



## **AGENDA**

**MEETING:** Regular Meeting  
**TIME:** Wednesday, April 2, 2014, 4:00 p.m.  
**LOCATION:** Room 16, Tacoma Municipal Building North  
733 Market Street, Tacoma, WA 98402

### **A. Call to Order**

### **B. Quorum Call**

### **C. Approval of Minutes** – Regular Meeting and Public Hearing on March 19, 2014

### **D. Discussion Items**

#### **1. Amtrak Station Relocation**

Review the status of the proposed relocation of Amtrak's Tacoma Station from its current location on Puyallup Avenue to Freighthouse Square.

(See "Agenda Item D-1"; Cheri Gibbons, 591-5379, [cgibbons@cityoftacoma.org](mailto:cgibbons@cityoftacoma.org))

#### **2. 2014 Annual Amendment Package**

Review public comments received at the public hearing on March 19, 2014 and through the comment period ending on March 21, 2014, and consider appropriate modifications to the proposed amendments.

(See "Agenda Item D-2"; Lihuang Wung, 591-5682, [lwung@cityoftacoma.org](mailto:lwung@cityoftacoma.org))

### **E. Communication Items & Other Business**

(a) Infrastructure, Planning and Sustainability Committee meeting, April 9, 2014, 4:30 p.m., Room 16; agenda includes:

- Transportation Master Plan
- Parking System Initiatives

(b) Planning Commission meeting, April 16, 2014, 4:00 p.m., Room 16; agenda includes:

- Sustainability Tools for Assessing and Rating (STAR) Communities
- Development and Permitting Activity Report
- 2014 Annual Amendment to the Comprehensive Plan and Land Use Regulatory Code

### **F. Adjournment**







## **MINUTES** (draft)

**TIME:** Wednesday, March 19, 2014, 4:00 p.m.

**PLACE:** Council Chambers, Tacoma Municipal Building  
747 Market Street, Tacoma, WA 98402

**PRESENT:** Sean Gaffney (Chair), Scott Winship (Vice-Chair), Alexandria Teague, Erle Thompson, Stephen Wamback

**ABSENT:** Chris Beale, Donald Erickson, Benjamin Fields, Tina Lee

### **A. CALL TO ORDER**

Chair Gaffney called the meeting to order at 4:02 p.m.

### **B. QUORUM CALL**

A quorum was declared.

### **C. APPROVAL OF MINUTES**

The minutes of the regular meeting on February 19, 2014 were approved as submitted.

### **D. DISCUSSION ITEMS**

#### **1. Hilltop Subarea Plan**

Brian Boudet, Planning Services Division Manager, facilitated the Planning Commission's review of the draft Findings of Fact and Recommendations Report for the draft Hilltop Subarea Plan. He provided an overview of the community vision set forth at the initial stage of the project, the diverse local membership of the Community Working Group for the project, the outreach efforts throughout the project, the key implementation strategies developed, and the community's concerns and issues heard at the Commission's public hearing on January 22, 2014.

One of the major concerns of the community was relating to affordable housing and potential gentrification. The draft plan that was provided for public review included a specific goal regarding affordable housing. In response to the testimony, staff discussed the issue further with members of the Community Working Group and the affordable housing community, and the following revision (underlined) to Goal NR-7 was proposed:

**GOAL NR-7** At least 25% of the total housing units in Hilltop shall be affordable to households earning up to 80% of the countywide median income, and at least half of that (12.5%) shall be affordable to households earning up to 50% of the countywide median income.

Discussion ensued. The Commission concurred with said revision and understood that the draft Findings of Fact and Recommendations Report would be amended accordingly. The Commission voted unanimously to approve the report, along with the Letter of Recommendation, forwarding the draft Hilltop Subarea Plan and EIS to the City Council for consideration for adoption.

## 2. Shoreline Implementation Initiatives

Stephen Atkinson, Planning Service Division, provided an overview of some of the initiatives and programs recently undertaken to implement the Shoreline Master Program that was updated in November 2013. Those initiatives include:

- An interlocal agreement with the City of University Place pertaining to permit review of the Narrows Marina phased master plan;
- An interlocal agreement with the Port of Tacoma pertaining to the provision of shoreline public access. The agreement identifies appropriate off-site mitigation locations consistent with the Shoreline Master Program, provides credit for existing public access improvements undertaken by the Port of Tacoma, and establishes a methodology for calculating a fee-in-lieu of public access for Port development projects;
- An update on the status of the Public Access Alternatives Plan and Tacoma Waterfront Design Guidelines recommended by the Planning Commission during the 2013 annual amendment process; and
- A brief look at recent development projects in the shoreline as well as opportunities for funding public access projects that advance the goals and objectives of the Shoreline Master Program.

[The Planning Commission took a recess at 4:50 p.m.]

## 3. Public Hearing – 2014 Annual Amendment

At 5:00 p.m., Chair Gaffney called the public hearing to order and reviewed the procedures. Lihuang Wung, Planning Services Division, provided an overview of the nine applications (proposals) contained in the 2014 Annual Amendment Package, the outreach efforts throughout the analysis stage of the applications, and the dissemination of the public hearing notice. Chair Gaffney called for testimony. The following citizens testified:

(1) **Milt Tremblay, University of Washington Tacoma:**

Mr. Tremblay thanked the Commission and staff for working with the University through the annual amendment process. He stated that for the most part the changes proposed are positive and the University supports and even wants to go above and beyond the requirements. He suggested that the City continue to look at the University as a campus; for example, regarding the bicycle parking and electric vehicle parking, not every building on the campus may need to meet these requirements, if the requirements are already met at a neighboring building.

(2) **Jeremiah Lafranca, Master Builders Association (MBA):**

Mr. Lafranca thanked the Commission and staff for working on the amendments and for keeping the MBA and the Affordable Housing Policy Advisory Group involved in the process. Regarding the application of "Sustainability Code Amendment", Mr. Lafranca pointed out that the electric vehicle parking requirements for multi-family housing may become a logistical issue if the spots are installed before the residents move in, which may cause additional cost later if they need to be moved, and that electric vehicles should not be government regulated, but an incentive-based program, as the future of electric vehicles is uncertain with other new energy-efficient vehicles emerging. Regarding the application of "Plan and Code Cleanup", Mr. Lafranca was concerned that the proposed setback requirements for pipestem lots would limit the size of buildings which would inhibit development and counteract the Growth Management Act.

(3) **Jennifer Chin:**

Ms. Chin expressed her desire for more car-sharing opportunity in Tacoma, as well as much more bicycle parking.

(4) **Katherine Sutalo, Metro Parks Tacoma (MPT):**

Ms. Sutalo expressed appreciation to staff for collaborating with MPT and other agencies to work on the Open Space Habitat and Recreation Element and the Urban Forestry Landscaping Code Update. She stated that MPT is concerned that the Overall Site Landscaping Requirements would not leave

the trees enough space to grow; that the Plant Materials Selection would not achieve the intent and would actually foster less diversity of trees; and that tree diversity would best be addressed City-wide and not lot-by-lot. She also commented that the Self-Managed Agency provisions that MPT worked with the City to create in January are not reflected in the final proposal and that the current language calls for more detailed oversight of agencies by the City. MPT looks forward to working with City Staff to create a version of the Self-Managed Agencies provisions that better reflect the cooperative relationship that MPT has with the City and other agencies.

(5) **Curtis Hancock, MPT:**

Mr. Hancock spoke in favor of the Point Defiance Park Land Use Policies. He pointed out that Point Defiance is an obvious destination in itself and that the Development Regulation Agreement (DRA) is an excellent vehicle to facilitate the continued development of the park, rather than using piecemeal conditional use permits.

(6) **Jennifer Halverson Kuehn, Bicycle and Pedestrian Technical Advisory Group (BPTAG):**

Ms. Kuehn expressed BPTAG's support to the Sustainability Code Amendment, particularly bicycle parking related provisions. BPTAG applauds the City in their effort to recognize and encourage transportation modes that have the least environmental impact. BPTAG believes that adopting these policies will advance the vision of the Mobility Master Plan and create a healthier living environment for the residents of the City.

(7) **Kell McAboy, Port of Tacoma:**

Ms. McAboy expressed the Port of Tacoma's support for the new Container Port Element and thanked City staff for collaborating with the Port in developing the element.

(8) **Christine Phillips, BCRA:**

Ms. Phillips pointed out that BCRA has been working with MPT and the City on the proposed amendments associated with the application of "Point Defiance Park Land Use Policies" and setting the foundation for the Development Regulation Agreement, which is a big-picture plan that includes indication for environmental mitigations and covers all aspects of major development of the Point Defiance Park for the next 20 years.

(9) **Kris Symer, BPTAG:**

Ms. Seymour commented that BPTAG would like to see an enhancement in bicycle parking within public spaces, and make sure this is happening even when no new or significant infrastructure is occurring.

(10) **J. J. McCament, Point Ruston:**

Ms. McCament thanked the Commissioners and staff for visiting Point Ruston in December 2013. She provided a follow-up on the issues raised in December relating to transit and affordable housing. Regarding transit, Point Ruston has started construction on Building 1A, which will provide ample parking for cars, bicycles, motorcycles, along with the recruitment of a company that would rent and/or sell bicycles for people to use along the Waterwalk. Point Ruston is also preparing a response to Pierce Transit's Long-Range Plan 2040, indicating that the LID improvements on Ruston Way include bus stops. Regarding affordable housing, Point Ruston has discussed with the Tacoma Housing Authority on ways to provide affordable housing for those earning less than 80% of Average Median Income. Point Ruston has also done research about regional micro-apartments, analyzed current rents at Point Ruston in context of the 2014 Affordable Housing Availability and Income Limits, looked at competitive properties that are using the multifamily tax-exemption, and drafted an informal survey to gain information regarding the local acceptance of micro-apartments.

Seeing no more citizens coming forward to testify, Chair Gaffney reiterated that the public hearing record will remain open through March 21, 2014 to receive written comments, and closed the public hearing at 5:35 p.m.

**E. COMMUNICATION ITEMS AND OTHER BUSINESS**

Mr. Wung provided the following information:

- Agenda for the Infrastructure, Planning & Sustainability Committee's meeting on March 26, 2014;
- Agenda for the Planning Commission's meeting on April 2, 2014;
- The Planning Commission's recommendations on the Proposed Regulations for Temporary Homeless Camp Permitting Process were reviewed by the City Council's Neighborhood and Housing Committee on March 17, 2014 and will be reviewed by the City Council at the study session on March 25, 2014; and
- The Commissioners are encouraged to attend the "Committees, Boards and Commissions Member Training" session on March 20, 2104.

Mr. Boudet informed the Commission that the City will retain a consultant to guide the strategic planning and visioning process for the development of a Strategic Plan by the end of the year, which will set the course for Tacoma over the next decade and will help lay the ground work for the 2015 Comprehensive Plan Update as mandated by the Growth Management Act.

**F. ADJOURNMENT**

The meeting was adjourned at 5:40 p.m.



City of Tacoma  
Planning and Development Services

**Agenda Item  
D-1**

**To:** Planning Commission  
**From:** Cheri Gibbons, Planning Services Division  
**Subject:** **Amtrak Station Relocation**  
**Meeting Date:** April 2, 2014  
**Memo Date:** March 27, 2014

At the next meeting on April 2, 2014, the Planning Commission will review the status of the Relocation of Amtrak's Tacoma Station from Puyallup Avenue to Freighthouse Square. Commissioner Donald Erickson who has been leading the Citizen's Advisory Committee (CAC) for the project will take the lead in providing this briefing.

The CAC was established by the City of Tacoma in February 2013 to help ensure that the interests of the city, the residents and businesses of the Dome District, and South Downtown were represented in the development of station relocation criteria. The CAC has recently completed its work and recommended that the new greater Tacoma Amtrak train station be sited at the east end of Freighthouse Square.

Attached is the CAC's letter of March 19, 2014, transmitting its preliminary siting findings and recommendations to T.C. Broadnax, City Manager, who subsequently forwarded the CAC's recommendations to the Washington State Department of Transportation that is managing the station relocation for Amtrak as part of its Point Defiance Bypass project.

If you have any questions, please contact me at (253) 591-5379 or [cgibbons@cityoftacoma.org](mailto:cgibbons@cityoftacoma.org).

Attachment

c: Peter Huffman, Director



City of Tacoma

Community and Economic Development Department  
Planning and Development Services Department

March 19, 2014

T.C. Broadnax, City Manager  
747 Market Street, Room 1200  
Tacoma, WA 98402

RE: Amtrak Station Relocation Citizen's Advisory Committee Preliminary Siting Findings and Recommendation

Dear Mr. Broadnax,

On behalf of the Amtrak Station Relocation Citizen Advisory Committee, I am pleased to transmit our findings and recommendation to you and the Mayor:

WHEREAS, Amtrak has agreed to relocate its Tacoma Station from its current location on Puyallup Avenue to Freighthouse Square;

WHEREAS, WSDOT is managing the relocation of the Tacoma Station for Amtrak as part of its Point Defiance Bypass project;

WHEREAS, the Washington State Legislature has committed sufficient funds to ensure the rebuilding of the existing Milwaukee Trestle with double tracks and a loading platform of sufficient in length so that Amtrak trains will not ordinarily block East "C" and East "D" Streets during station stops;

WHEREAS, the Amtrak Station Relocation Citizen's Advisory Committee (CAC) was established by the City of Tacoma in February 2013 to help ensure that the interests of the city, the residents and businesses of the Dome District, and South Downtown were represented in the development of siting criteria, preliminary guidelines pertaining transit oriented development (TOD), the relationship of the future station to its surroundings, and how it would be sited to minimize potential adverse impacts and maximize benefits;

WHEREAS, the CAC members in multiple meetings and subsequent correspondence expressed major concerns about Amtrak trains blocking critical north-south streets East "C" and East "D" Streets during station stops and station related traffic disrupting pedestrian and vehicular flows on the recently improved "D" Street and East 25th Avenue with its limited on-street parking;

WHEREAS, progress is being made on a "Quiet Zone" designation to facilitate future TOD and this designation should be fully considered in the Amtrak station development;

WHEREAS, WSDOT has from the beginning stressed the importance of the Amtrak station at FHS having its own standalone security, pointing out that the operating hours of the station will be independent of those of FHS's pedestrian mall and those of its multiple tenants;

WHEREAS, following Amtrak's December 9th, 2013 where the public was presented with Amtrak's initial station siting at the west end of FHS most of those in attendance expressed serious concerns about this location potentially having adverse impacts on the feasibility of future TOD on vacant sites near East "D" and East 25th Street;

WHEREAS, the CAC has consistently stressed the importance of maintaining the economic viability of FHS not just during construction of the new Amtrak station and the construction of Milwaukee trestle replacement, but obviously longer term, it being both a popular community landmark but also the largest retail complex in the Dome District;

WHEREAS, Pierce Transit has announced a new project that will create between three and four new bus zones on East "G" Street between East 25th and Puyallup Avenue with service beginning in 2015;

WHEREAS, the owner and management team of FHS expressed their concern about both station and trestle construction impacting the economic viability of the building and its tenants and indicated a preference for siting the new Amtrak station at the building's east end since in doing so it would consolidate most construction impacts primarily to a single area;

WHEREAS, WSDOT has noted that foundation deficiencies at the east end of FHS would most likely affect construction, they also indicated that such deficiencies would likely apply anywhere the station was sited within the building; and,

WHEREAS, WSDOT indicated a concern about how previously identified contaminated soils at the east end of FHS might affect construction, they also acknowledged that they knew little about soil conditions elsewhere at FHS.

#### COMMITTEE SITING RECOMMENDATION:

That the new greater Tacoma Amtrak train station be sited at the east end of Freighthouse Square, for the following reasons:

1. It would consolidate construction activity and coordination between the trestle replacement and new platform projects with that of the new station;
2. It would leave the more visible iconic west end of Freighthouse Square free to function as a gateway entrance into its interior mall or possibly retain this "100 percent" corner for a major retail or food service establishment oriented to East "D" Street, a City designated pedestrian street;
3. It would facilitate pedestrian flow continuity, critical to FHS's economic viability as a pedestrian mall, through this iconic 1,000 foot, or so, long building;
4. It would move station-related traffic e.g. "kiss and ride", taxi, van, and handicapped parking, to a portion of the building where it is less likely to impact existing heavily trafficked streets such as East "D" Street and be closer to off-street parking and bus service;
5. It would accommodate, in a vertical format, a clearer separation between different station functions while possibly taking advantage of the higher open trussed sky lit ceilings and greater building width at that end of the building;
6. It would allow the new Amtrak station to function independently from the rest of Freighthouse Square when the latter is closed and assume chief responsibility for its own security needs; and,

7. It would potentially allow for future pedestrian and service vehicle access underneath the new trestle to a future platform on the south side of tracks if the need ever arises in the future because of grade differences at this end of the structure.

Passed this 19th day of March, 2014.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald K. Erickson". The signature is fluid and cursive, with a large initial "D" and "E".

Donald K. Erickson, AICP, Chair  
Amtrak Station Relocation Citizen's Advisory Committee

cc: Ricardo Noguera, Director, Community and Economic Development Department  
Peter Huffman, Director, Planning and Development Services



City of Tacoma  
Planning and Development Services

**Agenda Item  
D-2**

**To:** Planning Commission  
**From:** Lihuang Wung, Planning Services Division  
**Subject:** **2014 Annual Amendment – Comments and Reponses**  
**Date of Meeting:** April 2, 2014  
**Date of Memo:** March 27, 2014

The Planning Commission conducted a public hearing on March 19, 2014, to receive testimony on the Proposed Amendments to the Comprehensive Plan and Land Use Regulatory Code for 2014 (or “2014 Annual Amendment”), and kept the record open through March 21, 2014 to accept written comments.

At the next meeting on April 2, 2014, the Commission will review public comments received, staff’s responses to the comments, and potential modifications as suggested by staff to the Proposed Amendments in response to certain comments. To facilitate the Commission’s review, staff has compiled a *Public Comments and Staff Responses and Suggestions Report*, as attached. The report includes a summary of the oral testimony received on March 19<sup>th</sup> and copies of letters and e-mails received through March 21<sup>st</sup>. Staff will seek the Commission’s concurrence with staff’s responses and suggestions.

If you have any questions, please contact me at 591-5682 or [lwung@cityoftacoma.org](mailto:lwung@cityoftacoma.org).

Attachment

c: Peter Huffman, Director





## 2014 ANNUAL AMENDMENT TO THE COMPREHENSIVE PLAN AND LAND USE REGULATORY CODE

### Public Comments and Staff Responses and Suggestions Report

April 2, 2014

The Planning Commission conducted a public hearing on March 19, 2014, concerning the Proposed 2014 Annual Amendment to the Comprehensive Plan and Land Use Regulatory Code and kept the record open through March 21, 2014 to accept written comments.

A *Public Review Document* was compiled and made available for public review prior to the public hearing. The document includes the complete text and staff analyses of the nine applications (or proposed amendments), the Preliminary Determination of Environmental Nonsignificance and the environmental checklist associated with the applications, as well as relevant background information.

This report, prepared for the Planning Commission's review and discussion on April 2, 2014, summarizes public comments received during the public hearing process, identifies major issues and concerns reflected therein, provides staff responses to the issues and concerns, and suggests modifications, where appropriate, to the proposed amendments as contained in the *Public Review Document*. In addition to public comments, there are internal-review comments provided by various City departments. Those comments and the corresponding staff responses and suggestions are also compiled in the report.

The report includes three appendices. Appendix A provides a list of the commenters; Appendix B summarizes the oral testimony received at the public hearing on March 19, 2014; and Appendix C compiles written comments received through March 21, 2014.

Comments	Commenters (Appendix A)	Staff Responses and Suggestions
<b>1. Point Ruston Mixed-Use Center</b> (Application #2014-01)		
Supports the proposal.	Rose, Kingsbury, Pedersen/Mirra	<ul style="list-style-type: none"> <li>Support noted. Staff note that all the commenters expressed support for the MUC designation, including those who also raised specific questions or issues.</li> </ul>
<ul style="list-style-type: none"> <li>Calls for policies and mechanisms to provide for the inclusion of housing that is affordable to lower income households.</li> </ul>	Pedersen/Mirra	<ul style="list-style-type: none"> <li>Comments noted. The Planning Commission has signaled that housing affordability is an important issue. The AHPAG's support for the designation, along with their call to develop policies and mechanisms to provide for affordable housing is significant, as the AHPAG is the City Council's appointed advocates on affordable housing. See below for additional discussion.</li> </ul>

<p>The applicants provided summaries of their efforts to address two issues of significance to this proposal:</p> <p>Transit:</p> <ul style="list-style-type: none"> <li>• Bike storage being provided with current building permits; courting a bike shop;</li> <li>• Preparing to comment on Pierce Transit's 2040 Plan (having already provided transit improvements on Ruston Way).</li> </ul> <p>Affordable Housing:</p> <ul style="list-style-type: none"> <li>• Engaging with Tacoma Housing Authority to develop strategies for housing for people earning less than 80 percent Area Median Income (AMI);</li> <li>• Exploring affordable housing types like micro-apartments, along with amenities like Zipcar and a bicycle shop;</li> <li>• Analyzed rents in relation to the Multifamily Tax Exemption (MFTE) Program;</li> <li>• Drafted an informal market survey on micro-apartments.</li> </ul>	<p>Cohen, McCament</p>	<ul style="list-style-type: none"> <li>• Comments noted. The Planning Commission had previously signaled that while Point Ruston is generally consistent with the City's MUC goals and policies, two significant issues remain for further consideration—transit and affordable housing. The applicants had indicated their intention to work on these issues during the comment period. Their comments express a commitment to addressing them and lay out a list of actions.</li> <li>• Staff note that providing transit service is outside the applicants' direct control. They have built bus stop pads in preparation for future service on Ruston Way and are engaging with Pierce Transit's planning efforts. Furthermore, the discussion has broadened to accommodating other alternatives to travel by car. The site is well-connected to bike/pedestrian facilities, and the applicants have asserted they are working on approaches such as Zipcar and bike rentals. In staff's view, the characteristics of the development and the applicants' commitments to take action substantially meet the transit-oriented and multi-modal intents of the MUCs.</li> <li>• Likewise, staff note the applicants have expressed their commitment to a range of affordable housing strategies. Furthermore, based on comments received there is strong support for the MUC designation itself, even on the part of the AHPAG and another commenter who called attention to specific issues. Therefore, staff are preparing recommendations on an approach that would move the MUC designation forward while providing assurances to the public that the affordable housing issues will be addressed. For example, the City Council could designate Point Ruston as an MUC, with the stipulation that use of the MFTE Program would become authorized upon formalization of an affordable housing agreement between Point Ruston LLC and the City. Staff are currently engaging with the applicants on this, and if the Commission so directs, will be providing the details on policy and code language at the next Commission meeting.</li> </ul>
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<p>Concerned about consistency with Shoreline Permit and FSEIS approvals. Cites instances in which the City is considering approving development actions that would depart from those approvals.</p>	<p>White</p>	<ul style="list-style-type: none"> <li>• Comments noted. Staff's analysis is that the issues raised here do not have direct bearing on the proposal to designate Point Ruston as a new MUC. Though the City of Ruston does identify a potential conflict with the amount of surface parking as it relates to the goals of the Mixed-Use Center, Ruston is primarily identifying potential conflicts between the attached site plan and the approved shoreline permit and existing FEIS.</li> <li>• Long Range staff referred the comments to Jana Magoon, PDS Current Planning Manager, who provided the following response:  The proposed designation of Pt. Ruston as a Mixed-Use Center does not alter the approved shoreline permits, the shoreline regulations applicable to the proposed development, or the existing FEIS. The City of Tacoma will continue to utilize the maps associated with the FEIS and approved shoreline permits to evaluate development of the site. Maps submitted with this application, in so much as they deviate from approved plans, are not approved through this process.</li> </ul>
<p><b>2. Point Defiance Park Land Use Policies</b> (Application #2014-02)</p>		
<p>Supports the proposal, which will help to achieve the vision for Point Defiance Park and provide a clear and appropriate City review process.</p>	<p>Hancock, Phillips</p>	<p>Support noted.</p>
<p><b>3. Mixed-Use Centers Code Review (MUC-Lite)</b> (Application #2014-04)</p>		
<p>No comments received</p>		

**4. Affordable Housing Policies and Regulations** (Application #2014-06)

<ul style="list-style-type: none"> <li>• Supports the code changes proposed, which will help to achieve affordable housing goals.</li> <li>• The AHPAG is prepared to continue the review of affordable housing recommendations next year.</li> </ul>	<p>Pedersen/ Mirra</p>	<ul style="list-style-type: none"> <li>• Support noted. This proposal is intended to implement AHPAG recommendations. The AHPAG helped to guide this effort as the City Council's appointed body working on affordable housing issues.</li> <li>• Staff continue to meet regularly with the AHPAG with the intention of developing a package of recommendations for the inclusion in the 2015 Annual Amendments. The subjects will include Affordable Housing Incentives Code and Program, including bonuses and incentives; and, affordable building/residential infill strategies, including cottage housing, detached Accessory Dwelling Units, Planned Residential Districts updates, and other proposals.</li> </ul>
<ul style="list-style-type: none"> <li>• Supports the Small Lots proposals.</li> <li>• Roof line options are limited for narrow houses, how will that issue be handled?</li> </ul>	<p>Brown</p>	<p>Support and comments noted. The proposed amendments include minor modifications to the Small Lot Standards provisions on rooflines. The changes are intended to provide additional flexibility while meeting the intent of minimizing overshadowing of neighboring properties on small lots. Staff spoke with Mr. Brown and he stated he is comfortable with the proposed approach.</p>
<p>Does not support requiring a street tree as part of small lot standards.</p>	<p>Rody</p>	<p>Comments noted. The proposal would add a requirement that one street tree be planted on development of lots more than 10% smaller than the applicable standards. Street trees enhance residential neighborhood character and soften the built environment, which is appropriate with higher densities. Staff note that the proposed Landscaping Code updates would allow flexibility including the fee in lieu option if planting trees is problematic on a specific site.</p>

**5. Container Port Element** (Application #2014-07)

<p>Supports the proposal</p>	<p>McAboy</p>	<p>Support noted.</p>
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**6. Open Space Habitat and Recreation Element** (Application #2014-08)

<ul style="list-style-type: none"> <li>• Support for the proposed updates.</li> </ul>	<p>Coughlan/ Cutting</p>	<ul style="list-style-type: none"> <li>• Support noted.</li> </ul>
<p>Comments related to specific sections of the draft, including:</p> <ol style="list-style-type: none"> <li>1. Open Space System – TPU and Port lands have a role</li> <li>2. Update canopy cover goal to be consistent with “30 by 30”</li> <li>3. Update community gardens program discussion</li> <li>4. Habitat stewardship outreach and training – reflect ongoing progress</li> <li>5. Implementation and funding – reflect evolving roles among agencies</li> </ol>	<p>Fraser, Sutalo</p>	<p>Staff concur with the majority of MPT’s and Ms. Sutalo’s comments. These comments will help ensure the OSHRE reflects recent progress and policy direction, which is one of the key objectives of this effort. Staff recommend the following changes:</p> <ol style="list-style-type: none"> <li>1. Clarify the <b>Open Space System</b> section as follows (page 7/230): This system of open space lands is made up of both public and private ownerships. On the public side, the City and Metro Parks are the primary owners of most of those lands categorized below. <u>However in addition</u>, the Tacoma School District owns school properties that serve residents’ recreation needs during non-school hours. <u>The Port of Tacoma, Tacoma Public Utilities and other public agencies also manage open space and recreation assets...</u></li> <li>2. Change Policy <b>OS-GI-1 Green Neighborhoods</b> (page 15/238): <del>Establish an achievable goal to increase the forest canopy cover by 2028 to a citywide percentage that achieves Tacoma’s vision as an environmentally sustainable community. Achieve 30 percent citywide tree canopy cover by the year 2030, as called for in the Urban Forest Policy Element. Determine the existing canopy coverage and</del> Develop a process to monitor progress toward achieving the identified goal. <u>Update the goal as progress is made. Amend the Comprehensive Plan to adopt the specific canopy goal once it is established.</u></li> <li>3. Update the Community Gardens discussion (page 16/239) to reflect the evolving relationships between the City, MPT and the Pierce Conservation District.</li> <li>4. Update <b>OS-HA-11 Habitat Stewardship Outreach and Training</b> (page 21/244) to reflect ongoing progress.</li> <li>5. Add the following to the <b>Implementation and Funding</b> section (page 23/246): Several City departments work in collaboration to achieve the objectives of the OSHRE, in partnership with MPT and other public agencies. In general, MPT is the primary provider of parks and recreation amenities. For the City’s part, the Environmental Services Department is in the lead for natural open space conservation and restoration, and the Planning and Development Services Department promotes active recreation. The City, Metro Parks and other agencies collaborate in multiple ways, and continue to explore collaborative approaches to better achieve Tacoma’s parks and open space vision and goals.</li> </ol>

<ol style="list-style-type: none"> <li>6. Transfer of General Government Property – reflect evolving roles among agencies</li> <li>7. Views – clarify policy direction on vegetation management</li> <li>8. Plans for Specific Areas – clarify intent of this section</li> <li>9. Measuring and Reporting Progress – provide more detail</li> </ol>	<p>Fraser, Sutalo</p>	<ol style="list-style-type: none"> <li>6. Update OS-CW-2 Transfer of General Government Property (page 27/250) to reflect that properties deemed unnecessary for their current function should be evaluated for designation as open space, and in some cases for transfer to MPT or other entities.</li> <li>7. Update <b>OS-LF-12 Scenic Views – Private Benefit</b> (page 29/252) to indicate that tree topping or removal on public land for private view benefit should not be allowed unless as part of a coordinated plan that achieves view, habitat, environmental, slope stability and other objectives.  Update <b>OS-LF-13 Scenic Views – Public Benefit</b> (page 29/252) to indicate that significant public views are described in the Urban Forest Policy Element (see <b>Policy UF-SA-1 Public Views Established</b>, page UF-17).</li> <li>8. Comments noted. The intent of this section is to create a mechanism to formally recognize and keep track of adopted park and open space plans which were sponsored or developed by the City. This list will need to be updated as additional plans are created, and includes a “catch-all” reference to MPT’s Strategic Plan as a whole. No direct purview over MPT’s plans is intended or stated. However, this section does express general support for MPT’s plans which would become applicable when City actions affect them (such as partnerships, resource sharing, and discretionary permit review).</li> <li>9. Comments noted. Elaborating on the approach to measuring and reporting progress is, for the most part, not in this phase. Instead, those steps fit with the upcoming Citywide visioning effort and with the 2015 Annual Amendments.</li> </ol>
<ul style="list-style-type: none"> <li>• Invasive non-native plant species are harmful to habitat health. The City should allow more leeway for volunteers to promptly remove them, and should have maintenance in place to keep new populations from taking hold.</li> <li>• The City must be more proactive in preventing encroachments into community natural areas.</li> </ul>	<p>Hansen</p>	<ul style="list-style-type: none"> <li>• Comments noted. The OSHRE calls for removal of non-native, invasive plants and supports the Green Tacoma Partnership to empower volunteers. While the need is great, significant progress has been made to address invasive plants in open space areas. The Open Space Inventory is being transferred to Environmental Services Department in order to provide more resources for habitat restoration efforts. Code updates have made it significantly easier for volunteers to work within city open space. However, on the issue of City review there is a balance—it is also important to consult with City staff when working in critical areas and on public lands. The CAPO reflects that—many restoration activities are now allowed, but with PDS staff review.</li> <li>• The City has taken action numerous times in the past to address private encroachments into city-owned lands. As the Open Space Inventory is transferred to the Environmental Services Department, this issue can be further explored.</li> </ul>
<p>INTERNAL STAFF REVIEW</p>	<p>PDS</p>	<ul style="list-style-type: none"> <li>• Staff recommend adding an entry in the proposed Open Space Projects list for enhancements to Tollefson Plaza.</li> </ul>

**7. Sustainability Code Amendment** (Application #2014-09)

<ul style="list-style-type: none"> <li>View UWT as a campus and provide flexibility to meet new requirements within the campus footprint and not at a building by building level.</li> </ul>	Clark, Tremblay	<ul style="list-style-type: none"> <li>TMC 13.06A and the South Downtown Subarea Plan contain specific guidelines pertaining to the management of the University of Washington Tacoma campus and allows land use regulations to be met on a campus wide basis rather than by individual site or project-by-project.</li> </ul>
<ul style="list-style-type: none"> <li>A new building on campus should not trigger campus wide improvements.</li> </ul>	Clark, Tremblay	<ul style="list-style-type: none"> <li>Please see the response above. The current proposal utilizes campus-wide student population as the basis for the long-term bicycle parking requirement and staff supports the campus-wide approach.</li> </ul>
<ul style="list-style-type: none"> <li>Provide flexibility for providing ADA capable EV parking spaces when ADA parking spaces are not present or feasible due to site constraints.</li> </ul>	Clark, Tremblay	<ul style="list-style-type: none"> <li>Staff concurs. The intent of the proposed amendments are to locate an electric vehicle charging station in proximity to and accessible from an ADA parking stall, not to designate the EV stall as an ADA reserved facility. Staff is also aware that this requirement, by default, would provide a location preference for electric vehicles. Staff will prepare options for addressing this concern.</li> </ul>
<ul style="list-style-type: none"> <li>The Sustainable Tacoma Commission supports the adoption of the proposed amendments.</li> </ul>	Coughlan/Cutting	<ul style="list-style-type: none"> <li>Support noted.</li> </ul>
<ul style="list-style-type: none"> <li>Should also include actions to protect and sustain the City's natural areas and green belts.</li> </ul>	Hansen	<ul style="list-style-type: none"> <li>Comment noted but the suggestion is outside the scope of the amendments at this time. Could be considered as part of a future annual amendment work program.</li> </ul>
<ul style="list-style-type: none"> <li>Clarify that single-family housing is specifically exempted from the proposed electric vehicle requirements, as intended.</li> </ul>	Lafranca	<ul style="list-style-type: none"> <li>As is noted in the comments, the proposed electric vehicles requirements do not apply to single family. However, staff concurs with the suggestion to add a specific statement to that effect.</li> </ul>
<ul style="list-style-type: none"> <li>Multifamily housing typically utilizes assigned parking spaces, which creates additional logistical complexity and potential cost impacts for providing EV</li> </ul>	Lafranca	<ul style="list-style-type: none"> <li>The proposal would require electric vehicle capacity for 10% of the parking spaces provided. The proposal does not specifically require that these spaces be designated up front, but rather that the electrical capacity and infrastructure is provided in such a manner that 10% of the parking stalls could be converted for EV use in the future. This may entail running conduit to multiple levels of a parking garage such that wiring could be extended to specific parking spaces in the future. Staff will review the language and provide some clarification on this issue as appropriate.</li> </ul>

<ul style="list-style-type: none"> <li>• Should consider utilizing incentives to promote EV rather than regulations</li> </ul>	<p>Lafranca</p>	<ul style="list-style-type: none"> <li>• While the proposal does not provide additional incentives, an incentive-based strategy has been deployed nationally and state-wide. According to a report published by the Western Washington Clean Cities Coalition and the Washington State Plug-In Electric Vehicle Task Force in 2011, state market incentives include multiple sales tax exemptions and exemptions from leasehold excise taxes. In addition, the build out of public EV infrastructure in Washington State is occurring at a rapid pace, providing improved access to charging stations to extend trips. In 2009 Ecototality was awarded over \$100 million from the U.S. Department of Energy to deploy chargers in major cities and metropolitan areas. The project provided 8,300 residential level 2 charging stations through grants and over 6,300 public-use level 2 charging stations. Lastly, according to the “Plug-In Electric Vehicle Readiness Plan for the State of Washington,” Washington State benefits from several competitive advantages in the EV market, including an ideal climate for batteries and low electricity prices compared to other regions.</li> </ul>
<ul style="list-style-type: none"> <li>• Requiring EV infrastructure is wasteful when markets can change quickly and technology is constantly changing.</li> </ul>	<p>Lafranca</p>	<ul style="list-style-type: none"> <li>• While other technologies may be introduced into the auto market, there is an existing, and growing, market for plug-in electric vehicles. Both federal and state policies support the continued development of plug-in electric vehicle infrastructure and forecasts are optimistic that vehicle sales will continue to increase. Over the past 5 to 10 years there has been a convergence in plug-in vehicle technology, and while there are still exceptions, most major automakers are utilizing the same standards for charging systems. The proposal addresses only plug-in electric vehicles and does so in a way that is consistent with market forecasts, which expect growth in plug-in electric vehicles sales but with an expectation that these sales will still only represent a fraction of the vehicles on the road. One distinction between plug-in electric vehicles and hydrogen fuel cell vehicles is that the plug-in electric vehicles require a more decentralized fueling system, typically at a place of residence or a destination, whereas refueling of hydrogen cell vehicles will still occur at fueling stations. It is unlikely that the City’s land use regulations would need to be updated to accommodate hydrogen fuel cell vehicles as the City currently regulates fueling stations.</li> </ul>
<ul style="list-style-type: none"> <li>• The Bicycle and Pedestrian Technical Advisory Group believes the proposed bicycle facility requirements are a huge step forward for active transportation in Tacoma. Applauds efforts to support non-pollution generating transportation options.</li> </ul>	<p>Cook, Symer, Halverson Kuehn</p>	<ul style="list-style-type: none"> <li>• Support is noted.</li> </ul>
<ul style="list-style-type: none"> <li>• Would recommend reconsidering how the proposals apply to existing parks and popular destinations to assure that the facilities are available for the public.</li> </ul>	<p>Cook, Symer, Halverson Kuehn</p>	<ul style="list-style-type: none"> <li>• Suggestion noted.</li> </ul>

<ul style="list-style-type: none"> <li>• Supports bicycle parking requirements and would like to see the City promote more car-sharing opportunities.</li> </ul>	Chin	<ul style="list-style-type: none"> <li>• Support and comment noted.</li> </ul>
<b>8. Urban Forestry Landscaping Code Update</b> (Application #2014-10)		
<ul style="list-style-type: none"> <li>• Support for the proposed updates.</li> </ul>	Coughlin/ Cutting	<ul style="list-style-type: none"> <li>• Support noted.</li> </ul>
<ul style="list-style-type: none"> <li>• The City must not allow any tree cutting in public areas, especially in natural areas.</li> <li>• Planting native trees should have precedent, planting non-native trees near natural areas destabilizes the habitat.</li> </ul>	Hansen	<ul style="list-style-type: none"> <li>• Comments noted. The OSHRE and Urban Forest Policy Elements provide the City's policy direction on these issues. While both call for strong protection for trees on public lands, they also recognize that other considerations including public views, addressing hazards and public access must be balanced with this goal.</li> <li>• Comments noted. Staff note planting natives is allowed but not required in the proposed code updates. Natives are not always the most appropriate choice. However, these comments raise an important issue in regards to tailoring development standards, including landscaping requirements, within designated Habitat Corridors to better promote habitat health. This issue will be continued in future policy discussions. Meanwhile, the City has made progress on developing best management practices for city-owned natural areas.</li> </ul>
<p>Questions regarding requiring utilities to provide street trees:</p> <ul style="list-style-type: none"> <li>• Recognizes the City's intent to improve streetscapes through tree planting (Payne).</li> <li>• Utilities projects that replace sidewalks should be exempt from street trees requirements (Prussen).</li> <li>• Utility ratepayers should not be required to pay for street trees.</li> <li>• It is reasonable for utilities to replace anything damaged or removed (Payne).</li> </ul>	Payne, Guthrie, Prussen	<p>Comments noted. The street trees proposal is based on the following logic:</p> <ul style="list-style-type: none"> <li>• Through multiple actions, the City Council has made it clear that street, sidewalk and right-of-way improvements are to follow the principles and guidelines of Complete Streets. Per the City's guidelines, a Complete Street includes street trees as a basic component.</li> <li>• Through this effort it has been established that the City is expected to lead by example. Consistent with that intent, it follows that the public sector should generally be treated in at least an equivalent manner as the private sector in terms of development requirements. In the case of streets, leading by example clearly includes implementing Complete Streets principles including street trees. Pursuant to Complete Streets principles, this proposal would require street trees in association with new subdivisions of land for private development. Street trees are already often required with development of property and buildings.</li> <li>• Staff note that the Environmental Services and Public Works Departments have initiated an update to Title 9 which provides direction on trees in public rights-of-way. There will be an opportunity through that effort to revisit the Landscaping Code to ensure consistency and to revisit the policy issues.</li> </ul>

<p>If utilities providers are required to meet street tree requirements, the following comments apply:</p> <ol style="list-style-type: none"> <li>1. Avoid conflicts with infrastructure and utilities.</li> <li>2. Clarify thresholds for when requirements apply.</li> <li>3. Planting and maintenance of trees would have staffing and cost impacts.</li> <li>4. What this really means for utilities doing work in the right of way.</li> </ol>	<p>Payne, Guthrie, Prussen</p>	<ol style="list-style-type: none"> <li>1. Comments noted. While space is limited within rights-of-way, the proposal seeks to avoid or minimize landscaping and infrastructure conflicts by requiring adequate space and conditions based on tree size and species, and by requiring specific separations from utilities and infrastructure. Staff note the recommendation to increase the separation requirement from utilities to 10 feet. However, this could greatly limit the area available for tree plantings. Similarly, it is staff's understanding that large trees can be appropriate within the right-of-way when the requirements are met. Therefore, no changes are recommended at this time.</li> <li>2. Comments noted. Staff concur that the following language provides a more functional threshold and recommend that the following replace the current draft language in Section 13.06.502.B.2.b (page 18/340). Street trees are required when: <ul style="list-style-type: none"> <li><u>b. Constructing new permanent roadways, excluding residential Local Improvement Districts; alterations to the width of existing permanent roadways; constructing new sidewalk; replacing more than 50% of an existing sidewalk along a site's frontage (when 50 linear feet or more is being constructed). In the case of sidewalk replacement, street trees shall be required proportionate to the linear footage of sidewalks replaced.</u></li> </ul> <p><i>In addition , include the following definition in Section 3.06.700.P:</i></p> <ul style="list-style-type: none"> <li><u>Permanent Roadway. Roadway constructed with a designed full depth subgrade and road surface section with an established curb and gutter alignment.</u></li> </ul> </li> <li>3. Comments noted. It is clear that planting, maintaining through establishment and replacing street trees will have staffing and cost implications. While some utilities providers do not currently do this type of work, others do. This may lead to a discussion about collaborating to meet the planting and/or maintenance requirements. Similarly, staff recognize that interfacing with property owners also takes resources. The City's Urban Forestry Program is one resource to support those efforts.</li> <li>4. In summary, street trees would be required for full new permanent roadways and substantial sidewalk segments, not for maintenance, partial roadway improvements or other utility projects. Utility providers would, over time, see some increases in staffing and funding dedicated to street trees. However, collaboration with other agencies may help, and the flexibilities of the proposed Landscaping Code may also provide solutions to specific challenges.</li> </ol>
<ul style="list-style-type: none"> <li>• No concerns.</li> </ul>	<p>Hedman</p>	<ul style="list-style-type: none"> <li>• Noted.</li> </ul>

<p>MPT provided comments on the following issues:</p> <ol style="list-style-type: none"> <li>1. Plant material selection – natives, climate-adapted, invasive species, avoid utility conflicts</li> <li>2. Tree variety – must be achieved on a city-wide scale</li> <li>3. Credits and flexibility – Tree Retention</li> </ol>	<p>Fraser, Sutalo</p>	<ol style="list-style-type: none"> <li>1. Comments noted. Requiring climate-adapted species simply means it is more likely that plants will survive. The definition of noxious weeds is included in the Definitions section. Staff concur that a future update of Title 9 is necessary to make the two sections consistent. Staff concur that proposed TMC 13.06.502.C.2 Plant Material Selection, e. Trees (2) should be updated to ...<b>varieties that do not exceed 25 feet in height at 25 years of age</b> (page 20/342). Staff will develop a Climate-adapted definition and provide it at the next Commission meeting.</li> <li>2. Comments noted. MPT raises excellent points in regards to the advantages of achieving variety on a city-wide scale. However, city-scale approaches require advance planning (called for in the Urban Forest Policy Element but not yet completed) and City resources. Furthermore, in staff's view there are still significant benefits to be achieved from tree species diversity at the site level. These include reduced risk from disease, habitat health, and (in some cases) aesthetic benefits.  Staff recognize that boulevards planted all in a single species are often highly regarded. However, a large development site planted entirely with a single species has not been cited as an example of attractive landscaping. The tree variety requirement is already in the code and has not generated concerns from the development community. Furthermore, we understand that the aesthetic feeling of a majestic boulevard with consistent trees can be achieved with multiple species. Finally, flexibility options in the proposed code allow for streetscape, area-specific or self-managed agency plans to depart from the General Standards so long as the overall intent is met.</li> <li>3. Staff concur and recommend the following change to TMC 13.06.502.D.2 Tree Retention: Remove the minimum 6 inch size requirement for tree retention credit and allow trees of the same size for equal credits (page 22/344).</li> </ol>
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<p>4. Credits and flexibility – Self-managed Agencies</p>	<p>Fraser, Sutalo</p>	<p>4. Comments noted. Staff met with MPT to discuss the provisions of the Self-managed Agency section. We understand that MPT wishes this tool to be a major incentive for public agencies to engage in urban forest planning, and one with as straight forward process as possible. Staff developed the following refinements to the draft based on MPT’s input (page 22/344):</p> <p>TMC 13.06.502.D.6. Self-managed Agencies. An optional process for additional flexibility is available for public agencies with urban forestry programs and plans. This option is intended to encourage public agencies to take a leadership role in implementing urban forestry goals and policies. This flexibility can facilitate more intensive development of a particular development site, while meeting the urban forestry policies of the Comprehensive Plan and the intent of the landscaping code by planting the required landscaping at another site in the agency’s permanent control.</p> <p>a. To initiate this optional process, public agencies must submit a request to PDS to be designated as a self-managed agency, including the agency’s urban forestry plan, an overview of its urban forestry program, and an analysis demonstrating general consistency with the <del>Urban Forest Policy Element of the Comprehensive Plan and landscaping code. The request must designate the areas where required landscaping would be planted.</del> The general landscaping requirements of this section apply. Plantings already required by a separate regulatory authority may not count toward meeting the requirements of this section. Upon review, the Director will issue a Determination regarding the consistency of the request with the Comprehensive Plan and code intent. If approved, the Determination shall grant self-managed agency status for up to <del>five</del> ten years, subject to reevaluation. The Director reserves the right to withdraw the self-managed agency status should the intent not be met.</p> <p>b. Self-managed agencies may choose to plant landscaping required as part of a particular development proposal in <del>a another</del> location <del>specified in per</del> their urban forestry plan. This flexibility can be utilized at the agency’s discretion on subsequent site-specific development proposals. Each request to utilize this process as part of a development proposal review shall make reference to the approved Determination, be supported by running totals of landscaping planted in this manner, and include status updates on ongoing health of such landscaping.</p> <p>c. Landscaping Buffers, when required, must be provided on the development site and cannot be shifted to another site. In addition, to the extent feasible, some portion of required street trees and parking lot landscaping shall be planted at the development site, or if shifted from the development site shall be planted in proximity to impervious surfaces, in order to achieve commensurate stormwater benefits.</p>
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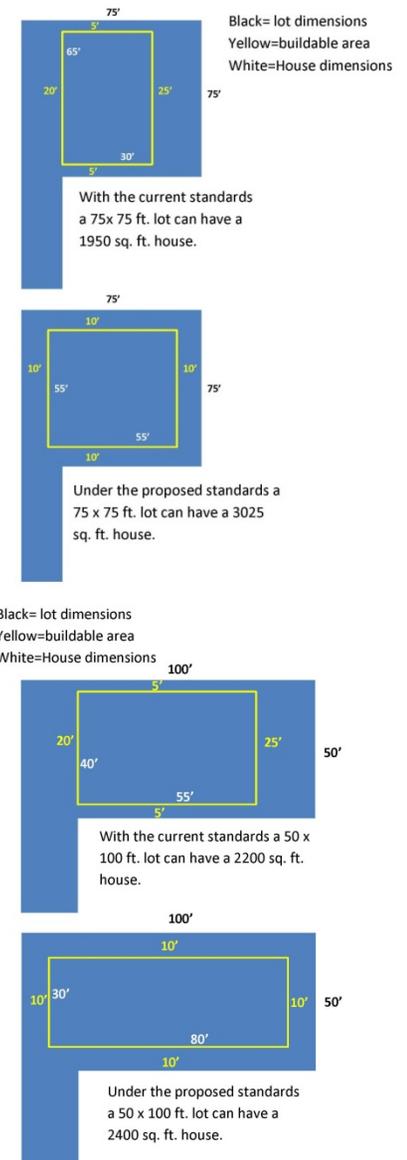
<p>5. Overall site planting – required number too high for tree growth</p> <p>6. Buffers – required number too high for tree growth</p>	<p>Fraser, Sutalo</p>	<p>5. Comments noted. Staff note that in an urban environment, trees tend not to live as long and therefore reach their full potential size. The proposed number of trees required (one Small Tree per 200 sf, one Medium Tree per 300 sf, and one Large tree per 400 sf) was established using the current requirement of one tree per 300 sf as the starting point. Thus, the proposal does not necessarily increase the required number of trees. In addition, staff note that trees required according to these ratios may overhang parking lots or other areas.</p> <p>However, staff note that the Overall Site Requirement may prove challenging to park and open space sites under the proposal since parks are often planted with grass and trees (rather than shrubs) to increase visibility and accessibility. Therefore staff recommend exempting Park and Open Space uses from the Overall Site Landscaping requirement (page 23/345).</p> <p>6. Comments noted. There is a balance to be struck between short-term visual screening and long-term growth potential. In the case of the Buffer requirement, screening is explicitly the primary intent. Therefore, the requirements are calibrated to maximize short-term screening.</p> <p>That being said, staff recognize that the proscriptive standards of this section could limit plant selection and design options. Therefore, staff recommend that an additional option be added to the buffers section (TMC 13.06.502.E (page 25/347) allowing alternative planting plans that meet the intent of providing a substantial vegetated buffer (for the Commission’s consideration – 50% within 5 years and 80% at full maturity).</p>
<ul style="list-style-type: none"> <li>Clarify exemptions in the Landscaping requirements table.</li> </ul>	<p>PDS Staff</p>	<ul style="list-style-type: none"> <li>Staff recommend the following changes: TMC 13.06.502.E – Exemptions: (1) Single, two and three-family developments, unless in association with a full plat <u>or a short plat with 5-9 lots</u>, are exempt from all landscaping requirements (page 23/345).</li> </ul>

**9. Plan and Code Cleanup** (Application #2014-011)

- Concern over the proposed setback requirements for pipestem lots as it could limit the size of buildings which would inhibit development and counteract the Growth Management Act.
- Mr. Lafranica also objected to the proposed height restriction for pipe stem lots which would restrict the height of homes built to 25 feet or no more than the average height of the dwellings on each abutting property line.

Lafranica

- Staff’s analysis has shown that the proposed setback requirement 10 feet on all sides in all districts with the exception of 15 feet in the R-1 District will, in most cases, result in a narrower building footprint but will not result in a reduction of building area and will often result in a larger building footprint. The smallest footprint a home could have on a newly created pipe stem lot would be 30 feet by 100 feet on a 50 x 100 foot lot (the narrowest lot width allowed). See below for illustrations of how building footprints on pipestem lots would change through the proposed regulation. The intent of the setback regulation is to provide additional buffering for adjacent properties due to the varied building orientation of buildings on pipe stem lots and proximity to other existing development. An example of this is where a side lot line abuts a rear or side lot of the adjacent lot.
- The proposed language regarding the height limitation of buildings on pipe stem lots to 25 feet or no more than the average height of the dwellings on each abutting property is to address neighborhood cohesiveness and character. The proposed regulation will allow new buildings on pipe stem lots the same rights as abutting property owners while ensuring new buildings are in-line with the existing character of the neighborhood.



**Determination of Environmental Nonsignificance and SEPA Checklist (SEP2014-40000218532)**

<p>The Health Department has no objections to the proposal as presented.</p>	<p>Harp</p>	<p>Comment noted.</p>
<p>The Department of Ecology recognizes this is a non-project action and recommends that:</p> <ul style="list-style-type: none"> <li>• Developers or city planners contact Ecology to determine if the property or facilitates planned for development have known or suspected environmental contamination;</li> <li>• Consider adopting future policies related to the Tacoma Smelter Plume; and</li> <li>• Include the Ecology's procedures and guidelines associated with the Model Toxics Control Act as conditions of approval.</li> </ul>	<p>Ecology</p>	<ul style="list-style-type: none"> <li>• The City does contact the Ecology through such venues as the pre-application process and the SEPA comment periods, and keeps track of the consent decree or agreed order under the Model Toxics Control Act in association with the individual projects.</li> <li>• The Environmental Policy Element of the Comprehensive Plan contains policies speaking to the prevention of contamination and cleanup of identified contaminated sites through partnership with the Ecology to improve the quality of Tacoma's environment. Such policies include E-ER-1 Comprehensive Cleanup Strategies, E-ER-2 Contaminated Sites, E-FW-23 Superfund Cleanups, and E-ER-7 Intergovernmental Partnerships. The City may consider adding future policies addressing specific sites.</li> <li>• The conditions from the Ecology are dependent on the specific project. The City is in the process of discussing with the Ecology about how and when to require soil testing and work under the Model Toxics Control Act for compliance with the contaminant cleanup standards.</li> </ul>

## Appendices:

### A. List of Commenters

Oral Testimony Received at the Public Hearing on March 19, 2014 (listed in order of testifying)		Subjects of Comments
1. Milt Tremblay, University of Washington Tacoma		Sustainability Code
2. Jeremiah Lafranca, Master Builders Association		Sustainability Code; Plan and Code Cleanup
3. Jennifer Chin		Sustainability Code
4. Katherine Sutalo, Metro Parks Tacoma		Open Space Element; Urban Forestry
5. Curtis Hancock, Metro Parks Tacoma		Point Defiance
6. Jennifer Halverson Kuehn, Bicycle and Pedestrian Technical Advisory Group		Sustainability Code
7. Kell McAboy, Port of Tacoma		Container Port Element
8. Christine Phillips, BCRA		Point Defiance
9. Kris Symer, Bicycle and Pedestrian Technical Advisory Group		Sustainability Code
10. J. J. McCament, Point Ruston		Point Ruston
Written Comments Received by March 21, 2014 (listed by last names in alphabetic order)		Subjects of Comments
1. Reggie Brown <sup>(1)</sup>	March 7, 2014	Affordable Housing
2. Reggie Brown <sup>(2)</sup>	March 7, 2014	Affordable Housing
3. Patrick Clark, University of Washington Tacoma	March 21, 2014	Sustainability Code
4. Loren Cohen, Point Ruston	March 19, 2014	Point Ruston
5. Phil Coughlan and Nick Cutting, Sustainability Tacoma Commission	March 11, 2014	Open Space; Sustainability Code; Urban Forestry
6. Department of Ecology – Southwest Regional Office	March 21, 2014	SEPA Checklist
7. Doug Fraser <sup>(1)</sup> , Metro Parks Tacoma	March 21, 2014	Open Space
8. Doug Fraser <sup>(2)</sup> , Metro Parks Tacoma	March 21, 2014	Urban Forestry
9. Mark Guthrie, Tacoma Public Utilities - Water	February 27, 2014	Urban Forestry
10. Scott Hansen, Puget Creek Restoration Society	March 21, 2014	Open Space; Sustainability Code; Urban Forestry
11. Brad Harp, Tacoma-Pierce County Health Department	March 11, 2014	SEPA Checklist
12. Marcie Hedman, Tacoma Public Utilities - Power	March 11, 2014	Urban Forestry
13. Ken Kingsbury, West End Neighborhood Council	November 18, 2013	Point Ruston
14. Jeremiah Lafranca <sup>(1)</sup> , Master Builders Association	March 14, 2014	Sustainability Code
15. Jeremiah Lafranca <sup>(2)</sup> , Master Builders Association	March 18, 2014	Plan and Code Cleanup
16. Jeff Payne, Puget Sound Energy	March 21, 2014	Urban Forestry
17. Gary Pedersen and Michael Mirra, Affordable Housing Policy Advisory Group	March 20, 2014	Point Ruston; Affordable Housing
18. Kari Prussen, Environmental Services Department	March 21, 2014	Urban Forestry
19. Ken Rody	March 11, 2014	Affordable Housing
20. Leslie Ann Rose, Citizens for a Healthy Bay	December 3, 2013	Point Ruston
21. Katherine Sutalo, Metro Parks Tacoma	March 3, 2014	Open Space
22. Kris Symer, Bicycle and Pedestrian Technical Advisory Group	March 21, 2014	Sustainability Code
23. Rob White, City of Ruston	March 21, 2014	Point Ruston

### B. Summary of Oral Testimony Received at the Public Hearing on March 19, 2014

### C. Written Comments Received during the Comment Period through March 21, 2014



**Summary of Oral Testimony  
Received at Planning Commission Public Hearing  
March 19, 2014**

**(1) Milt Tremblay, University of Washington Tacoma:**

Mr. Tremblay thanked the Commission and staff for working with the University through the annual amendment process. He stated that for the most part the changes proposed are positive and the University supports and even wants to go above and beyond the requirements. He suggested that the City continue to look at the University as a campus; for example, regarding the bicycle parking and electric vehicle parking, not every building on the campus may need to meet these requirements, if the requirements are already met at a neighboring building.

**(2) Jeremiah Lafranca, Master Builders Association (MBA):**

Mr. Lafranca thanked the Commission and staff for working on the amendments and for keeping the MBA and the Affordable Housing Policy Advisory Group involved in the process. Regarding the application of "Sustainability Code Amendment", Mr. Lafranca pointed out that the electric vehicle parking requirements for multi-family housing may become a logistical issue if the spots are installed before the residents move in, which may cause additional cost later if they need to be moved, and that electric vehicles should not be government regulated, but an incentive-based program, as the future of electric vehicles is uncertain with other new energy-efficient vehicles emerging. Regarding the application of "Plan and Code Cleanup", Mr. Lafranca was concerned that the proposed setback requirements for pipestem lots would limit the size of buildings which would inhibit development and counteract the Growth Management Act.

**(3) Jennifer Chin:**

Ms. Chin expressed her desire for more car-sharing opportunity in Tacoma, as well as much more bicycle parking.

**(4) Katherine Sutalo, Metro Parks Tacoma (MPT):**

Ms. Sutalo expressed appreciation to staff for collaborating with MPT and other agencies to work on the Open Space Habitat and Recreation Element and the Urban Forestry Landscaping Code Update. She stated that MPT is concerned that the Overall Site Landscaping Requirements would not leave the trees enough space to grow; that the Plant Materials Selection would not achieve the intent and would actually foster less diversity of trees; and that tree diversity would best be addressed City-wide and not lot-by-lot. She also commented that the Self-Managed Agency provisions that MPT worked with the City to create in January are not reflected in the final proposal and that the current language calls for more detailed oversight of agencies by the City. MPT looks forward to working with City Staff to create a version of the Self-Managed Agencies provisions that better reflect the cooperative relationship that MPT has with the City and other agencies.

**(5) Curtis Hancock, MPT:**

Mr. Hancock spoke in favor of the Point Defiance Park Land Use Policies. He pointed out that Point Defiance is an obvious destination in itself and that the Development Regulation Agreement (DRA) is an excellent vehicle to facilitate the continued development of the park, rather than using piecemeal conditional use permits.

**(6) Jennifer Halverson Kuehn, Bicycle and Pedestrian Technical Advisory Group (BPTAG):**

Ms. Kuehn expressed BPTAG's support to the Sustainability Code Amendment, particularly bicycle parking related provisions. BPTAG applauds the City in their effort to recognize and encourage transportation modes that have the least environmental impact. BPTAG believes that adopting these policies will advance the vision of the Mobility Master Plan and create a healthier living environment for the residents of the City.

(7) **Kell McAboy, Port of Tacoma:**

Ms. McAboy expressed the Port of Tacoma's support for the new Container Port Element and thanked City staff for collaborating with the Port in developing the element.

(8) **Christine Phillips, BCRA:**

Ms. Phillips pointed out that BCRA has been working with MPT and the City on the proposed amendments associated with the application of "Point Defiance Park Land Use Policies" and setting the foundation for the Development Regulation Agreement, which is a big-picture plan that includes indication for environmental mitigations and covers all aspects of major development of the Point Defiance Park for the next 20 years.

(9) **Kris Symer, BPTAG:**

Ms. Seymour commented that BPTAG would like to see an enhancement in bicycle parking within public spaces, and make sure this is happening even when no new or significant infrastructure is occurring.

(10) **J. J. McCament, Point Ruston:**

Ms. McCament thanked the Commissioners and staff for visiting Point Ruston in December 2013. She provided a follow-up on the issues raised in December relating to transit and affordable housing. Regarding transit, Point Ruston has started construction on Building 1A, which will provide ample parking for cars, bicycles, motorcycles, along with the recruitment of a company that would rent and/or sell bicycles for people to use along the Waterwalk. Point Ruston is also preparing a response to Pierce Transit's Long-Range Plan 2040, indicating that the LID improvements on Ruston Way include bus stops. Regarding affordable housing, Point Ruston has discussed with the Tacoma Housing Authority on ways to provide affordable housing for those earning less than 80% of Average Median Income. Point Ruston has also done research about regional micro-apartments, analyzed current rents at Point Ruston in context of the 2014 Affordable Housing Availability and Income Limits, looked at competitive properties that are using the multifamily tax-exemption, and drafted an informal survey to gain information regarding the local acceptance of micro-apartments.

**From:** [Reggie Brown](#)  
**To:** [Barnett, Elliott](#)  
**Subject:** RE: Small Lot Development  
**Date:** Friday, March 07, 2014 4:12:56 PM

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Hey Elliot,

This is a great idea. It will have a great impact on small lot development. There are several properties that I would like to purchase right now that fit this criteria. How soon can it go into affect if adopted? Would they consider some test examples?

Thanks

Reggie

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**From:** Barnett, Elliott [<mailto:elliott.barnett@ci.tacoma.wa.us>]  
**Sent:** Friday, February 14, 2014 1:23 PM  
**To:** Reggie Brown  
**Subject:** RE: Small Lot Development

Hi Reggie, my pleasure I thought you would be interested!

Here's the most recent packet. The official version will be released next Wednesday, but I don't anticipate any changes to this version. It will be out for public review from now until March 21<sup>st</sup> and I'd welcome any questions, comments or suggestions. Let us know if you think this is a good idea. The small lot items are in there with several other issues.

All the best,  
Elliott

**Elliott Barnett**  
**Associate Planner**  
**City of Tacoma**  
**747 Market Street, Room 345**  
**Tacoma, WA 98407**  
**(253) 591-5389**

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**From:** Reggie Brown [<mailto:reggiebrown74@comcast.net>]  
**Sent:** Friday, February 14, 2014 1:19 PM  
**To:** Barnett, Elliott  
**Subject:** Small Lot Development

Hey Elliot,  
Thanks for the info.  
Reggie

**From:** [Reggie Brown](#)  
**To:** [Barnett, Elliott](#)  
**Subject:** RE: Small Lot Development  
**Date:** Friday, March 07, 2014 4:19:42 PM

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One more thing Elliot. How will roof lines be handled. The roof line options become somewhat limiting with 25ft wide home. Gable roof north south or a hip roof north south.

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**From:** Barnett, Elliott [mailto:[elliott.barnett@ci.tacoma.wa.us](mailto:elliott.barnett@ci.tacoma.wa.us)]  
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All the best,  
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**From:** Reggie Brown [mailto:[reggiebrown74@comcast.net](mailto:reggiebrown74@comcast.net)]  
**Sent:** Friday, February 14, 2014 1:19 PM  
**To:** Barnett, Elliott  
**Subject:** Small Lot Development

Hey Elliot,  
Thanks for the info.  
Reggie



March 21, 2014

To: City of Tacoma Planning Commission

From: Pat Clark

RE: 2014 Code Revisions

As mentioned at Wednesday night's Planning Commission hearing, the University of Washington Tacoma will continue to partner with the City of Tacoma in supporting citizen's access and ability to utilize alternative forms of transportation, as well as provide landscaping that enables a sustainable environment.

In the spirit of partnership we request the following measures be codified in a way that is both measured and reasonable. Here are a few bullet points for your consideration:

1. **VIEW UWT AS A CAMPUS** - The Downtown Area-wide Subarea Plan is a strong example of how to support the growing and diverse needs of a campus. UWT, because of its size, complexity and continual growth does not have the fiscal and physical flexibility to incorporate every site specific upgrade, on a building-by-building level. We do, however, have the ability and desire to comply with required and aspirational improvements within the campus footprint.
2. **PROVIDE FOR INCREMENTAL DEVELOPMENT** - Many of the tables provided in the proposed code updates are more aspirational than practical in terms of required quantities. This is particularly true for the number of E/V charging stations, bike racks and street trees. As a minor tenant improvement does not trigger a full building upgrade, a new building on our campus should not require the total number of required elements that are identified for an entire campus. We commit to provide these elements as they become needed, but installing specified numbers, campus-wide, that are currently listed is not only fiscally impractical, but it could severely impact our ability to provide for other programmatic needs, thus our ability to serve students.
3. **Allow for Physical Realities in Requirements**- As you are well aware, our campus, like much of Tacoma, is built on a hillside. The total elevation change between Pacific Avenue and Tacoma Way, within our campus footprint, is 160 feet (The equivalent of 16 stories). Due to this significant grade change, many of our parking lots have a cross-slope that makes it extremely difficult to site a compliant ADA parking spot within that particular lot's footprint. In treating UWT as a campus, we have been able to accommodate the needs of individuals with disabilities, by aggregating our ADA parking on those lots that meet the slope and grade requirements. This could impact our ability when developing ADA accessible or "capable" Electric Vehicle ("EV") parking spaces in the future.

On behalf of the University of Washington Tacoma, we thank you for the opportunity to provide feedback that enables the City of Tacoma in developing sensible codes and regulations. If you have any questions, please contact Milt Tremblay at (253) 692-4754 or at [milt@uw.edu](mailto:milt@uw.edu).

Sincerely,

PATRICK D. CLARK, RPA, CCIM  
Director Campus Planning & Real Estate  
University of Washington-Tacoma

Box 358431 1900 Commerce Street Tacoma, WA 98402

tel 253.692.5660 fax 253.692.5661 <http://www.tacoma.uw.edu/finance-administration/division-finance-administration>



March 19, 2014

TO: Chair Sean Gaffney, Tacoma Planning Commission  
FROM: Loren Cohen, Point Ruston  
RE: Point Ruston MUC Application – Public Hearing

First, thank you to the Tacoma Planning Commission for making the time to tour Point Ruston last December; it was our pleasure to host the group and we never turn down an opportunity to show folks what we've been doing to redevelop the former Asarco site into a vibrant urban neighborhood.

The December 18 memo we provided to the Commission provided specific information regarding our efforts to address transit and affordable housing at Point Ruston. The following brief summary will update you on our continuing efforts.

#### Transit

- Construction began in January 2014 on Building 1A, which includes a 9-screen Century Theatre, 10,000 sq. ft. of ground floor retail, 138 residences and 275 parking stalls. Ample on-site parking / storage for bicycles, motorcycles, and vanpools continues to be a priority, along with the recruitment of a bicycle shop that would sell and rent bikes for those wishing to cycle the Waterwalk, and points beyond.
- Pierce Transit's Long Range 2040 Plan year-long planning process was kicked off in February, and Point Ruston is preparing a response to Pierce Transit's request for stakeholder input. As transit funding is restored and expanded in the future, Point Ruston's recent transit improvements built on Ruston Way as part of the Point Ruston LID are in place and ready for use.

#### Affordable Housing

Since our meeting with the Commission in December, Point Ruston has:

- Met with the Tacoma Housing Authority to discuss working together to provide affordable housing for those earning less than 80% of Area Median Income (AMI). Representatives from Point Ruston and THA are following up to identify opportunities, stumbling blocks, and process.
- Gathered information regarding regional micro-apartment developments including a tour of Via 6, a new high-density mixed use building in downtown Seattle with studio apartments as small as 465 sq. ft. and on-site amenities including restaurants, a bicycle shop, and Zipcar availability.
- Analyzed current rents at Point Ruston within the framework of 2014 HUD guidelines for affordable housing published by the City's Housing Office and reviewed market rents for competitive properties currently utilizing the City's MFTE program.
- Drafted an informal market survey that can be used to gather feedback regarding local acceptance of alternative residential units such as micro-apartments and mini-flats.

In closing, Point Ruston continues to embrace economic diversity and remains highly motivated to include affordable housing as a residential market segment within the Asarco redevelopment.

Sincerely,

Loren Cohen



**December 18, 2013**

TO: Chair Sean Gaffney, Tacoma Planning Commission

FROM: Loren Cohen

RE: Point Ruston MUC Application  
Follow-Up: Affordable Housing & Transit

The following summary is in response to information requested by Planning Commission members at their November 6, 2013 meeting regarding provisions for transit services and affordable housing at Point Ruston.

Transit

- In response to Pierce Transit's comments during the Point Ruston FSEIS process, and in conjunction with LID improvements, Point Ruston built a 10' multi-modal trail (pedestrians / bicycles) as well as bus pads on both sides of the Ruston Way frontage. Bus shelters, signage, and any other necessary modifications will be constructed when transit funding allows service to begin.
- Bicycle parking is included in the streetscape standards for Point Ruston, and the initial construction of the Point Ruston Waterwalk provides a multi-modal path for pedestrians, cyclists, skateboarders, etc. with several bike racks installed and more planned as the Waterwalk is finalized over time.
- Bicycle storage for employees and residents will be a component in individual buildings as well. For instance, a bicycle storage area accommodating approximately 30 bicycles was built in the Copperline parking garage to serve both residents and employees living and/or working within the mixed-use building. The Copperline's bicycle storage is proving to be an important and well-used amenity.
- Point Ruston is purchasing several bicycles that will be loaned out to visitors visiting the property. On a much larger scale, Point Ruston is interested in participating in a bike loaner program that the City has been exploring for possible implementation to serve a much larger geographic area for those wishing to ride a bicycle from one destination to another but not interested or able to own a personal bicycle.
- Prior to bus transit service, we are interested in recruiting a bicycle rental facility, identifying new approaches to bike storage for employees and residents, working on a zip car program when demand warrants, working with future employers at Point Ruston to implement a Commute Trip Reduction program, and we have expressed our willingness to explore the possibility of being a terminal for water taxi services should that eventuate in our community.

## Affordable Housing

Point Ruston is highly motivated to include affordable housing as a residential market segment within its waterfront development. We are dedicated to exploring affordable housing options to see what is realistic and feasible within the framework of the financial obligations incurred when building on a remediated site, and to better understand the impact and benefit of the multi-family tax exemption program available in Tacoma's Mixed Use Centers.

Affordable housing research activities over the next two months:

1. Explore alternate residential products such as such as micro-apartments, mini-flats, aPodments, 'foldable' apartments (for instance, the kitchen table folds up into the bed that folds up into the wall), etc.
2. Visit existing alternate residential developments in our region to better understand construction costs and marketability (Seattle examples: Footprint Wallingford; 1300 University, and, 1715 NW 58<sup>th</sup> Street)
3. Conduct informal market survey to determine acceptance of alternative residential units.
4. Price out construction costs and complete pro formas, including estimated benefit of multi-family tax exemption, for selected residential products.
5. Schedule meetings with affordable housing providers such as Tacoma Housing Authority, Mercy Housing, etc. to explore potential partnerships. Discussions to include the possibility of an affordable housing provider owning and managing affordable units at Point Ruston; understanding the elements of a public / private partnership; discussing how an agreement might be structured; potential funding sources; management and maintenance responsibilities; construction standards, schedule, etc.

We anticipate completing our research and being able to make an informed commitment to affordable housing at Point Ruston prior to the public hearings for the 2014 City's Comp Plan Amendments tentatively scheduled for February-March 2014.

## Summary

It is important to reiterate our reasons for seeking the MUC designation for Point Ruston, and to once again articulate the difference for this developing neighborhood with and without the MUC designation.

- The City of Tacoma drives economic development and job creation to the Mixed-Use Centers and Point Ruston's master development plan, completed environmental review and land use approvals make it a competitive property for local and regional economic development recruitment efforts.
- MUC's are priority areas for future transportation improvements, transit services, and utility infrastructure improvements.
- MUC designation promotes higher residential densities and the City's Multi-Family Tax Exemption program strengthens affordability and accelerated development of residential housing for residents in more diverse economic segments.

- Accelerated residential and employment development will bring multi-modal transit services sooner.
- The transition from a heavy industrial use to a mixed-use community is 30 years in the making; accelerated development brings properties back on the tax rolls sooner than later.

In short, the MUC designation will make a positive difference with measureable benefits not only for the proposed Point Ruston MUC but for the entire community as well.

Sincerely,



Loren Cohen



City of Tacoma  
Sustainable Tacoma Commission

March 11, 2014

Tacoma Planning Commission

RE: 2014 ANNUAL UPDATES AND AMENDMENTS  
Open Space Element Update, Sustainability Code Amendment and Urban Forestry Landscaping Code Update

The Sustainable Tacoma Commission expresses its support for the following updates and amendments of various environmental policies in the hopes of developing a more efficient, beautiful, and environmentally-friendly city.

### **Open Space Element Update**

- Updates to the following sections: Open Space Definition; Open Space System; Vision; Community Gardens; Waterfront Open Spaces and Shoreline Access; Habitat Areas; Strategic Action Program; Partnerships; Acquisition and Management of Land and Facilities; and Implementation
- New section titled *Plans for Specific Areas*
- Refine Open Space Projects and Open Space Inventories lists and incorporate them into the Element

### **Sustainability Code Amendment**

- Electric vehicle parking and infrastructure provision—includes design and location standards and accessibility and parking quantity requirements
- Bicycle start and end of trip infrastructure—includes the separation of auto and bicycle parking requirements, the distinction between short- and long-term bicycle parking, and the creation of shower and changing facilities at long-term bicycle parking sites
- Setback and height exception for exterior insulation
- Low-impact development barriers

### **Urban Forestry Landscaping Code Update**

- Increase quality and quantity of planted trees and other vegetation
- Optimize health, survival, and maintenance of trees
- Incentives and flexibility to better connect the desires of site and city
- Provide an understandable and predictable approach to the landscaping code

Thank you for considering these important changes. All of our efforts will lead us towards reduced greenhouse gas emissions and a more livable, healthy community.

Sincerely,

Handwritten signature of Philip C. Coughlan in blue ink.Handwritten signature of Nick Cutting in blue ink.

Phil Coughlan

Nick Cutting

Co-Chairs

Sustainable Tacoma Commission



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

March 21, 2014

Mr. Lihuang Wung  
City of Tacoma  
Planning & Development Services  
747 Market Street, Room 345  
Tacoma, WA 98402

Dear Mr. Wung:

Thank you for the opportunity to comment on the determination of nonsignificance for the Comprehensive Plan and Land Use Regulatory Code Amendments for 2014 proposal (SEP2014-40000218532). The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

**TOXICS CLEANUP: Marv Coleman (360) 407-6259**

If development of property or facilities is planned for property that has known or suspected environmental contamination, it must be reported to Ecology's Environmental Report Tracking System by calling (360) 407-6300. Prior to development of property, it is highly recommended that the developer or city planners contact Ecology to determine if the property is listed on Ecology's databases. For assistance and information about determining if a property has environmental issues, contact Marv Coleman at the phone number given above or email at [mcol461@ecy.wa.gov](mailto:mcol461@ecy.wa.gov).

**TOXICS CLEANUP/TACOMA SMELTER PLUEM: Elizabeth Weldin (360) 407-7095**

Ecology recognizes this is a non-project action.

The City of Tacoma is located in an area that may have been contaminated with heavy metals due to the air emissions originating from the old Asarco Smelter in north Tacoma (visit Ecology's Tacoma Smelter Plume map search tool: <https://fortress.wa.gov/ecy/smeltersearch/>).

Soil contamination from the former Asarco smelter poses a risk to human health and the environment. Children are at especially high risk from direct exposure to contaminated soil. Construction workers, landscapers, gardeners, and others who work in the soils are also at risk.

Ecology recommends that the City of Tacoma consider adopting future policies related the Tacoma Smelter Plume.

Ecology recommends that the City of Tacoma include the following as conditions of approval:

- Sample the soil and analyze for arsenic and lead. The applicant shall contact Elizabeth Weldin with the Southwest Regional Office (SWRO), Toxics Cleanup Program at the phone number given above or via email at [ewel461@ecy.wa.gov](mailto:ewel461@ecy.wa.gov) for guidance about soil sampling within Tacoma Smelter Plume. The soil sampling results shall be sent to the City of Tacoma and Ecology for review.
- If lead or arsenic are found at concentrations above the Model Toxics Control Act (MTCA) cleanup levels (Chapter 173-340 WAC); the owners, potential buyers, construction workers, and others shall be notified of their occurrence. The applicant shall also contact the Environmental Report Tracking System Coordinator at the Ecology SWRO at (360) 407-6300. The MTCA cleanup level for arsenic is 20 ppm and lead is 250 ppm.
- If lead, arsenic and/or other contaminants are found at concentrations above MTCA cleanup levels, the applicant shall:
  - 1) Enter into the Voluntary Cleanup Program with - Ecology prior to issuance of any site development permits for this proposal and/or the initiation of any grading, filling, or clearing activities. For more information on the Voluntary Cleanup Program, visit Ecology's website at: <http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm>.
  - 2) Obtain an opinion letter from Ecology stating that the proposed soil remediation will likely result in no further action under - MTCA prior to the issuance of any site development permit and/or the initiation of any grading, filling, or clearing activities. The issued site development permit plans shall be consistent with the plans reviewed and deemed consistent with MTCA by Ecology. The applicant shall provide to the City of Tacoma the opinion letter from Ecology.
  - 3) Prior to finalizing site development permits, provide to the City of Tacoma "No Further Action" determination from Ecology indicating that the remediation plans were successfully implemented under MTCA.

If Ecology determines this project should not be part of the Voluntary Cleanup Program, Ecology will contact the City of Tacoma and discuss possible options.

- If soils are found to be contaminated with arsenic, lead, or other contaminants, extra precautions shall be taken to avoid escaping dust, soil erosion, and water pollution during grading and site construction. Site design shall include protective measures to isolate or remove contaminated soils from public spaces, yards, and children's play areas. Contaminated soils generated during site construction shall be managed and disposed of in accordance with state and local regulations, including the Solid Waste Handling Standards regulation (Chapter 173-350 WAC). For information about soil disposal contact the local health department in the jurisdiction where soils will be placed.

The link below provides a fact sheet that explains more how the arsenic and lead clean-up levels were set and why Ecology sees that they are protective for human health: <https://fortress.wa.gov/ecy/publications/SummaryPages/1109095.html>.

March 21, 2014

Page 3

For assistance and information about Tacoma Smelter Plume and soils contamination, contact Elizabeth Weldin at the phone number given above or via email at [ewel461@ecy.wa.gov](mailto:ewel461@ecy.wa.gov).

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology  
Southwest Regional Office

(SM:14-1045)

cc: Marv Coleman, TCP  
Elizabeth Weldin, TCP

**From:** [Doug Fraser](#)  
**To:** [Huffman, Peter](#)  
**Cc:** [Barnett, Elliott](#); [Joe Brady](#); [Kathy Sutalo](#); [Wayne Williams](#)  
**Subject:** Open Space Habitat and Recreation Element- Comments  
**Date:** Friday, March 21, 2014 5:09:38 PM  
**Attachments:** [image001.jpg](#)

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Dear Peter,

In response to the Planning Commissions public review process, I am forwarding to you our comments on the Open Space Element Update currently being reviewed by the Planning Commission. As with the Landscape Code that I sent earlier, these comments had been shared earlier with your staff but I want to make sure that they are entered into the record for consideration. We appreciated the opportunity to review the draft document as it was being developed and extensive interaction with your staff to update the Open Space and Recreation element of the Comprehensive Plan. Following are the Metro Parks comments that we have discussed with Elliott Barnett.

Open Space System, p. 7: It may make sense to specifically reference TPU and the Port within the Open Space System because of the significant amount of land including open spaces that they own and operate.

OS-GI-1 Green Infrastructure, p. 15 refers to increasing the City's canopy cover by 2028; that should either be changed to 2034 for the 20 years of this plan, or to 2030 to match the Urban Forestry Policy Element. Also, this section calls for existing canopy cover to be analyzed, and it was analyzed, in 2011 – the OSHRE might call for analyzing it on a regular basis, though.

OS-CG-1 Community Gardens, p. 16: This section should mention the MOU between MPT, COT and Pierce County with the Pierce Conservation District that sets up the framework for PCD to manage the Community Gardens Program for the entire County. Perhaps something like this:

Tacoma currently has over 35 community gardens, including 11 on City-owned property. The City partners with Metro Parks and Pierce County to support management of community gardens by the Pierce Conservation District. Gardens are operated by MPT, churches, community groups, schools and other organizations.

OS-HA-11 Habitat Stewardship Outreach and Training, p. 21

The language in this section should recognize that good work is already happening. COT should continue to partner, and continue to inform citizens of the need for stewardship.

Implementation and Funding, pp. 23-24

The Implementation and Funding section should reflect the intent of the upcoming MPT/COT interlocal agreement for open space management. Open Spaces fit into the category of parks and recreation, and MPT is the true provider of these services in the City. The City is beginning to shift

the appropriate properties to MPT ownership and provide the capital to make the management of these properties sustainable.

The OS-PF section needs to recognize the transition of the 452 acres recently to the Environmental Services Division in the City. These properties are “Open Space” and will not be funded with “Open Space Fund” dollars. OS-PF-6 notes the use of Environmental Services funds to manage Open Spaces that serve stormwater functions, but that could be placed within OS-PF-2 that mentions the Open Space and Wetland Mitigation Funds. There should be more discussion about the long term goals for the Environmental Services properties.

OS-CW-2, Transfer of General Government Property, p. 27

OS-CW-2 refers to transferring General Government-owned habitat lands to the Open Space program, but in fact some properties were transferred to Environmental Services. This strategy for preserving and maintaining habitat lands, as well as a strategy for transferring odd parcels and unimproved ROWs adjacent to park land to MPT, should be mentioned here, and possibly in the OS-PF-2 (and 6) and OS-LF-2 (Open Space Inventory) sections as well.

Metro Parks would also like to see some discussion in this section about evaluating adjacent unimproved ROWs and odd parcels in mixed-ownership Open Spaces for transfer to a single agency’s ownership and management.

OS-LF-12 Scenic Views – Private Benefit, p. 29

This section has not been changed from the original OSHRE, but it is more specific/detailed than a policy should be, and we are concerned that it may conflict with what the City wants to achieve with the Stadium-Schuster slope management plan. Consider this alternative:

Removal of public trees for the purposes of retaining or creating private views should not be allowed, but limited tree management may be allowed for this purpose if it is part of a coordinated approach resulting in net habitat enhancement for the area.

OS-LF-13 Scenic Views – Public Benefit, p. 29:

This section should explain where to find the list of existing public views.

Plans for Specific Areas, p. 30:

The second paragraph of this section states, *“Inclusion in this section is intended to convey the City Council’s support for and recognition of the policy direction in these plans, and to convey that they are planning and implementation priorities. Inclusion in this section lends support to applications for City approvals such as Conditional Use Permits, Rezones and Development Regulation Agreements meeting the intent of these plans, as well as the policies of the OSHRE. This section also provides a forum for the Council to refine their policy direction on a given site, in consultation with the Planning Commission and other stakeholders.”*

The section seems like the City is inserting itself into the specifics of other agencies’ plans. The City Council doesn’t really have any purview to provide “policy direction” on any of Metro Park’s plans, beyond those that are included in the City’s TMC.

Plans for Specific Areas. This section (in addition to the comment above) is not complete.

There are many other plans that should be recognized if this is going to be viewed as a conclusive list. What is the purpose of this section?

Measuring and Reporting Progress, p. 32:

Progress Report Card- what is specifically being measured? What are the specific goals, outcomes, and metrics that can be compared and what is the baseline being used for evaluation. (We understand that this is flushed out more in the procedures, but a general overview of the intended result could be good.)

Details:

- Schools go by the name 'Tacoma Public Schools', not the Tacoma School District.
- In Section II – Definitions, why delete the statements that water quality, soil stability, groundwater recharge, and support for fisheries are open space functions worth preserving? Maybe those functions could be incorporated into the remaining definitions?
- Open Space Goals (p9) refers to the Needs Assessment in the Supporting Documents section, but neither thing exists.
- OS-LF-1 still refers to the Strategic Action Program.

Thank again, Peter for this opportunity to review the proposed changes to the Open Space Habitat and Recreation Element. We look forward to working with the City to address these issues. We look forward to working with you on revisions as this moves through the adoption process.

Sincerely,

**Doug Fraser**

**Chief Planning Manager**

Metro Parks Tacoma

4702 S 19th Street

Tacoma, Wa. 98405

Phone: (253) 305-1019

FAX: (253) 305-1098

[dougf@tacomaparks.com](mailto:dougf@tacomaparks.com)



CREATING HEALTHY OPPORTUNITIES TO PLAY, LEARN AND GROW

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**From:** [Doug Fraser](#)  
**To:** [Huffman, Peter](#)  
**Cc:** [Barnett, Elliott](#); [Joe Brady](#); [Kathy Sutalo](#); [Wayne Williams](#)  
**Subject:** MPT comments on COT landscape code update  
**Date:** Friday, March 21, 2014 12:49:54 PM  
**Attachments:** [image001.jpg](#)

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Dear Peter,

The following are comments that Metro Park's has developed in response to the public comment period by the Planning Commission on this code issue. Most of these comments we have shared earlier but we wanted to take this opportunity to provide them for your records. Metro Parks would like to express our appreciation to your staff for their extensive interaction with us and with others to update the City's Landscaping Code. Our staff reviewed this document for technical qualities and for its potential effects on MPT operations and offers these comments.

13.06.502 C 2. Plant Material Selection, b. Native and climate-adapted landscaping. *All required landscaping shall be climate-adapted. The retention and use of natives is encouraged and permitted for any and all landscaping. Invasive species, as identified in the UFM, shall not count toward meeting required plantings. Noxious weeds are prohibited from being planted in required landscaped areas.*

City staff may not be able to assess which plants are climate adapted, since our climate is changing: The USDA and *Sunset* are both having difficulty keeping their climate hardiness maps up to date. Since the code requires plants to be kept alive, plant suitability will be self-regulating.

The blanket approval of native plants conflicts with TMC 9.19 (greatly in need of revision), which outlaws all willows and cottonwoods and the native bigleaf maple.

Noxious weeds should be defined within this code as those on the Pierce County Weed Control Board's list at the time of permit application.

13.06.502 C 2. Plant Material Selection, e. Trees (2) ... *Trees under power lines shall have a maximum mature height not greater than 25 feet.*

'Maximum mature height,' according to the nursery industry which supplies the plant descriptions, is the average height at 10 years. This height may double by 20 years. Trees planted near power lines should be varieties that do not commonly exceed 25 feet in height at 25 years of age.

13.06.502 C 2. Plant Material Selection, e. Trees (3) Tree variety.

The majestic double rows of a single tree variety, such as within Thea's Park and along North 30<sup>th</sup> Street west of Proctor, will never be repeated or expanded in Tacoma if this rule is adopted. Metro Parks agrees that a diversity of tree types is very important, but this code does nothing to increase that diversity: developers could still plant mixtures of the 4 most common species in Tacoma, but a uniform planting of an uncommon tree species would not be allowed. The city of Vancouver BC has long boulevards of single species, and achieves

diversity by using a different tree on each street. Metro Parks believes that species diversity is best addressed in that way, at a city-wide scale, not by preventing design unity on individual sites.

Also, please note the misuse of the plural *genera* where the singular *genus* is called for, and the fact that since there is only one meaning of the word *genus*, it need not be defined in the code's glossary nor capitalized.

13.06.502 D. Credits and Flexibility, 2. Tree Retention. *To be eligible for this credit, trees must be at least 6 inches in diameter at breast height (DBH) at the time of plan submittal.*

Requiring retained trees to be at least 6" in diameter makes no sense: developers would need to remove perfectly good trees less than 6" to make room for the new trees (at 1.5" to 2.5" diameter) that will be required.

13.06.502 D. Credits and Flexibility, 6. Self-managed Agencies. Metro Parks was generally in accord with the self-managed agency provisions in the mid-January draft of the landscaping code. But something changed between January and February. The language in the current draft of the self-managed agency provisions calls for more detailed oversight of other agencies by the City, such as reviewing program operations, which go beyond the scope and qualifications of the City to administer. Instead of asking consistency with City urban forestry goals and policies, it asks agencies to specifically demonstrate consistency with the City's Urban Forestry Policy element, which is a set of policies and procedures guiding City action, and not generally applicable to other agencies.

On a more technical note, designating the areas where required landscaping will be planted is not feasible as part of a request for self-managed agency status. Metro Parks has current condition assessments and target planting goals for each of its 75 sites, but specific planting plans are developed only with a budget and appropriate plan review. Showing the alternate locations where an agency proposes to shift required landscaping is reasonable within a request for landscaping flexibility on a specific project, but not as part of a global request to be considered a self-managed agency.

Under section 6b, the Director of PDS can deny a request for flexibility if a self-managed agency cannot demonstrate that previous shifting of required landscaping has been successful. Self-managed agency status can then be extended or revoked on the basis of performance, which is reasonable. But the current draft of section 6a adds a five-year limit on approval of self-managed agency status, and allows the Director of PDS to revoke that status at any time within those five years without specifying why. With these changes, the intent of self-managed agency status has shifted from cooperative sharing of urban forestry leadership to City oversight and control of agency programs, and as such is unlikely to be used. Metro Parks looks forward to working with City staff and other agencies to develop a self-managed agency procedure that works for all parties.

13.06.502 E Landscaping requirements applicable to Residential, Commercial, Industrial and Mixed-Use Districts. Overall Site Landscaping.

Metro Parks is concerned that the minimum number of trees required, listed in a few places in Section E, will not leave enough room for them to grow. At the density required, Large Trees would have to be less than 23 feet apart, and Medium Trees less than 20 feet apart, which is more appropriate spacing for small trees.

13.06.502 E. Landscaping Buffers, Planting – when abutting R-District

This section requires a screen of conifers to be planted 10 feet apart. Trees that will reach 8 feet wide at 5 years, as this code requires (Section C2e(4)), will tend to be 20 feet wide at 20 years, and are liable to be unhealthy at 10-foot spacing.

Thank you, Peter for this opportunity to review the proposed changes to the Landscaping Code. We look forward to working with staff to address these issues as this document moves through the adoption process.

Sincerely,

Doug Fraser

**Chief Planning Manager**

Metro Parks Tacoma  
4702 S 19th Street  
Tacoma, Wa. 98405

Phone: (253) 305-1019

FAX: (253) 305-1098

[dougf@tacomaparks.com](mailto:dougf@tacomaparks.com)



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**From:** [Guthrie, Mark](#)  
**To:** [Barnett, Elliott](#); [Lindgren, Tony](#)  
**Subject:** Fwd: Dist Ops Landscape Code comments  
**Date:** Thursday, February 27, 2014 11:19:55 AM

---

This (see below) just came back this morning, Elliot.

Mark Guthrie  
Water Program Specialist  
Tacoma Water - Tacoma Public Utilities  
253-396-3152

Begin forwarded message:

**From:** "Foss, Cindy" <[CFOSS@ci.tacoma.wa.us](mailto:CFOSS@ci.tacoma.wa.us)>  
**Date:** February 27, 2014 at 9:15:51 AM PST  
**To:** "Guthrie, Mark" <[MGuthrie@ci.tacoma.wa.us](mailto:MGuthrie@ci.tacoma.wa.us)>  
**Cc:** "Lindgren, Tony" <[tlindgren@ci.tacoma.wa.us](mailto:tlindgren@ci.tacoma.wa.us)>, "West, Ray" <[rwest@ci.tacoma.wa.us](mailto:rwest@ci.tacoma.wa.us)>, "Sugiyama, Bill" <[bsugiyam@ci.tacoma.wa.us](mailto:bsugiyam@ci.tacoma.wa.us)>, "Hinzman, Bob" <[BHINZMAN@ci.tacoma.wa.us](mailto:BHINZMAN@ci.tacoma.wa.us)>  
**Subject:** RE: Dist Ops Landscape Code comments

Mark,

Our additional comments are noted below after review of the updated Landscape Code.

The following questions from the original request were not addressed:

- <!--[if !supportLists]-->• <!--[endif]-->Who will manage the homeowner/business owner contact and expectations? -- such as where trees will be planted?
- <!--[if !supportLists]-->• <!--[endif]-->How will we make sure that trees are not planted by water structures such as meter boxes, hydrants, etc.?
- <!--[if !supportLists]-->• <!--[endif]-->It would be helpful to have utility exemptions called out where appropriate.
- <!--[if !supportLists]-->• <!--[endif]-->What is a PMI District?
- <!--[if !supportLists]-->• <!--[endif]-->There is nothing in the plan about road maintenance, only capital road projects. What happens for jobs such as main failure, hydrant replacement and service renewals?
- <!--[if !supportLists]-->• <!--[endif]-->What is the definition of a capital street improvement project?
- <!--[if !supportLists]-->• <!--[endif]-->If we participate in a road project and install water main do we pay for the installation and maintenance of

trees? Will this hold off the completion of projects until the trees no longer require follow up?

In addition our concern is what this really means for utilities doing work in the right of way. There is one section that talks about when this code applies and pages on what to do if it applies. The section on what this applies to (second section on the first page) is not clear. Typically utilities are working in the right of way – not developing property for their use.

If this does require use to plant trees when doing work; the maintenance of trees could have a huge staffing impact. Also, the relationship with those in the area we are working could be impacted when we plan a tree where they used to park, plant a garden, etc.

Thank you  
Cindy

---

**From:** Foss, Cindy  
**Sent:** Wednesday, January 29, 2014 1:29 PM  
**To:** Guthrie, Mark  
**Cc:** Lindgren, Tony; West, Ray ([rwest@ci.tacoma.wa.us](mailto:rwest@ci.tacoma.wa.us)); Sugiyama, Bill ([bsugiyam@ci.tacoma.wa.us](mailto:bsugiyam@ci.tacoma.wa.us)); Hinzman, Bob ([BHINZMAN@ci.tacoma.wa.us](mailto:BHINZMAN@ci.tacoma.wa.us))  
**Subject:** Dist Ops Landscape Code comments

Mark,

Distribution Operations comments and questions on the Landscape code are below:

Who will manage the homeowner/business owner contact and expectations? -- such as where trees will be planted?

How will we make sure that trees are not planted by water structures such as meter boxes, hydrants, etc.?

It would be helpful to have utility exemptions called out where appropriate.

What is a PMI District?

There is nothing in the plan about road maintenance, only capital road projects.

What happens for jobs such as main failure, hydrant replacement and service renewals?

What is the definition of a capital street improvement project?

If we participate in a road project and install water main do we pay for the installation and maintenance of trees? Will this hold off the completion of projects until the trees no longer require follow up?  
“replacement of more than 50% of existing sidewalks” – 50% of what, in front of the house, the whole block?  
What is considered a full roadway section?

Thank you for coordinating this for us.  
Cindy

**Cindy Foss | Tacoma Water**  
**Asst Water Distribution Operations Mgr**  
**253-502-8682 | [cfoss@cityoftacoma.org](mailto:cfoss@cityoftacoma.org)**

702 Broadway Suite 101,  
Tacoma, Washington 98402  
Phone: (253) 779-8890  
Fax: (253) 593-8890  
Email:  
PCRS@pugetcreek.org  
WebPage:  
www.pugetcreek.org



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nonprofit organization with  
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March 21, 2014

Planning Commission  
747 Market Street, Room 345  
Tacoma, WA. 98402

Honorable Planning Commission:

The Puget Creek Restoration Society (PCRS) protects, enhances and restores the Puget Creek Watershed and similar streams, wetlands and green spaces. We serve the South Puget Sound communities and invite their participation through hands-on restoration, research, education, advocacy, and by promoting a sense of stewardship.

Our organization represents over 3,000 members and volunteers located in the City of Tacoma and who are deeply concerned with wetland, stream, green space and nearshore issues in the City.

Thank you for allowing us to provide input into this process. We request the following conditions be incorporated into the project and response to our questions be developed:

Pertaining to Planning Commission Public Hearing on Proposed Amendments:

**#6 Open Space Habitat and Recreation Element**—Our first comment is that the maintenance of invasive non-native plant species such as Himalayan and Evergreen Blackberry; English Laurel and Holly; English Ivy and Clematis; English Morning Glory/Hedge Bindweed; Japanness Knotweed; Reed Canary Grass; Spurge Laurel; Poison Hemlock and Herb Robert needs to get looked at different by the City. These plants are extremely invasive and destabilize and destroy native habitat and thus need to have a classification by the City as: **remove when found and have maintenance in place to keep new populations from taking a hold.** Having a code in place to allow that will help in keeping existing restored areas from getting influx of new populations and give those working in fields more le-way in protecting and maintaining areas. Even in the critical areas as those are the most sensitive.

Also the City must take a more pro-active role in not allowing encroachment by private residents into the community natural areas and increase fines and mitigation.

**#7 Sustainability Code Amendment**—Must also include more responsive and supportive action in helping to protect and sustain the natural areas and green belts as these are hand-in-hand with health and active living

#8 urban Forestry landscaping Code Update—The City must not allow any tree cutting in public areas especially in the natural areas as the natural areas are finite in what is there and any decrease of canopy is not benefiting support and sustaining these natural areas. Planting of native trees is what should have the most president as that is what supports wildlife and our ecological functions in this region. Thus planting of non-native trees adjacent or close to natural areas allows for the influx of non-native seeds etc. into the natural areas and destabilizes the habitat.

Without further clarification of the impact that the process has on the natural systems, the Puget Creek Restoration Society cannot support this process; however, if the plan were to incorporate our comments, questions and concerns in these documents we would reconsider our position.

I write as a Member of the Board of Directors of Puget Creek Restoration Society, which has evaluated the proposed project. We will appreciate your office's full consideration of our position, and we look forward to working with you in making Tacoma a better place for everyone.

Thank you for your consideration in this matter. You can reach us at (253) 779-8890 if you have any questions.

Sincerely,

Scott M. Hansen-B.S., M.A., M. S., (Ph.D.-student)  
Ecologist/Member Board of Directors

March 11, 2014

Lihuang Wung  
City of Tacoma  
lwung@cityoftacoma.org  
Tacoma, WA 98402

**RE: SEP2014-40000218532; SR0173850  
City of Tacoma**

Dear Lihuang Wung:

The Tacoma-Pierce County Health Department's Environmental Health Program received the above mentioned checklist on March 03, 2014 and has reviewed your proposal.

There are no objections to the proposal as presented.

Thank you for the opportunity to respond. If you have further questions, please contact me at (253) 798-2851 or by e-mail at bharp@tpchd.org.

Sincerely,



Brad D. Harp  
Environmental Health Division

BDH:sfr

**From:** [Hedman, Marcie](#)  
**To:** [Barnett, Elliott](#); [Flynn, Ryan](#)  
**Subject:** RE: Review Proposed Urban Forestry (Street Tree) Ordinance with Elliott Barnett  
**Date:** Tuesday, March 11, 2014 3:05:54 PM

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Thank you for including me but we won't be able to attend today's meeting. We have reviewed the document and it does not appear to have much impact on our group. Thanks for keeping us in the loop.

**Marcie Hedman | Tacoma Power**

**Assistant Transmission & Distribution Manager**

***T&D Electrical Services Manager***

**P: (253) 502-8486 | C: (253) 230-9368**

**F: (253) 502-8648 | <http://www.mytpu.org/tacomapower/electrical-permitting/>**

---

**From:** Barnett, Elliott  
**Sent:** Tuesday, March 11, 2014 9:45 AM  
**To:** Flynn, Ryan; Seabrands, Dan; Kammerzell, Jennifer; Hedman, Marcie; Payne, Jeff S (jeff.payne@pse.com); Prussen, Kari; Pooley, Desiree; Ward, Erik; Sugiyama, Bill  
**Subject:** RE: Review Proposed Urban Forestry (Street Tree) Ordinance with Elliott Barnett

Hi everyone, I'm looking forward to talking with you this afternoon. Please note, the packet Ryan forwarded out was not the most recent one with the full proposal. I think everyone's probably got it by now but just in case, here it is again.

Talk to you soon!

<< File: Urban Forestry Section - 2014-10.pdf >>

-----Original Appointment-----

**From:** Flynn, Ryan  
**Sent:** Tuesday, March 04, 2014 10:31 AM  
**To:** Seabrands, Dan; Kammerzell, Jennifer; Hedman, Marcie; Barnett, Elliott; Payne, Jeff S (jeff.payne@pse.com); Prussen, Kari; Pooley, Desiree; Ward, Erik; Sugiyama, Bill; Flynn, Ryan; Boudet, Brian  
**Subject:** Review Proposed Urban Forestry (Street Tree) Ordinance with Elliott Barnett  
**When:** Tuesday, March 11, 2014 3:00 PM-4:00 PM (UTC-08:00) Pacific Time (US & Canada).  
**Where:** Tacoma Water, Conf 2A (TPU, 2nd Floor behind Permit Counter)

All,

This meeting is a follow up to the conversation initiated at the last Infrastructure Meeting

regarding the Urban Forestry (Street Tree) Ordinance. It will be a good opportunity to provide Elliott your comments and raise any concerns you may have.

Attached please find the most recent rendition of the Urban Forestry Ordinance language.

Thanks,

Ryan Flynn

<< File: D3 Attach-D Urban Forestry (2-19-14).pdf >>



*Sw*  
DEC 04 2013

Sean Gaffney, Chair  
Tacoma Planning Commission  
747 Market Street, Room 345  
Tacoma, WA 98402

November 18, 2013

Dear Chair Gaffney:

On September 19, 2013, the West End Neighborhood Council heard a proposal by Pt. Ruston LLC with J.J. McCament et al, stating their proposal to designate a portion of the former ASARCO property as a Mixed-Use Center. The West End members feel that Pt. Ruston will be a great addition to our area and knowing that the residential area included in this design will make a Mixed-Use Center of high quality, we voted unanimously to support this amendment.

We feel strongly that this redevelopment will be a significant improvement to the area, and bring in a high quality of mixed-income housing, along with the Mixed-Use Center, on land that has previously been closed to the public for many years. The remediation of this area has been remarkable and we look forward to the creation of a vibrant, bustling waterfront area that will eventually bring many new people and businesses to our neighborhood.

If we can be of further help in this matter, please do not hesitate to contact either myself at 253-278-3398, or Ginny Eberhardt at 253-224-6967.

Sincerely,

Ken Kingsbury, Chair  
West End Neighborhood Council

cc: J.J. McCament

March 14, 2014

Planning Department  
City of Tacoma  
747 Market Street, Room 345  
Tacoma, WA 98402

Planning Commission and City Planners:

This letter is in reference to the proposed Sustainability Code Amendments for 13.06.510(F) regarding Electric vehicle parking requirements. On behalf of the Master Builders Association of Pierce County (MBA Pierce), thank you for your consideration of these comments.

MBA Pierce and its members would like to express concern over the proposed code changes and the resulting problems they would cause. The following provisions within the proposed amendments have been identified specifically as being areas of concern for the building industry:

1. **Ch. 13.06.510(F)(1)** “Application: The following requirements apply to all new development and alternations that, within a two-year period, exceed 50 percent of the value of existing development or structures, as determined by the Building Code, unless specifically exempted herein. The standards do not apply to remodels that do not change the exterior form of the building. However, if a project involves both exterior and interior improvements, then the project valuation shall include both exterior and interior improvements.”

MBA Pierce contacted city staff and confirmed that the stated intent of this section was to provide requirements for multi-family housing, offices, institutional buildings, retails and shopping centers and auditorium, stadium and theater locations which are all listed in subsections (2) and (3). Subsection (1) references “*all new development and alterations*” which could be interpreted to include single-family housing since it is not specified that these requirements apply only to those listed properties in the subsequent subsections and single-family housing is not listed as being “*specifically exempted*”.

MBA Pierce requests that this be clarified in the language to ensure that it is not misinterpreted to include single-family housing in the future.

2. **Ch. 13.06.510(F)(2)** “Multifamily uses shall provide electric vehicle infrastructure for 10% of the parking spaces provided, such that a future level 2 charging station can be accommodated.”

The proposed language will result in infrastructure that will not be utilized or located in the proper location at multi-family dwellings and will result in an unnecessary expense on the

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building industry. Multi-family housing normally requires assigned spaces, meaning there is no guarantee that the electric vehicle infrastructure will be placed in the appropriate parking spot or in a close proximity to the condo or apartment where the resident owning the electric vehicle is living. Additionally, this creates the problem of dividing out the electric bill if a resident moves into a housing unit that has an electric meter which does not correspond with the electric vehicle parking space. This means that the builder will then have to move the electric vehicle infrastructure later on to eliminate these issues, creating further expense. These regulations would be better instituted as incentives for building electric vehicle infrastructure at a time where a resident actually requests to have it installed.

Furthermore, requiring electric vehicle infrastructure in an industry where technology is constantly changing would be wasteful. For example, automakers are set to introduce hydrogen fuel cell vehicles in 2015 and companies such as Toyota, Hyundai and Honda believe that fuel cells will be the fuel of the future. Please see the below articles discussing this technology:

<http://cars.chicagotribune.com/fuel-efficient/news/chi-hydrogen-or-electric-vehicles>

<http://www.usatoday.com/story/money/cars/2014/02/09/toyota-hydrogen-fuel-cell-car/5313917/>

These articles illustrate how quickly the market can change in regards to technology and why something such as installing electric vehicle infrastructure should be market-driven as there is no guarantee that within the coming years this technology will not be replaced by another more efficient alternative fuel source such as hydrogen fuel cells. The proposed multi-family housing electric vehicle parking requirements discussed above will add expense to development and will result unnecessary hardships when other incentive-based avenues are available to achieve valuable environmental goals.

MBA Pierce requests that the Planning Commission reconsider the various provisions of this ordinance before moving this forward to City Council.

Thank you for your consideration of these comments. Please feel free to contact me with any questions you may have.

Sincerely,



Jeremiah J. Lafranca, Government Affairs Manager

Cc: Sean Gaffney, Chair  
Donald Erickson  
Stephen Wamback  
Erle Thompson  
Tina Lee

Scott Winship, Vice-Chair  
Benjamin Fields  
Chris Beale  
Alexandria Teague

March 18, 2014

Planning Department  
City of Tacoma  
747 Market Street, Room 345  
Tacoma, WA 98402

Planning Commission and City Planners:

This letter is in reference to the proposed Land Use Regulatory Code Amendment to 13.04.095 regarding pipestem lots. On behalf of the Master Builders Association of Pierce County (MBA Pierce), thank you for your consideration of these comments.

MBA Pierce and its members would like to express concern over the proposed code changes and the resulting problems they would cause. The following provisions within the proposed amendment have been identified specifically as being areas of concern for the building industry:

1. **Ch. 13.04.095(D)(3)(a)** “Pipestem lots shall have the same setback along all lot lines. In the R-1 District the setback shall be 15 feet. For all other districts the setback shall be 10 feet.”

The proposed language will limit the potential development of pipestem lots. The setback requirements would prevent building on some pipestem lots due to size restrictions that would result and would thus interfere with Tacoma’s goals of creating more infill to prevent urban sprawl. These new standards would leave property underdeveloped which could be otherwise utilized to prevent potential home buyers from building homes elsewhere and thus resulting in a more adverse environmental impact.

MBA Pierce requests that the Planning Commission reconsider this provision and seek more involvement from the building community before moving this forward to City Council.

2. **Ch. 13.04.095(D)(3)(b)** “The height of the main building on a pipestem lot shall be no taller than 25 feet or no more than the average of the height of the dwellings on each abutting property line and shall not exceed the height of the zoning district.”

The proposed language interferes with a property owner’s rights to have the same height restrictions as other homes within their zoning district. This creates a discriminatory standard that would prevent a homeowner on a pipestem lot from being able to maximize the potential of their property due to the decisions of neighbors that moved in prior to them building their own home. Additionally, when this subsection is combined with subsection (a) listed above, the ordinance will result in limiting development of pipestem lots in general. The amendment would result in significant restrictions on the size of the home with the listed setbacks and then adding

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in height restrictions will prevent the development of many pipestem lots and as mentioned above will not correlate with Tacoma's goals of achieving a greater level of infill.

MBA Pierce would ask the Planning Commission to consider the goals of the Growth Management Act (GMA), which seeks to prevent urban sprawl and encourage compact development.<sup>1</sup> Pipestem lots are an effective way of eliminating sprawl by utilizing properties to their fullest potential. Another goal of the GMA is to direct new housing into existing urban areas to ensure there are adequate public facilities.<sup>2</sup> Tacoma is the major urban center in Pierce County and accepting growth by increasing density will serve the city's goal of creating more infill and will correlate with GMA goals of building near adequate public facilities. The proposed amendment adversely impacts potential development, thus leaving properties underdeveloped which will not further the goals of the GMA nor will it assist Tacoma in creating more infill.

MBA Pierce requests that the Planning Commission reconsider the various provisions of this ordinance before moving this forward to City Council.

Thank you for your consideration of these comments. Please feel free to contact me with any questions you may have.

Sincerely,



Jeremiah J. Lafranca, Government Affairs Manager

Cc: Sean Gaffney, Chair  
Donald Erickson  
Stephen Wamback  
Erle Thompson  
Tina Lee

Scott Winship, Vice-Chair  
Benjamin Fields  
Chris Beale  
Alexandria Teague

<sup>1</sup> RCW 36.70A.020(2) Reduce sprawl. Reduce inappropriate conversion of undeveloped land into sprawling, low-density development.

<sup>2</sup> RCW 36.70A.110(1) Urban growth should be located first in areas already characterized by urban growth that have adequate existing public facility and service capacities to serve such development, second in areas already characterized by urban growth that will be served adequately by a combination of both existing public facilities and services and any additional needed public facilities and services that are provided by either public or private sources, and third in the remaining portions of the urban growth areas. Urban growth may also be located in designated new fully contained communities as defined by RCW 36.70A.350.

**From:** [Payne, Jeff S](#)  
**To:** [Barnett, Elliott](#)  
**Subject:** Urban Landscape Code  
**Date:** Friday, March 21, 2014 10:43:55 AM

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Hi, Elliott,

First, I just want to thank you for meeting with us last week and allowing all of the utilities to ask questions and provide responses to the proposed new Urban Forestry Landscaping Code.

It is my reading of the language that it is the City's primary intention to enhance (beautify) street landscapes that are either being fully reconstructed, or are subject to development by third parties as part of their respective frontage improvement requirements. PSE recognizes the City's desire to improve streetscapes and does not want to interfere with that goal but we would like to point out a few items for consideration.

Planting trees over existing utility infrastructure creates some potential issues for the utilities; it makes it harder to access our facilities and to perform necessary maintenance and operations procedures. It also creates issues when we go to install new, or upgraded, facilities; the space within the City's ROWs are becoming increasingly crowded and it is harder and harder to find alignments in which we can place our facilities without the added complication that street vegetation presents to us. The separation requirements set forth in the new language is helpful in terms of recognizing existing utility infrastructure but it doesn't take into account that new, or upgraded, infrastructure needs room for safe placement. We also encourage the City to reconsider the planting of any 'large' trees in the ROW because of how root structures can get entangled with utility infrastructure and also create problems for street curbs and sidewalks.

We also believe that utility ratepayers should not be subject to incurring the cost of making 'new' landscaping improvements to the ROW. We agree that we should replace anything that we damage, or remove, as a result of maintaining and operating our facilities but we do not think it is reasonable to require utility ratepayers to shoulder the burden of providing new improvements to the ROW. In those instances in which we do have to replace vegetation (hopefully restricted to existing vegetation) we believe it would be beneficial if the cost associated with the improvements was identified on the permit so that funds could be provided in lieu of taking on the responsibility of installing and maintaining vegetation until it has sufficiently taken hold.

For these reasons, we respectfully request that utilities be exempted from the newly proposed vegetation requirements in the Urban Forestry Landscaping Code.

I appreciate the opportunity to provide comments on this matter and am available to discuss any questions that you might have.

Sincerely,

*Jeff Payne*  
*Puget Sound Energy*

*Municipal Liaison Manager*  
*(253) 476-6267 Office*  
*(253) 304-5049 Cellular*

**CITY OF TACOMA**  
**AFFORDABLE HOUSING POLICY ADVISORY GROUP**

March 20, 2014

By hand  
By e-mail: [planning@cityoftacoma.org](mailto:planning@cityoftacoma.org)

Tacoma Planning Commission  
747 Market Street, Room 1036  
Tacoma, WA 98402

Re Comments on proposed 2014 amendments to the City's  
Comprehensive Plan and Land Use Regulatory Code

Dear Planning Commissioners:

We write to comment on the proposed 2014 amendments to the City of Tacoma's Comprehensive Plan and Land Use Regulatory Code that the Planning Commission will consider this Spring. We hope our comments are helpful to you.

We offer these comments on behalf of the City's Affordable Housing Policy Advisory Group. The City Council initially convened this group on April 27, 2010 by Resolution 38071. That resolution asked the group to propose policies that would promote the preservation or development of affordable housing in the City. The group submitted its recommendations to the City Council on December 3, 2010. *See* Policy Recommendations to the City Council (December 3, 2010). If you have not yet reviewed our recommendations, we ask you to do so. On May 17, 2011, by Resolution 38263, the Council reconvened the group so it can remain available as a source of further advice and assistance while the City considers the group's recommendations.

Among its recommendations, the group proposed principles and acknowledgements to govern City policy. *See* Policy Recommendations, section 3.1. By Resolution 38264, on May 17, 2011, the City Council directed the Planning Commission to incorporate these into the City's Comprehensive Plan. We enclose a copy of that resolution.

We comment on the following two proposals:

**1. Point Ruston Mixed-Use Center: Application #2014-01**

We favor the proposal to designate as a Mixed-Use Center that portion of the Point Ruston development located in the City of Tacoma. Among other benefits, this designation would make available to the project the City's multifamily tax exemption and its companion provision for the inclusion of affordable housing for lower income households. Point Ruston is an impressive and ambitious project that will bring housing

c/o 902 South L Street, Tacoma, WA 98405, (253) 207-4429

and commercial development to the site. It and the City need policies and mechanisms that would provide for the inclusion of housing that is affordable to lower income households. This inclusion would serve several purposes, all of them congenial to the goals and civic purposes of the project. **First**, it would help to economically and racially integrate the new community. This diversity will add to its vibrancy. It will also make it more closely resemble the City's population. **Second**, such inclusion would provide housing for the low wage workers who will staff the commercial establishments of the community. Nearby housing affordable to them will reduce their commutes and diminish traffic congestion along Ruston Way. **Third**, such inclusion would help alleviate the City's acute shortage of affordable housing.

We urge the planning commission to approve Point Ruston's Mixed-Use Center application and in other ways to be alert for mechanisms to include affordable housing in the project's market rate mix. We refer you to our Policy Recommendations for ways to do that.

**2. Affordable Housing: Application #2014-06**

We also favor the four changes pertaining to affordable housing.

- *Parking Exemption for Group Housing, Student Housing and Small Multi-Family Housing.*

We support the proposal to exempt from parking requirements group housing, student housing and certain small multi-family housing up to 20 dwellings or 50 percent of the total dwellings in a building, whichever is greater. Such housing can be a valuable part of the City's affordable stock. Occupants of such housing often do not need parking. Parking requirements can be expensive, especially when they are not necessary. We favor letting the developers of such housing judge the amount of parking the market will require.

- *Update and Reduce Parking Requirements for Group Housing and Multi-Family Housing*

For the same reasons, we support the proposal to reduce the parking requirements for group housing and multi-family housing.

- *Accessory Dwelling Units (ADUs)*

We support the proposals to encourage the development of Accessory Dwelling Units (ADUs) and make them more feasible in more locations. ADUs can serve three purposes, all of them valuable to the City's effort to promote affordable housing options. **First**, ADUs can provide affordable rental housing. They are generally small in size and

suitable for small households that cannot pay for a full sized apartment. **Second**, ADUs allow a homeowner to supplement his or her income with a rental income. This can make homeownership more affordable to a wider income range of homeowners and home purchasers. This option may be especially useful to seniors who may need an extra income to afford their homes. **Third**, ADUs can allow caregivers to live in close proximity to seniors who may need that help to remain in their homes.

ADUs can serve all these purposes in a way that is architecturally compatible with single family housing patterns.

- *Update Small Lot Standards*

We support the proposal to make the rules governing small lots more flexible. We also support the reasons for the proposal: it will promote responsible infill development and promote the development of housing that is more likely to be affordable. The companion design standards should make this form of housing compatible with the neighborhood without unduly imposing more design strictures than those that govern other types of housing.

We also wish to express our appreciation for the City's planning staff. We know this effort requires their careful thought and close attention to detail. It is not easy to polish these proposals so they further the City's policy goals and fit with the rest of the City's complex code and planning documents. We also know that the staff are not situated to receive appropriate thanks for their hard work. We extend ours.

We also appreciate the efforts of the Planning Commission. We hope our comments are helpful. If we can be of further assistance, please let us know. In

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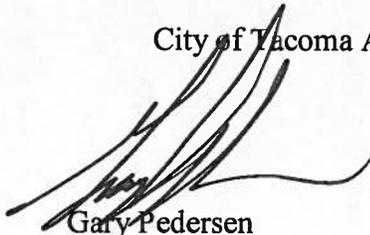
particular, we look forward to the Commission's review of our remaining recommendations. These include:

- Affordable Housing Incentives Code and Program
- Affordable Housing Inclusionary Proposals
  
- Affordable Building/Residential Infill strategies (including cottage housing, detached ADU's, Planned Residential Districts).

We look forward to this further work with you.

Cordially,

City of Tacoma Affordable Housing Policy Advisory Group



Gary Pedersen  
Co-Chair



Michael Mirra  
Co-Chair

Cc: City Councilmember Lauren Walker  
T.C. Broadnax, City Manager  
Ian Munce, City of Tacoma

-----Original Message-----

From: Prussen, Kari

Sent: Friday, March 21, 2014 2:09 PM

To: Barnett, Elliott

Cc: Knickerbocker, Jessica; Flynn, Ryan; Carey, Mike

Subject: Street Tree Recommended Changes

Hi Elliott,

Attached are Jessica, Ryan, and my combined comments. Please let us know if you have any questions. Thank you for providing us the opportunity to provide our input.

Kari

Environmental Services and Tacoma Water have the following joint comments and requested changes on the proposed landscaping code.

1. The purpose for this change is to clarify the definition of capital street improvement projects consisting of full subgrades and road surfaces with established alignments. In temporary roadways with no permanent alignment yet established (such as oil mat roads and asphalt roads with no curb and gutter), the planting of street trees, and ensuring survival of those trees, will be very difficult. The right of way adjacent to pavement in temporary roadways is often used by residents for gravel parking shoulders, ditches, or other features that would not be conducive to planting trees.

*Revise Section 13.06.502.B.2.b to read:*

b. Constructing new permanent roadways, excluding residential Local Improvement Districts; alterations to the width of existing permanent roadways; constructing new sidewalk; replacing more than 50% of an existing sidewalk along a site's frontage. In the case of sidewalk replacement, street trees shall be required proportionate to the linear footage of sidewalks replaced.

*Include the following definition in Section 3.06.700.P:*

Permanent Roadway. Roadway constructed with a designed full depth subgrade and road surface section with an established curb and gutter alignment.

2. The mere construction of new sidewalk is not intended to necessitate the street tree requirement. Rather the construction of new sidewalk in excess of a certain length would necessitate the street tree requirement (example: for an off-site improvement the construction of new sidewalk along 50% of the site frontage would necessitate the street tree requirement; for projects within the right of way the construction of new sidewalk along 50% of the project's length would necessitate the street tree requirement).

While constructing, repairing, or replacing utilities within the right of way it is sometimes necessary replace existing sidewalk to facilitate the construction of items including but not limited to fire hydrants, water services, side sewers, and curb ramps. We request that sidewalk replaced in order to construct these items be explicitly exempted from the street tree requirement.

3. When performing maintenance or repair on a water meter or fire hydrant, it is common that Tacoma Water staff would need to excavate around the meter box/vault or fire hydrant. By allowing trees to be planted with 5 feet of an underground utility it increases the potential that tree root systems may be damaged during maintenance activities. To reduce the opportunity for the trees to be damaged and trees to damage utilities, we request the separation between trees and underground utilities be increased to 10 feet.

*Revise Section 13.06.502.C.2.e.2 to read:*

Species shall be selected to avoid or minimize potential conflicts with infrastructure and utilities. Trees under power lines shall have a maximum mature height not greater than 25 feet. New tree plantings shall be a minimum of 2 feet from pavement (curb, sidewalk, alley, street), 5 feet from a structure, 10 feet from underground utilities, and 10 feet from light standards. The UFM contains additional guidelines on this subject.

**From:** [Ken Rody](#)  
**To:** [Magoon, Jana](#)  
**Cc:** [Barnett, Elliott](#)  
**Subject:** Re: Proposed Land Use Changes  
**Date:** Tuesday, March 11, 2014 11:01:36 AM

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Thanks Jana,

I reviewed the code changes and it looks like they basically would follow the small lot design standards already in place for the 45' wide small lots that we have now. The only one I thought was not necessary was the required one street tree for the small lots. Some of the time this area may be used for a driveway if an alley isn't there and if the new residents don't water it the tree will probably die depending on the time of year. We usually landscape our properties to make it very attractive anyway. Seems like another requirement that isn't really necessary and if the trees die nobody will care anyway.

Thanks for the chance for input.

Ken Rody

Ken Rody  
(253)-318-5711

On Tue, Mar 11, 2014 at 9:32 AM, Magoon, Jana <[JMAGOON@ci.tacoma.wa.us](mailto:JMAGOON@ci.tacoma.wa.us)> wrote:

Ken,

Thought you would want to know we are proposing some changes to our land use regulations related to lot width. There is discussion of allowing as small as 35 feet in width without a variance. I believe you have to maintain at least a 4,500 square foot lot. And, of course, there would be design requirements. The purpose of the proposed change is to limit the number of pipe-stem lots. The idea being the preferred development pattern is houses fronting on streets. I also left a message for Roy. The comment period for the proposed changes ends on March 21<sup>st</sup>. If you think this is a good thing, I encourage you to send comments. Elliott Barnett is the Planner assigned to shepherd this change through our legislative process. I included him in this e-mail. He could give you more information. His phone number is 591-5389.

Jana Magoon

Development Services | City of Tacoma

PHONE/CELL: [253.882.9713](tel:253.882.9713) | FX: [253-591-5433](tel:253-591-5433)

[jmagoon@cityoftacoma.org](mailto:jmagoon@cityoftacoma.org)





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Phone (253) 383-2429  
Fax (253) 383-2446  
chb@healthybay.org  
www.healthybay.org

December 3, 2013

Mr. Elliott Barnett  
Planning Services Division  
City of Tacoma  
747 Market Street, Room 345  
Tacoma, WA 98402

Re: Application #2014-01 – Point Ruston Mixed-Use Center

Dear Mr. Barnett:

This letter is in support of the above referenced application to amend the Comprehensive Plan and development regulations in order to designate the portion of the Point Ruston mixed-use development located in the City of Tacoma as a Mixed-Use Center.

CHB considers that the application is appropriate as the Point Ruston redevelopment site meets the definition as stated in TMC 13.17.010.C.: *“Mixed-use center” means a center designated as such in the land use element of the City’s Comprehensive Plan. A mixed use center is a compact identifiable district containing several business establishments, adequate public facilities, and a mixture of uses and activities, where residents may obtain a variety of products and services.*”

Point Ruston is located within the S-15 Point Ruston / Slag Peninsula Shoreline District, characterized in the Shoreline Master Program (SMP) as an Urban Environment with a High Intensity Environmental Designation. The SMP defines a mixed-use project as: “... developments **which include a combination of components, such as residential uses, hotels, marinas, habitat improvement actions, public access provisions, and other uses**”. Additionally, several references in the SMP describe Point Ruston as a “mixed-use center.”

The planned redevelopment of the Point Ruston site which is currently underway is consistent with the City’s intent and purpose in creating the Mixed-use center designation.

We urge the City of Tacoma Planning Commission to favorably consider Point Ruston’s application and approve the MUC designation.

Sincerely:

Leslie Ann Rose  
Senior Policy Analyst

cc: J.J. McCament

Board of Directors  
Bonnie Becker  
Cheryl Greengrove  
Kathleen Hasselblad  
Bett Lucas  
Melissa Braisted Nordquist  
Marco Pinchot  
Bill Pugh  
Lee Roussel  
Angie Thomson  
Sheri Tonn

A tax-exempt  
501(c)(3) Washington  
nonprofit corporation

**From:** [ksymer@symer.space](mailto:ksymer@symer.space) on behalf of [Kris Symer](#)  
**To:** [Atkinson, Stephen](#); [lwung@cityoftacoma.org](mailto:lwung@cityoftacoma.org)  
**Cc:** [253bikepedtag@googlegroups.com](mailto:253bikepedtag@googlegroups.com); [Wiatr, Diane](#)  
**Subject:** Letter from BPTAG regarding bicycle parking changes  
**Date:** Friday, March 21, 2014 2:29:08 PM

---

March 15, 2014

Planning Commission  
747 Market Street, Room 345  
Tacoma, WA 98402

To the members serving on the City of Tacoma's Planning Commission:

As you consider the proposed amendments to the Comprehensive Plan and Land Use Regulatory Code, please accept our vigorous support of the suggested changes to the Sustainability Code Amendments (section 13.06.512) pertaining to bicycle parking.

We appreciate that the proposed standards for bike parking are independent of vehicle parking requirements, which sends the message that cycling will always be an encouraged form of transportation.

We understand that people ride for different reasons and want to have a safe place to store their bikes once arriving at a destination. The specific standards relating to short and long-term parking, as well as the design and location of bike parking facilities, are valued additions. The proposed levels of bike parking, changing space, and shower facilities also seem appropriate (Tables 13.06.512 E and E:7). Overall, these changes are a huge step forward for active transportation in Tacoma.

We recommend one change regarding the trigger of "new construction and substantial alterations." We would like additional assurance that basic bicycle parking improvements will apply to popular public destinations such as parks--even though a significant remodel may not be planned. It is important that our city's public gathering spaces provide visitors arriving by bicycle a safe and designated location to lock up their bikes.

Thank you for considering our input. We are excited to see proposed changes that incorporate guidelines envisioned in the Mobility Master Plan. We believe these updates reinforce the city's goals of sustainable development, healthy living, transportation mode shifts, and greenhouse gas reduction.

Feel free to contact us with any questions and thank you for the opportunity to comment.

Sincerely,  
City of Tacoma Bicycle and Pedestrian Technical Advisory Group

David Cook, Co-Chair  
Kris Symer, Co-Chair  
Justin Camarata  
Janet Higbee  
Anne James  
Aaron Knight  
Jennifer Halverson Kuehn  
Paul Nordquist  
Kendall Reid  
Brandi Riddle



**Date:** March 21, 2014

**To:** Elliott Barnett, City of Tacoma Associate Planner

**CC:** Peter Huffman, City of Tacoma Director of Community Development  
Shannon Thompson, Parametrix  
Curtis Hancock, Metro Parks Tacoma  
Bruce Hopkins, City of Ruston Mayor  
Jennifer Robertson, Ruston City Attorney

**From:** Rob White, Planning Director for City of Ruston

**Subject:** **Point Ruston Mixed Use Center - Request for Comments**

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Dear Mr. Barnett,

Thank you for providing the City of Ruston with the opportunity to submit comments on Point Ruston's request for designation as a Mixed Use Center which is currently in review by the City of Tacoma. We appreciate the collaborative working relationship that has developed between Tacoma and Ruston on this project and look forward to continued cooperation between our jurisdictions as build out of this important project continues.

Generally speaking, the City of Ruston is in support of the Mixed Use Center designation and is pleased to see that Point Ruston is progressing with its project and we are hopeful that the issues identified within this letter can be addressed without delay. Since the project is located within the Tacoma boundary which is adjacent to the City of Ruston boundary, Tacoma asked Ruston staff to perform a cursory review. This review results in our sharing the following concerns.

**1) SEPA (FSEIS) Compliance – Parks, Open Space and View Corridors**

The proposed building foot prints in the pending Tacoma applications, (see applicant's Exhibit C) have been modified from the FSEIS site plan, (see staff report Exhibit B), without SEPA review or approval. More specifically, a number of pedestrian areas within these view corridors have been eliminated and replaced with driveways and/or parking lots. This represents both a degradation of expected quality of public space and a net decrease in overall open space for the project. As you will recall, Point Ruston FSEIS figures 6 and 10 (attached) require a specific amount of acreage to be developed as public promenade, interior public access, public roads and open/green space, which applicant's exhibit C proposes to reduce.

Further, it is the City of Ruston's opinion that the proposed increase in surface parking is in conflict with one of the intended goals of Mixed Use Centers, which is to decrease a projects dependence on single occupant vehicle use and increase dependence on public transportation. Replacement of pedestrian plaza space with unanticipated surface parking lots will not help to encourage utilization of public transportation. Instead, the applicant should be required to withdraw applicant's exhibit C from this application and commit to adhere to existing promises to provide

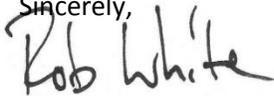
all parks, open space and view corridors as proposed and approved during the review of the FSEIS. See attached Figures 1 and 2 for additional details regarding additional inconsistencies.

**2) SEPA (FSEIS) Compliance – Cumulative Traffic Impacts**

The Point Ruston site plan (staff report exhibit B) identifies the foot print, general location, and size of buildings within the overall Point Ruston project. It appears from applicant’s exhibit C that some of the proposed buildings may have increased footprints, densities, and/or overall gross square footage. Has Tacoma evaluated what additional impacts will result from these proposed increases? Has the applicant provided a revised traffic impact analysis to determine appropriate additional mitigation beyond what was addressed under the current FSEIS? The City of Ruston recommends that the City of Tacoma require a revised concurrency evaluation prior to a recommendation for approval of this application. Requiring this evaluation would be consistent with the Tacoma Municipal Code chapter on concurrency.

Again, the City of Ruston thanks you for the opportunity to submit our feedback on these pending applications. In the meantime, if you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



Rob White  
Planning Director  
City of Ruston

**Attachments:**

City of Tacoma Staff Report Exhibit B

Applicant’s Exhibit C

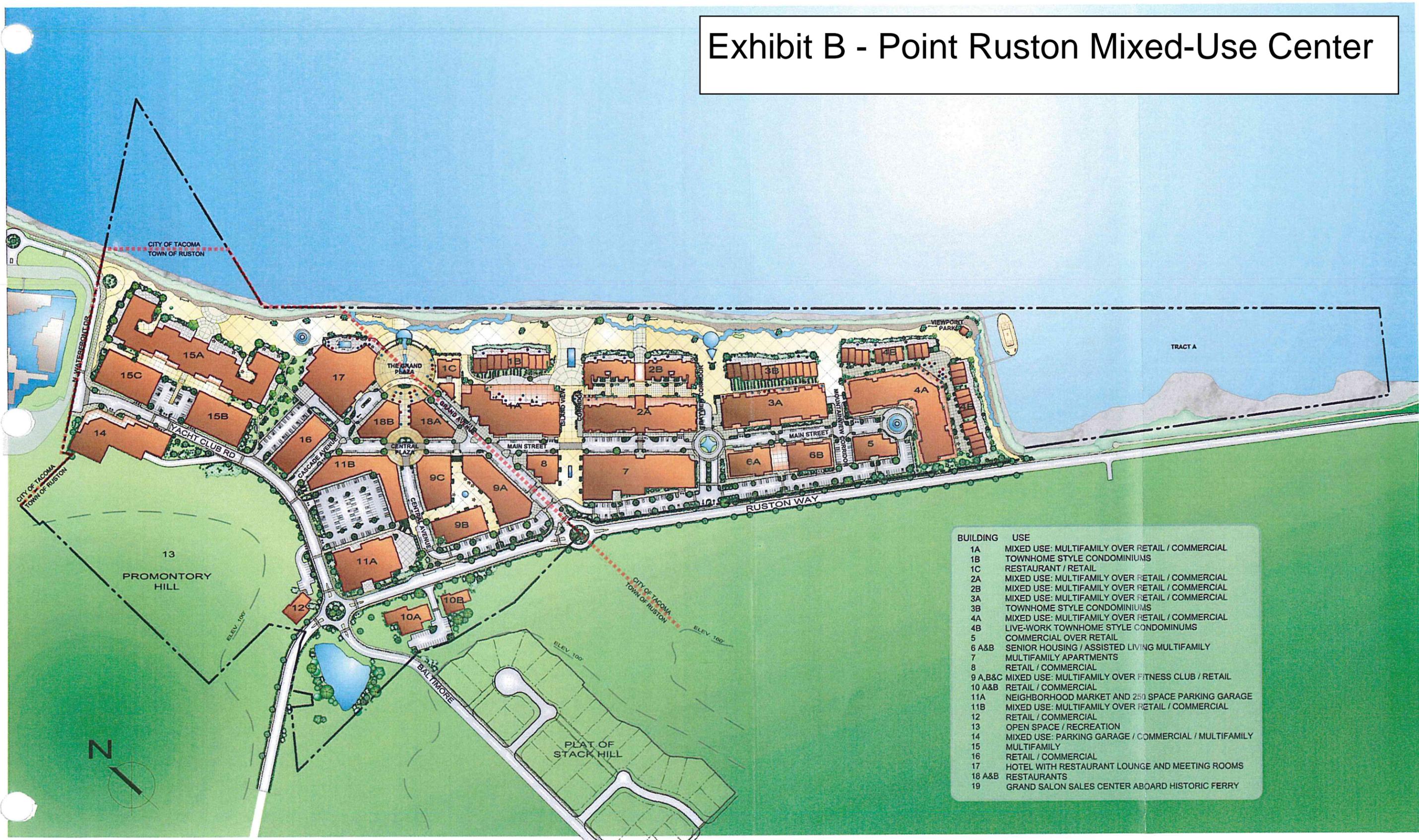
City of Ruston Review Comments Figure 1 - FSEIS Building Site Plan Comparison with Unapproved Plan

City of Ruston Review Comments Figure 2 – PRMDP Inconsistencies

FSEIS, Figure 6 - Public Access Plan

FSEIS, Figure 10 – Park Enhancements

# Exhibit B - Point Ruston Mixed-Use Center



BUILDING	USE
1A	MIXED USE: MULTIFAMILY OVER RETAIL / COMMERCIAL
1B	TOWNHOME STYLE CONDOMINIUMS
1C	RESTAURANT / RETAIL
2A	MIXED USE: MULTIFAMILY OVER RETAIL / COMMERCIAL
2B	MIXED USE: MULTIFAMILY OVER RETAIL / COMMERCIAL
3A	MIXED USE: MULTIFAMILY OVER RETAIL / COMMERCIAL
3B	TOWNHOME STYLE CONDOMINIUMS
4A	MIXED USE: MULTIFAMILY OVER RETAIL / COMMERCIAL
4B	LIVE-WORK TOWNHOME STYLE CONDOMINIUMS
5	COMMERCIAL OVER RETAIL
6 A&B	SENIOR HOUSING / ASSISTED LIVING MULTIFAMILY
7	MULTIFAMILY APARTMENTS
8	RETAIL / COMMERCIAL
9 A,B&C	MIXED USE: MULTIFAMILY OVER FITNESS CLUB / RETAIL
10 A&B	RETAIL / COMMERCIAL
11A	NEIGHBORHOOD MARKET AND 250 SPACE PARKING GARAGE
11B	MIXED USE: MULTIFAMILY OVER RETAIL / COMMERCIAL
12	RETAIL / COMMERCIAL
13	OPEN SPACE / RECREATION
14	MIXED USE: PARKING GARAGE / COMMERCIAL / MULTIFAMILY
15	MULTIFAMILY
16	RETAIL / COMMERCIAL
17	HOTEL WITH RESTAURANT LOUNGE AND MEETING ROOMS
18 A&B	RESTAURANTS
19	GRAND SALON SALES CENTER ABOARD HISTORIC FERRY

Figure 7  
Site Plan - Overall

Point Ruston Supplemental EIS

**Exhibit C**



PUGET SOUND

TACOMA  
RUSTON

19

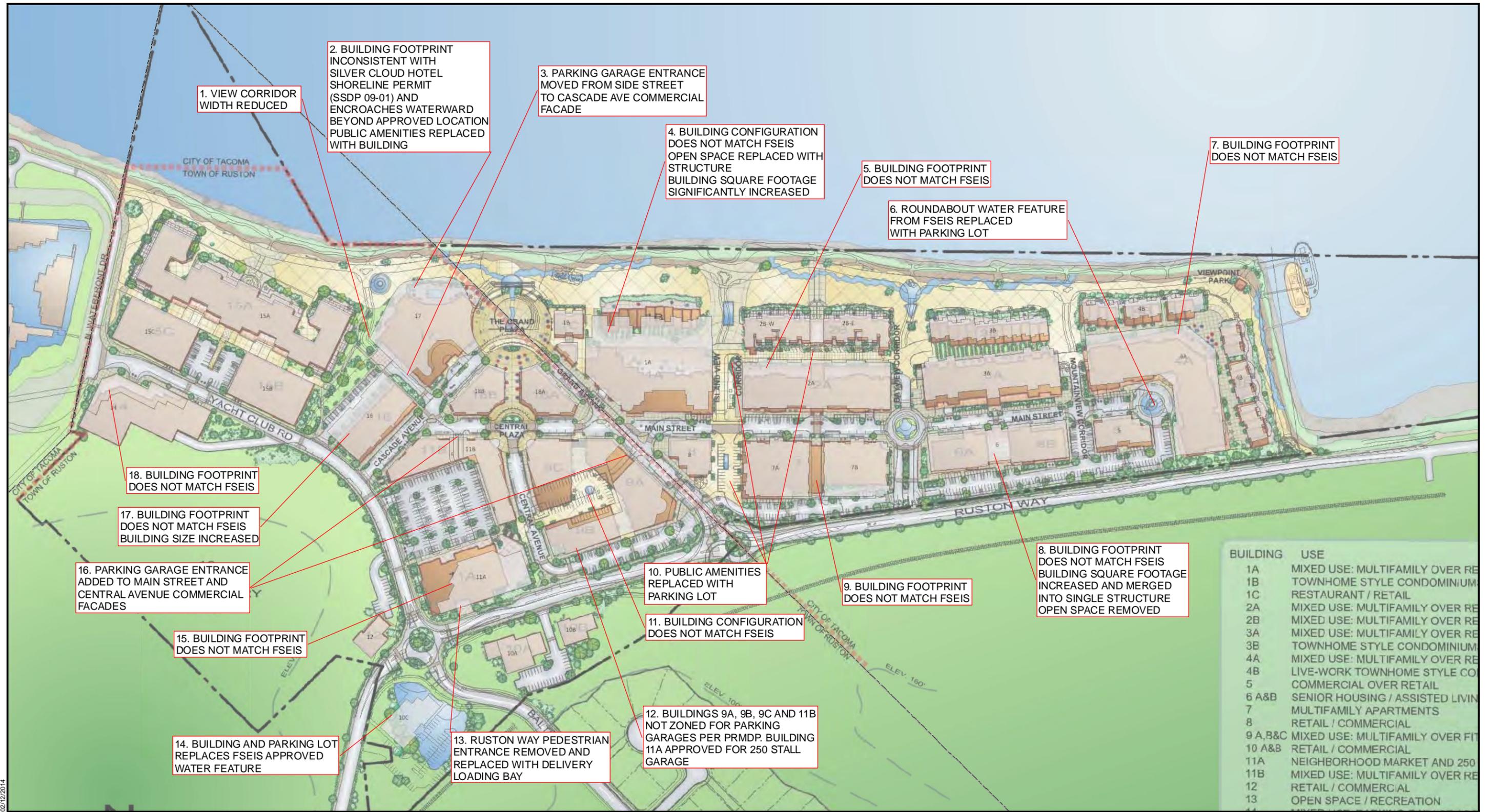
TOWN OF  
RUSTON

CITY OF  
TACOMA

STACK HILL



NOT TO SCALE



1. VIEW CORRIDOR WIDTH REDUCED

2. BUILDING FOOTPRINT INCONSISTENT WITH SILVER CLOUD HOTEL SHORELINE PERMIT (SSDP 09-01) AND ENCROACHES WATERWARD BEYOND APPROVED LOCATION PUBLIC AMENITIES REPLACED WITH BUILDING

3. PARKING GARAGE ENTRANCE MOVED FROM SIDE STREET TO CASCADE AVE COMMERCIAL FACADE

4. BUILDING CONFIGURATION DOES NOT MATCH FSEIS OPEN SPACE REPLACED WITH STRUCTURE BUILDING SQUARE FOOTAGE SIGNIFICANTLY INCREASED

5. BUILDING FOOTPRINT DOES NOT MATCH FSEIS

6. ROUNDABOUT WATER FEATURE FROM FSEIS REPLACED WITH PARKING LOT

7. BUILDING FOOTPRINT DOES NOT MATCH FSEIS

18. BUILDING FOOTPRINT DOES NOT MATCH FSEIS

17. BUILDING FOOTPRINT DOES NOT MATCH FSEIS BUILDING SIZE INCREASED

16. PARKING GARAGE ENTRANCE ADDED TO MAIN STREET AND CENTRAL AVENUE COMMERCIAL FACADES

15. BUILDING FOOTPRINT DOES NOT MATCH FSEIS

14. BUILDING AND PARKING LOT REPLACES FSEIS APPROVED WATER FEATURE

10. PUBLIC AMENITIES REPLACED WITH PARKING LOT

11. BUILDING CONFIGURATION DOES NOT MATCH FSEIS

9. BUILDING FOOTPRINT DOES NOT MATCH FSEIS

8. BUILDING FOOTPRINT DOES NOT MATCH FSEIS BUILDING SQUARE FOOTAGE INCREASED AND MERGED INTO SINGLE STRUCTURE OPEN SPACE REMOVED

12. BUILDINGS 9A, 9B, 9C AND 11B NOT ZONED FOR PARKING GARAGES PER PRMDP. BUILDING 11A APPROVED FOR 250 STALL GARAGE

13. RUSTON WAY PEDESTRIAN ENTRANCE REMOVED AND REPLACED WITH DELIVERY LOADING BAY

BUILDING	USE
1A	MIXED USE: MULTIFAMILY OVER RE
1B	TOWNHOME STYLE CONDOMINIUM
1C	RESTAURANT / RETAIL
2A	MIXED USE: MULTIFAMILY OVER RE
2B	MIXED USE: MULTIFAMILY OVER RE
3A	MIXED USE: MULTIFAMILY OVER RE
3B	TOWNHOME STYLE CONDOMINIUM
4A	MIXED USE: MULTIFAMILY OVER RE
4B	LIVE-WORK TOWNHOME STYLE CO
5	COMMERCIAL OVER RETAIL
6 A&B	SENIOR HOUSING / ASSISTED LIVIN
7	MULTIFAMILY APARTMENTS
8	RETAIL / COMMERCIAL
9 A,B&C	MIXED USE: MULTIFAMILY OVER FIT
10 A&B	RETAIL / COMMERCIAL
11A	NEIGHBORHOOD MARKET AND 250
11B	MIXED USE: MULTIFAMILY OVER RE
12	RETAIL / COMMERCIAL
13	OPEN SPACE / RECREATION

NOTE: THIS MAP REPRESENTS A COMPARISON OF THE APPROVED FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (FSEIS) TO BUILDING FOOTPRINT CONFIGURATIONS REPRESENTED ON RECENT PERMIT SUBMITTALS. MINOR POSITIONAL SHIFT OF BUILDING LAYOUT IS NOT IDENTIFIED AS A DEVIATION FROM THE FSEIS.

FSEIS BUILDING SITE PLAN COMPARISON WITH UNAPPROVED PLAN

CITY OF RUSTON  
SITE PLAN REVIEW SEP 12-05, SPR 13-01

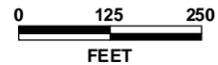
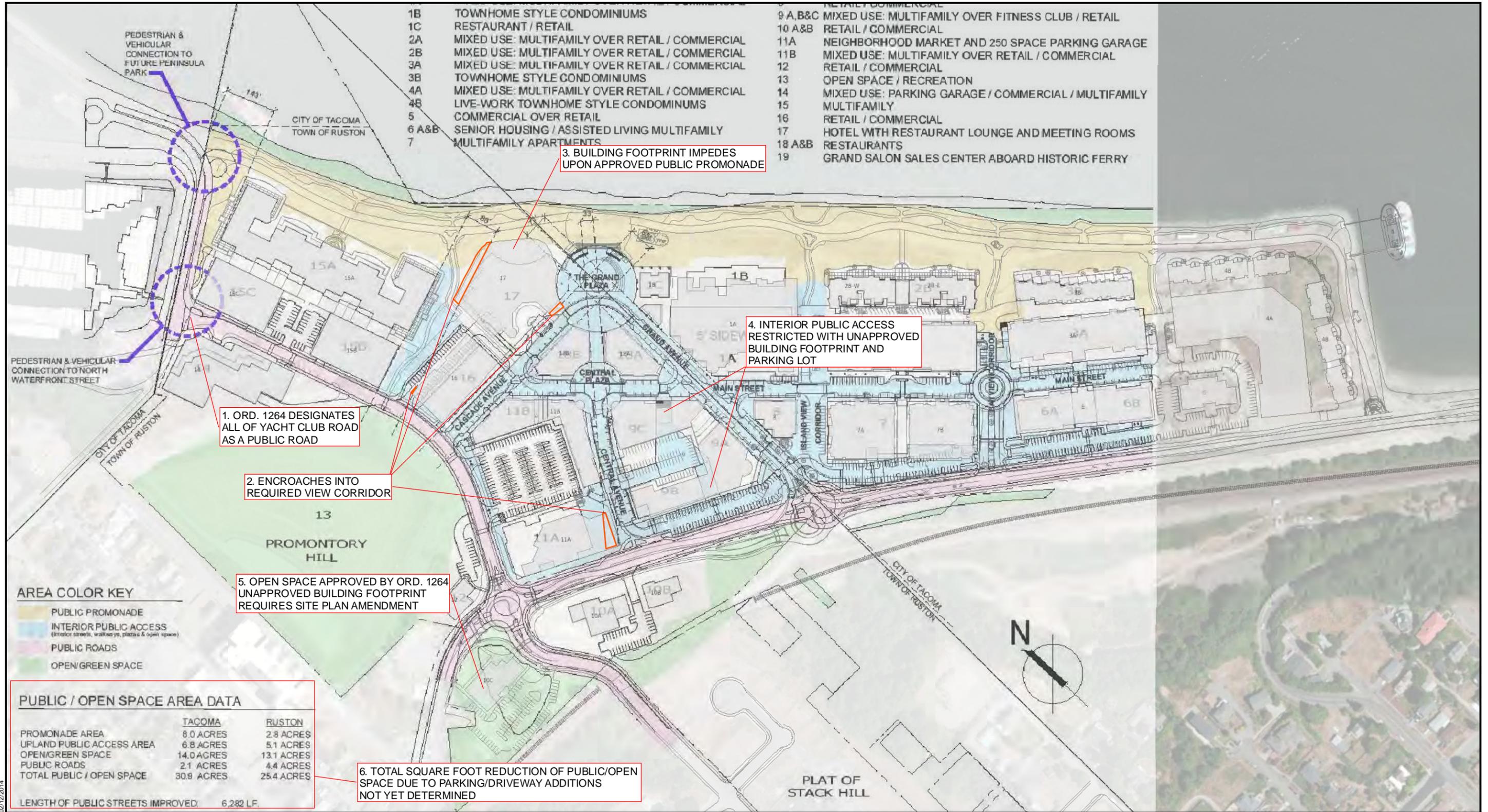


FIGURE  
1

File: X:\Ruston\mxd\FSEIS\_Comparison.mxd 02/12/2014



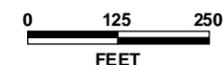
NOTE:  
 THIS MAP REPRESENTS A COMPARISON OF CITY OF RUSTON ORDINANCE 1264 TO BUILDING FOOTPRINT CONFIGURATIONS REPRESENTED ON RECENT PERMIT SUBMITTALS. MINOR POSITIONAL SHIFT OF BUILDING LAYOUT IS NOT IDENTIFIED AS A DEVIATION FROM THE FSEIS.

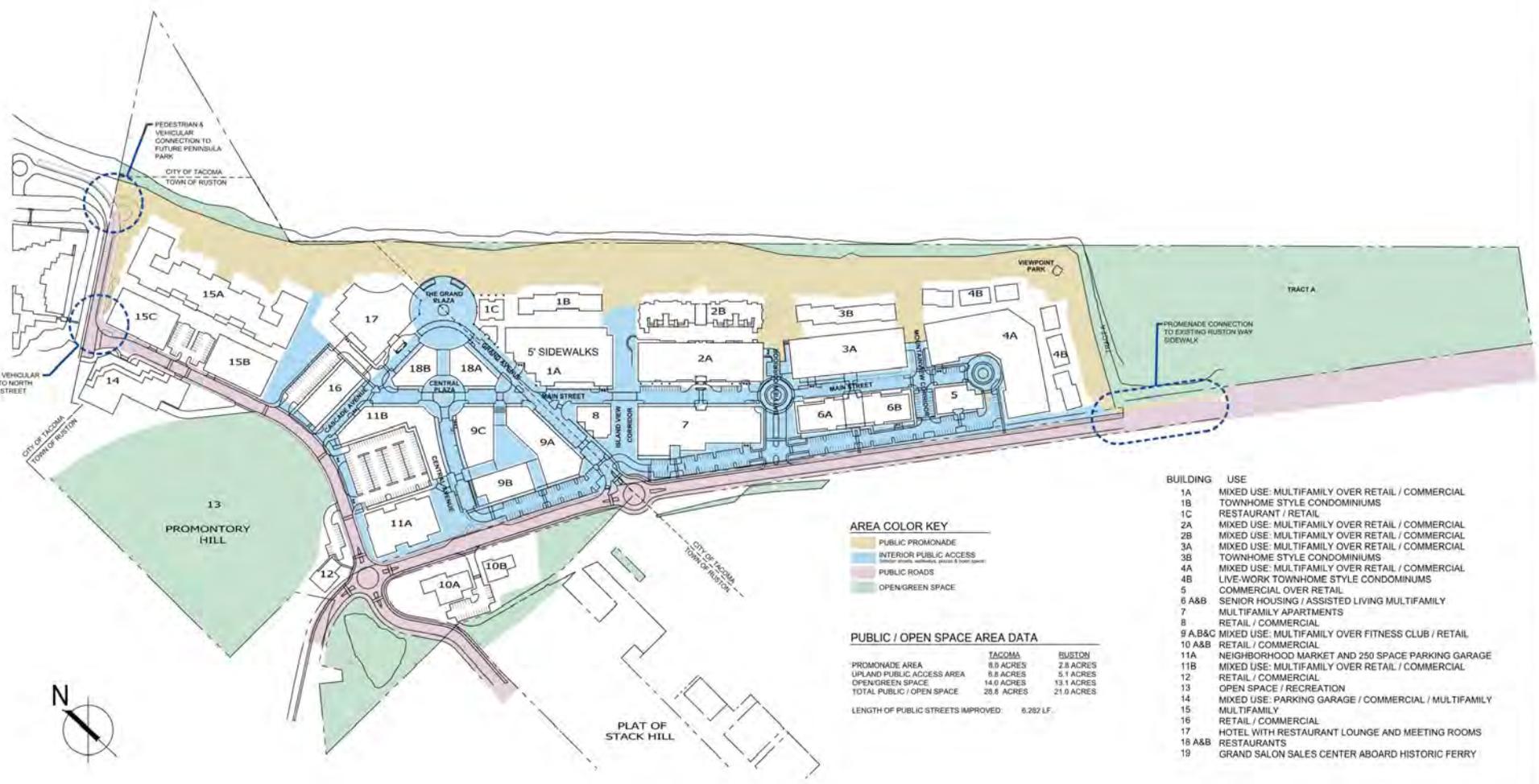
**ORD. 1264 PRMDP COMPARISON WITH UNAPPROVED PLAN**

CITY OF RUSTON  
 SITE PLAN REVIEW SEP 12-05, SPR 13-01



FIGURE  
**2**





**AREA COLOR KEY**

- PUBLIC PROMENADE
- INTERIOR PUBLIC ACCESS
- PUBLIC ROADS
- OPEN GREEN SPACE

**PUBLIC / OPEN SPACE AREA DATA**

	TACOMA	RUSTON
PROMENADE AREA	8.0 ACRES	2.8 ACRES
UPLAND PUBLIC ACCESS AREA	8.8 ACRES	5.1 ACRES
OPEN GREEN SPACE	14.0 ACRES	13.1 ACRES
TOTAL PUBLIC / OPEN SPACE	28.8 ACRES	21.0 ACRES

LENGTH OF PUBLIC STREETS IMPROVED: 8,282 LF.

BUILDING	USE
1A	MIXED USE: MULTIFAMILY OVER RETAIL / COMMERCIAL
1B	TOWNHOME STYLE CONDOMINIUMS
1C	RESTAURANT / RETAIL
2A	MIXED USE: MULTIFAMILY OVER RETAIL / COMMERCIAL
2B	MIXED USE: MULTIFAMILY OVER RETAIL / COMMERCIAL
3A	MIXED USE: MULTIFAMILY OVER RETAIL / COMMERCIAL
3B	TOWNHOME STYLE CONDOMINIUMS
4A	MIXED USE: MULTIFAMILY OVER RETAIL / COMMERCIAL
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16	RETAIL / COMMERCIAL
17	HOTEL WITH RESTAURANT LOUNGE AND MEETING ROOMS
18 A&B	RESTAURANTS
19	GRAND SALON SALES CENTER ABOARD HISTORIC FERRY



**L. Promontory Hill Park:**

1. MTP Level of Service for a "Neighborhood Park"
2. Dedicated park open space
3. Children's play area, large open field, picnic shelters, interpretive signage, open grass field suitable for a sports field
4. General site enhancements

**G. Roundabout Open Space:**

1. Realignment of Ruston Way provides two main entrance points into Point Ruston
2. Green open space within their central islands
3. Ruston Entry Sign/Tacoma exit sign

**H. Island View Corridor**

1. Unobstructed view from Ruston Way to the shoreline and beyond
2. Public Pedestrian and vehicular access from Ruston Way, through the Point Ruston development
3. Allowing pedestrian access to the Promenade
4. Upgraded walkways and amenities

**B. Pedestrian Connection to Ruston Way explained**

1. Promenade Enhancements

**BUILDING USE**

- 1A MIXED USE MULTIFAMILY OVER RETAIL / COMMERCIAL
- 1B TOWNHOME STYLE CONDOMINIUMS
- 1C RESTAURANT / RETAIL
- 2A MIXED USE MULTIFAMILY OVER RETAIL / COMMERCIAL
- 2B MIXED USE MULTIFAMILY OVER RETAIL / COMMERCIAL
- 3A MIXED USE MULTIFAMILY OVER RETAIL / COMMERCIAL
- 3B TOWNHOME STYLE CONDOMINIUMS
- 4A MIXED USE MULTIFAMILY OVER RETAIL / COMMERCIAL
- 4B LIVE/WORK TOWNHOME STYLE CONDOMINIUMS
- 5A MIXED USE MULTIFAMILY OVER RETAIL / COMMERCIAL
- 6 A&B SENIOR HOUSING / ASSISTED LIVING MULTIFAMILY
- 7 MULTIFAMILY APARTMENTS
- 8 RETAIL / COMMERCIAL
- 9 A,B&C MIXED USE MULTIFAMILY OVER FITNESS CLUB / RETAIL
- 10 A&B RETAIL / COMMERCIAL
- 11A NEIGHBORHOOD MARKET AND 250 SPACE PARKING GARAGE
- 11B MIXED USE MULTIFAMILY OVER RETAIL / COMMERCIAL
- 12 RETAIL / COMMERCIAL
- 13 OPEN SPACE / RECREATION
- 14 MIXED USE PARKING GARAGE / COMMERCIAL / MULTIFAMILY
- 15 MULTIFAMILY
- 16 RETAIL / COMMERCIAL
- 17 RESTAURANT LOUNGE AND MEETING ROOMS
- 18 A&B RESTAURANTS
- 19 GRAND SALON SALES CENTER ABOARD HISTORIC FERRY

**K. Pedestrian Connection to Metro Parks Property**

1. Pedestrian/Bike public right of way connecting Ruston Way to the Yacht Club basin
2. Access to the Metro Parks Peninsula Park property and Point Defiance property, through the Point Ruston development, connecting the "missing link"

**J. Ruston "Entry Sign"/ "Tacoma Exit Sign"**

1. Upgraded signage indicating jurisdiction line

**I. Grand Promenade Roundabout:**

1. Publicly open and accessible, raised Grand Promenade Roundabout
2. Highly styled public roundabout area
3. Central fountain, public seating areas, view terraces
4. Access to the hotel, commercial, and retail core area

**F. Bay View Corridor**

1. Unobstructed view from Ruston Way to the shoreline and beyond
2. Public Pedestrian and vehicular access from Ruston Way, through the Point Ruston development
3. Allowing pedestrian access to the Promenade
4. Upgraded walkways and amenities

**E. Bear Fountain Public Art**

1. Public Seating Area
2. Public Art

**D. Mountain View Corridor**

1. Unobstructed view from Ruston Way to the shoreline and beyond
2. Public Pedestrian and vehicular access from Ruston Way, through the Point Ruston development
3. Allowing pedestrian access to the Promenade
4. Upgraded walkways and amenities

**C. Point Ruston View Point Park:**

1. Expanded section of the Promenade
2. Views towards the City, Mt. Rainier, and the Port.
3. Approximately 20,000 square feet

Central gathering place feature a focal piece of public art

**A. Point Ruston Promenade**

1. Run contiguously from the southern tip of the property all the way to the most northern point of the property
2. Approximately 4045' lineal fee - approximately 1/4 of a mile in length
3. Averaging 100 ft. in width along entirety
4. Full Public access to entire Promenade
5. Connect to the existing Ruston Way public walkway within the City of Tacoma and extend almost 1/2 of a mile into the Town of Ruston
6. Public access to the approximately 9.2 acres of shoreline.
7. Composed of several surfaces
  - a. Continuous hardscape to accommodate wheeled pedestrians
  - b. Meandering sand substrate for joggers

Source: ESM, 2008

