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December 3, 2025

Pierce County Planning and Public Works
2401 S. 35th St. Tacoma, WA 98409

Dear Director Diekmann and Deputy Director Flemister,

Thank you for meeting with members of the Master Builders Association of Pierce County (MBAPC) on Monday, November 3, 2025, to discuss the County's upcoming budget considerations and the Urban Infill Design Guidelines under Pierce County Code (PCC) 18J.17.

During the meeting, Deputy Director Lauren Flemister indicated that staff are proposing to remove the table in PCC 18J.17.010(B), shown below, as a solution to inadvertently requiring Urban Infill Design standards for "higher density residential subdivisions" which are identified as all subdivisions with a density of more than 6 dwelling units per acre.

18J.17.010 General Provisions.



A. *Purpose.* The purpose of this Chapter is to further the goals of the Growth Management Act, which require a diversity of housing types and higher densities within the urban growth area by providing flexible design strategies to meet urban densities, increasing housing supply and attainability, supporting creative and compact housing developments, allowing for neighborhood infill, encouraging walkability and community interaction, and enhancing neighborhood character.

B. *Applicability.* Urban Infill Design is a development option for low and moderate density infill subdivisions up to a maximum of 2 acres in size and a required development standard for higher density residential subdivisions as described in the table below. Urban Infill Design standards are not available for low and moderate density subdivisions greater than 2 acres in size.

	Residential Density	
	0-6 du/ac	More than 6 du/ac
Residential subdivisions and plats in the urban growth area.	Optional for subdivisions and plats up to 2 acres in size – at applicant's discretion*	Required for subdivisions and plats of any size.
*Must comply with Chapter 18J.17 PCC in its entirety		

C. *Conflicts.* The standards in this Chapter are in addition to other development regulations. If there are any conflicts between this Chapter and other development regulations, the provisions of this Chapter shall control.

D. *Architectural Elevations/Profiles and Site Plans Required.* Conceptual building elevations/profiles and site plans are required with initial application. Final building elevations and site plans are required prior to recording of final plat to demonstrate compliance with the requirements of this Chapter.

We agree that removal of the table, along with the associated applicability language related to required compliance for “higher density” subdivisions, through a Director’s Interpretation, would resolve current issue. Additionally, we request that the Director’s Interpretation be applied retroactively to be effective with the adoption of Ordinance O2025-516s on June 10, 2025. This date reflects when the County modified zoning densities, thereby altering the functional meaning of “higher density” across various zones. Applying the interpretation retroactively will allow projects to proceed immediately; and would prevent any projects vested between June 10th and the interpretation issuance from being unintentionally subjected to the Urban Infill requirements instead of the regulations as adopted under O2025-0516s

We appreciate the County’s willingness to address this issue collaboratively and look forward to continuing to work together on the existing and recently adopted design standards within Chapter 18J.15 over the coming year. Please let us know if additional clarification or proposed language would be helpful as you move forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Sam Kuo". The signature is fluid and cursive, with the first name "Sam" and last name "Kuo" clearly distinguishable.

Legislative Strategy Committee Chair
Master Builders Association of Pierce County