



NARROWMOOR CONSERVATION DISTRICT

FINDINGS AND RECOMMENDATIONS

At its meeting of May 27, 2015, the Landmarks Preservation Commission adopted the following as Findings and Recommendations, regarding the proposed Narrowmoor Conservation District Overlay Zone.

FINDINGS

1. The West Slope Neighborhood appears to meet the criteria for a conservation district, per TMC 13.07.060, as follows:
 - a. Appropriate documentation of eligibility is readily available. Survey documentation is already prepared or could be easily prepared by an outside party in a timely manner.
 - In 2009, the City contracted with a consultant to survey and make recommendations regarding a potential historic district in the West Slope Neighborhood. The resulting "Painter Study" documented the development history of the neighborhood and made a series of recommendations, including the consideration of a conservation district as a land use tool that was consistent with both the neighborhood's significance and the desires of residents. In 2012, the West Slope Neighborhood Coalition also retained the planning services of Baseline Engineering, which also completed a survey of the neighborhood.
 - b. For proposed conservation districts, preliminary analysis indicates that the area appears to have a distinctive character that is desirable to maintain.
 - Both the Painter Study and the Baseline survey indicated that there is a prevailing character, that taken as a whole, is distinctive from other areas in the city.
 - The Narrowmoor Conservation District is primarily significant for the design of the subdivision itself, including the layout of the subdivision and the effect of the controls on its historical development, as evidenced in the covenants that governed how the individual lots could be developed. The result is a unique design that responds to the topographical location and does not reflect the prevalent subdivision design models in use at the time, which was based on the picturesque landscape traditions and Federal Housing Administration guidelines.
 - The primary significance of the residential architecture in the Narrowmoor Conservation District concerns the placement of individual homes, which is part of the subdivision design. The design of the entire subdivision and the design of the individual lots is distinctive and contributes to the historic significance of this subdivision. The architecture of the homes themselves, which display the full range of World War II-era and post-war styles and building types, is not unique, although many homes share certain distinctive features, which should be preserved to the greatest extent possible. Most of the houses in the Narrowmoor

Additions were constructed in the 1950s, although a significant number were built in the 1940s. The Period of Significance for the development is 1944, the date the first plat was recorded, to 1969, when architectural styles began to change.

- The Narrowmoor Addition is an established and familiar neighborhood. Like several subdivisions in the Tacoma West Slope area, it overlooks the Tacoma Narrows and Tacoma Narrows Bridge. It is unique, however, for the way the subdivision and site design within individual lots was designed to respond to views. The visual features of the subdivision include large lots; sloping lots that are often terraced to create building sites that optimize views; low profile homes and landscaping to protect views; and site designs that were, in the past, controlled on a lot-by-lot basis. These characteristics, along with an overall suburban feel to the streetscapes within the subdivision, make the Narrowmoor Additions a unique and well known feature among Tacoma neighborhoods.
- c. A demonstrated substantial number of property owners appear to support such a designation, as evidenced by letters, petitions or feedback from public workshops.
- The West Slope Neighborhood Coalition has sought feedback from residents on numerous occasions, primarily through mass mailings and public meetings and workshops, beginning in 2009. The West Slope Neighborhood Coalition voted to initiate the application for a conservation district in 2011, and mailing surveys were taken in 2012.
 - Public information meetings were held on November 18, 2014 and February 5, 2015. In both meetings, there was general public support, although no poll was taken and there were individuals present that were opposed to the district. Twenty (20) written comments were received between February 11 and April 8, 2015. Of these, (12) were in support, (4) were opposed, and (4) were written to address specific issues with the proposal and/or design guidelines. The supporting letters included a letter from the West End Neighborhood Council. Opposing letters included a letter from the Tacoma-Pierce County Master Builders Association.
 - The postcard survey was distributed with the public notice to property owners inside and within 400' of the proposed boundaries, totally 1058 individual notices. By the end of the comment period, 155 surveys had been returned, including 121 from within the proposed district boundaries. Of those from within the proposed boundaries, 82% (99 responses) were in support of the district, 14% (17 responses) were opposed, and 3% (4 responses) indicated "not enough information). One person indicated "neutral."
 - Overall, including those responses from outside the district, 76% were in favor, 15% opposed, 3% neutral and 5% indicated "not enough information."
 - Eighteen individuals testified at the hearing. Of these, 15 were generally in favor of the district, 2 were opposed, and 1 indicated that he was neutral but not opposed.
- d. Creation of the district is compatible with and supports community and neighborhood plans.

- Among other policies, the Neighborhoods Element of the Comprehensive Plan states: Explore the potential designation of two historic districts in the Ruston/Jane Clark Park and West Slope (Titlow/Day Island) areas (WE-1.4).
- e. The area abuts another area already listed as a historic district or conservation district
 - This criterion is not applicable.
 - f. The objectives of the community cannot be adequately achieved using other land use tools.
 - There has been extensive discussion on this point. Modifying the view sensitive district overlay, for example, to lower the maximum height would achieve some measure of protection for the overall scale, look and feel of the district. However, other critical character elements, such as massing, form, lot layout and siting would not be addressed by the VSD.
 - Other discussion and suggestions have included creating a new zoning district or overlay zone with development standards tailored to the neighborhood character. Currently there are no other mechanisms in the land use code for such an approach other than the conservation district, which is described in the Comprehensive Plan Historic Preservation Element. Tacoma currently does not have a design review overlay tool.
2. The proposed regulations meet the requirements of a conservation district overlay.
- a. TMC 13.07.120 requires that design guidelines be adopted and maintained for conservation districts, and that the design guidelines address height, scale, massing, exterior cladding and materials, building form and shape, fenestration pattern and window materials, architectural details, additions, parking, main entrances, rhythm of openings, accessory structures, and sustainable design.
 - b. The proposal originally submitted by the West Slope Neighborhood Coalition in 2013 to establish a conservation district did not provide a means to protect neighborhood character, and was primarily limited to height restrictions, lot size, vegetation controls and accessory buildings. Extensive discussion and input from the Commission over the course of a year has resulted in a much more robust proposal.
 - c. The Landmarks Preservation Commission, in conjunction with the West Slope Neighborhood Coalition, has reviewed and approved a draft set of neighborhood design guidelines at its public meetings that address as applicable the basic design guideline requirements.
 - d. The recommended ordinance language requires design review for new construction, additions to existing structures, and demolition that meets the demolition threshold defined in the code section.
 - e. Scale, site design, and building placement are critical to the preservation of the character of the proposed conservation district. The proposed guidelines will provide a measure of

protection, while protecting the rights of property owners to have reasonably use and enjoyment of their property.

- f. It is not the intent of the district to prohibit future development, but rather to anticipate and guide such development. Setting a large minimum lot size, as originally proposed, could effectively halt future development. However, the preservation of unique elements such as “through lots” that extend from street to street is critical to the overall character of the neighborhood.
3. During the discussion of the conservation district proposal, there were several issues that were discussed at length. While the discussion clearly demonstrated the significance of these issues, ultimately, they represent land use issues that are broader than the conservation district proposal itself.
 - a. The historical street pattern is a significant character defining element, but the present historical pattern may conflict with City street standards. Although streetscape is not proposed for regulation in the conservation district recommendation because it is beyond the typical scope of conservation district regulation, the City should explore creating a set of standard plans that both meet City requirements for infrastructure as well as preserve neighborhood character.
 - b. There is a strong desire to regulate tall trees and vegetation. It has been the City’s position, and the Landmark Preservation Commission’s direction, that regulation of trees is not something that can be addressed through the conservation district tool. However, this is an issue that is important to residents in many view areas of the City, and should be addressed on a City-wide basis. This is reflected in the Commission’s recommendations to the Planning Commission.
 - c. Issues relating to accessory structures, including maximum size, allowable number, height and placement, were all identified as important considerations. It is critical to align the regulations in the Land Use Code, existing neighborhood covenants, and preservation of neighborhood character.
 - The existing regulations for height of accessory structures in the R-1 zone appears to be compatible with neighborhood character, so no additional design controls are proposed for height of accessory buildings within the conservation district. Although public comment has suggested further restricting height, the Landmarks Commission feels that additional study is needed to evaluate this issue.
 - Size, sitting and location of accessory structures are all critical to character within the proposed conservation district and should be included in the design guidelines.
 - Although current zoning sets a maximum total square footage for all accessory buildings on a single lot, there is no maximum number of accessory buildings or garages. When combined with attached garages, this potentially could allow a proliferation of parking structures on a residential lot, harming neighborhood

character in many neighborhoods. The Landmarks Commission feels that this is an issue that warrants further exploration on a citywide basis.

4. The existing private covenants in Narrowmoor Additions 1-4 provide some measures for directing development in the proposed conservation district. It is not the intent of the conservation district regulation to replace the covenants or to assume the role of enforcing the covenants.
 - a. The conservation district is intended to protect the neighborhood character as it exists and to ensure a reasonable certainty that future development will continue to respect that character. In doing so, the proposed controls and regulations provide guidance beyond that found in the covenants or zoning, including exterior materials, form, scale and massing, and site layout.
 - b. The proposed guidelines and ordinance will conform to both the existing private covenants and land use regulations. Extensive discussion has occurred to identify and resolve conflicts between those documents, and these efforts are reflected in the recommend guideline language.
 - c. The original plat documents and covenants included racially discriminatory language. The West Slope Neighborhood Coalition states that it rejects this language and has submitted an organizational statement to demonstrate that diversity is one of their primary objectives. This language is redacted from modern recorded versions of the covenants. The Landmarks Commission acknowledges this significant and shameful history, and bases its recommendation solely on the physical characteristics of the Narrowmoor Additions and the criteria for eligibility contained in the code.

RECOMMENDATIONS TO THE PLANNING COMMISSION

1. Establish a conservation district in the West Slope Neighborhood of Tacoma, roughly bounded by the centerlines of Jackson Street to the east, South 19th Street to the south, Mountain View Avenue and South Linden Lane on the west, and Karl Johan Drive and State Highway 16 to the north (see accompanying map). The conservation district should be called the "Narrowmoor Addition Conservation District" to acknowledge the historical names of the plats.
2. The conservation district should regulate development activity subject to building permit requirements within its boundaries that includes construction of new structures, additional square footage added to existing structures, and the demolition of existing primary structures where such a demolition removes 50% or more of existing exterior walls, roof, or removes the primary elevation and lot subdivision.
3. Once established, the Landmarks Preservation Commission will formally adopt and use a set of design guidelines per TMC 13.07.120 to evaluate the appropriateness of development proposals, and will approve, modify, or deny such approvals consistent with TMC 13.05.046 prior to the issuance of building permits.
4. The siting characteristics and open space within the district are critical to its character, as is lot configuration. The Landmarks Preservation Commission therefore recommends:

- Maximum combined lot coverage for all structures on a parcel of 25% of the parcel size. The Landmarks Commission also recommends that this issue be examined on a broader basis by the Planning Commission.
 - The prevailing lot characteristic is the “through lot,” where the lot is fronted on the east and west ends by a north/south street. Where such a lot is subdivided, the new lots shall maintain this pattern. Transecting a through lot to create an “upper” and “lower” lot is contrary to the historical development pattern and should be prohibited.
 - Minimum lot frontage in the Conservation District for new lots should be 60 feet.
5. There is no maximum number of garages proposed for the conservation district, although the Design Guidelines language recommended by the Landmarks Commission sets a maximum square footage of 600 SF, with a minimum setback from the western property line of 25 feet. The Landmarks Commission received many comments on the size, location and visual impacts of garages in this neighborhood, and recommends that further examination of whether it would be warranted to consider maximums for the number of garages/accessory buildings in residential neighborhoods citywide.
 6. The Landmarks Commission also received extensive comment on the impacts of tall growing vegetation and trees on neighborhood views in this neighborhood. It is the recommendation of the Landmarks Commission to exclude regulation of trees from the Conservation District, as it is beyond the scope of conservation district jurisdiction. However, community concern with trees and views appears to be significant and is likely an issue beyond the West Slope Neighborhood. If this question is explored in the land use or another regulatory context, it should be done on a citywide basis in View Sensitive Districts.
 7. Streetscape is not recommended to be addressed in the proposed conservation district overlay or its guidelines. However, it appears that current City standard plans for sidewalk and street design may conflict with the historical development pattern. Although the historical condition may not be acceptable for modern safety and accessibility standards, the Commission recommends that the City explore the development of standard plans for Narrowmoor that meet modern requirements while also respecting or acknowledging the historical configuration.
 8. The Landmarks Commission recommends that TMC 13.06.645 (Variances) be amended to include consideration of design guidelines and historic preservation standards for any variance involving a property that is listed on the Tacoma Register of Historic Places, or is located within a historic special review or conservation district overlay zone.