

Preliminary Determination of Environmental Nonsignificance





City of Tacoma
**Preliminary Determination of
Environmental Nonsignificance**

**2023 Annual Amendment
to the One Tacoma Comprehensive Plan and Land Use Regulatory Code**

SEPA File Number: LU23-0040

TO: All Departments and Agencies with Jurisdiction

SUBJECT: Preliminary Determination of Environmental Nonsignificance

In accordance with WAC 197-11-340, a copy of the Preliminary Determination of Environmental Nonsignificance for the project described below is transmitted:

Applicant: City of Tacoma
Planning and Development Services Department
747 Market Street, Room 345
Tacoma, WA 98402

Proposal:

2023 Annual Amendment to the One Tacoma Comprehensive Plan and the Land Use Regulatory Code (2023 Amendment), which includes the following six applications (or subjects):

- (1) Mor Furniture Land Use Designation Change
- (2) Electric Fences
- (3) Shipping Containers
- (4) Delivery-Only Retail Businesses
- (5) Commercial Zoning Update Phase I: Neighborhood Commercial Design Standards
- (6) Minor Plan and Code Amendments

The complete text of the proposed amendments and the associated staff analysis reports are available for review on the website at www.cityoftacoma.org/2023Amendment. Hard copies are available by request at the Permit Counter, 747 Market Street, 3rd Floor, Tacoma, WA 98402.

Location: City of Tacoma

Lead Agency: City of Tacoma

City Contact: Adam Nolan
Planning and Development Services Department
747 Market Street, Room 345
Tacoma, WA 98402
(253) 320-8119 or anolan@cityoftacoma.org

The lead agency for this proposal has made a preliminary determination that this project does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030 (2) (c). This decision was made after review of an environmental checklist and other information on file with the lead agency. This information is available to the public upon request. This Preliminary Determination of Nonsignificance (DNS) is issued under WAC 197-11-340(2). **Comments must be submitted by 5:00 p.m. on April 7, 2023.** The Responsible Official will

reconsider the DNS based on timely comments and may retain, modify, or, if significant adverse impacts are likely, withdraw the DNS. **Unless modified by the City, this determination will become final on April 14, 2023.** There is no administrative appeal for this determination. Appeals must be filed in conjunction with appeals of the adopted amendments to the Growth Management Hearings Board; appeals shall be taken in accordance with procedures and limitations set forth in RCW 43.21C.075 and WAC 242-02. In addition to Growth Management Hearings Board requirements, a copy of the appeal shall be filed with the Planning and Development Services Department, 747 Market Street, Room 345, Tacoma, Washington 98402.

The Puyallup Tribe is notified that this initiates the consultation process.

Responsible Official: Peter Huffman
Position/Title: Director, Planning and Development Services Department

Signature:  (Peter Huffman)

SEPA Officer Signature:  (Shirley Schultz)

Issue Date: March 14, 2023
Comment Deadline: April 7, 2023, 5:00 p.m.

NOTE: The issuance of this Preliminary DNS does not constitute project approval. Future project applicants must comply with all other applicable requirements of the City of Tacoma and other agencies with jurisdiction prior to receiving development permits.

c:

Puyallup Tribe of Indians; SEPARewiew@PuyallupTribe-nsn.gov
Washington State Dept. of Fish and Wildlife; R6SSplanning@dfw.wa.gov
Washington State Dept. of Ecology; seperegister@ecy.wa.gov, evba461@ecy.wa.gov
Port of Tacoma; twarfield@portoftacoma.com
Washington State Dept. of Archaeology and Historic Preservation; sepa@dahp.wa.gov
Sound Transit; perry.weinberg@soundtransit.org, steven.kennedy@soundtransit.org
Tacoma-Pierce County Health Department; SEPA@tpchd.org, ccooley@tpchd.org
Puget Sound Clean Air Agency; SEPA@pscleanair.org
Pierce Transit; tvaslet@piercetransit.org
Tacoma Public Schools; cwillia4@tacomak12.wa.us, planning@tacoma.k12.wa.us
City of Federal Way; PlngInquiry@cityoffederalway.com, Brian.Davis@cityoffederalway.com;
planning@cityoffederalway.com
City of Fife; clarson@cityoffife.org
City of Fircrest; astahlnecker@cityoffircrest.net
City of Lakewood; FFiori@cityoflakewood.us
City of Ruston; robw@rustonwa.org
City of University Place; dswindale@cityofup.com
Pierce County; lhankel@co.pierce.wa.us
Pierce County Assessor-Treasurer; dbrandv@co.pierce.wa.us

File: Planning and Development Services

SEPA ENVIRONMENTAL CHECKLIST

SEPA File Number: LU23-0040

A. BACKGROUND

1. Name of proposed project, if applicable:

2023 Annual Amendment to the One Tacoma Comprehensive Plan and the Land Use Regulatory Code (2023 Amendment), which includes the following six applications (or subjects):

- (1) Mor Furniture Land Use Designation Change
- (2) Electric Fences
- (3) Shipping Containers
- (4) Delivery-Only Retail Businesses
- (5) Commercial Zoning Update Phase I: Neighborhood Commercial Design Standards
- (6) Minor Plan and Code Amendments

2. Proponent/applicant:

City of Tacoma
Planning and Development Services Department
747 Market Street, Room 345
Tacoma, WA 98402-3701

3. Contact:

Adam Nolan
Planning and Development Services Department
747 Market Street, Room 345
Tacoma, WA 98402-3701
Phone: (253) 320-8119
E-mail: anolan@cityoftacoma.org

4. Date checklist prepared:

March 3, 2023

5. Agency requesting checklist:

City of Tacoma, Planning and Development Services Department

6. Proposed timing or schedule (including phasing, if applicable):

Timeline	Activity
January – March 2022	Applications accepted (submittal deadline March 31, 2022)
May – September 2022	Assessment of applications by the Planning Commission
July 2022 – March 2023	Technical analysis of applications by the Planning Commission and planning staff, including community outreach and engagement
April 5, 2023	Planning Commission Public Hearing
April – May 2023	Planning Commission making recommendations to the City Council
May – June 2023	City Council review and adoption

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

The One Tacoma Comprehensive Plan and the Land Use Regulatory Code are amended on an annual basis consistent with the State Growth Management Act (GMA). The proposed changes to the text, maps and policies of the One Tacoma Plan will apply to future land use and development. Proposed changes to the Land Use Regulatory Code and the Official Zoning Map will provide the basis to evaluate and regulate future development proposals.

Concerning Subject #1, Mor Furniture Land Use Designation Change (hereinafter referred to as Mor Furniture), the proposed General Commercial land use designation would allow the subject parcel, with appropriate site rezone, to accommodate future development of a vacant, undeveloped parcel adjacent to planned commercial furniture store (a general commercial use). Impacts resulting from future project-specific development proposals would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code.

Concerning Subject #2, Electric Fences, if the code changes are approved business owners will be able to apply for and construct electric fences in the C-1 and C-2 Commercial Districts, as well as CIX Mixed Use Industrial District and the WR Warehouse Residential District.

Concerning Subject #3, Shipping Containers, if the code changes are approved shipping containers could be placed on sites in the C-1 and C-2 Commercial Districts, as well as on sites in residential districts that operate under an approved Conditional Use Permit. Certain sizes of shipping containers would need a building permit.

Concerning Subject #4, Regulating Delivery-Only Businesses of Food and Other Consumables (hereinafter referred to as Delivery-only retail businesses), staff proposes to address delivery-only retail businesses as commissary kitchen use, and add commissary kitchens as a subset of "Retail" uses in the Tacoma Municipal Code land use tables. This would mean that commissary kitchens are no longer an unlisted use and would be required to meet "Retail" use and development standards (parking, loading, etc.). Additional regulations would add size limitations for commissary kitchens in mixed-use districts and a requirement for an in-person, direct-to-customer sale component for retail establishments located on a designated pedestrian street. These measures would add clarity around delivery-only retail businesses use and standards in Tacoma Municipal Code that would apply to potential future activity related to this use.

Concerning Subject #5, Commercial Zoning Update Phase I: Neighborhood Commercial Design Standards (hereinafter referred to as Commercial Zoning Update), staff proposes a City-wide update to our commercial zoning code. Phase I, being implemented as part of the 2023 amendment package, is limited in scope to updates deemed appropriate prior to the expansion of the multi-family tax exemption (MFTE) program to neighborhood commercial nodes. Phase 2, as part of the 2024 Periodic Comprehensive Plan update, will further assess necessary code updates to commercial areas throughout the City. Phase I updates focus on clarifying the applicability of existing standards to more clearly articulate which standards apply to single- and mixed-use multi-family development in the City's commercial zoning districts (C-1, C-2, PDB, T).

Concerning Subject #6, Minor Plan and Code Amendments, (hereinafter referred to as Minor Amendments), compiles seven minor and non-policy amendments to the One Tacoma Comprehensive Plan and the Land Use Regulatory Code. None of the seven amendments are connected with future additions, expansions, or further activity.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

In addition to this checklist for the 2023 Amendment, some environmental analyses have been conducted for Subject #1 (Mor Furniture) (Attachments A and B).

Similar SEPA analyses have also been prepared for all past annual amendments. Listed below are those for the last three years, with the rest on file and available for review upon request:

- 2022 Annual Amendment, SEPA #LU22-0041
- 2020 Annual Amendment, SEPA #LU20-0179
- 2019 Annual Amendment, SEPA #LU19-0068

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

Concerning Subject #1, Mor Furniture: the applicant Wesco Management, LLC provided preliminary development plans for the subject parcel and four Commercial zoned parcels bordering directly to the north; the subject parcel is also currently incorporated in the grading plan for the four adjoining Commercial zoned lots (SDEV17-0146). The preliminary development plans show the applicant's intention to develop a Mor Furniture store on the four Commercial zoned lots, and a Mor Outlet warehouse store on the subject site (pending land use change and site rezone).

10. List any government approvals or permits that will be needed for your proposal, if known.

The proposed amendments are subject to the following governmental approvals:

- Adoption by Tacoma City Council
- Verification of GMA compliance by Washington State Department of Commerce
- Plan Certification by Puget Sound Regional Council

Future development applications will be subject to the One Tacoma Plan, regulations, and zoning classifications and be approved through issuance of various permits and approvals as required.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site.

The 2023 Amendment includes six subjects, as described below. The complete text of the proposed amendments and the associated staff analysis reports are available for review on the website at www.cityoftacoma.org/2023Amendment.

Proposal (Subject)	Description (Scope of Work and Intent)
(1) Mor Furniture Land Use Designation Change	Wesco Management, LLC (parent company of Mor Furniture) requests for changing the Comprehensive Plan Land Use Designation for a 1.24-acre parcel from Low Scale Residential to General Commercial. The parcel is located directly to south of four currently undeveloped commercial-zoned parcels owned by the applicant and preliminarily planned to be the site of a Mor Furniture store. If granted, the General Commercial designation would enable Wesco Management to apply for a rezone to C-2 General Community Commercial Zoning District to allow for development complementary to the development plans for the applicant's commercial-zoned parcels to the north.

Proposal (Subject)	Description (Scope of Work and Intent)
(2) Electric Fences	This proposal would allow electric fences, subject to specific standards, in the C-1 and C-2 Commercial Districts, as well as the CIX Mixed Use Industrial District and the WR Warehouse Residential District. This is in addition to the M-1, M-2, and PMI Industrial Districts in which electric fences are already allowed. Except for the Industrial Districts, these districts allow a mixture of residential and commercial uses. The proposed code includes protections between electric fences and property lines, including a non-electric fence around the electric fence and increased setbacks.
(3) Shipping Containers	This proposal would allow shipping containers to be used as accessory structures on sites in the C-1 and C-2 Commercial Districts, as well as residentially zoned sites that are operating with a Conditional Use Permit. The placement of the shipping containers would be subject to certain standards, depending on where they are located and for how long.
(4) Delivery-Only Retail Businesses	This proposal would apply citywide in zoning districts allowing for retail commercial uses. Staff proposes to address delivery-only retail businesses as commissary kitchen use and add commissary kitchens as a subset of “Retail” uses in the Tacoma Municipal Code land use tables. This would mean that commissary kitchens are no longer an unlisted use and would be required to meet “Retail” use and development standards (parking, loading, etc.). Additional regulations would add size limitations for commissary kitchens in mixed-use districts and a requirement for an in-person, direct-to-customer sale component for retail establishments located on a designated pedestrian street. These measures would add clarity around delivery-only retail use and standards in Tacoma Municipal Code.
(5) Commercial Zoning Update Phase I: Neighborhood Commercial Design Standards	This update applies citywide in commercially zoned areas. The proposal is to update the City’s code as it relates to both single- and mixed-use multi-family development in the City’s commercially zoned districts. Updates largely consist of clarifications as to the applicability of existing standards.
(6) Minor Plan and Code Amendments	Proposed by the Planning and Development Services Department, this application compiles seven minor and non-policy amendments to the One Tacoma Comprehensive Plan and the Land Use Regulatory Code, intended to update information, correct errors, address inconsistencies, improve clarity, and enhance applicability of the plan and the code.

12. **Location of the Proposal:** (Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any. If a proposal would occur over a range of area, provide the range or boundaries of the site(s).)

Proposal (Subject)	Location of the Proposal (Area of Applicability)
(1) Mor Furniture Land Use Designation Change	1824 S. 49 th Street
(2) Electric Fences	Citywide, in C-1 and C-2 Commercial Districts, and CIX Mixed Use Industrial District and WR Warehouse Residential District
(3) Shipping Containers	Citywide, in C-1 and C-2 Commercial Districts, and residentially zoned sites (operating with a Conditional Use Permit)
(4) Delivery-Only Retail Businesses	Citywide, in zoning districts allowing for retail commercial uses
(5) Commercial Zoning Update Phase I: Neighborhood Commercial Design Standards	Citywide, in commercially zoned areas (C-1, C-2, T, and PDB). Some updates are further geographically constrained by either neighborhood commercial FLUM or designated Pedestrian Streets.
(6) Minor Plan and Code Amendments	Citywide

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: 

Name of signee: Adam Nolan

Position and Agency/Organization: Associate Planner, City of Tacoma

Date Submitted: March 9, 2023

D. SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment. When answering these questions, be aware of the extent the proposal or the types of activities likely to result from the proposal that would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

All subjects of the 2023 Amendment are non-project actions and as such would not directly impact water and air quality, release hazardous substances, or produce noise.

Concerning Subject #1 (Mor Furniture), the proposal could further facilitate the possible future development of the vacant undeveloped subject site with the applicant's Commercial zoned parcels to the north of the subject site. If the site were to be developed for commercial uses (furniture outlet store), vehicular traffic to and from the site could increase and there could be an increase in impervious service on the site. These could result in an increase in discharge to water and an increase in vehicle emissions to air. There is also potentially increase production of noise, and this would be addressed at site rezone and permitting stages.

Development of a furniture outlet store or other commercial use could generate more vehicle trips to the site. The subject site is located adjacent to Interstate 5 and traffic from the interstate is the primary driver of adverse air quality in the surrounding area, but additional trips could further contribute to air quality issues. With the subject site located adjacent to a middle school on South 49th Street, future development will likely be conditioned to have public access to the subject site from applicant-owned South 48th Street Commercial parcels. Based on preliminary trip generation studies conducted by a consultant, 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; may potentially add five PM peak hour trips to the street grid via the existing Mor Furniture Commercial zoned parcels driveway on South 48th Street and would not materially affect traffic operations; and no apparent conflicts/issues with traffic safety at intersections and streets near subject site or with existing pedestrian, bicycling, and transit infrastructure or level of service. Additional traffic studies will likely be required at site rezone and/or permitting stages. (See Attachment A)

There is the potential for increased production of noise if the Mor Furniture Outlet (or other commercial use) is developed. Noise studies are not required as part of a land use designation change request. Noise impacts would be addressed at site rezone and permitting stages.

The potential for release of toxic or hazardous substance would be contingent upon proposed development. The storage, use, disposal of any hazardous material or toxic substance is subject to federal, state and local regulation and oversight. The subject site is also in a critical area of the South Tacoma Groundwater Protection District (STGPD) and an aquifer recharge area and is subject to no net loss of critical areas and could be subject to additional regulations.

As mentioned, there is not a specific development proposal at this time and such a proposal would almost certainly trigger further SEPA evaluation based on several possible SEPA thresholds and criteria. With a specific development proposal much more accurate estimates could be given of impacts and evaluated. SEPA will be required at the rezoning phase and at the development phase and the above-mentioned impacts, and any others that might be found given specifics of future applications, will be thoroughly evaluated as part of those future SEPA evaluations. (Attachment B: Mor Furniture Impacts Analysis)

Concerning Subject #5 (Commercial Zoning Update), the proposal clarifies the applicability of existing standards, some of which help to mitigate things like discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise. At a

minimum, as a non-project action, the project should not directly contribute to any environmental hazards and any future proposed project action within the City's commercially zoned areas would still be subject to project-level environmental review.

Proposed measures to avoid or reduce such increases are:

Impacts resulting from future project-specific development proposals would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code.

Concerning Subject #1 (Mor Furniture), any future development project for the site would undergo permitting evaluation, and current development standards would be implemented through building and site development permits that would likewise mitigate the impacts of new impervious surfaces. These include the City's landscaping and tree canopy standards, design requirements, setback standards, as well as the implementation of updated stormwater standards in the City's Stormwater Management Manual. The site is also subject to all the requirements of the STGPD. (See Attachment B)

At the time of development, it is possible that other traffic mitigations would be imposed to enhance traffic safety and flow, and these could help reduce traffic impact and vehicle emissions, and even noise impacts. These will be a focus of SEPA at subsequent rezoning requests and again at the time of an actual development proposal and permitting request.

Concerning Subject #5 (Commercial Zoning Update), the proposal clarifies the applicability of existing standards, some of which help to mitigate things like discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

All subjects of the 2023 Amendment are non-project actions and as such would not directly impact plants, animals, fish, or marine life.

Concerning Subject #1 (Mor Furniture), possible impacts from light and sound are not required to be studied as part of land use designation change amendment request, however those impacts would likely be able to be mitigated. Outlining specific mitigations without a specific development proposal is not possible, but generally placement of lights, configuration, and placement of equipment, etc. may be required to help keep impacts to a minimum.

A critical area review will be required in advance of a rezoning and permitting application for the portions of the subject sites which have been shown to have critical area features. This will include verification of the non-wetland and no-Biodiversity Area/Corridor determinations in the report. At the time of any development proposal of the subject sites, further evaluation will also be required, and the sites are all subject to SEPA evaluation if trigger thresholds are exceeded.

Concerning Subject #2 (Electric Fences) could limit the movement of animals in, around, and through critical areas.

Concerning Subject #5 (Commercial Zoning Update), the proposal clarifies the applicability of existing standards, some of which help to mitigate impacts to plants, animals, fish, or marine life. At a minimum, as a non-project action, the project should not directly contribute to any environmental hazards and any future proposed project action within the City's commercially zoned areas would still be subject to project-level environmental review.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

Impacts resulted from future project-specific development proposals would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code.

Regarding Subject #1 (Mor Furniture), critical area review will be required in advance of a rezoning and permitting application for the portions of the subject sites which have been shown to have critical area features.

Concerning Subject #2 (Electric Fences), to allow free movement of animals that often live in, or around, or move through critical areas, electric fences will not be allowed in or around critical areas (except this will not apply to the STGPD).

Concerning Subject #5 (Commercial Zoning Update), the proposal clarifies the applicability of existing standards, some of which help to mitigate impacts to plants, animals, fish, or marine life.

3. How would the proposal be likely to deplete energy or natural resources?

All subjects of the 2023 Amendment are non-project actions and as such would not directly impact energy or natural resources.

Concerning Subject #1 (Mor Furniture), the potential development of a Mor Furniture Outlet store would increase the use of power and utilities on the currently vacant, undeveloped site. There is power, stormwater, and wastewater utility infrastructure in proximity of the site to serve potential development.

Concerning Subject #2 (Electric Fences), electric fences can run off of AC or DC power with solar power back up. The demand of an electric fence will not place an unusual burden on the power grid.

Concerning Subject #5 (Commercial Zoning Update), the proposal clarifies the applicability of existing standards, some of which help to mitigate the depletion of energy or natural resources. At a minimum, as a non-project action, the project should not directly contribute to any environmental hazards and any future proposed project action within the City's commercially zoned areas would still be subject to project-level environmental review.

Proposed measures to protect or conserve energy and natural resources are:

Impacts resulted from future project-specific development proposals would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code as well as all Tacoma Power and utility requirements which encourage energy and resource conservation.

Concerning Subject #5 (Commercial Zoning Update), the proposal clarifies the applicability of existing standards, some of which help to mitigate the depletion of energy or natural resources.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

All subjects of the 2023 Amendment are non-project actions and as such would not directly impact environmentally sensitive areas or areas designated for governmental protection.

Concerning Subject #1 (Mor Furniture), it is possible that development of the subject site could have impacts on the designated open space parcels to the east and south, the site of Giaudrone Middle School and open space or school-affiliated recreational parcels. Further evaluation of possible impacts will be considered again at any subsequent rezoning action, and then likely at time of development as a furniture outlet store (or other commercial use). Such a proposal would be of a sufficient scale to trigger SEPA. That review will occur and if any changes have occurred on the Giaudrone Middle School parcels then it will be considered under the subsequent evaluations. The site is also within the STGPD and subject to those additional requirements and regulations. 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.

Concerning Subject #2 (Electric Fences), electric fences could limit the movement of animals in, around, and through critical areas.

Concerning Subject #5 (Commercial Zoning Update), the proposal clarifies the applicability of existing standards, some of which help to mitigate impacts to environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands. At a minimum, as a non-project action, the project should not directly contribute to any environmental hazards and any future proposed project action within the City's commercially zoned areas would still be subject to project-level environmental review.

Proposed measures to protect such resources or to avoid or reduce impacts are:

Impacts resulted from future project-specific development proposals would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code.

Concerning Subject #2 (Electric Fences), to allow free movement of animals that often live in, or around, or move through critical areas, electric fences will not be allowed in or around critical areas (except this will not apply to the STGPD).

Concerning Subject #5 (Commercial Zoning Update), the proposal clarifies the applicability of existing standards, some of which help to mitigate impacts to environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

All subjects of the 2023 Amendment are non-project actions and as such would not directly impact the compatibility of land or shoreline uses with the Comprehensive Plan.

Proposed measures to avoid or reduce shoreline and land use impacts are:

Impacts resulted from future project-specific development proposals would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code.

Relating to Subject #1 (Mor Furniture), future project-specific development proposals that may result in these impacts would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code, design manuals, and regulations.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

All subjects of the 2023 Amendment are non-project actions and as such would not directly impact the transportation system or public services and utilities.

Concerning Subject #1 (Mor Furniture), the applicant engaged a consultant who completed a preliminary trip generation study that indicated 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; may potentially add five PM peak hour trips to the street grid via the existing Mor Furniture Commercial zoned parcels driveway on South 48th Street and would not materially affect traffic operations; and no apparent conflicts/issues with traffic safety at intersections and streets near subject site or with existing pedestrian, bicycling, and transit infrastructure or level of service. This level of increase would be considered minor, however, added traffic mitigations may be necessary (including considerations of accessing the site to mitigate impacts on Gaudrone Middle School). This will continue to be evaluated at the subsequent rezoning request, and then again at the time of development permitting. Additional traffic studies will likely be required at site rezone and/or permitting stages. (See Exhibit A)

There could be an increased impact to area utilities, sewer, power and water, however without a specific proposal, it is not possible to determine what level of impact that might be. Future project-specific development proposals that may result in these impacts would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code.

Concerning Subject #5 (Commercial Zoning Update), the proposal clarifies the applicability of existing standards, some of which help to mitigate impacts on transportation or public services and utilities. At a minimum, as a non-project action, the project should not directly contribute to any environmental hazards and any future proposed project action within the City's commercially zoned areas would still be subject to project-level environmental review.

Proposed measures to reduce or respond to such demand(s) are:

Impacts resulted from future project-specific development proposals would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code.

Concerning Subject #1 (Mor Furniture), without a specific proposal, measures and mitigations cannot be outlined. Future project-specific development proposals that may result in impacts would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code. Possible mitigations in the future may include specific requirements for equipment placement locations, traffic control additions including signals, installation of other traffic calming devices, additional tree canopy/landscape buffering, protection of known critical areas, etc. These will all be considered in greater detail under subsequent rezoning requests and then again at the time of request for developmental permits.

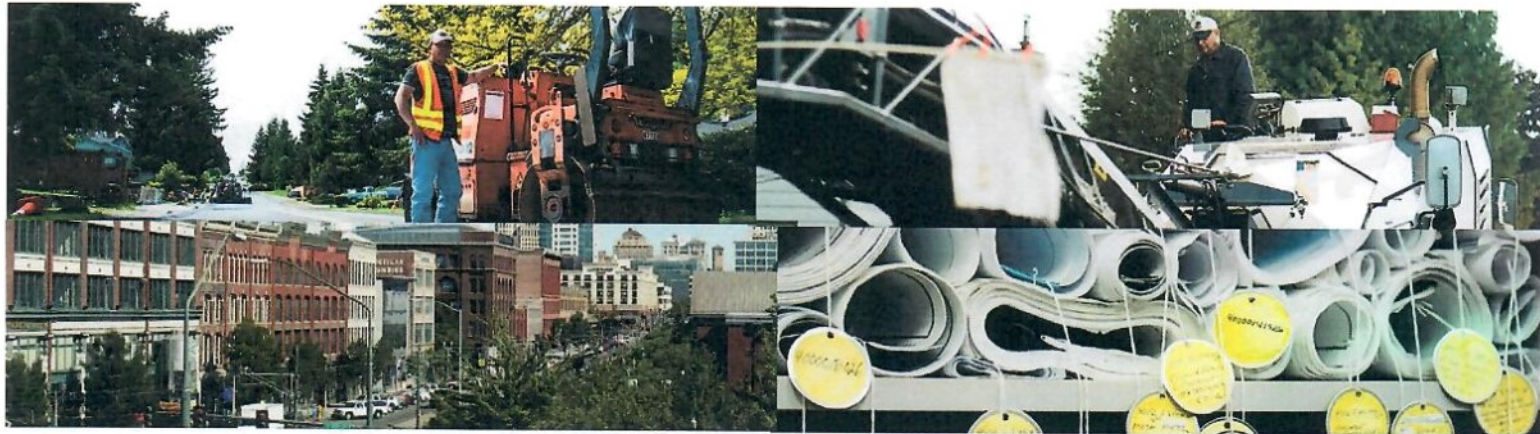
Concerning Subject #5 (Commercial Zoning Update), the proposal clarifies the applicability of existing standards, some of which help to mitigate impacts on transportation or public services and utilities.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

No conflicts with local, state or federal laws for the protection of the environment are anticipated. The 2023 Amendment proposal package is also being reviewed for consistency with the State GMA, the Puget Sound Regional Council Vision 2050 and the Pierce County Countywide Planning Policies. If conflicts with local, state or federal laws for the protection of the environment are identified, they will be rectified prior to adoption.

Attachments:

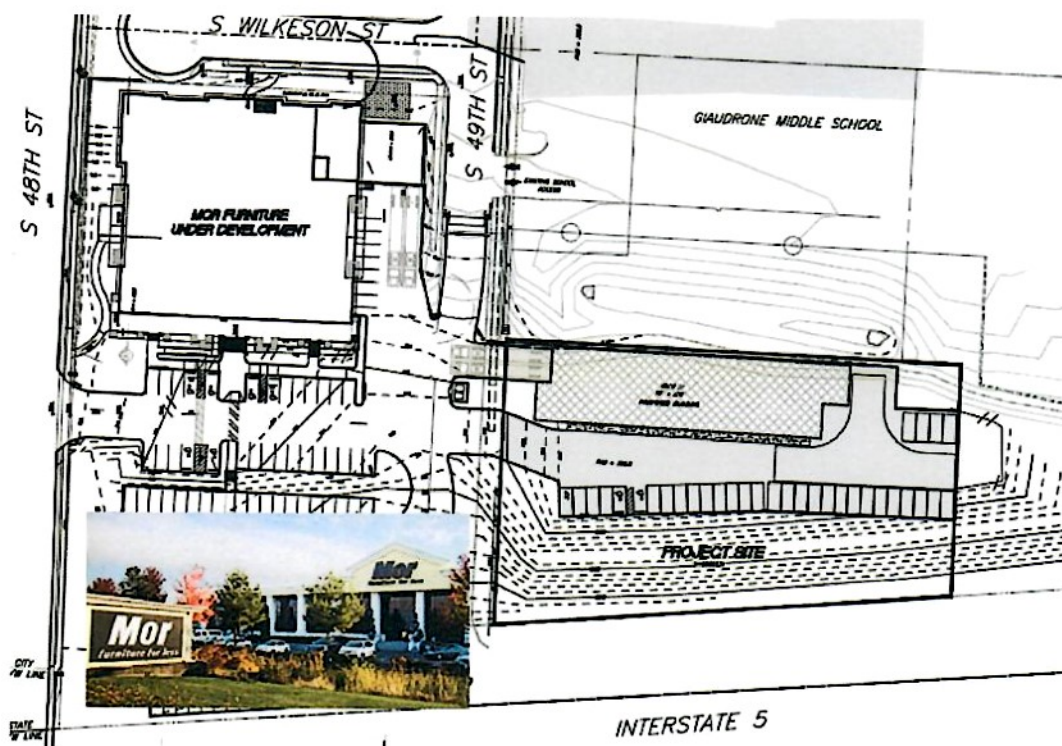
- Attachment A: Mor Furniture Preliminary Trip Generation Analysis
- Attachment B: Mor Furniture Impacts Analysis



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





December 22, 2022

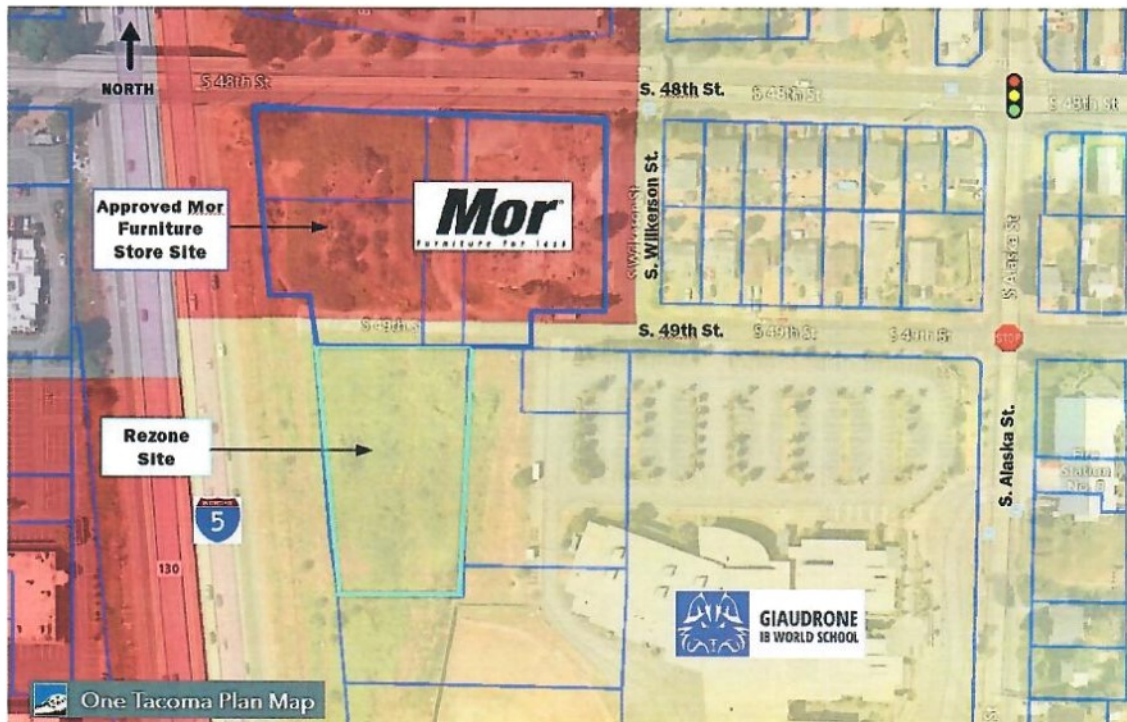
CITY OF TACOMA
Attn: Jennifer Kammerzell, Assistant Division Manager
747 Market Street
Tacoma, WA 98402

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:



CITY OF TACOMA

Attn: Jennifer Kammerzell, Assistant Division Manager

December 22, 2022

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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.

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Attn: Jennifer Kammerzell, Assistant Division Manager

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1. *Proposed ~~10,000~~ 10,175 SF building net, with 33 parking stalls on grade and a fire lane.*
 - a. *Warehouse required parking is $1/2000\text{SF} = 5$ spaces required for 100% warehouse*
 - b. *Retail $<15000\text{SF}$ 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.

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Attn: Jennifer Kammerzell, Assistant Division Manager

December 22, 2022

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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%	35	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.

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Attn: Jennifer Kammerzell, Assistant Division Manager
December 22, 2022
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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:

Pierce Transit System Map

Stop #2653
 Description: 48th / Alaska
 Routes Served: 54, 55

Stop #2670
 Description: 48th / Alaska
 Routes Served: 54, 55

Map labels include: Tacoma Mall Blvd, S 48th St, S 47th St, S 46th St, S 45th St, S 44th St, S 43rd St, S 42nd St, S 41st St, S 40th St, S 39th St, S 38th St, S 37th St, S 36th St, S 35th St, S 34th St, S 33rd St, S 32nd St, S 31st St, S 30th St, S 29th St, S 28th St, S 27th St, S 26th St, S 25th St, S 24th St, S 23rd St, S 22nd St, S 21st St, S 20th St, S 19th St, S 18th St, S 17th St, S 16th St, S 15th St, S 14th St, S 13th St, S 12th St, S 11th St, S 10th St, S 9th St, S 8th St, S 7th St, S 6th St, S 5th St, S 4th St, S 3rd St, S 2nd St, S 1st St, S 0th St, S -1st St, S -2nd St, S -3rd St, S -4th St, S -5th St, S -6th St, S -7th St, S -8th St, S -9th St, S -10th St, S -11th St, S -12th St, S -13th St, S -14th St, S -15th St, S -16th St, S -17th St, S -18th St, S -19th St, S -20th St, S -21st St, S -22nd St, S -23rd St, S -24th St, S -25th St, S -26th St, S -27th St, S -28th St, S -29th St, S -30th St, S -31st St, S -32nd St, S -33rd St, S -34th St, S -35th St, S -36th St, S -37th St, S -38th St, S -39th St, S -40th St, S -41st St, S -42nd St, S -43rd St, S -44th St, S -45th St, S -46th St, S -47th St, S -48th St, S -49th St, S -50th St, S -51st St, S -52nd St, S -53rd St, S -54th St, S -55th St, S -56th St, S -57th St, S -58th St, S -59th St, S -60th St, S -61st St, S -62nd St, S -63rd St, S -64th St, S -65th St, S -66th St, S -67th St, S -68th St, S -69th St, S -70th St, S -71st St, S -72nd St, S -73rd St, S -74th St, S -75th St, S -76th St, S -77th St, S -78th St, S -79th St, S -80th St, S -81st St, S -82nd St, S -83rd St, S -84th St, S -85th St, S -86th St, S -87th St, S -88th St, S -89th St, S -90th St, S -91st St, S -92nd St, S -93rd St, S -94th St, S -95th St, S -96th St, S -97th St, S -98th St, S -99th St, S -100th St.

\\JTE,Inc\c\Project Files\2022.061 - Mor Furniture Storage Building - Mor Furniture; Larson & Associates - Tacoma\MorFurnitureRezone-TrafficMemorandum.doc

CITY OF TACOMA

Attn: Jennifer Kammerzell, Assistant Division Manager

December 22, 2022

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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

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@rrlarsen.com>; 'Grant Middleton' <gmiddleton@rrlarsen.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 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%	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 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



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 information 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.

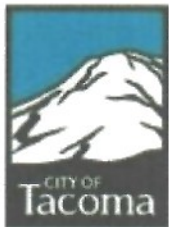
This information can also be found on page 8 here:

chrome-

extension://efaidnbmnnnibpcajpcgiclfindmkaj/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!](#)



Report Category

Summary Reports

Report Name

Total Crashes

Report Year

2021

Select Report Parameters

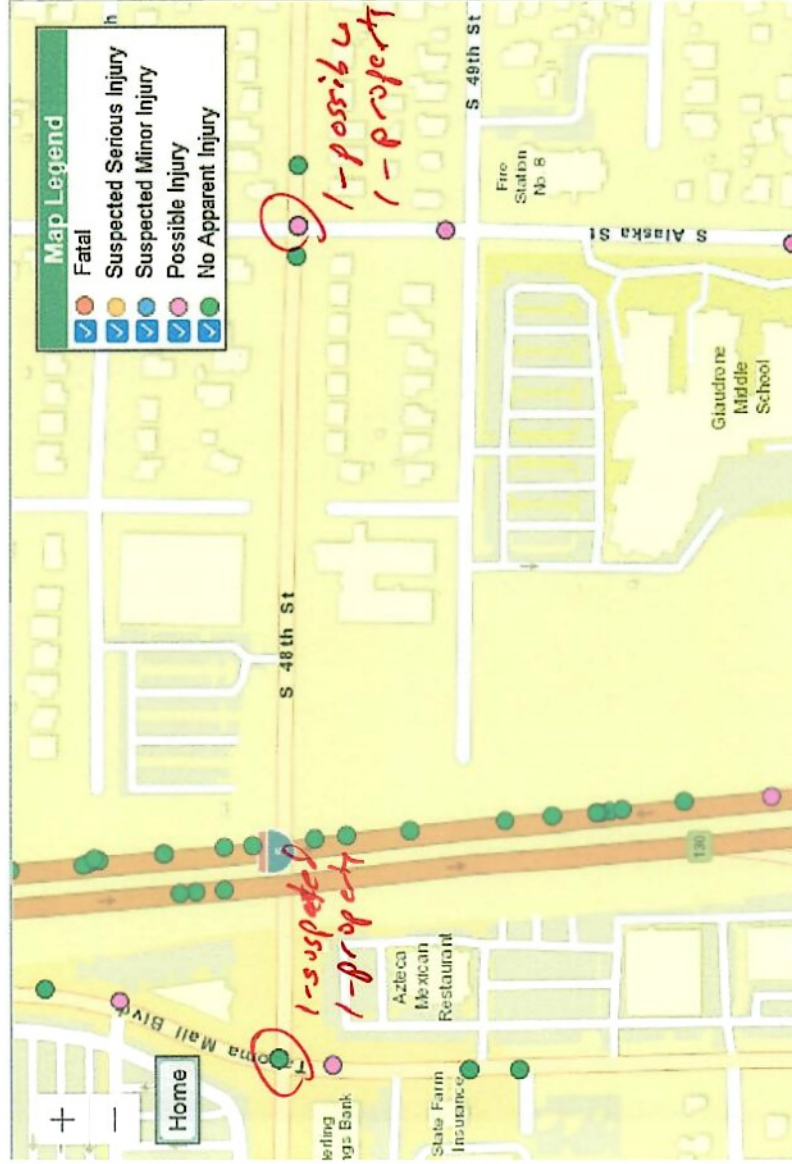
Location

Region: (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 compiled 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



Report Category

Summary Reports

Report Name

Total Crashes

Select Report Parameters

Report Year

2020

Location

Region: (All)

County: (All)

City: Tacoma

Jurisdiction

(All)

Run Report



Search

Portal FAQs Feedback

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 compiled 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
Suspected Serious Injury
Suspected Minor Injury
Possible Injury
No Apparent Injury
Total Crashes

19
71
262
892
2,649
3,893



Report Category

Summary Reports

Report Name

Total Crashes

Select Report Parameters

Report Year

2019

Region:

(All)

County:

(All)

City:

Tacoma

Location

(All)

Jurisdiction

(All)

Run Report



Search

Portal FAQs

Feedback

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 compiled 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



Report Category

Summary Reports

Report Name

Total Crashes

Select Report Parameters

Report Year

2018

Location

Region: (All)

County: (All)

City: Tacoma

Jurisdiction

(All)

Run Report



Search

Portal FAQs Feedback

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 compiled 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

Fatal

Suspected Serious Injury

Suspected Minor Injury

Possible Injury

No Apparent Injury

Total Crashes

Crashes

15

77

337

1,148

3,643

5,220



Report Category: **Summary Reports** | Report Name: **Total Crashes**

Select Report Parameters

Report Year: **2017**

Location: Region: **(All)** | County: **(All)** | City: **Tacoma**

Jurisdiction: **(All)**

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 compiled 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

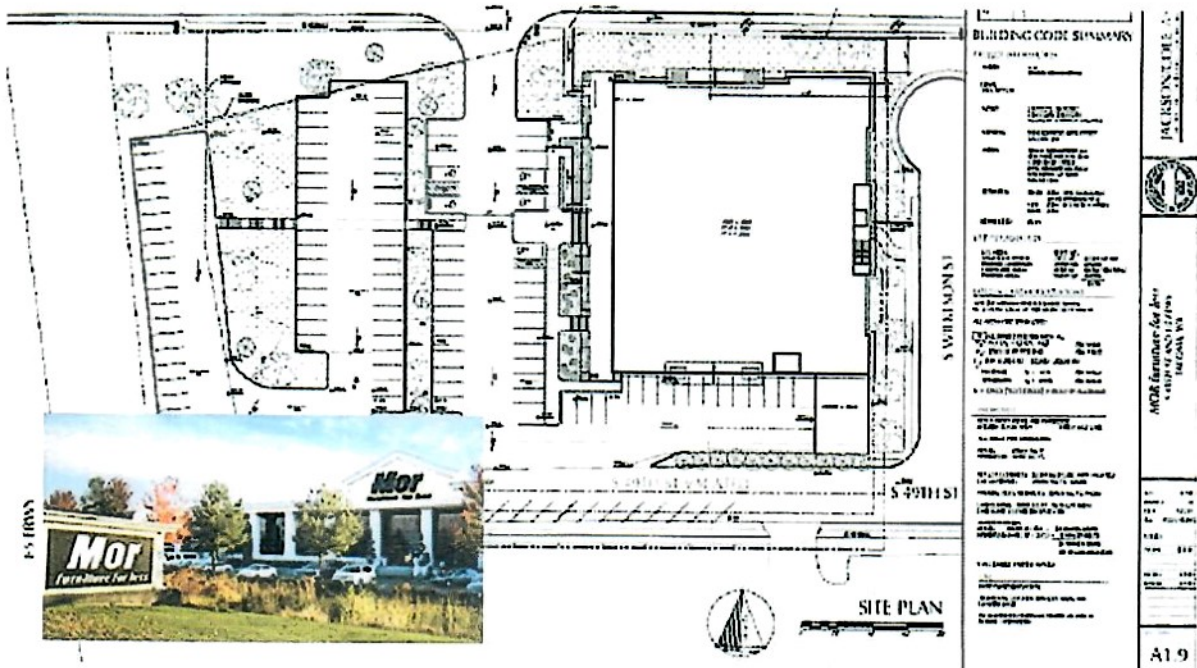
Most Severe Injury per Crash		Crashes
Fatal		12
Suspected Serious Injury		85
Suspected Minor Injury		343
Possible Injury		1,160
No Apparent Injury		3,675
Total Crashes		5,275



Tacoma

SOUTH 48TH STREET MOR FURNITURE TRAFFIC IMPACT ANALYSIS

February 3, 2014



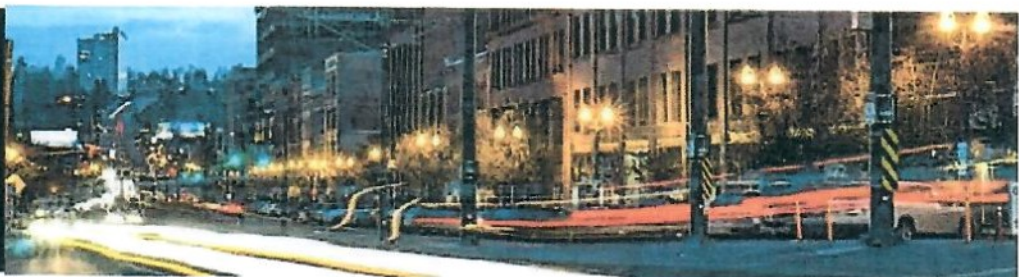
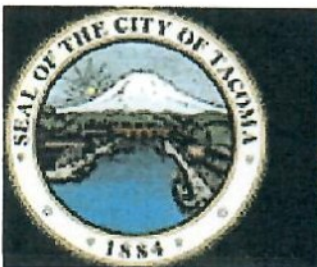
JTE . Jake Traffic Engineering, Inc.

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





Jake Traffic Engineering, Inc.



Mark J. Jacobs, PE, PTOE

President

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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

Michael Zeller, Director of Facilities
MOR FURNITURE FOR LESS, INC.
February 3, 2014
Page -10-

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 and 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.

Michael Zeller, Director of Facilities
MOR FURNITURE FOR LESS, INC.
February 3, 2014
Page -11-

- 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.



MJJ: mjj

EXPIRES 4/3/2014

Very truly yours,

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

02.03.2014

PM PEAK HOUR LEVEL OF SERVICE

TABLE 1

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

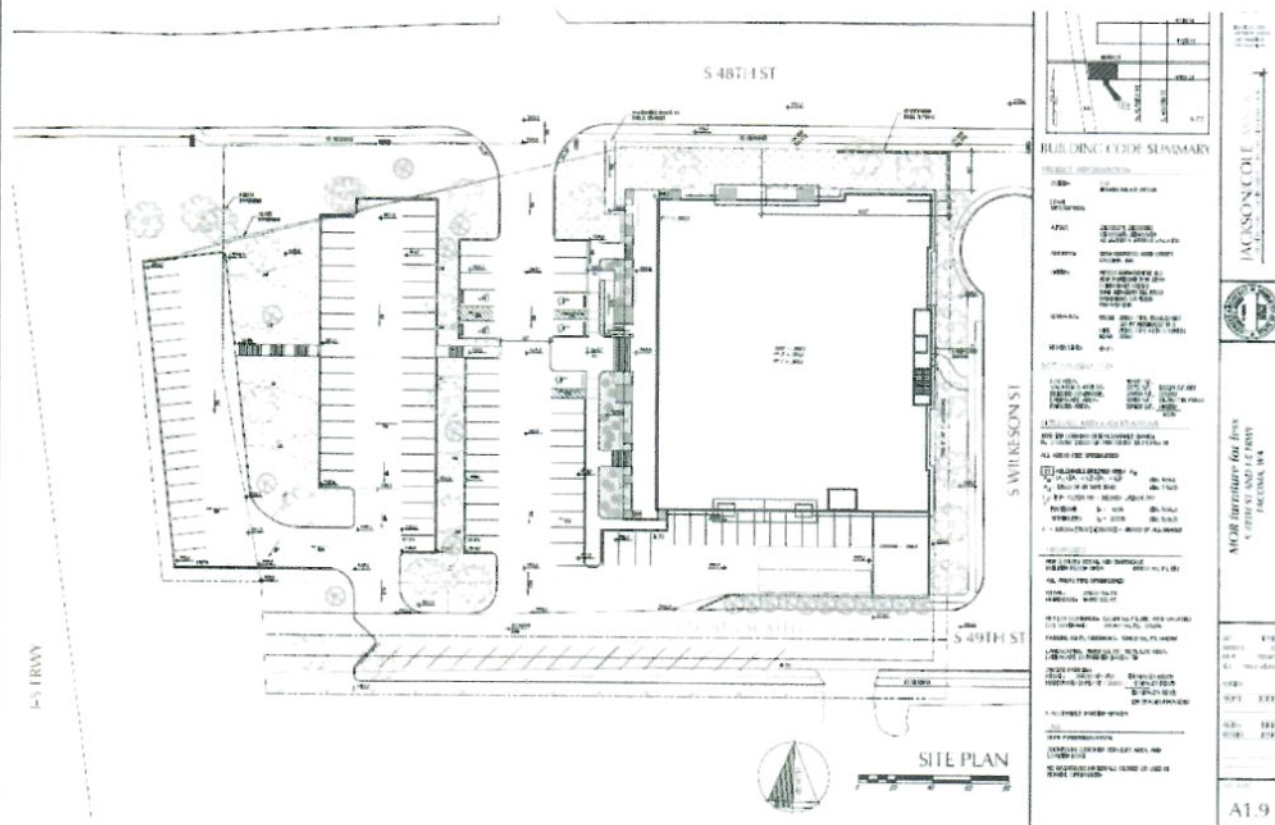
INTERSECTION	APPROACH	EXISTING	2018 W/O PROJECT	2019 W/ PROJECT
1. S. 48 th St./Tacoma Mall Boulevard	Overall	C (30.2)	C (32.5)	C (32.8)
2. S. 48 th St./Macy's - Mor (future) access	SB EBLT NB WBLT	B (11.2) A (8.4) - -	B (11.4) A (8.6) - -	B (14.8) A (9.1) C (20.6) A (8.6) <i>Note: Saturday peak turning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



NORTH

LEGEND

- Approach Lane & Direction
- STOP 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

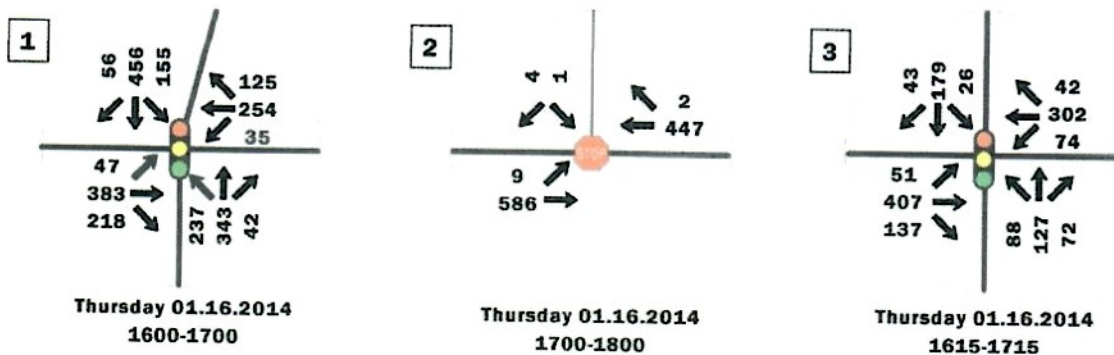


JTE, Inc.
FIGURE 3

Reprint in Color Only

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

EXISTING STREET CONDITIONS



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 **Stop Sign**

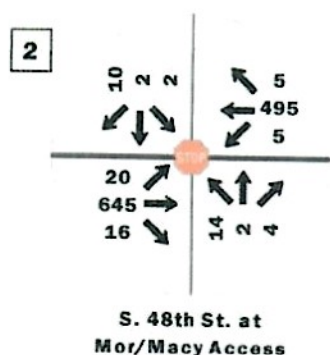
Traffic Signal

x **Analysis I/S #**

X-L's **# of Travel Lanes**

XX MPH **Posted Speed Limit**

Image obtained from
Pierce County Public GIS



* - 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**

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

Analysis Requirements

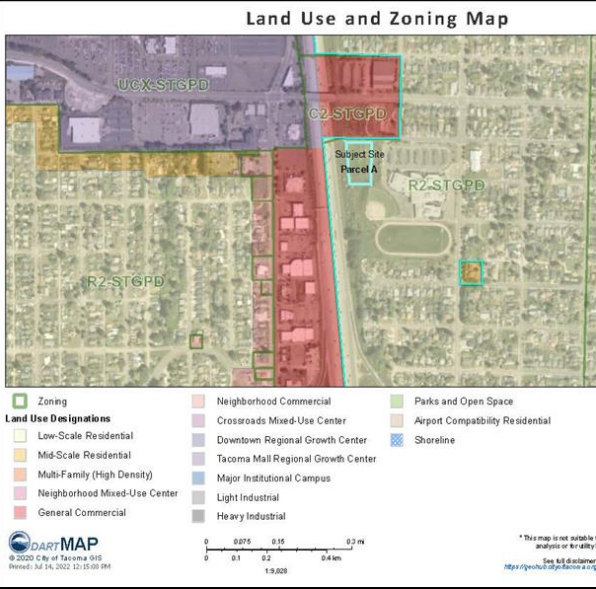
Tacoma Municipal Code 13.02.070.F requires the following analysis of proposed amendments, including as appropriate:

- 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

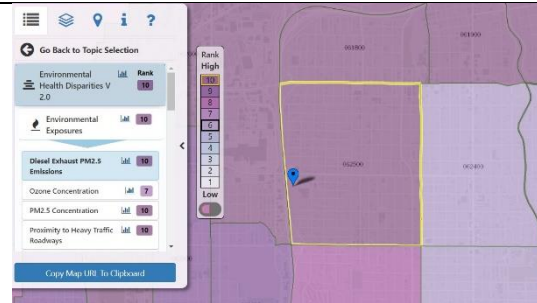
Additional Analysis

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		
<p>TMC Title 13 Land Use Regulatory Code</p> <p>TMC 2.19 Site Development Code</p> 	<p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>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.</p>

Parking		
<p>TMC 13.06.090.C Off-street parking areas</p> <p>TMC 13.06.090.D Loading Spaces</p>	<p>Currently the site is vacant and no parking is provided on site.</p>	<p>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.</p> <p>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.</p>
Air Quality		
<p>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.</p> <p>Regulatory Hierarchy for air quality policy, regulations, and monitoring: United States Environmental Protection Agency Washington State Dept. Of Ecology Puget Sound Clean Air Agency</p>	<p>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.”</p>	<p>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.</p> <p>Goal LU-1 (Mixed-use development) of the Tacoma Mall Neighborhood Subarea Plan</p>



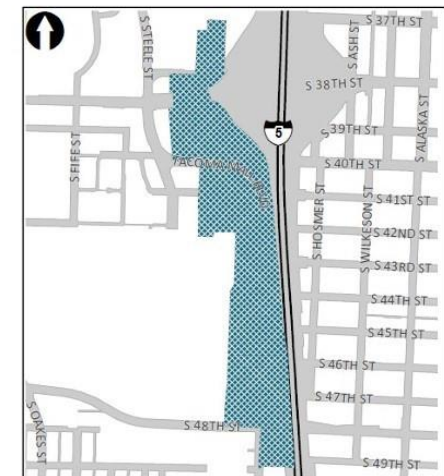
Giaudrone Middle School borders the subject site to the east. The Giaudrone MS attendance boundary encircles low- and very low-opportunity neighborhoods, as identified on the City's Equity Map. Student and resident health are important concerns, especially in considering adverse health effects from PM2.5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

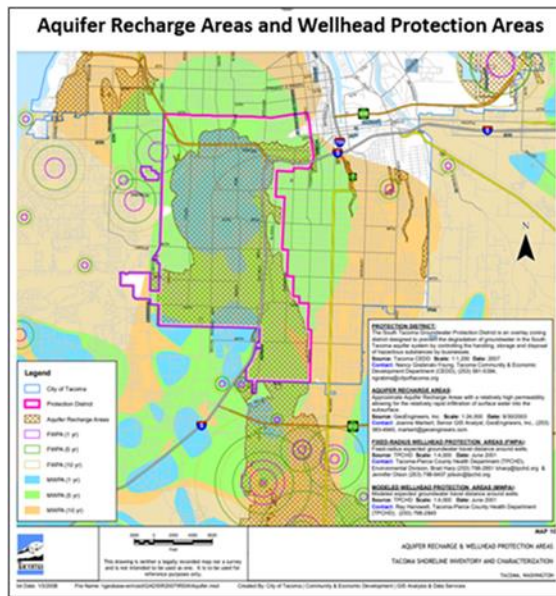
South Tacoma Groundwater Protection District Infiltration Policy, ESD17-1 dated Jan. 9, 2017

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

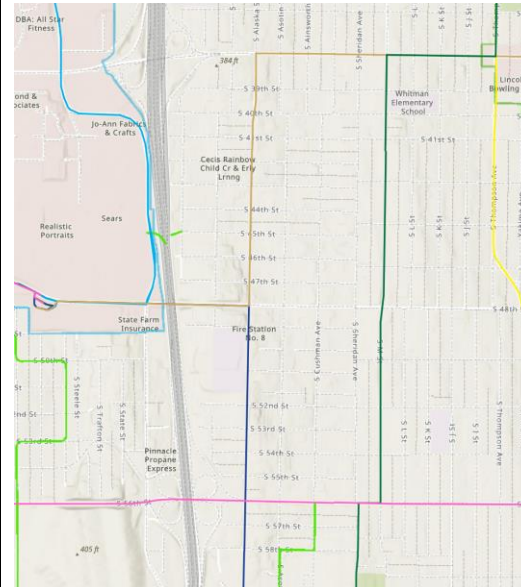
	<p>The parcel contains slopes that range from 25-40% and >40%. Rated “Very Low” Liquefaction Susceptibility.</p> <p>No identified flood hazard, wetlands, streams, or biodiversity area/corridor.</p> <p>Stormwater and Wastewater utility infrastructure in proximity to serve potential development of parcel.</p> <p>The project is located within the Flett Creek Watershed. The Stormwater Management Manual outlines the stormwater mitigation requirements for each watershed.</p>	<p>development project meets impact thresholds, applicant will be required to address flow control and water quality.</p> <p>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.</p> <p>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.</p>
Plants and Tree Canopy		
<p>TMC Title 13 Land Use Regulatory Code</p> <ul style="list-style-type: none"> TMC 13.06.030.F Commercial District Development Standards TMC 13.06.090.B Landscaping Standards <p>Urban Forest Manual</p>	<p>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).</p> <p>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.</p>	<p>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.</p> <ul style="list-style-type: none"> Parking lot overall tree planting requirements: One Small Tree per 700 square feet; one Medium Tree per 1,000 square feet; or, one

		<p>Large Tree per 1,400 square feet of parking lot area.</p> <ul style="list-style-type: none"> • 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. <p>Finally, of note, under the existing zoning, there are no tree canopy requirements for residential development.</p>
Aesthetics, Light, and Glare		
<p>TMC 13.06.090 Site Development Standards</p> <p>TMC 13.06.100 Building design standards</p> <p>TMC 13.06.100.A Commercial District Minimum Design Standards</p>	<p>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</p>	<p>Not applicable at this stage of consideration of land use designation change of a vacant/undeveloped parcel.</p> <p>Applicant will be required to meet applicable requirements in project-level stages, including aesthetic requirements</p>

	<p>Wilkerson St.); and approximately 600' separation between nearest residential property to the south.</p> 	<p>detailed in TMC 13.06.100.A Commercial District Minimum Design Standards.</p> <p>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.</p> <p>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.</p>
<p>Parks and Recreation</p>		
<p>TMC Title 13.06.090 Site Development Standards</p> <ul style="list-style-type: none"> TMC 13.06.090.F Pedestrian and bicycle support standards 	<p>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.</p>	<p>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</p>

Transportation		
<p>TMC 13.06.090.F Pedestrian and bicycle support standards</p> <p>13.06.100 Building design standards (A. Commercial District Minimum Design Standards)</p> <p>TMC 13.12.580 Traffic Impact Assessment</p> <p>Destination 2040: Pierce Transit Long Range Plan Update (2020)</p>	<p>Auto: Several streets in close proximity to subject site are designated arterials per TMC 11.05.490 Arterial streets designated:</p> <ul style="list-style-type: none"> 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) <p>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.</p> <p>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.</p> <p>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</p>	<p>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.</p> <p>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.</p>

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

	<p>pedestrian connections to the surrounding neighborhoods due to the middle school, I-5, and commercial properties to the north.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Interstate 5 crossing study over/under S 48th Street overpass tentatively expected to begin Summer 2023.</p>	<p>would likely be more auto-dependent due to the lack of immediate connectivity and walkable destinations.</p>
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