



**PROPOSED AMENDMENTS
TO THE PARKING REQUIREMENTS
FOR THE INTERNATIONAL FINANCIAL SERVICES AREA (IFSA)**

STAFF REPORT
TACOMA PLANNING COMMISSION PUBLIC HEARING
FEBRUARY 4, 2009

A. SUBJECT:

The proposed amendment would: (1) add a Note 13 to the Tacoma Municipal Code 13.06A.060 Development Standards, Development Standards Table, as follows “Minimum and maximum off-street parking requirements do not apply within the International Financial Services Area (IFSA) (Figure 1); parking provision must comply with federal and state ADA regulations” and, (2) add the following to Footnote 2 “, except that no parking stalls will be required for residential development located within the IFSA (Figure 1); parking provision must comply with federal and state ADA regulations”. See Attachment A, and Figure 1 contained here within.

Attachment B to this Staff Report contains: Resolution No. 37508 designating the IFSA as a special emphasis area within the Downtown Commercial Core; the Request to the Planning Commission from the City Council’s Environment and Public Works Committee to study the parking requirements in the IFSA; and a Memorandum from the Planning Division to the Planning Commission dated December 11, 2008. The Memorandum points out that “**The intent is to modify the parking requirement as the first implementation step of the Downtown Plan and move forward implementation of the City Manager’s mobility and parking strategy**”. (Emphasis added).

B. BACKGROUND:

City Council Resolution No. 37508 establishes the IFSA as the area between 8th and 15th, Commerce and I-705. Further, the resolution notes that downtown development regulations “...may contain provisions which are a barrier to facilitate desired development and need to be revised...”; the resolution directs the City Manager to bring back to the City Council recommendations for a Downtown Tacoma Economic Development Strategy as prepared by AngelouEconomics, as well as any additional recommendations regarding steps that can be taken and policy choices that can be considered that would help Tacoma grow its international financial services industry. Finally, listed among the downtown regulations to be evaluated are off-street parking requirements.

The “Downtown Tacoma Economic Development Strategy, July 2008 Draft (Strategic Plan), prepared by Angelou Economics, first highlights that “Downtown Tacoma is the city’s economic and historic core, with 39,300 employees and over 15,000 residents generating a new vibrancy that Tacoma hasn’t seen in many years.” It then identifies the best target sectors for the City’s economic development efforts and sets forth “...a practical, implementable roadmap to increase private investment in Downtown Tacoma.”

This roadmap focuses on seven strategic nodes within downtown, one of which is the IFSA, places a short-term priority emphasis on visioning/planning and public policy work that can aid employer recruitment and expansion within the IFSA, and calls for supporting investor interests by providing additional incentives. In this latter regard, the

Strategic Plan emphasizes that: “Development in downtown areas is almost universally more difficult than it is in suburban locations, due to less availability of land, stringent development restrictions, inadequate or deteriorating infrastructure, and limited parking options. In order to make a downtown location as appealing as a suburban location for developers, cities must often support investor interests by providing additional incentives...”.

This roadmap and this incentive approach are consistent with the recommendations of the City’s Green Ribbon Climate Action Task Force, recommendations that are “...a selection of calculated decisions that represent a blueprint for Tacoma to reduce its greenhouse gas emissions...” Page 4. This ‘blueprint’ includes a major focus on transit-oriented development, zoning standards that support increased use of public transit, and changing parking policies to discourage single-occupancy vehicles. Of particular note is Recommendation #19 in Chapter VI “Strategies to Reduce Greenhouse Gas Emissions”: “Reduce or eliminate parking minimums required for residential/mixed-use developments to encourage transit or non-motorized transportation and thereby making these developments more profitable.”

The range of potential incentives is thoroughly discussed in the 2008 Update to the Downtown Element of the City’s Comprehensive Plan, an update based on the Strategic Plan and additional design and planning work prepared by VIA Architecture. The Downtown Element has a major focus on sustainability, and in particular on sustainable transportation choices (Section 2.3F): “One of the most important aspects of growing sustainability is an efficient, comfortable, and useable transportation system that provides alternatives to the single-occupancy vehicle. This is best accomplished through an integrated approach, providing enhanced pedestrian and cycling amenities, pedestrian-orientated, compact urban design, and efficient and well-planned transit systems (along with effective automobile access).” Of particular note is Policy 2.1E.C: “Downtown should move towards the implementation of a shared satellite parking system, and **consider steps towards a market based approach within certain areas of downtown.**” (Emphasis added).

C. LAND USE REGULATORY CODE AMENDMENT PROCESS:

Proposed amendments to development regulations are developed pursuant to the procedures and requirements of Chapter 13.02 of the Tacoma Municipal Code. Once the Planning Commission has determined that an amendment warrants further analysis and public deliberation, Planning Division staff, under direction of the Planning Commission, conducts needed analysis and prepares the draft amendments for public review and comment. Proposed amendments are subject to the requirements of the State Environmental Policy Act and the Growth Management Act. The amendments receive detailed review by the Planning Commission and public hearing(s) are held to receive citizen comment. After further review, the Commission makes a recommendation to the City Council. The City Council reviews the proposed amendments, holds a public hearing, makes modifications as may be necessary and adopts, or declines to adopt, the proposed amendments.

The Tacoma Municipal Code (Chapter 13.02.045) sets forth the criteria to be used to determine if a change in development regulations is warranted; these criteria are set forth in Section D below. The Planning Commission may also consider other factors as warranted, including additional information that has become available since the development regulation now proposed for amendment was last adopted or amended.

D. ANALYSIS OF PROPOSED AMENDMENTS:

Applicable Provisions of the Growth Management Act:

The Growth Management Act (GMA) requires that development regulations be consistent with and implement the Comprehensive Plan. Development regulations include, but are not limited to, zoning controls, critical area ordinances, shoreline master programs, official controls, planned unit development ordinances, subdivision ordinances, and binding site plan ordinances.

The GMA also incorporates 14 primary goals, many of which either directly or indirectly relate to the proposed code amendment. They encourage growth in urban areas, discourage development sprawl, encourage the provision of a variety of housing styles, types and densities, support protection of the environment, promote the enhancement of open space and recreational amenities, and encourage public involvement in the planning process. GMA also includes specific guidance indicating that local jurisdictions should provide for innovative land use management techniques, including, but not limited to, density bonuses, cluster housing, planned unit developments, and the transfer of development rights. (RCW 36.70A.090) The proposed amendment is designed to provide additional incentives in the City's downtown regulatory code and to allow for additional flexibility directed at promoting urban growth, infill development, and reinvestment.

Tacoma Municipal Code Review Criteria:

Proposed amendments are required to meet at least one of the eleven review criteria to be considered by the Planning Commission. The following section provides a review of each of these criteria with respect to the proposal. Each of the criteria is provided, followed by staff analysis of the criterion as it relates to this proposal.

1. There exists an obvious technical error in the pertinent Comprehensive Plan or regulatory code provisions.

Staff Analysis: The proposed amendment does not seek corrections to any error in the Comprehensive Plan or the Land Use Regulatory Code. However, the proposal does seek to improve the consistency between the Comprehensive Plan goals and policies as they relate to the International Financial Services Area and the associated zoning code provisions addressing off-street parking.

2. The amendment is consistent with the Comprehensive Plan goals or policies or will achieve consistency.

Staff Analysis: For the reasons set forth in the project history section of this Staff Report, the proposed amendment will improve the consistency between the policies and goals of the Comprehensive Plan and the zoning regulations.

3. Circumstances related to the proposed amendment have significantly changed, or a lack of change in circumstances has occurred since the area or issue was last considered by the Planning Commission.

Staff Analysis: The policy context, as described in the responses to Criteria #2 and #11, has altered dramatically since downtown parking standards were last considered by the Planning Commission.

4. The needs of the City have changed, which support an amendment.

Staff Analysis: The needs of the City have changed as described in the responses to Criteria #2 and #11.

5. The amendment is compatible with existing or planned land uses and the surrounding development pattern.

Staff Analysis: For the reasons set forth in the response to Criterion #2, the amendment is compatible with existing and planned land uses and the surrounding development pattern.

6. Growth and development, as envisioned in the Plan, is occurring faster, slower, or is failing to materialize.

Staff Analysis: Growth and development in downtown, as envisioned in the Plan, is occurring slower than the desirable rate, a rate described in the response to Criterion #11.

7. The capacity to provide adequate services is diminished or increased.

Staff Analysis: For the reasons set forth in the response to Criterion #2, the capacity to provide adequate services is increased.

8. Plan objectives are not being met as specified, and/or the assumptions upon which the plan is based are found to be invalid.

Staff Analysis: Growth and development objectives for downtown, as envisioned in the Plan, are being achieved at a slower rate than that desired, an issue that is addressed in the response to Criterion #11.

9. Transportation and and/or other capital improvements are not being made as expected.

Staff Analysis: This proposed amendment is designed to modify the parking requirement as the first implementation step of the new Downtown Plan and move forward implementation of the City Manager's mobility and parking strategy.

10. Substantial similarities of conditions and characteristics can be demonstrated on abutting properties that warrant a change in land use intensity or zoning classification.

Staff Analysis: This proposal does not involve a change in land use intensity or zoning classification.

11. A question of consistency exists between the Comprehensive Plan and its elements and RCW 36.70A, the County-wide Planning Policies for Pierce County, Multi-County Planning Policies, or development regulations.

Staff Analysis: While these proposed amendments are not based on any specific inconsistencies between the City's planning documents and County-wide, regional or state policies, they will improve consistency in multiple ways. The Pierce County Buildable Lands Program, 2008 Consistency Evaluation, Draft Report 11/20/08 (Report), concludes that the City has sufficient land to accommodate its regional allocation of commercial and industrial employment. However, based on recent trends, the City's employment target of 39,000 new jobs by 2022 is projected to fall short by 7,000 jobs. Accordingly, the Report concludes that "...reasonable measures may be appropriate to increase employment capacity..." Report, page 71. Action on 'reasonable measures' is mandated by the Growth Management Act (RCW 36.70A.215) and Vision 2040 and the City is taking concerted action to comply, with a focus on employment retention and recruitment through new policies and development regulations such as the recently adopted revisions for the South Tacoma Manufacturing/Industrial Center and this proposal to eliminate parking requirements within the IFSA.

E. GENERAL INFORMATION:

1. Evaluation of Plan and Development Regulation Amendments

The proposed changes to the Land Use Regulatory Code regarding IFSA Parking Requirements were reviewed using the factors contained in the Tacoma Municipal Code; this review is set forth in Section D above. Other information used in this evaluation included Resolution No. 37508 adopting the IFSA; Resolution No. 37375 adopting the City Manager's Parking and Mobility Strategy; various reports, maps, illustrations, photos, and graphics produced by AngelouEconomics and VIA Architecture; and public comments received during the review and update of the downtown element of the Comprehensive Plan.

2. Environmental Evaluation

Pursuant to WAC 197-11 and Tacoma's SEPA procedures, a Preliminary Determination of Environmental Nonsignificance was issued on January 13, 2009. This preliminary determination, SEPA File Number: SEP2009-40000124693, was made based upon a review of a completed environmental checklist. The City will reconsider the preliminary determination based on timely public comments regarding the checklist and determination that are received by February 13, 2009 and unless modified, the preliminary determination will become final on February 20, 2009.

3. Public Review Process

The proposed amendments were presented to and discussed by the Planning Commission at their meetings, which are open to the public. The Commission reviewed the proposed changes and authorized the distribution of the proposed amendments for public review and comment on January 7, 2009. The proposed amendments, in strikeout and underscored format, staff analysis and environmental determination were made available for public review at all branches of the public library and at the office of the Community and Economic Development Department. The proposed amendment and all associated information were also posted on the City's website.

The proposed amendment was presented to the Downtown Merchants Group on January 8, 2009 and the New Tacoma Neighborhood Council on January 20, 2009. Other groups, such as the Downtown Tacoma Business Improvement Area, have been contacted and meetings are in the process of being scheduled.

4. Notification

Notice of the Planning Commission's public hearing was distributed to Neighborhood Council board members, other neighborhood groups, business district associations, civic organizations, environmental groups, development interests, adjacent jurisdictions, Puyallup Tribe, major employers and institutions, City and State departments, and other known interested individuals or groups. Notice was also provided to readily identifiable businesses located within the IFSA and to taxpayers of record for properties within the IFSA and for properties within 400 feet of the IFSA. In addition, the notice was posted on the first and second floors of the Tacoma Municipal Building and copies were available in the Building and Land-Use Services reception area. Finally, the notice and supporting materials could also be viewed and downloaded at the Planning Division's website (www.cityoftacoma.org/planning).

The notice included the purpose of the public hearing, information pertaining to the environmental determination, a map of the IFSA area, a summary of the proposed amendment, how and when to submit comments, and where additional information could be obtained. Advertisement of the public hearing was published in *The News Tribune* on January 28, 2009 and a legal notice of the hearing was published in *The Daily Index* on January 28, 2009.

F. COMMUNITY AND ECONOMIC DEVELOPMENT DEPARTMENT RECOMMENDATION:

Staff recommends that the Planning Commission accept all oral and written testimony and hold the record open **until 5:00 p.m. on Friday, February 13, 2009** and that the Commission evaluate all testimony given at the public hearing and any written comments received as part of the record prior to making a recommendation to the City Council.

G. ATTACHMENTS:

Attachment A –

- Proposed Amendment to TMC 13.06A.060
- Figure 1: IFSA Boundaries

Attachment B –

- Resolution No. 37508 (June 17, 2008) designating the IFSA as a special emphasis area within the Downtown Commercial Core
- Memo from the City Manager to the City Council's Environment and Public Works Committee (November 17, 2008) regarding the request to the Planning Commission to study the parking requirements in the IFSA
- Memo from the Planning Division to the Planning Commission (December 11, 2008) regarding the parking requirements for IFSA

13.06A.060 Development standards.

Development Standards Table.

Districts	Maximum Allowable Floor Area Ratio (FAR) ¹						Height Limits	Non-Res Parking ^{2, 3, 4}	
	“As of Right”		With Design Standards		With Special Features			Min	Max
	Non-Res	Res	Non-Res	Res	Non-Res	Res		(stalls/floor area sf) ⁵	
DCC	3	3	6	6	12	12	400’	2.4/1000	3.6/1000
DMU	2	3	4	5	6	7	100’	2.4/1000	3.6/1000
DR	1	2	2	4	4	6	90’	1.2/1000	3.6/1000
WR	3	4	4	5	6	7	100’	1.2/1000	3.6/1000

Notes:

- The FAR for non-residential and residential uses within a given development are individually calculated and may be added together for a cumulative total, provided that the respective maximum FAR for each use is not exceeded. For example, in the DCC, an “as-of-right” development may have a total FAR of 6, with a FAR of 3 in non-residential use and a FAR of 3 in residential use in a single development.
- For the purposes of calculating maximum allowable FAR, hotels shall be considered a residential use.
- A minimum FAR of 1 shall be achieved for structures within the Downtown Commercial Core district. The gross floor area shall be used to calculate the minimum FAR.
- Building Height will be measured consistent with the applicable Building Code, Height of Building and excludes parapets, mechanical penthouses, elevator overruns and machine rooms, and decorative architectural features (e.g., spires, towers, pergolas, pyramids, pitched roofs) not intended for residential, office or retail space.
- Maximum Building Height within 150’ east of the centerline of the right-of-way of Yakima Avenue shall be 60 feet, in order to create a transition to lower-rise residential development to the west.
- Minimum parking ratios for non-residential development located east of Market Street, or located east of Jefferson Avenue from South 21st to South 28th streets shall be reduced by 50 percent in recognition of the availability of transit.
- The first 3,000 square feet of each street level establishment is exempt from parking requirements.
- Maximum parking ratios may be exceeded for providing parking available to the public and which is not dedicated to individual owners, tenants and lessees of the building.
- Tandem parking is permitted only for residential development subject to approval of the Traffic Engineer.
- Development shall also comply with the requirements of 13.06.510(C) Loading Spaces.
- No variances shall be granted to these development standards unless otherwise indicated.
- Buildings lawfully in existence on January 10, 2000, the time of reclassification to the above districts do not need to conform to these standards; however, additions will need to conform. No addition can increase nonconformity to these standards or create new nonconformity.

13. Minimum and maximum non-residential off-street parking requirements do not apply within the International Financial Services Area (IFSA) (Figure 1); parking provision must comply with federal and state ADA regulations.

¹ The maximum allowable Floor Area Ratio may be exceeded as provided for in Section 13.06A.080.

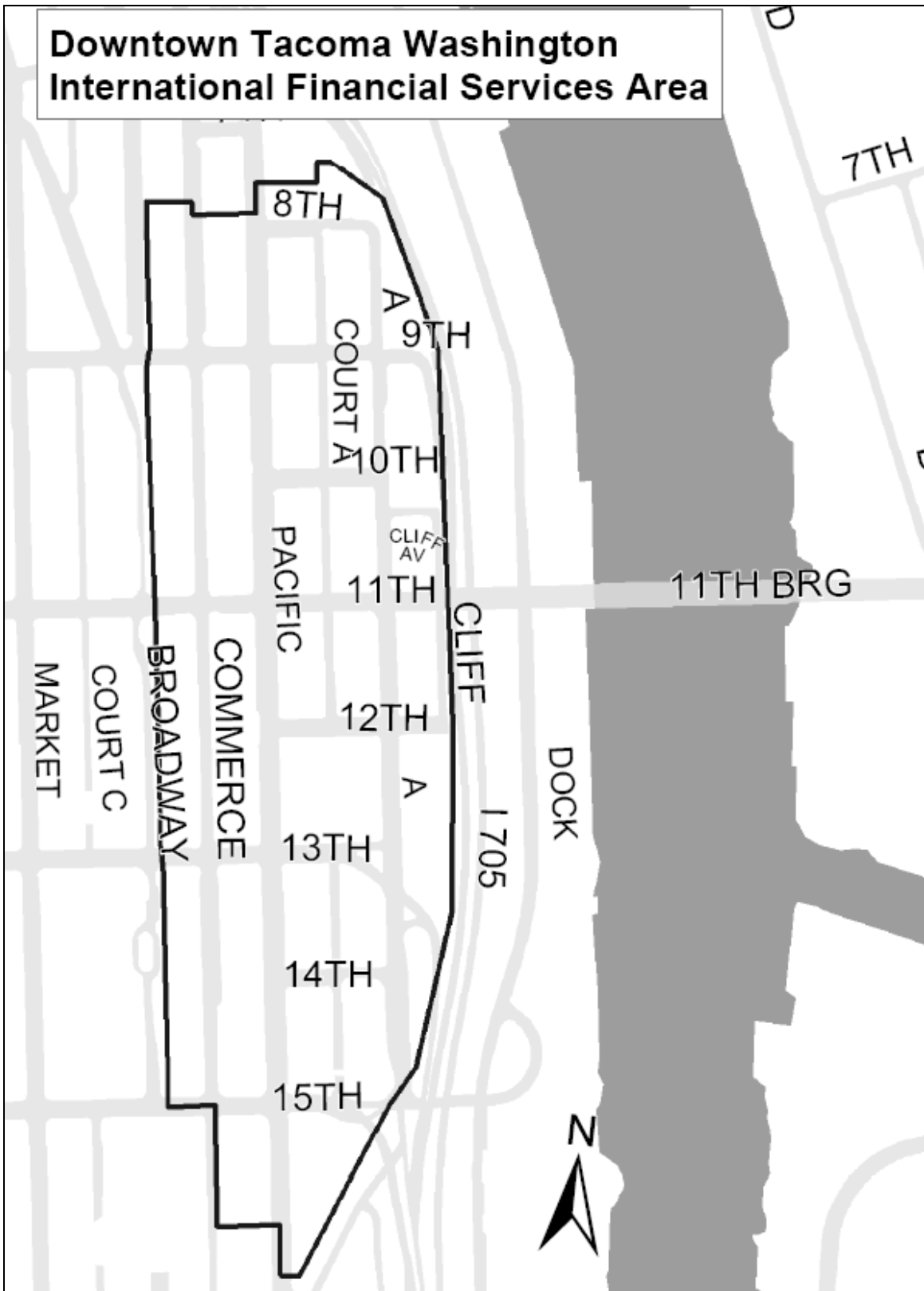
² Residential developments shall be required to provide one stall per residential unit, **except that no parking stalls will be required for residential development located within the IFSA (Figure 1); parking provision must comply with federal and state ADA regulations.** Special needs housing, including, but not limited to, seniors, assisted living, congregate care, licensed care, or group care homes may provide less than one stall per residence upon a showing that a lesser parking requirement will reasonably provide adequate parking for residents, staff, and visitors, subject to the approval of the Traffic Engineer.

³ Required parking for hotels shall be .5 stalls per room inclusive of all accessory uses.

⁴ Telecommunications exchange facilities may provide less than the required parking stalls upon a showing that a lesser parking requirement will reasonably provide adequate parking for operational, vendor, and transient service staff, subject to approval of the Traffic Engineer.

⁵ Floor area is determined pursuant to the definition provided in Section 13.06A.030(7).

FIGURE 1





RESOLUTION NO. 37508

1 A RESOLUTION relating to economic development; designating an International
 2 Financial Services Area ("IFSA") as a special emphasis area within the
 3 Downtown Commercial Core Zone; requesting the City Manager to develop
 4 and report on recommendations for the expansion, retention, and
 5 recruitment of international financial services businesses in the IFSA; and
 6 requesting the Planning Commission to evaluate existing downtown zoning
 7 regulations with the intent of facilitating international financial services
 8 business development.

9 WHEREAS, pursuant to Resolution No. 34114, adopted July 14, 1998,
 10 the City has previously designated an area of our community as an
 11 International Services Development Zone in order to, in part, encourage
 12 long-term private investments and achieve sustainability through development
 13 of support infrastructure, informal information channels, and labor pools with
 14 specific skills that meet target industry needs, and

15 WHEREAS the state of Washington recognizes the importance of
 16 encouraging the location of businesses that provide international services by,
 17 among other means, providing a tax credit for those businesses when they
 18 create new jobs in community empowerment zones, and

19 WHEREAS the International Services Development Zone above has
 20 also been designated as a community empowerment zone, and

21 WHEREAS Angelou Economics, as consultant to the City's Community
 22 and Economic Development Department on its economic development strategy
 23 for downtown Tacoma, has indicated that the International Financial Services
 24 Sector is a category of high-value employers for which downtown Tacoma
 25 enjoys strong competitive advantages, and
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WHEREAS preliminary data received by the City indicates that firms in this industry sector offer above average wages compared to other employers in the City and state; Now, Therefore,

BE IT RESOLVED BY THE COUNCIL OF THE CITY OF TACOMA:

Section 1. Definitions. For purposes of this resolution, “International Financial Services” means services such as banking, loan, security, investment management, investment advisory, mortgage servicing, contract collection, and finance-leasing services, engaged in by financial businesses, or businesses similar to or in competition with financial businesses, including insurance businesses, when those services are provided to persons domiciled outside the of United States, or the service itself is for use primarily outside of the United States.

Section 2. Findings and Conclusions. Based on reports received, copies of which are on file in the office of the City Clerk, the City Council makes the following findings and conclusions:

1. Firms in the International Financial Services sector are often located in high-rise office buildings;
2. Such office buildings and vacant sites zoned for high-rise office buildings require development regulations appropriate for same and for mixed-use buildings,
3. The Downtown Commercial Core (“DCC”) Zone in Tacoma’s downtown is within the City’s International Services Development Zone;



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- 4. The DCC regulations may contain provisions which are a barrier to facilitate desired development and need to be revised;
- 5. Firms in this sector often seek to locate in proximity to each other and to other financial and professional service firms and other support firms, as well as to retail and restaurants meeting the shopping needs of office workers;
- 6. The City has significant infrastructure in place to begin serving high-rise office development in the DCC Zone; and
- 7. That the most appropriate location where such firms might best be retained and might also expand, and to which other firms might be attracted, is in a concentrated area within the DCC zoning district.

Section 3. Area Designated. In order to encourage the expansion, retention, and recruitment of international financial services businesses within the DCC, the City Council hereby designates the following area as an International Financial Services Area ("IFSA"):

That portion of Downtown Tacoma between and defined roughly by the parcels on the north side of South 8th Street on the north to the parcels on the south side of South 15th Street on the south; and by the west side of Commerce Street on the west and I-705 on the east, along with any parcels contiguous thereto, as set forth at the map at Exhibit "A."



Section 4. Purpose and limitation on designation.

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A. The IFSA is a special emphasis area, the purpose of which is to encourage the retention, expansion, and recruitment of employers and developers of high-rise buildings for employers engaged in international financial services or in providing professional services, support services, or retail shopping and restaurant experiences for companies and employees engaged in international financial services, all to create a work environment and business climate attractive to such employers, their employees, suppliers, and customers.

B. This designation is not intended to, and does not, prohibit other types of employers, businesses, or other development from locating in this emphasis area, nor does it prohibit international financial services companies from locating elsewhere in the City.

Section 5. That the City Manager is requested to bring back to the City Council the recommendations from Angelou Economics for a Downtown Tacoma Economic Development Strategy, as well as any additional recommendations regarding steps that can be taken and policy choices that can be considered that would help Tacoma to grow its international financial services industry.

Section 6. That the City Council intends to request that the Planning Commission evaluate the DCC zoning regulations, including, but not limited to, maximum allowable building height, floor area ratios, off-street parking requirements and design standards, conduct a public hearing, and recommend



changes to the DCC regulations that would remove impediments which may impair the retention, recruitment, and expansion of the international services sector within the IFSA, as designated in Section 3.

JUN 17 2008

Adopted _____

Mayor

Attest:

City Clerk

Approved as to form:


Assistant City Attorney

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City of Tacoma
City Manager

November 17, 2008

TO: Jake Fey, Chair, Environment and Public Works Committee
FROM: Eric A. Anderson, City Manager 
SUBJECT: Request to the Planning Commission

In the fall of 2007 I provided recommendations to Council on a city center parking and mobility strategy. As part of that strategy and the subsequent recommendations, I request that the Environment and Public Works Committee make a request of the Planning Commission to analyze the impact of and provide a recommendation to the City Council on the elimination of all parking requirements in the International Financial Services Area (IFSA).

cc:
Tacoma City Council
Ryan Petty
Peter Huffman



City of Tacoma
Community and Economic Development Department

Agenda Item
GB-2

TO: Planning Commission

FROM: Peter Huffman, Manager, Planning Division

SUBJECT: Parking Requirements for International Financial Services Area

DATE: December 11, 2008

The City Council adopted Resolution No. 37508 on June 17, 2008, designating an International Financial Services Area (IFSA) as a special emphasis area within the Downtown Commercial Core (DCC) Zone, to encourage the expansion, retention and recruitment of international financial services businesses within the designated area. The resolution also requested the Planning Commission to evaluate, and recommend necessary changes to, zoning regulations to help accomplish the intent of the IFSA designation.

The IFSA is identified in the new Downtown Element of the Comprehensive Plan as a priority development area. The new Plan also includes a section to address parking management. The Commission may recall that based on public testimony, a new policy was added to move the City toward a market based approach for parking requirements in certain areas of the downtown.

The City Council's Environment and Public Works Committee, at the request of the City Manager, agreed to refer a proposal to eliminate the parking requirements within the IFSA for review and study by the Planning Commission. At your meeting, staff will facilitate the Commissioners' review and discussion of the proposal as a pilot project to test a market based approach for parking. The Commission has repeatedly heard that the parking requirement is an impediment to downtown private investment. The IFSA appears to be an area where the elimination of parking requirements could be tested because of the relatively few residences compared to the predominance of commercial/office uses.

The intent is to modify the parking requirement as the first implementation step of the Downtown Plan and move toward implementation of the City Manager's mobility and parking strategy. Attached is a memorandum from the City Manager suggesting the evaluation by the Planning Commission, which was approved by the Environment and Public Works Committee at their meeting on December 10, a map depicting the IFSA boundary, an excerpt of the existing downtown zoning code pertaining to parking requirements, and a copy of Resolution No. 37508.

If you have any questions, please contact Peter Huffman 591-5373 or phuffman@cityoftacoma.org.

PH:ds

Attachments (4)