSAP\)](#)

The DSAP outlines the vision for Lakewood’s Downtown Subarea. The plan includes multi-modal transportation upgrades, new public green spaces, a city festival area, and design standards to guide future development.

[PSRC Lakewood Subarea Plan Certification Report \(2019\)](#)

The Subarea Plan Certification Report outlines how the required metrics and conditions were met by the DSAP to serve as the plan for the City’s RUGC.

[Lakewood DSAP Biennial Reviews \(2020, 2022, and 2024\)](#)

Per City Council direction, Lakewood conducted biennial status reviews of the implementation of the DSAP in 2020, 2022, and 2024 to verify whether implementation was proceeding as anticipated and whether updates were needed to the subarea’s zoning, regulations, or SEPA planned action. Future DSAP reviews will occur in conjunction with GMA-required decennial Comprehensive Plan periodic updates and implementation progress reports.

Recent planning efforts for the Downtown Subarea have focused on meeting 2044 growth targets and amending development standards to ensure that the RUGC remains a focus area for housing and job growth.

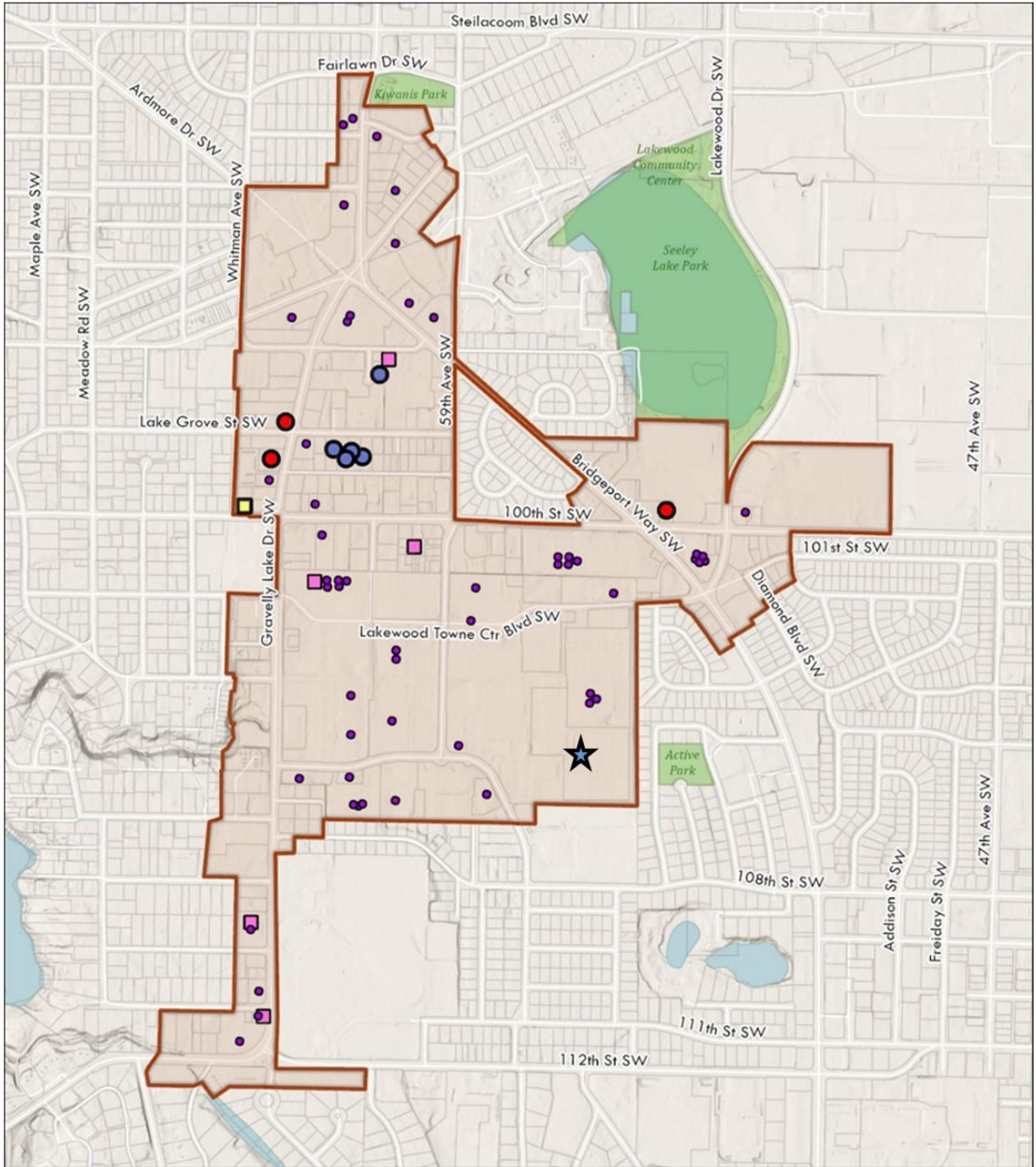
Target Area	Citywide	Downtown Subarea/ Regional Urban Growth Center	Station District Subarea	Outside of Subareas	Emergency Housing Units
Target Date	2044	2035	2035	2044	2044
Housing Units	9,378 net new units	2,257 net new units (~24% of citywide 2044 target)	1,722 net new units (18% of citywide 2044 target)	5,399 net new units (58% of citywide 2044 target)	574
Jobs	9,863 net new jobs	7,317 net new jobs (~74% of citywide 2044 target)	1,276 net new jobs (~13% of citywide 2044 target)	1,279 net new jobs (~13% of citywide 2044 target)	-

2024 adopted Lakewood Growth Targets (citywide and per subarea)

Since the October 2018 adoption of the DSAP package and through February 2024, 69 permits within the subarea were accepted, issued, or finalized, including 3 new commercial buildings and 309 new dwelling units. In addition, 25 remodels and 29 tenant improvements were permitted. With tenant improvements, a number of businesses changed from one type to another and spaces were improved to accommodate the new use. As of March 2024, 2,559 square feet of new commercial retail space and 376 units (309 residential and 67 commercial) had been permitted or were in progress.

The map below depicts the project locations.

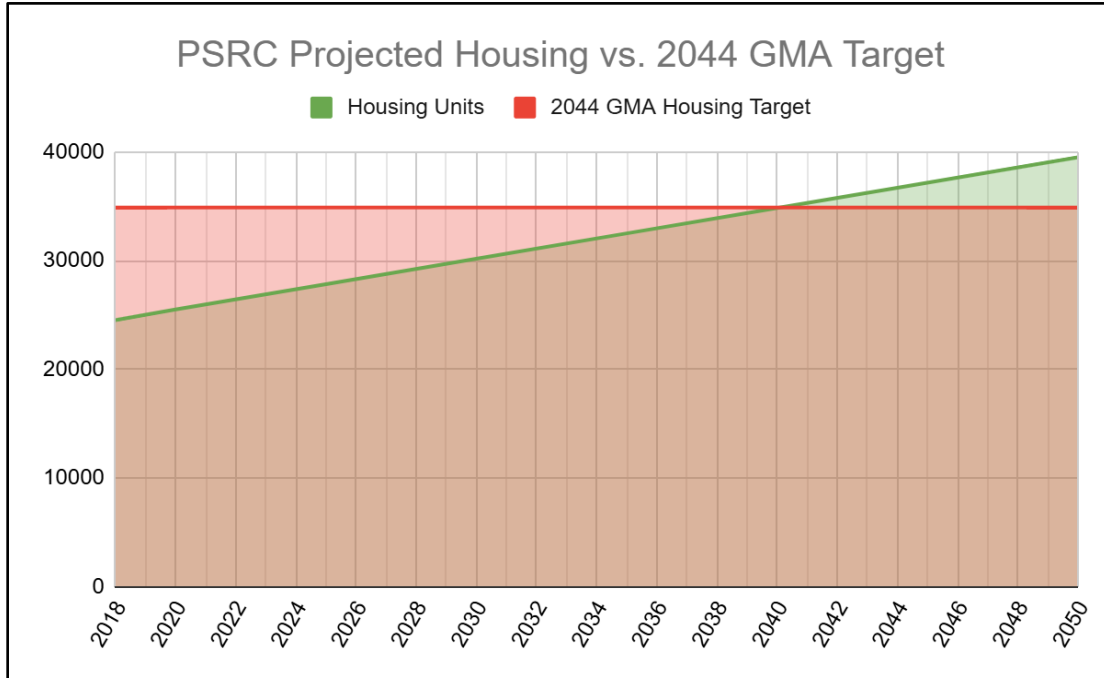
Between October 2018 and February 2024, 179 new jobs had located within the RGUC.



Downtown Permits October '18 – January '24, & Proposed Residential Master Planned Development

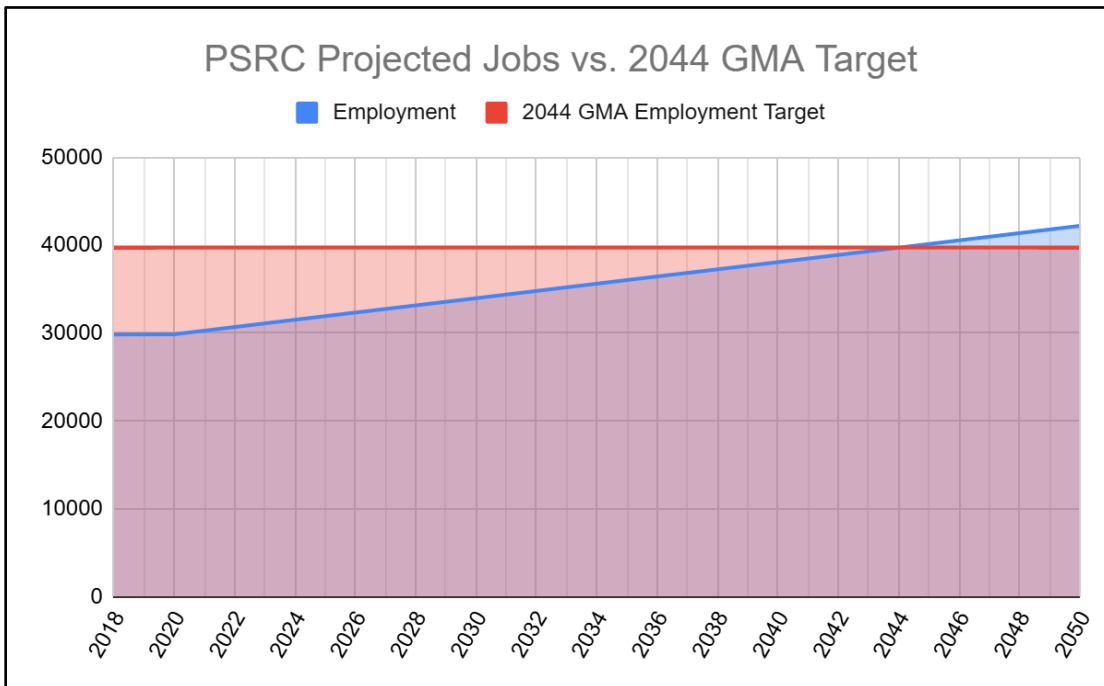
PSRC Growth Projections for City of Lakewood vs. 2044 GMA Growth Targets

Housing



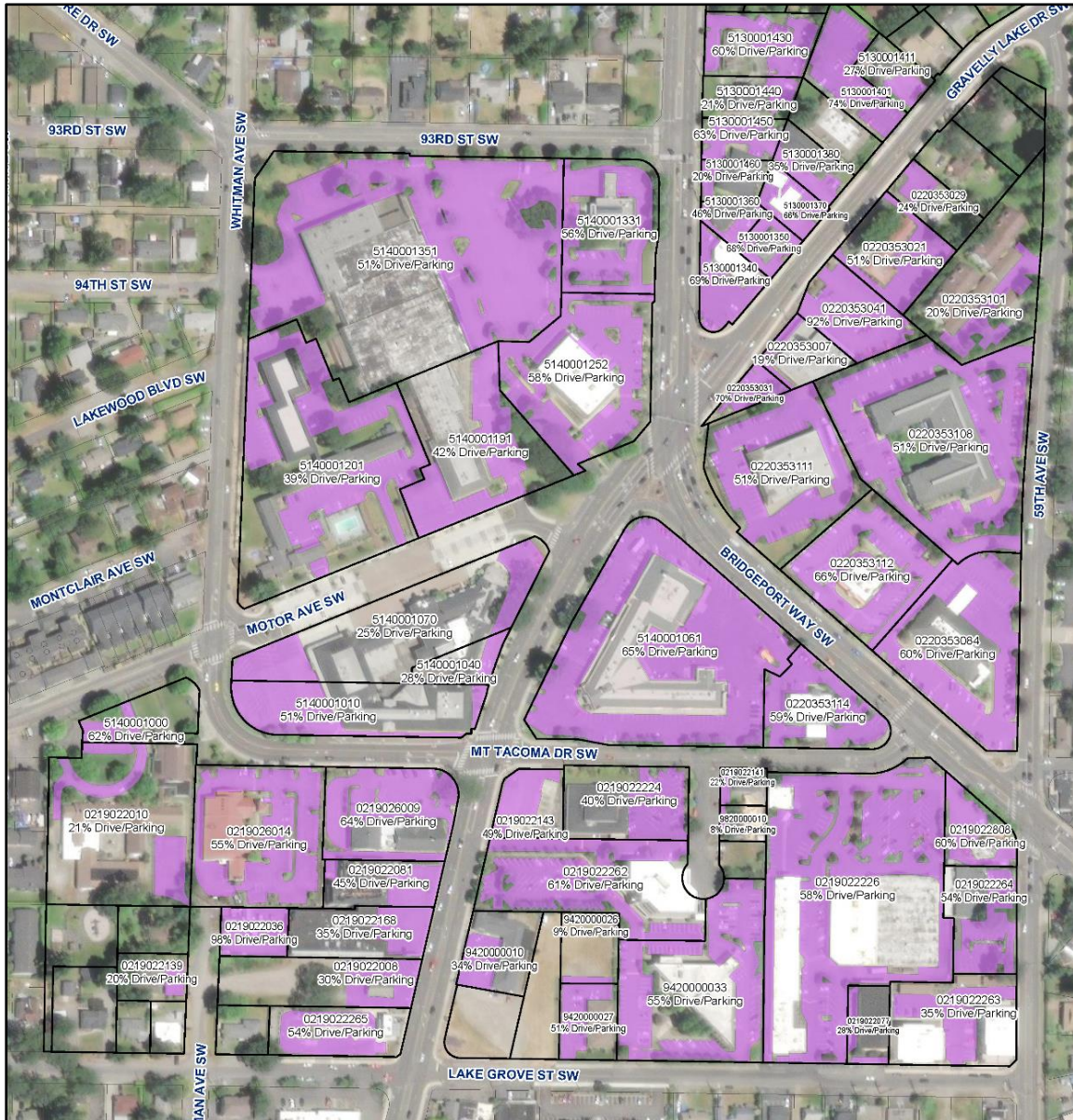
Source: PSRC 2023

Employment



Source: PSRC 2023

Colonial Plaza Parking & Pavement Analysis



Lakewood recently produced an overview of the northern portion of the Downtown Subarea to inform potential developers about the Colonial Plaza/Motor Ave. area. This area includes the Colonial Theater, Best Western Hotel, and surrounding parcels. As part of the overview, a parking study was conducted to determine the degree of land dedicated to open parking lots in this area.

Most parcels in the area were found to be ~50% open parking lot/driving surface. Intelligent land use planning and development incentives that Lakewood has already put in place can make better use of this space into the future, including mixed-use, walkable developments with parking facilities that make better use of the limited land area available for use.

Current Redevelopment Strategies

Lakewood faces several challenges to implementing its Downtown Subarea Plan. One major challenge is stoking interest for private-sector development activity. It is difficult to attract projects which fit the goals and standards set by the Downtown Subarea Plan to build affordable housing while remaining financially attractive for potential developers.

Land availability is another major challenge for Lakewood. Most land in the city has been built out, and the City is bordered on all sides by other municipalities, Camp Murray, and Joint Base Lewis-McChord (JBLM.) Most future development in Lakewood will be in the form of infill and redevelopment of existing properties.

Tools and Strategies to incentivize development:

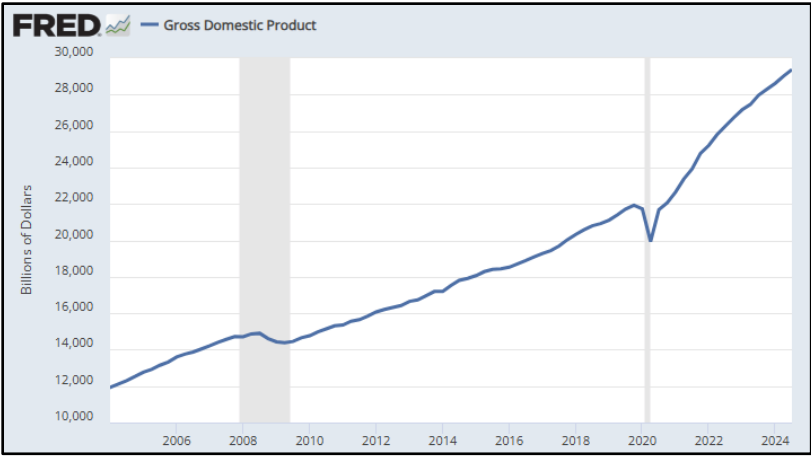
Strategy	Description
Encouraging Development	<ul style="list-style-type: none"> ● Expanded areas eligible for MFTE Program ● Downtown Subarea Development Codes ● Transportation Mitigation Fee to fund future transportation improvements to the subarea ● No Local B&O Tax
Marketing and Recruitment	<ul style="list-style-type: none"> ● Liaise between property owners and developers ● Subarea plans to catalyze development ● Brochures, marketing materials and campaigns ● Surveys and Business Retention & Expansion (BRE) ● Build Your Better Here website ● Proactive residential and commercial recruitment

Baseline Market Analysis

Gross Domestic Product

National GDP

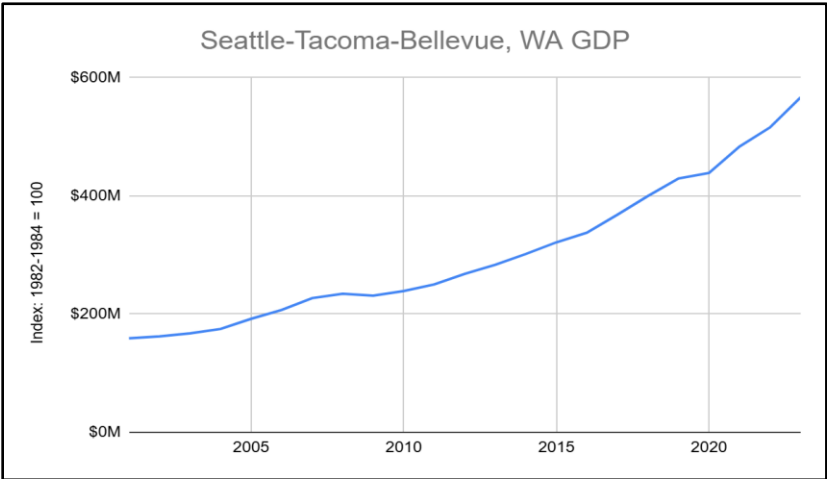
The U.S. economy as measured by Gross Domestic Product (GDP) has increased steadily over the past 20 years. Aside from two downturns during and immediately following the 2008 housing market crisis and the COVID-19 emergency, GDP has increased every year for the past twenty years.



Source: U.S. Bureau of Economic Analysis

Seattle-Tacoma-Bellevue GDP

The Seattle-Tacoma-Bellevue GDP kept pace with the National GDP over the past 10-20 years. The regional GDP rose steadily through the entire period, aside from slight stagnation during the 2008 housing market crisis and the Covid-19 emergency.

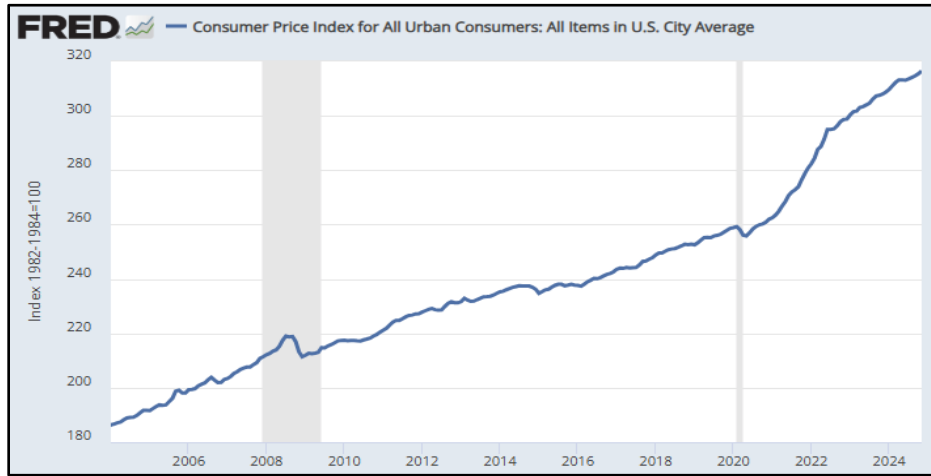


Source: U.S. Bureau of Economic Analysis

Consumer Price Index (CPI)

National CPI

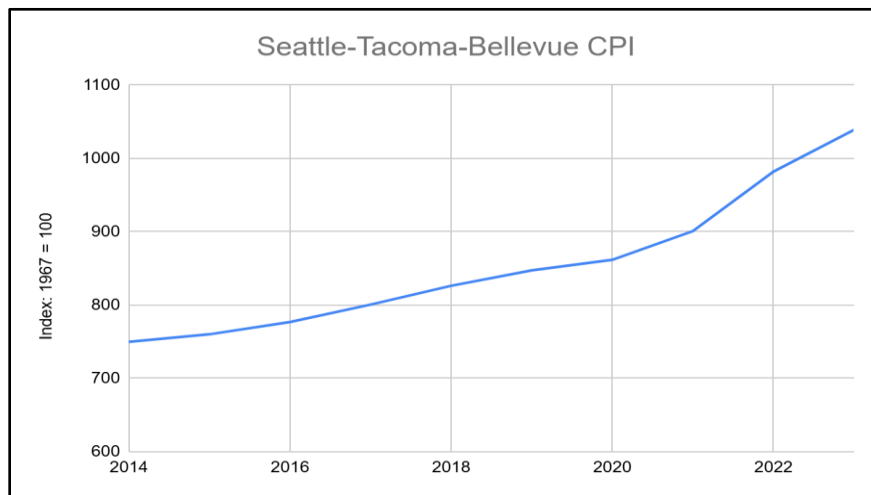
Consumer prices and inflation have also risen steadily for the past 10 years with a large uptick and rebound immediately following the COVID-19 emergency. Increases in everyday prices reduces the affordability of already high-priced housing for many citizens.



Source: U.S. Bureau of Labor Statistics

Seattle-Tacoma-Bellevue, WA Consumer Price Index (CPI)

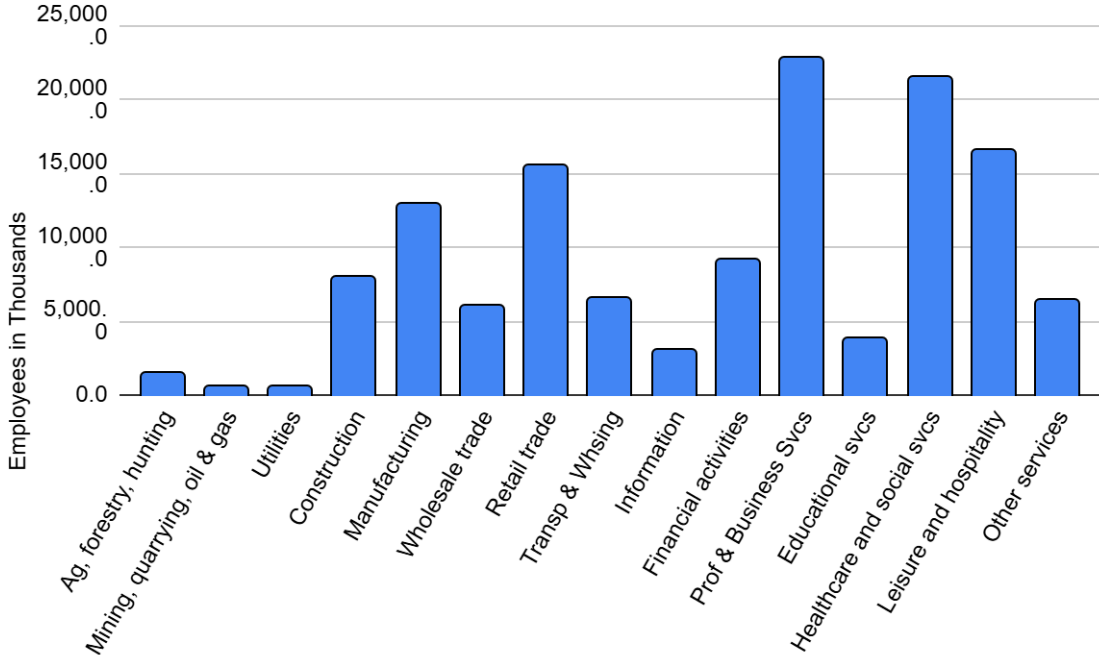
The Seattle-Tacoma-Bellevue CPI increased at about the same pace as the national CPI, though the CPI in this region tends to be consistently higher than the national average.



Source: U.S. Bureau of Labor Statistics

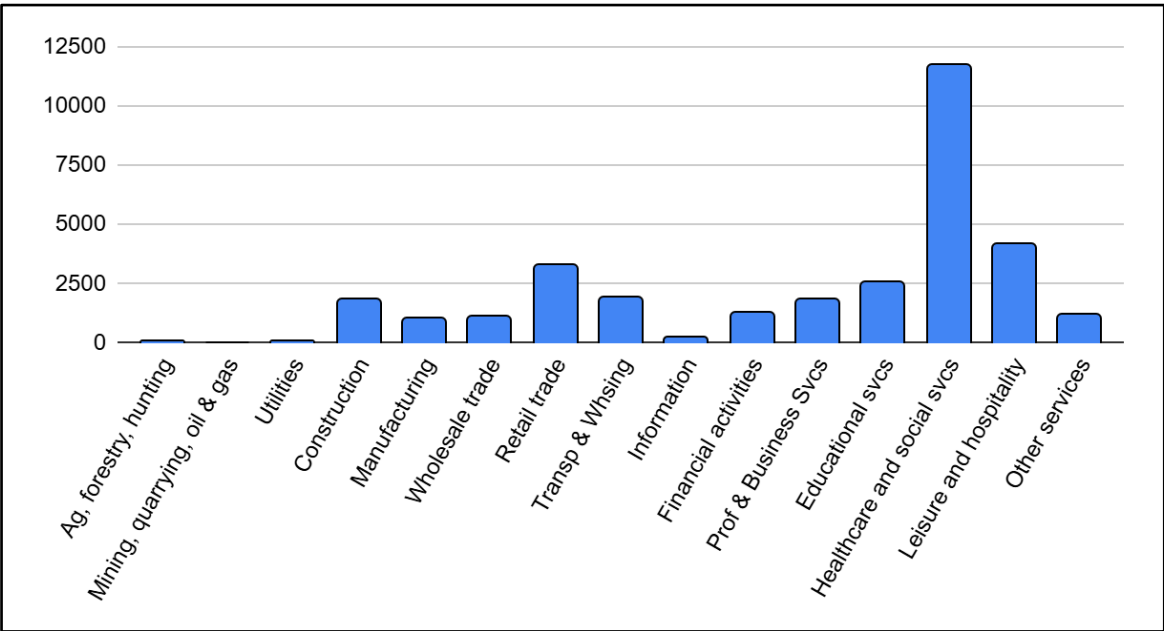
Employment by Industry

National Industry Employment by Numbers (2023)



Source: U.S. Bureau of Labor Statistics

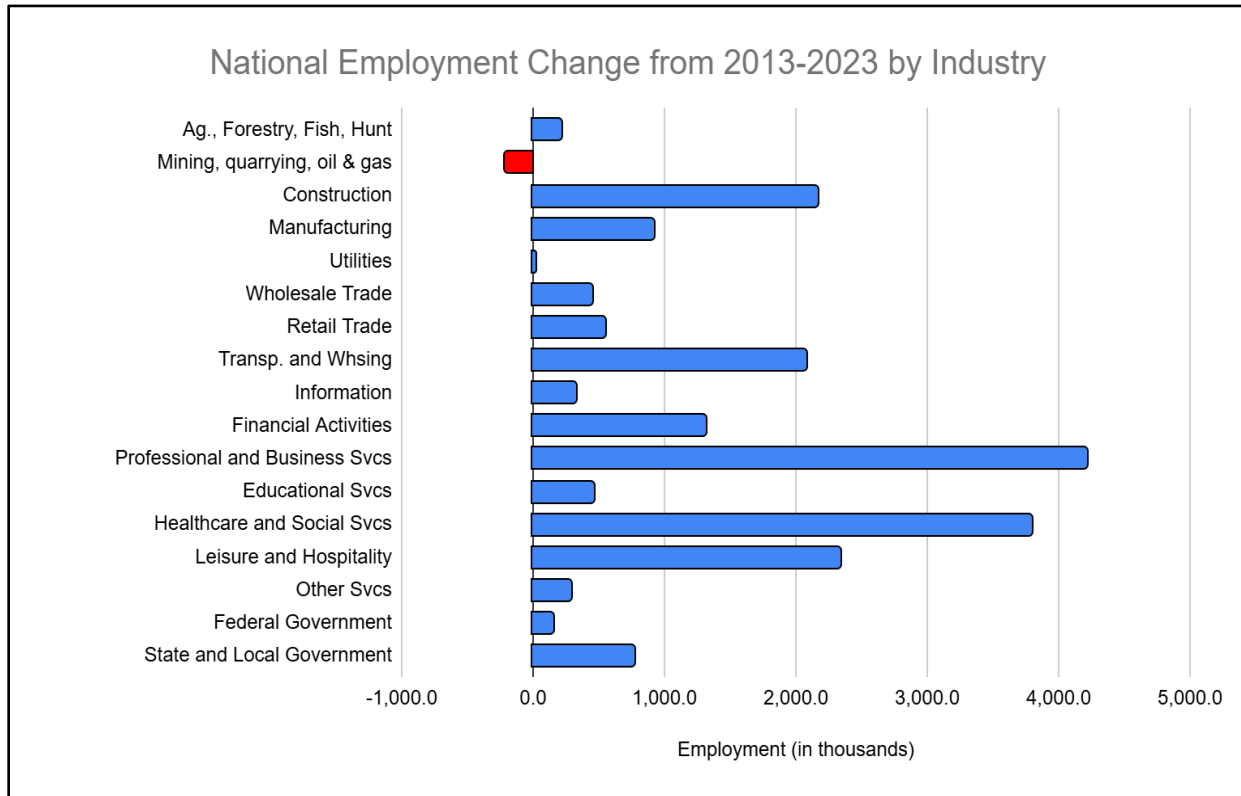
Lakewood Industry Employment by Numbers (2023)



Source: Workforce Central

Past National Employment Growth by Industry

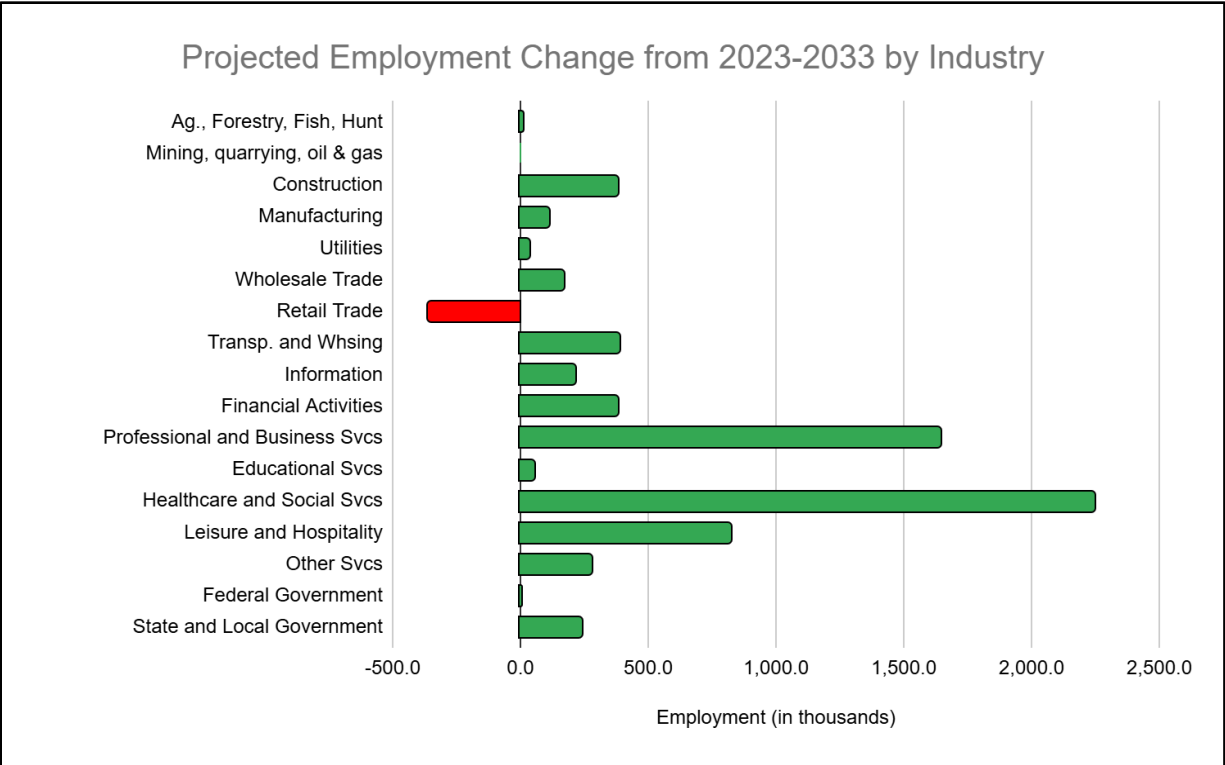
Several industries stood out as major national growth sectors from 2013-2023. Professional and Business Services, Healthcare and Social Services, Leisure and Hospitality, Construction, and Transportation & Warehousing.



Source: U.S. Bureau of Labor Statistics

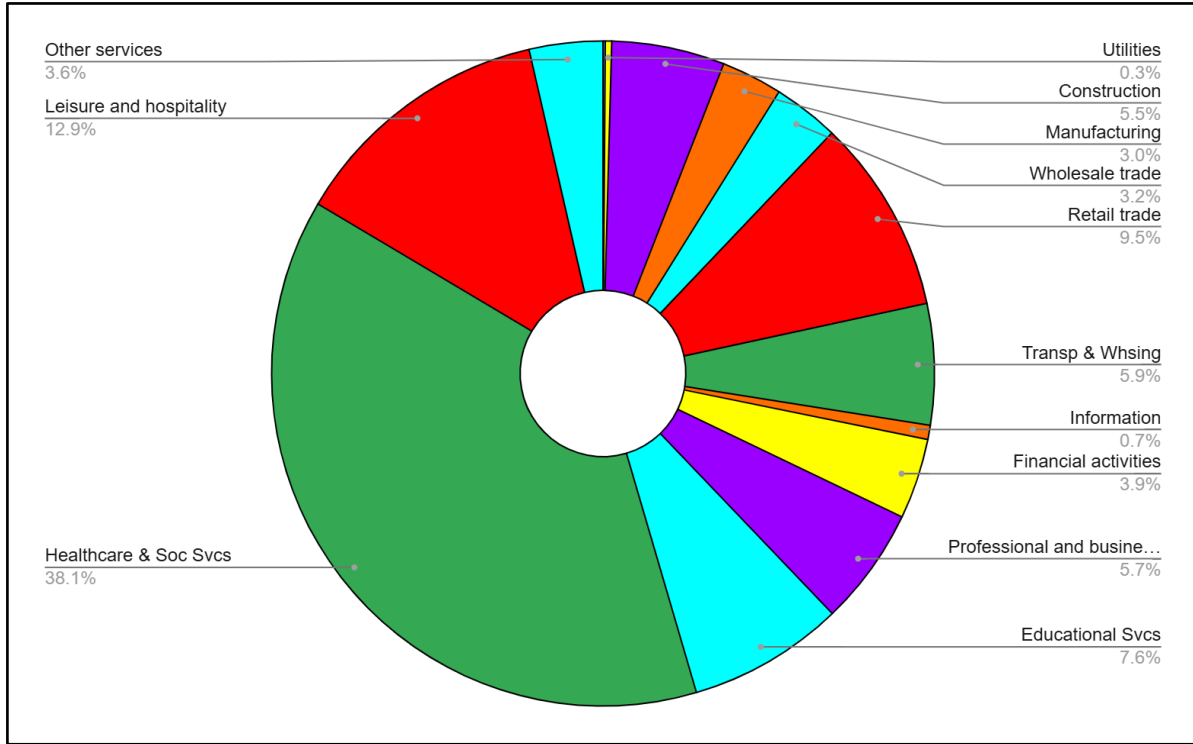
Future National Employment Growth by Industry

Though overall national employment growth is expected to slow slightly, Professional and Business Services, Healthcare and Social Services, Leisure and Hospitality, Construction, and Transportation & Warehousing are expected to remain the largest growth sectors through 2033. Retail is the only sector that is expected to shrink moving towards 2033.

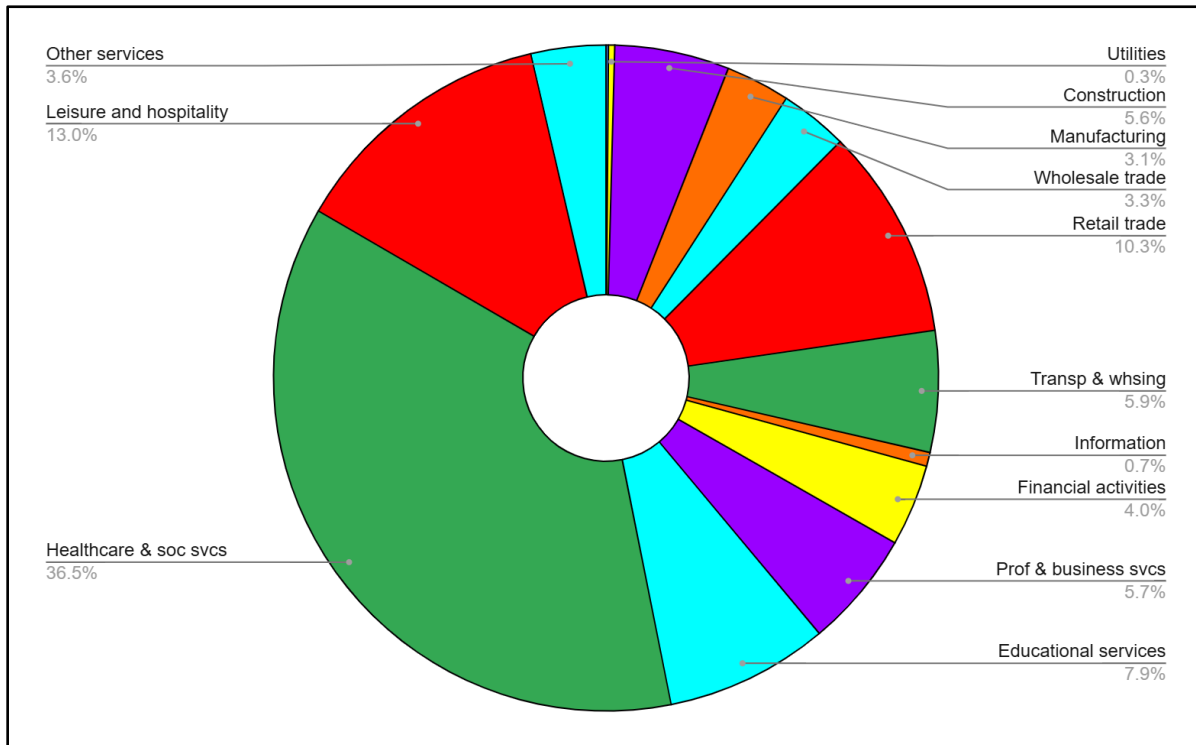


Source: U.S. Bureau of Labor Statistics

Lakewood Distribution of Employment by Industry (2023)



Lakewood Forecasted Distribution of Employment by Industry (2033)



Regional Location

Lakewood receives feedback from local and regional businesses that the regional location of the City is fantastic for transportation and trades. Lakewood has a larger share of Construction and Transportation & Warehousing industry sector employment than the national and regional averages due to businesses setting up shop near the interchange of I-5, SR 512, and S. Tacoma Way.



Economic Points of Interest

Towne Center Mall within the RUGC

Lakewood’s Towne Center Mall area has a great opportunity to provide space for employers in major growth sectors. Open-plan retail spaces and parking lots can be redeveloped to office use and mixed-use developments to provide for Health & Social Services, Professional & Business Services, and Leisure & Hospitality employers. The Retail sector is expected to shrink over the next 10 years, so pivoting in this way could be instrumental to Lakewood’s future growth.



Lakewood Transit Center within RUGC

The Lakewood Transit Center located at the Towne Center Mall in Downtown Lakewood provides regional connections directly to the heart of Lakewood’s Regional Growth Center. The Transit Center connects to Tacoma, Sea-Tac International Airport, the Lakewood Sounder Commuter Rail Station, Joint Base Lewis-McChord, Pierce College, and other surrounding municipalities.



Joint Base Lewis-McChord (JBLM)



Joint Base Lewis-McChord (JBLM) is recognized as a major regional employment center. The Base has an enormous regional economic impact. In 2023, the South Sound Military & Communities Partnership (SSMCP), in collaboration with the UW Tacoma Center for Business Analytics, found JBLM's annual regional economic impact to be in excess of \$8.0 B. The 2024 Washington Statewide Defense Economic Impact Study found that 78,890 active duty and civilians were employed by JBLM and that the installation contributed \$9.0 B to the state's economy.

Lakewood is host city to JBLM. The City has a large share of rental units due in large part to providing for a portion of the 100,000+ Servicemembers, civilian contractors, and family members brought to the area by the Base. The City continues to work with JBLM to clear all development out of the North McChord Field Clear Zone and steward a safety area around the airfield. Lakewood also continues to work with JBLM on land use and housing related to the Base and its service members.

Sounder Station

Lakewood Sounder Station provides a commuting route via the Sounder South Commuter Rail Line. This allows Lakewood residents to commute north more easily to open opportunities for employment in the Seattle area.

Sound Transit is currently constructing over \$40M in access improvements near the station. The projects will improve pedestrian and bicycle infrastructure and safety in the area surrounding the station.



Port of Tacoma



Lakewood takes advantage of its proximity to both the Port of Tacoma and I-5 by providing several industrial areas across the City that cater to Transportation & Warehousing and Manufacturing employers. Lakewood's regional placement along with great access to I-5 makes the City an ideal location for shipping, warehousing, and regional contractors.

The Port of Tacoma supports more than 42,000 jobs and generates ~\$3,000,000,000 per year in labor income. Lakewood is well situated to provide space for indirect and induced jobs and economic impacts related to port activities including office supply firms, maintenance and repair firms, parts and equipment suppliers, and housing for workers and their families.

International District



Lakewood's International District along South Tacoma Way is home to a wide variety of people and businesses of many different cultures. Known to some as Lakewood's "Koreatown", the district has a wide array of Korean, Mexican, Pacific Islander, African, and Vietnamese restaurants, retail stores, and services.

People visit Lakewood from across the region for businesses and experiences unique to the people and cultures represented in the City.

St. Clare & Western State Hospitals

Lakewood has over three times more Healthcare & Social Services employees than any other employment sector. St. Clare Hospital & Western State Hospital are major contributors to that statistic. The Hospitals and their ancillary service providers employ a significant number of Lakewood residents in the fastest growing employment sector.



Pierce College

Pierce College is the largest college district in Pierce County, drawing more than 13,500 students annually. The Steilacoom campus offers 26 Associate Degrees, 6 Bachelor Degrees, and 8 Direct Transfer Agreement Degrees. Pierce College works closely with JBLM to offer Military Technology and Leadership degrees via accelerated, hybrid, online, and on-base classes.



Clover Park Technical College



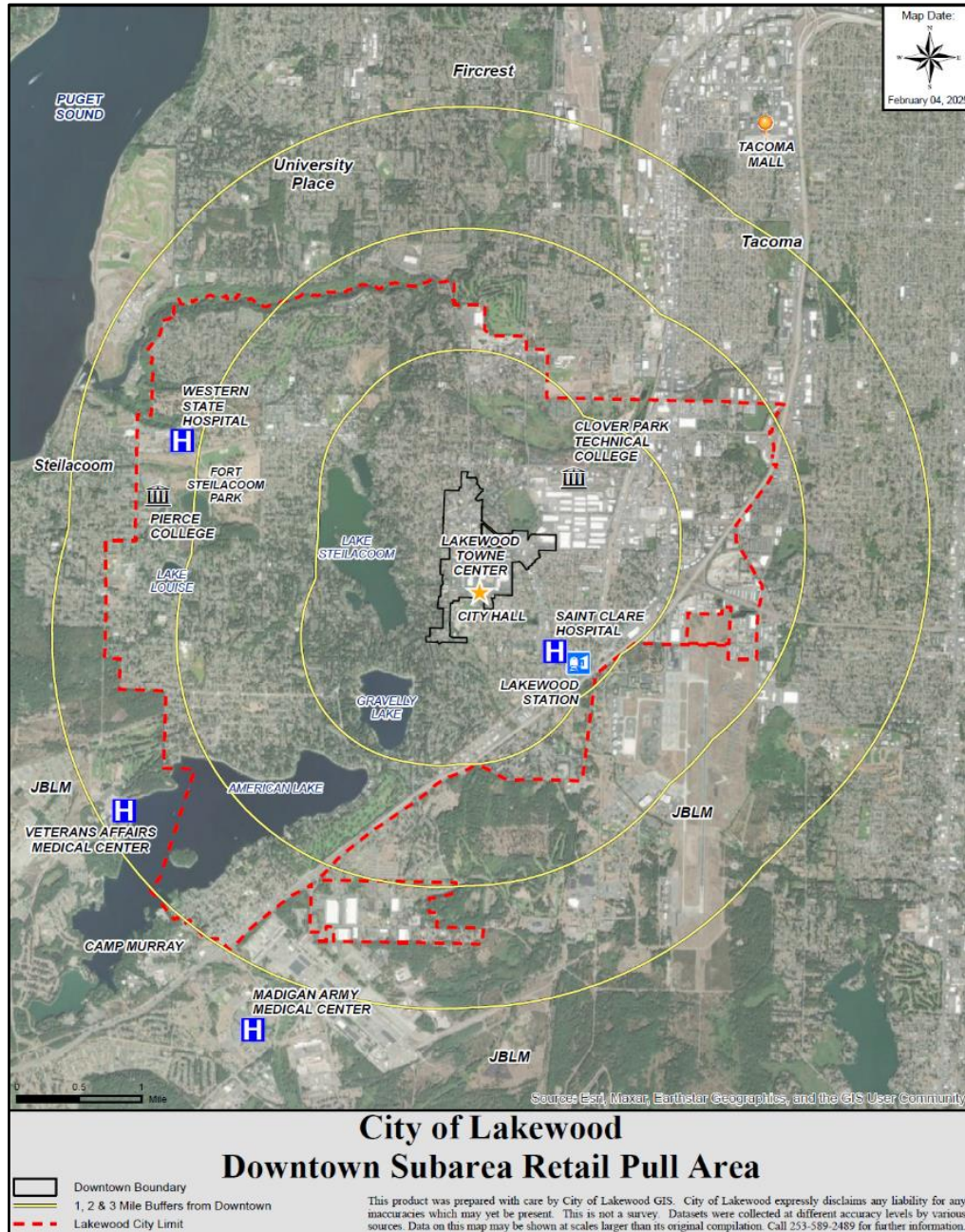
Clover Park Technical College draws approximately 3,000 students annually. The Technical College offers 120 degrees and certificates across 40 programs. Offerings include high-school and pre-college programs, technical programs, leadership programs, professional development programs, and 6 bachelor degree programs.

Retail Market

Retail Leakage

Lakewood generally pulls in more retail business than expected for its population. The Downtown Subarea includes the Towne Center mall, the largest retail area within a 5-mile radius.

Retail Pull Area Overlay Map

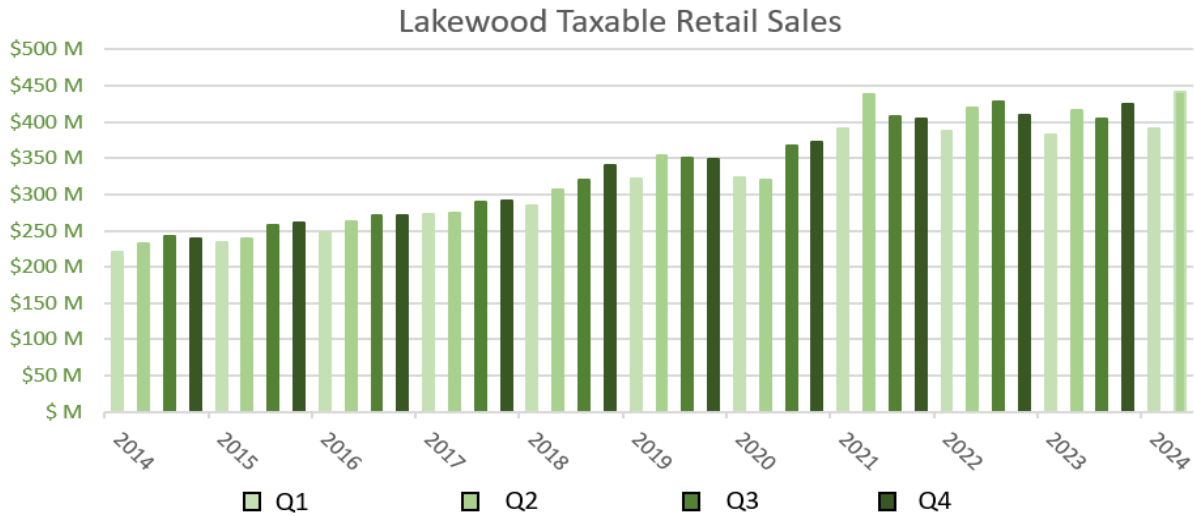


Almost every retail category is “over-represented” in Lakewood compared to the City’s population. Only Electronics and Appliance stores are “under-represented.”

Change in Pull Factors, 2014–2020								
NAICS	Description	2014	2015	2016	2017	2018	2019	2020
44-45	Retail Trade	1.16	1.21	1.2	1.22	1.29	1.32	1.31
441	Motor Vehicle and Parts Dealers	0.97	1.14	1.13	1.21	1.27	1.42	1.35
442	Furniture and Home Furnishings Stores	1.63	1.67	1.56	1.5	1.64	1.61	1.4
443	Electronics and Appliance Stores	0.76	0.82	0.76	0.74	0.77	0.78	0.72
444	Building Material and Garden Equipment	0.97	0.99	1.03	1.01	1.11	1.14	1.18
445	Food and Beverage Stores	1.59	1.49	1.41	1.4	1.5	1.6	1.74
446	Health and Personal Care Stores	1.46	1.28	1.13	1.06	1.13	1.21	1.2
447	Gasoline Stations	1.23	1.35	1.32	1.35	1.26	1.17	1.21
448	Clothing and Clothing Accessories Stores	1.04	1.09	1.03	1.07	1.19	1.23	1.23
451	Sporting Goods, Hobby, Music, and Book Stores	1.35	1.26	1.2	1.4	1.51	1.54	1.42
452	General Merchandise Stores	1.3	1.38	1.48	1.57	1.69	1.75	1.74
453	Miscellaneous Store Retailers	1.56	1.46	1.39	1.29	1.14	1.01	1.1
454	Nonstore Retailers	0.72	0.79	0.83	0.83	1.01	0.92	1.07
722	Food Services and Drinking Places	1.53	1.57	1.61	1.63	1.73	1.74	2.17
	Total Restaurant + Retail	1.23	1.27	1.27	1.3	1.37	1.39	1.41

Lakewood Taxable Retail Sales

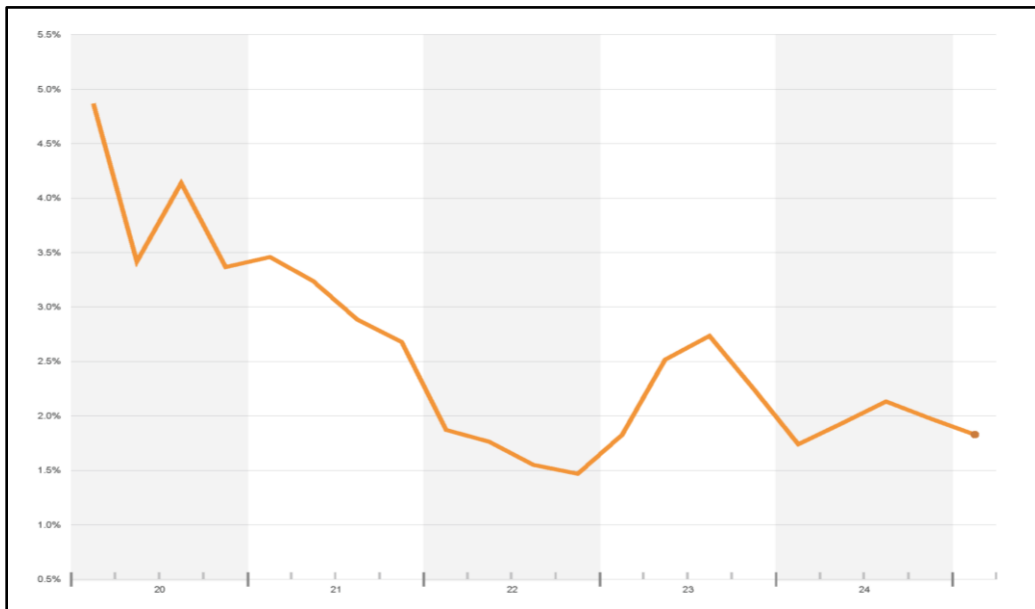
Taxable Retail Sales increased between 2014-2024 from \$200M to \$400M.



Source: Washington Department of Revenue

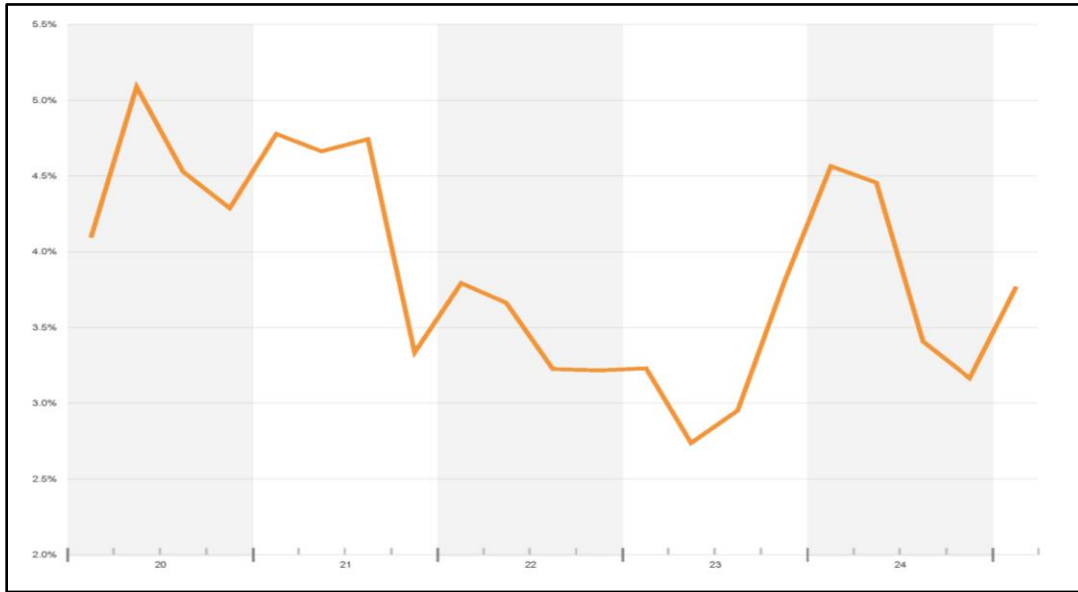
Vacancy Rates

Retail Vacancy Rate



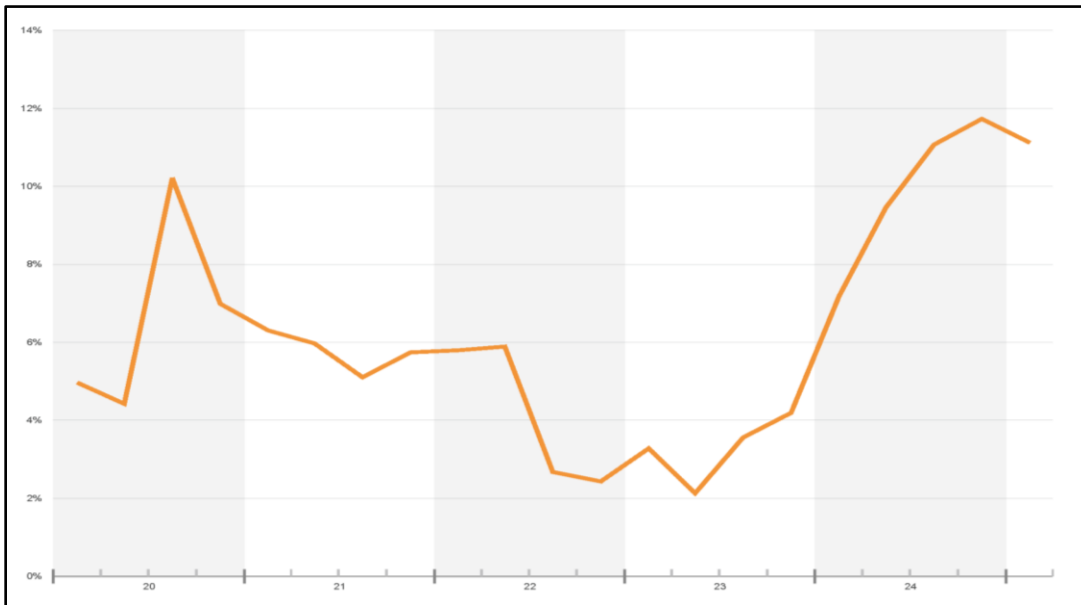
Source: CoStar

Office Vacancy Rate



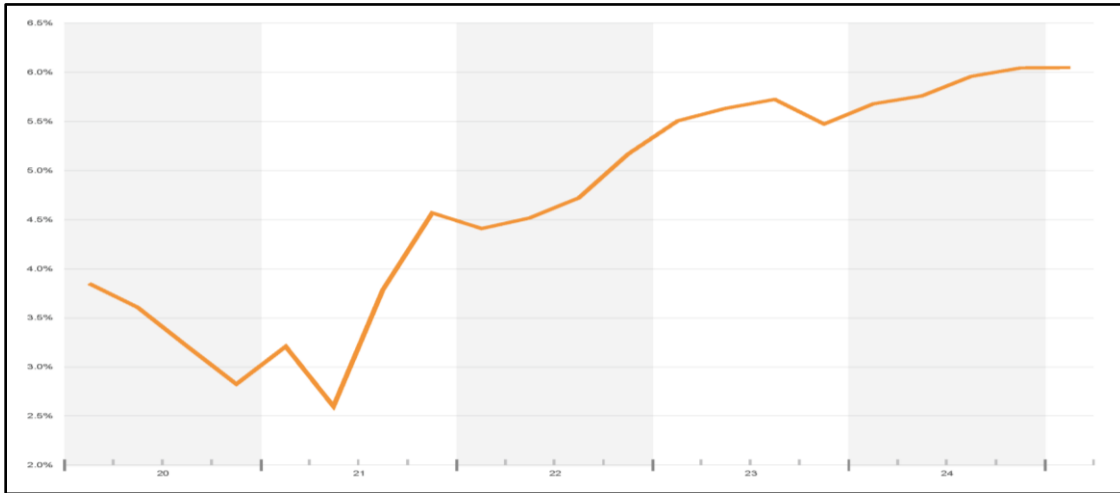
Source: CoStar

Industrial Vacancy Rate



Source: CoStar

Apartment Vacancy Rate

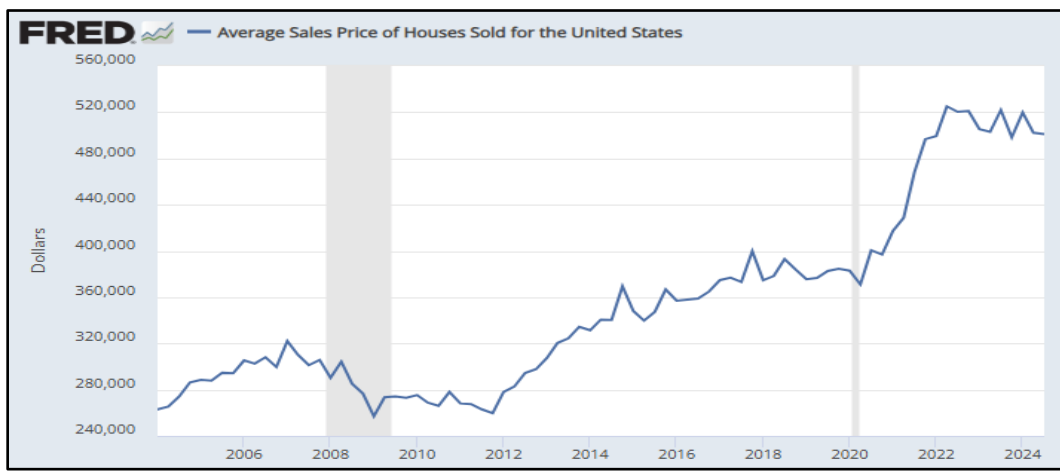


Source: CoStar

Housing

National housing prices dipped roughly 25% during the housing market crash of 2008. After 2008, housing prices rose steadily until the COVID-19 emergency. After recovery in 2020, housing prices increased at an incredible rate, rising 40% over two years. Housing prices have remained at this high-water mark for the since 2022.

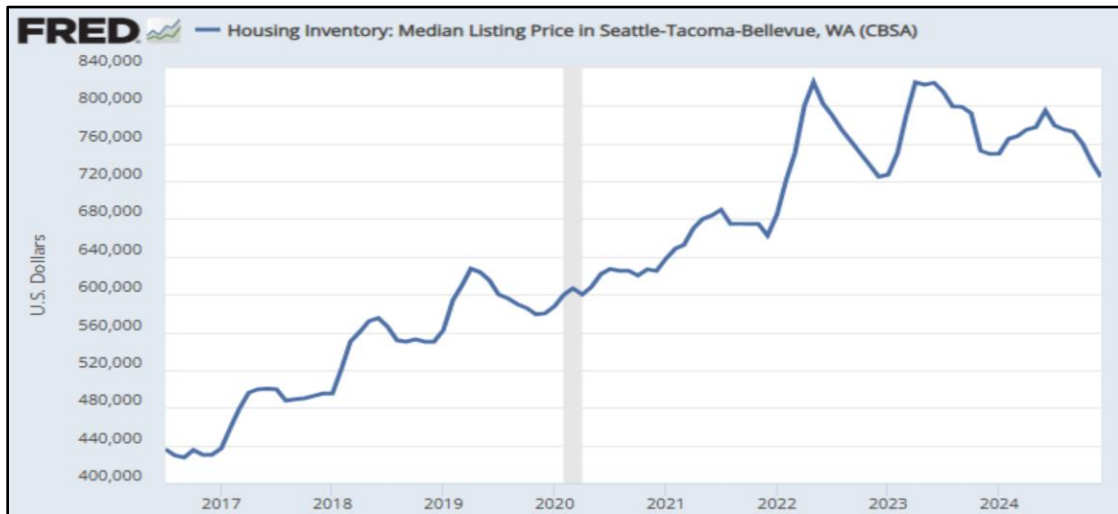
Housing prices is the single greatest barrier to achieving growth target goals in Lakewood. The high cost of development due to large parcels of undeveloped land, alongside increasing construction costs that cannot be fully covered by local rents or sales prices, limit the interest and ability for developers to build new housing units. Lakewood needs to add a large amount of housing stock that is affordable to people of all income levels. The City's MFTE program and other development incentives are essential to attracting developers and increasing housing stock in Lakewood.



Source: U.S. Census Bureau, U.S. Department of Housing and Urban Development

Regional Housing Market

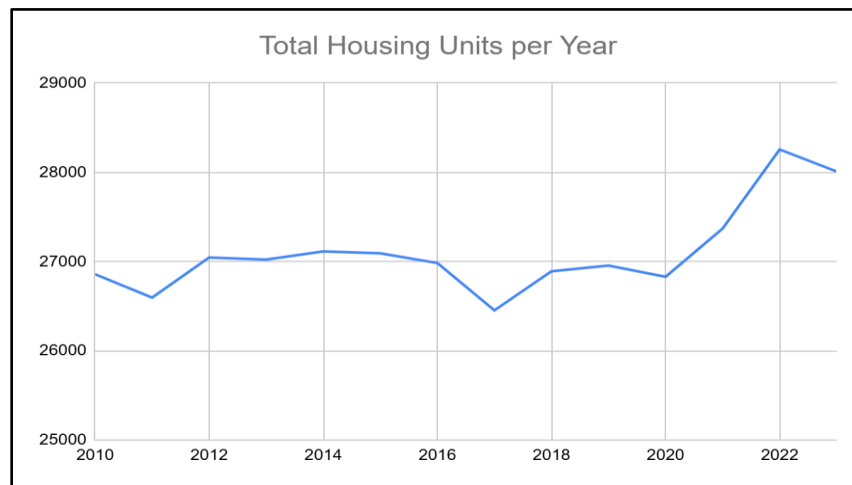
Home prices in the Seattle-Tacoma-Bellevue area have grown at a slightly lower rate than the national average: a 33% increase compared to the 40% national increase. Even so, the median home price in the Seattle-Tacoma-Bellevue area remains ~35% greater than the national average.



Source: U.S. Census Bureau, U.S. Department of Housing and Urban Development

Lakewood Total Housing Units by Year

Lakewood has added a total of roughly 1,200 housing units over the past 10 years.



Source: United States Census Bureau

Lakewood Housing Needs by 2044

In order to meet the City’s 2044 housing target of 9,378 new units, Lakewood’s historical annual construction rate needs to more than triple to approximately 470 units per year. Lakewood has adopted zoning and regulations to allow middle housing options and ADUs in historically single-family areas, but a significant share of the housing units will be built as higher density housing in Lakewood’s Downtown and Station District subareas. Mixed-use and multifamily developments will be critical to reaching 2044 housing targets. The City has taken, and continues to take, actions to incentivize building in the RUGC.

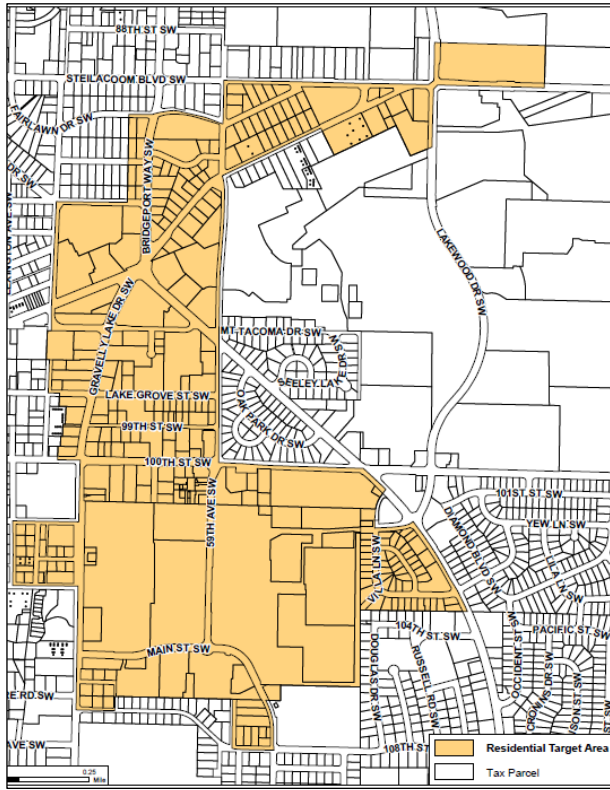
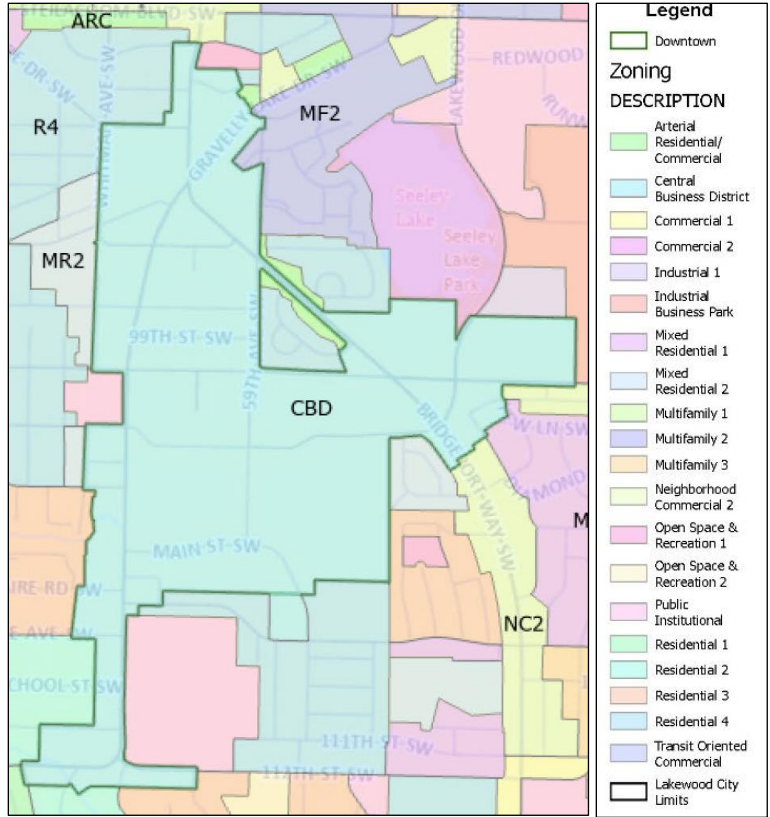
Housing Unit Needs by Income Level (% of Pierce County Area Median income (AMI))								
	Total	0-30% (extremely low)		30-50% (very low)	50-80% (low)	80-100% (moderate)	100-120%	120%+
		PSH*	Non-PSH					
'20 Estimate	26,999	588	101	4,565	11,699	4,347	2,250	3,449
'44 Allocation	9,378	1,212	1,367	1,739	1,375	592	536	2,287

The Downtown Subarea Plan assigned 2,257 new housing units by 2044 to the subarea. This represents a 24% share of Lakewood’s total new housing expected by 2044. Lakewood’s Downtown Subarea land use code commits to adding housing density by prohibiting single-family, two-family, and three-family dwellings and incentivizing mixed-use and multifamily housing.

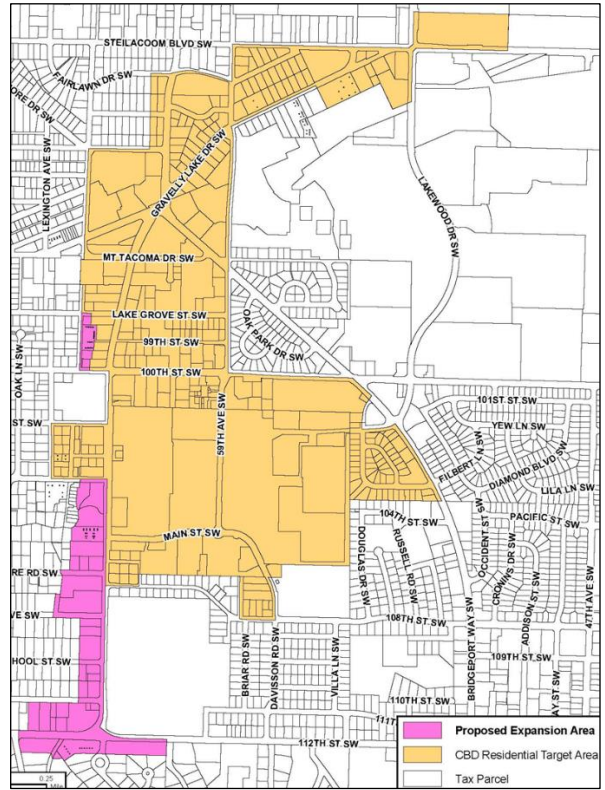
Lakewood encourages developers to build mixed-use and multifamily housing in the RUGC by offering Multifamily Tax Exemptions (MFTE) for market-rate and affordable housing units. The City previously designated a Residential Target Area (RTA) within a portion of the Downtown Subarea; in 2025, the City is considering the expansion of the RTA boundaries to further focus higher density development in the RUGC.

Multifamily Development in the RUGC

In February 2025, Lakewood’s Hearing Examiner approved a large multifamily master planned development in the Towne Center area of the RUGC. The project will redevelop approximately 10 acres of parking lot into 309 multifamily units. The project was evaluated using Lakewood’s Downtown Subarea land use code and meets the City’s policies regarding walkable and densified development.



2024 CBD RTA map



2025 Draft CBD RTA Expansion

Future Development & Redevelopment Actions

Action Plan

Issue	DSAP Policy	Actions
Increase public green space and community gathering areas	DS-5.3: Consider the use of the city's eminent domain powers to establish public streets and public open spaces in the Lakewood Towne Center.	Revitalize Colonial Theater/Motor Ave. area. Increase parks & green space.
Increase walkability and desirability of Downtown Subarea	DS-5.4: Maintain a pedestrian-orientation in building, site, and street design and development in the Central Business District.	Implement the Green Street Loop to provide multi-modal access across the Downtown Subarea. Expand and improve sidewalk and bicycle infrastructure.
Attract businesses in expected high-growth industries	EC-4.1: Promote mixed-use, high-density, infill development on vacant and underutilized parcels along commercial corridors, in the Downtown area, and in the Lakewood Station District.	Work with developers to build out empty units for desired growth industry sector businesses. Encourage mixed-use development.
Heavily increase rate of housing unit construction	DS-4.2: Provide increased densities and regulatory flexibility in Downtown development regulations to attract diverse housing for all ages, abilities, and incomes.	Provide more incentives to developers to build unit-heavy affordable housing developments, especially mixed-use.
Reclaim businesses lost to lengthy/difficult permitting process	LU-2.2: Maintain efficient permitting processes and development standards to help accommodate future growth.	Change permit process/occupancy requirements to remove barriers (time, complexity) to opening a business in Lakewood

Business Retention & Expansion Data

The City of Lakewood conducts Business Retention & Expansion (BRE) interviews as well as a yearly business survey to collect feedback about the business environment in Lakewood. Businesses are sampled at random to give their thoughts about the City, Economy, Transportation, and Issues that affect them doing business in Lakewood.

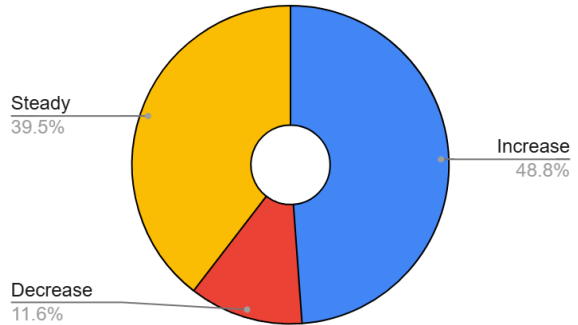
Survey Results are included on the following page.

2024 Business Retention & Expansion Findings

Businesses in Lakewood have been steadily more optimistic about the future every year since the COVID-19 emergency. Though businesses are feeling the effects of inflation and high interest rates on costs and consumer spending power, most businesses feel they will be able to adjust and weather the storm.

Businesses report that no B&O tax in Lakewood helps to keep them competitive with other businesses in the region. Hotels, restaurants, retail stores, healthcare providers, and social services providers are supported by demand created by Joint Base Lewis-McChord.

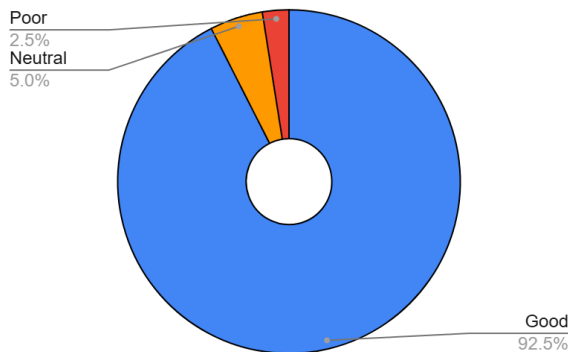
Do You Expect Business to Increase or Decrease Over the Next 12 Months?



Lakewood's great regional location is the most commonly reported comment about transportation in Lakewood. The City's sidewalk improvement program is almost universally supported by businesses and constituents.

The most commonly reported issue with transportation in Lakewood is traffic on I-5. There are several areas of the City that are underserved by public transportation, though most businesses report no issues with transportation in Lakewood.

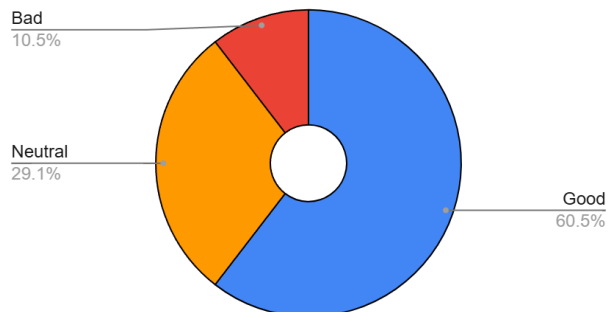
How is Transportation in Lakewood?



Many businesses report that Lakewood has improved greatly over the past 10-15 years. Even so, some businesses report that Lakewood still has a negative stigma regarding vagrancy and petty crime such as car break-ins and vandalism.

Lakewood will continue to improve walkability, cleanliness, and visibility of police patrols to combat any remaining negative stigma of this great City!

How do You Feel About Your Neighborhood?



2025-11 Review LMC 18A.40.110 (B)(1)(e) to consider amending the minimum square footage for accessory dwelling units (ADUs.)

In order to allow further flexibility in the City’s regulations and encourage additional affordable housing to be built consistent with state and City housing priorities and growth targets, adding this amendment to the 25CPA docket was approved by the City Council via Resolution 2025-03. Amendment 2025-11 directs the Planning Commission to consider reducing the City’s minimum square footage for accessory dwelling units (ADUs.)

Background

RCW 36.70A.680 and 36.70A.681 require all local governments planning under the Growth Management Act (GMA) to revise their regulations as needed to conform with the following requirement (among others):

- Maximum ADU size standard: Local governments may not require ADUs to be smaller than 1,000 gross square feet in size.

The following table includes the minimum and maximum sizes allowed for ADUs (attached or detached or both) from a number of Washington counties and cities.

In summary:

- 11 of the 15 cities have no minimum ADU size
 - o 1 city relies on state building code requirements for minimum size
 - o 1 city has a 300 sq.ft. minimum size and
 - o 2 cities (including Lakewood) have a 1,000 sq.ft. minimum size
- 2 of the 3 counties have no minimum ADU size
 - o 1 county has a 300 sq.ft. minimum size

Jurisdiction	ADU Minimum/Maximum Size
Lakewood	1,000 sq.ft. min size; 1,200 sq.ft. max
King County	No min. size; 1,000 sq.ft. max of heated floor area and 1,000 sq.ft. of unheated floor area generally
Pierce County	No min. size; 1,000 sq.ft. max.
Thurston County	300 sq.ft. min size; 800 sq.ft. max
Bellingham	1,000 sq. ft. min.
Bonney Lake	AADU 300 sq.ft. min; DADU 450 sq.ft. min, excluding any related garage and stair areas
Bremerton	No min. size; 1, 000 sq.ft. max or not more than sixty 60% of the principal unit's total habitable floor area, whichever is greater . . .
East Wenatchee	Min. size shall not be less than the requirements of the Washington State Building Code.
Everett	No min. size; 1,000 sq.ft. max (no max for an ADU located within one floor of a principal dwelling unit.)
Federal Way	No min. size; AADU may exceed 1,000 sq. ft. max in certain instances; DADU 1,000 sq.ft. max excluding any garage, workshop and similar nonliving areas.
Fife	300 sq.ft. min size; 900 sq.ft. max size and shall not exceed 30% of the total gross floor area of the primary dwelling unit (excluding garage) and proposed ADU
Lacey	No min. size; up to 50% of main residence and 850 sq.ft. max; other exceptions in code

Puyallup	No min. size; AADU 900 sq.ft. max of floor area or 40% of the floor area of the primary dwelling, whichever is less, nor have more than two bedrooms; DADU 700 sq.ft. max (new), or 900 sq.ft. (conversion), or 40% of the floor area of the new/existing primary structure, whichever is less.
Renton	No min. size; max. size varies per residential zone between 400 sq.ft. and 1,000 sq.ft.
Spokane	No min. size; AADU - principle dwelling must be 800+ sq.ft. and ADU can have 800 sq.ft. max size; DADU 75% of principle residence or 975 sq.ft. max. size
Tacoma	No min. size; 1,000 sq.ft. max excluding any garage area and other non-living areas
Tukwila	No min. size; AADUs may occupy a maximum of 40% of the square footage of the principal unit (excluding the area of any attached garage) or up to 1,000 square feet, whichever is greater. DADUs may be a maximum of 1,000 sq.ft.
University Place	No min.; 1,000 sq.ft max

AADU = Attached accessory dwelling unit / DADU = Detached accessory dwelling unit

The 1,000 sq.ft. ADU minimum size in the Lakewood Municipal Code predates the 2024 periodic review and recent state law requirements to allow ADUs in single family areas.

In order to further encourage ADUs as an affordable housing and alternative housing type option, **PPW is recommending removing the minimum ADU size but requiring that all ADUs (both attached and detached) comply with the International Building Code (IBC) or International Residential Code (IRC) as adopted by the City of Lakewood.** This reduction opens ADU design and size options up to property owners looking not only at “stick built” ADUs, but also modular or shipping container-based units.

The text of recommended amendments to the LMC follows the analysis below.

2025-11 Analysis per LMC 18A.30.050 (B)

1. Does the proposed amendment or revision maintain consistency with other plan elements or development regulations? If not, are amendments or revisions to other plan elements or regulations necessary to maintain consistency with the current final docket that will be considered by the Planning Commission and the City Council? **Yes.**
2. Is the proposed amendment or rezone consistent with the goals of the Comprehensive Plan? **Yes.**
3. Is the proposed amendment or revision consistent with the county-wide planning policies? **Yes.**
4. Does the proposed amendment or rezone comply with the requirements of the GMA? **Yes.**

2025-11 SEPA Analysis

1. Is the proposed amendment consistent with the county-wide planning policies, the Growth Management Act (GMA), other state or federal law, or the Washington Administrative Code? **Yes.**
2. Would the proposed amendment have little or no adverse environmental impacts and is the time required to analyze impacts available within the time frame of the standard annual review process? **This is a non-project action. There would be no adverse environmental impacts due to its adoption.**
3. Is sufficient analysis completed to determine any need for additional capital improvements and revenues to maintain level-of-service, and is the time required for this analysis available within the time frame for this annual review process? **This is a non-project action. There would be no adverse environmental impacts due to its adoption.**
4. Can the proposed amendment be considered now without conflicting with some other Comprehensive Plan established timeline? **Yes.**
5. Can the proposed amendment be acted on without significant other amendments or revisions not anticipated by the proponents and is the time required for processing those amendments or revisions available within the time frame of this annual review process? **This is a non-project action. There would be no adverse environmental impacts due to its adoption.**
6. If the proposed amendment was previously reviewed, ruled upon or rejected, has the applicant identified reasons to review the proposed amendment again? **N/A.**

PPW RECOMMENDATION: The PPW recommends approval of Amendment 2025-11.

18A.40.110 Residential Uses

* * *

B. *Operating and Development Conditions.*

1. Accessory dwelling units (ADUs) are permitted when added to, created within, or detached from a principal dwelling unit subject to the following restrictions:
 - a. Up to two (2) ADUs shall be allowed as accessory uses in conjunction with any detached single-family structure, duplex, triplex, townhome, or other housing unit. ADUs shall not be included in the density calculations. A lot shall contain no more than two (2) ADUs.
 - b. Lots designated with critical areas or their buffers shall be allowed up to one (1) ADU as an accessory use in conjunction with any detached single-family structure, duplex, triplex, townhome, or other housing unit.
 - c. An ADU may be established by creating the unit within or in addition to the new or existing principal dwelling, or as a detached unit from the principal dwelling.
 - d. The ADU, as well as the main dwelling unit, must meet all applicable

setbacks, lot coverage, and building height requirements.

e. The maximum size of an attached ADU contained within or attached to an existing single-family structure shall be limited by the existing structure's applicable zoning requirements. The maximum size of all other attached and all detached ADUs shall be no more than one thousand two hundred (1,200) square feet, excluding the garage.

f. The minimum size for both attached and detached ADUs shall be sufficient to comply with LMC Title 15.