

From: Devin Kelly <peopleofearth@gmail.com>
Sent: Tuesday, June 27, 2023 8:01 AM
To: Woodards, Victoria; Walker, Kristina; Blocker, Keith; Daniels, Kiara; Diaz, Olgy; Ushka, Catherine; Bushnell, Joe; Rumbaugh, Sarah; Hines, John; Warren, Bucoda; clerk@cityoftacoma.org; Sorum, Doris (Legal); Fosbre, Bill (Legal); Casparian, Debra (Legal); Elder, ChiQuata; Harding, Melanie; Richardson, Ted
Cc: Ty Moore; Ann Dorn; Sean Arent; Holly; Jennifer Barfield; Zev Cook; Michael Whalen
Subject: Tonight: 20+ major T4A endorsers opposing competing ballot measure
Attachments: T4A Coalition Letter_Drop the Threat of a Competing Measure.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning Mayor Woodards, City Council Members and other city leaders,

This is Devin Rydel from the Tacoma For All Steering Committee, writing to update you on our coalition's plans for this evening's City Council meeting. We realize there is a full agenda and a community forum, and we appreciate the multiple opportunities to engage with you, Tacoma voters, and the press.

Our plan for tonight is to forcibly but respectfully demand the city pass your Rental Housing Code ordinance as is, then step aside and let voters decide on our Tenant Bill of Rights. Again, we respect the two years of work that went into your process. We are encouraging our base to support your changes, but also highlight that we need to pass the initiative as well if we want the boldest protections possible.

I've attached a letter signed by over 20 prominent organizational and individual endorsers, including State Senator Yasmin Trudeau, former City Council Member Justin Camarata, TPS School Board Governor Chelsea McElroy, the Labor Council, multiple UFCW locals, and stakeholder group representatives from the Tenant Law Center, the Washington Low Income Housing Alliance, and the Tacoma Tenants Union. We are united in demanding no competing ballot measure.

We will also present the legal memo that attorney Beverly Allen submitted to you yesterday, which refutes the City Attorney offices' legal concerns and is signed by seven prominent attorneys, including three who participated in your stakeholder group. At least one of the attorneys will be joining us tonight, along with several other major endorsers. To that end, please visit the bottom of our [website's homepage](#) for an updated list of our growing endorsers. The 27th LD Democrats overwhelmingly endorsed last night, but they're not on the site yet.

Finally, we are counting close to 200 individual letters that local voters have submitted through our EveryAction CRM. I want to highlight that it is set up so that only in-district voters can message their representatives. Each of those is from a real person who cares deeply about this, from all districts and all walks of life. We hope many are joining us tonight to support both your proposal and our own!

Thanks for your patience with this long email and this even longer day. We look forward to this evening, and to the city taking siding with tenants and the vast majority of Tacoma residents who have spoken on this issue. If recent elections on tenant rights throughout the West Coast are an indicator, then we are fully confident that together, we can win for everyone in Tacoma. Please join us in this vision.

In solidarity,
Devin Rydel Kelly
Tacoma For All Steering Committee

"If I can't dance, I don't want to be part of your revolution" - Emma Goldman



Drop the Threat of a Competing Ballot Measure

Dear Mayor Woodards and Tacoma City Council Members,

Over the last five years, landlords have hiked rents by 43% in Pierce County. With half of tenants in Tacoma officially rent burdened, even small rent hikes deepen the cruel and disruptive cycle of displacement of our most vulnerable neighbors, with women and communities of color hit the hardest.

Landlords in Pierce County are also evicting our neighbors at the highest rate in the state. As attorneys from Tacomaprobono's Housing Justice Project have pointed out, a big part of the problem is our far weaker tenant protections compared to King and other counties.

Clearly, there is an urgent need for bold policies to address the housing crisis and the cascading impacts to our schools, our social services, and the social fabric of our communities.

That is why we are urging you to step back from your threat to launch a competing ballot measure to the Tenant Bill of Rights. Instead, we urge you to quickly pass your proposed changes to the Rental Housing Code, which complement rather than compete with Initiative 2023-01. Between them, we could win even more comprehensive protections. If they compete, we could all lose.

While your proposed changes do not go far enough, most are positive and we respect the hard work of city staff, stakeholders, and council members who drafted them. Nonetheless, forcing voters into a false choice between the Tenant Bill of Rights and your weaker tenant protections would be a gift to the big landlords. It would place Tacoma City Council into an alliance with groups like Rental Housing Association and the Multi-Family Housing Association, and in opposition to tenants, organized labor, and the growing coalition of community and faith groups behind the Tenant Bill of Rights.

We understand that genuine concerns exist over the challenges small and non-profit landlords could face if Initiative 2023-01 passes. However, we remain confident that these concerns can be addressed through additional ordinance and – more importantly – that even small landlords are in a far stronger position to absorb cost increases than their most vulnerable tenants. Losing a renter still leaves landlords with passive income from their real estate investments. For renters forced out of their homes, the stakes are often far more dire.

Do the right thing. We urge you to endorse, or at least do nothing to harm, the growing coalition effort to pass the Tenant Bill of Rights this November.

Sincerely,

Beverly Allen* - Founding Partner, The Law Office of Beverly Allen

Justin Camarata* - Former Tacoma City Council Member and Chair, 27th LD Democrats

Kimi Irene Ginn* - Activist with Vibrant Schools

Devin Glaser* - Staff Attorney, Tenant Law Center

Bill Hanawalt - Former Tacoma School Board Candidate, progressive landlord

Andra Kranzler* - Directing Attorney, Tenant Law Center

Chelsea McElroy* - Director, Tacoma Public Schools Board, Position 4

Sally Perkins - Longtime community activist, progressive landlord

Cathy Pick - Lead Advocate, Tacoma Tenants Union

Devin Rydel Kelly * - Director, Foundation for Tacoma Students

Jamika Scott - City of Tacoma Council District 3 candidate

Yasmin Trudeau* - State Senator, Washington State 27th Legislative District

Michael Whalen* - United Food and Commercial Workers (UFCW) 367 Shop Steward and
Pierce County Central Labor Council Executive Board Member

350 Tacoma

The Conversation 253

Indivisible Tacoma

The Law Office of Beverly Allen

Mayor's Youth Commission of Tacoma

Pierce County Central Labor Council, AFL-CIO

Tacoma & Pierce County Democratic Socialists of America

Tacoma For All

Tacoma Tenants Union

Transit Riders Union

United Food and Commercial Workers (UFCW) Local 367

United Food and Commercial Workers (UFCW) Local 3000

Washington Housing Alliance Action Fund

Washington Low Income Housing Alliance

** Organizational affiliations are listed for identification purposes only.*

From: Emily.cl.hernandez@everyactionadvocacy.com on behalf of Emily Hernandez
<Emily.cl.hernandez@everyactionadvocacy.com>
Sent: Thursday, July 6, 2023 10:52 AM
To: Sorum, Doris (Legal)
Subject: Yes to Tenant Rights! No to Competing Measures!

Follow Up Flag: Follow up
Flag Status: Flagged

Dear City Clerk Doris Sorum,

I am writing to urge Tacoma City Council to step back from the threat to launch a competing ballot measure to the Tenant Bill of Rights, which is scheduled for a potential resolution vote at your upcoming June 27th meeting. We respect the hard work of city staff, stakeholders, and council members who drafted the city's proposed changes to the Rental Housing Code. We recommend that you quickly adopt these changes, which complement rather than compete with Initiative 2023-01. Between them, we could win even more comprehensive protections. If they compete, we could all lose.

Bringing a competing ballot initiative would place Tacoma City Council into an alliance with groups like Rental Housing Association and the Multi-Family Housing Association, and in opposition to tenants, organized labor, members of your own stakeholder group, and the growing coalition of community and faith groups behind the Tenant Bill of Rights.

Moreover, manufacturing a false choice between tenant protections is morally indefensible. Regardless of the reason for opposing tenant rights, running a competing initiative that misdirects voters would be rightly seen as a subversion of our democracy and a betrayal of the electorate. It could undermine the legitimacy of the City Council and raise questions about the integrity of council members who support such a move.

Like any bold expansion of rights or regulation, the Tenants Bill of Rights may potentially face legal challenges. But refusing to support a law that is both legal and just simply because of potential challenges would be a failure of good governance.

I strongly urge you and the City Council to reject the proposition of a competing ballot initiative and instead focus on upholding tenant protections that are legal, just, and in the best interests of the Tacoma community. Let us work together to ensure a fair and equitable rental housing environment that respects the rights and well-being of all residents.

Thank you for your attention to this matter. We anticipate your thoughtful consideration and a response that reflects the concerns of the people of Tacoma.

Sincerely,
Emily Hernandez
8240 E C St Tacoma, WA 98404-1035
Emily.cl.hernandez@gmail.com

From: Justin Angove <JustinAngove@outlook.com>
Sent: Thursday, July 6, 2023 11:32 AM
To: Woodards, Victoria; Hines, John; Rumbaugh, Sarah; Blocker, Keith; Ushka, Catherine; Bushnell, Joe; Daniels, Kiara; Diaz, Olgy; Walker, Kristina; City Clerk's Office
Cc: davids@tacomachamber.org; Angela Angove
Subject: Ordinance 28894

Follow Up Flag: Follow up
Flag Status: Flagged

As a stakeholder, I would like to comment on the proposed highlights. For over 15 years I have provided affordable, clean, and safe single family housing within the Tacoma City Limits. When I say "affordable", my rents are roughly \$200-\$500 below market values monthly. I understand the desire to protect renters from terrible landlords, but aggressive restrictions placed on property owners could easily have unintended consequences. Here are my thoughts for the current proposed highlights.

- A. Requiring 120-day notice for rent increases **I have no issues with this. I do not believe this is a burden on the property owner. I always give my tenants 6 months advanced notice of rent increases.**
- B. Sets maximum screening standards for income to rent ratio at 2.5x for most private units **This is a slippery slope. I believe 2.5x is not unreasonable, but any ratio lower than that increases risk for property owners. Its pretty simple, increased risk = increased rent or worse, less rentals available.**
- C. Prohibits landlords from requiring SSN for tenant screening **Proper verification of tenants is critical to appropriate background checks. Inability to verify identity, employment, rental history becomes an immediate disqualifier. Please reject this proposal.**
- D. Caps late fees at 1.5% of rent or \$75, whichever is less **This is guaranteed to increase rents. Weak late fees discourage on-time payment responsibility. Property owners will see this as increased risk = increased rents. It is in the tenants' best interest to have a lower monthly payment and make them on time, then a high monthly payment and lackadaisically make payments. Please reject this proposal for the sake of the tenants' bank account.**
- E. Requires landlords to offer 6 monthly payments for any move-in fees **I have mixed feelings about this. Currently I only require a deposit and first month's rent. Tenants already have the ability to negotiate this with the landlord and I have made exceptions for well qualified families. If this is forced upon property owners for all tenants', my policy will definitely change to a first, last, and deposit probably with an increase cost to the monthly rent. Please reject this proposal. It will cost the tenant more over a longer period of time.**

In addition, some councilmembers are proposing additional amendments as follows, though specific text is not available:

1. Winter Eviction Limitations [proposed by Councilmembers Diaz & Daniels]: Prohibits evictions December to March. **If this were to pass, I would sell my rental in Tacoma and purchase one elsewhere. This dramatically increases risk to property owners and will immediately reduce the availability of affordable rentals.**
2. Economic Displacement Relocation Assistance [CM Daniels & Diaz]: Would require landlords to pay relocation costs when increasing rent over a threshold (10%?). **Any form of making the property owner responsible for relocation costs is a non starter and will create the same results as number 1.**
3. Further Reducing Maximum Income to Rent ratio [CM Daniels & Diaz]: Currently there is no threshold, but this would set maximum income to rent ratio at 2x for most units. **See item B above.**
4. Replaces Pet Deposit with Pet Fees [CM Rumbaugh]: Would provide for a monthly pet fee or pet rent.

Monthly pet fee or pet rent will actually increase the cost of having a pet.

5. Prohibits Dog Breed Restrictions [CM Diaz & Daniels]: Would prohibit excluding a pet based on breed alone. Still allows size/weight restrictions. This will create unreasonable pet restrictions. Dont punish good dogs by prohibiting a breed restriction. Diaz and Daniels must hate pet owners. Pet ownership is a choice. That includes the chosen breed.

I have taken the time to be thorough and thoughtful in my responses to each line item. I hope you have taken the time to read them. The bottom line is fairly simple. **The more risk is increased to the property owner, the more rents will be driven up.** If the council truly believes in affordable housing, they will reject any proposal that increase risk to those that provide it.

Justin Angove

From: wee3kinggs@everyactionadvocacy.com on behalf of Miranda King
<wee3kinggs@everyactionadvocacy.com>
Sent: Thursday, July 6, 2023 6:55 PM
To: Sorum, Doris (Legal)
Subject: Yes to Tenant Rights! No to Competing Measures!

Follow Up Flag: Follow up
Flag Status: Flagged

Dear City Clerk Doris Sorum,

I am writing to urge Tacoma City Council to step back from the threat to launch a competing ballot measure to the Tenant Bill of Rights, which is scheduled for a potential resolution vote at your upcoming June 27th meeting. We respect the hard work of city staff, stakeholders, and council members who drafted the city's proposed changes to the Rental Housing Code. We recommend that you quickly adopt these changes, which complement rather than compete with Initiative 2023-01. Between them, we could win even more comprehensive protections. If they compete, we could all lose.

Bringing a competing ballot initiative would place Tacoma City Council into an alliance with groups like Rental Housing Association and the Multi-Family Housing Association, and in opposition to tenants, organized labor, members of your own stakeholder group, and the growing coalition of community and faith groups behind the Tenant Bill of Rights.

Moreover, manufacturing a false choice between tenant protections is morally indefensible. Regardless of the reason for opposing tenant rights, running a competing initiative that misdirects voters would be rightly seen as a subversion of our democracy and a betrayal of the electorate. It could undermine the legitimacy of the City Council and raise questions about the integrity of council members who support such a move.

Like any bold expansion of rights or regulation, the Tenants Bill of Rights may potentially face legal challenges. But refusing to support a law that is both legal and just simply because of potential challenges would be a failure of good governance.

I strongly urge you and the City Council to reject the proposition of a competing ballot initiative and instead focus on upholding tenant protections that are legal, just, and in the best interests of the Tacoma community. Let us work together to ensure a fair and equitable rental housing environment that respects the rights and well-being of all residents.

Thank you for your attention to this matter. We anticipate your thoughtful consideration and a response that reflects the concerns of the people of Tacoma.

Sincerely,
Miranda King
828 S Steele St Tacoma, WA 98405-3046
wee3kinggs@gmail.com

From: Andrea Reay <andrear@tacomachamber.org>
Sent: Friday, July 7, 2023 4:28 PM
To: Woodards, Victoria; Hines, John; Rumbaugh, Sarah; Blocker, Keith; Ushka, Catherine; Bushnell, Joe; Daniels, Kiara; Diaz, Olgy; Walker, Kristina; City Clerk's Office
Subject: TPCC Letter re: concerns with ordinance 28894
Attachments: ORD28894_Ltr_2.pdf

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Dear Mayor Woodward & Tacoma City Council:

As with our previous letter, we continue to have concerns about Ordinance 28894. Please find our letter attached. This ordinance, and particularly the prohibitions on requiring social security numbers for credit checks and requiring income of more than 2 ½ times the rent, have the potential to *decrease* the number of housing units in Tacoma and *increase* displacement. I encourage you to revise this ordinance to encourage the construction of the additional housing our community profoundly needs.

Please contact me if I can provide more information or context as to why we believe we can do better together to find a solution for Tacoma that is by us and for us.

Best,
Andrea

Andrea H. Reay

President & CEO, Tacoma-Pierce County Chamber

Mobile: (206) 683-4585

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www.tacomachamber.org

TACOMA - PIERCE COUNTY CHAMBER



July 7, 2023

Tacoma City Council
City of Tacoma
747 Market St
Tacoma, WA 98402

RE: Ordinance No. 28894

Honorable Mayor Woodards and Tacoma City Council Members,

I am writing again to express our concerns with Ordinance 28894 and its potential to exasperate an already dire housing crisis. We need more housing of all housing types and we need public policy that encourages public private partnerships to increase investment and boost supply.

Our community needs strong, pragmatic policy to guard against displacement and create more opportunity and access for housing. While well intentioned, the ordinance may have the unintended consequences of actually increasing displacement and reducing investment in housing as local, independent, small business landlords, who are already offering housing do the math for their business and come to the conclusion that they can no longer afford to bear the burden of risk that comes from untested policy.

Specifically, the two items in the ordinance that create the most undue burden for small independent landlords are:

- 1) The prohibition from requiring SSN for tenant screening.
 - a. One of the best indicators for whether a tenant will be able to pay on time is if they have a history of paying on time. Without this data landlords will be assuming greater risk for their investment. If there is another problem that we are trying to resolve by prohibiting the SSN we should have that conversation separately and develop an appropriate solution that does not uniformly burden small, independent businesses.
- 2) The maximum income to rent ratio set at 2.5x.
 - a. One of the reasons we need more housing is that too many households in Tacoma, and across the state, are rent burdened. If property owners are not able to assess whether someone is rent burdened, are we not increasing the likelihood that more in our community will experience this hardship?

Last year Washington State released a SWOT study of our economy. This Business Competitiveness Analysis administered by the Office of the Lieutenant Governor identified housing as one of the top 3 "Big Ideas" that we need to problem solve to create a stronger more equitable economy. As referenced in the study "the underproduction of housing is limiting economic productivity and growth, the creation of jobs, and perpetuating disparate outcomes and wealth inequity for the next generation of Washingtonians."

Please, let's work to truly solve the root of the problem instead of proposing an untested policy that has the potential to create more disparity within our community. Our fervent request is to amend the policy and to include the community in our solution finding by placing the ordinance on the ballot in November.

Please contact me if you have any questions about our work, our position on finding a fix to the housing crisis and how best to engage on this and any of our policy work.

Sincerely,

Andrea H. Reay, Pres./CEO Tacoma-Pierce County Chamber

From: jcmitchell@everyactionadvocacy.com on behalf of Jeannine Mitchell
<jcmitchell@everyactionadvocacy.com>
Sent: Monday, July 10, 2023 3:44 PM
To: Sorum, Doris (Legal)
Subject: Yes to Tenant Rights! No to Competing Measures!

Follow Up Flag: Follow up
Flag Status: Flagged

Dear City Clerk Doris Sorum,

I am writing to urge Tacoma City Council to step back from the threat to launch a competing ballot measure to the Tenant Bill of Rights, which is scheduled for a potential resolution vote at your upcoming June 27th meeting. We respect the hard work of city staff, stakeholders, and council members who drafted the city's proposed changes to the Rental Housing Code. We recommend that you quickly adopt these changes, which complement rather than compete with Initiative 2023-01. Between them, we could win even more comprehensive protections. If they compete, we could all lose.

Bringing a competing ballot initiative would place Tacoma City Council into an alliance with groups like Rental Housing Association and the Multi-Family Housing Association, and in opposition to tenants, organized labor, members of your own stakeholder group, and the growing coalition of community and faith groups behind the Tenant Bill of Rights.

Moreover, manufacturing a false choice between tenant protections is morally indefensible. Regardless of the reason for opposing tenant rights, running a competing initiative that misdirects voters would be rightly seen as a subversion of our democracy and a betrayal of the electorate. It could undermine the legitimacy of the City Council and raise questions about the integrity of council members who support such a move.

Like any bold expansion of rights or regulation, the Tenants Bill of Rights may potentially face legal challenges. But refusing to support a law that is both legal and just simply because of potential challenges would be a failure of good governance.

I strongly urge you and the City Council to reject the proposition of a competing ballot initiative and instead focus on upholding tenant protections that are legal, just, and in the best interests of the Tacoma community. Let us work together to ensure a fair and equitable rental housing environment that respects the rights and well-being of all residents.

Thank you for your attention to this matter. We anticipate your thoughtful consideration and a response that reflects the concerns of the people of Tacoma.

Sincerely,
Jeannine Mitchell
3708 N Cheyenne St Tacoma, WA 98407-4812 jcmitchell@net-venture.com

From: Cathie Raine <cjrRD@hotmail.com>
Sent: Monday, July 10, 2023 5:12 PM
To: City Clerk's Office
Subject: July 11,2023 Tacoma City Council Meeting (Public Comments)

Follow Up Flag: Follow up
Flag Status: Flagged

Dear City Council members and Mayor Woodards:

I am submitting comments on Resolutions 411235(#8) and 41236 (#9) on the 4/11/23 City Council Meeting Agenda for the 'Public Comments'.

I want to share the following concerns:

1. RESOLUTION 411235....This proposed apartment building (with 20 apartments and 1 parking stall) will be built in an already over-crowded area of South Tacoma. Greater than 6 other apartment buildings are in the process of being built within 1/2 mile of this property. This apartment situation is not offering any on site parking for the residents... as is the case with the minimal available parking with the other recently approved apartment building projects.

It is unreasonable to expect that this area can accommodate much in the way of additional street parking. In addition, the future of available, reliable public transit is unknown as this site is located less than 1 mile from the 'Bridge Point Tacoma' 'mega-warehouse' project (you know: the approved plan to build the 2.5 million sq ft distribution/fulfillment center in South Tacoma). This 'Bridge Point Tacoma' structure is calculated to generate an additional 10,000-12,000 vehicle trips daily over area streets. The impacts of these massive amounts of additional vehicle trips on area public transit systems was not studied with the 'Transportation Impact Assessment' completed in 12/2021 and then submitted with the Bridge Industrial Company LU21-0125 Permit application in early 2022). Therefore, it would be irresponsible to approve yet the construction of another apartment building in this Tacoma Mall sub-area with no/minimal off-site parking available to its residents. There is no guarantee that reasonable transit services would be available to any residents living in this part of Tacoma. Please note: other apartment buildings are currently under construction nearby that will NOT be offering any 'regulated rate' units (therefore no application for MFTE)....and, minimal parking on-site is available is being offered. These residents will struggle to find a place to park vehicles anywhere close to these buildings.

(Really a 'Construction Moratorium' needs to be considered for this Tacoma Mall housing area until the 'Bridge Point Tacoma' project related traffic impacts on South Tacoma are fully studied).

2. RESOLUTION 41236...This proposed apartment building with 120 units (24 units at 'regulated rates) offers 47 parking stalls and would likely involve the removal of 3 houses along with a number of mature trees/wooded area. This area would also be located very close to I-5 (Yakima street overpass) and just north of Lincoln Park/Lincoln High School area. Due to the number of units combined with the limited available off-street parking stalls, the street parking of vehicles along S Thompson Street could adversely impact the public's use of Lincoln Park. In addition, locating an apartment building close to busy I-5 would be exposing residents (including low-income individuals) to increased levels of air pollutants from a known traffic-congested, idling vehicles area on I-5 (near Tacoma Dome). This site would be an unhealthy area for a 120 Unit building.

The City Council members and Mayor need to be considering the locations to be used with both of these proposed apartment buildings.

The Tacoma Mall sub-area is being over-built..with little consideration of the health and environmental CUMULATIVE impacts of these multiple projects. The FEIS (Final Environmental Impact Statement) that was completed years ago for the Tacoma Mall Mixed Use Development area needs to be updated. The impacts of this nearby 'Bridge Point Tacoma' project (located just 1 mile from the Mall) needs to be considered before further housing construction occurs in South Tacoma.

Please do not approve these 2 apartment construction plans without further study of the impacts of these proposed projects on the current neighborhood situations. Please do not rush to approve these types of building projects.

Respectfully submitted,
Cathie (Raine) Urwin
South Tacoma resident

Phone #: (253) 431-6689

From: Haigh, Susan (Legal)
Sent: Tuesday, July 11, 2023 8:33 AM
To: City Clerk's Office
Subject: Fw: Rental Housing Code

Follow Up Flag: Flag for follow up
Flag Status: Flagged

From: Jason Van Cleese <jasonvancleese@gmail.com>
Sent: Tuesday, July 11, 2023 6:27 AM
To: Lee, Maria <maria.lee@cityoftacoma.org>
Subject: Rental Housing Code

As a small business owner and landlord myself in King and Pierce County, I think that what they are proposing is ill thought out. These city councilmembers need to get their heads straight and make some educated choices.

FYI see below:

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PRESS RELEASE

We expect a strong media presence for tomorrow's council vote. Today we sent out the following press advisory:

Amid Growing Opposition, Tacoma City Council to Vote on Competing Ballot Initiative

TACOMA, WA – Despite vocal opposition from labor unions and community groups, the Tacoma City Council is scheduled to vote Tuesday on a competing tenant policy designed to derail Citizens' Initiative 2023-01, known as the Tenant Bill of Rights. At least two council members, Kiara Daniels and Olgy Diaz, have already signaled their opposition.

"With this vote, the City Council risks losing all legitimacy as advocates for housing justice," said Tacoma for All Campaign Manager Ty Moore. "They have no support from tenant groups, including those on their own Stakeholder Advisory Group. They have no support from labor unions, no community groups, no housing justice organizations. With the exception of landlord groups, they are politically isolating themselves against our broad and growing coalition behind the Tenant Bill of Rights."

The Mayor and council members sponsoring the proposed changes to the Rental Housing Code have repeatedly claimed they were guided by a Stakeholder Advisory Group the city convened two years ago, bringing together landlord and tenant groups. However, tenant advocates from five of the organizations in the Stakeholder Advisory Group intend to speak in opposition to a competing ballot initiative on Tuesday, and three of those organizations have now endorsed the Tenant Bill of Rights (the Low Income Housing Alliance, Tenant Law Center, and Tacoma Tenants Union).

Moore noted that Tacoma for All, the organization that initiated the Tenant Bill of Rights citizens' initiative, supports most of the city's proposed Rental Housing Code changes, which includes many positive policies not included in the Tenant Bill of Rights. The two sets of policies have limited overlap, and complement more than compete with each other.

"Instead of taking the side of landlords and forcing voters into a confusing and false choice in November, they can simply pass their proposed Rental Housing Code changes right now to help the people of Tacoma immediately," Moore pointed out. "Then let voters decide in November if they also want the more robust protections in our Tenant Bill of Rights like relocation assistance for economic evictions, alongside winter and school-year eviction protections."

Tacoma for All is a grassroots and volunteer-led coalition that seeks sustainable and affordable housing and is preparing to bring a citizens' initiative, the Tenant Bill of Rights, to Tacoma voters on the November ballot. More information: www.Tacoma4All.org.

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JULY 10, 2023

TO: MAYOR WOODARDS, CITY MANAGER PAULI,
CITY ATTORNEY FOSBRE AND ALL MEMBERS OF
TACOMA'S CITY COUNCIL

For the past six months I have been "connecting the dots" about Native American genocide and presenting it to this City Council to support a Native American Genocide Resolution for a eventual national one. It is evident to me that this City Council does not possess the necessary "critical thinking" skills to overcome local tribal thinking!

The City's "ANTI-RACIST" campaign from my viewpoint will be "forever hollow" by not addressing the genesis of American racism and accompanying "VIOLENCE". When a white settler could come out West and claim 50 acres under the "HOMESTEAD ACT" - whose land did you think he claimed? The state, county and city "INCORPORATIONS" were the collective equivalent of the HOMESTEAD ACT - whose land did they incorporate? When you could kill a Indian as a "savage" and take his scalp for a \$40. (child) \$60. (spaw) \$100. (brow) bounty, it "set the tone" for American violent character that is present in our streets today. As Stokely Carmichael once said "violence is American as apple pie!"

PAGE 1, CONT.

While the "hundreds of thousands" of Native American lives claimed in their genocide can not be returned, nor land taken in problematics, ~~a~~ National Native American Resolution would have been a "form of apology" for historical transgressions against Native American. Also, it would have opened up a national conversation about the issues of racism and violence that affects everyone.

As a "professional" military member and veteran and a student of military history, I see a connection between our domestic racism and violence and the way we conduct foreign war abroad. We conduct them as if we were "still killing Indians" with a strong racist element, and without regard to consideration for non-combatants. The boxer Muhammad Ali said it best when he said, "Why do I want to go to Viet Nam to kill brown people?" That single war resulted in the deaths of over "two million" Vietnamese! And the soldiers had a long list of "racial slurs". This City Council has missed the boat about the root cause of racism and violence!

SINCERELY,
 Michele Reich
 MICHELE REICH
 P.O. BOX 110433
 TACOMA, WA. 98411

From: Tami Jackson <tamijackson@gmail.com>
Sent: Wednesday, July 5, 2023 9:12 AM
To: Sorum, Doris (Legal)
Subject: Stop the fireworks!

Follow Up Flag: Follow up
Flag Status: Flagged

This is a complaint for my neighborhood council and for the City of Tacoma!

Last night, my neighbors from ALL sides of my home kept setting off so many loud explosions it kept activating my pickup's alarm. The fireworks came from across the street, from the alley behind, from neighbors on both the left and right, from Blueberry Park and from 72nd Avenue and beyond.

After enduring many HOURS of exploding rocket booms and screaming banshee-type rocket flares my nerves were over the edge! My dogs, who usually tolerate gun blasts and occasional fireworks were frantically clawing and scratching at the walls. The thick poisonous smoke was so heavy it was quite difficult to breathe and that suffocating toxic cloud stung the eyes!

The explosions continued for Hours and lasted well into the night. They were still blasting past 2am when most people needed sleep to go to work later on this day.

I have never endured the war-zone type of July 4th celebration that this year presented. It's time my neighborhood council and the city of Tacoma FINALLY enforced the existing "no fireworks" laws!

Please do your civic duty and put a stop to this type of City mayhem!

From: Geff R. <geff@dandyllionrecords.com>
Sent: Wednesday, July 5, 2023 7:43 PM
To: City Clerk's Office
Subject: Written Comment For City Council Regarding Fireworks Laws

Follow Up Flag: Flag for follow up
Flag Status: Flagged

The 2002 law banning safe & sane fireworks has caused a nightmare for the citizens of Tacoma & Pierce County.

It has removed all incentive to use "safe & sane fireworks". I spoke with the Tacoma PD in 2002 about this & the officer stated that he agreed with me, & that the law would fail due to lack of officers to enforce it.

The only solution I see is with the City & County councils:

1. They must admit that banning "Safe & Sane" Fireworks in 2002 has been a disaster.
2. Rescind that law.
3. REQUIRE that the Tacoma Police & PC Sheriff enforce the illegal fireworks law. Any officer that refuses would be terminated. Set up roadblocks in June & July where tribal land becomes USA land. Search ALL cars for illegal fireworks & confiscate. King County used to do this at Muckleshoot.

Right now, banning safe & sane fireworks (i.e. not dangerous) has removed any and all incentive for at least regular citizens to follow the law. And if they have to, hire armed security officers to augment the forces the week of July 4th.

Geff Ratcheson

Dem PCO 29-243
425-736-3214

From: Brittany Shands <brittshands@gmail.com>
Sent: Saturday, July 8, 2023 10:58 AM
To: City Clerk's Office
Subject: Written Comment

Follow Up Flag: Follow up
Flag Status: Flagged

Please, please, PLEASE do something about the illegal use of fireworks. People are lighting them up to a week before the holiday and a week after. My animals are terrified and have to be drugged into a stupor just to cope.

From: Jodie Lawson <jodie.lawson@comcast.net>
Sent: Tuesday, July 11, 2023 5:03 PM
To: City Clerk's Office
Cc: MARK 😊
Subject: Considerations for today's City Council meeting

Follow Up Flag: Follow up
Flag Status: Flagged

Greetings!

I am writing you today as a life long member of the Tacoma community and local housing provider. My husband and I have grown up in Tacoma and are products of Tacoma Public Schools and the University Place Schools. After college we CHOSE to return to our home town and put down roots. We did this by buying our first house in North Tacoma. As a family we moved to a larger home and rented our first home. This snowballed into a business we grew over the past 27 years. We now are very proud owners of almost 180 units of housing in Tacoma. We have prided ourselves on being a “mom and pop” business -this is our sole business and full time jobs and how we support our family. It was important to us that we could meet, interact and get to know our tenants and their situations. We always tried to give people opportunities and took chances when prospective tenants had challenges in their background. Sometimes our gamble paid off and sadly other times it did not and we had to use the legal process to move on from a tenant who was no longer able to care for the unit, pay the rent , or was disruptive to the neighboring tenants. As Landlord-Tenant regulations have strengthened we have had to consider adjusting some of our criteria in order to continue to be able to maintain our properties as safe, clean and desirable for all prospective tenants. I ask you to consider the impact the two programs you will be evaluating and voting on – not just the impact on housing providers but also the unintended impact of those tenants who will find it more difficult to find affordable, quality housing. We take tremendous pride in caring for our units – I would invite you to drive by any of our properties through out the city. The buildings are nicely painted, landscaping is cared for, trash is picked up. Maintenance is done when needed, deferred maintenance is addressed proactively. At the same time, our property taxes have skyrocketed, insurance is increasing at a faster pace each year, cost of goods and services is going up. And for the first time in the past 27 years I am carrying a balance sheet of over \$55,000 in delinquencies from tenants who are not paying the rent currently. How do I pay my mortgage payment during the months of November-April if my tenants choose not to pay due to a ban on evictions during the school year? How can a tenant ever catch up if they become 9 months in arrears on rent? The last thing I ever want is to have to complete an eviction process with a tenant – it is a heart breaking process for all involved. However, what is the limit on how long we as housing providers and all of our other tenants who ARE paying rent will be able shore up those who cannot.

In reviewing the considerations of the RHC proposed changes and the Landlord Fairness Code changes I implore you to consider the adoption of the proposed changes to the RHC. The changes proposed were developed with input from both housing providers and residents and is a reflection of being able to work together to create a community where both tenants and those who provide housing are valued.

I appreciate the work you do and ask that you give us a chance to continue to create quality, affordable housing in Tacoma.

Thank you!

Jodie Lawson
(253) 820-0762

From: Betty Beer <betty@lasawa.org>
Sent: Tuesday, July 11, 2023 5:35 PM
To: City Clerk's Office
Subject: Landlord Tenant

Follow Up Flag: Follow up
Flag Status: Flagged

Good Evening,

My name is Betty Beer I have been working with homeless families for 25 years. I work for a private non-profit and I would just like to give you all a little insight as to the effects of not being able to evict families due to the covid moratorium.

We are currently owed over \$40,000 in back rent, most of these units are subsidized, or affordable housing. Most of our tenants received rental assistance more than once.

We were recently allowed to begin evictions, one of the units we had to wait on the eviction, was in the unit 1 year 3 months, the unit had new carpet, and flooring, so far we have flea bombed 5 times, there are still fleas, we hauled away at least 8 loads to the dump, which included human feces, animal feces and every piece of nasty furniture. All carpet was removed, yes we still have fleas.

By putting such restrictions for evictions you're not just hurting wealthy landlords, you're hurting everyone. I realize it is not you supporting the "winter, school year" piece of what Tacoma for all is proposing, but please realize most schools start in August and end in June, that would allow July and maybe August to evict.

Please hold your ground, I would love to send pictures, of our trashed unit (which the commissioner gave an extra month to the tenant, out of pity). I would also be willing to speak more regarding what can really happen when evictions are not allowed, and the effects it has on the entire community.

Thank You,
Betty Beer

Sent from my Verizon, Samsung Galaxy smartphone

From: Michael Robinson <michaelr@windermere.com>
Sent: Tuesday, July 11, 2023 5:54 PM
To: Woodards, Victoria; Hines, John; Rumbaugh, Sarah; Blocker, Keith; Ushka, Catherine; Bushnell, Joe; Daniels, Kiara; Diaz, Olgy; Walker, Kristina; City Clerk's Office
Cc: andreareay@tacomachamber.org
Subject: RE: Ordinance No. 28894

Follow Up Flag: Follow up
Flag Status: Flagged

Honorable Mayor Woodards and Tacoma City Council Members,

I am writing to express my concerns with Ordinance 28894 and its potential to exasperate an already dire housing crisis in the South Sound.

My business is Warner Street Apartments, Talisman Apartments, Conquistador Apartments and several other properties. We've been operating in Tacoma for 18 years and employ approximately 4 people + support many vendors.

This ordinance, and particularly the prohibition on requiring social security numbers for credit checks, and the income restrictions have the potential to decrease the number of housing units in Tacoma, which will negatively impact my ability to attract and retain workers. I encourage you to revise this ordinance to encourage the construction of the additional housing our community sorely needs.

There are good housing providers and admittedly there are some bad housing providers. We are definitely in the prior group of housing providers that take pride of ownership in our properties. We are responsive to our tenants & keep very well maintained property conditions. I submit to you there are also good tenants and there are bad tenants. Without reasonable accountability, penalties & controls for a housing provider to assess while protecting their property and protect their good tenants we are vulnerable to unreasonable safety issues and costly damages that are extremely difficult to absorb.

I also encourage you to allow the community to be part of solution finding. Please do not pass this ordinance as is without allowing the community to be part of the conversation. We appreciate the urgency the Council has acted in addressing the housing crisis, but we need the right solution, not necessarily the first solution that failed to include other business or community stakeholders.

Please contact me if I can provide more information or context as to why we believe we can do better together to find a solution for Tacoma that is by us and for us.

Thank you,



Michael Robinson

Robinson Marketing PS, Inc.

Mobile 253-219-1932

Web

www.MichaelRobinsonProperties.com

Email

michaelr@windermere.com

2661 North Pearl Street - #388,
Tacoma WA 98407

From: Sarah Asay <sarah@acegrouphomes.com>
Sent: Tuesday, July 11, 2023 6:01 PM
To: Woodards, Victoria; Hines, John; Rumbaugh, Sarah; Blocker, Keith; Ushka, Catherine; Bushnell, Joe; Daniels, Kiara; Diaz, Olgy; Walker, Kristina; City Clerk's Office
Cc: andreareay@tacomachamber.org
Subject: RE: Ordinance No. 28894

Follow Up Flag: Follow up
Flag Status: Flagged

Honorable Mayor Woodards and Tacoma City Council Members,

I am writing to express my concerns with Ordinance 28894 and its potential to exacerbate an already dire housing crisis in the South Sound.

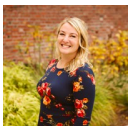
My business is Ace Group Homes and we've been operating in Tacoma for nearly 10 years and employ 4 people.

This ordinance, and particularly the prohibition on requiring social security numbers for credit checks, and the income restrictions have the potential to decrease the number of housing units in Tacoma, which will negatively impact my ability to attract and retain workers. I encourage you to revise this ordinance to encourage the construction of the additional housing our community sorely needs.

I also encourage you to allow the community to be part of solution finding. Please do not pass this ordinance as is without allowing the community to be part of the conversation. We appreciate the urgency the Council has acted in addressing the housing crisis, but we need the right solution, not necessarily the first solution that failed to include other business or community stakeholders.

Please contact me if I can provide more information or context as to why we believe we can do better together to find a solution for Tacoma that is by us and for us.

Sarah



sarah asay
realtor

206-310-0683 | sarahasay.com | 2604 6th Ave, Tacoma



[Create your own email signature](#)

From: AJ Gomez <ajg@global4security.com>
Sent: Tuesday, July 11, 2023 7:13 PM
To: Woodards, Victoria; Hines, John; Rumbaugh, Sarah; Blocker, Keith; Ushka, Catherine; Bushnell, Joe; Daniels, Kiara; Diaz, Olgy; Walker, Kristina; City Clerk's Office
Cc: andreareay@tacomachamber.org
Subject: RE: Ordinance No. 28894

Follow Up Flag: Follow up
Flag Status: Flagged

Honorable Mayor Woodards and Tacoma City Council Members,

I am writing to express my concerns with Ordinance 28894 and its potential to exasperate an already dire housing crisis in the South Sound.

My business is Global Security & Communication, Inc. and we've been operating in Tacoma for 20 years and employ 32 people in WA and 6 locally.

This ordinance, and particularly the prohibition on requiring social security numbers for credit checks, and the income restrictions have the potential to decrease the number of housing units in Tacoma, which will negatively impact my ability to attract and retain workers. I encourage you to revise this ordinance to encourage the construction of the additional housing our community sorely needs.

I also encourage you to allow the community to be part of solution finding. Please do not pass this ordinance as is without allowing the community to be part of the conversation. We appreciate the urgency the Council has acted in addressing the housing crisis, but we need the right solution, not necessarily the first solution that failed to include other business or community stakeholders.

I have also been a landlord. When it is harder on them, it is harder on tenants! Unintended consequences!

Please contact me if I can provide more information or context as to why we believe we can do better together to find a solution for Tacoma that is by us and for us.

Thank you for your consideration.



AJ Gomez
President



Global4Security.com

[\(800\) 446-2400](tel:(800)446-2400) / [\(360\) 693-1900](tel:(360)693-1900)

AJ@Global4Security.com

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From: Darin Shedd <dshedd@absvaluation.com>
Sent: Tuesday, July 11, 2023 8:21 PM
To: Woodards, Victoria; Hines, John; Rumbaugh, Sarah; Blocker, Keith; Ushka, Catherine; Bushnell, Joe; Daniels, Kiara; Diaz, Olgy; Walker, Kristina; City Clerk's Office
Cc: andreareay@tacomachamber.org
Subject: RE: Ordinance No. 28894

Follow Up Flag: Follow up
Flag Status: Flagged

Honorable Mayor Woodards and Tacoma City Council Members,

I am writing to express my concerns with Ordinance 28894 and its potential to exasperate an already dire housing crisis in the South Sound.

My business is ____real estate renovation _____ and we've been operating in Tacoma for ____20____ years and employ ____10____ people.

This ordinance, and particularly the prohibition on requiring social security numbers for credit checks, and the income restrictions have the potential to decrease the number of housing units in Tacoma, which will negatively impact my ability to attract and retain workers. I encourage you to revise this ordinance to encourage the construction of the additional housing our community sorely needs. You can't suspend the rules of supply and demand. It economic illiteracy to propose this ordinance. If you want less housing(ie supply) then making it uneconomical will get you that result. Developers will not build more housing to meet the demand with this ordinance. They will build elsewhere.

I also encourage you to allow the community to be part of solution finding. Please do not pass this ordinance as is without allowing the community to be part of the conversation. We appreciate the urgency the Council has acted in addressing the housing crisis, but we need the right solution, not necessarily the first solution that failed to include other business or community stakeholders.

Please contact me if I can provide more information or context as to why we believe we can do better together to find a solution for Tacoma that is by us and for us.

Darin Shedd, MAI
Principal
ABS Valuation
419 Berkeley Avenue, Suite A
Fircrest, WA 98466
253-274-0099 Option 1
dshedd@absvaluation.com

From: Bo Brenneman <Bo.Brenneman@caliberhomeloans.com>
Sent: Wednesday, July 12, 2023 9:35 AM
To: Woodards, Victoria; Hines, John; Rumbaugh, Sarah; Blocker, Keith; Ushka, Catherine; Bushnell, Joe; Daniels, Kiara; Diaz, Olgy; Walker, Kristina; City Clerk's Office
Cc: andreareay@tacomachamber.org
Subject: RE: Ordinance No. 28894

Follow Up Flag: Follow up
Flag Status: Flagged

Honorable Mayor Woodards and Tacoma City Council Members,

I am writing to express my concerns with Ordinance 28894 and its potential to exasperate an already dire housing crisis in the South Sound.

My business is Caliber Home Loans and we've been helping people on a path to home ownership in Tacoma for many years and we employ a couple dozen people.

This ordinance, and particularly the prohibition on requiring social security numbers for credit checks, and the income restrictions have the potential to decrease the number of housing units in Tacoma, which will negatively impact my ability to attract and retain workers. I encourage you to revise this ordinance to encourage the construction of the additional housing our community sorely needs.

I also encourage you to allow the community to be part of solution finding. Please do not pass this ordinance as is without allowing the community to be part of the conversation. We appreciate the urgency the Council has acted in addressing the housing crisis, but we need the right solution, not necessarily the first solution that failed to include other business or community stakeholders.

Please contact me if I can provide more information or context as to why we believe we can do better together to find a solution for Tacoma that is by us and for us.

Sincerely,

Bo Brenneman

We care about our customers' personal information. Please contact the appropriate parties to verify any emails requesting personal/financial information or requesting funds to be wired, prior to taking any action.

This electronic transmission and any documents or other writings sent with it constitute confidential information, which is intended only for the named recipient. If you are not the intended recipient, please reply to the sender that you have received the message in error and delete it. Any disclosure, copying, distribution or the taking of any action concerning the contents of this communication or any attachment(s) by anyone other than the intended recipient is strictly prohibited. Caliber Home Loans, Inc. 1525 S. Belt Line Road, Coppell, TX 75019. Equal Housing Lender. NMLS # 15622

From: Bethany Doane <bdoane@jayray.com>
Sent: Wednesday, July 12, 2023 9:59 AM
To: Woodards, Victoria; Hines, John; Rumbaugh, Sarah; Blocker, Keith; Ushka, Catherine; Bushnell, Joe; Daniels, Kiara; Diaz, Olgy; Walker, Kristina; City Clerk's Office
Cc: Andrea Reay; andreareay@tacomachamber.org
Subject: Ordinance #28894
Attachments: COT ORD #28894.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Bethany Doane
She/her
JAYRAY A PLACE TO THINK
Branding | Advertising | Strategic Communications
535 Dock Street, Suite 205 | Tacoma, WA 98402
O: 253.284.2530 | C: 253.414.4830



Tacoma City Council
City of Tacoma
747 Market St
Tacoma, WA 98402

RE: Ordinance No. 28894

Honorable Mayor Woodards and Tacoma City Council Members,

I am writing to express my concerns with Ordinance 28894 and its potential to exasperate an already dire housing crisis in the South Sound.

I am one of the owners of JayRay Ads & PR, operating in Tacoma for over 50 years. We are a small business employing 13 people.

This ordinance, and particularly the prohibition on requiring social security numbers for credit checks, and the income restrictions have the potential to decrease the number of housing units in Tacoma, which will negatively impact my ability to attract and retain workers. Although I only employ 13 people, our office on Dock Street serves as a front row to some of the consequences of a large homeless population, and I fear this Ordinance will only serve to exacerbate these issues. I encourage you to revise this ordinance to encourage the construction of the additional housing our community sorely needs.

I also encourage you to allow the community to be part of solution finding. Please do not pass this ordinance as is without allowing the community to be part of the conversation. We appreciate the urgency the Council has acted in addressing the housing crisis, but we need the right solution, not necessarily the first solution that failed to include other business or community stakeholders.

I believe we can do better together to find a solution for Tacoma.

Sincerely,

Bethany Doane
Operations Manager & Principal
JayRay Ads & PR, Inc.

From: Scott Welsh <tacomaauto@gmail.com>
Sent: Wednesday, July 12, 2023 11:13 AM
To: Woodards, Victoria; Hines, John; Rumbaugh, Sarah; Blocker, Keith; Ushka, Catherine; Bushnell, Joe; Daniels, Kiara; Diaz, Olgy; Walker, Kristina; City Clerk's Office
Cc: andreareay@tacomachamber.org
Subject: RE: Ordinance No. 28894

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Honorable Mayor Woodards and Tacoma City Council Members,

I am writing to express my concerns with Ordinance 28894 and its potential to exacerbate an already dire housing crisis in the South Sound.

My business is Courtesy Auto Service & Tire of Tacoma and we've been operating in Tacoma for 20 years and employ 8 people.

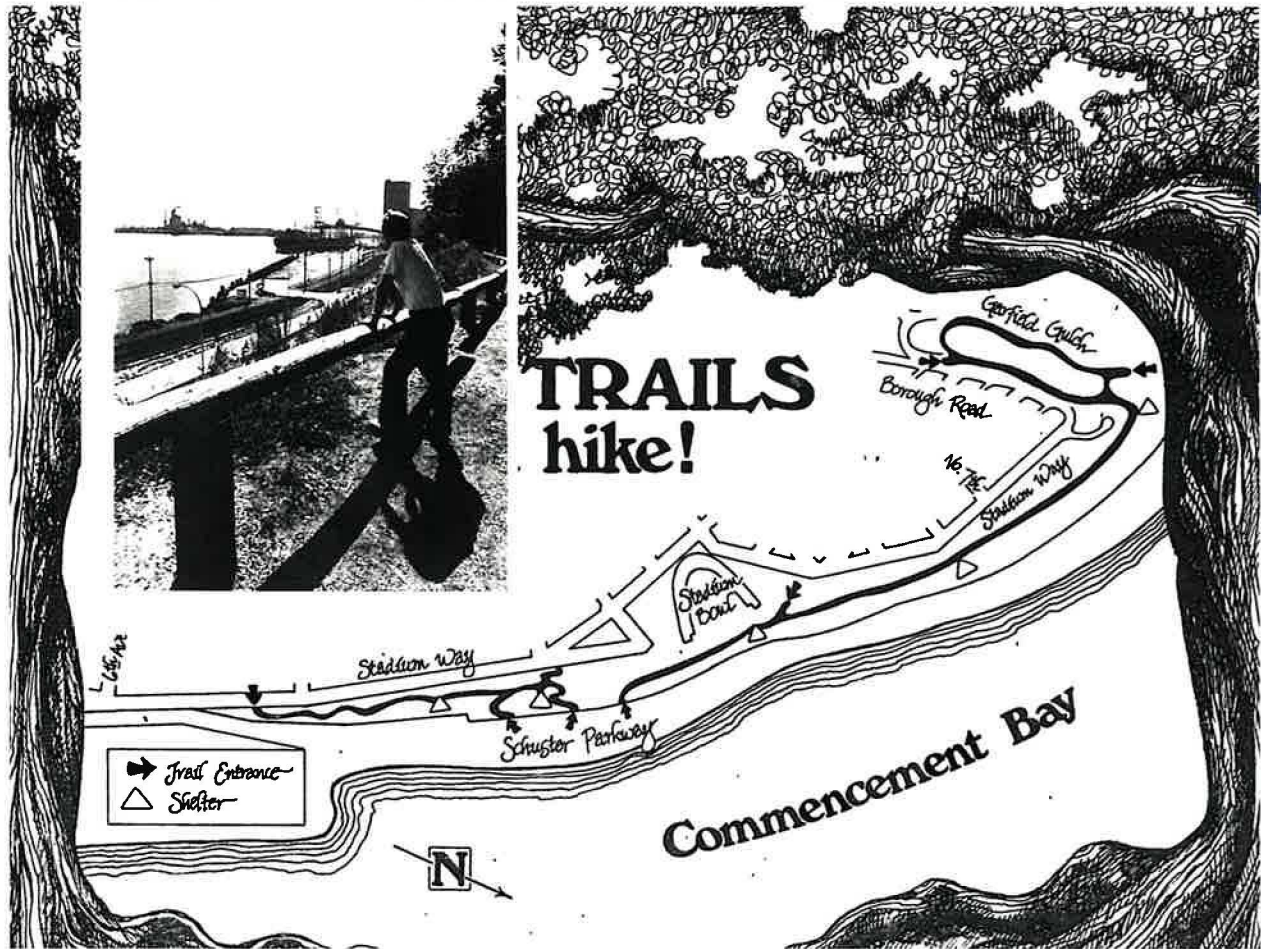
This ordinance, and particularly the prohibition on requiring social security numbers for credit checks, and the income restrictions have the potential to decrease the number of housing units in Tacoma, which will negatively impact my ability to attract and retain workers. I encourage you to revise this ordinance to encourage the construction of the additional housing our community sorely needs.

I also encourage you to allow the community to be part of solution finding. Please do not pass this ordinance as is without allowing the community to be part of the conversation. We appreciate the urgency the Council has acted in addressing the housing crisis, but we need the right solution, not necessarily the first solution that failed to include other business or community stakeholders.

Please contact me if I can provide more information or context as to why we believe we can do better together to find a solution for Tacoma that is by us and for us.

Scott Welsh
President
Courtesy Auto Service & Tire of Tacoma

This is how the Bay Side Trails looked in 1975. They could be this way again.



What happened?

This trail system was designed and built in the 1970s as part of the development of Schuster Parkway. It served our community for decades, providing a place to walk and enjoy nature in the middle of the city. By 2011 cuts to funding led to a deterioration in the trails. To prevent homeless from living on the trails, the city blocked off much of the system. The irony is that's made the problem worse. Now homeless campers are the primary users of our park.

What can you do?

1. **Use the Trails** - If more people use the trails, more people will defend them. Use the trails and let others know about them!
2. **Trail Maintenance and Cleanup** - Bring a trash bag when you walk the trail and clean up garbage. Cut some vines. Or just eat some invasive blackberries.
3. **Report Camping**
 - **Call the police non emergency line** at 253 287 4455. They'll likely tell you it's not their job to remove illegal campers. Tell them it is, in fact, their job to enforce our laws. Demand they do so.
 - **Call 311** and ask them to remove illegal campers.

Longer term we should work to make the city understand their job is to keep public spaces open and accessible to their employers – voting and tax paying citizens. We're organizing on Facebook. Scan the QR code to learn more.



CARL D. TEITGE
815 N. STADIUM WAY
TACOMA, WA. 98403
(253) 377-0492
(253) 844-4953 FAX
teitge@comcast.net

July 11, 2023

Executive Team
Kurtis Kingsolver
Deputy City Manager
Room 1200
Tacoma WA. 98402
Re: LID #8663 N. 48th and Mullen St. Tacoma 98407

This has come down to the critical planning stage and until now this has been decided in the dark with no apparent consideration for our specific concerns addressed to the LID Department. Ralph Rodriguez informed owners on **May 5, 2023, that the LID #8663 plans would be out for bid in August 2023 and anticipating fall 2023 construction.** I will be on a much-needed vacation with our extended family in Oregon from July 22 to August 3, 2023. My time is short for resolution. Fall is also a terrible time to start a utility and road construction project with the known soils in the road and steep slope areas. This can create havoc or significant cost acceleration.

Our questions to Ralph Rodriguez started in January 2023 after I asked for any updated plans for LID #8663 and was stunned to receive back a plan that included a Branch Hammerhead Turnaround in front of our three lots at 4808 N. Mullen. I immediately called Ralph and asked for an explanation. Ralph stated that the movement of the Hammerhead from the end of Mullen Street required by Tacoma Design Manual 6.10 Figure 4-12 to a the Branch Hammerhead Figure 4-11 in front of our three 4808 N Mullen lots was required because an **unnamed person with no identified qualifications stated there is an unwritten City of Tacoma policy that no residences may have vehicle access off any Hammerhead Turnaround. This is contrary to the written City of Tacoma Design Manual 6.10 and the existing built dead ends in Tacoma which does not prevent access from a residence to a roadway through a Hammerhead of any type.**

I wrote to Ralph Rodriguez on March 7, 2023, about this decision and listed exhibits all the dead ends streets close to steep slope neighborhoods in North Tacoma from South 7th and Stadium Way to the City of University Place at South 19th that have no turnarounds. I also listed the existing Hammerheads, Branch Hammerheads and small cul-de -sacs in the same area. All the existing Hammerheads allowed residential vehicle access from the Hammerhead. In one recent instance the City of Tacoma closed off a

Street Park St. that used to access on N. Pearl St. to allow a circular entrance and exit at Pt. Defiance Park but constructed with no turnaround. I understand that the Manual maybe deviated from based upon sound engineering practices. Ex. KK 7/11 EX B. I received no response. I also agree that CTDM 6.9 that dead ends roadways shall not be allowed without approval of the City Traffic Engineer. Ex. KK 7/11 Ex.C. However, N. Mullen is not a new street, there have been no complaints about access and there are hundreds of other Dead-End Streets in Tacoma that are not addressed. Some I have seen like N Skyline Drive are over 1200 feet with no turnaround.

On April 4, 2023, I followed up with a letter with attached numerous Exhibits which again contradicted RR's stated oral policy that no residential vehicle access was allowed from a Hammerhead I the City of Tacoma Design Manual sections that contradicted this questionable oral policy. This included the City of Tacoma Design Manual Provision which covered the Design, Standard details of Hammerheads and Branch Turnarounds and the required type and location to be used depending on number of lots served and location of the turnaround. I have received no response.

On May 26 I wrote to Ralph Rodriguez asking if my concerns had been considered or forwarded to anyone since I had not heard back. The response was I received an email on May 30, 2023, **"Yes I received the earlier email, the plans are being routed to the various city groups for review, I thought it best to wait to review the comments to see if there are any recommended changes to the plans. Once reviewed a response will be sent."**

We are still waiting for a response which is now almost four- and one-half months.

We cannot go forward with our plans for housing on our lots without certainty of what damage the construction LID #8663 is creating.

The City of Tacoma does not allow new road paving to be cut into for 5 years. I am 77 years old. As the owner of three undeveloped lots at 4808 N. Mullen, I must plan how my three lots are configured, how to get TPU power, PSE gas, telephone, cable and other utilities underground (including TPU electrical power) without knowing what the final design elements of the N. Mullen St. right of way improvements are going to be and where they are located. We have no idea how our lots may be accessed even by human walking traffic when the sidewalk is removed by a Branch Type Hammerhead Turnaround and limited parking resulting from the newest LID #8663 plans. **Sidewalks are required on all lot frontages including 4808 N. Mullen ST. City of Tacoma Design Manual Table 4-6 page 4-27. Exhibit KK 7/1 EX D.**

I have followed these improvements since I owned the undeveloped lots, so I was concerned changes might be made to LID #8663. I was notified in late January 2023 of major changes. I doubt any other property owners were given notice of these significant changes.

The only information returned on my inquiries by Ralph Rodriguez was on June 21, 2023, that the cost of creating one bump in parking spot in front of 4806 N. Mullen would be about \$3,600.

ISSUES WITH THE CHANGES TO LID #8663

THESE ARE LEGAL ISSUES NOT ENGINEERING ISSUES. THE PROPERTY OWNERS IN LID # 8663 ARE THE ONES WHO APPROVED LID# 8663 AND HAD TO BASE THEIR DECISIONS ON THE 2019 DRAWING. THE PROPERTY OWNERS AGREED TO SUPPORT THE LID #8663 AND HAVE AGREED TO PAY FOR THE BENEFIT THAT WOULD BE ADDED TO THEIR PREPROPERTY VALUE. AT THE END OF THE LID PROCESS THE OWNERS CAN ONLY BE CHARGED ON THE BASIS OF THE APPRAISED VALUE OF THE BENEFIT TO THEIR PROPERTY WHICH HAD BEEN GUESSED AT THE BEGINNING OF THE PROCESS.

WHEN SIGNIFICANT CHANGES HAVE BEEN MADE TO THE ENGINEERING DESIGNS, THESE CHANGES SHOULD BE RE-APPROVED BY THE PROPERTY OWNER IN LID #8663. FOR INSTANCE, EACH PROPERTY OWNER SHOULD BE ALLOWED TO ADVOCATE TO THE CITY OF TACOMA AND TO THE PROPERTY OWNERS IN LID #8663 THAT THESE CHANGES ARE NOT REASONABLE.

IN OUR INSTANCE WE WOULD ARGUE WHEN A PROJECT IS DONE THAT WE RECEIVED NO BENEFIT FROM LID #8663 AND SHOULD NOT BE CHARGED ANY MONEY FOR WHAT THE CITY CALLS IMPROVEMENTS TO OUR PROPERTY. THIS WOULD BE A NET LOSS TO THE LID #8663 PROJECT. THE DAMAGES WOULD WELL EXCEED THE \$30,000 ESTIMATE OF OUR PROPORTIONATE SHARE OF THE LID COSTS.

THERE IS NO REASON THAT A NEW LID PROCESS SHOULD BE STARTED ON THE BASIS OF THE INFORMATION BELOW.

THE CHANGES THAT HAVE BEEN MADE:

LID #8663 was started with drawings shown to owners of abutting properties, when enough owners signed an interest in the LID it received a City of Tacoma Council Resolution to proceed to a hearing, the Hearing Examiner made his decision, and the City of Tacoma Council Adopted a City Ordinance to allow the LID #8663 to proceed based upon the 2019 Drawing.

1. In January 2023, the City of Tacoma LID Department made significant changes to the approved design in the 2019 drawing. The original standard Hammerhead at the dead end of 48th and Mullen required by City of Tacoma Design Manual 6.10 that states when the dead end serves 3-4 lots the Standard Hammerhead is required, CTDM Figure 4-12. This is what was presented to property owners as the drawings of 2019 included through process. Sometime before 2023 LID #8663 was redesigned and the Standard Hammerhead required by the City of Tacoma at the end of Mullen Street was replaced with a Branch Turnaround

Hammerhead, first with a Branch Turnaround Hammerhead located on the east side of N. Mullen. Then a second Branch Turnaround Hammerhead was created in front of 4808 N Mullen which does not comply with the Branch Hammerhead Standards. The new Branch Turnaround Hammerhead does not even meet the standard requirements of the City of Tacoma Design Manual 6.10 Figure 4-11. It also removes the required sidewalk in Design Manual Table 4-6 Exhibit KK 7/11 Exhibit D. The oral justification made by Ralph Rodriguez to me was because there could be no residential access to a Hammerhead based upon an oral policy from an unknown person with unknown qualifications. That is incorrect. Limited vehicle access from a residence to a Hammerhead is not restricted by the City of Tacoma Design Manual 6.10. The access limitation does not exist in the built environment of Hammerheads in Tacoma. How does an oral policy defeat the adopted City of Tacoma Design Manual?

2. What residences existing and future is Ralph Rodriguez talking about that would be required to access onto Mullen Street from the Standard Hammerhead designed in designed at the end of Mullen Street in 2019? The 2019 LID # 8663 plan does not include a driveway approach in front of 4812 N. Mullen, where none should exist. I have attached parts of the Building Permit as Exhibit # **KK 7/11 Exhibit A**. for 4812 N. Mullen dated 8-6-2003. The permit and application show the vehicle access to the house was parking in a basements garage and on the 25 foot rear yard setback. The old house was trailered away. The 4812 residence was built. Permits require that all right of way work are separate from the Combination Permit for the 4812 N. Mullen. The residential house permit which included the basement garage and parking off the alley. A temporary Permit was issued on 3-15-2004 until 4-15-2004 for the construction of a temporary asphalt driveway. There was never a permit issued for a permanent driveway approach and the gated single car parking area in the front yard of 4812 N. Mullen. The only driveway approach on the 2019 LID #8663 is in front of our property 4808 N. Mullen. It is grandfathered in as the house was built in 1905. LID #8663 eliminates that access to 4808 N. Mullen.

On the east side approximately 15 feet beyond the end of the 2019 Hammerhead drop off at a 75-80 degree slope which is most likely permanently **not** buildable. There are no houses on these steep slopes from South 7th and Stadium Way to S. 19th at the University Place border.

These should not be an issue in any instance because there is no prohibition in the City of Tacoma Design Manual that limits access to a residence to a Hammerhead.

3. The City of Tacoma Design Manual 6.10 also requires compliance with the International Fire Code. The 2018 International Fire Code (this is the latest version adopted by the City of Tacoma) Section 503.2.5 p.74 "Dead-end fire apparatus access roads in excess of 150 feet shall be provided with an **approved** area for turning around fire apparatus." I see no approval of this new

Branch Turnaround by the Tacoma Fire Department. Attached as exhibit #2 in the IFC code section.

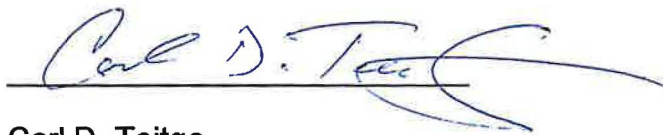
I recently walked into the 41st and Gove Tacoma Fire Station two times (this is only 8 blocks away from 4808 N. Mullen) I was told that they would have no trouble accessing N. 48th and Mullen St. as it exists for fires. They also said no one consults them about road changes. They suggested that I contract DFM Vern Porter City of Tacoma Fire Department.

My son, Scott, and I met with Tacoma DMF Vern Porter and an associate at 48th and N. Mullen Street on Thursday July 7th, 2023. I showed them the original Traditional Hammerhead and the newer Branch Hammerhead in front of 4808 N. Mullen which was painted out to scale and parked cars where they are allowed to park. DFM Vern Porter stated that no one from the City of Tacoma has talked to him about this LID or asked for approval of this Branch Turnaround Hammerhead. He stated it is clearly inadequate for the Fire Department to use as a turnaround.

The design of the Branch Hammerhead in front of our 4808 property does not even meet the requirements of CTDM 6.10 Figure 4-12 which show the branch as twenty-six feet deep and ingress and egress as 24 feet wide a total of **50 feet** to turn around. The original Standard Hammerhead was **70 feet**. The current LID #8663 has a currently designed LID #8663 Branch Hammerhead Turnaround that is only 13 feet deep (not 26 feet deep) to the curb and a 28-foot road that allows parking of about 8 feet on the east side of the road for the LID # 8663 turnaround length of about **33 feet. The change in dimensions shows the inadequacy.**

4. The original LID# 8663 had a paving Section of 32 feet the current LID #8663 has a paving section of 28 feet.
5. The original LID # 8663 allowed at least 12 parking spaces on the west side of N. 48th and Mullen Street. The LID # 8663 allows bump in parking that loses 1.5 parking spaces. The radiuses and width of the Branch Turnaround Hammerhead of 65 feet takes at least 3.5 parking spaces. There would be a loss of 5 parking spaces on the west side on N. 48th and Mullen based upon the new design. This is a stunning viewing area that many people visit for the unobstructed views and park. The large houses and ADU that can be constructed on three lots will require significant parking besides in the alley.
6. The newest design on the Branch Hammerhead removes a large section of sidewalk. Which is required by CTDM Table 4-6 Designs Requirements for developments. The requirement is for sidewalks along all lot frontages. This is not provided in the new designs.
7. The soils reports described in the 4812 N Mullen in Exhibit KK 7/11 Ex A and the soil report for 2808 N. Mullen should be presented to determine the correct time

of the year for the soils present at the end of N. Mullen which have extensive fines and are subject to absorbing water and unable to be compacted when wet. I have also done soils reports for 2808 N. Mullen should also be presented to determine the correct time of the year to allow the LID to be constructed. This is not a fall/winter project unless the budget goes much higher and leaves the current residents with potentially difficult access to their homes.

A handwritten signature in blue ink, reading "Carl D. Teitge", is written over a horizontal line. The signature is stylized with a large, sweeping flourish at the end.

Carl D. Teitge

July 11, 2023

KK 7/11 EX A



CITY OF TACOMA
Department of Public Works
 Division of Building and Land Use Services

747 Market Street
 Tacoma, WA 98402
 (253) 591-5004

COMBINATION PERMIT

Visit www.govME.com to schedule an inspection or check the status of a permit
 24 Hour Inspection Line - Call (253) 573-BLUS

CASE NO: **CMB2003-00160**

ISSUED: 08/06/2003

EXPIRES: 02/06/2004

PROJECT:

SITE ADDRESS: **4812 N MULLEN ST**

PARCEL NO: **9470000072**

SUBDIVISION: **WEST TACOMA**

LOT AND BLOCK: **L B**

FULL LEGAL DESCRIPTION ON FILE

PROJECT DESCRIPTION

Construct 1 story w/basement, attached garage & 1 gas fireplace

OWNER

HOWARD J DALE & GAIL A
 C/O RAINIER ASSOCIATES
 5909 ORCHARD ST W
 TACOMA WA 98467

CONTRACTOR

BELLTAG ENTERPRISES
 36129 WEST CLEAR LAKE RD
 EATONVILLE WA 98328
 PH1 (360)832-3081
 Lic No: BELLTE*18101
 Exp Date: 8/8/2003

Zoning: VS	No of Floors: 1	AREA	Det Garage/Carport:	Bedrooms: 3
City Contact: LDAWSON	Total Floor Area: 2,668		Storage:	Basements: 1
No of Units: 1	Basement: 868		Other Acc Bldg:	Other: 4
Est Value: \$330,670.00	Att Garage: 564		Miscellaneous:	Baths: 3
ype of Work: NEW	Deck:		Tot Access Bldg Area:	Fireplaces:
Constr Type: V N	Other: 28			Chimneys:
Occ Grp: R-3	Tot Main Bldg Area: 3,536			Flues:
Use Code: SFD			Storm Water SWPPP:	

Wtr Closets: 3	Fir Drains:	Heat Pumps:	Bldg Type: SF
Basins/Lavs: 4	Wash Mach: 1	Furnaces: 1	Bldg Desc: 1 STORY
Bathtubs: 2	Press Red: 1	Htg Blrs:	Srv Size: 200
Showers: 1	Sumps:	Whl Hse Vnts:	Srv Type: OH
Sinks: 1	Othr Type 1: BIDET : 1	Fireplaces: 1	Heat Type: FR
Ldry Trays: 1	Othr Type 2: :	Gas Piping:	Heat KW:
Dishwashers: 1		Other Appl:	Heat Pump:
Wtr Htrs: 1	Wtr Htr Eff: Fuel Type:	Duct Wrk Only:	

CONDITIONS OF APPROVAL

- All Fireplaces Shall be Labeled per State Building Code Amendments 1/1/9;
- Sidewalks required

PERMIT MUST BE KEPT ON SITE DURING CONSTRUCTION.

All plumbing, heating and electrical work will be performed by either the homeowner or by a contractor licensed to do same.
 Separate permits are required for other work, including but not limited to, sanitary and storm sewer, sidewalk, curb and gutter, driveways, parking lot, street improvements, plumbing, mechanical, fire protection and signs.

X

Laurel R. Saville
 Signature of Owner/Contractor

THIS PERMIT
 ABOVE II

FEES

Type	Amount
Building Permit Fee	\$2,837.10
Plumbing Permit Fee	\$195.00
Mechanical Permit Fees	\$171.35
Electrical Permit Fee	\$66.00
Water line installation inspec	\$60.00
Strong Motion Instr. Fund	\$283.71
Endangered Species Fund 7%	\$218.20
State Building permit Fee	\$4.50
Plan review Fee	\$220.00
TOTAL	\$4,055.86

BUILDING PERMIT PAGES

CITY OF TACOMA
PUBLIC WORKS DEPARTMENT
BUILDING AND LAND USE SERVICES

PLAN CORRECTION SHEET

SINGLE FAMILY DWELLING

Bell Tray Industries
NAME

4812 N. Mailen
ADDRESS
R2VS
ZONE

1. Permit card to be posted at job site for all inspections. Inspections must be called for at least the day prior to the desired inspection. Telephone 591-5004.
2. An approved set of plans is required on the job site when calling for inspections per Section 106.4.2 of the Uniform Building Code.
3. **SEPARATE PERMITS** are required for sewer connections, sidewalks, and driveways.
4. Property corners must be clearly marked prior to a footing inspection. Survey stakes and string lines may be required.
5. The finished driveway grade shall not exceed 15% unless a design is approved by the City Engineer.
6. All reinforcing steel in the foundation shall be tied in place before form inspection per Section 1907.5.1
7. Provide steel reinforcing in chimney per Section 3102.4.3 of the Uniform Building Code. Inspections are required.
8. All flashing must be a minimum of 26 gauge per Section 1509 of the Uniform Building Code.
9. All plumbing systems meeting requirements of Section 409 of the Uniform Plumbing Code shall provide back water valve protection.
10. All downspouts must be connected to a drain line leading to an approved drainage system.
11. Provide approved smoke detectors per Section 310.9.1 of the Uniform Building Code.

5/30/96

(continued on back)

12. Vent attic per Section 1505.3 of the Uniform Building Code. The net free ventilating area shall be not less than 1/150 of the area of the space ventilated, except that the area may be 1/300 provided at least 50% of the required ventilation area is provided by ventilators located in the upper portion of the space to be ventilated at least three feet above eave or cornice vents with the balance of the required ventilation provided by eave or cornice vents.
13. Mechanical ventilation systems must be vented directly to the exterior of the building and be provided with back draft dampers.
14. Provide site drainage and slope grading per Uniform Building Code Appendix Chapter 33, Section 3315. **FINAL GRADING AND EROSION CONTROL MUST BE COMPLETED PRIOR TO FINAL INSPECTION.**
15. Provide for sidewalks on all street frontages per City standards. **SEPARATE PERMIT REQUIRED.** All required sidewalks and other off-site improvements, required by the City of Tacoma Amendments to the 1994 Uniform Building Code Section 111, must be completed before final occupancy. Ordinance 25825.
16. Address numbers must be installed before final inspection.
17. **FINAL INSPECTION IS REQUIRED PRIOR TO OCCUPANCY OF BUILDING.**
18. The permit holder is responsible for erosion control measures necessary to prevent mud and silt from entering neighboring properties, City Right-of-Way, and the City's storm drainage system. At the discretion of the Building Official the use of silt fences, hay bales, rock check dams, settling basins and / or trenching may be required. Also, a graveled construction entrance may be required.

ADDITIONAL CORRECTION NOTES -

CERTIFIED SURVEY REQUIRED AT FRAME.
COED REPORT REQUIRED PRIOR TO POURING
FOOTINGS

**CORRECTIONS AS ABOVE INDICATED
WILL BE COMPLIED WITH**

(Sign here)

Louise R. Antaglia
Signature of Owner or Applicant

DATE

8/6/03

CHECKED BY

NW

SURFACE MOH
BRASS CAP W/PUNCH
DOWN 0.5"
1/02/98

589°46'27"N	650.00' (PLAT)
	665.20' (MEAS)
330.00' (PLAT)	
392.60' (CALC)	

CAL
DATE

FERDINAND STREET

440.00' (PLAT)
N00°38'15"W 443.37' (NEAS)

RIGHT-OF-WAY

FND REBAR & CAP
/LS 19535 (ACCEPTED)

189° 3' 11" E

51.5'

03

EXISTING HOUSE

ROCKERY -

NB9.59.45"W	330.00'	(PLAT)
	330.95'	(MEAS)

NORTH 48TH STREET

SURFACE MON
BRASS CAP W/PUNCH
DOWN 0.5"
1/02/98

GRAPHIC SCALE 1"=20'



20 40 60



**SADLER—
BARNARD
& ASSOC. INC.**
LAND SURVEYS*

RECORD OF SURVEY
FOR: DALE HOWARD
4105 NORTH MASON STREET
TACOMA, WA 98407

DRAWN: ETB	SCALE: 1"=20'
------------	---------------

DATE: 11-20-01	JOB No: 2001-15
----------------	-----------------

Surveyed by: **SADLER/BARNARD & ASSOC**
12714 VALLEY AVENUE E
SUMNER, WA 98390



7-21-03

RIIPINEN SURVEYING INC

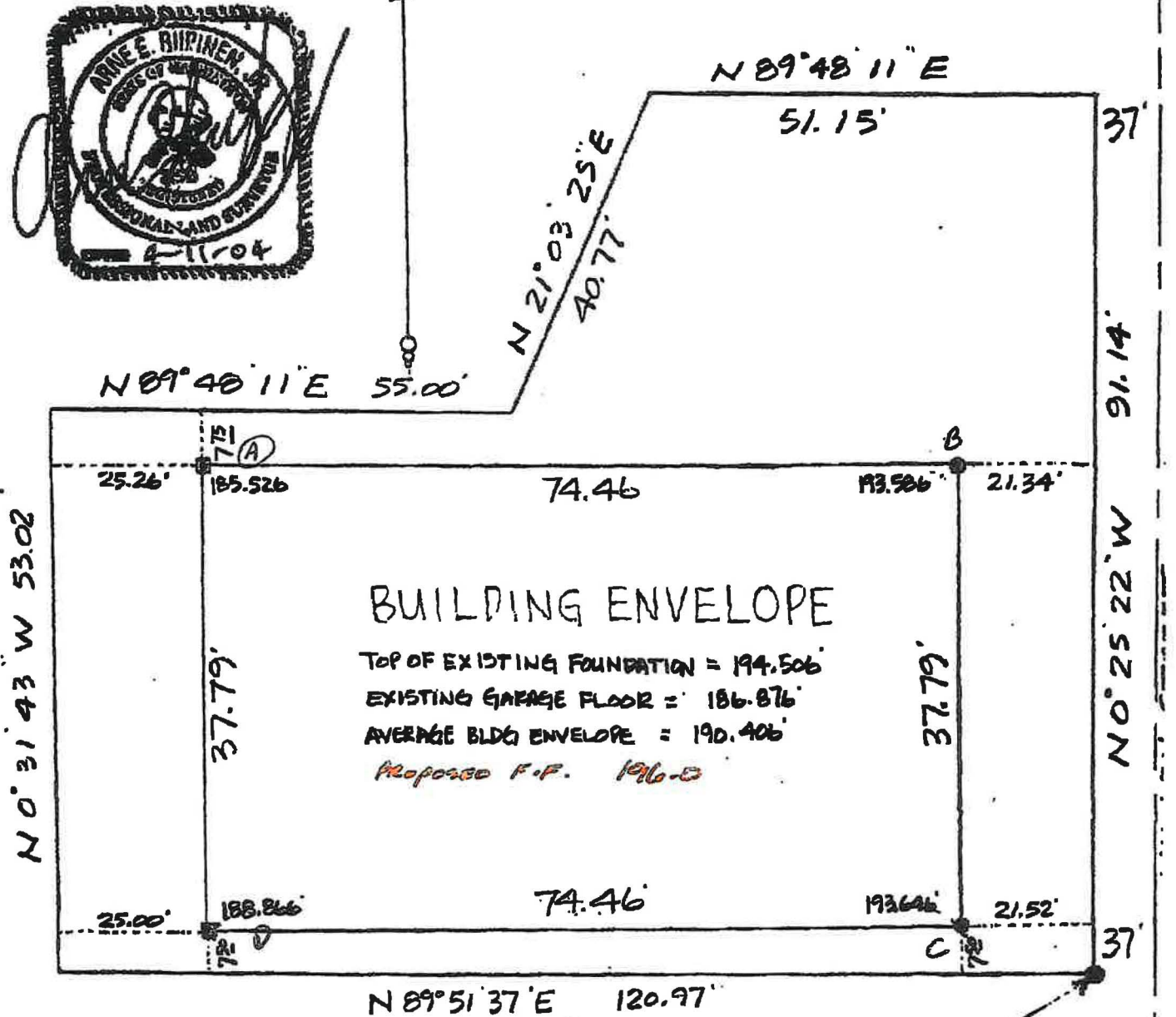
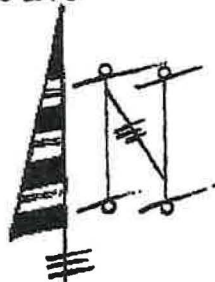
Arne Riipinen Jr.
8508 50th Ave. E.
Puyallup, WA. 98371
Phone (253) 845-0048
Fax (253) 845-4856



● = 1/2" REBAR & CAP LS 19635

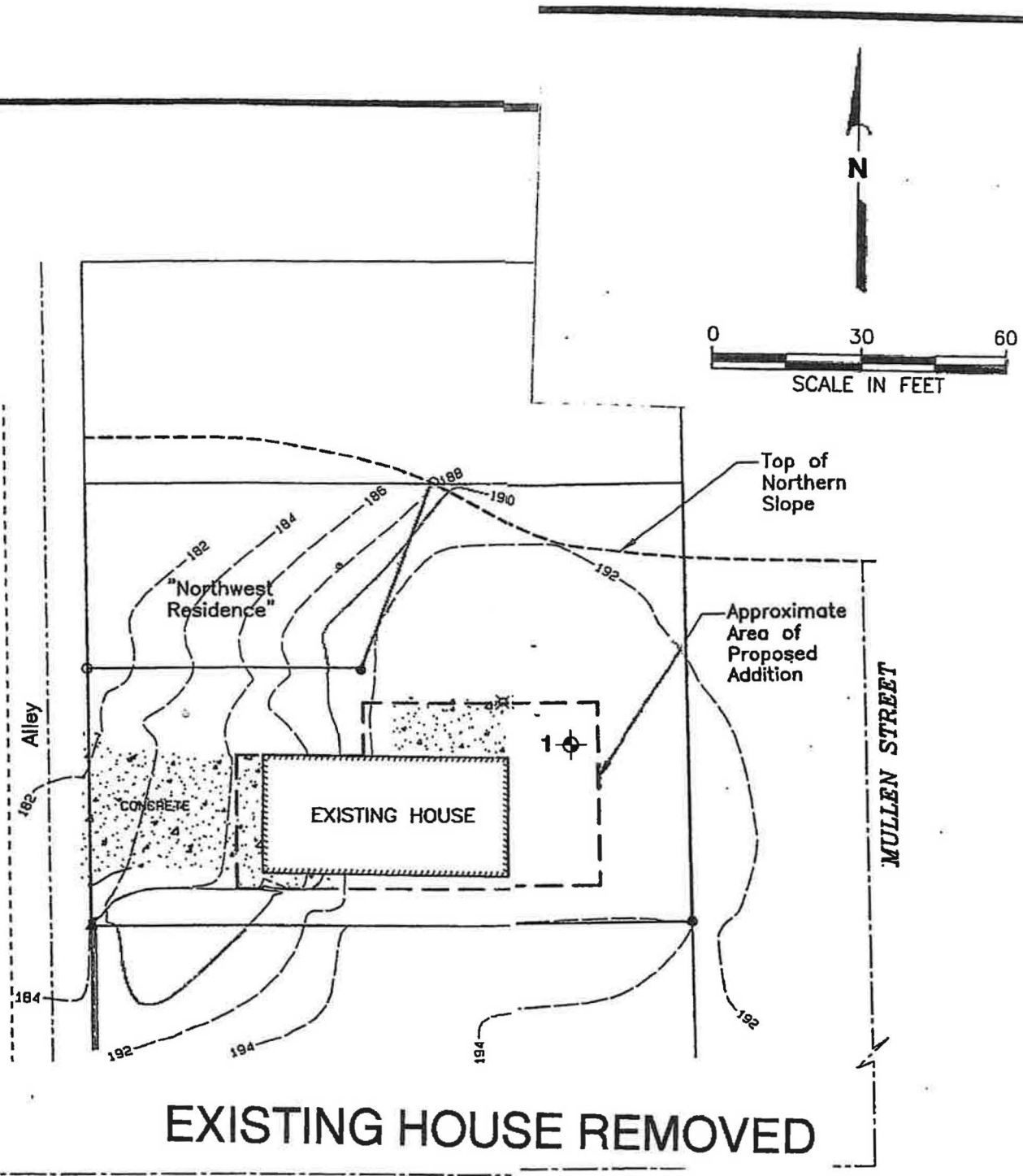
■ = HUB & TACK SET

■ = MPQ NAIL SET



TBM = TOP OF REBAR & CAP
ELEV. = 193.356 CITY DATUM

2-71-02



SITE PLAN

FIGURE 3-00151

67

66

own are approximate.

urposes. It is intended to assist in showing
d document.

03-00151

"200115SR.DWG", provided by Sadler Barnard and Associa

tes.

Geo  Engineers

March 12, 2002

EXISTING HOUSE WAS REMOVED BY RELOCATION

Dale Howard
4105 North Mason
Tacoma, Washington 98407-4933

Attention: Dale Howard

Report
Geotechnical Engineering Services
Single-Family Residence
Tacoma, Washington
File No. 9748-001-00

INTRODUCTION

This report presents the results of our geotechnical engineering services for the property located at 4812 Mullen Street in Tacoma, Washington. This report is based on our discussions with you, a preliminary set of building plans and our exploratory work on the property and in the nearby vicinity.

A single-family residence with a partial daylight basement/garage currently exists in the southern portion of the property. The northern portion of the property consists of a small yard and a steep slope. We understand that proposed improvements will include adding on approximately 1,000 to 1,500 square feet of living space to the existing house. Portions of the basement/garage area may also be reconstructed. The proposed location of the new home will be approximately 30 feet from the top of the northern steep slope area. Because of slope conditions, the City of Tacoma requires that a geotechnical report be prepared which addresses the landslide and erosion hazards associated with the site.

PURPOSE AND SCOPE

The purpose of our geotechnical services is to explore shallow subsurface soil and ground water conditions at the site to use as a basis for developing geotechnical-engineering recommendations that meets with the City of Tacoma requirements. Our specific scope of services for this project includes the following:

1. Exploring shallow soil and ground water conditions by drilling one exploratory boring in the northeastern portion of the property. One boring was drilled and sampled to a depth of 34 feet on February 14, 2002. Drilling services were subcontracted to GeoEngineers, Inc.
2. Obtaining representative samples at intervals of about 5 feet during drilling using split spoon sampling methods.

3. Evaluating the stability of the northern slope on the site based on our subsurface explorations.
4. Designating landslide, seismic and erosion hazards on the site, as appropriate, per City of Tacoma regulations.
5. Developing recommendations for setbacks from steep slope areas, based on the subsurface conditions and our analysis.
6. Providing seismic design criteria based on the results of our subsurface explorations in conjunction with the 1997 Uniform Building Code (UBC).
7. Providing general recommendations for site preparation and grading, including fill placement criteria, suitability of on-site soils for use as fill, and subgrade preparation.
8. Providing general recommendations for subgrade preparation and foundation design for the home addition. This will include minimum size and embedment, allowable bearing capacity, lateral resistance values and estimates of settlement.
9. Providing recommendations for subgrade preparation of concrete slabs on grade. In addition, we will include recommendations regarding the use of capillary break layers and vapor barriers.
10. Providing general recommendations for site drainage and control of any ground water, which may be encountered.
11. Preparing this written report containing our observations, conclusions and recommendations along with the supporting data.

SITE CONDITIONS

SURFACE CONDITIONS

The property is located above a steep slope area in northwest Tacoma, Washington as shown on the Vicinity Map, Figure 1. Surrounding properties primarily consist of single-family residences. Mullen Street is located east of the property and dead-ends near the top of the slope. Waterview Street is located at the toe of the slope. An alley is located west of the property, a single-family residence is located just below and northwest of the property. These properties are generally separated by a near vertical cut that has recently been excavated. We understand that a retaining wall is currently in the design process and will be built to retain this cut area between the properties.

The southern portion of the property for this study is primarily occupied by the existing home. The existing home consists of two stories to the west, including the daylight basement/garage, and one story on the east side. The eastern portion of the home is near the same grade as Mullen Street. Access to the basement/garage is off the alley in the west. The northern portion of the property consists of a small grass yard surrounded by shrubbery. Beyond the yard is the steep slope area.

ACCESS TO BASEMENT/GARAGE OF ALLEY

trees and blackberry bushes. Evergreens were observed to be scattered throughout. We did not

observe any evidence of deep-seated slope instability or erosion along the slope during our time on site. The ground near the toe of the slope was observed to be in a wet condition indicating that seepage may exist along the slope face.

It should be noted that we did observe that the slope located north of the northwest residence has undergone sloughing and landsliding. This slope is a continuation of the slope located north of the property for this study. This landsliding is a result of loose fill that was placed out onto the top of the slope and becoming saturated.

SUBSURFACE EXPLORATIONS

Subsurface conditions at the project area were explored by drilling one exploratory boring to a depth of 34 feet on February 14, 2002 at the approximate location shown on the Site Plan, Figure 2. The location of the boring was determined in the field by hand taping from relevant site features. The elevation of the boring is based on the topographic survey provided. The location and elevation of the boring should be considered approximate.

The drilling and sampling were completed in a manner similar to the ASTM D1586 test method, which is for the Standard Penetration Test (SPT) method of sampling, with the exceptions noted as follows. Samples of the soils were obtained from the boring using a 2.4-inch I.D., heavy-duty, split-barrel sampler. The sampler was driven into undisturbed soil with a hammer weighing 300 pounds and falling a vertical distance of about 30 inches. The number of blows required to drive the sampler the final 12 inches or other specified distance is indicated adjacent to the corresponding sample notations on the boring log.

Our field representative classified the soils sampled, maintained detailed logs of the soil units encountered, assisted the subcontractors in obtaining samples of the soils encountered and observed ground water conditions. Soils were classified visually in general accordance with the system described in Figure 3, which is based on ASTM standards D2487 and D2488. A key to the boring log is presented as Figure 4. A summary of the boring log is presented as Figure 5.

GEOLOGIC SETTING

The Washington Department of Ecology Coastal Zone Atlas indicates that this property is underlain by three general geological units. The level portion of the property, where the existing home is located is labeled as Vashon Till (Qvt). The steep slope portion of the property, north of the existing house is labeled as esperance sand (Qve). The toe of the slope, just above Waterview Street is labeled as non-glacial sediments, undifferentiated (Qns). The Vashon Till and esperance sand was deposited directly beneath the glacial ice during the most recent glaciation, the Vashon stade of the Fraser glaciation about 10,000 to 15,000 years ago.

The Washington Department of Ecology Coastal Zone Atlas classifies the upper and level portion of the property as being Class S (stable). The sloped portion of the property is classified as Class U (unstable).

SUBSURFACE CONDITIONS

During our subsurface explorations, we encountered fill overlying sand. The fill was observed to consist of silty sand with occasional gravel in a loose and moist condition. The fill was observed to extend to a depth of about 7½ feet below surrounding site grades. We expect that this fill was likely placed during site development of the existing house and the nearby homes.

Underlying the fill, we encountered sand with silt and occasional gravel in a dense condition to an approximate depth of 21 feet. Fine to medium sand in a very dense condition was encountered from an approximate depth of 21 feet to the full depth explored.

Ground water was not encountered in our explorations, however soils were observed to generally be in wet condition near a depth of 16 feet. During wet weather, it is common for ground water to perch on impermeable soils and migrate through more permeable material. Ground water seepage may be encountered in discontinuous areas during site development, such as near the fill and native soil contact. Ground water levels should be expected to vary as a result of seasons, precipitation and other factors.

CONCLUSIONS AND RECOMMENDATIONS

GENERAL

Based on the results of our subsurface explorations and our site reconnaissance, we conclude that the site is suitable for the proposed development provided our recommendations are followed. Proposed structures may be satisfactorily supported on shallow spread footings founded on the dense native soils or on structural fill extending to these soils or on the existing fill provided that the upper two feet is proof compacted as recommended further in this report.

The northern steep slope on the site meets the technical criteria for landslide hazard areas per Tacoma Municipal Code Chapter 13.11. Based on our reconnaissance, subsurface explorations and analysis, we conclude that development on this property will not adversely effect the northern slope conditions provided that our recommendations are regarding earthwork, building set backs, and erosion control are followed.

The existing fill and some of the near surface sands encountered on the site contain a significant percentage of fines (material passing the U.S. No. 200 sieve). The fines cause the soils to be very sensitive to small changes in the moisture content. These soils will soften and become disturbed if exposed to construction traffic during wet weather conditions. Once disturbed, these soils will be difficult, if not impossible, to work and compact. To reduce grading and construction costs, we recommend that the earthwork phase of the project be undertaken during dry weather.

Our specific evaluations and recommendations are discussed in the following sections.

ROAD BUILDING IN WET WEATHER N MULLEN??

WHY IS LID PROVIDING ACCESS

Dale Howard
March 12, 2002
Page 5

TO EAST 48 MULLEN TO HAZARDOUS SLOPED LOTS

CRITICAL AREAS EVALUATION

Landslide Hazard Areas

The northern steep slope area on the property is estimated to have a declination of approximately 80 percent and seepage was observed near the based of the slope. The City of Tacoma Municipal Code Chapter 13.11 defines a steep slope as one that is greater than or equal to 40 percent. The Washington Department of Ecology Coastal Zone Atlas classifies the sloped portion of the property as Class U (Unstable). Based on these criteria, we conclude that the northern sloped portion of the property meets the technical criteria for a landslide hazard per Tacoma Municipal Code Chapter 13.11.

Erosion Hazard Areas

The City of Tacoma Municipal Code Chapter 13.11 defines an erosion hazard area as being mapped as susceptible to erosion by the SCS, USGS (United States Geological Survey) or by the Washington Department of Ecology Coastal Zone Atlas. The classifications that designate an erosion hazard area include Class U (Unstable), Class Uos (Unstable old slides) Class Urs (Unstable recent slides) and Class I (Intermediate). As previously indicated, the Washington Department of Ecology Coastal Zone Atlas categorized the slope area as Class U (Unstable). Based on this we conclude that the sloped portion of the property meets the technical criteria for an erosion hazard per Tacoma Municipal Code Chapter 13.11.

Erosion control measures should be implemented to limit the additional influx of water to the slope from the residence and surrounding impervious surfaces, as discussed further in this report.

Seismic Hazard

The City of Tacoma Municipal Code Chapter 13.11 indicates that seismic hazard areas shall include "areas subject to severe risk of earthquake damage as a result of seismic induced settlement, shaking, slope failure or soil liquefaction. These conditions occur in area underlain by soils of low cohesion or density usually in association with a shallow ground water table". Seismic hazard areas are also defined by the code as areas categorized as Class U (Unstable) according to the Department of Ecology Coastal Zone Atlas. Based on the mapping category of the project area by the Department of Ecology Coastal Zone Atlas, we conclude that the sloped portion of the property meets the technical criteria for a seismic hazard area. We have provided discussions regarding our opinion of seismic hazards for this project and they are presented further in this report.

SLOPE STABILITY

General

No evidence of deep-seated instability, erosion, raveling or surficial sloughing was observed during our site visit. Dense sand is not typically susceptible to deep-seated slope failures. Based on our subsurface explorations and analysis, we conclude that the steep slope located on the site

is stable relative to deep-seated failure in its current condition. It is also our opinion that the proposed development as we understand will not adversely affect slope stability provided that the appropriate drainage control and setback recommendations are followed.

Proper drainage is imperative for long-term slope stability. The influx and infiltration of water is a major factor in the destabilization of slopes. Also, any erosion that occurs can lead to shallow instability. At no time should surface water be directed to discharge or pond on the slope. In addition, surface loads such as stockpiled supplies, equipment, and soil should not be placed above the northern slope area.

Weathering, erosion and the resulting surficial sloughing and landsliding are natural processes that affect steep slope areas. Significant weathering typically occurs in the upper 2 to 4 feet and is the result of oxidation, root penetration, wet/dry cycles and freeze/thaw cycles. Once disturbed, these soils have a lower strength and are susceptible to increased saturation from ground and surface water and are susceptible to raveling and erosion, especially on unprotected slopes. These processes can be reduced by proper construction and erosion control techniques.

Building Setback and Buffer

As previously stated, it is our opinion that the slope is stable under existing conditions. We recommend a minimum setback (including buffer) of 25 feet be maintained from the top of the northern steep slope area. The 25-foot setback/buffer area may be landscaped and/or grassed. Impervious surfaces constructed within the setback and buffer area (i.e., decks) should be constructed such that water from the surface is controlled and collected. At no time should surface water be directed to discharge or pond on the northern slope area. We recommend that irrigation in the area be shut-off during the wet season. If decks, patios, or other types of similar structures are constructed within the setback/buffer area, we recommend that they be constructed independently from the house or be constructed with a break away connection.

Erosion Control

Temporary erosion control should be provided during construction activities and until permanent erosion control measures are functional. Surface water runoff should be properly contained and channeled using drainage ditches, berms, swales, and tightlines. Disturbed areas should be protected with a temporary covering until new vegetation can take effect. Jute or coconut fiber matting, excelsior matting or clear plastic sheeting is suitable for this purpose.

Permanent measures for erosion control include reseeding or replanting the disturbed areas as soon as possible and protecting those areas until new vegetation has been established. The removal of natural vegetation should be limited to active construction areas. Vegetation presently existing on the northern slope should not be disturbed and be left intact.

Permanent site grading should be accomplished in such a manner that storm water runoff is not concentrated and surface water is not directed to steeply sloped areas. This can be accomplished by grading the lot to direct the flow to appropriate collection points away from the

slopes. Tightlines should be used where necessary to direct storm or other surface water across sloped areas. Tightlines should be anchored on slopes greater than 15 percent.

SITE PREPARATION, GRADING, AND EARTHWORK

City of Tacoma Performance Standards

The City of Tacoma Municipal Code Chapter 13.11 requires that location and design of development on moderate and steep slopes shall meet the following standards:

1. Development must be located to minimize soil disturbance and removal of vegetation, to protect sensitive areas and to retain open space.
2. Structures must be clustered where possible to reduce soil disturbance and maintain the natural topography.
3. Structures should conform to the natural contour of the slope and foundations should be tiered, where possible to conform to the existing topography of the site.
4. All development proposals shall be designed to minimize the footprint of building and other disturbed areas. Common access drives and utility corridors are encouraged.
5. All development shall be designed to minimize impervious lot coverage and should incorporate understructure parking and multi-level structures within the existing height limit.
6. Roads, walkways and parking areas should be designed to parallel the natural contours.
7. Access shall be in the least sensitive area of the site.

Subgrade Preparation

Based on our understanding of site improvements, fill placement for the new addition will likely be minor. We anticipate that foundations will be placed in cut areas just below existing grades; a partial basement/garage portion is also being considered. If foundation elements or other structural elements are to be founded upon the existing fill, as encountered in our explorations, the upper two feet of this material should be proof compacted to a uniformly firm and unyielding condition prior to placement of structural elements.

Subgrades should be clear of all surface deleterious and organic matter and loose soil. Soils unsuitable for use as fill should be removed from the site or stockpiled for use in nonstructural applications (e.g., landscape areas). Loose fill and/or debris should not be cast onto or above the steep slope area. Any soft, loose or otherwise unsuitable subgrades exposed during subgrade preparation should be recompacted, if practical, or removed and replaced with properly compacted structural fill. Disturbance of subgrades to a greater depth should be expected if site preparation is accomplished during periods of wet weather when the surficial soil is over its optimum moisture content.

We recommend that a member of our staff evaluate the condition of the exposed subgrade after compaction and prior to placement of structural elements or fill. Any soft, loose or otherwise unsuitable areas which are delineated during the evaluation should be recompacted, if

practical, or the material should be removed and replaced with properly compacted structural fill based on the recommendations of our site representative.

Fill Quality

Material used for fill should be free of debris, organic contaminants, and rock fragments larger than 6 inches. The workability of material for use as structural fill will depend on the gradation and moisture content of the soil. As the amount of fines increases, soil becomes increasingly more sensitive to small changes in moisture content and adequate compaction becomes more difficult or impossible to achieve. If construction is performed during wet weather conditions, we recommend using fill consisting of well-graded sand and gravel containing less than 5 percent fines by weight based on the minus 3/4-inch fraction. If prolonged dry weather prevails during the earthwork phase of construction, a somewhat higher fines content may be acceptable.

Quality of On-Site Materials as Fill

During dry weather construction, any nonorganic on-site soil may be considered for use as fill, provided it meets the criteria described above and can be compacted as recommended. If the material is over optimum moisture content it will be necessary to aerate or dry the soil prior to placement and compaction.

The soils generally encountered on the site contain significant amounts of silt and will be moisture sensitive. These materials may not be suitable for use as fill under wet weather conditions. Compaction of these soils will be difficult, if not impossible, to achieve during wet weather conditions. Even when properly compacted, this material can be easily disturbed and will soften when exposed to moisture. We recommend that completed areas be restricted from traffic or protected prior to wet weather conditions.

Compaction

All fill should be uniformly compacted in horizontal lifts to at least 95 percent of the maximum dry density (MDD) determined in accordance with ASTM D-1557 (modified Proctor).

The lift thickness used during placement and compaction will depend on the moisture and gradation characteristics of the soil and the type of equipment being used. If necessary, the material should be moisture conditioned to near-optimum moisture content prior to compaction. Compaction must be achieved by mechanical means. Jetting, ponding, or flooding cannot be used for compaction. During fill and backfill placement, sufficient testing of in-place density should be conducted to verify that adequate compaction is being achieved.

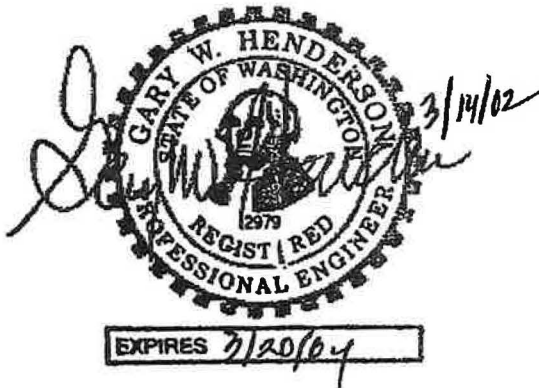
If underground utilities are to be installed, we recommend that the initial lift of fill over the pipe be thick enough to reduce the potential for damage during compaction but generally should not be greater than about 18 inches. In addition, rock fragments greater than about 1 inch in maximum

Dale Howard
March 12, 2002
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We trust this provides the information you require at this time. We appreciate the opportunity to be of service to you on this project. Please contact us should you have any questions concerning our findings or recommendations, or should you require additional information.

Respectfully Submitted,

GeoEngineers, Inc.



Dennis J. Thompson, P.E.
Geotechnical Engineer

Gary W. Henderson, P.E.
Principal

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Attachments

KK 7/11 EX B

INTRODUCTION

The City of Tacoma Right-of-Way Design Manual (Manual) shall apply to the construction of all street and right-of-way (ROW) improvements including stormwater and wastewater construction, street lighting, traffic signalization, landscaping, Americans with Disabilities Act (ADA) requirements, and channelization. The Manual provides the minimum technical standards required to construct improvements within the City of Tacoma ROW. This Manual is designed to be used in conjunction with other local, state, and federal rules, regulations, and design guidance as applicable to a given project. See References for a list of the most commonly referenced additional documents that will be necessary for design within the ROW.

Tacoma Municipal Code (TMC) Chapter 10.22 provides the authority to require the use of this Manual for certain projects.

The City of Tacoma (City) has developed this Manual to outline design criteria for City-owned streets and utilities as well as private accessways. The minimum technical standards described in this Manual help ensure public infrastructure is safe, effective, efficient, economical, and sustainable. City staff, private developers, and any other entity proposing construction within the public ROW or proposing construction of City-owned facilities shall use this Manual. Deviations from the standards within this Manual shall be based upon sound engineering practices and shall be reviewed and approved by appropriate City staff before implementation.

This Manual should be used by the design engineer as a tool prior to submitting plans for review. It should be considered a "living document" and is subject to updates and revisions. The Manual and any updates are available at www.cityoftacoma.org/designmanual.

The City became the first "Greenroads® Community" in June 2014, through adoption of Resolution No. 38945. This means that the City is committed to developing a policy for the City's roads and other transportation infrastructure in order to be models of environmental, economic, and social stewardship and by setting community goals of sustainable design, construction, and maintenance. See CHAPTER 4 for additional information concerning Greenroads® requirements.

SECTION 1 Plans, References, and Specifications

1.1 References

References and portions of text from documents, ordinances, standards, and codes have been provided for convenience based on the current publication date of each reference. All references contained herein shall be superseded by the latest adopted or published respective reference.

1.2 Standard Specifications

Projects shall use the most recent City adopted version of the Washington State Department of Transportation (WSDOT Standard Specifications) for Road, Bridge, and Municipal Construction (Standard Specifications) as supplemented or amended by the Washington State Chapter of the American Public Works Association (APWA); the City of Tacoma General Special Provisions; Work Order General Notes; general or site specific notes referenced on the plan set; other City design manuals or policies; or the design engineer's site specific edits.

6.8 Alleys

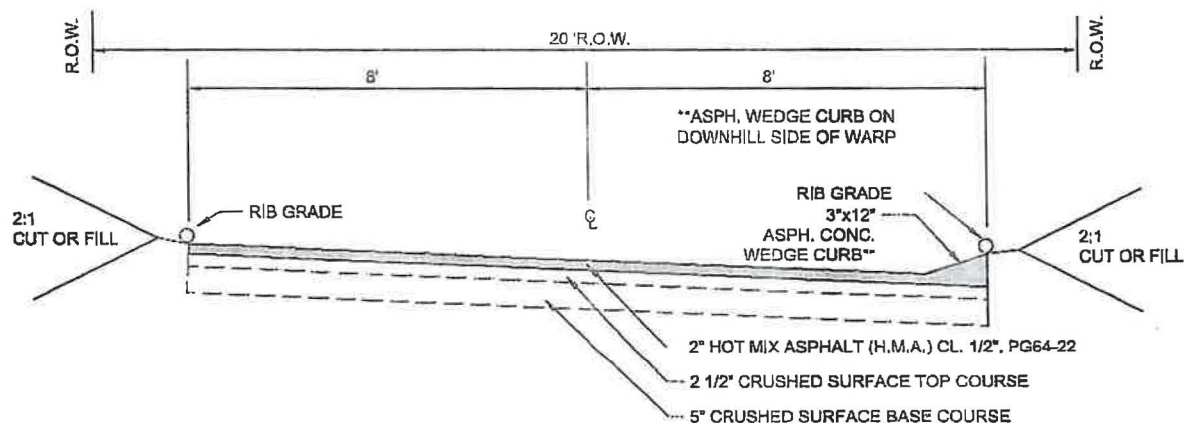
A minimum ROW width of an alley in a residential block, when platted, shall be 20 feet. Alleys may be required in the rear of commercial and industrial districts and, where required, shall have a ROW of at least 20 feet (per TMC 13.04.200).

Improvements of alley ROW may be required when the alley is to be utilized as access to a residence, parking lot, or as otherwise directed by Traffic Engineering or the Site Development Group. Typical alley designs shall conform to Standard Plan PD-01. Incorporation of Low Impact Development BMPs is encouraged when practicable (see the SWMM).

The geometric design for alleys shall conform to the criteria as set forth in Section 2 of this chapter using a 20 mph design speed, when practicable. The typical paved width of an alley in a residential area is 16 feet with wedge curbs on both sides. When constructing a new alley that connects to existing or proposed curb and gutter, a concrete alley return conforming to City Standard Plan SU-09 shall be provided. City Standard Plan SU-09 also details the sidewalk section through the alley. Please note that for historic districts, special design standards may apply.

Figure 4-10 shows the typical alley section, which may also be used for private accessways and driveways.

Figure 4-10: Typical Alley Section



6.9 Dead Ends

Dead-end roadways shall not be allowed without approval of the City Traffic Engineer.

To promote connectivity, roadways shall connect with nearby existing roadways except in cases when topography, land ownership, or other factors make this infeasible. In cases when it is not feasible to connect roadways but it is feasible to establish a non-motorized pathway then the pathway shall be constructed.

In general, dead end streets shall not be longer than 500 feet. Any dead end street in excess of 150 feet in length shall terminate in a turn-around or cul-de-sac (see Sections 6.10 and 6.11). Any dead end street with four or fewer lots accessing the street may

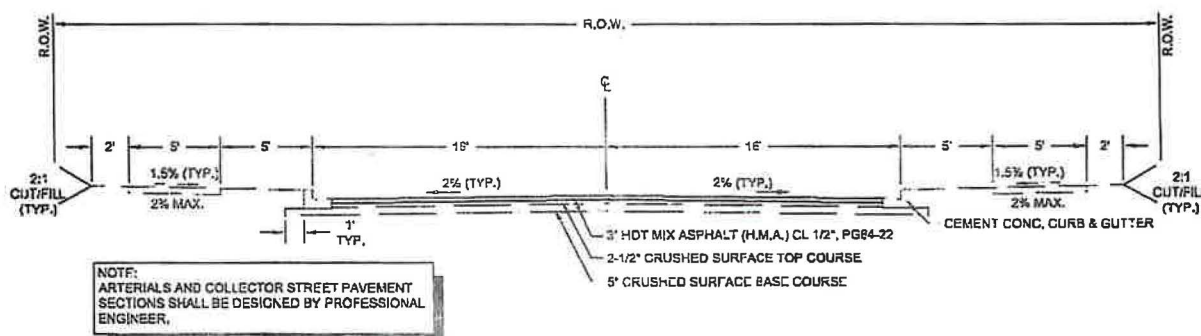
KK 7/11 EX D

Table 4-6: Design Requirements for Developments

	Greater than 4 Lots	3 to 4 Lots	2 Lots
Designation	Public street ROW or private street easement	Private accessway	Private accessway
ROW or Easement Width	52 feet ¹	32 feet ¹	27 feet ¹
Pavement Width	28 feet ²	24 feet ²	16 feet with additional 4 feet graded and graveled surface to meet the requirements of the International Fire Code
Pavement Section (Residential)	Refer to Section 5 of this chapter		
Driveway	Required at entrance to all lots ³	Required at entrance to private accessway ³	
Sidewalks and Pedestrian Pathways ⁴	Required along all lot frontages	Required along all lot frontages	
Street Trees	Both sides	See TMC 13.06.502.B.2	
Street Edge Improvements ⁵	Both sides	Required for combination sidewalks	
Asphalt Wedge Curb	N/A	Required	

- 1 If constrained by site-specific conditions and with approval by the City Engineer, the shown widths may be reduced to a minimum of 41 feet for private roadways serving more than 4 lots, 30 feet for private roadways serving 3 to 4 lots, and 20 feet for private roadways serving 2 lots.
- 2 For roadways with on-street parking, 28 feet is the required minimum width. In limited circumstances this width may be reduced to a minimum of 20 feet, with City Engineer approval. These circumstances are outlined in Section 5.1 of this chapter.
- 3 A temporary asphalt driveway approach is required when no concrete curb and gutter exists on the City street. A cement concrete driveway approach is not allowed unless concrete curb and gutter is either present, or will be installed with the driveway approach. Approved pervious pavement sections may be allowed in either case.
- 4 Pedestrian accessibility shall be required for each lot.
- 5 Street edge improvements include gutter, planting strip and street trees.

Figure 4-9: Typical 32 feet Residential Street Section



503.1.2 Additional access. The *fire code official* is authorized to require more than one fire apparatus access road based on the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions or other factors that could limit access.

503.1.3 High-piled storage. Fire department vehicle access to buildings used for *high-piled combustible storage* shall comply with the applicable provisions of Chapter 32.

503.2 Specifications. Fire apparatus access roads shall be installed and arranged in accordance with Sections 503.2.1 through 503.2.8.

503.2.1 Dimensions. Fire apparatus access roads shall have an unobstructed width of not less than 20 feet (6096 mm), exclusive of shoulders, except for *approved* security gates in accordance with Section 503.6, and an unobstructed vertical clearance of not less than 13 feet 6 inches (4115 mm).

503.2.2 Authority. The *fire code official* shall have the authority to require or permit modifications to the required access widths where they are inadequate for fire or rescue operations or where necessary to meet the public safety objectives of the jurisdiction.

503.2.3 Surface. Fire apparatus access roads shall be designed and maintained to support the imposed loads of fire apparatus and shall be surfaced so as to provide all-weather driving capabilities.

503.2.4 Turning radius. The required turning radius of a fire apparatus access road shall be determined by the *fire code official*.

503.2.5 Dead ends. Dead-end fire apparatus access roads in excess of 150 feet (45 720 mm) in length shall be provided with an *approved* area for turning around fire apparatus.

503.2.6 Bridges and elevated surfaces. Where a bridge or an elevated surface is part of a fire apparatus access road, the bridge shall be constructed and maintained in accordance with AASHTO HB-17. Bridges and elevated surfaces shall be designed for a live load sufficient to carry the imposed loads of fire apparatus. Vehicle load limits shall be posted at both entrances to bridges where required by the *fire code official*. Where elevated surfaces designed for emergency vehicle use are adjacent to surfaces that are not designed for such use, *approved* barriers, *approved* signs or both shall be installed and maintained where required by the *fire code official*.

503.2.7 Grade. The grade of the fire apparatus access road shall be within the limits established by the *fire code official* based on the fire department's apparatus.

503.2.8 Angles of approach and departure. The angles of approach and departure for fire apparatus access roads shall be within the limits established by the *fire code official* based on the fire department's apparatus.

503.3 Marking. Where required by the *fire code official*, *approved* signs or other *approved* notices or markings that include the words NO PARKING—FIRE LANE shall be

provided for fire apparatus access roads to identify such roads or prohibit the obstruction thereof. The means by which *fire lanes* are designated shall be maintained in a clean and legible condition at all times and be replaced or repaired when necessary to provide adequate visibility.

503.4 Obstruction of fire apparatus access roads. Fire apparatus access roads shall not be obstructed in any manner, including the parking of vehicles. The minimum widths and clearances established in Sections 503.2.1 and 503.2.2 shall be maintained at all times.

503.4.1 Traffic calming devices. Traffic calming devices shall be prohibited unless *approved* by the *fire code official*.

503.5 Required gates or barricades. The *fire code official* is authorized to require the installation and maintenance of gates or other *approved* barricades across fire apparatus access roads, trails or other accessways, not including public streets, alleys or highways. Electric gate operators, where provided, shall be *listed* in accordance with UL 325. Gates intended for automatic operation shall be designed, constructed and installed to comply with the requirements of ASTM F2200.

503.5.1 Secured gates and barricades. Where required, gates and barricades shall be secured in an *approved* manner. Roads, trails and other accessways that have been closed and obstructed in the manner prescribed by Section 503.5 shall not be trespassed on or used unless authorized by the *owner* and the *fire code official*.

Exception: The restriction on use shall not apply to public officers acting within the scope of duty.

503.6 Security gates. The installation of security gates across a fire apparatus access road shall be *approved* by the *fire code official*. Where security gates are installed, they shall have an *approved* means of emergency operation. The security gates and the emergency operation shall be maintained operational at all times. Electric gate operators, where provided, shall be *listed* in accordance with UL 325. Gates intended for automatic operation shall be designed, constructed and installed to comply with the requirements of ASTM F2200.

SECTION 504

ACCESS TO BUILDING OPENINGS AND ROOFS

504.1 Required access. Exterior doors and openings required by this code or the *International Building Code* shall be maintained readily accessible for emergency access by the fire department. An *approved* access walkway leading from fire apparatus access roads to exterior openings shall be provided where required by the *fire code official*.

504.2 Maintenance of exterior doors and openings. Exterior doors and their function shall not be eliminated without prior approval. Exterior doors that have been rendered non-functional and that retain a functional door exterior appearance shall have a sign affixed to the exterior side of the door with the words THIS DOOR BLOCKED. The sign shall consist of letters having a principal stroke of not less than $\frac{3}{4}$ inch (19.1 mm) wide and not less than 6 inches (152 mm) high on a contrasting background. Required fire department access