

# HOW TO DEVELOP WRITTEN COMMENTS OR TESTIMONY REGARDING A PROPOSED COMPREHENSIVE PLAN UPDATE (Pierce County ONLY Version)

## Points to Remember:

- Only the President, Rosemary Powers, may send comments in the name of the League
- All others send their testimony as individuals (who support League positions)

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## BACKGROUND

### Comprehensive Plan Chapters

Categories included in the plans are mandated by the state Growth Management Act and include:

- Land Use
- Housing
- Capital Facilities Plan
- Utilities
- Rural Land
- Transportation
- Economic Development
- Parks and Recreation
- Climate Change and Resiliency

You can use summaries provided by the League to comment about what to support or to request changes for in each chapter of specific jurisdictions' plans.

**NOTE: Pierce County has chosen to explore two alternatives to no action for the comprehensive plan update. Some parts of the plan are different between Alternative 2 and Alternative 3, and some are the same. You may want to comment on what you like in each alternative and what you would to see changed. The County is currently developing a hybrid of the two alternatives that will be sent to the Planning Commission for hearings in April.**

## Background and Resources - Housing

LWVTPC has been working on the need for affordable housing and solutions to homelessness for seven years. For that reason, housing is the first element to consider in each plan. Counties have some new requirements and some policy options for planning for affordable housing due to recent legislation.

**Planning for and accommodating 20-year population allocations (required):** In 2021 the Washington State Legislature amended the GMA to require counties and cities to plan for and accommodate housing affordable to all income levels. Washington Department of Commerce was directed to provide existing and future housing needs for communities in Washington by income bracket. Pierce County used this information to allocate projected housing needs to each of the cities and to the unincorporated UGA. Pierce County's allocation by income bracket for the unincorporated UGA is as follows.

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	32,048	4,140	5,594	5,593	4,697	2,022	1,833	7,817	1,961

**Accessory dwelling units (required):** In 2023 the Legislature amended RCW 36.70A.696 to require that, within urban growth areas, cities and counties allow two accessory dwelling units on all lots in zoning districts that allow single-family homes. This will be required by June of 2025. See <https://deptofcommerce.app.box.com/file/1307319992684?s=cnuqx6zm0zvku2a4lbox2iwdielg6> for more information.

**Middle Housing (policy option):** In 2023 the Legislature also passed E2SHB 1110 (HB 1110), which substantially changes the way many cities in Washington are to plan for housing. HB 1110 requires cities of certain sizes and locations to allow multiple dwelling units per lot in a "middle housing" type of form. 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, four-plexes, five-plexes, six-plexes, townhouses, stacked flats, courtyard apartments, and cottage housing." While HB 1110 does not apply to counties, allowing middle housing types of forms is a policy option for counties inside the urban growth area.

**Other policy options:** Offering incentives for affordable housing is also a policy option. Cities can choose to allow use of the Multi-Family Tax Exemption, density bonuses, expedited permitting, and reduced zoning as incentives. They can choose to allow use of the Multi-Family Tax Exemption for all qualifying multi-family development, or they can limit it to low-income housing. League of Women Voters Tacoma-Pierce County has taken the position that all of these incentives be reserved for housing that increases housing stability for low-income households and reduces homelessness for all.

**Housing Checklist:** Department of Commerce has recently published an Expanded Housing Checklist for local planners to meet GMA housing requirements on its [Updating GMA Elements web page](#). It can

be used for review of the draft Housing Element updates. You will need to download Box to access the checklist.

#### Background and Resources – Climate Mitigation and Resiliency:

The Washington State Legislature also passed HB 1181 in 2023. This mandates that counties and cities address climate change in their comprehensive plan updates. For more information on this topic, Commerce has a resource [web page](#) regarding implementation of the climate change legislation.

## SAMPLE LETTER

The model letter that follows can be used to write letters to the county planning commission or council regarding draft updates to the comprehensive land use plan. **It should NOT be used as a form letter to be sent as is.**

The introductory paragraphs are based on statewide information regarding housing and positions that the League of Women Voters of Tacoma-Pierce County has taken regarding Shelter & Affordable Housing, and Transportation. See these LWVTPC positions [here](#).

The subsequent sections are a suggested format for submitting comments in three sections:

- What you like about the plan options – Alternative 2 and Alternative 3
- What you don't support in Alternatives 2 and 3

What you put in these sections will be based on what is actually in the draft updates to the plan. This is just an example of how you might write a comment letter.

## SAMPLE TEXT OF LETTER TO COUNTY PLANNING AND PUBLIC WORKS DEPT.

DATE

Pierce County Planning and Public Works  
ATTN: Long Range Planning  
2401 S 35th St, Room 2  
Tacoma, Washington 98409

Dear Long Range Planning Staff:

Thank you for the opportunity to comment on the County's draft comprehensive plan update. I appreciate the work that the County has done to encourage more housing opportunities and address the issue of housing affordability.

An increasing gap between wages and housing costs has contributed to a crisis in housing affordability. And the things we all love about this city/county have attracted a growing population, increasing the demand for and cost of housing. To meet the current shortage and next 20 years of growth, additional homes are needed in the County. I understand that the Growth Management Act (GMA) now requires cities and counties to plan for and accommodate housing for households in every income bracket, including zoning and land capacity and provide for shelters for unhoused individuals. Currently, 36% of Washington's households are cost-burdened, spending more than 30% of their monthly income on housing costs like rent.

As residents of this region, we also know that only households that earn above 120% of the Area Median Income (AMI) can generally afford a detached single-family house today in Washington. Creating more housing for people in this bracket frees up homes for people in lower brackets. Middle income households earning 50-120 % of AMI may be able to afford smaller units such as accessory dwelling units (ADUs) or townhouses. Allowing smaller units such as ADUs, townhouses, duplexes, triplexes and fourplexes in single family residential zones can provide more affordable housing for middle income households.

I support planning for higher densities and inclusionary housing in the urban growth area because it can increase the amount of affordable housing stock for all income levels. Housing for the lowest-income segments can also be provided through inclusionary housing - requiring a percentage of new development be income-restricted.

I support inclusive development to reduce the negative effects of gentrification and the disproportionate impacts of gentrification on communities of color. Methods I also support include but are not limited to community benefits agreements, land value capture, and removal of land speculation incentives. *[Note: If the updated plan actually includes inclusionary zoning or any of the other methods listed, you can put your support comments in the next section under what you like about the plan, instead of in this introduction.]*

I support higher density housing development in the urban growth area because it has many additional benefits. Higher density concentrated in urban areas reduces urban sprawl by reducing the pressure to develop farm and forestland. It reduces the cost of providing capital facilities such as sewer, water and roads, and it reduces stormwater runoff into Puget Sound. It reduces vehicle miles traveled, traffic congestion, and pollution. It also reduces the emissions from transportation that are the greatest source

of greenhouse gases contributing to climate change in Washington State. Higher density, especially near transit centers, provides increased access to public transportation. Higher density with amenities such as parks, bike and walking trails, and nearby services increases the walkability and liveability of neighborhoods.

## Optional Paragraphs

### 1. What I support in the proposed plan:

- Land Use Element:
  - Alternative 2
    - Increases density throughout the urban area, including the High Capacity Transit area (HCT), to support housing affordability and access to transit.
    - Allows gross density calculations in the urban area.
    - Removes the urban sensitive overlay now that the County has a critical areas ordinance.
  - Alternative 3
    - Allows increased density to create a high-density, walkable core of development in the HCT under Alternative 3.
    - Retracts the UGA in areas not characterized by urban growth.
    - Eliminates rural density bonuses to slow growth in rural and resource areas.
    - Allows for infill development to be exempt from environmental review in the HCT area only.
- Housing Element:
  - H-1.1 The plan allows middle housing such duplexes, townhomes, accessory dwelling units (ADUs), cottages, multi-plexes, and other innovative types of housing
  - H-1.4 The plan encourages multifamily residential development with incentives such as bonus density, increased building height, multifamily housing tax incentives, reduced parking requirements, and other measures.
  - Goal H-8 The plan now allows mobile home parks in areas where other single-family housing is allowed.

### 2. What needs to be revised or addressed in the plan:

- Land Use Element:
  - Develop a hybrid alternative that incorporates the positive aspects from Alternatives 2 and 3.
- Housing Element: *[Note: These are included if the county has NOT met the new housing requirements, in which case the first two bullets in the Housing Element above under “What I support” would NOT be included in the letter.]*
  - The plan should be revised to allow all of the types of housing as required by new GMA legislation in the HCTs. ADUs and fourplexes should be allowed.
  - The plan should require that multifamily housing tax incentives be provided for low-income housing.

Thank you for your consideration.

Respectfully,

Jane Denver  
1234 Morning Lane  
Tacoma, WA