



1211 South Pearl St. |
Tacoma, WA 98465 253.272.2112 | www.masterbuilderspierce.com

8/22/25

Tacoma City Planning Commission
747 Market St # 345,
Tacoma, WA 98402

Re: MBAPC Comments on Draft Amendments to TMC 13.11 – Critical Areas

Dear Chair and Commissioners,

With over 800 members, the 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 being the most trusted and respected voice on housing in the region. Today we are writing to summarize some of our concerns regarding the proposed updates to Tacoma's Critical Areas Ordinance. As stakeholders who value both environmental stewardship and housing attainability, we believe this update requires additional refinement to avoid unintended consequences for housing attainability. Below you can find a summary of our concerns. Thank you for your time and consideration.

1. Removal of the Public Interest Legal Test

The proposed removal of the Public Interest test under Section 13.11.240 raises concern. This test has historically provided an important legal basis for balancing the community benefits of housing and infrastructure with potential environmental impacts, at the discretion of the Director. Without this option, applicants will have limited flexibility and justification for projects that serve a broader public good. We encourage the City to retain or revise the Public Interest test to ensure that critical area regulations continue to accommodate projects that serve clear community benefits.

2. Buffer Expansion and Increased Wetland Mitigation Ratios

Section 13.11.250 introduces a new requirement that buildings and other structures be set back an additional ten feet from the edge of wetland and stream buffers. This requirement is layered on top of existing buffer widths, further reducing the developable area of a site. For small parcels and infill projects in particular, this additional setback can eliminate otherwise feasible housing opportunities. In addition, the ordinance expands compensatory wetland mitigation ratios, which may add costs and complexity for projects. While we support the goal of ensuring ecological protection, it is important to ensure that mitigation requirements remain proportional and predictable, so they do not unintentionally discourage much needed housing development.

3. Buffer Expansion and Addition of Streams and Wetlands of Local Significance

Sections 13.11.310, 13.11.320, and 13.11.420 add new designations for Streams and Wetlands of Local Significance, along with expanded buffer requirements, specifically for non-fish bearing streams. While we understand the intent to recognize and protect valued local resources, some of these features are located within or pass through already urbanized areas. Applying new buffer standards in these settings may add challenges for redevelopment and infill housing opportunities in Tacoma. We encourage the city to carefully consider how this new designation is applied in urbanized areas and adopt measures that provide appropriate flexibility, ensuring that housing development and local preservation can be achieved together.

4. CARA Changes and Alterations

Sections 13.11.800 and 13.11.810 specify that the Central Pierce County Sole Source Aquifer extends through the City of Tacoma and outlines updated permitted uses. We have concerns about how this expansion and designation could impact the homebuilding industry as well as future development and job growth in Tacoma. We encourage the city to consider mitigation-based approaches rather than broadly prohibiting certain uses so that water conservation goals can be met while still supporting housing, economic development, and long-term community stability.

MBAPC members are committed to responsible development that respects Tacoma's natural resources. At the same time, the city faces significant challenges in providing attainable housing. We encourage the Planning Commission to refine these amendments to balance environmental protections with the need for housing and community growth. Thoughtful approaches, such as proportional mitigation standards and careful application of regulatory areas, can help achieve both resource stewardship and development goals.

Sincerely,

Master Builders Association of Pierce County