



February 26, 2024

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

Emailed to: [compplanupdate@PierceCountyWa.gov](mailto:compplanupdate@PierceCountyWa.gov)

Dear Long Range Planning Staff:

Thank you for the opportunity to comment on the County's draft comprehensive plan update. The League of Women Voters of Tacoma-Pierce County (LWVTPC) especially appreciates the work that Pierce County has done in this update to create more housing opportunities and to address issues of housing affordability.

LWVTPC is a nonpartisan political organization that encourages informed and active participation in government, works to increase understanding of major public policy issues and, after member study and agreement, works to influence public policy through education and advocacy.

As you know, an increasing gap between wages and housing costs has contributed to a crisis in housing affordability in Washington State. And as the draft Housing Element notes, this is also true in unincorporated Pierce County. Median family income increased 59%, while rents and home values increased by 79% and 103%, respectively, between 2015 and 2021. To meet the current shortage and next 20 years of growth, we understand that the Growth Management Act (GMA) now requires the County to plan for and accommodate housing for households in every income bracket, including zoning and land capacity and provide for shelters for unhoused individuals.

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. 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.

The LWVTPC supports planning for higher densities, including middle housing, near transit in the County's unincorporated urban growth area (UUGA) 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 to be income-restricted.

The LWVTPC supports inclusive development to reduce the negative effects of gentrification and the disproportionate impacts of gentrification on communities of color. Methods we also support include but are not limited to community benefits agreements, land value capture, and removal of land speculation incentives.

We also support higher density development in the Unincorporated UGA 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 services near transit increases the walkability and livability of neighborhoods.

### 1. What the LWVTPC supports in the draft plan update:

- Land Use Element:
  - DEIS Alternative 2
    - The increased density in the High Capacity Transit areas (HCTs) of the unincorporated urban growth area (UUGA), should better support housing affordability and access to transit.
    - Allowing gross density calculations in the urban area would allow landowners to develop their land at higher densities while protecting critical areas.
    - Removing the urban sensitive overlay in the designated HCTs makes sense now that the County has a critical areas ordinance. But it may not make sense for the entire unincorporated urban growth area (UUGA), especially in areas designated for lower density.
  - DEIS Alternative 3
    - Increasing the density to create high-density, walkable cores of development in the HCTs, with reduced capacity outside the HCTs makes sense, as long as it results in sufficient densities to accommodate the County's planning projections for new housing needed by 2044.
    - Retracting the UUGA in areas not characterized by urban growth reduces the cost of providing capital facilities, vehicle miles traveled, and emissions.
    - The elimination of rural density bonuses will help to slow growth in rural and resource areas, and to redirect that growth into urban areas with services and capital facilities.
    - Allowing for infill development to be exempt from review under the State Environmental Policy Act (SEPA) only in the HCT areas should streamline the permit process, thereby reducing the cost of construction for housing in those areas. Critical areas should still be protected by the critical areas regulations.
    - LU-10.1.4 – Designating Centers and Corridors within or near a half mile of major transportation corridors, with support for development of pedestrian and bicycle connections, pedestrian oriented land uses, and amenities, encourages transit use per the Federal Highway Administration.
  - DEIS Alternatives 2 and 3

- Downzoning areas in the UUGA consistent with the Flood Hazard Management Plan to Residential Resource will mitigate flood impacts.
  - LU-10.1.2 - Ensuring density and intensity in Centers and Corridors through mixed-use and commercial development near high-capacity transit reduces single occupancy vehicle use.
  - LU-11.4 – Expanding the Multi-Family Tax Exemption within HCT areas can help to support transit.
  - LU-17.4 – Allowing for two ADUs on a residential lot where a single-family dwelling exists will provide more affordable housing opportunities for low-income households.
- Housing Element:
  - The LWVTPC especially supports financial incentives for affordable housing construction, County support for mobile and manufactured homes, and promotion of density near high-capacity transit. Increased density near transit reduces vehicle emissions, provides better access to transportation, and helps to create walkable communities. LWVTPC recommends that these strategies listed on page 22 of the draft Housing Element be considered for adoption as policies in the updated plan.
  - Policy H-1.1 allows middle housing such duplexes, townhomes, accessory dwelling units (ADUs), cottages, multi-plexes, and other innovative types of housing in the UUGA will help to increase the supply of affordable housing for low-income families.
  - Policy H-1.4 provides incentives such as bonus density, increased building height, multifamily housing tax incentives, reduced parking requirements, and other measures that should encourage the development of multifamily housing.
  - Policy H-1.6 expands the options for shared housing in urban zones to support affordability for very low and extremely low income households.
  - Goal H-2 encourages the development of new housing in the UUGA by streamlining ADU development. It also requires planning for housing density and affordable housing near existing or future transit routes with high frequency service.
  - Goal H-5 and implementing policies provide support for preventing discrimination, addressing displacement, and mitigating past harm in the development and maintenance housing.

- Goal H-7 and implementing policies that promote innovative programs such as community land trusts, bonus density for affordable housing units in urban areas, and other programs provide tools for the County to reduce the cost of home ownership.
- Goal H-8 allows mobile home parks in areas where other single-family housing is allowed. Mobile homes provide an unsubsidized form of low-income housing.
- H-13.2 ensures adequate zoning to support emergency and temporary housing for homeless as well as transitional and permanent supportive housing for formerly unhoused families.
- Transportation Element:
  - T-3A.1.2 supports better access by residents to employment centers and regional transit hubs.
  - Alternative 3 new TA-3A.3.1 requires the County to address forecasted amenity deficits at frequent transit stops. Amenities such as sidewalks and bike paths that connect people to transit provides better access for riders and contributes to walkable communities. We also support new TA-3A.3.2 to increase access for underinvested communities.

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

- Land Use Element:
  - The proposed land use maps on pages 19-21 for the EIS alternatives are very hard to read. It is impossible to tell what densities are proposed and where because there is no definition of density for each type of residential use. And the map colors for High Density Single Family and Moderate Density Single Family are indistinguishable as the same shade of yellow is used for both. Further, the maps do not indicate where the HCTs are located in relation to the proposed land use designations and densities. All of this information should be included in the draft plan. We recommend that the preferred alternative that is developed have much more detail regarding different types of land uses and corresponding densities, with a much clearer map of the land use designations. For example, the plan states that density should be increased in the HCTs, but it does not specifically say what density is proposed in these areas.
  - The plan says the County will prioritize more intense land use according to Centers and Corridors to support frequent transit stops but does not provide any information on where those frequent transit stops are located or planned. This is a key component of the draft update that should be included in the Land Use or Transportation Element.
  - LWVTPC would support a hybrid DEIS preferred alternative that provides for more units per acre within the HCT, with even higher densities allowed near transit stops. The plan may also need to provide for higher densities in some areas outside the HCTs to create sufficient capacity to meet or exceed the projected affordable housing needs in the County's housing allocation.

- Regarding Goal LU-29 – Policy 29.4, we encourage the County to consider allowing developers of high-density residential development to construct additional units in even higher density clusters in exchange for creating more open space on the development site. This would provide the opportunity to retain tree canopy to mitigate the impacts of higher density and sequester carbon, as well as provide open space for residents to enjoy.
- Consistent with COP 15 and best scientific knowledge, LWVTPC urges that Pierce County and associated jurisdictions should conserve and manage a total of at least 30 percent of land and waterways for native biodiversity by 2030. This could go into both the Environment section and Land Use section of the plan.
- Housing Element:
  - The plan should be revised to allow all of the types of housing in the HCTs, as now required for cities under recent legislation.
  - Goal H-4 expands the Multi-Family Tax Exemption Program to encourage the development of more affordable multi-family housing. The LWVTPC supports the use multi-family housing tax incentives, but recommends they be limited to low-income housing developments.
- Transportation Element:
  - The plan only provides a reference to VISION 2050 for a definition of High-Capacity Transit (HCT) areas. Given the plan's focus on development in HCTs, the plan should clearly state in both the Land Use and Transportation elements that they are "Areas within ½ a mile of existing or planned light rail and streetcar stations, commuter rail stations, ferry terminals, and within ¼ mile of all bus rapid transit stations." The public should not be expected to go find VISION 2050 and look up the definition.
  - The draft Transportation Element provides a description and map of the transit priority network buildout on pages 88 and 89 but does not show where transit centers are or would be located as previously noted. The plan should reference, at a minimum, existing and planned transit centers in the Pierce Transit 2040 plan – existing Parkland and South Hill Mall transit centers, and the planned transit center in Spanaway that is under construction. The plan should also indicate what criteria the County and transit agencies are or will be using to designate future transit centers.
- Public Participation Plan:
  - We appreciate the opportunity to comment on the draft update to the comprehensive plan. We recognize that this is a major undertaking with many moving parts. However, in order for citizens to participate in the planning process, the public participation plan should be very clear and transparent. Information on how and when to participate in this update has been piecemeal and hard to find. It would be helpful, for example, to have a graph that shows all of the opportunities for public comments – written comments to the planning commission with deadline, scheduled planning commission hearings, and scheduled written comment deadline and hearings before the County

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Council. We hope that the update process and opportunities for public participation become more clearly communicated in time for the public to fully engage in a complicated process.

Thank you for your consideration.

Respectfully,

A handwritten signature in blue ink that reads "Rosemary Powers". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rosemary Powers, President