



## AGENDA

**MEETING:** Special Meeting (not a regularly scheduled meeting)

**TIME:** Wednesday, May 29, 2019, 5:00 p.m.

**LOCATION:** Council Chambers, 1<sup>st</sup> Floor, Tacoma Municipal Building  
747 Market Street, Tacoma, WA 98402

### **A. Call to Order and Quorum Call**

### **B. Approval of Agenda and Minutes**

- Minutes – May 15, 2019 Special Meeting

### **C. Public Comments**

- Comments are accepted on Discussion Items D-1 only, since D-2 through D-7 were the subjects of two recent public hearings. Comments are limited to 3 minutes per person.

### **D. Discussion Items**

#### **1. 2020 Amendment – Assessment of Applications**

- Description: Review the scope of work for four applications proposed for inclusion in the 2020 Annual Amendment to the Comprehensive Plan and Land Use Regulatory Code.
- Action: Set June 19, 2019 as the date for the public scoping hearing
- Staff Contacts: Stephen Atkinson, 253-591-5531, [satkinson@cityoftacoma.org](mailto:satkinson@cityoftacoma.org)  
Larry Harala, 253-591-5640, [lharala@cityoftacoma.org](mailto:lharala@cityoftacoma.org).

#### **2. 2019 Amendment – Future Land Use map Implementation**

- Description: Review comments received at the public hearing on May 1, 2019 and through the comment period ending May 17, 2019; provide guidance on High Density Multifamily Zoning application; Identify specific areas for additional analysis.
- Action: Identify specific areas to discuss at the June 5, 2019 meeting; Give direction on treatment of High Density Multifamily designation.
- Staff Contact: Stephen Atkinson, 253-591-5531, [satkinson@cityoftacoma.org](mailto:satkinson@cityoftacoma.org).

#### **3. 2019 Amendment – Shoreline Master Program Periodic Review**

- Description: Review comments received at the public hearing on May 15, 2019 and through the comment period ending May 17, 2019, and staff's responses to comments.
- Action: Guidance, and as appropriate, Approval of Staff's Recommendations
- Staff Contact: Elliott Barnett, 253-591-5389, [elliott.barnett@cityoftacoma.org](mailto:elliott.barnett@cityoftacoma.org).

#### **4. 2019 Amendment – Affordable Housing Action Strategy Incorporation into the Comprehensive Plan**

- Description: Review comments received at the public hearing on May 15, 2019 and through the comment period ending May 17, 2019, and staff's responses to comments.
- Action: Guidance, and as appropriate, Approval of Staff's Recommendations
- Staff Contact: Elliott Barnett, 253-591-5389, [elliott.barnett@cityoftacoma.org](mailto:elliott.barnett@cityoftacoma.org).



**5. 2019 Amendment – Historic Preservation Code Amendments**

- Description: Review comments received at the public hearing on May 15, 2019 and through the comment period ending May 17, 2019, and staff's responses to comments.
- Action: Guidance, and as appropriate, Approval of Staff's Recommendations
- Staff Contact: Reuben McKnight, 253-591-5220, [reuben.mcknight@cityoftacoma.org](mailto:reuben.mcknight@cityoftacoma.org).

**6. 2019 Amendment – Manitou Potential Annexation**

- Description: Review comments received at the public hearing on May 15, 2019 and through the comment period ending May 17, 2019, and staff's responses to comments.
- Action: Guidance, and as appropriate, Approval of Staff's Recommendations
- Staff Contact: Lihuang Wung, 253-591-5682, [lwung@cityoftacoma.org](mailto:lwung@cityoftacoma.org).

**7. 2019 Amendment – Minor Plan and Code Amendments**

- Description: Review comments received at the public hearing on May 15, 2019 and through the comment period ending May 17, 2019, and staff's responses to comments.
- Action: Guidance, and as appropriate, Approval of Staff's Recommendations
- Staff Contact: Lihuang Wung, 253-591-5682, [lwung@cityoftacoma.org](mailto:lwung@cityoftacoma.org).

**E. Topics of the Upcoming Meeting (June 5, 2019)**

- (1) Debriefing of 2019 Amendment Public Hearings – Future Land Use Map Implementation
- (2) Planning Commission Bylaws, Membership and Leadership

**F. Communication Items****G. Adjournment**



## MINUTES

**TIME:** Wednesday, May 15, 2019, 6:00 p.m.  
**PLACE:** Council Chambers, Tacoma Municipal Building, 1<sup>st</sup> Floor, 747 Market Street, Tacoma, WA 98402  
**PRESENT:** Stephen Wamback (Chair), Anna Petersen (Vice-Chair), Carolyn Edmonds, Ryan Givens, David Horne, Jeff McInnis, Brett Santhuff, Dorian Waller  
**ABSENT:** Andrew Strobel

### **A. CALL TO ORDER AND QUORUM CALL**

Chair Wamback called the special meeting (changed starting time) to order at 6:02 p.m. A quorum was declared.

### **B. APPROVAL OF AGENDA AND MINUTES**

The agenda was approved. The minutes for the May 1, 2019 special meeting were approved as submitted.

### **C. DISCUSSION ITEMS**

#### **1. Shoreline Master Program Periodic Review – Joint Public Hearing with the Department of Ecology**

Chair Wamback called to order the public hearing at 6:13 p.m. This hearing was the second part of the Planning Commission's public hearing series for the 2019 Amendment to the Comprehensive Plan and Land Use Regulatory Code (2019 Amendment), and was a joint public hearing with the Department of Ecology (DOE). He reviewed the public hearing procedures and asked the commissioners to introduce themselves.

Elliott Barnett, Planning Services Division, and Kim Van Zwalenburg, DOE, provided an overview of the Tacoma Shoreline Master Program (SMP) and the associated periodic review. Ms. Van Zwalenburg spoke about the history of the SMP, the role of DOE in the program, and the periodic review process. Mr. Barnett then reviewed the project scope for the periodic review, noting specific topics and proposed amendments as part of the 2019 Amendment.

Chair Wamback called for testimony. The following citizen testified:

- Dave Peterson – Mr. Peterson is the acting president of the Salmon Beach Improvement Club and spoke representing the Club and the Salmon Beach community as a whole. He stated that for the past few years, they have been having discussions with city and the Department of Ecology about the restrictive building regulations that have come into place. They have been asking to build up to 25 feet, but are not able to due to the restrictions in the code. Mr. Peterson also noted that the Base Flood Elevation (BFE) was raised by 4 1/2 feet a few years ago, and that will make everyone in the community ineligible for raising the height without a huge cost. They would like to strike the BFE from the requirements for minor modifications.

#### **2. 2019 Amendment – Public Hearing**

Chair Wamback called to order the public hearing at 6:34 p.m. He reviewed the procedures for this hearing, which was the last part of the public hearing series for the 2019 Amendment and was to be conducted in four consecutive sessions, addressing the following respective subjects: (1) Affordable

Housing Acton Strategy Incorporation in the Comprehensive Plan, (2) Historic Preservation Code Amendments, (3) Manitou Potential Annexation, and (4) Minor Plan and Code Amendments.

### **(1) Affordable Housing Action Strategy Incorporation into Comprehensive Plan**

Mr. Barnett reviewed the Affordable Housing Action Strategy (AHAS). He discussed the proposed updates to the Housing Element, which include incorporating the AHAS as an implementation strategy, adding and updating policies to reflect the AHAS, and updating pertinent affordability data and opportunity mapping.

Chair Wamback called for testimony. The following citizens testified:

- Darby Kruger – Mr. Kruger and his wife moved to Tacoma after they married 36 years ago. He explained that they bought, fixed up, and then rented two homes in Hilltop. He stated that over the years as a landlord, he has gone from being able to do most of the work himself when it comes to evictions, to now having to hire a lawyer because the compliance is so complex and burdensome. He noted that the added cost of compliance will not be borne by him as the business owner, but will instead be passed onto the renter by rent increases. Mr. Kruger suggests that to increase affordable housing, the city increases density in the form of mother-in-law apartments where it won't change the character of the neighborhood, and to allow simple, clear cut, fair guidelines for tenant and landlord protections.
- Nick Malo – Mr. Malo stated that his comments would be more about the engagement process for the AHAS. He explained that he received his notice for the public meeting on April 30<sup>th</sup> and gave examples of how the language in the notice is vague and does not clearly explain what topics would affect his property. He noted the importance of the Comprehensive Plan, and anything that goes into it, in terms of how policy is developed. Mr. Malo stated that most of the amendments are agreeable, specifically affordable housing, but discussed his concern on how it will be paid for and the implications of including that in the Comprehensive Plan.
- Martha Ward – Ms. Ward is a Tacoma resident and a member of the Associated Ministries Moral Voice Working Group. She stated that they believe the well-being of the most vulnerable citizens in the community is the moral test of our City. She noted that she especially supports the housing element update, which prioritize the current housing issue. Ms. Ward explained that she believes we can meet the need by preserving current affordable housing and building permanent supportive housing. She urged the Commission to be attentive to the 'action' word in the AHAS, look at the action steps, and to do their part.
- Molly Nichols – Ms. Nichols is a resident of District 2, and is with Futurewise and the Tacoma Tenants. She stated that she is in full support of the incorporation of the AHAS. She commented on two things specifically that are missing in the AHAS, and that she believes should be added to the Comprehensive Plan. She noted that both were brought up in September and are now part of a resolution sponsored by Councilmember Beale and is being discussed by City Council. The first is to add text that would establish that the overarching Housing and Land Use Policy of the City is to redress institutionalized racism in past and present housing policies and vigorously commence efforts towards racial integration in the fabric of Tacoma's neighborhoods. Ms. Nichols would also like to see the Planning Commission more explicitly lay out the relationship between affordable housing and transportation infrastructure in the housing element of the plan.
- Jay Atkinson – Mr. Atkinson is 83 years old, retired from the Air Force, and a veteran of the Vietnam War. He has lived in Tacoma for 46 years, and last year was a no-cause eviction with no protections, told to be out in 20 days. He stated that he was a good tenant and paid on time for 30 years, but was given no consideration in allowing him time to find an affordable new place to live. He noted that he called over 70 apartment complexes, only to be told there was no availability, or that they were out of his financial means. He finally found one place available, but it was a 100% increase in rent for 50% of the space, which forced him and his wife to have to get rid of at least half of all they owned. Mr. Atkinson explained that the move from the South End of Tacoma to the West End meant that there were less amenities, including stores, restaurants, and bus service. He noted that it takes time for such analysis to take place, and while it takes place, there are countless families becoming homeless.

He stated that we need to accelerate this process and find a faster solution and range of resources for houses experiencing a housing crisis.

- Amy Pow – Ms. Pow is with the Tacoma Pierce County Health Department and supports the incorporation of the AHAS from a health perspective. She stated that according to the CDC, about half of our health outcome is based on socioeconomic and environment, and housing is a key factor. She explained that housing provides shelter for sleep which affects our health, stability of low-income families, allows children to get an education, and connects us with our neighbors. Ms. Pow stated that the Health Department encourages the City to institute inclusionary zoning along with a well strategized community building program. They also support infilling medium density, missing middle housing throughout all neighborhoods because it provides a greater chance for affordable home ownership. The Health Department recommends the Commission renames Single Family to Detached or Single Detached, and to use form based code to regulate missing middle housing.
- Leslie Malo – Ms. Malo began by stating she agrees with the affordable housing idea, especially the missing middle. She asked why we can't build multi-use units that are not high-rises, but instead create a neighborhood. She stated that children and seniors need to know their neighbors, and they should be able to live in a well-planned neighborhood, centered around a village green. She explained that she does not believe that high-rises allow for that sense of community and that they are unaffordable. Ms. Malo stated that loneliness is the new smoking, and it does not help seniors to be alone in a tiny apartment or high-rise. She urged for well planned communities where neighbors can keep an eye on the children and seniors.

## **(2) Historic Preservation Code Amendments**

Reuben McKnight, Historic Preservation Officer, gave a briefing of the Historic Preservation Code Amendments. These included enhanced demolition review, Historic Conditional Use Permit amendments and code clean up around the nomination process.

Chair Wamback called for testimony and no citizens testified.

## **(3) Manitou Potential Annexation**

Lihuang Wung, Planning Services Division, reviewed the potential annexation of a 37-acre area of unincorporated Pierce County next to the Manitou neighborhood of Tacoma. He explained the region's Urban Growth Area (UGA) designation, and presented maps with the two zoning options currently proposed, defining what the zoning changes would effect.

Chair Wamback called for testimony. The following citizens testified:

- Heidi White – Ms. White has lived in Manitou for 51 years. She noted that she doesn't care if it is annexed, but she does care about the zoning changes. She stated that she supports option 1, as long as C2 is changed to C1, and the rest is kept R2, with everything else grandfathered in and left as it is now. She explained that it is a community that does not need any big business. They like it the way it is and would not like any more multi-family as it would affect the quality of life in the area. She urged the Commission to listen to the comments the neighborhood has provided.
- Venus Dergan – Ms. Dergan has lived in Manitou for over 50 years, and has attended almost all the meetings relating to this. She stated that she considers all of the people living in the area her neighbors, and they do not pay attention to the county-city line. She noted that South Tacoma has one of the lowest incomes in the city, so there is low-income homeownership in Manitou currently. She stated that she also supports option 1, with the change from C2 to C1, as it will keep the character of the neighborhood and will be more compatible with the South Tacoma Groundwater Protection District that is proposed. She urged the commission to listen to the people who have spoken.

## **(4) Minor Plan and Code Amendments**

Mr. Wung provided an overview of the Minor Plan and Code Amendments for 2019. He explained the scope of work and objectives for the amendments, which include updating information, correcting errors

and inconsistencies, clarifying regulatory intents, and improving administrative efficiency. Mr. Wung displayed a list of the 25 issues being discussed for reference.

Chair Wamback called for testimony and no citizens testified.

Upon completing all four sessions, Chair Wamback closed the public hearing at 7:27 p.m. and asked Commissioners to provide feedback as to what additional information would be required of staff to provide at the next meeting.

- Commissioner Edmonds would like to know if the Commission has the authority or ability to make amendments to the AHAS. Specifically, she would like to know more regarding the request to add transportation language into the Housing Element.
- Commissioner McInnis would like to have a copy of the code change regarding the BFE. He would like to also see a map of Manitou Annexation area showing the changes to zoning as requested by citizens, with the C2 areas being changed to C1.
- Commissioner Santhuff requested a list or summary of the specific actions that would come back in front of the Commission for the AHAS. He also asked for a staff response to whether the South Tacoma Groundwater Protection District would have an effect on the zoning of the Manitou Annexation Area.

#### **D. TOPICS OF THE UPCOMING MEETING (June 5, 2019)**

Stephen Atkinson, Planning Services Division, presented the Commission with a potential schedule outline for the upcoming meetings and their topics. This included the option of a special meeting on May 29, 2019, and the possibility of cancelling the July 3, 2019 meeting. With the proposed schedule, the Commission would review public comments on the 2019 Amendment and staff's responses at the meetings on May 29, June 5, and June 19, and make recommendations to the City Council on June 19. The commission would also begin the application assessment process for the 2020 Amendment, including conducting a public scoping hearing on June 19. Discussion ensued, and the Commission generally concurred with the proposed schedule.

Commissioner Edmonds made a motion to hold a special meeting on May 29, 2019. Commissioner McInnis seconded the motion, and it passed with one nay.

Commissioner Edmonds made a motion to cancel the meeting on July 3, 2019. It was seconded by Vice-Chair Petersen and it passed unanimously.

#### **E. COMMUNICATION ITEMS**

In addition to the information included in the agenda, Brian Boudet, Planning Manager, asked for feedback in how the Commission would like to work through the information from the public hearings in the next meetings, in particular the re-zones. Commissioner Givens suggested organizing information by neighborhood, and identifying areas with known conflicts.

Mr. Boudet also provided the following:

- The 6-month extension of the Tideflats Interim Regulations is scheduled for City Council final reading on May 21, 2019. There was some discussion about potential concepts around permanent regulations. If that is pursued, it would likely come back before the Planning Commission.
- City Council is scheduled to conduct a study session on the Tacoma Dome Link Extension on June 11, 2019, and adopt a resolution that evening providing their final input. This will feed into the Sound Transit's Elected Leadership Group (ELG), which is meeting on May 31 and June 14. The ELG will make a final recommendation to the Sound Transit Board on which options should move forward, and the board is expected to make their decision in early July.
- City Council adopted a resolution to adopt a Transit Oriented Development (TOD) Advisory Group. That group will be forming over the next couple of months.

- A resolution related to affordable housing was discussed by City Council, but removed from their agenda at the May 14, 2019 meeting.

## **F. ADJOURNMENT**

The meeting adjourned at 7:50 p.m.

***\*These minutes are not a direct transcription of the meeting, but rather a brief capture. For full-length audio recording of the meeting, please visit:***

[http://www.cityoftacoma.org/government/committees\\_boards\\_commissions/planning\\_commission/agendas\\_and\\_minutes/](http://www.cityoftacoma.org/government/committees_boards_commissions/planning_commission/agendas_and_minutes/)





**To:** Planning Commission  
**From:** Stephen Atkinson, Planning Services Division  
**Subject:** **2020 Annual amendment – Assessment of Applications**  
**Meeting Date:** May 29, 2019  
**Memo Date:** May 22, 2019

**Action Requested:**

Review applications for the 2020 Amendment; Release the applications for public review; Set June 19, 2019 as the date for a Public Scoping Hearing to accept public testimony on the proposed scope of work for the applications.

**Discussion:**

At the meeting on May 29, 2019, the Planning Commission will review the scope of work for the following four applications currently proposed for inclusion in the package of the 2020 Annual Amendment to the Comprehensive Plan and Land Use Regulatory Code:

1. Heidelberg-Davis Land Use Designation – See Attachment 1 for the application and a staff assessment report.
2. West Slope Neighborhood View Sensitive Overlay District – See Attachment 2 for the application and a staff assessment report.
3. Transportation Master Plan Amendments – See Attachment 3 for the letter of request from the Public Works Department.
4. Minor Plan and Code Amendments – Proposed amendments intended to keep information current, address inconsistencies, correct minor errors, and clarify and improve provisions the *One Tacoma Plan* and the Land Use Regulatory Code. Specific issues are to be identified.

The assessment of applications is the first phase of the amendment process. During this phase, the Commission will consider, per TMC 13.02.045.E.2,: (1) whether or not the application is complete, and if not, what information is needed to make it complete; (2) whether or not the scope of the application should be modified, and if so, what alternatives should be considered; and (3) whether or not the application will be considered, and if so, in which amendment cycle.

The Commission will consider setting June 19, 2019 as the date for a public scoping hearing to receive feedback from the community on the scope of work, and complete the assessment process at the subsequent meeting tentatively scheduled for July 17, 2019.

**Project Summary:**

The Comprehensive Plan and its elements, as well as development regulations and regulatory procedures that implement the Comprehensive Plan, shall be adopted and amended by ordinance of the City Council following the procedures identified in Tacoma Municipal Code 13.02.045.



Proposed amendments may be considered annually, for which the amendment process shall begin in July of any given year and be completed, with appropriate actions taken by the City Council by the end of June of the following year. The application deadline for the 2020 Amendment was April 1, 2019. The first two applications mentioned above were submitted by non-City entities, while the other two applications are proposed by City departments.

**Staff Contact:**

- Stephen Atkinson, Principal Planner, [satkinson@cityoftacoma.org](mailto:satkinson@cityoftacoma.org), (253) 591-531

**Attachment:**

1. Application and Assessment Report – Heidelberg-Davis Land Use Designation
2. Application and Assessment Report – West Slope Neighborhood View Sensitive Overlay District
3. Letter of Request from Public Works – Transportation Master Plan Amendments

c. Peter Huffman, Director



# Heidelberg-Davis Land Use Designation Change Request

## Application: 2020 Amendment

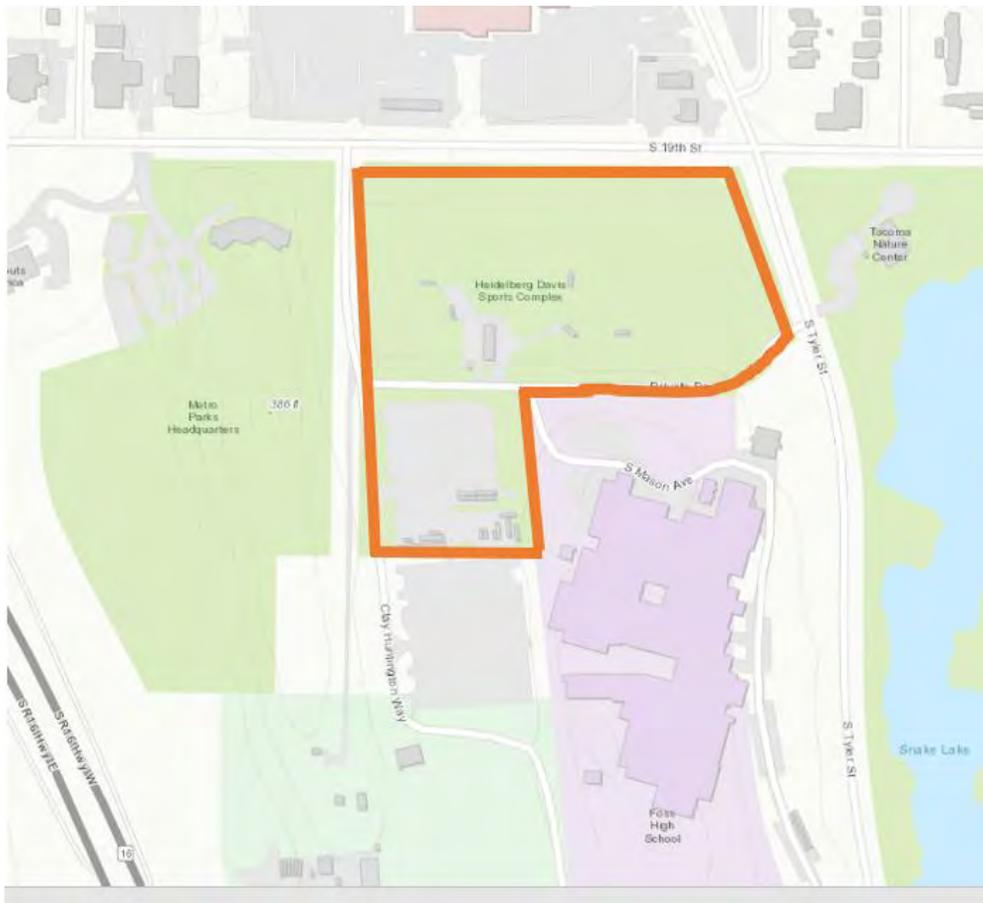
This application is a request for a land use designation change on the City of Tacoma Future Land Use Map (Figure 2 of the *One Tacoma Plan*) at the subject site from a “Parks and Open Space” to “Major Institutional Campus.”

The applicant has expressed a desire to in future to develop the site with a soccer stadium possibly including accessory educational and healthcare facilities. To ensure that the future plans are in compliance with the land use designation the applicant is requesting the change now.

Project Summary	
<b>Application No.:</b>	2020-01
<b>Applicant:</b>	Metropolitan Park District of Tacoma
<b>Location and Size of Area:</b>	1902 S Tyler Street (APN 9450000133) - 16.16 acres/703,930 SF
<b>Current Land Use and Zoning:</b>	Designated Parks and Open Space and Zoned R2- Single Family Residential
<b>Neighborhood Council Area:</b>	Central
<b>Staff Recommendation:</b>	Accept the application subject to Planning Commission direction
<b>Date of Report:</b>	5/23/2019
<b>Project Proposal:</b>	<p>A request for a land use designation change at the subject site from the “Parks and Open Space” designation to “Major Institutional Campus.”</p> <p>The applicant expresses the long term interest in developing the site with a soccer stadium and possible accessory educational and healthcare uses. The designation of Major Institutional Campus would be more appropriate given those desired uses.</p>

# Section A. Proposed Scope of Work

## 1. Area of Applicability



## 2. Background

The Heidelberg-Davis sports complex was developed in 1955 as “Snake Lake Park” and presently contains Bob Maguinez Field (a lighted baseball stadium), two lighted softball/baseball fields and two unlighted softball/baseball fields and a shared parking area. The site directly abuts Tacoma Nature Center/Snake Lake, Henry Foss High School and Metro Parks Headquarters.

- **2015/16** – Proposed Rezone as part of the area wide rezoning effort. The proposal would have rezoned the subject site from R-2 Single Family Dwelling to C-2 General Commercial. The proposal also included Cheney Stadium and Foss High School. Area residents expressed concerns about intensity and impact of possible uses allowed in the C-2 General Commercial district.

The Planning Commission concluded that the area warranted further study for a potential institutional overlay or zoning district and that, given the public ownership of the properties, a public agency master plan for the area should be considered and coordinated among the City of Tacoma, Metro Parks Tacoma, the Tacoma School District, and other stakeholders, including the Central Neighborhood Council.

- **2017** – Development of institutional zoning category considered, however during initial scoping it was determined that there were not adequate resources to continue with the project given other City Council and Planning Commission priorities at that time.

### 3. Policy Framework

#### ***How does the proposed amendment seek to implement applicable provisions of State statutes, case law, regional policies, and the Comprehensive Plan?***

The application is compliant with standards set forth in Tacoma Municipal Code 13.02.045, as well the proposal is supported by several policy elements from the City of Tacoma’s One Tacoma Comprehensive Plan. Overall the proposal seeks to bring the underlying designation more in line with what the future use of the site is intended to be, as well with adjacent Major Institutional Campus properties: Cheney Stadium and Foss High School.

#### **From the Urban Form Element of the One Tacoma Plan:**

##### ***Park and Open Space***

*This designation is intended to conserve and enhance open, natural and improved areas valuable for their environmental, recreational, green infrastructure and scenic character and the benefits they provide. The designation encompasses public and private parks and open space lands, with lands set aside for these purposes by the City of Tacoma and the Metropolitan Parks District forming the core of the designation. As more land is placed in conservation status by these agencies as well as other public and private entities, the extent of the designation will be expanded to include them.*

*The designation supports Tacoma’s vision of an integrated parks and open space system that defines and enhances the built and natural environment, supports and nurtures plant and wildlife habitat, enhances and protects trees and the urban forest, preserves the capacity and water quality of the stormwater drainage system, offers recreational opportunities, and provides pedestrian and bicycle connections. Lands within this designation include both natural open space areas and active use parks and recreational areas. Natural open space is intended to be conserved and enhanced through habitat restoration and vegetation management to maximize its environmental and stormwater benefits, along with low-impact public access such as natural area trails and viewpoints, when appropriate. Parks and recreation lands are intended to provide opportunities for active recreational such as playfields and sports facilities, and urban amenities such as plazas, pocket parks and community gardens.*

##### ***Major Institutional Campus***

*This Designation is intended for large institutional campuses that are centers of employment and that service a broader population than that of the neighborhood in which it is located. This designations includes hospitals, medical centers, colleges, universities and high schools typically greater than 10 acres in size. The designation recognizes the unique characteristics of these institutions and is intended to accommodate the changing needs of the institution while enhancing the livability of surrounding residential neighborhood and the viability of nearby business areas.*

### **Urban Form Policies:**

- Policy UF-1.5 Strive for a built environment designed to provide a safe, healthful and attractive environment for people of all ages and abilities.
- Policy UF-1.10 Leverage the power of the arts, culture and creativity to serve the communities interest while driving growth in a way that builds character and quality of place.
- Policy UF-3.4 Encourage the placement of services in centers, including schools and colleges, health services, community centers, daycare, parks and plazas, library services and justice services.
- Policy UF -3.5 Ensure that land use plans and infrastructure investments allow for and incorporate arts and culture as central components of centers and as identity forming creative processes.
- Policy UF- 3.6 Encourage public and private investment in infrastructure, economic development and community services in centers to ensure that all centers will support the populations they serve.

### **Major Campus Institutions Policies:**

- Policy EC-6.15 Support the stability and growth of Tacoma’s major campus institutions as essential service providers, centers of innovation and community activity, workforce development resources and major employers.
- Policy EC-6.18 Encourage the expansion of local colleges, trade schools and technical training institutions to increase local employment opportunities within the education sector and increase the number of students in Tacoma.

### **Parks and Recreation Goals:**

- Policy P-1.4 Provide a variety of recreational facilities and services that contribute to the health and well-being of Tacomans of all ages and abilities.
- Policy P-1.5 Establish and manage specialized recreational facilities within the park system to respond to identified public needs, take advantage of land assets, and meet cost recovery goals.
- Policy P-1.8 Maintain special recreational facilities (such as golf courses and sports stadiums) as enterprises to meet public needs, ensure maximum use, and financial self-sufficiency.
- Policy P-2.3 Encourage public-private partnerships to develop and operate publicly-accessible recreational facilities that meet identified public needs.
- Policy P-7.12 Give priority for the location of new special recreational facilities to areas that are currently underserved.
- Policy P-7.13 To the extent feasible, locate new destination facilities within or in close proximity to designated centers.

### **Public Facilities Policies:**

- Policy PFS-1.1 Plan public facilities and services that have the capacity and are located to serve existing development and future growth planned in the Urban Form Element.
- Policy PFS-7.2 Incorporate considerations of physical health and well-being into discussions regarding the location, design and operation of public facilities.

## 4. Objectives

Would the proposed amendment achieve any of the following objectives?

- *Respond to changing circumstances, such as growth and development patterns, needs and desires of the community, and the City's capacity to provide adequate services;*
- *Maintain or enhance compatibility with existing or planned land uses and the surrounding development pattern*

The proposal would meet the above objectives. The property is controlled by the primary public parks and recreational organization in the area, Metropolitan Parks District of Tacoma and their primary mission is serving Tacoma's Parks and Recreational needs. Metro Parks has a long term desire to develop the property potentially with a soccer stadium which fits with the surrounding uses. The proposal will allow Metro Parks to continue providing recreational services at the site and possible expand new service to the area which does not presently exist.

## 5. Options Analysis

Possibly consider including expanding the scope to include the Metropolitan Parks office complex which abuts the site to the west.

## 6. Proposed Outreach

Tacoma Public Schools should be consulted early and neighborhood meetings should be held for the surrounding businesses and neighborhoods which are primarily to the north of the site. Standard City of Tacoma Planning and Development Services outreach would be conducted including mailings and a webpage. Press releases would be issued in advance of meetings. There is a possibility that there could be a need for multiple neighborhood meetings depending on interest and concerns expressed by area residents.

## 7. Impacts Assessment

Given the applicants possible desire for future development of stadium, educational and health care facilities on the site, if such facilities are developed in future there could be traffic impacts.

## 8. Supplemental Information

***What studies/analysis/information will be necessary to help the Commission to select an option and make a recommendation?***

It is possible that preliminary traffic studies would be useful in this process. If the Planning Commission directs staff to accept this application and move forward on it staff will work with the applicant and the Public Works Department to ensure that any necessary reports or studies are provided.

More information and clarity on the future development of the site would be useful to provide during public outreach and for City of Tacoma staff in order to adequately consider this proposal in a transparent fashion.

## Section B. Assessment

The applications were reviewed against the following assessment criteria pursuant to TMC 13.02.045:

1. If the amendment request is legislative and properly subject to Planning Commission review, or quasi-judicial and not properly subject to Commission review.

Staff Assessment: The amendment is legislative and properly subject to Planning Commission review.

2. If there have been recent studies of the same area or issue, which may be sufficient cause for the Commission to decline further review, or if there are active or planned projects that the amendment request can be incorporated into.

Staff Assessment: While there have been similar considerations for the overall site, these considerations were City of Tacoma initiated and different enough in scope that staff does not consider this a repetitive request. The request is also appropriate given the possibility that it could be many years before Planning and Development Services is able to revisit the issue of Civic/Institutional Zoning.

3. If the amount of analysis necessary is reasonably manageable given the workloads and resources of the Department and the Commission, or if a large-scale study is required, the amendment request may be scaled down, studied in phases, delayed until a future amendment cycle, or declined.

Staff Assessment: The proposal as submitted should be reasonable to manage by staff given the current workload and resources of the department and commission.

The following sections to be completed after public hearing:

## Section C. Summary of Public Comments

Issue	Staff Response

## Section C. Recommendation

According to TMC 13.02.045, the Planning Commission will review this assessment and make its decision as to:

1. Whether or not the application is complete, and if not, what information is needed to make it complete;
2. Whether or not the scope of the application should be modified, and if so, what alternatives should be considered; and

3. Whether or not the application will be considered, and if so, in which amendment cycle. The Planning Commission shall make determinations concerning proposed amendments.

Based on the review of the proposals against the assessment criteria, staff concludes that they are ready/not ready for technical analysis. Staff recommends/does not recommend that the Planning Commission accept the application, as submitted, for consideration during the XXXX Amendment cycle.



# Application

## Proposed Amendments to The Comprehensive Plan and/or Land Use Regulatory Code

Application No.:

#2020 - \_\_\_\_\_

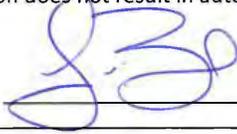
Date Received:

4/1/19

Application Deadline	Monday, April 1, 2019, 5:00 p.m.	
Application Fee	\$1,400	
Type of Amendment (Check all that apply)	<input type="checkbox"/> Comprehensive Plan Text Change <input type="checkbox"/> Regulatory Code Text Change <input checked="" type="checkbox"/> Land Use Designation Change <input type="checkbox"/> Area-wide Rezone <input type="checkbox"/> Interim Zoning or Moratorium	
Summary of Proposed Amendment  (Limit to 100 words)	<p>This is an application for a land use designation change. The property at issue is owned by the Metropolitan Park District of Tacoma and is located near SR 16 and adjacent to South 19<sup>th</sup> Street. The change would revise the City of Tacoma's Future Land Use Map designation for the property at issue from "Parks and Open Space" to "Major Institutional Campus." This change would make the property at issue consistent with the adjacent designation and allow for a broader variety of uses, including an athletic stadium, educational facilities, and hospitals and medical centers, in addition to other institutional uses.</p>	
Applicant	Name	Joe Brady
	Affiliation / Title	Chief Strategy Officer, Metropolitan Park District of Tacoma
	Address, City, State and Zip Code	4702 S. 19 <sup>th</sup> St., Tacoma, WA 98405
	E-mail	<a href="mailto:JoeB@tacomaparks.com">JoeB@tacomaparks.com</a>
	Phone	253-305-1014
Co-Applicant, or Additional Contact (If applicable)	Name	
	Affiliation / Title	
	Address, City, State and Zip Code	
	E-mail	
	Phone	
	Relationship to Applicant	

I hereby state that I am the applicant listed above and the foregoing statements and answers made, and all the information and evidence submitted are, in all respects and to the best of my knowledge and belief, true and complete. I understand that submitting this application does not result in automatic acceptance of this application or guarantee its final approval.

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

4/1/2019

## REQUIRED QUESTIONNAIRE

The applicant is responsible for providing complete and accurate information in response to the following questions. You may type in the space under each question or provide your answers in text and/or graphic form on separate sheets of paper and reference the question numbers in your answer. List and label all applicable attachments that are included with the application. The Planning Commission and Department staff reserve the right to request additional information as needed. Any modification to the application must be submitted prior to the deadline. A pre-application meeting with staff before submitting an application is strongly advised.

### **1. Project Summary** – Please provide the following information:

- (a) A description of the proposed amendment, including the amendatory language, if applicable.

The proposed amendment would change the land use designation on the Future Land Use Map for the affected parcel to Major Institutional Campus.

- (b) A description, along with maps if applicable, of the area of applicability and the surrounding areas, including identification of affected parcels, ownership, current land uses, site characteristics, and natural features.

The immediate surrounding area is comprised of City of Tacoma, Metro Parks, and Tacoma Schools District-owned properties that are located between SR 16 and South 19<sup>th</sup> Street. This includes Cheney Stadium and its support and parking facilities; Foss Highschool and its support, parking, and athletic facilities; Heidelberg-Davis Park athletic fields; and City of Tacoma parking facilities.

The parcel that would be subject to the land use designation change is Pierce County Parcel No. 9450000133. This parcel is owned by Metro Parks and is currently used as the Heidelberg-Davis athletic fields and associated parking, and as parking facilities for Cheney Stadium.

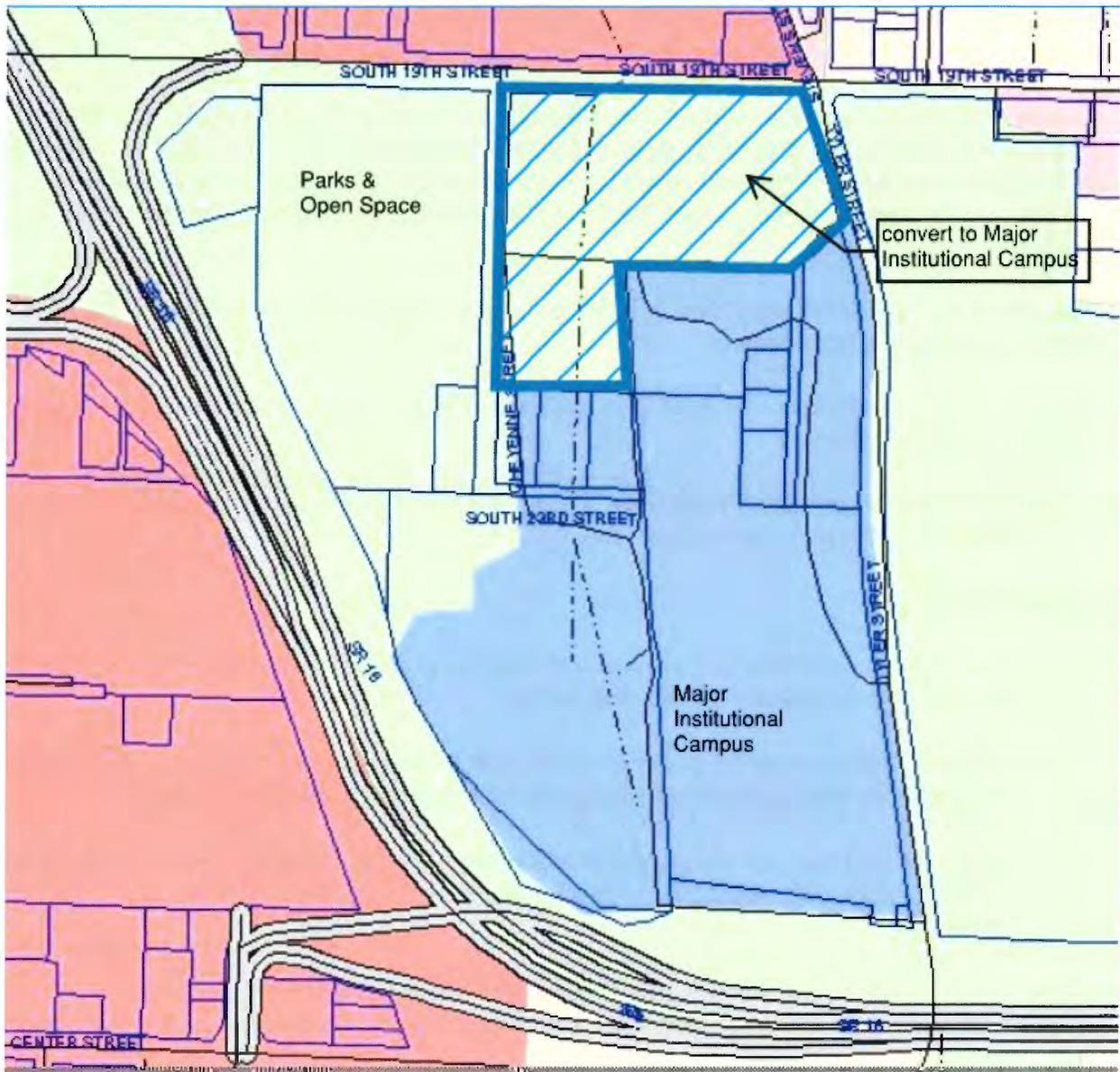
- (c) The current and proposed Comprehensive Plan land use designation and zoning classification for the affected area.

The City of Tacoma- and Metro Parks-owned properties in this area are currently in one of two designations – Major Institutional Campus and Parks and Open Space. The majority of the Metro Parks-owned property is in the Parks and Open Space classification, including the parcel at issue.

The zoning for the area is R-2 STGPD, or Single Family Dwelling District with South Tacoma Groundwater Protection overlay.

The proposed land use designation change would be to Major Institutional Campus, as shown on the following map:





The City of Tacoma- and Metro Parks-owned properties in this area constitute a “Public Facilities Site” under Tacoma Municipal Code (“TMC”) 13.06.700.P. Future uses may be approved and conditioned pursuant to a Development Regulation Agreement with the City of Tacoma as authorized by TMC 13.06.601. Such future uses may include a stadium with an associated medical center, a potential sports museum, and educational facilities.

2. **Background** – Please provide appropriate history and context for the proposed amendment, such as prior permits or rezones, concomitant zoning agreements, enforcement actions, or changes in use.

This area has been zoned Single Family Dwelling District for many years. In 1988, the City of Tacoma established the South Tacoma Groundwater Protection District (TMC 13.09), which prohibits uses such as chemical manufacturing, creosote treatment, manufacture of certain flammable liquids, petroleum refining, wood products preserving, and hazardous waste treatment from the district and requires a

permit from the Health Department before constructing/modifying/or changing the use of any structures or land used for storing, handling, or disposing hazardous waste.

Cheney Stadium was originally constructed in 1960 and underwent a major remodel in 2010. The remodel was vetted and approved through a Conditional Use Permit (CUP). The building was approved to a maximum height of 70 feet, and capacity of the structure to 7,839 seats. Parking to the north of the stadium is shared with Foss High School. The City of Tacoma owns the stadium and associated parking parcels.

Foss High School and Gymnasium were originally constructed in 1979. It is unclear whether the high school required any special permits.

The Heidelberg-Davis Park athletic fields were established in 1955. Prior to that the parcel was part of the Snake Lake park property.

**3. Policy Review** – Please identify and cite any applicable policies of the Comprehensive Plan that provide support for the proposed amendment.

Urban Form Policies:

- Policy UF-1.5 Strive for a built environment designed to provide a safe, healthful, and attractive environment for people of all ages and abilities.
- Policy UF-1.10 Leverage the power of the arts, culture and creativity to serve the community's interest while driving growth in a way that builds character and quality of place.
- Policy UF-3.4 Encourage the placement of services in centers, including schools and colleges, health services, community centers, daycare, parks and plazas, library services, and justice services.
- Policy UF-3.5 Ensure that land use plans and infrastructure investments allow for and incorporate arts and culture as central components of centers and as identity forming creative processes.
- Policy UF-3.6 Encourage public and private investment in infrastructure, economic development, and community services in centers to ensure that all centers will support the populations they serve.

Major Campus Institutions Policies:

- Policy EC-6.15 Support the stability and growth of Tacoma's major campus institutions as essential service providers, centers of innovation and community activity, workforce development resources and major employers
- Policy EC-6.18 Encourage the expansion of local colleges, trade schools and technical training institutes to increase local employment opportunities within the education sector and increase the number of students in Tacoma.

### Parks and Recreation Goals:

- Policy P-1.4 Provide a variety of recreational facilities and services that contribute to the health and well-being of Tacomans of all ages and abilities.
- Policy P-1.5 Establish and manage specialized recreational facilities within the park system to respond to identified public needs, take advantage of land assets, and meet cost recovery goals.
- Policy P-1.8 Maintain special recreational facilities (such as golf courses and sports stadiums) as enterprises to meet public needs, ensure maximum use, and financial self-sufficiency.
- Policy P-2.3 Encourage public-private partnerships to develop and operate publicly-accessible recreational facilities that meet identified public needs.
- Policy P-7.12 Give priority for the location of new special recreation facilities to areas that are currently underserved.
- Policy P-7.13 To the extent feasible, locate new destination facilities within or in close proximity to designated centers.

### Public Facilities Policies:

- Policy PFS-1.1 Plan public facilities and services that have the capacity and are located to serve existing development and future growth planned in the Urban Form Element.
- Policy PFS-7.2 Incorporate consideration of physical health and well-being into decisions regarding the location, design, and operation of public facilities.

#### **4. Objectives** – Please describe how the proposed amendment achieves the following objectives, where applicable:

- (a) Address inconsistencies or errors in the Comprehensive Plan or development regulations;
- (b) Respond to changing circumstances, such as growth and development patterns, needs and desires of the community, and the City's capacity to provide adequate services;
- (c) Maintain or enhance compatibility with existing or planned land uses and the surrounding development pattern; and
- (d) Enhance the quality of the neighborhood.

This proposal would expand the Major Institutional Campus designation that includes Cheney Stadium and Foss High School to include the adjacent Heidelberg-Davis athletic fields parcel.

While there is overlap in the purposes of Major Institutional Campus and Parks and Open Space designations, the Major Institutional Campus allows for a broader variety of uses. Uses that are contemplated for this area at this time include a soccer stadium with an associated medical center, a potential sports museum, and educational facilities, which are allowed under the Major Institutional Campus designation. These uses would respond to the needs of the community and would enhance the quality of the neighborhood.

- 5. Community Outreach** – Please provide a description of any community outreach that you have conducted, and the response received, with respect to the proposed amendment.

The Applicant will reach out to the Central Neighborhood Council, neighboring landowners, and the public living in the vicinity to discuss this application and the contemplated uses for the parcel at issue, including a soccer stadium with an associated medical center, a potential sports museum, and educational facilities. The contemplated uses may also intersect with potential projects in the same location(s) currently undergoing feasibility, the results and conclusions from which may guide additional public outreach.

- 6. Supplemental Information** – Please provide supplemental information as you deem appropriate and necessary and/or as may be requested by the Department, which may include, but is not limited to, completion of an environmental checklist, wetland delineation study, visual analysis, or other studies.

To be determined.



# West Slope Neighborhood View Sensitive Overlay District

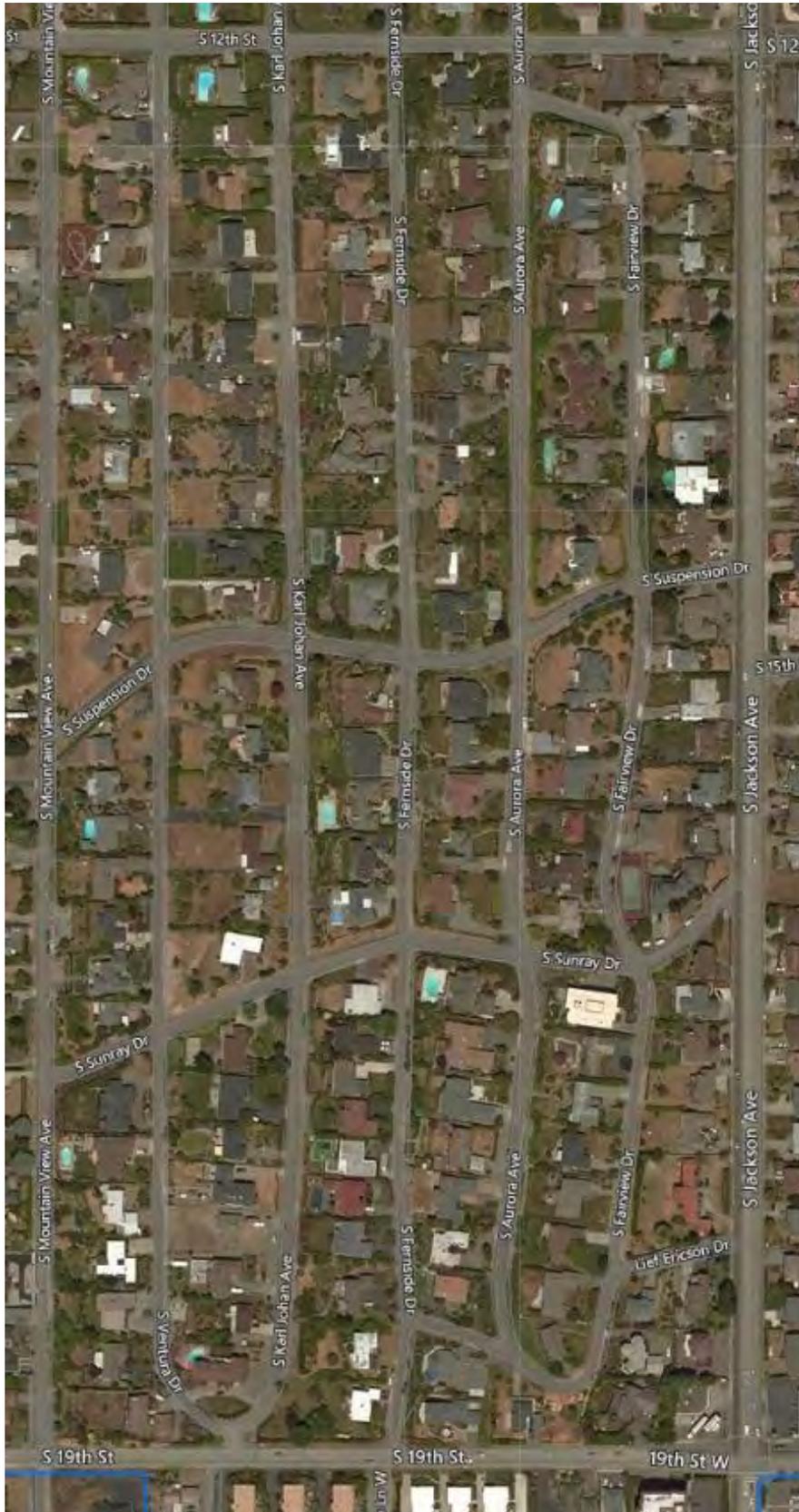
## Application: 2020 Amendment

A request by the West Slope Neighborhood Coalition to amend the existing View Sensitive Overlay District code requirements. The proposed requirements would be applied only to the Narrowmoor Additions area which is an approximately 349 lot subdivision within the West Slope area of Tacoma. The proposal would decrease allowed building height from 25 feet to 20 feet in the View Sensitive Overlay District within that area only.

The applicant has requested an Area-Wide Rezone and staff is requesting this be considered as a Regulatory Code Text Change as this action would not change the Land Use Designation of the area, nor change the View Sensitive Overlay District, rather the applicant is seeking refinement of the existing View Sensitive Overlay District height restriction, which would be a code amendment to Tacoma Municipal Code Title 13.

Project Summary	
Application No.:	2020-02
Applicant:	Mark Lewington on behalf of the West Slope Neighborhood Coalition (WSNC)
Location and Size of Area:	<p>Area approximately within the following boundaries –</p> <ul style="list-style-type: none"> <li>• South Jackson Avenue</li> <li>• 6<sup>th</sup> Avenue (there are a few lots north of 6<sup>th</sup> Ave)</li> <li>• South Mountain View Avenue</li> <li>• 19<sup>th</sup> St West</li> </ul> <p>An approximately 349 lot area comprised of Narrowmoor Additions 1-4 (Approximately 170 acres)</p>
Current Land Use and Zoning:	<p>Land Use Designation: Single Family Residential</p> <p>Zoning: R-1 Single Family Dwelling &amp; View Sensitive Overlay District</p>
Neighborhood Council Area:	West End
Staff Recommendation:	Staff is seeking more guidance on scope of the request from the Planning Commission
Date of Report:	5/29/19
Project Proposal:	To amend the existing View Sensitive Overlay District requirements, which would be applied only to the Narrowmoor Additions area (West Slope). The proposal would decrease allowed building height from 25 feet to 20 feet in the View Sensitive Overlay District within that area only.





## 2. Background

The “Narrowmoor Neighborhood” is comprised of four plats that were initially established in 1941, with a majority of lots developed by the mid-1960s. The View Sensitive Overlay District was created in the late 1980s with the intention of view preservation by restricting building height at 25 feet.

This request has a substantial background regarding attempts to on an area wide basis preserve views and the character of the subject area. The City of Tacoma examined the area as a potential historic district in 2009. The West Slope Neighborhood Coalition making application to create a conservation district in 2015. Both efforts were ultimately unsuccessful when the City Council opted to decline the request. Also a general consideration was made in 2017 relating to the View Sensitive Overlay District when the City of Tacoma considered possible amendment of the View Sensitive Overlay District requirements in Old Town pertaining specifically to commercially zoned properties.

Staff sees that possibly a compelling case can be made that this request is repetitive of policy consideration by the Planning Commission and City Council in the recent past. Staff also sees that this request could possibly be considered as a new and distinct request. Staff is seeking policy guidance from the Planning Commission on how to treat this application.

- In 2015 there was a request to create a conservation district for the West Slope area that was denied by the City Council.
- In 2017 the City of Tacoma explored a code amendment relating to the View Sensitive Overlay District pertaining specifically to commercial properties in Old Town. The City Council choose to table that discussion at the time and requested that a general review of the View Sensitive Overlay District be considered during a future work plan.

## 3. Policy Framework

***How does the proposed amendment seek to implement applicable provisions of State statutes, case law, regional policies, and the Comprehensive Plan?***

The proposal would comply with many elements of the comprehensive plan and the applicant cites those well in the application, however, staff will point out that adequately measuring the impact that implementation of this proposal would have at this time, given the information available staff finds this speculative. Existing code is in place in the area that restricts building height above 25 feet, R-1 single family zoning is also in place in the area which limits lot size and overall density. Also staff will note that this area has no special historic designation.

In order to establish that the proposed further restriction of height ultimately benefits the area outweigh any possible drawbacks, more information would be needed. The applicant has stated that consultant/surveyor work has been done on this and staff will seek to acquire, review and incorporate those materials into the backup if the Planning Commission chooses to move forward with this request.

***The applicant has cited the following policies in support of this application:***

Policy UF-13.4 New Development Should be oriented to take advantage of the view of Commencement Bay and the Tacoma Narrows and to preserve significant public views.

Goal DD-1: Design new development to respond to and enhance the distinctive physical, historic, aesthetic and cultural qualities of its location, while accommodating growth and change.

Policy DD-1.6 Encourage the development of aesthetically sensitive and character-giving design features that are responsive to place and the cultures of communities.

Policy DD-1.7: Encourage residential infill development that completes the general scale, character, and natural landscapes features.

Policy DD-4.3: Encourage residential infill development that complements the general scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, open space patterns, and landscaping. Allow a range of architectural styles and expression, and respect existing entitlements.

Policy DD-4.7: Emphasize the natural physical qualities of the neighborhood (for example, trees, marine view, and natural features) and the site in locating and developing residential areas, provided such development can be built without adversely impacting the natural areas. Where possible, development should be configured to utilize existing natural features as an amenity to development.

Goal DD-6: Protect and preserve designated significant scenic resources, including public views and scenic sites.

Policy DD-6.2: Notes scenic views recognized as publicly beneficial to Tacoma; includes views from Narrows Drive of The Narrows, bridges and Gig Harbor.

Policy DD-6.3: Encourage new public and private development to creating new public views of Mount Rainer, Commencement Bay, and Tacoma Narrows, bridges, gulches, the Downtown Skyline and other landmark features.

Policy DD-6.4: Consider the impacts of new landscape plantings on designated public views and scenic resources and provide allowances for the pruning of trees and shrubs to maintain or enhance designated public views.

#### **4. Objectives**

Would the proposed amendment achieve any of the following objectives?

- Address inconsistencies or errors in the Comprehensive Plan or development regulations;
- Respond to changing circumstances, such as growth and development patterns, needs and desires of the community, and the City's capacity to provide adequate services;
- Maintain or enhance compatibility with existing or planned land uses and the surrounding development pattern; and/or
- Enhance the quality of the neighborhood.

The applicant states that all four objectives are met here, however, staff is neutral on how this proposal would address inconsistencies in the Comprehensive plan. An argument supporting that view might be possible, but staff feels that has not been proven with the materials provided in the application. Staff perspective is that more information would be necessary to make a compelling argument regarding the benefits of a 20-foot vs. 25-foot VSD height restriction. Staff will point out that existing code has been in place since the late 1980s and despite some common complaints and concerns it has generally worked regarding the restriction of building height in the view sensitive areas of the City of Tacoma.

Regarding changing circumstances in the area, staff concurs that development in the West Slope has changed since many of these homes were constructed, and the proposal has potential to help address some of the negative consequence of new development in the area. Relating to the enhancement of compatibility and quality of the neighborhood ideally the proposal could help preserve the existing quality of the neighborhood. The applicant also states that new DADU regulation may cause undue impact to views in the area and staff has no position on this statement at this time, it is possible that DADU/ADU construction may or may not have significant impact to views in this area.

## 5. Options Analysis

While certainly there are many options to consider, staff sees the following options as the primary pathways forward on this request.

- Tacoma Municipal Code Title 13 could be amended to simply describe the Narrowmoor Additions boundary and within that area the 20-foot height limit could be imposed and this item could be handled strictly as a code amendment.
- The Commission could direct staff to consider the request in a future work program addressing the issue on a city wide basis and then this request could be incorporated into a more thorough broad based effort.
- Reject the application as it is repetitive of two previous efforts to address this concern, which have been considered and rejected.

## 6. Proposed Outreach

While the applicant has indicated that somewhat extensive outreach has been conducted within the area, some or most of those activities were conducted possibly as far back as 2014. The input of all of the property owners within the subject area is vital and a series of neighborhood meetings, multiple mailings, possibly surveys, could likely be necessary. While it is unlikely there would be negative impacts to surrounding community as a result of this proposal it may be prudent to seek the input of the surrounding area.

At minimum it is likely that several neighborhood meetings would be required to ensure that the area is fully aware of and supportive of the proposal, which would include mailings and the creation of a project specific webpage.

## 7. Impacts Assessment

The applicant sites studies in the application packet and those would need to be submitted, also further analysis of the impact to adjacent properties would need to be considered. More information regarding view corridor analysis, and

further explanation as to how the 20 foot figure was arrived at. Will this be adequate to address the needs expressed. Are there further refinements required such as a further limiting of height of accessory structures?

This could also be a precedence setting proposal that could encourage other areas to seek similar measures in future years. This could have general workload impacts and could also lead to inconsistency in the code.

## 8. Supplemental Information

The applicant sites previous work done by consultants and/or surveyors in the application packet and those reports would need to be submitted, it is possible that expert analysis would need to be done to confirm some of the statements in the application packet, for example the cited average height of structures in the area.

## Section B. Assessment

The applications were reviewed against the following assessment criteria pursuant to TMC 13.02.045:

1. If the amendment request is legislative and properly subject to Planning Commission review, or quasi-judicial and not properly subject to Commission review.

Staff Assessment: The amendment is legislative and properly subject to Planning Commission review.

2. If there have been recent studies of the same area or issue, which may be cause for the Commission to decline further review, or if there are active or planned projects that the amendment request can be incorporated into.

Staff Assessment: In 2015 there was a request to create a conservation district for the West Slope area, while this request is different in scope staff could see a compelling argument that the primary intent is the same. In 2017 the Planning Commission and City Council considered amending the View Sensitive Overlay District code on a citywide basis and opted to table the idea due to a scope that was too far ranging.

3. If the amount of analysis necessary is reasonably manageable given the workloads and resources of the Department and the Commission, or if a large-scale study is required, the amendment request may be scaled down, studied in phases, delayed until a future amendment cycle, or declined.

Staff Assessment: If this action is restricted to the Narrowmoor Additions area (approximately 330 parcels) exclusively this request could potentially fit into the 2020 work plan for the Planning Commission and the Long Range Planning group. This proposal would also potentially be more manageable with engagement of a consultant to assist independent technical evaluation necessary. At minimum in the range of \$35,000.00 to \$50,000.00 to engage expert architectural advisement for expert advice and support during the Planning Commission, neighborhood meeting and City Council phases of the project.

If however the policy direction is to consider evaluating the View Sensitive Districts at the citywide level this would be of a sufficient scope that it will be beyond the 2020 resources of the Long Range Planning Group and would likely trigger the need for engagement of significant consulting services which are also beyond the funds available for such activities in 2020.

The following sections to be completed after public hearing:

## Section C. Summary of Public Comments

Issue	Staff Response

## Section C. Recommendation

According to TMC 13.02.045, the Planning Commission will review this assessment and make its decision as to:

1. Whether or not the application is complete, and if not, what information is needed to make it complete;
2. Whether or not the scope of the application should be modified, and if so, what alternatives should be considered; and
3. Whether or not the application will be considered, and if so, in which amendment cycle. The Planning Commission shall make determinations concerning proposed amendments.

Based on the review of the proposals against the assessment criteria, staff concludes that they are ready/not ready for technical analysis. Staff recommends/does not recommend that the Planning Commission accept the application, as submitted, for consideration during the XXXX Amendment cycle.



# Application

## Proposed Amendments to The Comprehensive Plan and/or Land Use Regulatory Code

Application No.:

#2020 - \_\_\_\_\_

Date Received:

4/1/19  
*[Signature]*

Application Deadline	Monday, April 1, 2019, 5:00 p.m.	
Application Fee	\$1,400 (Fee exemption requested as the West Slope Neighborhood Coalition is a local community organization involved in long-term planning for over 30 years. This application also has the support of the West End Neighborhood Council.)	
Type of Amendment (Check all that apply)	<input type="checkbox"/> Comprehensive Plan Text Change <input type="checkbox"/> Regulatory Code Text Change <input type="checkbox"/> Land Use Designation Change <input checked="" type="checkbox"/> Area-wide Rezone <input type="checkbox"/> Interim Zoning or Moratorium	
Summary of Proposed Amendment  (Limit to 100 words)	<p>The West Slope Neighborhood Coalition (WSNC) seeks an Area-Wide Rezone encompassing the Narrowmoor Additions (1 through 4) to restrict the allowable height of structures to 20 feet.</p> <p>As the homes within the Narrowmoor Additions average a height of approximately 16', the current allowance of 25' currently allowed within the West End View Sensitive District is insufficient to preserve the marine and mountain views that the area enjoys. It is therefore crucial that reasonable height restrictions be imposed to ensure the effectiveness of the View Sensitive District as applied to the particular case of the Narrowmoor Additions.</p>	
Applicant	Name	Mark Lewington
	Affiliation / Title	Chair, View Sensitive Overlay Committee, WSNC
	Address, City, State and Zip Code	1502 S. Karl Johan Tacoma, WA 98465
	E-mail	<a href="mailto:notgniwelm@gmail.com">notgniwelm@gmail.com</a>
	Phone	253-209-3772
Co-Applicant, or Additional Contact (If applicable)	Name	Jane Evancho
	Affiliation / Title	West Slope Neighborhood Coalition, Chair,
	Address, City, State and Zip Code	922 S. Mt. View Avenue Tacoma, WA 98465
	E-mail	<a href="mailto:jane.evancho@wamail.net">jane.evancho@wamail.net</a>
	Phone	253-565-9744
	Relationship to Applicant	Chair of sponsoring organization.

I hereby state that I am the applicant listed above and the foregoing statements and answers made, and all the information and evidence submitted are, in all respects and to the best of my knowledge and belief, true and complete. I understand that submitting this application does not result in automatic acceptance of this application or guarantee its final approval.

Signature: \_\_\_\_\_

*[Handwritten Signature]*

Date: \_\_\_\_\_

4-1-19

### REQUIRED QUESTIONNAIRE



WEST SLOPE NEIGHBORHOOD COALITION  
**Application**  
**Proposed Amendments to The Comprehensive Plan**  
**and/or Land Use Regulatory Code**

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Questionnaire Response

**1. Project Summary –**

(a) Proposed Amendment:

An amendment to the Comprehensive plan to establish *an area-wide rezone defined by the boundaries of the Narrowmoor Additions that restricts the height of structures to 20'*.

(b) Description of the area of applicability:

Narrowmoor Additions 1, 2, 3, and 4. (See maps of area at Attachment 1)

(c) The current and proposed Comprehensive Plan land use designation and zoning classification:

Current zoning is "R- 1, Single Family Dwelling District" consisting of low-intensity development. The area also lies within the West End View-Sensitive District. Narrowmoor encompasses approximately 170 acres with 349 residential lots. Other than reducing the allowable height of buildings in the Narrowmoor Additions, there is no change proposed to the land use designation and zoning classification.

**2. Background -**

The intent of this rezone is to improve the existing view protections that currently apply since the Narrowmoor Additions are located within the West End View Sensitive District (VSD). The VSDs implemented by the City of Tacoma in 1989 were intended to preserve views where deemed appropriate due to the geography and orientation of the landscape in Tacoma's West End, North End and Northeast Tacoma. Unfortunately, the limitation of 25' that the VSD's imposed was a "one size fits all" approach that has failed to sufficiently protect the views in Narrowmoor where, due to the original development design, the average height of homes are much lower than the city-wide average.<sup>1</sup> A comprehensive survey conducted in March of 2019 by a 2-man team using a laser sighting device<sup>2</sup> measured 330 homes in Narrowmoor and determined the average height to be 16.1'. This is not

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<sup>1</sup> The View Sensitive Area Study included a building height survey conducted by the City of Tacoma that noted "...the average height of housing in the West End is 18.1 feet measured from the foundation to the peak on the non-view side." The study was based on a sampling of homes throughout the West Slope and was not focused on the Narrowmoor Area. As the study noted, "The height of measurements are not exact and are only intended to generally indicate the height of the existing homes."

<sup>2</sup> All homes visible from the public right-of-way were measured in accordance with the methodology used by the City in its study, from the foundation-ground line on the uphill side of the structure to the roof peak/ridgeline.

WEST SLOPE NEIGHBORHOOD COALITION  
**Application**  
**Proposed Amendments to The Comprehensive Plan**  
**and/or Land Use Regulatory Code**

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surprising as the predominant style of homes in the area are single-story ranch houses or 2-level homes with a lower-level, daylight basement.

The primary concern is that, with the City's intent to increase densification, to include up-zoning of residential areas to allow accessory dwelling units (ADU's), there will be increasing pressures to build structures that are not only unsympathetic<sup>3</sup> to the predominant design in the area but, if built to the height of the allowable 25', will have a severe impact on the shared view shed of the Narrowmoor Additions.

### **3. Policy Review –**

#### **City of Tacoma Comprehensive Plan:**

##### **Book Two: Pattern Area 1: Post-War Slopes**

"These areas were primarily developed during the post-war period and is characterized by the prevalence of garages, curvilinear streets, and cul-de-sac development. The disrupted street grid limits route directness but lends itself to a sense of privacy and security within neighborhoods. Houses tend to be ranch, double-ranch, or more contemporary building styles, often with garages more prominently situated at the front of the structure and facing the street, as alleys are rare. Many homes have long frontages and are typically 1 – 1.5 stories as the area includes view overlays." (P. 2-58)

**Policy UF-13.4** *New development should be oriented to take advantage of the view of Commencement Bay and the Tacoma Narrows and to preserve significant public views.*

##### **Book Three:**

**Design and Development Goals:** {To convey the City's intent to, among other things, "Guide historic and cultural resource and *scenic view preservation.*"}  
(Pg 3-3)

**Goals + Policies:** High quality design contributes to the beauty, livability, resilience and functionality of the city as a whole. Clear policy guidance and direction on Tacoma's desired design and development character will help preserve and enhance the character of the city's neighborhoods and promote Tacoma as an inviting and inspiring place. (Pg 3-5)

**Goal DD-6:** Protect and preserve designated significant scenic resources, including public views and scenic sites. (Pg 3-2)

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<sup>3</sup> Examples of unsympathetic construction are provided at Attachment 2.

WEST SLOPE NEIGHBORHOOD COALITION  
**Application**  
**Proposed Amendments to The Comprehensive Plan**  
**and/or Land Use Regulatory Code**

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**Goal DD-1:** Design new development to respond to and enhance the distinctive physical, historic, aesthetic and cultural qualities of its location, while accommodating growth and change. (Pg 3-5)

**Policy DD-1.6:** Encourage the development of aesthetically sensitive and character-giving design features that are responsive to place and the cultures of communities. (Pg 3-5)

**Policy DD-1.7:** Encourage development that responds to and enhances the positive qualities of site and context – the block, the public realm, and natural features. (Pg 3-6)

**Policy DD-4.3:** Encourage residential infill development that complements the general scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, open space patterns, and landscaping. Allow a range of architectural styles and expression, and respect existing entitlements. (Pg 3-10)

**Policy DD-4.7:** Emphasize the natural physical qualities of the neighborhood (for example, trees, marine view, and natural features) ... Where possible, development should be configured to utilize existing natural features as an amenity to the development. (Pg 3-11)

**Policy DD-6:** Protect and preserve designated significant scenic resources, including public views and scenic sites. (Pg 3-16)

**Policy DD-6.2:** Notes scenic views recognized as publicly beneficial to Tacoma; includes views from Narrows Drive of The Narrows, bridges and Gig Harbor. (P-3-17)

**Policy DD-6.3:** Encourage new public and private development to creating new public views of Mount Rainier, Commencement Bay, Tacoma Narrows, bridges, gulches, the Downtown Skyline and other landmark features. (Pg 3-17)

**Policy DD-6.4 :** Consider the impacts of new landscape plantings on designated public views and scenic resources and provide allowances for the pruning of trees and shrubs to maintain or enhance designated public views. (Pg 3-17)

WEST SLOPE NEIGHBORHOOD COALITION  
**Application**  
**Proposed Amendments to The Comprehensive Plan**  
**and/or Land Use Regulatory Code**

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**4. Objectives –**

The proposed 20' limit on structural height all relate directly or indirectly to the 5 objectives noted below:

- (a) *Address inconsistencies or errors in the Comprehensive Plan or development regulations.*

There is an inconsistency in the relative view protection provided in View Sensitive Districts city-wide compared to the special conditions of the Narrowmoor Additions.

- (b) *Responding to changing circumstances, such as growth and development patterns, needs and desires of the community, and the City's capacity to provide adequate services.*

The trend towards densification and up-zoning in residential areas will place increasing pressure on view sensitive areas where unsympathetic construction may impact the collective view interests of the residents.

- (c) *Maintain or enhance compatibility with existing or planned land uses and the surrounding development pattern; and*

An enhanced view protection measure will help maintain compatibility with the unique development pattern of the Narrowmoor Additions.

- (d) *Enhance the quality of the neighborhood.*

Protecting the view shed of the Narrowmoor Additions will be crucial to preserving the quality of the neighborhood.

**5. Community Outreach –**

The preservation of views in the West Slope area has been a long-time cause of the WSNC and Narrowmoor residents in particular, have expressed similar concerns in response to the WSNC's annual dues notice and requests for comments.

To address the specific, current situation in Narrowmoor, in early March of 2019, the WSNC mailed out a survey to all residents of the Narrowmoor Residents<sup>4</sup> using addresses available from the records of the Pierce County Assessor Treasurer's office. Of 331 cards mailed out, 154 (47%) were received. Of the responses, 88% favored the revised 20' height limitation and 12% opposed it.

In a vote at their regularly scheduled meeting, March 20, 2019, the West End Neighborhood Council voted to support this application. Their letter will be forthcoming.

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<sup>4</sup> Example of the survey card is provided at attachment 3.

WEST SLOPE NEIGHBORHOOD COALITION  
**Application**  
**Proposed Amendments to The Comprehensive Plan**  
**and/or Land Use Regulatory Code**

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**6. Supplemental Information -**

Since its origins, the City of Tacoma has been appreciative of its many natural endowments by virtue of its location in the Pacific Northwest, even marketing these attributes to potential businesses and residents as great reasons to move to the area. Wrapped on three sides with a Puget Sound shoreline and having numerous hills and vantage points to view these waters as well as the Olympic Mountains to the west and the cascades and Mt. Rainier to the east, the city has a lot to brag about. Thankfully, the City has shown the foresight to preserve those views through policy statements in the Comprehensive Land Use Plan and the implementation of restrictions in designated view sensitive areas, as well as controls on structural heights along the Thea Foss Waterway and Ruston Way.

The West End Neighborhood Council shares view concerns as well, with approximately half of its District 1 area contained within View Sensitive Districts (West End and North End).

We submit that the Narrowmoor Additions are a special case given the unique qualities and the planned development pattern that was originally and specifically designed to protect the view shed.

# NARROWMOOR

## FIRST ADDITION

SCALE 1"=20'

SHEET 1 OF 2 SHEETS

KNOW ALL MEN BY THESE PRESENTS, WE EIVIND ANDERSON AND ASLAUG ANDERSON, HUSBAND AND WIFE, NOW AND AT ALL TIMES SINCE ACQUIRING THE LAND HEREIN DESCRIBED, OWNERS OF ALL THAT PART OF NORTHWEST QUARTER OF SECTION 3, TOWNSHIP 20 NORTH RANGE 2 EAST, WILLAMETIC MERIDIAN LYING SOUTHERLY AND SOUTHEASTERLY OF THE SOUTHERLY AND SOUTHEASTERLY LINE OF SIXTH AVENUE, WHICH LINE IS 40 FEET SOUTHERLY AND SOUTHEASTERLY, MEASURED AT RIGHT ANGLE THEREOF, FROM CENTER LINE OF SIXTH AVENUE, DESCRIBED AS FOLLOWS BEGINNING ON EAST LINE OF SD. SUBDIVISION 940.83 FEET SOUTH OF NORTHEAST CORNER OF SAID SUBDIVISION THENCE WEST, NORTHWEST QUADRANT BEING 89° 45' 11", 205.85 FEET, THENCE ON A CURVE TO LEFT, RADIUS 300 FEET A DISTANCE OF 535.11 FEET, CENTRAL ANGLE 102° 12', THENCE ON A CURVE TO RIGHT, RADIUS 350 FEET, A DISTANCE OF 473.93 FEET, CENTRAL ANGLE 77° 35', THENCE ON TANGENT, 864.2 FEET, THENCE ON A CURVE TO RIGHT, RADIUS 300 FEET, A DISTANCE OF 98.08 FEET, CENTRAL ANGLE 18° 44', THENCE ON TANGENT 839.25 FEET, THENCE ON A CURVE TO LEFT, RADIUS 300 FEET A DISTANCE OF 268.00 FEET MORE OR LESS TO WEST LINE SAID SUBDIVISION AT A POINT 709.78 FEET MORE OR LESS NORTH OF SOUTHWEST CORNER SAID SUBDIVISION, EXCEPTING THE EAST 30 FEET OF SAID DESCRIBED LAND FOR JACKSON AVENUE, HERETOFORE ACQUIRED BY THE CITY OF TACOMA AND CONTAINING 67.66 ACRES MORE OR LESS, HAVE CAUSED THE SAME TO BE SURVEYED AND PLATTED AS SHOWN HEREON, SUCH PLAT OR SUBDIVISION TO BE HEREAFTER KNOWN AS NARROWMOOR FIRST ADDITION, AND THAT WE HEREBY DONATE AND DEDICATE TO THE USE OF THE PUBLIC FOREVER THE STREETS, AVENUES, ALLEYS, ROADS AND OTHER PUBLIC PLACES SHOWN OR INDICATED THEREON AND FOR OURSELVES, OUR SUCCESSORS AND ASSIGNS WAIVE ALL CLAIMS FOR DAMAGES TO THE PROPERTY INCLUDED IN THE PLAT BY REASON OF ANY CUTS OR FILLS MADE IN THE STREETS, AVENUES ALLEYS AND ROADS SHOWN THEREON IN THE ORIGINAL GRADING THEREOF AND SWEAR THAT WE ARE THE SOLE OWNERS OF THE LAND ABOVE DESCRIBED AND THAT THE LAND COVERED BY THE STREETS, AVENUES, ALLEYS AND ROADS IS FREE FROM ALL ENCUMBRANCES INCLUDING TAXES.

IN WITNESS WHEREOF WE HAVE HERETO SET OUR HANDS THIS 13TH DAY OF MARCH, 1944.

EIVIND ANDERSON  
 ASLAUG ANDERSON

STATE OF WASHINGTON  
 COUNTY OF PIERCE - 55

ON THIS 13TH DAY OF MARCH 1944 PERSONALLY APPEARED BEFORE ME EIVIND ANDERSON AND ASLAUG ANDERSON, HIS WIFE, TO ME KNOWN TO BE THE PERSONS DESCRIBED IN AND WHO EXECUTED THE WITHIN AND FOREGOING INSTRUMENT AND ACKNOWLEDGED TO ME THAT THEY EXECUTED THE SAME AS THEIR FREE AND VOLUNTARY ACT AND DEED FOR THE USES AND PURPOSES THEREIN MENTIONED.

IN WITNESS WHEREOF I HAVE HERETO SET MY HAND AND AFFIXED MY OFFICIAL SEAL THE DAY AND YEAR FIRST ABOVE WRITTEN.

HENRY ARNOLD PETERSON NOTARY PUBLIC  
 STATE OF WASHINGTON  
 COMMISSION EXPIRES APR 21, 1947

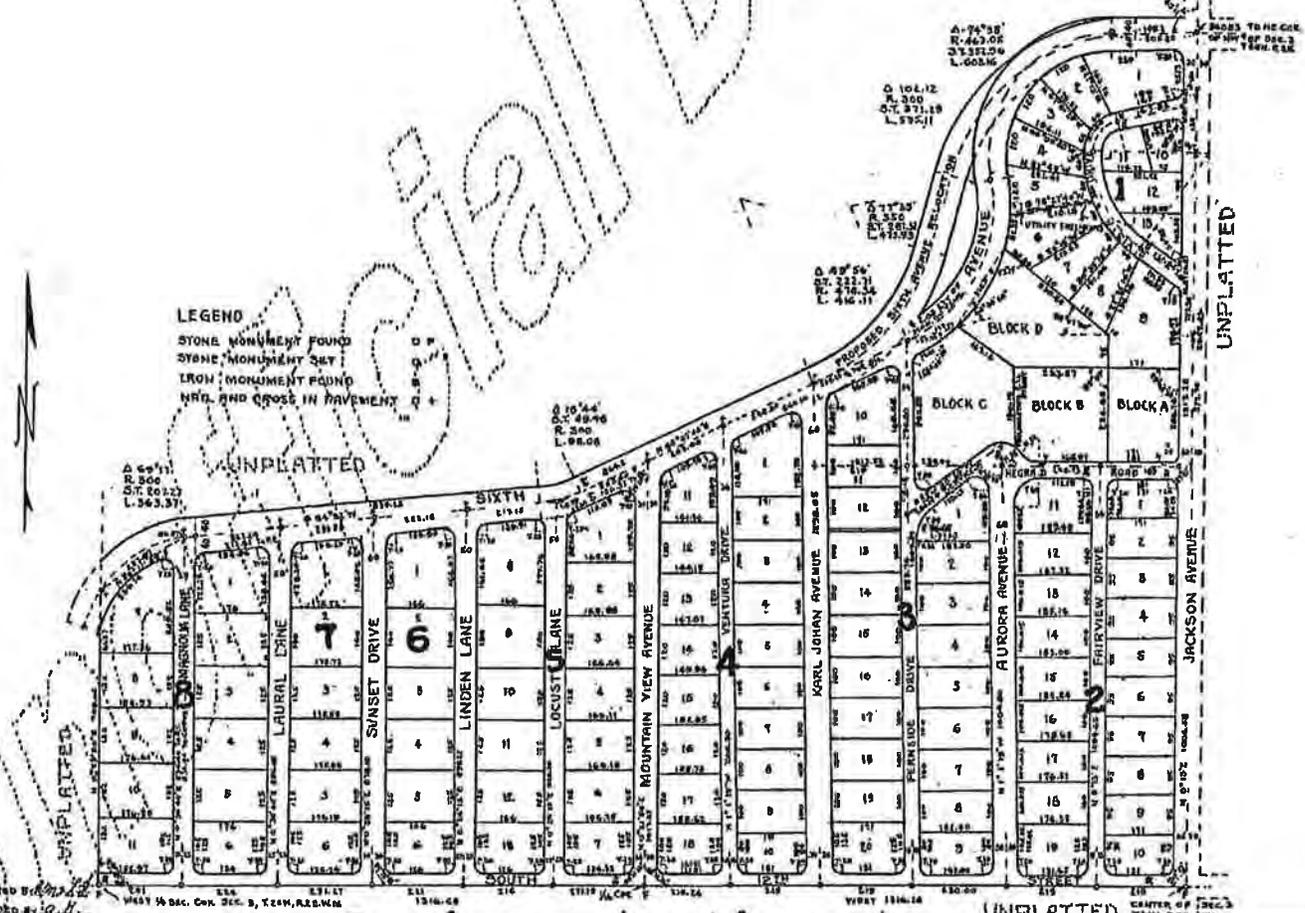
HENRY ARNOLD PETERSON  
 NOTARY PUBLIC IN AND FOR THE  
 STATE OF WASHINGTON, RESIDING  
 AT TACOMA, WASHINGTON.

TACOMA, WASH., MARCH 4, 1944

I HEREBY CERTIFY THAT I HAVE SURVEYED THE LAND HEREWITH DESCRIBED, THAT THIS MAP IS CORRECT AND THAT MONUMENTS HAVE BEEN PLACED AS SHOWN HEREON.

NO. 215  
 RENEWAL #352 D. H. WHITE  
 REGISTERED CIVIL ENGINEER.

D. H. WHITE, PROFESSIONAL ENGINEER  
 STATE OF WASHINGTON  
 REGISTERED



For reference only, not for re-sale.

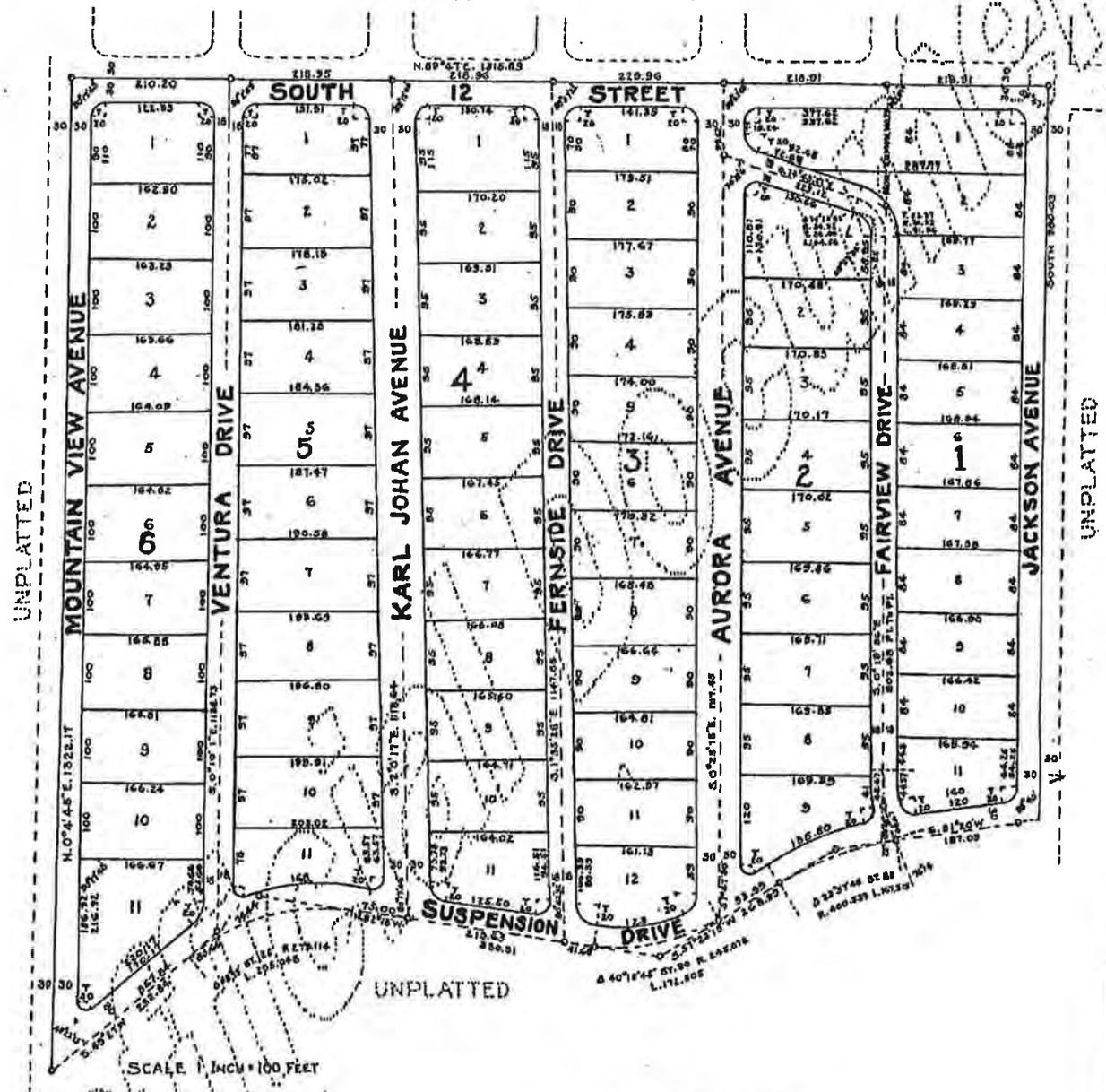
ATTACH 1'

7 Deck of land the Rest of Cor-  
by A.E. 2471.1.6

# NARROWMOOR

## SECOND ADDITION

### NARROWMOOR FIRST ADDITION



SHEET 1. OF 3 SHEETS

DECEMBER 9, 1946

I HEREBY CERTIFY THAT I HAVE SURVEYED THE LAND HERewith DESCRIBED, THAT THIS MAP IS CORRECT AND THAT MONUMENTS HAVE BEEN PLACED AT POINTS INDICATED BY SMALL CIRCLES (o)

D. H. WHITE

REGISTERED CIVIL ENGINEER AND LAND SURVEYOR.  
NO 219 RENEWAL E 659



COMPARED BY *H. J. + D. L.*  
INSPECTION BY *ad*

For reference only, not for re sale.

# NARROWMOOR

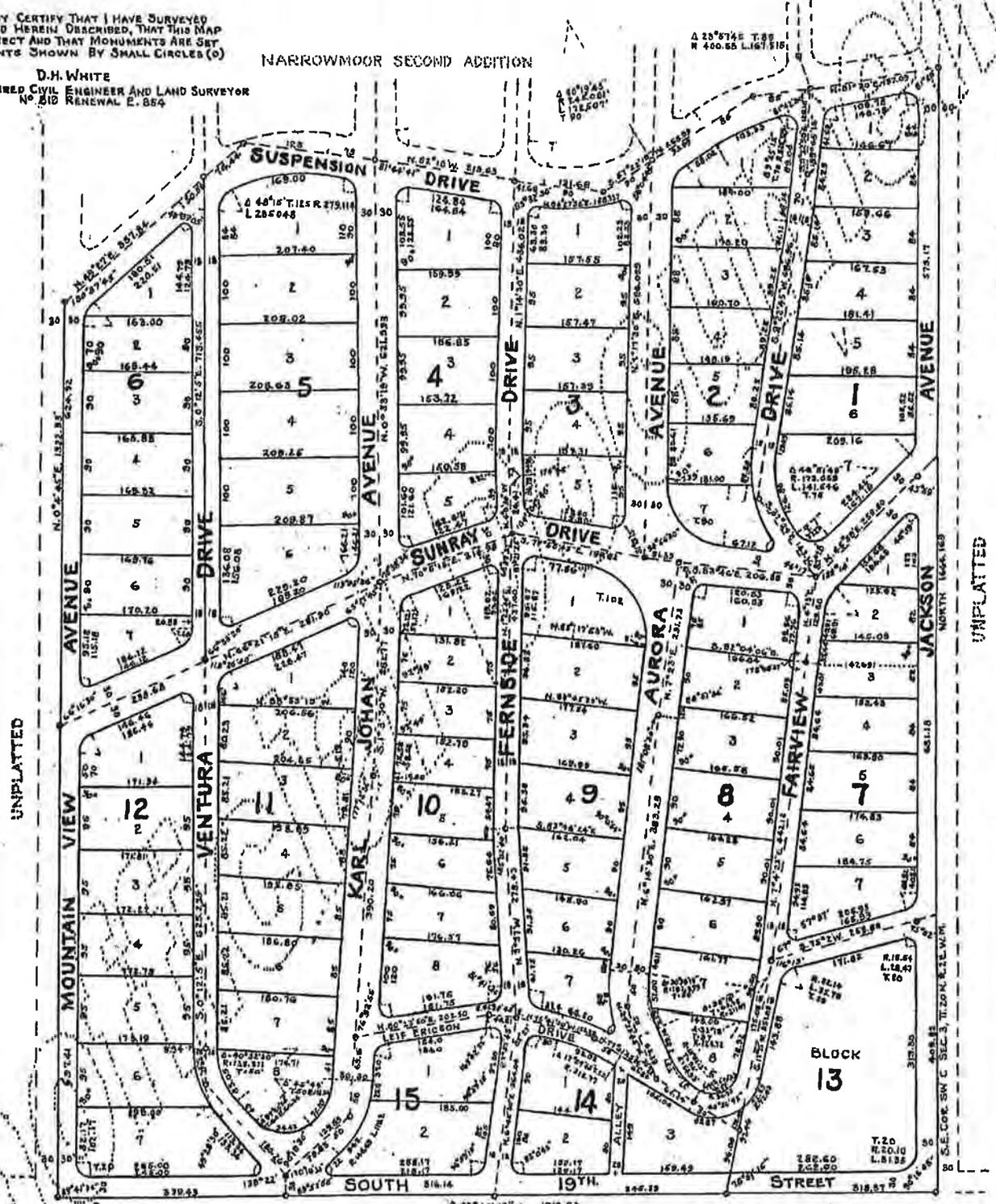
THIRD ADDITION  
SCALE - 1 INCH = 100 FEET

SHEET 1 OF 35 SHEETS

I HEREBY CERTIFY THAT I HAVE SURVEYED THE LAND HEREIN DESCRIBED, THAT THIS MAP IS CORRECT AND THAT MONUMENTS ARE SET AT POINTS SHOWN BY SMALL CIRCLES (O)

D.H. WHITE  
REGISTERED CIVIL ENGINEER AND LAND SURVEYOR  
NO. 618 RENEWAL E. 854

NARROWMOOR SECOND ADDITION



UNPLATTED

UNPLATTED

UNPLATTED

COMPILED BY J.H.L. V.K.  
DRAWN BY A.G.

For reference only, not for re-sale.

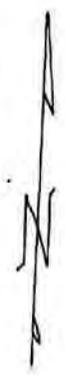
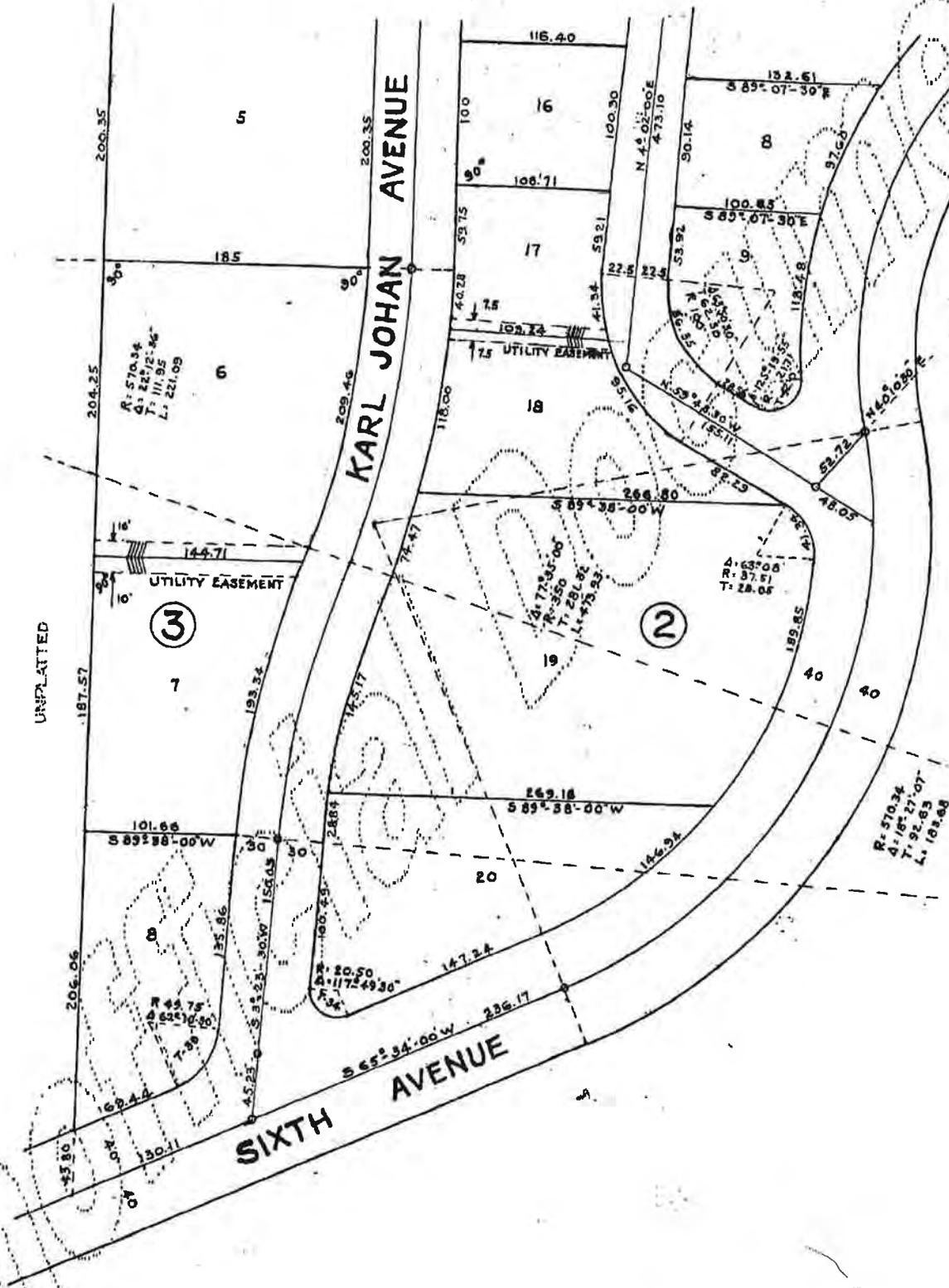


# NARROWMOOR

FOURTH ADDITION

SCALE 1 INCH = 50'

SHEET 3 OF 5



Compared - G.M. M. P.L.  
 Revised - A.P.

For reference only, not for re-sale

For reference only, not for re sale.

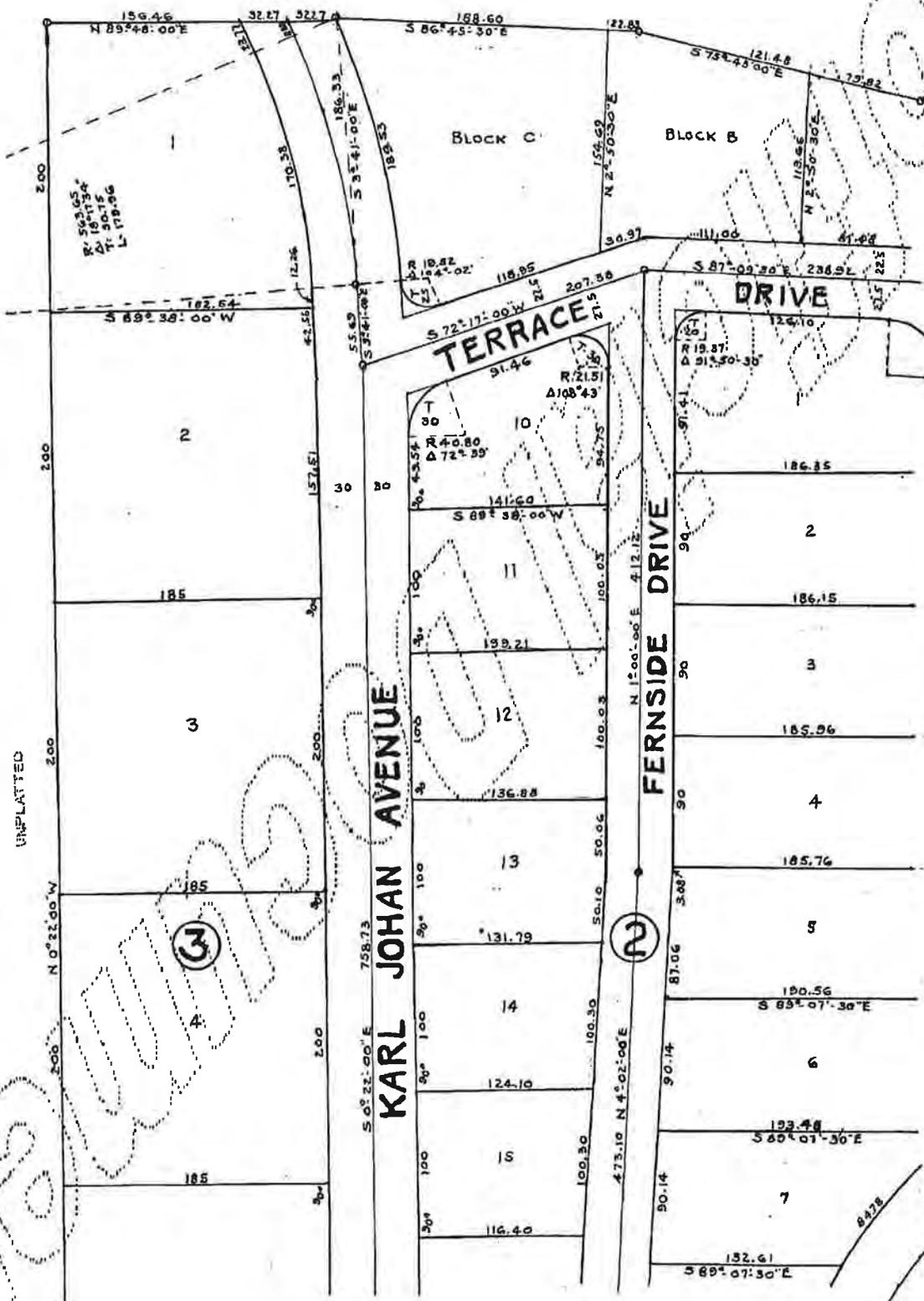
12A

# NARROWMOOR

## FOURTH ADDITION

SCALE 1 INCH = 50 FT. SHEET 4 OF 5

UNPLATTED



*Narrowmoor*

*Narrowmoor*

Example of "unsympathetic activity"



Non-compliant three level home constructed in 1990's towers over adjacent homes. Also, structure is sited on the lower portion of lot impacting neighbors' peripheral views.



ATTACH 2'

Example of "unsympathetic activity"



Constructed in 2000's, this "commercial" look is out of character in mid-century neighborhood. Also, building footprint is large relative to the lot; it's close to minimum setbacks on all 4 sides.



**Example of “unsympathetic activity”**



**The vertical architectural aspect of this home is untypical for the mid-century Narrowmoor neighborhood, where the norm is a horizontal aspect, designed to maximize views.**



### Example of “unsympathetic activity”



Recent construction in Narrowmoor where a large home includes an RV garage with upper deck. Note the contrast with one of the original Narrowmoor homes on the right.

Even though this imposing structure is within the 25' limit of the View Sensitive District, it is clearly out of place in the area and effectively destroys the marine view of the homes behind which it. A 20' limit would have substantially preserved the views for the upslope neighbors.



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West Slope Neighborhood Coalition  
P.O. Box 64321  
Tacoma, WA 98464



Would you favor a reduction in the height of structures allowed in our view sensitive district from 25 feet to 20 within the Narrowmoor Additions?

Yes \_\_\_\_\_ No \_\_\_\_\_

Note: All responses are kept anonymous.

Comment: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Please return no later than March 15!**



**TO:** Brian Boudet, Planning & Development Services Division Manager  
**FROM:** Joshua Diekmann, P.E. PTOE, Assistant Division Manager/City Traffic Engineer  
**SUBJECT:** Comprehensive Plan Amendments – Transportation Master Plan Amendments  
**DATE:** May 22, 2019

Public Works staff is requesting to amend the Transportation Master Plan (TMP) of the Comprehensive Plan. The TMP was adopted in November 2015 and provides a long-term vision for transportation infrastructure in the City of Tacoma. It is a primary tool for forecasting transportation demand and identifying services and improvements needed to achieve those goals and support the future land use vision of the City.

The main components of the document include balanced goals and policies that guide and direct the City to achieve the vision for continued growth and improvement of transportation facilities and services. It identifies priority corridors for all modes, including transit, streetcar, and high capacity transit routes. It also provides a means to measure performance and prioritize investments in order to achieve the Transportation Master Plan's vision.

The Transportation Commission, Bicycle & Pedestrian Technical Advisory Group, and city staff have been implementing the TMP and are proposing amendments to the TMP to address inconsistencies with other elements within the Comprehensive Plan, changing circumstances to growth and development patterns, changes in needs and desires of the community, and to enhance neighborhood livability. Additionally, the Dome District Business Association submitted a request to strengthen pedestrian priorities in the Downtown Regional Growth Center. Proposed amendments to the TMP will likely include general text clean-up, updating and/or adding policies, modifying priority networks and project list, updating performance measures, and incorporating the Tacoma Mall Subarea Plan.

Additional TMP amendments may include changes to support multimodal level of service, impact fees, or Vision Zero, a plan to eliminate traffic fatalities and serious injuries. The timing of these amendments will depend on the schedule and outcomes of those individual efforts, but one or more changes to address these future efforts may be proposed for the 2020 Comprehensive Plan Amendments. The Transportation Commission will review proposed amendments this fall in coordination with the Planning Commission.





**To:** Planning Commission  
**From:** Stephen Atkinson, Principal Planner  
**Subject:** **Future Land Use Map Implementation – Potential Rezones**  
**Meeting Date:** May 29, 2019  
**Memo Date:** May 23, 2019

**Action Requested:**

Review public testimony; Provide guidance relating to High Density Multifamily Designations and identify specific locations for further analysis and discussion on June 5, 2019.

**Discussion:**

Staff will facilitate a discussion around two primary topics: First, options and criteria for addressing public concerns relating to proposed High Density Multifamily rezones and second, identifying specific locations for an in depth review. In addition, staff will be requesting guidance on other evaluation criteria the Commission may want to use to inform modifications to the proposed area-wide rezones. These criteria could include connectivity criteria and special amenities or unique characteristics.

Topic 1: High Density Multifamily Designations. Based on the public concerns regarding the High Density Multifamily Designation, staff will facilitate a discussion of considerations and options to address these concerns and to develop a more refined approach for determining the applicability and appropriateness of this designation in the One Tacoma Plan.

**R-4 Considerations:**

- a) Greater potential for scale and massing impacts, such as views, shading, privacy, when situated adjacent to single family residential areas;
- b) Greater potential for density impacts, such as demand for services, parking, and traffic;
- c) The density allowance is more likely to support affordable housing incentives/requirements such as inclusionary zoning;
- d) The density and development performance of these areas is typically “under” the allowed densities and height;
- e) This zone is more likely to result in demolition of existing structures;
- f) Not all of the proposed R-4 zones are in areas supported by high frequency transit or other amenities;
- g) Most of these areas are already zoned for Low-density multifamily;
- h) The City’s mixed-use centers provide a sufficient supply of high density areas to support larger scale housing, whereas the zoning districts that support more missing middle housing are underutilized.

Topic 2: Specific Rezone Area Profiles. Staff will be seeking direction from the Commission on specific rezone locations for a deep dive discussion on June 5. Based on public comment and staff review, the following are specific locations that staff recommends as a starting point.

- a) Areas with the highest degree of public comment:
  - Stadium
  - Narrows
  - Dometop
  - 72<sup>nd</sup> and Alaska
  - 34<sup>th</sup> and Proctor
  - 26<sup>th</sup> and Alder
  - 6<sup>th</sup> Ave
- b) Areas with unique circumstances or specific Commission interest:
  - Norpoint
  - S 56<sup>th</sup> and M
  - Mt. Tahoma area
  - Portland Ave
  - S 19<sup>th</sup>
  - N Yakima

**Project Summary:**

The Future Land Use Map, Figure 2 of the One Tacoma Comprehensive Plan, illustrates the City's intended future land use pattern through the geographic distribution of residential and commercial areas, the designation of mixed-use and manufacturing/industrial centers, as well as shoreline and single-family detached designations. These designations correspond to specific zoning districts and use and development standards that implement the policies of the One Tacoma Plan.

Per the Washington State Growth Management Act and the Tacoma Municipal Code, the City's Land Use Regulations, including zoning districts, should be consistent with the policies of the One Tacoma Plan. However, in many areas throughout the City current zoning is inconsistent with the Land Use Designation in the Future Land Use Map. This project will seek to improve the consistency between the One Tacoma Plan and implementing zoning.

**Prior Actions:**

- 5/2/2018 – Reviewed draft scope of work for Future Land Use Map Implementation project.
- 6/4/2018 – Conducted a public hearing on the proposed scope of work for 2019 Amendments.
- 6/20/2018 – Approved an amended scope of work and recommended the work program to the City Council Infrastructure, Planning and Sustainability Committee.
- 9/5/2018 – The Commission reviewed background information on the City's growth targets, buildable lands capacity, and current permit trends.
- 9/19/2018 – The Commission reviewed an Options Analysis and provided direction to City staff on how to resolve the identified issues for the preparation of a preliminary rezone map.
- 12/16/2018 – The Commission provided guidance on addressing T-Transitional Zoning Districts within the preliminary rezone map. Staff recommended removing trust properties of the Puyallup Tribe of Indians from the review.

- 05/01/2019 – The Commission conducted a public hearing on the proposed Future Land Use map amendments and areawide rezones.

**Staff Contact:**

- Stephen Atkinson, Principal Planner, [satkinson@cityoftacoma.org](mailto:satkinson@cityoftacoma.org), (253) 591-5531.

**Attachments:**

- A. Comment Table: Comments from the Open Houses and Public Hearing organized by specific rezone location.
- B. Full Testimony from the Public Hearing
- C. Written Comments submitted by May 17, 2019

c: Peter Huffman, Director

# Public Hearing Testimony and Open House Comments Compiled by Specific Rezone Area

## Council District 1

Comment	Source	OH	Open House
<b>Skyline and Howard</b>		OT	Oral Testimony
Ms. Murray represents the homeowners in the Narrows rezone, which would go from an R2 to R4 in the proposal. She noted that this would displace 96 families in a well-established neighborhood. She believes this change would turn the neighborhood into a confused mix of housing, similar to others in Tacoma that she has driven through. Ms. Murray stated that she has done research through the city's websites and talked to planners, city leadership, and her state legislator, and has found that the rezone is essentially a completed process. Because of this, she feels that the	OT		
Ms. Jackman lives in the Narrows district. She stated that 12 years ago her block was approached with the same proposal to change zoning, but at that time there was an attorney living on the block who helped prevent that. She expressed concerns about parking and possible rising crime rates due to renters of multi-family housing. Ms. Jackman noted that she feels listened to but not heard. Tacoma could be the one to set an example that they care about what their citizens want. She expressed that we are not Seattle, and there are so many other areas that can accommodate	OT		
Follow Minneapolis' lead and eliminate single family zoning!	OH		
Make N 9th one-way East from N Skyline to N Mildred to facilitate traffic flow.	OH		
Please lower parking requirement in R4-L, never require 1 vehicle parking space per dwelling.	OH		
Need at least 2 parking spaces per family dwelling	OH		
Concerned about congestion, traffic, and parking!	OH		
<b>6th Ave</b>			
Parking concerns in neighborhood w/increased density! Any protection for longtime residents close to 6th Ave?	OH		
Require at least 1.5 parking per unit for R4-L	OH		
Eliminate single-family zoning, similar to Minneapolis	OH		
Allow more discounts for parking in X districts, esp. if they are on a busy bus line	OH		
What about access to emergency services & education? Need more schools, police, and fire as	OH		
Increase height of multi-unit – house into 8 stories	OH		
More dense development like 6th and Alder on Proctor	OH		
New R4L could be an appropriate location to incorporate more mixed use	OH		
Possible design to attract traffic to Jefferson Park	OH		
Please don't build ugly housing – don't put Mall housing here	OH		
Most houses in this area are already 4-plexes, or big old historic homes.	OH		
R-2 in the area that is currently C2 makes sense	OH		
Consider better bike access for the 6th Ave area	OH		
Keep sidewalks open during new construction	OH		
Less parking lots, more mixed use & preserving older homes	OH		
multiple family unites, how will parking be addressed? There already is limited parking for the existing homes. New higher density developments most NOT take parking from present day homes!	OH		
<b>Point Defiance/N Pearl</b>			
Don't tear down nice old houses If you must: Improve mass transit, Reasonable parking, Focus on	OH		
Allow higher build so more can have water view	OH		
<b>34th and Proctor</b>			
Recommending that the R2-VSD (R3-VSD) be rezoned community around referring to R3 – Keep R2-VSD Referring to R3-VSD – Keep R2-VSD Redraw boundaries to exclude the single-family homes Referring to R4L-VSD – Down-zone to R2-VSD Show as commercial, is it currently R-2?	OH		
34th & Proctor rezone – very frustrating organizational set up No one could hear at all Too many people who wanted to get info * people could not hear the city rep Separate classrooms for the individual topics would have been helpful Have the decisions already been made prior to these public meetings? Presenters should anticipate need for microphones for main presenters as well as small group city reps. Rezoning concerns – need for off-street parking if the area is rezoned for	OH		
services, parking, etc. I can barely drive to work because of the increased cars traveling limited streets!	OH		
Proctor & 34th – I think in creating the residential density at this location is a good idea. I live 2 blocks (1?) away. I understand that we need to accommodate more residents and this old commercial area is a good place to do it, given that the overall scale of the change would be	OH		

## Public Hearing Testimony and Open House Comments Compiled by Specific Rezone Area

<p>Mr. Simpson commented on the 34<sup>th</sup> and Proctor rezone. The area is slated as multi-use, but the existing commercial is different from 6<sup>th</sup> Ave or 38<sup>th</sup> street, it is in existing buildings than have been there for 50-100 years. He noted that in talking to planners, the tone is to bring things into alignment with the use, but he is cynical about that, and that he does not feel good about seeing R3 townhouses in a row versus the elegant old established neighborhood. Mr. Simpson also addressed the bus stop in the area, which is only for one route and is not very utilized. He stated that the rezoning is a concern because of what it could mean to the area. He noted that the good news is that it is not the high density that was put in at 26<sup>th</sup> and Proctor, but it could still open the</p>	OT
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# Public Hearing Testimony and Open House Comments Compiled by Specific Rezone Area

## Council District 2

Comment	Source
<b>N 26th and Alder</b>	
As homeowners on N. 27th and Alder, we are strongly in favor of zoning changes that would allow for greater density. Multifamily dwellings allow for housing more individual, which is greatly needed during the crisis of homelessness Thanks for this informative session The city should require that a percentage of new housing be affordable. The city should establish a fund to help displaces tenants and landlords who experience damage to their property during the newly established grace periods that tenants are now granted prior to evictions.	OH
Ms. Norton is a lifetime resident of the City of Tacoma, and began looking into this because she bought a house 10 years ago in the 26 <sup>th</sup> and Alder neighborhood. She is particularly concerned about the building that contains the Big Value Market. She noted that when she looks at the zoning map, she can't really make sense of it and does not understand why there are pockets here and there being rezoned. She also mentioned concern for the historic homes in Stadium District, stating that she does not want to see Tacoma tear down something beautiful in order to put up something mediocre. Ms. Norton stated that she actually likes some of the development in Proctor and Stadium districts, but would not like to see a historical home be torn down in order to do that.	OT
Concerns: Density exists already – no zone description covers this. Single homes with more than one “family”! Example: Married homeowners Plus adult children Plus their children Example: Finish basement rental Example: Finished Garage Rental Example: Bedroom Rental All of the above impact already limited parking. Neighborhood was built when maybe the family had one car. Incident: About a week ago, fire dept truck crawled down N25th to home on Junett for medical call. Did this delayed response have a negative outcome forresident? Reason – cars parked both sides, street too narrow for large vehicles. Neighborhood age means current development is tighter than current zoning standards No R4L!	OH
<b>Norpoint</b>	
Ms. Sheckler addressed the Norpoint area that is being up-zoned. Her concern is with the commercial area on 29 <sup>th</sup> and 59 <sup>th</sup> , as the area has a lot of accidents currently. She stated that traffic in that area is already bad with people cutting through to avoid the Fife curve. She also mentioned a residential area on 28 <sup>th</sup> Street NE which butts up against commercial zoning, she feels it would be a good area for up-zoning but it is being ignored.	OT
<b>Stadium</b>	
Mr. Powers is also concerned about the up-zoning near Stadium High School. He stated that the area subject to intense traffic and parking is difficult to find. He agrees that density and affordable housing is a great idea, but does not think that area warrants an up-zone at this time.	OT
Ms. Wenskill lives in the Stadium area. She stated that although her property would not be directly affected, it would potentially be affected when it comes to traffic and parking. She urged the commission to consider parking and design standards when considering development. She would not like to see our city become like Seattle with heavy traffic. Ms. Wenskill added that she agrees with a previous speaker, and would not like to see our city chopped up because it is great right now.	OT
Mr. Anderson lives in City Council district 2, and is generally in favor of the up-zoning proposed. He stated that we need to develop density on transit cooridoors, and that is the basic tenant of environmentally sound development. He mentioned specifically the Stadium District being transit friendly, with the light rail being expanded and bus stops, and should be up-zoned as such. Mr. Anderson would like to see diverse housing options to meet our diverse needs, including more duplexes, triplexes, and condominium options. He expressed that we need to develop different ways of developing to meet the serious environmental needs of the upcoming century.	OT
Ms. Bond is a resident of the Stadium District and expressed concern about the proposed rezone for that area. She also wanted to be on record saying that she is concerned with the fact that the Commissioner representing her area is not in here this evening or at several of the other meetings she has attended. She noted that the Stadium-Seminary Historical District is the oldest historic district in the state of Washington and is one of Tacoma’s earliest residential neighborhoods, but there has been a lot of intrusion since it was added to the register. Ms. Bond asked for down-zoning for three families, including her own, and for the Commission to reject the up-zoning proposal overall. She stated that the proposed amendment is in direct conflict with policies that are already in place within the city.	OT

OH      Open House  
OT      Oral Testimony

## Public Hearing Testimony and Open House Comments Compiled by Specific Rezone Area

<p>Mr. Savol's house is designated R2 and is not directly affected by the proposal, but the area across the street from his home is proposed to jump to R4. He and his wife oppose this for several reasons, one being the aesthetics. He also lives on a corner lot with an uncontrolled intersection and there are been no accidents during the 6 years he has lived there, and opposes the potential increase in traffic. Mr. Savol also noted that he lives in a historical area and does not like the idea of a brand new big building right next to historical homes.</p>	OT
<p>Lives in Stadium District, and would like there to be studies on the effect that high rise housing has on the environment and on sustainability is a historic area. She thinks it is unacceptable to propose high density housing in a historic neighborhood and that it will destroy the neighborhood and its quality. Stated that single home owners are being aggressively displaced in this neighborhood to allow the city to build high-rise multi-family buildings.</p>	OT
<p>We want to keep single-family zoning as is</p>	OH
<p>The noticing for this meeting was not enough. Will PC send out notices to more people?</p>	OH
<p>We see a lot of code violations in this area and this has created a lot of distrust for the City. This doesn't seem like internal consistency or code update.</p>	OH
<p>The existing zoning has supported a big increase in density which the department head and chief planner did not know about. I have gone to various properties and checked. The planning concepts ignore important values.</p>	OH
<p>YAY Density! This will be a great location for density</p>	OH
<p>Parking permits</p>	OH
<b>N Yakima</b>	
<p>Mr. Cisakowski spoke on the proposed rezone on North 12<sup>th</sup> and Yakima. He wanted to comment on the selection of areas to create diverse neighborhoods, noting that he lives at the top of North Slope and below him are almost all single family homes, but the only proposed rezones for the area are right by him near the top. It was mentioned in the criteria that these rezones should be by mixed-use centers and transit areas, but this area is not within a quarter mile of these. Mr. Cisakowski noted that it did say these criteria might part of a future development, but expressed that you can't know where those would be. He feels like there are a lot of other areas that would be able to better provide diversity and multi-family homes.</p>	OT
<p>Mr. Hixenbaugh explained that he and his partner moved to Tacoma from Chicago over a year ago. They specifically choose Tacoma over Seattle because of the neighborhood they live in in the Historic Slope. He noted that right now the sightlines are very nice and it is a calm quiet neighborhood. He is concerned that allowing multi-family will make the traffic problem even greater, especially with speeding and uncontrolled intersections.</p>	OT

## Public Hearing Testimony and Open House Comments Compiled by Specific Rezone Area

### Council District 3

Comment	Source
<b>S 19th</b>	
Mr. Bailey lives in the Central District and spoke about the proposed rezone at South 19 <sup>th</sup> and Proctor. He objects to the rezoning of only the northern part of this area, and stated that it does not consistent with the Comprehensive Plan, as this parcel is separated from arterials and there is a lack of access. He suggested this area is looked at as a modification to the planning designation and leave it zoned as R2.	OT
<b>S 12th</b>	
This area should be redeveloped like Proctor This development makes sense	OH
<b>6th Ave</b>	
Parking concerns in neighborhood w/increased density! Any protection for longtime residents close to 6th Ave?	OH
Require at least 1.5 parking per unit for R4-L	OH
Eliminate single-family zoning, similar to Minneapolis	OH
Allow more discounts for parking in X districts, esp. if they are on a busy bus line	OH
What about access to emergency services & education? Need more schools, police, and fire as density increases	OH
Increase height of multi-unit – house into 8 stories	OH
More dense development like 6th and Alder on Proctor	OH
New R4L could be an appropriate location to incorporate more mixed use	OH
Possible design to attract traffic to Jefferson Park	OH
Please don't build ugly housing – don't put Mall housing here	OH
Most houses in this area are already 4-plexes, or big old historic homes.	OH
R-2 in the area that is currently C2 makes sense	OH
Consider better bike access for the 6th Ave area	OH
Keep sidewalks open during new construction	OH
Less parking lots, more mixed use & preserving older homes	OH
Pertaining to 6th Ave Development: If single family dwellings can be replaced by higher density multiple family	OH

### Council District 4

Comment	Source	
<b>E L St and 29th</b>		
Ms. Malo noticed that as we look at the issue at hand there are prominent themes, one being are we planning for things? She agrees with the need to have affordable housing for all and with the concerns over historic buildings, but feels we are building without understanding the impacts. She is concerned with not having studies done before development and the impact that could have for example on traffic and the safety of children and pedestrians.	OT	
Mr. Malo grew up in Tacoma and bought his first home last May, in the Eastside’s Strawberry Hill neighborhood. He noted that the home’s value is tied to its views. Currently the areas around him are zoned to allow for a maximum height of 35 feet, but the proposed rezones would allow for multi-family homes up to 60 feet, blocking his views. He believes that the proposed changes to East L St. and East 29 <sup>th</sup> St will fundamentally change the neighborhood and negatively impact current and future property owners. He added that he does not feel these changes align with code, and urges the City not to change the zoning districts in that area.	OT	
On the east side of L there are cars parked on both sides of the street	OH	
Someone with money will come and buy land and leave a lot of problems	OH	
I would lose my view of R-4 is allowed	OH	
L Street 12°. You don’t want more density here. It will need to be _____. no place here to park with access. access along upper Park street is low	OH	
City should pay more attention to infrastructure in the Eastside – no stormwater infrastructure- I have a larger lot & pay more for stormwater even though I don’t have stormwater	OH	
Dometop Neighborhood Association would be interested in this.	OH	
Steepness of land makes it hard for it to support high density	OH	
Access – connected sidewalk system, connections to transit not the best	OH	
What is RCX? Another portion of the Overlooks are better for R-4 Overall R-4 is better	OH	
2808 EM St is not included in the proposal of R4 as Both side of 29th St between L & M Street. I would like to be included in R4	OH	
We don’t have view sensitive zones in the east side that’s only the north end.	OH	
L Street is the alternate route to Portland. No safe crosswalk for Rogers Park	OH	
Area under-developed already, why not improve roads etc. first So are reaches R4 level first? No save ped acces to Tacoma Dome	OH	
Thank you for your time effort Please do not change to the proposed zoning. We don’t have infrastructure We lack a supermarket. (Food desert) I don’t want to see the historic old city feel to be lost Please no R4/R5	OH	
Part of the “Overlook” new proposed zoning is lunacy. In particular the area around 29th and East K should not have its zoning designation changed. The area is very steep and there is no large are for parking. Because of the steepness of 29th Street there will be an increase of traffic accidents if the zoning is changed.	OH	

Public Hearing Testimony and Open House Comments Compiled by Specific Rezone Area

2808 E "M" St. is my property. Why is this parcel not in R4 projection? I want my property to be included in R4.		
<b>E. Wright Ave and E 34th</b>		
Many near misses Kids crossing 34th to Destiny	OH	
Thank you for your time effort Please do not change to the proposed zoning. We don't have infrastructure We lack a supermarket. (Food desert) I don't want to see the historic old city feel to be lost Please no R4/R5	OH	
Between McKinley & E. D Street Wright St is single family Residential currently the max height of buildings is 2 stories Allowing 65' high buildings is not appropriate for Wright st.	OH	
Wyatt street is a side street These will be 65' across from 35' Wright ST is a small residential street with single family houses, max 2 stories R-4 does not make sense here	OH	
R4 zoning allows too tall a building in the area, will likely cause property values to decline in current view property. Also roads would need substantial re-grade to allow for traffic	OH	
City call 34th St a secondary road and all roads in the area are too heavily traffied as they are currently structure. Also no stormwater infrastructure up hill to deal with runoff, so basically it's all problematic	OH	
34th Street is in bad shape, lots of potholes	OH	
R-4 Seems ok along 35th Not a great transition from single family There are some apts there already	OH	
<b>S. Wright and Ainsworth</b>		
My places 3303 S Ainsworth. We are happy to change the zoning from R2-R3. I have a big family and would to add one more unit, like a mother-inlaw		

Public Hearing Testimony and Open House Comments Compiled by Specific Rezone Area

Council District 5

Comment	Source
<b>72nd and Alaska</b>	
This is a good spot for high-density, multi-family. People can walk, bike & use transit for amenities (bw) Shopping, lake; R-4 would be good Apartments better	OH
6640 So. Alaska 'The Forest' is dying. Every summer it dries to tinder. We need access to bring in Fire truces to safeguard against a forest fire	OH
Leave us alone, no comm. Zoning, Kalal 70104, Alaska	OH
We fought Winco and that didn't help These are wetlands all around Don't change anything 72nd is so busy and the guy around the corner wants to put Chick-filet	OH
Would like to see high density R4 Tacoma needs more housing – high density	OH
We see a big need for multi family. We own Donkey Island – Property 6650 So Alaska	OH
The old nunnery was sold and these is going to residential development – low density New connector east/west is proposed (long term)	OH
Whatever you built on the existing empty lot behind Winco Grocery doe not impact Wapato Park as a while after the revamping of the park	OH
Would wish to see Alaska left to single family developing as it is now. I do not believe there is room for commercial traffic on 72nd and Alaska	OH
Highly recommend zoning at R-1, R-2 sing family Alaksa is too busy to add add'l traffic that apts/townhouses would add. Bus service not adequate to support apts.	OH
There are homeless people in the park There are people living permanently in the park Multi-family will bring more the same There is a lot of crim along Alaska street – bike stolen from backyard	OH
Obvious opportunity to connect to water in South Tacoma (Wapata Lake). Something bigger than R-3 – R-4 or R-4L Similar to Tacoma mall the lake is these More people can get to enjoy the lake - have some (word)	OH
S Alaska St 72nd – 56th Needs traffic study Rezone multi-family High occupancy 45' tall Zone – R4L	OH
Consider traffic Air Quality Shoreline Management act. Wetlands We were told we would be contacted on Alaska St before zoned commercial Consider having a future meeting where we can hear	OH
Property adjacent to Winco (6640 S. Alaska St) is between retirement/group home and commercial area and would be better served as multi-family us property to allow for denser residential use. Its near amenities that allow residents not to use cars/or need to use cars. Ammenties: Bus Line, Park for recreation; walk to shopping & restaurants More housing & less cars!	OH
6640 S Alaska St- wants property rezoned Hoping for apartments to be built south of property by developer Amenities nearby: Wapato Park, Tacoma South Shopping Center, Bus stops, Park & Ride, and Sounder train Schools, fire station, and police are in close proximity Concerns about traffic on Alaska and 72nd St In short, please allow us to rezone our property to either R4-L or R4.	OH

Public Hearing Testimony and Open House Comments Compiled by Specific Rezone Area

<p>A couple of years ago it was proposed to rezone Alaska St from S 72nd to the entrance to Winco. The planning commission and the City Council directed staff to meet w/homeowners prior to proposing rezoning again. That has not occurred and it is now proposed again. This is extremely disappointing. Staff should be held accountable</p>	<p>OH</p>
<p>Ms. Chambers Little is one of 11 heirs to the property at 6638/6640 S. Alaska St., which has been their single family home for over 68 years. However, it no longer benefits anyone as a single family residence. She requested a rezone to either R4 or R4L. She noted that many of the city planners may know that her family has been seeking this change since her mother passed in 2016, and requested that this change be made this year. She feels this change would benefit the entire neighborhood and future development.</p>	

## Summary of Public Testimony

May 1, 2019

### Public Hearing on Future Land Use Map Implementation

- Mary Chambers Little – Ms. Chambers Little is one of 11 heirs to the property at 6638/6640 S. Alaska St., which has been their single family home for over 68 years. However, it no longer benefits anyone as a single family residence. She requested a rezone to either R4 or R4L. She noted that many of the city planners may know that her family has been seeking this change since her mother passed in 2016, and requested that this change be made this year. She feels this change would benefit the entire neighborhood and future development.
- Rosalie McKinney – Ms. McKinney noted that she was not sure if she needed to be at the meeting, but she had looked at the map and could not make heads or tails of it. She was interested in finding out if there was anything in her neighborhood, near North 25<sup>th</sup> and Lawrence, that she needed to be concerned about.
- Nick Malo – Mr. Malo grew up in Tacoma and bought his first home last May, in the Eastside's Strawberry Hill neighborhood. He noted that the home's value is tied to its views. Currently the areas around him are zoned to allow for a maximum height of 35 feet, but the proposed rezones would allow for multi-family homes up to 60 feet, blocking his views. He believes that the proposed changes to East L St. and East 29<sup>th</sup> St will fundamentally change the neighborhood and negatively impact current and future property owners. He added that he does not feel these changes align with code, and urges the City not to change the zoning districts in that area.
- Tatyana – Lives in Stadium District, and would like there to be studies on the effect that high rise housing has on the environment and on sustainability in a historic area. She thinks it is unacceptable to propose high density housing in a historic neighborhood and that it will destroy the neighborhood and its quality. Stated that single home owners are being aggressively displaced in this neighborhood to allow the city to build high-rise multi-family buildings.
- Jason Hixenbaugh – Mr. Hixenbaugh explained that he and his partner moved to Tacoma from Chicago over a year ago. They specifically choose Tacoma over Seattle because of the neighborhood they live in in the Historic Slope. He noted that right now the sightlines are very nice and it is a calm quiet neighborhood. He is concerned that allowing multi-family will make the traffic problem even greater, especially with speeding and uncontrolled intersections.
- Martin Savol – Mr. Savol's house is designated R2 and is not directly affected by the proposal, but the area across the street from his home is proposed to jump to R4. He and his wife oppose this for several reasons, one being the aesthetics. He also lives on a corner lot with an uncontrolled intersection and there are been no accidents during the 6 years he has lived there, and opposes the potential increase in traffic. Mr. Savol also noted that he lives in a historical area and does not like the idea of a brand new big building right next to historical homes.
- Molly Nichols – Ms. Nichols is a Tacoma Outreach Coordinator with Futurewise and is also a renter who lives in the North End. She is here to support the proposed rezoned that make our zoning consistent with Tacoma's Comprehensive Plan. She stated that as our region grows we need policies for compact and connected neighborhoods to manage the growth and ensure equitable access. The proposed changes allow for diverse housing options to meet diverse housing needs. Ms. Nichols also noted that the proposed changes begin to address the effects of redlining. She stated that we need zoning to be modified to give developers incentive to build low-income housing which creates mixed-income areas in high-opportunity areas which benefits everyone.
- David Cisakowski – Mr. Cisakowski spoke on the proposed rezone on North 12<sup>th</sup> and Yakima. He wanted to comment on the selection of areas to create diverse neighborhoods, noting that he lives at the top of North Slope and below him are almost all single family homes, but the only proposed rezones for the area are right by him near the top. It was mentioned in the criteria that these rezones should be

by mixed-use centers and transit areas, but this area is not within a quarter mile of these. Mr. Cisakowski noted that it did say these criteria might part of a future development, but expressed that you can't know where those would be. He feels like there are a lot of other areas that would be able to better provide diversity and multi-family homes.

- Jim Merritt – Mr. Merritt is an architect and urban planner who has worked and volunteered with the City of Tacoma for 40 years. He believes the amendments are misguided on so many levels and are unrealistic, and the spot rezoning would be a disaster for the City of Tacoma and should be rejected by the Planning Commission. He questioned why the North End, with no community center, would be considered more desirable than other locations. Mr. Merritt explained that the Eastside and South End have significant strip development that is under-utilized. He cited Aurora Avenue in Seattle as an example of the wrong way to do development and stated that we are doing the same thing in our city. Mr. Merritt noted that duplexes and triplexes in single family residential can cause issues because of absentee owners, and in many studies an area that goes under 60% home ownership becomes a troubled area. He stated that we need to throw out these amendments and start with a vision of the city at a design level and not just a process level.
- Lew Simpson – Mr. Simpson commented on the 34<sup>th</sup> and Proctor rezone. The area is slated as multi-use, but the existing commercial is different from 6<sup>th</sup> Ave or 38<sup>th</sup> street, it is in existing buildings than have been there for 50-100 years. He noted that in talking to planners, the tone is to bring things into alignment with the use, but he is cynical about that, and that he does not feel good about seeing R3 townhouses in a row versus the elegant old established neighborhood. Mr. Simpson also addressed the bus stop in the area, which is only for one route and is not very utilized. He stated that the rezoning is a concern because of what it could mean to the area. He noted that the good news is that it is not the high density that was put in at 26<sup>th</sup> and Proctor, but it could still open the door to something that isn't appropriate.
- Paula Bond – Ms. Bond is a resident of the Stadium District and expressed concern about the proposed rezone for that area. She also wanted to be on record saying that she is concerned with the fact that the Commissioner representing her area is not in here this evening or at several of the other meetings she has attended. She noted that the Stadium-Seminary Historical District is the oldest historic district in the state of Washington and is one of Tacoma's earliest residential neighborhoods, but there has been a lot of intrusion since it was added to the register. Ms. Bond asked for down-zoning for three families, including her own, and for the Commission to reject the up-zoning proposal overall. She stated that the proposed amendment is in direct conflict with policies that are already in place within the city.
- Hope Murray – Ms. Murray represents the homeowners in the Narrows rezone, which would go from an R2 to R4 in the proposal. She noted that this would displace 96 families in a well-established neighborhood. She believes this change would turn the neighborhood into a confused mix of housing, similar to others in Tacoma that she has driven through. Ms. Murray stated that she has done research through the city's websites and talked to planners, city leadership, and her state legislator, and has found that the rezone is essentially a completed process. Because of this, she feels that the communities have not been heard and that this process lacks transparency.
- Joyce Jackman – Ms. Jackman lives in the Narrows district. She stated that 12 years ago her block was approached with the same proposal to change zoning, but at that time there was an attorney living on the block who helped prevent that. She expressed concerns about parking and possible rising crime rates due to renters of multi-family housing. Ms. Jackman noted that she feels listened to but not heard. Tacoma could be the one to set an example that they care about what their citizens want. She expressed that we are not Seattle, and there are so many other areas that can accommodate high rises and multi-family dwellings.
- Patrick McGoldrick – Mr. McGoldrick spoke about a property at South 12<sup>th</sup> and Pine. He owns the property and rents it out, currently it is a bicycle repair shop. He expressed that he would like for it to be left alone, and from what he can tell the neighborhood around it feels the same way.
- Carl Anderson – Mr. Anderson lives in City Council district 2, and is generally in favor of the up-zoning proposed. He stated that we need to develop density on transit corridors, and that is the basic tenant of environmentally sound development. He mentioned specifically the Stadium District being transit

friendly, with the light rail being expanded and bus stops, and should be up-zoned as such. Mr. Anderson would like to see diverse housing options to meet our diverse needs, including more duplexes, triplexes, and condominium options. He expressed that we need to develop different ways of developing to meet the serious environmental needs of the upcoming century.

- Ellen Norton – Ms. Norton is a lifetime resident of the City of Tacoma, and began looking into this because she bought a house 10 years ago in the 26<sup>th</sup> and Alder neighborhood. She is particularly concerned about the building that contains the Big Value Market. She noted that when she looks at the zoning map, she can't really make sense of it and does not understand why there are pockets here and there being rezoned. She also mentioned concern for the historic homes in Stadium District, stating that she does not want to see Tacoma tear down something beautiful in order to put up something mediocre. Ms. Norton stated that she actually likes some of the development in Proctor and Stadium districts, but would not like to see a historical home be torn down in order to do that.
- Debby Wenskill – Ms. Wenskill lives in the Stadium area. She stated that although her property would not be directly affected, it would potentially be affected when it comes to traffic and parking. She urged the commission to consider parking and design standards when considering development. She would not like to see our city become like Seattle with heavy traffic. Ms. Wenskill added that she agrees with a previous speaker, and would not like to see our city chopped up because it is great right now.
- Leslie Malo – Ms. Malo noticed that as we look at the issue at hand there are prominent themes, one being are we planning for things? She agrees with the need to have affordable housing for all and with the concerns over historic buildings, but feels we are building without understanding the impacts. She is concerned with not having studies done before development and the impact that could have for example on traffic and the safety of children and pedestrians.
- William Bailey – Mr. Bailey lives in the Central District and spoke about the proposed rezone at South 19<sup>th</sup> and Proctor. He objects to the rezoning of only the northern part of this area, and stated that it does not consistent with the Comprehensive Plan, as this parcel is separated from arterials and there is a lack of access. He suggested this area is looked at as a modification to the planning designation and leave it zoned as R2.
- Nadiya Sheckler – Ms. Sheckler addressed the Norpoint area that is being up-zoned. Her concern is with the commercial area on 29<sup>th</sup> and 59<sup>th</sup>, as the area has a lot of accidents currently. She stated that traffic in that area is already bad with people cutting through to avoid the Fife curve. She also mentioned a residential area on 28<sup>th</sup> Street NE which butts up against commercial zoning, she feels it would be a good area for up-zoning but it is being ignored.
- Dale Powers – Mr. Powers is also concerned about the up-zoning near Stadium High School. He stated that the area subject to intense traffic and parking is difficult to find. He agrees that density and affordable housing is a great idea, but does not think that area warrants an up-zone at this time.

**From:** [Kim Rogers](#)  
**To:** [Planning](#)  
**Cc:** [Ushka, Catherine](#)  
**Subject:** Affordable housing with a view??? Strawberry Hill rezoning  
**Date:** Tuesday, May 14, 2019 10:46:16 AM

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My name is Brent Rogers @ 1021 East 30th St. Tacoma WA 98404. I First want to state that I have received nothing personally on the rezoning and I'm curious why I had to find out from a neighbor? I feel like the city has not been straight forward with these efforts,,so, I am writing to you today with my opposition on the Rezoning on both sides on East 29 th st. When I purchased the property 15 yrs ago , which on my taxes it clearly states PARTIAL VIEW PLUS. I don't think that that meant looking at the back of a building!!

1. Personally when I've called 911 the police do not show up, and when I call dispatch to see if they are coming to the house across the street from me getting burglarized, they're defense is that they are sorry but they are extremely understaffed for the amount of crime taking place in the area. Will the city of Tacoma be hiring more police officers to patrol strawberry hill area due to the population increase that high-rise building accommodate?
2. The qualities of our neighborhood aren't congruent with the criteria for zoning: Access Roads are narrow and POORLY MAINTAINED, there is on street parking, not walkable to public due to limited side walks , quality of side walks are poor with hilly terrain. Not Walkable to public transportation. Where would the vehicles owned by tenants be located if you do not have unground parking?
3. Schools in area a have been shut down. Where will all the children residing at these multiple family homes be educated?
4. Approximately 50% of high density rezoning is happening in lower income communities like East and South Tacoma compared to North Tacoma.
5. Strawberry Hill and McKinley Park are historical neighbors dating back to 1900. Tearing down homes and building large apartments complexes will forever change this residential community and conflicts tragically with historical preservation efforts that unfortunately are also not equally distributed throughout Tacoma.
6. The city is marketing this change for more affordable housing and to meet housing demands. Affordable housing with a view????????????????

Thanks for your time, maybe some of my questions will be answered at the May 17th public hearing?

Brent Rogers  
1021 East 30th St.  
Tacoma, WA 98404  
[Brentrogers253@yahoo.com](mailto:Brentrogers253@yahoo.com)  
(253) 341-7727

**From:** [David Pettit](#)  
**To:** [Planning](#)  
**Cc:** [Linda Hart](#); [Andrew Eyres](#); [debbie cafazzo](#); [Alana Franklin](#); [Mark Schemmel](#); [Penny Douglas](#); [Cynthia Hackett](#); [Jeff Ruthford](#)  
**Subject:** ATTENTION: PLANNING COMMISSION RE: Proposed rezone at S. 56th and L st.  
**Date:** Wednesday, May 01, 2019 2:46:11 PM

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Greetings! I sit on the Board of Trustees for the Tahoma Unitarian Universalist Congregation located at S. 56th and L st. We own 3 lots on the NE corner; our building occupies the most southerly lot with the middle and north lots used for parking. Currently and historically the building lot (abutting 56th st.) is zoned C-2 with approximately half of the middle lot included. The other half of the middle lot and the North lot are zoned R-2.

Over the course of the past several weeks we have had several communications with the planning department (Steve Atkinson and Brian Boudet) regarding the proposed rezone of all three lots to R4-L. We understand the City's position — a desire to provide additional affordable housing within the City and, at the same time, provide a buffer between the R-2 neighborhood and the commercial enterprises fronting the arterial streets of that neighborhood. However, we do have concerns associated with the R4-L designation. Most notably, R4-L does not specifically allow religious facilities where the current C-2 does. We believe this could create potential problems should we wish to renovate, expand or sell the properties to another congregation in the future. Although not much has been undertaken to date, the City seems to be friendly and cooperative at the moment. This could change with future staff and the lack of an allowed use. Additionally, our property values will undoubtedly go lower given the common belief that commercial zones are more valuable than residential zones. Needless to say, that resale value is part of the formula we use in decision making for our future.

We would like to suggest a Transitional zone designation. The BOT sees this as an excellent compromise; the City gets the buffer it is looking for whether it remains church use or becomes low impact commercial. Should the market make it desirable for an R4-L type use the City could, and no doubt would, happily facilitate that use. The church gets more options and greater flexibility in creating a new environment for the congregation. And, because religious facilities are specifically allowed under the transitional designation, there would be less likelihood of issues should we or another congregation want to make improvements to the properties. Everyone wins...

In conclusion, on behalf of the BOT, I wish to thank you all for your time, energy and consideration on this matter. Unfortunately we are unable to have representative present at tonight's meeting. But we will be staying in touch and look forward to a resolution which is favorable to all parties.

Yours most sincerely

David Pettit  
Board of Trustees member  
Tahoma Unitarian Universalist Congregation

April 24, 2019  
to: Brian Boudet

Greetings Brian. I hope you enjoyed your time away from the office last week and you have returned renewed and recharged.

I sit on the Board of Trustees at Tahoma Unitarian Universalist Congregation located at S. 56th and L st. and, on behalf of the BOT, have some concerns regarding the impact of the proposed rezone of our property. I know you have spoken with Jim Tuttle, a member of our congregation, but Jim is not a member of the BOT and does not represent the BOT or the congregation. I did have a friendly chat with Steve Atkinson a couple weeks ago but since then he has been unable to return several phone calls and an email regarding follow-up questions. So I direct our thoughts to you with the hope you can address them in a more timely manner.

The size of our congregation is nearing a point where we will outgrow our current facilities and we are beginning to have conversations about what the next step for us might be. One option of course would be to find a new location and move the congregation. Another, although less likely, potential solution would be to expand the current building. Both of these choices would be affected by the proposed rezone. In the first scenario, the pool of potential buyers (of the current property) would be dramatically reduced by restricting the sale to residential users; thereby limiting our ability to sell in a reasonable time frame. In the either case, the base value of our property will undoubtedly be adversely impacted given the common belief that commercially zoned property (which half of it currently is) holds more value than residentially zoned property.

We also have some concerns about our ability to enlarge the current building under the residential designation. Again, this is an unlikely scenario, but because "religious facilities" are not specifically allowed under R4-L, we see potential to be denied this option. The current department staff seem willing to "work with us" possibly granting a conditional use or waiver but, as we have seen on the national level, government can go horribly astray very quickly. It is much more comforting to have a designation that clearly allows religious freedom. Being "Grandfathered in as is" is one thing but making any changes is something else. This same thought process applies to our two lots currently being used for parking; if we wanted to improve them, say by paving them, we could potentially be turned down because of a residential zone designation.

We are still curious about the "transitional" designation that is currently an option according to the Zoning Reference Guide published by the City. I got the impression from Steve that this zone was going away and his responses to inquires about it were a bit nebulous. It seems that this would make a good compromise for both the City of Tacoma and our congregation. This would allow us more flexibility in reaching potential buyers (including residential users), minimize the negative value impact, and facilitate possible improvements because religious uses are allowed in that designation. The City would gain the "buffer" effect it is looking for between residential and full-on commercial uses but not impede the possibility of residential use.

TUUC applauds Tacoma's goal of creating more affordable housing. The continued growth in south Puget Sound makes the city a central player for business and the families that support those businesses. Housing will be crucial in maintaining a respectable standard of living for everyone to enjoy. But this should be balanced with the interests of those that are established in the community and contributing to society as well. We look forward to your thoughts regarding this letter, your comments and your help in understanding the Planning

Department's train of thought on this issue. Please respond to this email address and I will forward it to the rest of the BOT members.

Yours most sincerely,

David Pettit

April 25, 21019  
from: Bian Boudet

Mr. Pettit,

Thanks for your e-mail. This is a complicated project that is city-wide in scale and reflects multiple broad community goals, while at the same time can be unique to various locations and is very important to individual property owners like the church. We very much appreciate your continued interest and involvement, as that is so critical to trying to get this as “right” as we can. And, as you can probably imagine, Steve is getting lots of inquiries and questions from all over the City and is making his best effort to respond as quickly as he can to all of them. I apologize if he hasn’t been able to get back to you yet. Here are my thoughts.

Clearly your site is a tricky one in that it sits at the transition point between two different areas (a small neighborhood commercial district) and the surrounding single-family neighborhood. On top of that, your current property is comprised of multiple parcels and is currently split in two different zoning districts (part of it is zoned commercial and part of it is zoned single-family residential). And on top of that, churches are a fairly unique use from a zoning perspective – in this location the church itself works pretty well as a transition use but at the same time a church is not commercial or residential and thus does not cleanly fit into any specific zoning category.

The Comprehensive Plan is trying to support appropriate transitions between higher intensity areas/zones and lower intensity areas/zones. Unfortunately, in your location, as in many other areas of the City, the current zoning does not provide any transition, as it switches immediately from the C-2 zone (a fairly intensive commercial zone) to the R-2 zone (a single-family zone). As we’ve discussed, this is why your site is being reviewed this year and why a zoning change is being contemplated.

In your location, the current Council-adopted Comprehensive Plan indicates that low density multi-family zoning would help provide a good transition. This is why the initial rezone concept suggests your property might be rezoned to the low density multi-family zone (R-4L). The proposal also recognizes that the current zoning splits your site, which is generally not good and is why the entire property is suggested for R-4L. If approved, that would effectively be a partial “downzone” and a partial “upzone” of your site, would provide a transition as called for in the Comprehensive Plan, and

would bring your property all under one zone (instead of being split).

While that proposal is consistent with the current Comprehensive Plan guidance for the area, I would agree that it is not the only potential option for meeting most/all of those objectives. You suggest that rezoning the entire site to T (Transitional) instead of R-4L (multi-family) might be a better option for the church that would still meet most of the objectives. While not using a multi-family zone as a transition, it would still be a zone that provides some level of transition between the C-2 zone and the R-2 zone and could bring the church's property under one zone (instead of being split). With regards to the T (Transitional) zone, that is a current zoning district and there is no specific plan or project to eliminate that district.

With all of that in mind, I think it is perfectly reasonable for the church to suggest that instead of being rezoned to R-4L (multi-family) that you think it more appropriate to be rezoned to T (Transitional); as that option, in the church's view still meets much of the Comprehensive Plan's goal (better zoning transition) while being more consistent with the church's goals and interests. My guess is that if the church makes that suggestion the Planning Commission (and Council) would strongly consider it.

Lastly, I want to make sure that it is clear where we are in the process and how you need to provide your input (whatever the church ultimately chooses that to be). The Planning Commission has issued this proposal for community input. They are currently taking public comments, which can be submitted to them in writing, or provided verbally at their upcoming public hearing on May 1, or both. I very much encourage the church to finalize your thoughts and provide those to the Commission as part of this process, as this is really with them at this point and they are the ones who will be making a recommendation to the City Council in the next couple of months.

Hope that helps.

**Brian Boudet, aicp**

Planning Division Manager

City of Tacoma, Washington

747 Market Street, Room 345

Tacoma, WA 98402



**From:** [David Pettit](#)  
**To:** [Planning](#)  
**Subject:** Attn: Steve Atkinson  
**Date:** Thursday, April 04, 2019 1:18:13 PM

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I want to take this opportunity to thank you again for your time and energy in meeting with me last Thursday the 28th of March. We discussed a number of scenarios regarding the re-zone of the Church property at S. 56th and L St. One of the options was to retain C-2 on the most southerly lot (the building lot) and the middle lot (currently *mostly* C-2) and go R4-L on the most northerly lot. The Board of Trustees has been discussing this and seems to be leaning in favor of this idea. One question that does come to mind is would that most northerly lot, zoned R4-L, be allowed to be paved and used as parking for a commercial endeavor on the other 2 lots?

As an example: A dental or medical office building is put in on the 56th St. lot and spills into the middle lot. Some of the paved parking would fall in the middle lot but most of it would be on the northerly lot. Would this be an allowed use if that northerly lot is R4-L?

Yours most sincerely,

David Pettit  
253.241.5797  
davidpettit34@Gmail.com

**From:** [Peter Kram](#)  
**To:** [Wung, Lihuang](#); [mcinnis15@gmail.com](mailto:mcinnis15@gmail.com)  
**Cc:** [Peter Kram](#)  
**Subject:** City of Tacoma North End Zoning revisions  
**Date:** Thursday, May 16, 2019 5:36:37 PM

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Gentlemen: Thank you for the opportunity to comment on proposed zoning change regulations in the Stadium-Annie Wright district. I reside in the District Tacoma Avenue North and have done so for 38 years. I renovated an historic homes in that neighborhood and continue to maintain and improve it.

Proposals to increase the density of this neighborhood are ill-conceived, not in the best interests of this intact, historic neighborhood nor are they in the best interests of the city of Tacoma. Changes to increase the density and already dense area or simply unwarranted. There unwarranted for number of reasons. First it will necessarily destroy or impact historic homes. These homes are regularly and consistently shown in the annual tour of historic homes, one of which recently occurred. These houses typically are on narrow lots, my own is located on a 25 foot wide lot. There simply is little or no room to add more units to these homes. Parking is limited and often abysmal. The traffic combination of Stadium High School, Annie Wright School, soon to have another high school on its campus, the increased density with 170 + apartments at North First and North "G" Street means traffic is frequently at a standstill. The notion that the coming light rail will solve all this is wishful thinking and not supported by any empirical evidence. There is apparently no study that shows where the current residents actually work and their commuting destinations.

At a planning meeting I attended a few months ago the planning staff identified the facts that this area sits on a hillside that has already fallen down on to Schuster Parkway because of the soil composition, effects of rain and the full load of houses above Schuster Parkway. That meeting also identified the area as one possibly subject to high tide and water depredations on the neighborhood. The current draft plan also has a dividing line that bisects a current single family residence on North "E" Street. Does that mean the owner now has a duplex and can rent half of it out? Your inconsistent and arbitrary line through a home makes no sense and appears contrary to your own goals. My neighbors' efforts to obtain an explanation of this irrational, useless division line have produced no answer. Drawing a line through an existing house is not actual planning.

It appears that the underlying reason for this change in an intact, stable neighborhood is to increase city revenue. If you are trying to increase density and revenue then come up to the Hilltop, actually walk around and you will see where increase density can and would be useful and efficient. My office is on the hill overlooking the city, there are numerous places that could be filled in or expanded. Furthermore, the point of light rail going up to Tacoma General and St. Joseph Hospitals is to bring workers to the employment centers. If that is the case why not make this area more dense?

The same arguments in favor of more density can be made for Tacoma south of 38<sup>th</sup> Street toward and beyond Tacoma Mall as well as McKinley Hill. Both of those areas provide access to I-5, the main transportation corridor, access to Ft. Lewis-McChord with its 30,000 employees and service men and women.

The purpose of urban planning is to improve the city, it is not to beggar one neighborhood in order to meet some unknown and undisclosed quota or urban planning pipe dream. Walk around these various neighborhoods, don't just drive through. The north end residents should have some say in this. I invite any questions or any rational explanations.

Very Truly yours,  
Peter Kram  
414 Tacoma Avenue North  
Tacoma, WA 98403

**From:** [phil ray](#)  
**To:** [Planning](#)  
**Subject:** Comment:  
**Date:** Friday, May 17, 2019 7:30:25 PM

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From: The Booklet

"Rainier National Park", "How to get there opens July 1st, 1917, Paradise Inn.

The last page in the booklet shows, "Places of Big Interest in the Great Northwest". Pages 1 through 16 includes Yellowstone as #1 through #16 being Crater Lake National Park. #5 is the City of Tacoma, which states " Located immediately on Puget Sound, a city of beautiful homes, and there are flowers everywhere, roses predominating, and there is a system of glorious parks..."

I myself have heard many times of how beautiful and interesting the Old North End homes are. The future land use implementations are focused on development and disregards our Tacoma heritage of beautiful homes.

The message I get is one of lowering the cost of housing by larger developments and in doing so compromises the quality of life in our neighborhoods which the Land Use Implementation plan does not address. The future will be at risk, and our beautiful homes might not be able to survive if huge 5 story apartment buildings are allowed where beautiful homes stand today.

Sincerely,  
Philip and Sandy Ray  
501 N. Tacoma Avenue  
Tacoma, Washington 98403

**From:** [Ron Malm](#)  
**To:** [Planning](#)  
**Subject:** DO NOT REZONE  
**Date:** Sunday, May 12, 2019 11:07:03 PM

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To start, these plans have been shown to increase criminal activity as well as invite trespassing and auto prowling. As the occupants arrive, the traffic of undesirable neighborhood transients who are mostly homeless and addiction sufferers, will begin to invade the space and property of the already occupying residents of the neighborhoods that are established residents and local district voters.

Below are some important ideas all considered in this new idea, that will suffer the overwhelming loss of property values and respectful neighborhood visitors have in common:

- a. Request: Do not rezone areas of East Tacoma to Multiple Family Unit High Density District (Specifically E. L St. and E. 29<sup>th</sup> St).
  - i. Qualities of area aren't reflective of comprehensive plan criteria: access roads are narrow and not maintained. On street parking. Not walk-able to public transportation, no parking, steep hills. Limited sidewalks, poor condition of current sidewalks.
  - ii. The View Sensitive District Overlay regulation is not consistently applied across Pierce County. I ask that you create internal consistency with the VSD.
  - iii. Blocking current homes of view and devaluing homes in area.
  - iv. This is mainly a residential area which would negatively impact historical neighborhood. Increase traffic and noise. Proposal to rezone to high density multiple family unit district conflict with efforts for historical preservation.
  - v. Disproportionate amount of rezoned areas are happening in low income areas (East and South Tacoma) compared to North Tacoma. More high density rezoning happening in East and South Tacoma. If housing is a need across all districts of Tacoma then high density rezoning should be implemented equally not disproportionately in select areas (lower income).
  - vi. Affordable housing can be achieved through home ownership no just through increasing rentals. In fact a fundamental way to accumulate wealth is through investing in real estate where expenses are fixed and you accumulate equity. Your plan incentive's renting which studies show long term only benefits the man on top of the totem pole.
  - vii. There are legitimate concerns for housing demands and addressing exponential growth of Tacoma. This plan addresses these issues ineffectively.

**From:** [G Davis](#)  
**To:** [Planning](#); [Atkinson, Stephen](#); [Ushka, Catherine](#)  
**Subject:** E L St & E 29th St proposed code amendment  
**Date:** Thursday, May 16, 2019 4:26:12 PM

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To all it may concern:

It has come to my attention the long term plan for land use codes includes an amendment to the northernmost 5 blocks of 29th and L Streets zoning code. As I understand the proposed amendment, the code would change from multi family low density to multi family high density.

I see several problems with that change.

If one compares the similar proposed amendments of street ends (Fawcett St, E St) you immediately see the difference in infrastructure and geography. Both Fawcett and E St are on the same plane as adjacent neighborhood area so no existing views would be blocked and both have far better street quality, sidewalks, street lighting, etc. The proposed L St change involves land on a hill, the streets are small, some dead end and all of relatively poor quality comparatively. Being on a hill, the proposed height of 65' would block all up hill neighbor's existing view not to mention inexorably change the character of the entire hill. The infrastructure of this area would have to be virtually remade at great cost and considerable inconvenience to the existing neighbors.

I suggest either the entire hill be made high density zoning or the existing zoning of multi family low density remain or best yet implement the view sensitive overlay to this area as well as the north Tacoma use of same.

It would behoove your planners to come to our hill to see the situation as it is. It couldn't be that they know they would so drastically cut the property values of 12- 15 homes at the least.

Thank you for your attention.

Grace Davis  
1207 E 30th St  
Tacoma, WA 98404

**From:** [Martin Reynoldson](#)  
**To:** [Planning](#)  
**Subject:** E L St and E 29th St  
**Date:** Thursday, May 16, 2019 6:47:30 PM

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Home owner up the hill from this project... there are other much better places to make these type of investments for Tacoma that will not effect the hard working home owners of our neighborhood... the thinking bigger is better is no good for any one but the folks that build and leave the mess for someone els to clean up... take the money out of our community and Go...here is how

1. Adding large apartments... multiple family.... with no room in the schools to support them... who do you think gets the bill on transportation, schools higher taxes to support these choices.... where is the ones that helped to make these decisions .. no where to be found...

2. This is a calm peaceful neighborhood... was the reason we bought here... one would hope I will be able to keep the investment in this peaceful neighborhood... instead of Value Decreeing as it will with this project...

3. Disappointed with having to deal with folks that where commissioned with keeping the neighborhoods safe from this type of over sized mess... and call it progress... bet it's not your neighborhood

If you should decide to move forwards with this, things to consider... building single single family Dwellings instead... or...

1. Dead end the Road at 30th and K St. try and mid agate excessive traffic before construction begins...

2. Compensation for all the extra taxes that will have to be paid:

- A. School support
- B. Fire support
- C. Police support
- D. Water, sewer, ground water, support
- E. Road support ... for busses, fire support and traffic

3. Compensation for Loss of Value of our homes in our Neighborhood and for all the in convenience of a project of this size in a Neighborhood...

Not Sure how one in your position is actually entertaining this here...

Sent from my iPad

**From:** Debbie Labrie  
**To:** [Planning](#)  
**Subject:** East L st & 29th st  
**Date:** Thursday, May 16, 2019 5:16:28 PM

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To Whom it my concern,

I'm writing again because of concerns about your neighborhood... we as home owners , how are we going to get compensated, trucks in an out , construction, noise, dirt , dust.. an here is a big one... these buildings go up an the value of our homes go down.. for what, adding more buildings, more people that this neighborhood can't support, more vehicles, noise, traffic... your talking anywhere from 50 to possible 200 cars driving by my house all day and night . I don't have a driveway an my car is on the street. So now I have to worry about more traffic going by my car an chances of it getting hit.. are you willing to a driveway in... what about schools, can are neighborhood schools handle more children , over loading teachers...are you going to have more patrols... we lived here for over 30 years... I think we all need to be compensated for all the headache . If you can't help the existing homes then please stop all plans.... I would rather you leave us be so we can enjoy our quiet neighborhood an our beautiful views.

Sincerely  
Deborah Labrie

Sent from my iPad

**From:** [Daisy](#)  
**To:** [Planning; Ushka, Catherine](#)  
**Subject:** Eastside development, rezoning  
**Date:** Sunday, May 12, 2019 6:38:00 PM

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Hello,

As a concerned resident (that would be directly affected- East L ST), my husband and I are against the proposal of rezoning and adding multi-family high density on my street. As a native Tacoma resident, I have seen many changes over the last 30 years and this does not seem reasonable to me. All proposed area are VIEW property which I HIGHLY doubt would be rented to lower income families. This all seems fishy as developers only care about MONEY and not the community its invading. I have worked really hard to own a home in this increasing difficult market and would hate to lose my view or property value. We do not need more traffic, people or new buildings. As the rest of Tacoma has gotten their chance to shine and get cleaned up, Eastside has not. We got stuck with the homeless camp (which was only suppose to be 6 months- now going on two years!), poorly maintained roads, schools, sidewalks and parks. Why not place these high density housing zones in Proctor/north Tacoma or West End? Eastside and South Tacoma have been getting the short end of the stick (for decades) and frankly we are tired of it and hope that these things are considered. I appreciate your time.

Thank you,  
Daisy Rodriguez

Sent from [Mail](#) for Windows 10

May 15, 2019  
Planning Commission  
City Of Tacoma  
747 Market Street, Room 349  
Tacoma WA. 98402

Dear Sir,

My name is Delores Anderson and I'm writing to you today to discuss the property rezoning ordinance through the "2019 Amendment" which rezones parts of Pierce County for affordable housing and multi-family properties. The specific properties dedicated in rezoning are between East L street and East 29<sup>th</sup>. There are 24 home owners that have view properties in the Strawberry Hill area of East Tacoma, my house has a perfect view of the city of Tacoma. From my back deck, I can see The Puyallup River, the cascade mountain range, the Port of Tacoma, Browns Point, a portion of Vashon Island, the Commencement Bay, the Union Station, which is now the 9<sup>th</sup> District house, and upper Tacoma, and I can see the Saint Joseph's hospital.

Our view property has been in our family for four generations, I have resided at 1011 East 30<sup>th</sup> Street for 54 years, and wish to deed the house to my granddaughter upon my passing, making this a 5-generation-owned house. My life partner of 38 years and I found an opportunity to purchase a duplex at 1017 and 1019 East 30<sup>th</sup> Street, in 2013. The main deciding factor to purchase this property was the view from both duplexes. The view is similar to the view in our house. We had other opportunities to purchase other duplexes in the same area, and chose this because of the view.

The current rezoning limitations will limit the buildings in R-4 zones to 60 feet in height. This will block 24 homeowner's views on Strawberry Hill, East "L" street and Mckinley Avenue. The zoning restrictions will inhibit homeowners from their view property and substantially depreciate each home affected. I am requesting that the city of Tacoma planning commission hear The East Tacoma citizen's voices before initiating the R-4 zoning in East Tacoma.

We're requesting that the height limit be limited to 30 feet in height in areas that will obstruct homeowner's views and substantially depreciate homes in the area.

Our family has seen the changes in Tacoma's Eastside neighborhood from the 1930's, and my family and I have experienced the changes since 1981. Still, there are no buses that run on East "L" Street, there are no sidewalks on that street either. There are no elementary, middle school or high school in this area in walking distance, so students must use the school/city bus, or be transported by family members or walk. The area of Upper Park Road and Old McKinley Park have condoms, injection needles, broken crack pipes and broken alcohol bottles on the street where I walk my dogs. The sidewalks are not maintained by the city, and is barely walkable. There is suspicious activity coming and going to the 8-plex on Upper Park Road. Many of the city sewer connections are concrete or terra cotta from the 1930's and earlier. Many of our streets on East 29th and L street do not have sidewalks. None of the roads in our neighborhood are sanded during the winter months, but many in North Tacoma are. Our nearest grocery store is 4 miles away.

The East Tacoma neighborhood has received very little support with these issues in the past 2 decades. We understand that bringing in townhomes, condominiums and affordable housing will increase the property values in an area, which raises the tax base. We understand that schools receive funding based on their local zip code's taxes, and to have a better community, we need higher value homes, we're merely requesting that the infrastructure be in place before building any of these properties. The city of

Tacoma has Roger's Elementary School near East "L" street, which has been vacant since the 1990's. The McKinley Elementary School, which is being utilized as the Mary Lion Elementary School is a building in need of repair or demolishing, and Gault Middle School is vacant as well. There is a park across the street from Gault Middle School that is vacant and not in use. There are plenty of vacant pieces of land, owned by the city, that could be sold too. The purchase of these properties by private contractors and land developers will infuse the school district with much needed revenue. We're asking the city of Tacoma Planning Commission to conduct an analysis of these properties in the area before allowing 60 foot buildings smack dab in the middle of our view.

Our community is trapped in a grid lock every time the Tacoma Dome has an event. East "D" Street is clogged with 200 vehicles trailing from highway 705 through the Tacoma Dome parking lot. East "L" Street bridge over I-5 is deconstructed right now, so the only way residents can access their homes is to go clear to Pacific Avenue and East on 34<sup>th</sup> Street, or down to Portland Avenue, across I-5 Interchange traffic, and up to 38<sup>th</sup> street, over to McKinley Avenue, and down to their homes. We're asking the City of Tacoma Planning Commission to conduct an analysis of traffic considerations before allowing buildings to go in.

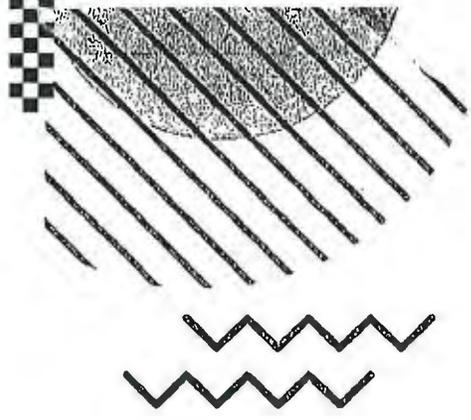
Many of the "Affordable Housing" multi-plexes on Upper Park Road, McKinley Avenue, and West to Pacific Avenue have "Partial View" rental units, which rent between \$1800- \$2300 per month. Is the term "affordable" specifically defined?

Your proposal also says affordable housing. The rent for these units will rent for \$1800.00 to \$2500.00 per month do to the location and view. This money only helps the owners of the apartment complexes it does not bring any money into our community.

On a personal note I have lived in my house, 1011 East 30th Street for 54 years. I have been blessed to enjoy the many transitions this neighborhood has gone through. My intent with this house is to leave to my granddaughter when I pass which will make for the Fifth generation of my family to live in this home. My father rebuilt this home. I inherited the home when he passed away. My husband and I have struggled in 38 years to keep our house. We have bought a second property on our street as an investment and to use the rent to subsidize our retirement income. One of the main reasons we invested here was due to the zoning, and be able to keep the view property for our tenants. We have built specific items to accent our property which reflect the view we have of the Tacoma Dome. Our properties have awesome views and your proposal will block our views in their entirety and diminish the quality of our neighborhood.

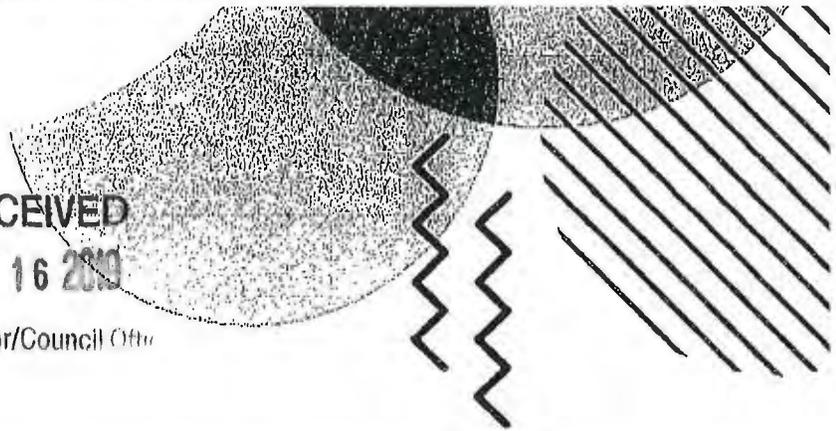
Sincerely,

Delores Anderson  
Community member and proud Citizen of East Tacoma  
1011 East 30<sup>th</sup> Street  
Tacoma, WA 98404  
(253)279-1977



RECEIVED  
MAY 16 2019

The Mayor/Council Office



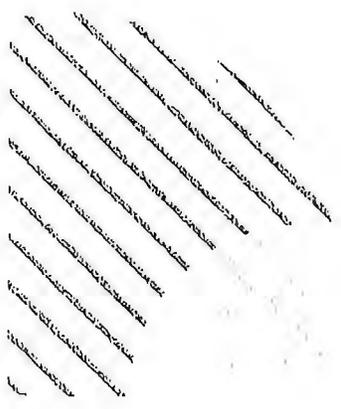
FAX

Date: 5-16-19  
From: D'Ann A  
Phone: 253.279.1977  
Fax: 253.300.8980

To: Council member C. Ushka  
Phone:  
Fax: 253-591-5123

Comments: Concerns about rezoning  
of East 2 + East 29  
Strawberry Hill

This facsimile contains confidential information that may also be medically or legally privileged and which is intended only for use of the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any dissemination or copying of this facsimile is strictly prohibited. If you received this fax in error, please notify sender by telephone at 253.279.1977.



May 15, 2019  
Planning Commission  
City Of Tacoma  
747 Market Street, Room 349  
Tacoma WA. 98402

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Sincerely,

Delores Anderson  
Community member and proud Citizen of East Tacoma  
1011 East 30<sup>th</sup> Street  
Tacoma, WA 98404  
(253)279-1977

**RECEIVED****MAY 17 2019**

The Mayor/Council Office

**MICHAEL LIND LAW OFFICE**

3124 E. Valleyview Terrace

Tacoma, WA 98404

Ph. 253.224.7590

Fx. 253.627.4087

e-mail: Michael\_Lind\_911@msn.com

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May 17, 2019

City of Tacoma  
Planning Commission  
Attn: Ms. Catherine Ushka  
747 Market Street, Room 349  
Tacoma, WA 98402

Fx: 253.591.5123

SUBJ: Proposed Rezoning: R-4 Multi-family Housing for E L St & E 29<sup>th</sup> St.

Dear Ms. Ushka:

My name is Michael Lind and I am writing to you because I disagree with your proposed zoning district: R-4 multi-family (high density) housing for E L St & E 29<sup>th</sup> St. My first and main point of contention is that View Sensitive Overlay is not being applied to East Tacoma. How is it that if North Tacoma has View Sensitive District Overlay, yet East Tacoma, still part of the city of Tacoma, it doesn't apply? There should not be any development allowed to exceed 25 feet in height to protect homeowners' property value.

Second, at no point did I receive notice of this proposal. Why should I have been provided notice of this proposal? Because this proposal directly impacts my view and decreases my property value. Notice was not placed in the planned location for residents to be made aware of the proposal. Notice was not sent to each resident that this planned development would impact.

Third, you intend to build multi-family housing in an area that devalues the property of nearly all the families that live in the neighborhood. This "Class" of people have collective rights against the government devaluing their property. Are you telling me that there is no other location for this project? If your answer is no, then it becomes very clear that this is more about a developer wanting to build water view properties at the expense of those who already have the view. On February 23, 2017 Candice Ruud quoted you in her article, "Tacoma School Board president will run for City Council on the East Side":

SUBJ: Proposed Rezoning: R-4 Multi-family Housing for E L St & E 29<sup>th</sup> St.  
DATE: May 17, 2019  
PAGE: Two

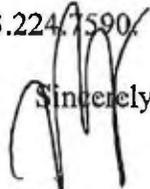
"We deserve safe neighborhoods, career-level jobs, and a high quality of life in Tacoma's East Side and South End," Ushka said in a news release announcing her candidacy. "I have proven my ability to lead collaboratively and get results as a director of Tacoma's public schools and I am running to bring that innovation to Tacoma city hall."

This proposal is your idea of safe neighborhoods and high quality of life? This is how you lead? You aren't bringing the high quality of life to the current residents of East Tacoma, you're bringing it to the potential wealthy buyers who like yourself, said "No, there is no other place for this development." You don't represent me. I'm pretty sure that the property values will decline for the many already here to the extent that the few who benefit from your project will not be able to make up for the loss in revenue. That does not increase the quality of life. For anyone.

Lastly, my wife and I have chosen to live in this neighborhood for 18 years because of the view. We have spent over \$100,00.00 upgrading our home and property because we decided early on that this house would be our last home we would ever own. Now, you intend to take that away from us. Not just us, but from the "Class" of us homeowners that enjoy the water view. I can't think of a worse way to manage growth for the City of Tacoma and its residents. In case you didn't know this, but from a business standpoint, you should not try to erode your tax base and decrease home values from the many for the potential few who don't even exist.

Thank you. I can be reached at 253.224.7590.

Sincerely,



Michael S. Lind  
Attorney at Law

**From:** [Bill & Marilyn](#)  
**To:** [Atkinson, Stephen](#)  
**Subject:** Comments on Future Land Use Implementation Proposal, S 19th and Proctor  
**Date:** Wednesday, March 27, 2019 5:42:25 PM

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March 27, 2019

To: Steve Atkinson

From: Willian Bailey

Re: Future Land Use Implementation Proposal, NW Corner South 19<sup>th</sup> and Proctor

Thank you for the recent open house regarding the land use proposals in Council District 3. As I expressed, I am concerned with the proposal to rezone property at the NW corner of South 19<sup>th</sup> and Proctor Streets. The southerly portion is fully developed with Park Rose Retirement Community/Nursing Home. This facility was constructed 40± years ago under a special/conditional use permit. I have no problem if the Planning Commission determines the R-3 or R-4L Zoning is appropriate on this already-developed portion. Certainly, the scale of the development is appropriate with multi-family zoning. Their access is via a single driveway to South 19<sup>th</sup> Street with no traffic impacts to the neighborhood to the north, where I have lived for 44+ years.

I am concerned with the proposal as it pertains to the vacant northerly portion of the proposal. This portion appears to be comprised of Parcel 0220014029. This parcel is 1.3± acres in size, L-shaped, with frontage (i. e. access) on two substandard streets, South Madison Street to the east and South Monroe Street to the west. Both streets are residential access streets serving a long-standing neighborhood to the north. Both streets dead-end before reaching South 19<sup>th</sup> Street, leaving all access for the property through this neighborhood. The vacant parcel would be able to contain 10-12 single-family dwellings under the existing R-2 Zoning. Rezone to R-3 would approximately double the number of dwellings that could be developed on the property and R-4L could result in up to 40-45 units. There does not appear to be any feasible way to obtain access to South 19<sup>th</sup> Street, the nearest arterial street.

To summarize, the following are my objections to the rezone of Parcel 0220014029:

1. The rezone is inconsistent with the Comprehensive Plan and Land Use Regulations.  
The parcel neither abuts nor has access to South 19<sup>th</sup> Street or any other arterial. The introductory section of the low-density residential zoning regulations indicates these zoning districts are appropriate along arterials (presumably with direct access to said arterials).
2. The undeveloped parcel has inadequate access.  
The parcel has 165 feet of frontage on South Madison Street. Madison is a residential street with a failing oil-mat surface, no curbs or sidewalks in the dead-end section. This street dead ends about 50 feet south at the north property line of the retirement home; a proper turn-around has never been developed and it is not clear if enough right of way exists for a cul-de-sac or “T” turn-around. South Monroe street abuts the parcel on a portion of the west property line. Although it shows up on the parcel maps, it is undeveloped in any sense of the word. The surface vegetation from South 17<sup>th</sup> to the parcel was removed in the last year, and several inches of mulch has been deposited.

I would recommend that the land use designation be lowered to match the zoning rather than

raise the zoning to match the land use designation.

Sincerely,

William Bailey  
1515 S Madison St  
Tacoma WA 98405

March 27, 2019

To: Steve Atkinson

From: William Bailey

Re: Future Land Use Implementation Proposal, NW Corner South 19<sup>th</sup> and Proctor

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Sincerely,

William Bailey  
1515 S Madison St  
Tacoma WA 98405



s 19th and Proctor

Show search results for s 19th ...

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Layout:

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Format:

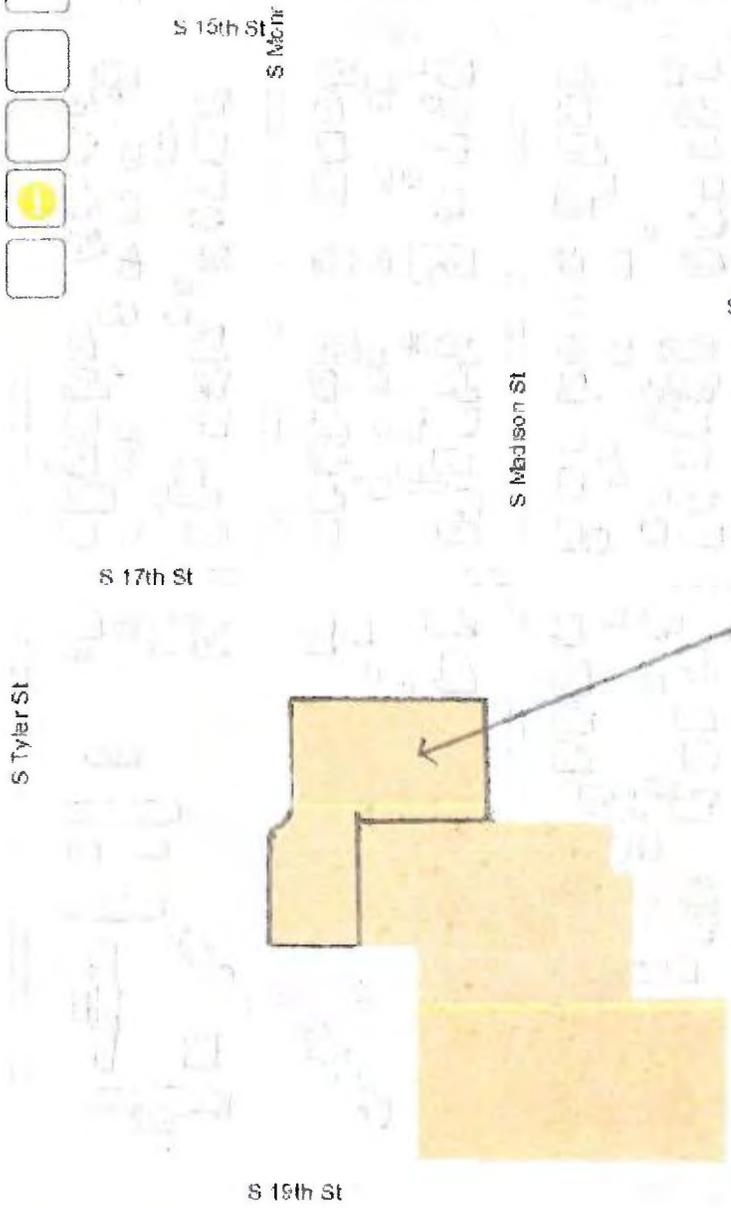
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Parcel # 0220014029

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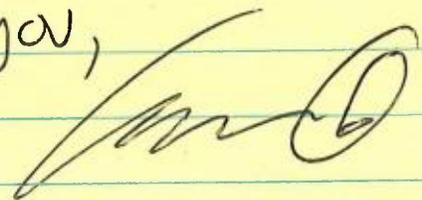
05/10/2011

Dear City of Island Planning Committee,  
My name is Aaron Beckord,  
I live at 3007 East K Street  
on Strawberry Hill. I also own  
3002 Valley View Terrace.

There is a proposal to re-zone  
East 29th Street. Please don't  
do this. Strawberry Hill is  
one of the best neighborhoods  
in the world, there is almost no  
turnover here. Not a single house  
is for sale today, only 2 or 3  
sell each year. Re zoning will  
change the character of our neighborhood  
and will block my views &  
most of the neighbors.

I would be happy to take  
a walk around the proposed  
re-zone area & my properties  
so we can see what the  
effects will be.

Thank you,



AARON BECKORD  
(206) 300-7690  
aaronbeckord@hotmail.com

**From:** [Lani Beug](#)  
**To:** [Planning](#)  
**Subject:** Rezoning of the Stadium District in Tacoma  
**Date:** Saturday, May 4, 2019 6:00:58 AM

---

To Tacoma City Council,

As a twenty seven year resident of North Yakima, it sickens me to look at your zoning proposal that will allow high density apartments in this historic portion of Tacoma. Yes, I understand the need for more affordable housing, but when you tear down historic districts in a city and make them look generic, what have you gained? Just another soulless city. Tacoma has beautiful architecture and when our city thrives to preserve it, it gives character and uniqueness to our community. Find derelict areas and rezone them. Bring them up to help our city thrive and grow. Please don't destroy our beautiful, older neighborhoods where there is a pride in ownership. You, on our city council have been elected to protect our city and also to think of our best interests as a community. Ask yourself, is it really in the best interest to destroy our identity? At one time, North Yakima Ave was considered to be one of the most beautiful Avenues in Tacoma, because of the trees and the homes. It still is. I guess beauty and esthetics are not important when money is god. I write this not only as a resident of North Yakima, but as a resident of the Stadium District. I am for progress, I have lived in the community for almost fifty years, I have seen the the wonderful changes to downtown Tacoma from when you didn't want to drive down Pacific Avenue at night or even walk downtown in the daylight. Bringing high density into a neighborhood brings more traffic, more people, potentially more crime. Please think long and hard before you sign this rezoning Bill. Once what was there is destroyed, it can't be replaced. And when those new apartments, begin to age, they won't age well, they'll just be ugly, no character apartments.

Sincerely,  
Lani Beug  
823 N Yakima  
Tacoma, Washington 98403  
(253)227-1631

Sent from my iPad

To whom it may concern,

My wife and I have been notified of the proposed re-zoning of our parcel and several others surrounding us in the Eastside neighborhood, notably near McKinley Park. We currently reside at 2901 East K Street, Tacoma, WA 98404.

The specific re-zoning proposal is labeled "E L St & E 29<sup>th</sup> St" on page 71 of the FLUM staff report. The proposal concerns approximately 25 lots, including our own.

We purchased the 2901 East K St, Tacoma, WA home (hereafter referred to as the "2901 home") in March of this year. We were not made aware of the proposal to re-zone immediately as the notification was sent to the previous owner/taxpayer of the property. Hence, we were unable to attend the public hearing on this proposal which took place on May 1, 2019.

I am writing in opposition to such a proposal and a re-zoning of our area. We are currently zoned for R4-L housing, and the proposal suggests a re-zoning to R4 multi-family high density housing.

Firstly, a re-zoning to R4 housing would have a significant impact to our view from our property. We currently have a limited view property, as noted on the county assessor's website. If the re-zoning proposal was to be accepted, and a large apartment complex was developed on the lot immediately to the North at the max height of 60 feet, it would totally obstruct any view from our property. Consequently, this would have a detrimental impact to the value of our property.

As I mentioned earlier, we just purchased the home in March of this year without the knowledge of the proposed re-zoning and the potential imminent development of large apartment complexes which would obstruct the limited view from our property. With that in mind, we do not have the means to also improve on our property and build up to compete with larger complexes in our neighborhood. The re-zoning would again be detrimental to the view and value of our recent purchase in the City of Tacoma.

Secondly, and more importantly, the construct of large multi-family dwellings on these parcels would greatly diminish the historic neighborhood culture of the McKinley Park neighborhood. The tearing down of low density or single family homes for the construct of large, multi-family apartment complexes will greatly damage the community that has been established in this historical neighborhood.

When my wife and I were searching for homes in March of this past year, we were specifically drawn to the 2901 home due to its neighborhood atmosphere fit within a large city. The home and neighborhood allowed a sort of escape from the hustle and claustrophobic atmosphere of the city, and to us was the perfect place to raise a family. We are due with our first child in January and are concerned that the neighborhood aspect of this home and area is in jeopardy with the current re-zoning proposal.

The area proposed for re-zoning is also simply not appropriate to be re-zoned. It will bring in large apartment complexes to a cozy and compact neighborhood in the city. It is calling for overdevelopment in an area which does not need it. The current zoning of R4-L still allows developers to develop multi-family dwellings on these lots but it does so without affecting the view and value of neighboring lots. Developers can still capitalize on the view potential of these lots without damaging others view and value in the neighborhood. More importantly, the R4-L developments would not affect the small neighborhood atmosphere that has grown in the McKinley neighborhood.

There is not an abundance of large grocery stores, shopping centers, and/or commercial buildings in close proximity that would necessitate or benefit from such a re-zoning. None of these types of public places are walkable to public due to hilly terrain, limited sidewalks, quality of sidewalks, or simply distance. Additionally, the neighborhood is not walkable to public transportation to access such places. The access roads are narrow and poorly maintained and are just not suitable for the proposed re-zoning. It is most beneficial to maintain the neighborhood atmosphere and avoid developments which damage that atmosphere, and damage views and values of neighboring properties, by maintaining the current zoning code.

Thank you for your time and consideration,



Travis Bjork

May 17, 2019

Dear Planning Commissioners,

We are writing to express our concerns about the proposed zoning amendment for the Stadium/Seminary District. We are asking you to vote no on the amendments, as written.

In 2011, the city of Tacoma adopted a master plan for historic preservation that is linked to the city's vision. Quoting from the City's website: "*Tacoma's vision for historic resources and its preservation program as it will be in 2020 is described in these qualitative statements:*

1. *Historic resources are integral to the City's overall goals and objectives.*
2. *Historic resources convey the humanity of Tacoma.*
3. *Historic resources are key to the City's sustainability initiatives.*
4. *A network of individuals and organizations supports historic preservation throughout the community.*
5. *Historic Preservation is "horizontally integrated" into planning efforts.*
6. *The City's historic preservation program is readily accessible.*
7. *Historic preservation looks forward while valuing the past.*
8. *Historic preservation is solution oriented.*
9. *The preservation program guides treatment of historic resources."*

In order to operationalize this, a set of goals and policies were adopted. Although there are quite a few policies and actions, there are two themes: preserve neighborhoods and integrate historic preservation into all decisions. Zoning is one of the recommended strategies for executing those policies.

*The Stadium/Seminary District is on the National Register of Historic Places, the first such registry ever approved from the state of Washington. Because of the historic significance of this district, the proposed zoning amendment for the Stadium/Seminary District is in direct conflict with the City's adopted goals for historic preservation.*

In addition to this fundamental conflict, there are other, more pragmatic concerns that haven't been sufficiently addressed to warrant a vote to accept this amendment:

#### **NEIGHBORHOOD DISINTEGRATION**

- **Adding density disrupts neighborhoods.** Neighborhoods are fragile and need to be nourished. Neighborhoods either get stronger or they get weaker and decay.
- **Increasing density in a residential neighborhood increases crime.** Increased density increases transience and turnover of residents in the neighborhood. Neighbors know a lesser percentage of people in the neighborhood
- **Adding zoning density to residential neighborhoods encourages absentee owners to replace homeowners, which destabilizes neighborhoods.** Investors, speculators, and absentee owners will buy properties from homeowners and then rent them. These absentee owners will disinvest in properties, letting them deteriorate since they are speculating on selling the lots in the future for denser residential use.

- **An increase in a neighborhood's density decreases neighborhood involvement.** Density decreases neighborhood personal interaction and involvement, as does the transiency that comes with short term tenants.

#### **INFRASTRUCTURE CONCERNS:**

- **Increased density increases flooding.** Older established neighborhoods were not built for density or with sophisticated drainage systems. These older homes relied on the yard's natural absorption, or water runoff to the alley to protect their primitive pier and beam foundations
- **Adding zoning density encourages existing neighborhoods to be torn down one house at a time.**
- **Adding density clogs the streets with parked cars on the curb.** Many homes in the Stadium/Seminary District don't have garages that accommodate all the cars. As a practical matter, on a standard 50-foot wide lot that includes a driveway and a center sidewalk, there is only room for two cars to park in front of a house. Tree-tunneled streets with cars only periodically parking on the curb will become jammed with cars parked on both sides of the street. This is the reason why many of us have already had to apply for a parking permit.
- **Adding density to established neighborhoods draws mixed-use developments away from neighborhoods in need of investment.** Developers, investors, and builders are attracted to stable neighborhoods. If a builder has the choice of building a duplex or a fourplex in a stable neighborhood or a deteriorated neighborhood, they will choose the stable neighborhood. If a city adds zoning density to stable neighborhoods, this becomes a magnet for builders and investors to build apartments in these stable neighborhoods. Just as significant, it draws investors and developers away from nearby less desirable neighborhoods that have vacant lots and cheaper lots and are already zoned for apartments. *The city should be focused on infill in areas of the city that are under-developed.*
- **Increasing density in established neighborhoods floods the market with new apartments, accelerating the decline and deterioration of older apartments.** Absentee owners neglect the older apartments as they become more difficult to rent. New apartments in a neighborhood cost tenants more to rent, while an increase of apartments reduces the value of homes in the neighborhood. Absentee owners will let the leftover older apartments deteriorate until they are torn down and cleared for a vacant lot or for new, more expensive apartments.

Taken in whole, the argument for voting in favor of this amendment is overwhelmed by the concerns raised here, and the fundamental conflict with existing city policies regarding historic preservation. Please vote NO. Thank you for your full consideration of this information, and for your service to the community.

Sincerely,

*Roy Todd and Paula Crews Bond*

407 North E Street  
Tacoma, WA 98403

# HISTORIC TACOMA

EDUCATION.

ADVOCACY.

PRESERVATION.

[www.HistoricTacoma.org](http://www.HistoricTacoma.org)

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Don Erickson  
Gary Knudson  
Marshall McClintock  
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Rick Semple  
Steve Treffers

## Staff

Michael Lafreniere,  
Outreach &  
Communications Director



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[info@historictacoma.org](mailto:info@historictacoma.org)

*Mailing Address*

PO Box 7664  
Tacoma, WA 98417

April 26, 2019

Tacoma Planning Commission  
747 Market Street, Room 349  
Tacoma, WA 98402

Dear Chair Wamback and Commissioners,

Historic Tacoma opposes the proposed up-zone from R-4L to R-4 of the 400 blocks of N. Tacoma Ave. and N. G. Street; the 400 block of N. Yakima; and a portion of the 500 block of N. Yakima Avenue. This area has been part of the Stadium-Seminary National Register Historic District since 1977 and is thus a recognized historic resource for the city. The current R-4L zoning has a height limit of 35 ft., but the R-4L zoning allows a height of 60 ft. greatly increasing the likelihood that these significant historic resources will be demolished.

Of particular concern is that this up-zone would eliminate a needed transition zone between the Residential-Commercial Mixed-Use (RCX) district from N. 2<sup>nd</sup> St. to N. 3<sup>rd</sup> with a 60 ft. height limit and the R-2 areas beyond N. 5<sup>th</sup>. Additionally, this up-zone would mean that well over 33% of the entire Stadium-Seminary Historic District would have a 60 ft. height limit, which is inimical to preserving the character of this historic resource.

We note that this area falls within the Pre-War Compact residential pattern as defined by the tacHOMEa framework, which is the city's most historic and most dense. Tacoma residents identified building scale as the second priority for maintaining this pattern. Our concerns might be somewhat mitigated if the demolition review (HP-21) or robust design review (H-5.11) promised in 2015 were in place, but these have not been implemented.

The proposed up-zone violates numerous policies in the One Tacoma Comprehensive Plan:

UF-13.2 - Promote infill development within the residential pattern areas that respects the context of the area and contributes to the overall quality of design.

UF-13.21 - Integrate new development into the districts' historic development patterns.

DD-1.5 - Encourage building and street designs that respect the unique built natural, historic, and cultural characteristics of Tacoma's centers, corridors, historic residential pattern areas and open space corridors, described in the Urban Form chapter.

DD-4.1 - Preserve and enhance the quality, character and function of Tacoma's residential neighborhoods.

DD-4.3 - Encourage residential infill development that complements the general scale, character, and natural landscape features of neighborhoods.

DD-6.7 - Maintain public views of prominent landmarks and buildings that serve as visual focal points within streets or that terminate views at the end of streets.

DD-7.1 - Encourage rehabilitation and adaptive reuse of buildings, especially those of historic or cultural significance, to conserve natural resources, reduce waste, and demonstrate stewardship of the built environment.

DD-9.1 - Create transitions in building scale in locations where higher-density and intensity development is adjacent to lower scale and intensity zoning.

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Michael Lafreniere,

Outreach &

Communications Director

DD-13.1 - Encourage the protection and restoration of high-quality historic buildings and places that contribute to the distinctive character and history of Tacoma's evolving urban environment.

DD-13.2 - Encourage development that fills in vacant and underutilized gaps within the established urban fabric, while preserving and complementing historic resources and neighborhood patterns.

DD-13.3 - Protect significant historic structures from demolition until opportunities can be provided for public comment, pursuit of alternatives to demolition, or actions that mitigate for the loss.

H-1.4 - Promote the maintenance and improvement of the existing housing stock and encourage the adaptation of the existing housing stock to accommodate the changing variety of household types.

H-5.11 - Encourage public acceptance of new housing types in historically lower density areas by ensuring that they are well designed and compatible with the character of the neighborhoods in which they are located through a robust design review process.

HP-2 – Integrate Tacoma's historic resources into community planning efforts.

HP-6A – Promote active use of historic properties.

HP-10 – Integrate historic preservation policies into other citywide planning efforts.

HP-11A – Promote urban development strategies that are compatible with historic preservation.

HP-11C – Use historic development patterns to guide planning.

HP-26 – Use zoning tools to promote historic preservation goals and support an overall heritage conservation system.

Sincerely,



Kathleen Brooker

Chair



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[info@historictacoma.org](mailto:info@historictacoma.org)

*Mailing Address*

PO Box 7664

Tacoma, WA 98417

**From:** [Kimberly Castrilli](#)  
**To:** [Planning](#)  
**Subject:** FLUM  
**Date:** Wednesday, May 1, 2019 4:38:32 PM

---

34th and Proctor Future Land Use Implementation.

These property's should remain single family. Changing to R3 or R4 will diminish the quality of life of those who have heavily invested into their homes. There is now to much traffic and little parking.

Thank you,  
Kim Castrilli  
3814 N 35th ST  
Tacoma WA 98407

MARY CHAMBERS LITTLE  
6638/6640 SOUTH ALASKA STREET  
TACOMA, WASHINGTON 98408  
253-432-1077  
[maryevergreen47@gmail.com](mailto:maryevergreen47@gmail.com)

---

May 14, 2019

FLUM/REZONES  
Planning Commission  
747 Market Street  
Room 349  
Tacoma, WA 98402

Dear Planners:

My name is Mary Chambers Little. I live at the above address. My siblings and I are seeking a rezone for our property and we are asking that this be done in 2019.

Although our project may not be on the impressive scale of the major planning initiatives from 2018 such as the subarea plan for the Tacoma Mall Neighborhood, or the interpretive elements along the Prairie Line Trail in Downtown, or the partnership that the City formed with the University of Washington Livable City Program, allowing a rezone on our property could positively affect many future plans that the City has for the Wapato Lake area.

In particular, by allowing multi-family units the City would be increasing the number of persons who live within walking distance not only to the Park but to the many amenities close at hand. They could enjoy it with their families and use the future event features that are projected with the growth of Wapato Lake as a counterpart to Seattle's Green Lake District. It is our hope that Metropolitan Park District will work with a developer to reopen the area of Wapato Lake just across from our land for an entrance into the Park. Our family shares many wonderful memories of running down those paths. It's time for other people to make new memories. This will also discourage unwanted and illegal use of the Park.

We ask the City Planners to consider what other property in the Wapato Lake area might be able to fulfill the needs of so many, located so ideally, in middle of such diversity, and with so much access to neighborhood amenities working towards health, equity, and sustainability? We are the last piece of land of any size that could be used to be of service to so many. Unique!

Here's a shocking idea: a place without cars! There are so many amenities within walking distance that it's like the old-time neighborhood that I remember as a child where we walked everywhere. There's a 12 foot wide sidewalk down Alaska Street that's comfortably wide enough for wheelchairs. Your best friend is your dog? (whose isn't) Walk your dog down to the Park to join his buddies at the dog park. If you have children, there's playground for them. If you like to bar-b-que, there are picnic areas. You need groceries? Walk next door to Winco. You want to go out to a restaurant? What kind of food do you like?. You want to work out to stay fit? Walk next door to the gym. You need a cup of coffee? Starbuck's next door. You want to have a few drinks after a hard day at the office but you don't want to drink and

drive? Walk next door and stagger back if you want. Looking for a job? What kind do you want? You need to go to an appointment? The bus stops in front. You have relatives coming for holidays and need a place to put them up? There are all kinds of motels a few blocks away. You have an accident? There's a fire department down Alaska Street or there's a police sub-station in Wapato Park. Need schools for your children or yourself? There are schools for everyone.

This future development could also include affordable housing in response to the changing housing market and provide high-quality, affordable housing opportunities for all.

Traffic has increased everywhere in Tacoma and it is to be expected since we are growing so rapidly. The "traffic problem" on Alaska Street seems to be with the folks who live close to 72<sup>nd</sup> Street, particularly during rush hours on 72<sup>nd</sup> Street when people are in a hurry to get to work or to get home. The opening of the Winco gate off Alaska Street has caused even more traffic for them. We have never had a problem with the traffic in either getting into or getting out of our property. My one suggestion for any future developer would that everyone leaving this property at rush hour would have to turn left and then they would not impact the folks at 72<sup>nd</sup> street.

Our family is seeking an equitable solution to the future development of our property. Over the years, the environment around us has changed so dramatically. We are not an island so we have been changed too. We see this multi-family development as the possible "heart" of this area. Presently, we are surrounded by so much diversity: on our South side we are overwhelmed by the shopping center; our West side is never ending stream of traffic and noise from I-5; our north side is being reconfigured at the writing of this, and to our East is Wapato Park. The nearest single-family house is almost 3 football fields length away until the future development of property just to our south. This property could be developed to bring continuity to this area.

Thank you,



Mary Chambers Little

CC: STEPHEN ATKINSON; Principal Planner  
BRIAN BOUDET, Planning Manager  
ELLIOT BARNETT, Senior Planner  
MESA SHERIFF, Senior Planner  
LIHUANG WUNG, Senior Planner  
LARRY HARALA, Associate Planner

**From:** [stephen chambers](#)  
**To:** [Planning](#)  
**Subject:** Alaska street rezoning to R4L  
**Date:** Wednesday, May 1, 2019 8:09:32 PM

---

Dear Sirs,

Alaska st. has a great location for additional people to move into this area. Beautiful Wapitou park, close shopping and bus service with easy access to I-5.

Asking the City council to rezone this area to R4L or R4 so more people may move into Alaska st area to enjoy Wapitou park much like Green lake in Seattle.

Sincerely,  
Stephen Chambers

Get [Outlook for Android](#)

May 16, 2019

Tacoma Planning Commission  
747 Market Street, Room 349  
Tacoma, WA 98402

Via Email

Dear Planning Commission,

Thank you for the opportunity to express our concerns. Our home is located at 1109 N I Street, which is immediately adjacent to a potential rezone of the current Comprehensive Plan. As concerned landowners who will be negatively affected by the proposed 2019 Annual Amendment to the One Tacoma Comprehensive Plan and Land Use Regulatory Code ("2019 Amendment"), we are requesting the Tacoma Planning Commission to consider the following comments and concerns:

**1. Fairness and consistency issues:**

- The Committee approved the following criteria to assist in weighing appropriate zoning options for R-4L low density multifamily designation;
  - Transit access is high frequency or high capacity or
  - On designated pedestrian streets or
  - Within ¼ mile walkshed of Mixed-use center

***These criteria do not apply to the N 12th Street & N Yakima Ave rezone area because:***

- Although the City's transportation network map shows N I street as a high frequency/capacity route, we were told during the May 15<sup>th</sup> public meeting that high frequency/capacity transit service is defined as every service every 15 minutes or less. N I street is serviced by Route 16 at a frequency of 30 minutes during prime commute times.
- We could not find any documentation of this potential rezone area is a designated pedestrian street, or what is the definition of a designated pedestrian street, or a list of designated pedestrian streets.
- This potential rezone area is not within ¼ mile walkshed of Mixed-use center. According to the City's mixed-use center map, the Proctor and 6<sup>th</sup> Avenue neighborhood centers are approximately 1 mile from the potential rezone area.

Based on our review of the proposed FLUM, we do not understand why the N 12th Street & N Yakima Ave rezone area is more in line with the above criteria than other areas closer to high frequency/capacity transit, pedestrian streets and mixed-use centers. During the May 15<sup>th</sup>

public meeting, the City planner mentioned that another consideration (or criterion) for potential rezoning was to create housing diversity within large areas of single land use designation.

The attached figure shows our home location relative to the potential rezone area. Why were the areas (shown in purple) not considered as potential rezone areas—How are these areas any different from the potential rezone areas?

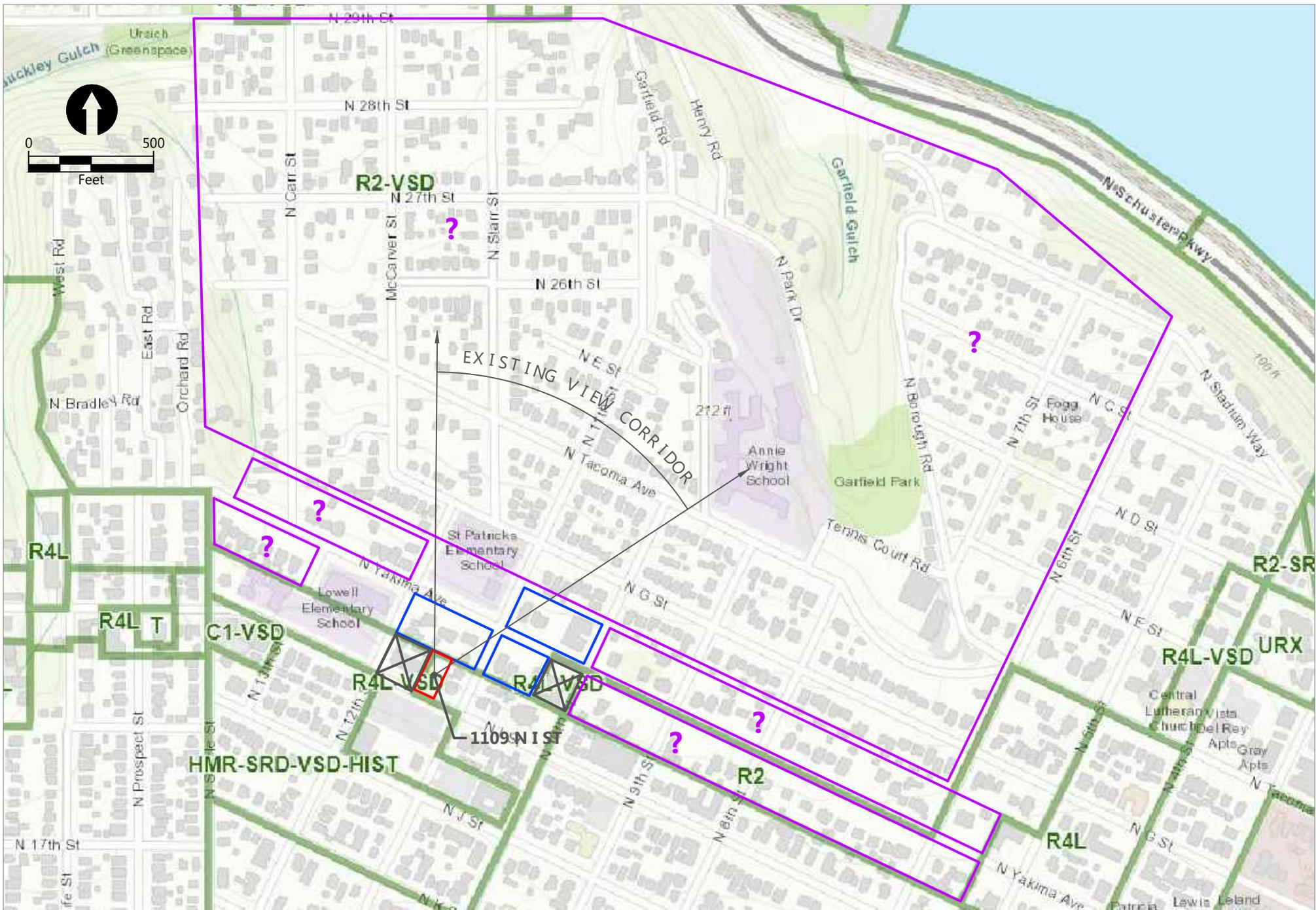
The attached figure also highlights a large area of single land use designation (north and northwest of the potential rezone area). The City's transportation map shows N Tacoma Ave as a high frequency/capacity route. Why were no potential rezone areas considered for this large area of single land use designation?

- The potential rezone area is currently zoned R-2-VSD. This zoning limits building heights to 25 feet for view protection. The current zoning restrictions are in place to protect existing home and land values. Changing the current zoning to R-3 or R4L, changes the maximum building height to 35 feet and voids the VSD (View Sensitive District) protection that is currently in effect.
  - This will significantly diminish our property value those of our neighbors. The attached figure shows how the potential rezone area will affect our existing view corridor.
  - The attached figure shows two adjacent apartment properties property located at 1115 N I St and 1006 N Yakima which are currently zoned R-4L-VSD; this zoning limits building height to 25 ft.
  - ***If the potential rezone occurs – we ask that the R-4L zoning also include the View Sensitive District protection. For consistency and fairness purposes, a R-4L-VSD rezone designation would grant us the same benefits enjoyed by the surrounding properties.***
- Our home is located near the middle of the block and our property lot is zoned Historic Mixed Residential Special Review District & Historic District & View Sensitive with a building height limit of **25 feet**.
  - If this potential rezone occurs – Real estate developers could potentially build a 35-foot structure directly in front of our lot. Based on current zoning we could not build a 35-foot structure—we would be limited to a 25-foot single family structure.
  - ***For consistency and fairness, if the rezone does occur, we ask the Planning Commission to change our property's zoning to R-4 (matching the zoning of the property immediately to the west of our property) or include our property in the rezone with an R-4 zoning designation.***

2. **Safety Concerns:** Additional volume of vehicles (parked and moving) would increase the potential of traffic accidents.
  - The N 12th St & N Yakima Ave rezone area is directly across the street of two schools: Lowell Elementary School and St. Patrick Grade School. Currently, there are parking and major traffic issues during school drop off and pick up. More density in this block is a potential safety issue for students getting in and out of their cars.
  - The volume of parked cars is already a safety concern in this area. Due to the lack of on-street parking, drivers are parking close to intersections and often directly in front of sidewalks. This is currently causing significant safety issues:
    1. For drivers entering these intersections, because they are unable to see on-coming vehicles because parked cars are blocking their line of sight.
    2. For pedestrians crossing at these intersections, because they must to walk into the intersection and look four ways over parked cars.
  
3. **Infrastructure Concerns:** The additional density accompanying the potential rezone will intensify:
  - The current stormwater runoff problem of ponding water.
  - The current problem of distressed pavements.

Thank you, considering our comments and concerns.

David and Stephanie Cisakowski  
1109 N I St  
Tacoma, WA



- 1109 N I ST
- PROPOSED REZONE
- AREAS NOT CONSIDERED FOR REZONE
- EXISTING APARTMENT BUILDING

**FIGURE 1**  
**1109 N I ST LETTER TO PLANNING COMISSION**

922 S. Mountain View Ave.  
Tacoma, WA 98465  
email:jane.evancho@wamail.net

May 16, 2019

To:Planning Commissioners

Re:2019 Amendments To the Comprehensive Plan & Land Use Regulatory Code, Future Land Use Map Implementation

Commissioners,

I am writing to provide comments on the residential rezones proposed as a part of the 2019 amendments to the Comprehensive Plan.

The staff handout regarding 2019 Amendments to the Comprehensive Plan and Land Use Regulatory Code stated policy context regarding housing. This indicated 4 goals- diversity/supply, affordability/access, location and maintaining neighborhood patterns and integration of multifamily into neighborhoods. The proposed rezones provide potential for more multifamily but do not maintain neighborhood patterns and integration of multifamily into neighborhoods. Recent concerns regarding a proposed storage facility in central Tacoma at 19th and Lawrence St. have also brought to light the need for design review standards to address transitions.

In the case of the Narrows neighborhood, an area of affordable single-family homes would be destroyed by this proposed rezone. In addition, convenient transit access is not provided by Pierce Transit and would result in occupants using automobiles for business and personal purposes. Specific comments follow:

**Implement Urban Design Studio/Design Review Program** - Prioritize the creation and implementation of design review standards to effectively integrate multifamily into neighborhoods before implementing rezones. Currently the policy of "maintaining neighborhood patterns and integration of multifamily into neighborhoods" is not being met. Current zone transitions, as demonstrated in the Tacoma Mall area and S. 24th & State St. result in piecemeal, jarring developments that are not maintaining neighborhood patterns. **These design review standards should be developed as code before rezones occur.**

**Review all areas for multifamily prior to rezone.**-With transit and other agency participation, conduct a thorough review of residential and underutilized commercial areas on established transit routes, such as the K-Mart 10.6 acre site at 5132 6th Ave. and rezone those for mixed use. The planned redevelopment of the James Center North property, with transit access, should be the model to follow. Piecemeal rezoning should

be avoided to strive to maintain existing neighborhood patterns, which have made Tacoma a desirable place to live.

**Delete proposed Narrows rezone from Plan:** The Narrows area is a functioning affordable neighborhood of single family homes. The current rezone proposal to R-4L would result in the 4-plex construction that is incompatible and currently does not transition with existing housing. In addition, the proposed Narrows rezone does not meet the access/location criteria stated by staff. The nearest stop for the Pierce Transit Route #1(6th Ave.-Pacific Ave.) is in 6500 block of 6th Ave, which is not accessible or convenient to residents in the Narrows area. Route #100(Gig Harbor) has a frequency of once/hour. This will result in vehicle use and congested parking on streets, as is the current practice in Tacoma Mall area and S. 24th and State St.

With careful planned changes, zoning changes can meet the policy goals of the Comprehensive Plan. Thank you for your work on this issue and your thoughtful efforts to make Tacoma a better, more livable place.

Sincerely,

Jane Evancho



Chair Wamback  
Tacoma Planning Commission  
747 Market Street, Room 345  
Tacoma, WA 98402

May 15, 2019

RE: 2019 Amendments to the Comp Plan and Regulatory Code

Dear Chair Wamback:

The West End Neighborhood Council would like to go on record regarding the Comp Plan Amendments after having attended your May 3, 2019 meeting and Public Hearing at the City of Tacoma. During this meeting, it was stated that the goals were diversity and supply; affordable housing access; maintaining neighborhood patterns and integrating multifamily housing into neighborhoods.

If this is amended as written, the Narrows Neighborhood, an affordable housing area in the West End made up of single family homes, would be destroyed by the rezone. This affordable neighborhood would result in more 4 plex constructions that would completely take away from the neighborhood atmosphere that currently exists, and it does not appear that design standards for this area have been considered for the current structures going in. We feel that the buildings going in on the 6400 block of 6<sup>th</sup> Ave. do not fit with the architecture of the area; there is no transition with the existing houses; and this type of construction does not maintain the neighborhood pattern.

We see that this is not only going to impact getting to and from this area, but if this amendment goes through, the schools, infrastructure and utilities will all be impacted negatively; and there definitely are not enough police officers to patrol and keep up with this area and the problems that will arise from such construction.

The West End feels that design standards need to be set, especially for the multifamily construction projects, and this needs to be completed before rezoning is accomplished. It would also be best to look at the underutilized area where the K-Mart used to be for this type of development, not in a long established single family neighborhood where the residents have already asked you not to rezone their area. We therefore are asking that you delete the Narrows Rezone from the Comp Plan Amendments.

Sincerely,

*Elton Gatewood/EG*

Elton Gatewood, Chair  
West End Neighborhood Council

Cc: Mayor Woodards and City Council Members  
City Manager Elizabeth Pauli

**From:** [Hayley Henry](#)  
**To:** [Planning](#)  
**Subject:** In Opposition of the 2019 Comprehensive Plan and Land Use Regulation Amendments  
**Date:** Friday, May 3, 2019 11:16:38 AM

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May 3, 2019

Planning Commission  
747 Market Street, Rm 349  
Tacoma, WA 98402

RE: 2019 Comprehensive Plan and Land Use Regulation Amendments

Dear Planning Commission,

My name is Hayley Henry. I'm currently a resident of East Tacoma. I grew up in the Tacoma area for most of my life. My father served in the United States Air Force for 35 years and was stationed at McCord Air Force Base. My mother was raised on the East side of Tacoma and has worked for the Puyallup Tribe of Indians for 40 years. Tacoma is my home. Last year I was fortunate enough to become a homeowner in the Strawberry Hill area of East Tacoma and have since fallen in love with it. I have a beautiful view of the bay, downtown Tacoma and the Tide Flats. Prior to purchasing my home, I did my diligence of looking into my neighborhood zoning and was assured by the city of Tacoma's website and an attorney that my neighborhood was a multiple family low density neighborhood which limits new development height to 35 feet. Unfortunately, a year later I have to fight to protect the biggest investment I have ever made; my home.

I'm writing to ask that you strongly reconsider rezoning the neighborhood of East Tacoma specifically E. L St. to E. 29<sup>th</sup> St. from a multiple family low density neighborhood to a multiple family high density area. I ask that you reconsider the comprehensive plan that would obstruct scenic views, decrease home values, increase traffic, increase noise, demolish 100-year-old historical homes and forever change Strawberry Hill for current and future residents.

I have a number of issues with the proposed rezoning. See below:

**1. East and South Tacoma homeowners do not have the same protections as homeowners in North Tacoma.**

1. There are regulations for height restrictions for new development in North Tacoma in multiple family low density zoning districts. The View Sensitive District Overlay Zone is set in North Tacoma to protect homeowner properties and home value by limiting development of 25 feet and prevent issues like rezoning. However, East and South Tacoma do not have the View Sensitive District Overlay. This regulation is not consistently applied across Pierce County. I ask that you create internal consistency with the VSD.
2. Rezoning proposals are disproportionately occurring in lower income communities; South and East Tacoma. Approximately 50% of all rezoning are happening in the lower three socioeconomic districts of Tacoma. If the issue is to meet housing demands, why are the majority of high-density rezoning areas occurring in primarily three districts? If housing is a need across all districts of

Tacoma then high-density rezoning should be implemented equally among the districts.

1. Why are 50% of rezoning happening in three lower income areas? Is it because these districts meet criteria for selected rezoning areas? In fact, my neighborhood does not meet most of the listed criteria for area selection to rezone (more info in section 2). Is it because there is more available real estate in these areas? If that's the case why would you reduce the housing market for one of the more affordable neighborhoods in Tacoma. The implementation of the rezoning plan would reduce affordable housing for homeowners. A fundamental way to achieve wealth is through investing in real estate where expenses are fixed and you build equity. Affordable housing can be accomplished through homeownership not just by increasing rentals.
3. According to the data (on most recent consensus), low socioeconomic communities are being targeted. What message is this sending to homeowners wanting to invest in these communities? My take away is that one of my most valuable assets (my home) is not protected in these communities compared to other districts of Tacoma and this area is subject to the discretion of the county to devalue my home because of potential rezoning. Theme: Steal from the poor and give to the rich (developers).
  1. Homeowners in East and South Tacoma are not treated equally. This is concerning considering lower income resides and largely minority families are more represented in East and South Tacoma. This is unfair treatment due to socioeconomic status. To me this is a social justice issue! I urge you to act on this matter!
4. According to the consensus and the city's proposal, there is a low representation in response rates from East and South Tacoma regarding the County's Comprehensive Plan and land use regulation proposal. According to the proposal you want to increase the public response in these communities. What are you doing to increase public comment on site specific levels? Do you feel like you have a fair evaluation from the communities that would be directly impacted? I personally had two people knock on my door to inform me that the L. St Bridge was going to be closed. I have had no one knock on my door to inform me of the rezoning proposal; a long term irreversible plan that greatly impacts my property value and neighborhood.
  1. In addition, there are more renters in East and South Tacoma. If you are requesting public comment from the renters instead of the homeowners than you will collect different perspectives. Renters (who invest in a one year lease) have different interest in the community than homeowners. Homeowners are interested in long term investments of their communities. For instance, I am a homeowner who just signed a 30 year lease. My

neighbor who rents... signed a 6 month lease. You can see how our interest in this community may vary. How do you weigh the views of homeowner's versus renters? How are you making sure homeowners receive information on this proposal besides delivering a flyer to the home where renters live?

2. **The descriptions listed on your comprehensive plan on how to select areas to rezone do not align with the East Tacoma area (specifically East L. St and East 29<sup>th</sup> St).** The zoning selection criteria are: "transit access, designated pedestrian streets or within ¼ walkshed of a mixed-use center". Access roads are narrow and are not maintained. There is on-street parking which allows one car at a time. There is an alley way between my property and the designated parcel you would rezone for a multi family high density area. This alley way is the only access point to my neighbor's home. This is not a walkable area. According to Redfin, the walkable score is 41 out of 100 which receives the category of "car dependent" on their website. This neighborhood has crumbling sidewalks if they have sidewalks at all. Although we are close to I-5 freeway entrance, public transportation is not walkable.
  1. Another description listed on the comprehensive plan to select this area for rezoning is "this area has view potential". Yes, it does. How are you protecting this "view potential" for homeowners who have already invested in this area? If you build a large apartment complex in front of my home you decrease my home value. You obstruct my views. This is not okay.
  2. Another description on the comprehensive plan to select this area between L St and E. 29<sup>th</sup> St. is that it will increase affordable housing due to the demand for housing in Tacoma. Affordable housing with "potential view" is a dichotomy. Never in my renting history were properties with a view considered affordable. I challenge your true interest behind this description. I feel the city is not being transparent with the true intentions of rezoning this area. It is not to increase affordable housing. Furthermore, there are ways to increase affordable housing in this community while keeping it a multiple family low density zoning district. I ask that you pursue these ways first.
3. **This is a historical community.** My home is 100 years old. Strawberry Hill and McKinley Park are historical sites in Tacoma. According to Metro Parks, McKinley Park and surrounding homes were developed in 1901. According to the Pierce County Historical Preservation website, "Historical and cultural properties [like this area] are non-renewable resources that showcase the significant history of Pierce County architectural styles and cultural groups". I would like to see the charm and historical homes be preserved not torn down to accommodate developers. Again, there are other areas in Tacoma (much wealthier areas) where an immense amount of effort and money is put in to preserving the history. I'd like to see the same effort applied city wide including my neighborhood. Tearing down homes to build a large apartment complex and forever changing the Strawberry Hill community is not the answer. Let's keep the history of Tacoma alive... throughout Tacoma.

- a. Again, there is a disparity between the protections of homeowners in North Tacoma compared to those in East Tacoma. If this area was registered as a historical site (like most of the North end of Tacoma is), there would be specific protections for these properties; ones that would restrict the city from following through with the proposed rezoning.

In closing, I sincerely ask that you rethink the comprehensive plan to rezone the area of East Tacoma specifically the E. L. St and E. 29<sup>th</sup> St. I hope you find it in your hearts to preserve this historical community, to fight for equal representation for all Pierce County resides by implementing consistent application of protective factors for homeowners such as the View Sensitive Overlay and efforts for Historical Perseveration. I ask that you address the disproportionate rezoning happening in lower socioeconomic communities; communities that seem to not have a heard voice in matters that seriously impact their home equity and community. I ask that you be in opposition of the future land use implementation and “areawide” rezones.

There is a known misalignment between the plan and zoning and I ask that you not overlook pertinent information I highlighted above. I ask that you not rectify these inconsistencies by rezoning. Instead I ask that you re-evaluate the comprehensive plan. I ask that you find other ways to find affordable housing and address housing demands.

Thank you for your time and consideration.

Sincerely,

A concerned Pierce County Homeowner,  
Hayley Henry

Sent from [Outlook](#)

May 6, 2019

Planning Commission  
747 Market Street, Rm 349  
Tacoma, WA 98402

RE: 2019 Comprehensive Plan and Land Use Regulation Amendments

Dear Planning Commission,

I'm writing to express my views regarding the rezoning proposal of E. L. St and E. 29<sup>th</sup> St. I'm strongly in opposition of the rezoning proposal for E. L Street and E. 29th Street which would change the zoning from R-4L, a multiple family low density district to R-4, multiple family high density district.

According to your website, this area is proposed to be rezoned because:

1. The current Comprehensive Plan designation of Multi-family (high density);
2. Proximately to lower Portland Crossroads Center and McKinley Park;
3. This area has view potential.

I have a number of issues with this proposal. Specifically,

- A. Misalignment of the current Comprehensive Plan with zoning areas is an inadequate reason to pursue monumental change that will forever change Strawberry Hill, and negatively impact current homeowners of this neighborhood.
- B. According to most recent consensus, densification efforts are disproportionately happening in the three lower income districts. In fact, 50 percent of rezoning proposals are in the lower three socioeconomic districts.
- C. The neighborhood surrounding 29<sup>th</sup> street is a beloved neighborhood that has been around since 1901 when McKinley Park was developed. It's historical in nature with historical architectural homes. If you pursue this rezoning you will negatively impact this neighborhood for current and future residents. This neighborhood should be preserved as a historical area.
- D. The neighborhood of E. L St and E. 29<sup>th</sup> ST does not meet most of the listed criteria for area selection to rezone. The zoning selection criteria are: "transit access, designated pedestrian streets or within ¼ walkshed of a mixed-use center". Access roads are narrow and are not maintained. There is on-street parking which allows one car at a time. This is not a walkable area. According to Redfin, the walkable score is 41 out of 100 which receives the category of "car dependent" on their website. This neighborhood has crumbling sidewalks if they have sidewalks at all. Although we are close to I-5 freeway entrance, public transportation is not walkable.

- E. The implementation of the rezoning plan would reduce affordable housing for homeowners not just by building large complexes in their neighborhoods but by eliminating views. This will certainly reduce property values. How do you compensate current homeowners who have been investing in this area for decades?
- F. Affordable housing can be achieved besides increasing rentals. A fundamental way to achieve wealth is through investing in real estate where expenses are fixed and you build equity. Affordable housing can be accomplished through homeownership not just by increasing rentals.
- G. There are regulations for height restrictions for new development in affluent communities in Pierce County such as North Tacoma and North East Tacoma. The View Sensitive District Overlay Zone is set in North Tacoma to protect homeowner properties, views and home value by limiting development of 25 feet and prevent issues like rezoning. However, East and South Tacoma do not have the View Sensitive District Overlay. This regulation is not consistently applied across Pierce County. I ask that you create internal consistency with the VSD.
- H. There is concern that the neighborhood of E. L St is not aware of the proposed rezoning. It seems unethical to proceed with such a large change without the knowledge and support of the community to which it will directly impact. This is a site-specific proposal and therefore efforts should be made to adequately inform homeowners in this community of the proposal.

I ask that you strongly reconsider the proposal to rezone the neighborhood of E. L. St and E. 29<sup>th</sup> St. It is a ludicrously disordered approach to rezone in efforts to make an aged "comprehensive plan consistent". I ask that you have equal protection for homeowners in Pierce County by consistently applying the View Sensitive Overlay and that equal efforts are made to preserve historical areas throughout Tacoma. I ask that you pursue other means to meet housing demands in Pierce County for example by allowing homeowners to have detached rentals, by pursuing densification efforts in other districts.

Sincerely,

Thomas Henry

### 5.17.19

72<sup>nd</sup> and Alaska – Wapato Rezoning proposal.

I am Lori Kalac, homeowner and resident of 7010 South Alaska. Though our home is not part of the current targeted rezone area, the potential rezone will affect our property and lives.

Rezoning has been occurring throughout our neighborhood for decades, many times without warning or notification, more recent with notification and strong neighborhood opposition. The original notification of rezoning was presented with a larger scope of parcels involved and a proposal of R2 to C2. The current proposal has modified the original, dividing the original targeted parcels into 2 separate sections with separate proposals, and separate timing. The city has not provided an explanation how this approach supports the Comprehensive Plan, what it feels like is the city is setting themselves up to ensure their preferred outcome is secured. What is the reason for the separation, and how was it determined to be most effective and logical?

The current section under consideration this year is proposed to move from R2 to a R3 zoning. The literature provided to describe R3 zoning for this specific district states: TWO FAMILY DWELLING DISTRICT, yet the description provided for R3 zoning states, one, two, or *three* family dwelling, which one is the reality of what will be approved to build in this specific proposed area?

The Public Notice that was posted and distributed to the effected property owners last year with regards to the 2 vacant parcels located in this proposed targeted area stated the notice reflects 2 parcels with a proposed 12-lot subdivision with private roads and utility extensions for single family residential. Does this Public Notice still hold true as there has been no movement since the developer cleared the parcels for this intended purpose? How does the intent for these parcels support the proposed re-zone?

2019 Comprehensive Plan and Land use Code Amendments Future Land Use Implementation overview for S. 72<sup>nd</sup> and Alaska offers the highlighted points to support the rezone proposal. I have added my comments to these points. I encourage you to read through these comments and questions, and as you consider this proposal how are these questions answered, and do those answers support this proposed rezoning, and the homeowners and residents this change would affect?

Why is this area proposed to be rezoned?

**1. Current (2019?) Comprehensive Plan designates this zoning proposal as multi-family (low density)**

Since these are terms used in urban planning is it safe to translate this to: It's in the best interest of the city and developers to utilize the targeted parcels to construct multiple, higher structures to house more individuals in a condensed area eliminating the single family homeowners and increasing the income of the city and developers? If this isn't a safe understanding how does this fit into the plan, and how does it support other city initiatives such as ADU's, an initiative that was adopted by the City Council?

**2. This area is served by transit.**

There are plenty of areas throughout the city that are served by transit and aren't zoned R3 – for a close example, Sheridan Ave, on the east side of Wapato, why isn't this area targeted for a rezone?

**3. Direct access to Wapato Park, and commercial shopping including a grocery store.**

If direct means across the street then yes, however the more direct access both by foot and vehicle is Sheridan Ave on the east side of Wapato Park, why aren't those parcels part of a rezone consideration? The parcels north of the proposed area on Alaska

also have these considerations, why wouldn't they be included in the rezone proposal?

If consideration to rezone R2 parcels to R3 rely on direct access to commercial shopping and grocery stores, our city is littered with potential proposed rezone options; 72<sup>nd</sup> and Pacific Fred Meyer shopping center, 19<sup>th</sup> and Stevens Fred Meyer shopping center, this area also includes Snake Lake Nature Center, Safeway Proctor District, also offering a park, Puget Park. The conditions of commercial shopping, grocery stores, and parks mentioned above have R2 neighborhoods surrounding these conditions that are being presented for reason to move from R2 to R3 in the targeted area, if they are considered to be reasonable and fit to the Comprehensive Plan, why isn't this zoning considered throughout the city, specifically in the areas offered as examples above? What happens when the commercial shopping and grocery stores are no longer offered as direct access, there aren't guarantees that businesses stay put, or open.

**4. Area has improved bicycle facilities.**

Does this point mean, bicycle lanes, as there are no bicycle racks, or storage units in the proposed area. With the push to install safe lanes for bicycles there are many other R2 areas throughout the city that could also be considered for a rezone to R3 if this is a reasonable reason to consider the targeted area. Incidentally the existing bicycle lanes on Alaska street are seldom used for bicycles but rather abandoned grocery carts.

**5. Transition between commercial and recreational use.**

This seems an odd point, as there is an existing transition; R2 single family homes. How does the proposed R3 re-zone offer an improved transition?

One character that is expected in an R3 zoning is low residential traffic. That expectation is unrealistic for this proposed area. The average family produces 1 car for every driver in the home. Multi-family units will increase the volume of residential traffic to an already heavy volume trafficked street. An additional challenge with increased vehicles to lot size is parking....

I encourage the current zoning of R2 to remain and am hopeful the Planning Commission and City Council will see R2 makes sense to remain in the proposed area and throughout Alaska street.

Response to these questions is appreciated, my contact information is below.

Lori Kalac  
lbkalac@gmail.com

April 17, 2019

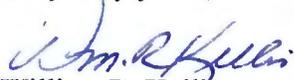
City of Tacoma Planning Commission  
Tacoma, WA 98421

RE: Hearing on 5/1/2019 for future land use and area wide rezones

Dear Members of the Planning Commission:

I received a notice for a hearing on May 1, 2019 for the purpose of discussing the implementation of FLUM/ REZONES in an area that adjoins a property that we own at 56<sup>th</sup> and Tacoma Mall Boulevard. In addition to the property we developed many years ago at 2115 South 56<sup>th</sup> Street, we also own a single family house at the corner of our office park at 2106 S. Railroad Avenue. We would like to encourage the planning commission to consider extending the commercial zoning to include the properties north on Tacoma Mall Blvd. from our property on 56<sup>th</sup> Street and on Railroad Street to South 54<sup>th</sup> Street. There are four properties along Tacoma Mall Boulevard that are zoned R-2 that are between the Tacoma Corporate Center office park and the massage studio at 5402 Tacoma Mall Boulevard ( see attached map). It seems only logical to include these four parcels on Tacoma Mall Boulevard, since they are across the street from a Shell Gas station and in between two other commercial utilized properties.

Very truly yours,



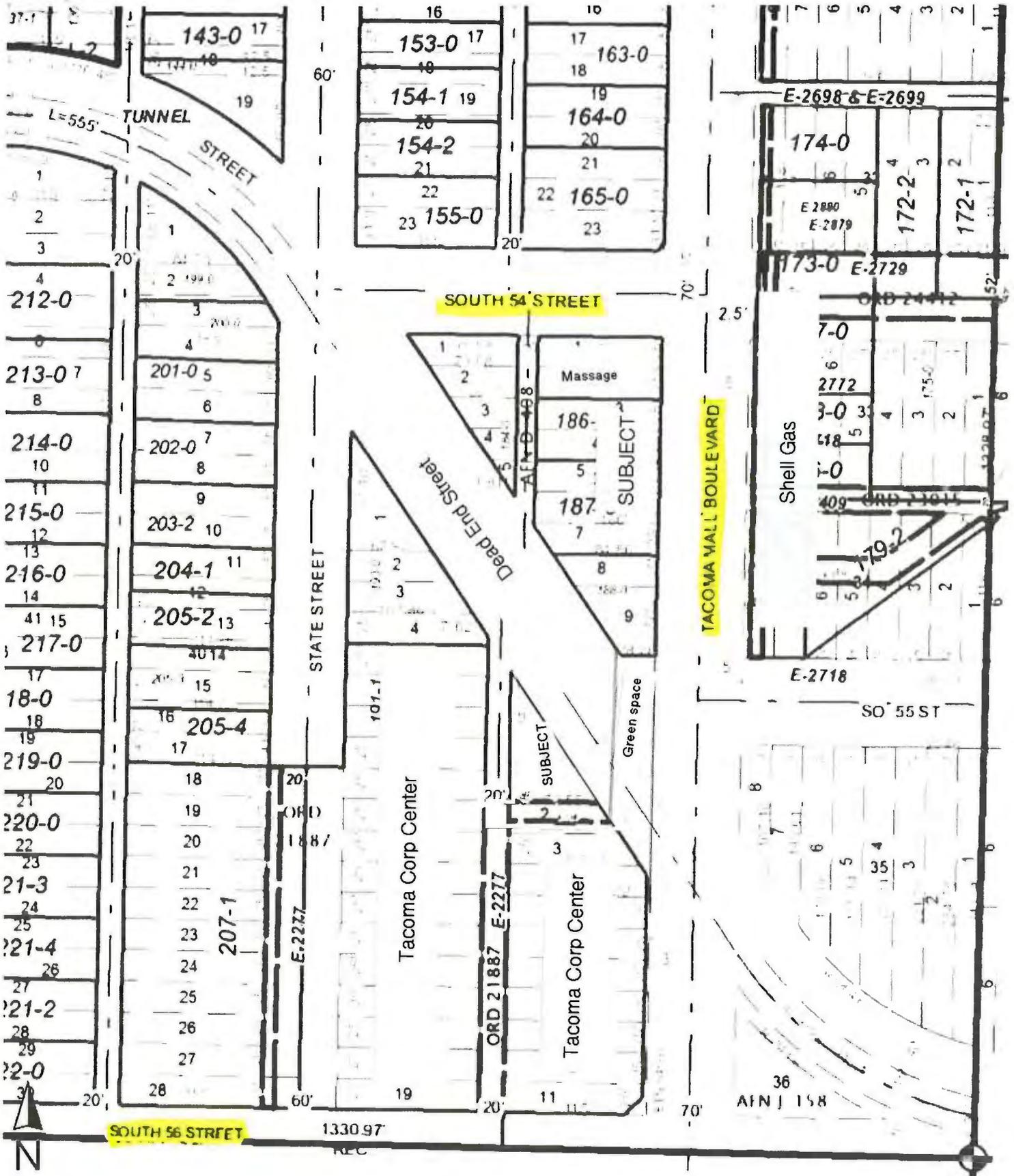
William R. Kellis

Owner/Tacoma Corporate Center

## TACOMA CORPORATE CENTER

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2605 N. Starr / Tacoma, Washington 98403 / Phone (253) 376-5482



**CHICAGO TITLE  
OF WASHINGTON**  
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This map/plat is being furnished as an aid in locating the herein described land in relation to adjoining streets, natural boundaries and other land, and is not a survey of the land depicted. Except to the extent a policy of title insurance is expressly modified by endorsement, if any, the company does not insure dimensions, distances, location of easements, acreage or other matters shown thereon.

-----Original Message-----

From: Debbie Labrie [mailto:djbl5@yahoo.com]

Sent: Wednesday, May 08, 2019 11:38 AM

To: Planning

Subject: El st & E 29th st



image1.JPG



ATT00001.txt

Please Don't except this....

1. The qualities of our neighborhood aren't congruent with criteria for zoning: Access roads are narrow and poorly maintained, there is on street parking, not walkable to public due to limited side walks, quality of side walks and hilly terrain. Not walkable to public transportation.
2. No view protection: East Tacoma doesn't have View Sensitive District Overlay like much of North Tacoma does that prevents new development from exceeding 25 feet in height and protects homeowners property value. Therefore, the View Sensitive Overlay isn't consistently applied city wide.
  - a. Tacoma districts such as North End, North East, and West
3. Strawberry Hill and McKinley Park are historical neighbors dating back to 1900. Tearing down homes and building large apartment complexes will forever change this residential community and conflicts with historical preservation efforts that unfortunately are also not equally distributed throughout Tacoma.
4. Approximately 50% of high density rezoning is happening in lower income communities like East and South Tacoma compared to North Tacoma and North East Tacoma.
5. The city is marketing this change for more affordable housing and to meet housing demands. Affordable housing with a view? Likely there are other interest involved. Also, affordable housing can be accomplished in other ways besides increasing large rentals. Alternatives include allowing mother-in-law detached rentals for current homeowners. And home ownership! East Tacoma is more of the affordable housing compared to other districts.. tearing down homes to build large apartment complexes is contradictory. Plus, efforts are city wide. Remember, it's mainly happening in a few districts.

**From:** Therese Lewis [<mailto:thereseflewis@yahoo.com>]  
**Sent:** Monday, February 4, 2019 9:28 AM  
**To:** PDS Permit Plan Desk <[permitplandesk@ci.tacoma.wa.us](mailto:permitplandesk@ci.tacoma.wa.us)>  
**Subject:** Redistricting N Yakima Ave....Again...

I spoke with Stephen Atkinson last year, and now am again noting no change in the proposed redistricting Here's what I said last time:

Are you kidding? rezoning these to R4/R5? the house on the corner (502 n yakima) is on the historic register, and the one across the street-The Rust Mansion-come on! Both these homes are listed at \$1.7M, is it really fair to anyone in this area to propose rezoning this to R4/R5? these homes are well maintained, currently single family dwellings, and only the first few lots? N Yakima has a 'reputation" that attracts visitors and buyers-please don't mess this up! Low density seems reasonable, but high density? really'?

Is this happening because somebody knows somebody and there are strings being pulled?? It's EXTREMELY upsetting. I know 502 N Yakima was sold and looks like they are planning to cur it up...such a terrible shame...

On top of everything, there are already growing traffic issues in the Stadium area and now you want to add MORE high density dwelling?

I am so sad-disturbed-disappointed-distressed. Just leave our corner alone!!! Please!!!

Therese & Kevin Lewis  
510 N Yakima Ave  
Tacoma, WA 98403

## MICHAEL LIND LAW OFFICE

3124 E. Valleyview Terrace  
Tacoma, WA 98404  
Ph. 253.224.7590  
Fx. 253.627.4087  
e-mail: Michael\_Lind\_911@msn.com

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May 17, 2019

City of Tacoma  
Planning Commission  
747 Market Street, Room 349  
Tacoma, WA 98402

Fx: 253.591.5433

SUBJ: Proposed Rezoning: R-4 Multi-family Housing for E L St & E 29<sup>th</sup> St.

Dear Planning Commission:

My name is Michael Lind and I am writing to you because I disagree with your proposed zoning district: R-4 multi-family (high density) housing for E L St & E 29<sup>th</sup> St. My first and main point of contention is that View Sensitive Overlay is not being applied to East Tacoma. How is it that if North Tacoma has View Sensitive District Overlay, yet East Tacoma, still part of the city of Tacoma, it doesn't apply? There should not be any development allowed to exceed 25 feet in height to protect homeowners' property value.

Second, at no point did I receive notice of this proposal. Why should I have been provided notice of this proposal? Because this proposal directly impacts my view and decreases my property value. Notice was not placed in the planned location for residents to be made aware of the proposal. Notice was not sent to each resident that this planned development would impact.

Third, you intend to build multi-family housing in an area that devalues the property of nearly all the families that live in the neighborhood. This "Class" of people have collective rights against the government devaluing their property. Are you telling me that there is no other location for this project? If your answer is no, then it becomes very clear that this is more about a developer wanting to build water view properties at the expense of those who already have the view. I'm pretty sure that the property values will decline for the many already here to the extent that the few who benefit from your project will not be able to make up for the loss in revenue.

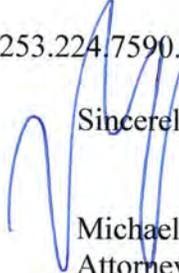
My wife and I have chosen to live in this neighborhood for 18 years because of the view. We have spent over \$100,00.00 upgrading our home and property because we decided early on that this house would be our last home we would ever own. Now, you intend to take that away from us. Not just us, but from the "Class" of us home-owners

SUBJ: Proposed Rezoning: R-4 Multi-family Housing for E L St & E 29<sup>th</sup> St.  
DATE: May 17, 2019  
PAGE: Two

that enjoy the water view. I can't think of a worse way to manage growth for the City of Tacoma and its residents. In case you didn't know this, but from a business standpoint, you should not try to erode your tax base and decrease home values from the many for the potential few who don't even exist.

Thank you. I can be reached at 253.224.7590.

Sincerely,

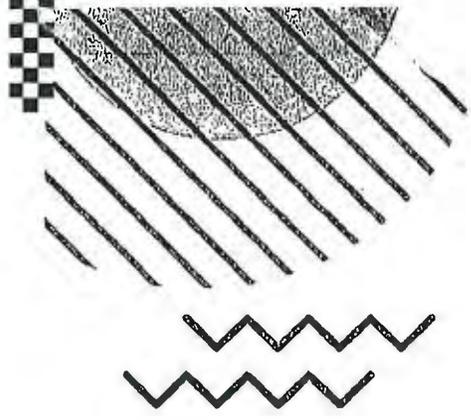


Michael S. Lind  
Attorney at Law

TRANSMISSION VERIFICATION REPORT

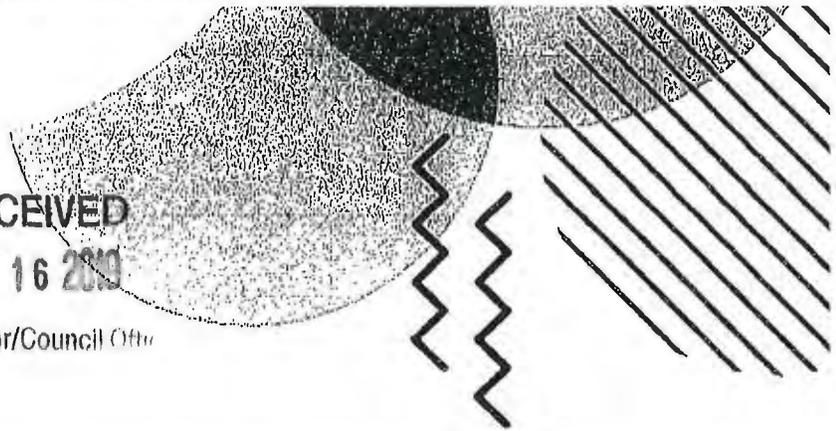
TIME : 05/17/2019 11:36  
NAME : MIKE LIND  
FAX : 2536274087  
TEL : 2532247590  
SER.# : BROF2J379308

DATE, TIME	05/17 11:35
FAX NO./NAME	12535915433
DURATION	00:00:50
PAGE(S)	02
RESULT	OK
MODE	STANDARD



RECEIVED  
MAY 16 2019

The Mayor/Council Office



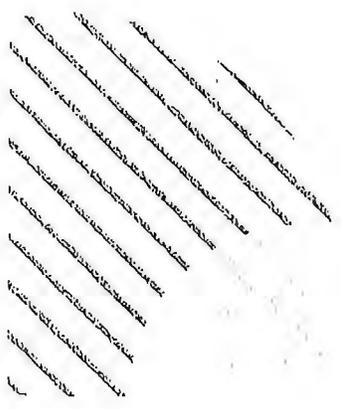
FAX

Date: 5-16-19  
From: D'Ann A  
Phone: 253.279.1977  
Fax: 253.300.8980

To: Council member C. Ushka  
Phone:  
Fax: 253-591-5123

Comments: Concerns about rezoning  
of East 2 + East 29  
Strawberry Hill

This facsimile contains confidential information that may also be medically or legally privileged and which is intended only for use of the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any dissemination or copying of this facsimile is strictly prohibited. If you received this fax in error, please notify sender by telephone at 253.279.1977.



May 15, 2019  
Planning Commission  
City Of Tacoma  
747 Market Street, Room 349  
Tacoma WA. 98402

Dear Sir,

My name is Delores Anderson and I'm writing to you today to discuss the property rezoning ordinance through the "2019 Amendment" which rezones parts of Pierce County for affordable housing and multi-family properties. The specific properties dedicated in rezoning are between East L street and East 29<sup>th</sup>. There are 24 home owners that have view properties in the Strawberry Hill area of East Tacoma, my house has a perfect view of the city of Tacoma. From my back deck, I can see The Puyallup River, the cascade mountain range, the Port of Tacoma, Browns Point, a portion of Vashon Island, the Commencement Bay, the Union Station, which is now the 9<sup>th</sup> District house, and upper Tacoma, and I can see the Saint Joseph's hospital.

Our view property has been in our family for four generations, I have resided at 1011 East 30<sup>th</sup> Street for 54 years, and wish to deed the house to my granddaughter upon my passing, making this a 5-generation-owned house. My life partner of 38 years and I found an opportunity to purchase a duplex at 1017 and 1019 East 30<sup>th</sup> Street, in 2013. The main deciding factor to purchase this property was the view from both duplexes. The view is similar to the view in our house. We had other opportunities to purchase other duplexes in the same area, and chose this because of the view.

The current rezoning limitations will limit the buildings in R-4 zones to 60 feet in height. This will block 24 homeowner's views on Strawberry Hill, East "L" street and Mckinley Avenue. The zoning restrictions will inhibit homeowners from their view property and substantially depreciate each home affected. I am requesting that the city of Tacoma planning commission hear The East Tacoma citizen's voices before initiating the R-4 zoning in East Tacoma.

We're requesting that the height limit be limited to 30 feet in height in areas that will obstruct homeowner's views and substantially depreciate homes in the area.

Our family has seen the changes in Tacoma's Eastside neighborhood from the 1930's, and my family and I have experienced the changes since 1981. Still, there are no buses that run on East "L" Street, there are no sidewalks on that street either. There are no elementary, middle school or high school in this area in walking distance, so students must use the school/city bus, or be transported by family members or walk. The area of Upper Park Road and Old McKinley Park have condoms, injection needles, broken crack pipes and broken alcohol bottles on the street where I walk my dogs. The sidewalks are not maintained by the city, and is barely walkable. There is suspicious activity coming and going to the 8-plex on Upper Park Road. Many of the city sewer connections are concrete or terra cotta from the 1930's and earlier. Many of our streets on East 29<sup>th</sup> and L street do not have sidewalks. None of the roads in our neighborhood are sanded during the winter months, but many in North Tacoma are. Our nearest grocery store is 4 miles away.

The East Tacoma neighborhood has received very little support with these issues in the past 2 decades. We understand that bringing in townhomes, condominiums and affordable housing will increase the property values in an area, which raises the tax base. We understand that schools receive funding based on their local zip code's taxes, and to have a better community, we need higher value homes, we're merely requesting that the infrastructure be in place before building any of these properties. The city of

Tacoma has Roger's Elementary School near East "L" street, which has been vacant since the 1990's. The McKinley Elementary School, which is being utilized as the Mary Lion Elementary School is a building in need of repair or demolishing, and Gault Middle School is vacant as well. There is a park across the street from Gault Middle School that is vacant and not in use. There are plenty of vacant pieces of land, owned by the city, that could be sold too. The purchase of these properties by private contractors and land developers will infuse the school district with much needed revenue. We're asking the city of Tacoma Planning Commission to conduct an analysis of these properties in the area before allowing 60 foot buildings smack dab in the middle of our view.

Our community is trapped in a grid lock every time the Tacoma Dome has an event. East "D" Street is clogged with 200 vehicles trailing from highway 705 through the Tacoma Dome parking lot. East "L" Street bridge over I-5 is deconstructed right now, so the only way residents can access their homes is to go clear to Pacific Avenue and East on 34<sup>th</sup> Street, or down to Portland Avenue, across I-5 Interchange traffic, and up to 38<sup>th</sup> street, over to McKinley Avenue, and down to their homes. We're asking the City of Tacoma Planning Commission to conduct an analysis of traffic considerations before allowing buildings to go in.

Many of the "Affordable Housing" multi-plexes on Upper Park Road, McKinley Avenue, and West to Pacific Avenue have "Partial View" rental units, which rent between \$1800- \$2300 per month. Is the term "affordable" specifically defined?

Your proposal also says affordable housing. The rent for these units will rent for \$1800.00 to \$2500.00 per month do to the location and view. This money only helps the owners of the apartment complexes it does not bring any money into our community.

On a personal note I have lived in my house, 1011 East 30th Street for 54 years. I have been blessed to enjoy the many transitions this neighborhood has gone through. My intent with this house is to leave to my granddaughter when I pass which will make for the Fifth generation of my family to live in this home. My father rebuilt this home. I inherited the home when he passed away. My husband and I have struggled in 38 years to keep our house. We have bought a second property on our street as an investment and to use the rent to subsidize our retirement income. One of the main reasons we invested here was due to the zoning, and be able to keep the view property for our tenants. We have built specific items to accent our property which reflect the view we have of the Tacoma Dome. Our properties have awesome views and your proposal will block our views in their entirety and diminish the quality of our neighborhood.

Sincerely,

Delores Anderson  
Community member and proud Citizen of East Tacoma  
1011 East 30<sup>th</sup> Street  
Tacoma, WA 98404  
(253)279-1977

**RECEIVED****MAY 17 2019**

The Mayor/Council Office

**MICHAEL LIND LAW OFFICE**

3124 E. Valleyview Terrace

Tacoma, WA 98404

Ph. 253.224.7590

Fx. 253.627.4087

e-mail: Michael\_Lind\_911@msn.com

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May 17, 2019

City of Tacoma  
Planning Commission  
Attn: Ms. Catherine Ushka  
747 Market Street, Room 349  
Tacoma, WA 98402

Fx: 253.591.5123

SUBJ: Proposed Rezoning: R-4 Multi-family Housing for E L St & E 29<sup>th</sup> St.

Dear Ms. Ushka:

My name is Michael Lind and I am writing to you because I disagree with your proposed zoning district: R-4 multi-family (high density) housing for E L St & E 29<sup>th</sup> St. My first and main point of contention is that View Sensitive Overlay is not being applied to East Tacoma. How is it that if North Tacoma has View Sensitive District Overlay, yet East Tacoma, still part of the city of Tacoma, it doesn't apply? There should not be any development allowed to exceed 25 feet in height to protect homeowners' property value.

Second, at no point did I receive notice of this proposal. Why should I have been provided notice of this proposal? Because this proposal directly impacts my view and decreases my property value. Notice was not placed in the planned location for residents to be made aware of the proposal. Notice was not sent to each resident that this planned development would impact.

Third, you intend to build multi-family housing in an area that devalues the property of nearly all the families that live in the neighborhood. This "Class" of people have collective rights against the government devaluing their property. Are you telling me that there is no other location for this project? If your answer is no, then it becomes very clear that this is more about a developer wanting to build water view properties at the expense of those who already have the view. On February 23, 2017 Candice Ruud quoted you in her article, "Tacoma School Board president will run for City Council on the East Side":

SUBJ: Proposed Rezoning: R-4 Multi-family Housing for E L St & E 29<sup>th</sup> St.  
DATE: May 17, 2019  
PAGE: Two

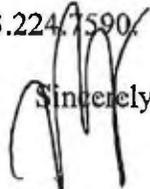
"We deserve safe neighborhoods, career-level jobs, and a high quality of life in Tacoma's East Side and South End," Ushka said in a news release announcing her candidacy. "I have proven my ability to lead collaboratively and get results as a director of Tacoma's public schools and I am running to bring that innovation to Tacoma city hall."

This proposal is your idea of safe neighborhoods and high quality of life? This is how you lead? You aren't bringing the high quality of life to the current residents of East Tacoma, you're bringing it to the potential wealthy buyers who like yourself, said "No, there is no other place for this development." You don't represent me. I'm pretty sure that the property values will decline for the many already here to the extent that the few who benefit from your project will not be able to make up for the loss in revenue. That does not increase the quality of life. For anyone.

Lastly, my wife and I have chosen to live in this neighborhood for 18 years because of the view. We have spent over \$100,00.00 upgrading our home and property because we decided early on that this house would be our last home we would ever own. Now, you intend to take that away from us. Not just us, but from the "Class" of us homeowners that enjoy the water view. I can't think of a worse way to manage growth for the City of Tacoma and its residents. In case you didn't know this, but from a business standpoint, you should not try to erode your tax base and decrease home values from the many for the potential few who don't even exist.

Thank you. I can be reached at 253.224.7590.

Sincerely,



Michael S. Lind  
Attorney at Law

MARY CHAMBERS LITTLE  
6638/6640 SOUTH ALASKA STREET  
TACOMA WASHINGTON 98408  
253-432-1077  
[maryevergreen47@gmail.com](mailto:maryevergreen47@gmail.com)

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April 29, 2019

To: City of Tacoma Planning Commission

Re: May 1, 2019 PUBLIC HEARING/ FUTURE LAND USE IMPLEMENTATION AND AREA WIDE REZONES

To Whom It May Concern:

My name is Mary Chambers Little. I am one of eleven heirs to the property located at 6638/6640 South Alaska Street. This 3.7 acre of property has been our single family home for over 68 years, but it no longer benefits anyone as a single family residence.

I am here to request a rezone to either R-4 or R-4L in accordance to your City Of Tacoma Comprehensive Plan of 2013. As many of you City Planners know, we have been seeking this change since our Mother passed in 2016.

We ask that this rezone be done this year and that you consider us as a separate entity from some of the contentious issues occurring at 72<sup>nd</sup> and Alaska Street.

Our request fits perfectly with this 2019 Comprehensive Plan and Land Use Regulations Amendment wherein "this phase of the project is intended to primarily address areas planned for multi-family residential development."

There is a wise saying that "Change is certain, progress is not." We feel this progressive change would benefit the entire neighborhood, and in particular Wapato Park and the people of all ages who use the facilities at the Park. Furthermore, the development of our property once rezoned could coincide with some of the future plans for Wapato Park's development as Tacoma's "Green Lake District."

Thank You,

Mary Chambers Little



MARY CHAMBERS LITTLE  
6638/6640 SOUTH ALASKA STREET  
TACOMA, WASHINGTON 98408  
253-432-1077  
[maryevergreen47@gmail.com](mailto:maryevergreen47@gmail.com)

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May 14, 2019

FLUM/REZONES  
Planning Commission  
747 Market Street  
Room 349  
Tacoma, WA 98402

Dear Planners:

My name is Mary Chambers Little. I live at the above address. My siblings and I are seeking a rezone for our property and we are asking that this be done in 2019.

Although our project may not be on the impressive scale of the major planning initiatives from 2018 such as the subarea plan for the Tacoma Mall Neighborhood, or the interpretive elements along the Prairie Line Trail in Downtown, or the partnership that the City formed with the University of Washington Livable City Program, allowing a rezone on our property could positively affect many future plans that the City has for the Wapato Lake area.

In particular, by allowing multi-family units the City would be increasing the number of persons who live within walking distance not only to the Park but to the many amenities close at hand. They could enjoy it with their families and use the future event features that are projected with the growth of Wapato Lake as a counterpart to Seattle's Green Lake District. It is our hope that Metropolitan Park District will work with a developer to reopen the area of Wapato Lake just across from our land for an entrance into the Park. Our family shares many wonderful memories of running down those paths. It's time for other people to make new memories. This will also discourage unwanted and illegal use of the Park.

We ask the City Planners to consider what other property in the Wapato Lake area might be able to fulfill the needs of so many, located so ideally, in middle of such diversity, and with so much access to neighborhood amenities working towards health, equity, and sustainability? We are the last piece of land of any size that could be used to be of service to so many. Unique!

Here's a shocking idea: a place without cars! There are so many amenities within walking distance that it's like the old-time neighborhood that I remember as a child where we walked everywhere. There's a 12 foot wide sidewalk down Alaska Street that's comfortably wide enough for wheelchairs. Your best friend is your dog? (whose isn't) Walk your dog down to the Park to join his buddies at the dog park. If you have children, there's playground for them. If you like to bar-b-que, there are picnic areas. You need groceries? Walk next door to Winco. You want to go out to a restaurant? What kind of food do you like?. You want to work out to stay fit? Walk next door to the gym. You need a cup of coffee? Starbuck's next door. You want to have a few drinks after a hard day at the office but you don't want to drink and

drive? Walk next door and stagger back if you want. Looking for a job? What kind do you want? You need to go to an appointment? The bus stops in front. You have relatives coming for holidays and need a place to put them up? There are all kinds of motels a few blocks away. You have an accident? There's a fire department down Alaska Street or there's a police sub-station in Wapato Park. Need schools for your children or yourself? There are schools for everyone.

This future development could also include affordable housing in response to the changing housing market and provide high-quality, affordable housing opportunities for all.

Traffic has increased everywhere in Tacoma and it is to be expected since we are growing so rapidly. The "traffic problem" on Alaska Street seems to be with the folks who live close to 72<sup>nd</sup> Street, particularly during rush hours on 72<sup>nd</sup> Street when people are in a hurry to get to work or to get home. The opening of the Winco gate off Alaska Street has caused even more traffic for them. We have never had a problem with the traffic in either getting into or getting out of our property. My one suggestion for any future developer would that everyone leaving this property at rush hour would have to turn left and then they would not impact the folks at 72<sup>nd</sup> street.

Our family is seeking an equitable solution to the future development of our property. Over the years, the environment around us has changed so dramatically. We are not an island so we have been changed too. We see this multi-family development as the possible "heart" of this area. Presently, we are surrounded by so much diversity: on our South side we are overwhelmed by the shopping center; our West side is never ending stream of traffic and noise from I-5; our north side is being reconfigured at the writing of this, and to our East is Wapato Park. The nearest single-family house is almost 3 football fields length away until the future development of property just to our south. This property could be developed to bring continuity to this area.

Thank you,



Mary Chambers Little

CC: STEPHEN ATKINSON; Principal Planner  
BRIAN BOUDET, Planning Manager  
ELLIOT BARNETT, Senior Planner  
MESA SHERIFF, Senior Planner  
LIHUANG WUNG, Senior Planner  
LARRY HARALA, Associate Planner

**Mr. and Mrs. Ronald D. Lunceford**  
**7664 19<sup>th</sup> Street West**  
**Tacoma, WA 98466**

April 26, 2018

TO: City of Tacoma  
Tacoma Planning Commission  
747 Market Street #345  
Tacoma, WA 98402

RE: Future land use and area-wide rezones. Hearing scheduled for 5/1/2019  
FLUM/REZONES

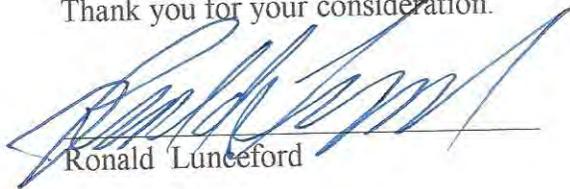
Dear Planning Commission Members,

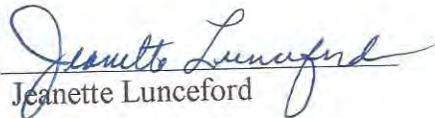
We own the single-family home located at 5410 Tacoma Mall Blvd, (Tax ID #232000-187-0). Its current zoning is R2. The parcel runs from "street to street", fronting on Tacoma Mall Blvd on its Eastern border with Railroad Street on its Western border. The overall environment for this property is decidedly not residential. For example, our property sits directly across the street from a Shell Gas Station/Convenience Store at 5407 Tacoma Mall Blvd that is open 24 hrs/day, 365 days/year.

As can be seen on the attached map, S. 54th Street, Railroad Street and Tacoma Mall Blvd create a sort of triangle shaped "island", effectively isolating the properties in this triangle from single-family homes abutting S. 54th Street and Railroad Street. One of the properties located in this triangle shaped section of land appears to have been an automotive repair business at some time in the past (2103 Railroad Street, Tax ID# 232000-184-0).

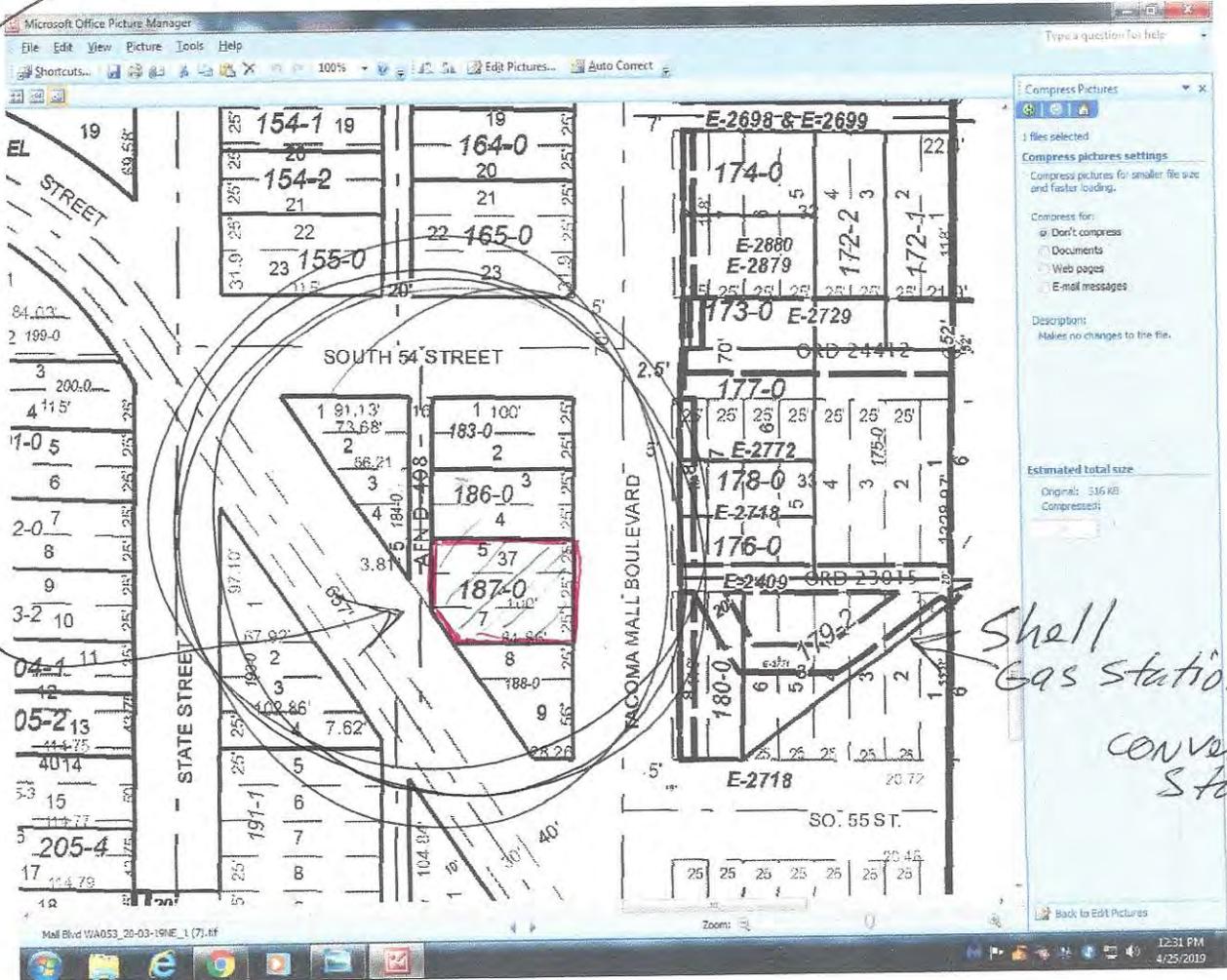
We want to encourage the planning commission to seriously consider a rezoning of our property and those abutting it. The current R2 zoning is far below its highest and best and most appropriate use.

Thank you for your consideration.

  
Ronald Lunceford

  
Jeanette Lunceford

5410 Tacoma Mall Blvd TAX ID # 232000-187-0



Shell Gas station /  
Convenience Store

May 17, 2019

Planning Commission of Tacoma  
747 Market St., Rm 345  
Tacoma, WA 98402

Dear Ladies and Gentlemen of the Planning Commission,

I am writing to support LEAVING the height restriction of the Eastside McKinley residential district overlooking Commencement Bay at 35 feet. Please preserve this neighborhood hilltop for low density multi-family use. Building a 60 foot six-story building would adversely affect the following:

1. Existing property owners that purchased affordable view property in the hopes of raising a family in the local neighborhood or retiring to a lovely neighborhood will have their property value destroyed.

2. The traffic pattern as higher densities of commuters race down the streets to catch their commuter buses will adversely impact the safety of the neighborhood.

A quiet neighborhood street such as South K Street would be converted to a crowded arterial. This would destroy the peace of the neighborhood as well as becoming dangerous for children and seniors walking to the nearby park. We have experienced this already in the Proctor and Alder Street neighborhoods. Please do not repeat this mistake!

3. A multi-story view condo or apartment would not only destroy the value of the current homeowners' property, but would soon become unaffordable, just as it has in the Stadium District. The high-rises in the Stadium District were originally supposed to provide affordable senior housing and shopping. They do so no longer. They are lovely, but they are very expensive.

I am for affordable multi-family housing. I propose building townhouses, duplexes, or two-story apartment complexes at the top of the hill within the 35 ft height restriction, and creating the 60 ft to 120 ft buildings zones in the valley at the bottom of the hill, within easy walking or bus routes to the transit station, restaurants, and amenities. Leave the residential areas as viable quiet neighborhoods with vibrant bus lines to connecting them with the transit station.

As we build affordable housing let us do so with innovative urban planning. I propose we build multi-family homes, apartments, or townhomes around village greens or Commons. We all thrive when we know each other and can create a neighborhood. Both children and seniors do better when housed in areas where they can play and socialize. High-rise living is very isolating for those who no longer work and cannot afford the luxury of tennis and golf clubs, or even simple transportation! Multiple studies have shown that loneliness is the new smoking, with adverse health benefits on both young and old. I believe that we can do both!

Let us build the high-rises in the valleys and leave the districts on the hilltop as AFFORDABLE NEIGHBORHOODS for young and old couples who can wish to rent or buy their first house, duplex or townhouse AND safely walk their kids to school or the park.

Let's create buildings that are conducive to Community, not just Commuting!

Sincerely,

Leslie S. Malo, M.D.

Nick Malo  
2919 E K St  
Tacoma, WA  
May 17, 2019

Dear Tacoma Planning Commission and Members of the Tacoma City Council:

I am writing to strongly urge you to reconsider the proposed rezoning of the Strawberry Hill neighborhood in Eastside Tacoma (E L St & E 29<sup>th</sup> St) from a Multi-Family Low Density zoning district to a Multi-Family High Density zoning district as currently proposed in the “2019 Comprehensive Plan and Land Use Regulation Amendments – Future Land Use Implementation and Area-Wide Rezones” and to express my concerns on the broader execution of such changes throughout Tacoma. The concerns I will outline below will not only detail the inappropriateness of the currently proposed rezoning of E L St & E 29<sup>th</sup> St, but will also highlight critical deficiencies in the implementation of such amendments.

First, I’d like to tell you a bit about myself and circumstances as it relates to these proposed changes. I believe my experience and the fact pattern surrounding that experience highlight important areas of impact that I do not believe have been fully considered. I grew up in Tacoma and have always loved my hometown. So much so in fact, that in May 2018 my girlfriend and I bought our first home in the Strawberry Hill neighborhood. We were immediately drawn to the quaint neighborhood, the diverse mix of new and old neighborhood families, the mid-century architecture styles throughout, and the immaculate panoramic views overlooking Downtown Tacoma and stretching across the Olympic Mountain range, Commencement Bay, and the Cascades (*See [Appendix 7](#) to see the views I speak of*).

Cognizant that our prospective home’s property value was tied to its unobstructed views, we consulted an attorney and were informed that the surrounding properties were a combination of Single- & Multi-Family Low Density zoning districts, which have a maximum building height of 35 feet. Having done our due diligence we moved forward with purchasing our current home, confident in our understanding of our circumstance. For me, this was a dream actualized.

However, on April 30, 2019 we received notice of the Area-Wide Rezones that would affect our home. Specifically, the proposed amendments would rezone the surrounding properties to Multi-Family High Density (R-4) zone that would allow for buildings up to 60 feet in height.

**The currently proposed rezone for E L St & E 29<sup>th</sup> St will fundamentally change the neighborhood of Strawberry Hill at the expense of current and future property owners.**

**Inappropriate Proposed Rezone of E L St & E 29<sup>th</sup> St** – According to the City of Tacoma’s Land Use Designation Table, an R-4 zone is, “characterized by taller buildings, higher traffic volumes, reduced setbacks, limited private yard space, and greater noise levels. These areas are generally found in the central city and along major transportation corridors where there is increased access to public transportation and to employment centers”.<sup>1</sup> In addition, the applicable policies section of the “Comprehensive Plan and Land Use Regulatory Code Proposed Amendments for 2019 – Public Review Document”<sup>2</sup> lists the “One Tacoma Plan Book – Urban Form”<sup>3</sup> Policy UF-1.3, “Promote the development of compact, complete and connected neighborhoods where residents have easy, convenient access to many of the places and services they use daily including grocery stores, restaurants, schools and parks, that support a variety of transportation options, and which are characterized by a vibrant mix of commercial and residential uses within an easy walk of home.” The Strawberry Hill neighborhood meets next to none of these qualities.

Strawberry Hill is a quiet neighborhood containing small, suburban streets, low traffic volumes and is primarily comprised of single family dwellings. In fact, the proposed rezoned areas were previously single/two family dwelling zones. There are few

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<sup>1</sup> [City of Tacoma’s Land Use Designation Table](#)

<sup>2</sup> [Comprehensive Plan And Land Use Regulatory Code Proposed Amendments for 2019 – Public Review Document](#)

<sup>3</sup> [One Tacoma Plan Book – Urban Form](#)

walkable amenities. Walkscore.com rates this neighborhood’s “Walk Score” as 41/100, considering it, “Car Dependent – Most errands require a car” (See [Appendix 1](#) for Walkscore.com summary).<sup>4</sup> Here are a few from data points from Google Maps regarding the proximity to some of the features mentioned to Strawberry Hill:

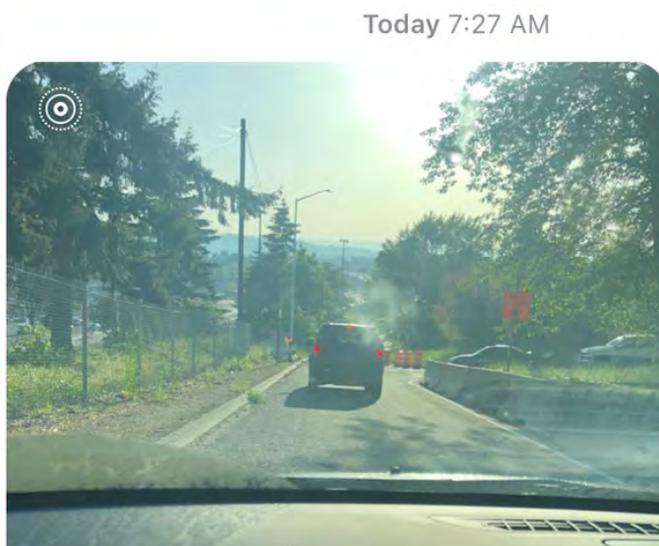
- Taking public transit to Downtown Tacoma at 9am on a typical Monday morning requires a 28 minute commute that includes a 12 minute downhill/uphill walk to the nearest bus station.<sup>5</sup>
- The closest grocery store (38<sup>th</sup> St Safeway) would require a 52 minute walk.<sup>6</sup>
- The closest restaurant (Top of Tacoma Bar & Café) would require a 13 minute walk.<sup>7</sup>

For most practical purposes, a car is the most reasonable option. However, the surrounding neighborhoods are made up of small residential access roads that are poorly maintained (you will note that no snow plow was able access our neighborhood during the recent 2019 snow storm) and many of the current houses require use of the limited on-street parking space. Yet despite the current need to use on-street parking, the proposed rezoning to R4 would actually lower the minimum required off-street parking to 1.25 spaces from 1.50 while allowing for increased population density in the same area (See [Figure 1](#)).<sup>8</sup>

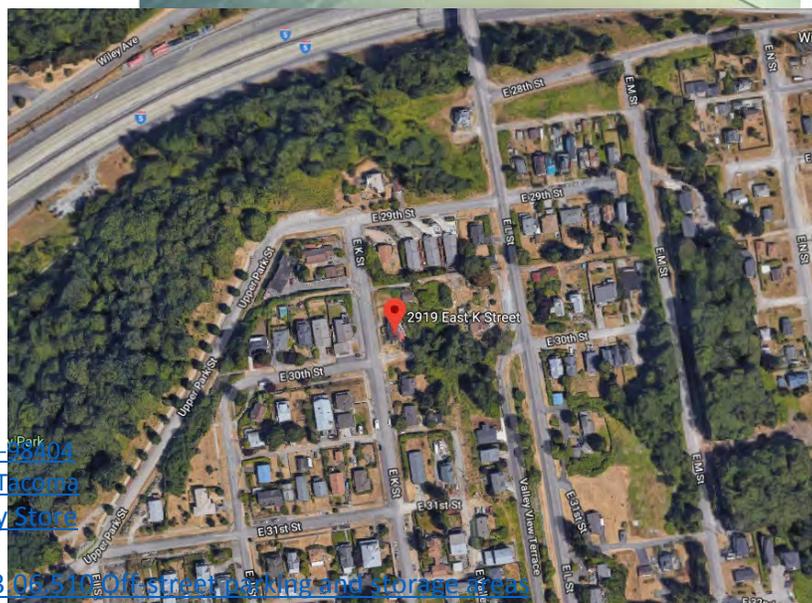
Group housing – 7 or more residents <sup>1, 16</sup>	Room, suite or dwelling	1.00
Small Lots, Cottage Housing and lots not conforming to area width <sup>3</sup>	Dwelling	1.00
Mobile home park <sup>1, 2, 12</sup>		
Multiple-family dwelling <sup>1, 2, 12, 16</sup>		
Located in R-4-L, T, HMR-SRD, and PRD Districts <sup>12</sup>	Dwelling	1.50
Located in R-4, C-1, C-2, HM, and M-1 Districts <sup>12</sup>	Dwelling	1.25
Located in R-5 District <sup>12</sup>	Dwelling	1.00

Figure 1 - City of Tacoma - Title13 - LandUseRegulatoryCode - 13.06.510 Off-street parking and storage areas

In addition, E 28<sup>th</sup> St holds a main access point to I-5. The E 28<sup>th</sup> St I-5 access point already struggles to funnel morning commuters from the small, residential, Eastside neighborhoods and typically suffers heavy congestion up through E L St during morning commute hours (See [Figure 2](#)). Yet all of the directly surrounding areas to this access point are currently comprised of small residential neighborhood streets (See [Figure 3](#)) and make up relatively low traffic volume. Therein lies the problem, the local streets all consolidate into one access point to I-5 that consists of a narrow one lane road and is currently only sustainable due to those relatively low traffic volumes. However, the surrounding neighborhoods and streets, function fine separately as the primary usage is for local resident access. Without addressing this current bottleneck, a proposal that introduces increased density into this same concentrated area will only further advance this problem.



The City of Tacoma’s Land Use Designation Table describes Single Family Residential Zones as, “Qualities associated with single-family residential designations that are desirable include: low noise levels, limited traffic, large setbacks, private yards, small scale buildings, and low-density development. Community facilities, such as parks, schools, day cares, and religious facilities are also desirable components of residential neighborhoods. Limited allowances for other types of residential



<sup>4</sup> <https://www.walkscore.com/score/2919-e-k-st-tacoma-wa-98404>  
<sup>5</sup> [Google Maps - Strawberry Hill Public Transit to Downtown Tacoma](#)  
<sup>6</sup> [Google Maps - Strawberry Hill Walk to Closest Grocery Store](#)  
<sup>7</sup> [Google Maps - Strawberry Hill Walk to Closest Restaurant](#)  
<sup>8</sup> [City of Tacoma - Title13 - LandUseRegulatoryCode - 13.06.510 Off-street parking and storage areas](#)

development are also provided for in the single family designation with additional review to ensure compatibility with the desired, overarching single-family character. In some instances, such as the HMR-SRD, areas designated for single family residential development have an historic mix of residential densities and housing types which should be maintained while allowing for continued expansion of housing options consistent with the single family designation.” and describes Multi-Family (Low Density) zones as, “This district enjoys many of the same qualities as single-family neighborhoods such as low traffic volumes and noise, larger setbacks, and small-scale development, while allowing for multi-family uses and increased density along with community facilities and institutions. The Multi-Family (low-density) district can often act as a transition between the single-family designation and the greater density and higher intensity uses that can be found in the Multi-Family (high density designation) or commercial or mixed use designations. This designation is more transit-supportive than the Single Family Residential areas and is appropriate along transit routes and within walking distance of transit station areas.”

The City of Tacoma’s Municipal Code Title 13 - Land Use Regulatory Code describes R-4L zones as, “intended primarily for low-density multiple-family housing, mobile home parks, retirement homes and group living facilities. It is similar to the R-4 Multiple-Family Dwelling District, but **more restrictive site development standards are intended to minimize adverse impacts of permitted and conditional uses on adjoining land. The district is characterized by amenities and services associated with single- and two-family residential districts**, and it is located generally along major

*Figure 3 - E 28<sup>th</sup> St surrounding residential neighborhoods and streets*

transportation corridors and between higher and lower intensity uses.”<sup>9</sup> Title 13 describes R-1/R-2 (Single-Family Dwelling Districts) as, “This district is intended for low-density, single-family detached housing. Other compatible uses such as residential care homes and shelters are also appropriate. **The district is characterized by low residential traffic volumes and properties located within the View Sensitive Overlay district. It is most appropriate in areas with steep topography or an established pattern of larger lots.**”

To summarize, the neighborhood sits atop a hill with an elevation that varies between 200 – 300 feet above sea level according to the U.S Geological Survey’s National Map<sup>10</sup> (i.e., it’s steep), and has low noise levels due to that hill, elevation, and the surrounding forest area in McKinley Park. It has limited traffic due to local access roads that are primarily used for neighborhood residents, has large setbacks, and the houses consistently own private yards.

Furthermore, the currently proposed rezones directly contradict Tacoma’s Land Use Codes. As previously mentioned, the Strawberry Hill neighborhood currently shares scenic views of the Puget Sound that directly influence the value of neighborhood properties. Allowing for a 60 foot building to be developed and block those views for the rest of the neighborhood would have a significant financial impact to those properties’ values and owners; property owners who consciously invested in a small family residential neighborhood – not a high density, massive building community. The proposal to rezone this area to R-4 (High Density) is completely disregarding the “minimize adverse impacts of permitted and conditional uses on adjoining land” element described in R-4 (Low Density) and is instead directly seeking to adversely impact adjoining land. In one instance you have residents such as myself who have recently purchased property in this neighborhood due to misleading information in the current Tacoma Land Use Code and Zoning Designations, while on the other end of the spectrum you have home owners who have resided in this neighborhood for decades and are deserving of reasonable confidence in the value of their property; in particularly, when such property value directly relates to their nest egg and retirement plans.

The characteristics of Strawberry Hill are significantly more aligned with Single Family and Multi-Family Low Density zoning descriptions. The neighborhood has been structured this way since the early 1900s (e.g., my house was built in 1938) and has continuously grown with this overarching character. Any proposed rezoning should reflect and preserve these characteristics as they have organically grown to be, rather than forcibly recomposing a historic neighborhood to something it never remotely resemble. Such drastic, sweeping changes not only eliminates a historic area but also compromises the current and future character of Tacoma as we address continuing growth.

<sup>9</sup> [City of Tacoma - Title13 - LandUseRegulatoryCode](#)

<sup>10</sup> <https://nationalmap.gov/epqs/>

**Critical Amendment Implementation Deficiencies** – In researching these amendment proposals and their impact, I found several areas that were particularly concerning. In my research, I have found several consistent themes in the code and polices maintained in the Revised Code of Washington (RCW), Tacoma Municipal Code (TMC), and the One Tacoma Plan (OTP). These themes are:

1. Equitability
2. Public Engagement & Participation
3. Consistency

These concepts are referenced pervasively throughout legislation and policy, both directly and indirectly. Refer to [Appendix 2](#) for excerpts that highlight the extent to which these themes are referenced as explicit requirements and priorities.

**Is it Equitable?** By my count, there are 81 distinct rezones/amendments<sup>11</sup> affecting the 8 districts of Tacoma. Based on the most recent US census data, the bottom 3 districts in terms of Median Home Value, Median Household Income, Percent of Persons Below Poverty, and Percent Unemployment (New Tacoma, East Side, and South Tacoma - *See Figure 4 and Appendix 3 for further details*).<sup>12</sup>, comprise 43.2% of the total proposed changes and 50% of the higher density R4 re-zoning. Conversely, the top 3 districts for those same metrics (North East, North End, and West End), are the least impacted by the number of higher densification rezoning proposals comprising 28.4% of the total proposed changes and 35.7% of the higher density R4 re-zoning. The data shows that collectively the bottom 3 districts are the most affected by the proposed changes, in particularly in terms of higher density rezoning.

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<sup>11</sup> **Note:** There are in fact 78 proposed rezone areas held within the “Comprehensive Plan and Land Use Regulatory Code Proposed Amendments for 2019 – Public Review Document”. However, three areas overlap two districts, so I have distinguished these a distinct rezones for the purposes of comparing rezoning across Tacoma districts.

<sup>12</sup> **Note:** To provide consist comparison, I provided the average ranking by district for these four metrics. New Tacoma is actually 4<sup>th</sup> in Median Home Value, yet is 8<sup>th</sup> in the remaining three metrics, and South End is actually 6<sup>th</sup> but is 4<sup>th</sup> in the remaining three metrics. In addition, South Tacoma and Central vary between 5<sup>th</sup> and 6<sup>th</sup> across Median Income, Percent Below Poverty, and Percent Unemployment.

#	Neighborhood Council District	Average Median Home Value	Average Median Household Income	Average Percent of Persons Below Poverty	Average Percent Unemployment	Number of FLUM Potential Area-wide Rezones	Percent of Total FLUM Potential Area-wide Rezones	Number of FLUM Potential Area-wide Rezones (R4-High Density)	Percent of Total FLUM Potential Area-wide Rezones (R4-High Density)
1	Citywide	\$ 256,630	\$ 49,452	18.73%	10.16%	81	100.00%	14	100.00%
2	North East	\$ 359,533	\$ 84,796	5.47%	5.93%	3	3.70%	0	0.00%
3	North End	\$ 351,860	\$ 69,340	8.18%	6.16%	10	12.35%	2	14.29%
4	West End	\$ 297,986	\$ 55,438	11.73%	7.31%	10	12.35%	3	21.43%
5	South End	\$ 206,189	\$ 47,067	16.72%	8.90%	9	11.11%	1	7.14%
6	Central	\$ 223,450	\$ 41,731	20.30%	13.05%	14	17.28%	1	7.14%
7	South Tacoma	\$ 201,960	\$ 42,314	21.98%	10.44%	23	28.40%	3	21.43%
8	Eastside	\$ 191,840	\$ 38,116	28.50%	13.66%	10	12.35%	3	21.43%
9	New Tacoma	\$ 278,560	\$ 28,926	36.36%	16.88%	2	2.47%	1	7.14%
10	Rank by District (1 Best - 8 Worst)								
11	North East	1	1	1	1	2	2	1	1
12	North End	2	2	2	2	5	5	5	5
13	West End	3	3	3	3	5	5	7	7
14	South End	6	4	4	4	3	3	3	3
15	Central	5	6	5	6	7	7	3	3
16	South Tacoma	7	5	6	5	8	8	7	7
17	Eastside	8	7	7	7	5	5	7	7
18	New Tacoma	4	8	8	8	1	1	3	3

Figure 4 - US Census 2010 Financial Demographic Metrics and FLUM Potential Rezones by Tacoma Council District

Curious as to the current composition of housing types throughout Tacoma, I reviewed Pierce County Assessor-Treasurer's Appraisal & Tax Property data by parcel<sup>13</sup> as well as the City of Tacoma's current land use zoning boundaries<sup>14</sup>. The results I found were of a similar theme as the proposed rezoning. The bottom 3 districts currently provide the majority of Tacoma's multi-family high density housing providing 94.66% of all Tacoma's high density residential parcels (New Tacoma 79.31%, East Side 6.18%, and South Tacoma 9.18% - See Figure 5 and Appendix 4 for further details). In fact, Eastside alone, as the 3<sup>rd</sup> highest high density housing provider, provides 15.70% more high density housing parcels than all of the remaining 5 districts combined.

Furthermore, these same districts have a disproportionately larger composition of high-density housing parcels compared to all the other districts of Tacoma. New Tacoma, East Side, and South Tacoma respectively use 70.33%, 1.41%, and 2.96% of their residential housing parcels for high density housing. For comparison, the remaining 5 districts use an average of 0.24% of their residential housing parcels for high density housing.

<sup>13</sup> <https://www.co.pierce.wa.us/736/Data-Downloads>

<sup>14</sup> <http://geohub.cityoftacoma.org/items/tacoma-zoning-data>

District	# of Parcels	Sum of Land Net Square Feet
Citywide	67,661	619,408,203

Housing Type - Single / Multi-Family / Vacant	# of Parcels	Sum of Land Net Square Feet	% of Total Tacoma Land by Parcel
Multi-Family	6,853	63,054,619	10.18%
Multi-Family (High Density)	2,267	60,810,584	9.82%
Single Family Dwelling	55,770	430,116,647	69.44%
Vacant	2,771	65,426,354	10.56%
<b>Grand Total</b>	<b>67,661</b>	<b>619,408,203</b>	<b>100.00%</b>

# District	Housing Type - Single / Multi-Family / Vacant	# of Parcels	Sum of Land Net Square Feet	% of Total District Parcels	% of Total District Parcels [District Rank]	% of Citywide Parcels by Housing Type	% of Citywide Parcels by Housing Type [District Rank]
<b>1 Multi-Family (High Density) Summary</b>							
2	North End	Multi-Family (High Density)	44	26,060	0.42%	5	1.94%
3	West End	Multi-Family (High Density)	73	430,809	0.76%	4	3.22%
4	Central	Multi-Family (High Density)	4	171,248	0.05%	6	0.18%
5	South Tacoma	Multi-Family (High Density)	208	4,159,867	2.96%	2	9.18%
6	Eastside	Multi-Family (High Density)	140	152,493	1.41%	3	6.18%
7	New Tacoma	Multi-Family (High Density)	1,798	55,870,107	69.18%	1	79.31%
8			<b>2,267</b>	<b>60,810,584</b>			

Figure 5 - Current Composition Tacoma Housing & Summary of Multi-Family (High Density) by District. Note: South End and North East districts are not shown in the above table as there were no parcels that reflected Multi-Family (High Density) housing.

While there is certainly an element of organic development that can unwittingly contribute to the disparity between where high density housing is developed, I also found that both the current zoning and the proposed rezoning showcase the same disparity. Figures 6 & 7 on the following page provide a visual highlight of this disparity. It is clear that the current housing composition and current zoning disproportionately concentrates high density housing into certain districts, particularly in districts of lesser affluence, and the proposed rezoning is consistent with that trend.

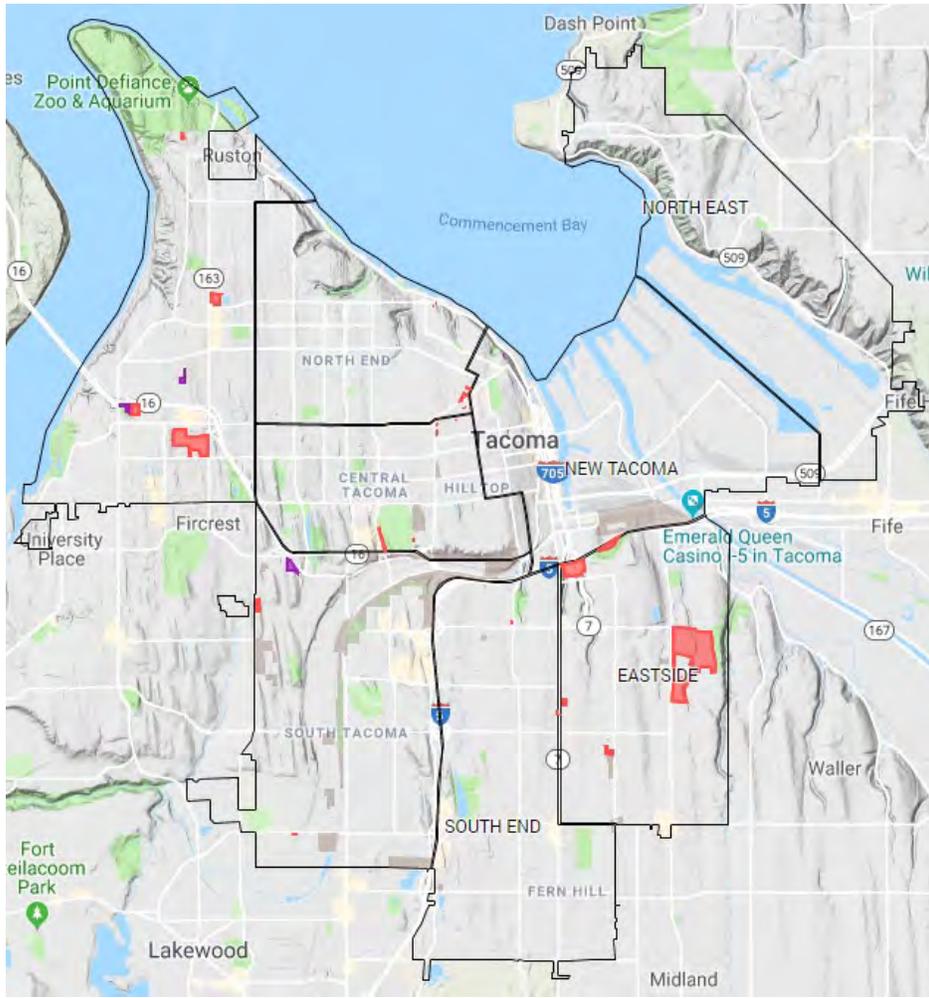
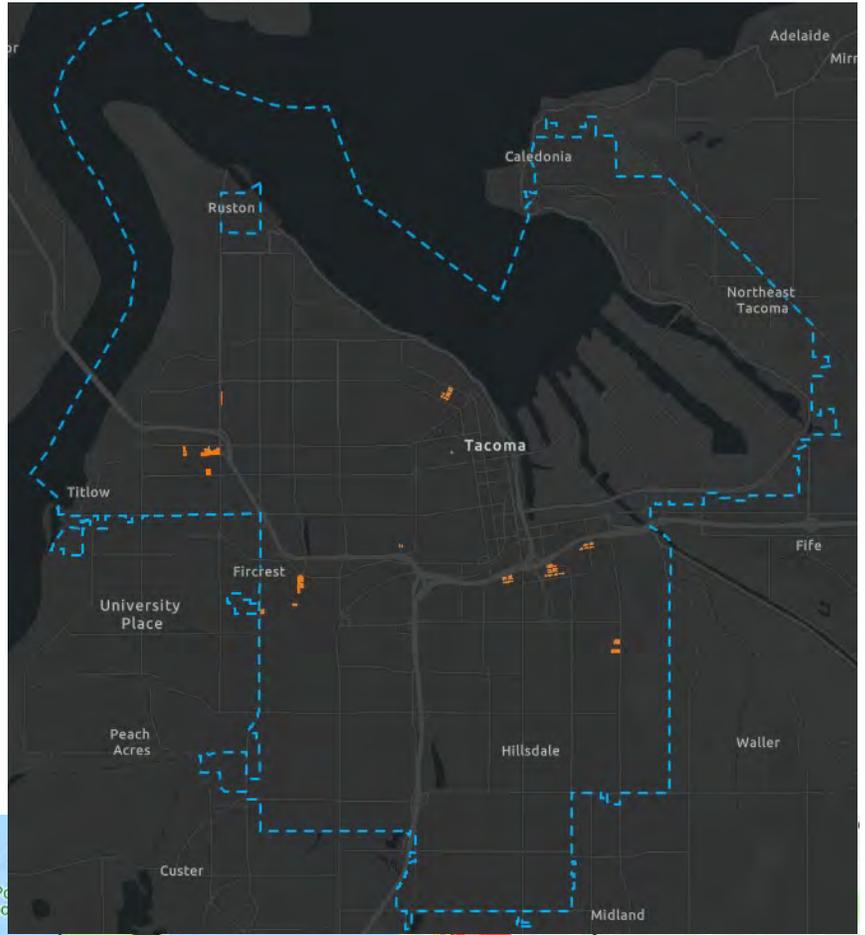


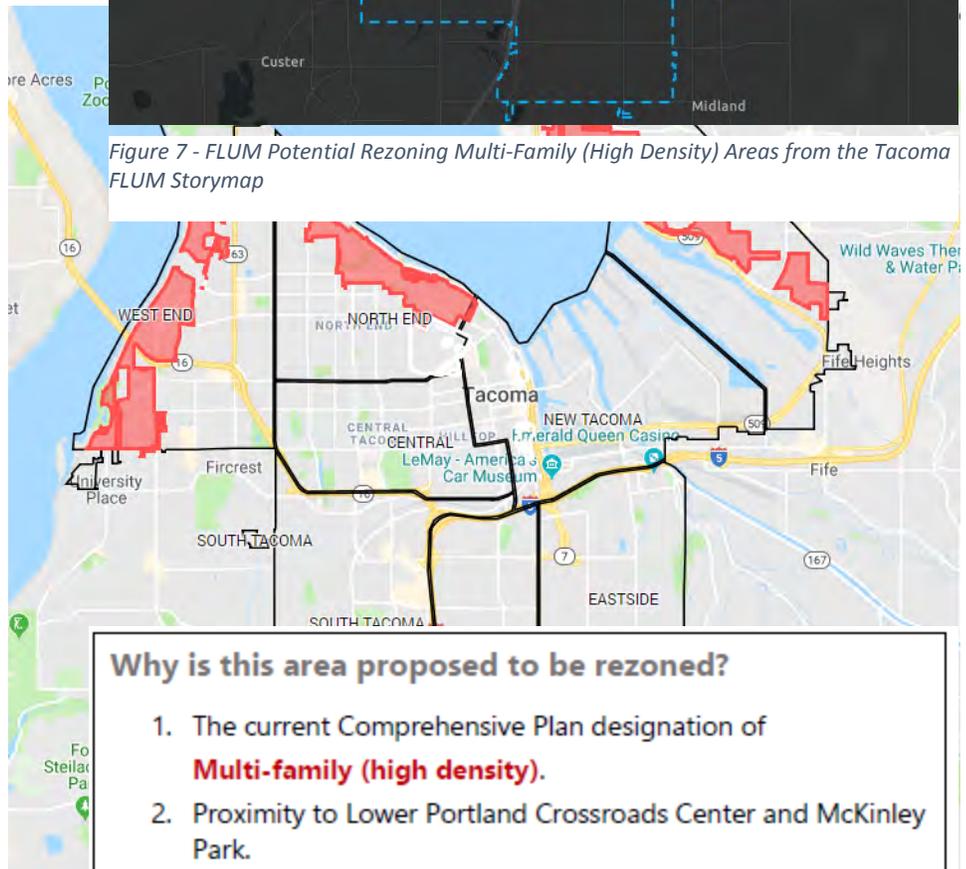
Figure 6 - Current Land Use Zoning Boundaries for Multi-Family High Density (R4 [red] & R5 [purple]))



Meanwhile, the top 3 districts are significantly less impacted by the number of higher densification rezoning proposals and have private property owner protections such as the View-Sensitive District Overlay that limits new developments to 25 ft in height – a **protection that has not been extended to districts such as the Eastside and South End that also hold property with views** (See Figure 8). It is distinctly unclear to me why such property protections are applicable to only the top 3 most affluent districts while private property owners in lower income/home value areas are not afforded such protections despite sharing similar views.

Even more egregious is the blatant disregard for this discrepancy in equal property protections. One of the answers addressing “Why is this area proposed to be rezoned?” for the proposed rezone in

Figure 7 - FLUM Potential Rezoning Multi-Family (High Density) Areas from the Tacoma FLUM Storymap



**Why is this area proposed to be rezoned?**

1. The current Comprehensive Plan designation of **Multi-family (high density)**.
2. Proximity to Lower Portland Crossroads Center and McKinley Park.

Figure 8 Figure 9 - Section II-A.3 Exhibits: Proposed R-4 Rezones (E. L and E. 29th St) of the “Comprehensive Plan and Land Use Regulatory Code Proposed Amendments for 2019 – Public Review Document”. See [Appendix 5](#) for a copy of the full exhibit for this area.

my neighborhood's E. L and E. 29<sup>th</sup> was noted as, ***"This area has view potential."*** (See Figure 9). The same reasoning was noted not only in the proposed rezone in my neighborhood but also for E. D and E. 32<sup>nd</sup> (Eastside) and S. Wright Ave and S. Fawcett (South End). Concurrently, two areas in North End Tacoma areas that were also originally designated for Multi-family High Density in the One Tacoma Plan have instead received a recommendation to amend the One Tacoma Plan due to recognition of these areas being in the View Sensitive Overlay District. The value of a view as it pertains to property value seems to be recognized for prospecting future property developments and for property owners in affluent Tacoma districts, but is treated as inconsequential for the current property owners in lower wealth districts.

The predominant goal of Tacoma's Comprehensive Plan seems to revolve around managing population growth while ensuring equitable access to diverse, affordable housing. In fact, the very first goal (Goal H-1) in the "One Tacoma Plan Book – Housing" states, "Promote access to high-quality affordable housing that accommodates Tacomans' needs, preferences, and financial capabilities in terms of different types, tenures, density, sizes, costs, and locations" and the next goal (Goal H-2) states, "Ensure equitable access to housing, making a special effort to remove disparities in housing access for people of color, low-income households, diverse household types, older adults, and households that include people with disabilities." However, the current trend and the current rezoning plan seem to center around transitioning to high densification and seem to contradict these goals by disproportionately concentrating that specific housing type primarily in areas of lower affluence. Such discrepancy in concentration is also acknowledge in the SEPA File Number: LU19-0068 Attachment A: Housing Impact Analysis of the Proposed Future Land Use Map Implementation<sup>15</sup>, which states, "In Tacoma, 83% of the City's buildable lands are in zoning categories that support high density mixed-use development. 10% of the City's buildable lands capacity is in single family zoning districts. The proposed area-wide rezones would shift 2.5% of the City's overall single-family zoned lands to a zoning classification that supports multi-family development. This shift would be experienced differently in different areas of the City. The largest shift would be in South Tacoma (7%) with the North End and North East Tacoma at less than 1%".

There is certainly an argument to be made that areas of less affluence would also have a greater need for affordable rental housing due to the upfront capital investment required for the down payment to purchase a home. However, therein lies one of the issues I have with this plan. The planned concentration of high density housing in less affluent areas indicates to me that addressing city-wide population growth through increased densification is a solution to be provided by the less affluent citizens of Tacoma and moreover, that affordable housing simply means affordable renting. Yet Eastside Tacoma has the lowest average home value (\$192K US 2010 Census; \$269K March 2019 Zillow<sup>16</sup> Home Value Index (ZHVI)) out of any of the other 8 districts (City Average: \$257K; \$336K March 2019 ZHVI), or simply put, it is the most affordable area in Tacoma to purchase a home. If we treat affordable housing as synonymous with high density rental communities, or more precisely, over-index on this housing type as the mechanism to affordable housing, we are compromising one of the most practical vehicles to financial stability in residential property ownership. In effect, we are reducing the most affordable housing options by disproportionately targeting these low income neighborhoods with high density housing and lowering the supply of affordable homes - to the benefit of commercial real estate developers.

Should we not ensure the most affordable residential housing areas in Tacoma, such as Eastside, also maintain a proportionate composition of affordable residential housing options for prospective home owners? If not, and we simply push these communities to high density rental properties, we create a self-fulfilling prophesy where the individuals in these communities can never leave the rental cycle because we create a barrier to entry for property ownership in concentrating expensive multi-million high density complexes in less affluent districts and limiting feasible ownership options where there otherwise would have been an the most affordable path to property ownership within these same districts.

We certainly need affordable rental options. However, I believe that affordable housing also encompasses protecting current homeowner's property value and ensuring proportionate composition of high density housing, particularly in lower

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<sup>15</sup>

[https://cms.cityoftacoma.org/Planning/2019%20Amendment/2019%20Amendment%20Public%20Review%20Document%20for%20PC%20Hearings%20\(May%201%20and%2015,%202019\).pdf](https://cms.cityoftacoma.org/Planning/2019%20Amendment/2019%20Amendment%20Public%20Review%20Document%20for%20PC%20Hearings%20(May%201%20and%2015,%202019).pdf)

<sup>16</sup> Value provided by the Zillow Home Value Index (ZHVI): A smoothed, seasonally adjusted measure of the median estimated home value across a given region and housing type. Data obtained from: <https://www.zillow.com/research/data/>

home value districts and not solely the most affluent districts. In the Future Land Use Implementation Application: 2019 Amendment, Section C Summary of Public Comments notes the following public comment, **“Notification and Engagement.** Notification has not been adequate. This project requires significant community engagement with the affected neighborhoods. **Response:** Staff concurs, but recognizes that these are proposed area-wide rezones, not site-specific rezones. Therefore, the review will be conducted at a broad level, not as an evaluation of the specific site characteristics of each parcel within this review.” An “area-wide” rezoning approach that doesn’t evaluate site specific changes is far too imprecise and comes at the expense of Tacoma residents. If we have a developed strategy that also includes precision in our rezoning implementation, we can offer high density rental options while minimizing impact to affordable small residential neighborhoods that serve an important role in providing the lowest barrier to entry to home ownership for Tacoma’s lower income residents.

However, I question whether the proposed rezoning to Strawberry Hill is at all aligned with theme of increased density to promote affordability. The affordability of lower density housing is actually noted in the “Comprehensive Plan and Land Use Regulatory Code Proposed Amendments for 2019 – Public Review Document” which states, “The zoning amendments are targeted to support **low to mid-density housing developments,** such as duplex, triplex, townhouses, and small multi-family projects that will increase the City’s housing affordability and will likely have a positive impact on naturally occurring affordable housing. **These types of units are typically available at a lower price point than traditional detached single family unit or new high density units.**” Furthermore, the fact that one of the Strawberry Hill area was targeted for rezoning due to having “view potential” seems completely contrary to any concept of affordable housing. The rezoning seems only intended to provide housing for future residents that can bear the inevitable rental premium of a 60 foot rental complex with a view – at the expense of all the current Strawberry Hill neighborhood property owners who would no longer have that same view despite paying a mortgage and property taxes.

For these reasons, I question whether the current plan has equitably spread out necessary densification and whether the underlying land use policies have been implemented fairly.

**Is the Public Engaged and Participating?** Despite the bottom 3 districts comprising the majority of proposed changes in this amendment at 43.2% of the total proposed, these same 3 districts amount to 10.2% of the total amount of public comments as of May 10, 2019. Their ratio of public comments to the number of rezone changes impacting these districts amounts to 1.6 comments for each proposed change. Meanwhile the top 3 districts amount to 74.9% of the total amount of public comments and have provided 4.4 comments for each proposed change. Refer to Figures 10 & 11 for further details.

#	Neighborhood	Council
1	Citywide	
2	North East	
3	North East	
4	West End	
5	South End	
6	Central	
7	South Tacoma	
8	Eastside	
9	New Tacoma	

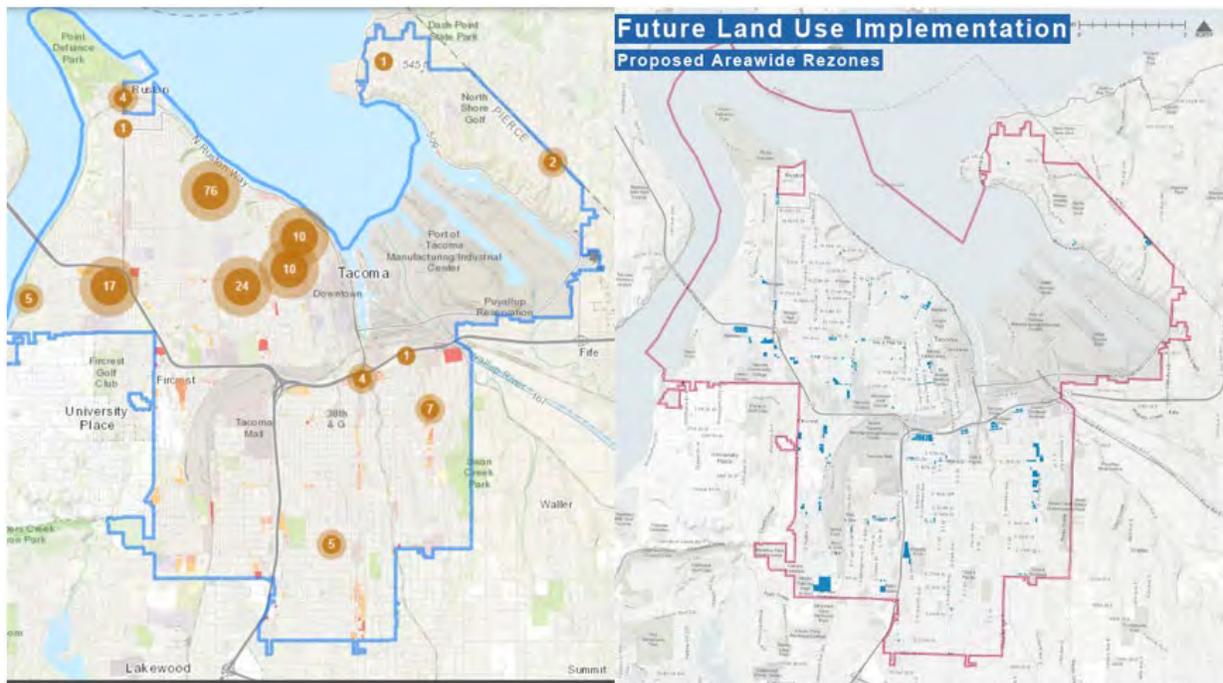


Figure 11 - Potential wide Rezone Comment as of May

FLUM Area-Public Analysis 10, 2019

Figure 10 - FLUM Potential Area-wide Rezones & Public Comment Map as of May 10, 2019

I personally received notification of the proposed rezoning in my neighborhood on April 30, 2019. Given that public comments to the Tacoma Planning Commission for the Comprehensive Plan and Land Use Regulatory Code Proposed Amendments for 2019 are due by May 17, 2019 at 5pm, I felt this was significantly insufficient notice. We began contacting the neighborhood to ensure they were aware of the proposed changes to Strawberry Hill and found that not a single property owner of the ~20 we spoke with directly were aware of these changes. **I find this to be completely unacceptable.**

I was curious how our neighborhood could have been left uninformed on something so impactful to our neighborhood, so I began researching how this information was disseminated. According to the City of Tacoma's "One Tacoma 2019 Amendment Public Engagement Plan"<sup>17</sup> initial communications were to begin with a public hearing between May and June 2018, outreach would continue through November 2018, and public hearings would commence on in February/March 2019 (See Figure 12). However, according to the

"Comprehensive Plan and Land Use Regulatory Code Proposed Amendments for 2019 – Public Review Document", outreach would actually continue through March 2019 and there would be five open houses concentrated in February and March 2019, and the Planning Commission public hearings would actually be conducted in May 2019 (See Figure 13). Based on the inconsistency

between these two documents, it appears that communication timelines were began to compress.

Given the reported timelines, I was still curious how we still never received notice of the changes, let alone notice to attend any of the previous public hearings/forums. So what exactly was the method for public outreach? According to the "One Tacoma 2019 Amendment Public Engagement Plan", the tools for notification were the website ([www.cityoftacoma.org](http://www.cityoftacoma.org)), the Planning Manager's Bi-Annual Letter, Listserv (an electronic mailing list), Taxpayer Notice (all taxpayers of record within an area proposed for a rezone or within 1000' of a proposed rezone

will be provided written notification of the Planning Commission and City Council public hearings), Media, Social Media, and a 60-Day Notice to the State. I see these mechanisms and all but the taxpayer notice require and media outlets require preemptive action from Tacoma residents, which seems contradictory to the term "outreach". The various means of communication also do not clarify when these communications were to be provided to Tacoma residents and how frequently, but from my experience my only notification arrived on April 30, 2019. However, I follow local media outlets on various social media channels and try to stay current on local news, so I still couldn't understand how I never knew. I searched various phrases of for these amendments into Google but came up with next to zero results, save one small article from Tacoma Weekly regarding a rezoning on 34<sup>th</sup> and Proctor (See Appendix 6 for images of various Google search combinations).

My next question was whether other residents and areas were able to engage in this process. According to the "Comprehensive Plan and Land Use Regulatory Code Proposed Amendments for 2019 – Public Review Document", the

### 2019 Amendment Process

The general timeline and schedule for the 2019 Amendment is as follows:

Timeline	Activity
May-June 2018	Planning Commission assessment and development of proposed 2019 Amendment package, including a Public Scoping Hearing on June 6, 2018
July 2018 – March 2019	Planning Commission and staff conducting technical analysis and outreach (including five open houses on February 21, February 25, February 27, March 13, and March 18)
May 1 and 15, 2019	Planning Commission Public Hearings
June 2019	Planning Commission making recommendations to the City Council
July-August 2019	City Council Actions (i.e., committee reviews, Council study sessions, Council public hearing, and Council adoption)

Figure 12 - City of Tacoma's One Tacoma 2019 Amendment Public Engagement Plan

### General Timeframe for the 2019 Amendments

May-June 2018	The Planning Commission reviews the proposed scope of work and assessment report; a public hearing is held to solicit public input on the proposed scope of work; the Commission finalizes the work plan.
July – November 2018	The Planning Commission considers the available options to address the issues. The Commission determines the specific options to develop for public review.  Staff conducts outreach efforts to solicit comments, feedback and suggestions from stakeholders, interested entities and the community
November – January 2018	The Planning Commission develop the proposed Plan and Code Amendment exhibits and staff conducts a technical analysis and staff report evaluating the proposals.
February/March 2019	The Planning Commission conducts a public hearing
April/May 2019	The Planning Commission makes recommendations to the City Council  Infrastructure, Planning and Sustainability Committee and other pertinent City Council standing committees review the proposed amendments
May 2019	City Council conducts a study session and a public hearing
June 2019	City Council considers adoption of amendments

Figure 13 - Comprehensive Plan and Land Use Regulatory Code Proposed Amendments for 2019 – Public Review Document - 2019 Amendment Process

<sup>17</sup> <https://cms.cityoftacoma.org/Planning/2019%20Public%20Engagement%20Plan.pdf>

Public Outreach and Engagement section states, “In support of the amendment, staff has held a series of public open houses in each City Council District. Over 22,000 taxpayer notices were sent to potentially affected parties, Facebook and other social media were utilized to advertise the events, and staff distributed digital communications, including a Manager’s Letter, broadly to interested parties. At this time, four of the five events have been completed. Approximately 250 people have attended these events and many other have communicated directly with staff. Comments provided to staff are available online at [www.cityoftacoma.org/flum](http://www.cityoftacoma.org/flum).” Out of the estimated 213,418 Tacoma residents, 22,000 taxpayer notices were sent out and 250 people were able to attend these open houses – amounting to a citywide participation rate of 0.12% and notified taxpayer participation rate of 1.14%.

According to the “One Tacoma 2019 Amendment Public Engagement Plan”, “Tacoma is committed to authentic public engagement and recognizes that the complexity and changing character of planning issues, technology and the city itself requires thoughtful innovation to ensure inclusive and equitable community engagement. Increasingly diverse demographics, as well as past failures to fully engage all members of the community, point to the need for new approaches to citizen engagement that promote inclusive participation. Changes in communication technology allow, and even require, the city to offer new avenues for engagement, and hopefully, collaboration. Finally, the city’s natural and built character and infrastructure are constantly evolving and continually require citizen input.” In review of the described fact pattern, I can only conclude that the communication program has been largely ineffective in achieving these goals and commitments. Furthermore, it appears to be a continuing trend.

How could this be allowed to continue? The same Public Engagement Plan states in its Public Involvement Evaluation section, “**Evaluation of the public involvement will be completed upon completion.** Tools for evaluation will include: Informal feedback from stakeholders, Short questionnaires following events, Planning Commission feedback following recommendation, and Team debriefs following meetings and events to discuss needed adjustments”. I would contend that a retrospective review after long-term decisions have already been made, is plan that does not allow for timely course correction and instead allows for failure.

What if a Tacoma resident doesn’t agree with past zoning decisions or the current proposal?

According to the “Plan and Code Amendments - Comprehensive Plan and Land Use Regulatory Code Amendment Process”<sup>18</sup> document, “A proposed amendment may be submitted by any private individual, organization, corporation, partnership, or entity of any kind including any member(s) of the Tacoma City Council or the Tacoma Planning Commission or governmental Commission or Committee, the City Manager, any neighborhood or community council or other neighborhood or special purpose group, department or office, agency, or official of the City of Tacoma, or any other general or special purpose government.” However, the following excerpt outlines a private citizens path to proposing an amendment, “**Application Fee – Is it refundable? Who may be exempted?** The **\$1,400 application fee** is authorized by the City Council, per Resolution No. 38588, adopted on December 18, 2012. It is intended to help offset part of the cost for processing and analyzing the application. **It is non-refundable.** The fee does not apply to (1) applications submitted by City of Tacoma general government departments, but does apply to utilities; (2) submissions by Neighborhood Councils or recognized Business Districts if formal written approval is submitted to the City by the duly elected Board of Directors; or (3) community groups that are involved in a planning study with the Planning and Development Services Department.” There has been much documented about the importance of public participation and equitable engagement, yet a private individual can only propose an amendment with a \$1,400 non-refundable application fee that may or may not amount to any change.

Based on this data, and the fact I myself received my notification on April 30, 2019, I question the efficacy of the current public engagement and whether the amount of participation is representative of the residents in these districts.

**Is it consistent?** Per the Washington State Growth Management Act and the Tacoma Municipal Code, the City’s Land Use Regulations, including zoning districts, should be consistent with the policies of the One Tacoma Plan. However, in many areas throughout the City current zoning is inconsistent with the Land Use Designation in the Future Land Use Map. P. 182 of the [Comprehensive Plan Proposed Amendments for 2018 – Public Review Document](#) regarding Code Cleanups of

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<sup>18</sup> <https://cms.cityoftacoma.org/Planning/Plan%20and%20Code%20Amendments/Plan%20and%20Code%20Amendments.pdf>

Tacoma's Land Use Regulatory Code states, "It is also imperative that the code is properly maintained, as it is the key regulatory mechanism that implements the Comprehensive Plan, as cited in the One Tacoma Comprehensive Plan". I believe my story and the fact patterns I have present herein, highlight the impact of such inconsistencies and failures in properly maintain Tacoma's Land Use Regulatory Code and Zoning. If there have been known inconsistencies in Tacoma's Zoning compared to intended plans, then all zoning maps *should have* pervasively communicated the potential for change in all zoning documents so that current and prospective property owners can make informed decisions. What good are these authoritative sources if none of the data is reliable? If the zoning is so volatile and such discrepancies between "plan" and "code" are not effectively communicated, what purpose do these serve? My understanding of the current proposal is to in fact align that code with the One Tacoma Plan. However, I would contend that such proposal must be designed with awareness that there has been significant misalignment for an extended period of time and that individual's such as myself have made material financial/life decisions under the pretense that Tacoma's Land Use Code and Zoning Designations were reliable.

As a Tacoma native, I have long appreciated the value in Tacoma and held steadfast belief in its ongoing success. I also understand that Tacoma's continued growth comes with ramifications requiring complex decisions to ensure that growth is sustainable and equitable to all current and future Tacoma residents. I am reaching out today, not in opposition to this fundamental understanding, but in opposition to its currently planned execution. For the average person, purchasing a home is the largest investment the average individual will make in their lifetime. If the city of Tacoma moves forward with the currently recommended rezoning, I certainly hope that is not the case for myself, my neighbors, and other Tacoma residents that may be facing similar ramifications. **I would strongly urge you to reconsider the proposed rezone to E L St & E 29<sup>th</sup> St and to amend future plans to Single Family and Multi-Family Low Density zoning that more closely align with the characteristics described in Tacoma's Land Use Designations. In addition, I would request that you provide the same view-sensitive overlay property protections to the Strawberry Hill neighborhood that are available to homeowners in other areas of Tacoma with similar views.**

Sincerely – A Concerned Tacoma Homeowner,

Nick Malo

# Appendix

## Appendix 1 – Strawberry Hill Walk Score

<https://www.walkscore.com/score/2919-e-k-st-tacoma-wa-98404>

### 2919 East K Street

Eastside, Tacoma, 98404

Commute to **Downtown Tacoma**

6 min 13 min 51 min [View Routes](#)

[Favorite](#) [Map](#) [Nearby Apartments](#)

[More about 2919 East K Street](#)

Walk Score  
**41**

#### Car-Dependent

Most errands require a car.

Bike Score  
**35**

#### Somewhat Bikeable

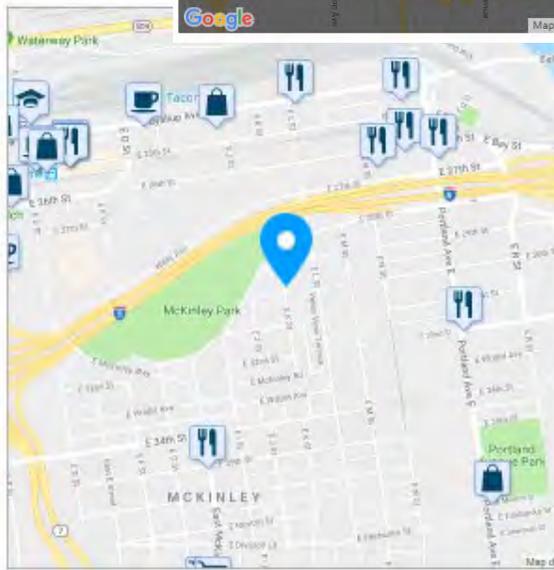
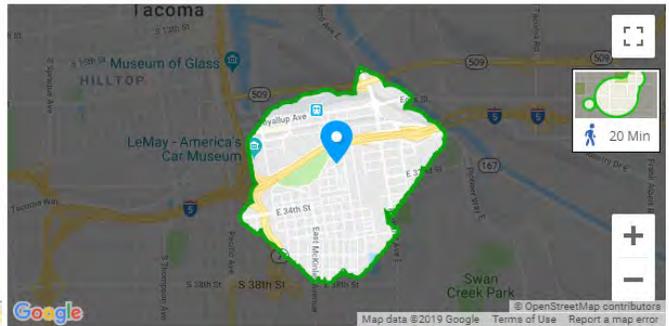
[About your score](#)

[Add scores to your site](#)

### Travel Time Map

[Add to your site](#)

Explore how far you can travel by car, bus, bike and foot from 2919 East K Street.



[Compare Rates with LendingTree Now!](#)

## About this Location



2919 East K Street has a Walk Score of 41 out of 100. This location is a Car-Dependent neighborhood so most errands require a car.

2919 East K Street is a 19 minute walk from the Tacoma Link light rail at the Tacoma Dome Station stop.

This location is in the Eastside neighborhood in Tacoma. Nearby parks include Rogers Park, McKinley Park and Portland Avenue Park.

## Appendix 2 – References to Equitability, Public Engagement & Participation, & Consistency

### Equitability

- RCW 36.70A.070 “Comprehensive plans—Mandatory elements” states, “Each comprehensive plan shall include a plan, scheme, or design for each of the following:” “... (2) 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.”<sup>19</sup>
- The “FLUM – 2019 Amendment - Scope and Assessment” states in the Proposed Outreach section, “Outreach efforts will need to be equitable and seek to engage a variety of communities and community interests in Tacoma, particularly those areas that have been historically underrepresented in zoning and land use processes.”<sup>20</sup>
- The “One Tacoma Plan Book – Housing” states, “Ensuring a fair and equitable housing market is essential to providing the opportunities and security people need to live healthy and successful lives. Economic, social and physical barriers limit many Tacomans’ access to adequate housing. Income, physical disabilities, immigration status, limited English proficiency, and discrimination based on race and sexual orientation can also limit choices”<sup>21</sup> and its stated goal H-2 is to “Ensure equitable access to housing, making a special effort to remove disparities in housing access for people of color, low-income households, diverse household types, older adults, and households that include people with disabilities.”
- OneTacomaPlan Housing Goals:
  - GOAL H–1 Promote access to high-quality affordable housing that accommodates Tacomans’ needs, preferences, and financial capabilities in terms of different types, tenures, density, sizes, costs, and locations.
  - GOAL H–2 Ensure equitable access to housing, making a special effort to remove disparities in housing access for people of color, low-income households, diverse household types, older adults, and households that include people with disabilities.
  - GOAL H–3 Promote safe, healthy housing that provides convenient access to jobs and to goods and services that meet daily needs. This housing is connected to the rest of the city and region by safe, convenient, affordable multimodal transportation.
  - GOAL H–4 Support adequate supply of affordable housing units to meet the needs of residents vulnerable to increasing housing costs.
  - GOAL H–5 Encourage access to resource efficient and high performance housing that is well integrated with its surroundings, for people of all abilities and income levels.

### Public Engagement & Participation

- RCW 36.70A.140 “Comprehensive plans—Ensure public participation” states, “Each county and city that is required or chooses to plan under RCW 36.70A.040 shall establish and broadly disseminate to the public a public participation program identifying procedures providing for early and continuous public participation in the development and amendment of comprehensive land use plans and development regulations implementing such plans.”<sup>22</sup>

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<sup>19</sup> [Comprehensive plans—Mandatory elements \(RCW 36.70A.070\)](#)

<sup>20</sup> [FLUM – 2019 Amendment - Scope and Assessment](#)

<sup>21</sup> [One Tacoma Plan - Housing](#)

<sup>22</sup> [Comprehensive plans—Ensure public participation \(RCW 36.70A.140\)](#)

- RCW 36.70A.035 “Public participation—Notice provisions” states, “The public participation requirements of this chapter shall include notice procedures that are reasonably calculated to provide notice to property owners and other affected and interested individuals, tribes, government agencies, businesses, school districts”.<sup>23</sup>
- The “Tacoma Planning 2019 Public Engagement Plan” states, “Tacoma is committed to authentic public engagement and recognizes that the complexity and changing character of planning issues, technology and the city itself requires thoughtful innovation to ensure inclusive and equitable community engagement. Increasingly diverse demographics, as well as past failures to fully engage all members of the community, point to the need for new approaches to citizen engagement that promote inclusive participation. Changes in communication technology allow, and even require, the city to offer new avenues for engagement, and hopefully, collaboration. Finally, the city’s natural and built character and infrastructure are constantly evolving and continually require citizen input.”<sup>24</sup>

## Consistency

- RCW 36.70A.070 “Comprehensive plans—Mandatory elements” states, “The comprehensive plan of a county or city that is required or chooses to plan under RCW 36.70A.040 shall consist of a map or maps, and descriptive text covering objectives, principles, and standards used to develop the comprehensive plan. The plan shall be an internally consistent document and all elements shall be consistent with the future land use map.”
- The “FLUM – 2019 Amendment - Scope and Assessment” states, “The One Tacoma Plan contains policies that support implementation of the Comprehensive Plan land use designations through zoning and development standards in a way that provides **predictability and consistency of application** while also allowing adequate flexibility to support a diverse set of housing, commercial and industrial uses.” It goes on to say, “Both state law in the Growth Management Act and local ordinances require that the City bring the zoning districts into conformance with the Plan or to amend the Plan to be consistent with the existing zoning. Ultimately, the Plan and Code must be internally consistent.”
- The “One Tacoma Plan Book – Urban Form” Policy UF-1.2 states that the City should “Implement Comprehensive Plan land use designations through zoning designations and target densities shown in Table 3, Comprehensive Plan Land Use Designations and Corresponding Zoning.” In addition, policy UF-1.1 states that the City should “ensure that the Comprehensive Plan Land Use Map establishes and maintains land use designations that can accommodate planned population and employment growth.”
- The “Comprehensive Plan And Land Use Regulatory Code Proposed Amendments for 2019 – Public Review Document” states, “The overall objective for the Code Cleanups is to keep the code current, respond to the changing environment and conditions, and enhance customer service. It is also imperative that the code is properly maintained, as it is the key regulatory mechanism that implements the Comprehensive Plan”.
- The “One Tacoma Plan – Engagement, Administration + Implementation” states, “Land Use Regulations – Land use regulations are laws that establish what can or can’t be built in a given location. The key regulatory mechanism that implements the Comprehensive Plan is Tacoma’s Land Use Regulatory Code. This code contains the development regulations that govern the manner by which land is used, developed, or redeveloped in the City. This code is found in Title 13 of the Tacoma Municipal Code and includes regulations for platting, zoning, shorelines and critical areas.”<sup>25</sup>

<sup>23</sup> [Public participation—Notice provisions \(RCW 36.70A.035\)](#)

<sup>24</sup> [Tacoma Planning 2019 Public Engagement Plan](#)

<sup>25</sup> [One Tacoma Plan – Engagement, Administration + Implementation](#)

Appendix 3 – US 2010 Census & FLUM Potential Area-wide Rezone Analysis

# Neighborhood Council District	Average Percent Owner Occupied Units	Average Percent Vacant Units	Average Median Rent	Average Median Home Value	Average Median Household Income	Average Percent of Persons Below Poverty	Average Percent Unemployment	Number of FLUM Potential Area-wide Rezones	Percent of Total FLUM Potential Area-wide Rezones	Number of FLUM Potential Area-wide Rezones (R4-High Density)	Percent of Total FLUM Potential Area-wide Rezones (R4-High Density)	FLUM Potential Area-wide Rezone Comment	Percent of Total FLUM Potential Area-wide Rezone Comment	Ratio of Public Comment to Number of Potential Area-wide Rezone
1 Citywide	54.60%	8.82%	\$ 911.21	\$ 256,630	\$ 49,462	18.73%	10.16%	81	100.00%	14	100.00%	167	100.00%	206.17%
2 North East	79.53%	4.27%	\$ 1,267.67	\$ 359,533	\$ 84,796	5.47%	3.70%	3	3.70%	0	0.00%	3	1.80%	100.00%
3 North End	69.34%	6.66%	\$ 940.00	\$ 351,860	\$ 69,340	8.18%	6.16%	10	12.35%	2	14.29%	95	56.89%	950.00%
4 West End	58.76%	7.20%	\$ 909.71	\$ 297,986	\$ 55,438	11.73%	7.31%	10	12.35%	3	21.43%	27	16.17%	270.00%
5 South End	62.81%	7.43%	\$ 901.00	\$ 206,189	\$ 47,067	16.72%	8.90%	9	11.11%	1	7.14%	7	4.19%	77.78%
6 Central	52.65%	9.38%	\$ 878.75	\$ 223,450	\$ 41,731	20.30%	13.05%	14	17.28%	1	7.14%	18	10.78%	128.57%
7 South Tacoma	43.10%	10.06%	\$ 897.20	\$ 201,960	\$ 42,314	21.98%	10.44%	23	28.40%	3	21.43%	0	0.00%	0.00%
8 Eastside	53.64%	7.82%	\$ 883.60	\$ 191,840	\$ 38,116	28.50%	13.66%	10	12.35%	3	21.43%	9	5.39%	90.00%
9 New Tacoma	18.30%	17.80%	\$ 756.60	\$ 278,560	\$ 28,926	36.36%	16.88%	2	2.47%	1	7.14%	8	4.79%	400.00%
10 Rank by District (1 Best - 8 Worst)														
11 North East	1	1	8	1	1	1	1	2	2	1	1	7	7	5
12 North End	2	2	7	2	2	2	2	5	5	5	5	1	1	1
13 West End	4	3	6	3	3	3	3	5	5	7	7	2	2	3
14 South End	3	4	5	4	4	4	4	3	3	4	3	6	6	7
15 Central	6	6	2	5	6	5	6	7	7	7	7	3	3	4
16 South Tacoma	7	7	4	7	5	6	5	8	8	7	7	8	8	8
17 Eastside	5	5	3	8	7	7	7	5	5	7	7	4	4	6
18 New Tacoma	8	8	1	4	8	8	8	1	1	3	3	5	5	2
19 Below Citywide Average (Y / N)														
20 North East	N	Y	N	N	N	Y	Y	N/A	N/A	N/A	N/A	N/A	N/A	Y
21 North End	N	Y	N	N	N	Y	Y	N/A	N/A	N/A	N/A	N/A	N/A	N
22 West End	N	Y	Y	N	N	Y	Y	N/A	N/A	N/A	N/A	N/A	N/A	N
23 South End	N	Y	Y	Y	Y	Y	Y	N/A	N/A	N/A	N/A	N/A	N/A	Y
24 Central	Y	N	Y	Y	Y	N	N	N/A	N/A	N/A	N/A	N/A	N/A	Y
25 South Tacoma	Y	N	Y	Y	Y	N	N	N/A	N/A	N/A	N/A	N/A	N/A	Y
26 Eastside	Y	Y	Y	Y	Y	N	N	N/A	N/A	N/A	N/A	N/A	N/A	Y
27 New Tacoma	Y	N	Y	N	Y	N	N	N/A	N/A	N/A	N/A	N/A	N/A	N
28 Variance From Citywide Average														
29 North East	24.94%	-4.55%	\$ 356.46	\$ 102,903	\$ 35,343	-13.3%	-4.2%	N/A	N/A	N/A	N/A	N/A	N/A	-106.17%
30 North End	14.74%	-2.16%	\$ 28.79	\$ 95,230	\$ 19,888	-10.5%	-4.0%	N/A	N/A	N/A	N/A	N/A	N/A	743.83%
31 West End	4.16%	-1.62%	\$ (1.50)	\$ 41,355	\$ 5,986	-7.0%	-2.8%	N/A	N/A	N/A	N/A	N/A	N/A	63.83%
32 South End	8.21%	-1.39%	\$ (10.21)	\$ (50,444)	\$ (2,386)	-2.0%	-1.3%	N/A	N/A	N/A	N/A	N/A	N/A	-128.40%
33 Central	-1.95%	0.55%	\$ (32.46)	\$ (33,180)	\$ (7,722)	1.6%	2.9%	N/A	N/A	N/A	N/A	N/A	N/A	-77.60%
34 South Tacoma	-11.50%	1.24%	\$ (14.01)	\$ (54,670)	\$ (7,139)	3.3%	0.3%	N/A	N/A	N/A	N/A	N/A	N/A	-206.17%
35 Eastside	-0.96%	-1.00%	\$ (27.61)	\$ (64,790)	\$ (11,337)	9.8%	3.5%	N/A	N/A	N/A	N/A	N/A	N/A	-116.17%
36 New Tacoma	-36.30%	8.98%	\$ (154.61)	\$ 21,930	\$ (20,527)	17.6%	6.7%	N/A	N/A	N/A	N/A	N/A	N/A	193.83%
37 Variance From Citywide Average (%)														
38 North East	45.67%	-51.63%	39.12%	40.10%	71.47%	-70.81%	-41.62%	N/A	N/A	N/A	N/A	N/A	N/A	-51.50%
39 North End	27.00%	-24.50%	3.16%	37.11%	40.22%	-56.32%	-39.39%	N/A	N/A	N/A	N/A	N/A	N/A	360.78%
40 West End	7.62%	-18.36%	-0.16%	16.11%	12.10%	-37.37%	-28.03%	N/A	N/A	N/A	N/A	N/A	N/A	30.96%
41 South End	15.04%	-15.73%	-1.12%	-19.66%	-4.82%	-10.71%	-12.48%	N/A	N/A	N/A	N/A	N/A	N/A	-62.28%
42 Central	-3.57%	6.28%	-3.56%	-12.93%	-15.61%	8.39%	28.41%	N/A	N/A	N/A	N/A	N/A	N/A	-37.64%
43 South Tacoma	-21.06%	14.05%	-1.54%	-21.30%	-14.44%	17.36%	2.73%	N/A	N/A	N/A	N/A	N/A	N/A	-100.00%
44 Eastside	-1.75%	-11.35%	-3.03%	-25.25%	-22.92%	52.18%	34.41%	N/A	N/A	N/A	N/A	N/A	N/A	-56.35%
45 New Tacoma	-66.48%	101.79%	-16.97%	8.55%	-41.51%	94.15%	66.10%	N/A	N/A	N/A	N/A	N/A	N/A	94.01%

**Appendix 4 – Tacoma Housing Composition Summary by District**

<b>District</b>	<b># of Parcels</b>	<b>Sum of Land Net Square Feet</b>	
Citywide	67,661	619,408,203	
<b>Housing Type - Single / Multi-Family / Vacant</b>	<b># of Parcels</b>	<b>Sum of Land Net Square Feet</b>	<b>% of Total Tacoma Land by Parcel</b>
Multi-Family	6,853	63,054,619	10.18%
Multi-Family (High Density)	2,267	60,810,584	9.82%
Single Family Dwelling	55,770	430,116,647	69.44%
Vacant	2,771	65,426,354	10.56%
<b>Grand Total</b>	<b>67,661</b>	<b>619,408,203</b>	<b>100.00%</b>

# District	Housing Type - Single / Multi-Family / Vacant	# of Parcels	Sum of Land Net Square Feet	% of Total District Parcels	% of Citywide Parcels by Housing Type [District Rank]	% of Total District Parcels [District Rank]	% of Citywide Parcels by Housing Type [District Rank]	% of Citywide Multi-Family (High Density) Parcels	% of Citywide Multi-Family (High Density) Parcels [District Rank]
1	North East	643	3,858,462	8.68%	6	9.38%	5		8
2	North East	6,376	69,879,616	86.12%	4	11.43%	5	0.00%	
3	North East	385	25,893,041	N/A	N/A	N/A	N/A		
4	North End	1,035	3,692,698	9.87%	5	15.10%	3		
5	North End	44	26,060	0.42%	5	1.94%	5	1.94%	5
6	North End	9,044	55,925,621	86.23%	3	16.22%	2		
7	North End	365	4,648,778	N/A	N/A	N/A	N/A		
8	West End	1,570	14,539,627	16.42%	3	22.91%	1		
9	West End	73	430,809	0.76%	4	3.22%	4		
10	West End	7,655	69,171,284	80.06%	6	13.73%	4	3.22%	4
11	West End	264	9,671,080	N/A	N/A	N/A	N/A		
12	South End	523	9,676,083	3.97%	8	7.63%	7		
13	South End	12,199	93,281,684	92.63%	1	21.87%	1	0.00%	8
14	South End	448	6,723,534	N/A	N/A	N/A	N/A		
15	Central	881	5,281,338	11.83%	4	12.86%	4		
16	Central	4	171,248	0.05%	6	0.18%	6	0.18%	6
17	Central	6,224	37,297,919	83.54%	5	11.16%	6		
18	Central	341	2,847,339	N/A	N/A	N/A	N/A		
19	South Tacoma	1,260	21,208,754	17.92%	2	18.39%	2		
20	South Tacoma	208	4,159,867	2.96%	2	9.18%	2	9.18%	2
21	South Tacoma	5,308	37,908,740	75.47%	7	9.52%	7		
22	South Tacoma	257	6,727,877	N/A	N/A	N/A	N/A		
23	Eastside	412	3,046,785	4.14%	7	6.01%	8		
24	Eastside	140	152,493	1.41%	3	6.18%	3	6.18%	3
25	Eastside	8,718	65,720,246	87.57%	2	15.63%	3		
26	Eastside	685	8,823,688	N/A	N/A	N/A	N/A		
27	New Tacoma	529	1,750,870	20.35%	1	7.72%	6		
28	New Tacoma	1,798	55,870,107	69.18%	1	79.31%	1	79.31%	1
29	New Tacoma	246	931,538	9.47%	8	0.44%	8		
30	New Tacoma	26	91,016	N/A	N/A	N/A	N/A		
31		67,661	619,408,203						

# District	Housing Type - Single / Multi-Family / Vacant	# of Parcels	Sum of Land Net Square Feet	% of Total District Parcels	% of Total District Parcels [District Rank]	% of Citywide Parcels by Housing Type	% of Citywide Parcels by Housing Type [District Rank]
<b>1 Multi-Family (High Density) Summary</b>							
2	North End Multi-Family (High Density)	44	26,060	0.42%	5	1.94%	5
3	West End Multi-Family (High Density)	73	430,809	0.76%	4	3.22%	4
4	Central Multi-Family (High Density)	4	171,248	0.05%	6	0.18%	6
5	South Tacoma Multi-Family (High Density)	208	4,159,867	2.96%	2	9.18%	2
6	Eastside Multi-Family (High Density)	140	152,493	1.41%	3	6.18%	3
7	New Tacoma Multi-Family (High Density)	1,798	55,870,107	69.18%	1	79.31%	1
8		<b>2,267</b>	<b>60,810,584</b>				
<b>9 Multi-Family Summary</b>							
10	North East Multi-Family	643	3,858,462	8.68%	6	9.38%	5
11	North End Multi-Family	1,035	3,692,698	9.87%	5	15.10%	3
12	West End Multi-Family	1,570	14,539,627	16.42%	3	22.91%	1
13	South End Multi-Family	523	9,676,083	3.97%	8	7.63%	7
14	Central Multi-Family	881	5,281,338	11.83%	4	12.86%	4
15	South Tacoma Multi-Family	1,260	21,208,754	17.92%	2	18.39%	2
16	Eastside Multi-Family	412	3,046,785	4.14%	7	6.01%	8
17	New Tacoma Multi-Family	529	1,750,870	20.35%	1	7.72%	6
18		<b>6,853</b>	<b>63,054,619</b>				
<b>19 Single Family Dwelling Summary</b>							
20	North East Single Family Dwelling	6,376	69,879,616	86.12%	4	11.43%	5
21	North End Single Family Dwelling	9,044	55,925,621	86.23%	3	16.22%	2
22	West End Single Family Dwelling	7,655	69,171,284	80.06%	6	13.73%	4
23	South End Single Family Dwelling	12,199	93,281,684	92.63%	1	21.87%	1
24	Central Single Family Dwelling	6,224	37,297,919	83.54%	5	11.16%	6
25	South Tacoma Single Family Dwelling	5,308	37,908,740	75.47%	7	9.52%	7
26	Eastside Single Family Dwelling	8,718	65,720,246	87.57%	2	15.63%	3
27	New Tacoma Single Family Dwelling	246	931,538	9.47%	8	0.44%	8
28		<b>55,770</b>	<b>430,116,647</b>				
<b>29 Vacant Summary</b>							
30	North East Vacant	385	25,893,041	N/A	N/A	N/A	N/A
31	North End Vacant	365	4,648,778	N/A	N/A	N/A	N/A
32	West End Vacant	264	9,671,080	N/A	N/A	N/A	N/A
33	South End Vacant	448	6,723,534	N/A	N/A	N/A	N/A
34	Central Vacant	341	2,847,339	N/A	N/A	N/A	N/A
35	South Tacoma Vacant	257	6,727,877	N/A	N/A	N/A	N/A
36	Eastside Vacant	685	8,823,688	N/A	N/A	N/A	N/A
37	New Tacoma Vacant	26	91,016	N/A	N/A	N/A	N/A
38		<b>2,771</b>	<b>65,426,354</b>				
<b>39 VACANT LAND UNDEVELOPED Summary</b>							
40	North East VACANT LAND UNDEVELOPED	291	20,467,833	N/A	N/A	N/A	N/A
41	North End VACANT LAND UNDEVELOPED	255	2,260,210	N/A	N/A	N/A	N/A
42	West End VACANT LAND UNDEVELOPED	196	6,694,572	N/A	N/A	N/A	N/A
43	South End VACANT LAND UNDEVELOPED	399	6,416,525	N/A	N/A	N/A	N/A
44	Central VACANT LAND UNDEVELOPED	245	1,837,519	N/A	N/A	N/A	N/A
45	South Tacoma VACANT LAND UNDEVELOPED	238	6,596,697	N/A	N/A	N/A	N/A
46	Eastside VACANT LAND UNDEVELOPED	599	7,561,448	N/A	N/A	N/A	N/A
47	New Tacoma VACANT LAND UNDEVELOPED	24	74,000	N/A	N/A	N/A	N/A
48		<b>2,247</b>	<b>51,908,802</b>				

# District	Housing Type - Single / Multi-Family / Vacant	Use Description	# of Parcels	Sum of Land Net Square Feet	% of Total District Parcels	% of Citywide Parcels
1	North East	Multi-Family	77	302,276	1.04%	0.11%
2	North East	Multi-Family	74	968,235	1.00%	0.11%
3	North East	Multi-Family	85	787,269	1.15%	0.13%
4	North East	Multi-Family	8	93,901	0.11%	0.01%
5	North East	Multi-Family	393	1,314,906	5.31%	0.58%
6	North East	Multi-Family	3	362,003	0.04%	0.00%
7	North East	Multi-Family	3	29,872	0.04%	0.00%
8	North East	Single Family Dwelling	5	30,365	0.07%	0.01%
9	North East	Single Family Dwelling	6,371	69,849,251	86.05%	9.42%
10	North East	Vacant	2	27,825	0.03%	0.00%
11	North East	Vacant	16	523,926	0.22%	0.02%
12	North East	Vacant	76	4,873,457	1.03%	0.11%
13	North East	Vacant	291	20,467,833	3.93%	0.43%
14	North End	Multi-Family	382	531,638	3.64%	0.56%
15	North End	Multi-Family	256	1,429,487	2.44%	0.38%
16	North End	Multi-Family	42	99,578	0.40%	0.06%
17	North End	Multi-Family	97	611,492	0.92%	0.14%
18	North End	Multi-Family	135	229,852	1.29%	0.20%
19	North End	Multi-Family	37	352,185	0.35%	0.05%
20	North End	Multi-Family	75	412,421	0.72%	0.11%
21	North End	Multi-Family	11	26,045	0.10%	0.02%
22	North End	Multi-Family (High Density)	44	26,060	0.42%	0.07%
23	North End	Single Family Dwelling	6	12,114	0.06%	0.01%
24	North End	Single Family Dwelling	9,038	55,913,507	86.17%	13.36%
25	North End	Vacant	2	16,200	0.02%	0.00%
26	North End	Vacant	108	2,372,369	1.03%	0.16%
27	North End	Vacant	255	2,260,210	2.43%	0.38%
28	West End	Multi-Family	1,031	4,601,328	10.78%	1.52%
29	West End	Multi-Family	24	192,658	0.25%	0.04%
30	West End	Multi-Family	68	425,276	0.71%	0.10%
31	West End	Multi-Family	12	128,256	0.13%	0.02%
32	West End	Multi-Family	354	1,225,882	3.70%	0.52%
33	West End	Multi-Family	70	6,877,210	0.73%	0.10%
34	West End	Multi-Family	7	1,055,338	0.07%	0.01%
35	West End	Multi-Family	4	33,679	0.04%	0.01%
36	West End	Multi-Family (High Density)	72	392,912	0.75%	0.11%
37	West End	Multi-Family (High Density)	1	37,897	0.01%	0.00%
38	West End	Single Family Dwelling	37	290,809	0.39%	0.05%
39	West End	Single Family Dwelling	7,618	68,880,475	79.67%	11.26%
40	West End	Vacant	4	27,061	0.04%	0.01%
41	West End	Vacant	64	2,949,448	0.67%	0.09%
42	West End	Vacant	196	6,694,572	2.05%	0.29%
43	South End	Multi-Family	115	4,750,903	0.87%	0.17%
44	South End	Multi-Family	194	1,379,449	1.47%	0.29%
45	South End	Multi-Family	42	264,298	0.32%	0.06%
46	South End	Multi-Family	5	10,979	0.04%	0.01%
47	South End	Multi-Family	124	2,931,229	0.94%	0.18%
48	South End	Multi-Family	40	329,458	0.30%	0.06%
49	South End	Multi-Family	3	9,768	0.02%	0.00%
50	South End	Single Family Dwelling	2	10,062	0.02%	0.00%
51	South End	Single Family Dwelling	12,197	93,271,622	92.61%	18.03%
52	South End	Vacant	7	205,865	0.05%	0.01%
53	South End	Vacant	5	30,869	0.04%	0.01%
54	South End	Vacant	37	70,276	0.28%	0.05%
55	South End	Vacant	399	6,416,525	3.03%	0.59%

56	Central	Multi-Family	APT/CONDO 3 STOR OR LESS	254	763,331	3.41%	0.38%
57	Central	Multi-Family	DUPLEX 2 UNITS	250	1,340,023	3.36%	0.37%
58	Central	Multi-Family	DUPLEX CONDO	17	58,660	0.23%	0.03%
59	Central	Multi-Family	FOURPLEX 4 UNITS	44	245,400	0.59%	0.07%
60	Central	Multi-Family	FOURPLEX OR MORE CONDO	196	212,879	2.63%	0.29%
61	Central	Multi-Family	MULTI FAM APTS 5 UNITS OR MORE	58	2,040,042	0.78%	0.09%
62	Central	Multi-Family	SUBSIDIZED UNITS 5 OR MORE	12	291,357	0.16%	0.02%
63	Central	Multi-Family	TRIPLEX 3 UNITS	44	317,159	0.59%	0.07%
64	Central	Multi-Family	TRIPLEX CONDO	6	12,487	0.08%	0.01%
65	Central	Multi-Family (High Density)	MULTI FAM HIGH RISE 5 UNITS OR MORE	4	171,248	0.05%	0.01%
66	Central	Single Family Dwelling	SINGLE FAMILY DWELLING	6,224	37,297,919	83.54%	9.20%
67	Central	Vacant	COMM VAC LAND	20	461,939	0.27%	0.03%
68	Central	Vacant	VAC LND BLDG RESTRICT DOC REQ	2	19,500	0.03%	0.00%
69	Central	Vacant	VAC LND NOT A BLDG SITE	74	528,381	0.99%	0.11%
70	Central	Vacant	VACANT LAND UNDEVELOPED	245	1,837,519	3.29%	0.36%
71	South Tacoma	Multi-Family	APT/CONDO 3 STOR OR LESS	36	1,862,784	0.51%	0.05%
72	South Tacoma	Multi-Family	DUPLEX 2 UNITS	324	2,213,578	4.61%	0.48%
73	South Tacoma	Multi-Family	DUPLEX CONDO	44	222,940	0.63%	0.07%
74	South Tacoma	Multi-Family	FOURPLEX 4 UNITS	118	1,259,150	1.68%	0.17%
75	South Tacoma	Multi-Family	FOURPLEX OR MORE CONDO	188	472,509	2.67%	0.28%
76	South Tacoma	Multi-Family	MULTI FAM APTS 5 UNITS OR MORE	400	13,940,526	5.69%	0.59%
77	South Tacoma	Multi-Family	SUBSIDIZED UNITS 5 OR MORE	8	344,667	0.11%	0.01%
78	South Tacoma	Multi-Family	TRIPLEX 3 UNITS	82	730,845	1.17%	0.12%
79	South Tacoma	Multi-Family	TRIPLEX CONDO	60	161,754	0.85%	0.09%
80	South Tacoma	Multi-Family (High Density)	APT CONDO HIGH RISE	207	4,146,867	2.94%	0.31%
81	South Tacoma	Multi-Family (High Density)	MULTI FAM HIGH RISE 5 UNITS OR MORE	1	13,000	0.01%	0.00%
82	South Tacoma	Single Family Dwelling	SINGLE FAMILY DWELLING	5,308	37,908,740	75.47%	7.84%
83	South Tacoma	Vacant	COMM VAC LAND	3	9,750	0.04%	0.00%
84	South Tacoma	Vacant	VAC LND BLDG RESTRICT DOC REQ	3	27,395	0.04%	0.00%
85	South Tacoma	Vacant	VAC LND NOT A BLDG SITE	13	94,035	0.18%	0.02%
86	South Tacoma	Vacant	VACANT LAND UNDEVELOPED	238	6,596,697	3.38%	0.35%
87	Eastside	Multi-Family	DUPLEX 2 UNITS	266	1,754,236	2.67%	0.39%
88	Eastside	Multi-Family	FOURPLEX 4 UNITS	53	430,766	0.53%	0.08%
89	Eastside	Multi-Family	MULTI FAM APTS 5 UNITS OR MORE	3	31,120	0.03%	0.00%
90	Eastside	Multi-Family	TRIPLEX 3 UNITS	90	830,663	0.90%	0.13%
91	Eastside	Multi-Family (High Density)	APT CONDO HIGH RISE	140	152,493	1.41%	0.21%
92	Eastside	Single Family Dwelling	SINGLE FAMILY DWELLING	8,718	65,720,246	87.57%	12.88%
93	Eastside	Vacant	VAC LND BLDG RESTRICT DOC REQ	2	139,237	0.02%	0.00%
94	Eastside	Vacant	VAC LND NOT A BLDG SITE	84	1,123,004	0.84%	0.12%
95	Eastside	Vacant	VACANT LAND UNDEVELOPED	599	7,561,448	6.02%	0.89%
96	New Tacoma	Multi-Family	APT/CONDO 3 STOR OR LESS	298	310,219	11.47%	0.44%
97	New Tacoma	Multi-Family	DUPLEX 2 UNITS	38	151,133	1.46%	0.06%
98	New Tacoma	Multi-Family	FOURPLEX 4 UNITS	24	132,530	0.92%	0.04%
99	New Tacoma	Multi-Family	FOURPLEX OR MORE CONDO	48	70,530	1.85%	0.07%
100	New Tacoma	Multi-Family	MULTI FAM APTS 5 UNITS OR MORE	97	886,989	3.73%	0.14%
101	New Tacoma	Multi-Family	SUBSIDIZED UNITS 5 OR MORE	12	159,282	0.46%	0.02%
102	New Tacoma	Multi-Family	TRIPLEX 3 UNITS	12	40,187	0.46%	0.02%
103	New Tacoma	Multi-Family (High Density)	APT CONDO HIGH RISE	1,749	54,990,362	67.30%	2.58%
104	New Tacoma	Multi-Family (High Density)	MULTI FAM HIGH RISE 5 UNITS OR MORE	48	863,495	1.85%	0.07%
105	New Tacoma	Multi-Family (High Density)	SUBSIDIZED HIGH RISE 5 OR MORE	1	16,250	0.04%	0.00%
106	New Tacoma	Single Family Dwelling	SFR CONDO	14	21,800	0.54%	0.02%
107	New Tacoma	Single Family Dwelling	SINGLE FAMILY DWELLING	232	909,738	8.93%	0.34%
108	New Tacoma	Vacant	COMM VAC LAND	2	17,016	0.08%	0.00%
109	New Tacoma	Vacant	VACANT LAND UNDEVELOPED	24	74,000	0.92%	0.04%
110				67,661	619,408,203		

Appendix 5 – Section II-A.3 Exhibits: Proposed R-4 Rezones (E. L and E. 29th St) of the “Comprehensive Plan and Land Use Regulatory Code Proposed Amendments for 2019 – Public Review Document”

2019 Comprehensive Plan and Land Use Code Amendments  
Future Land Use Implementation

E L St & E 29<sup>th</sup> St

CURRENT ZONING DISTRICTS:  
R-4L MULTI-FAMILY DISTRICT LOW DENSITY

PROPOSED ZONING DISTRICT:  
R-4 MULTI-FAMILY DISTRICT HIGH DENSITY

PROPOSED ZONING DISTRICT:  
R-4 MULTI-FAMILY (HIGH DENSITY)



**R-4 Multi-Family District**

**Zone Description**  
The R-4 district is intended for medium-density multiple-family housing. Other appropriate uses may include day care centers, and certain types of special needs housing. The R-4 district is located generally along major transportation corridors and between higher and lower intensity uses.

R-4 DEVELOPMENT STANDARDS

Zone Description	R-4 Multi-family
Code Section	TMC13.06.100
Use	TMC13.06.100.C.5
Min. Standard Lot Area (sf)	5,000
Min. Small Lot Area (sf)	2,500
Min. Standard lot width (ft)	50
Min. Small lot width (ft)	25
Bldg. Coverage (%)	65%
Min. Density (units/acre)	18
Max. height (ft)	60
Setback Front (ft)	15
Setback Side (ft)	5
Setback Rear (ft)	25
Tree Canopy (%)	20%

**What is the current zoning in the area?**  
R-2: Single Family Dwelling District  
R-3 - Two Family Dwelling District  
R-4L: Multiple Family Low Density

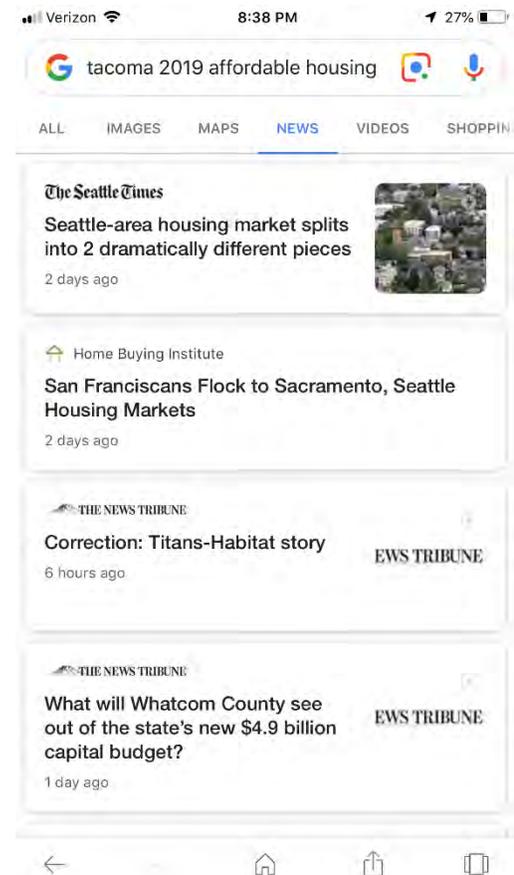
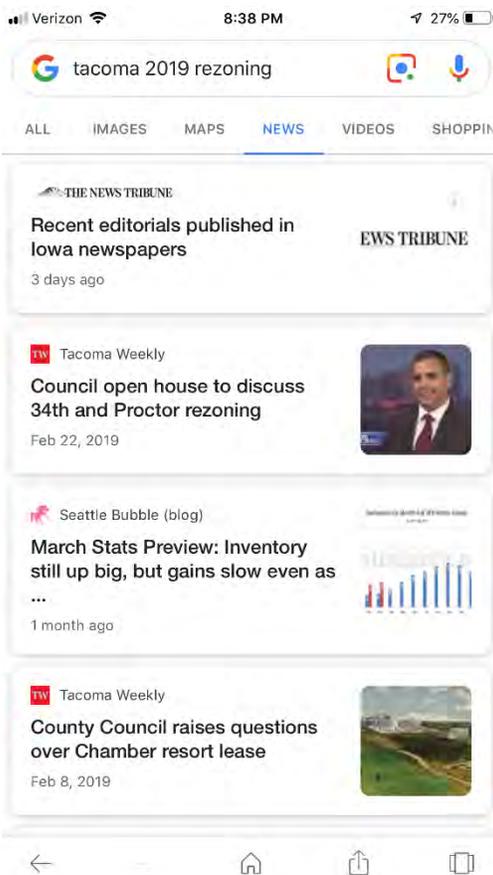
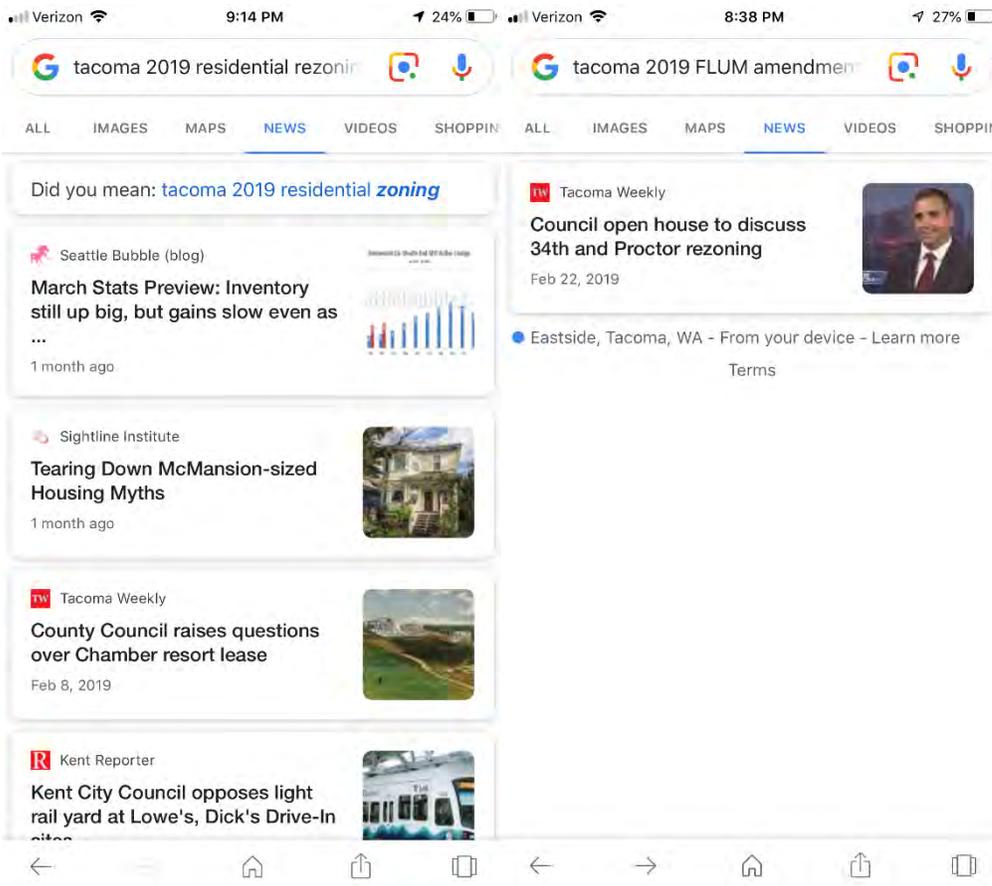
**Why is this area proposed to be rezoned?**

1. The current Comprehensive Plan designation of **Multi-family (high density)**.
2. Proximity to Lower Portland Crossroads Center and McKinley Park.
3. This area has view potential.

To learn more: visit [www.cityoftacoma.org/FLUM](http://www.cityoftacoma.org/FLUM) or email at [planning@cityoftacoma.org](mailto:planning@cityoftacoma.org).  
Planning Commission Public Hearing: May 1, 2019 @ 6:00 PM in Council Chambers, 747 Market Street. Informational Meeting Starts at 5:00 PM prior to the public hearing.



# Appendix 6 – Google Search News Coverage of Area-Wide Rezoning Amendments



one tacoma plan

ALL IMAGES MAPS NEWS VIDEOS SHOPPING

**THE NEWS TRIBUNE**

**Plan to switch downtown apartment project to market rate fails on one council member's vote**

1 day ago



**THE NEWS TRIBUNE**

**Regional university presidents endorse Bevin's pension plan**

2 hours ago



**AN Automotive News**

**Toyota's plan: All pickups on 1 platform**

3 weeks ago



**THE NEWS TRIBUNE**

**The Latest: NWHL plans for season despite player boycott**

9 hours ago



tacoma 2019 comprehensive pl

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**southsoundmag.com**

**Best of the South Sound 2019**

1 day ago



**THE NEWS TRIBUNE**

**A Puyallup plan to divert homelessness calls from police to social workers didn't work**

6 days ago



**THE NEWS TRIBUNE**

**Norfolk Southern railroad hauls in 23% more profit**

1 week ago



**THE NEWS TRIBUNE**

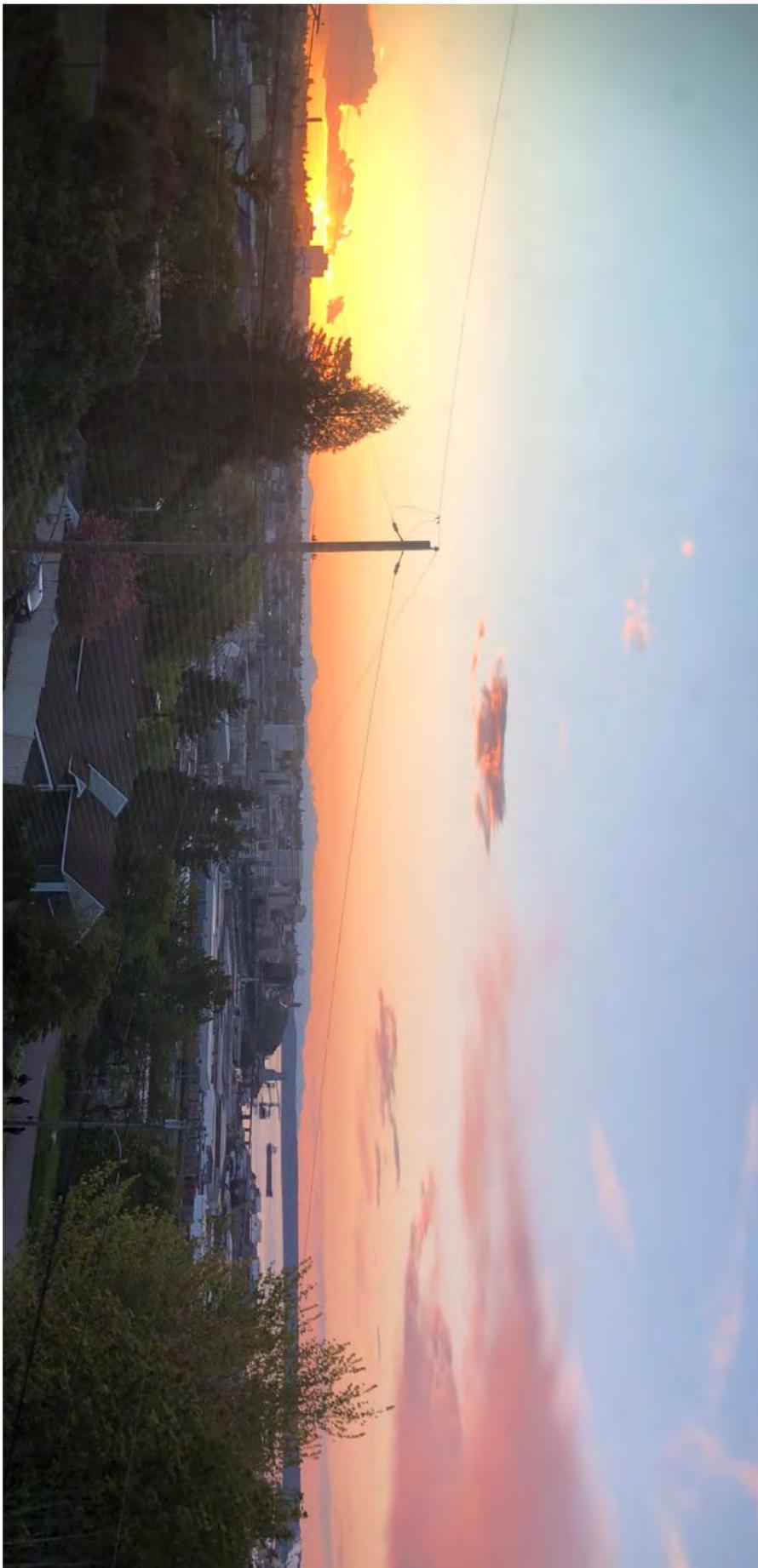
**Colorado gun rights group, GOP members sue to block gun law**

4 hours ago











September 9, 2015

To: Planning Commission  
City of Tacoma

From: Jim Merritt FAIA  
Architect and Planner  
Tacoma

Re: Planning Commission Letter on Affordable Housing and Residential Density

I am supportive of the City's goals to increase affordable housing and residential density in the City of Tacoma. However, in the recent public dialogue, including extensive coverage in The News Tribune, two key issues have been overlooked in the discussion and assessment of long term solutions:

1. Absentee ownership and the lack of proper property management
2. Misallocation of land use in the urban areas of Tacoma

The **first issue** is the dilemma with absentee ownership and the lack of proper management of tenants and facilities that becomes a serious problem when owners do not oversee and maintain the residential units. It appears that the cost effective threshold for sound professional property management is about six units when the proper oversight is affordable.

Currently, the City has the opportunity to increase the housing density in single family residential zones by using the tool that is already in the code. This is commonly called the "mother-in-law" apartment and is defined by an attached accessory dwelling unit to a single family home with the owner occupying the primary residence. This could be modified to allow the accessory dwelling unit to be detached but still comply with the other requirements. The enforcement would be relatively straightforward by monitoring the primary residence of the owner.

The **second issue** is the zoning implementation policy in the City of Tacoma that has allowed extensive proliferation of commercial and public facilities in areas that should be residential. This has been a policy of at least the last 50 years that "transition zoning" has been approved in residential areas, especially along City arterials. It is interesting that most of the arterials in the Northend and the Westend are essentially residential streets while a majority of the arterials in the Southend and Eastside are commercial strip developments. Has this contributed to the perceived nature of each neighborhood? This has meant that a significant amount of the City's land base that should be available for residential use is currently occupied by commercial, retail, or public uses. Some of these facilities are economically marginal with a low customer numbers available and reduced quality due to the lack of good design (because a higher level of design was unaffordable).

Proposed solutions to consider:

1. Tacoma should maintain and encourage the mother-in-law (accessory dwelling unit) apartments in the City's single family residential zone with consideration of the detached option, while keeping the single family residential zone in place with no duplex, triplex, or multifamily allowed.
2. Tacoma should begin a long term (over 20 to 30 years) incentivized program to convert misplaced commercial, retail, and public uses to residential use that can be a significant part of the future residential growth of the City. This approach would provide a significant amount of new residential capacity in the urban growth area of Tacoma (both single family and multi-family).
3. Tacoma should provide for multi-family residential units in transition zones around the mixed use centers of our City as well as downtown. This policy has already been set in motion with multi-family facilities being built in the downtown core as well as in some of the mixed use centers of the City. The challenge will be to include a zone between the defined mixed use centers and the single family residential neighborhoods for multi-family units.

These two issues need to be part of the discussion to clearly define how the residential growth can be a positive for all areas of our City.

End of Memo.

May 1, 2019

To: City of Tacoma Planning Commission

Fr: Jim Merritt FAIA, Architect and Urban Planner

LIVE IN PROCTOR DISTRICT.

Re: Response to 2019 Amendment to the Comprehensive Plan and Land Use Regulatory Code

- Architect with a degree in Architecture and Urban Planning from the University of Washington
- Have worked and volunteered for efforts in the City of Tacoma for 40 years
- The amendments proposed are misguided on so many levels that a short response unrealistic
- The "spot<sup>PC</sup> zoning" would be a disaster for the City of Tacoma < 26 ALDER  
34 PROCTOR
- The amendments should be rejected by the Planning Commission
- The planning staff are process oriented with little or no design background
- This would be like a hospital administrator doing brain surgery
- Architects and designers are not engaged in the process....Why?
- Because architects on the Planning Commission or City Council cannot propose on City<sup>DESIGN</sup> work.
- Why is the Northend, with no community center, considered more desirable than other areas?
- The Northend has mixed use center nodes with essentially no strip development on arterials
- The Eastside and Southend have significant strip development on nearly all major arterials.
- The residential on Pacific Avenue is some of the best residential in the Southend.
- Most of the strip commercial uses on Pacific Avenue are underutilized
- Aurora Avenue in Seattle was a big example in college about wrong strip development
- We are doing the same on many arterials in the city.
- About twenty years ago the City downzoned many residential areas to preserve the areas.
- Underutilized commercial property could be significant in providing residential uses.

- Duplexes and Triplexes in single family residential can pose issues due to absentee owners
- From many studies, a neighborhood that goes under 60% homeownership is in trouble.
- Tacoma has 17 mixed use centers which is way too many for a 200,000 population city.
- Marginal areas designated for spot zoning will expand these small mixed use centers.
- In 2015 I sent letters to the Planning Commission and City Council on this subject.
- I did not receive a response from either body when this was at the beginning of the process.

In summary, we need to throw out these amendments and start with a vision for the City at a design level and not just a process level. One hundred years ago Chicago did this lead by a group of architects. Tacoma can do the same with the local architects through the local chapter of the American Institute of Architects. The path your amendments set in motion may have many unintended consequences. It is time to make good design decisions.

Thank you.

Jim

Accessory Dwelling Unit

October 27, 2015

To: Mayor and City Council  
City of Tacoma

From: Jim Merritt FAIA  
Architect and Planner  
Tacoma

Re: Letter on Affordable Housing, Residential Density, and Zoning

My name is Jim Merritt, an architect and planner, residing at 3201 North Madison in the City of Tacoma.

I am supportive of the City's goals to increase affordable housing and residential density in the City of Tacoma. However, in the recent public dialogue, including extensive coverage in The News Tribune, two key issues have been overlooked in the discussion and assessment of long term solutions:

1. Absentee ownership and the lack of proper property management
2. Misallocation of land use in the urban areas of Tacoma

The **first issue** is the dilemma with absentee ownership and the lack of proper management of tenants and facilities that becomes a serious problem when owners do not oversee and maintain the residential units. It appears that the cost effective threshold for sound professional property management is about six units when the proper oversight is affordable.

Currently, the City has the opportunity to increase the housing density in single family residential zones by using the tool that is already in the code. This is commonly called the "mother-in-law" apartment and is defined by an attached accessory dwelling unit to a single family home with the owner occupying the primary residence. This could be modified to allow the accessory dwelling unit to be detached but still comply with the other requirements. The enforcement would be relatively straightforward by monitoring the primary residence of the owner.

The **second issue** is the zoning implementation policy in the City of Tacoma that has allowed extensive proliferation of commercial and public facilities in areas that should be residential. This has been a policy of at least the last 50 years that "transition zoning" has been approved in residential areas, especially along City arterials. It is interesting that most of the arterials in the Northend and the Westend are essentially residential streets while a majority of the arterials in the Southend and Eastside are commercial strip developments. Has this contributed to the perceived nature of each neighborhood? This has meant that a significant amount of the City's land base that should be available for residential use is currently occupied by commercial, retail, or public uses. Some of these facilities are economically marginal with a low customer numbers available and reduced quality due to the lack of good design (because a higher level of design was unaffordable).

Proposed solutions to consider:

1. Tacoma should maintain and encourage the mother-in-law (accessory dwelling unit) apartments in the City's single family residential zone with consideration of the detached option, while keeping the single family residential zone in place with no duplex, triplex, or multifamily allowed.
2. Tacoma should begin a long term (over 20 to 30 years) incentivized program to convert misplaced commercial, retail, and public uses to residential use that can be a significant part of the future residential growth of the City. This approach would provide a significant amount of new residential capacity in the urban growth area of Tacoma (both single family and multi-family).
3. Tacoma should provide for multi-family residential units in transition zones around the mixed use centers of our City as well as downtown. This policy has already been set in motion with multi-family facilities being built in the downtown core as well as in some of the mixed use centers of the City. The challenge will be to include a zone between the defined mixed use centers and the single family residential neighborhoods for multi-family units.

These two issues need to be part of the discussion to clearly define how the residential growth can be positive for all areas of our City.

I trust that you will seriously considering these items before changing the Land Use Code in a more significant manner than you may intend.

Thank you for your thoughtful consideration.

End of Memo.

**From:** [Paul Mittelstaedt](#)  
**To:** [Atkinson, Stephen](#)  
**Subject:** Proposed Zoning Changes  
**Date:** Wednesday, May 8, 2019 11:18:00 AM

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Good day,

I would like a explanation on proposed zoning change for Parcel 2079360010.

This request seems a bit suspect on its merits. There is only one current property that is available for building or construction. That property is located on a steep incline, is bordered by 29th and L Street. This zoning change is not in the best interest of the neighborhood and seems designed not assist the neighborhoods development, but to please a contractor's desire to utilize the property for profit. This property had remained unused for over 30 years that I know of, and possibility longer due to its elevation changes across the lot. If this was a viable property for residential construction a home would have been built on the area years ago.

A multi-family/residence in this area is not in the best interest of the neighborhood or in attempting to label this zoning change in the interest of affordable housing.

Thank you for your assistance in this matter

Paul Mittelstaedt  
Owner 1010 E 30th Street

May 17, 2019

Planning Commission  
747 Market St, Room 349  
Tacoma, WA 98402

**Re: Comments on Future Land Use Map; Comprehensive Plan; and Manitou Annexation**

Dear City of Tacoma Planning Commissioners,

Thank you for the opportunity to comment on the 2019 Amendment to the Comprehensive Plan and Land Use Code. My name is Molly Nichols, and I am the Tacoma Program Manager with Futurewise, a statewide nonprofit that prevents urban sprawl and advocates for sustainable and equitable land use policies. Over the past year we have supported tenant organizing for tenant protections and affordable housing in Tacoma. This letter comments on the Future Land Use Map Implementation, the Affordable Housing Action Strategy Incorporation into Comprehensive Plan, and the Manitou Potential Annexation.

**Future Land Use Map Implementation**

**We support the proposed rezones and amendments that make our zoning consistent with Tacoma's comprehensive plan.** As our region grows, we need policies in place for compact and connected neighborhoods to manage the growth and ensure equitable access. The proposed zoning changes create opportunities for more residents to live in transit friendly corridors with more amenities. They also help local commercial districts thrive by bringing more residents closer to small businesses, and they support our public transit systems by bringing more riders to the corridors.

These changes also create more diverse housing options. Most of Tacoma is zoned for single family housing, while the regional growth and mixed-use centers are zoned high density multi-family. These proposed rezones create more opportunities for duplexes, triplexes, townhomes, and small apartment buildings—options that will help to meet the diverse housing needs in our community.

Lastly, the proposed changes also begin to address the impacts of redlining and other historically exclusionary practices. Until 1968 when the Fair Housing Act was passed, people of color were legally excluded from buying homes in certain neighborhoods in Tacoma and across the country. Banks refused to lend money for families to purchase homes, and homeowner associations created restrictive covenants. People of color were cut off from neighborhoods like the North End, with amenities including parks, libraries, grocery stores, strong performing schools, adequate transportation infrastructure, and more. While redlining may no longer be legal, de facto versions of it still occur, and we still live with its legacy. We need changes in policies to begin to reverse past and present harm.

**Affordable Housing Action Strategy Incorporation into Comprehensive Plan**

**We fully support the incorporation of the Affordable Housing Action Strategy into the Housing Element of the City's Comprehensive Plan.** Not only does this update the data in the plan and indicate more urgency and action around this issue, but it also begins to address the impacts of historically inequitable zoning decisions and housing policies.

I do want to highlight two omissions from the Affordable Housing Action Strategy that should be brought into the Comprehensive Plan. Futurewise shared these in September when the Affordable Housing Action Strategy was approved by council, and the items are now part of Resolution 40328 (sponsored by Councilmember Beale).



This resolution has not yet been voted on by City Council, but the contents are worth your consideration in this amendment process.

Resolution 40328 proposes the following: “the Planning Commission should develop a housing racial justice policy in the City’s One Tacoma Comprehensive Plan that establishes that the overarching housing and land use policy of the City is to redress institutionalized racism in past and present housing policies, and vigorously commence efforts toward socioeconomic and racial integration into the fabric of Tacoma’s neighborhoods through zoning, programs, funding and policy.” Our current housing system (including our segregated neighborhoods where people of color have less access to amenities and opportunities) is not an accident, but, as Richard Rothstein argues in *The Color of Law* a direct result of segregationist government policies. It is going to take bold government action to reverse this past and present harm, and this Planning Commission plays a vital role.

**Therefore, Tacoma’s comprehensive plan should more explicitly name the historical inequities of redlining, exclusionary zoning, and restrictive covenants to ensure that communities of color and other residents who have been excluded are directly benefiting from new housing policies.**

We understand there is a proposal to replace the PSRC equity maps currently in the Housing Element of the Comprehensive Plan with the City of Tacoma’s new equity maps. Including this more local and updated data is worthwhile. The plan should include access to the entire Equity Index to reveal the demographics of neighborhoods in relation to opportunity. You might also include historical maps to help track the policies and zoning that have determined our current segregated neighborhoods.

Another opportunity for the Planning Commission is to more explicitly lay out the relationship between affordable housing and transportation, especially public transit, in the Housing Element of the Comprehensive Plan. Transit service was a key factor for the area wide re-zones, and the Comprehensive Plan currently maps transit priority networks, which is excellent. With respect to our housing policy, we need to upzone and pass inclusionary housing policies in frequent transit corridors, for example places ¼ mile from buses that run every 15 minutes. This creates mixed income neighborhoods and ensures low income people can access transportation and other amenities.

We also support amending the Comprehensive Plan to include coordinating public investments with affordable housing, expanding tenant protections (especially Just Cause, which requires a legitimate business reason for a landlord to terminate a tenancy), and prioritizing households with the greatest need. The plan could also name the importance of providing incentives for affordable accessory dwelling units and the reduction or elimination of parking requirements. Unnecessary parking requirements direct investments toward housing cars instead of housing people.

**Manitou Potential Annexation:**

**The Manitou unincorporated area of Pierce County should be annexed to the City of Tacoma**, as provided for in the Growth Management Act. Cities have the authorities to provide good public facilities and services long-term to urban areas. The best option for rezoning is Option 2 which includes an R3 designation instead of the R2 designation in Option 1. The R2 designation is a significant down zone from the current Mixed Use District designation which allows 60 foot residential buildings. R3 would not significantly impact the current residential area, and it would begin to meet the goal of creating more opportunities for missing middle housing.

Thank you for considering these comments and for your service on this commission. If you require additional information, please contact me at 412-216-9659 or email [molly@futurewise.org](mailto:molly@futurewise.org).

Sincerely,

Molly Nichols  
Tacoma Program Manager, Futurewise



Mark S. Peterson  
PO Box 88306  
Steilacoom WA, 98388-0306

May 14, 2019

City of Tacoma Planning Staff  
Planning and Development Services  
Tacoma Municipal Building, 3<sup>rd</sup> Floor  
747 Market Street  
Tacoma, WA 98402

Re: 2019 Amendments to the Comprehensive Plan and Land Use Regulatory Code  
Support for the rezone of 1201 S. Monroe St. (Tax ID 7200000150)

Dear Staff,

I would like to express my support for the rezone of my property located at 1201 S. Monroe St (tax parcel id 7200000150).

As I understand the current One Tacoma Comprehensive Plan (One Tacoma) designate a Land Use of Multi-family (Low-Density) on my property. From One Tacoma the Multi-Family Land Use designation supports both the R-3 and R-4L zoning districts with a Target Development Density of 14-36 dwelling units/net acre. The current zoning of the property is R-2 and therefore not in compliance with One Tacoma.

My property is situated along S. 12<sup>th</sup> Ave which is designated as a “Main Street.” The surrounding zoning designations are a mix of C1, R3, and R2 with a mix of uses ranging from retail, three-Family, two-Family, and single-family dwellings. The S. 12<sup>th</sup> Ave Corridor from S. Stevens to S. Adams is a mix of Multi-Family (low density), neighborhood commercial, and single-family residential. Based on the proximity to a “Main Street,” retail properties, two-family, and three-family dwellings. It is my opinion that the property should be rezoned to R-4L to provide for a low-density multi-family development or a three-family development.

The One Tacoma guides long-term community development and describes how the future vision for the city and are to be achieved. The plan outlines “aspirational” goals and policies as a foundation. A number of these goals support the rezone from R2 to R-4L

**Goal UF-1** Guide development, growth, and infrastructure investment to support positive outcomes for all Tacomans

- Goal UF-9** Promote future residential and employment growth in coordination with transit infrastructure and service investments.
- Goal UF-10** Establish designated corridors as thriving places that support and connect Tacoma’s centers

Goal UF-1 establishes the Policies that create the Comprehensive Plan Land Use Maps and shapes the zoning designations. The One Tacoma describes the Multi-family (low density) district as

*...The Multi-Family (low-density) district can often act as a transition between the single-family designation and the greater density and higher intensity uses that can be found in the Multi-Family (high density designation) or commercial or mixed use designations. This designation is more transit-supportive than the Single Family Residential areas and is appropriate along transit routes and within walking distance of transit station areas.*

My property will serve as a buffer between the single-family uses to the west and the higher intensity commercial uses to the east. Furthermore, S. 12<sup>th</sup> St. is currently served by a Pierce Transit bus route providing a direct connection to the Tacoma Community College Transit Center and Downtown Tacoma.

Goal UF-9 encourages development adjacent to transit routes or centers. S. 12<sup>th</sup> St. is designated a high frequency/intensity bus route and a proposed high capacity transit corridor. Higher density developments are more supportive of transit. The higher potential density of the R-4L zoning district should be more desirable along S. 12<sup>th</sup> St.

As mentioned previously S. 12<sup>th</sup> St. has been designated as a “Main Street” under Goal UF-10. One Tacoma states that Main Streets “are streets that include a mix of commercial and multi-family housing development.” It would seem that the intent of the comprehensive plan is to increase the land use intensity along S. 12<sup>th</sup> St. and that zoning that provides for multi-family housing of neighborhood commercial is desired.

My property is located in Tacoma's Central Neighborhood. There are several examples of residential developments in the Central Neighborhood along the S. 12<sup>th</sup> St. corridor which are similar in size and density to the proposed residential development. Each of the following, like 1201 S. Monroe, is located in an area designated as Multi-family (Low-Density). " land use.

Address	Parcel#	Units / Lot size	Rezoned	Yr. Built
4417 S. 12th St.	6800001860	10-unit / .32 acre	1965	1966
4401 S. 12th St.	6800001841	6-unit / .21 acre	1965	2005
3801 S. 12th St.	4130003512	6-unit / .22 acre	1971	1977

As can be seen from the information on the above chart, each example of similar residential development is along the S. 12th St. a “Main Street” corridor and was rezoned to allow for the development of multi-family housing. Each example is very similar to the type of development that could be built on my property in the ratio of units to lot size. The historical and future land

use designations of the S. 12<sup>th</sup> St. corridor indicates that the City of Tacoma desires this type of development in the area.

In summary, I am requesting the rezone of my property from R-2 to R-4L based on the current land use designation of my property in the One Tacoma. R-4L is an appropriate zoning designation as my property is served by transit, is located on a “Main Street,” development can serve as a buffer from adjacent higher intensity commercial uses.

Sincerely,

Mark S. Peterson  
Property Owner

May 14, 2019

Planning Commission  
747 Market Street, Room 349  
Tacoma, Washington 98402

RE: PROPOSED RE-ZONING OF R-4 (Tacoma East Side)

To Whom It May Concern,

I don't recall getting the notification regarding the re-zoning of the East side. I live in the Strawberry Hill neighborhood and it is a historical neighborhood that has been there for years. It would be such a shame to ruin this area by building tall apartments just so they could possibly get a view and the developers could build what they want and take their money and leave because they don't care about the people that have lived there their whole lives. This would bring down everyone's property values as well. How come East Tacoma doesn't have a View Sensitive District Overlay like North Tacoma does that has a height restriction and protects homeowner's property values? East Tacoma, especially, has lots of nice, historical homes along with South Tacoma as well and we should be treated fairly.

I live on East 32<sup>nd</sup> Street on Strawberry Hill and the elderly neighbors that lived across the street sold their home that has a view and also the house next to it sold and I believe the people who have purchased them are waiting for this re-zoning to go thru before they can possibly tear the houses down to slap up a huge apartment building. They are trying to give the impression that someone is actually living in the one, but they only show-up to check on it, not really living there. I don't think it is my imagination.

Anyway, please reconsider this re-zoning. There are lots of other spaces that you could build affordable housing that doesn't have to have a view. Affordable housing and view property don't seem to go hand-in-hand. I do believe it is all about money here.

Thank you for your time and consideration.

Sincerely,



Susan Schorba  
East 32<sup>nd</sup> St.  
Tacoma, WA 98404

**From:** [Lewis Simpson](#)  
**To:** [Planning](#)  
**Subject:** FLUM/in Tacoma  
**Date:** Thursday, May 2, 2019 6:26:35 PM

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I provided an email after the public meeting at Sherman Elementary regarding the rezone. Specifically the North 34th and Proctor area. This email was never responded to or even acknowledged. I did take the time to attend the public comments meeting last night and provided remarks to the Planning Commission.

My opinion is the recommended rezoning of this area is flawed and inappropriate. The planning representative in the hallway recommended that I provide a detailed followup email. This email is an attempt to highlight some details.

The representative stated that the reason for rezone is to provide a transition area from commercial to residential use, and to bring zoning in line with the current use. The actual construction in this area is compatible and has most likely been so for many decades. The building structures are in the range of 50 to 100 years old .... very settled and stable.

This is not a highly commercial area such as the 26th and Proctor shopping, or 6th Avenue corridor. The significant commercial uses are a nursery, day care center, and neighborhood tavern. There are three existing apartment buildings neighboring the commercial businesses but you have neglected re-zoning the Whitmoor Manor at 3418 N. Proctor as R-3 in this rezone.

Instead you have selected a group of three stand alone residential structures across the street which more significantly neighbor the view sensitive overlay, if not a part of it. The corner structure (3824 N. 35th) is a house structure that has been converted to duplex use, sometime in the distant past. R-2SRD classification would bring it into proper zoning. The adjacent 3818 and 3814 N. 35th residences are single family dwellings ... which is most suitable for their location in this well established neighborhood. There is no basis for changing these properties into use into R-3.

Part of the "mixed use" basis cited was access to frequent public transportation. The bus stop at 34th and Proctor was part of the basis for rezone. The reduced service by Pierce Transit which began with an economic downturn about a decade ago removed route 51 from this area. The only transit now servicing this bus stop is route 11 - Point Defiance.

I just consulted the route map schedule. Bus 11 typically runs 30 minutes between bus service during the week and an hour wait on the weekends. It is not a frequent and usable transit.

Correction of the zoning for the apartments at 2909 N. 34th to R-3 is an appropriate step, but extending the R-3 zoning to the rest of the surrounding properties on this 34th street corridor is not justified. The balance of this rezone were all originally single family structures of older architecture which is consistent with the neighboring community.

If you must change the zoning, it appears there is a R-2SRD which fits with the use and nature of these properties. Your brochure on zoning that was provided as hand-out at the Planning Commission meeting last night shows R-3 as typical to boarding homes and townhouses. I object to this plan for the neighborhood's future. It is not necessary and development in this direction would provide a significant neighborhood mis-match. Not a transition.

Currently the properties in this area transition nicely. Introduction of new R-3 construction into this old established neighborhood? It makes one wonder about your qualifications as a planner.

**From:** [Lewis Simpson](#)  
**To:** [Planning](#)  
**Subject:** Fw: FLUM/in Tacoma  
**Date:** Friday, May 3, 2019 7:28:44 AM

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I would like to point out, in addition to this email of yesterday, that the single family residence at 3413 North Proctor is not included in this rezone. This is the property that neighbors the commercial building which ends in the barber shop (3409 North Proctor). This residence remains R-2. The end result will not be transition, but sandwiching and R-2 between commercial and R-3 usage.

The commercial building is single story and receives very little customer use. A transition between it and the existing neighbor R-2 is not necessary. There is a buffer created by a hedge in between them. I am not certain area if this is a vacant alley right-of-way or connected to one of the properties.

The addition of an R-3 strip from 3824 through 3814 North 35th does not transition from commercial to R-2 and future change to townhouses would be a travesty. The current arrangement is consistent with the surrounding properties and neighborhood.

----- Forwarded Message -----

**From:** Lewis Simpson <lew\_tac@yahoo.com>  
**To:** [planning@cityoftacoma.org](mailto:planning@cityoftacoma.org) <[planning@cityoftacoma.org](mailto:planning@cityoftacoma.org)>  
**Sent:** Thursday, May 2, 2019, 8:22:24 PM CDT  
**Subject:** FLUM/in Tacoma

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week and an hour wait on the weekends. It is not a frequent and usable transit.

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Currently the properties in this area transition nicely. Introduction of new R-3 construction into this old established neighborhood? It makes one wonder about your qualifications as a planner.

May 13, 2019

Planning Commission  
747 Market Street, Rm 349  
Tacoma, WA 98402

RE: 2019 Comprehensive Plan and Land Use Regulation Amendments

Dear Planning Commission,

I'm writing to express my concerns and opposition of the proposed rezoning of E. L. St and E. 29<sup>th</sup> St. I'm strongly in opposition of the rezoning proposal for E. L Street and E. 29th Street which would change the zoning from R-4L, a multiple family low density district to R-4, multiple family high density district.

According to your website, this area is proposed to be rezoned because:

1. The current Comprehensive Plan designation is Multi-family (high density)
2. Proximately to lower Portland Crossroads Center and McKinley Park
3. This area has view potential.

I have a number of issues with this proposal.

First, I will briefly describe the neighborhood surrounding 29<sup>th</sup> street. This is a beloved neighborhood that has been around since 1901 when McKinley Park was developed. It is a quiet neighborhood, nestled on Strawberry Hill with scenic views. This area is comprised of single-family homes with historical architecture. According to the City of Tacoma Land Use Designation Table, a multiple family high density (R-4) district is "characterized by taller buildings, higher traffic volumes, reduced setbacks, limited private yard space, and greater noise level". This description does not align with the neighborhood of E. L. St and E. 29<sup>th</sup> St. The neighborhood of Strawberry Hill is more aligned with single family and multiple family low density zoning descriptions. I believe rezoning proposals of communities should reflect and preserve these characteristics as they organically grow, as they have since 1900. The proposed rezoning would eliminate a historical area. I ask that you respect the residential character of this neighborhood as you continue to address the housing demands city wide.

The Strawberry Hill neighborhood shares scenic views of the bay and mountain ranges. These views are one reason the city has stated interest to rezone this area. Rezoning would permit new development to build up to 60 feet. Blocking views of current residents would significant impact property values and owners who have already invested in this small family residential neighborhood. It is stated on the City of Tacoma website that rezoning efforts will "minimize adverse impacts of permitted and conditional use of adjoining land". Rezoning to provide affordable housing "with a view" would adversely impact current residents and is contradictory to this notion of minimizing impact. It is impossible to mitigate the impact on this community if this rezoning is passed.

For someone who has invested in their home with a scenic view in the north end of Tacoma, I would like to see the view protections be applied throughout Tacoma. The View Sensitive Overlay is not consistently applied among districts. It is because of this inconsistency that rezoning proposals such as

this would allow new development to block existing views. This directly impacts home values and have significant financial impacts to current residents. Equitability among all Pierce County home owners is something this city should strive for.

I ask that you strongly reconsider the proposal to rezone the neighborhood of E. L. St and E. 29<sup>th</sup> St. I ask that you pursue other means to meet housing demands in Pierce County for example by allowing homeowners to have detached rentals. I ask that as this city continues to grow, that you address these changes strategically; in ways that reduce impact on residents that have lived here years. I ask that you be respectful of current residential characteristics, have equal protection for homeowners in Pierce County by consistently applying the View Sensitive Overlay, and that equal efforts are made to preserve historical areas throughout Tacoma.

Sincerely,

Mary Thompson

2901 N. 29th Street

Tacoma WA 98407

May 1, 2019

Dear Commissioners:

I object to the FLUM map proposal to move the 400-blocks of North Tacoma Avenue, North G Street and North Yakima Street to the R-4 zoning category. Besides the fact that we do not appear to need more tall apartment/condo buildings at this point in Tacoma's population growth, these streets now have historic homes of early Tacoma residents; these buildings are part of Tacoma's past, that illustrate how the lumber industry changed our city in the early 1900s. They supply an example of "middle-ground zoning" that should be left alone to shelter the residents currently living in them.

Many of these buildings, since the R-4L zoning designation, have been divided into separate apartments, the number depending on the size of each home. These homes are now supplying that "middle ground" in zoning that you and planners tout so loudly. So, my question is:

*Why disrupt a system that is working for shelter more than one family, and doing it in these one-of-a-kind historic old homes? Why? And, please don't tell me to shelter the thousands of new residents you say will settle here over the next 20 years because you can't predict that yet – and there are already many units currently being built in other Tacoma areas.*

If you drive around our city, it is easy to see massive buildings going up all over town! There are not enough tenants waiting in the wings yet to fill them all. It would appear that there is reason to *slow down*, and wait for tenancy in the buildings currently in the works.

Please keep in mind the neighborhood value of these old street scenes, and let the future weigh in for a bit before you jump to a decision that is so destructive to the cohesiveness of the Stadium neighborhood.

Thank you for your volunteer service to Tacoma's citizens.

Julie S. Turner

817 North J. St.

Tacoma, WA 98403

March 25, 2019

To: City of Tacoma Planning & Development Services Dept.

Email to: [planning@cityoftacoma.org](mailto:planning@cityoftacoma.org) & [bboudet@cityoftacoma.org](mailto:bboudet@cityoftacoma.org)

From: Jim Tuttle, [jimtut48@gmail.com](mailto:jimtut48@gmail.com)

cc: Tahoma Unitarian Universalist Congregation

Re: Comments on proposed 2019 Comp. Plan and Land Use Reg. Amendments—  
Oppose proposed new zones, Support Transitional zone for church's ownership

I'm very concerned about the drastic zoning changes which the Planning staff propose for the property of my church, Tahoma Unitarian Universalist Congregation ("Tahoma") at 1115 S. 56<sup>th</sup>. I'm writing as an individual citizen, in the interest of time, but understand that the church itself will be writing to you separately.

First, the three parcels which Tahoma owns should have one zone, not be divided into two different zones. Currently:

#7785006660, the building parcel, is C-2 (General Community Commercial District);

#7785006650, the northerly-adjacent parking lot parcel, is divided between C-2 and R-2 (Single Family Dwelling District); and

#7785006640, the most northerly parking lot parcel, is R-2.

Roughly, the building part of the church's ownership is C-2 and the northern part is R-2.

The [online FLUM Implementation interactive map](#) shows as "POTENTIAL" for both halves either R-3—Two-family Dwelling District or R-4-L—Low-density Multiple-family Dwelling District. However, I believe that at the Feb. 27 Open House the graphic showed parcel -6640 proposed as R-3 and the other two parcels as R-4-L (?).

For reasons explained below, neither of those zones is appropriate. Apparently the R-3 is intended as a sort of buffer or transition between the neighboring R-2 and the higher-density zone facing 56<sup>th</sup>. But in practical terms it is unfair and unnecessary overkill to subject one ownership to two different new zones—especially when supposedly trying to clean up zoning anomalies and when one Transitional zoning would serve these purposes (see below).

Second, Tahoma should be allowed to retain the flexibility of its historic C-2 zone. This church has been at S. 56<sup>th</sup> and L for almost 35 years. Unitarian Universalists bought the primary property in 1985 from Southside Church of Christ, when it was already zoned C-2. (Apparently it was Southside wanting "to enlarge its complex plus provide additional off-street parking", according to a 1983 letter from its architect in city files, which ultimately led the City Council to confirm in 1984 in Resolution 28436 that "a church is a permitted use in a 'C-2' Commercial District ....")

Without directly saying so, Planning staff propose to effectively reverse that longstanding city policy, at least as to Tahoma, by the indirect route of simply taking

away the church's C-2 zoning. This would significantly restrict the church's flexibility and increase its costs for either renovating or selling in the future. (Tahoma's 177-or-so members are currently gearing up for such a major upgrade.) Are Planning staff singling out Tahoma, or similarly proposing to take away such "permitted" uses from other churches and local institutions also?

Third, if you insist on attacking the historic C-2, the far preferable and less radical change, still under Commercial, would be to Transitional zoning. Both Tahoma's situation and the city's affordable housing goals are so squarely met by Transitional that I cannot imagine why this wasn't the staff's proposed change for an existing church.

It could hardly be clearer: "Religious assembly" is a "permitted" use in all Commercial zones, according to the District use table in [Zoning Code](#) 13.06.200.C.5 (p. 13-123). According to 13.06.200.B.1 (p. 13-119), Commercial's "Transitional" is intended as a transition between commercial . . . areas and residential areas. . . . It is characterized by lower traffic generation, fewer operating hours, smaller scale buildings, and less signage than general commercial areas. Residential uses are also appropriate." (Emphasis added.) Your [Zoning Reference Guide](#) says on p. 8 that permitted uses in Transitional districts include "religious facilities, group housing, and retirement homes."

Fourth, the proposed leaps to Residential, both R-4-L and R-3, seem particularly heavy-handed and extreme. Maybe some staff member sees jumping from Commercial to Residential zoning as a panacea for "affordable housing", perhaps trying to meet some bureaucratic goal or quota. I fully support affordable housing, but it must not just be imposed top-down without due regard for the fabric of the existing community.

"Religious assembly" gets much colder treatment under Residential District zoning. It is a Conditional Use under all of the Residential zones, per the Residential District use table in [Zoning Code](#) 13.06.100.C.5 (p. 13-88). Under 13.06.100.B.7 (p. 13-82), R-4-L in particular "is intended primarily for low-density multiple-family housing, mobile home parks, retirement homes and group living facilities." It has "more restrictive site development standards" even than R-4 Multiple Family Dwelling.

So on what policy basis do the staff propose such leaps to make Tahoma's church property appeal to developers of mobile home parks, etc.? None that I can find. The most relevant Strategic Objective in the [Affordable Housing Action Strategy](#), "Create More Homes for More People", says nothing about that goal being more important than other social goals such as enabling religious assembly, nothing about pursuit of affordable housing being a justification for undermining valuable institutions such as churches. No known policy supports proposals which seems nakedly aimed at ultimately forcing my church's sacrificial sale to some opportunist in a small pool of potential buyers.

Please notify me about the progress of these proposed Amendments.

**From:** [Gary Williams](#)  
**To:** [Planning](#); [Susan Williams](#)  
**Subject:** 3610 S Tyler  
**Date:** Friday, May 3, 2019 8:39:04 AM

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Dear Mr. or Ms. Atkinson

This note is regarding the FLUM plan and as it impacts our property on S Tyler (3610 S Tyler). Tax parcel # 7090000120. There is a proposed up-zone for the properties west of Tyler St. Except for a small strip of SFR lots roughly between 35th and 37th. Creating a island of sfr's in a sea of Multi family. We are fine with the up-zone to Multi Family and think it is appropriate for the area, especially since many near by properties are High to moderate Multi family already.

We are requesting that our property be include in the plan as low density MF. Our property is particularly suited for an AUD, give its size. Thus providing for a small house addition to the Tacoma housing stock with minimal impact on existing utilities and streets.

We thank you for your consideration.

Gary Williams  
Partner, Williams Holdings  
808-938-6850

5/03/19

**From:** [John Wolters](#)  
**To:** [Planning](#)  
**Cc:** [Cady Chintis](#)  
**Subject:** Flum Comments  
**Date:** Friday, March 08, 2019 9:17:02 AM  
**Attachments:** [Screen Shot 2019-03-08 at 9.02.38 AM.png](#)

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Hello,

We're providing comments for the Land Use Changes on 6th Avenue

The area east of Sprague on 6th Avenue is a desirable area for increased housing and retail due to:

1. Walking distance to services in the Business Districts of 6th Ave and Stadium
2. On the highest frequency bus line, #1
3. Is underutilized in housing density and vacant parcels
4. Walking distance to hospitals

Suggestions

One of the largest costs making housing unaffordable is the cost of single occupancy vehicle parking. The cost to add parking can increase rent by 50% making a \$1000 1 bedroom apartment cost \$1500 if the code requires it to include parking.

Seeing that the Bus #1 travels this route every 20 minutes, it makes sense to extend the X district parking exemptions so more affordable housing can be built in this stretch of 6th from Sprague to Downtown.

Extending the 12 year multifamily property tax exemption to this area, as well as other areas where multi-family housing is allowed, would also encourage developers to build housing within this zone.

Best,  
John

John Wolters  
206.371.5152

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architecture agency

[www.wc-studio.com](http://www.wc-studio.com)



**From:** [Nicole Meyer](#)  
**To:** [Planning](#)  
**Subject:** FLUM -6TH AVE AND MONROE  
**Date:** Monday, April 22, 2019 5:25:58 PM

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Hi there,

I have received a few notifications about the Future land Use proposals, and am following up with my comments and concerns.

With the influx in population in the last few years, it makes complete sense to me for the city to look at building more multi family homes. I love the community in Tacoma, and the old homes, but I also love to see more business and money coming into the area to help it progress. However, I am concerned what this would look like for homeowners in the proposed rezoning areas.

I bought my home in 2015, and experienced a very unexpected blessing in equity as the market heated up rapidly in 2017. My husband was moved to North Carolina for a position in the Army, and I followed, fully intending to make my way back to home after his contract completed. Now that we are preparing to move home and experience all the ups and downs of a cross country transition, I am a bit alarmed that if my home was rezoned, I couldn't afford to purchase somewhere else in town.

My question is, if my home were to be rezoned, what kind of compensation would we expect? Obviously, the price I paid when I purchased would not be enough to relocate in the area, and I have no intention of leaving that area again.

Thank you for taking the time with all of the comments and concerns.

Nicole Meyer

**From:** [Kristy Fry](#)  
**To:** [Planning](#)  
**Subject:** FLUM Dometop/35th and Wright I-5 Overlooks  
**Date:** Thursday, April 18, 2019 2:43:54 PM

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As stated by many at the public information meeting held earlier this year at Stewart MS, the proposed upzone for the Eastside I-5 overlooks at McKinley Park (both ends) would be irresponsible due to the lack of basic infrastructure (no sidewalks, dangerous roads, extreme slope, missing stormwater infrastructure uphill) as well as no viable grocery shopping within a mile radius. Not to mention almost no consultation with neighborhood groups about the impact of this type of zoning.

It's not okay to add density to an underserved neighborhood, it's not okay to propose zoning that could impact view property without first providing opportunities for those neighborhoods to seek view property designations. It's not okay to take a neighborhood with roads that aren't designed for heavy traffic and add cars, it's not okay to propose zoning that is based on access to public transportation and amenities in a neighborhood that's car dependent.

No upzone until basic infrastructure can be addressed!

Kristy Fry  
3205 East L Street  
Kristyfry@hotmail.com  
253-228-6706

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**From:** [Maggie Medicott](#)  
**To:** [Planning](#)  
**Subject:** FLUM Proposed Areawide Rezones  
**Date:** Thursday, April 25, 2019 4:30:40 PM

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There are several view areas in Tacoma where the legal description includes height restriction responsibilities for property owners to protect the view of neighbors..

As a property owner in the West Slope (from N 26th to HWY 16 to Vista View to N Hawthorne) I hope you will continue to protect our view area. We do show this protection in the legal description of our properties but it has not been enforced as many of us would like. I have lived in my home for over 30 years and I can tell you the view is becoming blocked.

Please do not leave this important height protection out of the 2019 Rezoning Plan.

Thank you

Maggie Medicott  
Homeowner 1824 N Hawthorne Dr  
Tacoma, WA 98406

**From:** [Maggie Medicott](#)  
**To:** [Planning](#)  
**Subject:** FLUM Proposed Areawide Rezones  
**Date:** Wednesday, April 17, 2019 3:53:59 PM

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I have reviewed some of the Rezones for 2019. It appears that property from the corner of S 12<sup>th</sup> & S Cheyenne to S 12th & S Verde is being considered for rezoning from R2 to R3. I would like the planning commission to review all of the lots located from S 12 & S Cheyenne to S 16 & Cheyenne to be considered for the same zoning revision.

Currently some of these lots have no access yet we property owners pay taxes and utilities. Some have only ally access but the ally access is not consistent from south 12 to south 16th. The ally from S 12<sup>th</sup> to S 16<sup>th</sup> between Cheyenne and Verde in not completely punched thru. Cheyenne Street from S 12<sup>th</sup> to S 16<sup>th</sup> has yet to be installed.

I would like the planning commission review the value of this land for:

- 1) zoning change from R2 to R3
- 2) improve Cheyenne St from S 12<sup>th</sup> to S16th
- 3) improve the alley access for these properties.

Property owner,

**Margaret MEDLICOTT**

Phone: 253.219.5654

**From:** [Hally Bert](#)  
**Subject:** FLUM Rezones help with affordability & combat institutionalized racism  
**Date:** Thursday, April 25, 2019 4:26:26 PM

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Hello Planning Commissioners and Tacoma City Council,

I am writing in support of the Stadium District rezone as part of the Future Land Use Map Implementation proposed area-wide rezones.

I live in a multifamily home in this neighborhood and I think that more density in this area would be great. Tacoma is in the middle of a housing crisis and allowing for small multifamily options near transit is in line with the City's 2025 Plan and the environmental and equity goals generally.

Preserving single family zoning maintains historical racist practices of redlining and other systematic violence against people of color. Recognize that the City's public engagement process prioritizes the voices of white homeowners and ignores the many renters who are active community members.

Best,  
Hally Bert

**From:** [Racheal Villa](#)  
**To:** [Planning](#)  
**Subject:** FLUM Rezoning  
**Date:** Friday, May 17, 2019 6:33:07 AM

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Dear City of Tacoma Planning, My name is Racheal Villa. I live at 2102 Sullivan Drive in Gig Harbor . I work in Tacoma frequently and my family and I are seeking a rezone for the property at 6640 South Alaska Street and we are asking that this be done in 2019.

I would submit that this property and adjacent properties along Alaska Street provide the City with the unique opportunity to locate multiple families within walking distance of so many assets. As you know, the whole local area including the corner of Alaska Street and 72nd down to the previous St. Anne's property is adjacent to groceries, restaurants, Wapato Park for recreation, and other amenities, including public transportation. I'm in favor of more housing, not less, to be allowed within walking distance of the necessities of a healthy lifestyle.

Thank you for your attention.  
Respectfully,

Racheal Villa

**From:** [Nadiya Sheckler](#)  
**To:** [Planning](#)  
**Subject:** FLUM: comments on the draft proposals  
**Date:** Friday, May 17, 2019 2:28:17 PM

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Dear Planning Commission,

Growth and development is necessary to support the demand for housing. Thank you for working to shape the region.

To build safe and connected communities, we need quality sidewalks and infrastructure to support increased populations. We also need district design review committees to retain the neighborhood charm and character. Please hold back on zoning changes that could drastically impact many iconic neighborhoods, until you have created district focus groups to hold developers accountable. The impact they have when not held to a visually appealing design with sustainable construction would be a scar on the legacy of your influence.

NE Tacoma is an area that would benefit from many zoning changes near major arterial transit corridors. Please consider greater zoning expansions, more multi-family and neighborhood commercial. The area has the transit centers and resources for expansion. It will need sidewalks and safer crosswalks closer together to support the proposed and future growth plans.

Thank you,  
Nadiya Sheckler  
206.883.4558

**From:** [Isenberg](#)  
**To:** [Planning](#)  
**Subject:** FLUM/redone question  
**Date:** Tuesday, April 23, 2019 5:57:08 PM

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Hello,

The interactive map (thank you) shows very specific lots near the intersection of N Alder and N 26th to be changed from R2 to R3. Lots on N 27th and N 28th between Alder and Union are coded as “base lots.” Is there a plan to change these property zoning codes to R2 or R3?

Appreciatively,  
Bob Isenberg  
3213 N 28 St  
98407

**From:** [Deb Olsen](#)  
**To:** [Planning](#)  
**Subject:** FLUM/REZONE for S 84th & Park Ave  
**Date:** Thursday, May 16, 2019 6:41:26 PM

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Concerning the FLUM/REZONE proposal on S 84<sup>th</sup> and Park Ave (Fern Hill Neighborhood):

We are property owners of commercial property (historic building) on the corner of S 83<sup>rd</sup> & Park. We have owned, lived and worked at this address for over 45 years (since 1973). We strongly object to the city proposal to rezone this small area of the Fern Hill neighborhood from single family to R-4L. The whole idea seems unnecessary and counterproductive.

Our main concern is with the properties on Park Ave north of 84<sup>th</sup> St, although our issues also apply to the entire area.

The Fern Hill neighborhood is historic, but the “improvements” we have seen over the last few decades have not enhanced its historic character. We have commented on this for past variances to the code when apartments were built and a lot was divided to put a full-size house in what had been a normal-size backyard. The line of historic homes that sat attractively on the east side of Park Ave now have parking lots in their front yards, due to lots being sold off behind and built on (including the previously mentioned back-yard build). The change in zoning from single family to R-4L would further degrade this historic neighborhood.

Specific concerns:

- No room for additional parking on Park Ave. There is no alley behind this block to help with traffic and parking.
- Already too much traffic on Park Ave, which is supposed to be a “bicycle boulevard.” Why add more density and traffic to a street you are trying to divert traffic from?
- S. 82<sup>nd</sup> at Park Ave is especially narrow with no shoulder. Why increase density here?
- Insufficient reasons for a rezone: There is nothing about the small nearby parks, community facilities, bus service, or the tiny Fern Hill Business district that justifies changing the single-family zoning for this little section of the neighborhood. The “historic” business district has lost its longest tenant – the post office – and the whole nature of the block could change at any time.
- All the rezoned lots would require the demolition of vintage/historic single-family homes to take advantage of the new zoning and further degrade the historic nature of the neighborhood.

There is so much vacant property along Pacific Ave, we just don't see any good reason why the city would target this small area for more density. Why continue to degrade this historic neighborhood? Could you please just leave well enough alone?

Thank you,  
Debra & Timothy Olsen  
8222 S Park Ave  
Tacoma



**From:** [George Chambers](#)  
**To:** [Planning](#)  
**Subject:** FLUM/REZONE  
**Date:** Thursday, May 16, 2019 10:28:17 AM

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Greetings my name is George Chambers. My family owns the property at 6640 So. Alaska. I wish to petition for the comprehensive rezone of 72nd and Alaska, as well as the rezoning of our property.

At the last city FLUM meeting we were given a list of criteria that would be needed to consider R4L. I believe we meet these considerations, and would like to see this type of rezone seriously contemplated.

As we all know Tacoma is growing rapidly, and this rezone could help with a growing housing shortage.

Our property has seen many changes over the years, and is no longer the quiet place we grew up to. Interstate 5, McCord flight path, Winco, we've lived through it all. We know this trend is going to continue into the foreseeable future, shouldn't we plan for the inevitable?

Thank you.

George chambers  
253 722-7346

[Sent from Yahoo Mail on Android](#)

**From:** [Joshua Bellinghausen](#)  
**To:** [Planning](#)  
**Subject:** Future Land Use Implementation  
**Date:** Wednesday, April 17, 2019 4:43:11 PM

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Hello,

I live adjacent to the proposed rezone area just south of Jefferson Park. I am strongly against rezoning this area into R4L Multi-Family Low Density housing. I believe it will do nothing to improve the neighborhood and instead it will create a dead zone in between two sides of the neighborhood. Right now this area has an abundance of potential for young adults and working class urbanites. Currently, businesses like Beer Star and Da Tiki Hut are on one side of the proposed rezone and West End Pub and other business on the other. The area is separated by Jefferson Park in the middle. If this is rezoned to R4L it will make a long stretch of road unwelcoming to those walking and exploring 6th. Instead help the neighborhood embrace the suburban/urban interface we currently enjoy. Instead of turning multiple blocks of 6th ave into group living facilities, help the area grow by zoning the road into more businesses. Or if higher population density is a priority, zone the area in to R-3. This would bring life to an area of Tacoma that has so many businesses that appeal to young adults (yoga, crossfit, beer bars, float tanks, vintage clothes, etc.) If this area is zoned to R4L, then retirement homes and group homes would make a dead zone in an area that should be used for people who walk and explore their city.

I strongly object to the rezoning of 6th ave into R4L, and I hope you will too.

Thank you,  
Josh Bellinghausen

**From:** [Susan](#)  
**To:** [Planning](#)  
**Subject:** Future Land Use, 72nd & Alaska  
**Date:** Sunday, April 28, 2019 3:25:25 PM

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Public comment:

I am concerned about the traffic at 72nd and Hosmer if a multi-unit, high-density land use change goes into effect by Wapato park.

Traffic is horrible and getting WORSE even without this plan change. Often the traffic is backed up almost and to Sheridan Avenue when heading toward the West on 72nd Street. Also bad coming from West toward East.

Has this been studied?

Sincerely,

Susan Walters  
7306 S. I Street  
253-720-1783

**From:** [MICHAEL B.](#)  
**To:** [Planning](#)  
**Subject:** Fw: R-4 Multi-Family District High Density Zoning  
**Date:** Sunday, May 05, 2019 4:00:18 PM

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## Proposed Multi-Family High Density Re Zoning

----- Forwarded Message -----

**From:** MICHAEL B. <myworld511@yahoo.com>  
**To:** Catherine.Ushka@cityoftacoma.org <Catherine.Ushka@cityoftacoma.org>  
**Sent:** Sunday, May 5, 2019, 5:56:57 PM CDT  
**Subject:** R-4 Multi-Family District High Density Zoning

My name Michael Bergeron, I live at 1017 E 30th ST Tacoma 98404.. I am contacting you in regards to the proposed zoning change on East L St. & E 29th St. area. A lot of my neighbors and I are very concerned and opposed to this plan.. This area is not meant for or suitable for high rise multi family housing, the parking on the streets and accessibility to places on are roads are very limited, not to mention the lose in value of the homes in the neighborhood and surrounding area and lose of the view we have had for many years. And they say it will help in affordable housing, I call that a joke, high rise Apartments with a view affordable? , lets be honest! The surrounding neighborhood has long been a quite area, a lot of people have been here for many years. Apartments bring in traffic and many people and sometimes people bring trouble! we are not willing to accept that!

Thank you, Michael Bergeron  
253-389-1052

**From:** [PATRICK AND PAMELA DUGGAN](#)  
**To:** [Planning](#)  
**Subject:** Fwd: Proposed E L St & E 29th St rezoning  
**Date:** Tuesday, May 14, 2019 7:27:26 AM

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----- Original Message -----

**From:** PATRICK AND PAMELA DUGGAN <pduggan52@comcast.net>  
**To:** Catherine.Ushka@cityoftacoma.org  
**Date:** May 14, 2019 at 7:25 AM  
**Subject:** Proposed E L St & E 29th St rezoning

Please help us stop the rezoning of East L Street and East 29th Street to a multi family high density allowing high rise apartments to ruin our views and congest our neighborhood. This is a terrible proposal and will negatively impact us. Do not let greed run over us on the Eastside of Tacoma because we are not wealthy and powerful. Please help protect what we have worked so hard for...and help us protect our neighborhood.

Also we need your help to add view sensitive district overlay to protect our property values.

Please help us. Thank you. Pamela and Patrick Duggan..3102 East J Street Tacoma Wa 98404...253-376-4824

**From:** [PATRICK AND PAMELA DUGGAN](#)  
**To:** [Planning](#)  
**Subject:** Fwd: Proposed rezoning East L and East 29th Streets  
**Date:** Wednesday, May 15, 2019 7:47:58 AM

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----- Original Message -----

**From:** PATRICK AND PAMELA DUGGAN <pduggan52@comcast.net>  
**To:** Catherine.Ushka@cityoftacoma.org  
**Date:** May 15, 2019 at 7:46 AM  
**Subject:** Proposed rezoning East L and East 29th Streets

25 year residents of the Eastside opposing the proposed rezone L Street and both sides of E. 29th to a multiple family high density zone. Our neighbors succinctly listed our objections. We will sight their observations.

1. The qualities of our neighborhood aren't congruent with criteria for zoning. Access roads are narrow and poorly maintained, there is on street parking, not walkable to public due to limited side walks, quality of side walks and hilly terrain. Not walkable to public transportation.
2. No view protection: East Tacoma doesn't have View Sensitive District Overlay like much of North Tacoma does that prevents new development from exceeding 25 feet in height and protects homeowners property value. Therefore the View Sensitive Overlay isn't consistently applied city wide.
3. Strawberry Hill and McKinley Park are historic neighbors dating back to 1900. Tearing down homes and building large apartment complexes will forever change this residential community and conflicts with historical preservation efforts that unfortunately are also not equally distributed throughout Tacoma.
4. Approximately 50% of high density rezoning is happening in lower income communities like East and South Tacoma compared to North Tacoma and North East Tacoma.
5. The city is marketing this change for more affordable housing and to meet housing demands. Affordable housing with a view? Likely there are other interest involved. Also affordable housing can be accomplished in other ways besides increasing large rentals. Alternatives include allowing mother in law detached rentals for current homeowners. And home ownership! East Tacoma is more of the affordable housing compared to other districts...tearing down homes to build large apartment complexes is contradictory. Plus, efforts are city wide. Remember it is happening in a few districts.

Thank you. Please help us prevent this zoning proposal.. Pamela and  
Patrick Duggan East J Street. 253-376-4824

**From:** Andre St. Hilaire  
**To:** [Planning](#)  
**Subject:** Historic Preservation/Opposition to rezoning of historic neighborhoods  
**Date:** Sunday, May 05, 2019 12:09:05 PM

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To whom it may concern,

I am writing you to express my concern for historic preservation in Tacoma and to advocate in particular for the preservation of the 400 block of North Tacoma, G, and Yakima. I'm aware that the planning commission is currently in conversation about a potential rezone to this area.

As our city celebrates the beautiful restoration of the Elks building and looks forward to the excitement brewing with the rejuvenation of Old City Hall, I can't help but wonder what would have happened if instead we had a 1980's office tower or a 1990's apartment complex in replacement of these iconic Tacoma buildings.

Our historic homes, neighborhoods and buildings are part of what give Tacoma personality and a vibrant quality of life that surpasses other Northwest cities. These historic homes are irreplaceable. If we continue to "Ballardize" the Stadium District and push upon the architectural integrity of the North Slope we are compromising what makes Tacoma's neighborhoods so great.

Rezoning decisions that destroy some of the most beautiful architecture in the city is irresponsible when parts of our downtown are starving for redevelopment. Why threaten thriving neighborhoods when there are empty lots, empty buildings, blight and opportunity downtown?

I want to live in an affordable city and I support development that is mindful of livability. However, I'm concerned that the often bland and expensive apartment buildings that threaten to replace historic homes do so at the expense of our sense of community and neighborhood identity.

I am asking you as city leaders to advocate for development that respects what makes Tacoma a place we are proud to call home—with neighborhoods and homes that are distinct and cared about.

Sincerely,  
Andre St Hilaire

**From:** [Natalie Morton](#)  
**To:** [Planning](#)  
**Subject:** In Support of the Stadium District Rezone  
**Date:** Friday, April 26, 2019 4:59:32 AM

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Hello Planning Commissioners and Tacoma City Council,

I am writing in support of the Stadium District rezone as part of the Future Land Use Map Implementation proposed area-wide rezones.

I grew up in the North Slope where my parents owned a home and I think that more density in this area would be great. Tacoma is in the middle of a housing crisis and allowing for small multifamily options near transit is in line with the City's 2025 Plan and the environmental and equity goals generally.

Preserving single family zoning maintains historical racist practices of redlining and other systematic violence against people of color. Recognize that the City's public engagement process prioritizes the voices of white homeowners and ignores the many renters who are active community members.

Best,  
Natalie Morton

**From:** [Tami-Lyn](#)  
**To:** [Planning](#)  
**Date:** Monday, May 13, 2019 1:10:12 PM

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I own property at 2901 E. Upper Park St. I'm against the proposed zoning changes. I'm hearing the city is using the platform of needing affordable housing. I'm sorry a high rise apartment complex with the view these buildings would contain is going to be anything but affordable. I own another complex on E. Wright Ave. the condo the city allowed to be built there took out all our views and the units are anything but affordable. I plan to gather up several neighbors in my area to fight this proposed zoning change. Our area houses McKinley park, a gem in the city which has historic priveledge.

**From:** [mrhandymansr@gmail.com](mailto:mrhandymansr@gmail.com)  
**To:** [Planning](#)  
**Date:** Wednesday, May 08, 2019 3:51:02 PM

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My name is Larry Talbert. I am writing you to share my wife's and my disappointment with the way we and our neighbors on Strawberry Hill (E L St & E 29<sup>th</sup> St) are being regarded in the proposed 2019 Comprehensive Plan and Land Use Amendment Future Land Use implementation. For the record, we do not support this proposal for our neighborhood. My wife and I have lived in our home here on the hill (3127 East K St) since 1964. As with most of the East side of Tacoma, city services/amenities have been few and far between during the past fifty-five years. Now you want to change the zoning guidelines to take what little we do have, a quiet, peaceful neighborhood into a measurably busier environment. Our streets will become much busier and our neighborhood children more at risk. Based on prior performance I don't expect any improvement in city services to abrogate the negative impact the proposed zone changes will, without a doubt, inflict.

As another example of the city's regard for this neighborhood, this proposed zone change seems to have been announced in the dark of the night. I would think at the very least obvious signage should have been posted to get our attention that something is being proposed that may have an effect on our neighborhood. The absence of that very basic of warnings goes to further illustrate what little regard the city has for our opinion and well-being. Your proposal to change this neighborhood from a multiple family low density zone to a multiple family high density zone is bad planning. The proposed area is far removed from access to public transit. It is even further isolated from even the most basic of services, namely grocery stores. In our opinion this is nothing but another feel good implementation of bad policy by the city to make it look like it supports affordable housing, when in truth it only supports realtors and landlords by giving them prime view property on which to capitalize.

Sincerely;  
Larry & Gail Talbert

**From:** [Stephen Wilson](#)  
**To:** [Planning](#)  
**Subject:** Narrows Remodeling  
**Date:** Saturday, April 20, 2019 7:04:00 PM

---

I am concerned about the Narrows Rezoning for 384 low income housing units and want it pulled off the Tacoma Master Plan.

Steve Wilson  
1304 S. Sunset Dr Tacoma, Wa

Sent from my iPhone

**From:** [Tara Mitra](#)  
**To:** [Planning](#)  
**Subject:** Narrows Rezoning be taken off the master plan  
**Date:** Monday, March 11, 2019 8:12:37 PM

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To Whom It May Concern,

I oppose the City's rezoning plan for the Tacoma Narrows area. This is Tacoma - not Seattle! Let's keep it that way - small and quaint where you know people wherever you go, that is what I love about this city and has kept me here for almost my entire life and my neighbors for over 60+ years. It took years for Tacoma to get cleaned up and get it where it is today. This plan seems like we are going back in time rather than moving forward in a positive direction. With the rezoning it brings in additional crime, heavier traffic to our area that streets can not handle and crowd our schools even more. Why not use areas like downtown Tacoma that are sitting empty rather than disrupting our neighborhoods? It is poor planning on the City.

I am currently a full time student at TCC and I am totally against the rezoning, low-income "affordable" housing projects the City is planning. It makes absolutely NO sense! Based upon the "true" student population most of these students either live at home, live with a host family or have other housing situations. There are VERY, VERY few students who actually NEED and will benefit from the rezoning and low income housing. It will only harm our beautiful, historic, comfortable communities - what makes Tacoma great!

Thank you for your time and consideration.  
Tara M.

**From:** [Sheryl Diamond](#)  
**To:** [Planning](#)  
**Subject:** Narrows rezoning  
**Date:** Tuesday, March 12, 2019 10:37:24 AM

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We strongly request the "Narrows Rezoning" be taken off the Master plan.

Andrew & Sheryl Diamond

7302 So. 16

Tacoma, Wa 98465

**From:** [mj@thetravelcompany.net](mailto:mj@thetravelcompany.net)  
**To:** [Planning](#)  
**Subject:** Neighborhood rezone  
**Date:** Thursday, April 25, 2019 5:26:03 PM

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Planning Commission Members:

Please be careful when taking these rezones into consideration. I have seen firsthand, in Los Angeles and San Francisco, what can happen when density becomes a by word for development.

Infrastructure and parking become a tremendous issue. Once people begin living on top of each other tempers flare and police and fire must grow to accommodate the issues that arise. Higher buildings mean less privacy and less sunlight, that too takes a toll. Schools become overwhelmed and taxes begin to rise to meet the new demands. The loss of historic homes and structures is something that cannot be undone . “affordable housing” is something that does not seem to happen, even with the best of intention and current residents of the city are priced out or simply flee the destruction of their once cherished neighborhoods.

You and the current City Council will forever be linked with what occurs.

*MaryJo Strom Copland  
3217 North 28<sup>th</sup> Street  
Tacoma*

**From:** [Katie Dailey](#)  
**To:** [Planning](#)  
**Subject:** Opposition to rezoning Stadium historic neighborhood  
**Date:** Sunday, April 28, 2019 8:29:07 PM

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Tacoma Planning Commission Members:

My husband and I are the owners of the craftsman home at 415 N G Street, a beautiful, historic house particularly poised to be impacted by the potential rezoning of the Stadium/Seminary district. We are relative newcomers to Tacoma and settled here because we loved that the area had more character and diversity than many cities farther north. In combination we have lived in 8 states and even more cities and we have never seen a city with as many unique, historic homes as Tacoma. It is part of what motivated us to settle here. We understand that when it comes to matters of public policy sentiments don't solve problems, but it would be devastating to us to see the Stadium district lose its historic homes to apartment buildings.

Sentiments aside, we also have serious concerns regarding how the infrastructure of this neighborhood could handle increased density of occupants. To the front and back of our home we are surrounded by multi-family homes and there is rarely a time when the street parking in front of our home is vacant. Street parking is a serious commodity here and the number of cars that line many of the busy streets like Yakima and I Street can make crossing those streets dangerous for pedestrians and cars alike. More apartments would make a bad situation even worse.

Much of the argument for the rezoning in the North End stems from the need for more affordable housing, but more density does not mean more affordable. North End properties are in great neighborhoods with beautiful views. It is hard to believe that a developer would pay a premium for this land and put in affordable housing. To focus the rezoning efforts on some of the already most desirable neighborhoods in the City doesn't make sense as a solution to increasing affordable housing.

There are large areas in Tacoma that could benefit hugely from development. The Hilltop neighborhood in particular is centrally located, has great views, and more homes in need of repair. It has properties at a price that would facilitate building of affordable housing, and it is located along the new Tacoma Link expansion. The Sixth Avenue District and the area around Pacific Avenue and S 38<sup>th</sup> street also seem like natural places to continue development. These areas of Tacoma have small businesses that would benefit from increased density of residents and many of these neighborhoods are better suited for apartments.

The residents in the Stadium District are upstanding and involved citizens in Tacoma who could live other places in the Seattle area. The feeling in our neighborhood is that if the rezoning passes, many residents will take their income to areas that allow them to have the beautiful single-family homes they desire. Many of the residents in this area have worked hard to earn the ability to live in such a desirable neighborhood and bringing in apartment buildings will absolutely drive people away. This city is big enough to maintain these historic single family homes and still create higher density, affordable housing elsewhere.

We recognize the housing shortage problem that is affecting our area but feel that the proposed rezoning will not only NOT result in increased affordable housing but will degrade the value and character of the neighborhoods integral to Tacoma's heritage. There are many cons to the rezoning of the Stadium/Seminary district and very few pros. These beautiful,

historic homes deserve to be protected. The current zoning in the Stadium/Seminary district allows for some affordable housing options while preserving the historic homes. Please help our neighborhood maintain it's historic value by not approving the rezone of the Stadium/Seminary district. We urge the City Council and Planning Commission to consider all of the options when determining a solution to our City's need for increased affordable housing. We urge the City Council and Planning Commission to consider all of the options when determining a solution to our City's need for increased affordable housing.

Sincerely,

Kory and Kathryn Botelho

**From:** [David Eichner](#)  
**To:** [Planning](#)  
**Subject:** Opposition to rezoning Stadium historic neighborhood  
**Date:** Friday, April 26, 2019 7:43:23 AM

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Having recently heard what is being planned to destroy the historic nature of our Stadium Neighborhood, I am emailing you to voice my strong opposition to rezoning our wonderful historic Stadium neighborhood.

David Eichner, CPA

**From:** [Katie Dailey](#)  
**To:** [Planning](#)  
**Subject:** Opposition to rezoning Stadium historic neighborhood  
**Date:** Monday, May 13, 2019 8:21:34 PM

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Tacoma Planning Commission:

My husband and I are the owners of the craftsman home at 415 N G Street, a beautiful, historic home particularly positioned to be impacted by the proposed rezoning of part of the Stadium district from R4L to R4. We attended the information session and planning commission meeting on May 1, 2019 and now have a much better understanding of the purpose, process, and focus of the rezoning. Given our better understanding we wanted to resubmit some comments for your consideration.

1. During the information session, it was stated that part of the policy context was to “maintain neighborhood patterns” through the rezoning.

Rezoning the Stadium district to R4 would allow large apartment buildings to become a part of our neighborhood, which goes against our current neighborhood pattern. Our historic neighborhood was originally filled with single-family homes and has already been changed by the presence of small apartment buildings and multi-family homes. Allowing large apartment buildings would remove this historic neighborhood one more step from its original character.

2. It was stated during the information session that many of the areas proposed to be rezoned were proposed to create “transitional zones” between mixed use and R2/R3 single-family homes. Our current zoning as R4L already creates a transitional zone between the commercial and residential areas, and the current building height restriction helps to maintain some of the character of the neighborhood and exterior character of many of these historic homes. Up-zoning to R4 would encourage developers to destroy these beautiful 100+-year-old homes to create modern apartment buildings at odds with the historic character of the neighborhood. Our current zoning is a reasonable compromise between the City’s goals and the resident’s desires.

3. The question of infrastructure issues like parking, traffic, sidewalks, etc and maintaining the aesthetics and neighborhood feel came up multiple times in the information session. Each time the lead planner stated that these issues would be considered at later stages as projects are being planned. This is short-sighted and inappropriate. The Stadium district cannot handle the current volume of cars. Driving and walking in many areas here is dangerous due to limited visibility. Adding more apartments without addressing infrastructure would be bad for residents and would also be bad for the Stadium High School students trying to walk to school each morning. Maintaining the historic feel of the neighborhood is critically important to us and many of our neighbors. The city cannot rezone areas without first considering these issues. Once rezoning has passed we will have little to no control over these issues, and some other department will pass the buck. The Planning Commission and City Council should plan for and consider these concerns prior to making important decisions like rezoning.

4. The blocks proposed to be rezoned to R4 lie in the

Stadium-Seminary Historic District as recognized by the National Register of Historic Places. Last weekend there were hundreds of people who paid money to walk through our neighborhood and tour homes on the Historic Homes of Tacoma Tour. This area and neighborhood is special and must be maintained. The following verbiage is from the Tacoma Municipal Code, Chapter 13:

“13.07.020 Landmarks and Historic Districts - Declaration of purpose and declaration of policy. The City finds that the **protection, enhancement, perpetuation**, and continued use of landmarks, **districts**, and elements of historic, cultural, architectural, archeological, engineering, or geographic significance located within the City are **required in the interests of the prosperity, civic pride, ecological, and general welfare of its citizens. The City further finds that the economic, cultural, and aesthetic standing of the City cannot be maintained or enhanced by disregarding the heritage of the City or by allowing the destruction or defacement of historic and cultural assets.** The purpose of this chapter is to:

A. **Preserve and protect historic resources**, including both designated City landmarks and historic resources which are eligible for state, local, or **national listing**;

B. Establish and maintain an open and public process for the designation and maintenance of City landmarks and other historic resources which represent the history of architecture and culture of the City and the nation, and to apply historic preservation standards and guidelines to individual projects fairly and equitably;

C. Promote economic development in the City through the **adaptive reuse of historic buildings, structures, and districts**;

D. **Conserve and enhance the physical and natural beauty of Tacoma through the development of policies that protect historically compatible settings for such buildings, places, and districts**;

E. Comply with the state Environmental Policy Act by preserving important historic, cultural, and natural aspects of our national heritage; and

F. To promote preservation compatible practices related to cultural, economic and environmental sustainability, including: **conservation of resources through retention and enhancement of existing building stock**, reduction of impacts to the waste stream resulting from construction activities, promotion of energy conservation, stimulation of job growth in rehabilitation industries, and promotion of Heritage Tourism;

G. To contribute to a healthy population by encouraging human scale development and preservation activities, including walkable neighborhoods; and

H. Integrate the historic preservation goals of the state Growth Management Act and the goals and objectives set forth in the City’s Comprehensive Plan and regulatory language. (Ord. 27995 Ex. H; passed Jun. 14, 2011: O”

The City’s municipal code clearly states that historic preservation is a priority and has many elements that apply to this specific type of issue. The rezoning of even a portion of the Stadium district to R4 goes in direct opposition to the policy above. It is our hope that the Planning Commission and the City Councilors will consider the above points, abide by the current verbiage in the Tacoma Municipal Code, and vote against the rezoning of this portion of the Stadium District to R4.

Sincerely,

Kory and Kathryn Botelho



**From:** [Rod Cory](#)  
**To:** [Planning](#)  
**Subject:** Opposition to rezoning Stadium historic neighborhood  
**Date:** Friday, April 26, 2019 8:12:33 AM

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There are other areas to build new high rise apartments that would benefit more people than expensive view apartments in the Stadium District.

Destroying historic homes is not a solution.

Having recently heard what is being planned to destroy the historic nature of our Stadium Neighborhood, I am emailing you to voice my strong opposition to rezoning our wonderful historic Stadium neighborhood.

The rezoning of Tacoma is destroying the beauty and lure of our City.

Rod Cory

**From:** [Ryan Davis](#)  
**To:** [Planning](#)  
**Subject:** Please preserve the historic character of 400 blocks of N. Tacoma, N. G, and N. Yakima Streets  
**Date:** Wednesday, April 24, 2019 2:42:30 PM

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Hello, I am a nearby resident to this neighborhood and think it is unparalleled in both the city and the region. We are in the tourism industry and know that people travel from around the country to enjoy this historic area. Please do not jeopardize this unique place. It cannot be undone! I think converting historic homes to apartments is fine, but please do not allow large scale redevelopment of these irreplaceable homes. With the light rail coming in, now is the time to protect this history of Tacoma.

Ryan Davis  
624 N I st  
Tacoma, WA

**From:** [Carol Farer](#)  
**To:** [Planning](#)  
**Subject:** Proposed areawide rezones public comments  
**Date:** Wednesday, May 15, 2019 3:52:32 PM

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I attended the May 1st informational meeting and planning commission public hearing. The overwhelming response I heard in the testimonies was against the spot rezoning and inconsistent implementation of the rezoning criteria, which calls into question the credibility of the planning staff.

Testimony which elicited loud applause criticized the flawed planning process for not including design input and a comprehensive plan. Residents are concerned about changes that will adversely affect the character of their neighborhoods, like parking impacts, new building construction replacing valued older houses and trees, and loss of views.

The multistory developments in the Proctor district have given us a preview of how neighborhoods can be adversely affected by development. Both residents and workers in the area deplore the developments. I used to go to the Stadium district regularly for services, but now avoid it due to the inadequate parking. No one that lives there wants to see more condos and apartments replacing the beautiful older homes. I lived in the Ballard neighborhood in Seattle prior to its transition into something unrecognizable from its former character, so I've been through this before.

I live in the 26th & Alder area, where all the housing stock is being highly used. The neighbors I talked to within many blocks expressed the same sentiments shared at the May 1st meetings. There is also concern about preserving the historic building that houses the convenience store.

Any development is not good development. Please stop action and take a hard look at redoing this planning process.

Sincerely,  
Carol Farer

**From:** [Debbie Hill](#)  
**To:** [Planning](#)  
**Subject:** Proposed potential rezone North Yakima etc.  
**Date:** Wednesday, April 24, 2019 10:31:50 PM

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Dear Planning Commission,

It is almost inexplicable to me as to why anyone would think that the proposed rezoning the area of N. 4<sup>th</sup> St./N. Yakima/N G St. to R-4 and putting up high-density apartments/condos is a good idea. It looks to me like someone looked at a map and thought that area would be convenient to shopping and schools but considered nothing else such as how such a development would fit in the surrounding community. This idea feels sadly familiar when one looks at the Proctor Station and Madison 25 condo high-rise buildings in the Proctor area, which not only do not fit or suit the Proctor area but are so out of tune with the surrounding neighborhoods as to be weird and depressing.

I know that developers always want the most desirable neighborhoods in which to put their developments and that, of course, this immediately ruins the value and character of those same neighborhoods, but the developers do not have to care about that. They won't be around the moment the high-rise is finished to see the negative impact on the neighborhood. But the City of Tacoma is obligated to have more care in planning. When Proctor Station was in the planning stages, Proctor neighbors came to almost universally decry this idea. Concerns about parking, traffic, preservation of historic buildings, and maintenance of nearby Puget Park were cited among many other concerns. City planners listened very politely and then went right ahead and allowed it to be built anyway.

In the case of the N. Yakima/N. 4<sup>th</sup>/N. G Streets, the area in question is full of historic homes. The Rust Mansion at N. 5<sup>th</sup> and Yakima is on the Historic Register. It just sold for well over \$1 million; what incentive will there be for homeowners in this neighborhood to purchase and/or maintain/restore their homes if the city is just going to rezone and put up high-rise apartments across the street? The Tacoma Historical Society hosts yearly tours of historic homes in this area which is a major draw for both Tacomans and those from out-of-town. Many people do not realize that Tacoma is home to beautiful, architecturally unique, significant, and historic homes that simply could not be built today: The cost would be astronomical and the materials are often not available. These homes illustrate much of Tacoma's history as the City of Destiny as the end of the railroad line. In addition, North Yakima street is a quiet, tree-lined neighborhood street that holds increasingly rare beauty, tranquility, and refuge in a world that is ever-more crowded and full of ugly and unimaginative high-rise buildings that bring traffic, noise, congestion, and no parking.

At the risk of sounding like another NIMBY person, I'm here to say Not in These Front Yards. Tacoma's west end and areas in the south are full of locations where such buildings can be put

up with no impact on anyone. Public transit is readily available and one can be in downtown Tacoma in minutes. In fact, these locations would also spread out the density and mitigate the congestion that so plagues Tacoma the closer you get to downtown Tacoma these days.

It is not fair to property owners in neighborhoods such as the one in question here that their beautifully maintained and sometimes restored homes could be used as bait for developers who then move in like vultures and ruin the very neighborhoods they know are so valuable. It is also rather a tragedy in the making that Tacoma's history would be so ignored and devalued that historic buildings are consigned for demolition without a second thought. I would like to think that the Planning Commission and the City would be mindful of this and would work to keep zoning that would protect Tacoma's historic heritage as the invaluable asset that it is.

It is a nice goal to try to mix up neighborhood populations and densities and I realize there is a balancing act involved in doing so. However, just going according to a map of Tacoma and sticking extremely inappropriate developments into whatever neighborhood seems convenient at the moment will only work to ruin beautiful areas, aggravate congestion, traffic, and parking issues, and will not serve anyone in Tacoma.

I hope you will give due consideration to these comments.

Sincerely,

Deborah Hill

**From:** [Marilyn Bennett](#)  
**To:** [Planning](#)  
**Subject:** Proposed re-zoning of North End neighborhoods in Tacoma  
**Date:** Tuesday, May 07, 2019 9:57:23 AM

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Dear Members of the City of Tacoma Planning Commission:

My husband and I attended two public meetings concerning the proposed re-zoning of our North End Tacoma neighborhoods. During the Public Hearing on Land Use Code amendments, conducted May 1, 2019, in the Council Chambers of the Tacoma Municipal Building, some key points of opposition to the proposed amendments were expressed by concerned citizens.

A licensed urban planner and architect who lives in Tacoma and received his degrees at the University of Washington had some pointed remarks for the planning commission. His major points included the following:

The planning commission itself is process oriented and not design oriented. There are no architects or urban planners on the commission. Studies of urban development in other cities (Seattle, Chicago), suggest that scattered upzoning in small areas throughout the city is the wrong way to go. Such piecemeal zoning changes can invite absentee landlords into stable neighborhoods, leading to buildings that are under-attended in terms of care, maintenance and proper use. He mentioned the study of development along Aurora Ave ( Hwy 99) in Seattle as an example of what not to do. If one needs further evidence, go to the Ballard vicinity in Seattle, west of 15th Ave and North of Market. Those neighborhoods have been functionally destroyed by three-story town homes crammed onto lots with little set-back, their primary entrance facing a 12' wide alley with no easements. Parking is literally non-existent.

In Tacoma, there are already many multi-use hub areas with access to public transportation that are under-utilized and could be targeted for R4 multi-family use Areas along South Tacoma Way, and a defunct mall in University Place, for example, meet the stated criteria of the master plan and the planning commission, and could be developed without impacting existing neighborhoods like N. 26th and N. Alder and N. 34th and Proctor.

Tacoma should take a hard look at how existing properties are used before trying to satisfy the projections of the Comprehensive Plan. Failing to do so, and continuing to upcode residential pockets throughout the city, will lead to the degradation of high-quality and desirable neighborhoods throughout Tacoma, and fail to complete and upgrade areas already zoned for multi-family and commercial use.

Sincerely,  
Peter Pendas  
Marilyn Bennett  
N. Alder Street, near N. 28th St., Tacoma

Marilyn Bennett  
[marilyn.bennett60@gmail.com](mailto:marilyn.bennett60@gmail.com)  
Artistic Director, Toy Boat Theatre  
google: TOY BOAT THEATRE CO

**From:** [Tom](#)  
**To:** [Ushka, Catherine](#); [Planning](#)  
**Cc:** [thomas.maxwell@kdrp.com](mailto:thomas.maxwell@kdrp.com)  
**Subject:** Proposed re-zoning  
**Date:** Wednesday, May 15, 2019 10:32:01 AM

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Dear Counsel members,

I recently attended a public meeting on the proposed re-zoning of my neighborhood of Strawberry Hill. Upon attending the meeting I was informed that the re-zoning was to change from single family to R-4L zoning which I felt was appropriate to the neighborhood.

Upon research I have discovered that it is not R-4L proposed, but R-4 re-zoning that is proposed. I feel there are many problems with this re-zoning:

1. Current access roads are not adequate for high density housing, they do not allow adequate access for the proposed high density population, there is also no public transportation access either.
2. East Tacoma does not have an acceptable View Sensitivity District overlay such as North Tacoma. This means the current residents are not being properly represented by the current administration. Why are these standards applied to North Tacoma, but not to East Tacoma? These 60 foot buildings do not fit in with the current single family housing that is currently in the are. I notice your own proposal notes "3. This area has view potential". This proposal would ruin that for your current constituents. Currently standards of R-4L would take care of that.
3. Strawberry Hill and McKinley Park are historic areas in the city of Tacoma going back to 1900. The proposed High Density Housing would forever change this residential community and conflicts with historical preservation efforts that are unfortunately not evenly distributed throughout Tacoma.
4. A possible solution to this problem would be to make the whole neighborhood of Strawberry Hill and McKinley Park area re-zoned instead of simply a small part of it to put everybody on an even playing field, rather than giving advantage to only a small area, while taking away from the rest.

Please take the requests of your constituents in mind while making your decisions about our home.

Thomas Maxwell  
1114 East 31s Street  
Tacoma, WA. 98404

**From:** [Barbara](#)  
**To:** [Planning](#)  
**Subject:** Proposed Zoning change R4L  
**Date:** Sunday, May 19, 2019 12:26:57 PM

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I would like to register my concern for the proposed re-zoning of R4L from multi-family district low density to multi-family high density with an amendment for allowing building height to reach a maximum of 165 feet.

These changes would allow the building of high-density apartments or condominiums and cause or worsen the following:

- Reducing property value for all residents on either side of E L St from E 29th to the 3200 block.
- Increasing the risk to the residents who walk to access local parks and businesses, as there are no sidewalks, due to increased traffic,
- Increase wear and tear on the already highly traveled roadways,

The only parties that would benefit from this change would be the builders and owners of the apartments or condominiums and not the current residents.

**babs**  
Barbara Schmelzer



Virus-free. [www.avast.com](http://www.avast.com)

**From:** [Shelley Davis](#)  
**To:** [Planning; Ushka, Catherine](#)  
**Subject:** Proposed Zoning Changes on East L St & 29th St  
**Date:** Saturday, May 11, 2019 1:14:40 PM

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As a home owner on Strawberry Hill, I am writing to encourage you NOT to rezone and build high density affordable housing in our vintage neighborhood. Why are you wanting to take the views and property values away from our homes to give views to affordable housing residents? You wouldn't do this in North Tacoma. Building large apartments in this area is a poor idea.

Our narrow streets will not support the increased traffic and parking issues. Besides, surrounded by the Tacoma Dome and new Emerald Queen Casino, there will be congestion overkill. There is no nearby grocery store and it isn't on a bus route. The increased traffic has definite safety concerns to me.

Please don't take away our neighborhood warmth.

Thank you,  
Shelley Davis  
3115 East K St

**From:** [Martin Reynoldson](#)  
**To:** [Planning](#)  
**Subject:** Proposed zoning district: E L St. & E 29th St.  
**Date:** Thursday, May 09, 2019 7:05:51 PM

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as one of home owner of this area I am shocked at the lack of concatenation of this proposal....

1 there is no roads in this area to support a project of this size... the whole neighborhood roads are small and in poor repair... your plan will make it unsafe for the kids to travel on there bikes and have neighborhood functions... by adding 4 to 5 times the amount of traffic...

2 there are few safe side walks for folks to get to the public transportation ... sidewalks incomplete non existent in places... roads are skinny to walk and drive on..

3 not enough fire protection, police protection, with this large of a structure

4 our property value drops, while our taxes go up to support this project... such as water and sewerage, and where does the extra cost for police and fire protection come from... yep our taxes...

5 this is a Historical Neighborhood since the 1900... anything built should resembled existing structures...

6 there is already zoning to protect our area... money should not be what is controlling this... and the excuses of housing and the need for this in a neighborhood without the infrastructure is a Very poor judgement

7 and the years of in-convince of the build should be more than any one neighborhood should have to endure... all the truck destroying the roads... just fixing a few as most construction firms do... and the after math of traffic combined with under sized roads and the lack of common sense to even consider this... the folks that allow discussion to take place should be investigated ...

8 one of the worst parts are the folks that live there will have this mess to deal with as well while the builder and investors take there millions and run away from all the problems the just made... and leave it in the lap of Tacoma's tax payer to Clean up...

Please Come and talk with the Folks in the neighborhood...

M Reynoldson

Sent from my iPad

**From:** [mary Harris](#)  
**To:** [Planning](#)  
**Cc:** [Harris Lance](#)  
**Subject:** proposed zoning  
**Date:** Monday, May 06, 2019 10:53:38 AM

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I am writing in strong opposition to your proposed plan for multi-family high density housing in our area, ie. Strawberry Hill/McKinley Park.

As you may be aware, this is the often neglected side of town. We have narrow streets, inadequate sidewalks, an ancient sewage system, and pot-holed streets, none of which can take on the addition of a large increase in people and vehicals. There are no local gas stations or grocery stores in this area.

You are proposing to block one whole end of our neighborhood with extremely tall buildings that will block other single residents of their views and make us all feel trapped. You are proposing to stuff hundreds of people into a relative small area which will greatly increase auto traffic in an area of limited through streets.

Strawberry Hill and McKinley Parks an historical neighborhood dating back to 1900. Tearing down homes and building large apartment complexes will forever change this residential community and conflicts with historical preservation efforts.

Build your complexes along McKinley Ave. or on the opposite side of the street from where the new Overlook complex sits.

PLEASE reconsider your proposal and at the very least downgrade the size of the proposed buildings.

Sincerely,  
Mary Harris  
East J Street, Tacoma

**From:** [John LaBonte](#)  
**To:** [Planning](#)  
**Subject:** Public comment on 2019, Comprehensive Plan / Land use re-zone  
**Date:** Friday, May 17, 2019 8:27:26 PM

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920 S. Mountain View Ave  
Tacoma, Wa 98465

To: the City of Tacoma Planning Commission

Re: Public comment on 2019, Comprehensive Plan / Land use re-zone

Commissioners,

The proposed changes to the Comprehensive Plan & Land use Regulatory Code are admirable and well intentioned insofar as addressing the lack of housing in Tacoma. Unfortunately, without first addressing the design of buildings that will eventually be built within these communities, the infill plan has generated a great deal of unnecessary anxiety within the population and works against the consistent policies of Community Health & Well being & Public Services and Facilities.

The implementation of this plan in its current organization has allowed for ramped change of nearly every neighborhood within Tacoma. As City Council Member Keith Blocker explained when addressing the outrage over CubeSmart Self-storage being built where houses once stood; "Under Washington State law, if a proposed project meets zoning and development code requirements, a permit must be issued". As there are no standards for design in place prior to the proposed re-zone the character of each neighborhood will be on the auction block.

I'm opposed to the implementation of this plan in its current form.

Thank you,  
John LaBonte

**From:** [Donna Dolge](#)  
**To:** [Atkinson, Stephen](#); [Wung, Lihuang](#); [Ibsen, Anders](#); [Boudet, Brian](#)  
**Subject:** Re: 34th and Proctor  
**Date:** Thursday, April 18, 2019 2:27:29 PM

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Mr Atkinson,

Thank you for the information you have provided and for answering my questions.

I am providing in written form, my concern regarding increased density housing in this area and the impact it will have on an area that is already struggling to handle the traffic that the current business's and residents provide.

Sincerely, Donna Dolge

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**From:** Atkinson, Stephen <satkinson@ci.tacoma.wa.us>  
**Sent:** Thursday, April 18, 2019 10:54 AM  
**To:** Wung, Lihuang; Ibsen, Anders; Boudet, Brian; jdkjldolg@hotmail.com  
**Subject:** RE: 34th and Proctor

Ms. Dolge,

Lihuang forwarded me your questions regarding the proposed rezones at 34<sup>th</sup> and Proctor. I have attached a handout that provides a brief summary of the proposed zoning change.

In response to your specific questions:

1. The proposal would rezone approximately 10-11 properties adjacent to the commercial businesses from R-2 Single Family Zoning to R-3 Two-Family Dwelling District. The R-3 allows duplex, triplex, and single family attached housing.
2. Height limits in the R-3 are 35', which is the same height limit as in the existing R-2 Zone. This height limit is modified on the eastern side of the street by a View Sensitive Overlay District that limits height to 25'.
3. There are a number of development standards intended to ensure compatibility of new development. Development regulations limit the overall intensity of development at the site (the building can only occupy 50% of the lot), off-street parking is required, new landscaping and tree canopy is required, minimum front, rear and side yard setbacks are generally the same as in the R-2 zone, height is consistent with the R-2 zoning, and yard space is required per unit. The City also utilizes building design standards, which includes window requirements, building orientation, entries, and vehicular access standards.
4. In the commercial zones, the existing zoning is C-2 General Commercial. Again, the height limit is bifurcated by the View Sensitive District so the west side of the street allows 45' and the east side is limited to 25'. However, I do want to note that we are not proposing any rezones to the commercial area at this time, though we do hope to conduct a zoning review of these areas in the next year or two.

Please let me know if you have any further questions regarding the proposals.

Best,

Stephen Atkinson  
Principal Planner

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**From:** Wung, Lihuang  
**Sent:** Monday, April 15, 2019 2:19 PM  
**To:** jdkjdolg@hotmail.com; Atkinson, Stephen <satkinson@ci.tacoma.wa.us>  
**Subject:** RE: 34th and Proctor

Ms. Dolge,

Your questions can be best answered by Steve Atkinson, project manager for this subject. I will make sure he responds on Thursday when he returns from a national planning conference. Thank you.

***Lihuang Wung***

Planning and Development Services Department  
747 Market Street, Room 345, Tacoma, WA 98402  
Phone: (253) 591-5682  
Email: [lwung@cityoftacoma.org](mailto:lwung@cityoftacoma.org)  
Web: [www.cityoftacoma.org/planning](http://www.cityoftacoma.org/planning)

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**From:** Ibsen, Anders  
**Sent:** Monday, April 15, 2019 12:07 PM  
**To:** Boudet, Brian  
**Cc:** Wung, Lihuang  
**Subject:** Fw: 34th and Proctor

Good afternoon, can you please answer this constituent's questions?

Thanks,

**Anders Ibsen**

Council Member, 1st District  
Tacoma City Council  
(253) 370-0201  
[anders.ibsen@cityoftacoma.org](mailto:anders.ibsen@cityoftacoma.org)

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**From:** Donna Dolge <[jdkjdolg@hotmail.com](mailto:jdkjdolg@hotmail.com)>  
**Sent:** Sunday, April 14, 2019 6:47 PM  
**To:** Ibsen, Anders  
**Subject:** 34th and Proctor

[https://wspdsmap.cityoftacoma.org/website/FLUM/?fbclid=IwAR2p1oau7zUxS1T7BdnyPWAmjQ0a9wGVXBjq-u\\_UrivQKjMtCIS8o4ZhyLE](https://wspdsmap.cityoftacoma.org/website/FLUM/?fbclid=IwAR2p1oau7zUxS1T7BdnyPWAmjQ0a9wGVXBjq-u_UrivQKjMtCIS8o4ZhyLE)

Anders,

I was just reviewing this rezoning map "FLUM". I reviewed comments left. I find it confusing to know whether a color is light pink or darker pink.. or ... ? **If there is going to be a structure built in the parking lot next to Terry's office Tavern then where will the folks park that go to the tavern?** Note that during the day that same parking lot holds cars from the commercial

building across the street.. I and neighbors are already avoiding going out of our area on 34th street as cars parked along Proctor make it difficult to see the traffic on Proctor in order to pull out.. there are already traffic congestion problems w/ the current density of traffic from the business's in this area...

We have watched the density increase in the Proctor shopping area and many now avoid driving through this area because of all the traffic and difficulty seeing pedestrians.. Shopping at the grocery stores in the Proctor area has to be timed so there will be parking available now.

All of this being said.. **If you could tell me specifically are we talking low density multi-family housing? How high can these buildings go? Are there any regulations to be in place so that they blend in with the neighborhood? How high can the buildings go in the Neighborhood commercial designated areas?**

**Thank you** for your time and help..

Donna Dolge

**From:** [Barnett, Elliott](#)  
**To:** [Brian Skitch](#); [Radice, Desiree](#)  
**Cc:** [Planning](#)  
**Subject:** RE: Concern about proposed land zoning changes  
**Date:** Tuesday, April 16, 2019 1:37:59 PM

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Understood!

The City's Planning Division is working on some changes to Tacoma's Future Land Use Map (FLUM). The proposed changes do not affect your property or the area next to it.

However as you noted the map shows the vegetated area behind your property as "Parks/Open Space" Land Use designation. This is because of the presence of relatively undisturbed vegetation there. The FLUM policies call for protecting/enhancing natural functions on those properties as a policy goal. However, the standards governing the use of the property come primarily from zoning (which is R-2 Single-family). Critical areas standards also apply.

#### **FLUM description:**

##### **Parks and Open Space**

This designation is intended to conserve and enhance open, natural and improved areas valuable for their environmental, recreational, green infrastructure and scenic character and the benefits they provide. The designation encompasses public and private parks and open space lands, with lands set aside for these purposes by the City of Tacoma and the Metropolitan Parks District forming the core of the designation. As more land is placed in conservation status by these agencies as well as other public and private entities, the extent of the designation will be expanded to include them.

The designation supports Tacoma's vision of an integrated parks and open space system that defines and enhances the built and natural environment, supports and nurtures plant and wildlife habitat, enhances and protects trees and the urban forest, preserves the capacity and water quality of the stormwater drainage system, offers recreational opportunities, and provides pedestrian and bicycle connections. Lands within this designation include both natural open space areas and active use parks and recreational areas. Natural open space is intended to be conserved and enhanced through habitat restoration and vegetation management to maximize its environmental and stormwater benefits, along with low-impact public access such as natural area trails and viewpoints, when appropriate. Parks and recreation lands are intended to provide opportunities for active recreation such as playfields and sports facilities, and urban amenities such as plazas, pocket parks and community gardens.

Additional, more specific policy direction regarding these types of areas is contained within the Environment and Watershed Health Element.

#### **Elliott Barnett, Senior Planner**

747 Market Street, Room 345

Tacoma, WA 98402

(253) 591-5389

[www.cityoftacoma.org/planning](http://www.cityoftacoma.org/planning)

**From:** Brian Skitch [mailto:[brianskitch@gmail.com](mailto:brianskitch@gmail.com)]

**Sent:** Tuesday, April 16, 2019 1:18 PM

**To:** Radice, Desiree <[dradice@ci.tacoma.wa.us](mailto:dradice@ci.tacoma.wa.us)>

**Cc:** Barnett, Elliott <[elliott.barnett@ci.tacoma.wa.us](mailto:elliott.barnett@ci.tacoma.wa.us)>; Planning <[planning@ci.tacoma.wa.us](mailto:planning@ci.tacoma.wa.us)>

**Subject:** Re: Concern about proposed land zoning changes

Thank you for your insight Désirée! Where I am getting this information is from the

interactive FLUM for proposed changes in the City of Tacoma where it has my land flagged as purposed for an open space/park, see here: <https://wspdsmap.cityoftacoma.org/website/PDS/OneTacoma/>. Also if I go to the City of Tacoma [mygov.org](http://mygov.org) site it's already showing it as 'Park and Open Space' for 'Land Use Intensity', which can be found here at: <https://www.govme.org/Common/MyTacoma/MyTacoma.aspx> searching with my parcel# 0320284150. I originally reached out to the planning office through phone and by email, oddly enough they both pointed me to you. The situation still remains a mystery.

Thank you,  
Brian Skitch  
253.640.1659

On Tue, Apr 16, 2019 at 11:07 AM Radice, Desiree <[dradice@ci.tacoma.wa.us](mailto:dradice@ci.tacoma.wa.us)> wrote:

Hello Mr. Skitch

I manage specifically the City's passive Open Space properties of which there are none located near your properties. And unfortunately I am not familiar with the green space initiative that you reference – so I am not much help here. I do think that a conversation with Elliott Barnett (253.591.5389) with some details about how you heard about the initiative and what specifically worries you - might help us figure out what department this information is coming out of. If there is a wetland on your property or nearby – certain activities may be limited or prohibited. Please call the permitting office at 253.591.5030.

If you are concerned about trash and homeless encampments in an area – please report them by calling 311.

Thank you,

Désirée K. Radice

o. 253.502.2126 | m. 253.820.0554

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**From:** Barnett, Elliott **On Behalf Of** Planning

**Sent:** Thursday, April 11, 2019 9:27 AM

**To:** Brian Skitch <[brianskitch@gmail.com](mailto:brianskitch@gmail.com)>; Planning <[planning@ci.tacoma.wa.us](mailto:planning@ci.tacoma.wa.us)>; Radice, Desiree <[dradice@ci.tacoma.wa.us](mailto:dradice@ci.tacoma.wa.us)>

**Subject:** RE: Concern about proposed land zoning changes

Hi Mr. Skitch,

Thanks for reaching out to us. I think I need more info to understand what green space initiative you are referring to. Is the City doing something nearby? I'm cc'ing Desiree Radice who manages the City's Open Space Program. She may know more...

**Elliott Barnett, Senior Planner**

747 Market Street, Room 345

Tacoma, WA 98402

(253) 591-5389

[www.cityoftacoma.org/planning](http://www.cityoftacoma.org/planning)

**From:** Brian Skitch [<mailto:brianskitch@gmail.com>]

**Sent:** Wednesday, April 10, 2019 4:08 PM

**To:** Planning <[planning@ci.tacoma.wa.us](mailto:planning@ci.tacoma.wa.us)>

**Subject:** Concern about proposed land zoning changes

Hi my name is Brian Skitch, I am City of Tacoma resident and homeowner at 7626 McKinley Ave. I am also a land owner of the lot immediately behind me which is parcel# 0320284150. Then immediately north of that parcel my brother Nick Skitch owns which is parcel# 0320284093.

We're trying to understand what you are proposing to change with the 'green space' initiative. Currently in my back parcel, parcel#0320284150, I have cleared out a lot of overgrowth and dangerous cottonwood trees, which I still have more to do. I've worked very hard and spent a lot of money to address these hazardous trees and create a functional space I can use. I have paid taxes on this parcel since 2013. I also have a fence going in to connect my main property to that back parcel to better establish privacy. My brother's lot (0320284093) is connected to mine so I am granting him access. He just purchased his land directly from the city or county through auction. We do not want these lots included on the green space idea that is being proposed. Currently the large corner lot, parcel# 0320284229 is a big waste land of trash and unfortunately homeless people occupying the wetland in that area. Certainly that lot can benefit from some sort of change however we do not want to have our land taken away from us for public use.

What do we need to do to make sure our lots are not lumped into this large corner lot, parcel# 0320284229 for this 'green space' proposed change?

Thank you,  
Brian Skitch  
253.640.1659

**From:** [Brian Skitch](#)  
**To:** [Wung, Lihuang](#)  
**Subject:** Re: Planning Commission Reminder and Heads-up regarding 2019 Amendment  
**Date:** Thursday, May 16, 2019 4:02:39 PM

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Hi Linhuang, I've made my comments on the public interactive map online with regards to the potential of changing my privately owned land into public land, is that adequate enough for submission?

Thanks,  
Brian

On Thu, May 16, 2019 at 10:58 PM Wung, Lihuang <[LWUNG@ci.tacoma.wa.us](mailto:LWUNG@ci.tacoma.wa.us)> wrote:

(You received this e-mail because you are on the Planning Commission's distribution list and/or you have provided comments on the 2019 Amendment.)

Please be advised that the comment period ends at 5:00 p.m., on Friday, May 17, 2019, for submitting written comments to the Planning Commission regarding the 2019 Amendment to the Comprehensive Plan and Land Use Regulatory Code. Comments can be submitted to [planning@cityoftacoma.org](mailto:planning@cityoftacoma.org).

Also, a heads-up:

The Planning Commission decided last night to conduct a special meeting on May 29, 2019, in addition to the regularly scheduled meetings occurring on June 5 and June 19, to review the large amount of public comments received on the 2019 Amendment. Adding a special meeting will also allow time for the Commission and Planning staff to kick off the annual amendment cycle for the upcoming year, i.e., the 2020 Amendment. The agenda and supplemental information for the May 29<sup>th</sup> special meeting will be distributed around May 22, 2019.

For information about the 2019 Amendment, please visit [www.cityoftacoma.org/2019Amendments](http://www.cityoftacoma.org/2019Amendments).

Regards,

***Lihuang Wung***

Planning and Development Services Department  
747 Market Street, Room 345, Tacoma, WA 98402  
Phone: (253) 591-5682  
Email: [lwung@cityoftacoma.org](mailto:lwung@cityoftacoma.org)  
Web: [www.cityoftacoma.org/planning](http://www.cityoftacoma.org/planning)

**From:** [Russ Rodgers](#)  
**To:** [Wung, Lihuang](#)  
**Cc:** [Atkinson, Stephen](#)  
**Subject:** RE: Planning Commission Reminder and Heads-up regarding 2019 Amendment  
**Date:** Friday, May 17, 2019 2:22:25 PM

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Hello Steve & Lihuang: My name is Russell Rodgers the owner of parcels located on the corner of Alaska Street and 72<sup>nd</sup> St. I have reviewed the proposed Zoning changes in the area that my property is located and do not understand why that corner shouldn't ALL be C-2 General Commercial. It is adjacent to the Tacoma Place shopping center and is on a busy street. It should absolutely have the same designation as the Tacoma Place Shopping Center. There is nothing Neighborhood about it. It is heavy traffic commercial location adjacent to a Mall. It should allow drive through and other more intense uses.

Please change the entire corner to General Commercial – C2. There is a portion of my lot that is already C-2 so why not the whole thing?

Fyi: I tried to click on the link to make a comment but could not get it to work. You need to make it easier for non- computer people to use.

Please submit my comments along with the others.

Russ Rodgers  
214-609-4413

Owner of:  
7018 Alaska St  
1713 S 72<sup>nd</sup> St Tacoma WA 98408

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**From:** Wung, Lihuang <LWUNG@ci.tacoma.wa.us>  
**Sent:** Thursday, May 16, 2019 3:58 PM  
**To:** Wung, Lihuang <LWUNG@ci.tacoma.wa.us>  
**Subject:** Planning Commission Reminder and Heads-up regarding 2019 Amendment

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Regards,

***Lihuang Wung***

Planning and Development Services Department  
747 Market Street, Room 345, Tacoma, WA 98402

Phone: (253) 591-5682

Email: [lwung@cityoftacoma.org](mailto:lwung@cityoftacoma.org)

Web: [www.cityoftacoma.org/planning](http://www.cityoftacoma.org/planning)

**From:** [Henry, Thomas A CIV USN NAVSHIPYDIMF PGS WA \(USA\)](#)  
**To:** [Planning](#)  
**Cc:** [Ushka, Catherine](#)  
**Subject:** Response to 2019 Comprehensive Plan and Land Use Regulation Amendments  
**Date:** Wednesday, May 08, 2019 1:15:36 PM

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May 8, 2019

Planning Commission  
747 Market Street, Rm 349  
Tacoma, WA 98402

RE: 2019 Comprehensive Plan and Land Use Regulation Amendments

Dear Planning Commission,

I'm writing to express my views regarding the rezoning proposal of East L. St and East 29th St. I'm strongly in opposition of the rezoning proposal for East L Street and East. 29th Street which would change the zoning from R-4L, a multiple family low density district to R-4, multiple family high density district.

According to your website, this area is proposed to be rezoned because:

1. The current Comprehensive Plan designation of Multi-family (high density).
2. Proximately to lower Portland Crossroads Center and McKinley Park.
3. This area has view potential.

I have a number of issues with this proposal. Specifically,

a. Misalignment of the current Comprehensive Plan with zoning areas is an inadequate reason to pursue monumental change that will forever change Strawberry Hill, and negatively impact current homeowners of this neighborhood.

b. According to most recent consensus, densification efforts are disproportionately happening in the three lower income districts. In fact, 50 percent of rezoning proposals are in the lower three socioeconomic districts.

c. The neighborhood surrounding 29th street is a beloved neighborhood that has been around since 1901 when McKinley Park was developed. Its historical in nature with historical architectural homes. If you pursue this rezoning you will negatively impact this neighborhood for current and future residents. This neighborhood should be preserved as a historical area.

d. The neighborhood of East L St and East 29th ST does not meet most of the listed criteria for area selection to rezone. The zoning selection criteria are: "transit access, designated pedestrian streets or within ¼ walkshed of a mixed-use center". Access roads are narrow and are not maintained. There is on-street parking which allows one car at a time. This is not a walkable area. According to Redfin, the walkable score is 41 out of 100 which receives the category of "car dependent" on their website. This neighborhood has crumbling sidewalks if they have sidewalks at all. Although we are close to I-5 freeway entrance, public transportation is not walkable.

e. The implementation of the rezoning plan would reduce affordable housing for homeowners not just by building large complexes in their neighborhoods but by eliminating views. This will certainly reduce property values. How do you compensate current homeowners who have been investing in this area for decades?

f. Affordable housing can be achieved besides increasing rentals. A fundamental way to achieve wealth is through investing in real estate where expenses are fixed and you build equity. Affordable housing can be accomplished through homeownership not just by increasing rentals.

g. There are regulations for height restrictions for new development in affluent communities in Pierce County such as North Tacoma and North East Tacoma. The View Sensitive District Overlay Zone is set in North Tacoma to protect homeowner properties, views and home value by limiting development of 25 feet and prevent issues like rezoning. However, East and South Tacoma do not have the View Sensitive District Overlay. This regulation is not consistently applied across Pierce County. I ask that you create internal consistency with the VSD.

h. There is concern that the neighborhood of East L St is not aware of the proposed rezoning. It seems unethical to proceed with such a large change without the knowledge and support of the community to which it will directly impact. This is a site-specific proposal and therefore efforts should be made to adequately inform homeowners in this community of the proposal.

I ask that you strongly reconsider the proposal to rezone the neighborhood of East L. St and East 29th St. It is a ludicrously disordered approach to rezone in efforts to make an aged “comprehensive plan consistent”. I ask that you have equal protection for homeowners in Pierce County by consistently applying the View Sensitive Overlay and that equal efforts are made to preserve historical areas throughout Tacoma. I ask that you pursue other means to meet housing demands in Pierce County for example by allowing homeowners to have detached rentals, by pursuing densification efforts in other districts.

Sincerely,

Karen Henry

**From:** [Henry, Thomas A CIV USN NAVSHIPYDIMF PGS WA \(USA\)](mailto:Henry.Thomas.A.CIV.USN.NAVSHIPYDIMF.PGS.WA@USA)  
**To:** [Planning](#)  
**Cc:** [Ushka, Catherine](#)  
**Subject:** Response to 2019 Comprehensive Plan and Land Use Regulation Amendments  
**Date:** Wednesday, May 08, 2019 1:15:54 PM

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May 8, 2019

Planning Commission  
747 Market Street, Rm 349  
Tacoma, WA 98402

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f. Affordable housing can be achieved besides increasing rentals. A fundamental way to achieve wealth is through investing in real estate where expenses are fixed and you build equity. Affordable housing can be accomplished through homeownership not just by increasing rentals.

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Sincerely,

Sherry Horner

**From:** [Karen Kelly](#)  
**To:** [Planning](#)  
**Subject:** Rezone comments  
**Date:** Friday, May 17, 2019 11:17:51 AM

---

Dear planning Commission,

I attended the May 1st meeting, but did not comment.

I do support infill and increased housing availability. What concerns me is lack of design build requirements. The established neighborhoods, which are the subject of the rezone, each have their style of build and personality. As Kieth Blocker wrote in his neighborhood newsletter, allowing developers to build any style structure in a established neighborhood is contrary to the City's comprehensive plan and lacks support of its tax paying citizens. Although the City does have limited design review, it is not sufficient to protect the established neighborhoods, which can become the victims of disreputable builders, who are unconcerned about the negative effects on the community.

Four plex apartments or condos can be constructed in established neighborhoods as has been demonstrated on the "wedge" are of the City, from No 15th to Division Ave.

Please also consider the impact on the infrastructure, schools and parking when allowing such builds.

I encourage the planning the commission to work diligently on more strict design build requirements in order to preserve and protect our many unique neighborhoods, which make Tacoma the special place it is.

Thank you,  
Karen Kelly

**From:** [Kathleen Fonarow](#)  
**To:** [Planning](#)  
**Subject:** Rezone FLUM map  
**Date:** Sunday, April 28, 2019 9:50:02 AM

---

I'll make it brief; do not rezone the north end. Use vacant land or dilapidated homes elsewhere. The charm and history of the North end is of a bygone era never to be found again which creates its value. If you destroy homes and put up more apartment buildings it's not going to be pretty. Just look at Seattle for example and it's dull modular architecture. There are enough parked cars on the street already and firetrucks can't get thru as it is. Don't add more multi family housing here, there are areas where the homes are in terrible condition that could easily be purchased, bulldozed and built upon.

Thank you for reading.

**From:** James Chambers  
**To:** [Planning](#)  
**Subject:** Rezone of property located at 6640 S Alaska St, Tacoma, WA  
**Date:** Thursday, May 16, 2019 9:10:34 AM

---

James R Chambers

7231 SE Snowy Way

Port Orchard WA 98367

May 16, 2019

To: City of Tacoma Planning Commission

Re: Property located at 6640 S Alaska St, Tacoma, WA, held in Donkey Island trust, LLC

To Whom It May Concern:

I, James Chambers, am the eldest living of the Chambers family. As my sister Mary has noted, the Chambers' first moved to this property approximately 68 years ago. I recall that when we first moved here, Alaska street was a gravel road and unlike today there was no freeway, no shopping center, no bus service, no sidewalks. Everything has changed

At 3.6 acres, the property is now surrounded on all sides by properties and lands that are not single family residential. Adjoining to the West is I5; to the East is Wapato Lake Park; to the South is a shopping center; to the North is now some type of convalescent home. There are no nearby residential neighbors.

The property is in a prime location for development. To be consistent with the land use of all the adjoining properties, it begs for re-purposing and rezoning.

We ask that this rezone be done this year and that you consider the value this will add to the area if the property is put to better use in a proper rezone. Commercial or R4L would put the land to best use for the city of Tacoma.

Respectfully,

James R, Chambers

7231 SE Snowy Way

Port Orchard WA

253-853-6750

Chambers1002@gmail.com

**From:** savols@juno.com  
**To:** [Planning](#)  
**Subject:** Rezone  
**Date:** Friday, May 17, 2019 5:07:53 PM

---

Dear Tacoma Planning Board,

We oppose the proposed zoning change for the area in the Stadium District approximately bounded by the corners of zzz and zzz, from its present R2 to R4. Our house is zoned R2 and is not directly included in the change. However, the house across the street, and the adjacent several blocks, are included.

We oppose this change for a variety of reasons as outlined below -

#### Historic

The Stadium is a very historic district, as even its namesake name implies. Our own house has a Historic Register Tag and has been on the Tacoma Historic Homes Tour in previous years. This nearly century old home, and the other older single family homes should not be abutting ultra-modern 60 ft high apartment buildings.

#### Practical

Except for Tacoma Ave, the streets within the proposed rezone area have very low traffic. Ours is a corner house and our intersection has neither a traffic light nor any stop signs. Yet, in the nearly 7 years we have been here, we have not seen any accidents nor even close calls. A series of 60 ft high apartments plopped down in the middle of this neighborhood will dramatically change its quiet, easy parking character, and not for the better

#### Urban Planning

I do not have a degree in urban planning but common sense discourages the abutment of widely varying districts without a buffer zone to blend them together. A simple street should not be the separator between R2 and R4 zones.

#### Aesthetics

When I look across the street from our front door now I see a green hedge, a nice old home, and a spectacular Sequoia tree. Juxtapose that to a view of a 60 ft. apartment wall to understand our opposition. This is a private objection affecting my wife and me, but those other objections, as shown, are for broad reasons.

Please reject this particular rezone. Rather, please support utilization of the large vacant lots within existing high density/commercial zones to increase city population before irreversibly changing the character of historic, quiet, neighborhoods

Respectfully submitted,

Martin and Toni Savol

705 N 5th St, Tacoma WA 98403 253 572 1157 savols@juno.com

**From:** [Cleveland Thomsen](#)  
**To:** [Planning](#)  
**Subject:** Rezoning in East Tacoma  
**Date:** Friday, May 17, 2019 10:05:15 AM

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I am writing to oppose re-zoning East Tacoma's view neighborhood. I know the lower income areas of town have to carry every burden, but can you guys throw us a bone just this once? Schools over here close first, roads are falling apart, construction projects are all staged on our main streets. There is tons of property over here for higher density projects that don't obstruct, but you gotta block the few good views that aren't on the north side.

Would the city of Tacoma even consider this rezoning on the slope of N 30th? Of course not. But, having lived here for over 20 years, paying property taxes for most of that, I know my history and I can predict the future. You guys will clearly pass this new zoning, because neglecting and abusing the lower income neighborhoods is the most Tacoma thing to do.

Cleveland Thomsen

**From:** [THOMAS CLINE](#)  
**To:** [Planning](#)  
**Subject:** Rezoning in the 2019 Amendment to the Comprehensive Plan  
**Date:** Friday, May 17, 2019 1:37:23 PM

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Dear Planning Commission

Please do not push forward on the Proposed 2019 Amendments to the Comprehensive Plan that address housing affordability by seeking a rezone of existing neighborhoods. It is time to take a step back and look at how these proposed Amendments will impact our neighborhoods in a negative vs a positive way.

- Proposed rezone to R-4L in the Narrows neighborhood will result in 4-plex construction, and this is already an affordable neighborhood of single family homes
- Design Review needs to precede any rezone to insure that we have a Plan in place and not create a mess of problems to be fixed such as parking, etc
- Ensure that we have the transit access first before making any rezone

We support the planned redevelopment of the James Center North property that will have amazing transit access. As we drive around the area there is potential for similar redevelopment (e.g. K-Mart site, 6th ave) that makes sense for affordability and access.

We appreciate your attention.

Respectfully,

Tom & Gail Cline

Tacoma Residents

7535 S. Hegra Rd

Tacoma, WA 98465

[clinetg@comcast.net](mailto:clinetg@comcast.net)



**From:** [Louis & Barb](#)  
**To:** [Planning](#)  
**Subject:** Rezoning in the Stadium District  
**Date:** Friday, April 26, 2019 5:37:08 PM

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I have recently learned about the planned rezoning in the Stadium neighborhood; this is not the type of development appropriate to this area. To destroy historic homes and neighborhood character to build ugly, expensive apartments or condos is to destroy the reason people are attracted to the area! Not to mention the effects on the long-time residents and property owners. There are many areas of Tacoma crying out for development and affordable housing, without the downside of altering the character and charm of this historic neighborhood. I am strongly opposed to this plan!

Regards,  
Barbara DuBois  
5020 N. 18th St.  
253-759-2698

**From:** [Jeff Orr](#)  
**To:** [Planning](#)  
**Subject:** Re-zoning Neighborhoods in North Tacoma  
**Date:** Thursday, May 16, 2019 12:58:09 PM

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To whom it may concern:

I have become aware through other concerned neighbors of your proposal to re-zone portions of North Tacoma neighborhoods, including the area around North 26th and Alder.

My grandfather, who sold candy for Brown and Haley statewide and owned small businesses in downtown Tacoma during the 1950's often remarked that Tacoma City Government ranked as one of the most corrupt in Western Washington.

I suspect that my grandfather's bitterness may have stemmed from B & O taxes related to his business. However, as parts of the Stadium and Proctor Districts are experiencing far greater congestion due to multi story condominiums and apartments that create limited parking for residents, visitors and existing longtime business owners, I'm starting to believe my grandfather's resentments ring true.

As a customer of Ball Auto Service in the Stadium District, I sympathize with the plight of this family owned business that now has no parking for its customers to drop off vehicles. It appears that our Planning Commission seems to favor the deep pockets of developers and the temptation of far greater tax revenue that results from multi-story buildings with fancy boutiques over small business such as Ball and Ranko's that have served the community faithfully for over a half century.

I'm sad for the residents of homes adjacent to the new multi-story complexes adjacent to Metropolitan Market and Mason Middle School in the Proctor area. I suspect many of those residents miss the sunshine that was afforded their homes in the morning prior to the development around their properties. They've had to remove sunshine needy plants and re-landscape using plants that are shade tolerant. Perhaps they've lost a sense of repose and quiet they enjoyed and valued in choosing their homes in the first place. Incidentally, I seem to find it no coincidence that one of the development partners in these Proctor area projects served on the Tacoma City Council prior to his expansion plans. I often wonder who he was truly representing as a City Council member: the interests of his residents or his ambitions and increased revenue as a commercial landowner.

Finally, I grieve for residents located around Cook's Tavern at the corner of North 26th and Alder. I am struck by how frustrating it must be to never have available parking in front of your single family home. I suspect that the neighbors around Cook's had no idea what type of parking challenges and damage to their parking strips would occur during the "development" phase of Cook's. I would guess they deeply regret not knowing the full extent of how their daily lives would be disrupted.

If the City of Tacoma Planning Commission continues to allow re-zoning and development based on the fallacy that parking accommodations are not needed for additional business and tenants, and appears to "Green Light" development projects located in historic, pristine and charming neighborhoods to fatten the coffers of developers and City Government alike, then I suspect my grandfather's above remarks still ring true today.

Sincerely,

Jeff Orr

3314 N. 29th  
Tacoma, WA 98406  
253.363.2683

**From:** Stevie- TV  
**To:** [Planning](#)  
**Cc:** [Ushka, Catherine](#)  
**Subject:** Rezoning of L and E street  
**Date:** Monday, May 13, 2019 8:27:11 AM

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As a new homeowner i worry this will bring more traffic and crime to my small neighborhood. Our streets are not maintained and more traffic will only make it worse.  
We also live in a historic neighborhood and id hate to see it lose its charm and value as well as its historic look with views of the sound. Please look elsewhere for rezoning. id like to keep our neighborhood clean and quiet.

Steve  
Tadla

**From:** [lance Harris](#)  
**To:** [Planning](#)  
**Cc:** [Mary Harris](#); [Ushka, Catherine](#)  
**Subject:** Rezoning proposal  
**Date:** Monday, May 06, 2019 1:19:15 PM

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Dear Sir or Ms.: I wish to express my fervent opposition to the proposed rezoning of the McKinley Hill/Strawberry Hill (E L & E 29<sup>th</sup> St) district. To allow the heavily funded and invested property developers to erect multi-story, high density dwellings as allowed by the proposal will destroy the character and functionality of the entire neighborhood.

The area lacks adequate street capacity with most of the streets potholed and already uncared for which will only greatly worsen if the population is vastly increased as would occur in this proposal.

The neighborhood is a well established and reasonably stable one with features that date to 1900. Services are largely absent with no local grocery outlet and a fire station that will be completely overwhelmed by the influx of new service demands. Sidewalks are largely absent and much of the area is very hilly and not amenable to walking to public transit.

To insist that this move will increase affordable housing is laughable. An apartment with a broad view of the city (the developers' real reason for their attempts at rezoning) will hardly rent for "affordable" fees unless the comparison is meant to be made not to other Tacoma properties, but instead to Seattle and surrounds.

This entire project smacks of city/big money favoritism. The big money wants the view lots and our city representative, Catherine Ushka, has been startlingly absent from any public considerations of this proposed change. While it would seem only reasonable that her office ensure the affected residents would be clearly notified of this important consideration, we have in fact received only one, relatively uninformative postcard regarding this issue, and I am aware of this proposal only through the outreach efforts of a neighbor who will be severely impacted if it is approved.

I am angry at the city officials, most especially our alleged representative, and I can only hope that the local residents---now that they are being alerted to this move by other concerned neighbors, will act to curtail further consideration of this attempt to co-opt our neighborhood.

There are plenty of areas on McKinley Hill that could use the development but would lack the view or would that cost more to develop. If anyone—Ms. Uska included--actually cares about the neighborhood and are not entranced by the big money, they will act to quell this move.

Sincerely,  
Lance Harris, Ph.D.

Sent from [Mail](#) for Windows 10

**From:** [Timothy Chambers](#)  
**To:** [Planning](#)  
**Subject:** REZONING WAPATO LAKE  
**Date:** Monday, April 29, 2019 6:09:54 PM

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To Whom it May Concern,

I would like to express my concern that the rezoning for the Wapato Lake residential district has not been zoned to high density residential as of yet. There is a real benefit to the city and the area to do so. I feel that this protracted decision is not only counter productive but to my thinking incomprehensible.

Could you please enlighten my as to why the rezoning action has not already occurred.

Thank you for your consideration

Timothy P Chambers

**From:** [Michael Oleary](#)  
**To:** [Planning](#)  
**Subject:** Rezoning  
**Date:** Monday, March 11, 2019 9:45:33 PM

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Please remove the Narrows neighborhoods rezoning from your plan . Thank you Michael

Sent from my iPhone

**From:** [J.T](#)  
**To:** [Planning](#)  
**Subject:** Rezoning  
**Date:** Tuesday, May 14, 2019 11:26:55 AM

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Dear Tacoma Planning,

Greetings! My name is Jowy Tran and I'm the owner of the house at 6247 28th St NE Tacoma Wa 98422. I'm aware that you are currently discussing the rezoning of properties in my neighborhood, including my house. I would like to strongly support the rezoning of my property into mixed-use/commercial zoning. I believe that it is the best use of my land as my neighbors land north of me, across the county border in Federal way, are all commercially zoned. Plus, due to the recent installation of the apartments at the corner of Norpoint way NE and 29th St NE, the commercial zones allotted to NE Tacoma have been removed. The influx of residents due to the apartment complexes currently being built will add to the need for more Commercial zoning in the area. My property would be the perfect spot to be rezoned into commercial land as it is also conveniently located nearby and within one block between two bus stops. One stop in Tacoma at 29th St NE and the other in Federal way on the same road at SW 356th St. My neighbor immediately to my West is of the same opinion and would also like her house rezoned to mix used / commercial. Please, I hope you consider the rezoning of our homes as it will benefit the neighborhood as a whole. Thank you.

Very Respectfully,  
Jowy Tran

**From:** [Leah](#)  
**To:** [Planning](#)  
**Subject:** Rezoning  
**Date:** Monday, March 11, 2019 7:16:07 PM

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Please do not rezone the Narrows area of Tacoma. We value our neighborhood and do not want the rezoning to occur.

Thank you,

Leah

**From:** [Geoff Smith](#)  
**To:** [Planning](#)  
**Subject:** South End Overlooks  
**Date:** Wednesday, May 15, 2019 10:55:03 PM

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I feel that the proposed rezone of areas on or near East Wright Ave in the East Side of Tacoma is a misguided proposal.

This is not driven by the community! There is NO ONE in the neighborhood that I have found that is for this zoning change! Change should be desired and wanted by the community, not FORCED upon them AGAINST their will.

It is counter to your R-4 guidelines. It is not along a major transportation corridor or near a high density area. It is a small residential, mostly single family 1& 2 story house neighborhood and CAN NOT handle additional traffic and noise, and the decrease in property value. It is totally out of character for our neighborhood.

Views from East Wright Ave need to be preserved, not turned into views of a large apartment building.

It is extremely random. Some blocks are half in, half out of the proposed area. Some blocks have one side of the street and not the other.

Increased density is needed in the right places. There are appropriate places for increased density, East Wright Ave IS NOT one of them. The steep hillside on East 29th IS NOT one of them. South end overlooks rezoning is a bad idea.

Geoff Smith

**From:** [connie pyles](#)  
**To:** [Planning](#)  
**Subject:** South end overlooks  
**Date:** Wednesday, May 15, 2019 10:38:30 PM

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I feel that the proposed rezone of areas on or near East Wright Ave in the East Side of Tacoma is a misguided proposal.

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It is counter to your R-4 guidelines. It is not along a major transportation corridor or near a high density area. It is a small residential, mostly single family 1& 2 story house neighborhood and CAN NOT handle additional traffic and noise, and the decrease in property value. It is totally out of character for our neighborhood.

Views from East Wright Ave need to be preserved, not turned into views of a large apartment building.

It is extremely random. Some blocks are half in, half out of the proposed area. Some blocks have one side of the street and not the other.

Increased density is needed in the right places. There are appropriate places for increased density, East Wright Ave IS NOT one of them. The steep hillside on East 29th IS NOT one of them. South end overlooks rezoning is a bad idea.

Connie Pyles  
619 E. Wright Ave  
Tacoma

**From:** [Brent R](#)  
**To:** [Wung, Lihuang](#)  
**Subject:** Strawberry hill rezoning  
**Date:** Friday, May 17, 2019 6:37:12 PM

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Hi this is Brent And Kim Rogers who are opposed to the rezoning of strawberry hill. Can you add my email address o keep me notified of any changes or important dates.

Thank you  
Brent and Kim Rogers

Sent from my iPhone

**From:** [Rane Shaub](#)  
**To:** [Planning](#)  
**Subject:** Support for Area Wide Rezones - District 4  
**Date:** Thursday, March 07, 2019 6:34:22 AM

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Hello,

I am writing in support of the proposed Area Wide Rezones, specifically the South End Overlooks in District 4. Given the proximity of these locations to the Tacoma Dome transit center, upzoning them to allow for more density aligns with the goals of the One Tacoma Comprehensive Plan and will allow for more affordable housing options around transit. I urge the city to please move forward with these rezones.

One suggestion to go along with the rezones would be to consider additional bus routes through the area to accommodate the potential new housing. Currently, the bus routes are limited from the McKinley area down to the Tacoma Dome transit center. Providing additional bus stops/routes along E McKinley Way just south of I-5 or along E 34<sup>th</sup> St would be extremely beneficial to future residents for increasing their access to this major transit hub.

Thank you for your consideration,

Rane Shaub  
[rane@shaubellison.com](mailto:rane@shaubellison.com)  
c: (253)691-5152  
o: (253)272-4119  
f: (253)272-5275

**From:** [Rebecca Splinter](#)  
**To:** [Planning](#)  
**Subject:** Who owns the Tacoma City Council??!!  
**Date:** Friday, April 26, 2019 8:57:57 AM

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More density in the North End will not result in more affordability. No developer or owner is going to invest in property at those prices, and go into the red for years, to put in affordable housing. Developers want density in the North End BECAUSE they can sell or rent at high prices.

Sadly, the council members must FULLY understand that--so affordable housing for Tacoma is NOT their actual goal. For some unknown reason, council members are pushing to rezone. What is the actual reason? Usually it's money. I don't know how that works in this situation. I just know that public interest is NOT the reason. If the media has any actual investigative journalists left, it would be interesting to find out why each council member is supporting this rezoning. It's hard to believe a lack of reasoning ability accounts for all of the council members' support.

**From:** [g.davis](#)  
**To:** [Planning; Atkinson, Stephen; Ushka, Catherine](#)  
**Subject:** zoning change E L St and E 29th St  
**Date:** Thursday, May 16, 2019 4:49:58 PM

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I am using my neighbor's email to write to you with my objections to the proposed amendment to land use codes in the 29th and L Streets area that would change from multi family low density to multi family high density.

L St is a hill, the streets are small for very little safe parking there are no sidewalks. Putting a 65' tall apartment complex up would badly overload the area and block all up hill neighbor's existing view.

Keep the existing zoning of multi family low density or at least use the view sensitive overlay here just like the residents of north Tacoma enjoy to protect their water views.

Come look at the hill to see the situation as it is before someone sues your for losing their water views.

Tim Pinchak  
1205 E 30th St  
Tacoma, WA 98404

**From:** J. Baxter  
**To:** [Planning](#)  
**Subject:** Zoning changes threaten Tacoma neighborhoods  
**Date:** Friday, May 17, 2019 5:01:15 PM

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Zoning mistakes of the past, or lack of enforcement by the City, has already resulted in construction of apartment buildings or ugly concrete high-rise condominiums in the Stadium District where they do not belong. Examples are on the corner of N 5th and D St, and N 4th and D St. Also the condo buildings directly across from the Stadium Bowl.

Tacoma's apparent priority of stuffing as many people as possible into certain areas of the city threatens long established neighborhoods of single family homes.

The City should be trying to attract development in areas where it's needed, not over-crowding already thriving areas.

Thank you.

J. Baxter

**From:** [Rebecca Splinter](#)  
**To:** [Planning](#)  
**Cc:** [Matsch Otto and Jane; Jim & MJ Lockemy](#)  
**Subject:** Zoning Tacomas North End  
**Date:** Friday, May 17, 2019 11:48:04 AM

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Providing zoning that permits increased density in the North End will NOT increase affordable housing in North End. The property is all privately owned and nice one that has paid North End prices for property will build housing that will have low rents. Meanwhile, Hilltop has better proximity to downtown, better public transportation, and property prices that are what? Half or a third of the prices in the North End? Hilltop also has many tracts of land that are empty. Like the North End, Hilltop has historical buildings and charming owner-built homes.

Developers want zoning that permits them to build more density in the North End because they want the high sale prices they'll be able to get or the high rents. But IF the city's focus is affordable housing, why is the city supporting developers over residents? Almost no one in the North End wants greater density--the city needs to care about those residents, too. Why is the council NOT supporting residential development and investment in Hilltop? Why ANY council members support zoning that changes density in the North End is quite a mystery. Are there any actual journalists in town that can figure this out?

I do not support zoning that permits greater density in the North End until the density in the historical Hilltop matches existing density in the North End.

**From:** [Bronnie Miller](#)  
**To:** [Planning](#)  
**Subject:** zoning  
**Date:** Friday, May 17, 2019 4:40:05 PM

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I am sending this email to ask that you maintain the current zoning related to building height on Strawberry Hill. We have lived at 1015 E.30th St. since 1992 and have enjoyed everyday. This is an old neighborhood with many historic homes. It is an area that should be protected and maintained as an area of quiet old homes. We cannot preserve the character of this area with 6 story apartment buildings built on the hillside. We have seen our property values consistently rise in the years we have lived here. With these large buildings destroying our view this would not be the case. Please allow us to continue living here as it is now; once it is changed it will be forever destroyed.

Bronnie Miller



**To:** Planning Commission  
**From:** Elliott Barnett, Planning Services Division  
**Subject:** **Shoreline Master Program (SMP) Periodic Review**  
**Meeting Date:** May 29, 2019  
**Memo Date:** May 23, 2019

**Action Requested:**

Review public comments and provide staff direction on any modifications.

**Discussion:**

On May 29, 2019 staff will summarize public comments and staff input received on the proposed Tacoma Shoreline Master Program (SMP) Periodic Review and Updates. Staff have prepared an Issues and Recommendations summary table, which identifies potential modifications the Commission could consider in response to the comments. Staff will request guidance on those and any other remaining issues, pursuant to preparing a final version of the SMP updates for recommendation to the City Council at the June 19, 2019 meeting.

**Summary:**

The Shoreline Management Act (SMA) requires a periodic review of Shoreline Master Programs (SMPs). Local governments must review amendments to the SMA and Ecology rules that have occurred since the master program was last amended, and determine if local amendments are needed to maintain compliance. Local governments must also review changes to the comprehensive plan and development regulations to determine if the SMP policies and regulations remain consistent with them. Local governments should consider during their periodic review whether to incorporate any amendments needed to reflect changed circumstances, new information or improved data.

**Prior Actions:**

June 6, 2018—Commission public hearing on the 2019 Amendments.  
June 20, 2018—Commission accepted application, concluded scoping, initiated analysis.  
December 5, 2018—the Commission provided preliminary direction on the scope of work.  
February 20, 2019—the Commission provided direction on the majority of the proposals.  
March 20, 2019—Commission authorized the release of the proposals for comment.  
May 15, 2019—Joint Public Hearing (Planning Commission & Department of Ecology)

**Staff Contact:**

Elliott Barnett, Senior Planner, [elliott.barnett@cityoftacoma.org](mailto:elliott.barnett@cityoftacoma.org), or (253) 591-5389.

**Attachments:**

1. Issues and Recommendations summary table
2. Exhibit A – Oral testimony
3. Exhibit B – Written testimony and staff input

c: Peter Huffman, Director





## Public Comments and Staff Responses and Suggestions

2019 Amendments to the Comprehensive Plan and Land Use Regulatory Code

Key	Comment	Commenters	Staff Response
<b>Application: Tacoma Shoreline Master Program Periodic Review</b>			
<p><b>PROPOSAL:</b>            Fulfill the City’s obligation under state law to complete a periodic SMP review including the following actions:</p> <ul style="list-style-type: none"> <li>• Updates to reflect DOE’s Periodic Review Checklist</li> <li>• Update Geologically Hazardous Area standards</li> <li>• Integrate the City’s Biodiversity Areas/Corridors standards in shorelines</li> <li>• Updates to address sea level rise and changes to Base Flood Elevation</li> <li>• Updates for minor residential additions in the Salmon Beach community</li> <li>• General edits to clarify the intent and improve consistency</li> </ul>			
<b>TOPIC: Salmon Beach</b>			
	<p>Provided technical input regarding the proposal to allow Salmon Beach cabins to be expanded under certain circumstances.</p> <p>FEMA does not support moving structures waterward.</p> <p>FEMA states that new and substantially rebuilt structures cannot be built overwater and must be sited landward of the mean high tide line.</p>	<p>FEMA (Cooper; Fricke-Croft)</p>	<p>Staff are consulting further with FEMA to clarify this matter.</p> <p>From a regulatory perspective, the question largely hinges on what additions/alterations are legally permitted before being considered substantial. Proposed reconstruction of structures where costs are over 50% of the structure’s market value are considered substantial.</p> <p>The current proposal (to allow second story additions to existing nonconforming overwater homes under limited circumstances) is based on a PDS staff interpretation of pertinent building/ floodplain regulations that differs from the comments from FEMA, as follows. It is staff’s interpretation that the most recent update to ASCE 24 (a referenced standard in the 2015 International Building and Residential Codes) allows substantial improvements to existing structures in V Zones without moving landward of the mean high water mark.</p>

Key	Comment	Commenters	Staff Response
			It is important to clarify this with FEMA, not only for their subject matter expertise, but also because FEMA requires Tacoma to meet floodplain standards citywide in order to ensure our ongoing eligibility for the National Flood Insurance Program.
	Provided subject matter expertise regarding Salmon Beach second story additions as proposed. Comments note that DFW would need to review each project on its own to determine impacts to fish life or habitat and any mitigation required.	Bockstiegel (WA Dept. of Fish and Wildlife)	Staff concur. Environmental review would be required for second-story additions under the proposal.
	Regarding the proposal to allow second-story additions to nonconforming overwater structures: <ol style="list-style-type: none"> <li>1. Add flexibility to the proposal by removing the requirement to meet BFE. The existing Building Code requirement to do so with substantial development is adequate.</li> <li>2. Clarify that the standards of section 2.5.B would only apply to the height increase, not to other development.</li> <li>3. Add language specifying that Section 2.5.B applies to Salmon Beach and restates the intent to continue the area. The historic designation strengthens the case.</li> </ol>	Salmon Beach Improvement Club/Salmon Beach North (written and oral comments)	<p>1. Staff do not recommend changes to the proposal regarding the BFE requirement.</p> <p>Staff note that the “50% of value” trigger for a Substantial Improvement is cumulative since 1987. If remodeling work has been done previously, it could result in a 10% (size) addition exceeding the 50% valuation threshold, and thus being a Substantial Improvement required to be raised to the new BFE.</p> <p>Staff also note that the actual requirement is to raise the bottom of the pile cap beams to Design Flood Elevation (DFE) which is BFE + 1 foot.</p> <p>2. Staff note that the standards of Section 2.5.B apply to height increases only.</p> <p>3. Staff note that Section 2.5.B applies generally to nonconforming overwater dwellings, not only to Salmon Beach.</p> <p>In the case of Salmon Beach, there are multiple overlapping policy and regulatory considerations. Under the Shoreline Management Act (SMA), the Salmon Beach overwater homes are considered nonconforming. The Growth Management Act (GMA) strongly</p>

Key	Comment	Commenters	Staff Response
			<p>emphasizes protecting the environment and ensuring public safety. The Building Code and floodplain regulations do so as well. This area is considered critical habitat under WAC 173-26-221(2)©(iii) and identified as habitat of special concern under WAC 220-660-30 due to the presence of shallow intertidal habitats with vascular plants and feeder bluffs. These overlapping policy goals and regulatory requirements make it challenging to accommodate the desired flexibilities.</p> <p>A combination of regulatory and practical considerations further limit options. Staff note that it is not likely to be economically feasible to move out due to pile construction requirements to deal with lateral loads from wave forces. This would require much stouter foundation design and construction than has been used for the existing homes. On the other hand, regulations would typically require new construction to be built out of the water which is not feasible here. Furthermore, conditions vary because the slope is not uniform everywhere.</p> <p>Given the constraints, there are finite limits of what can be done. Should the Planning Commission wish to consider alternatives, the following is a range of options:</p> <ol style="list-style-type: none"> <li>1. No change to existing code (which allows a one-time 10% expansion).</li> <li>2. Public review draft proposal: Allow a second story with the requirement to avoid impacts to the environment, meet BFE elevation, and reduce risk from geological hazards.</li> <li>3. Consider a hybrid alternative that would allow the existing 10% one-time expansion to be a second-story addition, potentially without the requirement to meet BFE.</li> </ol>

Key	Comment	Commenters	Staff Response
	<p>The City should strike the requirement to do geological hazard review because it is known that the structures are at the bottom of a slope that is prone to sliding.</p> <p>The 1990 hold harmless agreement between the City and some members of the Salmon Beach community should be construed to waive City review of geological hazards related to the steep slope.</p>	Salmon Beach Improvement Club (Peterson)	<p>Staff do not support a proposal that would result in development and increased occupancy in a location that is geologically hazardous. The steep slope is only one of multiple, overlapping critical areas and buffers. Staff note that any proposed development citywide located on or near geologically hazardous areas is required to conduct a geological review. Furthermore, the City is only one of the agencies with purview over development in this location.</p> <p>Staff are consulting with the City Attorney’s office regarding the 1990 agreement.</p>
	Staff provided responses to questions from the Salmon Beach community regarding the proposals.	Salmon Beach Q & A (PDS staff)	This information is included for reference.
<b>TOPIC: Geological Hazards</b>			
	<p>Comments provide public agency and subject matter expertise regarding the proposed geological hazards code updates.</p> <p>Several comments relate to whether the proposed review threshold of 15% slope is too stringent.</p>	Stone; Givens	<p>Staff and the consultant team are reviewing these technical comments and <b>will identify recommended changes.</b></p> <p>Staff concur that the consultant team should review DNR and GeoEngineers technical comments and update the gap matrix and geotechnical memo to document that the BAS was considered. For example, the consultant team relied upon the latest landslide hazard inventory by DNR for Pierce County but did not clearly indicate this source was part of the BAS considered.</p> <p>Of note, the requirement to designate slopes steeper than 15% is based on a state WAC 365-190-120. The City is obligated to comply with state definitions. However, review staff have the discretion to determine whether further review will be required, based on risk factors.</p> <p><b>Staff concur that the draft could be clarified as follows:</b> Mitigation sequencing should not apply where staff has</p>

Key	Comment	Commenters	Staff Response
			determined through a site-specific evaluation that there is not a significant geologic hazard risk.
	Comments on the geologic hazards updates, including a note to verify that the City is using the most up to date version of the Pierce County geological hazards code as a model.	Van Zwalenburg (DOE)	<b>Staff will review the draft to ensure that the appropriate provisions in the adopted County draft has been incorporated and integrated.</b>
	Support geological hazards code updates, with the following recommendations: <ul style="list-style-type: none"> <li>Strengthen the landslide hazard areas provisions to prevent loss of life.</li> <li>Designate areas depicted in DNRs mapping.</li> <li>Regulate areas greater than 50 feet/ one third of height of slope.</li> </ul>	Futurewise (02-20-19), (05-15-19)	<p><b>Staff will review these recommendations with the consultant team, and may update the Best Available Science list to reflect additional references.</b></p> <p>Of note, the proposal would already make standards more stringent and protective. The proposal integrates best practices including the approach of a minimum buffer width that is the greatest of the following: recommendation of geotechnical professional, 50 feet, or 1/3 of the height of the slope measured from the edge of the limits of the erosion or landslide hazard areas. This approach is based in part on Tacoma’s existing development patterns and the observation that where there is developable land located near the toe of slopes, it is largely encompassed within the recommended buffers.</p>
<b>TOPIC: Sea level rise</b>			
	<p>Are there additional steps that the City could take to address sea level rise as part of this package?</p> <p>The City should address sea level rise and increased coastal erosion. Require new lots and new buildings to be located outside the area of likely sea level rise or be elevated above likely sea level rise.</p>	Babbitt (Staff to the Sustainable Tacoma Commission); Futurewise 05-15-19	<p>Staff do not recommend developing or adopting standards at this time. Staff do note that the geologic hazards updates are a good first step in preparing for sea level rise because these regulations restrict development in areas that could be increasingly hazardous.</p> <p>Consideration of regulatory changes around sea level rise would merit a more comprehensive review than can be done in this minor update. Depending on the degree of predicted sea level rise the City decides to plan for, the City may need to consider significant changes to permitted development and use of</p>

Key	Comment	Commenters	Staff Response
			<p>shorelines. This is consistent with DOE guidance which recommends going back to the shoreline inventory and considering reclassifying environment designations (<i>per DOE Publication Number 11-06-010 Appendix A: Addressing Sea Level Rise in SMPs</i>).</p> <p>Several ongoing or upcoming policy initiatives will integrate sea level rise. Metro Parks Tacoma is leading an inter-jurisdictional planning process for the next 50 years of Ruston Way. The City is preparing to launch the Port/Tideflats Subarea Plan. These and other initiatives will likely result in future updates to the TSMP as well.</p> <p><b>The Commission could consider modifying the policies included in the update to more directly address the concept of adaptive management.</b> The Commission could consider things like setting the stage for “planned retreat or managed retreat” – coordinated, proactive efforts to move existing structures, roads, and utilities back away from the water’s edge. These concepts could be controversial.</p>
<b>TOPICS: General</b>			
	Support improving vegetation removal standards and biodiversity standards.	Futurewise	Support noted.
	Will the current citywide EV standards updates that STC is working on apply in the Shoreline Districts?	Babbitt (Staff to the Sustainable Tacoma Commission)	It is the City’s intent to apply EV standards consistently throughout the City, including in Shoreline Districts. <b>Staff will modify the code language as needed to ensure this is the case.</b>
	Make sure there are no conflict between the design standards of the S-8 District and the references to citywide standards being added to the TSMP.	Foss Waterway Development Authority Board	<b>Staff will review the draft to ensure there are no conflicts.</b>

Key	Comment	Commenters	Staff Response
	Require site investigations for areas that the Washington State Department of Archeology and Historic Preservation predictive model rates as “survey recommended: moderate risk,” “survey highly advised: high risk,” and “survey highly advised: very high risk.”	Futurewise (05-15-19)	<b>Staff are consulting with the Historic Preservation Program to determine if changes would be warranted as part of the current scope of work.</b>
	The critical area buffer policies and regulations should recognize that buffers can transition to native vegetation, so 6.4.3B.2 should not limit buffers to existing native vegetation.	Futurewise (05-15-19)	The proposal does not limit buffers to existing vegetation, and includes areas reserved for protection of native vegetation, water dependent uses, public access <u>and restoration</u> . Regardless of the condition of the buffer, the minimum length is required. See number 1 of this section that states a marine buffer is required on all marine shorelines to maintain the integrity, functions and processes of the shoreline. Number 3 sets out criteria that requires enhancement of the same buffers when they do not provide adequate protection.
	Buffer averaging, in proposed 6.4.3C.10, should not reduce buffers by more than 25 percent. This is necessary to protect critical areas functions.	Futurewise (05-15-19)	Staff concur. The existing code already limits buffer averaging to no less than ¾ of its original width.
	TMSP 8.2.2 includes a comprehensive set of regulations applicable to hard structural stabilization. We recommend that TSMP 6.4.7F.9 cross-reference those requirements.	Futurewise (05-15-19)	Staff concur. The proposal does reference Chapter 8, but in a different section (General Regulations 6.4.7.E).  <b>Staff recommend modifying language in that section to clarify that it is applicable to any type of use</b> (currently states single-family residential only).
	Add amendments to curtail fossil fuels.	Laslie; Cannon	This action is outside the scope of the Periodic Review. Fossil fuels will be an issue addressed in the upcoming Port/Tideflats Subarea Plan effort.
	Strengthen protections for habitat restoration and protection particularly in the tideflats.	Laslie; cannon	Integrating Biodiversity Areas/Corridors standards citywide strengthens protections for habitat areas. Changes to the

Key	Comment	Commenters	Staff Response
			Port/Tideflats updates will be addressed in the upcoming subarea plan effort.
	The regulations are consistent with legal framework prohibiting unlawful taking of property rights.	Victor (City Attorney's Office)	Noted.



## Oral Testimony Received

**Event:** Planning Commission Public Hearing No. 2  
**Subject:** Tacoma Shoreline Master Program Periodic Review  
**Date:** May 15, 2019

1. Dave Peterson – Mr. Peterson is the acting president of the Salmon Beach Improvement Club and spoke representing the Club and the Salmon Beach community as a whole. He stated that for the past few years, they have been having discussions with city and the Department of Ecology about the restrictive building regulations that have come into place. They have been asking to build up to 25 feet, but are not able to due to the restrictions in the code. Mr. Peterson also noted that the Base Flood Elevation (BFE) was raised by 4 1/2 feet a few years ago, and that will make everyone in the community ineligible for raising the height without a huge cost. They would like to strike the BFE from the requirements for minor modifications.



# EXHIBIT B: Written Comments

**From:** Barnett, Elliott  
**Sent:** Friday, April 19, 2019 3:55 PM  
**To:** Babbitt, Patrick <[PBabbitt@ci.tacoma.wa.us](mailto:PBabbitt@ci.tacoma.wa.us)>; Brenner, Shannon <[SBrenner@ci.tacoma.wa.us](mailto:SBrenner@ci.tacoma.wa.us)>; Spadoni, Lisa <[lspadoni@ci.tacoma.wa.us](mailto:lspadoni@ci.tacoma.wa.us)>; Teresa Vanderburg ([TVanderburg@esassoc.com](mailto:TVanderburg@esassoc.com)) <[TVanderburg@esassoc.com](mailto:TVanderburg@esassoc.com)>; Lynett, Kristin <[kristin.lynett@cityoftacoma.org](mailto:kristin.lynett@cityoftacoma.org)>; Spadoni, Lisa <[lspadoni@ci.tacoma.wa.us](mailto:lspadoni@ci.tacoma.wa.us)>  
**Cc:** Atkinson, Stephen <[satkinson@ci.tacoma.wa.us](mailto:satkinson@ci.tacoma.wa.us)>  
**Subject:** RE: Sustainable Tacoma Commission and FWDA Board

Hi Patrick,  
 Thanks for following up. Here are responses to the questions. We appreciate your sharing this with the STC and welcome their comments on the proposals.

Public Hearing May 15<sup>th</sup>, written comments due May 17<sup>th</sup>.

<p>Will OHWM change based on sea level rise? How would that happen? Would that shift the 200 ft Shoreline boundary?</p>	<p>The ordinary high water mark reflects the area that is influenced by the presence and action of water. As sea level rises and influences new area it will result in a new ordinary high water mark and resulting shift of the shoreline boundary landward.</p>
<p>Is there any further action on sea level rise preparedness that could be taken as part of this package?</p>	<p>Aside from policy updates, staff are not aware of other actions to address sea level rise that are both timely and appropriate for the scope of the SMP Periodic Review. It should be said that the proposed geotechnical regulations updates are a good step toward protecting bluffs which is important to sea level rise preparedness.</p> <p>Consideration of regulatory changes around sea level rise would merit a more comprehensive review than to can be done in this minor update. Depending on how much sea level rise is being planned for, the City may need to consider significant changes to permitted development and use of shorelines. This is consistent with DOE guidance which calls for going back to shoreline inventory and maybe reclassifying designations (<i>per DOE Publication Number 11-06-010 Appendix A: Addressing Sea Level Rise in SMPs</i>).</p> <p>To staff's knowledge, no other Washington jurisdictions have adopted standards to address sea level rise yet. Studies are currently underway (such as the WA Coastal Resilience Network study) which will improve understanding of sea level rise and its impacts.</p> <p>The proposal adds policies in three sections: General SMP, Critical Areas, Site Development policies. In reviewing DOE guidance, staff noted that other jurisdictions have also linked sea level with flood hazard policies. The Planning Commission could add a policy into the</p>

	<p>Flood Hazard section of the SMP, such as this policy from the City of Burien’s SMP:</p> <p>Pol. FLD 4 - Monitor sea level rise and accordingly adjust development standards and building setbacks to minimize flooding potential (Chapter II, 20.20.045, Flood Prevention and Minimization Element).</p>
<p>Are there adaptive management code approaches that we could integrate into development standards in a manner that doesn’t reflect specific sea level rise numbers (since we don’t know them at this stage)?</p>	<p>As discussed above, staff do not recommend code modifications on this topic as part of this scope.</p> <p>However, the concept of adaptive management could be more directly addressed as part of the policy updates being considered. The Commission could consider things like setting the stage for “planned retreat or managed retreat” – coordinated, proactive efforts to move existing structures, roads, and utilities back away from the water’s edge. These concepts could be controversial.</p>
<p>Since this year we are just adopting policies, when would we be changing regulations/or other strategies based on those policies?</p>	<p>Preparing for and addressing sea level rise will affect multiple governments, property owners, businesses and stakeholders and will require collaboration by multiple governmental entities.</p> <p>There are several ongoing or upcoming policy initiatives that will integrate sea level rise as part of the discussion. Metro Parks Tacoma is leading an inter-jurisdictional planning process for the next 50 years of Ruston Way. The City is preparing to launch the Port/Tideflats Subarea Plan. These and other initiatives will likely result in future updates to the TSMP as well.</p>
<p>Will the current citywide EV standards updates that STC is working on apply in the Shoreline Districts?</p>	<p>It is the City’s intent to apply EV standards consistently throughout the City, including in Shoreline Districts. Staff will modify the code language as needed to ensure this is the case.</p>

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[www.cityoftacoma.org/planning](http://www.cityoftacoma.org/planning)

**From:** Bockstiegel, Elizabeth A (DFW) [<mailto:Elizabeth.Bockstiegel@dfw.wa.gov>]

**Sent:** Monday, January 07, 2019 1:08 PM

**To:** Brenner, Shannon

**Subject:** Re: Relocating overwater residences

Shannon,

Please see my responses in red to your questions about the Salmon Beach community.

I am following up with my question about the possibility of expansion for overwater residential structures. The City is in process of updating our Shoreline Master Program and have been asked to consider an allowance for overwater residences at Salmon Beach to add a second story for those homes that currently do not have a second story. In discussions with Salmon Beach, the City expressed the need to minimize the risk from landslides as well as achieve an improved ecological condition.

One possibility that was discussed was that any allowance for a second story would require the structure to move waterward to reduce the risk from landslides and by moving to deeper water, expose intertidal areas improving the ecological conditions. The expansions would also require the structure to be raised and meet the current FEMA BFE for the area.

There are a lot of unanswered questions:

- Would moving waterward improve ecological conditions? From what I understand there is significant amounts of eel grass waterward of the homes and the City does not know the bathymetry of the site. How far would they have to move waterward to avoid the eelgrass and get to deep water? Is this feasible?

Based on the Kelp and Eelgrass in Puget Sound report (Technical Report 2007-05) published by DNR, there are floating kelp species within the Tacoma Narrows. I don't have kelp survey data for the Tacoma Narrows, and so I don't know how far waterward or how deep the water would need to be to avoid kelp or other seagrasses in the area. At this time, I don't know whether moving waterward would improve ecological conditions in the Salmon Beach area.

- Based on the close location of each home and the steep slope, they have stated that the addition of a second story would not increase shading. Would it? And what if moved away from the hillside, would setting sun now shade the intertidal between the home and hillside.

I think it is likely there could be some increased shading. I think to get an accurate estimate of shading caused by the homes, photos could be taken at various times of day at different times of year showing shading conditions and if an increase in height would increase intertidal beach shading. This type of photo-documentation is not a requirement for a HPA.

- Is this feasible under the current federal and state requirements- if the City allows expansion, can it even be permitted with state and federal agencies?

I believe Hydraulic Code WAC 220-660-380 applies to these overwater structures. I believe an upward expansion within the existing overwater footprint can be permitted. I would need to review each project on its own to determine impacts to fish life or habitat and any mitigation required.

A new (or moved) overwater structure would need to meet the requirements of a new structure under WAC 220-660-380.

At a minimum, any new overwater structures must avoid impacting macroalgae, seagrass, and kelp.

- The department will require a seagrass/macroalgae habitat survey for all new construction unless the department can determine the project will not impact seagrass and kelp beds, and in herring spawning beds other macroalgae used as spawning substrate. A survey is not required for replacement of an existing structure within its original footprint.
- Structures must be located at least twenty-five feet (measured horizontally from the nearest edge of the structure) and four vertical feet away from seagrass and kelp beds (measured at extreme low water).

It has been suggested that we require the home to be moved up to meet BFE and out to move away from the slope and beach as a prescriptive requirement for allowing a second story. However, our permitting requires that the applicant provide a report prepared by qualified biologist that addresses site specific conditions and impacts. So, while there might be a prescriptive requirement to go up and out, that would not negate a site specific assessment and additional mitigation such as grating etc.

To be sure this is feasible, I think we need a better understanding of the conditions along this stretch of beach, such as bathymetry or eel grass, or other conditions that might make the idea unsuitable. And we need to consider if other state agencies could permit it based on their policies and regulations.

I was hoping that WDFW could provide some information about critical habitat such as the eels grass in this area, bathymetry, and any other pertinent site conditions or general concerns to be sure we are well informed. I would also like to get some indication about whether WDFW could permit the relocation of an over-water structure.

I can send you the link to the Kelp and Eelgrass in Puget Sound report (Technical Report 2007-05) if that would be useful. There may be some bathymetry data for Puget Sound here (I can't see the second one, probably due to the federal government shut-down):

<https://pubs.usgs.gov/of/2001/0266/html/data.htm>

or here: <https://maps.ngdc.noaa.gov/viewers/bathymetry/>

Let me know if you have any questions.

Thanks,

**Liz Bockstiegel**

Biologist – Region 6 – Pierce County

Habitat Program

Washington Department of Fish and Wildlife

Phone: 360-480-2908

[Elizabeth.Bockstiegel@dfw.wa.gov](mailto:Elizabeth.Bockstiegel@dfw.wa.gov)

**From:** [CJ Cannon](#)  
**To:** [Planning](#)  
**Subject:** 2019 Amendment to the Comprehensive Plan and Land Use Regulatory Code  
**Date:** Friday, May 17, 2019 4:53:31 PM

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Comments to the Planning Commission re:  
2019 Amendment to the Comprehensive Plan and Land Use Regulatory Code

In addition to improving access to affordable housing, jobs, and transit, livability is defined by how it feels to be in the place that we live. Our natural environment is integral to this experience. I support and would enhance elements of the Amendment related to expanding, strengthening and extending greenways throughout the region – both inland and along the shorelines. The more we put into action the principles in 6.4.1, the more we protect and maintain what is iconic about our region. The more livable is Tacoma.

For decades, we've been gobbling up land for housing, storage facilities, strip malls, other. And when we're done with buildings, instead of updating them, we rebuild on fresh land. Let's continue to turn the tides on this sprawling approach. I support the efforts in the Plan Amendment to increase density in our developed regions. I support filling the gap of middling housing.

Re: Housing: Goals H-5

I wholly support the upgrade from "encourage" to "promote". Suggest using tax incentives or some other incentive to make energy efficiency and green building a reality. There's a trend to realize the immense energy savings by building for lower ongoing maintenance – this in turn supports lower rents/purchase prices, and lower drag on the power grid.

Recognize the need for housing—the missing middle housing. My concern is the burgeoning traffic in the Puget Sound region and noticeable and marked increase in the Tacoma area. Additional multi-unit housing brings additional multi-cars with each unit. In addition to making these neighborhoods more self-sustaining (less driving), enhance the transit infrastructure and frequency.

Let's curtail further waterfront development on undeveloped sections of Commencement Bay. Part of the wonder of living here, is while we go about our business, we can look out and see gorgeous waterscapes. More housing abutting our waterways is unappealing and unwise in anticipation of rising sea levels – akin to building on a flood plan.

Shoreline amendment:

Add an amendment that curtails future fossil fuel facilities and expansion of facilities.

I strongly support transition from fossil fuels and all efforts to decrease greenhouse gases

now. The Port of Tacoma, a valued member of our community, at times seems to weigh in more than is fair or proper on the development and activity on Commencement Bay and environs.

Estuaries and wetlands are super productive ecologically. The Port occupies huge swaths of our Puyallup River mouth and adjacent inlets. The sections dedicated to habitat restoration and protection are inadequate. Support the provisions that lead to interconnecting and expanding green spaces including throughout the mudflats.

Thank you for this opportunity to comment.

Cynthia Cannon  
5346 Broadview Avenue NE  
Tacoma

**From:** Cooper, Erin [<mailto:erin.cooper@fema.dhs.gov>]  
**Sent:** Friday, April 26, 2019 1:20 PM  
**To:** Brenner, Shannon  
**Cc:** Harris, Bryr; Van Hoff, Scott  
**Subject:** RE: City of Tacoma Redevelopment in Zone VE

Hi Shannon,

Thanks for reaching out to us on this question and thanks again for your patience as we worked to provide you a complete response.

The regulatory details below outline the reasons why FEMA cannot support the potential of local ordinance changes that would permit moving this structure waterward.

Please let us know if you have further questions for us as you work toward a decision.

Best,  
Erin

\*\*\*\*\*

Based on NFIP Minimum Standards:

**Finding #1: NFIP minimum standards do not support moving the structures seaward.**

Support:

- Federal Code 44 CFR 60.3(e)(3)

[A community must] “Provide that all new construction within Zones V1-30, VE, and V on the community’s FIRM is located landward of the reach of mean high tide.”

- *IS-9: Managing Floodplain Development through the National Flood Insurance Program*; 5-51

“New or substantially improved buildings in V Zones must be located landward of the reach of mean high tide. They cannot be built over water.”

- IBC Appendix Chapter G, adopted by the City of Tacoma per Tacoma Municipal Code 2.02.010

G401.2 Coastal high-hazard areas and coastal A zones:

“In coastal high-hazard areas and coastal A zones:

1. New buildings and buildings that are substantially improved shall only be authorized landward of the reach of mean high tide.”

**Finding #2: The relocation and additions proposed would likely constitute substantial improvement. NFIP minimum standards require that substantially improved or substantially damaged (SI/SD) structures be brought into full compliance with current regulations**

**(including elevation to mapped BFE and engineering certification on all pilings used to elevate structures), which is not likely possible in the case of these structures.**

Support:

Because these are pre-FIRM structures, it is essential that the community enforce the SI/SD portion of their ordinances. Once the costs of improvements/restorations/alterations to a pre-FIRM structure exceed 50% of that structure's market value, it must be brought into full compliance with current floodplain development regulations. All development in the regulatory floodplain requires permits, so a community must keep track of the costs of all improvements, from the time the community adopted its floodplain regulations (see definition of *new construction* below) to determine when the substantial improvement threshold has been reached. If improvements are made to these structures for which the total costs in labor, materials, construction supervision/management, overhead and profit exceed 50% of the structure's pre-improvement market value, the community must require that the structures be brought into full compliance with all current floodplain regulations as if they were new construction. This includes the requirement in Finding #1 that they be located landward of mean high tide. If current floodplain regulations cannot be met, the community cannot permit development that meets the SI/SD criteria.

- Federal Code 44 CFR 60.3(e) describes the development standards in coastal high-hazard areas (V Zones) and all standards apply to both new construction and substantial improvement.
- Important definitions from Federal Code 44 CFR 59.1

*Substantial damage* means damage of any origin sustained by a structure whereby the cost of restoring the structure to its before damaged condition would equal or exceed 50 percent of the market value of the structure before the damage occurred.

*Substantial improvement* means any reconstruction, rehabilitation, addition, or other improvement of a structure, the cost of which equals or exceeds 50 percent of the market value of the structure before the "start of construction" of the improvement. This term includes structures which have incurred "substantial damage", regardless of the actual repair work performed. The term does not, however, include either:

- (1) Any project for improvement of a structure to correct existing violations of state or local health, sanitary, or safety code specifications which have been identified by the local code enforcement official and which are the minimum necessary to assure safe living conditions or
- (2) Any alteration of a "historic structure", provided that the alteration will not preclude the structure's continued designation as a "historic structure".

*New Construction* means, for the purposes of determining insurance rates, structures for which the "start of construction" commenced on or after the effective date of an initial FIRM or after December 31, 1974, whichever is later, and includes any subsequent

improvements to such structures. For floodplain management purposes, *new construction* means structures for which the start of construction commenced on or after the effective date of a floodplain management regulation adopted by a community and includes any subsequent improvements to such structures.

Based on Puget Sound BiOp, Checklist for Programmatic Compliance:

**Finding #3: Any structures located within the Riparian Buffer Zone are within the Protected Area and subject to Endangered Species Act (ESA) compliance.**

Support:

Per the NOAA Fisheries Biological Opinion for Puget Sound, Appendix 4 – Minimum Criteria (Errata 2) & [Checklist for Programmatic Compliance](#), The Riparian Buffer Zone (RBZ) includes marine shorelines and measures perpendicularly 200’ from ordinary high water. The RBZ is a “no-disturbance zone, other than for activities that will not adversely affect habitat function.” For structures located waterward of ordinary high water, they will require compliance with US Army Corps of Engineers permitting requirements.

- Uses that are not permitted in the RBZ unless shown to not adversely affect water quality, water quantity, flood volumes, flood velocities, spawning substrate, and/or floodplain refugia for listed salmon, include “land-disturbing activity”; Relocation of structure(s) would not be without impact to several of these metrics
- Repair or remodel of existing buildings in their existing footprints is allowed.

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**Erin Cooper, CFM**

*FEMA Region X - Mitigation Division*

*Senior NFIP ESA Specialist*

*Office: 425-487-4691*

*Cell: 202-856-1927*

**From:** Croft, Rebecca D [<mailto:becca.croft@atkinsglobal.com>]  
**Sent:** Thursday, April 18, 2019 3:49 PM  
**To:** Cooper, Erin  
**Cc:** Beard, Scott; Gilbert, Michelle; Brenner, Shannon  
**Subject:** RSCX HELP DESK: Salmon Beach, City of Tacoma, Zone VE

Scott Beard called the RSC Help Desk today with a question about homes at Salmon Beach. Homes are situated on the beach at the bottom of a steep hill that is prone to sliding and there is desire to mitigate the landslide risk by moving the homes out over the water. They were built before the SFHA was mapped at that location and are now in Zone VE; recent maps increased BFE ~4ft.

I found some photos from the web which help show the issue. The question from Mr. Beard is whether there's any regulation or code that would prohibit the homes outright from being relocated further into the V Zone than they already are and, if not, what other approvals are required or considerations should be made before permitting? My notes are below, along with some researched codes and contacts that may want to weigh in (thanks to Michelle Gilbert here at the RSC). This should not be considered an exhaustive list, but a pretty good starting point:

**Assumptions:** V-Zone construction certification; elevation above new BFE, biological assessment showing no adverse impact.

**NFIP** Flood Insurance impacts. NFIP policies not available for structures entirely over water. Would affect eligibility for federally-backed mortgages.

Moving a structure = New Construction standards. "When an existing building (pre-FIRM or post-FIRM, V Zone or A Zone) is moved to a new location or site, the work is considered "new construction" and if the relocated building is in the SFHA, it must be installed so as to comply with NFIP requirements. (see [FEMA 499](#))"

WA state law prohibits new or substantially improved residential structures in a floodway (<https://app.leg.wa.gov/RCW/default.aspx?cite=86.16.041>); however, does not apply in V zones.

Tacoma is in Pierce County, BiOp regulations apply.

#### **Contacts**

- FEMA Region X NFIP Specialist for OR & Western WA: Roxanne Pilkenton [roxanne.reale-pilkenton@fema.dhs.gov](mailto:roxanne.reale-pilkenton@fema.dhs.gov)
- FEMA Region X NFIP ESA Specialist: Erin Cooper [erin.cooper@fema.dhs.gov](mailto:erin.cooper@fema.dhs.gov)
- State NFIP Coordinator: David Radabaugh, Washington Dept of Ecology [david.radabaugh@ecy.wa.gov](mailto:david.radabaugh@ecy.wa.gov)
- NFIP Regional Contact for SW Washington: Alex Rosen, WA Dept of Ecology [alex.rosen@ecy.wa.gov](mailto:alex.rosen@ecy.wa.gov)

#### **WA Shoreline Management Act:**

In Washington, for shorelines of the state, the goals and policies of the Shoreline Management Act (RCW 90.58) apply. <https://app.leg.wa.gov/RCW/default.aspx?cite=90.58.270>

The SMP Guidelines prohibit new overwater residences including floating homes, but allow improvements associated with life safety matters and property rights [WAC 173-26-241(3)(j)]. <https://fortress.wa.gov/ecy/publications/parts/1106010part12.pdf>

- Shoreline Policy Lead: Tim Gates, Washington Dept of Ecology, [tim.gates@ecy.wa.gov](mailto:tim.gates@ecy.wa.gov)

#### **US Army Corps of Engineers**

Permit needed for activities waterward of mean higher high tide. [Section 404 & 10 Nationwide Permits](#) webpage to apply for a permit from the Corps.

There are two high tide levels on the west coast; Mean High Water (MHW) and the high tide line or Mean Higher High Water (MHHW). In tidal waters, the Section 10 jurisdiction line is MHW, which is the lower high tide. The Corps' Section 404 jurisdiction line is MHHW, which is the higher high tide. In fresh water, the Section 10 jurisdiction line is the Ordinary High Water Mark (OHWM). Section 404 jurisdiction includes all areas below OHWM and any tributary rivers, streams, and adjacent wetlands of navigable waters.

[Corps User's Guide for Nationwide Permits in Washington State](#) (the User's Guide)

- Contact: Halie Endicott (206) 764-6848 [halie.endicott@usace.army.mil](mailto:halie.endicott@usace.army.mil)

### **WA State Building Codes**

Washington has adopted the 2015 I-codes. On an initial query I couldn't find anything clearly describing requirements for changing existing over-water residences.

### **Contacts:**

- Krista Braaksma [krista.braaksma@des.wa.gov](mailto:krista.braaksma@des.wa.gov)
- Ray Shipman [ray.shipman@des.wa.gov](mailto:ray.shipman@des.wa.gov)
- Richard Brown, Managing Director [richard.brown@des.wa.gov](mailto:richard.brown@des.wa.gov)



This link shows landslides: <https://www.investorspropertyervices.com/public-safety-announcement-salmon-beach-tacoma-wa/>



Here at the RSC, we aren't making any findings on whether or not this could/should be approved and hope this research is helpful for the decision makers. Please let me know if you need anything else!

**Becca Fricke-Croft, CFM**

Senior Planner II | Training & Outreach Lead  
STARR II | FEMA Region 10 Service Center

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**From:** Ryan Givens [<mailto:ryangivens@msn.com>]  
**Sent:** Friday, March 22, 2019 1:30 PM  
**To:** Barnett, Elliott <[elliott.barnett@ci.tacoma.wa.us](mailto:elliott.barnett@ci.tacoma.wa.us)>  
**Cc:** Wung, Lihuang <[LWUNG@ci.tacoma.wa.us](mailto:LWUNG@ci.tacoma.wa.us)>; Brenner, Shannon <[SBrenner@ci.tacoma.wa.us](mailto:SBrenner@ci.tacoma.wa.us)>  
**Subject:** Re: Follow-up questions

Good Afternoon Elliot (and Lihuang and Shannon)

Below are my comments for the draft geohazard code language. These are merely comments that you can add to other public feedback. I do not expect a reply/explanation. I just thought this might help you as you refine the language. I really appreciate this work, its really hard to translate this highly technical concept into code language, so GOOD JOB.

#### 6.4.7 Geologically Hazard Areas

B.2.a.i - It is unclear why we are decreasing the slopes from 25 to 15%. This seems onerous for redevelopment.

C.1.b. - It may be a public benefit if we amend the existing vegetation and create an enhanced buffer with plant species that guard against erosion. This seems to restrict pruning and "cleaning up" the property.

C.2.b. - It would be nice to have the ability to enhance the area (e.g. trim, place, etc)

D - Could we use this Small Project Waiver to approve alternations to the existing vegetation? There are going to be times when developments need to prune and clean up the property overtime while guarding against erosion.

F.9.iv.(2) - The text reads "The road is not a sole access for development" Clarify whether a pathway (ped/bike) trail would constitute a secondary access

#### 6.6.2 Regulations

3. - clarify if this administrative review can be concurrent with building permit review OR does this have to be done before an applicant can seek a building permit. (I see this review as part of a house building permit that does not necessarily involve new plats etc.)

have a great weekend (get outside)

Ryan

941-224-0483

**From:** [Maude Laslie](#)  
**To:** [Planning](#)  
**Subject:** 2019 Amendment to the Comprehensive Plan and Land Use Regulatory Code  
**Date:** Friday, May 17, 2019 5:01:22 PM

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**Comments to the Planning Commission re:  
2019 Amendment to the Comprehensive Plan and Land Use Regulatory Code**

WA State was recently named as “best state to live in by US News & World Report. Livability is defined by how it feels to be in the place that we live—in addition to housing, education and job access the natural environment is integral to making a place liveable. I support and would enhance elements of the Amendment related to expanding, strengthening and extending greenways throughout the region – both inland and along the shorelines. The more we put into action the principles in 6.4.1, the more we protect and maintain what is iconic about our region. The more livable is Tacoma.

For decades, we’ve been gobbling up land for housing, storage facilities, strip malls, other. And when we’re done with buildings, instead of updating them, we rebuild on fresh land. Let’s continue to turn the tides on this sprawling approach. I support the efforts in the Plan Amendment to increase density in our developed regions. I support filling the gap of middling housing.

Re: Housing: Goals H-5

I wholly support the upgrade from “encourage” to “promote”. Suggest using tax incentives or some other incentive to make energy efficiency and green building a reality. There’s a trend to realize the immense energy savings by building for lower ongoing maintenance – this in turn supports lower rents/purchase prices, and lower drag on the power grid.

Recognize the need for housing—the missing middle housing. My concern is the burgeoning traffic in the Puget Sound region and noticeable and marked increase in the Tacoma area. Additional multi-unit housing brings additional multi-cars with each unit. In addition to making these neighborhoods more self-sustaining (less driving), enhance the transit infrastructure and frequency.

Let’s curtail further waterfront development on undeveloped sections of Commencement Bay. Part of the wonder of living here, is while we go about our business, we can look out and see gorgeous waterscapes. More housing abutting our waterways is unappealing and unwise in anticipation of rising sea levels – akin to building on a flood plain.

Shoreline amendment:

Add an amendment that curtails future fossil fuel facilities and expansion of facilities.

I strongly support transition from fossil fuels and all efforts to decrease greenhouse gases now. The Port of Tacoma, a valued member of our community, at times seems to weigh in more than is fair or proper on the development and activity on Commencement Bay and environs.

Estuaries and wetlands are super productive ecologically. The Port occupies huge swaths of our Puyallup River mouth and adjacent inlets. The sections dedicated to habitat restoration and protection are inadequate. Support the provisions that lead to interconnecting and expanding green spaces including throughout the mudflats.

Thank you for this opportunity to comment.

Maude A. Laslie  
5346 Broadview Avenue NE  
Tacoma

Via Email: [planning@cityoftacoma.org](mailto:planning@cityoftacoma.org)

May 14, 2019

Planning Commission  
747 Market Street  
Room 349  
Tacoma WA, 98402

Re: Shoreline Master Program Periodic Review Comments

To Members of the Planning Commission,

Thank you for the opportunity to participate in updating the Shoreline Master Program, as it pertains to the community of Salmon Beach. We realize the difficulty of your position, in maintaining a balanced response to the demands of the various governing bodies, as well as the communities impacted.

Our review of the most recent draft of the Shoreline Master Program generated much discussion and confusion within our community. As a result, we request the following changes to the Proposed City of Tacoma Shoreline Master Program Revised Dated 03/20/2019.

**Requested Change 1:**

Shown in strikethrough and underline format to the draft text.

Section 2.5.B

4. A non-conforming single-family, overwater structure may expand the overall height of the structure in the following limited circumstances:

- a. The expansion may increase the height up to 25 feet from the deck level, provided it is consistent with the following limitations, which apply for all modifications or additions at any scale reviewed under this subsection:
  - i. ~~The structure meets Base Flood Elevation requirements;~~
  - ii. The expansion meets or exceeds requirements for no net loss of ecological functions by avoiding, minimizing, and mitigating any adverse impacts, including shading; and,
  - iii. The expansion meets the geological hazards requirements outlined in TSMP Section 6.4.7, provided that the outcome reduces the risk to life and property.

**Reason for Requested Change 1:** The adopted building code, in Tacoma, already requires that existing buildings meet Base Flood Elevation requirements if any Substantial Improvement, as is also defined in the current adopted building code, occurs (See 2015 International Existing Building Code Section 403.2 for example). The requirement, already in the building code, includes the provision to trigger the upgrade only if “Substantial” work is occurring. Substantial work is defined. The definition includes an assessment of the cost of work in relation to the market value of the structure before meeting Base Flood Elevation requirements would be triggered.

As proposed, any expansions in overall height, no matter how minor, would require the structure be made to be meet Base Flood Elevation requirements. Meeting Base Flood Elevation requirements means

elevating the first floor level of existing homes around 5 feet - an expensive scope of work in itself likely meeting the definition of “Substantial Improvement”, and is potentially a disproportionate requirement for minor expansions in overall height of a structure. Given that the requirement to meet Base Flood Elevation requirements is already in the adopted building code when Substantial Improvements are made, it is not necessary, and we think is unreasonable, to also include the requirement for all potential scope of work that are less than “Substantial”.

**Requested Change 2:**

Shown in strikethrough and underline format to the draft text.

Section 2.5.B

4. A non-conforming single-family, overwater structure may expand the overall height of the structure in the following limited circumstances:

- a. The expansion may increase the height up to 25 feet from the deck level, provided it is consistent with the following limitations, ~~which apply for all modifications or additions at any scale reviewed under this subsection:~~
  - i. The structure meets Base Flood Elevation requirements;
  - ii. The expansion meets or exceeds requirements for no net loss of ecological functions by avoiding, minimizing, and mitigating any adverse impacts, including shading; and,
  - iii. The expansion meets the geological hazards requirements outlined in TSMP Section 6.4.7, provided that the outcome reduces the risk to life and property.

**Reason for Requested Change 2:** The limitations remain clearly stated with our proposed change. The text proposed to be eliminated is done so as to avoid potential confusion. “All modifications ... reviewed under this subsection” could be mis-interpreted to mean even those in which overall height is not expanded but in which interior modifications are to occur.

**Requested Change 3:**

Shown in strikethrough and underline format to the draft text.

Section 2.5.B

4. ~~For the Salmon Beach Historic District, enhancement, and continuation of its use desirable and in the public interest.~~ A non-conforming single-family, overwater structure, ~~at the Salmon Beach Historic District,~~ may expand the overall height of the structure in the following limited circumstances:

- a. The expansion may increase the height up to 25 feet from the deck level, provided it is consistent with the following limitations, which apply for all modifications or additions at any scale reviewed under this subsection:
  - i. The structure meets Base Flood Elevation requirements;
  - ii. The expansion meets or exceeds requirements for no net loss of ecological functions by avoiding, minimizing, and mitigating any adverse impacts, including shading; and,
  - iii. The expansion meets the geological hazards requirements outlined in TSMP Section 6.4.7, provided that the outcome reduces the risk to life and property.

**Reason for Requested Change 3:** This change follows the proposed changes in Section 9.4. A, and is intended to reiterate and reinforce the intent expressed there. The Salmon Beach Historic District has been listed on Washington State Heritage Register since 1977. The Washington State Heritage Register is

governed by several state laws including Senate Bill 363, RCW 27.34.200 and 25-12 WAC. RCW 27.34.200 states:

***Archaeology and historic preservation—Legislative declaration.***

The legislature hereby finds that the promotion, enhancement, perpetuation, and use of structures, sites, districts, buildings, and objects of historic, archaeological, architectural, and cultural significance is desirable in the interest of the public pride and general welfare of the people of the state; and the legislature further finds that the economic, cultural, and aesthetic standing of the state can be maintained and enhanced by protecting the heritage of the state and by preventing the destruction or defacement of these assets; therefore, it is hereby declared by the legislature to be the public policy and in the public interest of the state to designate, preserve, protect, enhance, and perpetuate those structures, sites, districts, buildings, and objects which reflect outstanding elements of the state's historic, archaeological, architectural, or cultural heritage, for the inspiration and enrichment of the citizens of the state.

The promotion and enhancement of buildings making up the Salmon Beach Historic District are declared to be in the public interest per RCW 27.34.200.

The stated principles of WAC 173-26-186 and WAC 173-26-241 are to prevent damage to the natural environment and to promote mitigation policies that provide for restoration. Given the fact that Salmon Beach is legally established, a mutually beneficial coexistence is envisioned where modest improvements to existing homes could, and should, be allowed if meeting or exceeding requirements for no net loss of ecological functions can be achieved per Section 2.5.B.4.a.ii.

Thank you for your time and attention. We appreciate the City of Tacoma Department of Planning's help to ensure that the homes and families of Salmon Beach thrive over time and continue their contribution to the diversity of the city.

Sincerely,



Zeno Martin, President  
Salmon Beach North



Dave Peterson, President  
Salmon Beach Improvement Club

Vis email: [planning@cityoftacoma.org](mailto:planning@cityoftacoma.org)

May 17, 2019

Planning Commission  
747 Market Street  
Room 349  
Tacoma, WA 98402

Re: Shoreline Master Program Periodic Review - additional comments from Salmon Beach community

To Members of the Planning Commission:

In addition to the previously noted comments regarding building codes, we would also like to propose striking subheading (iii) regarding geological hazard requirements in Section 2.5.B .

We have 2 reasons for this proposed change:

1 – It is common knowledge that our homes are situated at the base of a steep slope that is prone to slide from time to time. If a permit is required for any development or improvement, it seems that this would be a waste of time (dealing with the permit process along with the Geotech study) and money (paying for the Geotech study), because it seems an obvious result that the permit would be denied (because we are situated at the bottom of a steep slope that is prone to sliding).

2 – In 1990 – '91 when the sewer system was being constructed, each member of the Salmon Beach community was required to sign a Hold Harmless agreement with the City . This agreement was signed by the City Attorney and recorded as a **legally binding document**. This agreement stated that members of Salmon Beach are willing to assume the risk of landslides from the adjacent cliff and release the city from any claims, liabilities, loss or damage for any instability of the adjacent cliff. The agreement is binding upon the cabin owners & their successors, and constitutes a covenant running with the land. ***This release agreement ends by saying “the City shall not use the cabin’s proximity to the cliff in giving consideration to such requests” (the issuance of building permits).... “now or in the future”.***

Further, the document states that the terms of this release agreement are contractual and not a mere recital.

I have attached a copy of this release agreement for your review.

Thank you for your consideration.

Sincerely,

  
*David Peterson*  
5/17/2019 1:31:16 PM PDT  
Dave Peterson, President  
Salmon Beach Improvement Club

THIS AGREEMENT is made on the 4 day of November, 1991, by the undersigned Owner(s) of the property known as Cabin Number 799, Salmon Beach, located in Salmon Beach, Tacoma, Pierce County, Washington, upon land owned by the Salmon Beach Improvement Club, Inc. or Salmon Beach North, Inc., and the City of Tacoma, a municipal corporation.

WHEREAS the original construction of said cabin pre-dated present building and shoreline codes, and the undersigned Owner(s) claim rights pursuant thereto; and

WHEREAS the undersigned Owner(s) have been advised that the cliff slopes adjacent to the property may be unstable, and are aware of the potential hazard of landslides from the adjacent cliff, and are willing to assume such risks; Now, Therefore,

RELEASE OF ALL CLAIMS

The undersigned Owner(s) of the above Cabin at Salmon Beach hereby release the City of Tacoma, its elected officials, officers, and employees ("City") from and against any and all claims, liabilities, loss or damage which may be caused by, arise out of, or in connection with the use and occupation of the Salmon Beach lands and said Cabin in proximity to a potentially unstable cliff at the Salmon Beach properties.

The intent of this release is to estop the undersigned and their successors in interest from making claim against the City for the consequences of any natural instability of the adjacent cliff. This is not a release of any active negligence of the City affecting the cliff. The undersigned does not, by executing this Release, agree to pay any costs, expenses or fees of the City not required by law.

This agreement shall be binding upon the undersigned Owner(s) and their successors in interest to the said Salmon Beach Cabin, and shall constitute a covenant running with the land.

The terms of this release agreement are contractual and not a mere recital. The undersigned state that they have carefully read the foregoing agreement, know the contents thereof, and sign the same as their free act.

Cabin No. 799

[Signature]  
Owner

Owner

STATE OF WASHINGTON )  
County of Pierce ) ss

I certify that I know or have satisfactory evidence that Kelly Reynolds and [Signature], who appeared before me, and acknowledged that (he/she/they) signed this instrument and acknowledged it to be (his/her/their) free and voluntary act for the uses and purposes mentioned in the instrument.

Dated: November 4, 1991

[Signature]  
Notary Public in and for the State of Washington, residing at Tacoma. My commission expires 10-22-93



91 NOV 25 AM 11:14  
RECORDED  
DRIAN SONNITAG  
AUDITOR PIERCE CO. WASH

CITY'S AGREEMENT

WHEREAS the above have requested services or authorization from the City of Tacoma, including connection to a sewer system and/or the issuance of building permit(s), and may request such, or similar, services or authorizations of the City in the future; IN CONSIDERATION of the pre-existing rights of said cabin and the above Release, the City shall not use the cabin's proximity to the cliff in giving consideration to such requests.

Approved as to form:

[Signature]  
Chief Assistant City Attorney

CITY OF TACOMA

[Signature]  
City Manager

[Signature]  
Division Manager

**From:** SLAUGHTER, STEPHEN (DNR) [mailto:STEPHEN.SLAUGHTER@dnr.wa.gov]  
**Sent:** Friday, May 10, 2019 2:23 PM  
**To:** Brenner, Shannon <SBrenner@ci.tacoma.wa.us>  
**Cc:** Barnett, Elliott <elliott.barnett@ci.tacoma.wa.us>  
**Subject:** RE: SMP

Hi Shannon and Elliott-

Attached are my comments to the draft SMP changes. I have a lot of comments and wish that I had more time to look at them a bit more closely. There is significant detail in them and just enough overlap that I feel there could be some slight tweaking to streamline the landslide/erosion section. If there are opportunities to work on them in the future, perhaps I could assess them in greater detail then? Currently, I am preparing for two weeks of annual leave, so there are many things I need to wrap up before I cut off all communication 😊.

One comment of concern is the BAS analysis from Robinson Noble. Did you notice that they didn't list our landslide inventory? That is slightly alarming and suggestive of a significant oversight on their part. Or perhaps they don't consider our inventory BAS?

Have a great weekend!

Stephen

**Stephen L Slaughter - LG, LEG**

Landslide Hazards Program Manager

Washington Geological Survey

Washington State Department of Natural Resources

**From:** Lyle J. Stone [mailto:lstone@geoengineers.com]  
**Sent:** Tuesday, May 14, 2019 8:27 AM  
**To:** Barnett, Elliott <elliott.barnett@ci.tacoma.wa.us>; Brenner, Shannon <SBrenner@ci.tacoma.wa.us>  
**Cc:** Layne Alfonso <lalfonso@geoengineers.com>  
**Subject:** RE: Planning Commission Public Hearings on 2019 Amendment - May 1 and 15, 2019

Hi Elliott,  
Thanks for meeting with me the other day and the follow up info.

I've compiled and summarized my comments. I haven't gone into too much detail because we discussed these in person and went over some of the reasons. If something isn't clear please give me a call and I can provide some additional thoughts.

As I stated, all these comments are from the perspective of a practicing geotechnical engineer that might be asked to apply these guidelines and standards. I haven't reviewed other standards for a comparison.

Pg 106

B.1.b.iii -- Drop "Draft". State just "latest USGS or DOE geologic map". Also, this is going to catch a lot of properties when/applied beyond the shoreline. I suggest you overlay the geologic map with the slope map and make sure that's the intent.

2.a.i – 15% is a VERY flat slope. I can't think of any instance where a slope this flat would be a concern for a landslide.

2.e – This is slightly pedantic, but a slope can't be steeper than the angle of repose, or maybe it can because "angle of repose" is more of a layman's term and not technically defined. The layman's definition can change if the moisture content changes. It might be more accurate to say "slopes that rely on cohesion for stability". Or you can leave it because people will probably know what you mean.

Pg 107

g. h. i. – These conditions do not, to my knowledge, exist in Tacoma.

k.i.2. – Don't specify the date of the map. Just say latest.

Pg 108

We discussed the PGA issue and the 1.2 FoS for seismic at length. Below is an example from USACE 1110-2-6067. Easy to find with a google search. It's not exactly what you need, but a good example of a two-step analysis. Also good example of being explicit about expected ground motions and the need to consider liquefaction and lateral spread.

Cut from PDF:

(6) Seismic Stability. Levee systems that are subjected to water loading for extended periods of time every year shall be evaluated for seismic stability. The median annual water level shall be combined with the 1% annual chance exceedance earthquake (100yr return period) load for the evaluation. The peak ground acceleration (PGA) should be determined for the levee system the using the current United States Geological Survey (USGS) ground-motion database ground motion parameter calculator found at <http://earthquake.usgs.gov/research/hazmaps/design/>. If the PGA for the 100 year earthquake is less than 0.10g, no evaluation is required. For PGAs greater than 0.10g, the levee and its foundation should be checked for liquefaction using a simplified approach (Seed, et al. 2003). Where liquefaction is indicated, the geotechnical engineer should perform a post-earthquake limit equilibrium stability analysis using an estimate of undrained

residual strength for the liquefied soils. These estimates should be based on published empirical correlations (Idriss and Boulanger 2007). Appropriate drained or undrained soil strength parameters should be used elsewhere. **If post earthquake factors of safety are greater than 1.2, then no further evaluation is necessary. For factors of safety less than 1.2, a more detailed seismic deformation analysis will be required to determine how the levee will perform in the seismic event.** Levee systems with an indication of widespread liquefaction and/or an inadequate post-earthquake factor of safety cannot be found compliant unless a more rigorous seismic deformation study demonstrates the levee system will have minor deformation and will continue to provide the required design level. Detailed seismic evaluations should assess the impacts on relief wells, toe drains, or other seepage control measures linked to the stability of the levee. Damage to these measures, the loss of (or reduced effectiveness of) these features could result in levee failure. Seepage control measures are typically located along the protected side levee toe, and are especially susceptible to damage from even relatively minor shear deformations and differential settlements.

And this should be applied to other references to seismic FoS. This might already be applied behind the scenes when applying for a buffer exception.

3. – All of Tacoma is a seismic hazard for ground shaking. This should be covered in the IBC. Suggest breaking out a separate section for Liquefaction hazards that are based on mapped geologic units. Liquefaction hazard should also call out liquefaction lateral spreading risks. Also in this is the statement that “One indicator of potential future earthquake damage is a record of earthquake damage in the past.” This is technically true but highly misleading. IBC is based on a 2,475-yr return period event. The largest recorded earthquake shaking in Tacoma was the Nisqually quake. This barely produced shaking to the 100-yr return period design event. Past performance cannot be used as criteria of meeting current seismic standards.

4. Mine hazard. We found the tunnel when drilling for the Goodwill store. Might want to add that datapoint to your doc’s. Let me know and I’ll see if I can dig up the report. You should already have it if it was submitted as part of a building permit.

6. Tsunami’s aren’t a large risk. Consider adding Seiche to this. Consider making evaluating Tsunami/seiche risk part of an evaluation of “Critical Structures” as defined by IBC in the coastal zone.

C.1.b.ii – This buffer of 1/2 slope height at the bottom is taken from IBC setback criteria for slopes. This might be appropriate in the coastal zone where there is toe erosion, but shouldn’t be necessary for keeping undisturbed vegetation down gradient of an erosion hazard.

Pg 110

3 Buffer Modification

c. – FoS thing. Also, this should say that the proposed development should not reduce the factor of safety to below the pre-development condition as well as minimum FoS’s.

4. – Setback should be defined in the GT report not on the buffer, see more later in GT report section.

Pg 112

F.1. – Regular or periodic maintenance is always required for anything. This standard effectively favors full face shot-crete over “soft armor” or native plantings or vegetation. I don’t think that’s wrong, I just don’t know if

that's what you intended. Also, if the intent is to have this apply to structures, the standard should be to have the slope stabilizing improvements (retaining walls?) should be designed with the same design life as the primary structure.

Pg. 113

F.1.g – There are legitimate and good reasons to have retaining structures next to a building for access, etc. Suggest stating that freestanding retaining structures that are within 1/2 the combined wall and slope height of a structure shall be designed to the same life and performance criteria as the adjacent structure. This avoids the sketchy rockery wall adjacent the timber frame building wall, but still allows for maintenance access, outdoor patios, etc.

F.2. – Development should also not increase or concentrate surface water (or groundwater) to critical area buffers regardless of who's property.

Pg 120

K.4 – We can't and shouldn't "certify as safe". I can get better wording, but you understand.

L.1. – Additional information could be required as well...

L1.b. – Contour lines should be mandatory. Good publicly available LiDAR exists. I don't know how you could review a report without it.

Also, BIG COMMENT HERE: The report MUST have a site plan that shows crest of slope, limit of recommended buffer, and recommended setback limits. If the building setbacks are based on a buffer then what if there is later a buffer modification? What if two people interpret the crest of slope differently? This should all be drawn on a site plan by the engineer/geologist so there is no ambiguity of their intent.

Pg 122

L.1.g.iii – Global and local stability is not defined. Suggest adding instead that assessment shall consider areas beyond the site as appropriate.

Pg 123

L.2.c. – Recommendation as to which portion of the site is "the most naturally stable and the preferred location of the structure." Is this one thing or two? The most naturally stable part of the site might not be the preferred location. No daylight basements? What if building on the most stable part of the site requires cutting a driveway through an unstable section?

This approach is only appropriate for areas that are entirely within landslide hazards and there is no alternate building site. As stated before, the standards for erosion hazard cast a wide net and to require building on the "most" stable section of a site with a 15% slope?

I understand the intent, but this needs some more thought. Both on the application and what you intend to do with the information of identifying the most stable part of the site.

**Lyle J. Stone, PE, GE**

**Associate Geotechnical Engineer | GeoEngineers, Inc.**

**Direct:** 253.722.2443

**Mobile:** 253.820.4874



816 Second Ave, Suite 200, Seattle, WA 98104  
p. (206) 343-0681  
futurewise.org

February 20, 2019

Mr. Stephen Wamback, Chair  
City of Tacoma Planning Commission  
Planning Services Division  
Planning and Development Services Department  
747 Market St., Rm 345  
Tacoma, Washington 98402

Dear Chair Wamback and Planning Commissioners:

**Subject: Comments on the Shoreline Master Program – 2019 Periodic Review.**

Sent via email to: [planning@cityoftacoma.org](mailto:planning@cityoftacoma.org); [elliott.barnett@cityoftacoma.org](mailto:elliott.barnett@cityoftacoma.org)

Thank you for the opportunity to comment on the City of Tacoma Shoreline Master Program 2019 Periodic Review. As has been reported in media and scientific reports, the southern resident orcas, or killer whales, are threatened by (1) an inadequate availability of prey, the Chinook salmon, “(2) legacy and new toxic contaminants, and (3) disturbance from noise and vessel traffic.”<sup>1</sup> “Recent scientific studies indicate that reduced Chinook salmon runs undermine the potential for the southern resident population to successfully reproduce and recover.”<sup>2</sup> A 2018 analysis by the National Oceanic and Atmospheric Administration and the State of Washington Department of Fish and Wildlife ranked the fall Chinook stocks that originate in the Puyallup River highest in importance as food sources for the southern resident killer whales.<sup>3</sup> The 2019 Shoreline Master Program Periodic Review is an opportunity to take steps to help recover the southern resident orcas, the Chinook salmon, and the species and habitats on which they depend. We support improving protections for these key species such as improved regulations to manage hard shoreline armoring and improved protections for shoreline vegetation.

Therefore, we strongly support the shoreline master program update. We do have suggestions to improve the update discussed below.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests,

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<sup>1</sup> State of Washington Office of the Governor, Executive Order 18-02 Southern Resident Killer Whale Recovery and Task Force p. 1 (March 14, 2018) last accessed on Feb. 20, 2019 at: [https://www.governor.wa.gov/sites/default/files/exe\\_order/eo\\_18-02\\_1.pdf](https://www.governor.wa.gov/sites/default/files/exe_order/eo_18-02_1.pdf) and enclosed with the electronic version of this letter with the filename: “eo\_18-02\_1.pdf.”

<sup>2</sup> *Id.*

<sup>3</sup> National Oceanic and Atmospheric Administration and the State of Washington Department of Fish and Wildlife, *Southern Resident Killer Whale Priority Chinook Stocks* p. 6 (June 22, 2018) accessed on Nov. 28, 2018 at: <https://www.documentcloud.org/documents/4615304-SRKW-Priority-Chinook-Stocks.html> and enclosed with the electronic version of this letter with the filename: “SRKW-Priority-Chinook-Stocks.pdf.”

and water resources. Futurewise has members and supporters throughout Washington State including the City of Tacoma.

## We strongly support Updating the Geologically Hazardous Area standards, but also recommend improvements

Tacoma, like many other cities along Puget Sound is susceptible to landslides. The 1949 Tacoma Narrows Landslide, in Tacoma “failed catastrophically along steep” 300 feet high bluffs overlooking Puget Sound.<sup>4</sup> The landslide ran out 500 yards, 1,500 feet, into Puget Sound.<sup>5</sup> Tacoma has also suffered from other landslides along its shorelines such as at Salmon Beach where homes were lost.<sup>6</sup>

The Shoreline Master Program (SMP) Guidelines, in WAC 173-26-221(2)(c)(ii)(B), provide: “Do not allow new development or the creation of new lots that would cause foreseeable risk from geological conditions to people or improvements during the life of the development.” Landslides are a type of geological hazards that can result in major impacts to people and property.

Four homes have been ruined at Salmon Beach in Tacoma between 1996 and 2001.<sup>7</sup> The March 22, 2014, Oso landslide “claimed the lives of 43 people, making it the deadliest landslide event in United States history. Of the approximately 10 individuals who were struck by the landslide and survived, several sustained serious injuries.”<sup>8</sup> So properly designating geologically hazardous areas and protecting people from geological hazards is very important.

It is important to understand that homeowner’s insurance does not cover the damage from landslides. “Insurance coverage for landslides is uncommon. It is almost never a standard coverage, and is difficult to purchase inexpensively as a policy endorsement.”<sup>9</sup>

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<sup>4</sup> Alan F. Chleborad, *Modeling and Analysis of the 1949 Narrows Landslide, Tacoma, Washington* xxxi ENVIRONMENTAL AND ENGINEERING GEOSCIENCE 305 p. 305 (1994) accessed on Feb. 19, 2019 at: <https://pubs.geoscienceworld.org/aeg/eeg/article-abstract/xxxi/3/305/137520/modeling-and-analysis-of-the-1949-narrows?redirectedFrom=fulltext> and the webpage and page 305 is enclosed with this letter.

<sup>5</sup> *Id.*

<sup>6</sup> Hugh Shipman, *Coastal Landsliding on Puget Sound: A review of landslides occurring between 1996 and 1999* p. 64 (Washington Department of Ecology Report #01-06-019: Aug. 2001) accessed on Feb. 19, 2019 at: <https://fortress.wa.gov/ecy/publications/documents/0106019.pdf>; Rebecca Trounson, *Tranquillity’s Risk Delivers a Loss* *Los Angeles Times* pp. 1 – 2/3 (March 02, 2001) accessed on Feb. 19, 2019 at: <http://articles.latimes.com/2001/mar/02/news/mn-32288>.

<sup>7</sup> Rebecca Trounson, *Tranquillity’s Risk Delivers a Loss* *Los Angeles Times* pp. 1 – 2/3 (March 02, 2001).

<sup>8</sup> Jeffrey R. Keaton, Joseph Wartman, Scott Anderson, Jean Benoît, John deLaChapelle, Robert Gilbert, David R. Montgomery, *The 22 March 2014 Oso Landslide, Snohomish County, Washington* p. 1 (Geotechnical Extreme Events Reconnaissance (GEER): July 22, 2014) accessed on Feb. 19, 2019 at: [http://www.geerassociation.org/index.php/component/geer\\_reports/?view=geerreports&layout=build&id=30](http://www.geerassociation.org/index.php/component/geer_reports/?view=geerreports&layout=build&id=30). If the American territories are included, then the Oso landslide is the second deadliest landslide in American history. R.M. Iverson, D.L. George, K. Allstadt, *Landslide mobility and hazards: implications of the Oso disaster* 412 EARTH AND PLANETARY SCIENCE LETTERS 197, 198 (2015).

<sup>9</sup> Robert L. Schuster & Lynn M. Highland, *The Third Hans Cloos Lecture: Urban landslides: socioeconomic impacts and overview of mitigative strategies* 66 BULLETIN OF ENGINEERING GEOLOGY AND THE ENVIRONMENT 1, p. 22 (2007) accessed on Feb. 19, 2019 at:

None of the Oso victims' homes were covered by insurance for landslide hazards.<sup>10</sup> And that is common when homes are damaged by landslides.<sup>11</sup> For example, on March 14, 2011, a landslide damaged the home of Rich and Pat Lord.<sup>12</sup> This damage required the homeowners to abandon their home on Norma Beach Road near Edmonds, Washington. Because their homeowner's insurance did not cover landslides, they lost their home.<sup>13</sup> This loss of what may be a family's largest financial asset is common when homes are damaged or destroyed by landslides or other geological hazards.

Landslide buyouts are rare and when they occur the property owner often only recovers pennies on the dollar. The property owners bought out after the Aldercrest-Banyon landslide in Kelso, Washington destroyed their homes received 30 cents on the dollar.<sup>14</sup> This underlines why preventing development in geologically hazardous areas is just plain ordinary consumer protection.

**We strongly support designating the landslide deposits, scarps and flanks, and areas with susceptibility to deep and shallow landslides identified by the State of Washington Department of Natural Resources as geologically hazardous area. See City of Tacoma Shoreline Master program (SMP) Periodic Review Best Available Science Review and Gap Analysis Matrix – Geologically Hazardous Areas Prepared by Robison-Noble p. 5 of 13 (Feb. 2019)**

The State of Washington Department of Natural Resources is preparing detailed landslide inventories which are then used to prepare landslide susceptibility maps throughout Washington State.<sup>15</sup> The Pierce County Landslide Inventory was the first countywide inventory prepared using the Department of Natural Resources' landslide inventory mapping protocol.<sup>16</sup> The "[s]usceptibility maps aid in estimating the potential for future landslides."<sup>17</sup>

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[ftp://193.134.202.10/pub/TRAMM/Workshop\\_EWS/Literature/Schuster\\_and\\_Highland\\_2007\\_Bulletin\\_of\\_Engineering\\_Geology\\_and\\_the\\_Environment.pdf](ftp://193.134.202.10/pub/TRAMM/Workshop_EWS/Literature/Schuster_and_Highland_2007_Bulletin_of_Engineering_Geology_and_the_Environment.pdf)

<sup>10</sup> Sanjay Bhatt, *Slide erased their homes, but maybe not their loans* *The Seattle Times* (April 2, 2014) accessed on Feb. 19, 2019 at: [http://old.seattletimes.com/html/latestnews/2023278858\\_mudslidefinancialxml.html](http://old.seattletimes.com/html/latestnews/2023278858_mudslidefinancialxml.html)

<sup>11</sup> *Id.*

<sup>12</sup> Ian Terry, *Abandoned and trashed after mudslide, Edmonds house now for sale* *The Herald* (Feb. 11, 2015). The house is for sale after the bank who held the Lord's mortgage took ownership of the home. *Id.* accessed on Feb. 19, 2019 at: <http://www.heraldnet.com/article/20150211/NEWS01/150219829>.

<sup>13</sup> *Id.* at p. \*6.

<sup>14</sup> Isabelle Sarikhan, *Sliding Thought Blog, Washington's Landslide Blog* Landslide of the Week – Aldercrest Banyon Landslide July 29, 2009 accessed on Feb. 19, 2019 at: <https://slidingthought.wordpress.com/2009/07/29/landslide-of-the-week-aldercrest-banyon-landslide/>

<sup>15</sup> Katherine A. Mickelson and Stephen L. Slaughter, *Washington State's New Landslide Inventory Mapping Protocol* (Washington Department of Natural Resources, Washington Geological Survey, Geological Society of America Annual Meeting in Seattle, Washington, USA, Session 252:T244. Landslide Inventories, Databases, Hazard Maps, Risk Analysis, and Beyond (Posters), Paper No. 252-5: Oct. 24, 2017) accessed on Feb. 19, 2019 at: [https://www.dnr.wa.gov/publications/ger\\_presentations\\_gsa\\_2017\\_mickelson.pdf](https://www.dnr.wa.gov/publications/ger_presentations_gsa_2017_mickelson.pdf).

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

These maps are science-based inventories available for all of Tacoma. Futurewise strongly supports designating the landslide deposits, scarps and flanks, and areas with susceptibility to deep and shallow landslides identified by the State of Washington Department of Natural Resources in the Pierce County Landslide Inventory as geologically hazardous area. We believe this is consistent with your consultant's recommendation.<sup>18</sup> This will better protect people and property.

Landslides are capable of damaging commercial, residential, or industrial development at both the tops and toes slopes due to the earth sliding and other geological events.<sup>19</sup> So the areas at the top, toe, and sides of the slope are geological hazards. We recommend these areas be designated as landslide hazards.

### **Require the review of geologically hazardous areas capable of harming buildings or occupants on a development site**

We recommend that the regulations require review of any landslide capable of damaging the proposed development. Geological hazards, such as landslides are capable of damaging property outside the hazard itself. The 1949 Tacoma Narrows Landslide ran out 1,500 feet into Puget Sound.<sup>20</sup> The 2014 Oso slide ran out for over a mile (5,500 feet) even through the slope height was 600 feet.<sup>21</sup> A 2006 landslide at Oso traveled over 300 feet.<sup>22</sup> Recent research shows that long runout landslides are more common than had been realized.<sup>23</sup> This research documents that over the past 2000 years, the average landslide frequency of long runout landslides in the area near the Oso landslide is one landslide every 140 years.<sup>24</sup> The landslides ran out from 787 feet to the 2,000 feet of the 2014 landslide.<sup>25</sup> So we recommend that Tacoma require review of all geological hazards capable of harming a proposed lot or building site.

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<sup>18</sup> City of Tacoma Shoreline Master program (SMP) Periodic Review Best Available Science Review and Gap Analysis Matrix – Geologically Hazardous Areas Prepared by Robison-Noble p. 5 of 13 (Feb. 2019).

<sup>19</sup> Jeffrey R. Keaton, Joseph Wartman, Scott Anderson, Jean Benoît, John deLaChapelle, Robert Gilbert, David R. Montgomery, *The 22 March 2014 Oso Landslide, Snohomish County, Washington* p. 1 & p. 68 (Geotechnical Extreme Events Reconnaissance (GEER): July 22, 2014).

<sup>20</sup> Alan F. Chleborad, *Modeling and Analysis of the 1949 Narrows Landslide, Tacoma, Washington* xxxi ENVIRONMENTAL AND ENGINEERING GEOSCIENCE 305 p. 305 (1994).

<sup>21</sup> Jeffrey R. Keaton, Joseph Wartman, Scott Anderson, Jean Benoît, John deLaChapelle, Robert Gilbert, David R. Montgomery, *The 22 March 2014 Oso Landslide, Snohomish County, Washington* p. 56 & p. 144 (Geotechnical Extreme Events Reconnaissance (GEER): July 22, 2014).

<sup>22</sup> *Id.* at p. 1.

<sup>23</sup> Sean R. LaHusen, Alison R. Duvall, Adam M. Booth, and David R. Montgomery, *Surface roughness dating of long-runout landslides near Oso, Washington (USA), reveals persistent postglacial hillslope instability* GEOLOGY pp. \*2 – 3, published online on 22 December 2015 as doi:10.1130/G37267.1; Geological Society of America (GSA) Data Repository 2016029, *Data repository for: Surface roughness dating of long-runout landslides near Oso, WA reveals persistent postglacial hillslope instability* p. 4 both enclosed with the paper original of this letter. Geology is a peer-reviewed scientific journal. Geology – Prep webpage accessed on Jan. 23, 2018 at:

<http://www.geosociety.org/GSA/Publications/Journals/Geology/GSA/Pubs/geology/home.aspx#overview> and enclosed with the paper original of this letter.

<sup>24</sup> Sean R. LaHusen, Alison R. Duvall, Adam M. Booth, and David R. Montgomery, *Surface roughness dating of long-runout landslides near Oso, Washington (USA), reveals persistent postglacial hillslope instability* GEOLOGY p. \*2, published online on 22 December 2015 as doi:10.1130/G37267.1.

<sup>25</sup> Geological Society of America (GSA) Data Repository 2016029, *Data repository for: Surface roughness dating of long-runout landslides near Oso, WA reveals persistent postglacial hillslope instability* p. 4.

**Do not limit landslide buffers to 50 feet or one third of the height of the slope for the top of slope buffer or half the height of the slope for the bottom of slope buffer. See City of Tacoma Shoreline Master program (SMP) Periodic Review Best Available Science Review and Gap Analysis Matrix – Geologically Hazardous Areas Prepared by Robison-Noble pp. 10 – 11 of 13 (Feb. 2019)**

Landslides in Tacoma and Western Washington are capable of running out significant distances. The 1949 Tacoma Narrows Landslide, in Tacoma “failed catastrophically along steep” 300 feet high bluffs and ran out 1,500 feet into Puget Sound.<sup>26</sup> This is five times the buff height. The 2014 Oso slide ran out for over a mile (5,500 feet) even through the slope height was 600 feet.<sup>27</sup> This was nine times the slope height. The 2013 Ledgewood-Bonair Landslide on Whidbey Island extended approximately 300 feet into Puget Sound.<sup>28</sup> In a study of shallow landslides along Puget Sound from Seattle to Everett, the average runout length was 197.5 feet (60.2 m) and the maximum runout length was 771 feet (235 m).<sup>29</sup> So limiting landslide buffers to 50 feet or one third of the height of the slope for the top of slope buffer or half the height of the slope for the bottom of slope buffer will not adequately protect people and property.

The Joint SR 530 Landslide Commission recommends identifying “[c]ritical area buffer widths based on site specific geotechnical studies” as an “innovative development regulation[]” that counties and cities should adopt.<sup>30</sup> So we support the part of the landslide buffer recommendation that is based on the minimum distance recommended by the geotechnical professional.<sup>31</sup> Construction should not be allowed in these areas.

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<sup>26</sup> Alan F. Chleborad, *Modeling and Analysis of the 1949 Narrows Landslide, Tacoma, Washington* xxxi ENVIRONMENTAL AND ENGINEERING GEOSCIENCE 305 p. 305 (1994).

<sup>27</sup> Jeffrey R. Keaton, Joseph Wartman, Scott Anderson, Jean Benoît, John deLaChapelle, Robert Gilbert, David R. Montgomery, *The 22 March 2014 Oso Landslide, Snohomish County, Washington* p. 56 & p. 144 (Geotechnical Extreme Events Reconnaissance (GEER): July 22, 2014).

<sup>28</sup> Stephen Slaughter, Isabelle Sarikhan, Michael Polenz, and Tim Walsh, *Quick Report for the Ledgewood-Bonair Landslide, Whidbey Island, Island County, Washington* pp. 3 – 4 (Washington State Department of Natural Resources, Division of Geology and Earth Resources: March 28, 2013) accessed on Feb. 19, 2019 at:

[http://www.dnr.wa.gov/publications/ger\\_qr\\_whidbey\\_island\\_landslide\\_2013.pdf](http://www.dnr.wa.gov/publications/ger_qr_whidbey_island_landslide_2013.pdf) and enclosed with the paper original of this letter.

<sup>29</sup> Edwin L. Harp, John A. Michael, and William T. Laprade, *Shallow-Landslide Hazard Map of Seattle, Washington* p. 17 (U.S. Geological Survey Open-File Report 2006–1139: 2006) accessed on Feb. 19, 2019 at:

<http://pubs.usgs.gov/of/2006/1139/> and enclosed with the paper original of this letter.

<sup>30</sup> The SR 530 Landslide Commission, *Final Report* p. 31 (Dec. 15, 2014) accessed on Feb. 19, 2019 at:

[http://www.governor.wa.gov/sites/default/files/documents/SR530LC\\_Final\\_Report.pdf](http://www.governor.wa.gov/sites/default/files/documents/SR530LC_Final_Report.pdf) and enclosed with the paper original of this letter.

<sup>31</sup> City of Tacoma Shoreline Master program (SMP) Periodic Review Best Available Science Review and Gap Analysis Matrix – Geologically Hazardous Areas Prepared by Robison-Noble p. 11 of 13 (Feb. 2019).

**We support the Shoreline Erosion Hazard Development Standards. See City of Tacoma Shoreline Master program (SMP) Periodic Review Best Available Science Review and Gap Analysis Matrix – Geologically Hazardous Areas Prepared by Robison-Noble pp. 6 – 9 of 13 (Feb. 2019)**

We support the Shoreline Erosion Hazard Development Standards. Bulkheads and other forms of hard shoreline armoring cause significant adverse impacts to the environment of Puget Sound.<sup>32</sup> They should be allowed only when they are needed.

**We support addressing sea level rise and increased coastal erosion in the SMP Update.**

The Shoreline Management Act and Shoreline Master Program Guidelines require shoreline master programs to address the flooding that will be caused by sea level rise. RCW 90.58.100(2)(h) requires that shoreline master programs “shall include” “[a]n element that gives consideration to the statewide interest in the prevention and minimization of flood damages ...” WAC 173-26-221(3)(b) provides in part that “[o]ver the long term, the most effective means of flood hazard reduction is to prevent or remove development in flood-prone areas ...” The areas subject to sea level rise are flood prone areas just the same as areas along bays, rivers, or streams that are within the 100-year flood plain. We support the staff recommendation to address sea level rise in the SMP Update.

Sea level rise is a real problem that is happening now. Sea level is rising and floods and erosion are increasing. In 2012 the National Research Council concluded that global sea level had risen by about seven inches in the 20<sup>th</sup> Century.<sup>33</sup> The new report *Projected Sea Level Rise for Washington State – A 2018 Assessment* projects that for a low greenhouse gas emission scenario there is a 50 percent probability that sea level rise will reach or exceed 1.8 feet by 2100 for much of Tacoma’s marine shorelines.<sup>34</sup> *Projected Sea Level Rise for Washington State – A 2018 Assessment* projects that for a higher emission scenario there is a 50 percent probability that sea level rise will reach or exceed 2.3 feet by 2100 for much of Tacoma’s marine shorelines.<sup>35</sup> Projections are available for all of the marine shorelines in

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<sup>32</sup> Megan N. Dethier, Wendel W. Raymond, Aundrea N. McBride, Jason D. Toft, Jeffery R. Cordell, Andrea S. Ogston, Sarah M. Heerhartz, Helen D. Berry, *Multiscale impacts of armoring on Salish Sea shorelines: Evidence for cumulative and threshold effects* 175 *Estuarine, Coastal and Shelf Science* 106 pp. 114 – 16 (2016) enclosed with the paper original of this letter. *Estuarine, Coastal and Shelf Science* is a peer-reviewed scientific journal. *Estuarine, Coastal and Shelf Science Author Information Pack* pp. 9 – 11 (20 Feb 2019) accessed on Feb. 19, 2019 at: <https://www.journals.elsevier.com/estuarine-coastal-and-shelf-science> and enclosed with the paper original of this letter.

<sup>33</sup> National Research Council, *Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future* p. 23, p. 156, p. 96, p. 102 (2012) accessed on Feb. 19, 2019 at: <https://www.nap.edu/download/13389>.

<sup>34</sup> *Relative Sea Level Projections for RCP 4.5 for the Coastal Area Near: 47.3N, 122.5W* accessed on Feb. 19, 2019 at: <http://www.wacoastalnetwork.com/wcrp-documents.html> and enclosed with this letter. The methodology used for these projections is available in Miller, I.M., Morgan, H., Mauer, G., Newton, T., Weldon, R., Schmidt, D., Welch, M., Grossman, E., *Projected Sea Level Rise for Washington State – A 2018 Assessment* (A collaboration of Washington Sea Grant, University of Washington Climate Impacts Group, Oregon State University, University of Washington, and US Geological Survey. Prepared for the Washington Coastal Resilience Project: 2018) available at the prior webpage and enclosed with the paper original of this letter.

<sup>35</sup> *Relative Sea Level Projections for RCP 8.5 for the Coastal Area Near: 47.3N, 122.5W* accessed on Feb. 19, 2019 at: <http://www.wacoastalnetwork.com/wcrp-documents.html> and enclosed with this letter.

Washington State. The general extent of the projected sea level rise currently projected for coastal waters can be seen on the NOAA Office for Coastal Management Digitalcoast Sea Level Rise Viewer available at: <https://coast.noaa.gov/digitalcoast/tools/slr.html>

Projected sea level rise will substantially increase flooding. As Ecology writes, “[s]ea level rise and storm surge[s] will increase the frequency and severity of flooding, erosion, and seawater intrusion—thus increasing risks to vulnerable communities, infrastructure, and coastal ecosystems.”<sup>36</sup> Not only our marine shorelines will be impacted, as Ecology writes “[m]ore frequent extreme storms are likely to cause river and coastal flooding, leading to increased injuries and loss of life.”<sup>37</sup>

A peer-reviewed scientific study ranked Washington State 14<sup>th</sup> in terms of the number of people living on land less than one meter above local Mean High Water compared to the 23 contiguous coastal states and the District of Columbia.<sup>38</sup> This amounted to an estimated minimum of 18,269 people in 2010.<sup>39</sup> Zillow recently estimated that 31,235 homes in Washington State may be underwater by 2100, 1.32 percent of the state’s total housing stock. The value of the submerged homes is an estimated \$13.7 billion.<sup>40</sup> Zillow wrote:

It’s important to note that 2100 is a long way off, and it’s certainly possible that communities [may] take steps to mitigate these risks. Then again, given the enduring popularity of living near the sea despite its many dangers and drawbacks, it may be that even more homes will be located closer to the water in a century’s time, and these estimates could turn out to be very conservative. Either way, left unchecked, it is clear the threats posed by climate change and rising sea levels have the potential to destroy housing values on an enormous scale.<sup>41</sup>

Sea level rise will have an impact beyond rising seas, floods, and storm surges. The National Research Council wrote that:

Rising sea levels and increasing wave heights will exacerbate coastal erosion and shoreline retreat in all geomorphic environments along the west coast. Projections of future cliff and bluff retreat are limited by sparse data in Oregon and Washington and by a high degree of geomorphic variability along the coast. Projections using only historic rates of cliff erosion predict 10–30 meters [33 to 98 feet] or more of

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<sup>36</sup> State of Washington Department of Ecology, *Preparing for a Changing Climate Washington State’s Integrated Climate Response Strategy* p. 90 (Publication No. 12-01-004: April 2012) accessed on Feb. 19, 2019 at: <https://fortress.wa.gov/ecy/publications/summarypages/1201004.html> and enclosed with the paper original of this letter.

<sup>37</sup> *Id.* at p. 17.

<sup>38</sup> Benjamin H. Strauss, Remik Ziemiński, Jeremy L. Weiss, and Jonathan T. Overpeck, *Tidally adjusted estimates of topographic vulnerability to sea level rise and flooding for the contiguous United States* 7 ENVIRON. RES. LETT. 014033, 4 (2012) accessed on Sept. 26, 2018 at: <http://iopscience.iop.org/1748-9326/7/1/014033/article> This journal is peer reviewed. Environmental Research Letters “Submission requirements” webpage accessed on Sept. 26, 2018 at: <http://iopscience.iop.org/1748-9326/page/Submission%20requirements>.

<sup>39</sup> *Id.*

<sup>40</sup> Krishna Rao, *Climate Change and Housing: Will a Rising Tide Sink all Homes?* ZILLOW webpage (8/2/2016) last accessed on Feb. 19, 2019 at: <http://www.zillow.com/research/climate-change-underwater-homes-12890/>.

<sup>41</sup> *Id.*

retreat along the west coast by 2100. An increase in the rate of sea-level rise combined with larger waves could significantly increase these rates. Future retreat of beaches will depend on the rate of sea-level rise and, to a lesser extent, the amount of sediment input and loss.<sup>42</sup>

A recent paper estimated that “[a]nalysis with a simple bluff erosion model suggests that predicted rates of sea-level rise have the potential to increase bluff erosion rates by up to 0.1 m/yr [meter a year] by the year 2050.”<sup>43</sup> This translates to four additional inches of bluff erosion a year.

A recent peer-reviewed article estimated that up to 8,017 people in Pierce County will be at risk of adverse impacts from sea level rise in 2100.<sup>44</sup> The time to adopt protective measures is now.

Homes built today are likely to be in use 2100. And new lots created today will be in use in 2100. This is why the Washington State Department of Ecology recommends “[l]imiting new development in highly vulnerable areas.”<sup>45</sup>

Therefore, we recommend that the SMP update require that new lots and new buildings be located outside the area of likely sea level rise and if that is not possible, buildings should be elevated above the likely sea level rise.

## We support improving the requirements to maintain and enhance vegetation in shoreline jurisdiction

The report *Protecting Nearshore Habitat and Functions in Puget Sound* documents marine riparian vegetation is important to maintaining the health of Puget Sound.

Riparian vegetation contributes to the foodweb by providing large woody debris and organic matter, important to many species, and creates habitat for insects and marine invertebrates that are important food sources for fish and other aquatic life. Vegetation in tidal plains provides refuge for juvenile salmon and shades shallow water to maintain cooler temperatures that are necessary for the survival of salmon

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<sup>42</sup> National Research Council, *Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future* p. 135 (2012).

<sup>43</sup> George M. Kaminsky, Heather M. Baron, Amanda Hacking, Diana McCandless, David S. Parks, *Mapping and Monitoring Bluff Erosion with Boat-based LIDAR and the Development of a Sediment Budget and Erosion Model for the Elwha and Dungeness Littoral Cells, Clallam County, Washington* p. 3 last accessed on Feb. 19, 2019 at: [http://www.coastalwatershedinstitute.org/Final%20Report\\_Clallam%20County%20Bluffs%202014\\_Final%20revised.pdf](http://www.coastalwatershedinstitute.org/Final%20Report_Clallam%20County%20Bluffs%202014_Final%20revised.pdf).

<sup>44</sup> Mathew E. Hauer, Jason M. Evans, and Deepak R. Mishra, *Millions projected to be at risk from sea-level rise in the continental United States* NATURE CLIMATE CHANGE Letters Advance Online Publication p. 3 (Published Online: 14 March 2016 | DOI: 10.1038/NCLIMATE2961). Nature Climate Change is a peer-reviewed science journal. See the Author Instructions accessed on Nov. 26, 2018 at: [http://mts-nclim.nature.com/cgi-bin/main.plex?form\\_type=display\\_auth\\_instructions](http://mts-nclim.nature.com/cgi-bin/main.plex?form_type=display_auth_instructions).

<sup>45</sup> State of Washington Department of Ecology, *Preparing for a Changing Climate Washington State's Integrated Climate Response Strategy* p. 90 (Publication No. 12-01-004: April 2012).

and other species. Large trees, which shade the upper intertidal zone is especially important for maintaining forage fish spawning habitat.

Marine riparian vegetation also protects water quality and reduces surface erosion by slowing run off. Terrestrial and shoreline vegetation acts as a filter for runoff, while submerged vegetation causes sediments to settle out of the water column. By slowing erosion and retaining sediments, riparian vegetation reduces pollutants including nitrogen, phosphorus, hydrocarbons, PCBs, metals, and pesticides. It also prevents excessive turbidity, which can smother eggs and aquatic vegetation.<sup>46</sup>

Removing or disturbing this native vegetation results in reduced ecological functions as does decreasing the width of the vegetated riparian area, reducing plant density, and reducing plant diversity.<sup>47</sup> So maintaining vegetation in shoreline jurisdiction is important to conserving and recovering salmon and other species including the Chinook salmon on which the Southern Resident Orcas depend. So, we support improvements in the requirements to maintain and enhance vegetation in shoreline jurisdiction.

## **Integrate the City's Biodiversity Areas/Corridors standards in the TSMP**

We support integrating the Tacoma Biodiversity Areas and Corridors standards into the shoreline master program update. This will improve protections for important fish and wildlife habitats.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 Ext. 102 and email: [tim@futurewise.org](mailto:tim@futurewise.org).

Very Truly Yours,



Tim Trohimovich, AICP  
**Director of Planning & Law**

Enclosures

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<sup>46</sup> EnviroVision, Herrera Environmental, and Aquatic Habitat Guidelines Program, *Protecting Nearshore Habitat and Functions in Puget Sound* p. II-39 – II-40 (October 2007, Revised June 2010) accessed on Feb. 20, 2019 at: <https://wdfw.wa.gov/publications/00047/> and enclosed with the paper original of this letter.

<sup>47</sup> *Id.* at p. II-43.

# Environmental and Engineering Geoscience

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RESEARCH ARTICLE | SEPTEMBER 01, 1994

## Modeling and Analysis of the 1949 Narrows Landslide, Tacoma, Washington

ALAN F. CHLEBORAD

Environmental and Engineering Geoscience (1994) xxxi (3): 305-327.

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## Abstract

A large landslide failed catastrophically along steep, 90-m (300-ft) high bluffs overlooking the waters of Puget Sound at Tacoma, Washington, in April of 1949, three days after the region was struck by a magnitude 7.1 earthquake. The area of failure was investigated to estimate the static and seismic stability of the pre-earthquake slope and to identify factors that contributed to the failure. Results of static analyses suggest that the slope was marginally stable and that high ground-water conditions would have significantly reduced slope stability. The Newmark analysis of dynamic (seismic) slope stability was used to calculate predicted inertial displacements for the landslide for a range of possible material property and ground-water conditions. Comparison of predicted displacements with a reported displacement suggests that the ground motion could have initiated the large-scale failure. Results of the study provide a basis for discussion and comparison of similar bluffs in the Puget Sound region that may be susceptible to catastrophic, earthquake-induced slope failure.

## GeoRef Subject

Pierce County Washington United States engineering geology earthquakes Puget Sound slope stability Puget Lowland Tacoma Washington Washington

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## First Page Preview



## Modeling and Analysis of the 1949 Narrows Landslide, Tacoma, Washington

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### ABSTRACT

A large landslide failed catastrophically along steep, 90-m (300-ft) high bluffs overlooking the waters of Puget Sound at Tacoma, Washington, in April of 1949, three days after the region was struck by a magnitude 7.1 earthquake. The area of failure was investigated to estimate the static and seismic stability of the pre-earthquake slope and to identify factors that contributed to the failure. Results of static analyses suggest that the slope was marginally stable and that high ground-water conditions would have significantly reduced slope stability. The Newmark analysis of dynamic (seismic) slope stability was used to calculate predicted inertial displacements for the landslide for a range of possible material property and ground-water conditions. Comparison of predicted displacements with a reported displacement suggests that the ground motion could have initiated the large-scale failure. Results of the study provide a basis for discussion and comparison of similar bluffs in the Puget Sound region that may be susceptible to catastrophic, earthquake-induced slope failure.

### INTRODUCTION

The Tacoma Narrows landslide failed catastrophically at approximately 3:00 a.m. the morning of April 16, 1949, three days after the Puget Sound region was struck by a magnitude 7.1 (Ms) earthquake (U. S. Army Corps of Engineers, 1949). The failure (Figure 1), located along a 90-m (300-ft) high, steep bluff overlooking the Tacoma Narrows at Point Defiance Park in Tacoma, Washington, received much publicity in the local press due to its catastrophic nature, its size (volume  $\sim 50 \times 10^4 \text{ m}^3$  [ $65 \times 10^4 \text{ yds}^3$ ]), and because of concern that additional landsliding might threaten waterfront homes located immediately to the south along Salmon Beach.

Although there were no eyewitness accounts of the failure, several local newspapers published photographs, descriptions, and first-hand accounts of its effects. The following are excerpts from selected newspaper accounts published shortly after the occurrence (Vogel, 1949a; 1949b):

“ .....A terrific roar awakened the townspeople as the great mass of earth rumbled 500 yards out into Puget Sound. The Sound waters receded 20 to 25 ft from normal tide line with an ominous sucking sound. Then an 8-ft tidal wave rushed back against the beach, smashing small boats, dock areas, a wooden boardwalk and other waterfront installations ..... ”

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# SOUTHERN RESIDENT KILLER WHALE PRIORITY CHINOOK STOCKS

## Outline of Prey Prioritization Conceptual Model

NOAA and WDFW have developed a framework to identify Chinook salmon stocks that are important to Southern Resident killer whales to assist in prioritizing actions to increase critical prey for the whales. The framework currently includes three factors that contribute to the identification of priority Chinook salmon populations. Note, here “population” could mean management unit, stock, ESU, run, etc. Each of the three factors has a range of scores which affects its weight. For each Chinook population ranging from Southeastern Alaska to California, a total score is calculated by adding up the three individual factor scores. The Chinook salmon populations with the highest total scores are considered the highest priority to increase abundance to benefit the whales. Several sensitivity analyses provided initial help in understanding how the weighting/scoring affects the priority list. The conceptual model, factors, and scoring were reviewed at a workshop sponsored by the National Fish and Wildlife Foundation and modifications were made to incorporate feedback from participants. The factors, scoring and priority list can be adapted as new scientific information becomes available.

The three evaluation factors include:

### **FACTOR 1- Observed Part of SRKW Diet**

Description and data sources: Prey tissues/scales and fecal samples have been collected from 2004 – present (Hanson et al. 2010, Ford et al. 2016, Hanson et al. in prep). From the prey tissues/scales collected, Genetic Stock Identification (GSI) were run to identify the Chinook stocks in the diet. The majority of samples have been collected in the summer months in inland waters of WA and B.C.

#### Assumption

- Chinook populations that have been observed in the diet will have higher priority than those that have not.

**Caveat:** There is currently no spatial correction factor for sample collection (stocks originating from near the sample locations are more likely to be collected), no correction factor for abundance (more abundant stocks are more likely to be identified in the diet), and no correction factor for potential whale selectivity (older, larger fish more likely to be recovered in scale samples).

### **FACTOR 2- Consumed During Reduced Body Condition or Diversified SRKW Diet**

Description and data sources: For the second factor, “Consumed During Reduced Body Condition or Diverse Diet”, stocks consumed during times of potential reduced body condition and increased diet diversity receive additional weight.

Since 2008, NOAA's SWFSC has used aerial photogrammetry to assess the body condition and health of SRKWs, initially in collaboration with the Center for Whale Research and, more recently, with the Vancouver Aquarium and SR<sup>3</sup>. Photogrammetry data has been collected during seven field efforts in five years, including September 2008, 2013, and 2015, and May and September 2016 and 2017 (Durban et al. 2017; Fearnbach et al. 2018). The proportion of Chinook salmon consumed in whales' diet was estimated by season and region (inland vs coastal waters) using the data from prey tissues/scales and fecal samples (Hanson et al. 2010, Ford et al. 2016, Hanson et al. in prep).

### Assumptions

- Reduced body condition and diverse diet occurs from Oct through May.
- Whales switch from preferred prey, Chinook salmon, to other salmonids or prey when Chinook are less available.

### **FACTOR 3- Degree of Spatial and Temporal Overlap**

Description and data sources: Recent prey mapping from Shelton et al. in press (CWT data) was used to assess the overlap in time and space distribution of individual fall Chinook salmon stocks and SRKWs. The distribution/timing of all Chinook salmon stocks across the whales' range from California to Southwest Vancouver Island (and the inland waters of the Salish Sea) was divided into weighted spatial/temporal areas. Currently, Shelton et al. in press includes detailed information on fall runs. Available data for spring Chinook was included, but detailed analyses of data from spring runs are in progress and will be completed in the next two years, incorporating both recoveries in directed Chinook troll fisheries, and Chinook recovered as bycatch in fisheries not targeting Chinook.

For spring run Chinook we relied on reports from the Chinook Technical Committee of the Pacific Salmon Commission (PSC 2018a, 2018b) and published literature (e.g. Satterthwaite et al. 2013, Wahle et al. 1981, Weitkamp 2010) to assign approximate ocean distributions. For stocks with less information, we assumed that the risk to predation was low in seasons and regions that did not correspond to the return timing and origin of each stock (for example, Columbia spring Chinook are assumed to be most available to whales in winter and spring months near the mouth of the Columbia River, but because of their approximate ocean distribution, they are not available in other regions or seasons – particularly mid-summer to fall). Because of limited recoveries, we also assumed that for stocks returning to the Salish Sea (Strait of Georgia, Puget Sound), the distribution was similar in the Salish Sea to Southwest Vancouver Island distributions.

The spatial/temporal Areas currently include: 1) Southwest Vancouver Island (WCVI); 2) Salish Sea; 3) Cape Falcon, Oregon north to British Columbia border; 4) Cape Falcon, OR south to Cape Mendocino (northern California); 5) Cape Mendocino, CA to Point Sur, CA. Seasons are defined as: Spring: April-May; Summer: June-July; Fall: Aug-Oct; Winter: November-March. These areas

reflect the division of Chinook run timing (approximately), correspond to periods of coded wire tag recoveries in fisheries, and correspond to predictable patterns of SRKW movement. SRKW distribution data was assessed from multiple sources (e.g. Center for Whale Research, The Whale Museum, NWFSC satellite tagging, NWFSC coastal hydrophones, coastal spring/winter NWFSC cruises, other opportunistic observations).

### Assumptions

- Chinook salmon stocks that overlap in space and time are potential prey.
- Chinook salmon stocks that have a higher degree of overlap in space and time have a higher priority than stocks that have a relatively lower degree of overlap.
- Weighted spatial/temporal areas accommodate variation in the distribution of SRKW and Chinook salmon

**Caveat-** CWT model interpolates movement of stocks seasonally to account for gaps in fishing effort. Also, the hatchery releases going into the CWT model are not comprehensive, but rather model the distribution of major stock groupings. Within regions and run type (e.g. fall Puget Sound), the ocean distribution is assumed to be the same for all watersheds. Smaller release groups, such as those from the San Juan Islands (SJUA in RMIS) were not included in Shelton et al. because of the low recovery rates – though the ocean distribution of these fish is assumed to be similar to those populations originating from Puget Sound. In particular, ocean distributions of spring run stocks tend to be less well understood than fall stocks. We use the best information available but acknowledge that advances in estimates of ocean distribution of many stocks will improve with the completion of on-going research over the course of the next 1-3 years.

### **Weight and Scoring**

#### FACTOR 1

If the Chinook stock was observed  $\geq 5\%$  of the whales diet in summer or fall/wi/spr, the stock receives 1 point. If it was not observed in the diet, the stock receives 0 points. This prioritizes stocks observed in the diet compared to those that have not been observed.

#### FACTOR 2

Current data indicate that both reduced body condition and a diversified diet occur in non-summer months. If a stock is consumed during October through May, it receives 1 point. If it is consumed during June through September, the stock receives 0 points. This prioritizes stocks that are consumed during periods with a higher likelihood of food limitation or stress in the whales' health.

### FACTOR 3

For each space/time area described above, if more than 25% of the Chinook stock is distributed in that area, the area receives a sub-score of 2. For areas that contain between 5% and 25% of the Chinook stock, the area receives a sub-score of 1. If an area contains less than 5% of the Chinook stock, it receives a sub-score of 0. The sub-scores for each area are multiplied by an importance weight for each area. The final score for the Chinook stock/population is the sum of the products of the scores and weight for each area normalized such that the highest possible score of a given stock is equal to 3.

Here are the seven space/time combinations included in Factor 3 and their associated weights.

1. WA coast in Winter/Spring; weight = 0.5
2. WA coast in Summer/Fall; weight = 0.5
3. Salish Sea in Winter/Spring; weight = 0.5
4. Salish Sea in Summer/Fall; weight = 0.5
5. OR / N.CA coast in Winter/Spring; weight = 0.25
6. CA coast in Winter/Spring ; weight = 0.25
7. West Coast of Vancouver Island in Winter/Spring; weight = 0.5

The Salish Sea and coastal waters off WA have a 0.5 weight. The areas off BC, OR/North CA and CA have a 0.25 weight. This structure means that the areas of highest SRKW use – the Salish Sea and coastal WA – are treated as twice as important as the other areas.

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**Priority Chinook Stocks Using Conceptual Model**

ESU / Stock Group	Run Type	Rivers or Stocks in Group	Diet Contribution Score (0,1)	Killer Whale Reduced Body Condition or Diverse Diet Score (0,1)	Spatio-Temporal Overlap Score (0 - 3)	Total Score (sum of factors)
			Avg. Factor 1 (see note)	Avg. Factor 2 (see note)	Avg. Factor 3	
Northern Puget Sound	Fall	Nooksack, Elwha, Dungeness, Skagit, Stillaguamish, Snohomish	1	1	3.00	5.00
Southern Puget Sound	Fall	Nisqually, Puyallup, Green, Duwamish, Deschutes, Hood Canal systems	1	1	3.00	5.00
Lower Columbia	Fall	Fall Tules and Fall Brights (Cowlitz, Kalama, Clackamas, Lewis, others)	1	1	2.63	4.63
Strait of Georgia	Fall	Lower Strait (Cowichan, Nanaimo), Upper Strait (Klinaklini, Wakeman, others), Fraser (Harrison)	1	1	2.63	4.63
Upper Columbia & Snake Fall	Fall	Upriver Brights	1	1	2.25	4.25
Fraser	Spring	Spring 1.3 (upper Pitt, Birkenhead; Mid & Upper Fraser; North and South Thompson) and Spring 1.2 (Lower Thompson, Louis Creek, Bessette Creek)	1	1	2.25	4.25
Lower Columbia	Spring	Lewis, Cowlitz, Kalama, Big White Salmon	1	1	2.25	4.25
Middle Columbia	Fall	Fall Brights	1	1	2.06	4.06
Snake River	Spring-Summer	Snake, Salmon, Clearwater	1	1	1.88	3.88
Northern Puget Sound	Spring	Nooksack, Elwha, Dungeness, Skagit (Stillaguamish, Snohomish)	1	1	1.88	3.88
Washington Coast	Spring	Hoh, Queets, Quillayute, Grays Harbor	1	1	1.69	3.69
Washington Coast	Fall	Hoh, Queets, Quillayute, Grays Harbor	1	1	1.69	3.69
Central Valley	Spring	Sacramento and tributaries	1	1	1.50	3.50
Middle & Upper Columbia Spring	Spring	Columbia, Yakima, Wenatchee, Methow, Okanagan	1	1	1.31	3.31
Middle & Upper Columbia Summers	Summer		1	1	1.31	3.31

Fraser	Summer	Summer 0.3 (South Thompson & lower Fraser; Shuswap, Adams, Little River, S. Thompson mainstem, Maria Slough in Lower Fraser) and Summer 1.3 (Nechako, Chilko, Quesnel; Clearwater River in North Thompson)	1	0	1.88	2.88
Central Valley	Fall and Late Fall	Sacramento, San Joaquin	1	1	0.75	2.75
Klamath River	Fall	Upper Klamath and Trinity	1	1	0.75	2.75
Klamath River	Spring	Upper Klamath and Trinity	1	1	0.75	2.75
Upper Willamette	Spring	Willamette	0	0	2.25	2.25
Southern Puget Sound	Spring	Nisqually, Puyallup, Green, Duwamish, Deschutes, Hood Canal systems	0	0	1.88	1.88
Central Valley	Winter	Sacramento and tributaries	0	0	1.50	1.50
North & Central Oregon Coast	Fall	Northern (Siuslaw, Nehalem, Siletz) and Central (Coos, Elk, Coquille, Umpqua)	0	0	1.41	1.41
West Coast Vancouver Island	Fall	Robsertson Creek, WCVI Wild	1	0	0.38	1.38
Southern Oregon & Northern California Coastal	Fall	Rogue, Chetco, Smith, lower Klamath	0	0	0.75	0.75
Southern Oregon & Northern California Coastal	Spring	Rogue	0	0	0.75	0.75
California Coastal	Fall	Mad, Eel, Russian	0	0	0.75	0.75
California Coastal	Spring	Mad, Eel, Russian	0	0	0.75	0.75
Southeastern Alaska	Spring	Taku, Situk, Chilkat, Chickamin, Unuk, Alsek, Stikine	0	0	0.00	0.00
Northern BC	Spring	Yakoun, Skeena, Nass	0	0	0.00	0.00
Central BC	mostly Summer	Atnarko, Dean River, Rivers Inlet	0	0	0.00	0.00

Note: Factor 1 and 2 are not literal averages. If a major component of the rivers in the ESU / Stock group had 1 then this was scored a 1. If no major component was scored a 1, this was scored a 0



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**EXECUTIVE ORDER 18-02**

**SOUTHERN RESIDENT KILLER WHALE  
RECOVERY AND TASK FORCE**

**WHEREAS**, Southern Resident Killer Whales (Southern Residents) are an iconic and treasured species in Washington and throughout the Pacific Northwest;

**WHEREAS**, Southern Residents are classified as endangered in Washington and surrounding waters, under the U.S. Endangered Species Act and in Canada under the Species at Risk Act;

**WHEREAS**, the population of Southern Residents has declined, from a high of 98 in 1995, to 76 today, which is the lowest number of Southern Residents in more than three decades. Recent science also indicates that many Southern Residents are in poor condition and are struggling to raise calves;

**WHEREAS**, if Southern Residents were to become extinct, we would suffer an unacceptable loss to our environment, economy, and way of life. We would also lose an essential component of our marine ecosystem and an indicator of the health of our waters;

**WHEREAS**, Southern Residents hold significant cultural value to native tribes and all Washingtonians;

**WHEREAS**, Southern Residents, through the whale watching industry alone, contribute as much as \$60 million to the local economy annually and provide hundreds of jobs to the Puget Sound region;

**WHEREAS**, Southern Residents make their home in Washington's marine waters for a portion of the year, but they are also highly migratory seeking prey along the west coast from Northern California to Southeast Alaska. Therefore, Southern Residents rely on healthy ecosystems and food sources from Washington and throughout the west coast of the United States and Canada;

**WHEREAS**, three primary factors threaten Southern Resident populations: (1) prey availability, (2) legacy and new toxic contaminants, and (3) disturbance from noise and vessel traffic. The health of Southern Residents and Chinook salmon are tightly linked. Recent scientific studies indicate that reduced Chinook salmon runs undermine the potential for the Southern Resident population to successfully reproduce and recover. Both Southern Residents and Chinook salmon populations are adversely impacted by warming oceans and ocean acidification due to climate change. Presence of contaminants and accumulation of pollutants in Washington's waters are

also linked to the decline of Southern Residents. Key sources of contamination in storm water runoff remain to be addressed and the potential for a catastrophic oil spill continues to threaten Southern Residents and the entire ecosystem of Puget Sound. In addition, increased boat and ship traffic has caused greater underwater noise that interferes with Southern Resident critical feeding and communication;

**WHEREAS**, both swift near-term actions and effective long-term actions are necessary to recover these iconic and endangered animals. Essential recovery actions that are described in both United States and Canadian federal plans and federally approved regional plans must be implemented through close coordination with all of our partners including state, local, tribal, and Canadian governmental entities and other private sector partners to be successful;

**NOW THEREFORE, I**, Jay Inslee, Governor of the state of Washington, by virtue of the power vested in me by the Constitution and statutes of the state of Washington do hereby order and direct as follows:

**Implement Immediate Actions to Benefit Southern Resident Killer Whales**

Within existing resources, I ask the following state agencies, in consultation with the appropriate local governments, federal agencies, and tribal governments, to conduct the immediate actions listed below to further the purpose of this Executive Order.

- Washington Department of Fish and Wildlife (WDFW) with review from the Governor’s Salmon Recovery Office (GSRO) and the Puget Sound Partnership (PSP)—By July 31, 2018, identify the highest priority areas and watersheds for Southern Resident prey in order to focus or adjust, as needed, restoration, protection, incentives, hatcheries, harvest levels, and passage policies and programs.
- WDFW and Washington State Parks and Recreation Commission (WSPRC)—By April 30, 2018, develop implementation plans for increased enforcement, outreach and education of vessel regulations as well as enforcement of Chinook fisheries regulations in areas frequented by orcas.
- Washington State Department of Ecology (Ecology)—By April 30, 2018, create a curriculum to improve and increase the number of trainings for vessels in the whale watching industry to become “vessels of opportunity” to assist in the event of an oil spill.
- Washington State Department of Transportation (WSDOT)—By May 31, 2018, develop strategies for quieting state ferries in areas most important to Southern Residents.
- WDFW—By April 30, 2018, review and amend, as needed, 2018 recreational and commercial fishing regulations prioritizing protection of key areas and fish runs for Southern Resident recovery. I will also ask our tribal co-managers, and international and federal fisheries managers to work directly with WDFW and its Commission in developing recommendations for implementing this action.
- WDFW—By April 30, 2018, explore options and develop a proposal to alter fish food used in state hatcheries to limit the amount of Polychlorinated Biphenyls (PCBs) in Southern Resident prey.

- PSP, WDFW, GSRO—By December 15, 2018, demonstrate how Chinook recovery projects benefit Southern Resident recovery, beginning in the 2018 grant round, for the Pacific Coast Salmon Recovery Fund, the Puget Sound Acquisition and Restoration Program, the Estuary and Salmon Restoration program and the Washington Coastal Restoration Initiative.
- PSP, WDFW, GSRO, WSPRC, Washington State Department of Licensing (DOL)—By July 1, 2018, prioritize existing outreach resources to support Southern Resident recovery. Collaborate with the Governor’s Office to develop a public education program and identify needed resources.
- Ecology—By July 31, 2018, develop criteria to prioritize financial assistance beginning in the 2019-21 biennium for storm water projects that benefit Southern Resident recovery.

**Establishment of the Southern Resident Killer Whale Task Force**

A Southern Resident Killer Whale Task Force is hereby created to identify, prioritize, and support the implementation of a longer term action plan needed for the recovery of Southern Residents and necessary to secure a healthy and sustained population for the future. The plan shall include actions needed to make significant progress in addressing all three of the identified threats to Southern Residents. The Task Force should monitor and evaluate the immediate actions undertaken by state agencies and build upon the progress and effectiveness of that work when developing longer term actions. Where available and applicable, the Task Force should build upon existing state, regional and federal plans.

Members of the Task Force will include directors or their senior designees from the Washington Departments of Agriculture, Commerce, Ecology, Health, and Transportation, as well as the Puget Sound Partnership, the Governor’s Office of Indian Affairs, the Recreation and Conservation Office, and the Governor’s Salmon Recovery Office. I also invite the Department of Fish & Wildlife and its Commission, the Department of Natural Resources, and the Washington State Parks and Recreation Commission to participate on the Task Force as members in full.

I will separately invite representatives of appropriate federal, tribal, and local governments, the private sector and the non-profit sector, to participate in the Task Force. I will invite each Washington legislative caucus to appoint a member to participate in the Task Force.

I shall appoint co-chairs and convene the Southern Resident Killer Whale Task Force (Task Force) beginning in April 2018.

The Task Force shall work with all levels of government and other partners to identify needed policies and programs, recommend priority actions to support recovery efforts, highlight budget needs, and recommend any legislation needed to support this Executive Order. The Task Force shall coordinate their work with appropriate representatives of the Government of Canada, the Province of British Columbia, and the states of Oregon, California, Idaho, and Alaska.

The Task Force shall prepare a comprehensive report and recommendations for recovering Southern Residents, with a full draft due by October 1, 2018, and a final report by November 1, 2018. The report should detail ongoing and new actions that will address all of the major threats

to Southern Residents, including prey availability, legacy and ongoing toxic contaminants, and disturbance from noise and vessel traffic. A second report outlining the progress made, lessons learned, and outstanding needs shall be completed by October 1, 2019. With the submission of its second report, the Task Force shall dissolve.

I direct the Puget Sound Partnership and ask the Department of Fish and Wildlife to organize the necessary agency experts and staff to support the work of the Task Force. The Governor's Policy Office and the Office of Financial Management will provide assistance and guidance to the lead agencies as needed to ensure the success of the Task Force.

The Governor's Office will work with both the State Legislature and State Congressional delegation to solicit their early and ongoing advice and guidance.

The Southern Resident Killer Whale Task Force shall conduct its business in an open, transparent manner, and its meetings will be open to the public.

Signed and sealed with the official seal of the state of Washington on this 14th day of March, 2018, at Olympia, Washington.

By:

/s/

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Jay Inslee  
Governor

BY THE GOVERNOR:

/s/

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Secretary of State

RELATIVE SEA LEVEL PROJECTIONS FOR RCP 4.5 FOR THE COASTAL AREA NEAR: 47.3N, 122.5W  
 For more information about these projections go to [www.coastalnetwork.com/wcrp-documents.html](http://www.coastalnetwork.com/wcrp-documents.html)

Table 1: Projected average sea level magnitudes, in feet, for different assessed likelihoods and time periods

19 year period center	Assessed Probability of Exceedance:									
	99	95	90	83	50	17	10	5	1	0.1
2010	0	0	0	0	0.1	0.2	0.2	0.2	0.2	0.3
2020	0	0.1	0.1	0.1	0.2	0.3	0.3	0.4	0.5	0.5
2030	0.1	0.2	0.2	0.2	0.4	0.5	0.5	0.6	0.7	0.8
2040	0.1	0.2	0.3	0.4	0.5	0.7	0.8	0.9	1	1.3
2050	0.2	0.3	0.4	0.5	0.7	1	1.1	1.2	1.4	2
2060	0.2	0.4	0.5	0.6	0.9	1.2	1.4	1.5	1.8	2.8
2070	0.3	0.5	0.7	0.8	1.1	1.5	1.7	1.9	2.4	3.7
2080	0.3	0.6	0.8	0.9	1.4	1.8	2	2.2	3	5
2090	0.3	0.7	0.9	1.1	1.6	2.1	2.4	2.7	3.6	6.2
2100	0.4	0.8	1	1.2	1.8	2.5	2.8	3.1	4.4	7.6
2110	0.4	0.8	1.1	1.3	2	2.8	3.1	3.6	5.1	9
2120	0.4	0.9	1.2	1.4	2.2	3.1	3.5	4.1	6	10.7
2130	0.4	1	1.3	1.5	2.4	3.5	3.9	4.6	6.9	12.6
2140	0.3	0.9	1.3	1.6	2.6	3.8	4.3	5.1	7.8	14.5
2150	0.3	1	1.3	1.7	2.8	4.2	4.8	5.7	8.9	16.9

Table 2: Assessed likelihood (in percentages) of sea level reaching or exceeding a threshold for different sea levels and dates

19 year period center	Average Sea Level Magnitudes in Feet Relative to 1991-2009 Average													
	0	0.5	1	1.5	2	2.5	3	4	5	6	7	8	9	10
2010	96	0	0	0	0	0	0	0	0	0	0	0	0	0
2020	99	0	0	0	0	0	0	0	0	0	0	0	0	0
2030	100	18	0	0	0	0	0	0	0	0	0	0	0	0
2040	100	59	1	0	0	0	0	0	0	0	0	0	0	0
2050	100	83	15	1	0	0	0	0	0	0	0	0	0	0
2060	100	92	41	5	1	0	0	0	0	0	0	0	0	0
2070	100	96	65	19	3	1	0	0	0	0	0	0	0	0
2080	100	97	78	38	10	3	1	0	0	0	0	0	0	0
2090	100	98	86	55	23	7	2	1	0	0	0	0	0	0
2100	100	98	90	68	38	16	6	1	1	0	0	0	0	0
2110	100	99	92	76	51	27	12	3	1	1	0	0	0	0
2120	100	99	94	81	60	37	20	5	2	1	1	0	0	0
2130	100	99	94	84	67	47	29	9	4	2	1	1	0	0
2140	100	98	94	85	72	54	37	14	6	3	1	1	1	0
2150	100	98	95	87	75	60	45	20	8	4	2	1	1	1



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May 15, 2019

Mr. Stephen Wamback, Chair  
City of Tacoma Planning Commission  
Planning Services Division  
Planning and Development Services Department  
747 Market St., Rm 345  
Tacoma, Washington 98402

Dear Chair Wamback and Planning Commissioners:

**Subject: Comments on the Public Review Document Prepared for the Planning Commission Public Hearing on May 15, 2019 – 2019 Exhibit A: Draft SMP Changes.**

Sent via email to: [planning@cityoftacoma.org](mailto:planning@cityoftacoma.org); [elliott.barnett@cityoftacoma.org](mailto:elliott.barnett@cityoftacoma.org)

Thank you for the opportunity to comment on the City of Tacoma Shoreline Master Program 2019 Periodic Review. The Southern resident orcas, or killer whales, are threatened by (1) an inadequate availability of prey, the Chinook salmon, “(2) legacy and new toxic contaminants, and (3) disturbance from noise and vessel traffic.”<sup>1</sup> “Recent scientific studies indicate that reduced Chinook salmon runs undermine the potential for the southern resident population to successfully reproduce and recover.”<sup>2</sup> A 2018 analysis by the National Oceanic and Atmospheric Administration and the State of Washington Department of Fish and Wildlife ranked the fall Chinook stocks that originate in the Puyallup River highest in importance as food sources for the southern resident killer whales.<sup>3</sup> The 2019 Shoreline Master Program Periodic Review is an opportunity to take steps to help recover the southern resident orcas, the Chinook salmon, and the species and habitats on which they depend. We support improving protections for these key species such as improved regulations to manage hard shoreline armoring and improved protections for shoreline vegetation.

Therefore, we strongly support the shoreline master program update. We do have suggestions to improve the update discussed below.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests,

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<sup>1</sup> State of Washington Office of the Governor, Executive Order 18-02 Southern Resident Killer Whale Recovery and Task Force p. 1 (March 14, 2018) last accessed on May 13, 2019 at: [https://www.governor.wa.gov/sites/default/files/execute\\_order/18-02\\_1.pdf](https://www.governor.wa.gov/sites/default/files/execute_order/18-02_1.pdf) and enclosed with Futurewise’s letter to the City of Tacoma Planning Commission dated Feb. 20, 2019.

<sup>2</sup> *Id.*

<sup>3</sup> National Oceanic and Atmospheric Administration and the State of Washington Department of Fish and Wildlife, *Southern Resident Killer Whale Priority Chinook Stocks* p. 6 (June 22, 2018) accessed on Nov. 28, 2018 at: <https://www.documentcloud.org/documents/4615304-SRKW-Priority-Chinook-Stocks.html> and enclosed with Futurewise’s letter to the City of Tacoma Planning Commission dated Feb. 20, 2019.

and water resources. Futurewise has members and supporters throughout Washington State including the City of Tacoma.

## Summary of Recommendations

As is explained in more detail below, we have the following recommendations.

- The Tacoma Shoreline Master Program (TSMP) Update should require site investigations for areas that the Washington State Department of Archeology and Historic Preservation predictive model rates as “survey recommended: moderate risk,” “survey highly advised: high risk,” and “survey highly advised: very high risk.” These areas are likely to have important cultural resources and an early review by a professional can save time and money and reduce adverse impacts to cultural resources. Please see page 3 of this letter for more information.
- The TSMP Update must include regulations to address sea level rise and increased coastal erosion. Sea level rise is occurring now, and it is getting worse. Addressing sea level rise now will protect people and property. Please see page 3 of this letter for more information.
- Science shows that buffers that are transitioning to native vegetation, such as former pastures, can protect critical areas. The buffer policies and regulations should recognize that buffers can transition to native vegetation, so 6.4.3B.2 should not limit buffers to existing native vegetation. Please see page 6 of this letter for more information.
- Buffer averaging, in proposed 6.4.3C.10, should not reduce buffers by more than 25 percent. This is necessary to protect critical areas functions. Please see page 7 of this letter for more information.
- We strongly support integrating the City’s Biodiversity Areas/Corridors standards in the TSMP. This will protect these important habitats. Please see page 7 of this letter for more information.
- We strongly support updating the Geologically Hazardous Area standards, but also recommend improvements. This is necessary to protect people and property from natural hazards. Tacoma has experience landslides that have damaged homes and property owners and residents deserve better protection. Please see page 7 of this letter for more information.
- We support the shoreline erosion hazard development standards for bulkheads. Scientific studies show that bulkheads have adverse impacts where they are construction and regionally. Please see page 12 of this letter for more information.
- We support improving the requirements to maintain and enhance vegetation in shoreline jurisdiction. Scientific studies show that maintaining vegetation is important to protect water quality and fish and wildlife habitats. Please see page 13 of this letter for more information.



## Detailed Recommendations

**Section 2.4.6, Archaeological, Cultural and Historic Resources, should require site investigations for sites that the Washington State Department of Archeology and Historic Preservation predictive model rates as “survey recommended: moderate risk,” “survey highly advised: high risk,” and “survey highly advised: very high risk.” See pages Section II-B – 81 – 84**

Many historical and cultural sites are in shoreline jurisdiction due to the availability of water, food, and transportation routes. Addressing archaeological resources upfront before projects begin can save money. For example, the Jefferson County Public Utility District’s (PUD) contractor building a community septic system at Becket Point in Jefferson County encountered human bones and Native American artifacts.<sup>4</sup> The contractor had to stop construction. An archaeologist was called in and conducted an investigation that allowed the project to be redesigned and to be completed. However, PUD staff “estimated the delays and additional engineering incurred because of the artifacts added about \$90,000 to the project’s cost.”<sup>5</sup> At least some of that money could have been saved by an upfront archeological investigation.

The Washington State Department of Archaeology and Historic Preservation has developed an archaeological predictive model that can predict where archaeological resources are likely to be located and where the department recommends archaeological surveys should be completed before earth disturbing activities and other uses and activities that can damage archaeological sites are undertaken.<sup>6</sup> Many shoreline areas in Tacoma, and Washington State, are rated “survey recommended: moderate risk,” “survey highly advised: high risk,” and “survey highly advised: very high risk.”<sup>7</sup> We recommend that the shoreline master program update, on pages Section II-B – 81 – 84, should require pre-ground disturbance site investigations for sites that the Washington State Department of Archeology and Historic Preservation predictive model rates as “survey recommended: moderate risk,” “survey highly advised: high risk,” and “survey highly advised: very high risk.” The investigation should be carried out in consultation with affected Native American Tribes and Nations.

**Include regulations to address sea level rise and increased coastal erosion in the SMP Update.**

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<sup>4</sup> Jeff Chew, *Jefferson PUD sticks with Beckett Point* Connections p. 8 (Washington Public Utility Districts Association [WPUDA]: Winter 2008) last accessed on Oct. 18, 2018 at: <https://www.yumpu.com/en/document/view/46547248/connections-washington-public-utility-district-association/11>.

<sup>5</sup> *Id.* at p. 9.

<sup>6</sup> Washington State Department of Archaeology and Historic Preservation WISAARD webpage last accessed on May 8, 2019 at: <https://dahp.wa.gov/historic-preservation/find-a-historic-place>. The results of the predictive model are available for Tacoma to use in planning and project reviews from the Washington State Department of Archaeology and Historic Preservation.

<sup>7</sup> *Id.*



The Shoreline Management Act and Shoreline Master Program Guidelines require shoreline master programs to address the flooding that will be caused by sea level rise. RCW 90.58.100(2)(h) requires that shoreline master programs “shall include” “[a]n element that gives consideration to the statewide interest in the prevention and minimization of flood damages ...” WAC 173-26-221(3)(b) provides in part that “[o]ver the long term, the most effective means of flood hazard reduction is to prevent or remove development in flood-prone areas ...” The areas subject to sea level rise are flood prone areas just the same as areas along bays, rivers, or streams that are within the 100-year flood plain. We support the staff recommendation to address sea level rise in the SMP Update.

Sea level rise is a real problem that is happening now. Sea level is rising and floods and erosion are increasing. In 2012 the National Research Council concluded that global sea level had risen by about seven inches in the 20<sup>th</sup> Century.<sup>8</sup> The new report *Projected Sea Level Rise for Washington State – A 2018 Assessment* projects that for a low greenhouse gas emission scenario there is a 50 percent probability that sea level rise will reach or exceed 1.8 feet by 2100 for much of Tacoma’s marine shorelines.<sup>9</sup> *Projected Sea Level Rise for Washington State – A 2018 Assessment* projects that for a higher emission scenario there is a 50 percent probability that sea level rise will reach or exceed 2.3 feet by 2100 for much of Tacoma’s marine shorelines.<sup>10</sup> Projections are available for all of the marine shorelines in Washington State. The general extent of the projected sea level rise currently projected for coastal waters can be seen on the NOAA Office for Coastal Management Digitalcoast Sea Level Rise Viewer available at: <https://coast.noaa.gov/digitalcoast/tools/slr.html>

Projected sea level rise will substantially increase flooding. As Ecology writes, “[s]ea level rise and storm surge[s] will increase the frequency and severity of flooding, erosion, and seawater intrusion—thus increasing risks to vulnerable communities, infrastructure, and coastal ecosystems.”<sup>11</sup> Not only our marine shorelines will be impacted, as Ecology writes “[m]ore frequent extreme storms are likely to cause river and coastal flooding, leading to increased injuries and loss of life.”<sup>12</sup>

A peer-reviewed scientific study ranked Washington State 14<sup>th</sup> in terms of the number of people living on land less than one meter above local Mean High Water compared to the 23 contiguous

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<sup>8</sup> National Research Council, *Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future* p. 23, p. 156, p. 96, p. 102 (2012) accessed on Feb. 19, 2019 at: <https://www.nap.edu/download/13389>.

<sup>9</sup> *Relative Sea Level Projections for RCP 4.5 for the Coastal Area Near: 47.3N, 122.5W* accessed on May 13, 2019 at: <http://www.wacoastalnetwork.com/wcrp-documents.html> and enclosed with the paper original of Futurewise’s letter to the City of Tacoma Planning Commission dated Feb. 20, 2019. The methodology used for these projections is available in Miller, I.M., Morgan, H., Mauger, G., Newton, T., Weldon, R., Schmidt, D., Welch, M., Grossman, E., *Projected Sea Level Rise for Washington State – A 2018 Assessment* (A collaboration of Washington Sea Grant, University of Washington Climate Impacts Group, Oregon State University, University of Washington, and US Geological Survey. Prepared for the Washington Coastal Resilience Project: 2018) available at the prior webpage and enclosed with the paper original Futurewise’s letter to the City of Tacoma Planning Commission dated Feb. 20, 2019.

<sup>10</sup> *Relative Sea Level Projections for RCP 8.5 for the Coastal Area Near: 47.3N, 122.5W* accessed on May 13, 2019, 2019 at: <http://www.wacoastalnetwork.com/wcrp-documents.html> and enclosed with the paper original of Futurewise’s letter to the City of Tacoma Planning Commission dated Feb. 20, 2019.

<sup>11</sup> State of Washington Department of Ecology, *Preparing for a Changing Climate Washington State’s Integrated Climate Response Strategy* p. 90 (Publication No. 12-01-004: April 2012) accessed on May 13, 2019 at:

<https://fortress.wa.gov/ecy/publications/summarypages/1201004.html> and enclosed with the paper original of Futurewise’s letter to the City of Tacoma Planning Commission dated Feb. 20, 2019.

<sup>12</sup> *Id.* at p. 17.

coastal states and the District of Columbia.<sup>13</sup> This amounted to an estimated minimum of 18,269 people in 2010.<sup>14</sup> Zillow recently estimated that 31,235 homes in Washington State may be underwater by 2100, 1.32 percent of the state's total housing stock. The value of the submerged homes is an estimated \$13.7 billion.<sup>15</sup> Zillow wrote:

It's important to note that 2100 is a long way off, and it's certainly possible that communities [may] take steps to mitigate these risks. Then again, given the enduring popularity of living near the sea despite its many dangers and drawbacks, it may be that even more homes will be located closer to the water in a century's time, and these estimates could turn out to be very conservative. Either way, left unchecked, it is clear the threats posed by climate change and rising sea levels have the potential to destroy housing values on an enormous scale.<sup>16</sup>

Sea level rise will have an impact beyond rising seas, floods, and storm surges. The National Research Council wrote that:

Rising sea levels and increasing wave heights will exacerbate coastal erosion and shoreline retreat in all geomorphic environments along the west coast. Projections of future cliff and bluff retreat are limited by sparse data in Oregon and Washington and by a high degree of geomorphic variability along the coast. Projections using only historic rates of cliff erosion predict 10–30 meters [33 to 98 feet] or more of retreat along the west coast by 2100. An increase in the rate of sea-level rise combined with larger waves could significantly increase these rates. Future retreat of beaches will depend on the rate of sea-level rise and, to a lesser extent, the amount of sediment input and loss.<sup>17</sup>

A recent paper estimated that “[a]nalysis with a simple bluff erosion model suggests that predicted rates of sea-level rise have the potential to increase bluff erosion rates by up to 0.1 m/yr [meter a year] by the year 2050.”<sup>18</sup> This translates to four additional inches of bluff erosion a year.

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<sup>13</sup> Benjamin H. Strauss, Remik Ziemiński, Jeremy L. Weiss, and Jonathan T. Overpeck, *Tidally adjusted estimates of topographic vulnerability to sea level rise and flooding for the contiguous United States* 7 ENVIRON. RES. LETT. 014033, 4 (2012) accessed on May 13, 2019 at: <http://iopscience.iop.org/1748-9326/7/1/014033/article> This journal is peer reviewed. Environmental Research Letters “Submission requirements” webpage accessed on May 13, 2019 at: <http://iopscience.iop.org/1748-9326/page/Submission%20requirements>.

<sup>14</sup> *Id.*

<sup>15</sup> Krishna Rao, *Climate Change and Housing: Will a Rising Tide Sink all Homes?* ZILLOW webpage (8/2/2016) last accessed on May 13, 2019 at: <http://www.zillow.com/research/climate-change-underwater-homes-12890/>.

<sup>16</sup> *Id.*

<sup>17</sup> National Research Council, *Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future* p. 135 (2012).

<sup>18</sup> George M. Kaminsky, Heather M. Baron, Amanda Hacking, Diana McCandless, David S. Parks, *Mapping and Monitoring Bluff Erosion with Boat-based LIDAR and the Development of a Sediment Budget and Erosion Model for the Elwha and Dungeness Littoral Cells, Clallam County, Washington* p. 3 last accessed on May 13, 2019 at: [http://www.coastalwatershedinstitute.org/Final%20Report\\_Clallam%20County%20Bluffs%202014\\_Final%20revised.pdf](http://www.coastalwatershedinstitute.org/Final%20Report_Clallam%20County%20Bluffs%202014_Final%20revised.pdf).

A recent peer-reviewed article estimated that up to 8,017 people in Pierce County will be at risk of adverse impacts from sea level rise in 2100.<sup>19</sup> The time to adopt protective measures is now.

Homes built today are likely to be in use 2100. And new lots created today will be in use in 2100. This is why the Washington State Department of Ecology recommends “[l]imiting new development in highly vulnerable areas.”<sup>20</sup>

We appreciate the sea level rise policies on pages Section II-B – 117 and 18 and page Section II-B – 123, but we believe that the threat presented by sea level rise requires regulations. Therefore, we recommend the following new regulations be added to the SMP update on page Section II-B – 120.

16. New lots shall be designed and located so that the buildable area is outside the area likely to be inundated by sea level rise in 2100 and outside of the area in which wetlands and aquatic vegetation will likely migrate during that time.
17. Where lots are large enough, new structures and buildings shall be located so that they are outside the area likely to be inundated by sea level rise in 2100 and outside of the area in which wetlands and aquatic vegetation will likely migrate during that time.
18. New and substantially improved structures shall be elevated above the likely sea level rise elevation in 2100 or for the life of the building, whichever is less.

**The buffer policies and regulations should recognize that buffers can transition to native vegetation, so 6.4.3B.2 should not limit buffers to existing native vegetation. See page Section II-B – 130.**

While native vegetation certainly provides important buffer functions, other buffers can also protect critical areas. The State of Washington Department of Ecology defines “ecologically significant buffers” to include “old fields undergoing succession.”<sup>21</sup> This is common type of buffer in many areas. We recommend that the proposed amendments to 6.4.3B.2 recognize that buffers can transition to native vegetation over time. Buffers are also reserved to protect critical areas and so 6.4.3B.2 should reflect that function. These changes are consistent with the proposed definition of buffer on page Section II-B – 279. We recommend that 6.4.3B.2 be modified to read as follows with

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<sup>19</sup> Mathew E. Hauer, Jason M. Evans, and Deepak R. Mishra, *Millions projected to be at risk from sea-level rise in the continental United States* NATURE CLIMATE CHANGE Letters Advance Online Publication p. 3 (Published Online: 14 March 2016 | DOI: 10.1038/NCLIMATE2961). Nature Climate Change is a peer-reviewed science journal. See the Author Instructions accessed on May 13, 2019 at: [http://mts-nclim.nature.com/cgi-bin/main.plex?form\\_type=display\\_auth\\_instructions](http://mts-nclim.nature.com/cgi-bin/main.plex?form_type=display_auth_instructions).

<sup>20</sup> State of Washington Department of Ecology, *Preparing for a Changing Climate Washington State's Integrated Climate Response Strategy* p. 90 (Publication No. 12-01-004: April 2012).

<sup>21</sup> Thomas Hruby, Donna Buntun, Amy Yahnke and Jerry Franklin, *Characterizing Wetland Buffers in Washington State* p. 7 (State of Washington Department of Ecology Publication No. 17-06-008 Sept. 2017) accessed on May 8, 2019 at: <https://fortress.wa.gov/ecy/publications/SummaryPages/1706008.html> and enclosed in a separate email.

our additions double underlined and our deletions double struck through, the city proposed amendments are shown with single line underling and single line strike throughs.

2. Buffers shall consist of an ~~undisturbed~~ area reserved for the protection of existing critical areas and of native vegetation or areas reserved for priority uses (water-dependent uses and public access), including restoration established to protect the integrity, functions and processes of the shoreline. Required buffer widths shall reflect the sensitivity of the shoreline functions and the type and intensity of human activity proposed to be conducted nearby.

### **Buffer averaging, in proposed 6.4.3C.10 should not reduce buffers by more than 25 percent. See page Section II-B – 132.**

Buffer averaging is a way of fitting square buildings on a round earth.<sup>22</sup> Generally there is no scientific justification for buffer averaging. Buffering can increase the protection for critical areas if a critical area includes an important feature that would benefit from additional buffering such as a nest tree on the outer edge of a wetland buffer. However, the buffer averaging provisions do not propose to limit buffer averaging to these circumstances.

The proposed buffer averaging provisions remove the limitation on reducing buffers widths by more than 25 percent in any part of the buffer. The Washington State Department of Ecology recommends that buffer averaging reductions not exceed 25 percent of the required buffer width; that is the buffer is at least 75 percent of its required width in all areas.<sup>23</sup> We recommend that buffer reductions due to buffer averaging be limited to no more than 25 percent to protect the functions of marine habitats. This is especially important given the perilous state of the Chinook salmon and the southern resident killer whales documented above.

### **We strongly support integrating the City's Biodiversity Areas/Corridors standards in the TSMP. See pages Section II-B – 134 – 40**

We support integrating the Tacoma Biodiversity Areas and Corridors standards into the shoreline master program update. This will improve protections for important fish and wildlife habitats.

### **We strongly support Updating the Geologically Hazardous Area standards, but also recommend improvements**

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<sup>22</sup> T. Granger, T. Hruby, A. McMillan, D. Peters, J. Rubey, D. Sheldon, S. Stanley, E. Stockdale, *Wetlands in Washington State - Volume 2: Guidance for Protecting and Managing Wetlands* p. 8-41 (Washington State Department of Ecology, Olympia, WA: April 2005, Publication #05-06-008) accessed on May 13, 2019 at: <https://fortress.wa.gov/ecy/publications/summarypages/0506008.html>.

<sup>23</sup> T. Granger, T. Hruby, A. McMillan, D. Peters, J. Rubey, D. Sheldon, S. Stanley, E. Stockdale, *Wetlands in Washington State - Volume 2: Guidance for Protecting and Managing Wetlands*. (Washington State Department of Ecology, Olympia, WA: April 2005, Publication #05-06-008) Appendix 8-C Guidance on Widths of Buffers and Ratios for Compensatory Mitigation for Use with the Western Washington Wetland Rating System p. 14 (July 2018) enclosed in a separate email.

Tacoma, like many other cities along Puget Sound is susceptible to landslides. The 1949 Tacoma Narrows Landslide, in Tacoma “failed catastrophically along steep” 300 feet high bluffs overlooking Puget Sound.<sup>24</sup> The landslide ran out 500 yards, 1,500 feet, into Puget Sound.<sup>25</sup> Tacoma has also suffered from other landslides along its shorelines such as at Salmon Beach where homes were lost.<sup>26</sup>

The Shoreline Master Program (SMP) Guidelines, in WAC 173-26-221(2)(c)(ii)(B), provide: “Do not allow new development or the creation of new lots that would cause foreseeable risk from geological conditions to people or improvements during the life of the development.” Landslides are a type of geological hazards that can result in major impacts to people and property.

Four homes have been ruined at Salmon Beach in Tacoma between 1996 and 2001.<sup>27</sup> The March 22, 2014, Oso landslide “claimed the lives of 43 people, making it the deadliest landslide event in United States history. Of the approximately 10 individuals who were struck by the landslide and survived, several sustained serious injuries.”<sup>28</sup> So properly designating geologically hazardous areas and protecting people from geological hazards is very important.

It is important to understand that homeowner’s insurance does not cover the damage from landslides. “Insurance coverage for landslides is uncommon. It is almost never a standard coverage, and is difficult to purchase inexpensively as a policy endorsement.”<sup>29</sup>

None of the Oso victims’ homes were covered by insurance for landslide hazards.<sup>30</sup> And that is common when homes are damaged by landslides.<sup>31</sup> For example, on March 14, 2011, a landslide

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<sup>24</sup> Alan F. Chleborad, *Modeling and Analysis of the 1949 Narrows Landslide, Tacoma, Washington* xxxi ENVIRONMENTAL AND ENGINEERING GEOSCIENCE 305 p. 305 (1994) accessed on May 13 2019 at: <https://pubs.geoscienceworld.org/aeg/eeg/article-abstract/xxxi/3/305/137520/modeling-and-analysis-of-the-1949-narrows?redirectedFrom=fulltext> and the webpage and page 305 is enclosed with Futurewise’s letter to the City of Tacoma Planning Commission dated Feb. 20, 2019.

<sup>25</sup> *Id.*

<sup>26</sup> Hugh Shipman, *Coastal Landsliding on Puget Sound: A review of landslides occurring between 1996 and 1999* p. 64 (Washington Department of Ecology Report #01-06-019: Aug. 2001) accessed on May 13, 2019 at: <https://fortress.wa.gov/ecy/publications/documents/0106019.pdf>; Rebecca Trounson, *Tranquility’s Risk Delivers a Loss Los Angeles Times* pp. 1 – 2/3 (March 02, 2001) accessed on May 13, 2019 at: <http://articles.latimes.com/2001/mar/02/news/mn-32288> and enclosed in a separate email.

<sup>27</sup> Rebecca Trounson, *Tranquility’s Risk Delivers a Loss Los Angeles Times* pp. 1 – 2/3 (March 02, 2001).

<sup>28</sup> Jeffrey R. Keaton, Joseph Wartman, Scott Anderson, Jean Benoit, John deLaChapelle, Robert Gilbert, David R. Montgomery, *The 22 March 2014 Oso Landslide, Snohomish County, Washington* p. 1 (Geotechnical Extreme Events Reconnaissance (GEER): July 22, 2014) accessed on May 13, 2019 at: [http://www.geerassociation.org/index.php/component/geer\\_reports/?view=geerreports&layout=build&id=30](http://www.geerassociation.org/index.php/component/geer_reports/?view=geerreports&layout=build&id=30). If the American territories are included, then the Oso landslide is the second deadliest landslide in American history. R.M. Iverson, D.L. George, K. Allstadt, *Landslide mobility and hazards: implications of the Oso disaster* 412 EARTH AND PLANETARY SCIENCE LETTERS 197, 198 (2015).

<sup>29</sup> Robert L. Schuster & Lynn M. Highland, *The Third Hans Cloos Lecture: Urban landslides: socioeconomic impacts and overview of mitigative strategies* 66 BULLETIN OF ENGINEERING GEOLOGY AND THE ENVIRONMENT 1, p. 22 (2007) accessed on May 13, 2019 at: [ftp://193.134.202.10/pub/TRAMM/Workshop\\_EWS/Literature/Schuster\\_and\\_Highland\\_2007\\_Bulletin\\_of\\_Engineering\\_Geology\\_and\\_the\\_Environment.pdf](ftp://193.134.202.10/pub/TRAMM/Workshop_EWS/Literature/Schuster_and_Highland_2007_Bulletin_of_Engineering_Geology_and_the_Environment.pdf)

<sup>30</sup> Sanjay Bhatt, *Slide erased their homes, but maybe not their loans The Seattle Times* (April 2, 2014) accessed on May 13, 2019 at: [http://old.seattletimes.com/html/latestnews/2023278858\\_mudslidefinancialxml.html](http://old.seattletimes.com/html/latestnews/2023278858_mudslidefinancialxml.html).

<sup>31</sup> *Id.*

damaged the home of Rich and Pat Lord.<sup>32</sup> This damage required the homeowners to abandon their home on Norma Beach Road near Edmonds, Washington. Because their homeowner's insurance did not cover landslides, they lost their home.<sup>33</sup> This loss of what may be a family's largest financial asset is common when homes are damaged or destroyed by landslides or other geological hazards.

Landslide buyouts are rare and when they occur the property owner often only recovers pennies on the dollar. The property owners bought out after the Aldercrest-Banyon landslide in Kelso, Washington destroyed their homes received 30 cents on the dollar.<sup>34</sup> This underlines why preventing development in geologically hazardous areas is just plain ordinary consumer protection.

We strongly support designating the landslide deposits, scarps and flanks, and areas with susceptibility to deep and shallow landslides identified by the State of Washington Department of Natural Resources as geologically hazardous area. See pages Section II-B – 154 – 56

The State of Washington Department of Natural Resources is preparing detailed landslide inventories which are then used to prepare landslide susceptibility maps throughout Washington State.<sup>35</sup> The Pierce County Landslide Inventory was the first countywide inventory prepared using the Department of Natural Resources' landslide inventory mapping protocol.<sup>36</sup> The "[s]usceptibility maps aid in estimating the potential for future landslides."<sup>37</sup>

These maps, actually geographical information system (GIS) data layers, are science-based inventories available for all of Tacoma. Futurewise strongly supports designating the landslide deposits, scarps and flanks, and areas with susceptibility to deep and shallow landslides identified by the State of Washington Department of Natural Resources in the Pierce County Landslide Inventory as geologically hazardous areas. This will better protect people and property.

Landslides are capable of damaging commercial, residential, or industrial development at both the tops and toes slopes due to the earth sliding and other geological events.<sup>38</sup> So the areas at the top, toe, and sides of the slope are geological hazards. We recommend these areas be designated as landslide hazards.

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<sup>32</sup> Ian Terry, *Abandoned and trashed after mudslide, Edmonds house now for sale* The Herald (Feb. 11, 2015). The house is for sale after the bank who held the Lord's mortgage took ownership of the home. *Id.* accessed on May 13, 2019 at: <http://www.heraldnet.com/article/20150211/NEWS01/150219829>.

<sup>33</sup> *Id.* at p. \*6.

<sup>34</sup> Isabelle Sarikhan, *Sliding Thought Blog, Washington's Landslide Blog* Landslide of the Week – Aldercrest Banyon Landslide July 29, 2009 accessed on May 13, 2019 at: <https://slidingthought.wordpress.com/2009/07/29/landslide-of-the-week-aldercrest-banyon-landslide/>

<sup>35</sup> Katherine A. Mickelson and Stephen L. Slaughter, *Washington State's New Landslide Inventory Mapping Protocol* (Washington Department of Natural Resources, Washington Geological Survey, Geological Society of America Annual Meeting in Seattle, Washington, USA, Session 252:T244. Landslide Inventories, Databases, Hazard Maps, Risk Analysis, and Beyond (Posters), Paper No. 252-5: Oct. 24, 2017) accessed on May 13, 2019 at: [https://www.dnr.wa.gov/publications/ger\\_presentations\\_gsa\\_2017\\_mickelson.pdf](https://www.dnr.wa.gov/publications/ger_presentations_gsa_2017_mickelson.pdf).

<sup>36</sup> *Id.*

<sup>37</sup> *Id.*

<sup>38</sup> Jeffrey R. Keaton, Joseph Wartman, Scott Anderson, Jean Benoît, John deLaChapelle, Robert Gilbert, David R. Montgomery, *The 22 March 2014 Oso Landslide, Snohomish County, Washington* p. 1 & p. 68 (Geotechnical Extreme Events Reconnaissance (GEER): July 22, 2014).

Please revise the last sentence in proposed 6.4.7(2)(k)(i)(3) on page Section II-B – 155

The last sentence seems to either have more words than needed or is missing words. Please revise the last sentence to correct this minor typographical error.

Require the review of geologically hazardous areas capable of harming buildings or occupants on a development site

We recommend that the regulations require review of any landslide capable of damaging the proposed development. Geological hazards, such as landslides are capable of damaging property outside the hazard itself. The 1949 Tacoma Narrows Landslide ran out 1,500 feet into Puget Sound.<sup>39</sup> The 2014 Oso slide ran out for over a mile (5,500 feet) even though the slope height was 600 feet.<sup>40</sup> A 2006 landslide at Oso traveled over 300 feet.<sup>41</sup> Recent research shows that long runout landslides are more common than had been realized.<sup>42</sup> This research documents that over the past 2000 years, the average landslide frequency of long runout landslides in the area near the Oso landslide is one landslide every 140 years.<sup>43</sup> The landslides ran out from 787 feet to the 2,000 feet of the 2014 landslide.<sup>44</sup> So we recommend that Tacoma require review of all geological hazards capable of harming a proposed lot or building site.

Do not limit landslide buffers to 50 feet or one third of the height of the slope for the top of slope buffer or half the height of the slope for the bottom of slope buffer. See page Section II-B – 157

Landslides in Tacoma and Western Washington are capable of running out significant distances. The 1949 Tacoma Narrows Landslide, in Tacoma “failed catastrophically along steep” 300 feet high

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<sup>39</sup> Alan F. Chleborad, *Modeling and Analysis of the 1949 Narrows Landslide, Tacoma, Washington* xxxi ENVIRONMENTAL AND ENGINEERING GEOSCIENCE 305 p. 305 (1994).

<sup>40</sup> Jeffrey R. Keaton, Joseph Wartman, Scott Anderson, Jean Benoît, John deLaChapelle, Robert Gilbert, David R. Montgomery, *The 22 March 2014 Oso Landslide, Snohomish County, Washington* p. 56 & p. 144 (Geotechnical Extreme Events Reconnaissance (GEER): July 22, 2014).

<sup>41</sup> *Id.* at p. 1.

<sup>42</sup> Sean R. LaHusen, Alison R. Duvall, Adam M. Booth, and David R. Montgomery, *Surface roughness dating of long-runout landslides near Oso, Washington (USA), reveals persistent postglacial hillslope instability* GEOLOGY pp. \*2 – 3, published online on 22 December 2015 as doi:10.1130/G37267.1; Geological Society of America (GSA) Data Repository 2016029, *Data repository for: Surface roughness dating of long-runout landslides near Oso, WA reveals persistent postglacial hillslope instability* p. 4 both enclosed with Futurewise’s letter to the City of Tacoma Planning Commission dated Feb. 20, 2019. Geology is a peer-reviewed scientific journal. Geology – Prep webpage accessed on Jan. 23, 2018 at:

<http://www.geosociety.org/GSA/Publications/Journals/Geology/GSA/Pubs/geology/home.aspx#overview> and enclosed with and enclosed with Futurewise’s letter to the City of Tacoma Planning Commission dated Feb. 20, 2019.

<sup>43</sup> Sean R. LaHusen, Alison R. Duvall, Adam M. Booth, and David R. Montgomery, *Surface roughness dating of long-runout landslides near Oso, Washington (USA), reveals persistent postglacial hillslope instability* GEOLOGY p. \*2, published online on 22 December 2015 as doi:10.1130/G37267.1.

<sup>44</sup> Geological Society of America (GSA) Data Repository 2016029, *Data repository for: Surface roughness dating of long-runout landslides near Oso, WA reveals persistent postglacial hillslope instability* p. 4.

bluffs and ran out 1,500 feet into Puget Sound.<sup>45</sup> This is five times the buff height. The 2014 Oso slide ran out for over a mile (5,500 feet) even through the slope height was 600 feet.<sup>46</sup> This was nine times the slope height. The 2013 Ledgewood-Bonair Landslide on Whidbey Island extended approximately 300 feet into Puget Sound.<sup>47</sup> In a study of shallow landslides along Puget Sound from Seattle to Everett, the average runout length was 197.5 feet (60.2 m) and the maximum runout length was 771 feet (235 m).<sup>48</sup> So limiting landslide buffers to 50 feet or one third of the height of the slope for the top of slope buffer or half the height of the slope for the bottom of slope buffer will not adequately protect people and property.

The Joint SR 530 Landslide Commission recommends identifying “[c]ritical area buffer widths based on site specific geotechnical studies” as an “innovative development regulation[]” that counties and cities should adopt.<sup>49</sup> So we support the part of the landslide buffer recommendation that is based on the minimum distance recommended by the geotechnical professional.<sup>50</sup> Construction should not be allowed in these areas.

Define seismic hazard areas to include areas subject to liquefaction and areas with geology likely to amplify ground shaking. See page Section II-B – 156

We recommend that seismic hazard areas be defined to include areas subject to liquefaction and areas with geology that is likely to amplify ground shaking. In 2004, the Washington State Department of Natural Resources completed a set of liquefaction maps and maps identifying where the geology is likely to amplify ground shaking, referred to as “Site Class” maps.<sup>51</sup> These maps represent best available science on the occurrence of these hazards.

Adopting these maps and protective provisions for these areas will protect people and property from hazards resulting from earthquakes. Liquefaction occurs when earthquake shaking causes soils

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<sup>45</sup> Alan F. Chleborad, *Modeling and Analysis of the 1949 Narrows Landslide, Tacoma, Washington* xxxi ENVIRONMENTAL AND ENGINEERING GEOSCIENCE 305 p. 305 (1994).

<sup>46</sup> Jeffrey R. Keaton, Joseph Wartman, Scott Anderson, Jean Benoît, John deLaChapelle, Robert Gilbert, David R. Montgomery, *The 22 March 2014 Oso Landslide, Snohomish County, Washington* p. 56 & p. 144 (Geotechnical Extreme Events Reconnaissance (GEER): July 22, 2014).

<sup>47</sup> Stephen Slaughter, Isabelle Sarikhan, Michael Polenz, and Tim Walsh, *Quick Report for the Ledgewood-Bonair Landslide, Whidbey Island, Island County, Washington* pp. 3 – 4 (Washington State Department of Natural Resources, Division of Geology and Earth Resources: March 28, 2013) accessed on May 13, 2019 at:

[http://www.dnr.wa.gov/publications/ger\\_qr\\_whidbey\\_island\\_landslide\\_2013.pdf](http://www.dnr.wa.gov/publications/ger_qr_whidbey_island_landslide_2013.pdf) and enclosed with the paper original of Futurewise’s letter to the City of Tacoma Planning Commission dated Feb. 20, 2019.

<sup>48</sup> Edwin L. Harp, John A. Michael, and William T. Laprade, *Shallow-Landslide Hazard Map of Seattle, Washington* p. 17 (U.S. Geological Survey Open-File Report 2006–1139: 2006) accessed on May 13, 2019 at:

<http://pubs.usgs.gov/of/2006/1139/> and enclosed with the paper original of Futurewise’s letter to the City of Tacoma Planning Commission dated Feb. 20, 2019.

<sup>49</sup> The SR 530 Landslide Commission, *Final Report* p. 31 (Dec. 15, 2014) accessed on May 13, 2019 at:

[http://www.governor.wa.gov/sites/default/files/documents/SR530LC\\_Final\\_Report.pdf](http://www.governor.wa.gov/sites/default/files/documents/SR530LC_Final_Report.pdf) and enclosed with the paper original of Futurewise’s letter to the City of Tacoma Planning Commission dated Feb. 20, 2019.

<sup>50</sup> City of Tacoma Shoreline Master program (SMP) Periodic Review Best Available Science Review and Gap Analysis Matrix – Geologically Hazardous Areas Prepared by Robison-Noble p. 11 of 13 (Feb. 2019).

<sup>51</sup> The maps are available at the Geologic Information Portal accessed on May 13, 2019 at:

<http://www.dnr.wa.gov/geologyportal> or <ftp://ww4.dnr.wa.gov/geology/pubs/ofr04-20/>

to rapidly lose their strength and behave like quicksand. The soils most likely to liquefy are artificial fills and areas of loose sandy soils saturated with water. The movement of liquefied soils can rupture pipelines, move bridge abutments and roads, and damage buildings. Liquefaction has damaged many buildings during earthquakes including Alaska's Good Friday earthquake, California's Loma Prieta earthquake, and the Kobe, Japan earthquake.<sup>52</sup> We recommend that areas classified as having a liquefaction susceptibility of "moderate," "moderate to high," "high," and "peat deposit" be identified as geological hazards.

The Site Class Map identifies areas where the underlying geology is likely to amplify shaking on the ground surface. This is the most damaging effect of an earthquake. So, buildings constructed on areas more susceptible to strong shaking area are more likely to be damaged or destroyed in an earthquake.<sup>53</sup> By identifying these areas and engineering and constructing buildings to withstand this shaking, people and property will be better protected from earthquake damage. We recommend that areas classified as having a site class of "D to E," "E," and "F" be designated as geological hazards.

Development regulations requiring review of structures proposed for these areas should be adopted to ensure they can withstand the hazards of locating on these soils with their amplified earthquake movement.

### **We support the Shoreline Erosion Hazard Development Standards for bulkheads. See pages Section II-B – 162 – 63**

We support the Shoreline Erosion Hazard Development Standards. Bulkheads and other forms of hard shoreline armoring cause significant adverse impacts to the environment of Puget Sound.<sup>54</sup> They should be allowed only when they are needed.

### **Amend the hard-armoring requirements in TSMP 6.4.7F.9 should cross-reference the requirements in TMSP 8.2.2.**

Recent studies of hard shoreline armoring show that it has adverse impacts on Puget Sound at both the local and regional scales.<sup>55</sup> Scientists from the University of Washington and other organizations

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<sup>52</sup> Stephen P. Palmer, Sammantha L. Magsino, Eric L. Bilderback, James L. Poelstra, Derek S. Folger, and Rebecca A. Niggemann, *Liquefaction Susceptibility and Site Class Maps of Washington State, By County* p. 1 (Washington Division of Geology and Earth Resources, Open File Report 2004-20: Sept. 2004) accessed on May 13, 2019 at: [ftp://ww4.dnr.wa.gov/geology/pubs/ofr04-20/ofr2004-20\\_report.pdf](ftp://ww4.dnr.wa.gov/geology/pubs/ofr04-20/ofr2004-20_report.pdf).

<sup>53</sup> *Id.* at pp. 2 – 3.

<sup>54</sup> Megan N. Dethier, Wendel W. Raymond, Aundrea N. McBride, Jason D. Toft, Jeffery R. Cordell, Andrea S. Ogston, Sarah M. Heerhartz, Helen D. Berry, *Multiscale impacts of armoring on Salish Sea shorelines: Evidence for cumulative and threshold effects* 175 *Estuarine, Coastal and Shelf Science* 106 pp. 114 – 16 (2016) enclosed with the paper original of Futurewise's letter to the City of Tacoma Planning Commission dated Feb. 20, 2019. *Estuarine, Coastal and Shelf Science* is a peer-reviewed scientific journal. *Estuarine, Coastal and Shelf Science Author Information Pack* pp. 9 – 11 (20 Feb 2019) accessed on May 13, 2019 at: <https://www.journals.elsevier.com/estuarine-coastal-and-shelf-science> and enclosed with the paper original of Futurewise's letter to the City of Tacoma Planning Commission dated Feb. 20, 2019.

<sup>55</sup> Megan N. Dethier, Wendel W. Raymond, Aundrea N. McBride, Jason D. Toft, Jeffery R. Cordell, Andrea S. Ogston, Sarah M. Heerhartz, Helen D. Berry, *Multiscale impacts of armoring on Salish Sea shorelines: Evidence for cumulative and threshold effects* 175 *ESTUARINE, COASTAL AND SHELF SCIENCE* 106 p. 106 (2016).

“found that armoring was consistently associated with reductions in beach width, riparian vegetation, numbers of accumulated logs, and amounts and types of beach wrack and associated invertebrates.”<sup>56</sup> “At large spatial and temporal scales, armoring much of a sediment drift cell may result in reduction of the finer grain-size fractions on beaches, including those used by spawning forage fish.”<sup>57</sup> Forage fish are a “critical prey species” for salmon.<sup>58</sup> Forage fish spawning areas are located in Tacoma.<sup>59</sup> So it is important to carefully manage hard shoreline armoring.

TMSP 8.2.2 includes a comprehensive set of regulations applicable to hard structural stabilization. We recommend that TSMP 6.4.7F.9 cross-reference those requirements.

**We support improving the requirements to maintain and enhance vegetation in shoreline jurisdiction. See pages Section II-B – 186 – 87**

The report *Protecting Nearshore Habitat and Functions in Puget Sound* documents marine riparian vegetation is important to maintaining the health of Puget Sound.

Riparian vegetation contributes to the foodweb by providing large woody debris and organic matter, important to many species, and creates habitat for insects and marine invertebrates that are important food sources for fish and other aquatic life. Vegetation in tidal plains provides refuge for juvenile salmon and shades shallow water to maintain cooler temperatures that are necessary for the survival of salmon and other species. Large trees, which shade the upper intertidal zone is especially important for maintaining forage fish spawning habitat.

Marine riparian vegetation also protects water quality and reduces surface erosion by slowing run off. Terrestrial and shoreline vegetation acts as a filter for runoff, while submerged vegetation causes sediments to settle out of the water column. By slowing erosion and retaining sediments, riparian vegetation reduces pollutants including nitrogen, phosphorus, hydrocarbons, PCBs, metals, and pesticides. It also prevents excessive turbidity, which can smother eggs and aquatic vegetation.<sup>60</sup>

Removing or disturbing this native vegetation results in reduced ecological functions as does decreasing the width of the vegetated riparian area, reducing plant density, and reducing plant diversity.<sup>61</sup> So maintaining vegetation in shoreline jurisdiction is important to conserving and

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<sup>56</sup> *Id.*

<sup>57</sup> *Id.*

<sup>58</sup> Dan Penttila, Marine Forage Fishes in Puget Sound p. v (Puget Sound Nearshore Partnership Report No. 2007-03, published by Seattle District, U.S. Army Corps of Engineers, Seattle, Washington: 2007) and accessed on May 9, 2019 at: [http://www.pugetsoundnearshore.org/technical\\_papers/marine\\_fish.pdf](http://www.pugetsoundnearshore.org/technical_papers/marine_fish.pdf) and enclosed in a separate email.

<sup>59</sup> See the example of a sand lance breeding area from the PHS on the Web enclosed with this letter accessed on May 13, 2019 at: <http://apps.wdfw.wa.gov/phsontheweb/> with the filename: “Tacoma Sand Lance Breeding Example.pdf”

<sup>60</sup> EnviroVision, Herrera Environmental, and Aquatic Habitat Guidelines Program, *Protecting Nearshore Habitat and Functions in Puget Sound* p. II-39 – II-40 (October 2007, Revised June 2010) accessed on May 13, 2019 at: <https://wdfw.wa.gov/publications/00047/> and enclosed with the paper original of Futurewise’s letter to the City of Tacoma Planning Commission dated Feb. 20, 2019.

<sup>61</sup> *Id.* at p. II-43.

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May 15, 2019  
Page 14

recovering salmon including the Chinook salmon on which the southern resident orcas depend. So, we support improvements in the requirements to maintain and enhance vegetation in shoreline jurisdiction.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 Ext. 102 and email: [tim@futurewise.org](mailto:tim@futurewise.org).

Very Truly Yours,

A handwritten signature in blue ink, consisting of two stylized, overlapping loops that resemble the letters 'S' and 'T'.

Tim Trohimovich, AICP  
**Director of Planning & Law**

Enclosures

Technical Report 2007-03



# Marine Forage Fishes in Puget Sound

Prepared in support of the Puget Sound Nearshore Partnership

**Dan Penttila**

Washington Department of Fish and Wildlife



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# Valued Ecosystem Components Report Series

PUGET SOUND  
NEARSHORE  
PARTNERSHIP



RESTORING OUR  
ECOSYSTEM HEALTH

The Puget Sound Nearshore Partnership (PSNP) has developed a list of valued ecosystem components (VECs). The list of VECs is meant to represent a cross-section of organisms and physical structures that occupy and interact with the physical processes found in the nearshore. The VECs will help PSNP frame the symptoms of declining Puget Sound nearshore ecosystem integrity, explain

how ecosystem processes are linked to ecosystem outputs, and describe the potential benefits of proposed actions in terms that make sense to the broader community. A series of “white papers” was developed that describes each of the VECs. Following is the list of published papers in the series. All papers are available at [www.pugetsoundnearshore.org](http://www.pugetsoundnearshore.org).

Brennan, J.S. 2007. Marine Riparian Vegetation Communities of Puget Sound. Puget Sound Nearshore Partnership Report No. 2007-02. Published by Seattle District, U.S. Army Corps of Engineers, Seattle, Washington.

Buchanan, J.B. 2006. Nearshore Birds in Puget Sound. Puget Sound Nearshore Partnership Report No. 2006-05. Published by Seattle District, U.S. Army Corps of Engineers, Seattle, Washington.

Dethier, M.N. 2006. Native Shellfish in Nearshore Ecosystems of Puget Sound. Puget Sound Nearshore Partnership Report No. 2006-04. Published by Seattle District, U.S. Army Corps of Engineers, Seattle, Washington.

Eissinger, A.M. 2007. Great Blue Herons in Puget Sound. Puget Sound Nearshore Partnership Report No. 2007-06. Published by Seattle District, U.S. Army Corps of Engineers, Seattle, Washington.

Fresh, K.L. 2006. Juvenile Pacific Salmon in Puget Sound. Puget Sound Nearshore Partnership Report No. 2006-06. Published by Seattle District, U.S. Army Corps of Engineers, Seattle, Washington.

Johannessen, J. and A. MacLennan. 2007. Beaches and Bluffs of Puget Sound. Puget Sound Nearshore Partnership Report No. 2007-04. Published by Seattle District, U.S. Army Corps of Engineers, Seattle, Washington.

Kriete, B. 2007. Orcas in Puget Sound. Puget Sound Nearshore Partnership Report No. 2007-01. Published by Seattle District, U.S. Army Corps of Engineers, Seattle, Washington.

Leschine, T.M. and A.W. Petersen. 2007. Valuing Puget Sound's Valued Ecosystem Components. Puget Sound Nearshore Partnership Report No. 2007-07. Published by Seattle District, U.S. Army Corps of Engineers, Seattle, Washington.

Mumford, T.F. 2007. Kelp and Eelgrass in Puget Sound. Puget Sound Nearshore Partnership Report No. 2007-05. Published by Seattle District, U.S. Army Corps of Engineers, Seattle, Washington.

Penttila, D. 2007. Marine Forage Fishes in Puget Sound. Puget Sound Nearshore Partnership Report No. 2007-03. Published by Seattle District, U.S. Army Corps of Engineers, Seattle, Washington.

*Front cover: Pacific herring (courtesy of Washington Sea Grant).*

*Back cover: Schooling Pacific sand lance, left, and surf smelt, right. (Photos courtesy of Dan Penttila.)*

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For further information or printed copies of this report, contact Curtis Tanner, Local Project Manager, Puget Sound Nearshore Ecosystem Restoration Project, Washington Department of Fish and Wildlife, 600 Capital Way North, Olympia, Washington 98501-1091.  
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To download PDF files of this and other reports in the series, visit our Web site at [pugetsoundnearshore.org](http://pugetsoundnearshore.org).  
*curtis\_tanner@fws.gov.*

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## Executive Summary

Forage fishes are small, schooling fishes that are key prey items for larger predatory fish and wildlife in a marine food web. In Puget Sound, forage fish species occupy every marine and estuarine nearshore habitat. Because of their role as critical prey species, including for economically important predators such as salmon, recent attention has been paid to their conservation and protection. Nearshore habitats are of special concern, because many species use them for spawning.

Pacific herring (*Clupea pallasii*), surf smelt (*Hypomesus pretiosus*), Pacific sand lance (*Ammodytes hexapterus*), and their critical spawning habitats, all commonly occur within the nearshore zone of Pacific Northwest beaches. Within the Puget Sound Basin, where their spawning areas have been most completely mapped, each species appears to use approximately 10 percent of the shoreline spawning habitat during the year. Some, like herring, spawn in only a few geographically disjunct areas, whereas surf smelt and sand lance have widespread spawning grounds. Each species has particular habitat requirements for spawning; for example, a relatively restricted sediment grain size, particular tidal heights, or specific vegetation types. For all species, however, only a fraction of the apparently appropriate habitat area within Puget Sound is actually used. Some species tend to use the same beaches annually. Adjacent nearshore habitats are used as nursery grounds by all three species.

Other forage fish species do not spawn on Puget Sound beaches but use nearshore ecosystems in other ways. Northern anchovy (*Engraulis mordax*) are pelagic schooling fish that spawn and incubate their eggs in open water. Eulachon (“Columbia River smelt”, *Thaleichthys pacificus*) and longfin smelt (*Spirinchus thaleichthys*) are anadromous, using gravel in freshwater streams for their spawning habitat. Longfin smelt stocks are known to spawn in Puget Sound Basin rivers (Nooksack and Cedar), and its non-spawning life stages may occur in the marine nearshore zone. These species represent the largest biomass in Lake Washington.

Little is known about any forage fish species away from their spawning grounds. Herring appear to be either resident or migratory but generally do not persist in the nearshore system in large schools after spawning. Herring spawning biomasses have been closely monitored and have stayed moderately stable for 20 years. Other species have not been monitored soundwide, and regular monitoring of some spawning beaches has only recently been initiated. However, spawning beaches are vulnerable to a wide variety of impacts from human development, especially removal of riparian vegetation and processes such as armoring and dredging that change the sediment quality and quantity in the intertidal and shallow subtidal zones. This means that these valued ecosystem components must be considered at risk and in need of conservation and restoration actions.

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## Preface

The status of Puget Sound forage fishes, especially herring stocks, is of general public interest in the region because of the large population of recreational anglers and wildlife watchers. Their societal importance is based largely on their apparent importance to provide forage for creatures higher in the marine food web (Figure 1) that are of either consumptive (e.g., salmon) or non-consumptive (e.g., herons) importance to society. In the past, sizeable commercial fisheries occurred on local herring stocks (for fish meal, fish oil, sac-roe and roe-on-kelp). Now, however, herring are commercially important in Puget Sound only as fresh or frozen sport-bait for recreational fishing. Northern anchovy are not harvested within Puget Sound, although relatively small quantities are harvested for recreational fishing bait on the outer coast of Washington state.

Surf smelt are recreationally and commercially important harvests for human consumption at scattered locations

throughout the Puget Sound Basin. Most such harvests, by sport dip nets and small commercial beach seines, take place as the fish come into very shallow water to deposit their eggs at predictable times and places. Some docks and piers in Puget Sound support hook-and-line “jig” fisheries for non-spawning surf smelt during the winter months. Long-fin smelt occasionally support some harvest activity for human consumption, by long-handled dip nets, during their winter spawning migrations to the lower Nooksack River.

Pacific sand lance have never been harvested commercially in the Puget Sound Basin, and commercial exploitation of the species has recently been banned by the Washington Department of Fish and Wildlife (WDFW), given their important ecological role. Incidental catches of sand lances are dip-netted from “bird-balls” or “bait balls” by recreational anglers during local salmon fishing seasons as a preferred sport-bait for Chinook salmon.

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# Introduction

Forage fishes are loosely defined as small, schooling fishes that form critical links between the marine zooplankton community and larger predatory fish and wildlife in a marine food web (Figure 1). Forage fish species occupy every marine/estuarine nearshore habitat in Washington state. In the last 30 years, the conservation and management of critical habitats for forage fish species, largely limited to their known spawning sites, has been an integral part of local habitat management programs.

The three most common forage fish species are Pacific herring, surf smelt and sand lance; many of the intertidal and shallow subtidal areas within the Puget Sound Basin constitute spawning habitat for these species. Nearshore ecosystems also provide important nursery and feeding grounds for these species during their first year of life. Other forage fish species (northern anchovy, eulachon and longfin smelt) do not spawn on the beaches but do use nearshore habitats during other parts of their life histories and thus are included in this document.

Obligate spawning in nearshore habitats by herring, surf smelt and sand lance make them vulnerable to the cumulative negative impacts of a wide variety of shoreline development activities. The use of relatively limited portions of marine shorelines for spawning habitat by all three species may also produce vulnerable aggregations of pre-spawning adults during this portion of their life cycles. A very large proportion of the shoreline of the Puget Sound Basin has

been altered in various ways by human development activities, to the possible detriment of these species. This vulnerability has resulted in this species group being given special regulatory attention in recent decades. The language of Washington Administrative Code (WAC) 220-110, the Hydraulic Code Rules governing hydraulic permit approvals by the WDFW, lists herring, surf smelt and sand lance spawning habitats as “marine habitats of special concern.” A “no net loss” approach is applied to these habitats. The state Growth Management Act (GMA) includes herring and surf smelt spawning areas as examples of priority fish and wildlife habitat conservation “critical areas”, for which there is an expectation of mapping and protective designations. This species group’s ecological importance and critical habitat vulnerability have led to their inclusion in the species and habitat lists of the WDFW’s Priority Habitats and Species (PHS) Program.

Puget Sound forage fish populations are not generally considered threatened or endangered. Two petitions to list Puget Sound herring stocks as threatened or endangered under the Endangered Species Act in recent years have failed to produce sufficient evidence to do so. However, the status or relative abundance of Puget Sound surf smelt, sand lance, northern anchovy or longfin smelt stocks are currently unknown, for lack of a cost-effective methodology and funding priority to assess them.

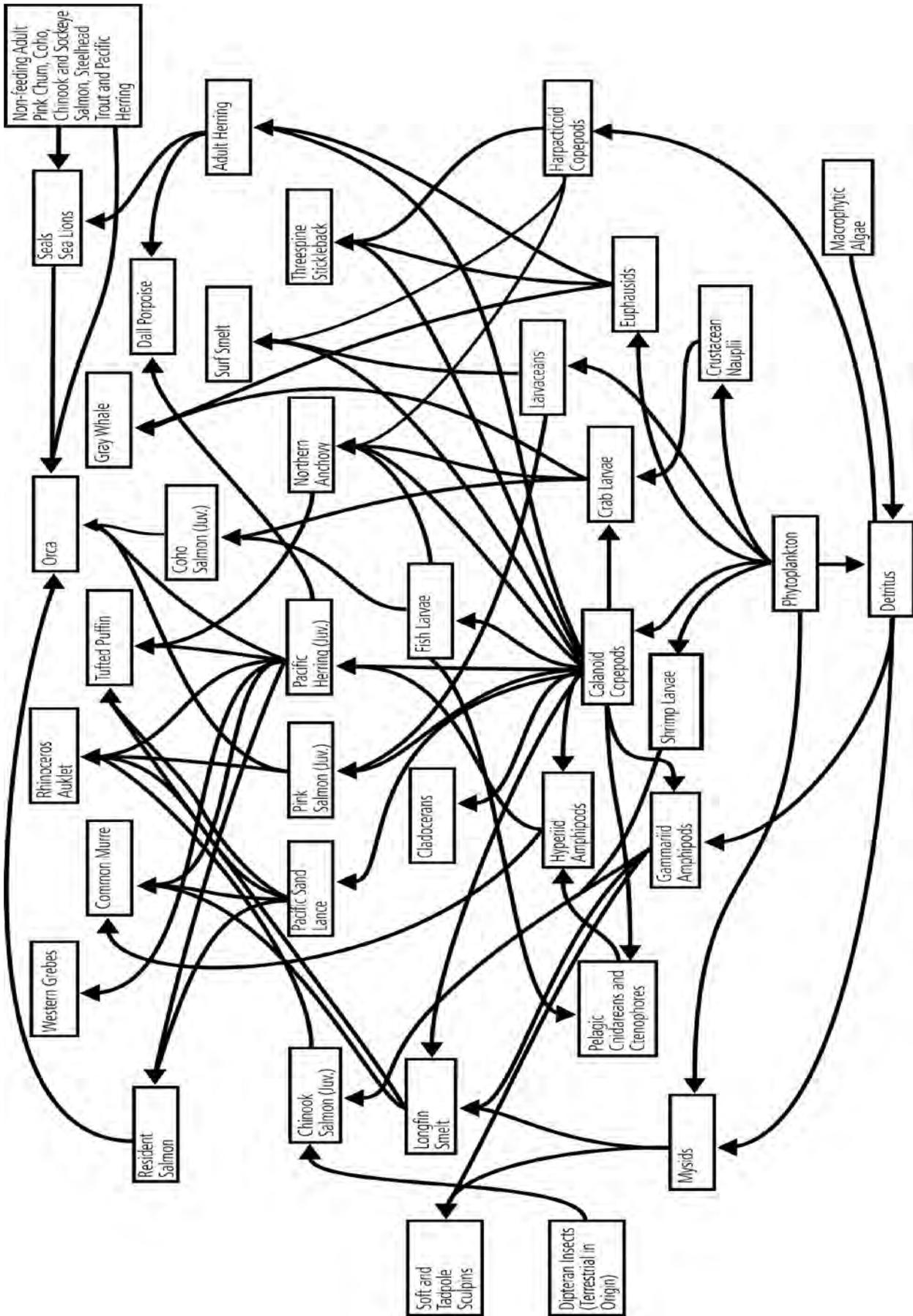


Figure 1. Nearshore open water food web. Note forage fish positions between macro-zooplankton and secondary predators (adapted from Simenstad et al. 1979).

# Background: Distribution And Spawning Areas

## Pacific Herring

Pacific herring are a pelagic species widespread throughout the marine waters of Washington. Approximately 20 individual herring stocks occupy the Puget Sound Basin, from Dungeness Bay east, and from the United States-Canada border south to the Olympia area (Figure 2). Spawning herring also frequent Grays Harbor and Willapa Bay on Washington's outer coast (Lemberg et al. 1997, Stick 2005). Each stock, defined by a geographically distinct spawning area with predictable timing of spawning activity (Figure 3), is thought to be autonomous. WDFW monitors the sta-



**Figure 2.** Documented herring spawning areas in the Puget Sound basin.

tus of most of the herring spawning stocks of Washington on an annual basis, through a program of hydro-acoustic/mid-water trawl assessment surveys of certain pre-spawning holding areas, or a spawn-deposition survey program for priority spawning areas. Annual spawning-escapement biomasses are estimated (Stick 2005). For many spawning populations, these data have been collected annually by WDFW since the mid-1970s.

## Northern Anchovy

Northern anchovy populations in the Puget Sound Basin have not been a specific target of assessment by WDFW. This species occurs throughout the region, as evidenced by their incidental occurrence in WDFW's hydro-acoustic/midwater trawl survey catches targeting herring during the winter months. Also, anchovy spawning is known to occur in both southern Puget Sound and the Strait of Georgia (Whatcom County) during the summer months, suggesting resident populations.

## Surf Smelt

The surf smelt is a common and widespread nearshore forage fish throughout Washington marine waters. Spawning activity occurs in a wide variety of wave-exposure regimes, from very sheltered beaches in southernmost Puget Sound and Hood Canal to fully-exposed pebble beaches on the outer coast of the Olympic Peninsula. Spawning activity is distributed throughout the Puget Sound Basin, and stock boundaries cannot be defined geographically. Currently, about 10 percent of the shoreline of the Puget Sound Basin is documented to be surf smelt spawning habitat (Figure 4). Spawning regions are commonly occupied during the summer (May-August), fall-winter (September-March), or year-round (spawning every month, perhaps with a seasonal peak) (Figure 5).

WDFW does not attempt to assess the annual status of surf smelt spawning stocks Puget Sound-wide. Their nearshore behavior, and the distribution of many tiny spawning events over long reaches of shoreline over long periods each year, have precluded the application of hydro-acoustic/midwater trawl surveys or spawning ground surveys for stock monitoring, as is done for herring. Present-day surf smelt fishery harvests are relatively small and limited by markets and privatization of the local shorelines.

## Pacific Sand Lance

Sand lance, colloquially referred to as candlefish by local anglers, are also a common and widespread forage fish of the nearshore marine waters of Washington, including all of the greater Puget Sound Basin. It is the least known of the three shore-spawning forage species. Very little species-specific

South-Central Puget Sound	January	February	March	April	May	June
Squaxin Pass						
Wollochet Bay						
Quartermaster Harbor						
Port Orchard-Madison						
South Hood Canal						
Quilcene Bay						
Port Gamble						
Kilisut Harbor						
Port Susan						
Holmes Harbor						
Skagit Bay						
North Puget Sound	January	February	March	April	May	June
Fidalgo Bay						
Samish/Portage Bay						
Interior San Juan Island						
Semiahmoo Bay						
Cherry Point						
Strait of Juan de Fuca	January	February	March	April	May	June
Discovery Bay						
Dungeness/Sequim Bay						

Figure 3. Documented spawning times for Puget Sound herring stocks.

biological data are available (Field 1988).

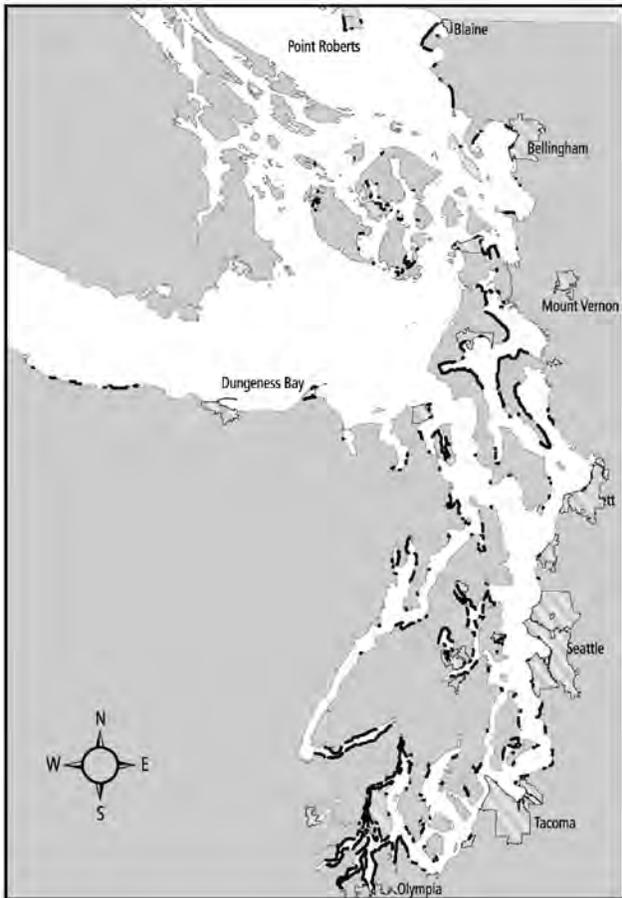
Sand lance spawning habitat has been documented in the Puget Sound Basin only since late 1989, when a protocol for detecting eggs in suitable substrate was developed (Penttila 1995a, b). Currently, about 10 percent of the basin's shoreline has been documented as sand lance spawning habitat (Figure 6). Additional sand lance spawning beaches continue to be found during ongoing habitat survey projects (WDFW unpub. data). In many instances, the spawning beaches of fall-winter surf smelt and sand lance populations overlap geographically.

WDFW does not attempt to assess the annual status of sand lance spawning populations in the Puget Sound Basin. In addition to dwelling very near shore, sand lances spend part of their diurnal cycle buried in the bottom substrates. They lack an acoustically-reflective air bladder, and they are extremely difficult to capture quantitatively in nets. They deposit their eggs in many tiny individual events scattered over broad reaches of shoreline. Thus, like surf smelt, they are not amenable to the assessment techniques commonly applied by WDFW to herring stock assessment in Puget Sound. Up to the present time, the absence of significant harvest fisheries has not allowed WDFW to assign any priority to sand lance stock assessment.

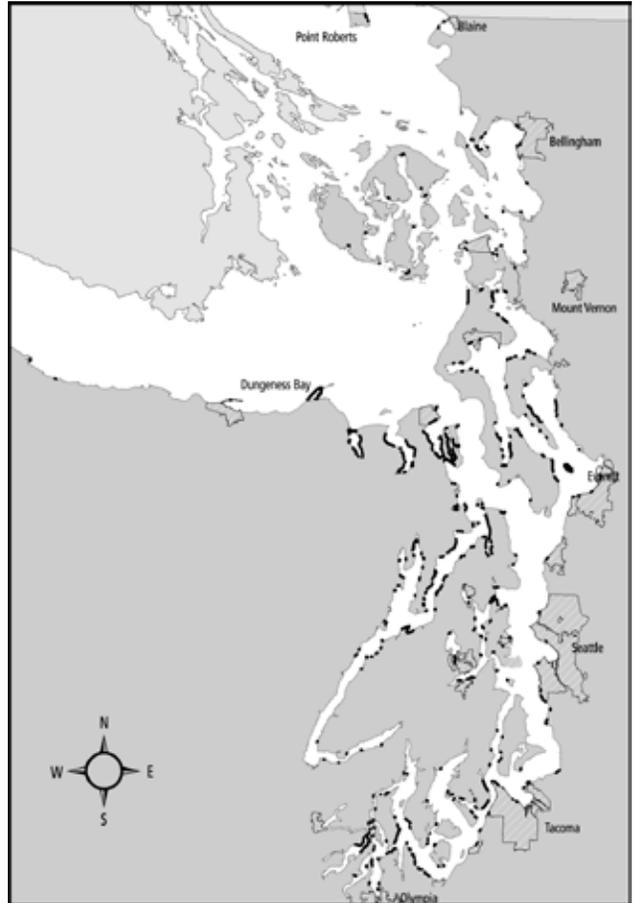
### Longfin Smelt

The only well-documented marine/anadromous spawning population of longfin smelt in the Puget Sound Basin occurs in the Nooksack River and the adjacent marine waters of Bellingham Bay and neighboring Skagit and San Juan counties. A population of longfin smelt is also thought to occur in the Duwamish River. The longfin smelt was identified as a locally common nearshore fish species along the Strait of Juan de Fuca during the University of Washington-Marine Ecosystem Analysis (UW-MESA) surveys of the 1970s, but no adjacent spawning streams have been identified in that area (Simenstad, et al. 1977). The landlocked longfin smelt population inhabiting Lake Washington (King County, WA) has been the target of biological studies (Moulton 1974, Wydoski and Whitney 1979).

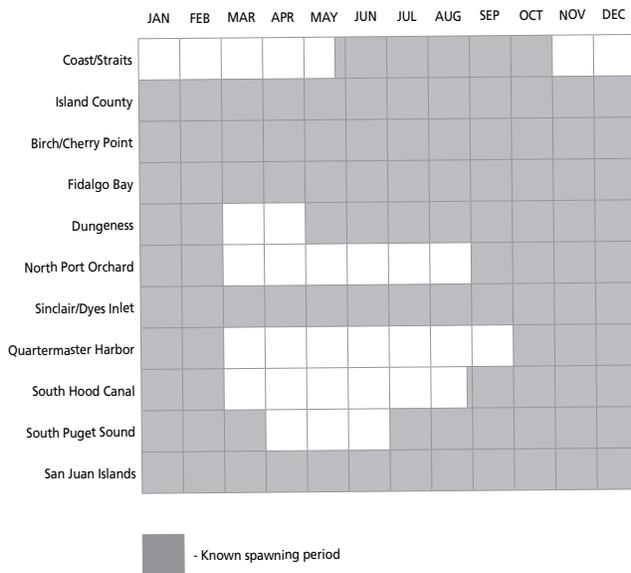
No biological data, stock assessment, or spawning habitat survey data exist for any known marine population of longfin smelt. The species has been an incidental catch during winter hydroacoustic/midwater trawl herring assessment surveys in the Bellingham Bay region (WDFW unpub. data). Longfin smelt may have the most geographically-restricted and vulnerable spawning habitat of any marine/anadromous forage fish species in the Puget Sound Basin.



**Figure 4.** Documented Puget Sound surf smelt spawning beaches as of October 2005.



**Figure 6.** Documented Puget Sound sand lance spawning beaches as of October 2005.



**Figure 5.** Spawning seasons for Puget Sound surf smelt stocks.

# Nearshore Habitat Requirements

## Pacific Herring

Pacific herring congregate in the general area of their spawning grounds several weeks prior to the beginning of spawning activity. Groups of herring will become ready to spawn at intervals over a two-month period, at which time they move from deep water into the shallow nearshore zone for spawn deposition. In Washington, Pacific herring deposit their adhesive eggs almost exclusively on benthic marine macro-vegetation.

The herring spawning seasons vary by area within Washington, but most spawning takes place in February and March (Lemberg et al. 1997, Stick 2005). Spawning may occur as early as late January in some areas and commonly ends in nearly all areas by early April (Figure 3). The Cherry Point herring stock of western Whatcom County is unusual among Washington herring populations because of its mid-April to early June spawning season. The spawning season on any individual spawning ground may last six to eight weeks, during which a number of individual spawning events of varying magnitudes and varying degrees of geographical and timing overlap may occur.

Within herring spawning areas, the depth zone of spawn deposition is largely controlled by the perennial clarity of the water, which in turn controls the amount of ambient light and the maximum depths at which vegetation will grow (Druehl 2000). In some areas with relatively clear water, herring spawn deposition may occur as deep as -10 meters in tidal elevation. In many cases, composition of the substrate will also control the character of the marine vegetation that is present. Most vegetation used by herring for spawning is confined to the shallow subtidal and lower half of the intertidal zone.

Across the Puget Sound region, the native eelgrass *Zostera marina* is of primary importance as a herring spawning substrate (Figure 7). In certain parts of the Puget Sound Basin, especially western Whatcom County, the intertidal and shallow subtidal marine algal turf, often comprising dozens of species of red, green and brown algae, is used by spawning herring (Millikan and Penttila 1973) (Figure 8). In somewhat deeper water, and in areas where native eelgrass beds do not predominate, the mud-bottom-dwelling red alga *Gracilariaopsis* sp. (referred to as *Gracilaria* in some sources) may be the dominant substrate plant (Figure 9).

In a small proportion of the known herring spawning areas, more atypical spawning substrates are used. For example, within Port Susan (Island-Snohomish counties), herring commonly spawn on middle intertidal boulder/cobble rock surfaces with little or no macroalgae (WDFW unpub. data). In the east Hammersley Inlet area (Mason County), herring will occasionally deposit very thick layers of eggs on current-swept subtidal gravel beds in the near absence of macro-vegetation (WDFW unpub. data). In northern Port



**Figure 7.** Eelgrass meadow used as herring spawning habitat, N.W. Hale Passage, Whatcom Co.

Orchard (Kitsap County), herring will also deposit their eggs in relatively deep water on the amassed beds of tubes of the polychaete worm *Phyllochaetopterus* sp.

In Grays Harbor (Grays Harbor County), the primary herring spawning habitat is the outer edges of native salt-marsh beds, where a turf of rockweed (*Fucus*), sea-lettuce (*Ulva*), pickleweed (*Salicornia*) and salt-grass (*Distichlis*) in the uppermost intertidal zone serves as spawn deposition substrate. Herring spawning behavior using salt marshes has not been observed inside Puget Sound. Spawning herring also use salt-marsh vegetation, along with beds of over-wintering cordgrass (*Spartina*) stubble and native eelgrass beds, in Willapa Bay (Pacific County) (WDFW unpub. data). Finally, herring spawning has been observed on dock pilings in Puget Sound and coastal bays (WDFW unpub. data).

Within herring spawning stocks, there are large natural annual and decadal variations in relative abundance (Lemberg et al. 1997, Brett 1985, Stick 2005). These fluctuations are reflected in the geographic distribution of spawn deposition along a shoreline. Most spawning areas appear to have “outlier” areas, used only during periods of high abundance, and “core” areas, into which spawning activity withdraws during periods of low abundance.

Herring spawning habitat is the critical life history element that can be identified and managed. An essential element of herring spawning habitat appears to be the presence of perennial marine vegetation beds at rather specific locations. A natural selection of spawning sites has probably been taking place in the Puget Sound Basin over the last few thousand years, since the last retreat of Ice Age glaciers, the stabilization of sea level and shoreline location, and re-establishment of marine vegetation beds.

It is not known how groups of fish have selected present-day



**Figure 8.** Intertidal algae bed with heavy herring spawn, S. Cherry Point, Whatcom Co.

herring spawning areas in such a short geologic time. Judging from the distribution of the existing herring spawning sites within Puget Sound, it is obvious that not all vegetated shorelines within the basin have been equally attractive to ripening herring. About 10 percent of the shoreline has been selected by the spawning fish, generally in sheltered bays (Figure 2). Marine vegetation beds within the selected sites are not of discernibly higher quality than vegetation on adjacent shorelines that are never used by the spawning fish. Thus, it appears that location is rather more important as a selection criterion than the mere presence of marine vegetation beds, which are virtually ubiquitous along the Puget Sound shoreline, regardless of aspect and exposure regime.

Within the geographical limits of the various known herring spawning areas, factors affecting the distribution and abundance of marine vegetation over time and space are critical to herring stock maintenance. An unintentional experiment on the impacts of a gross and abrupt change in the abundance of a herring stock's preferred spawning substrate is currently under way in Westcott-Garrison Bays, San Juan County (Wyllie-Echeverria et al. 2005). For unknown reasons, vast beds of native eelgrass almost completely disappeared from these bays during 2000-2004. These eelgrass beds had supported annual herring spawning activity since the mid-1970s (Stick 2005). Coincident with the disappearance, herring spawn has not been detectable by WDFW surveys during 2004-2006, and the current status and fate of this small herring stock is unknown.

Individual herring egg broods take up to two weeks to hatch, at which time the yolk-sac larvae inhabit the near-shore plankton around the spawning areas (Millikan and Penttila 1974). The planktonic larvae drift in the water column for some weeks after hatching. After the first week of drift, the larvae exhaust their yolk sac nutritional reserves and must be in the presence of microplankton of appropriate type and density to begin feeding successfully on their own. This circumstance, along with the varying character

of potential predators upon the larvae, is thought to characterize an annual critical period in the larval-herring life history that may have great impact on future abundance of the year-class (Alderdice and Hourston 1985). The late-winter/early-spring herring spawning/hatching season might have evolved to take best advantage of the spring increase in planktonic productivity, which may be triggered earlier, more densely and more consistently in sheltered bays. Part of the spawning site-selection process might have been a higher survival rate among fish that spawned in the vicinity of potentially more suitable larval nursery grounds or at sites where the early larvae would most consistently be transported to such grounds by tidal currents. In Puget Sound, juvenile herring inhabit nearshore waters through their first several months of life, and then move into deeper water during September-October. They appear to remain inside Puget Sound until their second year of life, when some of the year-class may mature and spawn.

While herring spawning sites are remarkably consistent and predictable in their annual usage, it appears that neither post-spawning adult herring nor pre-recruit herring persist in numbers in the immediate vicinity of any spawning ground during non-spawning times of year. Puget Sound herring are thought to be a mix of "resident" and "migratory" stocks, with the migratory populations cycling between winter spawning grounds in the inside waters and the conti-



**Figure 9.** Sample of *Gracilariopsis* with herring spawn, Quartermaster Harbor, King Co.

mental shelf off the mouth of the Strait of Juan de Fuca in the summer months. The consistency of spawning site usage is coupled by an apparent consistency in the usage of certain pre-spawning holding areas, where ripening fish assemble adjacent to spawning sites some months before the onset of spawning activity. Presumably, this life-history phase has also been under selective pressure. The specificity and predictability of spawn deposition in time and space suggests that herring stocks “home,” and thus may be genetically distinct. It has been hypothesized that while the bulk of herring migration and spawning actions are under genetic control, the fish may also have the capacity to explore for additional spawning habitats. Intuitively, herring must have this capacity, enabling them to rapidly recolonize the glaciated coastlines of the northeast Pacific Ocean following the most recent glacial retreat.

Given that herring may have the ability or tendency to colonize new shores and spawning grounds, what constitutes a fully-colonized nearshore ecosystem is not known. The shores of the Puget Sound Basin have not been monitored completely or continuously enough over time to detect, with any certainty, possible efforts by herring to establish wholly new spawning areas. Within their extended geographical range, from northern Baja California to northern Honshu Island, Japan, Pacific herring are quite flexible in the oceanographic contexts in which they are known to spawn.

Even when dwelling near shore, herring feed upon planktonic organisms. Calanoid copepods made up the bulk of the diet of juvenile herring in the Strait of Juan de Fuca nearshore zone (Simenstad et al. 1977). Midwater trawl-caught, post-spawning adult herring have been observed to have fed heavily on both calanoid copepods and euphausiids (WDFW unpub. data).

## Surf Smelt

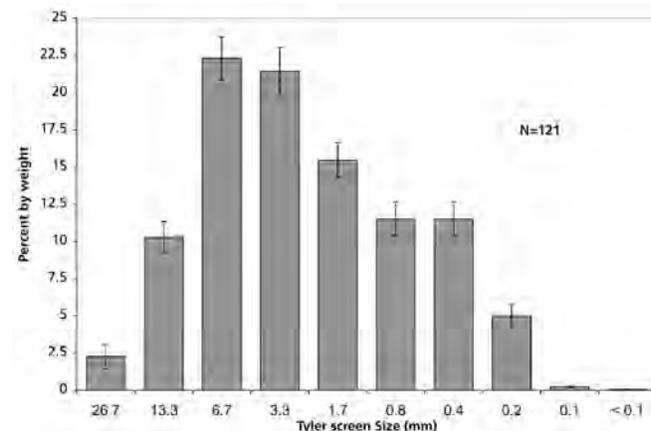
Little is known about the life history of surf smelt away from their spawning grounds. Stocks that have been studied include one- and two-year-old fish, with few fish surviving beyond age four (Penttila 1978). They do not generally form large open-water pelagic schools. They may reside near the shoreline in the general area of their spawning sites for their entire lives. There is no evidence of surf smelt making annual migrations from their spawning sites to the open ocean. Nearshore-dwelling surf smelt in the Strait of Juan de Fuca feed primarily on calanoid copepods, with a small proportion of their diet consisting of small epibenthic crustaceans (Simenstad et al. 1977, Simenstad et al. 1979).

The life history of the surf smelt is intimately linked to nearshore geophysical processes. The critical element of surf smelt spawning habitat is the availability of a suitable amount of appropriately textured spawning substrate at a certain tidal elevation along the shoreline. Their potential spawning/spawn incubation zone spans the uppermost one-third of the tidal range, from approximately +7 feet up to

extreme high water (EHW) in central Puget Sound or the local equivalent. Spawning substrate grain size is generally a sand-gravel mix, with the bulk of the material in the 1-7 mm diameter range (Schaefer 1936, Penttila 1978) (Figure 10). The thickness of the spawn-bearing substrate layer on the upper beach will vary with local wave-action and sediment-supply regimes, ranging from 1-10 cm. The physical area of spawning substrate can vary from a discontinuous array of small patches around the high tide line to nearly continuous bands of material several meters wide and several kilometers long.

Within a typical sediment drift cell, surf smelt spawning habitat may be limited at the erosional beginning of the drift cell, where beaches tend to be overly coarse in sediment texture. Surf smelt may also be limited at the depositional end of a drift cell, where the upper beach may be overly sandy in character. Approximately 10 percent of the shoreline of the Puget Sound Basin is used by surf smelt for spawning habitat (Figure 4). Most of beaches on the Puget Sound shoreline that appear outwardly suitable for surf smelt spawning habitat are apparently not used by the fish, at least to a degree where spawn can be detected by current forage fish spawning habitat survey protocols (Penttila 1995a, Moulton and Penttila 2001). Most spawning beaches are used on an annual basis, although there are “outlier” sites that may be used only during periods of high local stock abundance.

Surf smelt spawning may occur at irregular, short intervals at any particular site. Spawning takes place in just a few inches of water just below the waterline during high tides (Figures 11 and 12). Spawning events a few days apart are commonly superimposed on each other, and it is not uncommon for an area to contain two to five individual broods of eggs. Once a spawning season begins, the rate of new egg deposition coupled with hatchings will likely provide the site with a continuous deposit of eggs for several months.



**Figure 10.** Puget Sound surf smelt spawning substrate grain-size spectrum.



**Figure 11.** Fresh surf smelt spawn patch, southern Dugualla Bay, Whidbey Island.

The surf smelt's spawning substrate is a rigorous environment, and the eggs appear to be resistant to some degree of thermal shock and desiccation stress. Typical surf smelt spawn substrate is rather sparsely inhabited by other macroscopic organisms. Epifaunal or infaunal predators on incubating surf smelt eggs have not been documented.

Surf smelt appear tolerant of the highly variable salinity regimes found on and around their spawning beaches; immersion in freshwater seeps during low tides is not uncommon (Penttila 1978). Thus there is little of the upper marine nearshore wetted perimeter anywhere in the Puget Sound Basin that these fish might be deterred from exploring, if suitable substrate is present at the appropriate tidal elevation. They appear not to be deterred by fallen trees, brush, or large woody debris. The maximum landward edge of the substrate zone accessible to the spawning fish will vary between spring and neap periods of the tidal month. During the higher high tides of a spring-tide period, the fish may spawn upon substrates that will not be wetted directly again until the next spring tide series. During the fall-winter periods' cool, moist weather conditions, this spawn can survive to hatching (WDFW unpub. data).

Some elements of surf smelt spawning habitat quality are intimately associated with the character of the bordering uplands. Natural erosion of the unconsolidated bluffs of



**Figure 12.** Fresh surf smelt spawn patch outlined, N.W. Bellingham Bay, Whatcom Co.

Quaternary sand/gravel is thought to contribute most of the sediments present on a Puget Sound beach (Johannessen and MacLennan 2007). Shade provided by the overhanging canopies of trees growing in the backshore zone is important during the summer incubation period (Penttila 2002, Rice 2006) (Figure 13).

During the summer, incubation times are about two weeks, while during cold winter weather, it may be four to eight weeks. Eggs on the surface are easily killed by sun or wind exposure during the summer. Overhanging shade trees above the upper beach greatly moderate this loss (Penttila 2002, Rice 2006) (Figure 13). Shade is unnecessary during the fall-winter season, when ambient temperatures result in much lower mortality rates.

Like the Pacific herring, surf smelt have managed to colonize the entire length and breadth of the Puget Sound Basin in the short time since the glaciers receded. Surf smelt may be similarly consistent with local herring stocks in their



**Figure 13.** Shaded summer surf smelt spawning habitat, eastern Camano Island.

predictable use of certain shorelines for spawning at certain seasons of the year. All spawning beaches first mapped by the Washington Department of Fisheries (WDF) in the 1930s are still being used at present, if they have survived detrimental human impacts in the interim (Schaefer 1936).

Surf smelt, however, differ significantly from herring in the relatively widespread occurrence of their spawning beaches along Puget Sound shorelines. While herring have geographically disjunct spawning grounds, surf smelt spawn over a much broader variety of shoreline aspects and exposures. Their mapped spawning sites are distributed rather evenly all across the landscape, and there are no obvious grounds for stock definition or isolation in geographical terms. Though the specificity of surf smelt spawning activity at certain sites and times suggests a degree of homing to their beaches of origin, this has not been proven. Mechanisms of surf smelt spawning site detection, selection, and the triggering of spawning activity are also unknown.

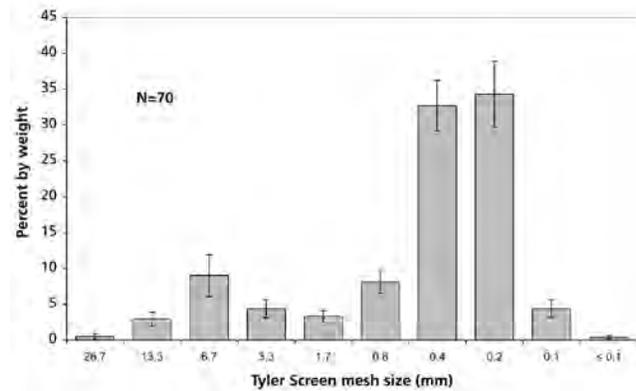
The potential for genetic interchange between spawning populations seems great: surf smelt larvae are planktonic drifters for a number of weeks after hatching; the spawning beaches are often at sites exposed to tidal currents; and the spawning beaches may produce larvae continuously for a season spanning many months. Young-of-the-year surf smelt are virtually ubiquitous along Puget Sound shorelines.

## Pacific Sand Lance

Although the species are taxonomically unrelated, the spawning habitat of the Pacific sand lance generally resembles that of the surf smelt: upper intertidal beaches consisting of sand and gravel (Penttila 1995b). Their spawning sites are also similarly scattered evenly over the landscape of the Puget Sound Basin, to such a degree that hypothetical geographical stock boundaries are not apparent (Figure 6). Co-occurrence of eggs of the two species in the substrates is common during the winter, when the spawning seasons of Puget Sound sand lance and winter-spawning surf smelt populations overlap. The eggs of both species can be found incubating in the same substrate at the same time (Penttila 1995b).

Sand lance spawning habitat attributes derive from physical forces acting on sediment in the upper third of the intertidal zone, generally between mean higher high water (MHHW) and about +5 feet in tidal elevation in central Puget Sound or local equivalent. The grain-size spectrum of typical sand lance spawning substrate can be characterized as sand, finer-grained than that of surf smelt, with the bulk of the material in the range of .2-.4 mm in diameter (Penttila 1995b; WDFW unpub. data) (Figure 14). Beaches at the distal ends of drift-cells, where sandy spits, cusped forelands and other accretionary shoreforms tend to occur, commonly support sand lance spawning (Figures 15 and 16).

Sand lance spawning occurs in fall-winter, between November and February in Puget Sound, mostly during the



**Figure 14.** Puget Sound sand lance spawning substrate grain-size spectrum.

first half of that period (Penttila 1995b). Thus, the presence/absence of overhanging shade trees to moderate temperatures on their spawning beaches is not an important habitat attribute. Similar to surf smelt, incubating sand lance eggs appear to be resistant to wide variations in salinity and temperature. As with surf smelt, spawning occurs during high tides when the upper beach is shallowly covered by water. Sand lance eggs may be deposited slightly lower in the intertidal zone than those of surf smelt. Fresh, undispersed deposits of sand lance spawn often feature patches of eggs resting at the bottom of scattered, shallow pits, excavated in the beach surface by the spawning fish in some unknown manner (Penttila 1995b, Robards et al. 1999). Their incubation time is approximately one month, and repeated episodes of spawning activity may occur during the spawning season on any particular beach. Sand lance spawning sites appear to be used on a perennial basis.

Little is known about the life history or biology of the Pacific sand lance apart from its spawning sites. Sand lance from nearshore fish collections along the Strait of Juan de Fuca were found to feed primarily upon calanoid copepods (Simenstad et al. 1977). Postlarval/juvenile sand lances in the San Juan Islands were also found to feed primarily upon calanoid copepods, along with a variety of other planktonic organisms (Tribble 2000). Planktonic sand lance larvae are common in the nearshore waters of the Puget Sound Basin in the late winter. Juvenile sand lance are common in the nearshore zone through their first summer of life. Pursued and concentrated by alcid seabirds, they commonly attract a variety of predators to their dense surface schools, which salt-water anglers refer to as bait-balls. A broad array of marine bird, mammal and fish species are known to feed on Pacific sand lances, indicating their ecological importance to the marine food web (Field 1988).

Pacific sand lance are highly unusual among local forage fish species in their habit of actively burrowing into nearshore sand-gravel bottom sediments during parts of their diurnal and seasonal cycles of activity (Field 1988, Quinn 1999). Burrowing may occur mostly at night as a predator-avoidance mechanism. Pacific sand lances may also be found bur-



**Figure 15.** Sand lance spawning beach with spawn pits marked, S. Holmes Hbr., Whidbey Island.



**Figure 16.** Sand lance spawning beach with fresh spawn pits, S. Port Gamble Bay, Kitsap Co.

rowing at or below mean lower low water (MLLW) in the upper, oxygenated stratum of intertidal sediments on Puget Sound beaches (Quinn and Schneider 1991, Quinn 1999).

## Northern Anchovy

Northern anchovies are entirely pelagic in their local life histories, releasing floating planktonic eggs that are not targeted to the nearshore zone. They are reported to frequently occur in estuaries throughout the Pacific coast of the mainland United States (Emmett et al. 1991). The narrow, complex, current-swept waterways of the Puget Sound Basin are such that the northern anchovy may be associated with the neritic portion of the nearshore environment, in spite of their pelagic habitat.

The distinctive oval eggs of the anchovy have been recovered from late spring and summer plankton-net catches from western Whatcom County and Carr Inlet in Pierce County (WDF unpub. data). Young-of-the-year anchovies occur in the nearshore zone of Puget Sound in the summer months as a species of lesser abundance than juvenile salmon, herring and squid in nighttime surface-tow net catches (Penttila et al. 1985, Penttila et al. 1986). Northern anchovies are also a species of lesser abundance in winter midwater trawl catches throughout the Puget Sound Basin and never rival Pacific herring in abundance (WDFW unpub. data).

Anchovies are reported to feed on a variety of planktonic organisms, both plants and animals. Depending on the character of the available prey, they may feed either by gill-raker filtering or by visual pursuit of individual larger prey items (Emmett et al. 1991).

## Longfin Smelt

Longfin smelt are an anadromous species, depositing adhesive eggs on river-bottom sediments around the upper ranges of tidal influence of the Nooksack River and possibly other streams in the Puget Sound Basin. Although they do not have a marine nearshore spawning habitat requirement, they may occur in the neritic portion of the nearshore zone of shorelines in the vicinity of their spawning streams. They are reported to occur in many of the larger estuaries of the Pacific coast of the United States (Emmett et al. 1991).

Longfin smelt are a minor component of the pelagic fish community of the Bellingham Bay region during the winter months, comprising a mix of presumed young-of-the-year, maturing adults and recovering-spent females, as evidenced in midwater trawl surveys targeting Pacific herring (WDFW unpub. data). Apart from the south Whatcom/west Skagit/San Juan County region, they have been only rarely encountered elsewhere in Puget Sound during winter herring assessment surveys (WDFW unpub. data). Longfin smelt were found to be locally abundant in surface-townet catches in the nearshore zone on the Strait of Juan de Fuca (Simenstad et al. 1977). However, they were found to be virtually absent in WDFW nearshore night-time surface-townet catches in the south and central Puget Sound Basin during the 1977-1985 period (Penttila et al. 1985).

Longfin smelt collected along the shoreline of the Strait of Juan de Fuca consumed a variety of epipelagic and planktonic prey items, including calanoid copepods, mysids and amphipods (Simenstad et al. 1977). Midwater trawl-caught longfin smelt in the vicinity of the Nooksack River mouth in winter were occasionally observed to have consumed juvenile mud-shrimps, *Upogebia* sp. (WDFW unpub. data).

# Status and Trends

Of the marine forage fishes reviewed in this document, only Pacific herring populations have been monitored by WDF/WDFW with sufficient detail, through annual estimates of relative abundance (annual spawning escapement biomass) for discrete spawning grounds. To provide evidence of trends in abundance over space and time, Stick (2005) offers the most recent summary of Puget Sound herring biomass data, 1975 to 2004, with a brief discussion of biomass estimation methodologies and trends. Over the past few years, the total spawning escapement biomass for pooled Puget Sound herring stocks has fluctuated between 10,000 and 15,000 metric tons annually (Figure 17). While two significant herring stocks, late-run Cherry Point and Discovery Bay, have suffered significant declines in biomass in recent years (for unknown reasons), their declines have been partially matched by increases in the estimated biomass of other Puget Sound stocks. This has resulted in a relatively flat trend in total Puget Sound spawner-herring abundance for about the last 20 years.

Populations of surf smelt, sand lance, northern anchovy and longfin smelt have never been monitored Puget Sound-wide by WDF/WDFW with an intent to establish annual abundance estimates or trends over time. The details of these species' life histories are such that they are not amenable to either the acoustic/trawl sampling of pelagic schools or the estimation of spawner biomass from the mapping of spawn

densities and geographical distributions. Wildermuth (1993) summarized an initial attempt by WDFW to estimate spawner escapement biomass for a few hundred feet of surf smelt spawning habitat in Sinclair Inlet (Kitsap County) for a portion of the local spawning season. The necessary sampling process was very labor-intensive and not practical for large spatial or temporal scales. The number and distribution of suitable "spawn density index" sites needed to meaningfully monitor surf smelt populations over their hundreds of miles of spawning habitat within the Puget Sound Basin are not known.

## Regulatory Environment

Prior to the early 1970s, the geographical distribution of herring, surf smelt and Pacific sand lance and their spawning beaches within the Puget Sound Basin were virtually unknown, and thus the cumulative impacts of human shoreline activities on these habitats were neither recognized nor assessed. The advent of a "Puget Sound Baitfish Project" in late 1971 represented the first dedication of staff and funding specifically to the investigation and management of Washington state forage fish populations by the WDF (Millikan and Penttila 1972). Herring and surf smelt spawning habitat mapping began immediately upon the inception of the Baitfish Project. The development and adoption of agency policies and regulations for the conservation

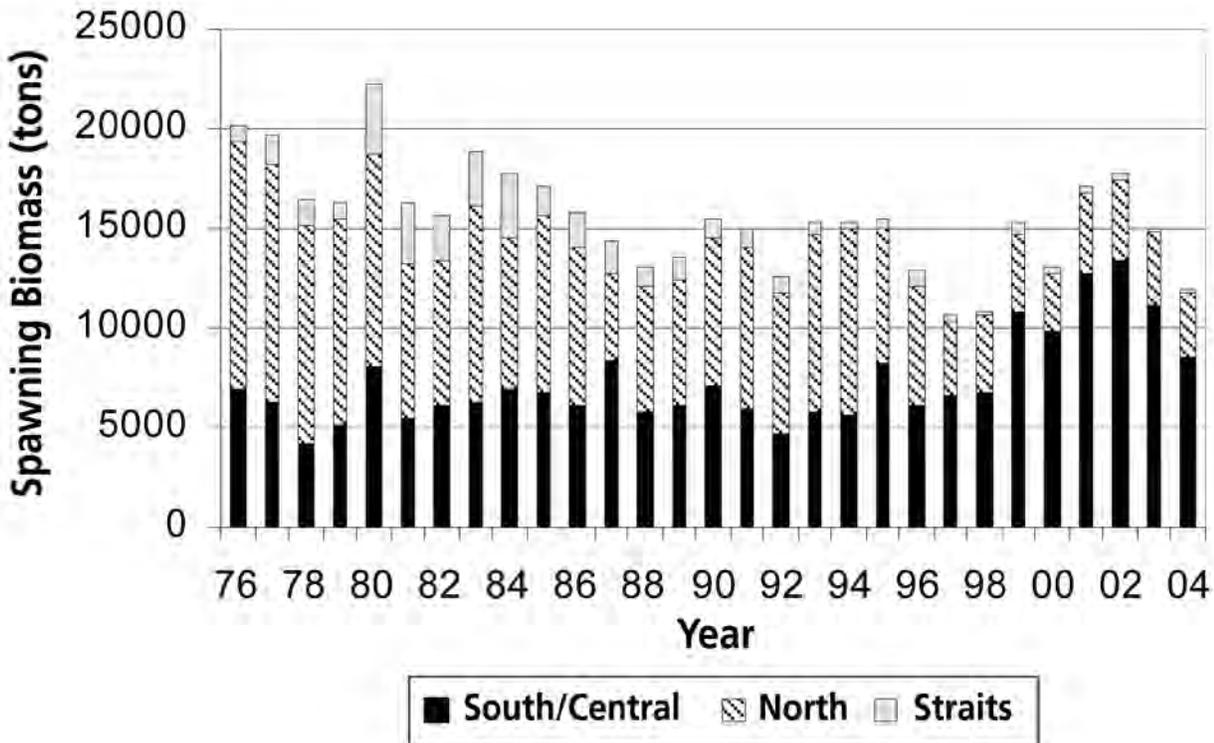


Figure 17. Cumulative Puget Sound estimated herring spawning biomass, 1976-2004.

of these forage fish spawning habitats soon followed, as the vulnerability of these habitats and their continued piecemeal destruction in the region became apparent.

Current WDF/WDFW stances on herring, surf smelt and sand lance spawning habitat protection measures have been generally accepted by other agencies and jurisdictions within the region. The WDFW Priority Habitats/Species (PHS) Program forage fish databases are considered “best available science”, and jurisdictions are urged to adopt and reference them in their Growth Management Act (GMA)-mandated regulatory language.

While application of various regulatory measures has lessened activities destructive to forage fish spawning habitats along Puget Sound shorelines over the past 30 years, it has not eliminated them completely. Various present-day stressors on forage fish spawning habitats are reviewed in a following section. With continued human population growth predicted for the foreseeable future within the Puget Sound Basin, there will presumably be continued, if not increasing, requests for the placement of potentially damaging human infrastructure throughout the marine nearshore zone. These requested actions will continue to frequently involve assessments of potential impacts to known or potential forage fish spawning sites.

## Ecosystem Support Processes, Habitat Attributes, and a Conceptual Model

Puget Sound forage fish populations do not, of course, exist in a biological/geological/physical vacuum. Figure 18 presents a simple conceptual model supporting forage fish occurrences, of all life history stages, within the Puget Sound Basin.

In the left column are items that may be “managed” or restored by human initiatives to allow at least some portion of the physical ecosystem to support forage fish populations. Support of physical aspects is emphasized, especially the presentation of suitable spawn deposition substrates at appropriate tidal elevations and sites. Note that there are important links with the functional responses of other valued ecosystem components: nearshore marine vegetation, sediment input/transport systems, and coastal forests. Note also that the human element is represented here by the role of existing regulatory actions whose enforcement may outweigh other factors in allowing forage fish stocks to persist. Public awareness is also important for the successful conservation of such biological resources.

Maintained or restored ecosystem processes further the establishment of perennial spawning habitats and appropriate

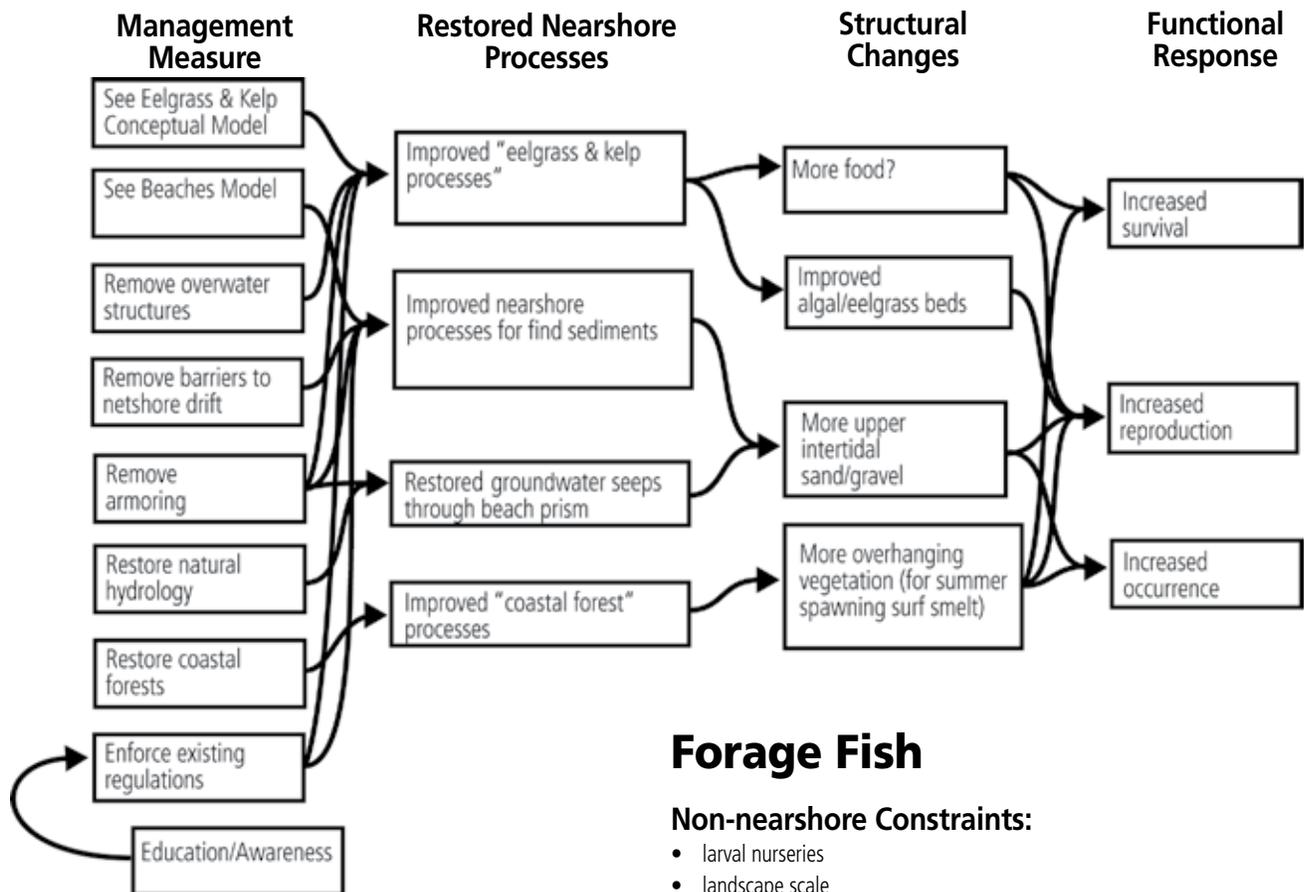


Figure 18. Puget Sound forage fish conceptual model.

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food-item environments, represented in the second column. For forage fish spawning populations, it is critical to maintain or increase beach sediment inputs, drift cell functions, and marine vegetation communities and coastal forests. In addition, maintenance of properly functioning planktonic food webs allows non-spawning forage fishes to use a much more extensive segment of the nearshore zone and adjacent neritic waters as nursery grounds and seasonal residence sites.

There are functional and practical limits to how much of the Puget Sound Basin can be restored to its original condition for the sake of forage fish stock maintenance. In fact, the Puget Sound nearshore environment is probably still being actively degraded by the cumulative effects of both “grandfathered” illegal and permitted shoreline modifications. Restoration initiatives should perhaps be viewed as holding actions, pursued to maintain the status quo.

For all the management actions that might be applied to the Puget Sound ecosystem for the benefit of forage fishes and other nearshore resources, the primary positive functional response (i.e., increased abundance) may be difficult to detect. Abundances may still largely be due to environmental influences beyond human control. Environmental factors influencing forage fish larval survival, recruitment, or year-class strength are among the data gaps and uncertainties listed below.

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# Forage Fish Habitat Stressors And Protection/ Restoration Approaches

Shoreline modifications and development often negatively affect spawning sites of forage fish. A significant proportion of productive forage fish spawning habitat probably was lost in the Puget Sound basin prior to 1973 — a time when critical habitats of these species were ignored and shoreline armoring was largely unregulated. With the development and distribution of forage fish spawning habitat databases by WDFW during the last 30 years, the public and land-use managers have become aware of the critical habitat management and conservation needs of these species.

## Shoreline Armoring

Williams and Thom (2001) reviewed the potential impacts of various forms of shoreline armoring on nearshore environmental factors and resources in the Puget Sound region. Shoreline armoring may be the primary threat to surf smelt and sand lance spawning habitat (Thom et al. 1994). Armoring affects spawning habitat by physical burial of the upper intertidal zone during the course of creating or protecting human infrastructure and activities. Prior to detailed studies of forage fish spawning habitat, it was presumed that the upper third of the intertidal zone could be sacrificed to development without concern. This high beach zone did not appear to support any biological resources. The sheltered bays of the inland waters so important to spawning forage fish have also been the shorelines of highest interest for commercial and residential development.

Armoring also blocks, delays or eliminates the natural erosion of material onto the beach and its subsequent transport (Johannessen and MacLennan 2007). These processes maintain forage fish spawning substrate on the upper beach (Williams and Thom 2001). Although beaches may appear to be stable, their sediment is in constant motion, driven by prevailing wind and waves. The sand and gravel making up forage fish spawning substrate moves along the shoreline and eventually off into deep water, and must be replaced by new material entering the shoreline sediment transport system. A lack of a constant supply of new sand and gravel, primarily derived from eroding shoreline bluffs, may lead to coarsening, lowering of the beach elevation, and thus long-term degradation of spawning habitat.

The WDFW Hydraulic Code Rules stipulate that the construction of bulkheads and other bank protection must not result in a permanent loss of forage fish spawning beds (WAC 220-110-280(4)). Permissible in-water development activities are also subject to seasonal work-closure periods during local forage fish spawning seasons (WAC 220-110-271(1)). WDFW hydraulic permits granted for in-water development actions may stipulate certain measures to mitigate unavoidable forage fish habitat losses and address interruptions to beach sediment sources and movements.

## Dredging

Dredging is a primary activity that can destroy nearshore marine vegetation, to the detriment of herring spawning habitat. Dredging alters nearshore sea-bed topography to accommodate deep-draft vessel traffic and moorage. Nearshore bottomlands are commonly dredged too deep to allow sufficient light for marine vegetation beds to re-colonize and survive, resulting in a net loss of habitat. Dredging is prohibited in herring spawning beds by WDFW under WAC 220-110-320(8).

## Overwater Structures

Nightingale and Simenstad (2001) reviewed the potential impacts of various forms of overwater structure (e.g., docks, ramps, floats, boathouses) on nearshore environmental factors and biological resources in the Puget Sound region. The impacts on forage fishes and their critical habitats vary with the species and the size and configuration of the structure. Surf smelt and sand lance spawning habitats may persist beneath overwater structures if the structures span the spawning habitat zone, and pilings have minimal displacement of beach area, so that upper intertidal sediment distribution and movement are not affected (WDFW unpub. data).

Herring spawning habitat, however, may be impacted by shading from overwater structures, grounding of floats, and accumulation of shell fragments that fall from the structure. There are few species of marine macro-vegetation that can tolerate the reduction in ambient light within the direct footprint of a typical overwater dock or pier, including plant species used by spawning herring (WDFW unpub. data). Introduction of fixed overwater structures invariably results in a die-off of vegetation directly beneath and may also show negative impacts on either side.

In addition, herring eggs deposited on wooden pilings associated with overwater structures may be impacted from uptake of contaminants, especially polycyclic aromatic hydrocarbons (PAH) from creosote (Vines et al. 2000). For unknown reasons, Puget Sound herring occasionally deposit their eggs in unusually high densities and high tidal elevations on nearshore pilings, much higher than on adjacent natural marine vegetation beds. For these eggs, the combined effects of possible chemical contamination from the substrate surfaces, smothering effects on multiple egg layers, and low-tide exposures to thermal shock and desiccation usually result in a nearly complete mortality (WDFW unpub. data).

Research is continuing on designs to promote light penetration beneath overwater structures (Diefenderfer et al. 2004, Blanton et al. 2002, Fresh et al. 2001). Design considerations include raising and narrowing the structure, using grating

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or translucent building materials instead of solid decking, installing reflective surfaces to angle light beneath the structures, orienting structures in a north-south direction, relocating structures to avoid marine vegetation beds, and using the minimum number of piles necessary (Shaffer 2002). At the present time, no technology exists to completely eliminate the impacts of a shading pier on marine vegetation beds (Fresh et al. 2001).

Grounding of floats and rafts is prohibited on surf smelt, Pacific herring, and sand lance spawning beds by WDFW per WAC 220-110-300 (1). Overwater structures and associated moorings must be designed and located to avoid adverse impacts to Pacific herring spawning beds (WAC 220-110-300 (6)). However, at the present time, forage fish habitat-related protective regulations apply only to the areas where spawn has been observed *in situ* by trained observers, there being no spawn detectable on most shorelines even with outwardly suitable-appearing habitat. Complete protection of forage fish spawning habitats of the Puget Sound Basin will depend on a continuing effort to detect and document all such sites.

## Marine Riparian Vegetation

A significant attribute of surf smelt spawning habitat may be the overhead shading provided by the canopies of mature trees rooted in the backshore zone bordering the spawning beaches. Studies have strongly suggested that the presence of shading terrestrial vegetation in the marine riparian corridor has a positive effect on the survival of surf smelt spawn incubating in sand-gravel beaches in the upper intertidal zone during the summer months within the Puget Sound Basin (Penttila 2002). Such overhanging vegetation appears to serve the same function on marine beaches as it does along freshwater streams, moderating ambient temperature and humidity extremes in microhabitats occupied by early life history stages of spawning fishes otherwise adapted to cold climates (Brennan and Culverwell 2004, Rice 2006).

Marine riparian forest corridors and buffer zones lie landward of the jurisdictional reach of the WDFW Hydraulic Code Rules. However, riparian habitat zones bordering aquatic environments are included in the WDFW PHS Program as a priority for management and conservation (WDFW 1999). The ecological functions and values of riparian habitat bordering freshwater aquatic environments outlined by Knutson and Naef (1997), such as wildlife habitat, microclimate, run-off control, bank stabilization, etc., are now understood to apply to vegetated buffers bordering marine waters as well (Brennan 2007). Conservation of these riparian areas is expected during the drafting and updating of local Critical Areas Ordinances (CAO) by local jurisdictions as they seek to comply with the state GMA (WAC 365-190-080). Marine riparian vegetation buffers are also among the critical saltwater habitat classes listed for protection and restoration within the state Shoreline Master Program (SMP) Guidelines (WAC 173-26-221(iii)(A), (B)).

## Aquaculture

Standard aquaculture practices may have profound effects on the benthic ecology of Washington state's tidelands and the conservation of forage fish spawning areas, especially for herring. In many areas, herring spawning grounds are now coincident with shellfish culture areas, particularly on tideflats occupied by beds of the native eelgrass. Pacific oyster (*Crassostrea gigas*) beds intended for the ground-culture and dredge harvest of oysters commonly become devoid of native eelgrass, either due to the cumulative effects of periodic dredging activities over time or by intentional destruction of the eelgrass beds before the start of culture activities (West 1997). Dredging operations routinely take place on or near tideflat areas containing herring spawn (WDFW unpub. data). Currently, the Washington Department of Agriculture (WDA) has regulatory authority over aquaculture activities that occur in intertidal areas of state waters. The Washington Department of Natural Resources (WDNR) has authority over state aquatic bottomlands and marine vegetation management. These agencies together with WDFW should seek a coordinated approach to the management of the growing aquaculture industry, with an eye toward modification of habitat-damaging culture practices and the mitigation of existing habitat degradation for which the industry has been responsible.

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# Forage Fish Data Gaps and Uncertainties

There are many gaps in our knowledge and understanding of the life histories, geographical distributions and ecological roles of the various species of marine forage fishes in the Puget Sound Basin. Up to the present time, governmental-agency forage fish-related activities have largely been centered on harvest management and the documentation and protection of spawning habitats, occasionally with the cooperation of nongovernmental organizations. Research institutions have carried out sporadic projects on certain aspects of local forage fish biology and ecology. The net result of these past efforts is a growing interest in forage fishes and their roles in the Puget Sound ecosystem region-wide, as new initiatives to restore the sound move forward. While some aspects of the life histories of Puget Sound forage fishes are relatively easy to approach, others are not. Remaining data-gaps may require significant investments of time, funds, staffing-power and technologies.

## Herring

### 1. Uncertainty of identity of resident versus migratory stocks.

Currently, it is uncertain whether or which Puget Sound herring stocks are migratory or resident. Investigation would require sampling of offshore summer herring populations and the discovery of genetic markers to identify individual spawning populations wherever they may be available for sampling.

### 2. Location of additional undocumented herring spawning areas.

Unlike surf smelt and sand lance habitat survey programs, the vegetated shorelines of the Puget Sound Basin have never been systematically sampled for the presence of herring spawn during the regional spawning seasons. While known herring spawning sites are afforded no-net-loss regulatory protections from a number of existing regulations and policies, undocumented herring spawning sites are unprotected from damage caused by inappropriate land-use practices.

### 3. Existence or location of perennial larval nursery grounds.

It is hypothesized that the evolution of herring spawning grounds derives from the existence of larval nursery areas in the vicinity. This hypothesis needs to be tested, perhaps with a herring larva sampling program to determine if there are perennial areas of seasonal concentration of larval abundance, and what the attributes of those areas might be.

### 4. Location and ecological roles of herring in the Puget Sound Basin in the non-spawning months.

While WDFW routinely surveys certain herring pre-spawning holding areas throughout Puget Sound in the winter months, no attempt has been made to apply the same hydro-acoustic and mid-water trawl sampling methods to determine the distribution of herring and other pelagic organisms over broad areas of the Puget Sound Basin in the summer and fall. In the case of juvenile herring dwelling in the near-shore zone, other assessment and sampling technologies would have to be applied. This data gap would apply to all the other species of Puget Sound forage fishes as well.

### 5. Unknown herring recruitment mechanisms.

The mechanism by which juvenile herring join a population of adult fish to begin to spawn is unknown, as is the degree to which Puget Sound herring might mix and stray prior to recruitment and during their adult years.

### 6. Impacts of degraded water quality on larval survival in urbanized bays.

Forage fish spawning activity and potential nursery grounds may occur within bays subject to shoreline development and water quality degradation. No information is available as to whether various forms and levels of water quality degradation negatively impact the survival of larval herring and other forage fishes in their first few months of life.

### 7. Causes of perennial herring spawn mass mortalities in certain Puget Sound bays.

Certain subareas of some Puget Sound herring spawning grounds have exhibited a tendency to suffer unusual mass mortalities of herring eggs during their incubation period. Causes have not been determined but may involve sediment toxicity or water quality issues of significance to other nearshore resources as well.

### 8. Efficacy of certain herring spawning habitat restoration/mitigation measures to replace habitat for either stock maintenance or recovery.

There seems to be a growing sense of assurance that marine vegetation beds, including those used by spawning herring, are amenable to mitigation techniques to compensate for loss or damage due to shoreline development. However, there is high uncertainty of the true costs of such projects and the likelihood that they will succeed in replacing herring spawning habitat at a reasonable cost in perpetuity. Appropriate monitoring of permitted projects is extremely important. Any perception of apparent

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success in mitigating for herring spawning habitat may undermine current regulatory efforts to preserve natural spawning grounds intact.

**9. Causes of marine vegetation/herring spawning substrate disappearances in certain Puget Sound bays.**

Striking declines in the geographical distribution and abundance of eelgrass, including known herring spawning habitats, have been documented in a number of small bays in northern Puget Sound. The causes of these abrupt, marked declines are currently unknown and should be investigated for the benefit of not only herring critical habitat conservation but also the soundwide ecosystem in general. Eelgrass stock status monitoring should continue throughout the Puget Sound Basin to detect declines should they occur elsewhere (Dowty et al. 2005).

**10. Population biology, ecology and status of stocks of the calanoid copepods and euphausiids that form the main diet of herring and other forage fishes.**

The distribution, life history, ecology and potential stressors of the primary macro-zooplanktonic food items of herring, the next lower level of the Puget Sound neritic food web, are poorly known. Any such plankton investigations should perhaps be geared to also assess lower food-web levels, phytoplankton, and the micro-oceanographic processes and features at work within the Puget Sound Basin.

## Surf Smelt and Sand Lance

**1. Location of all existing spawning sites in the Puget Sound Basin.**

Spawning habitat survey programs continue to discover previously undocumented surf smelt and sand lance spawning sites on Puget Sound beaches. Support for such programs should continue, so that no-net-loss regulatory protection can be applied to all existing spawning sites in the event of nearby shoreline development proposals. The bulk of the Puget Sound Basin's shoreline is now in private ownership. The likelihood of continued financial and political pressure for shoreline modification by a landownership population largely ignorant of nearshore resource values and conservation risks is high.

**2. Biological parameters for a representative subset of local spawning populations.**

Current data on the population biology of any surf smelt or sand lance spawning stock is lacking. Future fish stock and habitat management would benefit from better knowledge of the biology of these species' Puget Sound populations.

**3. Cost-effective methods for stock assessment.**

Stock assessment, monitoring and trend analyses for Puget Sound surf smelt/sand lance populations will require the development of new methods of detection and sampling. As noted above, surf smelt/sand lance populations cannot be quantitatively assessed using techniques currently employed for herring assessment.

**4. Long-term impacts of shoreline armoring on spawning substrates/sediment budgets, smelt/sand lance spawning habitats and stock abundance.**

The long-term impacts of shoreline armoring on Puget Sound forage fish spawning habitats and populations are still poorly documented. Research and monitoring should involve, at minimum, thorough investigation of historical records and photography of armored areas and careful stock assessment of remnant forage fish spawning habitats and populations within them.

**5. Analysis of efficacy of spawning habitat restoration/mitigation methods for stock maintenance.**

There is a growing interest in "beach restoration" in the Puget Sound Basin, commonly couched in terms of maintenance and recovery of surf smelt/sand lance spawning habitats and populations, among other environmental gains. An effort should be made to make sure that forage fish habitat restoration is a meaningful and realistic goal of such projects. There should be assurances that the projects are properly monitored in both the short and long term to document their performances in increasing habitat and populations. Beach restoration projects should consider factors that caused the perceived degradation, with an effort to address them. Shoreline restoration should be recognized as possibly a commitment in perpetuity of funding and staffing resources.

**6. Effects of global warming/sea level rise on spawning habitats and their management.**

Occurring as they do as narrow zones of fine-grained substrate high in the intertidal zone, surf smelt and sand lance spawning habitat zones may be vulnerable to "fore-shortening" and degradation in the face of a rapid rise in sea level (Johannessen and MacLennan 2007). The upper intertidal zone may not have sufficient time to advance upon the backshore zone and keep generating beaches of similar width and sediment character. Public perception of a rapid sea-level rise may also promote a heightened societal concern for erosion rates, negative impacts to the economy, land values, and other threats to public safety and institutions that could result in a promotion of hard-armoring practices, to the continued detriment of forage fish spawning habitats.

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## 7. Assessment of potential impacts of oil spills.

Surf smelt and sand lance spawning habitats will be extremely vulnerable to degradation from direct impacts of oil spills. Spawning substrates are very porous, and will entrain and retain oil and spill-breakdown products for long periods of time. Surf smelt and sand lance are short-lived fishes, and may not be able to tolerate widespread spawning habitat contamination without threat of local extinctions of spawning populations. The potential impacts of various forms of oil-spill remediation may also be damaging to beach-spawning forage fishes and their critical habitats. Data arising from the Exxon Valdez oil spill and its remediation effort should be gathered and analyzed for applicability in both planning and procedures for oil spill responses on sandy-gravel beaches in the Puget Sound Basin.

## Northern Anchovy

### 1. Assessment of northern anchovy populations.

Northern anchovy populations could be assessed in the same manner as are pre-spawning herring populations, by way of hydro-acoustic/mid-water trawl surveys. Such data on non-spawning populations would be obtained from current WDFW winter herring survey programs. Presumably, northern anchovy spawning populations could be similarly assessed during the summer months by the same technologies.

### 2. Documentation of northern anchovy spawning ecology in Puget Sound.

Northern anchovies are now known to spawn throughout the Puget Sound Basin (WDFW unpub. data). Their pelagic eggs appear to be easily detectable by relatively simple plankton-sampling techniques. Knowledge of the distribution, densities and seasons of occurrence of anchovy eggs and larvae across the Puget Sound Basin could form a basis for critical-habitat conservation efforts for this species, much as it has for other local forage fish species.

## Longfin smelt

### 1. Documentation of the spawning ecology of longfin smelt in Puget Sound rivers.

The investigation of this species would necessarily involve linkages between the marine waters of Puget Sound and its tributary rivers. Longfin smelt spawning populations may be amenable to hydro-acoustic/mid-water trawl survey techniques in the general area of the mouths of their spawning rivers, judging from their occurrence during WDFW Bellingham Bay winter herring surveys (WDFW unpub. data). However, their occurrence elsewhere in the Puget Sound Basin is poorly known. Efforts could be made to sample river-bottom sediments and materials suspended in lower-river water columns during the winter/spring months to document other spawning streams. Incidental data could also be gathered in this manner on the occurrence of spawning stocks of the eulachon and American shad, other anadromous forage fishes for which there is virtually no life-history information within the Puget Sound Basin. More detailed information on the riverine spawning ecology of anadromous forage fishes is needed for rational management of these rivers and their benthic sediments.

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## Conclusion

Over the last 30 years, marine forage fish conservation has slowly gained a place along with societal concern for more charismatic or iconic species in Washington state. Data collection has gone beyond mere fishery harvest statistics into the realm of definition and mapping of critical habitats. Prior to this period, the shorelines of the Puget Sound Basin, their critical forage fish spawning habitats, and the natural processes forming and maintaining them, were manipulated and modified during the course of Euro-American economic development without regard for either site-specific or cumulative negative impacts. In many urbanized bays and waterways, the original characteristics of the nearshore marine environment are unknown. Today's "baseline" information is clearly of modified conditions.

Although most of the shoreline of the Puget Sound Basin is now privately owned, and a significant proportion is no longer in a natural condition, nearshore processes and ecosystems continue to function to various degrees to maintain marine resources. It is in this context that present-day land-use management, resource investigation, conservation, and restoration initiatives will operate. Our collective knowledge of shoreline processes and ecological functions continues to increase, as does the effort to educate the general public about these functions and resources. Resource conservation policies and regulations are also evolving.

Concern for forage fish stock status and critical-habitat conservation evolved in parallel with more rational management of the Puget Sound ecosystem. There are increasing efforts to disperse forage-fish-related information to the public and other agencies.

In summary, the following points could be emphasized, regarding forage fishes of the Puget Sound Basin:

- Seasonal forage fish spawning and rearing activity is an important ecological feature of a significant proportion of the shoreline and nearshore zone of the Puget Sound Basin.
- Preservation of spawning, rearing, and seasonal/migratory habitats is critical for forage fish stock maintenance.
- Located in the nearshore zone, forage fish spawning habitats are very vulnerable to the effects of shoreline development.
- Significant amounts of forage fish spawning habitat have been degraded or destroyed by the cumulative impacts of shoreline development in the Puget Sound Basin.
- All known forage fish spawning sites are currently protected from net loss by specific language within the state Hydraulic Code Rules, GMS, SMP Guidelines and local CAOs, if applied and enforced.
- Our knowledge of existing forage fish spawning and rearing sites is incomplete, and additional sites continue to be found during on-going survey programs.
- Forage fish habitat conservation cannot depend solely on public habitat acquisition, restoration or mitigation.
- Forage fish habitat conservation will continue to depend on the application of regulations to private property, given the widespread privatization of marine tidelands in Puget Sound.
- Adherence to "private property rights" must be balanced with a new attitude of meaningful stewardship and preservation of the public's forage fishes and their critical habitats.
- The citizens of the Puget Sound Basin are largely unaware of forage fishes and their critical habitats, thus there is a great need for continued public education on these matters.

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# PSNERP and the Nearshore Partnership

The **Puget Sound Nearshore Ecosystem Restoration Project** (PSNERP) was formally initiated as a General Investigation (GI) Feasibility Study in September 2001 through a cost-share agreement between the U.S. Army Corps of Engineers and the State of Washington, represented by the Washington Department of Fish and Wildlife. This agreement describes our joint interests and responsibilities to complete a feasibility study to “... *evaluate significant ecosystem degradation in the Puget Sound Basin; to formulate, evaluate, and screen potential solutions to these problems; and to recommend a series of actions and projects that have a federal interest and are supported by a local entity willing to provide the necessary items of local cooperation.*”

Since that time, PSNERP has attracted considerable attention and support from a diverse group of individuals and organizations interested and involved in improving

the health of Puget Sound nearshore ecosystems and the biological, cultural, and economic resources they support. The **Puget Sound Nearshore Partnership** is the name we have chosen to describe this growing and diverse group and the work we will collectively undertake, which ultimately supports the goals of PSNERP but is beyond the scope of the GI Study. We understand that the mission of PSNERP remains at the core of the Nearshore Partnership. However, restoration projects, information transfer, scientific studies and other activities can and should occur to advance our understanding and, ultimately, the health of the Puget Sound nearshore beyond the original focus and scope of the ongoing GI Study. As of the date of publication for this Technical Report, the Nearshore Partnership enjoys support and participation from the following entities:

King Conservation District	People for Puget Sound	U.S. Department of Energy – Pacific Northwest National Laboratory	Washington Department of Ecology
King County	Pierce County	U.S. Environmental Protection Agency	Washington Department of Fish and Wildlife
Lead Entities	Puget Sound Partnership	U.S. Geological Survey	Washington Department of Natural Resources
National Wildlife Federation	Recreation and Conservation Office	U.S. Fish and Wildlife Service	Washington Public Ports Association
NOAA Fisheries	Salmon Recovery Funding Board	U.S. Navy	Washington Sea Grant
Northwest Indian Fisheries Commission	Taylor Shellfish Company	University of Washington	WRIA 9
Northwest Straits Commission	The Nature Conservancy		
	U.S. Army Corps of Engineers		

Information about the Nearshore Partnership, including the PSNERP work plan, technical reports, the Estuary and Salmon Restoration Program, and other activities, can be found on our Web site at: [www.pugetsoundnearshore.org](http://www.pugetsoundnearshore.org).

# PUGET SOUND NEARSHORE PARTNERSHIP



**RESTORING OUR  
ECOSYSTEM HEALTH**

Puget Sound Nearshore Partnership/  
Puget Sound Nearshore Ecosystem Restoration Project  
c/o Washington Department of Fish and Wildlife

Mailing Address: 600 Capitol Way North,  
Olympia, Washington 98501-1091

Contact: [pugetsoundnearshore@dfw.wa.gov](mailto:pugetsoundnearshore@dfw.wa.gov)  
or visit our website at: [www.pugetsoundnearshore.org](http://www.pugetsoundnearshore.org)



Common Name

PHS on the Web



Layers Tools

Base Maps

PHS Features Found

Location Clicked in LatLong: -122.47497, 47.28073

Common Name	Scientific Name	Priority Area	Display Resolution	Feature Type	Full Record
Coho <a href="#">(show)</a>	Oncorhynchus kisutch	Occurrence/Migratio	AS MAPPED	Line	<a href="#">Show Full Record</a>
Pacific Sand Lance <a href="#">(show)</a>	Ammodytes hexapterus	Breeding Area	AS MAPPED	Line	<a href="#">Show Full Record</a>
Resident Coastal Cutthroat <a href="#">(show)</a>	Oncorhynchus clarki	Occurrence/Migratio	AS MAPPED	Line	<a href="#">Show Full Record</a>
Biodiversity Areas And Corridor <a href="#">(show)</a>	Null	Terrestrial Habitat	AS MAPPED	Area	<a href="#">Show Full Record</a>
Purple martin <a href="#">(show)</a>	Progne subis	Breeding Area	AS MAPPED	Area	<a href="#">Show Full Record</a>
Esturine Zone <a href="#">(show)</a>	Null	Aquatic Habitat	AS MAPPED	Area	<a href="#">Show Full Record</a>

Dismiss

# SOUTHERN RESIDENT KILLER WHALE PRIORITY CHINOOK STOCKS

## Outline of Prey Prioritization Conceptual Model

NOAA and WDFW have developed a framework to identify Chinook salmon stocks that are important to Southern Resident killer whales to assist in prioritizing actions to increase critical prey for the whales. The framework currently includes three factors that contribute to the identification of priority Chinook salmon populations. Note, here “population” could mean management unit, stock, ESU, run, etc. Each of the three factors has a range of scores which affects its weight. For each Chinook population ranging from Southeastern Alaska to California, a total score is calculated by adding up the three individual factor scores. The Chinook salmon populations with the highest total scores are considered the highest priority to increase abundance to benefit the whales. Several sensitivity analyses provided initial help in understanding how the weighting/scoring affects the priority list. The conceptual model, factors, and scoring were reviewed at a workshop sponsored by the National Fish and Wildlife Foundation and modifications were made to incorporate feedback from participants. The factors, scoring and priority list can be adapted as new scientific information becomes available.

The three evaluation factors include:

### **FACTOR 1- Observed Part of SRKW Diet**

Description and data sources: Prey tissues/scales and fecal samples have been collected from 2004 – present (Hanson et al. 2010, Ford et al. 2016, Hanson et al. in prep). From the prey tissues/scales collected, Genetic Stock Identification (GSI) were run to identify the Chinook stocks in the diet. The majority of samples have been collected in the summer months in inland waters of WA and B.C.

#### Assumption

- Chinook populations that have been observed in the diet will have higher priority than those that have not.

**Caveat:** There is currently no spatial correction factor for sample collection (stocks originating from near the sample locations are more likely to be collected), no correction factor for abundance (more abundant stocks are more likely to be identified in the diet), and no correction factor for potential whale selectivity (older, larger fish more likely to be recovered in scale samples).

### **FACTOR 2- Consumed During Reduced Body Condition or Diversified SRKW Diet**

Description and data sources: For the second factor, “Consumed During Reduced Body Condition or Diverse Diet”, stocks consumed during times of potential reduced body condition and increased diet diversity receive additional weight.

Since 2008, NOAA's SWFSC has used aerial photogrammetry to assess the body condition and health of SRKWs, initially in collaboration with the Center for Whale Research and, more recently, with the Vancouver Aquarium and SR<sup>3</sup>. Photogrammetry data has been collected during seven field efforts in five years, including September 2008, 2013, and 2015, and May and September 2016 and 2017 (Durban et al. 2017; Fearnbach et al. 2018). The proportion of Chinook salmon consumed in whales' diet was estimated by season and region (inland vs coastal waters) using the data from prey tissues/scales and fecal samples (Hanson et al. 2010, Ford et al. 2016, Hanson et al. in prep).

### Assumptions

- Reduced body condition and diverse diet occurs from Oct through May.
- Whales switch from preferred prey, Chinook salmon, to other salmonids or prey when Chinook are less available.

### **FACTOR 3- Degree of Spatial and Temporal Overlap**

Description and data sources: Recent prey mapping from Shelton et al. in press (CWT data) was used to assess the overlap in time and space distribution of individual fall Chinook salmon stocks and SRKWs. The distribution/timing of all Chinook salmon stocks across the whales' range from California to Southwest Vancouver Island (and the inland waters of the Salish Sea) was divided into weighted spatial/temporal areas. Currently, Shelton et al. in press includes detailed information on fall runs. Available data for spring Chinook was included, but detailed analyses of data from spring runs are in progress and will be completed in the next two years, incorporating both recoveries in directed Chinook troll fisheries, and Chinook recovered as bycatch in fisheries not targeting Chinook.

For spring run Chinook we relied on reports from the Chinook Technical Committee of the Pacific Salmon Commission (PSC 2018a, 2018b) and published literature (e.g. Satterthwaite et al. 2013, Wahle et al. 1981, Weitkamp 2010) to assign approximate ocean distributions. For stocks with less information, we assumed that the risk to predation was low in seasons and regions that did not correspond to the return timing and origin of each stock (for example, Columbia spring Chinook are assumed to be most available to whales in winter and spring months near the mouth of the Columbia River, but because of their approximate ocean distribution, they are not available in other regions or seasons – particularly mid-summer to fall). Because of limited recoveries, we also assumed that for stocks returning to the Salish Sea (Strait of Georgia, Puget Sound), the distribution was similar in the Salish Sea to Southwest Vancouver Island distributions.

The spatial/temporal Areas currently include: 1) Southwest Vancouver Island (WCVI); 2) Salish Sea; 3) Cape Falcon, Oregon north to British Columbia border; 4) Cape Falcon, OR south to Cape Mendocino (northern California); 5) Cape Mendocino, CA to Point Sur, CA. Seasons are defined as: Spring: April-May; Summer: June-July; Fall: Aug-Oct; Winter: November-March. These areas

reflect the division of Chinook run timing (approximately), correspond to periods of coded wire tag recoveries in fisheries, and correspond to predictable patterns of SRKW movement. SRKW distribution data was assessed from multiple sources (e.g. Center for Whale Research, The Whale Museum, NWFSC satellite tagging, NWFSC coastal hydrophones, coastal spring/winter NWFSC cruises, other opportunistic observations).

### Assumptions

- Chinook salmon stocks that overlap in space and time are potential prey.
- Chinook salmon stocks that have a higher degree of overlap in space and time have a higher priority than stocks that have a relatively lower degree of overlap.
- Weighted spatial/temporal areas accommodate variation in the distribution of SRKW and Chinook salmon

**Caveat-** CWT model interpolates movement of stocks seasonally to account for gaps in fishing effort. Also, the hatchery releases going into the CWT model are not comprehensive, but rather model the distribution of major stock groupings. Within regions and run type (e.g. fall Puget Sound), the ocean distribution is assumed to be the same for all watersheds. Smaller release groups, such as those from the San Juan Islands (SJUA in RMIS) were not included in Shelton et al. because of the low recovery rates – though the ocean distribution of these fish is assumed to be similar to those populations originating from Puget Sound. In particular, ocean distributions of spring run stocks tend to be less well understood than fall stocks. We use the best information available but acknowledge that advances in estimates of ocean distribution of many stocks will improve with the completion of on-going research over the course of the next 1-3 years.

### **Weight and Scoring**

#### FACTOR 1

If the Chinook stock was observed  $\geq 5\%$  of the whales diet in summer or fall/wi/spr, the stock receives 1 point. If it was not observed in the diet, the stock receives 0 points. This prioritizes stocks observed in the diet compared to those that have not been observed.

#### FACTOR 2

Current data indicate that both reduced body condition and a diversified diet occur in non-summer months. If a stock is consumed during October through May, it receives 1 point. If it is consumed during June through September, the stock receives 0 points. This prioritizes stocks that are consumed during periods with a higher likelihood of food limitation or stress in the whales' health.

### FACTOR 3

For each space/time area described above, if more than 25% of the Chinook stock is distributed in that area, the area receives a sub-score of 2. For areas that contain between 5% and 25% of the Chinook stock, the area receives a sub-score of 1. If an area contains less than 5% of the Chinook stock, it receives a sub-score of 0. The sub-scores for each area are multiplied by an importance weight for each area. The final score for the Chinook stock/population is the sum of the products of the scores and weight for each area normalized such that the highest possible score of a given stock is equal to 3.

Here are the seven space/time combinations included in Factor 3 and their associated weights.

1. WA coast in Winter/Spring; weight = 0.5
2. WA coast in Summer/Fall; weight = 0.5
3. Salish Sea in Winter/Spring; weight = 0.5
4. Salish Sea in Summer/Fall; weight = 0.5
5. OR / N.CA coast in Winter/Spring; weight = 0.25
6. CA coast in Winter/Spring ; weight = 0.25
7. West Coast of Vancouver Island in Winter/Spring; weight = 0.5

The Salish Sea and coastal waters off WA have a 0.5 weight. The areas off BC, OR/North CA and CA have a 0.25 weight. This structure means that the areas of highest SRKW use – the Salish Sea and coastal WA – are treated as twice as important as the other areas.

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**Priority Chinook Stocks Using Conceptual Model**

ESU / Stock Group	Run Type	Rivers or Stocks in Group	Diet Contribution Score (0,1)	Killer Whale Reduced Body Condition or Diverse Diet Score (0,1)	Spatio-Temporal Overlap Score (0 - 3)	Total Score (sum of factors)
			Avg. Factor 1 (see note)	Avg. Factor 2 (see note)	Avg. Factor 3	
Northern Puget Sound	Fall	Nooksack, Elwha, Dungeness, Skagit, Stillaguamish, Snohomish	1	1	3.00	5.00
Southern Puget Sound	Fall	Nisqually, Puyallup, Green, Duwamish, Deschutes, Hood Canal systems	1	1	3.00	5.00
Lower Columbia	Fall	Fall Tules and Fall Brights (Cowlitz, Kalama, Clackamas, Lewis, others)	1	1	2.63	4.63
Strait of Georgia	Fall	Lower Strait (Cowichan, Nanaimo), Upper Strait (Klinaklini, Wakeman, others), Fraser (Harrison)	1	1	2.63	4.63
Upper Columbia & Snake Fall	Fall	Upriver Brights	1	1	2.25	4.25
Fraser	Spring	Spring 1.3 (upper Pitt, Birkenhead; Mid & Upper Fraser; North and South Thompson) and Spring 1.2 (Lower Thompson, Louis Creek, Bessette Creek)	1	1	2.25	4.25
Lower Columbia	Spring	Lewis, Cowlitz, Kalama, Big White Salmon	1	1	2.25	4.25
Middle Columbia	Fall	Fall Brights	1	1	2.06	4.06
Snake River	Spring-Summer	Snake, Salmon, Clearwater	1	1	1.88	3.88
Northern Puget Sound	Spring	Nooksack, Elwha, Dungeness, Skagit (Stillaguamish, Snohomish)	1	1	1.88	3.88
Washington Coast	Spring	Hoh, Queets, Quillayute, Grays Harbor	1	1	1.69	3.69
Washington Coast	Fall	Hoh, Queets, Quillayute, Grays Harbor	1	1	1.69	3.69
Central Valley	Spring	Sacramento and tributaries	1	1	1.50	3.50
Middle & Upper Columbia Spring	Spring	Columbia, Yakima, Wenatchee, Methow, Okanagan	1	1	1.31	3.31
Middle & Upper Columbia Summers	Summer		1	1	1.31	3.31

Fraser	Summer	Summer 0.3 (South Thompson & lower Fraser; Shuswap, Adams, Little River, S. Thompson mainstem, Maria Slough in Lower Fraser) and Summer 1.3 (Nechako, Chilko, Quesnel; Clearwater River in North Thompson)	1	0	1.88	2.88
Central Valley	Fall and Late Fall	Sacramento, San Joaquin	1	1	0.75	2.75
Klamath River	Fall	Upper Klamath and Trinity	1	1	0.75	2.75
Klamath River	Spring	Upper Klamath and Trinity	1	1	0.75	2.75
Upper Willamette	Spring	Willamette	0	0	2.25	2.25
Southern Puget Sound	Spring	Nisqually, Puyallup, Green, Duwamish, Deschutes, Hood Canal systems	0	0	1.88	1.88
Central Valley	Winter	Sacramento and tributaries	0	0	1.50	1.50
North & Central Oregon Coast	Fall	Northern (Siuslaw, Nehalem, Siletz) and Central (Coos, Elk, Coquille, Umpqua)	0	0	1.41	1.41
West Coast Vancouver Island	Fall	Robsertson Creek, WCVI Wild	1	0	0.38	1.38
Southern Oregon & Northern California Coastal	Fall	Rogue, Chetco, Smith, lower Klamath	0	0	0.75	0.75
Southern Oregon & Northern California Coastal	Spring	Rogue	0	0	0.75	0.75
California Coastal	Fall	Mad, Eel, Russian	0	0	0.75	0.75
California Coastal	Spring	Mad, Eel, Russian	0	0	0.75	0.75
Southeastern Alaska	Spring	Taku, Situk, Chilkat, Chickamin, Unuk, Alsek, Stikine	0	0	0.00	0.00
Northern BC	Spring	Yakoun, Skeena, Nass	0	0	0.00	0.00
Central BC	mostly Summer	Atnarko, Dean River, Rivers Inlet	0	0	0.00	0.00

Note: Factor 1 and 2 are not literal averages. If a major component of the rivers in the ESU / Stock group had 1 then this was scored a 1. If no major component was scored a 1, this was scored a 0



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**EXECUTIVE ORDER 18-02**

**SOUTHERN RESIDENT KILLER WHALE  
RECOVERY AND TASK FORCE**

**WHEREAS**, Southern Resident Killer Whales (Southern Residents) are an iconic and treasured species in Washington and throughout the Pacific Northwest;

**WHEREAS**, Southern Residents are classified as endangered in Washington and surrounding waters, under the U.S. Endangered Species Act and in Canada under the Species at Risk Act;

**WHEREAS**, the population of Southern Residents has declined, from a high of 98 in 1995, to 76 today, which is the lowest number of Southern Residents in more than three decades. Recent science also indicates that many Southern Residents are in poor condition and are struggling to raise calves;

**WHEREAS**, if Southern Residents were to become extinct, we would suffer an unacceptable loss to our environment, economy, and way of life. We would also lose an essential component of our marine ecosystem and an indicator of the health of our waters;

**WHEREAS**, Southern Residents hold significant cultural value to native tribes and all Washingtonians;

**WHEREAS**, Southern Residents, through the whale watching industry alone, contribute as much as \$60 million to the local economy annually and provide hundreds of jobs to the Puget Sound region;

**WHEREAS**, Southern Residents make their home in Washington's marine waters for a portion of the year, but they are also highly migratory seeking prey along the west coast from Northern California to Southeast Alaska. Therefore, Southern Residents rely on healthy ecosystems and food sources from Washington and throughout the west coast of the United States and Canada;

**WHEREAS**, three primary factors threaten Southern Resident populations: (1) prey availability, (2) legacy and new toxic contaminants, and (3) disturbance from noise and vessel traffic. The health of Southern Residents and Chinook salmon are tightly linked. Recent scientific studies indicate that reduced Chinook salmon runs undermine the potential for the Southern Resident population to successfully reproduce and recover. Both Southern Residents and Chinook salmon populations are adversely impacted by warming oceans and ocean acidification due to climate change. Presence of contaminants and accumulation of pollutants in Washington's waters are

also linked to the decline of Southern Residents. Key sources of contamination in storm water runoff remain to be addressed and the potential for a catastrophic oil spill continues to threaten Southern Residents and the entire ecosystem of Puget Sound. In addition, increased boat and ship traffic has caused greater underwater noise that interferes with Southern Resident critical feeding and communication;

**WHEREAS**, both swift near-term actions and effective long-term actions are necessary to recover these iconic and endangered animals. Essential recovery actions that are described in both United States and Canadian federal plans and federally approved regional plans must be implemented through close coordination with all of our partners including state, local, tribal, and Canadian governmental entities and other private sector partners to be successful;

**NOW THEREFORE, I**, Jay Inslee, Governor of the state of Washington, by virtue of the power vested in me by the Constitution and statutes of the state of Washington do hereby order and direct as follows:

**Implement Immediate Actions to Benefit Southern Resident Killer Whales**

Within existing resources, I ask the following state agencies, in consultation with the appropriate local governments, federal agencies, and tribal governments, to conduct the immediate actions listed below to further the purpose of this Executive Order.

- Washington Department of Fish and Wildlife (WDFW) with review from the Governor’s Salmon Recovery Office (GSRO) and the Puget Sound Partnership (PSP)—By July 31, 2018, identify the highest priority areas and watersheds for Southern Resident prey in order to focus or adjust, as needed, restoration, protection, incentives, hatcheries, harvest levels, and passage policies and programs.
- WDFW and Washington State Parks and Recreation Commission (WSPRC)—By April 30, 2018, develop implementation plans for increased enforcement, outreach and education of vessel regulations as well as enforcement of Chinook fisheries regulations in areas frequented by orcas.
- Washington State Department of Ecology (Ecology)—By April 30, 2018, create a curriculum to improve and increase the number of trainings for vessels in the whale watching industry to become “vessels of opportunity” to assist in the event of an oil spill.
- Washington State Department of Transportation (WSDOT)—By May 31, 2018, develop strategies for quieting state ferries in areas most important to Southern Residents.
- WDFW—By April 30, 2018, review and amend, as needed, 2018 recreational and commercial fishing regulations prioritizing protection of key areas and fish runs for Southern Resident recovery. I will also ask our tribal co-managers, and international and federal fisheries managers to work directly with WDFW and its Commission in developing recommendations for implementing this action.
- WDFW—By April 30, 2018, explore options and develop a proposal to alter fish food used in state hatcheries to limit the amount of Polychlorinated Biphenyls (PCBs) in Southern Resident prey.

- PSP, WDFW, GSRO—By December 15, 2018, demonstrate how Chinook recovery projects benefit Southern Resident recovery, beginning in the 2018 grant round, for the Pacific Coast Salmon Recovery Fund, the Puget Sound Acquisition and Restoration Program, the Estuary and Salmon Restoration program and the Washington Coastal Restoration Initiative.
- PSP, WDFW, GSRO, WSPRC, Washington State Department of Licensing (DOL)—By July 1, 2018, prioritize existing outreach resources to support Southern Resident recovery. Collaborate with the Governor’s Office to develop a public education program and identify needed resources.
- Ecology—By July 31, 2018, develop criteria to prioritize financial assistance beginning in the 2019-21 biennium for storm water projects that benefit Southern Resident recovery.

**Establishment of the Southern Resident Killer Whale Task Force**

A Southern Resident Killer Whale Task Force is hereby created to identify, prioritize, and support the implementation of a longer term action plan needed for the recovery of Southern Residents and necessary to secure a healthy and sustained population for the future. The plan shall include actions needed to make significant progress in addressing all three of the identified threats to Southern Residents. The Task Force should monitor and evaluate the immediate actions undertaken by state agencies and build upon the progress and effectiveness of that work when developing longer term actions. Where available and applicable, the Task Force should build upon existing state, regional and federal plans.

Members of the Task Force will include directors or their senior designees from the Washington Departments of Agriculture, Commerce, Ecology, Health, and Transportation, as well as the Puget Sound Partnership, the Governor’s Office of Indian Affairs, the Recreation and Conservation Office, and the Governor’s Salmon Recovery Office. I also invite the Department of Fish & Wildlife and its Commission, the Department of Natural Resources, and the Washington State Parks and Recreation Commission to participate on the Task Force as members in full.

I will separately invite representatives of appropriate federal, tribal, and local governments, the private sector and the non-profit sector, to participate in the Task Force. I will invite each Washington legislative caucus to appoint a member to participate in the Task Force.

I shall appoint co-chairs and convene the Southern Resident Killer Whale Task Force (Task Force) beginning in April 2018.

The Task Force shall work with all levels of government and other partners to identify needed policies and programs, recommend priority actions to support recovery efforts, highlight budget needs, and recommend any legislation needed to support this Executive Order. The Task Force shall coordinate their work with appropriate representatives of the Government of Canada, the Province of British Columbia, and the states of Oregon, California, Idaho, and Alaska.

The Task Force shall prepare a comprehensive report and recommendations for recovering Southern Residents, with a full draft due by October 1, 2018, and a final report by November 1, 2018. The report should detail ongoing and new actions that will address all of the major threats

to Southern Residents, including prey availability, legacy and ongoing toxic contaminants, and disturbance from noise and vessel traffic. A second report outlining the progress made, lessons learned, and outstanding needs shall be completed by October 1, 2019. With the submission of its second report, the Task Force shall dissolve.

I direct the Puget Sound Partnership and ask the Department of Fish and Wildlife to organize the necessary agency experts and staff to support the work of the Task Force. The Governor's Policy Office and the Office of Financial Management will provide assistance and guidance to the lead agencies as needed to ensure the success of the Task Force.

The Governor's Office will work with both the State Legislature and State Congressional delegation to solicit their early and ongoing advice and guidance.

The Southern Resident Killer Whale Task Force shall conduct its business in an open, transparent manner, and its meetings will be open to the public.

Signed and sealed with the official seal of the state of Washington on this 14th day of March, 2018, at Olympia, Washington.

By:

/s/

---

Jay Inslee  
Governor

BY THE GOVERNOR:

/s/

---

Secretary of State

RELATIVE SEA LEVEL PROJECTIONS FOR THE COASTAL AREA NEAR: 47.3N, 122.5W

This table was generated on 07/18/18 for the Washington Coastal Resilience Project

For more information on the Washington Coastal Resilience Project and these projections go to [www.coastalnetwork.com/wcrp-documents.html](http://www.coastalnetwork.com/wcrp-documents.html)

Vertical land movement estimate and uncertainty (1 standard deviation) for this location:  $-0.2 \pm 0.3$  feet/century (negative values represent subsidence)

In the event of a subduction zone earthquake some parts of the Washington coast may be subject to land level change

Based on multiple seismic deformation models, in the event of a subduction zone earthquake this area may be subject to land level change of:

0.0 to -0.2 ft

where negative values represent land level fall, or subsidence. Coastal subsidence during a subduction zone earthquake would have the affect of RAISING local relative sea level  
Sea level rise planning efforts may benefit from taking this into account

RELATIVE SEA LEVEL PROJECTIONS FOR RCP 4.5 FOR THE COASTAL AREA NEAR: 47.3N, 122.5W  
 For more information about these projections go to [www.coastalnetwork.com/wcrp-documents.html](http://www.coastalnetwork.com/wcrp-documents.html)

Table 1: Projected average sea level magnitudes, in feet, for different assessed likelihoods and time periods

19 year period centere	Assessed Probability of Exceedance:									
	99	95	90	83	50	17	10	5	1	0.1
2010	0	0	0	0	0.1	0.2	0.2	0.2	0.2	0.3
2020	0	0.1	0.1	0.1	0.2	0.3	0.3	0.4	0.5	0.5
2030	0.1	0.2	0.2	0.2	0.4	0.5	0.5	0.6	0.7	0.8
2040	0.1	0.2	0.3	0.4	0.5	0.7	0.8	0.9	1	1.3
2050	0.2	0.3	0.4	0.5	0.7	1	1.1	1.2	1.4	2
2060	0.2	0.4	0.5	0.6	0.9	1.2	1.4	1.5	1.8	2.8
2070	0.3	0.5	0.7	0.8	1.1	1.5	1.7	1.9	2.4	3.7
2080	0.3	0.6	0.8	0.9	1.4	1.8	2	2.2	3	5
2090	0.3	0.7	0.9	1.1	1.6	2.1	2.4	2.7	3.6	6.2
2100	0.4	0.8	1	1.2	1.8	2.5	2.8	3.1	4.4	7.6
2110	0.4	0.8	1.1	1.3	2	2.8	3.1	3.6	5.1	9
2120	0.4	0.9	1.2	1.4	2.2	3.1	3.5	4.1	6	10.7
2130	0.4	1	1.3	1.5	2.4	3.5	3.9	4.6	6.9	12.6
2140	0.3	0.9	1.3	1.6	2.6	3.8	4.3	5.1	7.8	14.5
2150	0.3	1	1.3	1.7	2.8	4.2	4.8	5.7	8.9	16.9

Table 2: Assessed likelihood (in percentages) of sea level reaching or exceeding a threshold for different sea levels and dates

19 year period centere	Average Sea Level Magnitudes in Feet Relative to 1991-2009 Average													
	0	0.5	1	1.5	2	2.5	3	4	5	6	7	8	9	10
2010	96	0	0	0	0	0	0	0	0	0	0	0	0	0
2020	99	0	0	0	0	0	0	0	0	0	0	0	0	0
2030	100	18	0	0	0	0	0	0	0	0	0	0	0	0
2040	100	59	1	0	0	0	0	0	0	0	0	0	0	0
2050	100	83	15	1	0	0	0	0	0	0	0	0	0	0
2060	100	92	41	5	1	0	0	0	0	0	0	0	0	0
2070	100	96	65	19	3	1	0	0	0	0	0	0	0	0
2080	100	97	78	38	10	3	1	0	0	0	0	0	0	0
2090	100	98	86	55	23	7	2	1	0	0	0	0	0	0
2100	100	98	90	68	38	16	6	1	1	0	0	0	0	0
2110	100	99	92	76	51	27	12	3	1	1	0	0	0	0
2120	100	99	94	81	60	37	20	5	2	1	1	0	0	0
2130	100	99	94	84	67	47	29	9	4	2	1	1	0	0
2140	100	98	94	85	72	54	37	14	6	3	1	1	1	0
2150	100	98	95	87	75	60	45	20	8	4	2	1	1	1

RELATIVE SEA LEVEL PROJECTIONS FOR RCP 8.5 FOR THE COASTAL AREA NEAR: 47.3N, 122.5W  
 For more information about these projections go to [www.coastalnetwork.com/wcrp-documents.html](http://www.coastalnetwork.com/wcrp-documents.html)

Table 1: Projected average sea level magnitudes, in feet, for different assessed likelihoods and time periods

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2010	0	0	0	0	0.1	0.2	0.2	0.2	0.2	0.3
2020	0	0.1	0.1	0.1	0.2	0.3	0.3	0.4	0.4	0.5
2030	0.1	0.2	0.2	0.3	0.4	0.5	0.5	0.6	0.7	0.8
2040	0.1	0.3	0.3	0.4	0.6	0.7	0.8	0.9	1	1.3
2050	0.2	0.4	0.5	0.5	0.8	1	1.1	1.2	1.5	2.1
2060	0.3	0.5	0.6	0.7	1	1.3	1.5	1.6	2	3
2070	0.4	0.7	0.8	0.9	1.3	1.7	1.9	2	2.6	4.2
2080	0.5	0.8	1	1.1	1.6	2.1	2.3	2.6	3.3	5.4
2090	0.6	1	1.2	1.3	1.9	2.5	2.8	3.1	4.1	6.8
2100	0.7	1.1	1.4	1.6	2.3	3	3.3	3.7	5.1	8.6
2110	0.9	1.3	1.5	1.7	2.4	3.2	3.6	4.1	5.7	10
2120	1	1.5	1.7	2	2.8	3.7	4.1	4.8	6.8	11.8
2130	1.1	1.6	1.9	2.2	3.1	4.2	4.7	5.5	7.9	14
2140	1.2	1.7	2.1	2.4	3.4	4.7	5.3	6.2	9	16.3
2150	1.2	1.8	2.2	2.6	3.8	5.3	6	7	10.3	18.5

Table 2: Assessed likelihood (in percentages) of sea level reaching or exceeding a threshold for different sea levels and dates

19 year period centere	Average Sea Level Magnitudes in Feet Relative to 1991-2009 Average													
	0	0.5	1	1.5	2	2.5	3	4	5	6	7	8	9	10
2010	95	0	0	0	0	0	0	0	0	0	0	0	0	0
2020	99	0	0	0	0	0	0	0	0	0	0	0	0	0
2030	100	16	0	0	0	0	0	0	0	0	0	0	0	0
2040	100	62	1	0	0	0	0	0	0	0	0	0	0	0
2050	100	87	20	1	0	0	0	0	0	0	0	0	0	0
2060	100	96	53	8	1	0	0	0	0	0	0	0	0	0
2070	100	98	78	31	6	1	0	0	0	0	0	0	0	0
2080	100	99	90	58	22	6	2	0	0	0	0	0	0	0
2090	100	99	94	75	43	18	6	1	0	0	0	0	0	0
2100	100	100	97	86	64	38	18	3	1	0	0	0	0	0
2110	100	100	98	90	71	45	24	6	2	1	0	0	0	0
2120	100	100	99	94	82	62	40	12	4	2	1	1	0	0
2130	100	100	99	96	87	72	53	21	8	3	2	1	1	0
2140	100	100	99	97	91	80	64	32	13	6	3	2	1	1
2150	100	100	99	98	93	85	72	44	21	10	5	3	2	1

**From:** Teresa Vanderburg [mailto:TVanderburg@esassoc.com]  
**Sent:** Monday, April 15, 2019 11:34 AM  
**To:** Van Zwalenburg, Kim (ECY) <kvan461@ECY.WA.GOV>; Barnett, Elliott <elliott.barnett@ci.tacoma.wa.us>  
**Cc:** Atkinson, Stephen <satkinson@ci.tacoma.wa.us>  
**Subject:** RE: Ecology review and comments on Tacoma SMP updates part 2

Hi Kim, Thank you for pointing out how to access that. I'll do a cross-check with both ordinances.  
Sorry to miss seeing you!

Teresa

**From:** Van Zwalenburg, Kim (ECY) <kvan461@ECY.WA.GOV>  
**Sent:** Monday, April 15, 2019 10:36 AM  
**To:** Teresa Vanderburg <TVanderburg@esassoc.com>; Barnett, Elliott <elliott.barnett@ci.tacoma.wa.us>  
**Cc:** Atkinson, Stephen <satkinson@ci.tacoma.wa.us>  
**Subject:** RE: Ecology review and comments on Tacoma SMP updates part 2

Hi Teresa – I'm sorry we will be missing each other again, but I hope your trip goes well.

The online version is not current but there is a link there which takes you to the changes which haven't been integrated (see below). If you click on **Ord. 2013-45s4**, it will show all the edits which were approved. Not sure when this will get it finished. It does say: "**Amended**" marks sections affected by uncodified ordinances. I don't know if they are waiting on the appeal to be done or if there is another reason this hasn't been completed. They have also not codified 2018-57s (which amended Ord. 2013-45s4 but made no changes to the Erosion Hazard provisions). The county wrapped up their decisions on the SMP and associated CAO changes in October 2018. Hope that explanation makes sense. Kim

FLOOD HAZARD AREAS	
+ <input type="checkbox"/>	Chapter 18E.70 FLOOD HAZARD AREAS <a href="#">Revised 3/18</a>
+ <input type="checkbox"/>	Chapter 18E.80 LANDSLIDE HAZARD AREAS
+ <input type="checkbox"/>	Chapter 18E.90 SEISMIC (EARTHQUAKE) HAZARD AREAS
+ <input type="checkbox"/>	Chapter 18E.100 MINE HAZARD AREAS
+ <input type="checkbox"/>	Chapter 18E.110 EROSION HAZARD AREAS <a href="#">Amended</a>
+ <input type="checkbox"/>	Chapter 18E.120 GRAPHS AND FIGURES FOR TITLE 18E <a href="#">Revised 5/17</a>
+ <input type="checkbox"/>	Title 18F Development Regulations – Land Divisions and Boundary Changes <a href="#">Revised 12/18</a>
+ <input type="checkbox"/>	Title 18G Development Regulations – Conservation Programs <a href="#">Revised 3/18</a>
+ <input type="checkbox"/>	Title 18H Development Regulations – Forest Practices <a href="#">Revised 12/18 Amended</a>
+ <input type="checkbox"/>	Title 18I Development Regulations – Natural Resource Lands <a href="#">Revised 3/18</a>
+ <input type="checkbox"/>	Title 18J Development Regulations – Design Standards and Guidelines <a href="#">Revised 12/18 Amended</a>
- <input type="checkbox"/>	Title 18S Development Policies and Regulations – Shorelines

FLOOD HAZARD AREAS

D. **Soil Erosion Hazard Area Review.** Soil erosion hazard areas shall be reviewed pursuant to the requirements set forth in Title 17A PCC, Construction and Infrastructure Regulations – Site Development and Stormwater Drainage. (Ord. [2006-103s](#) § 2 (part), 2006; Ord. [2004-56s](#) § 4 (part), 2004)

**18E.110.040 Erosion Hazard Area Standards.** [Amended Ord 2013-45s4](#)



A. **Active Shoreline Erosion Hazard Areas.** Any development, encroachment, filling, clearing, or grading, timber harvest, building structures, impervious surfaces, and vegetation removal shall be prohibited within active shoreline erosion hazard areas and associated buffers except as specified in the following standards:

1. Shoreline Erosion Protection Measures. Shoreline erosion protection measures located within or adjacent to freshwater or marine shorelines shall be allowed subject to the following:
  - a. The proposed shoreline protection measure shall comply with the standards set forth in PCC [18E.40.040](#).
  - b. A geological assessment-shoreline erosion geotechnical report has been conducted in accordance with the provisions set forth in PCC [18E.110.030](#) B. that indicates that the shoreline is currently experiencing active erosion (i.e., land retreat or regression).
  - c. The use of the shoreline erosion protection measure will not cause a significant adverse impact on adjacent properties (i.e., increase erosion on adjacent properties).
  - d. The use of the shoreline erosion protection measure will not cause a significant adverse impact on critical fish and wildlife species and their associated habitat (i.e., eliminate or reduce sediment supply from feeder bluffs).
  - e. The use of soft armoring techniques (soil bioengineering erosion control measures as identified in the State Department of Ecology and the Department of Fish and Wildlife guidance) is the preferred method for shoreline protection.

**From:** Teresa Vanderburg [<mailto:TVanderburg@esassoc.com>]  
**Sent:** Friday, April 12, 2019 9:50 AM  
**To:** Barnett, Elliott <[elliott.barnett@ci.tacoma.wa.us](mailto:elliott.barnett@ci.tacoma.wa.us)>; Van Zwalenburg, Kim (ECY) <[kvan461@ECY.WA.GOV](mailto:kvan461@ECY.WA.GOV)>  
**Cc:** Atkinson, Stephen <[satkinson@ci.tacoma.wa.us](mailto:satkinson@ci.tacoma.wa.us)>  
**Subject:** RE: Ecology review and comments on Tacoma SMP updates part 2

Hi Kim,

We've made the changes you requested to the February and March versions of the Draft SMP. Thanks much for your review! As a follow-up, I would like to find out if you have access to the most current copy of the Pierce County Geological Hazardous Areas code since you mentioned that the on-line version is not current. We need to do one last final double-check to make sure we're 100% square. Can you provide?

Elliott is aware I will be traveling on May 15<sup>th</sup> (returning from Colorado) and won't be able to attend the Joint Public Hearing. I'm sorry to miss it, so if there are any questions in advance about what we had prepared, please feel free to ask.

Thank you,

Teresa

**From:** Barnett, Elliott <[elliott.barnett@ci.tacoma.wa.us](mailto:elliott.barnett@ci.tacoma.wa.us)>  
**Sent:** Tuesday, March 19, 2019 4:06 PM  
**To:** Van Zwalenburg, Kim (ECY) <[kvan461@ECY.WA.GOV](mailto:kvan461@ECY.WA.GOV)>  
**Cc:** Atkinson, Stephen <[satkinson@ci.tacoma.wa.us](mailto:satkinson@ci.tacoma.wa.us)>; Teresa Vanderburg <[TVanderburg@esassoc.com](mailto:TVanderburg@esassoc.com)>  
**Subject:** RE: Ecology review and comments on Tacoma SMP updates part 2

Thank you very much Kim! We will discuss your comments and may have some questions...

Elliott Barnett, Senior Planner  
747 Market Street, Room 345  
Tacoma, WA 98402  
(253) 591-5389  
[www.cityoftacoma.org/planning](http://www.cityoftacoma.org/planning)

**From:** Van Zwalenburg, Kim (ECY) [<mailto:kvan461@ECY.WA.GOV>]  
**Sent:** Tuesday, March 19, 2019 3:46 PM  
**To:** Barnett, Elliott <[elliott.barnett@ci.tacoma.wa.us](mailto:elliott.barnett@ci.tacoma.wa.us)>  
**Cc:** Atkinson, Stephen <[satkinson@ci.tacoma.wa.us](mailto:satkinson@ci.tacoma.wa.us)>  
**Subject:** Ecology review and comments on Tacoma SMP updates part 2

Good afternoon Elliott:

Thank you for the opportunity to review the remainder of the city's proposed revisions related to your SMP Periodic Review. These comments focus on the draft SMP changes, received on 3/18/2019.

1. **Section 2.5 Non-conforming Uses and Development** – The most recent changes make sense. I have no further comment at this time.

2. **Section 6.4.7 Geologically Hazardous Areas** – As a general comment, it appears the city relies in part on Pierce County’s critical area provisions for geologically hazardous areas. If this is the case, I recommend you review their code again, which was amended via Ordinance 2013-45s4. It appears that the amendments are acknowledged in their online code but the changes have not yet been fully integrated. This is particularly important when looking at shoreline erosion hazard area standards.

- (B)(1)(a)(i) appears to be incomplete as it states “Existing item in Section 13.10.6.4.7(B)(1)(b).”
- (D)(1)(c) and (d) both contain the phrase “whichever is greater”. It’s unclear what this refers to in either provision. In addition, (c) is an incomplete sentence.

c. The new accessory structure less than 1,000 square feet of floor area, whichever is greater for existing residences;

d. Addition to existing residences, including decks that have a maximum 250 square feet footprint of building, deck or roof area, whichever is greater, and are not closer to the top or toe of the slope than the existing residence;

- (E)(1) appears to have a formatting error. I recommend (1)(c) become (b)(iv) as it addresses those circumstances when structural stabilization might be allowed. Alternatively, it should be revised to say “~~Under such circumstances, the s~~tabilization measures shall conform...”
- (F)(9)(i)(6)(b) which allows hard armoring if “the buildability of an undeveloped site will be threatened with the next 10 years if a hard armoring method of shoreline erosion protection is not provided” is inconsistent with WAC 173-26-231(3)(a)(iii)(B) and also with the provisions in TSMP Chapter 8 (see 8.2.2 (A)(8)). This provision was struck from the Pierce County code for geologically hazardous areas with the adoption of Ordinance 2013-45s4.

The following appear to be typographical errors:

- (B)(1)(a)(ii) in the first line: Areas with active bluff retreat that exhibits continuing calving...
- (B)(1)(b) in the second line: ...through the geological assessment process are identified as susceptible...
- (C)(2)(a) in the first line: The buffer width shall be measured on a horizontal ~~place~~ plane from a perpendicular line...
- (F)(d) in the last line: ...increased disturbance as compared to use of retaining walls;
- (F)(3) in the third line: ...Terracing of the land; however, shall be kept...
- (K)(6) in the first line: Any modification complies with recommendations of the geotechnical ~~support~~ report with respect...

3. **Section 6.6 Vegetation Conservation** – I concur with your proposed revisions and have no comments.

I am happy to answer any questions.

Kim

Kim Van Zwalenburg  
Department of Ecology  
SEA/SWRO, Senior Shoreline Planner  
360-407-6520

**INTEROFFICE MEMORANDUM  
CITY OF TACOMA**

**TO:** Elliott Barnett, Senior Planner

**FROM:** Steve Victor, Deputy City Attorney

**SUBJECT:** 2019 Tacoma Shoreline Master Program Review – RCW 36.70A.370 Memo

**DATE:** April 10, 2019

Per your request, provided below is a legal review of the draft updated regulations resulting from the 2019 Tacoma Shoreline Master Program Review in the context of RCW 36.70A.370 which requires local governments to implement a process to prevent proposed regulatory or administrative actions from resulting in an unconstitutional taking of private property. In performing my legal analysis, I follow the guidance of the Washington State Attorney General (“AGO”) set out in the AGO’s 2015 “Avoiding Unconstitutional Takings of Private Property” Memorandum.

In addition, I must emphasize the limitations of the legal review. The law of takings relies primarily on an analysis of three underlying factors: 1. The requirements of planning policies, including mandatory GMA policies and locally adopted policies; 2. Alternatives to proposed or adopted plans that may have less impact on private property, but still achieve the policy goals; 3. Economic impacts of the proposed or adopted plans. The effectiveness of this legal review is wholly dependent on the substantive data on the above-referenced factors that is included in the draft documents.

***1. Does the Regulatory Action Result in a Permanent or Temporary Physical Occupation of Private Property?***

This review noted no data in the draft regulations that indicated they would result in a permanent physical occupation of all or a portion of private property within the area of effect.

***2. Does the Regulatory Action Deprive the Owner of All Economically Viable Uses of the Property?***

This review noted no data in the draft regulations that indicated they would result in permanently eliminating all economically viable or beneficial uses of any private property within the area of effect.

***3. Does the Regulatory Action Deny or Substantially Diminish a Fundamental Attribute of Property Ownership?***

This review noted no data in the draft regulations that indicated they would result in denial of a property owner's ability to exercise a fundamental attribute of property ownership on any private property within the area of effect.

***4. Does the Regulatory Action Require a Property Owner to Dedicate a Portion of Property, to Grant an Easement, or to Undertake Some Independent Financial Obligation?***

This review noted no data in the draft regulations that indicated they would result in requiring a property owner to dedicate a portion of the property, to grant an easement, or to undertake some independent financial obligation within the area of effect.

***5. Does the Regulatory Action Have a Severe Impact on the Landowner's Economic Interest?***

This review noted no data in the draft regulations that indicated they would have a severe impact on the landowner's economic interest within the area of effect.

Please advise if you have further questions.

## Tacoma 2019 SMP Periodic Review - Salmon Beach stakeholders Q & A

The following questions were discussed at the March 27, 2019 community meeting with members of the Salmon Beach community. City staff have endeavored to provide straightforward responses to these sometimes technical and complex topics. We are also awaiting comments from other public agencies with purview on these matters.

### What modifications and expansions are permitted currently to nonconforming structures and uses under the Tacoma Shoreline Master Program (TSMP), and what changes are proposed?

TSMP Section 2.5.B Nonconforming Structures currently permits the following:

- A nonconforming structure damaged by fire, flood, explosion or other natural disaster may be restored or reconstructed, with certain restrictions.
- A nonconforming structure with a nonconforming use may see a one-time, minor expansion up to 10% of square footage, provided the expansion does not increase the overall height.

The proposal would add the following to TSMP Section 2.5.B:

- Nonconforming single-family, overwater structures may be expanded to increase height to 25 feet from deck level, provided the following:
  - The structure meets Base Flood Elevation requirements;
  - There is no net loss of ecological functions; and,
  - The outcome reduces risk from geological hazards.

### Are overwater structures technically located in a floodway or floodplain subject to FEMA standards?

Overwater structures are technically located within the floodway. The National Flood Insurance Program defines the floodway as the channel or other watercourse and the adjacent land areas that must be reserved in order to discharge the base flood without cumulatively increasing the water surface elevation more than a designated height. – *FEMA SI/SD Desk Reference, May 2010.*

FEMA also regulates watercourses including coastal waters. Salmon Beach is within an area designated as a VE zone and the BFE reflects, in-part, flooding from wave action.

### Doesn't the Building Code already require structures to meet Base Flood Elevations requirements with substantial alterations? If so is it necessary to specify that requirement again for nonconforming, overwater single-family structures?

The Building Code requires structures to meet BFE standards for Substantial Improvements, as defined by FEMA:

**Substantial improvement** means any reconstruction, rehabilitation, addition, or other improvement of a structure, the cost of which equals or exceeds 50 percent of the market value of the structure (or smaller percentage as established by the community) before the "start of construction," regardless of the actual repair work performed. – *FEMA SI/SD Desk Reference, May 2010.*

The proposed code adds a further flexibility by allowing for a second-story addition which is currently prohibited. However, second-story additions would not necessarily meet the **Substantial Improvement** definition. This would create the circumstance that a second-story addition would allow for more

occupancy and thus more risk to life and property, without an improvement in safety by coming into compliance with BFE.

The City is awaiting official comments from FEMA on these proposals.

**Is there a more flexible approach possible for Salmon Beach (e.g., only require meeting BFE with “substantial development”)?**

Staff are not aware of a more flexible approach that would adequately address the multiple overlapping environmental and safety issues.

**How does valuation get measured?**

Tacoma’s Building Code references the International Code Council Building Valuation table which contain the accepted methodology for determining valuation of construction activities. It applies to the structure.

**How was 25 feet height arrived at for the proposed height increase?**

25 feet was determined as a straightforward method to for the City to use in regulating proposed second-story additions. While the general height limitation in shorelines is 35 feet, 25 feet measured from deck level is generally adequate for two story structures.

**What about existing cabins that have moved out away from the slope? Would they get credit in terms of the geological hazard review?**

This could be considered in the geotechnical engineer’s analysis of safe distance from the toe of the slope. Risk is going to be evaluated individually based on the geo tech analysis. Risk varies depending on the specific location along the slope and the conditions at that location. Because the slope stability is variable, so would the mitigation requirements.

However, under the proposal each cabin would still need to raise the structure to meet the BFE.

**The proposal would suggest moving structures up and out, which would pose challenges and cost to construction. What building materials/approaches would be appropriate?**

Any new construction will be required to comply with FEMA requirements for protection against wave action. There are FEMA guidance documents available for overwater construction.

**Can the policy/intent language recognizing Salmon Beach be strengthened and would that provide additional flexibility?**

The proposal as drafted adds policy language to support the ongoing continuation of Salmon Beach. Flexibility beyond the minimum required for preferred uses would not be consistent with the Shoreline

Management Act and other applicable policies to reduce risk to life and property and protect the environment.

**Is there any plan, or are there precedents, for the City to proactively require existing overwater structures to be lifted to meet Base Flood Elevation requirements?**

No, not to staff's knowledge.

**How does the Small Projects Waiver connect with the proposed nonconforming structures modifications? Do they work together?**

No. The small project waiver (in the geologically hazardous code) applies to legally established nonconforming structures and uses. However, it is limited to proposals that do not occur within any other critical areas. Salmon Beach occurs within additional critical areas including FWHCA-marine waters and floodplain areas.

**Would it be possible to conduct geological hazard studies for a larger area, perhaps for the whole beach, rather than for individual sites, and how long would such a study be valid?**

Yes, within certain limitations and with City review and concurrence. This study would be valid so long as geotechnical conditions don't change. The City would likely require an addendum from the geo tech to this area-wide geo hazard study for each individual site.

**Why require a geological study if the conclusion is already known – that Salmon Beach is within a geological hazard area?**

There are variations in the degree of hazard based on the specific location. These can be utilized to determine methods to reduce the hazard along with development activities. Factors that vary by specific site include how imminent the danger is, how far the slope runout would be, the risk of future slides, risk of erosion at the base and other variables. The geology and conditions are not uniform along the slope.

**Why require a geo study for an expansion that does not affect the slope in any way?**

The purpose is to determine the degree of risk and identify methods to reduce that risk in association with construction that could increase occupancy and put more structures and lives in harm's way.

**Are there any building design features that could potentially increase safety in this circumstance, or is the only possible improvement to move further from the slope?**

Potentially. Generally, a stronger structure would be more resilient. However, there is no construction method that could fully mitigate the risk. Staff also note that in this location the policy framework limits any increase in impacts on environmental functions from methods such as armoring the slope.

**Should the geo hazard test be “no less safe” rather than “safer”?**

It is the City’s responsibility under the SMA, Building Code and other statutes to protect life and property. In the circumstance that additional occupancy is being proposed in a potentially dangerous location, staff interpret this as requiring an improvement in safety.

**Is there some legal mechanism to release the City from liability and allow Salmon beach residents to hold the City harmless in the event of property damage or physical harm/loss of life?**

We do not believe there is a viable approach to waiving the City’s responsibility to protect life and property.

**After the 2001 earthquake, the federal government sought to “get rid of” Salmon Beach but the City stood by the community then.**

The City has a long history of seeking to balance the conflicting goals of supporting the Salmon Beach community and fulfilling its responsibilities to protect life and property. However, staff note that these issues are largely out of the City’s hands to resolve. Multiple other requirements and reviewing agencies have jurisdiction over this matter.

**This proposal seems to be infeasible or highly difficult and costly. Can it be modified in some way to be more feasible?**

Because of the multiple, overlapping environmental constraints, and based on applicable legal requirements, staff are not aware of a more flexible or feasible approach that would adequately fulfill the City’s responsibility to protect life, property and the environment. Staff note that some jurisdictions would not allow any expansion of structures under this scenario. Furthermore, the requirement to demonstrate that development, including additions to structures, meets the critical area, geological hazards, and floodplain/FEMA standards is required for any development in or adjacent to these critical areas, including those with preferred uses.





**To:** Planning Commission  
**From:** Elliott Barnett, Senior Planner  
**Subject:** **Affordable Housing Action Strategy – Planning Actions**  
**Meeting Date:** May 29, 2019  
**Memo Date:** May 23, 2019

**Action Requested:**

Review public comments and provide staff direction on any modifications.

**Discussion:**

On May 29, 2019 staff will summarize public comments received on the proposed Housing Element updates to incorporate the Affordable Housing Action Strategy. Staff have prepared an Issues and Recommendations summary table, which identifies potential modifications the Commission could consider in response to the comments. Staff will request guidance on those and any other remaining issues, pursuant to preparing a final version of the updates for recommendation to the City Council at the June 19, 2019 meeting.

In addition, staff will request input from the Commission regarding implementation steps for the AHAS planning actions. The AHAS Actions summary table is attached. In addition, the City Council has identified the following 11 actions as priorities for implementation (the two most relevant to the Planning Commission's work are in **bold**):

**Action 1.2 Inclusionary Zoning**

Action 1.3 Multifamily Tax Exemption

Action 1.6 Public Investment/Capital Projects

**Action 1.8 Diverse Housing Types**

Action 1.9 Housing Trust Fund

Action 1.12 Permit Review

Action 2.1 Addressing Derelict Properties

Action 2.3 Resources for Owner Occupied Homes

Action 3.1 Tenant Protection

Action 3.2 Resources for Housing Crisis

Action 4.1 Rental Assistance

**Project Summary:**

This proposed amendment would formally recognize the Affordable Housing Action Strategy as an implementation element of the One Tacoma Comprehensive Plan. The AHAS is a strategic response to a changing housing market, increasing displacement pressure, and a widespread need for high-quality, affordable housing opportunities for all. The strategy was developed in 2018 through a series of community listening sessions, focus groups, input from community partners, market studies, and review of past housing strategies. The AHAS is intended to guide the City's affordable housing strategies, program development, and investments over the next 10 years.

The Comprehensive Plan Housing Element is the City's principal policy statement on housing. The proposed amendment to the Housing Element would update housing data and policies to



reflect the changing housing market, and integrate the AHAS as the City's strategy to fully implement the policies of the Housing Element.

**Prior Actions:**

- September 25, 2018 – City Council received the AHAS ([www.cityoftacoma.org/housing](http://www.cityoftacoma.org/housing)).
- September 26, 2018 – Commission incorporated this review into the 2019 Work Program.
- December 5, 2018 – Commission provided initial direction on the scope of work.
- February 6, 2019 – Commission provided comments on initial proposed draft changes.
- March 6, 2019 – Commission authorized release of draft for public review.
- May 15, 2019—Commission heard public testimony on proposals.

**Staff Contact:**

Elliott Barnett, Senior Planner – (253) 591-5389, [elliott.barnett@cityoftacoma.org](mailto:elliott.barnett@cityoftacoma.org).

**Attachments:**

1. Issues and Recommendations summary table
2. Exhibit A: Oral testimony
3. Exhibit B: Written testimony
4. AHAS actions table and initial City Council priorities

c: Peter Huffman, Director



## Public Comments and Staff Responses and Suggestions

2019 Amendments to the Comprehensive Plan and Land Use Regulatory Code

Key	Comment	Commenters	Staff Response
<b>Application: Affordable Housing Action Strategy – Planning Actions</b>			
1.	Support for the proposed updates to integrate and reflect the AHAS in the Housing Element.	Atkinson; Cannon; Laslie; Malo (Leslie); Nichols (Futurewise); Pow (TPCHD); Read; Ward	Support noted.
2.	Support for integrating AHAS in Housing Element, with emphasis on Homelessness (AHAS 1.5), coordination of resources (AHAS 1.6), and diverse housing types (AHAS 1.8). Promote homeownership.	Gauthier (Habitat for Humanity)	Support noted.
3.	Concerns regarding the “Missing Middle” concept, arguing that zoning has not limited development significantly, and suggesting a “one size fits all” approach is problematic.	Brooker (Historic Tacoma)	<p>Staff note that there is a substantial body of policy analysis establishing that there is a linkage between zoning and housing choice/affordability. The comments make assumptions that bear further consideration. For example, the argument seems to make an assumption that once development has occurred, no further change would occur. In a mature urban setting, redevelopment and infill should reasonably be expected to some extent.</p> <p>Staff fully concur with the broader point that further data and analysis, as well as broad public engagement, is needed in order to foster a shared understanding of these issues.</p> <p><b>The Planning Commission could consider making recommendations to the City Council calling for broad, data-supported community engagement on AHAS Action 1.8 Diverse Housing Types.</b></p>

Key	Comment	Commenters	Staff Response
4.	Promote use of tax incentives for green building and energy efficiency.	Cannon; Laslie	These concepts could be integrated as part of the community discussion of AHAS Action 1.8 Diverse Housing types, among other AHAS actions.
5.	In implementing AHAS actions, careful consideration is needed of what people want, the cost in public resources, and of potential impacts such as traffic, parking and historic character.	Cannon; Jensen; Malo (Nick)	Staff concur.  <b>The Planning Commission could consider providing recommendations to the City Council regarding implementation of the AHAS planning actions.</b>
6.	Include tools such as historic design review, adequate parking, owner occupancy for ADUs, no tax breaks for developers.	Jensen	These concepts could be considered as part of the community discussion of AHAS implementation steps.
7.	Address the link between housing and transportation costs more explicitly.	Cannon; Laslie; Nichols (Futurewise); Pow (TPCHD); Read	The Housing Element, and other elements, already contain policies recognizing the transportation/ housing link, and calling for actions to reduce cost burden through improved access to transportation choices.  <b>Staff will review current policies to identify opportunities to strengthen this linkage.</b>
8.	Curtail further waterfront development on Commencement Bay, protect natural environment and greenways, prevent sprawl.	Cannon; Laslie	Comments noted.
9.	The Housing Element should more explicitly recognize the historic inequities of redlining, exclusionary zoning and restrictive covenants and include stronger policies to ensure communities of color and other residents that have been excluded will benefit from new housing policies.	Howard; Nichols (Futurewise); Menzies	The Housing Element, particularly with incorporation of the Equity Index (labeled as Opportunity Index in the Housing Element), includes strong policies regarding equity and access.  <b>The Planning Commission could consider integrating further historic background and policy emphasis on addressing the legacy of discriminatory policies.</b>

Key	Comment	Commenters	Staff Response
10.	Support for integrating the Equity Index in the Housing Element. Provide a clear link to the whole body of work in the Equity Index.	Nichols (Futurewise)	<b>Staff concur that a clear link to the Equity Index should be included.</b>
11.	Strengthen actions and policies calling for preventing displacement.  Consider a Community Preference policy to give priority access to a portion of housing units to people who work in the neighborhood or who formerly lived there and were displaced.	Howard; Pow (TPCHD)	Comments noted. Staff note that the proposal already contains policy language regarding preventing displacement, and for actions such as Inclusionary Zoning to address this concern.  Specific implementation concepts, such as a Community Preference policy, could be considered as part of implementation.
12.	Strengthen policy language recognizing that housing is a key factor in maintaining a healthy life. Lack of affordable and decent housing causes stress, compounded with rising transportation costs.	Pow (TPCHD)	Staff concur. <b>The Commission could integrate some of the suggested policy language.</b>
13.	To make single-family zoning more flexible, rename “Single-family” to “detached or single-detached”. Use form-based Codes to encourage missing middle housing.	Pow (TPCHD)	This concept fits within the forthcoming community discussion of AHAS Action 1.8 – Diverse Housing types. In staff’s opinion, the recommended change would be significant and merits further community outreach and engagement.
14.	Add a policy calling for monitoring housing price points and job wages.	Pow (TPCHD)	Staff note that monitoring is already implicitly supported in the proposed Housing Element policies. However, <b>the Commission could consider the proposed policy language.</b>
15.	Emphasize services for homeless people as part of a continuum of housing needs.	Read; Pow (TPCHD)	Staff note that the proposal already calls for services to the most needed households, including homeless individuals. However, <b>the Commission could consider the proposed policy language.</b>
16.	Ensure there are clear and fair guidelines for tenant and landlord protections to prevent	Kruger	Comments noted.

Key	Comment	Commenters	Staff Response
	the unintended consequence of driving up rental costs.		
17.	Add a policy calling for an update to the Infill Pilot Program to integrate lessons learned and consider integrating an ADU affordable housing bonus option.	PDS staff	The Infill Pilot has now been in place for about two years and has generated lessons useful in refining the program. <b>Staff recommend adding specific policy support to update the program.</b>
18.	Support for housing that incorporates community spaces such as village greens that create a sense of community.	Malo (Leslie)	Comments noted.



## Oral Testimony Received

**Event:** Planning Commission Public Hearing No. 2

**Subject:** Affordable Housing Action Strategy

**Date:** May 15, 2019

1. Darby Kruger – Mr. Kruger and his wife moved to Tacoma after they married 36 years ago. He explained that they bought, fixed up, and then rented two homes in Hilltop. He stated that over the years as a landlord, he has gone from being able to do most of the work himself when it comes to evictions, to now having to hire a lawyer because the compliance is so complex and burdensome. He noted that the added cost of compliance will not be borne by him as the business owner, but will instead be passed onto the renter by rent increases. Mr. Kruger suggests that to increase affordable housing, the city increases density in the form of mother-in-law apartments where it won't change the character of the neighborhood, and to allow simple, clear cut, fair guidelines for tenant and landlord protections.
2. Nick Malo – Mr. Malo stated that his comments would be more about the engagement process for the AHAS. He explained that he received his notice for the public meeting on April 30<sup>th</sup> and gave examples of how the language in the notice is vague and does not clearly explain what topics would affect his property. He noted the importance of the Comprehensive Plan, and anything that goes into it, in terms of how policy is developed. Mr. Malo stated that most of the amendments are agreeable, specifically affordable housing, but discussed his concern on how it will be paid for and the implications of including that in the Comprehensive Plan.
3. Martha Ward – Ms. Ward is a Tacoma resident and a member of the Associated Ministries Moral Voice Working Group. She stated that they believe the well-being of the most vulnerable citizens in the community is the moral test of our City. She noted that she especially supports the housing element update, which prioritize the current housing issue. Ms. Ward explained that she believes we can meet the need by preserving current affordable housing and building permanent supportive housing. She urged the Commission to be attentive to the 'action' word in the AHAS, look at the action steps, and to do their part.
4. Molly Nichols – Ms. Nichols is a resident of District 2, and is with Futurewise and the Tacoma Tenants. She stated that she is in full support of the incorporation of the AHAS. She commented on two things specifically that are missing in the AHAS, and that she believes should be added to the Comprehensive Plan. She noted that both were brought up in September and are now part of a resolution sponsored by Councilmember Beale and is being discussed by City Council. The first is to add text that would establish that the overarching Housing and Land Use Policy of the City is to redress institutionalized racism in past and present housing policies and vigorously commence efforts towards racial integration in the fabric of Tacoma's neighborhoods. Ms. Nichols would also like to see the Planning Commission more explicitly lay out the relationship between affordable housing and transportation infrastructure in the housing element of the plan.
5. Jay Atkinson – Mr. Atkinson is 83 years old, retired from the Air Force, and a veteran of the Vietnam War. He has lived in Tacoma for 46 years, and last year was a no-cause eviction with no protections, told to be out in 20 days. He stated that he was a good tenant and paid on time for 30 years, but was given no consideration in allowing him time to find an affordable new place to live. He noted that he called over 70 apartment complexes, only to be told there was no availability, or that they were out of his financial means. He finally found one place available, but it was a 100% increase in rent for 50% of the space, which forced him and his wife to have to get rid of at least half of all they owned. Mr. Atkinson explained that the move from the South End of Tacoma to the West End meant that there were less amenities, including stores, restaurants, and bus service. He noted that it takes time for such analysis to take place, and while it takes place, there are countless families becoming homeless. He stated that

we need to accelerate this process and find a faster solution and range of resources for houses experiencing a housing crisis.

6. Amy Pow – Ms. Pow is with the Tacoma Pierce County Health Department and supports the incorporation of the AHAS from a health perspective. She stated that according to the CDC, about half of our health outcome is based on socioeconomic and environment, and housing is a key factor. She explained that housing provides shelter for sleep which affects our health, stability of low-income families, allows children to get an education, and connects us with our neighbors. Ms. Pow stated that the Health Department encourages the City to institute inclusionary zoning along with a well strategized community building program. They also support infilling medium density, missing middle housing throughout all neighborhoods because it provides a greater chance for affordable home ownership. The Health Department recommends the Commission renames Single Family to Detached or Single Detached, and to use form based code to regulate missing middle housing.
7. Leslie Malo – Ms. Malo began by stating she agrees with the affordable housing idea, especially the missing middle. She asked why we can't build multi-use units that are not high-rises, but instead create a neighborhood. She stated that children and seniors need to know their neighbors, and they should be able to live in a well-planned neighborhood, centered around a village green. She explained that she does not believe that high-rises allow for that sense of community and that they are unaffordable. Ms. Malo stated that loneliness is the new smoking, and it does not help seniors to be alone in a tiny apartment or high-rise. She urged for well planned communities where neighbors can keep an eye on the children and seniors.

# EXHIBIT B: Written Comments

**From:** [Maude Laslie](#)  
**To:** [Planning](#)  
**Subject:** 2019 Amendment to the Comprehensive Plan and Land Use Regulatory Code  
**Date:** Friday, May 17, 2019 5:01:22 PM

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## **Comments to the Planning Commission re: 2019 Amendment to the Comprehensive Plan and Land Use Regulatory Code**

WA State was recently named as “best state to live in by US News & World Report. Livability is defined by how it feels to be in the place that we live—in addition to housing, education and job access the natural environment is integral to making a place liveable. I support and would enhance elements of the Amendment related to expanding, strengthening and extending greenways throughout the region – both inland and along the shorelines. The more we put into action the principles in 6.4.1, the more we protect and maintain what is iconic about our region. The more livable is Tacoma.

For decades, we’ve been gobbling up land for housing, storage facilities, strip malls, other. And when we’re done with buildings, instead of updating them, we rebuild on fresh land. Let’s continue to turn the tides on this sprawling approach. I support the efforts in the Plan Amendment to increase density in our developed regions. I support filling the gap of middling housing.

Re: Housing: Goals H-5

I wholly support the upgrade from “encourage” to “promote”. Suggest using tax incentives or some other incentive to make energy efficiency and green building a reality. There’s a trend to realize the immense energy savings by building for lower ongoing maintenance – this in turn supports lower rents/purchase prices, and lower drag on the power grid.

Recognize the need for housing—the missing middle housing. My concern is the burgeoning traffic in the Puget Sound region and noticeable and marked increase in the Tacoma area. Additional multi-unit housing brings additional multi-cars with each unit. In addition to making these neighborhoods more self-sustaining (less driving), enhance the transit infrastructure and frequency.

Let’s curtail further waterfront development on undeveloped sections of Commencement Bay. Part of the wonder of living here, is while we go about our business, we can look out and see gorgeous waterscapes. More housing abutting our waterways is unappealing and unwise in anticipation of rising sea levels – akin to building on a flood plan.

Shoreline amendment:

Add an amendment that curtails future fossil fuel facilities and expansion of facilities.

I strongly support transition from fossil fuels and all efforts to decrease greenhouse gases now. The Port of Tacoma, a valued member of our community, at times seems to weigh in more than is fair or proper on the development and activity on Commencement Bay and environs.

Estuaries and wetlands are super productive ecologically. The Port occupies huge swaths of our Puyallup River mouth and adjacent inlets. The sections dedicated to habitat restoration and protection are inadequate. Support the provisions that lead to interconnecting and expanding green spaces including throughout the mudflats.

Thank you for this opportunity to comment.

Maude A. Laslie  
5346 Broadview Avenue NE  
Tacoma

**From:** [CJ Cannon](#)  
**To:** [Planning](#)  
**Subject:** 2019 Amendment to the Comprehensive Plan and Land Use Regulatory Code  
**Date:** Friday, May 17, 2019 4:53:31 PM

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Comments to the Planning Commission re:  
2019 Amendment to the Comprehensive Plan and Land Use Regulatory Code

In addition to improving access to affordable housing, jobs, and transit, livability is defined by how it feels to be in the place that we live. Our natural environment is integral to this experience. I support and would enhance elements of the Amendment related to expanding, strengthening and extending greenways throughout the region – both inland and along the shorelines. The more we put into action the principles in 6.4.1, the more we protect and maintain what is iconic about our region. The more livable is Tacoma.

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Recognize the need for housing—the missing middle housing. My concern is the burgeoning traffic in the Puget Sound region and noticeable and marked increase in the Tacoma area. Additional multi-unit housing brings additional multi-cars with each unit. In addition to making these neighborhoods more self-sustaining (less driving), enhance the transit infrastructure and frequency.

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Estuaries and wetlands are super productive ecologically. The Port occupies huge swaths of our Puyallup River mouth and adjacent inlets. The sections dedicated to habitat restoration and protection are inadequate. Support the provisions that lead to interconnecting and expanding green spaces including throughout the mudflats.

Thank you for this opportunity to comment.

Cynthia Cannon  
5346 Broadview Avenue NE  
Tacoma

**From:** [Maureen Howard](#)  
**To:** [Planning](#)  
**Subject:** Addition to Maureen Howard's Public Comment on 2019 Amendment  
**Date:** Thursday, May 16, 2019 4:32:18 PM

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Please add the following to my comments submitted earlier today:

My comments #1-5 were copied directly from the Resolution submitted to the City of Tacoma by Council Member Beale. Although the Council did not consider the Resolution at its May 14 meeting, I believe the material should be considered by the Planning Commission. I should have noted the source of my comments but forgot to do so.

In addition I suggest that the Planning Commission also consider a Community Preference policy such as that formally transmitted by City of Seattle Mayor Jenny A. Durkan for Seattle's Office of Housing and Seattle's Office of Civil Rights. This policy will allow housing developers to give priority access to a portion of housing units to people who work in the neighborhood, or who formerly lived in a neighborhood and have experienced displacement.

No doubt there are other examples around the country.

Sincerely,  
Maureen Howard  
Housing Advocates

--

***MaureenHowardConsulting***  
[maureenhowardconsulting@gmail.com](mailto:maureenhowardconsulting@gmail.com)

Tel: 253-756-8146

3320 S. 8th Street  
Tacoma, WA 98405

## AFFORDABLE HOUSING

MY NAME IS JAY ATKINSON, I AM A 83 YEAR OLD SENIOR CITIZEN AND RETIRED UNITED STATE AIR FORCE VETERAN OF THE VIETNAM WAR. I HAVE LIVED IN TACOMA FOR THE PAST 46 YEARS. WITHIN THE LAST YEAR, I WAS A NO CAUSE EVICTION AND HAD NO PROTECTIONS AT THAT TIME AND TOLD TO BE OUT IN 20 DAYS. I WAS A GOOD TENANT OF 38 YEARS HAVING PAID ALWAYS ON TIME FOR A TOTAL OF 456 RENT PAYMENTS ONLY TO TO GIVEN NO SPECIAL CONSIDERATION IN REGARDS TO ALLOWING ME TO FIND A PLACE AFFORDABLE. I SEARCHED EXTENSIVELY CALLING OVER 70 APARTMENT COMPLEXES ONLY TO BE TOLD THERE WAS NO AVAILABILITY, OR ELSE TOTALLY OUT OF MY FINANCIAL MEANS. FINALLY, I FOUND ONE PLACE AVAILABLE BUT IT COST ME 100% MORE THAN THE RENT I WAS PRESENTLY PAYING AND IN ADDITION IT PRESENTED ME WITH ANOTHER PROBLEM, IT WAS ONLY HALF THE SIZE OF THE APARTMENT I WAS IN. I HAD TO TAKE IT NO MATTER WHAT. SO I SIGNED A LEASE WHICH INCORPORATED AN AUTOMATIC \$50 MORE RENT RAISE AT THE END OF THE LEASE AS WELL AS HAVING TO PAY EXTRA FOR A PARKING SPACE WHEN I DON'T EVEN OWN A CAR. IT WAS A SORT OF TAKE IT OR LEAVE IT, THE LEAVE IT PLACING ME ON THE STREETS WITH MY WIFE AND BECOME HOMELESS. BECAUSE OF THE SIZE OF THE APARTMENT, I WAS FORCED TO DOWNSIZE AND GET RID OF AT LEAST 50% OF ALL THAT I OWN, EVEN THE CLOTHES ON OUR BACKS. THE LOCATION FORCED ME TO MOVE FROM SOUTH TACOMA TO THE WEST SIDE WHERE WE HAVE LESS AMENITIES SUCH AS STORES, RESTRAUNTS, BUS SERVICES ETC.

I AM HERE TODAY TO ADVOCATE FOR EXCELLERATION OF THE RECOMMENDATIONS TO THE HOUSING ELEMENT WHICH CALLS FOR AFFORDABLE HOUSING AND HOUSING CHOICE THOUGHOUT THE CITY. HOWEVER, I HAVE NOTED

THAT THE ELEMENT WAS LAST UPDATED IN 2015. IT TAKES A GREAT DEAL OF TIME FOR SUCH AN ANALYSIS TO TAKE PLACE AND THIS IS WHY I AM CONCERNED THAT WHILE SUCH A STUDY TAKES PLACE THERE ARE COUNTLESS FAMILIES BECOMING HOMELESS. WE NEED TO ACCELERATE AND FIND A FASTER SOLUTION AND CREATE A RANGE OF RESOURCES FOR HOUSEHOLDS EXPERIENCING A HOUSING CRISIS. IF WE LAG IN THIS ENDEAVOR, IT IS MUCH LIKE TAKING ONE STEP FORWARD AND TWO STEPS BACK. THE LONGER WE ARE INDICIVE, THE MORE HOMELESSNESS WE ARE CREATING. THE ONLY HELP I CAN PROVIDE IS TO PRAY THAT YOU WILL WORK EFFORTLESSLY AND EFFICIENTLY TO SOLVE WHAT IS A PROBLEM THAT HAS DEVASTATING EFFECTS ON THE MOST VULNERABLE OF OUR SOCIETY, THE POOR, THE HANDICAPPED AND THE SENIOR POPULATION. THANK YOU FOR YOUR TIME AND GOD BLESS YOU ALL.

# HISTORIC TACOMA

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## Board of Directors

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## Staff

Michael Lafreniere,  
Outreach &  
Communications Director



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[info@historictacoma.org](mailto:info@historictacoma.org)

*Mailing Address*

PO Box 7664  
Tacoma, WA 98417

May 6, 2019

Tacoma Planning Commission  
747 Market Street, Room 349  
Tacoma, WA 98402

Dear Chair Wamback and Commissioners,

Historic Tacoma has some concerns regarding the proposed Affordable Housing Action Strategy (ANAS) element of the One Tacoma Comprehensive Plan. Specifically, we are concerned with the reliance on the “Missing Middle” argument coined by California developer and architect Daniel Parolek in 2010. The argument claims restrictive zoning has caused the lack of affordable housing by limiting the construction of duplexes, triplexes and other multifamily housing in American cities. The problem is that Tacoma’s history of housing development belies this claim completely. More than 80% of Tacoma’s current housing stock was built before zoning was even introduced in 1953. Zoning, restrictive or otherwise, has had very little impact on the character of the vast majority of the city’s housing.

The 2015 “taHOMEa” report that first introduced the “missing middle” concept completely ignores this history in its analysis. Rather than investigating the actual historical factors affecting specifically Tacoma’s residential development, such as the 1918 Spanish flu epidemic and the removal of streetcar lines in 1938, that study starts by assuming restrictive zoning as the culprit. However, the “Era Built” map (pg. 33) shows clearly that zoning, at best, only affected outlying peripheral neighborhoods in West, East and South Tacoma. It would be even more dramatic if the post-WWII housing boom from 1946 to 1953 were not included in the category 1946-1966. Also, nowhere is the actual amount of the multi-family housing tallied in Tacoma’s various residential neighborhoods or their varying housing densities assessed. Correctly understanding the history of Tacoma’s residential development and assessing the actual housing densities of Tacoma’s various neighborhoods as opposed to applying a reductive, “one size fits all” explanation will lead to better policy for the future.

Moreover, we note that the “missing middle” supply-side, deregulatory approach to affordable housing has begun to be increasingly criticized. For example, in 2015 the city’s Affordable Housing Advisory Group specifically stated in a memo to the Planning Commission that while single-family residential infill might meet other goals, it would not address housing affordability. A 2018 study for the Federal Reserve Board found that marginal supply increases would unlikely affect rental rates but that improving amenities and public transportation to low-priced neighborhoods did.<sup>1</sup> Moreover, a recent study of up-zonings in Chicago’s neighborhoods found that they led to higher, not lower home prices while having little discernable effect on housing supply.<sup>2</sup>

<sup>1</sup> Elliot Anenberg & Edward Kung, 2018, “Can More Housing Supply Solve the Affordability Crisis? Evidence from a Neighborhood Choice Model,” Finance and Economics Discussion Series 2018-035. Washington: Board of Governors of the Federal Reserve System.

<sup>2</sup> Yonak Freemark, Upzoning Chicago: Impacts of a Zoning Reform on Property Values and Housing Construction, *Urban Affairs Review*, 01/29/2019.

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[info@historictacoma.org](mailto:info@historictacoma.org)

*Mailing Address*

PO Box 7664  
Tacoma, WA 98417

We don't doubt that some zoning may need to change. However, like the Affordable Housing Advisory Group, we are skeptical of pro-market, neo-liberal solutions that fail to focus on the massive need for more and better paying jobs, better renter protections, more subsidized public housing and requiring affordable housing at all levels of rental housing in Tacoma.

Sincerely,

Kathleen Brooker  
Chair

May 17, 2019

Planning Commission  
747 Market St, Room 349  
Tacoma, WA 98402

**Re: Comments on Future Land Use Map; Comprehensive Plan; and Manitou Annexation**

Dear City of Tacoma Planning Commissioners,

Thank you for the opportunity to comment on the 2019 Amendment to the Comprehensive Plan and Land Use Code. My name is Molly Nichols, and I am the Tacoma Program Manager with Futurewise, a statewide nonprofit that prevents urban sprawl and advocates for sustainable and equitable land use policies. Over the past year we have supported tenant organizing for tenant protections and affordable housing in Tacoma. This letter comments on the Future Land Use Map Implementation, the Affordable Housing Action Strategy Incorporation into Comprehensive Plan, and the Manitou Potential Annexation.

**Future Land Use Map Implementation**

**We support the proposed rezones and amendments that make our zoning consistent with Tacoma's comprehensive plan.** As our region grows, we need policies in place for compact and connected neighborhoods to manage the growth and ensure equitable access. The proposed zoning changes create opportunities for more residents to live in transit friendly corridors with more amenities. They also help local commercial districts thrive by bringing more residents closer to small businesses, and they support our public transit systems by bringing more riders to the corridors.

These changes also create more diverse housing options. Most of Tacoma is zoned for single family housing, while the regional growth and mixed-use centers are zoned high density multi-family. These proposed rezones create more opportunities for duplexes, triplexes, townhomes, and small apartment buildings—options that will help to meet the diverse housing needs in our community.

Lastly, the proposed changes also begin to address the impacts of redlining and other historically exclusionary practices. Until 1968 when the Fair Housing Act was passed, people of color were legally excluded from buying homes in certain neighborhoods in Tacoma and across the country. Banks refused to lend money for families to purchase homes, and homeowner associations created restrictive covenants. People of color were cut off from neighborhoods like the North End, with amenities including parks, libraries, grocery stores, strong performing schools, adequate transportation infrastructure, and more. While redlining may no longer be legal, de facto versions of it still occur, and we still live with its legacy. We need changes in policies to begin to reverse past and present harm.

**Affordable Housing Action Strategy Incorporation into Comprehensive Plan**

**We fully support the incorporation of the Affordable Housing Action Strategy into the Housing Element of the City's Comprehensive Plan.** Not only does this update the data in the plan and indicate more urgency and action around this issue, but it also begins to address the impacts of historically inequitable zoning decisions and housing policies.

I do want to highlight two omissions from the Affordable Housing Action Strategy that should be brought into the Comprehensive Plan. Futurewise shared these in September when the Affordable Housing Action Strategy was approved by council, and the items are now part of Resolution 40328 (sponsored by Councilmember Beale).



This resolution has not yet been voted on by City Council, but the contents are worth your consideration in this amendment process.

Resolution 40328 proposes the following: “the Planning Commission should develop a housing racial justice policy in the City’s One Tacoma Comprehensive Plan that establishes that the overarching housing and land use policy of the City is to redress institutionalized racism in past and present housing policies, and vigorously commence efforts toward socioeconomic and racial integration into the fabric of Tacoma’s neighborhoods through zoning, programs, funding and policy.” Our current housing system (including our segregated neighborhoods where people of color have less access to amenities and opportunities) is not an accident, but, as Richard Rothstein argues in *The Color of Law* a direct result of segregationist government policies. It is going to take bold government action to reverse this past and present harm, and this Planning Commission plays a vital role.

**Therefore, Tacoma’s comprehensive plan should more explicitly name the historical inequities of redlining, exclusionary zoning, and restrictive covenants to ensure that communities of color and other residents who have been excluded are directly benefiting from new housing policies.**

We understand there is a proposal to replace the PSRC equity maps currently in the Housing Element of the Comprehensive Plan with the City of Tacoma’s new equity maps. Including this more local and updated data is worthwhile. The plan should include access to the entire Equity Index to reveal the demographics of neighborhoods in relation to opportunity. You might also include historical maps to help track the policies and zoning that have determined our current segregated neighborhoods.

Another opportunity for the Planning Commission is to more explicitly lay out the relationship between affordable housing and transportation, especially public transit, in the Housing Element of the Comprehensive Plan. Transit service was a key factor for the area wide re-zones, and the Comprehensive Plan currently maps transit priority networks, which is excellent. With respect to our housing policy, we need to upzone and pass inclusionary housing policies in frequent transit corridors, for example places ¼ mile from buses that run every 15 minutes. This creates mixed income neighborhoods and ensures low income people can access transportation and other amenities.

We also support amending the Comprehensive Plan to include coordinating public investments with affordable housing, expanding tenant protections (especially Just Cause, which requires a legitimate business reason for a landlord to terminate a tenancy), and prioritizing households with the greatest need. The plan could also name the importance of providing incentives for affordable accessory dwelling units and the reduction or elimination of parking requirements. Unnecessary parking requirements direct investments toward housing cars instead of housing people.

**Manitou Potential Annexation:**

**The Manitou unincorporated area of Pierce County should be annexed to the City of Tacoma**, as provided for in the Growth Management Act. Cities have the authorities to provide good public facilities and services long-term to urban areas. The best option for rezoning is Option 2 which includes an R3 designation instead of the R2 designation in Option 1. The R2 designation is a significant down zone from the current Mixed Use District designation which allows 60 foot residential buildings. R3 would not significantly impact the current residential area, and it would begin to meet the goal of creating more opportunities for missing middle housing.

Thank you for considering these comments and for your service on this commission. If you require additional information, please contact me at 412-216-9659 or email [molly@futurewise.org](mailto:molly@futurewise.org).

Sincerely,

Molly Nichols  
Tacoma Program Manager, Futurewise



May 14, 2019

Chair S. Wamback  
Planning Commission  
747 Market Street, Room 349  
Tacoma, WA 98402

Dear Chair Wamback and Planning Commissioners,

### **Affordable Housing Action Strategy—One Tacoma Plan Incorporation**

Health starts where people live, work and play. Housing is a key contributing factor to maintain a healthy life. It provides shelter for a good night sleep, and stability to low-income families enabling children to perform better in school, adults to keep jobs, and neighbors to feel connected and safe.

The lack of affordable and decent housing can cause stress. Compounded with rising transportation cost and long commuting, the burden people shoulder over time affects their physical health and mental well-being.

Tacoma-Pierce County Health Department encourages the City to address the combined housing/ transportation cost burden. Incorporating the Affordable Housing Action Strategies into the comprehensive plan is the right direction to fix the “housing” component of the combined cost burden equation.

Displacement comes hand in hand with the lack of affordable housing choices. The Department applauds City’s action on anti-displacement measures called out in P.2 of your staff report. Besides those measures, we encourage the City to empower local communities to guard against the wave of displacement. This requires meaningful community engagement throughout the planning process to instill a sense of belonging and build resiliency. Institute inclusionary zoning alongside a well-strategized “community building/development process”.

This point was being echoed at this year’s UWT Urban Forum. Two speakers from New York, Luis Munive and Ron Shiffman, stressed the importance of introducing both “mandatory” inclusionary zoning and an intensive “community-based planning process” to tackle local affordable housing opportunities and retention. Ron, in his article [Community Building and Housing Affordability in a Diverse and Equitable](#)

City<sup>1</sup>, stated that “community-based planning should precede zoning”. Luis’ El Puente’s Green Light District<sup>2</sup> demonstrated “how good planning can weave housing with (local) arts and culture”. Fostering local arts, culture and heritage can help create neighborhood identity and stability.

Planners striving for healthy communities would nurture community identity and resilience in anticipation of gentrification and property value increase. To advance the Equity and Inclusion agenda, the City can show leadership by empowering the voiceless.

Your staff report mentioned that a target of 7,000 new dwellings will fall within land zoned for “single-family development”. We support infilling affordable low- to medium-density missing middle housing, ranging from attached ADU/duplex to triplex or even quadplex, throughout all traditional single-family neighborhoods. This is because:

- The majority of the land (75%) is currently zoned for single-family (SF) uses. It’s only logical to tap into this unused potential with infrastructure capacity.
- Relaxing SF zoning for low- to medium-density missing middle housing would give a fair chance for all neighborhoods to become affordable, rather than concentrating affordable housing in certain underserved areas.
- According to PSRC research, medium-density missing-middle housing provides a greater opportunity for affordable housing ownership. This could improve residential and neighborhood stability.
- Integrating low-income with high-income families can improve population health and reduce health disparities. This helps mitigate “your zip code can determine your health”<sup>3</sup>. Neighborhood integration provides low-income families fairer access to rich opportunities existent in high-income neighborhoods.
- More infill housing within traditional neighborhoods can foster inter-generational communities and afford one to age in place.

To make SF zoning more flexible, the Health Department recommends two approaches:

1. Rename “single-family” to “detached or single-detached”. This subtle change can remove the notion of protecting one family per dwelling. At the same time, this allows more than one household to share a free-standing detached dwelling in keeping with the character of traditional neighborhoods. Such built form can accommodate a range of missing-middle dwellings, ranging from duplex to sensitively-designed quadplex.
2. Use form-based Codes (FBC) to encourage missing-middle housing<sup>4</sup>. Literature indicates that this is the best way to regulate “missing-middle housing”.

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<sup>1</sup> <http://www.centrernyc.org/community-building-and-housing-affordability>

<sup>2</sup> <https://elpuente.us/green-light-district>

<sup>3</sup> <https://www.foxnews.com/health/your-zip-code-can-determine-your-health-study-says>

<sup>4</sup> <https://missingmiddlehousing.com/about/how-to-regulate>

## **Attachment 2: Proposed Updates to the Housing Element**

Here are some specific comments for your consideration:

**Policy H-1.9:** Add “and remove zoning barriers” after “Apply infill housing approaches”.

*Rationale: One zoning barrier associates with the nomenclature of “single family” zoning. Consider renaming “single family” to “single-detached” with the reasons stated above. This built-form approach would allow low- to mid-range missing middle housing types in traditional neighborhoods, like Minneapolis’ resolution of permitting up to triplexes in single-family areas.*

**Narrative on Mission Middle Housing:** Replace “single-family” with “single-detached” in this section and throughout the entire element.

*Rationale: See reasons stated above. Currently there are triplexes already quietly nested within single-detached dwellings in mature neighborhoods, without causing any encumbrance on neighborhood resources.*

**Policy H-2.6:** Replace “pursue corrective actions” with “develop preventive actions upfront with local residents and businesses”.

*Rationale: Any successful anti-displacement measures should be developed with local communities before zoning changes, according to Ron Shiffman. This genuine community engagement process will empower current local residents/businesses to become “neighbors for new neighbors”.*

**Policy H-2.8:** Add “and social” between “increasing community organizing” and “capacity”.

*Rationale: The “community-based planning process”, which both Luis Munive and Ron Shiffman advocate, is a community development and social capacity building process providing the underserved a sense of belonging and equip them to cope with displacement.*

**Add a new Policy H-3.9 to Goal H-3:** “Monitor housing price points and job wages in opportunity rich areas and other mixed-use centers where affordable housing is encouraged”.

*Rationale: It’s important to match affordable housing units with local jobs created. This ensures wage-affordable housing is within walking distance to jobs in the vicinity.*

**Housing Principles + Acknowledgements Table on P. 5-16:** Recommend adding a new principle, if possible:

“9. Affordable and adequate housing supports health. *Positive impacts of affordable housing on health include: freeing up family resources for nutritious food and health care expenditures; reducing stress and other related adverse health outcomes by providing greater residential stability, and an increased sense of security and control; reducing health problems by limiting exposure to allergens, etc., caused by poor quality housing; and providing families with greater access to neighborhood opportunities and amenities.*”

**Policy H-4.4:** Add the phrase “living wage jobs,” before “education”.

*Rationale: Bring living wage jobs closer to affordable housing. This can reduce commuting time, the relieve the housing/transportation cost burden for families; and in turn, improve health and well-being.*

**Policy H-4.7:** Add another sentence at the end. “This housing continuum includes tiny homes, modular and micro-units, among others.”

*Rationale: Provide specific examples of housing types in this continuum of housing opportunities. Some of the above examples are relevant to address homelessness.*

**Policy H-5.8:** Replace “Support” with “Create”.

*Rationale: Lakewood’s Rental Housing Safety Program<sup>5</sup> is worth exploring to ensure the affordable housing stock is safe, adequate and healthy for tenants to live in. Their program received a Healthy Communities Platinum Award<sup>6</sup> in 2017.*

**Policy H-6.1:** Replace the phrase after “a coordinated effort” with “led by the City of Tacoma in partnership with a broad range of stakeholders, particularly local communities”.

*Rationale: This is to call out local communities as a group of important stakeholders.*

Tacoma-Pierce County Health Department continues to work with the City to make our communities healthier.

Sincerely,



Amy Pow, MCIP  
Principal Planner  
[Healthy Community Planning Program](#)  
Tacoma Pierce-County Health Department  
[apow@tpchd.org](mailto:apow@tpchd.org)  
(253) 576-6222

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<sup>5</sup> <https://rentalhousing.cityoflakewood.us/>

<sup>6</sup> <https://www.tpchd.org/healthy-places/planning-for-healthy-communities/awards>

**From:** [Carolyn Read](#)  
**To:** [Barnett, Elliott](#)  
**Subject:** Comments on Affordable Housing Action Strategy – Planning Actions  
**Date:** Monday, May 13, 2019 8:28:43 PM

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To: Elliott Barnett, Senior Planner  
253-591-5389, [elliott.barnett@cityoftacoma.org](mailto:elliott.barnett@cityoftacoma.org)

Thank you for the opportunity to make comments on the affordable housing action strategy. Lately I've been working as a volunteer on homeless issues and I would like to see the homeless population housing needs to be specifically addressed in this plan.

Ideas to consider:

1. Incentivize developers. Perhaps Provide multi family property tax exemptions for developers to build (very) low income housing.
2. Innovative strategies. Allow one room units like the flop houses of the old days, tiny home complexes, supportive housing for those with special needs, safe parking lots for those living out of cars.
3. Permit more shelters. Many have 30-90 day waiting lists. Everyone deserves a safe place to lay their head at night.

I'd also like to see the plan promote alternative transportation methods such as dedicated biking lanes, more pedestrian friendly designs and crossing lights on busy streets.

Regards,

Carolyn Read  
3002 N Warner St  
Tacoma WA

**From:** [Jill & Rob Jensen](#)  
**To:** [Planning](#)  
**Subject:** infill housing comments  
**Date:** Friday, May 17, 2019 4:58:46 PM

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My comments are focused implementation of infill housing in Tacoma. I am not opposed to increased urban density but increasing density needs to be done with careful thought and a vision of how we want our city to look and feel.

My issues are:

- 1) There must be a process of design review, to include historic review if applicable. Structures need to “fit in” with the surrounding neighborhood.
- 2) Adequate parking. Don’t rely on public transportation assuming that people will not have cars.
- 3) Owner lives on site in the case of ADUs
- 4) No tax breaks for developers. We all need to participate.

Regards,  
Robert Jensen  
3002 N 13th

**From:** [Maureen Howard](#)  
**To:** [Planning](#)  
**Subject:** Public Comment on 2019 Amendments to the Comprehensive Plan  
**Date:** Thursday, May 16, 2019 12:49:26 PM

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Greetings:

Please add the following to the public comments on the Housing Element of the 2019 Amendments to the One Tacoma Comprehensive Plan:

1. The Planning Commission should include considerations of racial and socioeconomic justice and reduce displacement risk and gentrification in its review of affordable housing policy within the Housing Element of the One Tacoma Comprehensive Plan.
2. The Planning Commission should review updates to the Housing Element of the Tacoma Comprehensive Plan that acknowledge and detail the history of systemic and institutionalized racism by redlining in housing policy, exclusionary land use practices that made illegal a variety of housing types in large areas of the city in an effort to exclude people along race and class lines, and the recording of racially restrictive private covenants meant to explicitly exclude black and brown residents from certain neighborhoods.
3. The Planning Commission should develop a housing racial justice policy in the city's One Tacoma Comprehensive plan that establishes that the overarching housing and land use policy of the City is to redress institutionalized racism in past and present housing policies and vigorously commence efforts toward socioeconomic and racial integration into the fabric of Tacoma's neighborhoods through zoning, programs, funding and policy.
4. The Planning Commission should review and recommend for implementation land use policies and zoning regulations designed to help overcome past racially-discriminatory housing policies by increasing access to a greater diversity of housing types for all of our neighbors, especially in areas that currently lack diverse housing options as a result of previously exclusionary housing policy.
5. That such an effort (#4 above) should include but not be limited to consideration of the following:
  - Develop policy proposals to allow more homes in all neighborhoods, particularly near transit corridors, to include increasing allowed single-family land use densities and reducing lot size and dimension requirements;
  - Explore strategies to remove barriers to Accessory Dwelling Unit (ADU) development, and provide incentives for affordable ADUs, including approaches that will incentivize very low to extremely low income units, such as consideration for two ADUs on each lot, low interest loan programs, architectural prototypes, and outreach and education programs.
  - Explore strategies to permit "tiny homes on wheels."
  - Examine how to integrate affordable housing into market rate developments, particularly near public transit, through measures such as, creation of a policy framework and work plan for inclusionary zoning using market-based study methods and direct engagement with the development community to ensure feasibility.

Sincerely,  
Maureen Howard  
Housing Advocate

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***MaureenHowardConsulting***  
[maureenhowardconsulting@gmail.com](mailto:maureenhowardconsulting@gmail.com)

Tel: 253-756-8146

3320 S. 8th Street  
Tacoma, WA 98405

**From:** [Jason Gauthier](#)  
**To:** [Planning](#)  
**Subject:** Public Comment on Incorporation of AHAS into comprehensive plan  
**Date:** Thursday, May 16, 2019 11:11:14 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Tacoma/Pierce County would like to support the incorporation of the Affordable Housing Action Strategy (AHAS) into the comprehensive plan and highlight a few areas of emphasis in Strategic Objective 1 that we believe need immediate consideration and review.

### **Action 1.5**

The City of Tacoma has declared public health emergency in response to rising rates of homelessness. When a state of emergency are declared it's a signal to the public that government forces are being marshalled to immediately and overwhelmingly response to the crisis, but this hasn't been the case in our current state of emergency. In order to build necessary housing for homeless and low-income households we need swift and decisive action. A 3-5 moratorium on permitting fees for affordable housing development, would be an easy start and would be supported by a wide array of non-profit service providers.

### **Action 1.6**

The coordination of resource is critical to bring and an end to this crisis. Habitat for Humanity, acting as the final piece of the affordable housing continuum, urges the city to considering modifying administrative rules around the securing of federal government program resources (HOME and CDBG) to allow those programs to be aligned with publically available down payment assistance programs.

### **Action 1.8**

A section of the planning department focused on creatively assisting – with minimal resource outlay – the development of affordable housing could be a critical piece to responding to the need for affordable housing.

We also would like to make an appeal to ensure affordable homeownership programs, which have the potential to permanently end a low-income household's struggle with housing affordability and provide a pathway to long term asset and wealth building, should be an emphasis in any comprehensive plan pertaining to affordable housing development. These programs have the capacity to allow long term community members to access the benefits of the communities and neighborhoods they've help build, but are being pushed out of.

Thank you.

**Jason Gauthier**

Director of Operations & Government Affairs  
253-627-5626 ext. 115



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**From:** [Patricia Menzies](#)  
**To:** [Planning](#)  
**Subject:** Resolution 40328  
**Date:** Thursday, May 16, 2019 6:05:36 PM

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Greetings,

Since I just saw this today and understand that comments need to be in by tomorrow, I'll keep this very brief. I read the resolution and an excerpt from the Council's Action Memorandum on the Resolution. I was very disappointed that this seemingly obvious step needed to address historical inequities and discrimination against people of color in our community (along with many if not most others in the country!) was NOT voted out of committee and brought before the Council and the people of Tacoma.

I moved to Tacoma in 1984 but my grandparents moved here in 1919. I've lived in the Hilltop or Central Tacoma area since 2006. When I bought my house on South Grant in 2010, I didn't even think about that fact that I, a white person, was buying what was likely historically a home built by and for a black family. I have learned much in the last 13 years of living here and interacting with some of the organizations focused on the history of Hilltop. I am committed to helping to preserve the affordability of this neighborhood for those whose families have lived here for generations. That resolution could help with that effort.

I hope you will encourage the Council to take this up again soon and bring it to the community for a full discussion AND action. It's way past time to begin raising awareness and helping to make up for some of the past injustices.

Thank you,  
Patricia Menzies  
615 and 619 S. Grant Ave.

**Exhibit 8 Strategic Objective 1: Actions to Create More Homes for More People**

HOW WILL THIS ACTION BE IMPLEMENTED?	WHEN WILL WORK HAPPEN?	WHO CAN LEAD IMPLEMENTATION?	WHO CAN ASSIST WITH IMPLEMENTATION?
<b>ACTION 1.1</b> Seed the Tacoma Housing Trust Fund with local sources of funding.			
<ul style="list-style-type: none"> <li>Earmark \$1.8 million for affordable housing activities in the 2019–2020 biennium budget cycle.</li> <li>Work with local partners to set priorities for how to use this funding.</li> <li>Update Affordable Housing Developer Loan NOFA guidelines, underwriting standards (if needed), and solicitation process to align with local funding priorities.</li> <li>Identify separate revenue source (in place of or in addition to general funds).</li> </ul>	Immediate (1–2 years)	Tacoma City Council	<ul style="list-style-type: none"> <li>City Manager’s Office</li> <li>Office of Management and Budget</li> <li>Community and Economic Development Department</li> <li>Tacoma Community Redevelopment Authority</li> <li>Tacoma Housing Authority</li> <li>Local and regional developers</li> </ul>
<b>ACTION 1.2</b> Modify inclusionary housing provisions to target unmet need and align with market realities.*			
<ul style="list-style-type: none"> <li>Work with developers and other stakeholders to refine the policy proposal outlined in the AHAS.</li> <li>Develop draft legislative language.</li> <li>Establish revised inclusionary housing policy.</li> <li>Conduct outreach to developers about new tools, including what projects they affect, where they apply, and how to use them.</li> <li>Identify lead department to monitor performance of new policy and regularly report on performance to City Council.</li> <li>Work with the Tacoma Housing Authority to provide project-based vouchers to support the rents at these units (as needed).</li> </ul>	Immediate (1–2 years)	Tacoma City Council	<ul style="list-style-type: none"> <li>Planning and Development Services Department</li> <li>Community and Economic Development Department</li> <li>Local and regional developers</li> <li>Residents living in proposed target areas</li> <li>Tacoma Housing Authority</li> </ul>
<b>ACTION 1.3</b> Update the Multifamily Tax Exemption Program to increase its impact.*			
<ul style="list-style-type: none"> <li>Offer 12-year option in areas where revised inclusionary housing policy applies (by eliminating 8-year option in those areas).</li> <li>Revise Multifamily Tax Exemption Program guidelines to create a notice provision for property owners using the 12-year option who opt out of it.</li> <li>Incorporate properties using the 12-year option into the city’s “early warning” system.</li> </ul>	Immediate (1–2 years)	Tacoma City Council	<ul style="list-style-type: none"> <li>Community and Economic Development Department</li> <li>Property owners</li> <li>Tenants</li> <li>Local and regional nonprofits</li> </ul>
<b>ACTION 1.4</b> Leverage publicly and partner-owned land for affordable housing.			
<ul style="list-style-type: none"> <li>Develop draft language for a comprehensive land disposition policy for publicly owned land.</li> <li>Adopt a comprehensive land disposition policy for publicly owned land.</li> <li>Evaluate near-term opportunities for affordable housing on city-owned land, using existing baseline data on vacant or publicly owned parcels that could be used for development or sale.</li> <li>Complete inventory of publicly and partner-owned land (as part of public land study led by Forterra).</li> <li>Evaluate opportunities for affordable housing development on an ongoing basis, using findings from the City of Tacoma’s forthcoming public land study and land disposition policy.</li> </ul>	Immediate (1–2 years)	Tacoma City Council	<ul style="list-style-type: none"> <li>Public Works Department</li> <li>Community and Economic Development Department</li> <li>Tacoma Housing Authority</li> <li>Tacoma Public Schools</li> <li>MetroParks</li> <li>Pierce County</li> <li>Forterra</li> <li>Local and regional developers</li> </ul>

Note: An asterisk (\*) denotes a priority action among Technical Advisory Group members.

Continued on the following page

**Exhibit 8 Strategic Objective 1: Actions to Create More Homes for More People (cont.)**

HOW WILL THIS ACTION BE IMPLEMENTED?	WHEN WILL WORK HAPPEN?	WHO CAN LEAD IMPLEMENTATION?	WHO CAN ASSIST WITH IMPLEMENTATION?
<b>ACTION 1.5</b> Create consistent standards for fee waiver eligibility and resources to offset waived fees.			
<ul style="list-style-type: none"> <li>Allocate additional local funding to offset waived fees (e.g., general funds, Tacoma Housing Trust Fund, etc.).</li> <li>Develop criteria for eligible projects (such as share of income-restricted units in development, income levels served, location [near transit or services], etc.).</li> <li>Coordinate solicitation and evaluation of projects seeking fee reductions or waivers with other local solicitations for housing funds, such as Tacoma Community Redevelopment Authority’s annual NOFA.</li> <li>Conduct outreach to affordable housing developers about available resources and selection process.</li> </ul>	<p>Immediate (1–2 years)</p>	<p>Planning and Development Services Department  Public Works Department</p>	<ul style="list-style-type: none"> <li>Community and Economic Development Department</li> <li>Tacoma Housing Authority</li> <li>Local and regional developers</li> </ul>
<b>ACTION 1.6</b> Create a process to coordinate public investments, like capital improvements, with affordable housing activities to reduce the overall cost of development.			
<ul style="list-style-type: none"> <li>Map key decision making and timelines associated with developing the city’s Capital Improvement Plan and ongoing community-development activities (e.g., NOFA solicitation, CBDG investments, etc.).</li> <li>Create criteria to assess public infrastructure related to affordable housing development, including target areas for affordable housing policies or programs or planned affordable housing developments.</li> <li>Develop coordinated process that can be used as part of capital improvement planning.</li> <li>Identify lead department to integrate coordinated process into the Capital Improvement Plan.</li> </ul>	<p>Immediate (1–2 years)</p>	<p>City Manager’s Office</p>	<ul style="list-style-type: none"> <li>Planning and Development Services Department</li> <li>Environmental Services Department</li> <li>City Manager’s Office</li> <li>Community and Economic Development Department</li> <li>Tacoma Public Utilities</li> </ul>
<b>ACTION 1.7</b> Increase participation in existing first-time homebuyer programs and resources for new homebuyers.			
<ul style="list-style-type: none"> <li>Proactively partner with community-based groups to market existing programs to interested homebuyers, focusing on areas where residents are at-risk of displacement.</li> <li>Allocate additional local funding (e.g., general funds, Tacoma Housing Trust Fund, etc.) to supplement down-payment assistance offered through existing homebuyer assistance programs.</li> <li>Work with local anchor institutions or other large-scale employers to create “Live Near Your Work” or other employer-assisted housing programs.</li> </ul>	<p>Immediate (1–2 years)</p>	<p>Community and Economic Development Department</p>	<ul style="list-style-type: none"> <li>Homeownership Center of Tacoma</li> <li>Washington State Housing Finance Commission</li> <li>Habitat for Humanity</li> <li>City Manager’s Office</li> <li>Anchor institutions</li> <li>Large-scale employers</li> </ul>
<b>ACTION 1.8</b> Encourage more diverse types of housing development through relaxed land use standards, technical assistance, and financial incentives.			
<ul style="list-style-type: none"> <li>Evaluate current land-use regulations and identify ways to support a wider range of housing types through existing or modified zoning classifications and areas of higher opportunity.</li> <li>Conduct outreach to residents in areas where changes may occur to discuss proposed changes and adjust recommendations accordingly.</li> <li>Develop technical assistance programs, such as a set of pre-approved construction drawings for small-scale housing products (like accessory dwelling units).</li> <li>Develop additional incentives to support development of infill, such as fee waivers and construction cost grants.</li> <li>Engage national experts, like the Incremental Development Alliance, to cultivate local expertise in small-scale development.</li> </ul>	<p>Immediate (1–2 years)</p> <p>Short-term (3–4 years)</p>	<p>Planning and Development Services Department</p>	<ul style="list-style-type: none"> <li>Tacoma City Council</li> <li>Community and Economic Development Department</li> </ul>

Note: An asterisk (\*) denotes a priority action among Technical Advisory Group members.

Continued on the following page

**Exhibit 8 Strategic Objective 1: Actions to Create More Homes for More People (cont.)**

HOW WILL THIS ACTION BE IMPLEMENTED?	WHEN WILL WORK HAPPEN?	WHO CAN LEAD IMPLEMENTATION?	WHO CAN ASSIST WITH IMPLEMENTATION?
<b>ACTION 1.9</b> Establish a dedicated source of funding for the Tacoma Housing Trust Fund.*			
<ul style="list-style-type: none"> <li>• Convene an advisory group of local partners to develop a financing plan and articulate the potential uses of the fund.</li> <li>• Conduct a poll of local and regional residents to understand their support for different potential uses (and adjust financing plan accordingly).</li> <li>• Pass an emergency ordinance and adopt financing plan (per state law).</li> <li>• Work with partners on a public education campaign to educate members of the public on the importance of a dedicated source of funding.</li> </ul>	Short-term (3–4 years)	Tacoma City Council	<ul style="list-style-type: none"> <li>• City Manager’s Office</li> <li>• Office of Management and Budget</li> <li>• Community and Economic Development Department</li> <li>• Tacoma residents</li> </ul>
<b>ACTION 1.10</b> Use value capture to generate and reinvest in neighborhoods experiencing increased private investment (with a focus on areas with planned or existing transit).			
<ul style="list-style-type: none"> <li>• Study the feasibility of creating a value-capture tool tailored to areas experiencing increased private investment, including areas with or planned high-capacity transit.</li> <li>• Use findings of study to identify and establish appropriate value-capture mechanism(s).</li> <li>• Work with local residents in neighborhoods where value-capture is being used to discuss potential investments.</li> <li>• Coordinate investments with capital improvement planning.</li> </ul>	Short-term (3–4 years)	Community and Economic Development Department  Office of Management and Budget	<ul style="list-style-type: none"> <li>• Planning and Development Services Department</li> <li>• Tacoma City Council</li> <li>• Public Works Department</li> <li>• State of Washington</li> <li>• Residents living in proposed value capture areas</li> </ul>
<b>ACTION 1.11</b> Explore innovative, low-cost housing solutions to serve persons experiencing homelessness.			
<ul style="list-style-type: none"> <li>• Work with local and regional foundations and anchor institutions to discuss opportunities to support low-cost housing solutions.</li> <li>• Identify resources to host a design competition or solicit for proposals to develop housing prototypes.</li> <li>• Identify resources (including City funding) to support pilot projects.</li> <li>• Work with the Tacoma Housing Authority to provide project-based vouchers to support the rents at these units.</li> </ul>	Short-term (3–4 years)	Community and Economic Development Department  Neighborhood and Community Service Department	<ul style="list-style-type: none"> <li>• Local and regional philanthropic organizations</li> <li>• Anchor institutions</li> <li>• Service providers</li> <li>• Tacoma Housing Authority</li> <li>• Pierce County</li> <li>• Persons experiencing homelessness</li> </ul>
<b>ACTION 1.12</b> Explore opportunities for increased staff support during the development review process.			
<ul style="list-style-type: none"> <li>• Assess existing staff capacity to accommodate increased development, including new affordable housing development.</li> <li>• Identify ways to increase existing staff capacity to handle increased workload, such as creating “embedded” staff positions; creating a project expeditor; or using contract labor to assist with heavier workloads.</li> <li>• Identify ways to offset costs related to hiring new staff or expanding capacity through contract labor.</li> </ul>	Short-term (3–4 years)  Medium-term (4–6 years)	City Manager’s Office	<ul style="list-style-type: none"> <li>• Planning and Development Services Department</li> <li>• Fire Department</li> <li>• Community and Economic Development Department</li> <li>• Public Works Department</li> <li>• Local and regional developers</li> </ul>

Note: An asterisk (\*) denotes a priority action among Technical Advisory Group members.

**Exhibit 9 Strategic Objective 2: Actions to Keep Housing Affordable and In Good Repair**

HOW WILL THIS ACTION BE IMPLEMENTED?	WHEN WILL WORK HAPPEN?	WHO CAN LEAD IMPLEMENTATION?	WHO CAN ASSIST WITH IMPLEMENTATION?
<b>ACTION 2.1</b> Develop a system to address derelict properties.			
<ul style="list-style-type: none"> <li>Continue to identify changes to the City and state legal framework that would streamline access to derelict properties.</li> <li>Consider legislative changes to the City's local nuisance and building laws to provide better access to derelict properties.</li> <li>Advocate for changes to state law that create more tools and resources to address derelict properties.</li> <li>Work with private financial institutions, like banks, to identify candidates to rehabilitate and resell to qualified buyers.</li> <li>Work with Tacoma Public Utilities to identify properties at-risk of losing utility services and target outreach to property owners (via code compliance) accordingly.</li> </ul>	<p>Immediate (1–2 years)</p>	<p>Neighborhood and Community Services Department</p>	<ul style="list-style-type: none"> <li>Community and Economic Development Department</li> <li>Local and regional nonprofits</li> <li>Private financial institutions</li> <li>Tacoma Public Utilities</li> <li>Faith-based institutions</li> </ul>
<b>ACTION 2.2</b> Develop and adopt a preservation ordinance.			
<ul style="list-style-type: none"> <li>Establish a preservation working group (with representation from City staff and key stakeholders, including tenants' groups, landlords, and the development community) to coordinate the City's work on affordable housing preservation.</li> <li>Identify clear priorities for the City's preservation efforts (e.g., preventing displacement, protecting specific vulnerable groups, maintaining affordability near transit or high-performing schools).</li> <li>Develop draft legislative language.</li> <li>Establish preservation policy.</li> </ul>	<p>Immediate (1–2 years)</p>	<p>Tacoma City Council</p>	<ul style="list-style-type: none"> <li>Community and Economic Development Department</li> <li>Office of Equity and Human Rights</li> <li>Property owners</li> <li>Tenants</li> <li>Local and regional nonprofits</li> <li>Cultural organizations</li> <li>Tacoma Housing Authority</li> </ul>
<b>ACTION 2.3</b> Target existing resources to improve the livability of existing owner-occupied homes.			
<ul style="list-style-type: none"> <li>Create set-aside for referrals from code enforcement (within existing federally funded programs).</li> <li>Establish an internal process to connect homeowners to resources (via code enforcement).</li> <li>Partner with nonprofit organizations to conduct targeted outreach to older adults and persons living with disabilities to increase their participation in existing tax relief and energy efficiency programs.</li> </ul>	<p>Immediate (1–2 years)</p>	<p>Community and Economic Development Department</p> <p>Neighborhood and Community Services Department</p>	<ul style="list-style-type: none"> <li>Property owners</li> <li>Tacoma Public Utilities</li> <li>Local and regional nonprofits</li> <li>Homeowners</li> </ul>
<b>ACTION 2.4</b> Improve tracking and monitoring of existing subsidized and unsubsidized affordable housing properties.			
<ul style="list-style-type: none"> <li>Used publicly available tools, like the National Housing Preservation Database, to start tracking properties with expiring subsidies.</li> <li>Engage academic institutions and other entities that could help operate an “early warning” system.</li> <li>Work with stakeholders to define the system's focus, including housing types and geographic areas to be tracked (in coordination with preservation ordinance).</li> <li>Collect and regularly update data from local, state, and federal sources to create an inventory of existing affordable properties.</li> <li>Share information about at-risk properties to guide deployment of public preservation funding and technical assistance.</li> <li>Conduct outreach to existing property owners of subsidized and unsubsidized properties to discuss financial needs.</li> <li>Direct existing federal or regional resources to provide interim financing options to property owners.</li> <li>Update at-risk property inventory on a regular basis.</li> </ul>	<p>Immediate (1–2 years)</p> <p>Short-term (3–4 years)</p>	<p>Community and Economic Development Department</p> <p>Anchor institutions (academic)</p>	<ul style="list-style-type: none"> <li>Property owners</li> <li>Tenants</li> <li>Washington State Finance Commission</li> <li>U.S. Department of Housing and Urban Development Regional Office</li> </ul>

Note: An asterisk (\*) denotes a priority action among Technical Advisory Group members.

Continued on the following page

**Exhibit 9 Strategic Objective 2: Actions to Keep Housing Affordable and In Good Repair (cont.)**

HOW WILL THIS ACTION BE IMPLEMENTED?	WHEN WILL WORK HAPPEN?	WHO CAN LEAD IMPLEMENTATION?	WHO CAN ASSIST WITH IMPLEMENTATION?
<b>ACTION 2.5</b> Explore creation of a proactive rental inspection program.			
<ul style="list-style-type: none"> <li>• Apply lessons from code compliance pilot program to determine need for additional study on the design and implementation of rental inspection programs in other jurisdictions.</li> <li>• Design proactive rental inspection program, including staffing needs, fee structure, inspection schedule, ways to connect persons to existing or new resources, and culturally competent practices.</li> <li>• Solicit input on the program design from a range of stakeholders (e.g., landlords, tenants’ groups, local nonprofits and cultural organizations, City staff, etc.).</li> <li>• Establish and administer proactive rental inspection program.</li> </ul>	Short-term (3–4 years)	Neighborhood and Community Services Department	<ul style="list-style-type: none"> <li>• Community and Economic Development Department</li> <li>• Property owners and managers</li> <li>• Tenants’ rights organizations</li> <li>• Local and regional nonprofits</li> <li>• Cultural organizations</li> </ul>
<b>ACTION 2.6</b> Facilitate efforts to create a community land trust.			
<ul style="list-style-type: none"> <li>• Work with lead entity and local organizations to determine organizational and operational decisions that will shape the land trust’s overall structure and geographic service area.</li> <li>• Identify land throughout Tacoma suitable for donation or strategic acquisition, using the public land inventory created through the City’s forthcoming public land study by Forterra.</li> </ul>	Short-term (3–4 years)	Local and regional nonprofits	<ul style="list-style-type: none"> <li>• Community and Economic Development Department</li> <li>• Public Works Department</li> <li>• Forterra</li> <li>• Cultural organizations</li> <li>• Residents living in target areas for community land trust</li> </ul>
<b>ACTION 2.7</b> Create a housing preservation fund.			
<ul style="list-style-type: none"> <li>• Convene an advisory group of local partners to articulate the potential uses of the fund (in coordination with other preservation activities).</li> <li>• Work with private-sector and philanthropic partners and developers to develop the fund’s guidelines.</li> <li>• Provide municipal funding as part of capitalizing the preservation fund.</li> <li>• Conduct outreach to existing property owners and local nonprofits about using this resource.</li> </ul>	Medium-term (5–6 years)	Private financial institutions  Local and regional philanthropic organizations	<ul style="list-style-type: none"> <li>• Community and Economic Development Department</li> <li>• Local and regional nonprofits</li> <li>• Local and regional developers</li> <li>• Property owners</li> <li>• Residents living at target properties</li> </ul>

*Note: An asterisk (\*) denotes a priority action among Technical Advisory Group members.*

**Exhibit 10 Strategic Objective 3: Actions to Help People Stay in Their Homes and Communities**

HOW WILL THIS ACTION BE IMPLEMENTED?	WHEN WILL WORK HAPPEN?	WHO CAN LEAD IMPLEMENTATION?	WHO CAN ASSIST WITH IMPLEMENTATION?
<b>ACTION 3.1</b> Expand tenants’ protections through a comprehensive policy.*			
<ul style="list-style-type: none"> <li>• Coordinate additional policy provisions with the Office of Equity and Human Rights.</li> <li>• Establish an enforcement structure, leveraging relationships at existing cultural and nonprofit organizations.</li> <li>• Coordinate with local, regional, and state organizations to provide education, resources, and legal advice and representation to tenants.</li> <li>• Make information on tenants’ rights available in multiple languages.</li> <li>• Convene tenants, landlords, property managers, and other stakeholders on a semi-regular basis to understand effectiveness of tenant protections and identify adjustments to the policy or enforcement structure (as needed).</li> </ul>	<p>Immediate (1–2 years)</p>	<p>Tacoma City Council</p>	<ul style="list-style-type: none"> <li>• Office of Equity and Human Rights</li> <li>• Fair Housing Center of Washington</li> <li>• Washington State Tenants’ Union</li> <li>• Cultural organizations</li> <li>• Tacoma Housing Authority</li> <li>• Landlords</li> </ul>
<b>ACTION 3.2</b> Create a range of resources for households experiencing a housing crisis.			
<ul style="list-style-type: none"> <li>• Identify and allocate general fund dollars for emergency housing assistance to support short-term housing and utility payments and legal assistance in the next budget cycle.</li> <li>• Explore and identify a dedicated source (or sources) of funding for emergency housing assistance.</li> <li>• Work with cultural and nonprofit organizations to publicize available assistance and generate referrals.</li> <li>• Establish process for accessing some resources (e.g., relocation assistance) through a comprehensive tenant protections policy.</li> </ul>	<p>Immediate (1–2 years)</p>	<p>Tacoma City Council</p>	<ul style="list-style-type: none"> <li>• Office of Equity and Human Rights</li> <li>• Fair Housing Center of Washington</li> <li>• Washington State Tenants’ Union</li> <li>• Cultural organizations</li> <li>• Tacoma Housing Authority</li> <li>• Landlords</li> </ul>
<b>ACTION 3.3</b> Work with partners to increase community organizing efforts (including for tenants’ rights).			
<ul style="list-style-type: none"> <li>• Solicit organizing expertise, including working with community leaders to solicit private or philanthropic funding to support leadership development, seed grants, etc.</li> <li>• Actively participate in organizing efforts with community members.</li> <li>• Work with organized groups to disseminate information about existing housing programs and resources.</li> <li>• Work with organized groups to gather information to improve existing housing programs or resources (as necessary).</li> </ul>	<p>Immediate (1–2 years)</p>	<p>Office of Equity and Human Rights</p>	<ul style="list-style-type: none"> <li>• Faith-based institutions</li> <li>• Fair Housing Center of Washington</li> <li>• Washington State Tenants’ Union</li> <li>• Cultural organizations</li> <li>• Tacoma Housing Authority</li> </ul>
<b>ACTION 3.4</b> Create a source of local tax relief to stabilize more low-income homeowners.			
<ul style="list-style-type: none"> <li>• Commission study to understand costs of extending various forms of tax relief to homeowners (e.g., property owners whose assessed taxes increased by a certain percentage).</li> <li>• Use study findings to design a local tax relief program or other tools.</li> <li>• Actively conduct outreach to long-time homeowners to participate in local tax relief programs.</li> </ul>	<p>Short-term (3–4 years)</p>	<p>Tacoma City Council</p>	<ul style="list-style-type: none"> <li>• Office of Management and Budget</li> <li>• Nonprofit organizations</li> <li>• Cultural organizations</li> <li>• Community and Economic Development</li> <li>• Pierce County Tax Assessors’ Office</li> </ul>

Note: An asterisk (\*) denotes a priority action among Technical Advisory Group members.

**Exhibit 11 Strategic Objective 4: Actions to Reduce Barriers for People Who Often Encounter Them**

HOW WILL THIS ACTION BE IMPLEMENTED?	WHEN WILL WORK HAPPEN?	WHO CAN LEAD IMPLEMENTATION?	WHO CAN ASSIST WITH IMPLEMENTATION?
<b>ACTION 4.1</b> Streamline processes for households applying for and using rental assistance.			
<ul style="list-style-type: none"> <li>• Provide additional funding to increase the availability of peer navigators to assist people applying for and using housing assistance, including gathering specific information about housing needs and preferences or documents.</li> <li>• Investigate common issues that people encounter when applying for housing assistance, such as screening requirements or unattainable security deposits.</li> <li>• Work with landlords and higher barrier populations to identify more flexible screening requirements (based on research of common barriers).</li> <li>• Increase participation in Pierce County’s Landlord Liaison Program by conducting direct outreach to landlords.</li> <li>• Create and maintain a central database of participating landlords (in conjunction with creation of the City’s “early warning” system to assist with preservation activities).</li> </ul>	<p>Immediate (1–2 years)</p>	<p>Tacoma Housing Authority</p>	<ul style="list-style-type: none"> <li>• Human Services, Pierce County</li> <li>• Service providers</li> <li>• Cultural organizations</li> <li>• Community Development and Economic Development</li> <li>• Office of Equity and Human Rights</li> <li>• Landlords</li> </ul>
<b>ACTION 4.2</b> Create stronger alignment across the Tacoma-Lakewood-Pierce County Continuum of Care.			
<ul style="list-style-type: none"> <li>• Develop an annual set of common goals, priority populations, and funding priorities.</li> <li>• Work with service providers to audit existing administrative requirements and identify conflicting or burdensome requirements.</li> <li>• Develop common language that can be used in contracts among service providers working within the region (based on the findings from the audit).</li> <li>• Convene local and regional partners to discuss interest in creating a broader regional initiative around regional housing affordability, including homelessness.</li> <li>• Establish a cross-sector regional initiative to address regional housing affordability.</li> </ul>	<p>Immediate (1–2 years)</p> <p>Long-term (7+ years)</p>	<p>Neighborhood and Community Services (in partnership with other jurisdictions in the Continuum of Care)</p>	<ul style="list-style-type: none"> <li>• Human Services, Pierce County</li> <li>• City of Lakewood</li> <li>• Service providers, including those participating in Coordinated Entry</li> <li>• Community Development and Economic Development</li> <li>• Tacoma City Council</li> </ul>
<b>ACTION 4.3</b> Integrate culturally competent and trauma-informed practices into new and existing programs.			
<ul style="list-style-type: none"> <li>• Audit City programs to identify ways to incorporate culturally competent and trauma-informed practices and make adjustments as necessary.</li> <li>• Sponsor semi-regular trainings on cultural competence.</li> <li>• Develop a pool of staff or contractors with demonstrated experience in culturally competent and trauma-informed practices.</li> <li>• Include cultural competency as selection criteria for service providers receiving public funding.</li> </ul>	<p>Immediate (1–2 years)</p> <p>Ongoing</p>	<p>Office of Equity and Human Rights</p>	<ul style="list-style-type: none"> <li>• Neighborhood and Community Services</li> <li>• Community and Economic Development</li> <li>• Service providers</li> <li>• Cultural organizations</li> <li>• Tacoma Housing Authority</li> </ul>
<b>ACTION 4.4</b> Earmark a portion of new or expanded sources of local funding to provide support services in new development.			
<ul style="list-style-type: none"> <li>• Include services as a potential use for the Tacoma Housing Trust Fund.</li> <li>• Create set-aside within the Tacoma Housing Trust Fund for support services in subsidized projects.</li> <li>• Develop selection process and criteria to award funding to new development projects.</li> <li>• Conduct outreach to developers about the availability of this funding, including how to apply for it.</li> </ul>	<p>Short-term (3–4 years)</p> <p>Ongoing</p>	<p>Community and Economic Development</p>	<ul style="list-style-type: none"> <li>• Neighborhood and Community Services</li> <li>• Service providers</li> <li>• Cultural organizations</li> <li>• Local and regional developers</li> <li>• Tacoma Housing Authority</li> </ul>

Note: An asterisk (\*) denotes a priority action among Technical Advisory Group members.





**To:** Planning Commission  
**From:** Reuben McKnight, Planning Services Division  
**Subject:** **Historic Preservation Code Amendments – Public Comments and Staff Responses**  
**Meeting Date:** May 29, 2019  
**Memo Date:** May 22, 2019

**Action Requested:**  
Guidance.

**Discussion:**

At the meeting on May 29, 2019, the Planning Commission will review public comments on the subject of “Historic Preservation Code Amendments” that were received during the public hearing process in April-May for the 2019 Amendment. The subject of “Historic Preservation Amendments” includes code language creating an expanded and enhanced demolition review process, improvements to the Historic Conditional Use Permit, and improvements to the nomination and designation process to the Tacoma Register of Historic Places. Attached to facilitate the Commission’s review and providing feedback is a staff report that summarizes the public comments and staff’s response.

**Project Summary:**

The objective of these amendments is to make general process improvements and clarifications to the body of regulations affecting historic preservation activities in Tacoma, as well as to address current gaps in the permit process for addressing impacts to cultural and historic sites resulting from development activities. These amendments are the product of several years of discussion including community stakeholders, the Landmarks Commission, and others.

**Prior Actions:**

- June 6, 2018 – the Planning Commission conducted a public hearing on the 2019 Amendment applications and accepted comments on this item.
- June 20, 2018 – the Planning Commission accepted this application into the 2019 Work Program, concluded the scoping process, and directed staff to begin analysis.
- August 8, 2018 – the Landmarks Preservation Commission began deliberations and code development.
- September 19, 2018 – staff provided a briefing to the Planning Commission.
- December 12, 2018 – the Landmarks Preservation Commission issued a recommendation to the Planning Commission.
- January 16, 2019 – staff provided a briefing to the Planning Commission on the proposed amendments.
- February 20, 2019 – staff provided a communication item regarding the proposed amendments addressing questions from the Commission



**Prior Actions (continued):**

- March 6, 2019 – Planning Commission authorized the release of the proposed amendments for public review
- May 15, 2019 – Planning Commission held a public hearing on the proposed amendments

**Staff Contact:**

- Reuben McKnight, Historic Preservation Officer, [reuben.mcknight@cityoftacoma.org](mailto:reuben.mcknight@cityoftacoma.org), or 253-591-5220.

**Attachment:**

- Historic Preservation Code Amendments – Public Comments and Staff Responses Report
  - Exhibit “A” to the Report – Written Comments Received

c. Peter Huffman, Director



## Public Comments and Staff Responses and Suggestions

2019 Amendments to the Comprehensive Plan and Land Use Regulatory Code

### A. Subject: Historic Preservation Code Amendments

### B. Staff Note:

The Planning Commission conducted a public hearing on the subject on May 15, 2019. No testimony was received. Staff has received five pieces of written comments during the public review process. Summarized below are the comments and staff's responses. Staff does not recommend any modification to the proposed amendments.

Key	Comment	Commenters	Staff Response
<b>Application: Historic Preservation Code Amendments</b>			
1	Historic Tacoma supports the demolition review process proposal, including a focus on Mixed Use Centers and National Register Historic Districts. Historic Tacoma would like to see the 4,000 SF threshold lowered in the future. The demolition review process may also encourage better geographic distribution of City Landmarks.	Brooker	Comments noted.
2	Supports the Historic Preservation Code Amendments.	Bond	Comments noted.
3	North Slope Historic District Association supports the demolition review process. The District would like to see the square foot threshold lowered in the future and would like the single family exemption removed in the future as well, but supports the amendment as a first step.	Cade	Comments noted.
4	Supports the Historic Preservation Code Amendments, because it will help preserve smaller buildings.	Turner	Comments noted.

Key	Comment	Commenters	Staff Response
5	Would like to see protection for single family homes in Old Town, and would like to see specific historic protections in Old Town, such as the Old Town Historic District that was proposed in 2010.	Ward	Comments noted. The square foot threshold and exemption of single family residential buildings in the proposed demolition review process was intentional, as the amendments are attempting to seek a balance between regulation and efficient review processes. The Old Town Historic District proposal was received by the Landmarks Preservation Commission in 2010, and was met with extreme public opposition when public comment was solicited. Due to the level of opposition, the Commission halted further consideration of the proposal. That was the second time that Old Town had been proposed for local district status and rejected due to significant public opposition. In general, local residential historic districts are neighborhood-led initiatives. Staff does not recommend any changes to the proposed amendments at this time.

**C. Exhibit:**

Exhibit “A” – Written Comments Received



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Board of Directors

- Kathleen Brooker
Don Erickson
Gary Knudson
Marshall McClintock
Jennifer Mortensen
Rick Semple
Steve Treffers

Staff

- Michael Lafreniere,
Outreach &
Communications Director

May 6, 2019

Tacoma Planning Commission
747 Market Street, Room 349
Tacoma, WA 98402

Dear Chair Wamback and Commissioners,

Historic Tacoma enthusiastically supports the proposed citywide demolition review process as outlined in Historic Preservation Code Amendments. Our organization was founded in 2007 in part to advocate for just such a review process. While not perfect, the proposed review process is a substantial step toward realizing the demolition review goals outlined in HP-21 of the Historic Preservation element of the One Tacoma Comprehensive Plan as well as other comprehensive plan goals, such as DD-4.1, DD-6.7, DD-7.1, DD-13.1, and DD-13.3.

The proposed review process appropriately focuses on Mixed-Use Centers, which are mostly located in the city's historic commercial districts, such as Hilltop, McKinley, Lincoln, Proctor, South Tacoma, and Stadium, and where intense development is planned if not already occurring. The proposal also recognizes the significance of the city's National Register Historic Districts that otherwise receive no protection. The 4000 SF minimum for buildings outside these sensitive areas is a reasonable starting point for introducing this review process. In time we hope to see that minimum size lowered and include residences as well as architecturally significant features, such as parapets and ornamentation, on significant buildings.

We also see the demolition review process as one way to help mitigate Tacoma's geographic imbalance of listed historic landmarks. The current landmark nomination process is largely owner driven, resulting in a preponderance of listed landmarks in the city's North End that reflects economic and educational disparities as opposed to the distribution of historically important buildings in the city. The proposed demolition review process will help identify and protect historic buildings across all the city.

Sincerely,

[Handwritten signature of Kathleen Brooker]

Kathleen Brooker
Chair

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@HistoricTacoma

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Mailing Address

PO Box 7664
Tacoma, WA 98417

May 17, 2019

Lihuang Wung  
Planning and Development Services  
City of Tacoma  
747 Market Street, Room 345  
Tacoma, WA 98402

Dear Planning Commissioners,

We would like to recommend to you the Historic Preservation Code Amendments in this year's Comprehensive Plan Amendments. This piece of the 2019 Code Amendments is important to our city's future because the history of Tacoma is important, something that is fundamental to the city's culture.

Please vote to send the Historic Preservation Code Amendments on to the City Council, intact, and do your part to save a bit more of Tacoma's past.

Thank you,

Roy and Paula Bond  
407 North E Street  
Tacoma, WA 98403



# North Slope Historic District

a 501 (c)(3) organization

908 North M St.  
Tacoma WA 98403

May 6, 2019

**BOARD OF DIRECTORS**

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ALEX STRAUB

Tacoma Planning Commission  
747 Market Street, Room 349  
Tacoma, WA 98402

Dear Chair Wamback and Commissioners,

The North Slope Historic District supports the proposed citywide demolition review process as outlined in Historic Preservation Code Amendments. While our historic district already has a high level of demolition review appropriate to its city landmark status, we have noted with sadness the continuing loss of Tacoma's historic buildings across the city. This proposal will at least allow an opportunity for a pause and public deliberation when a historic building is slated for demolition. This is especially needed in the Mixed-Use Centers that were established mostly in the city's old neighborhood commercial areas, such as Hilltop, Lincoln, Proctor, and Stadium where more development is planned. The proposal is not perfect but a good first step. In time we would like to see the minimum building size for review lowered and to include residences as well.

Sincerely,

Deborah Cade  
Chair

May 11, 2019

Lihuang Wung  
Planning and Development Services  
City of Tacoma  
747 Market Street, Room 345  
Tacoma, WA 98402

Dear Planning Commissioners,

We would like to recommend to you the Historic Preservation Code Amendments in this year's Comprehensive Plan Amendments. This piece of the 2019 Code Amendments is important to our city's future because the history of Tacoma is important. *We need to save some of it to point us to the future.*

In the mid-1990s, when a few of us from my neighborhood began to look at making an historic district here, we learned a great deal about how Tacoma happened to have such a rich supply of historic buildings downtown. We were told that Urban Renewal passed us by in the 1960s, and left behind a wealth of old buildings from Tacoma's beginnings. How lucky we all were! And, now we can be lucky again, saving pieces of our city's history by saving old homes.

The Historic Preservation Amendments will now help us also preserve smaller buildings and homes that belonged to early residents in Tacoma. It is important for us to know about and remember how these ordinary people contributed to the building of the city we all live in today. By appreciating their efforts and honoring their accomplishments we can develop the path we should take now to advance efforts to provide for all Tacoma's citizens in a respectful way.

Please vote to send the Historic Preservation Code Amendments on to the City Council, intact, and do your part to save a bit more of Tacoma's past homes – all of them still standing after about 100 years. *Their stories point the way forward.*

Thank you for serving all of Tacoma's citizens,

Julie and Jay Turner

817 North J St.

Tacoma, WA 98403

**From:** [Ward Family](#)  
**To:** [Planning](#)  
**Subject:** Historical Preservation Code  
**Date:** Friday, May 17, 2019 4:50:56 PM

---

Dear Commissioners,

I am concerned that there is no protection in place for single family homes in the Old Town area and they can be demolished and replaced by homes that don't fit the feeling of the area. I understand that the majority of the homes in Old Town do not have substantial individual historical significance but collectively they represent the early history of Tacoma.

That part of our history should be preserved.

I know it can be more cost effective to demolish and rebuild but I would like the commission to consider putting some sort of protection in place that could limit the number of modern houses in an area and that on a lot where a home 50 years or older stood the new build would have to have a similar architectural style.

I believe around 2010 there was a movement to designate Old Town as a historic district. At that time there was a deluge of misinformation distributed by those leading the opposition. I believed it. We were told by the commissioner facilitating the final meeting at that time that just by virtue of the name Old Town that the area would be protected and we did not have to worry about the integrity of the community being destroyed.

Unfortunately this is not the case as homes well over 50-60 plus years and older are being bulldozed and oversized ,modern misfit houses fill the lots. I am afraid that if there are not some restrictions on the type of homes this neighborhood and others like it across the city that are not designated historic districts will be lost forever. People will laugh at our OLD TOWN that will be a collection of modern houses on a hillside. That should not be part of Tacoma's vision.

Thank you,  
Denise Ward  
wardfam4@gmail.com





**To:** Planning Commission  
**From:** Lihuang Wung, Planning Services Division  
**Subject:** **Manitou Potential Annexation – Public Comments and Staff Responses**  
**Meeting Date:** May 29, 2019  
**Memo Date:** May 22, 2019

**Action Requested:**

Guidance.

**Discussion:**

At the meeting on May 29, 2019, the Planning Commission will review public comments on the subject of “Manitou Potential Annexation” that were received during the public hearing process in April-May for the 2019 Amendment. The subject of “Manitou Potential Annexation” primarily refers to the two options of the proposed zoning schemes for the Manitou Potential Annexation Area (PAA). Attached to facilitate the Commission’s review and providing feedback is a staff report that summarizes the public comments and staff’s response.

**Project Summary:**

Pierce County and the City of Tacoma are conducting a collaborative planning effort for the proposed annexation of the Manitou PAA, located at the southwest corner of the City near Lakewood Dr. W. and 66<sup>th</sup> St. W. Planning for the Manitou annexation is currently proceeding on two tracks: (1) Interlocal Agreement, and (2) Proposed Zoning.

About the first track, the City is getting ready to negotiate the interlocal annexation agreement with Pierce County. Upon completion of the negotiation and approval of the agreement by County and City councils, the City will consider an ordinance to set the effective date for the annexation, which is likely to be in late 2019 or early 2020.

The second track pertains to the proposed zoning to be applied to the Manitou area if and when the annexation becomes effective. There are two options of the proposed zoning schemes. There may be a third option for the Commission’s consideration, based on public comments received, as shown in the attached staff report.

For more information, please visit [www.cityoftacoma.org/Manitou](http://www.cityoftacoma.org/Manitou).

**Prior Actions:**

- July 18, 2018 – Reviewed scope of work
- November 7, 2018 – Reviewed Proposed Zoning Option 1
- February 6, 2019 – Reviewed Proposed Zoning Option 2, and released both options for public review
- May 15, 2019 – Conducted Public Hearing No. 2 for some applications of the 2019 Amendment, including the Application of “Manitou Potential Annexation”



**Staff Contact:**

- Lihuang Wung, Senior Planner, [lwung@cityoftacoma.org](mailto:lwung@cityoftacoma.org), (253) 591-5682

**Attachment:**

- Manitou Potential Annexation – Public Comments and Staff Responses Report
  - Exhibit “A” to the Report – Oral testimony Received
  - Exhibit “B” to the Report – Written Comments Received

c. Peter Huffman, Director



**A. Subject: Manitou Potential Annexation**

**B. Staff Note:**

The Planning Commission released two options (Options 1 and 2) of the proposed zoning schemes for the Manitou Area for public review, in preparation for the public hearing on May 15, 2019. Public comments seem to prefer a third option (Option 3).

<p><b>Option 1</b></p>	<p><b>Option 2</b></p>	<p><b>Option 3</b></p>
<ul style="list-style-type: none"> <li>• <b>R-2</b> for single-family residential areas</li> <li>• <b>R-4L</b> for multi-family residential areas (including the mobile homes)</li> <li>• <b>C-1</b> for non-auto related commercials</li> <li>• <b>C-2</b> for auto-related commercials</li> <li>• <b>STGPD</b> overlay</li> </ul>	<ul style="list-style-type: none"> <li>• <b>R-3</b> for single-family residential areas</li> <li>• <b>R-4L</b> for multi-family residential areas (including the mobile homes)</li> <li>• <b>C-1</b> for commercial areas</li> <li>• <b>STGPD</b> overlay</li> </ul>	<ul style="list-style-type: none"> <li>• <b>R-2</b> for single-family residential areas</li> <li>• <b>R-4L</b> for multi-family residential areas (including the mobile homes)</li> <li>• <b>C-1</b> for commercial areas</li> <li>• <b>STGPD</b> overlay</li> </ul>
<p><b>Notes:</b></p>	<p><b>Notes:</b></p>	<p><b>Notes:</b></p>
<ul style="list-style-type: none"> <li>• Significant down zone from current Mixed-Use District (60-ft height allowed)</li> <li>• Down zone from previous designations adopted in 2004, where there was no C-1</li> <li>• R-2 consistent with surrounding neighborhood</li> </ul>	<ul style="list-style-type: none"> <li>• Significant down zone from current Mixed-Use District (60-ft height allowed)</li> <li>• Further down zone from previous designations adopted in 2004, where there was no C-1</li> <li>• R-3 provides more opportunities for missing middle housing on large lots</li> <li>• C-1 makes vehicle sales nonconforming to use and vehicle repairs nonconforming to some development standards</li> </ul>	<ul style="list-style-type: none"> <li>• Significant down zone from current Mixed-Use District (60-ft height allowed)</li> <li>• Further down zone from previous designations adopted in 2004, where there was no C-1</li> <li>• R-2 consistent with surrounding neighborhood</li> <li>• C-1 makes vehicle sales nonconforming to use and vehicle repairs nonconforming to some development standards</li> </ul>

### C. Public Comments and Staff Responses:

No.	Comment	Commenters	Staff Notes and Responses
1.	Support annexation.	Nichols; Dergan; Freeman; Abbott (Joseph and John)	<ul style="list-style-type: none"> <li>Some of the reasons indicated by commenters included better City services and opportunity for sewer hook-up.</li> </ul>
2.	Opposed to annexation.	Rangel	<ul style="list-style-type: none"> <li>Commenter indicated that a previous annexation attempt in late 1990s had already been turned down.</li> </ul>
3.	Support Option 1.	McDonald	<ul style="list-style-type: none"> <li>Comment noted.</li> </ul>
4.	Support Option 1, but suggest changing C-2 to C-1.	White; Dergan; Jones; Smith	<ul style="list-style-type: none"> <li>Commenters preferred C-1 in order to keep commercials at neighborhood level. Commenters also suggested the R-2 in Option 1 would help maintain the character of the single-family neighborhood.</li> </ul>
5.	Support Option 1, with C-2.	Medley	<ul style="list-style-type: none"> <li>Commenter suggested that C-2 would allow automobile related services to continue (otherwise non-compliant as with the C-1 in Option 2).</li> <li>Staff notes that the use of “vehicle rental and sales” is prohibited in C-1 but permitted in C-2, while the use of “vehicle service and repair” is allowed in both C-1 and C-2, subject to development standards as set forth in TMC 13.06.510.E.</li> </ul>
6.	Support Option 2, with R-3.	Nichols	<ul style="list-style-type: none"> <li>Commenter indicated that the R-2 designation in Option 1 is a significant down zone from the current Mixed Use District designation which allows 60 foot residential buildings, while R-3 in Option 2 would not significantly impact the current residential area but would begin to meet the goal of creating more opportunities for missing middle housing.</li> </ul>
7.	No C-2 in the area.	Freeman	<ul style="list-style-type: none"> <li>Commenter did not clearly indicate which option is preferred.</li> </ul>

No.	Comment	Commenters	Staff Notes and Responses
8.	C-1 would be more compatible with the South Tacoma Groundwater Protection District (STGPD).	Dergan	<ul style="list-style-type: none"> <li>• Pursuant to TMC 13.09, the STGPD is an overlay zoning and land use control district specifically designed to prevent the degradation of groundwater in the South Tacoma aquifer system by controlling the handling, storage and disposal of hazardous substances by businesses.</li> <li>• The STGPD program is intended to help protect the City of Tacoma's drinking water. The STGPD area is located above the South Tacoma aquifer and can provide the City up to 40% of its drinking water, particularly in the summer.</li> <li>• Administered by the Tacoma-Pierce County Health Department, the STGPD program regulates businesses with aboveground or underground storage tanks and/or hazardous substances at regulated quantities, and/or stormwater infiltration units. Private homes are not regulated.</li> <li>• Commenter's statement about C-1 being more compatible with the STGPD is arguably fair, because C-1 is intended to contain lower intensity land uses of smaller scale than C-2. However, the STGPD requirements apply to all businesses located within the district, regardless of the underlying zoning districts the businesses are subject to. The impacts of businesses to groundwater protection depend primarily on the type and operations of the business and need to be further analyzed, and properly mitigated, on a business-by-business basis.</li> </ul>
9.	County's current land use designation of Mixed-Use District is a big concern.	White; Dergan	<ul style="list-style-type: none"> <li>• Pierce County currently regulates land and building in the Manitou Potential Annexation Area under the Mixed-Use District (MUD) designation.</li> <li>• MUD allows a broad variety of mid-density residential, commercial, and industrial land uses, including multi-family housing, nursing homes, mobile home parks, day-care centers, sewage collection facilities, offices, agricultural supply, malls, restaurants and bars, auto sales, and contractor yards.</li> <li>• Up to 60-foot-tall buildings could be permitted with the uses in MUD.</li> <li>• Either Option 1 or Option 2 of the proposed zoning scheme would be more reflective of the existing land use pattern in the area than MUD and more consistent with the City's land use planning for similar neighborhoods.</li> <li>• Either Option 1 or Option 2 would be a relatively significant down zone from MUD, reducing opportunities for some potential development.</li> </ul>

No.	Comment	Commenters	Staff Notes and Responses
10.	Fire and police service must be maintained at the same level upon annexation.	White; Dergan; Smith; Rangel; Abbott (Joseph and John); Bushnell; Estes; Magliocca	<ul style="list-style-type: none"> <li>The Tacoma Fire and Police departments have indicated that public safety services will be maintained at the same level once the area is annexed to the City.</li> </ul>
11.	The area needs sidewalks and safe routes/signage for school kids.	freeman	<ul style="list-style-type: none"> <li>The City's Public Works Department is prepared to address the issues once the annexation becomes effective.</li> </ul>
12.	There are too many apartments. There are more problems when people are living too close.	Husted	<ul style="list-style-type: none"> <li>Comments noted.</li> </ul>
13.	Continue and enhance the outreach to the community for the proposed annexation.	Freeman; White; Dergan; Smith; Rangel; Abbott (Joseph and John); Bushnell; Estes; Magliocca	<ul style="list-style-type: none"> <li>Comments noted and appreciated.</li> </ul>

## D. Exhibits:

### Exhibit "A" - Oral Testimony Received on May 15, 2019

- Two individuals testified

### Exhibit "B" - Written Comments Received through May 17, 2019

- Comments from 5 individuals received at 2019 Amendment Open House on February 21, 2019
- Comments from one individual received at 2019 Amendment Open House on February 25, 2019
- Staff Notes on comments from 9 individuals received at the Manitou Annexation Area Walk-about on April 26, 2019
- E-mail and Letters from 3 individuals on May 5 and May 17, 2019



## Oral Testimony Received

**Event:** Planning Commission Public Hearing No. 2

**Subject:** Manitou Potential Annexation

**Date:** May 15, 2019

1. Heidi White – Ms. White has lived in Manitou for 51 years. She noted that she doesn't care if it is annexed, but she does care about the zoning changes. She stated that she supports option 1, as long as C2 is changed to C1, and the rest is kept R2, with everything else grandfathered in and left as it is now. She explained that it is a community that does not need any big business. They like it the way it is and would not like any more multi-family as it would affect the quality of life in the area. She urged the Commission to listen to the comments the neighborhood has provided.
2. Venus Dergan – Ms. Dergan has lived in Manitou for over 50 years, and has attended almost all the meetings relating to this. She stated that she considers all of the people living in the area her neighbors, and they do not pay attention to the county-city line. She noted that South Tacoma has one of the lowest incomes in the city, so there is low-income homeownership in Manitou currently. She stated that she also supports option 1, with the change from C2 to C1, as it will keep the character of the neighborhood and will be more compatible with the South Tacoma Groundwater Protection District that is proposed. She urged the commission to listen to the people who have spoken.



**I like Option 1, because...**

2/21/19

5. My Name: Geri Jones E-mail: Geri Jones 43 @ Yahoo.comMy Reasons: I WANT OPTION 1 DON'T WANT C-2 IN  
my Neighborhood.

2/21/19

6. My Name: Ron Husted E-mail: nikkentules@comcast.netMy Reasons: Too many apartments as there more problems  
when people are living too close. Just ask police  
The neighborhood is fine as is. w/R-2 areas

2/21/19

7. My Name: Venus Dergan E-mail: Vadergan@yahoo.comMy Reasons: OPTION 1 and eliminate C2 and change  
to C1. Wish to keep the character of the  
neighborhood. Neighbors want single family  
homes & Neighborhood Commercial District

2/21/19

8. My Name: Doug W. McDonald E-mail: dmcDonald328@yahoo.comMy Reasons: I support Option #1 - Thanks

2/21/19

# I like Option 1, because...

9. My Name: Heidi White E-mail: Bathmaid03@AOL.com

My Reasons: It's my area and I would like to have this option, but with C-1 instead of C-2. If this option changes then I would support anyone who would not want to have the annexation happen. Please keep the integrity of our neighborhood the way it is

10. My Name: \_\_\_\_\_ E-mail: \_\_\_\_\_

My Reasons: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

11. My Name: \_\_\_\_\_ E-mail: \_\_\_\_\_

My Reasons: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

12. My Name: \_\_\_\_\_ E-mail: \_\_\_\_\_

My Reasons: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2/25/19

# I like **Option 2**, because...

1. My Name: K. Freeman E-mail: \_\_\_\_\_

My Reasons: ~~is option 2 annexing~~ ~~Annexing?~~ ~~If so,~~

*annexing* I support this. The area needs sidewalks & safe routes/signage for school kids. I suggest the city outreach to that community for input. I would suggest not C-2 on Lakewood Drive, or in area. Not sure I like R-3, currently

this area offers affordable housing. Maybe we don't need to gentrify every neighborhood.

**Staff Notes:**

1. The last two lines are copied from the backside of the comment sheet.
2. The commenter had later clarified that she did not realize the comment card she had used was to indicate the preference for Option 2, which was not necessarily her suggestion. She supports the annexation; she does not suggest C-2; and she believes currently this neighborhood offers affordable housing which is a good thing.

3. My Name: \_\_\_\_\_

My Reasons: \_\_\_\_\_

4. My Name: \_\_\_\_\_ E-mail: \_\_\_\_\_

My Reasons: \_\_\_\_\_

## Manitou Annexation Area Walk-about

- Date/Time:** Friday, April 26, 2019, 4:00 p.m.
- Location:** Meadow Park Office Condos' Parking Lot (Lakewood Dr. W. and 70<sup>th</sup> St. W.)
- Citizens Present:** Heidi White, Venus Dergan, Pennie Smith, Adrian Rangel, Joseph Abbott, John Abbott, and Joe Bushnell
- Staff Present:** Allen Estes (TFD), Todd Magliocca (TFD), and Lihuang Wung (PDS)

### Notes by Lihuang Wung:

1. Due to the low turn-out, attendees agreed to forgo the walk-about; instead, had a conversation at the parking lot.
2. Attendees were disappointed that Council Member Chris Beale was not able to attend due to a last minute conflict.
3. Attendees reviewed Options 1 and 2 of the Proposed Zoning Schemes that had been released by the Planning Commission for public review in preparation for the public hearing on May 15, 2019. Most were concerned about the C-2 designation in Option 1 and the R-3 in Option 2. They would support C-1 for commercial areas, R-2 for single-family areas, and R4-L for multi-family areas, to be compatible with the surrounding neighborhood.
4. Some were concerned about Council Member Beale's proposal (i.e., Option 2) being placed on the Planning Commission's agenda in February 2019, after the Commission had reviewed and released Option 1 in November 2018.
5. County's current land use designation of Mixed-Use District is a big concern.
6. Developers (the Abbotts) having a property in Tacoma, 10 feet from the Manitou area, welcomed the annexation which would allow them to hook up to the City's sewer.
7. Long-time resident (Rangel) opposed to the annexation, indicating a previous annexation attempt in late 1990s had already been turned down.
8. Residents are generally concerned about and interested in septic/sewer issues and wells/water hook-ups.
9. Fire and police services are of primary concern – the same level of service must be maintained upon annexation.
10. Staff needs to do more community outreach before taking the next steps (i.e., Interlocal Agreement and Annexation ordinance).
11. Need to knock on doors and inform single house owners and encourage them to get involved. Businesses (and perhaps renters) don't care; many business owners don't live in the area.

**From:** [Heidi](#)  
**To:** [Planning; vadergan@yahoo.com](mailto:vadergan@yahoo.com)  
**Subject:** Re: Manitou Potential Annexation  
**Date:** Sunday, May 05, 2019 11:52:20 AM

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To whom it may concern:

I am writing in regards to the Potential Manitou Annexation. The only concern I have in regards to the annexation is the proposed zoning. I am not in support of either of the zoning options. What was discussed at the meetings that I have attended is to have option one with C-1 and R-2 with the rest being non-conforming (grandfathered in).

Thank you,

Heidi White, Manitou

# **JASON MEDLEY**

**253-572-2340    JASONMEDLEY65@ME.COM    828 CENTER ST TACOMA WA 98409**

May 17, 2019

Planning Department  
747 Market Street Room 345  
Tacoma WA 98402

To Planning Department/ Lihuang Wung,

I am writing this letter to comment on the Manitou Annexation. I fully understand the reason why Tacoma is annexing the area. My concern is the zoning of the area. The Planning Department sent out an informational letter with two options of the potential zoning. I am asking the city to consider option 1 as the best option for the area. Option 1 allows the area to continue with C2 zoning for automobile related services. I own a property that is and has been auto related for all the years we have owned it. I am concerned that if the zoning changes to C1 as option 2 shows; that I will be non compliant. This property does not really have any other potential uses as the property is now. To remodel, or redevelop this property would also not make sense as it would not be financially viable for cost versus income. This area simply will not produce the kind of rent that it would take to cover the cost.

I was not able to be at the meeting on May 15th for public comment. I am asking you to strongly consider the option that continues to allow the C2 zoning for the area. I will be following up on your decision as related to the zoning. Thank you for your time to read my comments.

Thank you,

Jason Medley

May 17, 2019

Planning Commission  
747 Market St, Room 349  
Tacoma, WA 98402

**Re: Comments on Future Land Use Map; Comprehensive Plan; and Manitou Annexation**

Dear City of Tacoma Planning Commissioners,

Thank you for the opportunity to comment on the 2019 Amendment to the Comprehensive Plan and Land Use Code. My name is Molly Nichols, and I am the Tacoma Program Manager with Futurewise, a statewide nonprofit that prevents urban sprawl and advocates for sustainable and equitable land use policies. Over the past year we have supported tenant organizing for tenant protections and affordable housing in Tacoma. This letter comments on the Future Land Use Map Implementation, the Affordable Housing Action Strategy Incorporation into Comprehensive Plan, and the Manitou Potential Annexation.

**Future Land Use Map Implementation**

**We support the proposed rezones and amendments that make our zoning consistent with Tacoma's comprehensive plan.** As our region grows, we need policies in place for compact and connected neighborhoods to manage the growth and ensure equitable access. The proposed zoning changes create opportunities for more residents to live in transit friendly corridors with more amenities. They also help local commercial districts thrive by bringing more residents closer to small businesses, and they support our public transit systems by bringing more riders to the corridors.

These changes also create more diverse housing options. Most of Tacoma is zoned for single family housing, while the regional growth and mixed-use centers are zoned high density multi-family. These proposed rezones create more opportunities for duplexes, triplexes, townhomes, and small apartment buildings—options that will help to meet the diverse housing needs in our community.

Lastly, the proposed changes also begin to address the impacts of redlining and other historically exclusionary practices. Until 1968 when the Fair Housing Act was passed, people of color were legally excluded from buying homes in certain neighborhoods in Tacoma and across the country. Banks refused to lend money for families to purchase homes, and homeowner associations created restrictive covenants. People of color were cut off from neighborhoods like the North End, with amenities including parks, libraries, grocery stores, strong performing schools, adequate transportation infrastructure, and more. While redlining may no longer be legal, de facto versions of it still occur, and we still live with its legacy. We need changes in policies to begin to reverse past and present harm.

**Affordable Housing Action Strategy Incorporation into Comprehensive Plan**

**We fully support the incorporation of the Affordable Housing Action Strategy into the Housing Element of the City's Comprehensive Plan.** Not only does this update the data in the plan and indicate more urgency and action around this issue, but it also begins to address the impacts of historically inequitable zoning decisions and housing policies.

I do want to highlight two omissions from the Affordable Housing Action Strategy that should be brought into the Comprehensive Plan. Futurewise shared these in September when the Affordable Housing Action Strategy was approved by council, and the items are now part of Resolution 40328 (sponsored by Councilmember Beale).



This resolution has not yet been voted on by City Council, but the contents are worth your consideration in this amendment process.

Resolution 40328 proposes the following: “the Planning Commission should develop a housing racial justice policy in the City’s One Tacoma Comprehensive Plan that establishes that the overarching housing and land use policy of the City is to redress institutionalized racism in past and present housing policies, and vigorously commence efforts toward socioeconomic and racial integration into the fabric of Tacoma’s neighborhoods through zoning, programs, funding and policy.” Our current housing system (including our segregated neighborhoods where people of color have less access to amenities and opportunities) is not an accident, but, as Richard Rothstein argues in *The Color of Law* a direct result of segregationist government policies. It is going to take bold government action to reverse this past and present harm, and this Planning Commission plays a vital role.

**Therefore, Tacoma’s comprehensive plan should more explicitly name the historical inequities of redlining, exclusionary zoning, and restrictive covenants to ensure that communities of color and other residents who have been excluded are directly benefiting from new housing policies.**

We understand there is a proposal to replace the PSRC equity maps currently in the Housing Element of the Comprehensive Plan with the City of Tacoma’s new equity maps. Including this more local and updated data is worthwhile. The plan should include access to the entire Equity Index to reveal the demographics of neighborhoods in relation to opportunity. You might also include historical maps to help track the policies and zoning that have determined our current segregated neighborhoods.

Another opportunity for the Planning Commission is to more explicitly lay out the relationship between affordable housing and transportation, especially public transit, in the Housing Element of the Comprehensive Plan. Transit service was a key factor for the area wide re-zones, and the Comprehensive Plan currently maps transit priority networks, which is excellent. With respect to our housing policy, we need to upzone and pass inclusionary housing policies in frequent transit corridors, for example places ¼ mile from buses that run every 15 minutes. This creates mixed income neighborhoods and ensures low income people can access transportation and other amenities.

We also support amending the Comprehensive Plan to include coordinating public investments with affordable housing, expanding tenant protections (especially Just Cause, which requires a legitimate business reason for a landlord to terminate a tenancy), and prioritizing households with the greatest need. The plan could also name the importance of providing incentives for affordable accessory dwelling units and the reduction or elimination of parking requirements. Unnecessary parking requirements direct investments toward housing cars instead of housing people.

**Manitou Potential Annexation:**

**The Manitou unincorporated area of Pierce County should be annexed to the City of Tacoma**, as provided for in the Growth Management Act. Cities have the authorities to provide good public facilities and services long-term to urban areas. The best option for rezoning is Option 2 which includes an R3 designation instead of the R2 designation in Option 1. The R2 designation is a significant down zone from the current Mixed Use District designation which allows 60 foot residential buildings. R3 would not significantly impact the current residential area, and it would begin to meet the goal of creating more opportunities for missing middle housing.

Thank you for considering these comments and for your service on this commission. If you require additional information, please contact me at 412-216-9659 or email [molly@futurewise.org](mailto:molly@futurewise.org).

Sincerely,

Molly Nichols  
Tacoma Program Manager, Futurewise





**To:** Planning Commission  
**From:** Lihuang Wung, Planning Services Division  
**Subject:** **Minor Plan and Code Amendments – Staff Suggested Modification**  
**Meeting Date:** May 29, 2019  
**Memo Date:** May 22, 2019

**Action Requested:**

Guidance.

**Discussion:**

The “Minor Plan and Code Amendments” application of the 2019 Amendment did not receive any public comment during the Planning Commission’s public hearing process for the 2019 Amendment in April-May 2019. Staff is proposing a modification to the issue relating to “Front Porch into Front Yards”, as shown in the attached staff report. At the meeting on May 29, 2019, the Commission will review the staff suggestion and provide guidance.

**Project Summary:**

The Minor Plan and Code Amendments application includes 25 proposed amendments that are intended to keep information current, address inconsistencies, correct minor errors, and clarify and improve provisions that, through implementation of the *One Tacoma Plan* and administration of the code, are found to be unclear or not fully meeting their intent.

**Prior Actions:**

- June 20, 2018 – Reviewed preliminary scope of work
- February 20, 2019 – Reviewed issues and the associated proposed amendments
- March 6, 2019 – Released the packet for public review
- May 15, 2019 – Conducted Public Hearing No. 2 for some applications of the 2019 Amendment, including the Application of “Minor Plan and Code Amendments”

**Staff Contact:**

- Lihuang Wung, Senior Planner, [lwung@cityoftacoma.org](mailto:lwung@cityoftacoma.org), (253) 591-5682

**Attachment:**

- Minor Plan and Code Amendments – Staff Suggested Modification

c. Peter Huffman, Director





**A. Subject: Minor Plan and Code Amendments**

**B. Staff Note:**

The Planning Commission released the “Minor Plan and Code Amendments” packet that included 25 proposed amendments for public review, in preparation for the public hearing on May 15, 2019. There was no comment received on any of the 25 issues. However, staff is proposing a modification to Issue #13 relating to “Front Porch into Front Yards”, as shown below.

The version released for public review in April-May 2019		The modified version as suggested by staff May 29, 2019	
Subject / Code Sections Amended / Issues and Analysis	Proposed Amendments	Staff Analysis	Modified Proposal
<p><b>13. Front porches into front yards</b></p> <p><b>TMC 13.06.602.A.4.m(9)</b></p> <p>Current regulations allow front porches to extend 8 feet into the required front yard setback. This however does not prevent lots that average their front yard setback to 8 feet or smaller from having their front porch end at the property line.</p>	<p><b>Modify TMC 13.06.602.A.4.m(9), as follows:</b></p> <p>(9) Covered porches which are open on three sides and do not extend above the level of the first floor may project 8-feet into the required front yard setback. <a href="#">If front yard setback averaging is used to establish the front yard setback, then covered porches can extend 8-feet into the front yard setback or extend half the setback distance, whichever is less.</a></p>	<p>The concern is about the front porch getting too close to or built up against the property line, especially when the property has a setback smaller than 8 feet. In many cases, smaller setbacks are established through the Front Yard Setback Averaging method.</p> <p>The public review version of the proposed amendment addresses the situation when the front yard setback is established through the Setback Averaging. However, the calculation of averaging the two adjoining setbacks and taking one half of the averaged setback appears to be confusing and difficult to visualize for users of the code.</p> <p>Since the concern is about the porch getting too close to the property line, staff is suggesting a modified, more straightforward approach, whereby the porch would be required to be at least 2 feet away from the property line, regardless of the required front yard setback of the property. (See the modified language to the right.)</p> <p>It is noted that almost any front porch will have steps extending out from it and those can't cross the property line into the right-of-way and are subject to land use, traffic, real property and ADA reviews and other applicable requirements. This modified proposed amendment would not circumvent such reviews.</p>	<p><b>Modify TMC 13.06.602.A.4.m(9), as follows:</b></p> <p>(9) Covered porches which are open on three sides and do not extend above the level of the first floor may project <a href="#">up to</a> up to 8-feet into the required front yard setback, <a href="#">but must be at least 2 feet away from the property line.</a></p>