

PROJECT MEMO



TO: Scott Larson
FROM: Nicole Stickney
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DATE: May 16, 2024
PROJECT NO.: 2230242.30
PROJECT NAME: Orting Comprehensive Plan Update
SUBJECT: Comprehensive Plan Draft Elements (First half)– for Planning Commission Review

As a part of Task 3: Draft Comprehensive Plan Update, the AHBL consultant team has worked to produce draft updates for the first four chapters of the Orting Comprehensive Plan¹, following guidance and requirements from the Growth Management Act, the Department of Commerce, and the Puget Sound Regional Council. Staff has also considered the City's own history, goals, recent developments, and recommendations.

In addition, we are using feedback gained from the various public meetings that have been held to date and feedback from the City's survey that was conducted for this project, to generate suggested changes.

In this memo, we highlight the key changes and improvements, to serve as a staff report for the Planning Commission and other reviewers, and to accompany the comments and edits displayed in the drafts.

INTRODUCTION

- All proposed modifications are shown in "Tracked Changes"
- All graphics are new
- Icons are used to enhance the document's appearance make it more user-friendly

We added a new section called "Purpose and Intent" to the first part of the Introduction, appearing before the sections titled "Structure" and "What is a Comprehensive Plan, which we have edited minimally. We also improved formatting and incorporated a graphic to make the document more user-friendly. Under the section "*Why is a Comprehensive Plan Needed?*" we updated a part detailing GMA goals, which are particularly important for Planning Commission and other reviewers to take note of, to understand some of the legislative changes that are driving changes to the local Plan.

The section "Orting's Setting and Location" is newly written and will include some basic land calculations (forthcoming), together with a map showing the annexation pattern of the city. Another newly written section titled "Is Orting Rural?" is prepared to hopefully bring clarity and as to how the word "rural" is used within the context of the GMA.

- We recommend the Planning Commission carefully review this part and discuss the language at their upcoming meeting, if this is of further interest.

Next, some general changes to the section under "The Orting Vision" is proposed, and we have shown the current text (with strikeouts) and the proposed new text to clearly show the proposed adjustments for this plan update. Likewise, we suggest adjustments of some "vision goals" to update the plan. One proposed change to update "Orting should expand its employment base so that young people can choose to live and work in the community" to instead read as "Over the years, the city has grown its economic base so that young people can choose to live and work in the community." The term "employment base" could mean workers (number of people/ the skills of the people) and swapping that term for "Economic base" imparts a broader meaning (such as more businesses

¹ The current plan (as adopted November 24, 2020) is called the "2020 Comprehensive Plan"



and additional employment opportunities). Next, I always try to remove the word "citizens" where possible as citizenship can be a loaded term.

Under Vision Goals the phrase "preserve important agricultural lands" is proposed to be modified because preservation of agricultural lands generally runs counter to the roles of cities per the GMA; ag lands are supposed to be in Counties (unincorporated lands). We recognize some of the existing Vision goals, such as "Provide a variety of housing choices for new residents" and "reduce reliance on the automobile..." are quite challenging for many communities including Orting. However, these concepts have been listed in previous version(s) of the Comprehensive Plan and should be retained as it aligns with regional and state objectives/ mandates.

- This could be an important part for the Planning Commission members to review.

We have also trimmed language (for example, a section about "Concurrency" and the "Annual Review Amendment" section) where we observed redundancy or noticed that an item was out of place and should not be included in the Introduction ("concurrency" should be shown in the Transportation Element and is not a broad enough topic for the Introduction).

LAND USE

- We eliminated the Land Use Appendix and instead integrated information into the element itself. This can provide a more cohesive discussion and potentially improve the way the goals and policies are presented and understood within the proper context.
- For this document, we only show the "tracked changes" for the Goals and Policies section, because there are so many edits and updates to this item (many of which are just factual changes).
- Later in the process, this draft be further improved with a table or chart showing the various land use designations and describe the amount (and percentage) of land in each category by acreage (pending modifications to the LU map).
- We have updated language throughout the Element to expand on analysis and discussion, and to help with clarity and flow, including some grammar and spelling edits.
- The MUTCN District is eliminated.

The Land Use Element serves as a long-term guide for the physical development of the City and its urban growth area. Together with the Land Use Map, it establishes a policy and spatial framework to accommodate and steer future growth and development, drawing from the City's historical planning, current land use, development trends, circulation patterns, and the community's vision for the future. The Land Use Element integrates and guides other components of the Comprehensive Plan, providing detailed policies on specific areas such as housing, environmental protection, and economic development.

Orting has seen many changes since substantial work was done on this part of the Comprehensive Plan, and so we have attempted to capture those changes. In addition, we have added additional details to fill in the "gaps" between what type of information is required in the plan and what the current plan lists out (for example, it is necessary to describe if the city contains any "urban or community forests" per RCW 36.70A.070 (1) as amended in 2023 and so we have stated this is not the case. We also characterize changes that have occurred in the community over time (such as the extent to which farming has been replaced by development).

- We recommend the Planning Commission members pay particular attention to the city's growth numbers and targets.

The following list captures some key notes that accompany the draft's proposed goals/ policy edits:

- LU1.6: We suggest adjusting the word vision to strategy because the word "vision" doesn't quite fit, and could be confused with the city's vision statement which this policy is not referring to
- Remove former LU 1.9: While there are gardens and some growing activities in Orting this policy should be removed as there are no "agricultural lands" within city limits



- Proposed New LU 1.9: It's important to consider having a statement about the Architectural Design Review included in the Comprehensive Plan to form as a basis for the regulations or requirements for development as implemented by the City.
 - Note: The state legislature passed HB 1293 in 2023 which limits how cities can do these things. Compliance with RCW 36.70A.630: Local design review—Requirements and restrictions. (wa.gov) is required in Orting by June 30, 2025.
- Proposed Goal LU 3 and the first 4 policies are proposed to be added per the PSRC requirements (as included on their checklist). Likewise, Proposed policy LU 3.5 and LU 3.6 are proposed to be added per the Pierce County CPPs.
- Policy LU 4.2, we have included a suggested addition based on public comment and growth projection numbers.
- Policy 8.1, "more intensive private development" might be better described as "vibrant private development," particularly since parking requirements might present a limiting factor.
- Under Goal LU-9, the Planning Commission may wish to particularly review Policy LU 9.1 to contemplate if any rewrites are appropriate at this time (is the concept presented feasible?). As for LU 9.3, we have proposed to trim language that is quite specific and should probably not be in the comprehensive plan (instead the development regulations would address these details).
- Section on "Critical Areas" is relocated to the (new) Natural Environment element.
- Former Goal LU 13 (and related policies) is shown as struck, as it will be relocated to the Capital Facilities Element.
- Section on "Urban Agriculture" is removed. It is no longer relevant, and further "Prime agricultural land" is a "loaded term" with specific meaning under the GMA. In short, this term should not be used as only lands outside cities can be so designated. (Please note that revisions to LU 2.4 are included to capture ways to support local agricultural production.)

NATURAL ENVIRONMENT

In order to meet both the GMA and PSRC requirements and the City's goals, we have written a new Natural Environment Element of the Orting Comprehensive Plan. We recommend that it follow the Land Use Element in the Plan.

The previous plan certainly addressed many aspects and details about the environment in Orting, but it was spread throughout the document and there was not a separate chapter written on the topic; having a separate and stand-alone Natural Environment element will be a meaningful improvement for this update process. This Element has already been written to provide important information in the community about further updates that must be done in Orting for the Comprehensive Plan (development of a Climate element).

The following list captures some key notes regarding the listed (proposed) goals/ policies:

- The section on "Critical Areas" is relocated from the Land Use element, with a minor proposed change shown in "tracked changes."
- Proposed policy NE 2.1 is from LU 11.7; NE 2.3 is from LU 11.8 and NE 2.4 is from LU 11.9
- Proposed policy NE 3.1 is added to support "environmental justice" values and objectives.
- Proposed Goal NE 4 and the supporting policies are added to support the city's future mandated work to establish a Climate element.
- Proposed Goal NE 5 and supporting policies are added to fulfill new requirements of the GMA (RCW 36.70A.070(2) as amended in 2023.
- For Shoreline - The SMP can be incorporated by reference (the SMP is automatically known as the city's Shoreline Element of the Comprehensive Plan)
- Proposed Goal NE 6 and the supporting policies are added to fit with the discussion on hazards and emergencies as discussed in the element.



- The Planning Commission members may want to learn more about or discuss future requirements for Climate planning, the Wildland Urban Interface (WUI) and other related topics. We are happy to support this inquiry and will be ready to respond to questions as best as we can.

HOUSING ELEMENT

The GMA requirements that set out what must be included in a Housing Element have dramatically changed since the city last performed a periodic update to its plan. Looking back to 2017, RCW 36.70A.070(2) then stated:

A housing element ensuring the vitality and character of established residential neighborhoods that:

(a) Includes an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth;

(b) includes a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including single-family residences;

(c) identifies sufficient land for housing, including, but not limited to, government-assisted housing, housing for low-income families, manufactured housing, multifamily housing, and group homes and foster care facilities; and

(d) makes adequate provisions for existing and projected needs of all economic segments of the community.

RCW 36.70A.070(2) now specifies:

A housing element ensuring the vitality and character of established residential neighborhoods that:

(a) Includes an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth, as provided by the department of commerce, including:

(i) Units for moderate, low, very low, and extremely low-income households; and

(ii) Emergency housing, emergency shelters, and permanent supportive housing;

(b) Includes a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including single-family residences, and within an urban growth area boundary, moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes;

(c) Identifies sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes;

(d) Makes adequate provisions for existing and projected needs of all economic segments of the community, including:

(i) Incorporating consideration for low, very low, extremely low, and moderate-income households;

(ii) Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations;



- (iii) Consideration of housing locations in relation to employment location; and*
 - (iv) Consideration of the role of accessory dwelling units in meeting housing needs;*
 - (e) Identifies local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:*
 - (i) Zoning that may have a discriminatory effect;*
 - (ii) Disinvestment; and*
 - (iii) Infrastructure availability;*
 - (f) Identifies and implements policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions;*
 - (g) Identifies areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments; and*
 - (h) Establishes antidisplacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.*
- In counties and cities subject to the review and evaluation requirements of RCW 36.70A.215, any revision to the housing element shall include consideration of prior review and evaluation reports and any reasonable measures identified. The housing element should link jurisdictional goals with overall county goals to ensure that the housing element goals are met.*
- The adoption of ordinances, development regulations and amendments to such regulations, and other nonproject actions taken by a city that is required or chooses to plan under RCW 36.70A.040 that increase housing capacity, increase housing affordability, and mitigate displacement as required under this subsection (2) and that apply outside of critical areas are not subject to administrative or judicial appeal under chapter 43.21C RCW unless the adoption of such ordinances, development regulations and amendments to such regulations, or other nonproject actions has a probable significant adverse impact on fish habitat.*

The Puget Sound Regional Council's VISION 2050 plan and the Pierce County Countywide Planning Policies also contain robust and specific requirements for city's to plan for housing, which we have also studied and worked to address. In particular the following County-wide Planning Policies have been identified and form the basis for many of the proposed changes:

AH 2.1	AH5.1	AH-7
AH-3	AH5.2	AH-8
AH-4	AH-6	

Please see "comments" on this draft for further detail. We are also attaching the "Affordable Housing" portion of the Countywide Planning Policies for reference, if desired.

NS/ns

c: Wayne Carlson,
Anisa Thaci - AHBL

Affordable Housing

Introduction

Housing determines health. Whether one has accessible, affordable, safe, healthy, and stable housing affects one's ability to attain full health potential. Those with fair and equitable access to attainable and stable housing experience less stress and better mental well-being. Conversely, individuals and families experiencing homelessness are constantly exposed to high health and safety risks.

Housing location has a direct link to access to opportunities. Co-locating affordable and attainable housing with living wage jobs, schools, parks, and other amenities can reduce cost burdens for every household, improve our economy, enrich social life, support health, and improve quality of life. Healthy and adequate housing meets basic human needs and minimizes threats to health and safety, such as allergens and other hazards. Resilient housing located away from potential hazards can lessen the stresses of the changing climate, increase household and community resiliency, and prevent negative health impacts.

Background - Growth Management Act

The Washington State Growth Management Act mandates that counties and cities encourage the availability of affordable housing to all economic segments of the population, promote a variety of residential densities and housing types, and encourage preservation of the existing housing stock. [RCW 36.70A.020(4)]. The term "affordable housing" is defined in RCW 36.70A.030(2) as follows:

Resource:

This [Housing and Health Logic Model](#) provides a menu of evidence-based policies and strategies to improve health, well-being and quality of life.

- (2) "Affordable housing" means, unless the context clearly indicates otherwise, residential housing whose monthly costs, including utilities other than telephone, do not exceed thirty percent of the monthly income of a household whose income is:
 - (a) For rental housing, sixty percent of the median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development; or
 - (b) For owner-occupied housing, eighty percent of the median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development.

The Washington State Growth Management Act requires the adoption of countywide planning policies establish a consistent county-wide framework from which county and city comprehensive plans are developed and adopted. RCW 36.70A.210 requires each county to adopt policies for housing which, .3, at a minimum, "consider the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution" [RCW 36.70A.210(3)(e)].

A countywide housing planning policy shall at a minimum, address the following:

"Policies that consider the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution;"

The Washington State Growth Management Act also identifies mandatory and optional plan elements. [RCW 36.70A.070 and .080]. A Housing Element is a mandatory plan element that must at a minimum comply with 2021 E2SHB 1220.

Since the comprehensive plan of every city and county must be an internally consistent document [RCW 36.70A.070] and all plan elements must be consistent with the future land use map prepared as part of the required land use element [RCW 36.70A.070], these other plan elements will, to a great extent, dictate what will be in the housing element.

Thus, the land use element, relying upon estimates of future population, growth, average numbers of persons per household, and land use densities, and assumptions about what type of housing each economic segment will need will indicate how much (and where) land needs to be made available to accommodate the identified housing needs. The capital facilities, transportation and utilities elements then provide choices about when and how public facilities will be provided to accommodate the projected housing, by type, density and location and other factors such as equitable distribution of public investments.

Background - VISION 2050

The Multicounty Planning Policies (MPPs), named VISION 2050 and produced by the Puget Sound Regional Council (PSRC), include policies and actions as well as the Regional Growth Strategy, which promotes a focused regional growth pattern and serves as a guide for counties and cities as they set local growth targets through their countywide processes to implement the strategy. PSRC and local jurisdictions are expected to address these actions through their planning and work programs.

Policies

AH-1 Explore and identify opportunities to reutilize and redevelop existing parcels where rehabilitation of the buildings is not cost-effective, provided the same is consistent with the countywide policy on historic, archaeological, and cultural preservation and with Policy AH-8 regarding displacement.

AH-2 Plan to meet their affordable and moderate-income housing needs goal by utilizing a range of strategies that may include a Housing Action Plan and will result in the preservation of existing housing, and the production of new, affordable and moderate-income housing that is safe and healthy. Jurisdictions should consider the availability and proximity of public transportation, governmental and commercial services necessary to support residents' needs, and prioritize density and investment in these areas.

Washington State is consistently considering new legislation related to affordable housing and mandates on City's regulatory authority. Jurisdictions are expected to adhere to this legislation regardless of the CPPs. The CPPs should be updated if mandated by State legislation.

2.1 Jurisdictions should consider adopting reasonable measures and innovative techniques (e.g., moderate density housing, clustering, accessory dwelling units, cottage housing, small lots, planned urban developments, and mixed use) to stimulate new higher- density affordable and moderate-income housing stock on residentially zoned vacant and underutilized parcels.

AH-3 Determine the extent of the need for housing affordable for all economic segments of the population, with special attention paid to the historically underserved, both existing and projected for its jurisdiction over the planning period, and shall encourage the availability of housing affordable to all economic segments of the population for each jurisdiction.

3.1 Affordable housing needs not typically met by the private housing market should be addressed through more coordinated countywide and regional approaches/strategies.

3.2 Each jurisdiction may adopt plans and policies for meeting its affordable and moderate income housing needs in a manner that reflects its unique demographic characteristics, comprehensive plan vision and policies, development and infrastructure capacity, location and proximity to job centers, local workforce, and access to transportation.

3.2.1 Jurisdictions with designated regional centers should consider incorporating affordable housing allocations as part of their adopted allocations for these centers.

3.3 Each jurisdiction should plan to accommodate a sufficient supply of permanent supportive housing as defined in RCW 36.70A.030 (16), foster care housing, and those requiring special needs housing (i.e., the elderly, developmentally disabled, chronically mentally ill, physically disabled, homeless, persons participating in substance abuse programs, persons with AIDS, and victims of domestic violence) that is equitably and rationally distributed throughout the County.

AH-4 Establish a countywide housing affordability program by an organization capable of long-term consistent coordination of regional housing planning, design, development, funding, and housing management. All jurisdictions should cooperatively maximize available funding opportunities and leverage private resources in the development of affordable housing for households.

In the fall of 2018, local elected leaders began holding roundtable discussions to address housing affordability in Pierce County. In 2019, this ‘Mayor’s Roundtable’ group began calling itself the **South Sound Housing Affordability Partners (SSHAP)**. In late 2021, 14 governments signed an interlocal agreement which established an Executive Board of the member governments, an Advisory Board of key housing stakeholders, a budget for SSHAP staff, and the potential for a capital fund. As a regional coalition of cities, the Puyallup Tribe of Indians, and Pierce County, SSHAP aims to support a vision of affordable, attainable, and accessible housing in Pierce County.

<https://www.piercecountywa.gov/SSHAP>

4.1 All jurisdictions should jointly explore opportunities to develop a countywide funding mechanism and the potential for both voter-approved measures (bond or levy), and nonvoter approved sources of revenue to support the development of housing affordable to all economic segments.

4.2 All jurisdictions should jointly pursue state legislative changes to give local jurisdictions the authority to provide tax relief to developers of affordable housing.

4.3 All jurisdictions should explore opportunities to dedicate revenues from sales of publicly owned properties, including tax title sales, to affordable housing projects.

- 4.4 All jurisdictions should explore the expansion of existing non-profit partnerships, increased coordination with local public housing authorities, a county-wide land trust, as well as future involvement of larger County employers, in the provision of housing assistance for their workers.
- 4.5 Jurisdictions should evaluate inclusionary or incentive zoning measures as a condition of major rezones and development.
- 4.6 New fully contained communities- in unincorporated Pierce County shall contain a mix of dwelling units to provide for the affordable and moderate-income housing needs that will be created as a result of the development.
- AH-5 Explore and identify opportunities to reduce land costs for non-profit and for-profit developers to build affordable housing.
 - 5.1 Jurisdictions should explore options to dedicate or make available below market-rate surplus land and also identify opportunities to assemble, reutilize, and redevelop existing parcels for affordable housing projects.
 - 5.2 All jurisdictions should review and streamline development standards and regulations to advance their public benefit, provide flexibility, and minimize costs to housing.
- AH-6 Jurisdictions, shall periodically monitor and assess their success in meeting the housing needs to accommodate their 20-year population allocation.
 - 6.1 Jurisdictions should utilize the available data and analyses provided by federal, state, and local sources to monitor their progress in meeting housing demand as part of the required Growth Management Act comprehensive plan update process.
 - 6.2 Countywide housing allocations shall be monitored with each Buildable Lands Report and evaluated to determine if countywide needs are being adequately met; the evaluation should identify all regulatory, programmatic, and financial measures taken to address the allocation need.
 - 6.2.1 Each jurisdiction should provide, if available, the quantity of affordable housing units created, preserved, or rehabilitated since the previous Buildable Lands Report.
 - 6.2.2 Jurisdictions should consider using a consistent reporting template for their evaluations to facilitate the countywide monitoring and assessment.
 - 6.2.3 In conjunction with the Buildable Lands Report, a report should be forwarded from GMCC to the Pierce County Regional Council (PCRC) addressing the progress in developing new affordable housing.
- AH-7 Support and encourage homeownership opportunities for low-income, moderate-income, and middle-income families and individuals while recognizing historic inequities in access to homeownership opportunities for communities of color.
- AH-8 Jurisdictions should identify potential physical, economic, and cultural displacement of low-income households and marginalized populations that may result from planning, public

investments, private redevelopment, and market pressure, and use a range of strategies to prevent and minimize, the cultural and physical displacement and mitigate its impacts to the extent feasible.

- 8.1 Metropolitan Cities, Core Cities, and High-Capacity Transit Communities will develop and implement strategies to address displacement in coordination with the populations identified of being at risk of displacement, including residents, local community groups, and neighborhood-based small business owners.

See VISION 2050 Background in “Growth Targets” Chapter and “Urban Growth Areas” Chapter for additional information on the Regional Growth Strategy and regional geographies.
