



Assessment of Application Planning Commission Determination

July 17, 2019

Application:	View Sensitive Overlay District Code Update/Narrowmoor Neighborhood Area Wide Rezoning.
Applicant:	West Slope Neighborhood Coalition
Summary of Proposal:	<p>A request to amend Tacoma Municipal Code Title 13 to create a new category of View Sensitive Overlay District which would restrict building height to 20 feet. At present the View Sensitive Overlay District restricts building height at 25 feet.</p> <p>There would be a simultaneous area wide rezoning request that would rezone place the Narrowmoor area within the new VSD-20 Overlay District.</p>
Location and Size of Area:	West Slope area approximately 159 acres, encompassing approximately 311 parcels.
Current Land Use and Zoning:	R-1 VSD
Neighborhood Council Area:	West End
Staff Contact:	Larry Harala, (253) 591-5640, lhara@cityoftacoma.org

1. 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. As adopted, the View Sensitive Overlay District applies a uniform height maximum of 25’. In 2019, a height survey was conducted for 330 homes in Narrowmoor, which established that the average current height of the structures is 16.1’.

In 2019, the City adopted allowances for Detached Accessory Dwelling units (DADU) in the R-1 Zoning District. Height limits for DADUs are based on several factors, but ultimately must not exceed the height of the primary structure. This ordinance is cited in the applications as an impetus for the application and community concerns over potential view impacts resulting from increased development pressure.

This request has a substantial background of prior City review. The City of Tacoma examined the area as a potential historic district in 2009. The West Slope Neighborhood Coalition applied to create a conservation district in 2015. Both efforts were ultimately unsuccessful when the City Council opted to deny the proposals. 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.

3. Public Scoping Comments and Staff Responses

The Planning Commission conducted a public scoping hearing on June 19, 2019 on the proposed scope of work for the application, and kept the hearing record open through June 21, 2019 to accept written comments. The following are a summary of the comments received and the corresponding responses from staff:

- **Comment** – 25 comments of support. The comments were general in nature and supportive of the application. No information was presented that makes significant addition to the arguments presented in the application, rather they are generally re-affirming of the application and proposal.

Staff Response: The comments were general comments of support, primarily pertaining to the Narrowmoor area. Staff will note that the conditions of Narrowmoor are not unique citywide.

- **Comment** – 5 comment of opposition. Concerns that the application is too specific in the focus on a single area, concerns that the application will restrict future in-fill development opportunity. Concern that the application is inequitable. Concern that the applicant does not speak for all area residents and the application was made without full consent of the area.

Staff Response: Staff does not concur with the assertion that a limitation of height, whether for view preservation or for general height compatibility, would necessarily limit opportunity for future infill development or have an adverse impact on property affordability. Currently R-3, R4-L zoning districts have a 35 foot height limitation and could easily adapt to a 25 or 20 foot height limitation and still provide opportunity for multi-family development. If in future City of Tacoma land use policies to change the VSD overlay districts, be they 20 or 25 foot limited, should allow opportunity for infill development and even conceivably opportunity for up-zoning, should city policy ever move in that direction.

Regarding the assertion that the application is inequitable, that is a policy level consideration and staff has no opinion on that. Regarding standing of the applicant, staff has verified with the City of Tacoma City Attorney's Office that the applicant does have sufficient standing to make an application. That however does not address the concern of whether or not the way in which outreach to the area has been conducted by the applicant and how individual area residents may have been included or excluded in the decision to make this application.

4. Planning Commission requested information

- Greater exploration of the original intent of the VSD. View Sensitive Area Study exhibit 1. If the Planning Commission deems to accept the application staff will compile a more detailed legislative history. Staff has made requests to the state archives for original minutes and backup material at this time.
- Cross sections of the slope of the area compared to Old Town. This might be possible with the Light Detection and Ranging/Laser Imaging, Detection and Ranging LIDAR data we have currently and staff could work with GIS more on this if the application is accepted by the Planning Commission. See exhibit 2.
- Codes Covenants and Restrictions (CC&Rs) – Provided as exhibit 4

5. Scoping Options

Staff has identified 4 primary options if the Planning Commission chooses to move this application forward. As staff has examined the LIDAR data, several areas with similarity to the application area have been identified. Based on that preliminary evaluation staff recommends option 3, expand the focus to all of the existing VSD area within the City of Tacoma.

Option Analysis:

- a) Accept Application as proposed (Narrowmoor focused). This option would require the least effort and more targeted community engagement. This would include an analysis of the more immediate neighborhoods surrounding Narrowmoor and is unlikely to significantly increase the work load or to broadly expand community engagement needs.
- b) Expand scope of consideration to focus on the entirety of the West End, existing VSD areas (would likely add a few additional areas where there's a concentration of similar circumstances). Expand focus citywide existing VSD areas (see attachment 2). This would significantly increase the need for extensive community engagement as well as consultant services.
- c) Expand focus of the project to consider areas not currently zoned VSD. This may not require more significant effort beyond the work required in option 2, as it would likely focus on the McKinley Hill and Strawberry Hill areas of the City. This option would require a similar level of effort to identify areas where a VSD-20 and VSD-25 would be warranted and to quantify the associated view impact of those height variations given distinct slope topography across the City.

6. Policy Review (supplemental to the May 29 draft Assessment Report)

Following the Commission's Public Hearing on ???, Commissioners raised questions for staff regarding the policy basis for the View Sensitive District. Specifically, Commissioners were concerned that view policies of the One Tacoma Plan are predominantly focuses on public views and scenic areas. In response, staff is providing the following citations of policies that staff believe support the application and the general intent of the View Sensitive District.

- **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 the development.
- **Policy 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.
- **Goal UF-13** Promote the unique physical, social and cultural character Historic Residential Pattern Areas as integral to Tacoma's sense of place.
- **Policy 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.
- **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.

The following Pattern Areas currently utilize View Sensitive District Overlays.

- **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.

- **Pattern Area 3: Pre-War Compact** This is Tacoma’s most historic section of residential development, and also some of the densest neighborhoods in Tacoma, containing homes ranging from pre-1900 to the current era. The street grid is very well connected and blocks tend to be fairly short, supporting a highly walkable environment. This area has a variety of pre-zoning non-conforming lot sizes, prevalent alleyways, many large historic homes, and a mix of residential types and non-residential uses blended within the historic fabric. A significant portion of this area is built on dramatic slopes with home designs emphasizing views of Commencement Bay and Puget Sound.

7. Assessment of the Application

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

- a) *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.

- b) *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 other priorities and staffing resources.

- c) *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.

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 require significantly more consultant services to support the review and height impact analysis as well as a greater commitment of staff and consultant services to a broader, community wide engagement effort.

8. Recommendation

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

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

Staff recommends that the Planning Commission accept the application to create a VSD-20 Overlay District and forward it into the technical analysis phase of the 2020 Amendment Process, with the following modification to the scope of work:

- Expand the area of applicability for this review to include the areas where preliminary LIDAR data suggests the greatest concentration of properties that have potential to benefit from a 20 foot building height restriction. In addition to the areas depicted in Exhibit A staff also recommends a preliminary analysis of the applicability to the McKinley Hill/Strawberry Hill areas of the City be conducted.
- Consider cross sections of slopes in the West End, North End, East Side, and Northeast Tacoma to consider the impact of height limitations (20' vs 25') in determining the appropriate height overly;
- Assess the general building height characteristics within these broader areas.

If the Commission agrees with the staff recommendation, staff would begin the process of soliciting consultant services to support the effort and working with the Planning Commission to refine the data needs, view analysis, and applicability criteria that could be used to inform the Commission's analysis and recommendations.

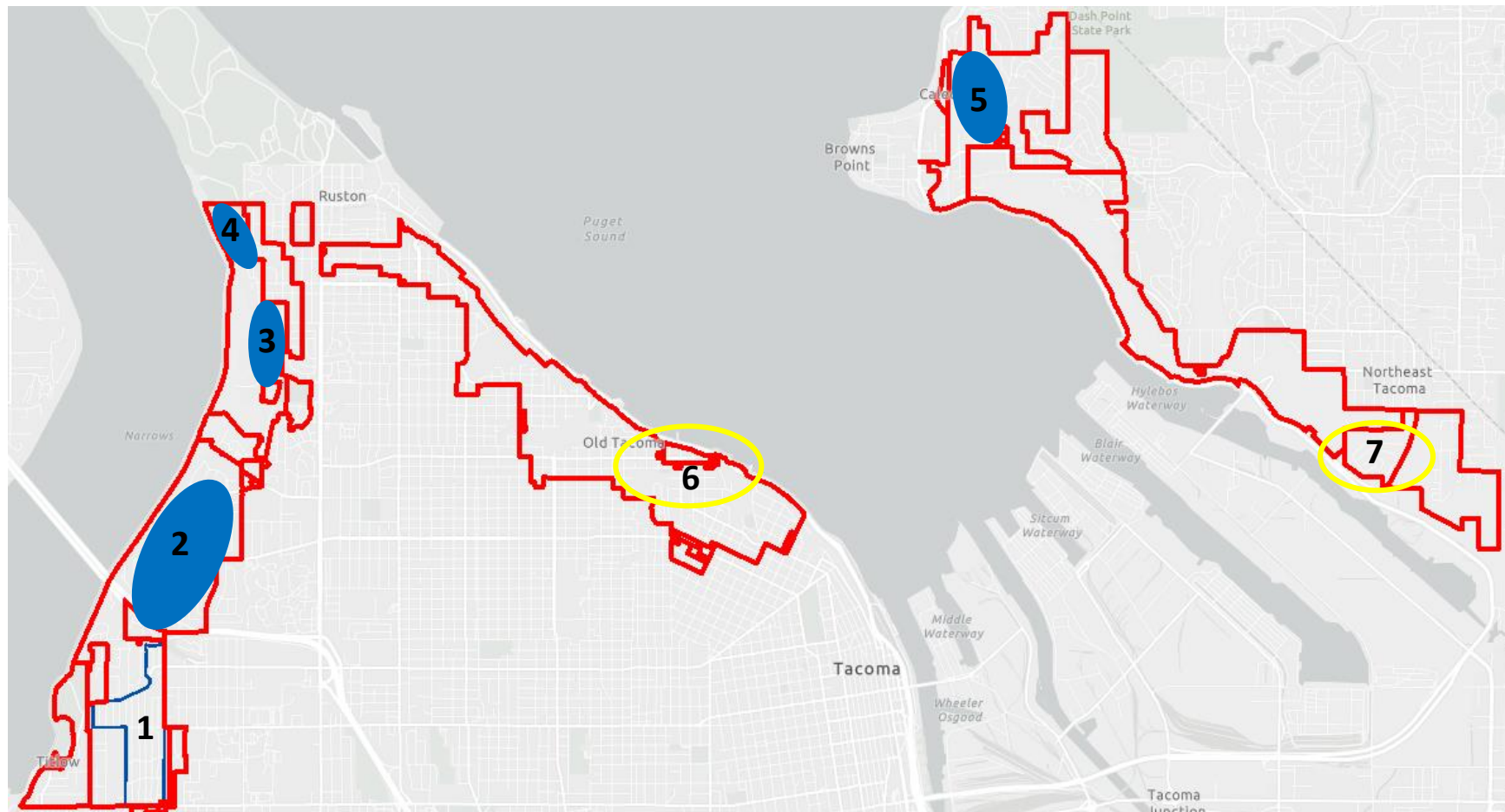
Staff does not recommend that the View Sensitive Code be extensively modified, however, there may also be opportunity for some minor modifications such as the addition of intent language and a clarification of the existing language which may have become non-applicable.

9. Exhibits:

A – Preliminary LIDAR data

B – 1988 View Sensitive Area Study (contained on USB drive, available to the general public by request)

Preliminary LIDAR Data – Potential VSD-20 Areas



Possible areas of applicability for VSD 20



View Sensitive Overlay District Boundary



1-Narrowmoor (Application)

2- Narrows Bridge Addition/Tacoma Olympic View Addition/Miller's Panorama Park

3- North Vassault Street & North 45th Street

4- North Mildred Street & North Parkside Lane Area

5- Sea View Terrace/Beverly Heights/Scenic View Heights

6- Old Town – Not recommended for inclusion based on LIDAR data

7- Pointe Woodworth – Not recommended for inclusion based on LIDAR Data

The following series of LIDAR map images provides an indication of various locations around the City of Tacoma that could potentially benefit from a proposed 20 foot building height limitation. The LIDAR data suggests that there are areas that have similar height profiles and characteristics to the Narrowmoor area.

A few notes on the LIDAR map pages:

The City of Tacoma GIS team staff has confidence in the data and indicates it is high quality when compared to LIDAR data being used elsewhere, there is an approximate margin of error at around 1 foot. The map tool does appear to offer good insight into the overall height profiles of the VSD areas of Tacoma. A key is included with the following map pages for reference, the gray tones indicate heights below 20 feet, and the generally warmer colors indicate heights above 20 feet. Point Woodworth is included primarily as a contrasting reference, the area is within the VSD overlay however given the LIDAR data it is clearly a homogenously 25 foot building height development.

Staff does acknowledge low clarity on the LIDAR slides in the packet but provides them to be used at this time as just a very general reference showing broad height profile of the given area, not to provide clarity down to the individual property level. If the application is accepted, staff will continue working to ensure that the Commission has the highest quality reference materials including access to larger and more detailed maps with more individual focus on the given areas as well as any additional materials based on the preference of the Planning Commission.

Narrowmoor



Area built out from the early 1950s to mid-1960s.

Legend

- Narrowmoor Areas
- Narrowmoor
- Tax Parcel

Height of Surface Features

- <20 ft
- 20-25 ft
- 25-50 ft
- 50-75 ft
- >75 ft

Map of North and South Mountain View Areas

Scale: 400 200 0 400 Feet

North Arrow

Map Date: 6/14/2019

Map Author: [Name]

Map Project: [Project Name]

Map Title: Map of North and South Mountain View Areas

Map Description: This map shows the North and South Mountain View areas in San Jose, California. The map displays narrowmoor areas, tax parcels, and the height of surface features. The map is color-coded by tree height: dark grey for <20 ft, yellow for 20-25 ft, orange for 25-50 ft, red for 50-75 ft, and purple for >75 ft. The map includes street names such as N 11th St, N 10th St, N 9th St, N 8th St, N 7th St, N 6th St, N 5th St, N 4th St, N 3rd St, N 2nd St, N 1st St, N Locust Ln, N Mountain View Ave, N Karl Johan Ave, N Terrace Dr, N Aurora Ave, N Park View Dr, N Oak St, N Alamo Ave, N Alamo St, N Alamo Dr, N Alamo Pl, N Alamo Ct, N Alamo Ln, N Alamo Way, N Alamo Blvd, N Alamo Pkwy, N Alamo Hwy, N Alamo Expy, N Alamo Fwy, N Alamo Int'l, N Alamo Muni, N Alamo State, N Alamo Fed, N Alamo Natl, N Alamo Trans, N Alamo Comm, N Alamo Bus, N Alamo Rail, N Alamo Air, N Alamo Sea, N Alamo Space, N Alamo Tech, N Alamo Med, N Alamo Health, N Alamo Life, N Alamo Sci, N Alamo Arts, N Alamo Sports, N Alamo Rec, N Alamo Park, N Alamo Golf, N Alamo Casino, N Alamo Hotel, N Alamo Restaurant, N Alamo Bar, N Alamo Club, N Alamo Gym, N Alamo Theater, N Alamo Concert Hall, N Alamo Arena, N Alamo Stadium, N Alamo Amphitheater, N Alamo Convention Center, N Alamo Exhibition Center, N Alamo Trade Show Center, N Alamo Conference Center, N Alamo Event Center, N Alamo Wedding Venue, N Alamo Reception Hall, N Alamo Banquet Hall, N Alamo Ballroom, N Alamo Ballroom 2, N Alamo Ballroom 3, N Alamo Ballroom 4, N Alamo Ballroom 5, N Alamo Ballroom 6, N Alamo Ballroom 7, N Alamo Ballroom 8, N Alamo Ballroom 9, N Alamo Ballroom 10, N Alamo Ballroom 11, N Alamo Ballroom 12, N Alamo Ballroom 13, N Alamo Ballroom 14, N Alamo Ballroom 15, N Alamo Ballroom 16, N Alamo Ballroom 17, N Alamo Ballroom 18, N Alamo Ballroom 19, N Alamo Ballroom 20, N Alamo Ballroom 21, N Alamo Ballroom 22, N Alamo Ballroom 23, N Alamo Ballroom 24, N Alamo Ballroom 25, N Alamo Ballroom 26, N Alamo Ballroom 27, N Alamo Ballroom 28, N Alamo Ballroom 29, N Alamo Ballroom 30, N Alamo Ballroom 31, N Alamo Ballroom 32, N Alamo Ballroom 33, N Alamo Ballroom 34, N Alamo Ballroom 35, N Alamo Ballroom 36, N Alamo Ballroom 37, N Alamo Ballroom 38, N Alamo Ballroom 39, N Alamo Ballroom 40, N Alamo Ballroom 41, N Alamo Ballroom 42, N Alamo Ballroom 43, N Alamo Ballroom 44, N Alamo Ballroom 45, N Alamo Ballroom 46, N Alamo Ballroom 47, N Alamo Ballroom 48, N Alamo Ballroom 49, N Alamo Ballroom 50, N Alamo Ballroom 51, N Alamo Ballroom 52, N Alamo Ballroom 53, N Alamo Ballroom 54, N Alamo Ballroom 55, N Alamo Ballroom 56, N Alamo Ballroom 57, N Alamo Ballroom 58, N Alamo Ballroom 59, N Alamo Ballroom 60, N Alamo Ballroom 61, N Alamo Ballroom 62, N Alamo Ballroom 63, N Alamo Ballroom 64, N Alamo Ballroom 65, N Alamo Ballroom 66, N Alamo Ballroom 67, N Alamo Ballroom 68, N Alamo Ballroom 69, N Alamo Ballroom 70, N Alamo Ballroom 71, N Alamo Ballroom 72, N Alamo Ballroom 73, N Alamo Ballroom 74, N Alamo Ballroom 75, N Alamo Ballroom 76, N Alamo Ballroom 77, N Alamo Ballroom 78, N Alamo Ballroom 79, N Alamo Ballroom 80, N Alamo Ballroom 81, N Alamo Ballroom 82, N Alamo Ballroom 83, N Alamo Ballroom 84, N Alamo Ballroom 85, N Alamo Ballroom 86, N Alamo Ballroom 87, N Alamo Ballroom 88, N Alamo Ballroom 89, N Alamo Ballroom 90, N Alamo Ballroom 91, N Alamo Ballroom 92, N Alamo Ballroom 93, N Alamo Ballroom 94, N Alamo Ballroom 95, N Alamo Ballroom 96, N Alamo Ballroom 97, N Alamo Ballroom 98, N Alamo Ballroom 99, N Alamo Ballroom 100.

Narrowmoor Height of Surface Features - South



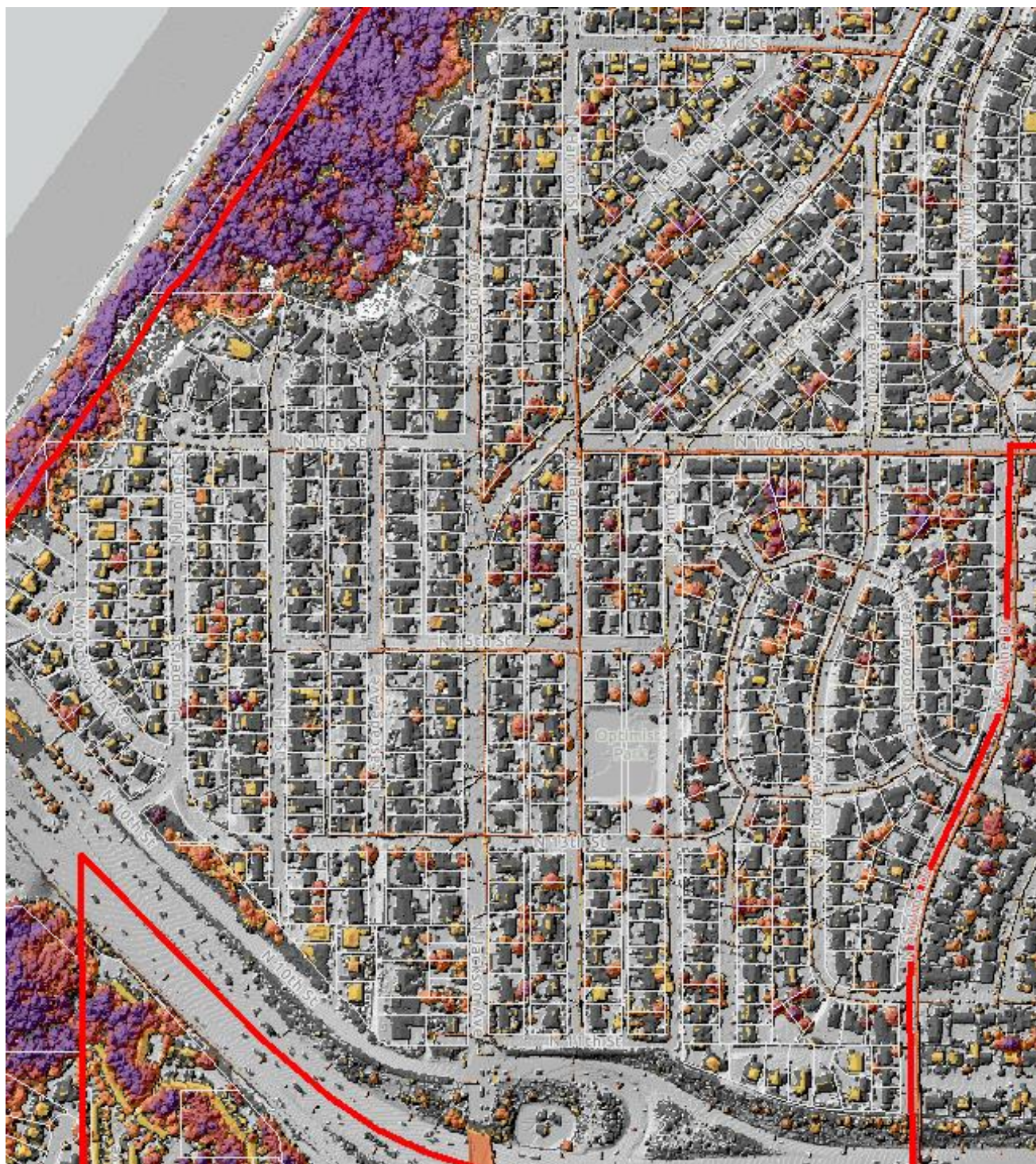
Narrowmoor and Surrounding Areas Height of Surface Features



Narrows Bridge Addition/Tacoma Olympic View Addition/ Miller's Panorama Park



Area built out in the late 1950s through Mid-1960s. Several newer homes and many very extensive addition/remodels.



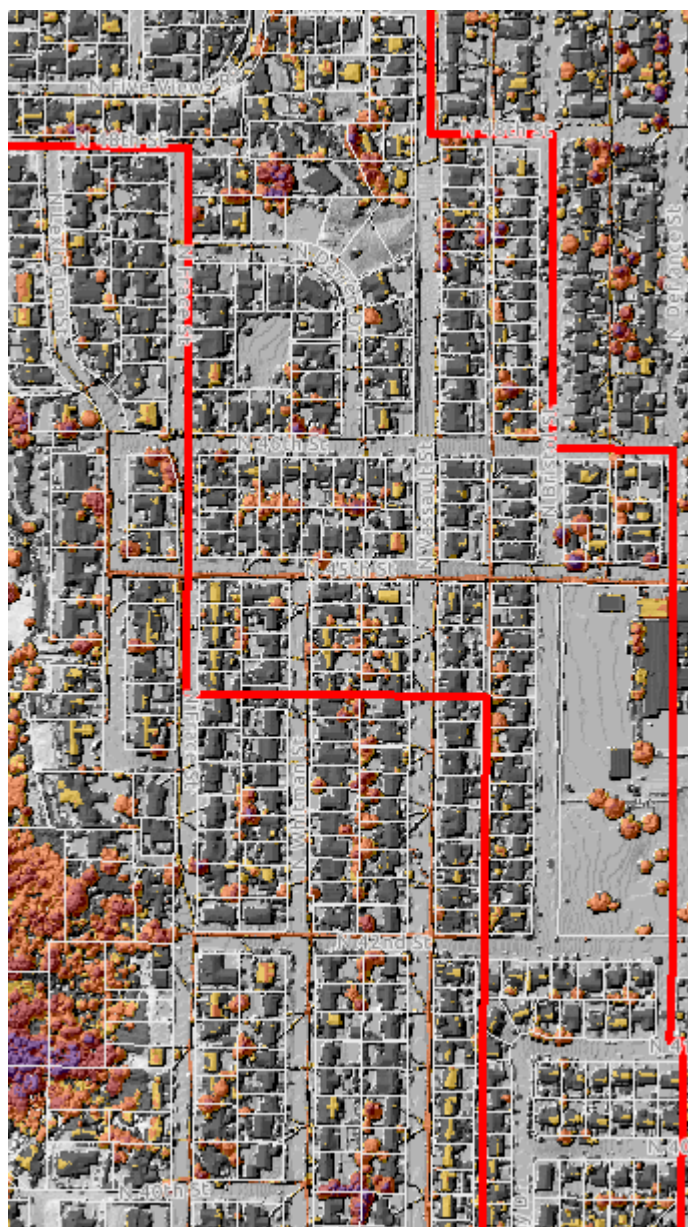
▼ ☒ Height of Surface Features

- ☐ <20 ft
- ☐ 20-25 ft
- ☐ 25-50 ft
- ☐ 50-75 ft
- ☐ >75 ft






North Vassault Street & North 45th Street Area



Area built out between the mid-1960s to the early 1980s.



▼ ☒ Height of Surface Features

-  <20 ft
-  20-25 ft
-  25-50 ft
-  50-75 ft
-  >75 ft

North Mildred Street & North Parkside Lane Area



Area built out between the late 1990s to early 2000s



Sea View Terrace/Beverly Heights/Scenic View Heights








Old Town



Old Town contains a variety of residential and commercial structures developed from the late 1800s through the early 2000s.



▼ ☒ Height of Surface Features

-  <20 ft
-  20-25 ft
-  25-50 ft
-  50-75 ft
-  >75 ft

Pointe Woodworth








Development built out in the late 1990s to early 2000s.

*Development is primarily zoned R-2-PRD-VSD



▼ ☒ Height of Surface Features

-  <20 ft
-  20-25 ft
-  25-50 ft
-  50-75 ft
-  >75 ft