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December 3, 2024

Pierce County Council
930 Tacoma Ave S
Tacoma, WA 98402

Dear Pierce County Council,

On behalf of the Master Builders Association of Pierce County (MBAPC) Legislative Strategy Committee, I want to thank you for the opportunity to comment on the Comprehensive Plan and all related documents and policies. We note that many direct questions asked by the MBAPC in the Draft EIS were not answered in the Final EIS most importantly is details on how the High-Capacity Transit will be funded and how a delay in service impacts the densities allocated to these areas.

This letter serves as a follow-up to our earlier correspondence, again outlining major concerns from the building community. While we are grateful for the Planning and Public Works Department public outreach over and engagement in the last two years, it is concerning how the Council has drastically changed many of the policy directives in just the last two weeks without substantial and meaningful outreach to the community and interested stakeholders.

The greatest concern in O2024-559s2 is the elimination of maximum rural density as this decision is directly opposed to the county's own goal of creating attainable housing. Reinstating this policy will support density incentives, offer flexibility for development, and preserve open space in rural areas.

Removal of properties from the UGA, yet again presents more barriers to expanding housing options in Pierce County. Removing these large sections of buildable land from the UGA is effectively a down zone and will not help the county meet its targets. Not only does this restrict the rights of landowners who have been planning for their property under these assumptions, but it also ties the hands of cities and towns planning for their own growth.

Concerning the Critical Areas Development Regulations, there remain serious issues with limitations presented in O2024-553s2. The proposed increases in wetland buffer widths, stricter regulations on single-family homes in wetland areas, and the application of a Type O stream which is not included in the DNR Stream Typing Classification System could lead to significant limitations on land use. Mitigation sequencing should not apply to hazard areas, as the solution

to these areas is through engineered solutions not avoidance and minimization. Collectively these measures, though well-intentioned, effectively take private property away from owners and again limit the ability to create more housing in areas where people want to live.

Ultimately, the MBAPC cannot support policy that does not encourage the creation of attainable housing. As the region continues to grapple with increasing housing costs, the direction the council is taking limits housing options and will only exacerbate the shortage. We remain committed to bringing attainable housing to the residents of Pierce County and will utilize all options to challenge any policies and directives counter to this. We implore the council to reconsider the impact that these policies will have on housing supply and attainability across the county.

Sincerely,



Cheryl Ebsworth
Legislative Strategy Committee Chair
Master Builders Association of Pierce County