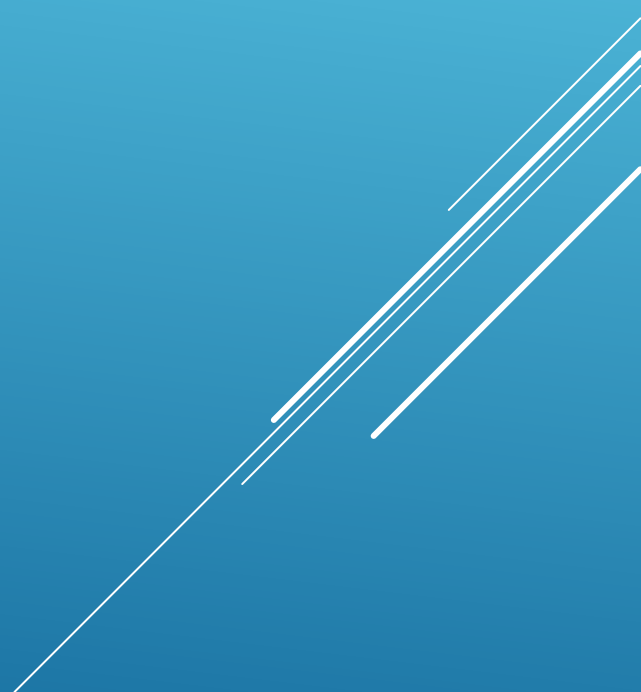



# REVIEWING GMA UPDATES TO THE COMPREHENSIVE PLAN AND EFFECTIVELY PROVIDING COMMENTS

Pierce County League of Women Voters  
November 16, 2023

# UPDATING THE COMPREHENSIVE PLAN

- ▶ Process for updating the comprehensive plan
  - ▶ Getting on the Record - How to draft effective comment letters and present testimony
  - ▶ What to look for in reviewing the draft updates to the comprehensive plan
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# COMPREHENSIVE PLAN UPDATE PROCESS

- ▶ Counties and cities fully planning under the Growth Management Act (GMA) must update their comprehensive plans and development regulations every 10 years
  - ▶ Pierce County and the cities must update their plans and regulations by December 31, 2024
  - ▶ The update must include planning to accommodate updated population projections provided by the Washington State Office of Financial Management
  - ▶ The update must include compliance with any new statutory requirements under the GMA since the last update
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# STEPS IN THE PUBLIC PARTICIPATION PROCESS – GETTING ON THE RECORD

## Planning staff

- Public outreach through open houses, workshops, etc.

## Planning Commission

- Public comment on staff recommendations for plan revisions and DEIS to Planning Commission
- Final Planning Commission recommendations and FEIS to Council

## City/County Council

- Public comment on Planning Commission recommendations before Council
- Final decision

# PIERCE COUNTY UPDATE TIMELINE

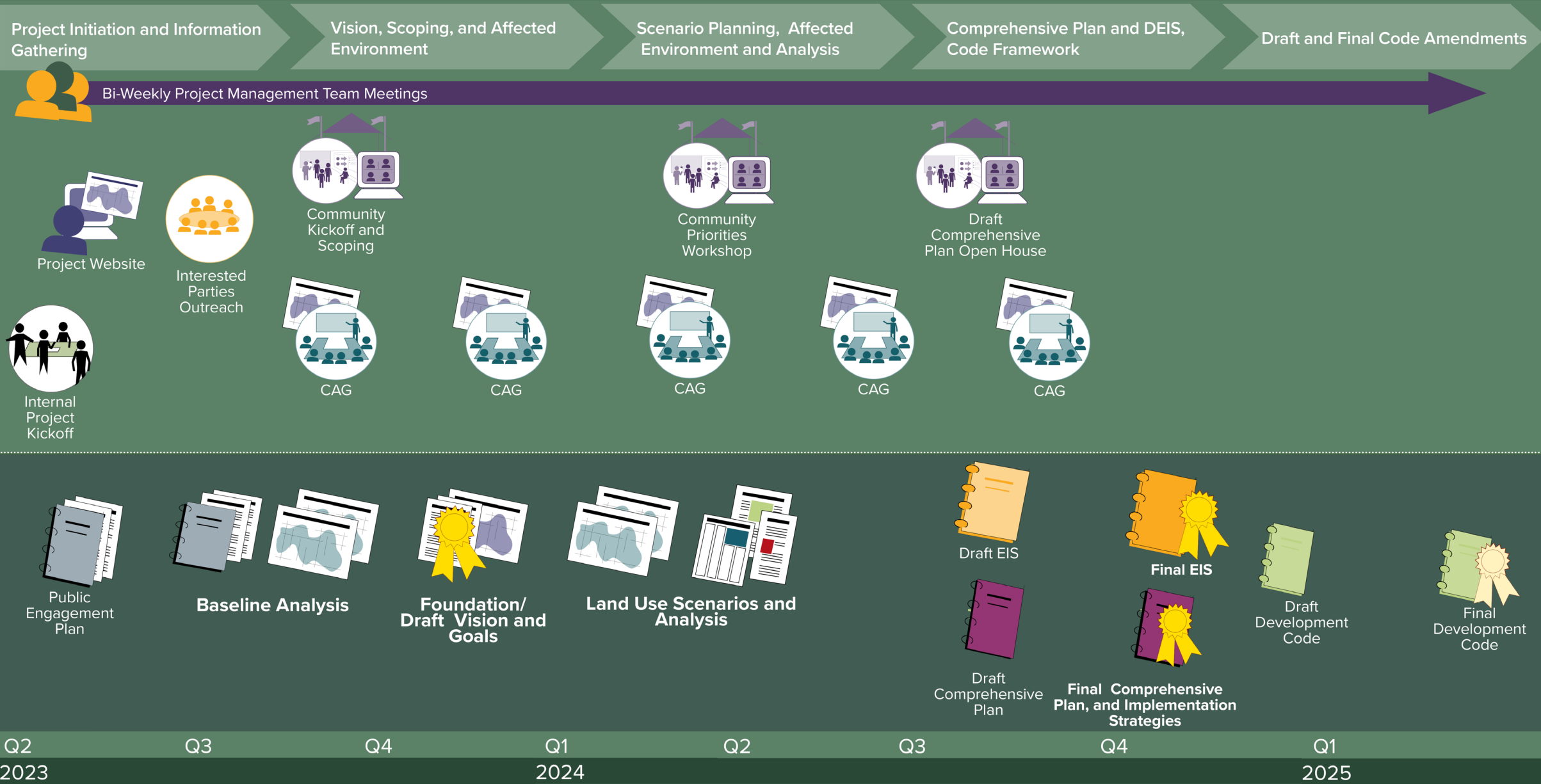
## Next Steps



Dates are tentative, visit [PierceCountyWa.gov/CompPlan](https://PierceCountyWa.gov/CompPlan) to receive updates or monitor the project schedule.

# Puyallup 2044 Comprehensive Plan: Process and Schedule

June 2023



# COUNTY AND CITIES' UPDATE INFORMATION

- ▶ Pierce County Comprehensive Plan – web page with update information <https://www.piercecountywa.gov/950/Comprehensive-Plan>
- ▶ Tacoma – 2024 GMA Update on December 6, 2023 agenda for discussion
- ▶ Puyallup – [web page for update](#)
- ▶ Gig Harbor 2024 Comprehensive Plan Update [web page](#)



# REVIEWING THE UPDATE REVISIONS

- ▶ Read the proposed changes to the plan – good tools for review are Commerce's Comprehensive Plan checklists on the [Growth Management Act Periodic Update web page](#) (an updated Housing checklist will be available in the next couple of weeks)
- ▶ Make a list of issues and questions – with a list of questions you can call the planner to go over them. This reminds the planner you are paying attention and may dispense with some review items without spending any further time on them.
- ▶ Think about asking for more than what the county/city is proposing. Just because the letter of the GMA does not require something does not mean it is not a good idea or is not within the spirit of the law.



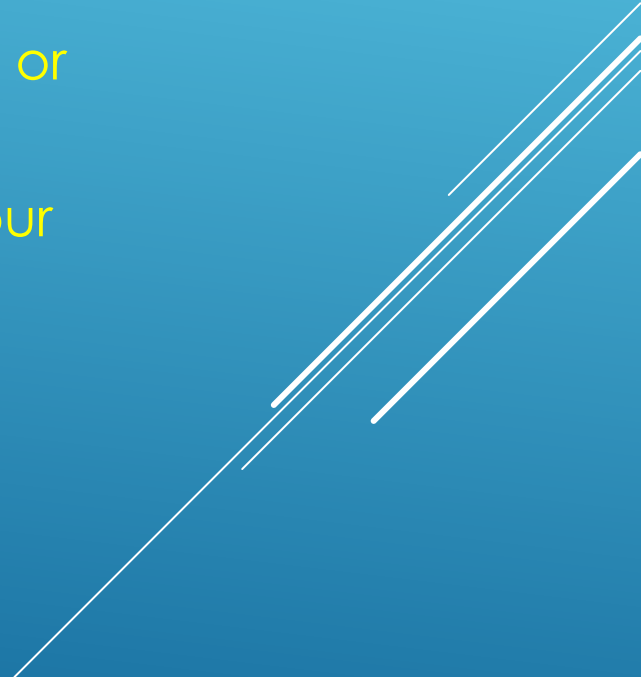
# GETTING ON THE RECORD

- ▶ Important to get on the record with both the Planning Commission and the Council – both are required to take public comment. The proposed plan amendments will be revised by the planning commission prior to sending them to the council.
- ▶ Comments can be submitted in letters or oral testimony. Oral testimony should also be written and given to the staff for Planning Commission and Council
- ▶ Comments can be used by other participants in appeals
- ▶ Even though the statute requires 60 days to comment, don't assume that you will get that amount of time

# WRITING EFFECTIVE COMMENT LETTERS – BE CLEAR

- ▶ Create a format that is easy to follow
- ▶ Use headings that clearly introduce each topic – e.g. Housing Element
- ▶ Start out with any positive comments you have. Counties and cities need public support for doing the right thing.
- ▶ Get on the same page with your reader, literally - make clear references to which sections you are commenting upon with the heading or first sentence of the segment, section titles and numbers, and page numbers
- ▶ If you are requesting wording changes, use ~~strikeout~~ and underline to clearly indicate what you are requesting

# WRITING EFFECTIVE COMMENT LETTERS – BE CONVINCING

- ▶ Clearly state each issue or concern. Be as specific as possible.
  - ▶ Provide a factual basis that will demonstrate the issue
  - ▶ Connect the facts of the issue to technical information, the statute or rule, or the public policy reasons supporting your position
  - ▶ If possible, suggest an alternative approach that would address your concerns
  - ▶ Conclude your argument with a cogent conclusion
  - ▶ If you are recommending changes, suggest alternative language
- 
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# PRESENTING ORAL TESTIMONY

- ▶ Be clear and concise
- ▶ Be prepared to limit your remarks to 3 minutes
- ▶ Be respectful. Don't let planning commission or council members draw you into an argument
- ▶ Bring a copy of your testimony for staff to put into the record, especially in case your time is limited or you are unable to testify due to time constraints

# EXAMPLE COMMENT LETTER FORMAT - SUPPORT

- ▶ What I support in the plan update:

- ▶ Housing Element

- ▶ Section 1.A. - Provisions for allowing permanent supportive housing in the central area that will allow families to locate near needed services
    - ▶ Section 6.B. - Allowing increased density in single family neighborhoods, including more ADUs, duplexes and triplexes will increase density in an area with adequate infrastructure and access to transit

- ▶ Transportation Element

- ▶ Section 8.C - New transit stations and road improvements are planned along with higher density development, including multi-family apartments, condominiums, and a business district, in the Hillside and South Beach neighborhoods

# EXAMPLE COMMENT LETTER FORMAT – IMPROVEMENTS TO THE PLAN

- ▶ What is needed to strengthen the plan:
  - ▶ Transportation Element - Better access to high capacity transit should be planned in the Oak Creek neighborhood where much higher housing density is proposed.
  - ▶ Capital Facilities Element - Planning for amenities such as pedestrian safety improvements, access to nearby services, and parks should be included in the South Central and East Side areas with increased density to support more walkable communities.
  - ▶ Land Use Element - Policy 4.A requires accessory dwelling units (ADUs) to have off street parking. In order to encourage infill development with ADUs, off street parking should not be required.

# LEAGUE OF WOMEN VOTERS POSITION PAPERS

- ▶ Tacoma Pierce County League of Women Voters has position papers posted on their website to support planning under the GMA that can be used as a resource to draft comments:
  - ▶ [Affordable Housing & Shelter](#)
  - ▶ [Transportation](#)



# LWV FOCUS ON INCREASED HOUSING DENSITY WITH AMENITIES

- ▶ Housing Element – are housing needs and targets clearly identified consistent with state and county allocations?
- ▶ Land Use Element:
  - ▶ Is the county/city upzoning in residential areas to allow sufficient density to meet housing needs consistent with new requirements?
  - ▶ Are amenities and services planned to support the increased density – i.e., access to transit, parks, and services (grocery stores, medical offices, banks, schools, etc.)?
- ▶ Capital Facilities Element – is adequate infrastructure planned with identified funding sources to support increased densities?
- ▶ Transportation Element – is adequate transportation planned concurrent with development? Will transit be available within walking distance of high density and lower-income housing?

# REVIEWING THE COMPREHENSIVE PLAN – MUST BE INTERNALLY CONSISTENT

- ▶ Land Use Element – land use designations that increase density through types of allowed housing and units per acre, as well as other land uses to support housing – services and amenities
- ▶ Housing Element – inventory of needs and housing targets. Must plan for .....
- ▶ Capital Facilities Plan – adequate water, sewer and infrastructure is in place or planned to support increased density
- ▶ Transportation Plan – adequate transit and roads to support increased density
- ▶ Utilities Element
- ▶ Economic Development Element
- ▶ Parks and Recreation Element
- ▶ Climate Change and Resiliency Element
- ▶ Rural Element

# NEW GMA HOUSING ELEMENT REQUIREMENTS (E2SHB 1220)

- ▶ Conduct an inventory and analysis of all housing needs – by income, PSH and emergency housing (County #s from Commerce allocated by Pierce County to the cities)
- ▶ Identify sufficient capacity of land for identified housing needs
- ▶ Include policies to support “middle housing” in urban growth areas, including but not limited to duplexes, triplexes and townhomes
- ▶ Make adequate provisions for all housing needs, including documenting barriers to housing availability such as gaps in local funding, development regulations, etc.
- ▶ Address racially disparate impacts, displacement, exclusion and displacement risk in housing through policies and regulations

# Pierce County Planning Projections – New Units Needed by 2044

Jurisdiction	Total	Permanent Housing Needs by Income Level (% of Area Median Income)							Emergency Housing (Beds)
		0 - 30%		>30-50%	>50-80%	>80-100%	>100-120%	>120%	
		PSH	Non-PSH						
Pierce County Total	111,513								
Unincorporated County	32,048	4,140	5,594	5,943	4,697	2,022	1,833	7,817	1,961
Tacoma	42,865	5,538	7,483	7,949	6,283	2,705	2,452	10,455	2,624
Lakewood	9,378	1,212	1,637	1,739	1,375	592	536	2,287	574
Puyallup	7,482	967	1,306	1,388	1,097	472	428	1,825	458
University Place	5,620	726	981	1,042	824	355	321	1,371	344
Edgewood	2,397	310	418	445	351	151	137	585	147
DuPont	2,096	271	366	389	307	132	120	511	128
Gig Harbor	892	115	156	165	131	56	51	218	55



# NEW GMA MIDDLE HOUSING DENSITY REQUIREMENTS (HB 1110, 1337 AND 1042)

- ▶ Must allow at least 3 units per parcel in all urban areas, and at least 6 units in some cities near transit or with affordability
- ▶ Must document calculation of capacity to meet assigned target
- ▶ Must limit SEPA appeals
- ▶ Existing covenants may restrict development
- ▶ Limits to parking requirements
- ▶ **Commerce must publish a model ordinance that will supersede, preempt and invalidate local development regulations that are not in compliance by the June 30, 2025 deadline.** Model ordinance is out for public comment by December 6, 2023. Final model ordinance will be published in January 2024.

# KEY TAKE-AWAYS FROM NEW REQUIREMENTS

- ▶ Permanent supportive housing must be allowed in cities in any zones in which residential dwelling units or hotels are allowed
- ▶ Cities must allow middle housing - duplexes, triplexes, fourplexes, fiveplexes, sixplexes, townhouses, stacked flats, courtyard apartments and cottage housing
- ▶ Cities must plan for an increase in housing by income levels based on state and county allocations
- ▶ There are consequences if cities do not adopt regulations to allow middle housing consistent with new requirements – the state model ordinance controls until the city comes into compliance with the requirements

# DEPARTMENT OF COMMERCE RESOURCES FOR REVIEWING THE COMPREHENSIVE PLAN UPDATE

- ▶ The Short Course on Local Planning – video presentation with an overview of state planning laws, planning under the GMA, and the roles in planning and best practices for public participation. Upcoming presentations via Zoom – Wednesday November 29, 6-9 p.m.; and Thursday December 19, 1:00 – 4:00 p.m.
- ▶ Planning for Housing – General information on the Housing Element.
- ▶ Updating GMA Housing Elements – Guidance on planning for housing under the GMA, including new statutory requirements.
- ▶ Middle Housing in Washington – Fact sheet for Implementing E2SHB 1110, Model ordinances by January 2024



# TECHNICAL ASSISTANCE OFFER

- ▶ Draft template letter members can use (in process)
- ▶ Do research on specific topics
- ▶ Review and provide input on draft comment letters and oral testimony
- ▶ Heather Ballash, [marcusroening@harbournet.com](mailto:marcusroening@harbournet.com)