

**Tacoma, WA.
April, 2008**

**Tacoma City Council, North End Neighborhood Council, Tacoma
Planning Commission, Tacoma City Manager, City of Tacoma
Community and Economic Development Department:**

As owners of small businesses and/or properties in Tacoma's historic Proctor district we would like to comment on the **MIXED USE CENTER RECOMMENDATIONS** as they would impact the Proctor NCX district. We ask that our recommendations and requests be adopted by the Planning Commission and, eventually, by the Tacoma City Council.

In order to encourage 'walkable communities', create economically viable 'urban villages' and retain small, family owned businesses as part of a vibrant urban mix it is imperative that we offer the most creative and reasonable solutions to serious concerns that confront our small business community in Tacoma.

In order to survive as viable businesses in today's retail and service sector business climate we know that it is necessary for all businesses in the Proctor NCX district to build a consistent and growing customer base. As business and/or property owners we believe that part of the process necessary to secure that customer base is to **1)** creatively increase parking options while also removing off-street parking requirements, **2)** maintain the Multi-Family Housing Tax Incentive in its current form, **3)** increase maximum height in accordance with ABHL recommendations to make mixed use and multi-family development possible and **4)** encourage livable community options with bonuses.

1) PARKING:

AHBL Consultants recommend the removal of off-street parking requirements to infill mixed use centers. It is important to offer parking alternatives to business patrons lest the economic viability of businesses suffers. We are in agreement with the City Staff Proposal to have more "flexible" off-street parking regulations. The majority of the customer base of many of our businesses often comes via automobile from a distance. If we truly want to retain privately owned businesses that give character to our NCX districts some consideration of off-street parking should be encouraged. We feel it is very important to encourage angle parking options both on main streets and on side streets. We have successful models of both in the Stadium district and in Proctor. We need to add additional angle parking. Business owners and the management of the Proctor Farmers Market have already expressed their need for angle parking along side streets.

2) MULTI-FAMILY HOUSING TAX INCENTIVE

We agree with our NENC in relation to the Multi-Family Housing Tax Incentive offered by the state to comply with GMA guidelines. Proctor and many other NCX districts in Tacoma have been eligible for this tax incentive for nearly 10 years and still very few housing units have been built in NCX districts throughout the city taking advantage of the tax incentive. We have to ask ourselves the question, 'Why?' Recently, the state legislature offered an option that would encourage the inclusion of 20% affordable housing units in each project. This is exactly the encouragement that Proctor and other NCX districts need and want. It is important to point out that despite what might be the commonly held belief, all 34 apartments in the Proctor district, at the present time, are in the 'affordable housing' category. If we encourage the construction of more housing units we can do exactly what the NENC recommends and the state encourages, "reduce sprawl, reduce car reliance, traffic congestion and revitalize mixed use centers".

3) INCREASE MAXIMUM HEIGHT PERMITTED:

AHBL Consultants recommends an increase to a maximum height permitted, 65'. This, we believe, is key to the creation of a 'feet on the street' mentality as espoused by Jane Jacobs and other highly respected contemporary city planners. Don't go 'out', we are encouraged. Go 'up'. It is imperative to provide opportunities for mixed use housing within the boundaries of the Proctor NCX business district as has been done in countless communities across the country. Multi-family housing should not flow into single family neighborhoods but should be encouraged by allowing new height standards with reasonable setbacks for properties on the edge of business districts. Even though the Multi-Family State Tax Incentive has been in effect for almost ten years, Proctor has had no new multi-family housing built in the district for over 47 years. It is simply not economically feasible to build anything other than single or two story buildings or townhouses under the present height restrictions.

Many of Proctor's commercial properties are adjacent to either of two schools, a church or our library which act as buffers between potential multi-family development and single family housing. We respect our NENC greatly, but we must respectfully disagree with their assertion that "nearly every commercial parcel in Proctor is on the border of residential properties." That, simply, is not true. We feel it is important to point out that, in fact, very few commercial properties on either N. Proctor or N. 26th abut single family residential.

AHBL's 65' is a reasonable option and one which might possibly allow for the construction of buildings with two floors of housing, one or two of commercial and one of retail/restaurant with green building options on the roof. All floors are not the same height. A 45' limit does NOT allow creative possibilities that can be either realistically or financially achieved. We strongly favor AHBL's recommendations.

4) BONUS OPTIONS:

In relation to Bonuses and "open space" issues, the city staff proposal is right on the mark. Sometimes it is necessary to 'gently encourage' in relation to building livable communities. When certain design criteria are met, e.g., a water feature, open space, green building options, public art, etc., the community reaps the benefits. The city staff recommendation to offer density bonuses when certain design criteria are met should be heeded.

Finally, as small, family owned businesses and/or property owners, we know that it is important for our city that we not only survive but thrive. 'Economic Gardening', as espoused and encouraged by the Community and Economic Development Department of the City of Tacoma, reminds us that entrepreneurs drive economies. CEED reminds us that healthy communities have a healthy base of entrepreneurs. In order for our businesses to prosper, our customers must have reasonable parking options and, at the same time, we must allow an increase in building height in order to create more housing opportunities for a 'local customer base' to develop.

Please listen carefully to those of us trying to survive in small business within the context of our NCX districts. Our Proctor district has suffered the loss of four retail businesses in the last several years. In the context of Mixed Use Center Review please do not separate Proctor from other NCX districts throughout our city. We are the ones who have put in our time and economic resources to help develop a successful business model for our urban business districts. We now need your help to 1) creatively increase parking while also removing off-street parking requirements, 2) Maintain the Multi-Family Tax Incentive in its current form with no revisions, 3) increase maximum height in accordance with AHBL recommendations to make mixed use, affordable housing and multi-family development possible and 4) encourage livable community options with bonuses.

Thank you very much for your consideration.

Sincerely,

Cherlyn Pijanowski, President, Board of Directors, Blue Mouse Theatre

Jack Andersen, Owner, C.J. Andersen, Inc.

Willy Ceria, Owner, La Fondita Restaurant

Christy Glasgow, Owner, Carpe Diem

Bruce Larson, Proctor Farmers Market

Jason Kjellesvik, Owner, JK Real Estate Group

Bill LaVergne, Manager, American Cancer Society Store

Sue Evans, Manager, Blue Mouse Theatre

Katherine Gullette, Proctor resident

Kathleen Valentine, Owner, Art & Soul

Adam Wojtanowicz, Proctor district resident

Ann Evans, Owner, the Old House Mercantile

Mark Bleckert, Owner, the Old House Café

William Mueller, Co-Owner, Babblin' Babs Bistro

Danette Knowles, Owner, Wag Pet Store

Lidia Ceria, Owner, La Fondita Restaurant

Madaline Thorpe, Owner, Windmill Garden

George Bourcier, Owner, Tacoma Trains & Hobbies

Pam Lindgren, Broker, Better Properties

Eve Hewitt, Owner, Capers Take Home

Julia Schmidtke, Owner, Julia Ellen Fine Clothing

Markeen Tower, Owner, Pomodoro Restaurant

Sandy Colombini, Manager, Pacific Northwest Shop

Dr. George Keough, Owner, Proctor Chiropractic

Jeremy Scovronski, Proctor resident

Shannon Mueller, Co-Owner, Babblin' Babs Bistro

Bill Evans, Owner, Pacific Northwest Shop

Mark Hulen, Owner, Better Properties, Inc.

Erling Kuester, Principal, Proctor Partners, LLC.

Linda Schatz, Manager, Julia Ellen

Claudia Young, Broker, JK Real Estate Group

Robert Huff, Owner, Huff Jewelers

Julie Hibbard, Owner, Julie's Hair Care

Gail Ford, Asst. Manager, Julia Ellen

Jonathan White, LaFondita, LLC

Melissa Tennille, Co-Owner, Teaching Toys

Karl Roggasch, Proctor district resident

Loretta Macha, Owner, Davies Apartments

Victoria Olson, Broker, Better Properties

Linda Ranch, Manager, Old House Mercantile

Fred Davie, Owner, Backstage Video

From: Erik Bjornson [mailto:Ebjornson@msn.com]

Sent: Thursday, May 01, 2008 10:54 PM

To: eric.Anderson@cityoftacoma.org; rteasley@cityoftacoma.org; Petty, Ryan; Gwendolyn.Voelpel@cityoftacoma.org; manderso@wiredcityusa.com; Levin, Robert

Subject: Proctor Merchants on Mixed Use Centers

City Manager Anderson,

Attached is the Proctor Merchant position on the Tacoma Mixed Use Centers.

Similar to the NENC, they understand that the off-street parking requirement should be removed and parking be built pursuant to market demand. Thus, the off-street parking issue is resolved in the North End by all factions I see. This is also the recommendation by the local architect division (AIA) for Tacoma and Pierce County.

Thus, I am pleased to see that everyone is on board on this critical urban design issue in the North End which has critically analyzed the issue. The recommendations of the NENC, Proctor Merchants and the AIA also reflects the "best practices" for urban design in the peer reviewed literature.

Thus, with 1) "best practices," 2) community support, and 3) comparative cities letting the market determine the amount of parking in urban areas, it is vital that Tacoma move from a 1960 suburban design, remove the off-street parking requirement as other cities have. Many of the mixed use centers are blighted with uncountable numbers of blighted and empty lots where it is difficult to build anything and it is not practical in most areas to build parking underground.

Adopting a urban design code will help develop these areas to reduce crime. So long as the urban areas are vacant and blighted, they are going remain magnets for crime.

As you and I have discussed, this is a natural method to create affordable housing which integrates with the neighborhood without any government expenditure or oversight. The City of Tacoma's off-street parking requirement has been a barrier to the creation of affordable housing now for many years. Hence, very very few commercial properties have had housing built above them for the last 40 years.

The studies on the connection between affordability and off-street parking requirements is overwhelming, and thus, one of the reasons other urban cities have long since update their building code such as Seattle, San Francisco, Portland and Bellingham.

This will also allow Proctor and other mixed use centers to also finally fill in vacant blighted lots with appropriate buildings.

The only difference is that the merchants and property owners desire greater height than the NENC. I think this issue may be resolved by the proposed buffer which keeps a more strict height requirement within a certain distance of residential zoning. The strongest legitimate argument on height is that no one wants their house to be immediately adjacent to a tall building.

Take care,
Sincerely,

Law Office of Erik Bjornson
Ebjornson@msn.com
711 Court A Suite 114
Tacoma, WA 98402
www.tacomaattorney.com

From: tizfor@hotmail.com on behalf of ramie pierce [rpierce@cnc-tacoma.com]

Sent: Thursday, May 08, 2008 7:52 PM

To: Planning

Subject: Building Height Considerations-Feedback

Last week there was a presentation to the Central Neighborhood Council and I wanted to send in my comments about the information, sorry this is a little late-spring has been very busy for me!

About the Bonus Program Palette, I like the idea more that a fixed amount of features be required to obtain so many feet...for instance, 5 features must be selected (perhaps one from each category or so) in order to achieve 5 or 10 ft. I also think some of the features should be standard, but I suppose I am not the only one who feels that way.

For the public plaza feature, I think landscaping should be a required element in plazas, with trees required-not just shrubs or grass.

For the vegetation, I think the bonus height amount isn't high enough or some of this should be required. I also think new plans (landscape) should be evaluated by an urban forester or other landscape specialist-someone who knows how plants behave in an urban setting and will know if the wrong plants are being used.

Ok-that's all I can remember!

Cheers,
Ramie Pierce

...to being alive, appreciating it, and recognizing the greatness and beauty amongst which we live.



South Tacoma Business District Association

Bruce Petersen, President

PO Box 9445 - Tacoma WA 98490-0445

Phone: 253-475-5676 Fax: 253-472-3364

www.southtacomabusinessdistrict.com

RECEIVED

JUN 02 2008

Per.....

May 14, 2008

Thomas Smith, Chair
Planning Commission
747 Market Street, Room 1036
Tacoma WA 98402-3793

Board Members,

The South Tacoma Business District Association Executive Board has unanimously passed a recommendation to the Planning Commission to consider this proposal. The STBDA believes that the existing and proposed building heights in our NCX area are not adequate for the economic potential of this area. The image that has been proposed of a *New England or European streetscape* would be appropriate for several of the cities NCX areas, but South Tacoma is unique in history and character. The industrial history of this area still permeates.

This area may be one of just a few areas that the building heights can go substantially higher without encroaching into the surrounding neighborhood. The Sounder mass transit station currently under construction will give the area the ability to serve a much higher density population. The BNSF property abutting this area is also in the process of re-development with a proposed 1.9M Sq. Ft. of distribution / manufacturing center. The need for office, apartments, condos and storefronts to support that development (and any other development that may spin off from that) is very real.

The height bonus features seem to be wisely chosen and they would be a welcome addition to any re-development of our area. Our proposal would use the "height bonus features" as a tool for the upgrading of any taller building development. Our recommendations are as follows:

- South Tacoma Way East to the alley the Base Height should be 65' with a maximum height of 85' (with bonus features). From the East alley to Puget Sound, the base height should be 45' with a maximum height of 65' (with bonus features).
- South Tacoma Way West, the Base Height should be 65' with a maximum height of 185' (with bonus features). This transition in height would compliment the height limits to the M2 Zoned area to the West and would cause little if any encroachment into the neighborhood.

We have an opportunity to send a message that this area is ripe for re-development in a way that developers may see real potential here that can pencil out for them and be a boon for the city and we see no downside to this proposal. This change would compliment and enhance the new mass transit station and the BNSF re-development and would satisfy the mandates of the GMA.

South Tacoma Business District Executive Board

Bruce Petersen, President

From: RCrane [mailto:roland.crane@gmail.com]
Sent: Tuesday, May 20, 2008 5:39 PM
Subject: 8th & I Neighbors > NRX rezone

Dear City of Tacoma,

I am writing this email as a representative of the 8th & I Street Neighbors, a community group.

We support your recommendation to the Planning Commission to create and implement the new NRX zoning definition in our area, roughly from 6th to South 9th, and from the alley between South J Street and MLK down to Yakima (see attached map).

This zoning definition and the area it applies to have the support of our group, and the following groups:

- New Tacoma Neighborhood Council - Board Resolution
- Central Neighborhood Council - Board Resolution
- Upper Tacoma Business Association - Board Resolution
- Hilltop Action Coalition - Support of Jeanie Peterson, Director of Community Initiatives

The proposed zoning, as defined, will cover an area that is already conforming. We believe this zoning will recognize the actual path of development that has taken place since the previous zoning was established many years ago. The actual path of development has not been consistent with the zoning, hence our support for this change.

We now have a walkable urban neighborhood, near the heart of Tacoma, that if the development path envisioned by this zoning is followed, will help support the continued creation of a jewel of an urban neighborhood in Tacoma. In the last decade, this area has seen the development of:

- Townhomes (row houses);
- Duplexes;
- Rehabbing of historic, dense, single family housing;
- The creation of a new family-oriented neighborhood park that has been an outstanding success, including a very actively used community garden, and;
- Street development at South I Street & Yakima that has successfully quieted traffic in the area, and added public art to the neighborhood.

This neighborhood has also seen a profound reduction in crime. Twenty years ago, 8th & I was recognized as one of the most dangerous areas in the entire State of Washington. Today, it is one of the safest neighborhoods in the City. This has been the result of a model collaboration between the people in the neighborhood and the City. It is a profound achievement in urban renewal and is testament to the efforts of the people who live here and the dedicated efforts of the City.

We believe this significant investment, both private and by the City, and in money, effort, and time, should be recognized for what it has created, and for the future potential. We envision a neighborhood that continues to support low-income housing, group homes and rental stock, while encouraging the development of dense and attractive market-rate housing.

Please note that there may be some small differences between our map and what you recommend. We strong urge City staff to consider:

- Including the properties between on South I Street down to 6th Ave in our neighborhood, as there is no realistic future for these properties to become commercial: the row houses facing 6th were just built, and the properties south of that do not have any space for parking, as Yakima is all "no parking". Also, all this inventory conforms to the new zoning and is part of the neighborhood;
- Including the "Hope House" property on the northeast corner of South 7th & J Streets. This property also conforms, and the home is well cared for and has historic value;
- Including the properties on the west side of South J Street right up to the empty lot parcel at the corner of South 9th & J Streets. Again, this existing inventory is conforming and really is part of the neighborhood.

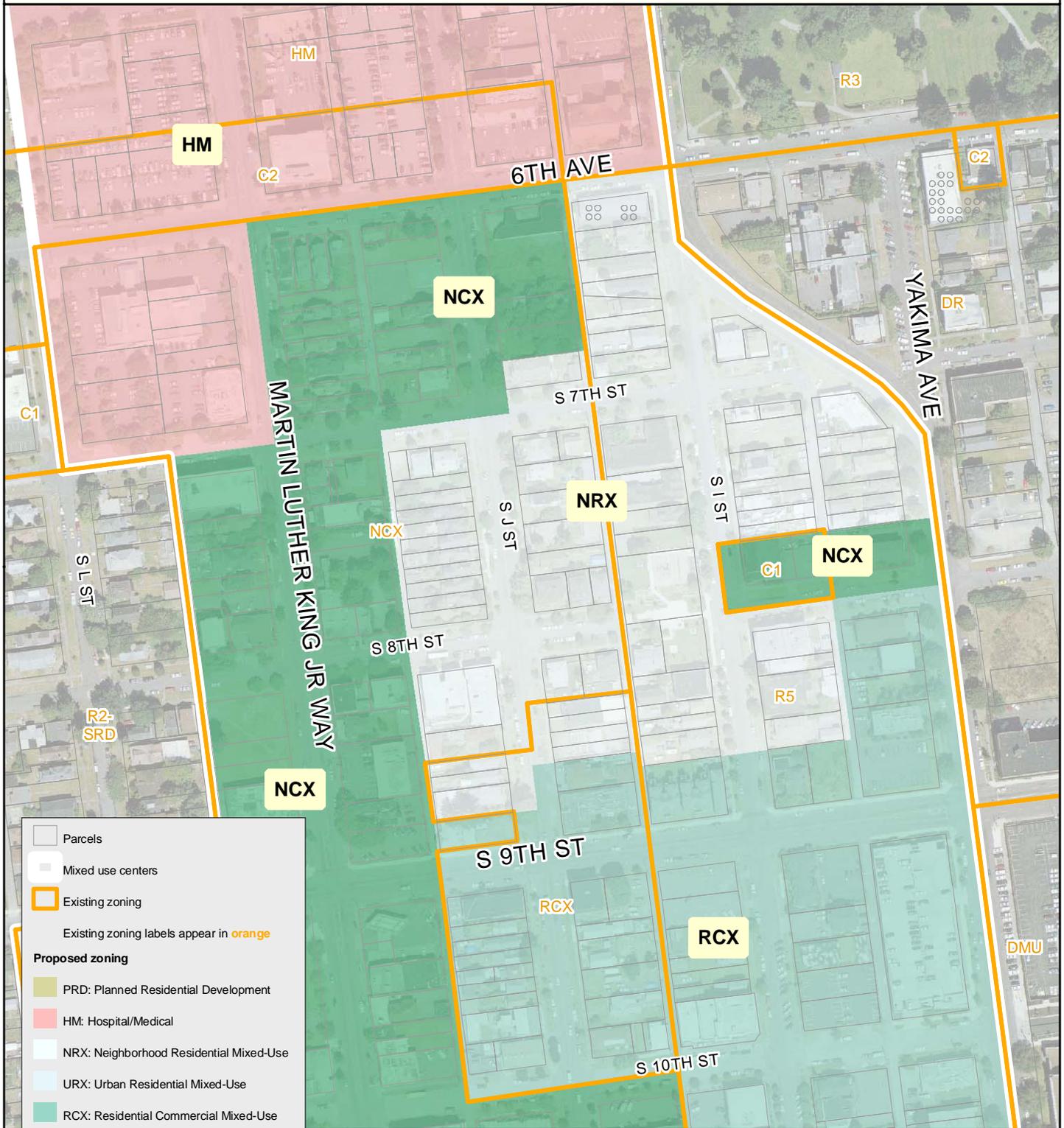
We are prepared to bring a significant number of people to any public hearing in support of these plans. There is broad support within the designated area for this zoning change.

Thank you for all the work you have put into this Mixed-Use Center wide rezone. We appreciate it.

--

Roland Crane

Martin Luther King Proposed Zoning



- Parcels
- Mixed use centers
- Existing zoning
Existing zoning labels appear in orange
- Proposed zoning**
- PRD: Planned Residential Development
- HM: Hospital/Medical
- NRX: Neighborhood Residential Mixed-Use
- URX: Urban Residential Mixed-Use
- RCX: Residential Commercial Mixed-Use
- NCX: Neighborhood Commercial Mixed-Use
- CCX: Community Commercial Mixed-Use
- UCX: Urban Center Mixed-Use
- CIX: Commercial Industrial Mixed-Use
- M1: Light Industrial



0 200 400
Feet

Map is for reference only.



May 21, 2008

Thomas Smith, Chair
City of Tacoma
Planning Commission
747 Market Street-Suite 1036
Tacoma, WA 98402

Dear Commission Chair:

Over the past year the Upper Tacoma Business Association (UTBA) has been involved in discussing the proposed height, zoning, and other proposed changes to the MLK Mixed Use Center (MUC). We understand that this has been a contentious issue at times. We commend the City of Tacoma for taking this opportunity to bring our community into the 21st century. As a result of an opinion poll of the UTBA membership, we offer the following recommendation for the MLK MUC.

1. For the areas designated as MLK North and Central, we are of the opinion that a NCX zoning code should be applied over the entire area (with exception to the hospital zone and the 8th and I neighbors) and have a base height of 65' and a maximum height of 85' with the bonus features concept that will be of significant benefit to the community.
2. For the area designated as MLK South, we are of the opinion that a NCX zoning code should be applied for blocks 19th - 23rd streets MLK and J Street (with exception to the hospital zone). These streets should have a base height of 45', be included in the bonus program and have a maximum height of 60' with the remaining areas following AHBL's recommendations (consulting firm).

While there are many other issues involved in the MUC Review that could have been addressed (e.g., parking, design features), we have determined that heights and proper zoning classifications were the most important issues that should be focused on with our time limitations.

Thank you for your consideration of our opinion for the MLK MUC and we wish you all the best with the final decision. If you have any questions regarding these recommendations, please feel free to contact me at (253)-759-0852 or e-mail at w.h.james@comcast.net.

Respectfully,

William James, President
Upper Tacoma Business Association

cc: UTBA Membership

Dear City of Tacoma Planning Commissioners,

My name is Eric Crittendon and I represent my family's personal and nonprofit interest in some real estate inside the south end of the MLK Mixed Use Center. The combined sq ft of the personally held property equals nearly 1 acre or approx 39000 sq ft fronting on MLK. Back in 2005 we started checking to the possibility of developing one particular part of this property at the corner of 23rd and MLK which was home to our family's auto body business. To make a long story short although the property was inside the muc the C-1 zoning just made it too difficult to develop the type of mixed use structure we have envisioned.

Fast forward to May 2008 and I have been in contact with several developers that would love to do something great for this neighborhood but without the appropriate changes to the zoning these visions may never be realized. I am writing this letter to ask that as part the muc review an NCX zoning be place over blocks 19th-23rd on the east side of MLK and all of Jst excluding the hospital zone. We feel the height for this portion should be 45'/60' with the bonus features determined to be of great benefit to the community. We ask that a 45' max height be applied to the west side of MLK to control the shadowing effect to the single family homes directly across the alley. I have been consistently involved with the neighbors in this immediate community and feel that I am responsibly recommending what myself and the majority of property owners in these blocks feel would truly give the most infamous neighborhood in Tacoma a chance at a new and Historic life.

Sincerely,

Eric Crittendon
255-222-4549

Representing properties at:

2108 MLK
2121 MLK
2124 MLK
2136 MLK
2143-45 MLK
2147 MLK
2151 MLK
2155 MLK

Received May 25, 2008

From: Eric Crittendon [mailto:ericcrittendon@johnlscott.com]

Sent: Saturday, May 31, 2008 11:53 AM

To: smithtmore@aol.com

Cc: lwalker2@cityoftacoma.org; julie.anderson@cityoftacoma.org;
mstrickland@cityoftacoma.org; dstenger@cityoftacoma.org; bbaarsma@cityoftacoma.org;
eric.anderson@cityoftacoma.org

Subject: FW: MLK Mixed-Use

Commissioner Smith,

Although I have already sent my comments concerning the MLK South portion, I wanted to forward a copy of our revised interior concept floor plan for what would be a catalyst mixed-use project at the corner of 23rd and MLK if the zoning is adopted as needed. In the last several days after reading the presentation that was made to the commission there was one concern that I saw that I feel I need to address. This would be the comment that by allowing the southern end of the MLK corridor to become vibrant by having an NCX zoning that this might conceivably take away from what (by whom I don't know) is to be called the core of the center. I question this reasoning for several reasons.

1. Discriminatory

2. The southern portion of the corridor essentially is a great distance from what is labeled as the core and there are a great number of new townhomes (i.e. McCarver Village, City Steps etc) and single family homes that greatly need neighborhood commercial services on this end of the corridor.

3. The southern end is located next to St Josephs Hospital, McCarver Elementary and again could be greatly served with access to daily retail/service businesses.

We see the southern end of the corridor nearly as an extension of the center and visualize this as a McCarver District if you will. Please reject the notion that by allowing this area to prosper will somehow diminish the significance of the core.

Thanks

Eric Crittendon

John L Scott Real Estate

Tacoma North

Office #253-752-1025

cell # 253-222-4549

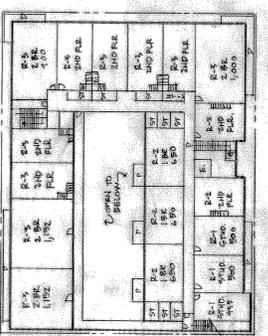
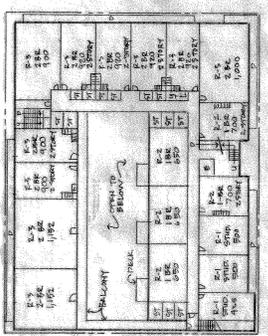
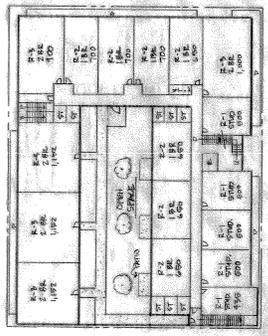
Fax # 253-759-8033

www.Tacomaurbandigs.com

mark	date	description

phase: **SCHEMATIC**
 date: **05.29.08**
 owner:

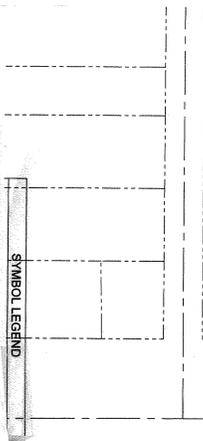
project: **MILK PLACE MIXED-USE**
 214 EAST 23RD STREET
 TACOMA, WASHINGTON



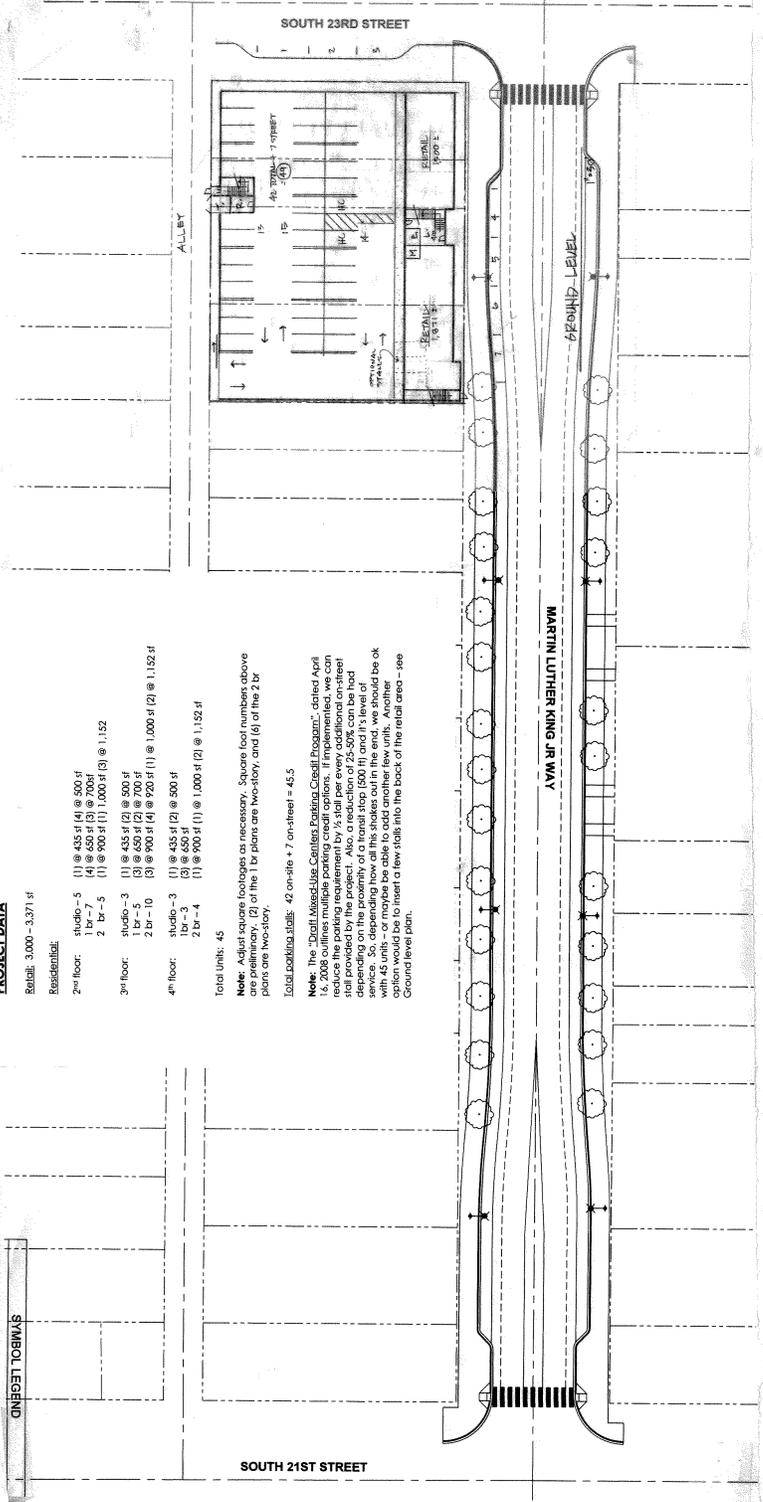
PROJECT DATA

Build: 3,000 - 3,371 sf
 Residential:
 2nd floor: studio 5 (1) @ 455 sf (4) @ 900 sf
 2 br - 5 (1) @ 900 sf (1) @ 1,000 sf (2) @ 1,152 sf
 3rd floor: studio 3 (1) @ 455 sf (2) @ 900 sf
 2 br - 10 (3) @ 900 sf (4) @ 920 sf (1) @ 1,000 sf (2) @ 1,152 sf
 4th floor: studio 3 (1) @ 455 sf (2) @ 900 sf
 2 br - 4 (1) @ 900 sf (1) @ 1,000 sf (2) @ 1,152 sf

Total Units: 45
Note: Adjust square footages as necessary. Square foot numbers above are preliminary. (2) of the 1 br plans are two-story, and (6) of the 2 br plans are two-story.
 Total parking stalls: 42 on-site + 7 on-street = 49
Note: The "Draft Mixed-Use Codes, Parking, Credit Programs" - Section 4 April 16, 2008 outlines multiple parking credit options. If implemented, we will reduce the parking requirement by 1/3 stall per every additional on-street stall provided by the project. Also, a reduction of 25-50% can be had if the project is able to provide a certain level of transit service. So, depending how all this shakes out in the end, we should be ok with 45 units - or maybe be able to add another few units. Another option would be to insert a few stalls into the back of the retail area - see Ground level plan.



SOUTH 21ST STREET



sheet title:
 sheet number:



Waterstreet
OFTS

1601

COMAL AVENUE

From: Jacquie Hackett [mailto:wajacquie@yahoo.com]
Sent: Friday, May 30, 2008 11:47 AM
To: bboudet@cityoftacoma.org
Subject: Mixed use centers

I was looking at the drawings for the mixed use heights. My first reaction was, oh, ugly. My second was that that doesn't look like Tacoma, Proctor or any of our business districts. It looks like Northgate in Seattle. Not attractive. Please consider my comments!

Jacquie Hackett
930 South Cushman Ave
Tacoma, WA

253-383-3873

From: Chris Karnes [mailto:chris.tacoma@gmail.com]
Sent: Sunday, June 01, 2008 2:39 AM
To: dstenger@cityoftacoma.org
Subject: Mixed Use Center height limits / parking requirements

Hi Donna-

I just read Dan Voelpel's latest article in the paper and I must say that I concur with him 100%. The dialog in Tacoma about height limits and parking requirements is too constrained if you think about what kind of requirements the PSRC and the GMA have set for us. We need to go to at least 85 ft in the mixed use centers and perhaps up to 120-145 with the bonuses.

We also need to talk about completely eliminating parking requirements from new development and setting minimum building heights and floor area ratios. These are all standard practice nowadays in urban environments, especially in progressive west coast cities. If the public is resistant to these ideas, they need to be informed about the nature of the development pressure that exists and they need to be educated in relation to how large mixed use buildings can be made economic for developers.

The vast majority of Tacoma's residents want compact mixed use development. Don't let a few nimbyists stand in the way of that vision.

Chris Karnes
Urban Studies, UW Tacoma

From: Vest, Becky [Becky.Vest@progressive-solutions.com]
Sent: Tuesday, June 03, 2008 5:27 PM
To: dstenger@cityoftacoma.org; bboudet@cityoftacoma.org
Cc: Parks, Steve
Subject: Building heights on MLK - Hilltop area - NO to 85' - please!!!

Dear Donna and Brian,

This is make our opinion known about the proposed 85' building heights on MLK and 11th. We are Hilltop residents and have participated in make our area cleaner and a better place to live. We love this area and have great hopes to see it continue to become a community that we can all be proud of. Many people have put in long hours of work to forward this movement.

The presentation about 'Great Streets' with the proposal of 45' with 20' add-ons was very impressive. The buildings were very open and inviting as a living environment, not over powering. How could a building of 85' feet offer the same community feeling? Is there also a 20' add-on option which would take it to 105'?

We strongly object to this for the following reasons:

1. Tall buildings are usually less inviting and gives the community a feeling of being in a fortress to be buffered from the outside. It will be less inviting for people who want to live in a community, and the surrounding community won't have as much association with it.
2. The fact that they are top of the hill instead of on the side of the hill will make them appear even more forbidding. It will change the skyline of Tacoma and the small quaint city feel. The stadium district is build on the side of the hill, therefore it doesn't appear so ominous.
3. The heights of the buildings will reduce the housing value of the surrounding community. A lot of our houses have a nice view, it feels like a community. With this building height, we will only see tall buildings. Resale value of our properties will go down.
4. The added space in the buildings will increase the traffic in the area. Where will the parking be?
5. Currently, there is no added space for parks or community areas which is ALL the more important to balance against the tall buildings. If we can't win on the building heights, this should be a necessary addition.

Please consider our request and all the others who are currently residents in the Hill Top area. Please feel free to contact me if there is anything I can help with to keep the building heights at 45'

Sincerely,

Steve and Becky Parks
1622 S M
253-732-0190

From: Vest, Becky [mailto:Becky.Vest@progressive-solutions.com]
Sent: Tuesday, June 03, 2008 5:27 PM
To: dstenger@cityoftacoma.org; bboudet@cityoftacoma.org
Cc: Parks, Steve
Subject: Building heights on MLK - Hilltop area - NO to 85' - please!!!

Dear Donna and Brian,

This is make our opinion known about the proposed 85' building heights on MLK and 11th. We are Hilltop residents and have participated in make our area cleaner and a better place to live. We love this area and have great hopes to see it continue to become a community that we can all be proud of. Many people have put in long hours of work to forward this movement.

The presentation about 'Great Streets' with the proposal of 45' with 20' add-ons was very impressive. The buildings were very open and inviting as a living environment, not over powering. How could a building of 85' feet offer the same community feeling? Is there also a 20' add-on option which would take it to 105'?

We strongly object to this for the following reasons:

1. Tall buildings are usually less inviting and gives the community a feeling of being in a fortress to be buffered from the outside. It will be less inviting for people who want to live in a community, and the surrounding community won't have as much association with it.
2. The fact that they are top of the hill instead of on the side of the hill will make them appear even more forbidding. It will change the skyline of Tacoma and the small quaint city feel. The stadium district is build on the side of the hill, therefore it doesn't appear so ominous.
3. The heights of the buildings will reduce the housing value of the surrounding community. A lot of our houses have a nice view, it feels like a community. With this building height, we will only see tall buildings. Resale value of our properties will go down.
4. The added space in the buildings will increase the traffic in the area. Where will the parking be?
5. Currently, there is no added space for parks or community areas which is ALL the more important to balance against the tall buildings. If we can't win on the building heights, this should be a necessary addition.

Please consider our request and all the others who are currently residents in the Hill Top area. Please feel free to contact me if there is anything I can help with to keep the building heights at 45'

Sincerely,

Steve and Becky Parks
1622 S M
253-732-0190

North End Neighborhood Council

MIXED USE CENTER RECOMMENDATIONS

Dated July 7, 2007

SUBMITTED TO : Tacoma Planning Commission,
Tacoma City Council,
City of Tacoma Building and Land Use Services,
Tacoma City Manager Eric Anderson*

*Enclosed is the North End Neighborhood position on the mixed use centers including Proctor, the western portion of Stadium, and the north portion of 6th Avenue¹. The recommendations reflect the position of the North End Neighborhood residents through the North End Neighborhood Council (NENC) and utilize many of the policy goals enumerated by the Tacoma City Council. The NENC believes the enclosed recommendations incorporate the best methodologies available in urban planning to create a pedestrian friendly “urban village” type design in the mixed use centers. In short, the NENC agrees with many recommendations of Tacoma consultant AHBL, Inc. such as removing the off-street parking requirement in NCX, CCX and UCX zones. This action would allow and encourage appropriate infilling and a higher density pedestrian friendly urban form rather than the sprawlsh car centric building and zoning code currently in place. However, because of the immediate proximity of the commercial parcels to single family homes, the NENC concludes that the current maximum height limit of 45 feet in Proctor is appropriate². **The NENC requests that the enclosed recommendations be implemented as part of the Mixed Use Center revision.***

* Copies of the enclosed *NENC Mixed Use Center Recommendations* were also delivered to Tacoma Mayor Bill Baarsma, Tacoma City Council members, City Manager Eric Anderson, AHBL, Inc. and Tacoma Neighborhood Councils.

¹ Although the North End only covers three of Tacoma’s mixed use centers, the other mixed use centers may be benefited by the enclosed analysis as well, especially the smaller ones.

² The current allowable height in Proctor is 45 feet which is three and a half stories. With the removal of the off-street parking requirement, the NENC expects significant development will occur as many buildings are only one story, none are higher than 2 stories and there remain numerous surface level parking lots in Proctor, Stadium and 6th Avenue.

I. Introduction:

The City of Tacoma is currently reviewing a number of policies concerning its 14 mixed use centers including off-street parking requirements, parking management, urban design issues, permissible building heights and the multifamily tax incentive program. The North End Neighborhood encompasses three mixed use centers in its area : Proctor, the northern portion of 6th Avenue, and the western portion of the Stadium District.

The Tacoma City Council recently retained consulting firm ABHL, Inc. which presented the *City of Tacoma Mixed Use Center Analysis* to the Tacoma Planning Commission on June 6, 2007.

On June 20th, 2007, the Tacoma city staff presented its own recommendations to the Planning Commission entitled *Staff Report and Proposed Amendment to the Comprehensive Plan*. The city staff report references the recommendations from ABHL but deviates from it in some significant ways. In many areas the staff reports seeks guidance from the Tacoma Planning Commission.

Because of the critical importance of the future success, success and attractiveness of Proctor, 6th Avenue and Stadium to the residents living in the North End Neighborhood, **the NENC makes the enclosed recommendations and requests they be adopted by the Planning Commission and ultimately by the Tacoma City Council.**

II. Executive Summary

The North End Neighborhood residents through their neighborhood council support the city's efforts to create more dense mixed use centers in the city which are pedestrian friendly urban villages, less car centric, and better designed buildings.

With a relatively vibrant neighborhood business district, extremely low retail vacancy rate and an attractive urban form in Proctor, North End residents want to ensure than any changes are beneficial to the area as they are generally pleased with how Proctor looks and functions today. Stadium and 6th Avenue also have well designed buildings as well which are built to the edge of the street.

The *City of Tacoma Mixed Use Centers Analysis*³ conducted by consultant AHBL, Inc. was a good investment for the city as it recommended many "best practices" to accomplish the council goals. More specifically, it set forth a methodology for Tacoma to implement to allow and encourage the building of a pedestrian friendly high density mixed use center. One of the critical steps recommended by AHBL, Inc. is the eliminating the off-street parking requirement

³ The Tacoma consultant AHBL, Inc recommendations *City of Tacoma Mixed Use Centers Analysis* can be found online at <http://www.cityoftacoma.org/File.ashx?cid=5800>.

in the mixed-use centers permitting the development of small lots with well designed buildings. Currently, Tacoma's antiquated off-street parking requirements have virtually mandated sprawlish low density developments in Tacoma where strip malls, poorly designed buildings and empty lots are the norm in many of Tacoma mixed use centers.

Removing the off-street parking requirement will create more affordable housing. New buildings should have continuous retail on the first floor, be built to the edge of the property, have few blank walls and should not have garage entrances and exits spilling onto the "main streets"⁴ of Proctor, 26th Avenue,⁵ 6th Avenue or in the Stadium District.

The attractive urban form in Proctor was only possible because it was originally built without the off-street parking requirement which was later enacted by the City of Tacoma⁶.

Because nearly every commercial parcel in Proctor is adjacent to a single family parcel (R-1) the NENC believes that the present three and a half story building height of 45 feet maximum is appropriate.

Much of Proctor, 6th Avenue and Stadium is composed of one-story buildings. There are a number of "strip mall" developments at the edge of Proctor that are available to be developed and filled in with attractive buildings. Implementing the recommendations of AHBL will permit significant redevelopment of Proctor and the other mixed use centers.

Finally, the city should promptly adopt the parking enforcement recommendations from AHBL on 6th Avenue of extending enforcement to 10:00 p.m. on Friday and Saturday night when the demand is the highest. Parking enforcement should be increased during periods of peak demand. Yet, presently, there is no parking enforcement after 6:00 p.m.

III. Goals (Output Measures) For Mixed Use Proposal

The goal for the North End Neighborhood recommendation is to retain the small pedestrian friendly "urban village" design that Proctor and a number of the other

⁴ The term "main street" is referred to by AHBL and other urban designers as the main thoroughfare in a mixed use center and justify higher standards for urban design.

⁵ Many of these standards are found in city codes in Seattle, Portland as well as *Codifying New Urbanism* published by the American Planning Association (2004). *The Municipal Research and Service Center of Washington* (MRSC) has accumulated a large resources and tools for more dense, pedestrian usable commercial centers. See <http://www.mrsc.org/Subjects/Planning/PlanIllust.aspx#compact>.

⁶ For a graphical illustration of how the off-street parking requirement leaves commercial areas pocked with empty lots and hamper investment. See *Onsite Parking: The Scourge of America's Commercial Districts*, Mott Smith (2006)(attached).

mixed use centers have and to make sure future developments adhere to the same standards.

More specifically, the specific urban design goals and recommendations are to

- 1) Retain an appropriate maximum height in the commercial parcels given the fact they are immediately adjacent to single family housing.
- 2) Encourage the development of empty lots and underutilized properties with well designed mixed use buildings.
- 3) Require new buildings to have continuous retail on the first floor on Proctor and 26th Avenue in a consistent manner with the existing buildings
- 4) Require new construction be built up to the lot line as are most of the other current buildings.
- 5) Require garage entrances to be placed in locations other than the main streets of Proctor⁷ and the other mixed use centers.

Because Tacoma's current building and zoning code do not require or even permit Proctor's attractive urban form to be replicated in newly constructed buildings, modifying the building code, if done properly, would benefit Proctor and the other mixed use centers greatly.

The NENC also supports the City of Tacoma goals for growth which

- 1) Protect critical/sensitive areas**
- 2) Protect industrial lands**
- 3) Protect single family neighborhoods⁸**
- 4) Direct density into centers**

The Tacoma City Council unanimously⁹ voted to enact these priorities by enacting Resolution 37070 voted on December 19, 2006.

IV. Methodology Used

The enclosed "Mixed Use Recommendations" submitted by NENC used four primary sources for its analysis and recommendations:

⁷ The same requirement should be made on 6th Avenue and the main streets in Stadium.

⁸ The North End Neighborhood Council recently submitted a letter in opposition to any expansion of the neighborhood code concerning attached or detached dwelling units as they would detrimentally affect the integrity of the North End Neighborhood.

⁹ The Tacoma City Council vote was 8 voting in favor with one abstention.

- 1) Peer reviewed articles, books, and other sources¹⁰ for designing urban mixed use centers.
- 2) Comparative zoning codes in other cities in Washington State and other cities¹¹.
- 3) AHBL, Inc consultant report : *City of Tacoma Mixed Use Center Analysis* as well as the subsequent city staff suggestions.
- 4) Community input from North End Neighborhood residents¹², and other community members.
- 5) Architects, planners, attorneys and other professionals in Tacoma.

Below is a comparative review of the recommendations of City of Tacoma consultant AHBL, Inc. presented to the Planning Commission, the city staff proposal and the enclosed North End Neighborhood Council proposal. Overall, the NENC proposal is closer to the AHBL recommendations¹³. The NENC believes the enclosed proposal is crafted to more closely accomplish the goals and policies enumerated by the Tacoma City Council as well as the North End Neighborhood residents and utilizes the best methodology designed to accomplish the goals.

V. Comparisons of Recommendations

AHBL Consultant Recommendations	City Staff Proposal	North End Neighborhood Recommendations
Parking : Remove Off-street parking requirements to infill mixed use centers, attract investment, create	Suggests more “flexible” off-street parking regulations.	Agrees with AHBL Consultant. Off-street parking requirements decrease the housing density, force the

¹⁰ Congress for New Urbanism (CNU) is the largest national group of architects and planners advocating for better designed urban centers. They have a large body of books and information on their web site at <http://www.cnu.org>. Salishan and UWT recently won design awards from CNU.

¹¹ Other cities which have removed their off-street parking requirements that are often referenced are Bellingham Municipal Code 20.12.010; Olympia Title 18 – UNIFIED DEVELOPMENT CODE 18.38.040; Seattle Municipal Code MNC 23.49.019, Portland Chapter 33.278.400 C(2).

¹² The North End Neighborhood Council has had numerous discussions of the policy issues for the mixed use centers including general meetings and committee meetings which are both open to the public with a published online agenda.

¹³ On many issues, the city staff has requested input from the Tacoma Planning Commission.

high density, and affordable housing. This policy would follow model cities in the west coast and implement the best practices in urban planning.		construction of poorly designed buildings ¹⁴ (such as strip malls), deter investment and pose a significant barrier to affordable housing.
Increase Maximum Height Permitted; suggests raising height limit in Proctor, Stadium, MLK Upper Central, and MLK South to 65’ but “stepping down” in scale closer to boundary.	No specific proposal from the city.	Retain Current 45 ft. Height Limit. Because of the immediate proximity of commercial units in Proctor to single family housing, the permissible building height should be “stepped down” to 45 feet as they are nearly all on a residential “boundary.”
Parking Management: Extend enforcement hours to 10:00 p.m. in centers where evening demand is highest. Currently, an unlimited parking duration is permitted throughout the entire weekends on 6 th Avenue.	No specific proposal from the city.	Agrees with AHBL Consultant. Enforcing 2 hours time limits on 6 th Avenue on Friday and Saturday nights would benefit businesses and the adjacent neighborhood. When demand is highest, more enforcement action should occur, not less.
“ Develop a sustainable Residential Parking Zone (RPZ) to be created along residential streets that are not intended to serve demand generated by mixed use centers.”	No specific proposal from the city.	Agrees with AHBL Consultant. If neighborhoods are being adversely affected after the current on-street spaces are managed well, the creation of Residential Parking Zone would be appropriate.
Modification to Multi Family Tax Incentive:	Modification to Multi Family Tax Incentive:	Maintain the Multi Family Tax Incentive in

¹⁴ “Planners cannot significantly improve the design of cities without reforming local parking requirements to emphasize quality over quantity...Reducing parking alone will improve urban design.” *Quantity versus Quality in Off-Street Parking Requirements, Journal of the American Planning Association*, Summer 2006, Vol. 72, No. 3 Vinit Mukhija and Donald Shoup.

<p>AHBL recommends generally keeping the tax incentive as is. However, they would remove Multi Family Tax Incentive for “established” mixed use centers such as Proctor and Stadium.</p>	<p>Suggest adding numerous requirements to potential users of tax incentive programs and new building design standards.</p>	<p>its current form with no revisions¹⁵. The Tax incentive furthers the council’s policy priorities to: comply with GMA, reduce sprawl, reduce road building costs, reduce car reliance, traffic congestion and pollution, revitalize downtown and the mixed use centers¹⁶.</p>
<p>Bonuses and “open space” issues</p> <p>No recommendation is made from AHBL on these issues.</p>	<p>Suggests offering density bonuses when certain design criteria are met.</p> <p>Suggests requiring “open space” in mixed use buildings.</p>	<p>Regulations should be streamlined so that a mixed use building is the preferred model rather than a single story building.</p> <p>Oppose requiring or encouraging “open space” in a mixed use building as they do more harm than good while undermining the objective to place housing density in the mixed use centers.</p>

VI. Removal of Off-street Parking Requirements to Permit Infilling of Empty Lots, Redevelopment of Underutilized Parcels and to Allow the Creation of Affordable Housing.

The NENC recommends that the Planning Commission accept and adopt AHBL’s recommendation that the city remove the off-street parking requirements in the city’s mixed use centers including Proctor, 6th Avenue and the Stadium District.

Consider removing parking requirements in NCX, CCX, and USX zones in multifamily housing where parking management policies are in place.

¹⁵ None of the many Washington cities that currently use the multifamily tax exemption have different building codes for the users of the incentive program. The NENC believes the same high standards for buildings should exist regardless if the incentive is used or not.

¹⁶ The NENC also believes that infilling the Tacoma’s mixed use centers has the potential benefit of retaining a higher student population in neighborhood schools which reduce the pressure to close them.

See page 46 of AHBL recommendations. Following the recommendations of AHBL would implement the “best practices” for creating a successful commercial center, it would follow the practice of other cities which have done so¹⁷. A plethora of articles, books on urban design published over the past 15 years overwhelming support removing the off-street parking requirements in commercial business districts¹⁸.

Permitting the market to determine the number of units to be built is a very modest step to move Tacoma from a suburban building code¹⁹ to more an urban one which can create attractive pedestrian friendly commercial centers. Some cities such as Seattle and San Francisco goes much further and limit the number of parking spaces that can be built. AHBL and the NENC simply recommend that the city remove its antiquated building code which demands that more spaces be built than the market demands for each building. Developers will still be able to build as much parking that is appropriate²⁰.

A) Parking Requirements Detrimental Effects on Attracting Investment in Commercial Areas, and on the Density of Housing.

AHBL recommends removing the off-street parking requirement to encourage investment and to “direct density into centers,” a policy which the City Council has repeatedly endorsed. An excellent article on the negative effects of the off-street parking requirement in urban centers is

Onsite Parking: The Scourge of America's Commercial Districts

Onsite parking requirements, which have crept into many cities' laws over the past 50 to 70 years, have sucked the potential out of commercial properties on main streets and in downtowns everywhere. Perhaps more than anything else, rules requiring onsite parking -- to be distinguished from "on street" or "offsite" parking -- have created the blighted conditions that characterize many older North American commercial districts and boulevards.

¹⁷ Seattle and San Francisco have removed the off-street parking requirement in their mixed use centers. Additionally, Bellingham, Olympia, and Portland have removed the off-street parking requirement in their downtown districts..

¹⁸*No Parking: Condos Leave Out Cars*, New York Times (2006)(“Last year, for example, Seattle reduced parking requirements for multifamily housing in three of the city’s major commercial corridors. Next month, the City Council will vote on a proposal to eliminate minimum parking requirements in Seattle’s six core urban districts...”) *High Cost of Free Parking*¹⁸ (Shoup 2004); “Off-street parking requirements especially harm the CBD. High density is a prime advantage of the CBD because it offers proximity to many social cultural and economic activities. The clustering of museums, theaters, restaurants, stores and offices is what a downtown can offer but other areas cannot. Parking requirements thus reduce the CBD’s attractiveness by undermining the essential features that make it attractive-high density and accessibility.

¹⁹ *No Parking: Condos Leave Out Cars*, New York Times (2006)(“Minimum parking requirements became popular in the 1950s with the growth of suburbia”)

²⁰ To the extent Tacoma’s off-street parking requirement forces a developer to build more parking than they desire, the off-street parking requirement becomes a de-facto impact fee than would not be imposed in many other cities.

Planetizen, *The Planning and Development Network* (March 31, 2006). Removing the off-street parking requirement is critical for developing empty and underutilized lots which pock Tacoma's mixed use centers so that they may be infilled with appropriate buildings.

B) Off-Street Parking Requirements Poses an Unnecessary Barrier on the Creation of Affordable Housing in Tacoma

The City of Tacoma has repeatedly stated its support of the creation of affordable housing in Tacoma.

AHBL recommendations for Tacoma reflect the well accepted connection between off-street parking requirements and the price and supply of affordable housing:

4. Unbundle Parking from Condominiums and Rental Units

Program Description

Housing affordability is dramatically affected by the requirements to provide off-street parking along with housing units, and production of multifamily units without off-street parking in transit-oriented areas significantly increases the supply of affordable housing by enabling more households to qualify for mortgages. Unbundling parking from new dwelling units offers choices to buyers by offering sale of parking stalls in structures independently from residential units.

Recommendations

Require (zoning code) unbundled parking supply in new residential projects in Centers with "established" and "emerging" multifamily residential markets:

...

Precedents

Successful programs in Cities of Portland and San Francisco

See page 46 of AHBL recommendation on the issue²¹.

²¹ The authoritative text *High Cost of Free Parking*, Shoup (2005) published by the American Planning Association notes "Off-street parking requirements harm low income and renter families because they own few cars but still pay for parking indirectly, and the hidden costs for all the required parking consume a greater share of their income." Pg 65. See also : *Housing Affordability: Final Report and Recommendations from the Pierce County Housing Affordability Task Force* which repeatedly discusses how the off-street parking requirement poses a significant barrier for the affordability of housing in Pierce County; *Parking Requirements and Housing Affordability: A Case Study of San Francisco* (1998) ("...it was estimated that tens of thousands of additional households could qualify for home mortgages for units without off-street parking if those units could legally be provided... Todd Litman estimated that one parking space per unit increased the cost by 12.5%... Thus, because parking places are required, more up-scale features are typically included in the unit and this causes their prices to rise even further");

The AHBL recommendations permits residents to have the ability to purchase parking separately from housing thereby making housing more affordable:

De-coupling housing and parking as other cities have done will give Tacomans an ability to be able to purchase housing easier and weigh the cost of parking with other transportation alternatives such as transit or car sharing.

C) Benefit to the Environment

Removing the off-street parking requirement will result in the reduction of, traffic congestion and greenhouse gases being omitted²². Currently, the City of Tacoma essentially requires each and every residents who seeks to obtain housing in downtown or in the mixed use centers to either buy or rent a parking space which forces residents downtown to lead a car centric lifestyle and undermines the many policies the city council have stated they support. If residents are given a choice as to how much parking they wish to buy, as they are allowed to in other cities, some will choose alternative modes of transportation.

VII. Develop Residential Parking Zones When Necessary

City of Tacoma consultant AHBL suggests that the city

“Develop a sustainable Residential Parking Zone²³ (RPZ) to be implemented along residential streets that are not intended to serve demand generated by centers.”

The North End Neighborhood Council agrees with this recommendation. However, this step need only be taken after implementing AHBL’s recommendation to enforce time limits on parking during times of peak demand at night.

Currently, anyone is allowed to park their car continuously from 4:00 p.m. Friday to 10:00 a.m. Monday during the highest demand periods on 6th Avenue for free. Adopting AHBL’s recommendation to extend traffic enforcement to 10:00 p.m. on peak nights would likely solve much of 6th Avenue’s parking issues²⁴. Parking enforcement in the 2 hour zones on 6th Avenue should increase during periods of greater demand for parking, not decrease.

VIII. Height Limits in Proctor Should Remain at 45 Feet

²² The issues of trip reduction, reduction of greenhouse gases and traffic issues are a current concern to the Tacoma City Council.

²³ A Residential Parking Zone is a curb space set aside exclusively for residents in the area.

²⁴ Certainly the enforcement of the 2 hours zones during peak periods should occur before the city consider more drastic or costly steps.

Because of the limited size of the Proctor mixed use center and the immediate proximity of nearly every commercial parcel to single family homes in Proctor, the current height limit of 45 feet should be retained.

Consultant ABHL placed Proctor, Stadium, MLK Upper Central, MLK South in the same category and suggested that the height be increased to 65 feet in each center. However, there are many factors which differentiate the districts from Proctor which would make the current 45 foot height limit appropriate²⁵.

First, Stadium, MLK Upper Central and MLK South are all within the now enlarged “downtown” which the council has designated for a higher concentration of growth. In contrast, Proctor is relatively remote.

Second, Stadium, MLK, Upper Central and MLK South are all much closer to transportation systems such as multiple bus lines, freeway entrances and light rail downtown.

Third, consultant ABHL recommends that the height of the commercial buildings be “stepped down” closer to the boundary between the commercial area to the residential housing. Because nearly all of the commercial parcels in Proctor are immediately adjacent to single family residential housing, a height of 45 feet is consistent with the recommendations of ABHL which specifically recommends a lower height at the boundary areas.

Fourth, Proctor is functioning well economically with very few retail vacancies. Therefore, there is less of a compelling interest to create additional development in Proctor as there is in other mixed use centers.

The NENC believes that given that well over half of the commercial parcels in Proctor are either one story or empty lots, the current 45 foot height limit (3 and half stories) coupled with the removal of the off-street parking requirement should encourage and enable significant redevelopment in the future.

IX. The Multi Family Tax Exemption Should Remain Unaltered to Focus Growth in Mixed Use Centers and Downtown Tacoma Rather Than Inappropriately in Neighborhoods or at the Edge of the City (Suburbs).

The multi family tax incentive program and the Growth Management Act are designed to reduce sprawl : place new housing in the commercial districts in cities rather than at increasing distances on the city’s edge.

²⁵ The City of Tacoma can set NECX zones at different heights. The NECX zones are different from each other and it is appropriate to treated them differently.

The tax incentive program has the benefits of protecting single family neighborhood, reducing sprawl, revitalizing mixed-use centers, reducing traffic congestion and pollution²⁶.

The NENC understands that the population of Tacoma will increase significantly in the coming years. Rather than forcing housing inappropriately in established neighborhoods with small dwelling units, which the NENC has opposed, the NENC strongly recommends that new housing be placed in downtown and in the mixed use centers. Consequently, in order to implement these priorities, the NENC opposes any additional burdens to the multi family tax exemption for either downtown or the mixed use centers. If additional barriers to the tax incentive program occurred, housing would increasingly be built on the edge of the city and in the county where land is the cheapest and greater pressure would be put on the neighborhoods in Tacoma to accept inappropriate developments.

A) Multi Family Tax Incentive and Building and Zoning Codes

As discussed above, the NENC have set forth a number of changes to the building codes which will encourage the development infilling of Proctor, 6th Avenue and Stadium while creating good urban form which is pedestrian friendly and attractive. The city should not have two different building codes, one with the multifamily tax incentive program and one without. Buildings should be designed and built well regardless if they qualify for the tax incentive program or not. A review of the codes in other cities reveal that none of them have different design standards for users of the tax incentive.

B) The Proposal to Require or Encourage “Open Space” in Mixed Use Developments Should Be Declined²⁷

North End residents certainly value the public open space they have including parks and schools. North End residents have also worked to beautify the small public open spaces they have.

However, one of the central characteristics of a good urban form in a mixed use “urban village” is that the buildings are connected with the street and the retail on the first floor of buildings and leave their buildings often to be “eyes on the street.”

Private spaces such interior courtyards make buildings more insular, cause residents to lead more of their life within the building to the detriment of the

²⁶ The latest demographic information shows that the population of the City of Tacoma is increasing at a slower rate than the rest of Pierce County. This indicates that most of the new housing is still unfortunately being built outside of the city limits and failing to accomplish the goals of the Washington Growth Management Act. Incentives for infilling Tacoma’s downtown and mixed use centers need to be increased, not decreased.

²⁷ The NENC realizes that the “open space” issue for a PRD is another issue completely. In a PRD, the developer owns the entire area.

surrounding neighborhood. Builders are certainly free to provide whatever common areas they wish for their residents and the potential residents can weigh the benefits and drawbacks of each building. However, the city should not encourage or require such building design as they create no public benefit and in fact are detrimental.

Even if open spaces were created that were accessible to the public it would likely cause the building to be set back from the property line which is undesirable. This requirement would also lower the density of developments and poses another barrier to a well designed development.

Also, most of the commercial lots in the mixed use districts are small. There is simply no room in a small commercial lot for an “open space.” Finally, A small alcove like “open space” on a commercial lot, if it were open to the public, makes it less likely it would be designed as well from a crime prevention²⁸ standpoint. Pedestrians could be faced with walking up to a blind corner.

X. Conclusion

The North End Residents believe that the enclosed recommendations will provide a significant incentive for attractive infilling of the mixed use centers along with the incentives and mechanism to do so. The NENC joins city consultant AHBL in recommending the removal of the off-street parking requirement. Such a step is necessary for a good urban design and will encourage redevelopment and investment in Proctor at a reasonable height.

The NENC recommends that the current 45 foot height limit be retained as Proctor is a small and narrow mixed use center and nearly every commercial parcel is on the border of residential properties. A 45 foot height limit is approximately 3 and a half stories and is appropriate height when it is adjacent to a single family home.

The NENC recognizes that there are choices on growth to be made and directing the growth with into downtown and the mixed use centers is the preferable location rather than attempting to force additional dwelling units onto existing lots. Thus, the NENC supports the multi-family tax incentive to direct growth downtown and in the mixed use centers to reduce sprawl, protect neighborhoods, protect critical areas, reduce pollution, reduce congestion and to create more affordable housing.

The NENC also requests that additional urban design requirements in the Proctor and 6th Avenue districts be enacted so that new construction can be more pedestrian usable, friendly and attractive.

²⁸ See CPTED Principles : Crime Prevention Through Environmental Design.