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With over 800 members, **Master Builders Association of Pierce County (MBAPC)** is the leading homebuilders' association serving Pierce County's residential construction industry. For decades, we have dedicated ourselves to serving as the most trusted and respected housing experts in the region.

MBAPC appreciates the opportunity to provide comments O2025-516s and the drafted amendments, as well as feedback on where improvements can be made. While there are areas throughout the Comprehensive Plan and the associated changes that move Pierce County in the right direction, there are unfortunately too many instances where this legislation falls short.

- In Exhibit D Chapter 18A.95.050 C5: This language should be removed entirely as rezoning involves site specific analysis by County professionals and this precludes that analysis and prevents rezones that could otherwise be envisioned within the Comprehensive Plan.
- In Exhibit G Chapter 18J.15.185 D: This language should be removed from the code as the middle housing code is untested and must remain as flexible as possible. These design elements with disincentive middle housing. If this section cannot be removed in its entirety, Council Amendment 8 must be adopted to allow builders the flexibility needed to meet the demands of the market.
- In Exhibit D Table 18A.15.040-1 Urban Setbacks: The minimum Interior/Side Setback for Suburban Residential needs to be amended to 5 feet. This gives builders more flexibility and is consistent with the new Middle Housing zone that is set at 5 feet. Council Amendment 6 addresses this concern and should be adopted.
- In Exhibit D Infill Housing: Council Amendment 3 is critical to allowing infill where housing is needed today. It is important that there are options to meet the housing needs of today. By allowing this specific minimum residential density reduction, units can start coming online much sooner.
- In Exhibit D Temporary Housing Community Definition and Duration of Authorization: We remain concerned that the definition of Temporary Housing Community has been amended to remove the word "temporary" all together. Not only should the definition be corrected to reflect a truly temporary community, but the Duration of Authorization found in 18A.38.040 D must be amended to ensure that these sites cannot be sited for an infinite amount of time. We ask that this council approve Council Amendment 7 to cap the duration of these sites to a total of three consecutive years.
- In Exhibit G 18J.15.140 Low Impact Development: A2, "Open space corridors of the Graham and Gig Harbor Community Plan areas" should be removed. Open Space Corridors are not critical areas, this exceeds the Open Space designation code authority, and this application is being applied arbitrarily based on the community plans. This needs to be removed for consistency in regulation and to appropriately utilize the authority of land which was placed in the open space corridor under a different pretense.

- In Exhibit D Table 18A.15.020-1 Urban Residential Density and Urban Lot Dimensions: The Residential Densities for NCOR, UCOR, and TCTR are far from what is available in the industry today. Minimum densities of 24 dwelling units per acre will not meet the demand of today, push middle housing products to the side and make way for more market rate rental units to take the goal of home ownership away from more residents of Pierce County. We ask that the council revise these zones for residential density to the following: NCOR: Minimum 12, Maximum 20; UCOR: Minimum 12, Maximum 20; TCTR: Minimum 20, Maximum 60.

Ultimately, the **MBAPC** cannot support a policy that adds restrictive and costly regulations to attainable housing in Pierce County. We hope in the future the council will consider collaborating with the professionals and experts doing this work when drafting new regulations. The housing crisis demands action, but action that is possible and meets the needs of the community. Unfortunately, if this ordinance is passed without these suggested changes the status quo will continue, and attainable housing will be pushed farther away for Pierce County residents each day.

Sincerely,

Master Builder Association of Pierce County.