


PIERCE COUNTY COMPREHENSIVE PLAN UPDATE 2024

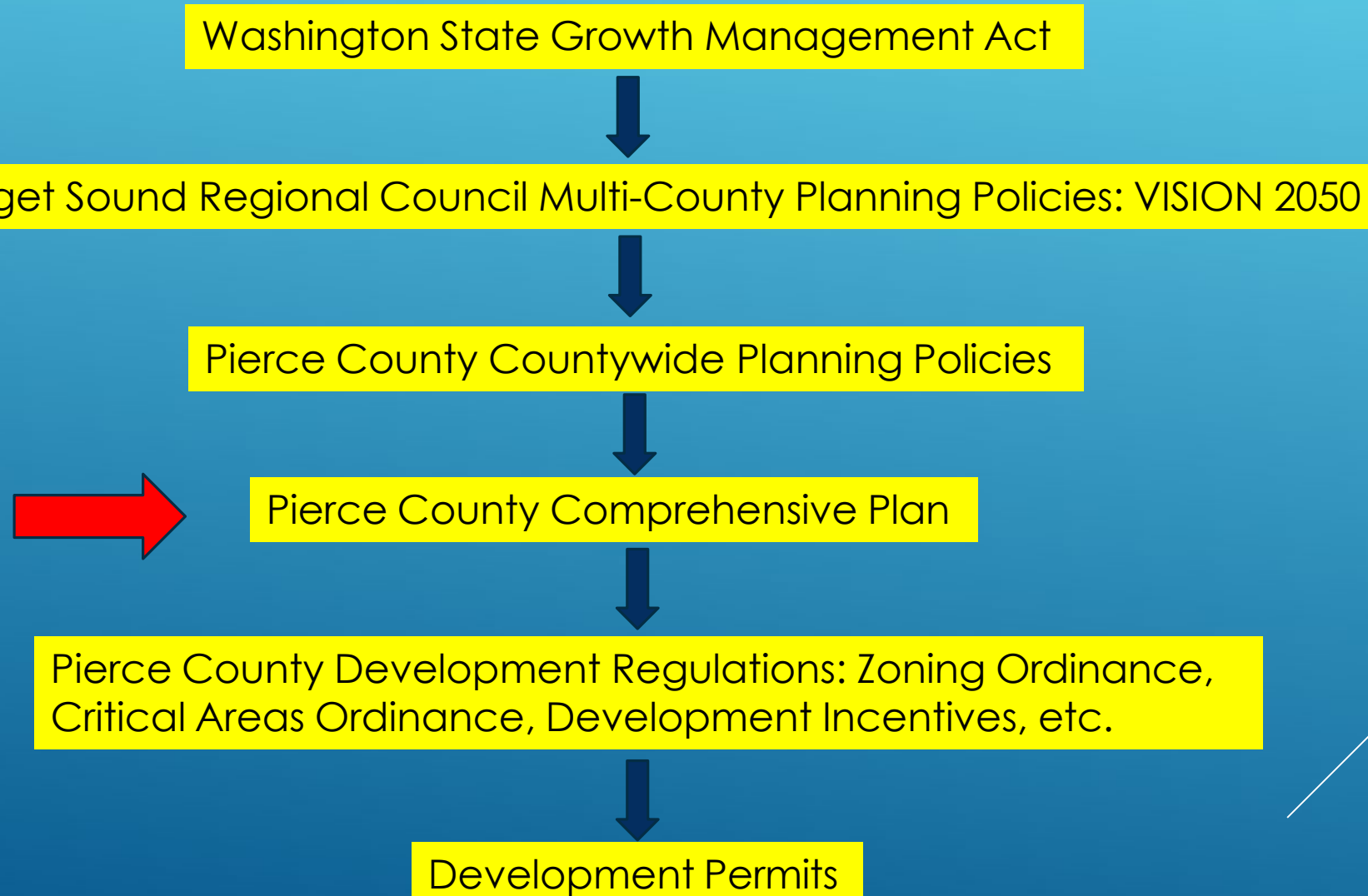
Providing Written or
Oral Comments
February 17, 2024



Overview

- Background – Where we are in the planning update process
- Regulatory context
- Resources Cynthia has provided for reviewing and commenting on the update
- Overview of sample letter formatted for Pierce County

PIERCE COUNTY PLANNING REQUIREMENTS

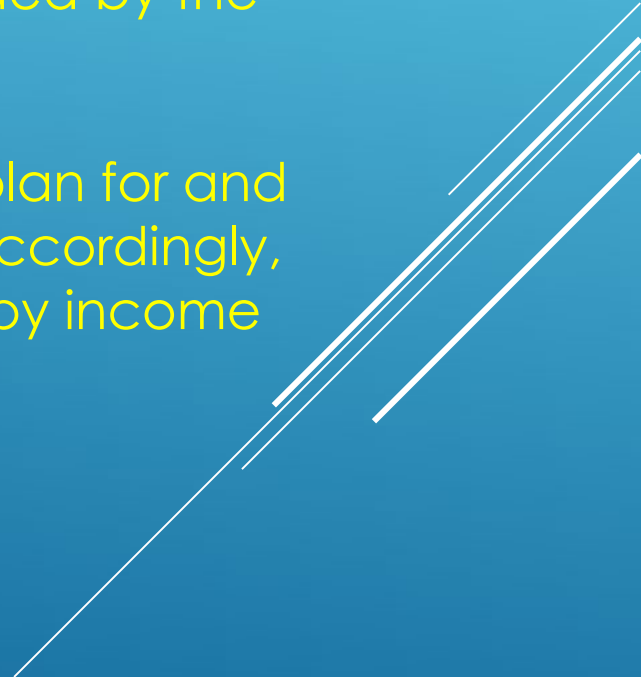


20-Year Comprehensive Plan Update

GMA requires all counties and cities to update their 20-year comprehensive plans every 10 years

Pierce County and the cities are required to update their plans for the next 20 years by December 2024. They must use 20-year population projections provided by the Washington State Office of Financial Management.

Pierce County and the cities are required to assess housing needs and plan for and accommodate housing for all economic segments of the population. Accordingly, Pierce County is required to develop planning projections for new units by income needed for 2044.

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Pierce County County-wide Planning Policies

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

PIERCE COUNTY UPDATE TIMELINE

Comprehensive Plan Periodic Review and Update Schedule June 2023

	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D			
	2022										2023										2024																
Public Engagement Periods (S*- Scoping)							S*				CAO/ BAS												Drafts										Final Adoption				
Comprehensive Plan Updates																																					
Project Initiation																																					
Draft Amendments																																					
Climate Vulnerability As.																																					
Disparate Housing As.																																					
Refine Amendments																																					
Environmental Impact Statement																																					
Scoping & Alts																																					
Draft EIS																																					
Final EIS																																					
Capital Facilities Plan																																					
Project Initiation																																					
Plan Preparation																																					
Plan Refinements																																					
Critical Areas Review																																					
BAS Review																																					
Draft Regulations																																					
Refine Regulations																																					

All dates are tentative

+ specialized engagement period

Opportunities to Comment

➤ Pierce County Planning Commission

- Letters due to planning staff on February 26, 2024 for draft Comprehensive Plan Elements and Draft Environmental Impact Statement (DEIS)
- Hearings for oral testimony on draft Comprehensive Plan in early April 2024
- NOTE: Based on written comments on the DEIS, staff will develop a preferred alternative

➤ Pierce County Council

- Deadline for comment letters TBD
- Hearings for oral testimony TBD

DRAFT EIS Alternatives Being Considered

Alternative 1: No Action. (Doesn't meet county allocation targets for low income housing)

Alternative 2: Increase density throughout the urban area, including the High Capacity Transit (HCT) area, to support housing affordability and access to transit.

Alternative 3: Increase density to create a high-density, walkable core of development in the HCT, but reduce capacity outside the HCT. (Doesn't meet county allocation targets for low income housing)

PUBLIC REVIEW PROCESS – WHERE WE ARE

Draft Plan Update Elements and Draft Environmental Impact Statement issued
on January 10, 2024
for Public Review and Planning Commission



Public comment letters to Planning Commission due
February 26, 2024



Planning Commission Hearings to hear public comment
(TBD)



Public comment letters to Pierce County Council and Council hearings



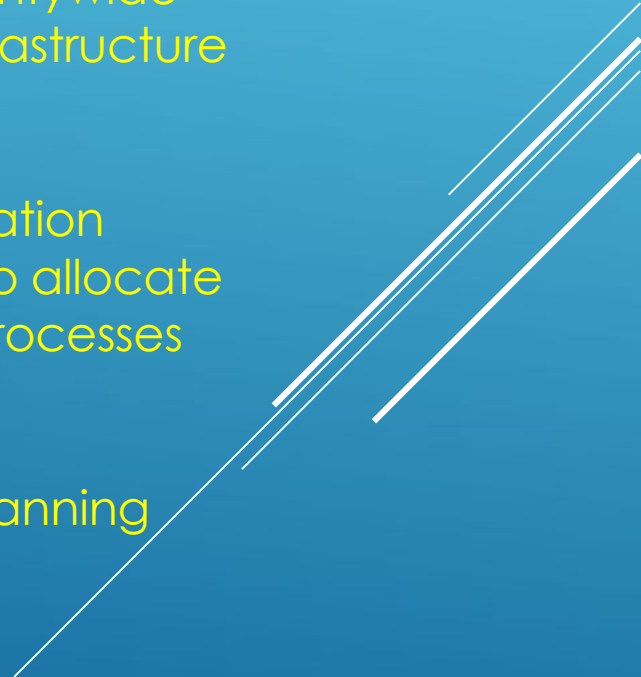
Council adoption of amendments

Pierce County Planning Commission Public Review

Pierce County Comprehensive Plan Update Website: <https://www.piercecountywa.gov/950/Comprehensive-Plan>

- Initial drafts for Planning Commission and Public Review issued on January 10, 2024
- Planning Commission staff briefings on plan elements:
 - January 9, 2024 staff briefing on Climate Change and Environment (Note: Climate Change has been incorporated into each of the draft elements rather than being a separate element)
 - January 23, 2024 Staff briefing on Land Use, Housing, Community Design and Economic Development Elements
 - February 13, 2024 Staff Briefing on Capital Facilities Plan and Transportation
 - Hybrid EIS alternative meeting on January 30, 2024.
- **Public review written comments due by 4:30 p.m. on February 26, 2024 on draft plan update and DEIS – email to CompPlanUpdate@PierceCountyWa.gov**
- Planning Commission public hearings are scheduled for early April 2024

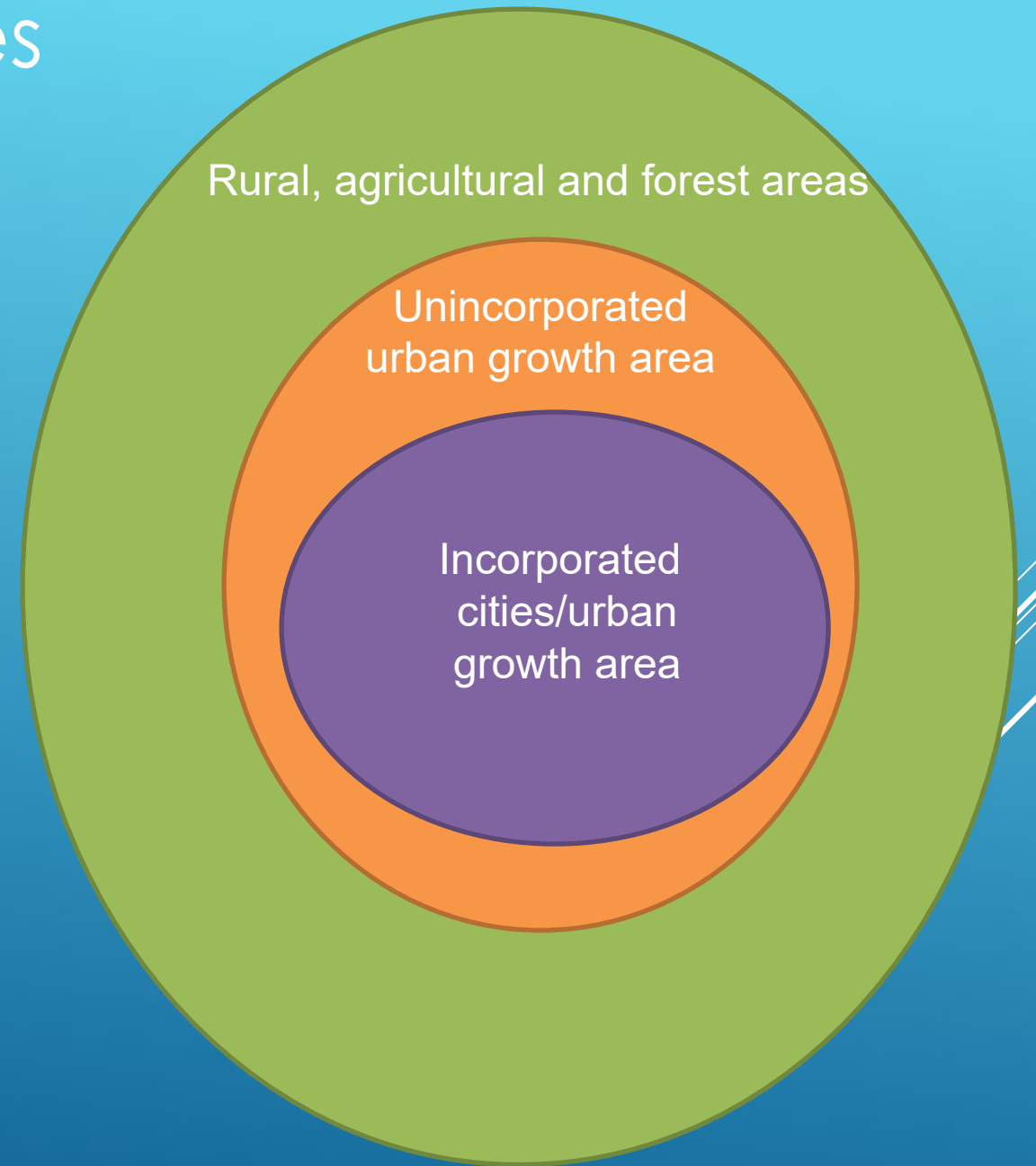
Regional Coordination of Comprehensive Plans And Countywide Planning Policies

- Cities and counties must coordinate their comprehensive plan with any other city or county with which it shares a common border.
 - Counties, in cooperation with cities within their boundaries must adopt countywide planning policies to create a framework for where population growth and infrastructure investment will be directed for the next 20 years.
 - GMA requires the state Office of Financial Management to develop population Projections for the state and each county. Each county works with the cities to allocate the projected population growth, which is used in comprehensive planning processes to accommodate projected growth.
 - Counties are now required to include federally recognized tribes in local planning processes through memorandums of agreement.
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Countywide Planning Policies

Countywide planning policies must address policies for:

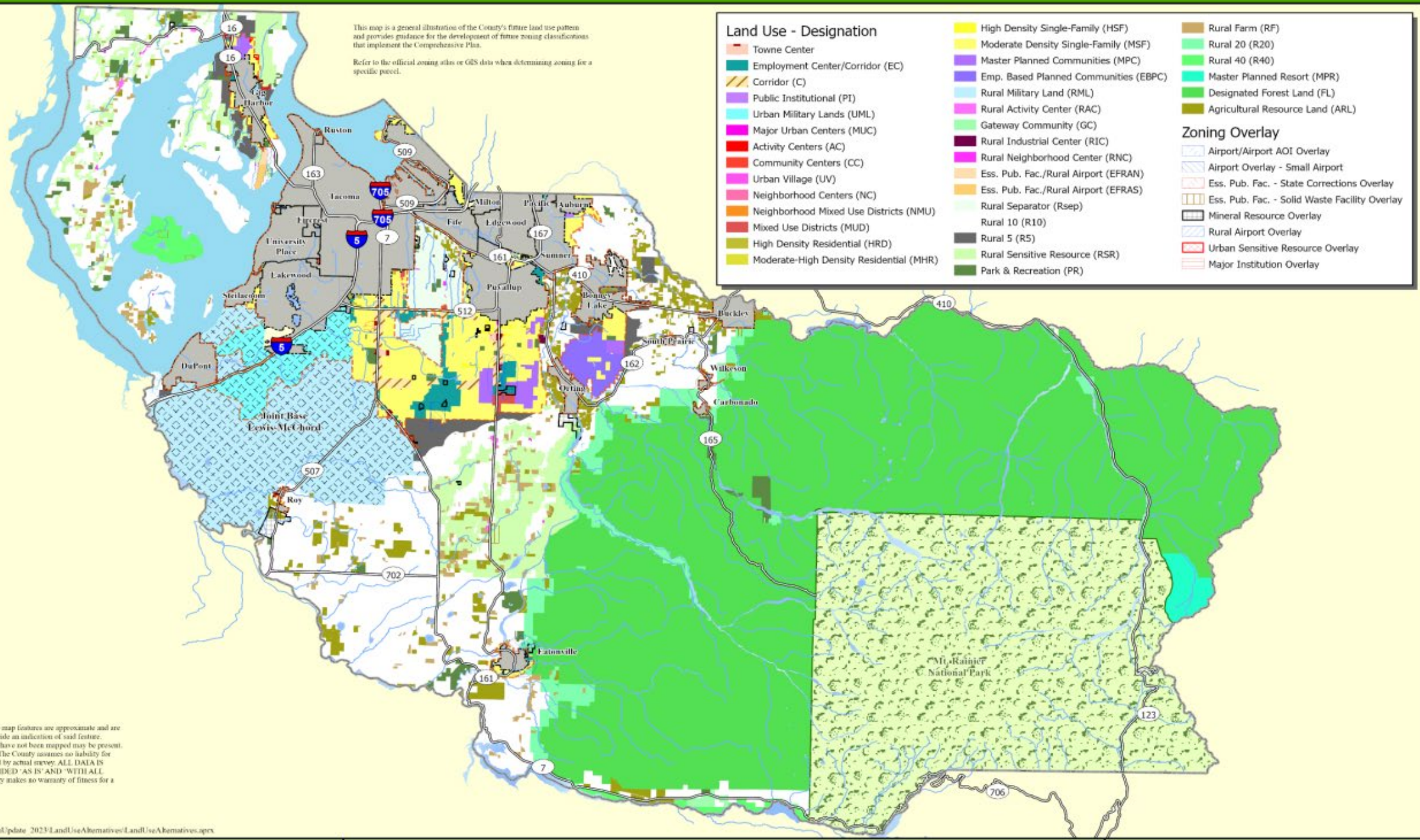
- Designating urban growth areas
- Promotion of contiguous and orderly development and provision of urban services to such development
- Joint county and city planning within urban growth areas



Countywide Planning Policies, cont.

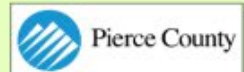
Countywide planning policies must address policies for:

- Siting public capital facilities of a countywide or statewide nature
- **NEW!** Considering the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution
- Countywide economic development and employment
- Must address all of these at a minimum, can include more....



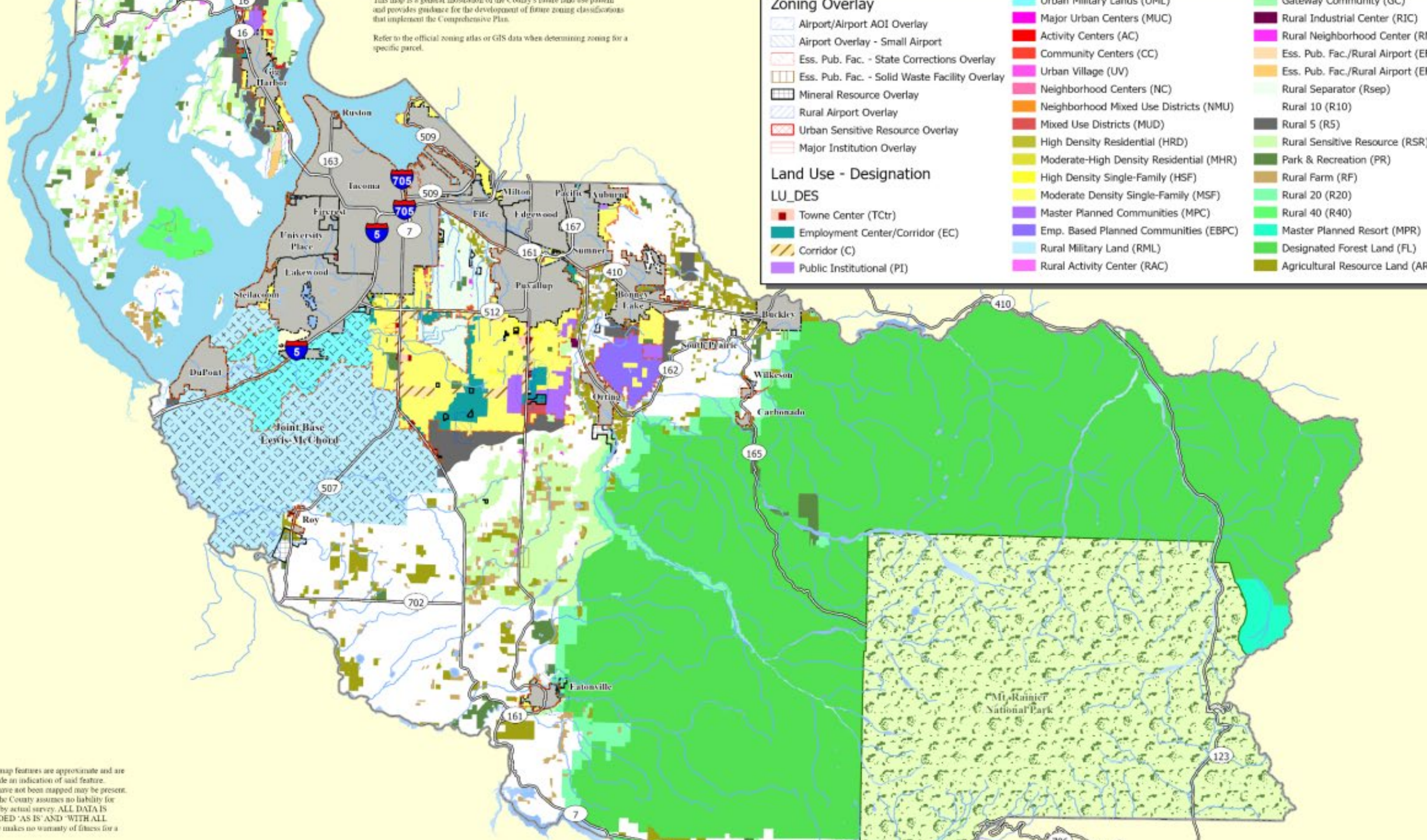
Map Disclaimer: The map features are approximate and are intended only to provide an indication of said feature. Additional areas that have not been mapped may be present. This is not a survey. The County assumes no liability for variations ascertained by actual survey. ALL DATA IS EXPRESSLY PROVIDED "AS IS" AND "WITH ALL FAULTS." The County makes no warranty of fitness for a particular purpose.

- County Boundary
- Urban Growth Boundaries
- Municipal Area
- Nisqually NWR
- Mount Rainier NP
- Military Land

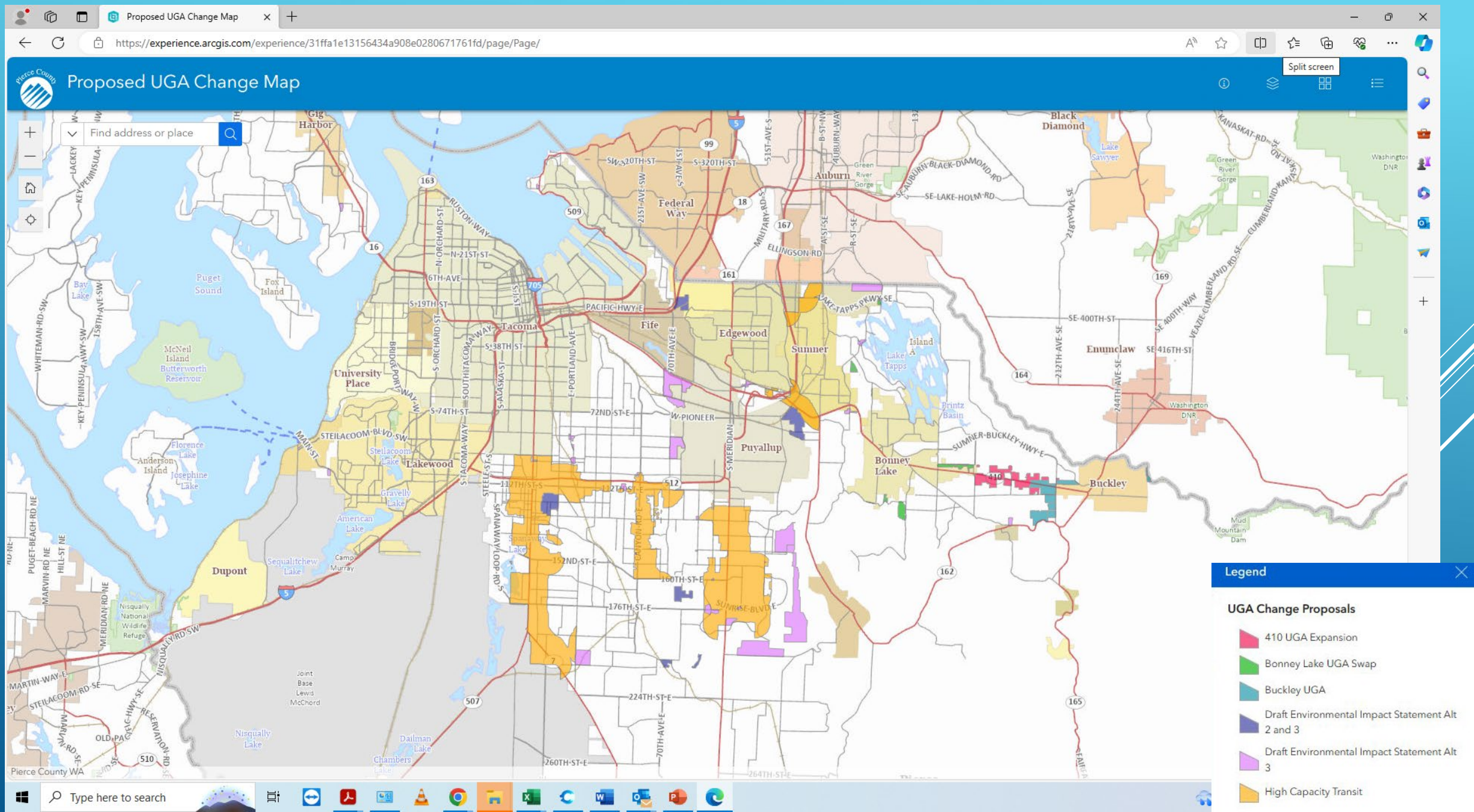


Map 2-1: Land Use Designations Map EIS Alternative #2

Revision Date: 7/3/2023
 Plot Date: 7/7/2023
 Miles



Proposed UGA Change Map (arcgis.com)

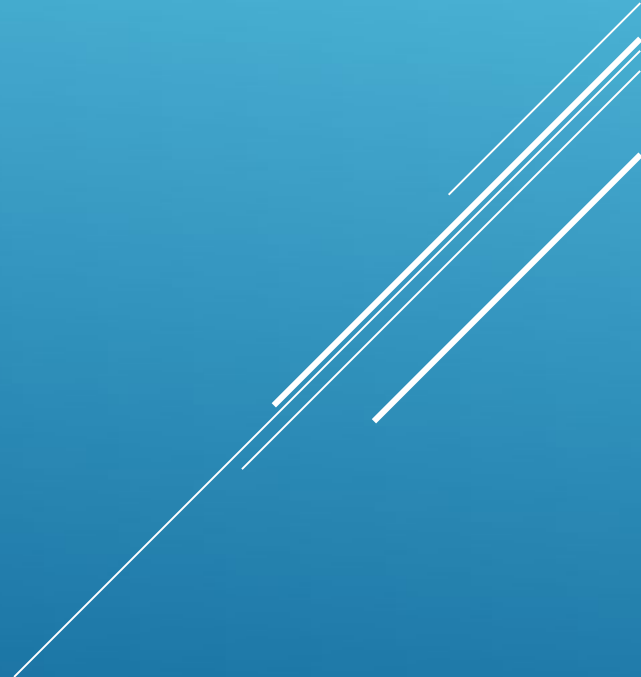


Pierce County Comprehensive Plan Alternatives

Area or Issue	Alternative 2	Alternative 3
Overall Approach	Increase density throughout the urban area, including the HCT, to support housing affordability and access to transit.	Increase density to create a high-density, walkable core of development in the HCT, but reduce capacity outside the HCT.
Urban Growth Area (UGA)	Keep the current UGA.	Retract the UGA in areas not characterized by urban growth to remove about 2,500 acres and reduce capacity by 17%.
High-Capacity Transit (HCT) Unincorporated Pierce County	Keep the boundaries of the Centers and Corridors area the same.	Expand the Centers and Corridors boundaries to the area ½ mile from the transit corridor.
Urban Unincorporated Areas Pierce County outside HCT	Allow 10 units per acre in the moderate density residential areas. Allow 25 units per acre in high density residential areas.	Keep residential density the same. Do not allow residential development in commercial areas outside the HCT.
Rural and Resource Areas	Keep rural density bonuses (this still maintains a maximum of one unit per five acres).	Eliminate rural density bonuses to slow growth in rural and resource areas.
SEPA Infill Exemption Reduce environmental review requirements in urban area where growth is expected.	Allow for infill development in the whole urban area to be exempt from environmental review.	Allow for infill development to be exempt from environmental review in the HCT area only.
Density Calculations Net density now used in urban area to limit development near critical areas.	Allow gross density calculations in the urban area.	Keep net density calculations in the urban area.
Urban Sensitive Overlay Put in place in some areas prior to adopted critical area regulations and updated stormwater regulations.	Remove the urban sensitive overlay.	Keep the urban sensitive overlay.

Resources To Make Your Task Easier

- Summaries of Comp Plan Chapters
- An example follows



Summaries Of Draft Plan Elements Available Online – Example - Housing

Planning Options

Alternative 1 does not change existing land use policies or zoning. It results in a deficit of housing capacity for households with low incomes in the 0-80% AMI range.

Alternative 2 would increase density to 8 units per acre in most parts of the urban area to support middle housing production. This would result in more intense development, but still suburban in character. Alternative 2 would provide adequate housing capacity for all incomes.

Alternative 3 would increase density to 20 units per acre in most areas within 1/2 mile of the County's established Centers and Corridors to support transit-oriented development. Areas outside the expanded Centers and Corridors areas would stay much the same. Alternative 3 results in a deficit of housing capacity for households with low incomes in the 0-80% AMI range.

Summaries Of Draft Plan Elements Available Online – Example – Housing, cont'd

Data and Issues to be Addressed

Housing Units. According to the Washington State Department of Commerce there were 355,799 housing units in Pierce County in 2020, with 57% in incorporated cities and towns and 43% in unincorporated areas.

Ages. The proportion of older adults (age 65 and older) is expected to grow to about 23%, with a similar decline in children under 18. Currently Pierce County's rural areas have higher percentages of older residents, while our urban unincorporated areas tend to have higher percentages of children. Aging signals that the need for smaller, more affordable units will be strong.

Household Size. More than 50% of the households have only one or two people. However, the share of larger households has grown in urban areas outside of the urban growth area.

Summaries Of Draft Plan Elements Available Online – Example – Housing, cont'd

Data and Issues to be Addressed (cont'd)

Disabilities. About 12% of the population has a disability in unincorporated Pierce County. Disabilities can include sensory disabilities, physical disabilities, mental disabilities, self-care disabilities, gooutside home disabilities, and employment disabilities. These conditions often require accommodations that can leave people with disabilities at risk of discrimination and harassment in their attempts to secure and maintain housing.

Cost-Burden. 36% of the population is cost-burdened, which means they pay more than 30% of their income for housing.

Housing Type Diversity. Diversify housing types. To meet the needs of all residents, housing is needed that fits each stage of life in terms of size, design, and affordability for the diverse people in our community. Middle housing consists of housing types that provide alternatives to both detached single-family units and large multi-family flats. This includes duplexes, cottages, row homes, and ADUs. These diversify the types of available and provide options for community members.

Summaries Of Draft Plan Elements Available Online – Example – Housing, cont'd

Data and Issues to be Addressed (cont'd)

There are similar sections for these issues:

- Housing for special needs
- Homelessness
- Growth Areas
- Transportation
- Climate Change
- Housing Types
- Affordability
- Shelter
- Traditional Housing
- Growth
- Racial and other disparate impacts
- Housing Equity Strategies
- Home Ownership

Summaries Of Draft Plan Elements Available Online – Example – Housing, cont'd

Proposed Policies

- Housing for All
 - Affordable Housing
 - Existing Housing Stock
 - Farmworker Housing
 - Housing & Growth
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WRITTEN COMMENTS AND TESTIMONY



SAMPLE LETTER – Information for commenting

Requirements for counties

- Planning for and accommodating 20-year projections for permanent housing needs by income level
- Accessory dwelling units (ADUs) – within urban growth areas, two ADUs must be allowed on all lots in zoning districts that allow single-family homes (Deadline for compliance is June 2025, but can address it now in the update)

Policy options for counties

- Middle housing – allow multiple dwelling units per lot that are compatible in scale, form, and character with single-family homes
- Incentives for affordable housing – Multi-family Tax Exemption, density bonuses, expedited permitting, etc.

SAMPLE LETTER

The **sample letter that follows** can be used to write letters to the jurisdiction's 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. Put it in your own words and make it your own!**

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 draft sample letter** provides a suggested format for submitting comments in two sections:

- What you like about Alternatives 2 and 3
- What you don't like or think should be changed about Alternatives 2 and 3, or mitigation measures

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

SAMPLE LETTER - Introduction

TO PLANNING STAFF

(Can be emailed to CompPlanUpdate@PierceCountyWa.gov)

By 4:30 p.m. February 26

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.

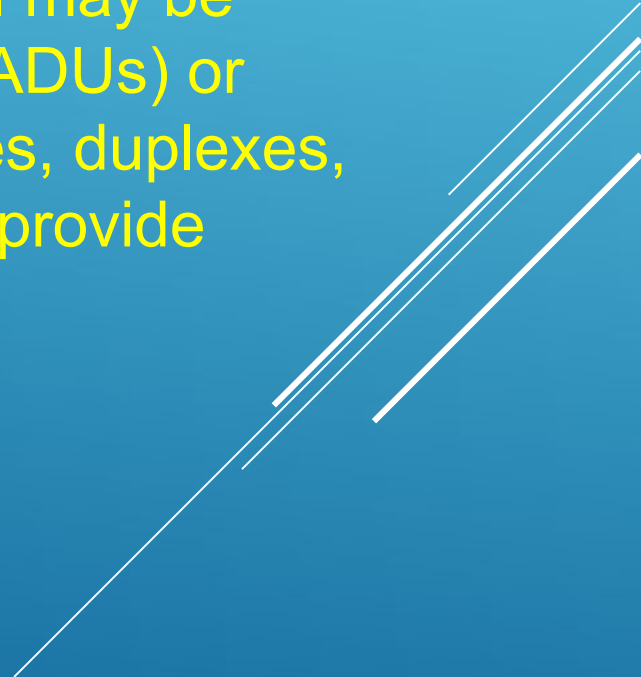
SAMPLE LETTER, cont'd – Why You're Writing

An increasing gap between wages and housing costs has contributed to a crisis in housing affordability. And the things we all love about this county have attracted a growing population, increasing the demand for and cost of housing.

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. To meet the current shortage and next 20 years of growth, 32,048 additional homes are needed in the County. Pierce County is required to plan for 20,024 more homes for 0-80% median income.

SAMPLE LETTER, cont'd – Defining the Problem

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.

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SAMPLE LETTER, cont'd – What You Want

I support:

- **Planning for higher densities and inclusionary housing** 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.
- **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.
- **Higher density housing development** 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.

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Urban Sensitive Overlay Put in place in some areas prior to adopted critical area regulations and updated stormwater regulations.	Remove the urban sensitive overlay.	Keep the urban sensitive overlay.

SAMPLE LETTER, cont'd

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 to increase the capacity for housing.
- Removes the urban sensitive overlay now that the County has a critical areas ordinance. Removing the overlay can streamline the process for housing development.

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.

SAMPLE LETTER, cont'd

What I support in the proposed plan:

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.

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SAMPLE LETTER, cont'd

What needs to be changed in the plan [This would include parts of the plan that do not comply with GMA requirements]:

Land Use Element:

- Provide better maps that clearly indicate land use designations. The current maps are very hard to read. For example, the map shows the same color yellow for Moderate and High Density Single Family Residential.
- The plan talks about planning for transit centers. If transit centers are currently planned and designated in the UUGA, designate them on the maps.

Housing Element:

- The plan should be revised to allow all of the types of housing as required for cities by new GMA legislation in the HCTs.
- The County should consider requiring that multifamily housing tax incentives be limited to low-income housing.

SAMPLE LETTER, cont'd – Closing

Thank you for your consideration.

Respectfully,

/s/

Jane Denver
1234 Morning Lane
Tacoma, WA

Planning for Housing Resources – State of WA

We Need More Housing in Washington State, WA State Department of Commerce

<https://deptofcommerce.app.box.com/s/r5h7q41n8bsm3gmbzlvbqqjhs1w3xv0y> and Fact Sheet

<https://lwvtpc.org/docs.ashx?id=1288585>

Ending Chronic Homelessness Saves Taxpayers Money, National Alliance to End Homelessness,

<https://endhomelessness.org/wp-content/uploads/2017/06/Cost-Savings-from-PSH.pdf>

WA State Department of Commerce Videos, Fact Sheets and Powerpoints on following topics:

<https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/>

- We Need More Housing
- Housing Washingtonians
- Planning for the Homeless and Lowest Income Bracket
- Middle Housing & Accessory Dwellings in Washington State
- Racially Disparate Impacts
- Quality of Life and Environment

Information Resources – Pierce County

➤ Pierce County Comprehensive Plan Update

Webpage:

- Includes draft plan elements
- Draft Environmental Impact Statement
- Upcoming meetings
- A mapping tool in ARC Gis to see land use changes in more detail (not very useful)

➤ Pierce County Planning Commission meetings –

Webpage has Agenda Packets with staff reports and videos of staff presentations on plan elements:

- January 9 meeting covered Climate Change and Environment
- Jan 23 meeting – covered Land Use, Housing, Community Design and Economic Development

Information Resources – League of Women Voters

LWVTPC position on Affordable Housing and Shelter states:

- The increasing gap between wages and housing costs has contributed to a crisis in housing affordability
- Tools for addressing housing and temporary shelter include zoning and regulatory updates.
- Incentives, such as density bonuses, expedited permitting, and reduced zoning, should be reserved for housing that increases housing stability for low-income households and reduces homelessness for all.
- Urban sprawl, pollution, and traffic congestion can be reduced by allowing missing middle housing, infill housing (tiny houses, ADUs, and DADUs, single room occupancy (SRO) units, shared housing, and creative low-cost pilot projects.

Information Resources – League of Women Voters

LWVTPC has a position on Transportation that states:

- Many forms of personal mobility should be equitably available and compatible with attractive, livable, accessible and affordable communities.
- Travel alternatives such as bikeways and walkways to work, shopping, and transit stations should be available.
- The county and cities should coordinate transportation planning to make certain that all modes of transportation from buses (public and private), rail, ferries, park and ride lots, pedestrian facilities, and bicycles are planned to work together in an integrated system.

Offer of Assistance and Review

If you have questions or need help in drafting the letter, contact:

Cynthia Stewart at stewdahl@comcast.net

or

Heather Ballash at marcusroening@harboret.com

If you would like someone to review your letter:

Contact Heather Ballash at marcusroening@harboret.com

 **Please send Heather your draft letter for review by Friday, February 23, to receive feedback before the comment deadline.**

Comments are due by 4:30 p.m. on February 26.