Application 1

Mor Furniture
Land Use Designation Change

Application:
Mor Furniture Land Use Designation Change

Staff Analysis Report
February 1, 2023

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 "Low-Scale Residential" designation to "General Commercial", as part of the 2023 Annual Amendment to the One Tacoma Comprehensive Plan and the Land Use Regulatory Code ("2023 Amendment"). The applicant has stated intent to develop the 1.24-acre parcel to complement development of Commercial Zoned parcels that border directly to the north of the subject site. The applicant's future development plans would require the subject site be rezoned to C-2 General Community Commercial Zoning District, which is not supported by the current policy. If the amendment request is approved by the City Council, a subsequent site rezone application would be required to consider the reclassification of the site to the C-2 General Community Commercial Zoning District.

Project Summary	
Application ID:	"Mor Furniture" Land Use Designation Change and Rezone
Applicant:	Wesco Management LLC (the parent company of Mor Furniture)
Staff Contact:	Adam Nolan, Associate Planner, anolan@cityoftacoma.org
Location and Size of Area:	1824 S 49th St, Tacoma, WA 98408 (APN 2110000331) Site is approximately 1.24 acres/53,878 SF
Current Land Use and Zoning:	Land Use Designation: Low-Scale Residential Zoning District: R-2 STGPD (Single-Family Dwelling District & South Tacoma Groundwater Protection District)
Neighborhood Council Area:	South End
Project Proposal:	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 "Low-Scale Residential" designation to "General Commercial."

1. Area of Applicability

Map 1. Subject Site (Parcel A), outlined in Yellow, is located just east of I-5 off of S.49th St.

SITE LOCATION:
1.24-acre portion adjacent to existing C-2 General Commercial-zoned Mor Furniture parcels lying to the north.

Address:
1824 S 49th St
APN: 2110000331

Map 2. Subject Site (Parcel A) location in city of Tacoma.

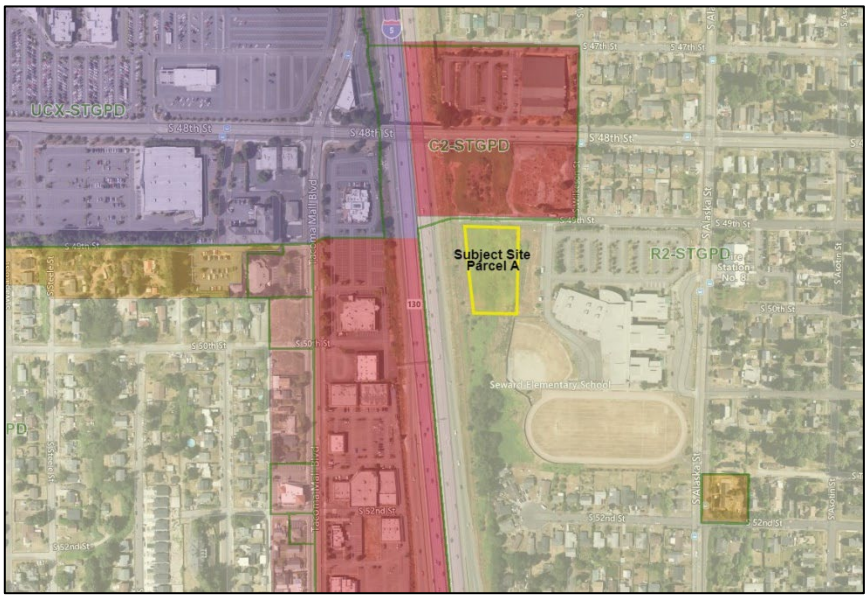
2. Background

The parcel in question (Parcel A) is located south of S 49th Street and is bordered by Interstate 5 to the west and Giaudrone Middle School properties to the east and south. Wesco Management LLC (the Applicant) purchased the currently vacant and undeveloped Parcel A from Tacoma School District #10 in 2018. The subject site is identified in the *One Tacoma Plan* as part of the City's overall park and recreation system as an educational facility (school), due to previous ownership by the school district. Currently, Parcel A has a Low-Scale Residential land use designation; is zoned R2- STGPD, Single-Family Dwelling District; and is within the South Tacoma Groundwater Protection District (TMC 13.09).

Wesco Management LLC (the Applicant) owns four additional undeveloped parcels, Parcels B, C, D and E (See Maps 3 and 4). Parcels B and E were rezoned to C2 in 1988. Parcels C and D were purchased by Wesco Management from Perinatal Treatment Services and rezoned to C2 General Commercial in 2015 (HEX 2014-11, Ord 28240; nursing home and childcare center were a few prior uses). Additionally, a portion of South 49th Street was vacated in 2015 spanning west of S Wilkerson to border of Interstate 5 (HEX 2014-12, Ord 28239). The subject parcel (Parcel A) is currently incorporated in the grading plan for the adjoining C2 Commercial zoned lots to the north (Parcels B-E) (approved site development plan SDEV17-0146).

The applicant submitted materials with their application stating their intentions to develop a Mor Furniture store on the site of Parcels B, C, D, and E, and vacated portion of South 49th Street. Included in these preliminary plans is development of Parcel A into a Mor Furniture Outlet store that can provide additional parking and services for the Mor Furniture store that the applicant intends to develop on Parcels B-E.

Map 3. Subject Site (Parcel A) outlined in yellow. Applicant-owned Parcels B-E outlined in white.



Map 4. Subject site (Parcel A) currently has Low-Scale Residential land use designation and is zoned R2-STGPD. Subject Site abuts Mor Furniture parcels to the north that are General Commercial land use designation and zoned C2-STGPD.

With these plans stated, the applicant is requesting a land use designation change for Parcel A from Low-Scale Residential to General Commercial. If the amendment request is approved by the City Council, a subsequent site rezone application would be required to consider the reclassification of the site from R-2 Single-Family Dwelling District to C-2 General Community Commercial Zoning District. Zoning decisions must be consistent with the Comprehensive Plan, which identifies a specific relationship between the land use designations in the Plan and the implementing zoning district. The table below summarizes this relationship and the type of character and impact expected in Low Scale Residential and General Commercial areas.

Comprehensive Plan Land Use Designation	***Potential Uses and Impacts***	***Potential Zoning Districts***
Low Scale Residential	• Range of housing choices • Generally quieter settings of complete neighborhoods • Short to moderate walking distance from parks, schools, shopping, transit, and other neighborhood amenities • Limited vehicular traffic • Target Development Density: 10-25 dwelling units/net acre	• R-1 Low-Scale Residential District • R-2 Low-Scale Residential District • R-2SRD Low-Scale Residential Special Review District • HMR-SRD Historic Mixed Residential Special Review District
General Commercial	• Medium to high intensity commercial uses serving a large community base with a broad range of larger scale uses • Allow for a wide variety of residential development, community facilities, institutional uses, and some limited production and storage uses • Generally located along major transportation corridors, often with reasonably direct access to a highway • Characterized by larger-scale buildings, longer operating hours, and moderate to high traffic generation • Target Development Density: 45–75 dwelling units/net acre	• PDB Planned Development Business District • C-2 General Community Commercial District

Table 1. Land use designations, Low-scale Residential and General Commercial, per the One Tacoma Comprehensive Plan, Urban Form Element

3. Analysis

Staff analysis of this application has been conducted in accordance with TMC 13.02.070.F.2, which requires the following four provisions be addressed, as appropriate:

- A staff analysis of the application in accordance with the elements described in 13.02.070.D;
- An analysis of the consistency of the proposed amendment with State, regional and local planning mandates and guidelines;
- An assessment of the anticipated impacts of the proposal, including, but not limited to: economic impacts, noise, odor, shading, light and glare impacts, aesthetic impacts, historic impacts, visual impacts, and impacts to environmental health, equity and quality.

a. A staff analysis of the application in accordance with the elements described in 13.02.070.D;

TMC 13.02.070.D, subsection 5.d.(1), requires that the following objectives shall be met by applications for the annual amendment:

- <u>Address inconsistencies or errors in the Comprehensive Plan or development regulations;</u>

  Staff Response: The application would not address any errors or inconsistencies in the Comprehensive Plan or development regulations.

- <u>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;</u>

  Staff Response: The application responds to changing circumstances of ownership of the subject parcel, which was surplused by the Tacoma School District. The applicant, Wesco Management LLC (Mor Furniture), purchased the parcel from Tacoma Public Schools in 2018. While the applicant proposed a specific change to "General Commercial" land use and C2-STGPD rezone, staff concurs that given the change in ownership from the School District to a private owner, this is an appropriate time to consider the future land use of the site.

- <u>Maintain or enhance compatibility with existing or planned land uses and the surrounding development pattern; and/or</u>

  Staff Response: The Compatibility Analysis (Attachment A) and Map 5 detail the land use and development pattern surrounding the currently vacant/undeveloped subject site; the area includes commercial, institutional, and residential uses. The subject parcel (Parcel A) (Low-Scale Residential; R-2 STGPD) is bordered/constrained on the west by Interstate 5; the Tacoma Public Schools/Giaudrone Middle School institutional uses (Low Scale Residential; R2 STGPD) to the east and south; and the applicant-owned commercial parcels (General Commercial; C2 STGPD) neighboring to the north. The nearest single-family dwellings (Low Scale Residential; R2-STGPD) lie approximately 250 feet northeast (S 49th St and S Wilkeson St) of Parcel A; additional single-family dwellings lie approximately 600 ft to the south of Parcel A and are separated by four school-owned parcels. A few other important considerations include:

  - <u>Accessibility:</u> In the current state, Parcel A is not accessible without passing through the applicant's commercial parcels to the north (Parcels B-E). As noted in the "Background" section of this report, the portion of S 49th Street that could provide access to Parcel A was vacated in 2015 and incorporated into the applicant-owned Parcels B, C, and D. Through informational outreach efforts, staff has received multiple comments regarding safety concerns about vehicle access

through S 49th St., especially with the proximity to Giaudrone Middle School (student safety). The applicant has indicated in their amendment application that accessibility to Parcel A would be from S 48th Street and through the applicant-owned Commercial parcels to the north; S 49th Street would be restricted to emergency vehicle access only.

- Residential Uses: Parcel A is located directly along Interstate 5, raising questions and concerns about the potential viability and likelihood of Low Scale Residential land uses being developed at Parcel A in the future, especially regarding air quality concerns. Staff notes that similar concerns arose from the Tacoma Mall Subarea Plan process (concerning Tacoma Mall Regional Growth Center lying across Interstate 5 northwest of Parcel A) with Goal LU-1 of the adopted plan, in part, stating "Limit residential development in close proximity to Interstate-5 due to air quality concerns" (pp. LU8-LU9); this was codified in TMC 13.06.040.J.6 Tacoma Mall Neighborhood Regional Growth Center, Residential Uses Prohibited. Along with this precedent, staff must also consider potential compatibility issues of Low Scale Residential land uses being surrounded by Commercial and Institutional uses.

Map 5. Subject site (Parcel A) has Low-Scale Residential land use designation and is zoned R2-STGPD. The subject site directly borders Giaudrone Middle School parcels to the East and South, and Mor Furniture properties (Commercial, C2) to the north. The area has additional commercial business in vicinity, along with single family dwellings (Low-scale, R2) that abut some commercial properties.

The surrounding development pattern, and the location and characteristics of Parcel A, indicates that a land use designation change from Low Scale Residential to General Commercial would not be incompatible. The applicant has provided preliminary development plans indicating possible uses for Parcel A and Parcels B-E, but staff must consider the possibilities of different uses that could be developed under General Commercial and their potential impacts.

Staff also notes that this is the first of several steps that the applicant will need to obtain approval for before proceeding to project-level development, and the process in each step provides oversight concerning compatibilities with surrounding uses and development patterns. If the land use designation change to General Commercial was approved, the applicant would need to provide more detailed and concrete plans and impact analyses in seeking a rezone to C2-STGPD to ensure compatibility with neighboring uses and development patterns. If the rezone were approved, then the applicant would have

to meet all applicable development code standards and potential impact mitigations in the project-level permitting stages.

- Enhance the quality of the neighborhood.

  Staff Response: Staff has no finding on this element, rather staff will note that the key will be conditions imposed on the site-specific rezoning and the applicant's plan to address possible SEPA findings and proposal to meet and/or exceed the City's development standards and requirements at the time of specific development proposal. There are further steps that would need to be taken, and this element cannot be adequately assessed at this time.

b. An analysis of the consistency of the proposed amendment with State, regional and local planning mandates and guidelines;

Staff Response: As part of the initial staff assessment report, staff identified specific policies pertinent to the application. Based on those policies, staff does not identify any inconsistencies with State or regional planning mandates and guidelines. Staff notes that the proposal is generally compatible with elements of the *One Tacoma Comprehensive Plan*, including Economic Development, Urban Form, and Design and Development Elements. Staff doesn't identify any major policy conflicts with this request and these considerations are further evaluated in staff analysis concerning compatibilities (Attachment A) with land uses and the surrounding development pattern, and in the assessment of anticipated impacts (Attachment B).

c. An assessment of the anticipated impacts of the proposal, including, but not limited to: economic impacts, noise, odor, shading, light and glare impacts, aesthetic impacts, historic impacts, visual impacts, and impacts to environmental health, equity and quality.

Staff Response: Staff has conducted an impacts analysis (Attachment B) and outreach to better understand the potential impacts of this proposal. Staff also conducts a non-project action SEPA checklist as part of the annual amendment cycle to consider the potential environmental impacts of the proposals.

The City Council has adopted a policy to consider equity in all Council actions. As a result, potential impacts need to be assessed through an equity lens utilizing the Tacoma Equity Index and other tools, including the historical context of planning in the area. For instance, a 1929 map used by the Home Owners' Loan Corporation (HOLC) rated the area of subject site (C-20) a "C- Definitely Declining" rating, and residential area (D-7) in close proximity to the subject site a "D-Hazardous" rating (Redlining). It also appears that the area may have been significantly impacted by the building of Interstate 5 and possibly other urban renewal projects. In the current context, data from the Tacoma Equity Index indicates that the area (within 2500 feet of the subject site) falls into "Very Low", "Low", and "Moderate" equity thresholds across several of the primary indicators (Livability, Accessibility, Economy, Education, Environmental Health).

Staff notes that, while the applicant did submit preliminary plans for intended development of the subject site, it will be important for the Planning Commission and City Council to consider the potential impacts of the range of uses that could be allowed under General Commercial land use designation. With a change in land use designation and subsequent rezone to Commercial, there will be the potential for a variety of different types of commercial activity now and into the future. The level of analysis conducted related to this specific application and proposed land use can in no way cover all the potential impacts that could arise from the different types of commercial activity that may take place at this site in the future. If the Comprehensive Plan land use designation request is approved, future site rezones and permits would also be subject to compliance with City development standards and SEPA review, and will include public notifications and opportunities to provide comment.

Baseline Assumptions

As a baseline for this analysis, we assume that the subject site (Parcel A) would otherwise be developed under the existing zoning for low scale residential development. The baseline assumes, therefore, that the site would likely generate additional vehicle trips and result in an increase in impervious surface resulting from development under the baseline land use designation. Furthermore, the baseline assumes commercial development on parcels B, C, D and E under the existing C-2 General Commercial zoning. This impacts analysis is focused on the additional impact that may result from the proposed land use designation change for the subject site only. Lastly, while the request is in support of a specific project, we must assume that the future land use will allow for general commercial uses and not exclusively the proposed project.

Overall Assessment

The Impacts Analysis Table (Attachment B) assesses the anticipated impacts of the proposal. This analysis details the City's Applicable Plans and Development Standards, Baseline Conditions for the subject site, and Staff Analysis as they relate to impact criteria (Land Use and Housing, Transportation, etc.). Overall, the staff analysis finds that the impacts of the proposed amendment would likely be addressed adequately through the application of City standards that the applicant would be subject to at the site rezone and permitting stages. Below are a few summary items highlighting some of the key concerns heard through community outreach with further details found in the Impacts Analysis Table.

- **Traffic**

Transportation impacts have been identified as significant concerns in informational meetings conducted so far, especially concerning student safety with the subject site in close proximity to Giaudrone Middle School. Preliminary development plans provided by the applicant indicate that the only public and operational access to the subject site would be from S 48th St and through the applicant's Commercial parcels (Parcels B-E) to the north. Access to subject site through S 48th St would be a likely requirement for proposed projects. Improvements to ensure proper visibility and access along S 48th St for pedestrians, bicyclists, and motorized traffic would also likely be a requirement.

Staff notes that any development of Parcel A will increase traffic in the area to some extent. This requires consideration of potential traffic impacts if Parcel A remains a Low Scale Residential land use as well as if the land use is changed to General Commercial. The location and accessibility challenges of the subject site could potentially indicate that Low Scale Residential land uses could be very car dependent with high trip generation and limited walkability to services and amenities.

The applicant contracted with Jake Traffic Engineering (JTE) to complete a trip generation analysis (Attachment C) that has been reviewed by Public Works-Transportation and Planning staff. The trip generation study analyzed the proposed and additional General Commercial uses alongside single family detached and multifamily housing use scenarios that could be developed under existing Low Scale Residential land use designation. The JTE study found:

- The proposed Mor Furniture Outlet project (General Commercial) is projected to generate fewer trips than development that could occur under current Low Scale Residential/R2-STGPD zoning at subject site.

- The potential addition of five PM peak hour trips to the street grid via the existing Mor Furniture Commercial zoned parcels driveway (Parcels B-E) on 48th would not materially affect traffic operations.
- No apparent issues with traffic safety at intersections and streets near subject site; Conclusions drawn from reviewing incidents tracked in WSDOT accident data portal from 2017 to 2021.
- No apparent conflicts/issues with existing pedestrian, bicycling, and transit infrastructure or level of service.

Staff notes that these are the conclusions reached by JTE through their analysis. No distinction is made between personal-owned vehicles and truck traffic in the trip generation analysis. However, if the proposed land use designation change to General Commercial were to be approved, the applicant would likely be subject to additional traffic study including for truck traffic, turning templates, and other additional analysis at the rezone and permitting stages, and be subject to conditions to help mitigate any impacts that may be identified through SEPA Checklist and City standards.

- **Air Quality**

Staff acknowledges that with the subject site lying directly along Interstate 5, air quality at the subject site is a problem and area of significant concern. Traffic from Interstate 5 is the primary driver of adverse air quality. The subject parcel was sold by Tacoma Public Schools to Wesco Management LLC in 2018. Giaudrone Middle School and parcels border directly east and south of the subject site, so are in close proximity to Interstate 5. In consulting with community members and Tacoma Pierce County Health Department (TPCHD), staff has been made more aware of concerns for student and resident health related to air quality conditions. TPCHD noted that Giaudrone Middle School attendance encircles low- and very low-opportunity neighborhoods and that exposure to PM2.5 from diesel exhaust (proximity to heavily trafficked roadways) can contribute to adverse learning and development outcomes, and increased risk of health hazards and disease. This is also an area lacking in tree canopy that could help mitigate some of the impacts related to air quality.

Air quality impacts on new residential development along Interstate 5 also must be considered. The subject parcel currently has a Low Scale Residential land use designation meaning that residential uses could be developed on this site. With the adoption of the Tacoma Mall Neighborhood Subarea Plan in 2018, the City has established precedent in prohibiting residential uses along Interstate 5 due to air quality concerns, as noted in Goal LU-1 of the subarea plan and codified in TMC 13.06.040.J.6 (See Air Quality Section of Attachment B). Staff also notes that, due to the limitations of accessing the site, any new development of the subject site (residential or commercial) is expected to be highly auto dependent, and this will likely have increased adverse impacts on air quality in the area.

The city does not establish or enforce regulatory standards and monitoring for air quality. Rather, air quality impacts are considered as part of the City's Environmental Review (SEPA), typically at a project level. Regulatory standards and monitoring are administered at varying degrees from the federal Environmental Protection Agency (EPA), the Washington State Department of Ecology (WA DOE), and the Puget Sound Clean Air Agency (PSCAA). The Clean Air Act requires the EPA to set air quality standards for six common air pollutants. The WA DOE regulates and monitors air toxics pollution throughout the state including implementing programs (Zero Emission Vehicle standards, Clean Car Law, etc.) to address vehicle emissions to reduce pollution and greenhouse gases (GHG), and partners with local clean air agencies to identify and

monitor pollutants that present greatest risk to health. The PSCAA monitors Pierce County (along with King, Kitsap, and Snohomish counties) air pollution and focuses monitoring on fine particle pollution because of its health impacts.

The City has taken several actions in response to climate change, including focus on reducing GHGs. The City Council declared a climate emergency in 2019 (Resolution No. 40509) and in 2021 committed to reducing the City's municipal carbon footprint (Resolution No. 40776). The 2030 Climate Action Plan also details actions to address GHGs. The Office of Environmental Policy & Sustainability and the Sustainable Tacoma Commission monitor GHG reductions and sustainability efforts made by the City of Tacoma and the community. The Urban Forestry Program also has set goals to increase tree canopy cover in the city including providing tree giveaway and other programs to residents and businesses.

The City also has policy that could help address air quality concerns through its overall growth strategy. The Transportation Master Plan (TMP) identifies goals, strategies, and actions to support multimodal infrastructure including for pedestrian, bicycling, and transit priority networks. The TMP also supports the development of "20-minute neighborhoods" where goods and services can be obtained within short distances by using active transportation modes and reducing reliance on automobile trips that generate GHG emissions. There are also programs available through the City (TPU technical and financial assistance programs) and Pierce County (C-PACER program) that incentivize more environmentally sustainable development.

Future development may also be subject to new standards adopted by the Washington State legislature. This includes Dept. of Ecology adoption of California motor vehicle emission standards (RCW 70A.30.010), including the zero-emission vehicle program, and adoption of rules requiring electric vehicle charging stations for new building that provides on-site parking (RCW 19.27.540). The Washington State Building Code Council also adopted code applying to commercial buildings requiring all-electric (heat pump) space heating and hot water systems.

- **Critical areas**

The subject site is in an identified critical area (aquifer recharge area, South Tacoma Groundwater Protection District). There are no other known critical areas or archaeological, cultural, or historic resources on the subject site based on known mapping. Additional site verifications will be required through any future subsequent permitting, including no net loss of critical areas.

- **Tree Canopy**

Trees and greenspace have been identified as significant concerns in informational meetings conducted so far. The Impacts Analysis Table includes evaluation of City development code and standards to evaluate threshold requirements for landscaping, tree canopy, and street trees. Additional site-specific review is conducted as part of permitting. The City's site development standards would apply and would likely be an overall net improvement to tree canopy and landscaping on the subject site.

- **Potential Economic Impact**

The request for land use change to General Commercial is generally supportive of economic development policies of the *One Tacoma Comprehensive Plan*. The subject site is currently vacant/undeveloped and commercial development of this subject site would provide access to jobs for local residents, as well as provide a greater degree of products and options for consumers within the city and region.

The applicant has provided documentation (Attachment D) that they believe provides a grounding in city policy to support their amendment application. They also note that Mor Furniture provides in-house employee training/education that encourages skill development promoting high-quality, living wage jobs.

4. Public Outreach

Staff conducted a virtual community informational meeting on October 20, 2022. Notice was mailed out approximately three weeks prior to the meeting to 2088 verified addresses that included occupants and property owners within a 2,500-foot radius from the site. The meeting attendance was low despite additional public outreach efforts (8 attendees).

Staff has also conducted informational meetings with the following: the South End Neighborhood Council, Giaudrone Middle School, Tacoma Public Schools Planning/Construction Dept., Safe Streets neighborhood groups, Tacoma Public Library – Moore and South Tacoma Branches, and the Tacoma Pierce County Health Department. Comments received include concerns about traffic, access to the site, air quality, trees and greenspace, landscaping and buffering, noise, South Tacoma Groundwater Protection District, effects on property values, and safety of Giaudrone Middle School students.

The Commission is scheduled to conduct a public hearing on the 2023 Amendment in early 2023. Additional public outreach for all the applications for the 2023 Amendment will be conducted prior to and during the public hearing process.

5. Recommendation

Staff recommends that the Planning Commission release this staff report and Exhibits “A” and “B” for public review and comment.

After the public hearing, staff will facilitate the Commission’s review of public comments, decision making, and formulation of recommendations to the City Council, pursuant to TMC 13.02.070.H, as cited below:

H. Findings and recommendations.

1. Upon completion of the public comment period and review of the public testimony, the Planning Commission will make a determination as to whether the proposed amendments are consistent with the following criteria:

    a. Whether the proposed amendment will benefit the City as a whole, will not adversely affect the City’s public facilities and services, and bears a reasonable relationship to the public health, safety, and welfare; and

    b. Whether the proposed amendment conforms to applicable provisions of State statutes, case law, regional policies, and the Comprehensive Plan.

2. The Commission will prepare a recommendation and supportive findings to forward to the City Council for consideration.

6. Exhibit

- Exhibit "A" – Mor Furniture Land Use Designation Change Amendment, Future Land Use Map
- Exhibit "B" – Mor Furniture, Amendment to Parks and Recreation Facilities Map

7. Supplemental Information

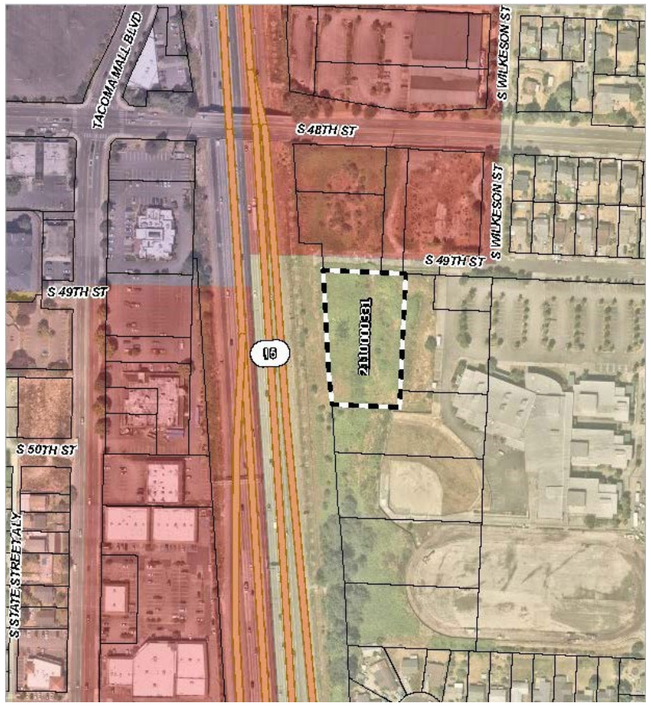
- Attachment A: Compatibility Analysis
- Attachment B: Impact Analysis
- Attachment C: Trip Generation Analysis
- Attachment D: Economic Goals Review

# # #

2023 Comprehensive Plan and Land Use Code Amendments
Future Land Use Implementation (FLUM)

EXHIBIT A: Mor Furniture Land Use Designation Change

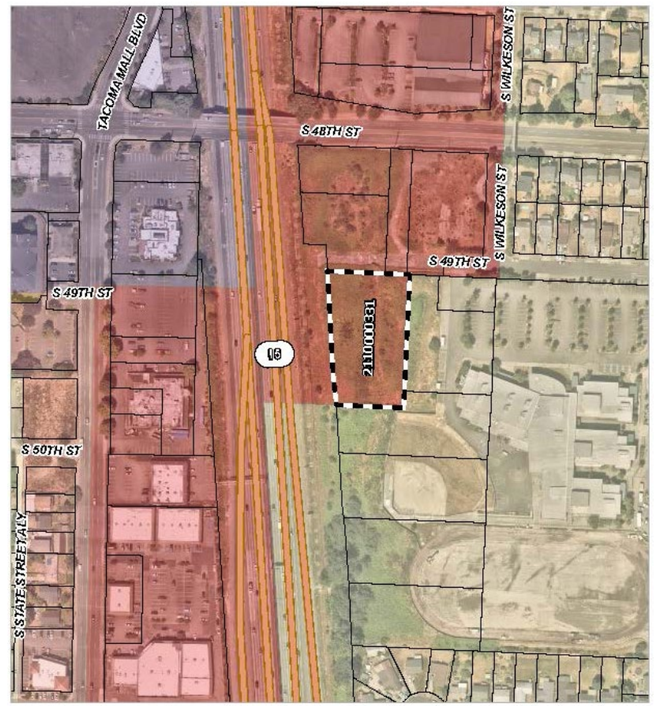
CURRENT LAND USE DESIGNATION: LOW SCALE RESIDENTIAL



Low-Scale Residential Designation Description:

Low-scale residential designations provide a range of housing choices built at the general scale and height of detached houses and up to three stories (above grade) in height… Low-scale residential designations are generally located in quieter settings of complete neighborhoods that are a short to moderate walking distance from parks, schools, shopping, transit and other neighborhood amenities… Qualities associated with low-scale residential areas include: Diverse housing types and prices, lower noise levels, limited vehicular traffic, moderate setbacks, private and shared open space and yards, street trees, green features, and complete streets with alleys.

PROPOSED LAND USE DESIGNATION: GENERAL COMMERCIAL



General Commercial Designation Description:

This designation encompasses areas for medium to high intensity commercial uses which serves a large community base with a broad range of larger scale uses. These areas also allow for a wide variety of residential development, community facilities, institutional uses, and some limited production and storage uses. These areas are generally located along major transportation corridors, often with reasonably direct access to a highway. This designation is characterized by larger-scale buildings, longer operating hours, and moderate to high traffic generation.

APPLICANT:
Wesco Management LLC. (parent company of Mor Furniture)

SITE LOCATION:
1824 South 49th Street, Tacoma WA

AMENDMENT TYPE:
Comprehensive Plan Future Land Use Map Amendment

WHY IS THIS CHANGE PROPOSED?
The applicant, Wesco Management LLC., submitted an amendment application seeking a land use designation change at the subject parcel located at 1824 South 49th Street. The 1.24-acre subject parcel currently has a Low-scale Residential land use designation. The applicant is requesting a land use designation change for the subject parcel to General Commercial. The applicant submitted preliminary development plans with their amendment application and stated intentions to develop the subject parcel to be a Mor Furniture Outlet store that will accompany a Mor Furniture store they are planning to develop on commercial-zoned parcels that border directly to the north of the subject parcel.

If this amendment application is approved by the City Council, the subject parcel land use designation would be amended in the Comprehensive Plan Future Land Use Map (FLUM) from Low-scale Residential designation to a General Commercial designation. If granted, the land use designation change to General Commercial would enable the applicant to apply for a rezone to PDB Planned Development Business District or C-2 General Community Commercial District.

2023 Comprehensive Plan and Land Use Code Amendments
Amendment to Parks + Recreation Map

EXHIBIT B: Mor Furniture Land Use Designation Change

CURRENT: "SCHOOL" DESIGNATION ON PARKS + RECREATION FACILITIES MAP

PROPOSED: REMOVE "SCHOOL" DESIGNATION ON PARKS + RECREATION FACILITIES MAP

PROPOSED DESIGNATION CHANGE ON PARKS + RECREATION FACILITIES MAP

SUBJECT SITE: 1824 South 49th Street, Tacoma, WA

ACTION REQUESTED: Remove subject site from "Schools" designation on Parks + Recreation Facilities Map (Figure 36) in Element 8: Parks + Recreation of the *One Tacoma Comprehensive Plan*.

WHY IS THIS CHANGE PROPOSED?
The 1.24-acre subject parcel located at 1824 South 49th Street was formerly a surplus parcel owned by Tacoma Public Schools. Public schools within the City of Tacoma are designated as parks and recreation facilities in the Parks and Recreation Element of the *One Tacoma Comprehensive Plan*. The subject parcel assumed private ownership in 2018 when Tacoma Public Schools sold the parcel to Wesco Management LLC.

Due to the change from public to private ownership, and Wesco Management's amendment request to change the subject parcel's land use designation from Low-scale Residential to General Commercial, it is requested that the subject parcel be removed from the "School" facilities designation from the Parks + Recreation Facilities Map.

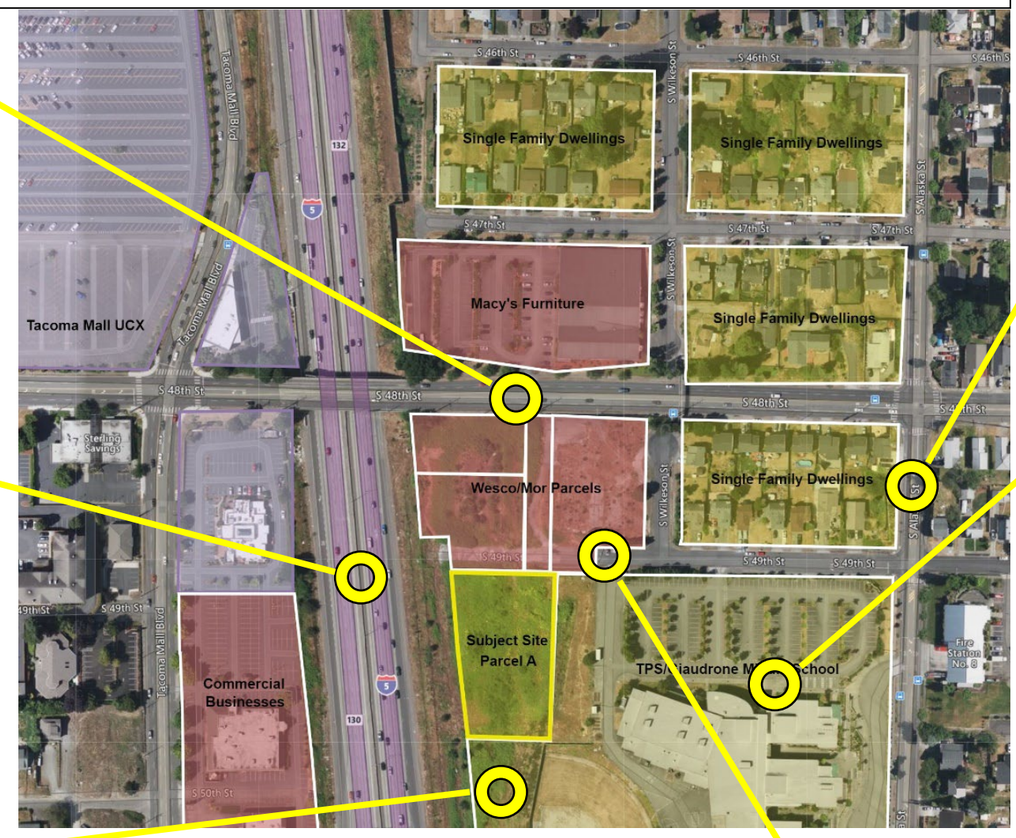
Tacoma Municipal Code 13.02.070.D requires an analysis of the application against the following objectives:

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/or
d) Enhance the quality of the neighborhood.

This draft analysis is responding to Objective C above: "Land Use Compatibility."

North Transition

The parcels to the north are currently designated and zoned for general commercial use. A Mor furniture store could be located on parcels, B, C, D, and E under current zoning and a Macy's furniture store is located to the north across S. 48th Street.



East Transition

While the middle school is designated as Low-scale Residential, it provides a use and intensity transition between the subject property to the west and the residential areas to the east. This use transition would minimize the sense of impact that could occur if a general commercial use were developed immediately abutting an established residential use pattern.

West Transition

To the west, the subject property abuts I-5, but uses to the west of I-5, both in the Tacoma Mall Regional Growth Center and along Tacoma Mall Boulevard are compatible with the proposed general commercial designation.

School Compatibility

The primary potential conflict with the school relates to impacts on walkability and safe routes to school. See the comments on access below. There are existing undeveloped areas between the subject site and school access and site improvements would require transition areas, landscaping, and other mitigation measures to avoid impacts on the school property.

South Transition

The parcels to the south are owned by the school district. The nearest residential property is 600" to the south and separated by four school owned parcels.

Access Compatibility

Access to the subject parcel is limited. Based on the current lot configuration and access, the proposed use, consolidated as part of a development site with parcels B, C, D and E provides the opportunity to access the site directly off S. 48th Street, minimizing impacts to the school and pedestrians. It is likely that residential development under the current zoning would be more likely to seek access off S 49th Street, creating more traffic and potential conflict at that location. Additional information will be provided in the Traffic Impact Analysis.

Attachment B: Impacts Analysis - Mor Furniture Land Use Designation Request

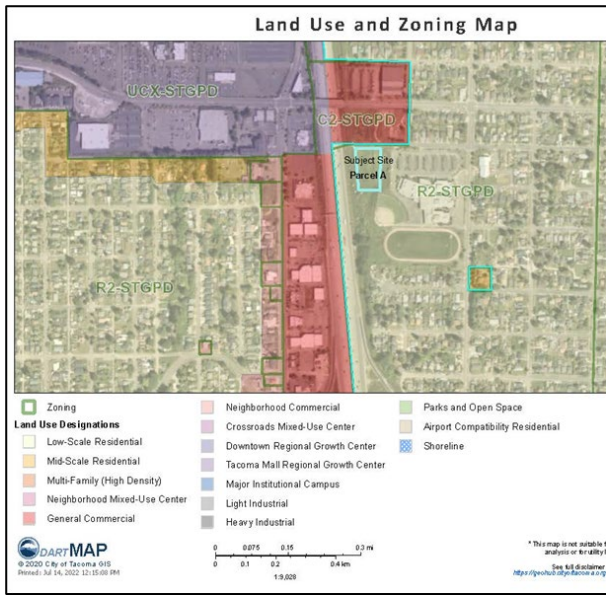
Analysis Requirements

Tacoma Municipal Code 13.02.070.F requires the following analysis of proposed amendments, including as appropriate:

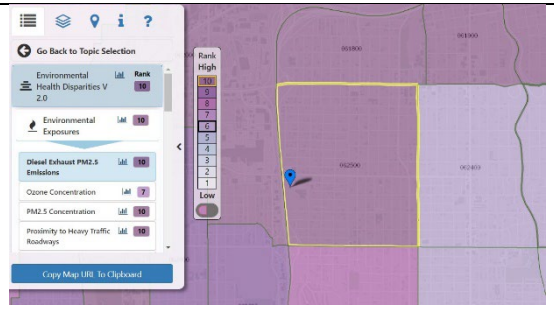
a) A staff analysis of the application in accordance with the elements described in 13.02.070.D;
b) An analysis of the consistency of the proposed amendment with State, regional and local planning mandates and guidelines;
c) An analysis of the amendment options identified in the assessment report;
d) An assessment of the anticipated impacts of the proposal, including, but not limited to: economic impacts, noise, odor, shading, light and glare impacts, aesthetic impacts, historic impacts, visual impacts, and impacts to environmental health, equity and quality

Additional Analysis

Along with information provided in the staff analysis report, staff conducted an Impact Analysis to better understand current conditions and potential impacts related to Wesco Management/Mor Furniture's application for land use designation change to General Commercial at the subject site (1824 South 49th St.). The Impact Analysis attempts to respond to some of the categories that would be addressed in a SEPA checklist. The analysis is intended to identify potential impacts related to the amendment request and the applicable city plans and development standards that could address potential impacts, especially if this amendment application were to be approved and move into the rezone and permitting stages. Application for rezone and development permits at the subject site would be subject to additional analysis and potential conditions to mitigate any identified impacts to the surrounding area.

Impact Analysis – Mor Furniture Amendment Application		
Applicable Plans and Development Standards	**Baseline Conditions**	**Staff Analysis**
Land Use and Housing		
TMC Title 13 Land Use Regulatory Code TMC 2.19 Site Development Code  	The subject site is vacant and undeveloped with current land use of "Low-Scale Residential" and Zoning R2-STGPD. No existing dwellings or structures would be demolished as part of future development of this site. The subject property is approximately 1.24 acres. Based on the size, the site could accommodate, under existing zoning, approximately 10-11 housing units based on a standard 5,000 sq. ft. lot, though this does not take into account other roadway and site improvements needed to accommodate housing development. The area is in proximity to Giaudrone Middle School and single-family residential dwellings that are Low-Scale Residential and R2-STGPD; and General Commercial land uses zoned C2-STGPD.	Development of the subject site will have impacts on adjacent land uses, but the extent of impacts and need for mitigation measures will be more fully analyzed at the rezone and permit application stages. The subject parcel, being located within an identified Critical Area of the South Tacoma Groundwater Protection District Overlay District, may be subject to additional development and use standards, restrictions, and reporting requirements as established in TMC Title 13.06.070.D South Tacoma Groundwater Protection District and TMC 13.11 Critical Areas Preservation.

Parking		
TMC 13.06.090.C Off-street parking areas TMC 13.06.090.D Loading Spaces	Currently the site is vacant and no parking is provided on site.	TMC 13.06.090.C Off-street parking areas details the Off-Street Parking Space Requirements (quantity standards) per applicable zoning district. Further evaluation at project level and permitting will be required to be in accordance with development standards. Typical minimum parking requirements for retail/shopping center/office developments range from 2.5 – 4 parking spaces per 1,000 square feet of building floor area and warehousing uses are required to provide 1 off street parking space per 2,000 square feet of floor area.
Air Quality		
The City of Tacoma does not have development standards related to air quality. The staff report does note some City plans and policy that are intended to help address air quality concerns. Regulatory Hierarchy for air quality policy, regulations, and monitoring: United States Environmental Protection Agency Washington State Dept. Of Ecology Puget Sound Clean Air Agency	The air quality at the subject site is a problem and of concern for the area. The subject site borders Interstate 5 and automobile traffic from the freeway is a primary driver of adverse air quality. According to the Washington State Dept. Of Health Environmental Health Disparities Map shown below, the subject site lies within an area that is in the highest rank (10) for "Diesel Exhaust PM2.5 Emissions" and "PM2.5 Concentration."	Staff notes that there is established precedent concerning considerations of residential development along Interstate 5 and air quality concerns. This precedent pertains to the Tacoma Mall Neighborhood Regional Growth Center (RGC), and while the subject parcel is not within the Tacoma Mall Neighborhood RGC, it is located across Interstate 5 to the southeast. Goal LU-1 (Mixed-use development) of the Tacoma Mall Neighborhood Subarea Plan



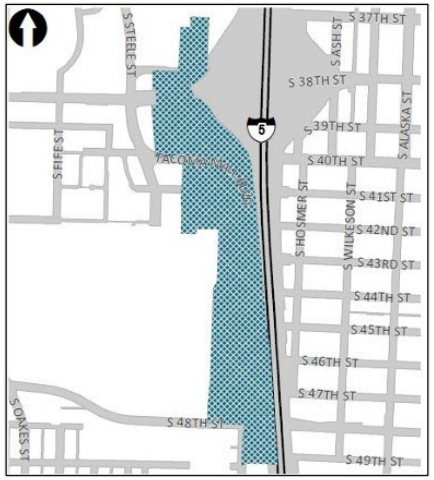
Giaudrone Middle School borders the subject site to the east. The Giaudrone MS attendance boundary encircles low- and very low-opportunity neighborhoods, as identified on the City's Equity Map. Student and resident health are important concerns, especially in considering adverse health effects from PM2.5 emissions.

Tree canopy is also lacking in the area. The Urban Tree Canopy Assessment (2018) identified 12% urban tree canopy for the U.S. Census block group that the subject site is located within (pp. 19).

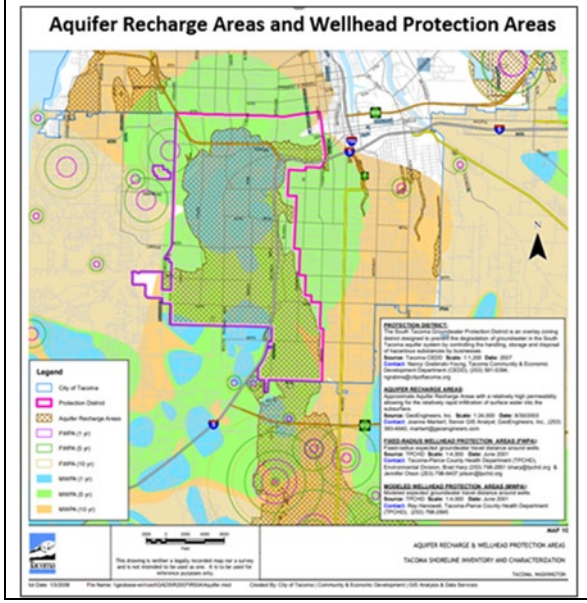
(pp. L-U 8 – L-U 9), in part, states "Limit residential development in close proximity to Interstate-5 due to air quality concerns."

TMC 13.06.040.J.6 Tacoma Mall Neighborhood Regional Growth Center, Residential Uses Prohibited contains a map showing that residential uses are not allowed along Interstate 5 in the RGC.

Figure 4: Tacoma Mall Neighborhood RGC – No Residential Uses

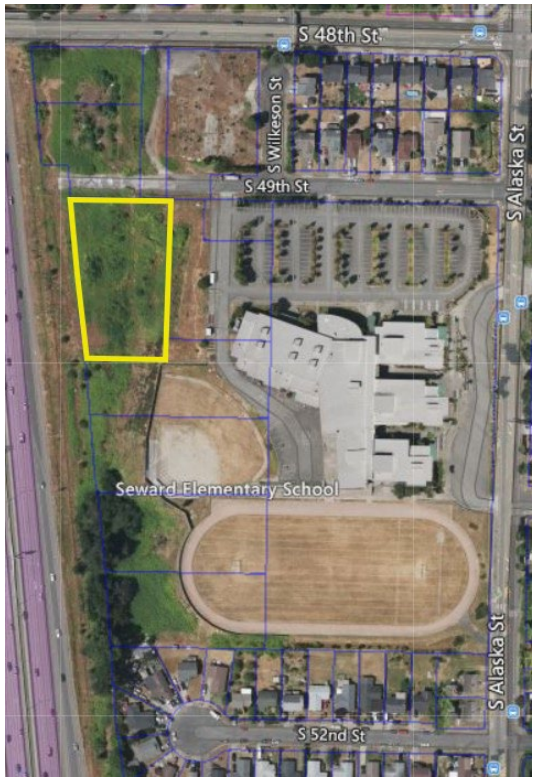


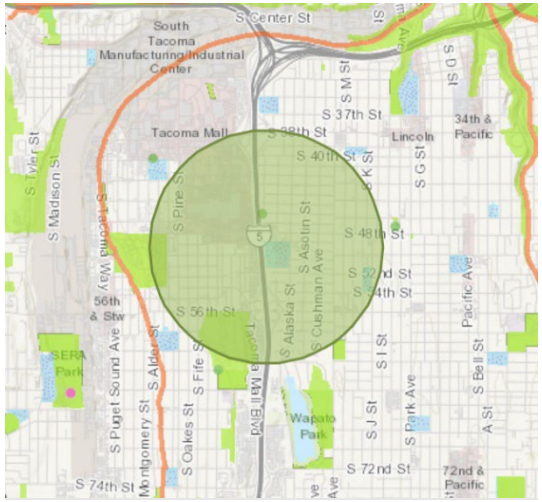
Giaudrone Middle School, adjacent to subject site, is one of nine Tacoma Public Schools (TPS) selected for more targeted air monitoring through the Tacoma Pierce County Health Dept. Urban Air pilot project in partnership with UW Tacoma, TPS, City of Tacoma, and Microsoft.

Earth and Water		
Stormwater Management Manual (2021) South Tacoma Groundwater Protection District Infiltration Policy, ESD17-1 dated Jan. 9, 2017 Side Sewer and Sanitary Sewer Availability Manual (2021) TMC 2.19 Site Development Code TMC 12.08D Stormwater Management TMC 13.06.070.D South Tacoma Groundwater Protection District TMC 13.11 Critical Areas Preservation  	The subject site is vacant and currently undeveloped. The site is located within identified critical area of the South Tacoma Aquifer Recharge Area and the Groundwater Protection District. There are no known impervious surfaces on the subject property. The parcel has been subject to recent applicable permit activity associated with neighboring commercial parcel/s (1821 S 49th St.; 4810 S Wilkeson). This includes: • LU18-0131 Addendum to Existing Environmental Document associated with permit issued 7/27/2021 (SDEV17-0146)- Addendum for Mor Furniture to address placement of fill on subject site rather than exporting fill offsite. [Closed] • SDEV18-0469; S 49th St & 4810 S Wilkeson St - Clear Blackberry bushes and trees; Clear brush and debris to clean up commercial property. (Awaiting Resubmittal/Revisions) A search of the Washington State Dept. of Ecology's "What's in My Neighborhood: Toxics Cleanup" map/database did not reveal any known toxic hazards at the site. The site is within the geographic area of the Tacoma Smelter Plume, and the Dept. of Ecology "Dirt Alert" map/database states that "Predicted Arsenic Concentration: Under 20 ppm."	The subject parcel, being located within an identified Critical Area (aquifer recharge) of the South Tacoma Groundwater Protection District Overlay District, may be subject to additional development and reporting requirements as established in TMC Title 13.06.070.D South Tacoma Groundwater Protection District and TMC 13.11 Critical Areas Preservation. Tacoma's Stormwater Management Manual (SWMM) contains the information needed to regulate stormwater management associated with new development, redevelopment, and construction sites in Tacoma. It also contains source control Best Management Practices (BMPs) for existing sites. The SWMM contains information for design and sizing of stormwater facilities, including those that infiltrate. It also has operational BMPs to keep stormwater runoff clean, which helps to ensure contaminants are not transmitted to receiving waters (groundwater or surface water). The SWMM also details the procedures to evaluate and mitigate stormwater capacity issues related to development of a parcel. Flett Creek is a flow control basin, and if it is determined that a proposed

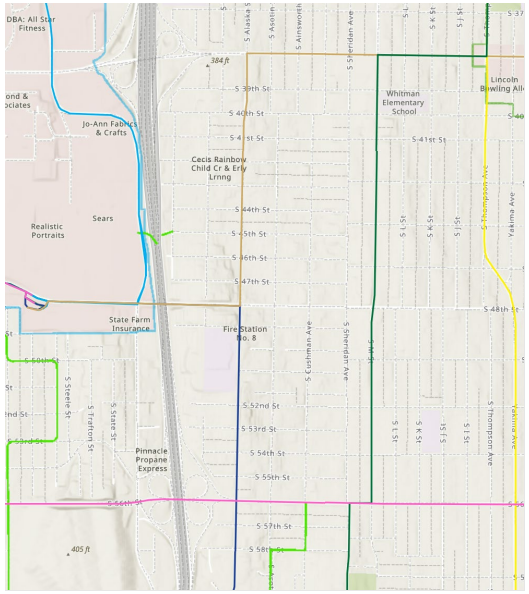
	The parcel contains slopes that range from 25-40% and >40%. Rated "Very Low" Liquefaction Susceptibility. No identified flood hazard, wetlands, streams, or biodiversity area/corridor. Stormwater and Wastewater utility infrastructure in proximity to serve potential development of parcel. The project is located within the Flett Creek Watershed. The Stormwater Management Manual outlines the stormwater mitigation requirements for each watershed.	development project meets impact thresholds, applicant will be required to address flow control and water quality. As a result of these standards, it is unlikely that the proposed development would have a significant adverse impact on water quality and flow control. There is ongoing/upcoming work that will be conducted by City staff to update the South Tacoma Groundwater Protection District Code and the One Tacoma Comprehensive Plan.
Plants and Tree Canopy		
TMC Title 13 Land Use Regulatory Code • TMC 13.06.030.F Commercial District Development Standards • TMC 13.06.090.B Landscaping Standards Urban Forest Manual	The Urban Tree Canopy Assessment (2018) identified 12% urban tree canopy for the U.S. Census block group that the subject site is located within (pg. 19). Tree canopy on site appears to be negligible and there are no mapped or known priority species on site. Additional site-specific review to identify unknown or potential critical areas is conducted as part of permitting.	Overall, staff expects that future development will result in an increase in tree canopy on site based on current conditions and applicable development regulations. Specific landscaping and Tree Canopy requirements will be evaluated at project level and permitting and will be required to be in accordance with standards set in the Urban Forest Manual and other City policies outlined in the TMC. • Parking lot overall tree planting requirements: One Small Tree per 700 square feet; one Medium Tree per 1,000 square feet; or, one

		Large Tree per 1,400 square feet of parking lot area. • Per TMC 13.06.090.B Landscaping Standards, Commercial Zoning Districts have Overall Site Landscaping Minimums of 10 percent, among other standards. • Site Perimeter Landscaping: A minimum 7-foot-wide site perimeter strip shall be provided on sides without abutting street trees… The perimeter strip shall be covered with a mixture of trees, shrubs, and groundcover plants, as follows: (a) At least one Small Tree per 200 sf; one Medium Tree per 300 sf; or one Large Tree per 400 sf of required landscaped area. Finally, of note, under the existing zoning, there are no tree canopy requirements for residential development.
Aesthetics, Light, and Glare		
TMC 13.06.090 Site Development Standards TMC 13.06.100 Building design standards TMC 13.06.100.A Commercial District Minimum Design Standards	The site is currently vacant and undeveloped. There is an existing undeveloped area on the school property to the east that establishes an approximate 100' separation between the subject property and school access. There is approximately 250' separation between subject property and nearest residential property to the northeast (S 49th St & S	Not applicable at this stage of consideration of land use designation change of a vacant/undeveloped parcel. Applicant will be required to meet applicable requirements in project-level stages, including aesthetic requirements

	Wilkerson St.); and approximately 600' separation between nearest residential property to the south.  	detailed in TMC 13.06.100.A Commercial District Minimum Design Standards. TMC 13.06.090.I addresses sign standards. With the site in close proximity to residential parcels, additional standards will need to be met per TMC 13.06.090.J Residential transition standards and other applicable requirements. Transition standards include limits on lighting and light trespass as well as the use of landscape buffers to minimize noise, light, and aesthetic impacts on adjacent properties. Noise-related impacts and mitigations will also be assessed at project-level. Any development would be required to meet the standards detailed in TMC 8.122 Noise Enforcement.
Parks and Recreation		
TMC Title 13.06.090 Site Development Standards • TMC 13.06.090.F Pedestrian and bicycle support standards	The subject site is mapped in the One Tacoma Plan as an educational facility, as it was previously owned by the school district, and is identified as part of the City's overall park and recreation system.	The proposed land use designation change is not anticipated to displace any existing recreational uses. While the parcel is identified as an educational facility as part of the City's recreation system, the

	The following map depicts a ¾ mile radius from the subject site as compared to the City's planned park and recreation system. While several facilities are within this walk distance, the majority of sites require crossing I-5 or other busy arterials.  	specific subject site is not improved to provide any recreational value. The dearth of walkable recreation facilities near this site, and impediments to existing sites, likely would result in new residential development under the baseline zoning being more dependent on SOV trips to meet recreational needs.
Historic and Cultural Preservation		
TMC 13.12.570 Archaeological, Cultural, and Historic Resources	No known archaeological, cultural, or historic resources on site. No historic districts or overlays apply to the property.	Per TMC 13.12.570.C Unanticipated Discovery of Archaeological, Cultural and Historic Resources, "All permit applications shall prepare a plan for the possible unanticipated discovery of historic, cultural or archaeological resources, including a point of contact, procedure for stop-work notification, and for notification of appropriate agencies."

Transportation		
TMC 13.06.090.F Pedestrian and bicycle support standards 13.06.100 Building design standards (A. Commercial District Minimum Design Standards) TMC 13.12.580 Traffic Impact Assessment Destination 2040: Pierce Transit Long Range Plan Update (2020)	Auto: Several streets in close proximity to subject site are designated arterials per TMC 11.05.490 Arterial streets designated: • Auto: South 48th Street from Pacific Avenue to Wapato Street is a minor arterial (protected streets that have a near balanced percentage of long-distance vehicle trips, with local access usage) • South Alaska Street from S 38th Street to 72nd Street is a collector arterial (protected streets that have a low percentage of long-distance vehicle trips) A portion of S 49th Street which serves the subject site has been vacated and is part of parcels B, C, D and E which are zoned for general commercial uses. Transit: The City's Transportation Master Plan (TMP) identifies S 48th Street (Medium Intensity) and S Alaska Street (Low Intensity) in the future Transit Priority Network. Pierce Transit Route 54 currently serves S 48th Street but proceeds north on S Alaska Street and then east onto S 38th Street. Route 55 serves 48th Street before proceeding south on S Alaska Street. Both routes provide access to the Tacoma Mall. Destination 2040 Pierce	Automobile Trip Generation: Any Future development of the site will result in increased number of trips intersecting with existing and planned bike infrastructure as well as school walking routes. A trip generation analysis, dated December 22, 2022, was conducted by Jake Traffic Engineering (JTE) and concluded that the proposed General Commercial Mor Furniture Store use is projected to generate fewer trips than Low Scale Residential (single and multifamily) uses; potential for five PM peak hour trips to street grid; no documented issues with traffic safety at intersections and streets near subject site; and no documented conflicts with existing pedestrian, bicycle, or transit infrastructure or level of service. If the proposed land use designation change to General Commercial were to be approved, the applicant could then pursue a site rezone and may be subject to additional traffic study requirements and/or conditions for approval to help mitigate any impacts that may be identified through SEPA or City standards. Preliminary site plans indicate that sole access to the site will be from S 48th Street. Emergency vehicle access to the site may be available at South 49th Street.

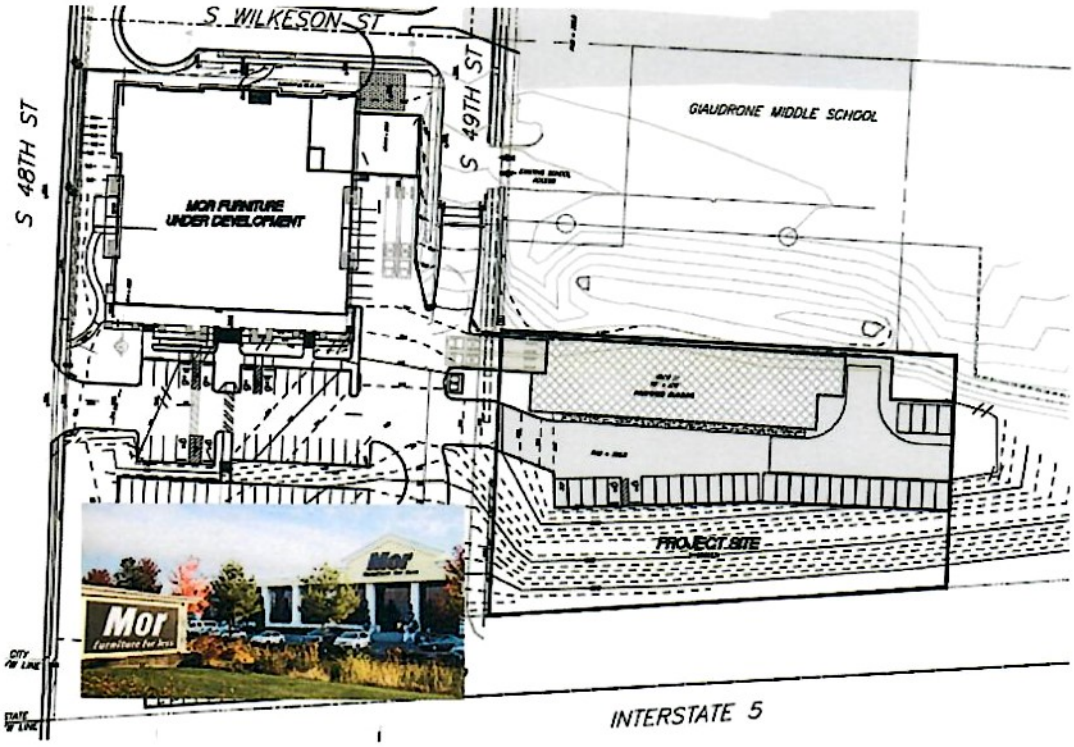
	Transit Long Range Plan Update (2020) notes Fixed Route Network Restructuring beginning in March 2017 and identified modifications in "Frequency, Span, or Run Time Improvements" for Routes 54 and 55. Routes 54 and 55 are identified as Urban Routes that "serve arterial streets within urbanized areas" and "operate most days of the week, providing somewhat frequent service on weekdays with some night and weekend service."  Pedestrians: The neighborhoods surrounding the subject site are generally constructed on a grid with adequate route directness and basic pedestrian facilities. However, the subject site and its immediate vicinity lacks	One anticipated impact of development to a commercial use is increased vehicular and truck traffic on roadways within vicinity of the subject parcel. Potential impacts will be assessed at the project-level and subject to TMC Title 13.06.090 Site Development Standards and TMC 13.06.090.F Pedestrian and bicycle support standards. Pedestrian: The City has site development and design standards that the applicant would need to meet at the permitting/development stages of the project, including TMC 2.22.040 "Off-site improvements shall be required for all New Construction" proportional and related to development. Bicycle: The City's current plans include future bike facilities at this location and planning studies to evaluate improvements to the I-5 crossing to help facilitate increased active transportation safety and options. Transit: The Pierce Transit Stream System Expansion Study includes an alternative alignment on S 48th Street adjacent to this development. Under the baseline zoning, the site could be developed for residential uses. However, residents at this subject site

	pedestrian connections to the surrounding neighborhoods due to the middle school, I-5, and commercial properties to the north. Bicycles: S 48th Street and S Alaska Street are identified as bicycle priorities in the Bicycle Priority Network per the TMP. The section of S Alaska Street (Collector or Nonclassified Arterial) in vicinity to the subject site does have bicycle lanes. The section of S 48th Street (Minor Arterial) in vicinity to the subject site does not have bicycle-specific infrastructure. The TMP identifies proposed bicycle lanes on S 48th Street as part of Short-Term Bicycle Network Recommendations. Vision Zero: The Tacoma Vision Zero identifies section of S 48th Street in vicinity of the subject site as a High Risk Network for multiple modes, including as Pedestrian and Bicycle Corridors. According to the City of Tacoma Equity Index, the subject site is within an area rated in the lowest quintile for Average Road Quality in the City of Tacoma. Interstate 5 crossing study over/under S 48th Street overpass tentatively expected to begin Summer 2023.	would likely be more auto-dependent due to the lack of immediate connectivity and walkable destinations.

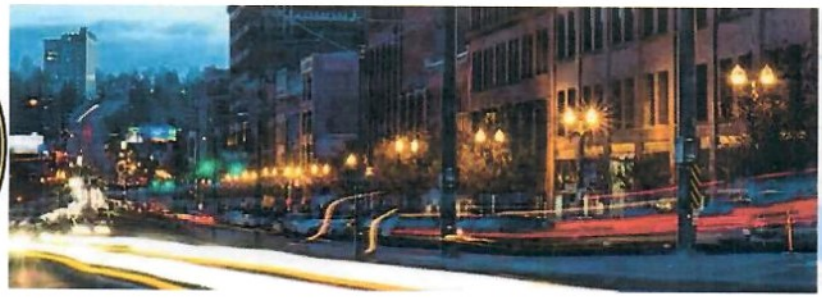
Tacoma

MOR FURNITURE REZONE TRANSPORTATION MEMORANDUM

December 22, 2022



JTE . Jake Traffic Engineering, Inc.
Mark J. Jacobs, PE, PTOE, President
2614 39th Ave SW – Seattle, WA 98116 – 2503
Tel. 206.762.1978 - Cell 206.799.5692
E-mail jaketraffic@comcast.net



JTE . Jake Traffic Engineering, Inc. .

Mark J. Jacobs, PE, PTOE
President
2614 34th Ave. SW – Seattle, WA 48116 – 2503
Tel. 206.762.1478 - Cell 206.744.5642
E-mail jaketraffic@comcast.net

December 22, 2022

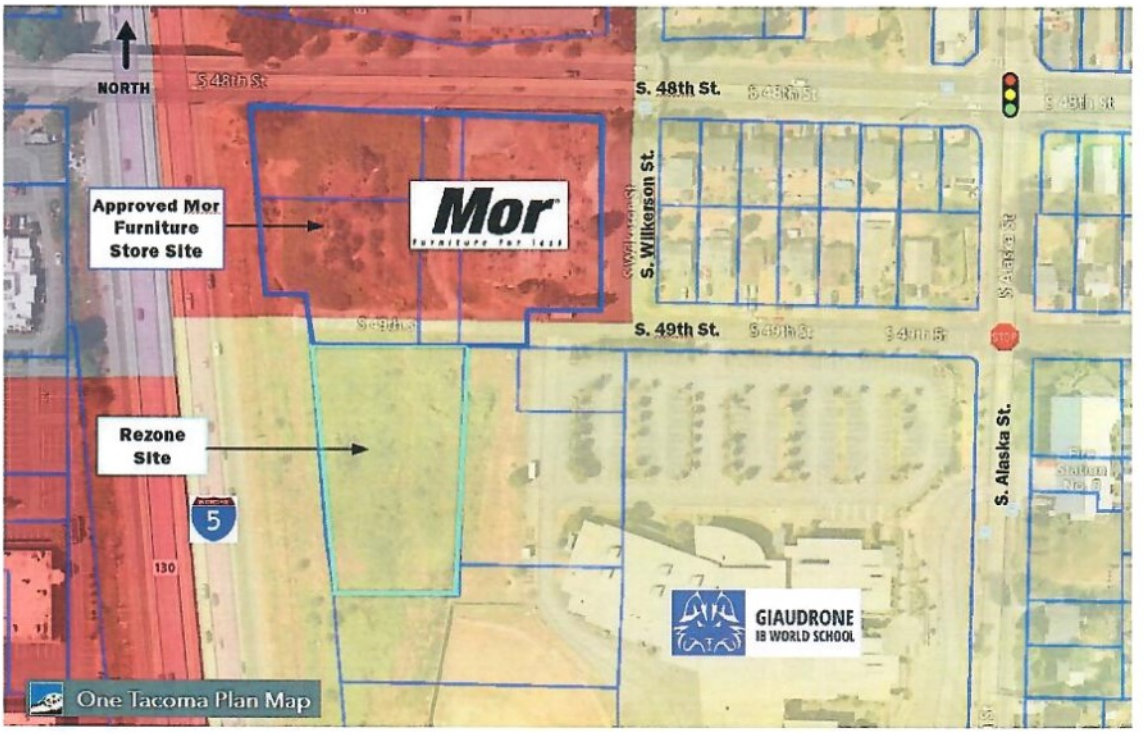
CITY OF TACOMA
Attn: Jennifer Kammerzell, Assistant Division Manager
747 Market Street
Tacoma, WA 98402

Re: Mor Furniture Rezone – Tacoma
Transportation Memorandum

Dear Ms. Kammerzell,

I have prepared this Traffic Memorandum - in response to our correspondence that the Technical E-mail sent to the City on 10.04.2022 be provided in a more formal format with additional narrative.

The proposed project is a 10,175 sf commercial building to provide storage of furniture supplies for the Mor Furniture facility located to the north. Access to the project is proposed via a connection through the Mor Furniture Site. An aerial of the site obtained from Tacoma GIS, augmented, is below:



The project proposal is to rezone the site from R-2 to C-2 that the City requested traffic generation data be provided for the site based on the Proposed Use, potential uses under the proposed Zoning and the existing Zoning.

I understand that the R2 zoning allows 1 SFD and 1 ADU per parcel and presuming the parcel were to be subdivided into three the following:

My 10.24.2022 Technical E-mail provided the site Trip Generation, discussed traffic operations and conducted a safety inspection.

Project Description

A copy of the preliminary Site Plan prepared by Larson and Associates dated 03.31.2022. The plan depicts the commercial building, 33 parking stalls including two accessible stalls and access via the Mor Furniture Store that is underdevelopment. In addition a gated emergency access via S. 49th St. is also depicted.

Site Zoning

I understand from correspondence with the project team the following:

The existing zoning is R-2, single family residential.

1. *Using the max available pad area (27000 sf) the largest possible development would be:*
    a. *5000 SF min lot size, assume 4 lot split with fire lane.*
        i. *(1) two family residence with accessory buildings (ADU & garages) each lot (4 total)*
        ii. *Staffed residential homes, short term rentals (2 guest rooms) , group homes with max 6 unrelated adults*
    b. *Parking required: 4 two family homes, 2 cars ea dwelling = 16 parking spaces required (TMC 13.06.090 C Table 1)*
    c. *35' max building height*

The proposed zoning is C-2, General Commercial, maximum possible intensity:

1. *Max floor area per zoning code = 45000 sf, max height 45'*
2. *Using max available pad area (27000SF), retail use over podium parking is max density*
    a. *Assume 216000 SF parking available +-(80% pad area)*
    b. *Max possible is a 30 stall double loaded parking lane under podium (60 spaces net)*
    c. *Floor area limited by parking (60 spaces)*
        i. *Office parking: 3/1000SF = 20,000SF offices*
        ii. *Dining parking: 6/1000SF = 10,000SF restaurant*
        iii. *Retail parking > 15000SF: 4/1000 SF = 24000SF retail*

The proposed use of the property is warehouse with light retail.

1. *Proposed ~~10,000~~ 10,175 SF building net, with 33 parking stalls on grade and a fire lane.*
    a. *Warehouse required parking is 1/2000SF = 5 spaces required for 100% warehouse*
    b. *Retail <15000SF required parking is 2.5/1000 = 25 spaces required for 100% retail.*

City staff provided information on 11.18.2022 document from the "Urban Form" chapter of the One Tacoma Comprehensive Plan. Note that for Low-Scale Residential, the target development density is 10-25 dwelling units/net acre. From this information I understand that the existing zoning could accommodate up to 10 – SFDU's or 20-multifamily units.

Site Traffic Generation

Definitions

A vehicle trip is defined as a single or one direction vehicle movement with either the origin or destination (exiting or entering) inside the proposed development.

Traffic generated by development projects consists of the following types:

Pass-By Trips:	Trips made as intermediate stops on the way from an origin to a primary trip destination.
Diverted Link Trips:	Trips attracted from the traffic volume on a roadway within the vicinity of the generator but which require a diversion from that roadway to another roadway in order to gain access to the site.
Captured Trips:	Site trips shared by more than one land use in a multi-use development.
Primary (New) Trips:	Trips made for the specific purpose of using the services of the project.

Site Trip Generation

The Institute of Transportation Engineers Trip Generation 11th Edition provides trip generation data for a variety of Land Use Codes (LUC's). Review of the ITE data indicates the proposed use would be Furniture Store and the other C-2 zoning uses, albeit extremely unlikely, could be Commercial Office, a Restaurant or Retailing uses. The ITE LUC's for these uses are 890, 710, 932 and 822, respectively. The existing zoning land, R2, allows for Single Family Detached housing, LUC 210 and Multifamily (Low-Rise housing , LUC 220. All site trips made by all vehicles for all purposes, including commuter, visitor, and service and delivery vehicle trips are included in the ITE trip generation values.

Table 1 below depicts the site traffic generation.

TABLE 1 - VEHICULAR TRIP GENERATION
MOR FURNITURE FACILITY - TACOMA
TRANSPORTATION MEMORANDUM

Time Period	Size (X)	TG Rate	Enter %	Enter Trips	Exit %	Exit Trips	Total (T)	Pass-by %*	Pass-by Trips	Net Total
Proposed Zoning (C-2 General Commercial) and Use: Furniture Store (ITE LUC 890; 10,175 sf)										
Weekday	10,175	6.3	50%	32	50%	32	64	–	–	–
AM peak hour	10,175	0.26	71%	2	29%	1	3	–	–	–
PM peak hour	10,175	0.51	47%	2	53%	3	5	53%	3	2
Proposed Zoning (C-2 General Commercial) and Office Use: General Office Building (ITE LUC 710; 20,000 sf)										
Weekday	*20,000*	*10.84*	*50%*	*108*	*50%*	*108*	*217*	–	–	–
AM peak hour	*20,000*	*1.52*	*88%*	*27*	*12%*	*4*	*30*	–	–	–
PM peak hour	*20,000*	*1.44*	*17%*	*5*	*83%*	*24*	*29*	–	–	–
Proposed Zoning (C-2 General Commercial) and Restaurant Use: High-Turnover (Sit-Down) Restaurant (ITE LUC 932; 10,000 sf										
Weekday	*10,000*	*107.2*	*50%*	*536*	*50%*	*536*	*1072*	–	–	–
AM peak hour	*10,000*	*9.57*	*55%*	*53*	*45%*	*43*	*96*	–	–	–
PM peak hour	*10,000*	*9.05*	*61%*	*55*	*39%*	*36*	*91*	*43%*	*39*	*52*
Proposed Zoning (C-2 General Commercial) and Retail Use: Strip Retail Plaza (<40k) (ITE LUC 822; 24,000 sf)										
Weekday	*24,000*	*54.45*	*50%*	*653*	*50%*	*653*	*1307*	–	–	–
AM peak hour	*24,000*	*2.36*	*60%*	*34*	*40%*	*23*	*57*	–	–	–
PM peak hour	*24,000*	*6.5*	*50%*	*78*	*50%*	*78*	*156*	*34%*	*53*	*103*
Existing Zoning (R-2 Residential): Single Family Detached Housing - General Urban/Suburban (ITE LUC 210; 10-units)										
Weekday	(10)	9.43	50%	(47)	50%	(47)	(94)	–	–	–
AM peak hour	(10)	0.7	26%	(2)	74%	(5)	(7)	–	–	–
PM peak hour	(10)	0.94	63%	(6)	37%	(3)	(9)	–	–	–
Existing Zoning (R-2 Residential): Multifamily Housing (Low-Rise)- General Urban/Suburban (ITE LUC 220; 20-units)										
Weekday	*(20)*	*6.74*	*50%*	*(67)*	*50%*	*(67)*	*(135)*	–	–	–
AM peak hour	*(20)*	*0.4*	*24%*	*(2)*	*76%*	*(6)*	*(8)*	–	–	–
PM peak hour	*(20)*	*0.51*	*63%*	*(6)*	*37%*	*(4)*	*(10)*	–	–	–
Delta Difference: Proposed Zoning and Use - Existing Zoning (presuming SFDU)										
Weekday	–	–	–	(15)	–	(15)	(30)	–	–	–
AM peak hour	–	–	–	0	–	(4)	(4)	–	–	–
PM peak hour	–	–	–	(3)	–	(1)	(4)	–	–	–

Where X = number of units or sf and T = Trips; parenthesis (xx) denote negative values
* - Pass-by rates per ITE, local Agency data and Traffic Engineering Experience, residential trips are typically considered new thus for analysis no pass-by to account for service/delivery type trips is taken
Trip rates per the Institute of Transportation Engineers Trip Generation Manual 11th Edition
Note: Due to rounding some values may not add up

The proposed use development project is projected to generate fewer trips than what could occur under the existing zoning for the subject project site.

Traffic Operations

I conducted S. 48th St. Mor Furniture Traffic Impact Analysis dated 02.03.2014. This report Per correspondence with the City studied the following intersections:

1. S. 48th St./Tacoma Mall Boulevard
2. S. 48th St./Lacey's Furniture Store driveway
3. S. 48th St./S. Alaska St.

The City also requested the following items be incorporated into the traffic report.

- *The proposed driveway access onto South 48th and its on-site circulation and connection with the residential roadway of South 49th on the south side of the site will need to be assessed for potential neighborhood/school cut-through potential.*
- *Please indicate the likely truck delivery entry/exit routes and access to/from the site, especially with respect to the above cut-through scenario (i.e., likely sensitivity of the surrounding neighborhood)*
- *In your discussion of the proposed operation/channelization of the center lane/median, please include operations, queue expectations, two-stage left-turn impacts, etc. in addition to any proposed re-channelization (diagrammatic is fine) that would be implemented by the developer to facilitate their desired access plan*
- *Your discussion of trip generation for the site should consider the likelihood that a Saturday afternoon is probably its peak demand (as would be for the Macy's driveway on the north)—therefore, you may be able to perform a quick supplemental analysis of opening year conditions for an ***estimated*** Saturday afternoon scenario (approximation of Saturday demand on 48th is acceptable using, or basing from, the weekday PM peak period).*

The projected 2019 Traffic Operations at the study intersections I studied in my 2014 report were LOS 'C and better. The potential addition of five PM peak hour trips to the street grid via the Mor Furniture driveway on S. 48th St. would not materially affect traffic operations.

Safety Inspection

Incident data was reviewed using the WSDOT accident data portal available online at https://remoteapps.wsdot.wa.gov/highwaysafety/collision/data/portal/public/. This portal was used to review incidents in the site vicinity for the years 2017 to 2021. The WSDOT data is attached.

Inspection of the data does not indicate any apparent issue the intersections and streets near the site.

Note: A fatal incident occurred at the S. 49th St at S. Asotin intersection to the east in 2019. One other property damage incident occurred in 2018 at the intersection. Google Streetview inspection of the intersection (July 2021 data) showed the intersection as uncontrolled with no apparent sight obstructions. The incident history at the intersection indicates it is operating satisfactorily.

Pedestrian/Transit/Bicycle (General)

Sidewalks exist on the streets in the site area. A traffic control signal at the S. 48th St at S. Alaska St. provides marked crosswalks and pedestrian activated crossing. Additionally a pedestrian overcrossing structure exists across S. 48th St. at the S. Wilkerson St. alignment.

The site is served by Pierce Transit. Review of the System Map, 12.12.2022, identifies that the site is served by two routes 54 and 55. More information on transit is available at:

https://www.piercetransit.org/pierce-transit-routes/

In my site inspection, I note that there are bike lanes on both sides of S. Alaska Street. Residential streets also work well and for an experienced bicyclist taking the curb lane on a multilane street is a viable option.

Summary

I have prepared this Transportation Memorandum in response to your request for a Traffic Impact Analysis. Per ITE data the site rezone to the proposed use for Mor Furniture would generate about five PM peak hour trips that are fewer than what the existing underlying zoning would allow. Per my review my prior work on the Mor Furniture Store ample capacity exists on S. 48th street and other streets in the site vicinity.

Traffic safety was also inspected and no apparent issue is noted.

Pedestrian sidewalks exist in the site vicinity and a pedestrian overcrossing exists across S. 48th Street. A signalized crossing at S. 48th St. at S. Alaska St. facilitates the Pierce Transit bus stops near the site.

Based on my analysis I recommend that the rezone be allowed with the following traffic impact mitigation.

> Develop the site, site circulation and accesses in accordance with applicable City requirements.

No other traffic mitigation should be necessary. Please contact me at 206.762.1978 or email us at jaketraffic@comcast.net if you have any questions.

Sincerely,

Mark J. Jacobs, PE, PTOE, President
JAKE TRAFFIC ENGINEERING, INC

12.22.2022

MJJ: mjj

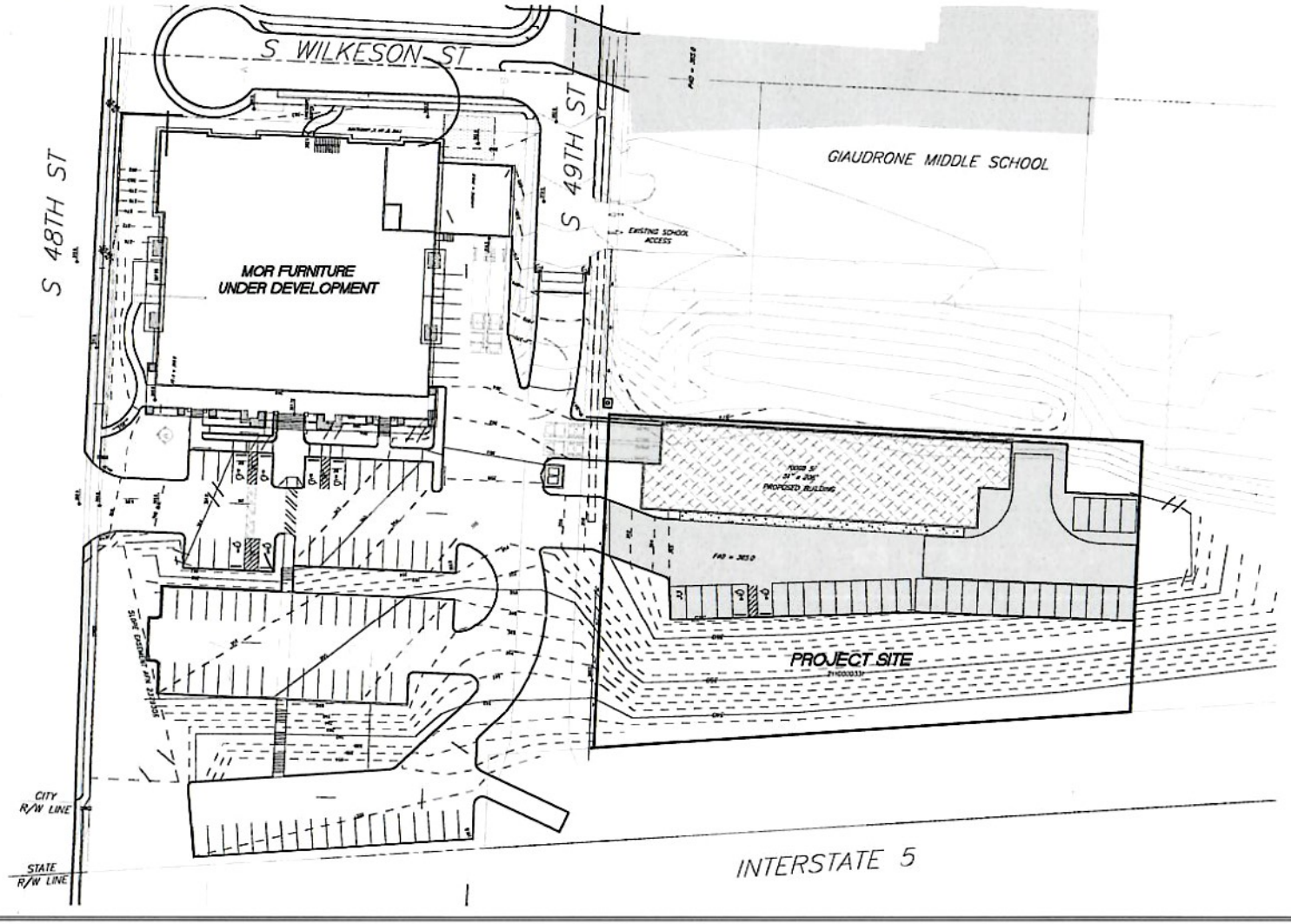
MOR FURNITURE OF TACOMA

NW 1/4, SECTION 20, TOWNSHIP 20 NORTH, RANGE 3 EAST, W.M.
CITY OF TACOMA, PIERCE COUNTY WASHINGTON

COMPREHENSIVE PLAN LAND USE DESIGNATION AND REZONE
PRELIMINARY COMMERCIAL SITE PLAN

SITE ADDRESS
1824 S 49th ST
TACOMA, WA

PARCEL NUMBER
2120200339



SCALE: 1"=30'
0 15 30 60

BASIS OF BEARING: CITY OF TACOMA BASED ON:

MONUMENT No. 121 SURFACE BRASS CAP AT 48TH ST AND ALASKA ST (WESTERLY MON)
N: 691705.193
E: 1153398.936

MONUMENT No. 152 SURFACE BRASS CAP AT 48TH ST AND ASOTIN ST
N: 691767.731
E: 1154258.361

S87°53'10"E 469.73'(R) 469.76'(M)

VERTICAL DATUM: (NGVD29)
CITY OF TACOMA BENCHMARK No. 857
ELEVATION = 338.534'

CONTOURS = 2'

CONTOUR INTERVAL=2'
TOPOGRAPHY PREPARED BY LARSON & ASSOCIATES

LEGEND

- PROPERTY LINE
- R/W LINE
- EASEMENT LINE
- ADDITIONAL 10' UTILITIES EASEMENT
- 456 PROPOSED CONTOUR
- EXISTING CONTOUR
- EXISTING EDGE OF PAVEMENT
- EXISTING SANITARY SEWER MANHOLE
- EXISTING SANITARY SEWER MAIN
- PROPOSED SANITARY SEWER MANHOLE
- PROPOSED SEWER PIPE
- PROPOSED SANITARY SEWER STUB
- EXISTING STORM MANHOLE
- EXISTING STORM MAIN
- EXISTING CATCH BASIN
- PROPOSED STORM DRAIN MANHOLE
- PROPOSED STORM YARD DRAIN
- PROPOSED STORM CATCH BASIN
- PROPOSED STORM PIPE
- PROPOSED STORM STUB
- EXISTING POWER POLE
- EXISTING WATER GATE VALVE
- EXISTING WATER MAIN
- PROPOSED WATER VALVE
- PROPOSED WATER LINE
- PROPOSED WATER METER
- EXISTING TELEPHONE RISER
- EXISTING POWER J-BOX
- EXISTING SIDEWALK
- PROPOSED SIDEWALK
- PROPOSED STANDARD ASPHALT PAVEMENT
- PROPOSED HEAVY DUTY ASPHALT PAVEMENT
- PROPOSED EXTRUDED CURB
- PROPOSED POURED-IN-PLACE CURB
- PROPOSED RETAINING WALL

3/31/2022

CVR

JOB NUMBER	8346
SCALE	HOR 1"=30' VERT. N/A
DESIGNED SC	
DRAWN PB	
CHECKED CJM	

PROPONENT: WESCO MANAGEMENT, LLC
8255 MIRAMAR RD, SUITE 300
SAN DIEGO, CA 92126

LARSON and ASSOCIATES
surveyors, engineers & planners
TACOMA, WA 98466 (253) 272-3404

PRELIMINARY COMMERCIAL SITE PLAN

DATE	3/31/2022
DRAWING NO	8346BASE
SHEET 1 OF 1	

APPENDIX

From: Kammerzell, Jennifer [mailto:JKammerzell@cityoftacoma.org]
Sent: Monday, November 14, 2022 5:53 PM
To: Mark J Jacobs, PE, PTO
Cc: 'Scott Clark'; 'Grant Middleton'; 'Mike Zeller'; 'Chuck Jackson'; 'Rick Haux Jr'; Nolan, Adam
Subject: RE: 2022.061 - Mor Furniture Storage Building - Tacoma (8346)

Hi Mark – Apologies for the delay. I'm available tomorrow at 4:30, Thursday 10-11 or Friday after 1:30p. Let me know and I can set up a Teams call to walk thru what you provided below. I recognize this is for the rezone only, but want to anticipate what might come up as part of the review and also provide the applicant with possible mitigation that comes up from the site SEPA too.

Jennifer Kammerzell
Interim Transportation Division Manager
City of Tacoma - Public Works Dept.
(253) 591-5511
jkammerzell@cityoftacoma.org
Pronouns: she/her

From: Mark J Jacobs, PE, PTO <JakeTraffic@comcast.net>
Sent: Monday, November 14, 2022 3:01 PM
To: Kammerzell, Jennifer <JKammerzell@cityoftacoma.org>
Cc: 'Scott Clark' <SClark@rrlarson.com>; 'Grant Middleton' <gmiddleton@rrlarson.com>; 'Mike Zeller' <mzeller@morfurniture.com>; 'Chuck Jackson' <cejackson@cox.net>; 'Rick Haux Jr' <rhjr@morfurniture.com>
Subject: RE: 2022.061 - Mor Furniture Storage Building - Tacoma (8346)

Jennifer

Are you available to discuss sometime this week except Wednesday after 1100? AM's tend to work best for me.

Thank you

Mark
206.762.1978 o
206.799.5692 c

From: Mark J Jacobs, PE, PTO [mailto:JakeTraffic@comcast.net]
Sent: Wednesday, November 09, 2022 10:18 AM
To: 'jkammerzell@CityofTacoma.org'
Cc: 'Scott Clark'; 'Grant Middleton'; 'Mike Zeller'; 'Chuck Jackson'; 'Rick Haux Jr'
Subject: RE: 2022.061 - Mor Furniture Storage Building - Tacoma (8346)

Jennifer

Can we set up a time to discuss, say Thursday or Friday AM around 9ish?

Thank you

Mark

From: Mark J Jacobs, PE, PTO [mailto:JakeTraffic@comcast.net]
Sent: Monday, October 24, 2022 3:54 PM
To: 'jkammerzell@CityofTacoma.org'
Cc: 'Scott Clark'; 'Grant Middleton'; 'Mike Zeller'; 'Chuck Jackson'; 'Rick Haux Jr'
Subject: 2022.061 - Mor Furniture Storage Building - Tacoma (8346)

Jennifer

Per our correspondence mid September I have requested the maximum potential development for the site with the rezone. I conducted TG for the proposed rezone scenarios and for what the project Applicant is actually proposing, see below and attached.

TABLE 1 - VEHICULAR TRIP GENERATION (PRELIMINARY)
MOR FURNITURE FACILITY - TACOMA
TRANSPORTATION MEMORANDUM

Time Period	Size (X)	TG Rate	Enter %	Enter Trips	Exit %	Exit Trips	Total (T)	Pass-by %*	Pass-by Trips	N
Proposed Zoning (C-2 General Commercial) and Use: Furniture Store (ITE LUC 890; 10,175 sf)										
Weekday	10,175	6.3	50%	32	50%	32	64	–	--	
AM peak hour	10,175	0.26	71%	2	29%	1	3	–	--	
PM peak hour	10,175	0.51	47%	2	53%	3	5	53%	3	
Proposed Zoning (C-2 General Commercial) and Office Use: General Office Building (ITE LUC 710; 20,000 sf)										
Weekday	20,000	10.84	50%	108	50%	108	217	--	--	
AM peak hour	20,000	1.52	88%	27	12%	4	30	--	--	
PM peak hour	20,000	1.44	17%	5	83%	24	29	--	--	
Proposed Zoning (C-2 General Commercial) and Restaurant Use: High-Turnover (Sit-Down) Restaurant (ITE LUC 932; 10,000 s										
Weekday	10,000	107.2	50%	536	50%	536	1072	--	--	
AM peak hour	10,000	9.57	55%	53	45%	43	96	--	--	
PM peak hour	10,000	9.05	61%	55	39%	35	91	43%	39	
Proposed Zoning (C-2 General Commercial) and Retail Use: Strip Retail Plaza (<40k) (ITE LUC 822; 24,000 sf)										
Weekday	24,000	54.45	50%	653	50%	653	1307	--	--	
AM peak hour	24,000	2.36	60%	34	40%	23	57	--	--	
PM peak hour	24,000	6.5	50%	78	50%	78	156	34%	53	
Existing Zoning (R-2 Residential): Single Family Detached Housing- General Urban/Suburban (ITE LUC 220; 4-units)										
Weekday	(4)	9.43	50%	(19)	50%	(19)	(38)	–	--	
AM peak hour	(4)	0.7	24%	(1)	76%	(2)	(3)	–	--	
PM peak hour	(4)	0.94	63%	(2)	37%	(1)	(4)	–	--	
Delta Difference: Proposed Zoning and Use - Existing Zoning										
Weekday	–	–	–	13	–	13	26	–	--	
AM peak hour	–	–	–	1	–	-1	0	–	--	
PM peak hour	–	–	–	0	–	1	1	–	--	

Where X = number of units or sf and T = Trips; parenthesis (xx) denote negative values

* - Pass-by rates per ITE, local Agency data and Traffic Engineering Experience, residential trips are typically considered new thus for analysis no pass-by to account for service/delivery type trips is taken

Trip rates per the Institute of Transportation Engineers Trip Generation Manual 11th Edition

Note: Due to rounding some values may not add up

The proposed use as a Furniture Store Storage would generate about 26 more daily trips (not adjusted for pass-by) than the existing residential zoning. During the PM peak hour one added trip at access but fewer net new to the street grid.

Site access would be via the Mor Furniture Store site that is under development that accesses S. 48th Street. A gated EVA only to S. 49th Street is also noted on the Site Plan.

The projected 2019 Traffic Operations at the I/S's I studied in my 2014 were LOS 'C and better. Review of the City's web site for new TMC data showed the City incorporated the data in the TIA to the public domain.

I inspected the 2017 to 2021 Incidents using the WSDOT portal; no apparent safety issue is noted.

Summary

The proposed use rezone would not generate significant traffic volumes, only about five PMPHT's, and when compared to the existing zoning the delta difference in peak hour traffic is negligible. I have noted the TG for the potential other uses with the rezone to C-2 that are not likely to occur at this location that is not conducive to the other potential uses. The proposed Mor Furniture Store storage use of the site would be a good use for the site with minimal traffic affect.

What additional information does the City need?

Thank you

Mark

Mark J. Jacobs, PE, PTOE
JAKE TRAFFIC ENGINEERING, INC
2614 39th Ave. SW
Seattle, WA 98116 - 2503
206.762.1978 o
206.799.5692 c

From: Chuck Jackson [mailto:cejackson@cox.net]
Sent: Friday, September 16, 2022 2:19 PM
To: 'Rick Haux Jr'; 'Mark J Jacobs, PE, PTO'
Cc: 'Scott Clark'; 'Grant Middleton'; 'Mike Zeller'
Subject: RE: 2022.0616 - Mor Furniture Storage Building - Tacoma (8346)

The existing zoning is R-2, single family residential.

1. Using the max available pad area (27000 sf) the largest possible development would be:
    a. 5000 SF min lot size, assume 4 lot split with fire lane.
        i. (1) two family residence with accessory buildings (ADU & garages) each lot (4 total)
        ii. Staffed residential homes, short term rentals (2 guest rooms) , group homes with max 6 unrelated adults
    b. Parking required: 4 two family homes, 2 cars ea dwelling = 16 parking spaces required (TMC 13.06.090 C Table 1)
    c. 35' max building height

The proposed zoning is C-2, General Commercial, maximum possible intensity:

1. Max floor area per zoning code = 45000 sf, max height 45'
2. Using max available pad area (27000SF), retail use over podium parking is max density
    a. Assume 216000 SF parking available +-(80% pad area)
    b. Max possible is a 30 stall double loaded parking lane under podium (60 spaces net)
    c. Floor area limited by parking (60 spaces)
        i. Office parking: 3/1000SF = 20,000SF offices
        ii. Dining parking: 6/1000SF = 10,000SF restaurant
        iii. Retail parking > 15000SF: 4/1000 SF = 24000SF retail

The proposed use of the property is warehouse with light retail.

1. Proposed 10000 SF building net, with 33 parking stalls on grade and a fire lane.
    a. Warehouse required parking is 1/2000SF = 5 spaces required for 100% warehouse

b. Retail <15000SF required parking is 2.5/1000 = 25 spaces required for 100% retail.

Let me know if this is works for what Jennifer is requesting.
Thanks,
Chuck

Charles Jackson Architect
760 744-6014

From: Rick Haux Jr [mailto:rhjr@morfurniture.com]
Sent: Friday, September 16, 2022 10:29 AM
To: Mark J Jacobs, PE, PTO
Cc: Scott Clark; Grant Middleton; Chuck Jackson; Mike Zeller
Subject: Re: 2022.0616 - Mor Furniture Storage Building - Tacoma (8346)

[INTERNAL EMAIL]

My understanding is and outlet store
So light retail and storage and the building size is 10k ft

Chuck please confirm

Thanks Rick

Sent from my iPhone

On Sep 16, 2022, at 10:12 AM, Mark J Jacobs, PE, PTO <JakeTraffic@comcast.net> wrote:

[EXTERNAL EMAIL]

Scott

I had a conversation with Jennifer at the City yesterday.

What need from the team is:

1. Existing zoning and what could be built on the site max
2. Proposed zoning and what could be built on the site, most intense use
3. Clarification on what the proposal is to be used for

Contact me with any questions.

Thank you

Mark
206.762.1978 o

206.799.5692 c

Scott

Please send me a pdf of the preliminary site plan.

Thank you

Mark

From: Scott Clark [mailto:SClark@rrlarson.com]
Sent: Wednesday, November 23, 2022 9:22 AM
To: Mark J Jacobs, PE, PTO
Cc: ANolan@CityofTacoma.org
Subject: RE: 2022.061 - Mor Furniture TIA - Low scale residential densities

Good morning, Mark.

Please make the 10 unit scenario SFRs, and the 20 unit scenario multi-family. Thanks, Mark; happy holidays!!

Best regards,
Scott Clark
Principal Planner
Secretary
Office: 253-474-3404
Cell: 253-625-3340

LARSON AND ASSOCIATES
surveyors, engineers & planners
WWW.RRLARSON.COM

From: Mark J Jacobs, PE, PTO <JakeTraffic@comcast.net>
Sent: Wednesday, November 23, 2022 8:07 AM
To: Scott Clark <SClark@rrlarson.com>
Cc: ANolan@CityofTacoma.org
Subject: 2022.061 - Mor Furniture TIA - Low scale residential densities

Scott

Would all the scenarios you noted be SFDU values? The ITE LUC for SFDU is 210 (I inadvertently typed in 220; the Trip Generation rates used are for SFDU)

Gobble Gobble

Mark
206.762.1978 o
206.799.5692 c

From: Scott Clark [mailto:SClark@rrlarson.com]
Sent: Tuesday, November 22, 2022 4:23 PM
To: Mark J Jacobs, PE, PTO
Subject: FW: Mor Furniture TIA - Low scale residential densities

Good afternoon, Mark.

Agreed, I understand they are not expecting a full blown TIA. Consistent with that end, the preliminary "MorFurnitureStorage-Tacoma-Technical-email.pdf" (attached) you produced proposes to compare potential ADT between future SFR development and other future commercial development options.

I believe what Nolan was indicating is that the "MorFurnitureStorage-Tacoma-Technical-email.pdf" table is comparing the potential future development of 4 DUs (ITE LUC 220; 4-units) to other potential future commercial development. Although 4-units on this site may be a possibility, due to a number of factors, if this site was developed residentially it is likely to be developed with more than 4 DUs. In fact, according to City policies (see excerpt Nolan provided; attached) this site should accommodate 10 to 25 DUs/acre. At 1.24 acres, that's 12 -to- 31 DUs for this site. Given the City's directive of 10 to 25 DUs and including a reduction for access, could you please simply add two more residential scenarios to compare to? The second at **(ITE LUC 220; 10-units)**; and, the third at **(ITE LUC 220; 20-units)**?

Best regards,
Scott Clark
Principal Planner
Secretary
Office: 253-474-3404
Cell: 253-625-3340

From: Mark J Jacobs, PE, PTO <JakeTraffic@comcast.net>
Sent: Friday, November 18, 2022 4:55 PM
To: 'Nolan, Adam' <ANolan@cityoftacoma.org>; Scott Clark <SClark@rrlarson.com>
Cc: 'Kammerzell, Jennifer' <JKammerzell@cityoftacoma.org>
Subject: RE: Mor Furniture TIA - Low scale residential densities

Nolan

I am not conducting a TIA, I am providing Trip Generation informnation for the site.

Thank you

Mark

From: Nolan, Adam [mailto:ANolan@cityoftacoma.org]
Sent: Friday, November 18, 2022 1:39 PM
To: Scott Clark
Cc: Kammerzell, Jennifer; Mark J Jacobs, PE, PTO
Subject: Mor Furniture TIA - Low scale residential densities

Hello Scott,

I am following up on our conversation earlier today concerning the TIA that Mark Jacobs is working on for the Mor Furniture land use designation change amendment application. See the attached document from the "Urban Form" chapter of the One Tacoma Comprehensive Plan. Note that for Low-Scale Residential, the target development density is 10-25 dwelling units/net acre.

This information can also be found on page 8 here:
chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://cms.cityoftacoma.org/Planning/OneTacomaPlan/1-2UrbanForm.pdf

Please reach out if you have any other questions.

Thanks,
Adam

Adam Nolan *(he/him)*
Associate Planner, Long-Range Planning
Planning & Development Services, City of Tacoma
747 Market Street, Room 345
Tacoma, WA 98402
(253) 320-8119
Take our survey!

WSDOT

Search | Portal FAQs | Feedback

Report Category	Report Name
Summary Reports	Total Crashes

Select Report Parameters

Report Year	Location		Jurisiction
2021	Region:	(All)	(All)
	County:	(All)	
	City:	Tacoma	

Run Report

Summary Reports - Total Crashes

Report Year: 2021
Location: City of Tacoma
Jurisdiction: (All)

Under 23 U.S. Code 148 and 23 U.S. Code 407, safety data, reports, surveys, schedules, list complied or collected for the purpose of identifying, evaluating, or planning the safety enhancement of potential crash sites, hazardous roadway conditions, or railway-highway crossings are not subject to discovery or admitted into evidence in a Federal or State court proceeding or considered for other purposes in any action for damages arising from any occurrence at a location mentioned or addressed in such report, surveys, schedules, lists, or data.

Data | Charts | Notes

Most Severe Injury per Crash	Crashes
Fatal	23
Suspected Serious Injury	103
Suspected Minor Injury	360
Possible Injury	1,045
No Apparent Injury	3,438
Total Crashes	4,969

WSDOT

Search | Portal FAQs | Feedback

Report Category	Report Name
Summary Reports	Total Crashes

Select Report Parameters

Report Year	Location		Jurisiction
2020	Region:	(All)	(All)
	County:	(All)	
	City:	Tacoma	

Run Report

Summary Reports - Total Crashes

Report Year: 2020
Location: City of Tacoma
Jurisdiction: (All)

Under 23 U.S. Code 148 and 23 U.S. Code 407, safety data, reports, surveys, schedules, list complied or collected for the purpose of identifying, evaluating, or planning the safety enhancement of potential crash sites, hazardous roadway conditions, or railway-highway crossings are not subject to discovery or admitted into evidence in a Federal or State court proceeding or considered for other purposes in any action for damages arising from any occurrence at a location mentioned or addressed in such report, surveys, schedules, lists, or data.

Data | Charts | Notes

Most Severe Injury per Crash	Crashes
Fatal	19
Suspected Serious Injury	71
Suspected Minor Injury	262
Possible Injury	892
No Apparent Injury	2,649
Total Crashes	3,893

WSDOT

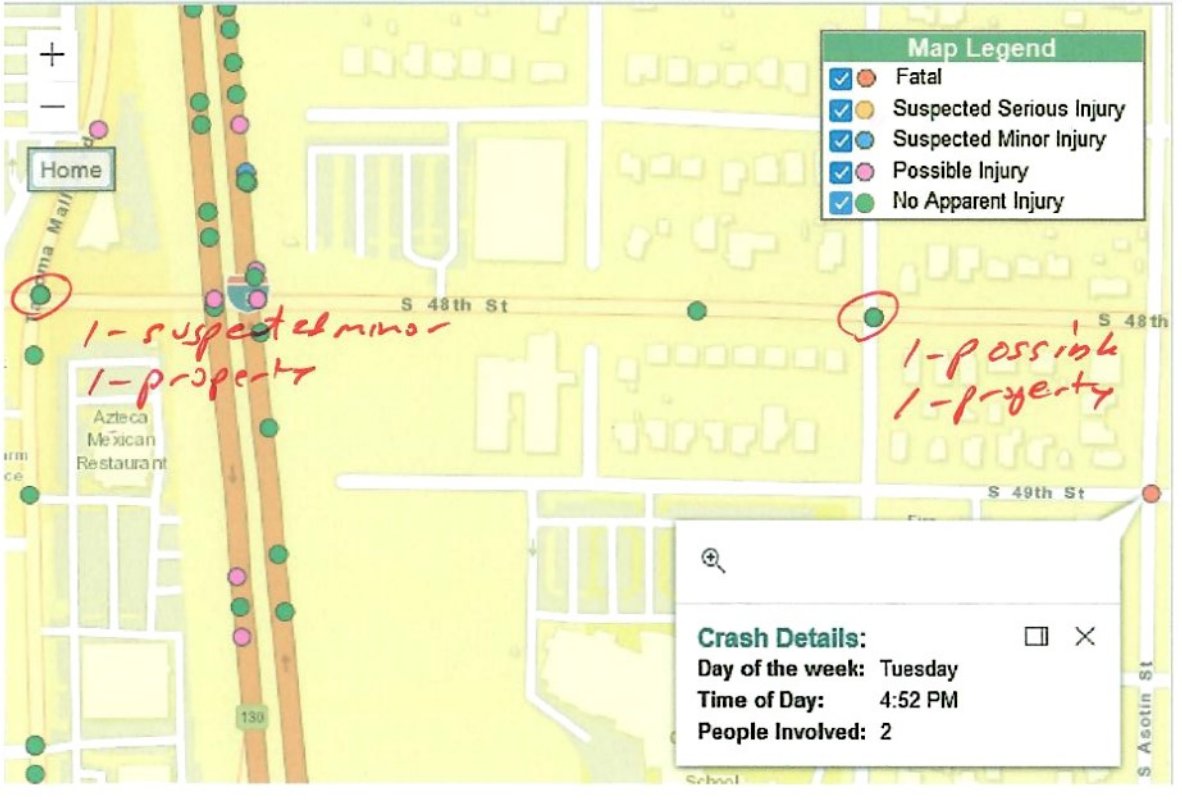
Search | Portal FAQs | Feedback

Report Category	Report Name
Summary Reports	Total Crashes

Select Report Parameters

Report Year	Location		Jurisiction
2019	Region:	(All)	(All)
	County:	(All)	
	City:	Tacoma	

Run Report



Summary Reports - Total Crashes

Report Year: 2019
Location: City of Tacoma
Jurisdiction: (All)

Under 23 U.S. Code 148 and 23 U.S. Code 407, safety data, reports, surveys, schedules, list complied or collected for the purpose of identifying, evaluating, or planning the safety enhancement of potential crash sites, hazardous roadway conditions, or railway-highway crossings are not subject to discovery or admitted into evidence in a Federal or State court proceeding or considered for other purposes in any action for damages arising from any occurrence at a location mentioned or addressed in such report, surveys, schedules, lists, or data.

Data | Charts | Notes

Most Severe Injury per Crash	Crashes
Fatal	18
Suspected Serious Injury	75
Suspected Minor Injury	297
Possible Injury	1,084
No Apparent Injury	3,264
Total Crashes	4,738

WSDOT

Search | Portal FAQs | Feedback

Report Category	Report Name
Summary Reports	Total Crashes

Select Report Parameters

Report Year	Location		Jurisiction
2018	Region:	(All)	(All)
	County:	(All)	
	City:	Tacoma	

Run Report

Summary Reports - Total Crashes

Report Year: 2018
Location: City of Tacoma
Jurisdiction: (All)

Under 23 U.S. Code 148 and 23 U.S. Code 407, safety data, reports, surveys, schedules, list complied or collected for the purpose of identifying, evaluating, or planning the safety enhancement of potential crash sites, hazardous roadway conditions, or railway-highway crossings are not subject to discovery or admitted into evidence in a Federal or State court proceeding or considered for other purposes in any action for damages arising from any occurrence at a location mentioned or addressed in such report, surveys, schedules, lists, or data.

Data | Charts | Notes

Most Severe Injury per Crash	Crashes
Fatal	15
Suspected Serious Injury	77
Suspected Minor Injury	337
Possible Injury	1,148
No Apparent Injury	3,643
Total Crashes	5,220

WSDOT

Search | Portal FAQs | Feedback

Report Category	Report Name
Summary Reports	Total Crashes

Select Report Parameters

Report Year	Location		Jurisiction
2017	Region:	(All)	(All)
	County:	(All)	
	City:	Tacoma	

Run Report

Summary Reports - Total Crashes

Report Year: 2017
Location: City of Tacoma
Jurisdiction: (All)

Under 23 U.S. Code 148 and 23 U.S. Code 407, safety data, reports, surveys, schedules, list complied or collected for the purpose of identifying, evaluating, or planning the safety enhancement of potential crash sites, hazardous roadway conditions, or railway-highway crossings are not subject to discovery or admitted into evidence in a Federal or State court proceeding or considered for other purposes in any action for damages arising from any occurrence at a location mentioned or addressed in such report, surveys, schedules, lists, or data.

Data | Charts | Notes

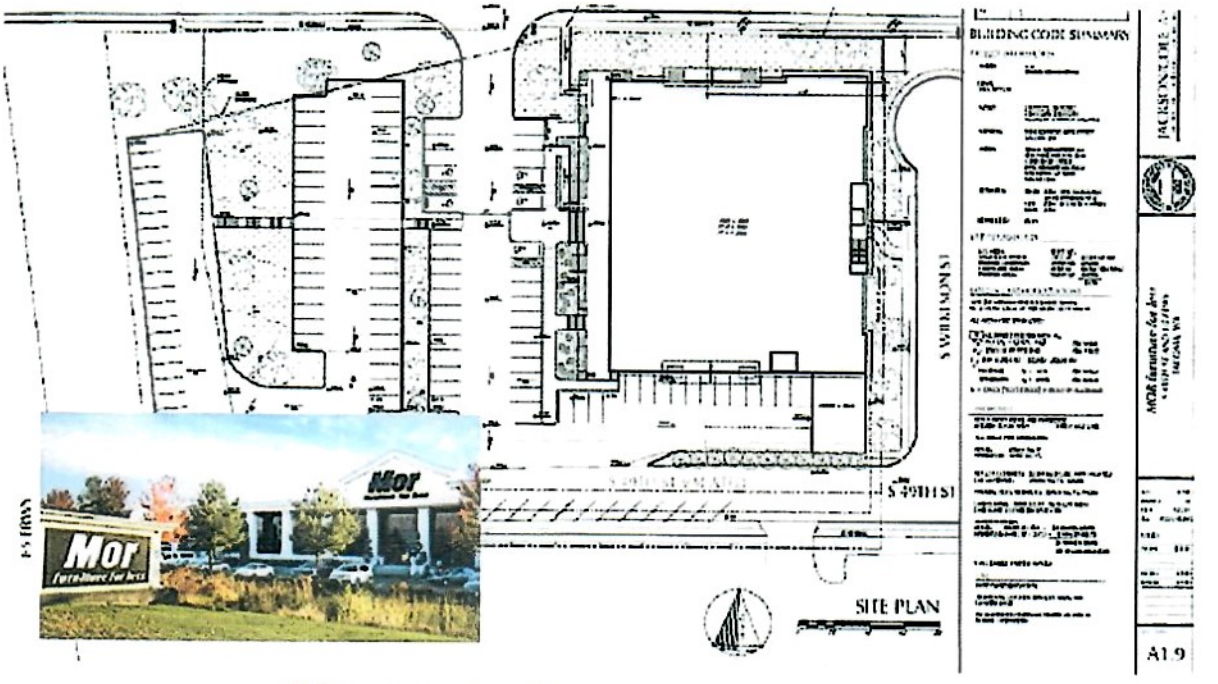
Most Severe Injury per Crash	Crashes
Fatal	12
Suspected Serious Injury	85
Suspected Minor Injury	343
Possible Injury	1,160
No Apparent Injury	3,675
Total Crashes	5,275

pertinent pages

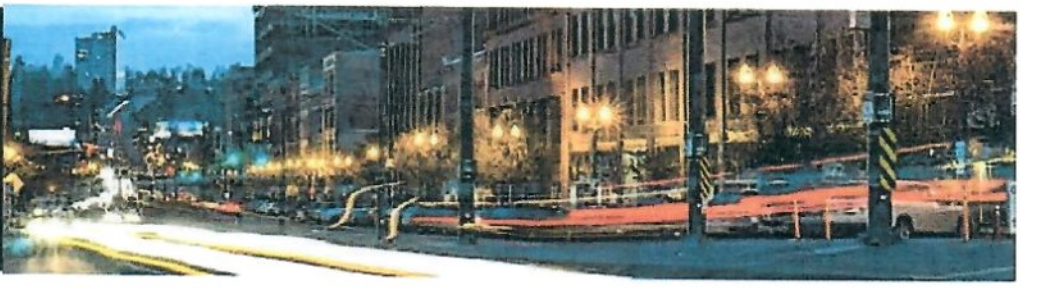
Tacoma

SOUTH 48TH STREET MOR FURNITURE TRAFFIC IMPACT ANALYSIS

February 3, 2014



JTE . Jake Traffic Engineering, Inc.
Mark J. Jacobs, PE, PTOE, President
2614 39th Ave SW – Seattle, WA 98116 – 2503
Tel. 206.762.1978 - Cell 206.799.5692
E-mail jaketraffic@comcast.net



JTE . Jake Traffic Engineering, Inc. .

Mark J. Jacobs, PE, PTOE
President
2614 39th Ave. SW – Seattle, WA 98116 – 2503
Tel. 206.762.1978 - Cell 206.799.5692
E-mail jaketraffic@comcast.net

February 3, 2014

Michael Zeller, Director of Facilities
MOR FURNITURE FOR LESS, INC.
8996 Miramar Rd. Ste 300
San Diego, CA 92126

Re: S. 48th St. Mor Furniture – Tacoma
Traffic Impact Analysis

Dear Mr. Zeller,

I am pleased to present this Traffic Impact Analysis for a proposed 44,990 sf Mor Furniture store on the south side of S. 48th St. just east of SR – 5 in Tacoma. Primary access to the site is proposed via a driveway on S. 48th St. aligned with the Macy Furniture Store access on the north side of the street.

Correspondence with the City of Tacoma staff identified that the following intersections be studied in this report

1. S. 48th St./Tacoma Mall Boulevard
2. S. 48th St./Lacey's Furniture Store driveway
3. S. 48th St./S. Alaska St.

The City also requested the following items be incorporated into the traffic report.

- *The proposed driveway access onto South 48th and its on-site circulation and connection with the residential roadway of South 49th on the south side of the site will need to be assessed for potential neighborhood/school cut-through potential.*
- *Please indicate the likely truck delivery entry/exit routes and access to/from the site, especially with respect to the above cut-through scenario (i.e., likely sensitivity of the surrounding neighborhood)*
- *In your discussion of the proposed operation/channelization of the center lane/median, please include operations, queue expectations, two-stage left-turn impacts, etc. in addition to any proposed re-channelization (diagrammatic is fine) that would be implemented by the developer to facilitate their desired access plan*
- *Your discussion of trip generation for the site should consider the likelihood that a Saturday afternoon is probably its peak demand (as would be for the Macy's driveway on the north)– therefore, you may be able to perform a quick supplemental analysis of opening year conditions for an *estimated* Saturday afternoon scenario (approximation of Saturday demand on 48th is acceptable using, or basing from, the weekday PM peak period).*

I have field reviewed the site and surrounding street system. The general format of this report is to describe the proposed project, identify existing traffic conditions (baseline), project future traffic conditions and identify Agency street/road improvements (future

The SSD was measured to a 2 ft. high object "vehicle tail light" standards. The 2 ft. object height is per the American Association of State Highway and Transportation Officials (AASHTO).

The results of the field measurements are summarized in Table 2. Table 2 shows the stopping and entering sight distance standards per the identified MPH at the proposed access. The stopping and entering sight distance were obtained from the American Association of State Highway and Transportation Officials (AASHTO) A Policy on Geometric Design of Highways an Streets, 2001 Fourth Edition "Exhibit 3-1. Stopping sight distance wet pavement" and "Exhibit 9-55. Design Intersection Sight Distance – Case B1 – Left Turn from stop".

South 48th Street has a posted 30 MPH speed limit that correlates into a 35 MPH design speed per City criteria. The proposed access on S. 48th Street is aligned with the existing Macy Furniture Store access and has sufficient sight lines for a 35 MPH design speed. Further no safety issue is noted at the existing Macy Access.

AGENCY TRAFFIC IMPACT MITIGATION REQUIREMENTS

The City will require that the project site access and circulation be constructed in conformance to City requirements.

SUMMARY, CONCLUSIONS AND RECOMMENDATIONS

This report analyzed the traffic and parking impact of the proposed S. 48th St. Mor Furniture located on the south side of S. 48th Street just east of SR - 5. The proposed project is a 44,990 sf Mor Furniture Access with primary access on S. 48th Street aligned with the Macy Access.

Existing traffic data was obtained at the street intersections identified for analysis. Future horizon year traffic volumes were derived using a growth factor of 2 percent per year. Level of service analyses were performed for existing and projected future horizon traffic volumes during the weekday PM peak hour. The evaluation of the traffic impact of the proposed project included adding project generated traffic (Saturday peak hour traffic used to ensure a conservative review) to the future traffic volume projections and calculating the level of service. The "with" project traffic operations were then compared to the "without" project operations. The comparison of traffic operations "with" and "without" the project identified that the project would not cause a significant adverse affect on the operation of the study intersections. In addition, sight lines and safety inspection were conducted at the study intersections and no apparent deficiencies were noted.

Based on my analysis I recommend that S. 48th St. Mor Furniture be allowed with the following traffic impact mitigation measures.

- Construct site in accordance with applicable City requirements.

If you have any questions you can contact me at 206.762.1978 or email me at jaketraffic@comcast.com.

MARK J. JACOBS
STATE OF WASHINGTON
25744
REGISTERED
PROFESSIONAL ENGINEER

Very truly yours,

Mark J. Jacobs, PE, PTOE, President
JAKE TRAFFIC ENGINEERING, INC.

02.03.2014

MJJ: mjj

EXPIRES 4/3/2014

PM PEAK HOUR LEVEL OF SERVICE

TABLE 1

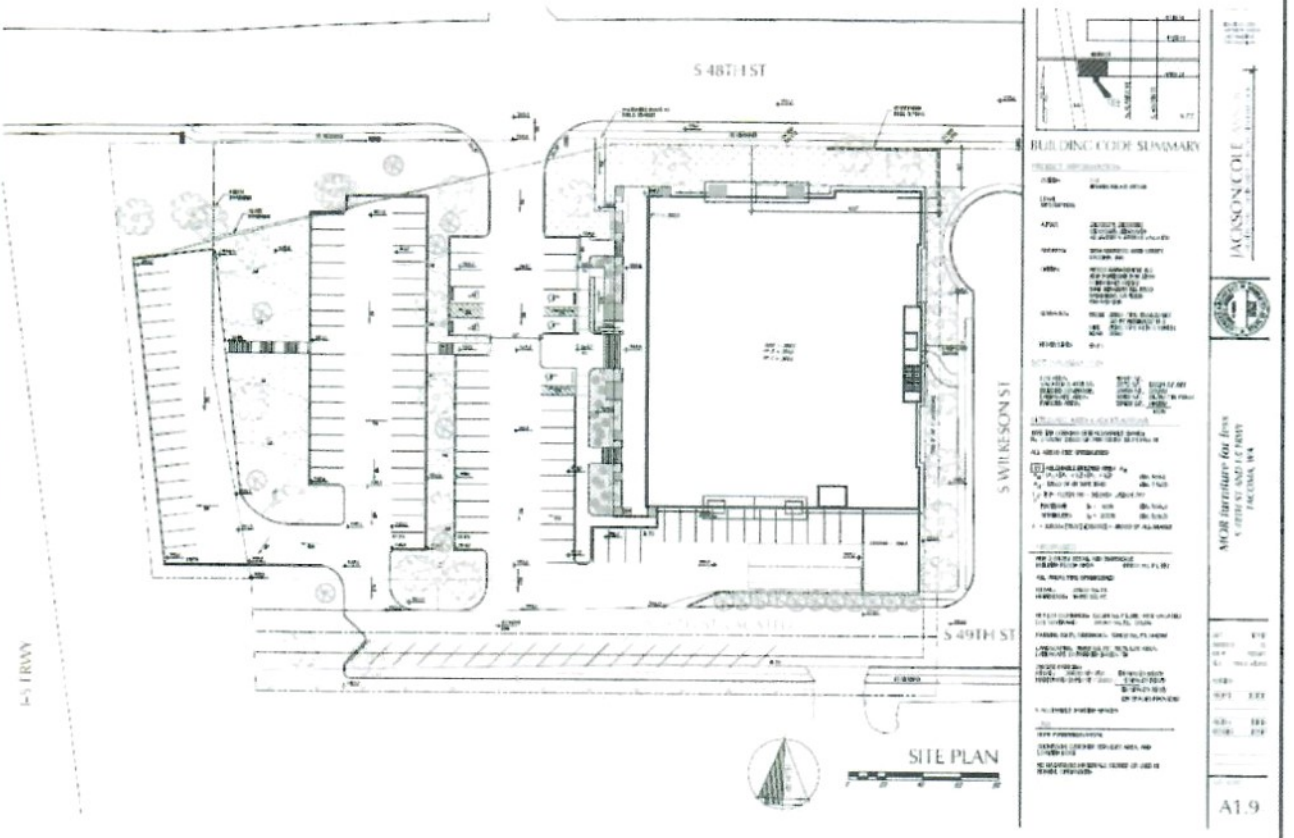
S. 48TH ST. MOR FURNITURE – TACOMA
TRAFFIC IMPACT ANALYSIS

INTERSECTION	APPROACH	EXISTING	2018 W/O PROJECT	2019 W/ PROJECT
1. S. 48th St./Tacoma Mall Boulevard	Overall	C (30.2)	C (32.5)	C (32.8)
2. S. 48th St./Macy's – Mor (future) access	SB EBLT NB WBLT	B (11.2) A (8.4) – –	B (11.4) A (8.6) – –	B (14.8) A (9.1) C (20.6) A (8.6) *Note: Saturday peak turning traffic used*
3. S. 48th St./S. Alaska St.	Overall	C (23.9)	C (24.3)	C (24.4)

Number shown in parenthesis is the average control delay in seconds per vehicle for the intersection as a whole or approach movement, which determines the LOS per the Highway Capacity Manual.

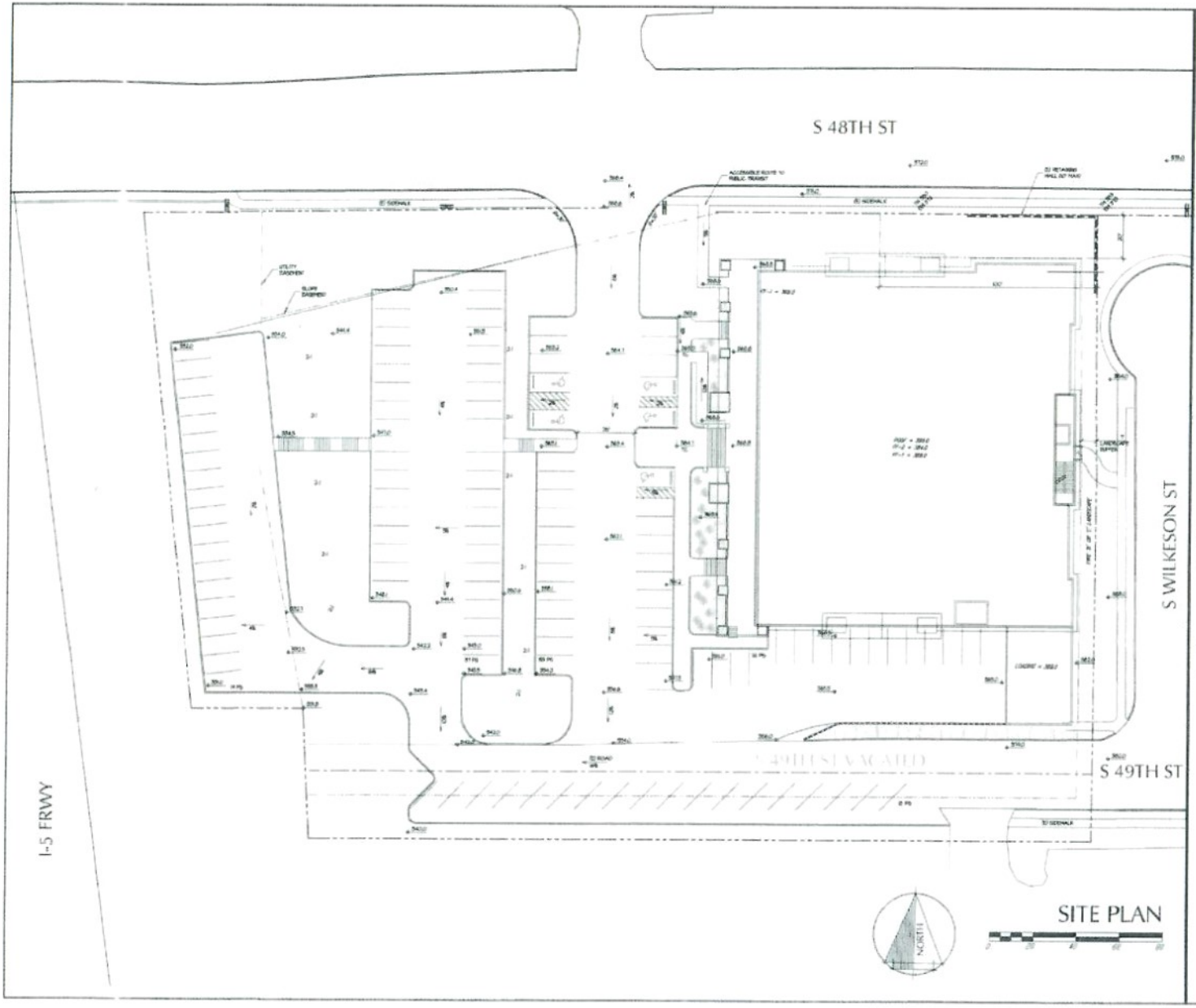
Project: S. 48th St. Mor Furniture – Tacoma
Location: South side of S. 48th St. e/o SR - 5

NORTH



Note: An 8.5 x 11" copy of the Site Plan is included with this report

JTE, Inc. FIGURE 2 **Reprint in Color Only**	S. 48TH ST. MOR FURNITURE – TACOMA TRAFFIC IMPACT ANALYSIS
	SITE PLAN



BUILDING CODE SUMMARY

PROJECT INFORMATION

ZONING: C-2 NEIGHBORHOOD RETAIL

LEGAL DESCRIPTION:

APNS: 2100027, 2100070, 2100028, 2100029 ADJACENT S 49TH ST VACATED

ADDRESS: NEW ADDRESS/ 49TH STREET TACOMA, WA

OWNER: RESCO MANAGEMENT LLC NOR FURNITURE FOR LESS CORPORATE OFFICE 5790 MIRAMAR RD. #500 SAN DIEGO, CA 92121 858-547-1858

SETBACKS: FRONT: 25'(0) (TYP. 15.06.200.C2) 20-FT BETWEEN 100' R-2 SIDE: 25'(0) 1-FT AT 0-2 STREET REAR: 25'(0)

HEIGHT LIMIT: 45-FT

SITE INFORMATION

LOT AREA:	181441 S.F.	
VACATED S 49TH ST	27712 S.F.	(22.2%) S.F. NET
BUILDING COVERAGE	25650 S.F.	(20.6%)
LANDSCAPE AREA:	3655 S.F.	(2.9%) (7% PROJ)
PARKING AREA:	59405 S.F.	(47.5%)
		100%

BUILDING AREA CALCULATIONS

TYPE IIIB CONSTRUCTION ALLOWABLE (BASE)
H - 2 STORY, 12500 S.F. PER STORY, 55 FT HIGH (F)

ALL AREAS FIRE SPRINKLERED

(F) ALLOWABLE BUILDING AREA A_a
$A_a = [A_t + (A_t \times I_f) + (A_t \times I_s)]$ (TBL 506.2)
A_t = 12500 SF (H TYPE IIIB) (TBL 506)
I_f (FF) = 0.25(H-50) + (S)(0.5) = 0.25(24-50)
FRONTAGE I_f = 0.25 (TBL 506.3)
SPRINKLERED I_s = 2.00 (TBL 506.3)
A = 12500+[(0.25)(-26)(0.5)] = 45000 SF ALLOWABLE

PROPOSED

NEW 2-STORY RETAIL AND WAREHOUSE
BUILDING FLOOR AREA 44900 SQ. FT. NET

ALL AREAS FIRE SPRINKLERED

RETAIL: 38500 SQ. FT.
WAREHOUSE: 6400 SQ. FT.

44,900

NET LOT (COMBINED): 122214 SQ. FT. (INC. 49TH VACATED)
LOT COVERAGE: 25650 SQ. FT. (20.9%)

PARKING (SUES, SIDEWALKS): 59405 SQ. FT. (48.5%)

LANDSCAPING: 3655 SQ. FT. (6.1% LOT AREA)
LANDSCAPE TO PARKING RATIO: 7%

ON-SITE PARKING:
RETAIL: 38500 SF / 250 = 154 SPACES REQ'D
WAREHOUSE: 6400 SF / 2000 = 4 SPACES REQ'D
(9 SPACES REQ'D)
(25 SPACES PROVIDED)

1 ACCESSIBLE PARKING SPACES

USE

HOME FURNISHINGS, RETAIL

SHOWROOM, CUSTOMER SERVICES AREA, AND LOADING DOCK

NO HAZARDOUS MATERIALS STORED OR USED IN NORMAL OPERATIONS

JACKSON/COLE ARCHITECTS

MOR furniture for less
S 48TH ST AND I-5 FRWY
TACOMA, WA

DATE
DRAWN BY
JOB #
FILE
REVISIONS
REVISION 1
REVISION 2
REVISION 3

A1.9

NORTH

LEGEND

Approach Lane & Direction

Stop Sign

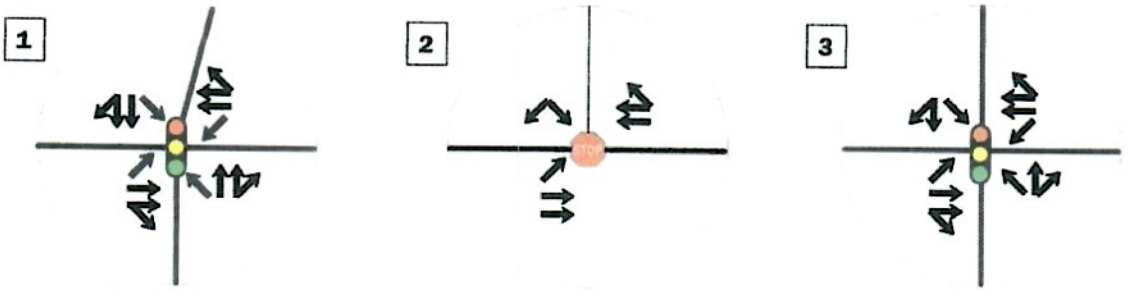
Traffic Signal

x Analysis I/S #

X-L's # of Travel Lanes

XX MPH Posted Speed Limit

Image obtained from Pierce County Public GIS



S. 48th St. at Tacoma Mall Blvd

S. 48th St. at Macy's Driveway

S. 48th St. at S. Alaska St.

JTE, Inc.

FIGURE 3

Reprint in Color Only

S. 48TH STREET MOR FURNITURE - TACOMA
TRAFFIC IMPACT ANALYSIS

EXISTING STREET CONDITIONS

NORTH

LEGEND

PM Peak Hour Trip & Direction

Stop Sign

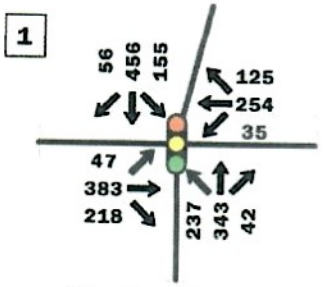
Traffic Signal

x Analysis I/S #

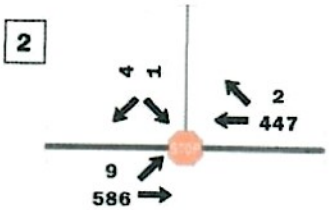
X-L's # of Travel Lanes

XX MPH Posted Speed Limit

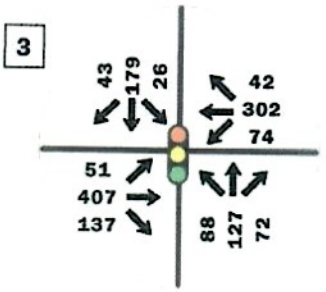
Image obtained from Pierce County Public GIS



Thursday 01.16.2014
1600-1700



Thursday 01.16.2014
1700-1800



Thursday 01.16.2014
1615-1715

JTE, Inc.

FIGURE 4

Reprint in Color Only

S. 48TH STREET MOR FURNITURE - TACOMA
TRAFFIC IMPACT ANALYSIS

EXISTING PM PEAK HOUR TRAFFIC

NORTH

LEGEND

PM Peak Hour Trip & Direction

Stop Sign

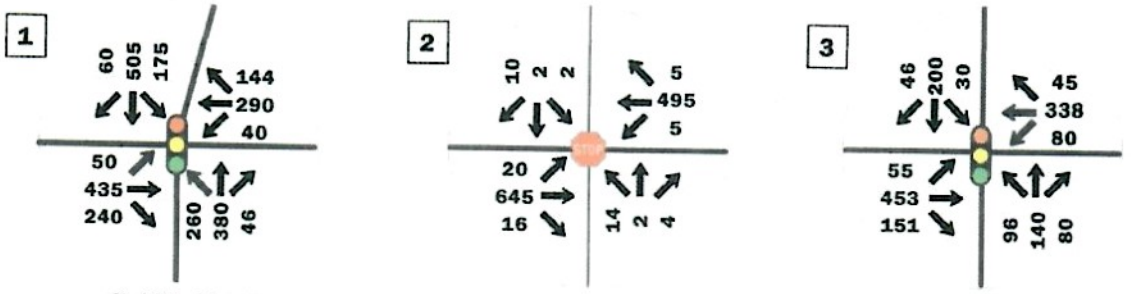
Traffic Signal

x Analysis I/S #

X-L's # of Travel Lanes

XX MPH Posted Speed Limit

Image obtained from Pierce County Public GIS



S. 48th St. at Tacoma Mall Blvd

S. 48th St. at Mor/Macy Access

S. 48th St. at S. Alaska St.

* - Saturday peak turning movement shown

JTE, Inc.

FIGURE 7

Reprint in Color Only

S. 48TH STREET MOR FURNITURE - TACOMA
TRAFFIC IMPACT ANALYSIS

PROJECTED 2019 PM PEAK HOUR TRAFFIC VOLUMES
WITH THE PROJECT

Tacoma Economic Goals

Comprehensive Plan Economic Goals Consistency Review
Mor Furniture Land Use Designation Amendment

City of Tacoma GOAL EC–1: Diversify and expand Tacoma's economic base to create a robust economy that offers Tacomans a wide range of employment opportunities, goods and services.

> CONSISTENT: Approval of the Mor Furniture Land Use Designation change to Commercial will expand Tacoma's economic base by promoting additional economic development opportunities that offer Tacomans additional employment opportunities, as well as additional access to furniture goods and services.

GOAL EC–2: Increase access to employment opportunities in Tacoma and equip Tacomans with the education and skills needed to attain high-quality, living wage jobs.

> CONSISTENT: Approval of the Mor Furniture Land Use Designation change will increase access to commercial employment opportunities in Tacoma. Mor Furniture provides in-house employee training/education that encourages skill development promoting high-quality, living wage jobs for Tacomans.

GOAL EC–3: Cultivate a business culture that allows existing establishments to grow in place, draws new firms to Tacoma and encourages more homegrown enterprises.

> CONSISTENT: The approval of the Mor Furniture Land Use Designation change to Commercial is responsive to the business community, which directly fosters and cultivates a business culture that the City wants business to grow in place. Approval will allow Mor Furniture to grow in place and expand on their initial vision, which is an encouragement to other entrepreneurial enterprises and new businesses wishing to locate in Tacoma.

GOAL EC–4: Foster a positive business environment within the City and proactively invest in transportation, infrastructure and utilities to grow Tacoma's economic base in target areas.

> CONSISTENT: Being responsive to the business community on requests like this fosters a positive business environment within the City. The approval of the Mor Furniture Land Use Designation change will directly support new commercial development in an undeveloped area of the City that is directly abutting the Commercially zoned Mor property.

GOAL EC–5: Create a city brand and image that supports economic growth and leverages existing cultural, community and economic assets.

CONSISTENT: Approval of the Mor Furniture Land Use Designation change to Commercial will expand Tacoma's economic base, which will be consistent with the City's efforts in establishing a City brand and image that is supportive of economic growth. Approval of this request will leverage the existing economic assets of the immediate area, which in this case includes the Tacoma Mall commercial retail area that is physically connected to commercial retail activities along South 48th Street immediately east of I-5.

GOAL EC–6: Create robust, thriving employment centers and strengthen and protect Tacoma's role as a regional center for industry and commerce.

CONSISTENT: Approval of the Mor Furniture Land Use Designation change to Commercial will strengthen the Tacoma Mall employment center. Approval will allow development that supports the needs of Mor Furniture, which is consistent with the City's efforts to retain, grow and attract business within the Tacoma Mall regional business center.

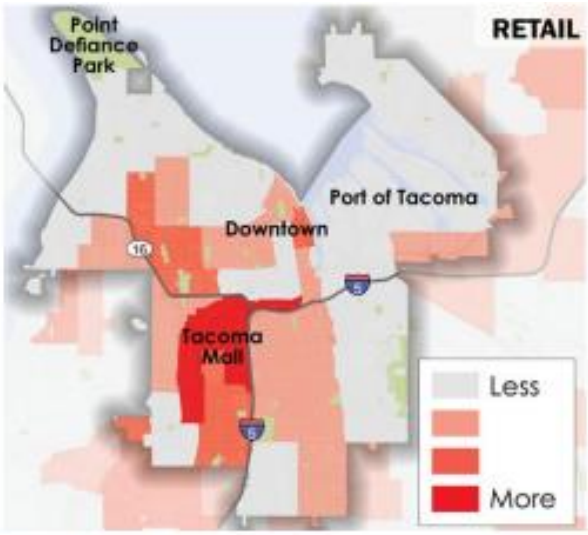


FIGURE 27. Employment Concentration by Major Industry, City of Tacoma, 2013

The above maps illustrate the relative concentrations of employment by industry within Tacoma. The darker the color, the more concentrated employment is in that particular industry.

Source: Puget Sound Regional Council, 2014