

**From:** Michael Lafreniere <info@historictacoma.org>  
**Sent:** Monday, June 19, 2023 5:50 PM  
**To:** City Clerk's Office  
**Subject:** 'Moratorium Resolution Letter'  
**Attachments:** Moratorium Resolution Letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello Doris,

I am sending you the attached updated version of the letter from Historic Tacoma. It includes Bill Baarsma's name on the list of board members in the letterhead sidebar. The previous version neglected to include that correction.

Thank you for distributing this latest version instead.

Regards,

Michael Lafreniere

Sent from my T-Mobile 5G Device  
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PRESERVATION.

[www.HistoricTacoma.org](http://www.HistoricTacoma.org)

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June 19, 2023

Tacoma City Council  
[cityclerk@cityoftacoma.org](mailto:cityclerk@cityoftacoma.org)  
747 Market Street  
Tacoma, WA 98402

[sent via electronic mail]

Re: Tacoma Council Resolution No. 41226

Dear Mayor Woodward and Council members:

Historic Tacoma is deeply concerned by CM Rumbaugh's proposed resolution concerning a moratorium on historic and conservation districts within Tacoma. It seems a solution in search of a problem at a time when Tacoma is already facing significant and serious challenges.

Given the various and acute issues facing the city and its residents from increased violent crime and out-of-control property crime, an ever increasing homeless and low-income housing crisis, and a rapidly declining downtown, we find an "emergency" resolution on historic districts to be a distraction, at best, a poor allocation of City resources and staff time. Indeed, this resolution creates the very bureaucratic turmoil and time costs to staff and volunteers that it claims it is intended to address, especially if the "public process" requested includes public hearings. It also occurs just when staff are struggling to hold Home in Tacoma public meetings.

We are also concerned by the suggestion that there are preservationist cabals in neighborhoods preparing a "flood" of historic district nominations between now and the completion of the 2024 Comprehensive Plan update. We assure you that we are unaware of any such activities. In fact, nominations are the result of professional assessment, deep research and public outreach: an extremely time-consuming process.

Talk of such a moratorium, however, may have considerable negative effects. We are aware of very preliminary discussions - "embers" if you will - of possible interest in historic districts in East and South Tacoma, the very underserved areas alluded to in the resolution. Talk of a moratorium would douse these community-driven embers. A better way to address historic preservation equity is not to restrict efforts by residents and stakeholders, but rather to be proactive by directing equity funding toward the creation of more historic and conservation districts in such neighborhoods as McKinley Hill, Lincoln, and South Tacoma and to use it to protect small, more affordable houses and much needed tree canopy as well as Tacoma's rich culturally and economically diverse history.

More importantly, suggesting that Tacoma may move away from its long commitment to historic preservation might very well jeopardize tens of millions of dollars of outside investment in our downtown historic districts. City Council needs to appreciate the complex relationship between the financial incentives of the City's downtown historic districts and Federal tax credits for the adaptive reuse of commercial buildings, often for new housing. Historic district boundaries must be flexible for continued downtown redevelopment. Tacoma is not the only place these investors can put their money, and reactionary, negative resolutions could easily send it elsewhere. Do we really want to forego another McMenamins-like development?

Finally, we would like to direct CM Rumbaugh's attention to View Sensitive Districts (VSDs) which are far more restrictive than historic districts. VSDs cover about 12% of Tacoma's landmass (per the staff report), while city-designated historic and conservation districts cover only about 1%. All VSDs are in city's wealthiest neighborhoods where racial covenants existed. For example, Northeast Tacoma is covered with VSDs with virtually no Home in Tacoma Mid-scale areas proposed. CM Rumbaugh's equity concerns might be better served by eliminating VSDs.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Booker". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Kathleen Booker  
Preservation Committee

**From:** Chris Moore <Chris@preservewa.org>  
**Sent:** Monday, June 19, 2023 4:14 PM  
**To:** City Clerk's Office  
**Subject:** Tacoma Council Resolution 41226  
**Attachments:** WTHP ltr - Tacoma Resolution 41226.pdf

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Dear City Clerk,

Please find attached comments from the Washington Trust for Historic Preservation regarding Resolution No. 41226, being put in front of the Tacoma City Council at their meeting on 6/20. Please confirm that these comments will be included in the public record for tomorrow's meeting.

Thank you for the opportunity to comment.

Best,  
Chris

**Chris Moore** | Executive Director  
*he / him / his*

Washington Trust for Historic Preservation  
1204 Minor Avenue | Seattle, WA 98101  
206-624-9449 (o) | 206-930-5067 (c)

[preservewa.org](http://preservewa.org)



June 19, 2023

Tacoma City Council  
[cityclerk@cityoftacoma.org](mailto:cityclerk@cityoftacoma.org)  
747 Market Street  
Tacoma WA, 98402

[sent via electronic mail]

Re: Tacoma Council Resolution No. 41226

Dear Mayor Woodards and Members of the Council:

The Washington Trust is a nonprofit organization dedicated to saving the places that matter in Washington State and to promoting sustainable and economically viable communities through historic preservation. We are Washington's only statewide nonprofit advocacy organization working to build a collective ethic that preserves historic places through education, collaboration, and stewardship. In this role

The Washington Trust opposes Resolution No. 41226 in front of the council. This resolution would direct the Landmarks Preservation Commission (LPC) and the Planning Commission (PC) to conduct a public process for the purpose of recommending whether a moratorium on the nomination of local historic districts is warranted. We opposed this resolution for the following reasons:

- Such a moratorium is unnecessary. There are only four Historic Districts across the city listed in the Tacoma Register. The last to be listed – the Wedge Neighborhood Historic District – occurred in 2011. Since that time, only one additional local historic district has been nominated to the Tacoma Register – the proposed College Park Historic District. This nomination was ultimately denied by the Planning Commission in November 2022.
- The Resolution cites concerns over volunteer and staff time required to review local district nominations. Yet this is one of the primary functions of the LPC: to review nominations of eligible historic resources for consideration as individual landmarks or as part of a district. That only four local districts have been established points to the fact that district review is a relatively uncommon occurrence. And while the College Park Historic District nomination has been re-submitted for review, the amount of volunteer and staff time required to undertake this review should be significantly less given the short amount of time that has lapsed since the original review of this nomination.

- Review of the City's historic designation process is already slated to occur as part of the 2024 Comprehensive Plan update process. The public process the LPC and the PC would be required to undertake simply to recommend whether or not a moratorium is needed could well extend in to 2024. As such, it seems inefficient (as well as an intense use of volunteer and staff time) to consider what may be a short-lived moratorium given review of the process proposed as part of the Comprehensive Plan update. Furthermore, the likelihood of an additional district nomination being submitted prior the 2024 Comprehensive Plan update seems unlikely, given the relative few numbers of local historic districts (the pending re-review of the College Park Historic District notwithstanding).

Overall, we share concerns of both the LPC and PC regarding issues of equity and the historic designation process. A review of the process, including criteria, eligibility, and the pathway to designation, should all be considered with an equity lens in alignment with the city's overall values and goals. But as so few district nominations are actually submitted, we simply do not think a moratorium is required given the staff time involved to consider such a question and the fact that review of the designation process is already set to occur in 2024. We appreciate the opportunity to comment and look forward to continued conversations about this important issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Moore".

Chris Moore  
Executive Director

**From:** Jeffrey J. Ryan <jjryan@harbornet.com>  
**Sent:** Sunday, June 18, 2023 11:26 AM  
**To:** Woodards, Victoria; Hines, John; Blocker, Keith; Ushka, Catherine; Bushnell, Joe; Daniels, Kiara; Diaz, Olgy; Walker, Kristina; Rumbaugh, Sarah  
**Cc:** Pauli, Elizabeth; City Clerk's Office  
**Subject:** Proposed Moratorium on Historic Districts - Resolution RES41226 - Written Comments in Opposition to the resolution in its current form.  
**Attachments:** Preservation Positive L.A. Executive Summary.pdf; 10 Benefits of Establishing a Local Historic District - National Trust for Historic Preservation.pdf  
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Mayor and members of the Tacoma City Council,

What is the urgent concern that has driven this level of action, a moratorium on nominating local historic districts in the city of Tacoma?

Historic Districts are a vital part of our community and cultural history, a living example of our past and housing type that is appreciated by many. Historic districts are nominated by residents and require substantial support from residents to qualify for a public and staff review based on very specific requirements found in the TMC. The benefit's to a community and the cities that embrace historic districts are numerous and well documented over the last 50 years, local historic districts now offer the only open public review process under the new state housing mandates and should be expanded not curtailed in Tacoma. Please support public involvement in land use and design discussions that impact our community and support open public discussion at the local level, support historic districts in the City of Tacoma.

While I don't agree with the use of a moratorium on historic district review, since it serves no clear purpose or benefits, I do agree with the need to review the policies by which they are reviewed in Tacoma. The city of Tacoma is unique in its review process by requiring a redundant review process by two equally qualified charter committees, before a final review by our elected representatives. Tacoma is the only jurisdiction in the state that requires a planning commission review during the review of an historic district nomination, doubling the staff time and effort for what should be an administrative review process of a land use-discussion that does not restrict but assists in managing the compatibility of new development within an historic area of our city by the Tacoma Landmarks Preservation Commission, a public design review process of review by residents chosen by the Tacoma City Council.

The review process for an historic district nomination would be better served without the planning commission's involvement, their role under the TMC is to review the nomination based on the city's comprehensive and community plans, which supports the community based efforts for historic listing. As noted in the staff report for the last nomination before the TPC. The Landmarks commission could easily review a nomination against the comprehensive plan policies during their review process and reduce the review effort by half. Additionally as a nomination put forth by the residents, shouldn't the final review for approval be by our elected representative on the city council as is the case in every other jurisdiction in the state. Please work to improve the nomination process in our city and provide a fair open process for all residents equally regardless of stereotypes, bias and prejudices. Please streamline the process and make it fair for all based solely on stated city policies and facts.

Thank you for your time, and attention to this request.

Jeff Ryan, Architect  
Resident of the College Park National Historic Districts.



# PRESERVATION POSITIVE LOS ANGELES EXECUTIVE SUMMARY

PREPARED BY PLACEECONOMICS FOR THE LOS ANGELES CONSERVANCY | 2020



# EXECUTIVE SUMMARY

**Preservation Positive Los Angeles provides an in-depth look at historic preservation within L.A. and how historic places directly contribute to the overall livability of the city.** While anecdotally we know preservation and the reuse of older and historic buildings benefits peoples' lives, what has been missing—until now—is the data and analysis to fully back up these claims. This study demonstrates how preservation provides real value and positively impacts every Angeleno.

As the second-most populous city in the nation, L.A. is many things to many people. Yet fundamentally, it is a place where people create lives and homes: from those that are native-born to transplants arriving every day. It is through the historic built environment that Angelenos best learn about and understand the heritage of L.A., providing a tangible way to connect through a shared heritage and story.

Critics often claim that preservation limits growth, is anti-density, or stands in the way of affordable housing development. The data, however, shows a much different story where historic neighborhoods are proving that livability and preservation can work hand-in-hand. Historic preservation is not a barrier to growth as there is a lot of room to grow. **Only 6.2% of total parcels in L.A. have been identified as historic** through designation or by SurveyLA, leaving **93.8% available for new development, increased density, and much-needed housing.**


Preservation is affordable housing. As one of the most pressing concerns facing L.A. today, older, smaller, and mixed-use buildings represent the largest share of affordable housing in the city, from quaint bungalow courts to large garden apartment developments.

Historic Preservation Overlay Zones (HPOZs) also play a role in preserving the existing rent-controlled housing stock. While HPOZs are 2.4% of all parcels, they represent 5% of all units under rent control in the city. HPOZs are home to residents with a wide variety of incomes. A larger percentage of residents in HPOZs, than in the rest of the city, have annual household incomes of under \$25,000. The HPOZs of L.A. provide density at a human scale and protect affordable housing, mainly by providing a mix of housing options.

**While historic designation is not feasible or appropriate for every older property, HPOZs protect affordable housing, foster neighborhood stability, and serve as home to a racially and economically diverse population.** Today, single-family homeownership is no longer the only, or even the best indicator, of neighborhood stability. Longtime residents, be they owners or renters, are themselves a stabilizing force within a community—especially in HPOZs.

HPOZs are home to 3% of Los Angeles population and account for 5% of all long-term residents in the city as a whole. Renters, specifically, are disproportionately longer-term in HPOZs than in the rest of the city. Increasingly, renters are at great risk of displacement from property flipping, rising rents, condominium conversion, demolition, or Ellis Act evictions.

Cultural diversity is a backbone of the city's historic neighborhoods, which are more ethnically, racially, and income diverse than the rest of the city as a whole. Of the thirty-five HPOZs that currently exist, twenty-one have populations where there is a greater share of racial diversity than in the rest of the city. While they cover roughly 8.5 square miles of the city—just 1.8% of the city's land area as a whole—combined, they represent 3% of the population and households. Overall, 54% of residents in HPOZs identify as Latinx.



Adding greater density and preservation are not mutually exclusive. Already HPOZs include some of the densest neighborhoods in Los Angeles. On average, there are 5,300 more people per square mile in the HPOZs than in the rest of the city's residential areas. As much as 69% of housing in HPOZs has more than one unit, with 39% providing five or more units or apartments. This makes historic neighborhoods more accessible to renters and provides a greater range of rents and significantly higher density uses.

Surprisingly, while the majority of parcels in HPOZs are single-family housing, the large number of multi-family housing properties makes it the prevalent type of housing unit in HPOZs. Greater density is also possible in HPOZs, through sensitive infill construction, adaptive reuse, and Accessory Dwelling Units (ADUs). An analysis of HPOZ lot coverage shows that one-third of all single-family properties cover less than 40% of the lot. This represents over 3,400 properties in HPOZs that can accommodate one or more new ADUs.

**Preservation makes economic sense, especially as older buildings find new life through rehabilitation and adaptive reuse.** Interesting and authentic spaces infused with history, combined with modern-day amenities, prove to be attractive locations for businesses big and small. These types of projects drive the local economy and create jobs during development stages and after tenants move in.

Investing in older neighborhoods is a good return on investment. An analysis of more than 136,000 sales of single-family homes between 2000 and 2016 indicates that property values in HPOZs appreciate at a greater rate than the rest of the city. In the period between 2005 and 2015, the National Register Districts in L.A. which, include many commercial activities, enjoyed a job growth rate nearly three times that of the city as a whole.

**Rehabilitating older and historic buildings for new uses is not only cost-effective and good for the environment; it helps generate much-needed housing.** Between 1999 and 2019, L.A. created over 12,000 new housing units through adaptive reuse of historic buildings. Incentives including the Mills Act, the Adaptive Reuse Ordinance, and the federal and state rehabilitation historic tax credits make preservation even more competitive when compared to new construction.

Preservation is inherently green. Nevertheless, the current default in most American cities is to demolish what exists and build new, calling it green. The demolition of a 2,000 square foot house in L.A. generates 295 cubic yards of debris, weighing eighty-four tons. This study found that it takes ten to eighty years for a new building built 30% more efficient than an average-performing existing building to make up for the negative climate change impacts related to the demolition and construction process. While recycling building materials helps, reuse is fundamentally better as it keeps building materials out of the waste stream, preserves embodied energy, and creates less air and water pollution.

The Los Angeles Conservancy commissioned this study to better understand how historic preservation contributes quantitatively and qualitatively, to the city's economic, social, and environmental present and future. **From this report, it is clear that preservation plays a positive role in promoting stable neighborhoods, protecting existing affordable housing, and meeting new housing and creative office needs.** It shows that historic preservation does not impede growth or development; it upholds thoughtful strategies that do not sacrifice the city's invaluable historic resources. As the city looks to its future, viable solutions and opportunities provided by historic preservation should be considered. To view the full study, please visit [laconservancy.org/preservation-positive](http://laconservancy.org/preservation-positive).



*We would like to thank all of those whose financial contributions made this project and report possible.*

### **Leader**

Donaldson Trust  
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Los Angeles County Fund of the National Trust for Historic Preservation.***



LOS ANGELES  
**CONSERVANCY**

### **ABOUT THE LOS ANGELES CONSERVANCY**

The Los Angeles Conservancy is a nonprofit membership organization that works through education and advocacy to recognize, preserve, and revitalize the historic architectural and cultural resources of Los Angeles County. What began as a volunteer group in 1978 now has the largest membership of any local preservation organization in the U.S. For more information, please visit [laconservancy.org](http://laconservancy.org).



### **ABOUT PLACEECONOMICS**

PlaceEconomics is a private sector firm with over thirty years' experience in the thorough and robust analysis of the economic impacts of historic preservation. They conduct studies, surveys, and workshops in cities and states across the country that are addressing issues of downtown, neighborhood, and commercial district revitalization and the reuse of historic buildings. For more information, please visit [placeeconomics.com](http://placeeconomics.com).

Unless otherwise noted, all photos are credited to Adrian Scott Fine  
and the Los Angeles Conservancy.





# 10 Benefits of Establishing a Local Historic District

More :

[Preservation Tips and Tools](#)

By :

Julia Rocchi

So you've decided you want to establish a local historic district and have considered [where its boundaries should be](#) [Link: /10-on-tuesday-10-factors-in-establishing-local-historic-district-boundary-lines/]. Now comes perhaps the hardest part: getting your community to buy into the idea.

Shaping local sentiment and opinions is a complex task, and planning a local historic district is no exception. While the preservation community understands and appreciates its benefits, it's not guaranteed everybody will feel as enthusiastic about it. What's more, all the local stakeholders—homeowners, government officials, merchants, and property owners—will endorse, change, or reject proposals depending on how well they understand the issues involved.

So it's up to the district advocates to make a clear and compelling case for the advantages of a local historic district. Not only will it increase community awareness, but it can also help avoid controversy later by building consensus now.

Here are 10 points to share with your community stakeholders that outline the benefits of establishing a local historic district in your area.

**1. Local districts protect the investments of owners and residents of historic properties.** Insensitive or poorly planned development can make an area less attractive to investors and homebuyers, and thus undermine property value. In contrast, historic district

designation encourages people to buy and rehabilitate properties because they know their investment is protected over time.

**2. Properties within local historic districts appreciate at rates greater than the local market overall as well as faster than similar, non-designated neighborhoods.** Findings on this point are consistent across the country. Moreover, recent analysis shows that historic districts are also less vulnerable to market volatility from interest rate fluctuations and economic downturns.

**3. Local districts encourage better quality design.** In this case, better design equals a greater sense of cohesiveness, more innovative use of materials, and greater public appeal—all of which are shown to occur more often within designated districts than non-designated ones.



Española Way in Miami's South Beach.

**4. Local districts help the environment.** Historic districts encourage communities to retain and use their existing resources in established neighborhoods. This reduces the need for cars, cuts back on pollution and congestion, and eliminates landfill waste.

**5. Local districts are energy-efficient.** Many older buildings were designed with energy conservation in mind, taking advantage of natural light, cross-ventilation, and



climate-appropriate materials. Preservation commissions are also increasingly improving their design guidelines to make it easier for historic building owners to use renewable-energy technologies.

**6. Historic districts are a vehicle for education.** They are a tangible link to the past and a way to bring meaning to history and to people's lives. They preserve the original character of buildings and streets, while welcoming growth and innovation within those spaces. They are a living, active record of communities and their residents.

**7. Historic districts can positively impact the local economy through tourism.** An aesthetically cohesive and well-promoted district can be a community's most important attraction. According to a 2009 report, 78% of all U.S. leisure travelers are cultural and/or heritage travelers who spent, on average, \$994 on their most recent trips—compared to \$611 spent by non-cultural and heritage travelers.



Main Street, Chillicothe, Ohio

**8. Protecting local historic districts can enhance business recruitment potential.** Vibrant commercial cores and charming neighborhoods with character attract new business and quality industry. Companies continually relocate to communities that offer their workers a higher quality of life, which successful preservation programs and stable districts enhance.



**9. Local districts provide social and psychological benefits.** People living in historic districts enjoy the comfort of a human-scale environment (a mix of aesthetics and functionality that fit the average person's dimensions and capabilities); the opportunity to live and work in attractive surroundings; a recognizable and walkable neighborhood; and the galvanizing effect of community-based group action.

**10. Local districts give communities a voice in their future.** By participating in the designation process, citizens can help direct their communities' path. Making these decisions together in a structured way—rather than behind closed doors or without public comment—gives everyone involved a sense of empowerment and confidence.

The better you can articulate the benefits of a local historic district, the more easily you'll attract and retain supporters.