



# Fircrest 2026 Comprehensive Plan Amendment

Complying with RCW 36.70A.070

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# Project Description

- Amend Comp Plan to correct and complete housing adequacy analysis
- Adopt needed Developments Regs to implement Comp Plan
  - STEP Housing
  - Potential for housing subsidies or incentives
- Requirement of GMA
- SB 5148 (2025) allows Commerce to randomly review up to 10 city or county Comp Plan Housing Elements and development regulations per year for RCW compliance
- 5-year Comp Plan implementation report due 2029

# 2044 Housing Needs

**769** Total Units

**Table 1 Housing Need Allocations by Income Bracket**

**(Pierce County Ordinance No. 2023-22s)**

Income Level (% of Area Median Income)		2020 Estimated Supply	Units Needed in 2044
0-30%	<i>Non-PSH*</i>	12	99
	<i>PSH*</i>	0	134
30 - 50%		140	143
50 - 80%		812	113
80 - 100%		537	49
100 - 120%		322	44
>120%		1,104	188
<b>Total</b>		<b>2,927</b>	<b>769</b>
<i>Temporary Emergency Housing Needs (beds)</i>		<i>0</i>	<i>47</i>

\*Permanent Supportive Housing (PSH)

Bracket >120% AMI not required to be planned for under HB 1220 but included for informational purposes.

# Density Assumptions

**908 Total Units**  
(surplus of 139!)

**Table 2 Land Capacity Acreage and Assumed Density**

Zone	Net Developable Land (acres)			Assumed density/pipeline units		Total baseline capacity (dwelling units)
	Vacant*	Under-utilized*	Total	Baseline assumed Dwelling units/acre	Pipeline and recent units added	
Residential-4, R-4	1.0	0.0	1.0	4	0	4
Residential-4-Conservation, R-4-C	13.0	0.0	13.0	4	0	52
Residential-6, R-6	0.4	0.0	0.4	5.5	0	2
Residential-8, R-8	0.0	0.0	0.0	8	0	0
Residential-10-Traditional Community Design, R-10-TCD	0.0	0.0	0.0	10	0	0
Residential-20, R-20	0.0	0.0	0.0	20	0	0
Residential-30, R-30	0.0	2.0	2.0	30	0	60
Neighborhood Office, NO	0.0	0.0	0.0	6	0	0
Neighborhood Commercial, NC	0.0	0.0	0.0	6	0	0
Mixed-Use Neighborhood, MUN	0.0	4.1	4.1	59	156	395
Mixed-Use Urban, MUU	0.0	2.7	2.7	59	235	395
Park, Recreation and Open Space, PROS	0.0	0.0	0.0	0	0	0
Golf Course, GC	0.0	0.0	0.0	15	0	0

Source: Pierce County 2021 Buildable Lands Report (Fourth Edition).

\*15% market/infrastructure deduction for vacant lands, 25% for underutilized.

# Affordability Assumptions

## Zoning Affordable by Income Bracket

**Table 3 Assumed Affordability Allocation Ratios by Zone**

Residential Zones	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	100-120% AMI	>120% AMI
Residential-4, R-4					0.25	0.75
Residential-4-Conservation, R-4-C					0.25	0.75
Residential-6, R-6					0.25	0.75
Residential-8, R-8			0.25	0.25	0.25	0.25
Residential-10-Traditional Community Design, R-10-TCD				0.25	0.25	0.50
Residential-20, R-20		0.25	0.25	0.25	0.25	
Residential-30, R-30	0.25	0.25	0.25	0.25		
Mixed-Use Neighborhood, MUN	0.25	0.25	0.25	0.25		
Mixed-Use Urban, MUU	0.25	0.25	0.25	0.25		
Golf Course, GC						1.00

Row add up to 100 horizontally to ensure no under/over counting.

# Resulting Capacity

Deficit of Affordable Housing

Table 4 Projected Housing Unit Scenario Surplus/Deficits

Income Level	Household Income Bracket (Pierce County median income, rounded to nearest 1k)	Surplus/ (Deficit) (Estimated Unit Capacity - Housing Need)			
		1. Baseline (No Change)	2. ADUs	3. Duplexes	Total
Extremely low income (0-30% AMI)	\$0 - \$25,000	(20)	(10)	(20)	(10)
Very Low income (30-50% AMI)	\$25,000 - \$41,000	70	80	70	80
Low income (50-80% AMI)	\$41,000 - \$66,000	100	120	100	120
Moderate income (80-120% AMI)	\$66,000 - \$99,000	134	134	153	153
<b>Total Net Capacity</b> (includes >120% AMI for overall)		<b>139</b>	<b>179</b>	<b>146</b>	<b>186</b>

# Recommended Solution

## Supplemental LCA



Applying the density assumptions established in the city's adjustments to its developable acreage and the resultant net acreage for each rezoned area (Table 2). The city then adjusted its calculations among its projected growth to clearly demonstrate whether the city's aim to meet its targeted housing projections (Table 3).

Table 2  
Adjusted Residential Development Capacity

Zone	Zoning Changes (gross developable acres)	Net Zoning Changes <sup>2</sup> (acres)	Assumed Density (units/acre)
RS-6 Single-Family Residential (Area B)	-7.8 acres (to RMH)	-7 acres	7 units/acre
RS-6 Single-Family Residential (Area C)	-12.8 acres (to MC)	-9.6 acres	7 units/acre
RMH Multiple-Family Residential (Area B)	+7.8 acres (from RS-6)	+7 acres	18 units/acre
MC Commercial Residential Mixed Use (Area C)	+12.8 acres (from RS-6)	+9.6 acres	11 units/acre

<sup>1</sup> Fractional yields from computations informing this table were rounded purposes of conservative estimating.

<sup>2</sup> Infrastructure and Market Factor deduction assumptions were based on City of Pacific by BHC (2024) and were applied to gross acreage to yield

<sup>3</sup> Density assumptions are based on Exhibit 4 of the LCA prepared for the



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Table 3  
Adjusted Capacity for all Income Levels of Projected Housing Demand

Income Level (% AMI)	Zones Serving These Needs	Aggregated Housing Needs	Capacity Prior to Zoning Adjustment	Capacity Surplus or Deficit Prior to Zoning Adjustment	Rezoning Capacity Adjustments <sup>4</sup>	Adjusted Capacity Surplus/Deficit
0-30% <sup>5</sup> PSH	RS-6, RML, RMH	12	28	(21)	32 <sup>6</sup> (+32 RMH)	43
0-30% Non-PSH		23			32 (+32 RMH)	
>30-50%	RS-6, RML, RMH	4	14	10	31 (+31 RMH)	41
>50-80%	RS-6, RML, RMH, MC	6	47	41	66 (+31 RMH, +35 MC <sup>7</sup> )	107
>80-100%	RO, RS-6, RML, RMH, MC	12	61	49	35 (+35 MC)	84
>100-120%	RO, RS-6, RS-11, MC	13	111	98	(43) <sup>8</sup> (-78 RS-6, +35 MC)	55
>120%	RO, RS-6, RS-11	65	113	48	(-38 RS-6)	10
Total		135	359	225	115	340

To mitigate against the potential for displacement caused by the city's rezoning, the city has prepared a Racially Disparate Impacts analysis (City of Pacific 2024 Comprehensive Plan, Appendix D: Housing) and has amended city policies that were identified as a challenge in the city's aim to avoid exclusionary land use practices, racially disparate impacts, and displacement. As part of the city's Comprehensive Plan Periodic Update, new and amended policies have been

<sup>4</sup> Units of capacity parenthetically referenced in this column are sourced from Table 2 of this Supplemental LCA and reflect whether capacity was added or subtracted, and identify which zone's adjustment contributes to the revised capacity.

<sup>5</sup> The City has drafted and expects to adopt land use and housing policies that formalize its intention to incentivize and potentially subsidize housing so that the lowest income bands can be served by affordable housing. See policies H-2.1, H-7.5, H-7.6, and LU-5.1.

<sup>6</sup> Of the capacity for 126 units added in the RMH zone, approximately one-fourth of the units were assigned equally throughout the four lowest income bands given the RMH zone serves the densest residential development in the city. Notably, if even a mere *one-tenth* of the added 126 units were assumed to serve each of the 0-30% PSH and 0-30% Non-PSH income bands, the city's rezoning efforts will have created sufficient capacity for all income bands of its estimated population growth.

<sup>7</sup> Of the capacity for 105 units added in the MC zone, one-third of the units were assigned equally throughout the three zones served by the zone.

<sup>8</sup> Of the capacity for 116 units removed from the RS-6 zone, one-third of the units were assigned as deducted from the >120% income band and two-thirds of the units were assigned as deducted from the 100-120% income band, given the practical assumption that the RS-6 Single-Family Residential zone is more likely to serve higher income bands, and that the majority of land in the city's lowest density zone (RS-11) is likely to be most affordable to the >120% income band.

# Project Schedule

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**January** Council Project Initiation

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**March – May** Workshop Project with PC & Public Engagement

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**March – April** Presentation of Draft Deliverable to Council

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**May** Notice to Commerce (60-Day Comment Period)

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**July** Notice SEPA and PC Public Hearing

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**August** PC Public Hearing

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**Sept** PC Resolution and Notice Council Public Hearing

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**October** Council Public Hearing

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**November** Council Action via Ordinance & Transmit Ordinance to Commerce

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**End of November**  
**Project Complete!**



# Questions?