

Hilltop Subarea Plan Final Planned Action Environmental Impact Statement



Tacoma, Washington
December 2013

This document serves as the Final Planned Action Environmental Impact Statement (FEIS) for the Hilltop Subarea Plan for Tacoma, Washington, and includes descriptions of the existing environment, alternative plan impacts, and mitigation.

The Hilltop Subarea Plan including plan objectives, action plan elements, and implementation program is described in a separate document.

Reference copies of the proposed Hilltop Subarea Plan are available for review at the Tacoma Public Library and Tacoma City Hall.

Prepared in compliance with:

The Washington State Environmental Policy Act (SEPA) of 1971
Chapter 43.21C of Revised Code of Washington (RCW) revised 1983

SEPA Guidelines, Effective 16 January 1976 as revised 4 April 1984
Chapter 197-10, Washington Administrative Code (WAC)

Tacoma SEPA Ordinance Number TMC Chapter 13.12

Date issue Draft Environmental Impact Statement: **30 November 2012**

Date issue Final Environmental Impact Statement: **31 December 2013**

Notice of Issuance on December 31, 2013 of Final Planned Action Environmental Impact Statement Hilltop Subarea Plan Tacoma, Washington



This notice of availability is provided in accordance with the Washington State Environmental Policy Act (SEPA) of 1971, Chapter 43.21C of the Revised Code of Washington (RCW) as revised 1983, and SEPA Guidelines, Effective 16 January 1976 as revised 4 April 1984, Chapter 197-10, Washington Administrative Code (WAC). Tacoma, Washington has issued a Final Planned Action Environmental Impact Statement (FEIS) for the Hilltop Subarea Plan.

Description of the Proposal:

The proposed plan will supplement current Tacoma policies governing the environment, land use, economics, transportation, design resources, parks and recreation, public services, and utilities to implement the Hilltop Subarea Plan and to conform to GMA requirements.

Implementation actions will revise zoning and apply organizational approaches, economic and business recruitment, arts and cultural promotions, historical preservation objectives,

complete street typologies including streetcar, bike, and pedestrian plans and projects, sustainability measures, and initiate catalytic projects for city and privately owned key properties, among other measures.

Location of the proposal

The Hilltop Subarea is centered on Martin Luther King Jr (MLK) Way from Division Avenue to south of South 23rd Street, and to the west of South I Street/Yakima Avenue from Division Street to South 27th Street. The Hilltop Subarea extends a half block west from MLK except in the Hilltop Mixed-use Center where it extends west to Sheridan Avenue along South 11th Street. The Hilltop Subarea includes approximately 271 acres and acts as a major gateway into downtown Tacoma and its historic brewery district.

The Hilltop Subarea's major institutions include MultiCare Health System's Mary Bridge Children's and Tacoma Hospital in the north end of the Subarea between Division Avenue and South 6th Avenue, Group Health Tacoma Medical Center at MLK Jr Way and Division Avenue, the Franciscan Health System's St Joseph Medical Center on South J Street between South 16th and 19th Streets, Community Health Care's new facility at MLK Jr Way and South Earnest Brazill Street, Evergreen State College Tacoma on 6th Avenue, and McCarver Elementary School on South J Street, among others.

Purpose of Hilltop Subarea Plan

The purpose of the Hilltop Subarea Plan is to anticipate and guide the long-term redevelopment of the Hilltop Subarea. The plan will serve as a statement of the city's commitment and direction for the subarea and as a resource for potential investors, property owners, the community, and other public agencies.

The Hilltop Subarea Plan's contents and implementing actions retain some existing land use activities as well as recruit new and intensified mixed use developments along with walkways and trails, roadway reconfigurations, and other infrastructure improvements.

Key objectives include creating an updated brand and image for the Hilltop district; recruiting new business and employment activities; establishing new gateway entries to the Hilltop district by installing signage, streetscapes, and other amenities; and initiating development of new mixed use projects with which to create a sustainable community where residents may live, work, and play in Hilltop; among others.

Action sponsor

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

Lead agency

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

Proposed date of implementation

The Hilltop Subarea Plan's planning period extends 20 years or from 2014 to the year 2034. The Plan proposes revisions to zoning along with 19 goals and 80 implementing actions. Implementation will commence beginning with the adoption of the Hilltop Subarea Plan by the Tacoma City Council.

Availability of the FEIS Document

Copies of the Hilltop Subarea Plan, Planned Action Ordinance, Draft Planned Action Environmental Impact Statement (DEIS), and Final Environmental Impact Statement (FEIS) are available for public review at:

- City of Tacoma Planning & Development Services Department, 747 Market Street, Room 345 and
- Tacoma Public Library located at 1102 Tacoma Avenue South.

The complete Hilltop Subarea Plan, Draft Planned Action Environmental Impact Statement (DEIS) and Appendices (with Planned Action Ordinance), and Final Environmental Impact Statement (FEIS) can be downloaded from the Tacoma website at:

www.cityoftacoma.org/HilltopPlan

The document may also be acquired on CD at City of Tacoma Planning & Development Services Department, 747 Market Street, Room 345

Questions regarding the proposed Hilltop Subarea Plan & Implementing Regulations should be addressed to:

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Fact Sheet

Proposed action

Adopt and implement the Hilltop Subarea Plan for Tacoma, Washington in accordance with Chapter 35.63 of the Revised Code of Washington (RCW) and the provisions of the Growth Management Act (GMA), Chapter 36.70A of the Revised Code of Washington (RCW).

The proposed plan will augment current Tacoma policies governing the environment, land use, economics, transportation, design resources, parks and recreation, public services, and utilities to implement the Hilltop Subarea Plan and to conform to GMA requirements.

Implementation program particulars will update zoning, design standards, capital improvement program, and other Tacoma ordinances and regulations to comply with the Hilltop Subarea Plan's policies and implementing measures.

Location of the proposal

The Hilltop Subarea is centered on Martin Luther King Jr (MLK) Way from Division Avenue to south of South 23rd Street, and to the west of I Street/Yakima Avenue from Division Street to South 27th Street. The Hilltop Subarea extends a half block west from MLK except in the Hilltop mixed use center where it extends west to Sheridan Avenue along South 11th Street. The Hilltop Subarea includes approximately 165.51 acres not including public rights-of-way and public facilities and acts as a major gateway into downtown Tacoma and its historic brewery district.

The Hilltop Subarea contains some major institutions including MultiCare Health System's Mary Bridge Children's and Tacoma Hospital on the north between Division Avenue and South 6th Avenue, and the Franciscan Health System's St Joseph Medical Center on South J Street between South 16th and 19th Streets.

Purpose of Hilltop Subarea Plan

The purpose of the Hilltop Subarea Plan is to anticipate and guide the long-term redevelopment of the Hilltop Subarea including the mixed use center, hospitals, and residential neighborhoods. The plan will serve as a statement of the city's commitment and direction for these areas and as a resource for potential investors, property owners, the community, and other public agencies.

Hilltop Subarea Plan contents retains some existing land use activities as well as recruits new and intensified commercial and residential

mixed use developments along with walkway and trail expansions, roadway reconfigurations, and other infrastructure improvements.

Key objectives include establishing new gateway entries to the Hilltop Subarea as well as enhanced connections between the district, downtown, and city, by refurbishing signage, streetscapes, and other amenities.

Renaming of the Hilltop Subarea Plan

One of the proposed actions that was developed during the Subarea planning public process was to rename the MLK Mixed-Use Center to the Hilltop Mixed-Use Center. As a result, the name of the Draft MLK Subarea Plan was updated to "Hilltop Subarea Plan" for the final version of the Subarea Plan and Final EIS.

Action sponsor

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Lead agency

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Tacoma, WA 98402

Proposed date of implementation

The Hilltop Subarea Plan's planning period extends 20 years or from 2014 to the year 2034. Implementing actions include proposals to revise zoning, develop form-based urban design guidelines, implement historic transfer of development rights (TDR), among others. Implementation will commence beginning with the adoption of the Hilltop Subarea Plan by the Tacoma City Council.

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Required approvals

The following actions must be approved by Tacoma City Council in order to implement Alternative 2: Hilltop Subarea Plan:

- The proposed Hilltop Subarea Plan and all implementing measures including amendments to the Zoning Map and Planned Action Ordinance must be reviewed at public hearings to be conducted by the Tacoma Planning Commission, and thereafter by City Council in accordance with the provisions of Chapter 35.63 and the Washington State Growth Management Act (GMA) Chapter 36.70A of the Revised Code of Washington (RCW).
- Tacoma City Council must complete public hearings, consider the recommendations of the Planning Commission and public, and adopt a final Hilltop Subarea Plan, implementing measures including zoning map amendments, and Planned Action Ordinance.

Commencing with the City Council's adoption of a final Hilltop Subarea Plan, implementing measures including zoning map amendments and Planned Action Ordinance, various Tacoma agencies will initiate the specific actions consistent with the provisions of Chapter 35.63 and 36.70A of the RCW.

- Prior to Tacoma action, the Washington State Department of Commerce (DOC) will coordinate state agency review.

Following City Council action, the likely permits to be acquired by individual development proposals include but are not limited to:

- Land use permits
- Construction permits
- Building permits
- Street occupancy permits

Planned Action EIS & Ordinance

Washington State Environmental Policy Act (SEPA) provides for a Planned Action process to allow quality environmental review early in the planning process and with public input to shape decisions. The intent is to provide more detailed environmental analysis during the formulation of planning proposals, rather than at the project permit stage.

The basic steps in designating planned action projects are to:

- Prepare an environmental impact statement (EIS),
- Designate the planned action projects by ordinance, and
- Review permit applications for consistency with the designated planned action.

No additional SEPA review will be required for site specific development that is proposed within the Subarea if it (1) is consistent with the Hilltop Subarea Plan, (2) is consistent with the "Planned Action" ordinance enacted by the City Council, and (3) vests within 10 years of issuance of the Final EIS. After 10 years of issuance of the Final EIS, no additional SEPA review will be required for site specific development that is proposed within the Subarea if it (1) is consistent with the Hilltop Subarea Plan, (2) is consistent with the "Planned Action" ordinance enacted by the City Council, (3) is not an essential public facility, and (4) vests within 30 years of the issuance of the Final EIS.

In addition, no additional SEPA review will be required for site specific development that is proposed within the Subarea if it is exempt under an "infill exemption" ordinance adopted by the City under RCW 43.21.229.

If development deviates substantially from what is envisioned in this EIS, subsequent site-specific environmental review may be necessary; development regulation agreements pursuant to TMC 13.05.095 are by definition not

to be considered as substantial deviations. In addition, certain mitigation measures considered in the Subarea Plan may not be adopted, in which case development may occur without the benefit of the proposed mitigations.

The Planned Action Ordinance (PAO) is expected to encourage redevelopment and revitalization within the Hilltop Subarea. Property owners and potential developers will be encouraged to redevelop in the Hilltop Subarea as a result of the streamlined development process that takes place under a planned action process. This EIS will help Tacoma identify impacts of development and specific mitigation measures that developers will have to meet to qualify for a Planned Action project.

**Date of issue of Draft Planned Action
Environmental Impact Statement (DEIS)**
30 November 2012

**Comments due on Draft Planned Action
Environmental Impact Statement (DEIS)**
17 February 2013

**Date of issue of Final Planned Action
Environmental Impact Statement (FEIS)**
31 December 2013

**Availability of the FEIS and Related
Documents**

Copies of the Hilltop Subarea Plan, Planned Action Ordinance, Draft Planned Action Environmental Impact Statement (DEIS), and Final Environmental Impact Statement (FEIS) are available for public review at:

- City of Tacoma Planning & Development Services Department, 747 Market Street, Room 345 and
- Tacoma Public Library located at 1102 Tacoma Avenue South.

The Draft MLK Subarea Plan, Final Hilltop Subarea Plan, Draft Planned Action Environmental Impact Statement (DEIS), and Final Environmental Impact Statement (FEIS) can be downloaded from the City of Tacoma website at:

www.cityoftacoma.org/HilltopPlan

Documents may also be acquired on CD at City of Tacoma Planning & Development Services Department, 747 Market Street, Room 345.

1 Summary of the proposal

Adopt and implement the Hilltop Subarea Plan & implementing measures for Tacoma, Washington in accordance with Chapter 35.63 of the Revised Code of Washington (RCW) and the provisions of the Washington State Growth Management Act (GMA) Chapter 36.70A of the Revised Code of Washington (RCW).

1.1: Alternatives

The following alternatives have been considered on a Hilltop area-wide basis:

- **Alternative 1: No-action** - where the goals, objectives, concepts, policies, and regulations in the existing June 2011 Comprehensive Plan and Zoning Map and Ordinance are not changed.
- **Alternative 2: Hilltop Subarea Plan - the Proposed Action** - where environmental, parks and open spaces, land use and zoning, population and housing, road network, on-road bike lanes, pedestrian walkways and sidewalks, streetscapes, gateways and wayfinding, transit routes, catalytic public, catalytic private development projects, and a variety of partnership or joint ventures are potentially entered into with nonprofit and other public agencies to implement the plan.

1.2: The proposed action

Implementation of Alternative 2: Hilltop Subarea Plan - the Proposed Action will comply with GMA requirements for comprehensive plan amendments, zoning map and ordinance revisions, and a capital facilities program. In addition, the program will also develop and implement the following actions determined to be important in effectively implementing the Hilltop Subarea Plan.

The Plan's 80 Actions are grouped according to 19 Goals under five general topics, and are listed in Table 1 at the end of this section.

1.3: Elements of the environment - Impacts and mitigating measures

In accordance with WAC 197-11-44, the Tacoma Community Development & Planning Department has determined this proposal may have a significant adverse impact on the

following topics if not properly planned and mitigated as described in the following pages.

1.3.1: Physical environment

1.3.1.1: Earth

Environmental impacts - both alternatives will clear and grade vacant and underdeveloped land in the Hilltop Subarea. Higher intensity urban development could erode soils and enter surface water runoff degrading the quality of surface water bodies if not properly managed.

Both alternatives will result in a significant increase in development densities within the Subarea, including residential, commercial, institutional and mixed-use structures up to 5, 8 and 12 floors or more through an incentive zoning program that requires provision of public benefit features, such as pedestrian and transit-oriented elements, structured parking, sustainability features, affordable housing, and Transfer of Development Rights (TDR).

Both alternatives will encourage the development of slightly recessed parking decks which will potentially excavate and remove more soil than would occur under surface parking solutions.

Mitigating measures - the amount of clearing and grading of soils and earth under Alternative 2: Hilltop Subarea Plan will not be different than what is currently allowed under Alternative 1: No-Action Alternative.

Tacoma development codes and regulations mandate measures that will control and reduce erosion and runoff during construction.

1.3.1.2: Air

Environmental impacts - both alternatives will develop vacant and underdeveloped lands within the Hilltop Subarea increasing associated automobile traffic and construction activities. Additional urban activities and accompanying automobile traffic will produce and increase suspended particulate (PM₁₀), ozone (o₃), and carbon monoxide (CO) content within the local area.

Both alternatives will result in a significant increase in development densities within the Subarea, including residential, commercial,

institutional and mixed-use structures up to 5, 8 and 12 floors or more through an incentive zoning program that requires provision of public benefit features, such as pedestrian and transit-oriented elements, structured parking, sustainability features, affordable housing, and Transfer of Development Rights (TDR). Increased population and employment may result in increased total automobile use in the Subarea.

Mitigation measures – both alternatives will create a mixed use community with more local retail, service, office, and other employment and recreation activities within the Hilltop Subarea reducing the amount of automobile traffic that would be associated under a continuation of existing conditions.

Alternative 2: Hilltop Subarea Plan will develop more multipurpose trails, bike lanes, pedestrian sidewalks and streetscapes, and a shuttle rubber-tire, streetcar, or light rail transit loop with the downtown providing more alternative and less air impacting transportation options than under Alternative 1: No-Action.

Specifically, Alternative 2: Hilltop Subarea Plan will implement the following measures to mitigate impacts on air and GHG conditions by reducing vehicular traffic and particulate matter (PM), carbon monoxide (CO), and ozone (O3) air pollution potentials:

NR-1.3: Economic sustainability – recruit businesses that employ technical, professional, and managerial skills offered by and/or able to be developed for Hilltop residents to facilitate live/work sustainability in Hilltop.

NR-6.1: Housing options – increase housing choice by type, price, tenure, and location to house a mixed age, household, and income population in or near employment centers, transit corridors, and recreational sites to provide increased live/work/play opportunities in the Hilltop area.

NR-6.2: Affordable housing – award additional density, reduced parking requirements, reduced permit fees, and/or other measures for new housing projects that promote rental and sale workforce housing for moderate income working households employed or resident within Hilltop.

M-2.1: Initiate a City program to create a prioritized list of pedestrian crossing improvements in Hilltop along with a plan for implementing the improvements.

M-2.2: Initiate a City program to create a prioritized list of pedestrian connector improvements in Hilltop along with a plan for implementing the improvements.

M-3.1: Implement the City's proposed active bicycle infrastructure projects in Hilltop as identified in the Mobility Master Plan, and prioritize the South J Street Bicycle Boulevard.

M-4.2: Implement Complete Streets reconfigurations of Hilltop streets based on a priority that focuses on the MLK Jr Way business district.

M-5.1: Streetcar (LINK) – Continue to support the selection of the North Downtown Central Corridor (E1) alternative for the Sound Transit LINK light rail extension.

M-5.5: Pierce Transit – retain and expand Pierce Transit's schedules and stops to include hours and routes that support Hilltop district employees and residents, particularly at MultiCare and Franciscan Health System's Hospitals, Community Health Care and within the business district core.

1.3.1.3: Water

Environmental impacts – both alternatives will replace existing vacant and underdeveloped land with structures, roadways, and other hard surfaces thereby increasing the quantity of surface water runoff within the underground stormwater collection system that ultimately discharges into the Thea Foss Waterway and Puget Sound. However, since most of the Subarea is already developed with impervious surface, the quantity of additional runoff caused by either alternative will be relatively small.

The amount of new impervious surfaces created under Alternative 2: Hilltop Subarea Plan will not be different than what is currently allowed under Alternative 1: No-Action.

Mitigation measures – Alternative 2: Hilltop Subarea Plan will encourage pervious surfaces in parking and trail surfaces, green roofs on new building developments, and increased stormwater bio-filtration systems in Complete Street reconfigurations, which will not increase the amount of stormwater runoff over what the current system has been designed to collect and discharge.

Tacoma development codes and regulations mandate measures during construction that will

control and reduce erosion and runoff during construction.

Specifically, Alternative 2: Hilltop Subarea Plan will implement the following measures to mitigate impacts on water conditions:

OS-2.1: Stormwater – develop rain gardens, green roofs and walls, bio-filtration swales, and other green development features in and around the Hilltop Subarea’s public facilities and within the Hilltop area’s Complete Streets as well as in new project developments.

OS-2.2: Develop partnerships and seek funding from the City of Tacoma Public Works Department, the Center for Urban Waters, Citizens for a Healthy Bay, the Puget Sound Partnership, the Department of Ecology, the U.S. EPA, and other organizations to develop natural drainage features in existing and planned open spaces.

OS-2.3: Native habitat – plant street trees, reforest open spaces, remove invasive species, and promote use of native and drought resistant plants to restore wildlife habitat in and around Hilltop’s public facilities and within Hilltop’s Complete Street corridors.

CP-3.2: Brownfields – identify all known sites of hazardous materials including former gas stations and laundries, develop appropriate mitigation strategies, and create a funding source for proactively mitigating the sites to support redevelopment.

1.3.1.4: Plants and animals

Environmental impacts – both alternatives will replace existing vacant and underdeveloped land with structures, roadways, and other hard surfaces thereby reducing the amount of existing natural vegetation and open ground for wildlife habitat. However, since most of the Subarea is already developed with impervious surface, any such reductions will be relatively small.

Mitigation measures - Alternative 2: Hilltop Subarea Plan will install native plant materials in Complete Street stormwater swales and buffers to provide bio-filtration of stormwater, improve habitat, and enhance visual impacts.

Alternative 2: Hilltop Subarea Plan will also install native plant materials to restore vegetation of habitat significance in

streetscapes, rain gardens, and other landscaping.

Specifically, Alternative 2: Hilltop Subarea Plan will implement the following measures to mitigate impacts on plant and animal conditions:

OS-1.3: designate a system of coordinated open spaces, conservation corridors, greenways and green streets to link Hilltop parks and community facilities, and connect the Hilltop district to adjacent neighborhoods, the Prairie Line Trail, UW Tacoma and the Thea Foss Waterway.

OS-1.4: Community gardens – plant community or pea patch gardens on vacant sites as well as other available lands within Hilltop to restore habitat, grow healthy foods for local use, and improve visual appearances, in some cases to serve as temporary uses on sites waiting for redevelopment.

OS-2.1: Stormwater – develop rain gardens, green roofs and walls, bio-filtration swales, and other green development features in and around the Hilltop subarea’s public facilities and within the Hilltop area’s Complete Streets as well as in new project developments.

OS-2.3: Native habitat – plant street trees, reforest open spaces, remove invasive species, and promote use of native and drought resistant plants to restore wildlife habitat in and around Hilltop’s public facilities and within Hilltop’s Complete Street corridors.

CP-3.2: Brownfields – identify all known sites of hazardous materials including former gas stations and laundries, develop appropriate mitigation strategies, and create a funding source for proactively mitigating the sites to support redevelopment.

1.3.2: Built environment

1.3.2.1: Relationship to existing plans and policies

Environmental impacts – both alternatives will continue infill and redevelopment of the lands within the Hilltop Subarea for urban uses and activities to higher intensities as a neighborhood center in accordance with policies for concentrating growth within urban mixed use centers in GMA, PSCR, PCRC, and Tacoma’s Comprehensive Plan.

Both alternatives will generally retain the Hilltop Neighborhood Mixed-Use Center zoning

designations allowing higher densities for infill and redevelopment lands in accordance with Tacoma's Comprehensive Plan and the policies defined in the Central and New Tacoma Neighborhood Element policies.

Mitigation measures – both alternatives will comply or mitigate the application of GMA, PSRC, PCRC, and Tacoma's Comprehensive Plan Central and New Neighborhood Elements under the following provisions:

- Tacoma's Comprehensive Plan will be updated in 2015 in accordance with GMA requirements providing the Hilltop Subarea an opportunity to fine tune subarea strategies and particulars based on performance.
- All development regulations within Tacoma and the Hilltop Subarea match with each other including the Comprehensive Plan, Zoning, Subdivisions, the Critical Areas Ordinance, the Shoreline Master Plan, and all other city regulations as contained in the Tacoma Municipal Code and other adopted plans.

Alternative 2: Hilltop Subarea Plan will implement PSRC Vision 2040, PCRC, Tacoma, and Central and New Tacoma Neighborhood policies for concentrating future growth within urban mixed use centers in accordance with the following sequence of PCRC CWPP goals through the following actions:

Affordable housing

NR-6.1: Housing options – increase housing choice by type, price, tenure, and location to house a mixed age, household, and income population in or near employment centers, transit corridors, and recreational sites to provide increased live/work/play opportunities in the Hilltop area.

NR-6.2: Affordable housing – award additional density, reduced parking requirements, reduced permit fees, and/or other measures for new housing projects that promote rental and sale workforce housing for moderate income working households employed or resident within Hilltop.

Community and urban design

LU-1.5: Ground floor retail requirements – designate Pedestrian Street mixed use ground floor retail requirements to reflect market capacity and desired concentrated retail corridor locations, with a focus on MLK Jr. Way

and South 11th Street in the business district core.

LU-1.6: Design standards – create and adopt a design overlay for the district that utilizes a hybrid “form-based” approach that illustrates building and street-level design objectives using examples to better address historic character, pedestrian vibrancy, compatibility and design quality issues within a flexible administrative procedure that recognizes innovation.

Economic development and employment

NR-1.3: Economic sustainability – recruit businesses that employ technical, professional, and managerial skills offered by and/or able to be developed for Hilltop residents to facilitate live/work sustainability in Hilltop.

NR-1.4: Medical and health sector – retain and recruit businesses that support and can expand the health related services and products offered by the MultiCare and Franciscan Health Systems and Community Health Care as well as the growth of these institutions proper in the Hilltop area.

NR-1.5: Education sector – retain and recruit businesses that can support and expand on the opportunities created by the association of UW Tacoma, Evergreen State College Tacoma, and Bates Technical College with Hilltop subarea business and employment development potentials.

NR-5.1: Education – expand school/community relations to include volunteer mentor and peer group support with the participation of the Tacoma Public Schools, Tacoma Housing Authority, UW Tacoma, Evergreen State College Tacoma, Bates Technical College, and others to improve educational opportunities, test scores, and the reputation of McCarver School in the community and marketplace.

NR-5.2: Employment – create a youth job placement service offering part and full-time internships and employment opportunities with Hilltop businesses and organizations for area youth.

Health and well being

OS-1.3: designate a system of coordinated open spaces, conservation corridors, greenways and green streets to link Hilltop parks and community facilities, and connect the Hilltop district to adjacent neighborhoods, the Prairie Line Trail, UW Tacoma and the Thea Foss Waterway.

M-2.1: Initiate a City program to create a prioritized list of pedestrian crossing improvements in Hilltop along with a plan for implementing the improvements.

M-2.2: Initiate a City program to create a prioritized list of pedestrian connector improvements in Hilltop along with a plan for implementing the improvements.

M-3.1: Implement the City's proposed active bicycle infrastructure projects in Hilltop as identified in the Mobility Master Plan, and prioritize the South J Street Bicycle Boulevard.

Historic, archaeological, and cultural preservation

NR-2.2: Design - redefine the Hilltop brand to include arts and historical based themes and install artworks, gateways, way-finding signage, walking tours, maps, and streetscape at the entrances into and of significant landmarks in Hilltop.

NR-4.1: Art and history walking tours - sign and create audio and phone apps for walking tours of Hilltop historical sites, buildings, and other visually interesting and significant landmarks for local recognitions as well as for historical tourist attractions.

NR-4.2: Preservation of key historic resources - complete the ongoing city-wide historic resources inventory and then conduct a focused evaluation of and community discussion about historic buildings within the Hilltop district to identify the most critical buildings to be retained and explore incentives, such as historical transfer of development rights (TDR), and regulatory tools to support their preservation and continued use.

NR-4.3: Artist live/work - develop affordable artist live-work-teach-display-sell galleries and workshops as well as live-work housing opportunities to retain and attract young and emerging talent in Hilltop.

NR-4.4: Farmers/Public Market - establish a seasonal and possibly year-round farmers/public market with all-weather structures, available parking, and increased visibility to provide expanded access to locally-produced and healthy foods, serve residents and attract out-of-area customers into the Hilltop district.

Transportation facilities and strategies

M-4.2: Implement Complete Streets reconfigurations of Hilltop streets based on a

priority that focuses on the MLK Jr Way business district.

M-5.1: Streetcar (LINK) - Continue to support the selection of the North Downtown Central Corridor (E1) alternative for the Sound Transit LINK light rail extension.

M-5.5: Pierce Transit - retain and expand Pierce Transit's schedules and stops to include hours and routes that support Hilltop district employees and residents, particularly at MultiCare and Franciscan Health System's Hospitals, Community Health Care and within the business district core.

Urban growth areas (urban centers)

CP-1.6: Hospital planning and coordination - work with MultiCare and Franciscan Health Systems and any other significant, campus-like institutions to evaluate more collaborative processes with the city and community, such as development agreements, to better define and support the long-range needs of these institutions, mitigate future development impacts as appropriate, and address how such future development can allow institutions to participate in the revitalization of the Hilltop business district.

CP-1.1: Browne's Star Grill/Pochert Building - subject to feasibility assessments, retain as much of the Browne's Star Grill and Pochert historical buildings as possible and redevelop the remaining city property for mixed use including ground floor retail, upper floor office and/or mixed income housing.

CP-1.2: MLK Jr Way and 11th Ave Site: subject to feasibility assessments, support the redevelopment of the vacant properties on MLK Jr. Way and J Street at 11th Avenue for mixed use with ground floor retail, street level artist live/work housing, an educational center, and/or upper floor office and mixed income housing activities and the possible retention and incorporation of the Tally Ho Tavern building.

CP-1.3: Municipal Service Center - subject to feasibility assessments, redevelop the city property housing the Municipal Services Center at MLK Jr. Way and South 13th Street for mixed use including ground floor retail with upper floor mixed income housing.

CP-1.4: Allen Renaissance Center - support the restoration of the former Valhalla Hall for ground floor coffee shop and restaurant, and upper floor performing arts, science and

computer lab, and other outreach educational activities.

CP-1.5: Other private development opportunities – promote the redevelopment of underutilized surface parking lots, vacant lands, or underused buildings for new development projects, that help to create a dense mix of uses throughout the district, including retail, restaurants, office, personal services, medical facilities, and mixed-income housing, such as those illustrated for the Save-a-Lot and Safeway sites in the catalytic project envelope studies.

1.3.2.2: Land use

Environmental impacts – both alternatives will continue development and redevelopment of the lands within the Hilltop Subarea for urban uses and activities to various intensities allowed under current zoning. An increase in urban development and thereby the overall population will in turn require and allow more intensified commercial, business, and other public facilities than would be possible under current development and population conditions.

An intensification of urban densities and uses will in turn, increase traffic congestion, park requirements, police and fire requirements, and other public service demands and fiscal impacts. If not properly managed and compensated, additional urban developments could further tax Tacoma's fiscal and public service resources potentially leading to a dilution of the service levels or capabilities provided current residents.

Inadequately located or designed urban infrastructure including roads, parking lots, and other improvements that are not sited on capable lands or using low impact development measures could create stormwater runoff, erosion, landslide, and other environment hazards affecting neighboring properties and public services.

Mitigation measures – Alternative 2: Hilltop Subarea Plan will restore streetcar service to Hilltop and develop more bicycle lanes, pedestrian walkways, sidewalks, and trails that will enhance the pedestrian scale and orientation in the area over Alternative 1.

Alternative 2: Hilltop Subarea Plan will also increase streetscape improvements and amenities that will appeal to increased pedestrian access and opportunities to a greater extent than Alternative 1: No-Action.

Alternative 2: Hilltop Subarea Plan will also designate primary street corridors that should concentrate retail and pedestrian oriented activities so that retail activities are not too scattered and thus too fragmented to make an impact on pedestrian potentials.

Specifically, Alternative 2: Hilltop Subarea Plan would initiate the following measures:

NR-4.3: Artist live/work – develop affordable artist live-work-teach-display-sell galleries and workshops as well as live-work housing opportunities to retain and attract young and emerging talent in Hilltop.

LU-1.5: Ground floor retail requirements – designate Pedestrian Street mixed use ground floor retail requirements to reflect market capacity and desired concentrated retail corridor locations, with a focus on MLK Jr. Way and South 11th Street in the business district core.

LU-1.6: Design standards – create and adopt a design overlay for the district that utilizes a hybrid “form-based” approach that illustrates building and street-level design objectives using examples to better address historic character, pedestrian vibrancy, compatibility and design quality issues within a flexible administrative procedure that recognizes innovation.

LU-1.7: View corridors and visual preservation – identify public view corridors, focused on the key east-west streets in the Hilltop subarea and create appropriate view protection measures to preserve and protect them.

CP-1.1: Browne's Star Grill/Pochert Building – subject to feasibility assessments, retain as much of the Browne's Star Grill and Pochert historical buildings as possible and redevelop the remaining city property for mixed use including ground floor retail, upper floor office and/or mixed income housing.

CP-1.2: MLK Jr Way and 11th Ave Site – subject to feasibility assessments, support the redevelopment of the vacant properties on MLK Jr. Way and J Street at 11th Avenue for mixed use with ground floor retail, street level artist live/work housing, an educational center, and/or upper floor office and mixed income housing activities and the possible retention and incorporation of the Tally Ho Tavern building.

CP-1.3: Municipal Service Center – subject to feasibility assessments, redevelop the city property housing the Municipal Services Center

at MLK Jr. Way and South 13th Street for mixed use including ground floor retail with upper floor mixed income housing.

CP-1.4: Allen Renaissance Center - support the restoration of the former Valhalla Hall for ground floor coffee shop and restaurant, and upper floor performing arts, science and computer lab, and other outreach educational activities.

CP-1.5: Other private development opportunities - promote the redevelopment of underutilized surface parking lots, vacant lands, or underused buildings for new development projects, that help to create a dense mix of uses throughout the district, including retail, restaurants, office, personal services, medical facilities, and mixed-income housing, such as those illustrated for the Save-a-Lot and Safeway sites in the catalytic project envelope studies.

CP-1.6: Hospital planning and coordination - work with MultiCare and Franciscan Health Systems and any other significant, campus-like institutions to evaluate more collaborative processes with the city and community, such as development agreements, to better define and support the long-range needs of these institutions, mitigate future development impacts as appropriate, and address how such future development can allow institutions to participate in the revitalization of the Hilltop business district.

1.3.2.3: Population and housing

Environmental impacts - both alternatives will continue development of the lands within the Hilltop Subarea to various urban mixed use intensities. An increase in urban development and thereby the overall population will in turn intensify commercial, business, and other public facilities more than would be likely under existing development conditions.

An intensification of urban uses and densities will in turn, increase traffic congestion, park requirements, police and fire requirements, and other public service demands and fiscal impacts.

The cost of providing streets, sidewalks, and other urban improvements will be cheaper within the Hilltop Subarea than will be typical of other areas of Tacoma, as will the costs for providing fire, police, garbage, school, and other urban services since the Hilltop Subarea is developed with infrastructure and services.

The cost and variety of housing to be provided within the Hilltop Subarea should be more economical and useful to a broader range of urban household types than would be otherwise typical of other areas of Tacoma since the Hilltop Subarea can be developed and redeveloped to a higher density with more low-impact, green, and smart development features within a sustainable community.

Mitigation measures - Alternative 2: Hilltop Subarea Plan will develop catalytic housing projects including affordable and workforce units for single adults, adult couples, family starter, and empty nester households who are predominantly employed in the service industries that Hilltop and Tacoma depends on for future economic development.

Alternative 2: Hilltop Subarea Plan will create more local employment opportunities implementing a sustainable community where residents may live, work, shop, and play to a greater extent in Hilltop and the downtown than Alternative 1: No-Action.

Alternative 2: Hilltop Subarea Plan will also promote incubator small business start-up potentials in catalytic projects in Hilltop including artist live/work allowances that will provide for and generate new small business enterprises with new employment opportunities.

Specifically, Alternative 2: Hilltop Subarea Plan will implement the following measures:

NR-1.1: Database - inventory available mixed use properties, buildings, and resources in the Hilltop Subarea to create a local database with which to identify opportunities during business and developer recruitment efforts.

NR-1.2: Business outreach - integrate public, nonprofit, and private business efforts and communications in the economic recruitment process to maximize impacts and allocate resources.

NR-1.3: Economic sustainability - recruit businesses that employ technical, professional, and managerial skills offered by and/or able to be developed for Hilltop residents to facilitate live/work sustainability in Hilltop.

NR-1.4: Medical and health industries - retain and recruit businesses that support and can expand the health related services and products offered by the MultiCare and Franciscan Health Systems and Community Health Care as well as

the growth of these institutions proper in the Hilltop area.

NR-1.5: Education industries - retain and recruit businesses that can support and expand on the opportunities created by the association of UW Tacoma, Evergreen State College Tacoma, and Bates Technical College with Hilltop Subarea business and employment development potentials.

NR-2.1: Marketing - identify and recruit businesses to fill critical gaps in retail sales and services such as coffee shops and restaurants, entertainment, personal and professional services as well as women's and children's clothing, etc.

NR-2.2: Design - initiate a competitive grant and low cost loan program, potentially using BID funds (see #10), to enhance retail storefronts including signage, display windows, building facades, and other improvements, with a focus on the core area around MLK and 11th.

NR-2.3: Promotion - initiate and expand retail sales and other events and activities including sidewalk cafes and vendors, farmers' and public markets to attract customers within and into the Hilltop area.

NR-2.4: Organization - adopt the National Trust for Historic Preservation's Main Street 4-Point program by the Hilltop Business District Association to organize marketing, design, and promotion strategies.

NR-2.5: Financing - adopt a Business Improvement District (BID) or Business Improvement Area (BIA) with which to assess benefiting properties and businesses for the cost of instituting coordinated marketing, design, and promotional activities and physical improvements and maintenance in the Hilltop district.

NR-2.6: Interim storefront uses - continue working with Spaceworks and other entities to institute temporary artist galleries or similar uses in vacant storefronts or buildings in order to provide visual interest and activity while the building is being marketed for a permanent tenant or owner.

NR-5.1: Education - expand school/community relations to include volunteer mentor and peer group support with the participation of the Tacoma Public Schools, Tacoma Housing Authority, UW Tacoma, Evergreen State College Tacoma, Bates Technical College, and others to improve educational opportunities, test scores,

and the reputation of McCarver School in the community and marketplace.

NR-5.2: Employment - create a youth job placement service offering part and full-time internships and employment opportunities with Hilltop businesses and organizations for area youth.

NR-5.3: Civic participation - create youth civic participation opportunities where youth can mentor children or adults, promote events or social outreach, construct projects or enhance the environment, network careers or occupations, or create fine and performance art as youth members of Hilltop public and private organizations.

NR-5.4: Social activities - expand youth social and recreation oriented activities and facilities that offer evening and after school peer group interactions and events.

NR-6.1: Housing options - increase housing choice by type, price, tenure, and location to house a mixed age, household, and income population in or near employment centers, transit corridors, and recreational sites to provide increased live/work/play opportunities in the Hilltop area.

NR-6.2: Affordable housing - award additional density, reduced parking requirements, reduced permit fees, and/or other measures for new housing projects that promote rental and sale workforce housing for moderate income working households employed or resident within Hilltop.

NR-6.3: Distribute affordable housing - incorporate moderate and low income housing opportunities in mixed use and mixed income building and project developments to avoid creating "housing project" concentrations and market image associations.

1.3.2.4: Transportation

Environmental impacts - both alternatives will allow development and redevelopment in the Hilltop Subarea for urban uses and activities to various intensities. An increase in urban development and thereby the overall employee and resident population will in turn increase traffic volumes, particularly if local employees and residents continue to commute to places of employment outside of the Hilltop area in private vehicles.

An increase in urban development and thereby the overall population will also create traffic congestion, particularly on the city's arterial roadway grid and at major intersections and connections on MLK Way, Yakima Avenue, 6th Avenue, South 11th and 19th Streets.

Increased urban development could also lead to a higher number of potential traffic accidents between vehicles, bicyclists, and pedestrians - if the local Hilltop bicycle and pedestrian networks are not improved.

Congestion will increase if the road network is not balanced with other modal improvements including transit and non-motorized trail systems.

Projections

In January 2012, Tacoma requested that the Puget Sound Regional Council (PSRC) assist with the evaluation of local and regional transportation impacts of alternatives for the South Downtown and Hilltop Subarea Plans by forecasting travel patterns utilizing the PSRC's travel demand model.

Regional travel demand analysis is essential to consider the impacts of redistributing growth allocated to Tacoma through Vision 2040 into the South Downtown and Hilltop Subareas, a change that would be expected to have a substantial impact on local and regional trip making. Details on the modeling methodology and results can be found in the Transportation Element of the Tacoma South Downtown Subarea Plan EIS, which has been incorporated by reference in this EIS.

Consistent with theory and research evidence on the travel demand impacts of compact, mixed-use development in accessible locations, model results suggest that relative to the No-Action Alternatives, all of the Action Alternatives will result in the following relative impacts to vehicular travel at the regional level:

- A lower share of trips made by driving single occupant vehicles (SOV)
- Reduced vehicle-hours of delay
- Essentially no change to vehicle-miles traveled
- (VMT)
- Increased use of non-auto modes of transportation

For the modeling study area—which includes the South Downtown and Hilltop Subareas—VMT and vehicle delay are projected to increase under all Action Alternatives and are projected to be highest with the most intense development alternatives. The largest buildout

alternative is projected to result in 17% more VMT and 28% more average daily vehicle hours of delay than the No Action Alternative. However, the results also show that per capita VMT and exposure to vehicle delay will be lowest for the most intense development alternatives. This is consistent with the projections that vehicular traffic impacts at the regional level will be minimal, with lower VMT and delay for the action alternatives with the highest development intensity.

Regarding mode split, the largest buildout alternative results in the greatest decrease in SOV use (27% vs. 36% for the No-Action Alternative), and the greatest increase in walking (42% vs. 29% for the No-Action Alternative).

Mitigation measures - Alternative 2: Hilltop Subarea Plan will expand and enhance other transportation modes including restoration of streetcar service on MLK Way, and more on-road bicycle lanes, pedestrian walkways and sidewalks to create direct linkages between Hilltop and the downtown.

Alternative 2: Hilltop Subarea Plan will create more local employment opportunities implementing a sustainable community where residents may live, work, shop, and play to a greater extent in Hilltop reducing the potential demand for and reliance on private vehicles.

Specifically, the following measures have been incorporated into Alternative 2: Hilltop Subarea Plan to mitigate possible adverse impacts:

M-1.3: Implement a monitoring program to collect transportation and land use performance data every five years.

M-1.4: Implement an Adaptive Management and Mitigation Program to address potential future impacts to mobility as the Subarea builds out.

M-2.1: Initiate a City program to create a prioritized list of pedestrian crossing improvements in Hilltop along with a plan for implementing the improvements.

M-2.2: Initiate a City program to create a prioritized list of pedestrian connector improvements in Hilltop along with a plan for implementing the improvements.

M-2.3: Explore potential strategies and collaborations to create pedestrian hillclimbs from the UWT and from the Brewery District.

M-3.1: Implement the City's proposed active bicycle infrastructure projects in Hilltop as identified in the Mobility Master Plan, and prioritize the South J Street Bicycle Boulevard.

M-4.2: Implement Complete Streets reconfigurations of Hilltop streets based on a priority that focuses on the MLK Jr Way business district.

M-5.1: Streetcar (LINK) - Continue to support the selection of the North Downtown Central Corridor (E1) alternative for the Sound Transit LINK light rail extension.

M-5.5: Pierce Transit - retain and expand Pierce Transit's schedules and stops to include hours and routes that support Hilltop district employees and residents, particularly at MultiCare and Franciscan Health System's Hospitals, Community Health Care and within the business district core.

1.3.2.5: Noise

Environmental impacts - both alternatives will allow development and redevelopment in the Hilltop Subarea for urban uses and activities to various intensities. An increase in urban development and thereby the overall employee and resident population will in turn increase traffic volumes and noise levels associated with traffic, particularly if local employees and residents continue to commute to places of employment outside of the Hilltop Subarea in private vehicles on MLK Way, Yakima Avenue, and South 11th and 19th Streets.

An increase in urban development and thereby the overall population will also create traffic congestion, particularly on the city's arterial roadway grid and at major intersections and connections on South 11th and 19th Streets. Congestion and background traffic noise will increase if these arterial collectors remain the primary vehicular travel corridor with the surrounding city, and to local community business and service activities.

Both alternatives will also temporarily increase construction noise levels on project sites and from truck and other equipment traffic into and out of the Hilltop Subarea.

Mitigation measures - Alternative 2: Hilltop Subarea Plan will encourage green roofs and walls, and green building energy and sound absorption materials that will absorb and reduce noise levels.

Specifically, the following measures have been incorporated into Alternative 2: Hilltop Subarea Plan to mitigate possible adverse impacts by installing vegetation and other natural materials that can buffer direct noise impacts:

OS-1.3: designate a system of coordinated open spaces, conservation corridors, greenways and green streets to link Hilltop parks and community facilities, and connect the Hilltop district to adjacent neighborhoods, the Prairie Line Trail, UW Tacoma and the Thea Foss Waterway.

OS-2.1: Stormwater - develop rain gardens, green roofs and walls, bio-filtration swales, and other green development features in and around the Hilltop Subarea's public facilities and within the Hilltop area's Complete Streets as well as in new project developments.

OS-2.2: Develop partnerships and seek funding from the City of Tacoma Public Works, Department, the Center for Urban Waters, Citizens for a Healthy Bay, the Puget Sound Partnership, the Department of Ecology, the U.S. EPA, and other organizations to develop natural drainage features in existing and planned open spaces.

OS-2.3: Native habitat - plant street trees, reforest open spaces, remove invasive species, and promote use of native and drought resistant plants to restore wildlife habitat in and around Hilltop's public facilities and within Hilltop's Complete Street corridors.

1.3.2.6: Public services - fire, police, and utilities

Environmental impacts - both alternatives will replace existing vacant and underdeveloped land with more residential, retail, and recreational activities increasing the demand and need for more fire, police, waste disposal, sewer, water, and stormwater public services and facilities.

Both alternatives will increase development density in mixed use structures with ground floor retail platforms when affordable or workforce housing is provided generating more population and more demand for public services and facilities.

Mitigation measures - as a result of additional development, both alternatives will collect a greater volume of property taxes and utility fees and service charges with which to finance the

proportionally greater share of public facilities and services that will be required of a larger population.

1.3.2.7: Public services - schools

Environmental impacts - both alternatives will allow development and redevelopment in the Hilltop Subarea for urban uses and activities to various intensities. An increase in urban development and thereby the overall resident population will in turn increase the demand for additional education personnel, equipment, and facilities.

Under either alternative, the Hilltop Subarea will be developed and redeveloped with higher density housing oriented to individuals, couples, and young family starters, as well as empty nesters and seniors that do not generate high ratios of school age children. In addition, fertility rates have been declining steadily over the years further reducing the number of children being produced for a typical household, let alone household types that do not contain high ratios of dependent children.

Mitigation measures - as a result of additional development, both alternatives will collect a greater volume of school impact fees with which to finance the share of school facilities and services that will be required of a larger population.

However, Alternative 2: Hilltop Subarea Plan will develop more housing options including affordable and workforce units for single adults, adult couples, family starter, and empty nester households who will generate less school children per household than would be typical of other residential developments in the city.

1.3.2.8: Public services - city hall

Environmental impacts - both alternatives will allow development and redevelopment in the Hilltop Subarea for urban uses and activities to various intensities. An increase in urban development and thereby the overall employee and resident population will in turn increase the demand for city personnel, equipment, and facilities.

Mitigation measures - as a result of additional development, both alternatives will collect a greater volume of property taxes with which to finance the share of city facilities and services that will be required of a larger population and employee workforce.

1.3.2.9: Public services - natural gas, power, telecommunications, and irrigation water

Environmental impacts - both alternatives will replace existing vacant and underdeveloped land with residential, commercial, and other urban uses that will require energy to operate and maintain thereby increasing demands on local electrical, natural gas, telecommunications, irrigation water, and other community services.

Both alternatives will develop more residential, retail, recreation, and other urban uses proportionately increasing the demand for community services and facilities.

Mitigation measures - Alternative 2: Hilltop Subarea Plan will encourage green and smart building technologies that will utilize recycled building materials, stormwater recycling, green roofs and walls, and energy and sound absorbing insulation building practices that will require less energy to operate than existing practices allowed under Alternative 1: No-action.

Alternative 2: Hilltop Subarea Plan will also encourage the use of solar roofs on new mixed use structures that will increase the production of electricity and reduce operating and maintenance costs.

1.3.2.10: Parks and recreation

Environmental impacts - Both alternatives will allow development and redevelopment in the Hilltop Subarea for urban uses and activities to various intensities. An increase in urban development and thereby the overall resident population will in turn increase the demand for park and recreational facilities, and for open space and wildlife habitat relief, particularly for residents of high density neighborhoods like the Hilltop mixed use zones.

Mitigation measures - both alternatives will potentially collect a greater volume of park impact fees with which to finance the proportionally greater share of park and recreation facilities and services that will be required of a larger population.

Alternative 2: Hilltop Subarea Plan will encourage the development of street-level amenities and potentially rooftop recreational facilities.

Specifically, Alternative 2: Hilltop Subarea Plan will apply the following actions:

OS-1.3: designate a system of coordinated open spaces, conservation corridors, greenways and green streets to link Hilltop parks and community facilities, and connect the Hilltop district to adjacent neighborhoods, the Prairie Line Trail, UW Tacoma and the Thea Foss Waterway.

OS-1.4: Community gardens – plant community or pea patch gardens on vacant sites as well as other available lands within Hilltop to restore habitat, grow healthy foods for local use, and improve visual appearances, in some cases to serve as temporary uses on sites waiting for redevelopment.

OS-1.5: People's Community Center Plaza – redevelop the green space in front of People's Community Center into a more formal plaza type park with active features such as picnic shelters, tables, benches, splash fountain, and play equipment in accordance with the proposals in the People's Community Center master plan.

OS-2.1: Stormwater – develop rain gardens, green roofs and walls, bio-filtration swales, and other green development features in and around the Hilltop Subarea's public facilities and within the Hilltop area's Complete Streets as well as in new project developments.

OS-2.2: Develop partnerships and seek funding from the City of Tacoma Public Works Department, the Center for Urban Waters, Citizens for a Healthy Bay, the Puget Sound Partnership, the Department of Ecology, the U.S. EPA, and other organizations to develop natural drainage features in existing and planned open spaces.

OS-2.3: Native habitat – plant street trees, reforest open spaces, remove invasive species, and promote use of native and drought resistant plants to restore wildlife habitat in and around Hilltop's public facilities and within Hilltop's Complete Street corridors.

M-2.2: Initiate a City program to create a prioritized list of pedestrian connector improvements in Hilltop along with a plan for implementing the improvements.

1.3.2.11: Archaeological and historical resources

Environmental impacts – Both alternatives will allow development and redevelopment in the Hilltop Subarea for urban uses and activities to various intensities. An increase in urban development and thereby the overall population will create more activity and a demand to retrofit or redevelop existing historical areas and properties.

Additional use could exceed the capability of some of these sites if these lands and buildings are not properly protected. Potential reuse or redevelopment of some of these areas could alter their historic and aesthetic character, possibly destroying community value if not properly protected. Potential redevelopment could also obscure aesthetic resources and potential visual imagery if not planned and designed.

Mitigation measures – both alternatives will require developers to excavate and evaluate any archaeological resources that may be impacted by construction, particularly along the ridgeline where such resources are likely to be.

In addition, Alternative 2: Hilltop Subarea Plan may require developers to relocate older viable single family structures with any architectural or historical (old) value to the community to other places within or adjacent to the Hilltop Subarea area to salvage community value.

Specifically, the following measures have been incorporated into Alternative 2: Hilltop Subarea Plan to mitigate possible adverse impacts (note that the catalytic redevelopment projects are included with the assumption that Transfer of Development Rights can be used to transfer historic building credits between properties in the Hilltop Subarea):

NR-2.2: Design – redefine the Hilltop brand to include arts and historical based themes and install artworks, gateways, way-finding signage, walking tours, maps, and streetscape at the entrances into and of significant landmarks in Hilltop.

NR-4.1: Art and history walking tours – sign and create audio and phone apps for walking tours of Hilltop historical sites, buildings, and other visually interesting and significant landmarks for local recognitions as well as for historical tourist attractions.

LU-1.6: Design standards – create and adopt a design overlay for the district that utilizes a hybrid “form-based” approach that illustrates building and street-level design objectives using examples to better address historic character, pedestrian vibrancy, compatibility and design quality issues within a flexible administrative procedure that recognizes innovation.

CP-1.1: Browne’s Star Grill/Pochert Building – subject to feasibility assessments, retain as much of the Browne’s Star Grill and Pochert historical buildings as possible and redevelop the remaining city property for mixed use including ground floor retail, upper floor office and/or mixed income housing.

CP-1.2: MLK Jr Way and 11th Ave Site:- subject to feasibility assessments, support the redevelopment of the vacant properties on MLK Jr. Way and J Street at 11th Avenue for mixed use with ground floor retail, street level artist live/work housing, an educational center, and/or upper floor office and mixed income housing activities and the possible retention and incorporation of the Tally Ho Tavern building.

CP-1.3: Municipal Service Center – subject to feasibility assessments, redevelop the city property housing the Municipal Services Center at MLK Jr. Way and South 13th Street for mixed use including ground floor retail with upper floor mixed income housing.

CP-1.4: Allen Renaissance Center – support the restoration of the former Valhalla Hall for ground floor coffee shop and restaurant, and upper floor performing arts, science and computer lab, and other outreach educational activities.

CP-1.5: Other private development opportunities – promote the redevelopment of underutilized surface parking lots, vacant lands, or underused buildings for new development projects, that help to create a dense mix of uses.

1.3.2.12: Aesthetics

Environmental impacts – Both alternatives will allow development and redevelopment in the Hilltop Subarea for urban uses and activities to various intensities. An increase in urban development and thereby the overall population will create more activity and a impact on

aesthetic resources and viewsapes including landmark buildings, street corridors, streetscapes, pedestrian areas and activities, and other features.

Potential reuse or redevelopment of some of these areas could alter their aesthetic and historical character possibly enhancing their potential or destroying community value if not properly protected. Potential redevelopment could obscure aesthetic resources and potential visual imagery of Hilltop from the surrounding community, and from within specific sites and buildings if not properly planned and designed.

And, poorly designed or overtly contemporary building designs could overpower Hilltop’s historical, though eclectic building mix and streetscape diluting the subarea’s cultural and visual context and continuity.

Mitigation measures - Alternative 2: Hilltop Subarea Plan will adopt new form-based mixed use design guidelines specifying performance characteristics required of streetscapes, buildings, view corridors, on-site publicly-accessible pedestrian amenities, and other aesthetic features.

Specifically, Alternative 2: Hilltop Subarea Plan will apply the following action items:

LU-1.5: Ground floor retail requirements – designate Pedestrian Street mixed use ground floor retail requirements to reflect market capacity and desired concentrated retail corridor locations, with a focus on MLK Jr. Way and South 11th Street in the business district core.

LU-1.6: Design standards – create and adopt a design overlay for the district that utilizes a hybrid “form-based” approach that illustrates building and street-level design objectives using examples to better address historic character, pedestrian vibrancy, compatibility and design quality issues within a flexible administrative procedure that recognizes innovation.

LU-1.7: View corridors and visual preservation – identify public view corridors, focused on the key east-west streets in the Hilltop Subarea and create appropriate view protection measures to preserve and protect them.

2 Alternatives

2.1: Overview

Tacoma entered into this Hilltop Subarea planning process to more directly address future environmental, economics, land use, transportation, public facilities, parks and recreation, and aesthetics of the Hilltop Subarea.

In addition, as part of the Hilltop Subarea planning process, and consistent with State Environmental Policy Act (SEPA) rules, Tacoma will adopt a Planned Action Ordinance (PAO), which will streamline environmental review for development consistent with the proposed Hilltop Subarea Plan and regulations. The basic steps in designating planned action projects are:

- Prepare an environmental impact statement (EIS),
- Designate the planned action projects by ordinance,
- Review permit applications for proposed projects as consistent with the designated planned action.

The intent is to provide more detailed environmental analysis during formulation of planning proposals, rather than at the project permit review stage.

This Planned Action Environmental Impact Statement (EIS), addresses the first step identified above, analyzing the environmental impact of two primary alternatives - Alternative 1: the No-action alternative or a continuation of existing plans and policies, and Alternative 2: the Hilltop Subarea Plan.

Tacoma City Council will select one of the alternatives to be the Hilltop Subarea Plan in accordance with Chapter 35.63 of the Revised Code of Washington (RCW) and the provisions of the Washington State Growth Management Act (GMA) Chapter 36.70A of the Revised Code of Washington (RCW).

Population – both alternatives

According to Tacoma's Community & Economic Development Department's moderate growth scenario, Hilltop Subarea's population will increase from 2,903 persons in 2010 to 7,915 persons by 2040 or at an annual average rate of 3.4% for the projection period.

Hilltop will grow in accordance with recent and expected trends which are optimistic but not maximum build-out. Maximum build-out could reach 14,520 persons by 2040 at an annual average rate of growth of 5.5%.

If the Hilltop Subarea develops in accordance with the moderate growth scenario the additional 5,012 population would generate 4,977 households or 3,152 more than in 2010 where an Hilltop household presently includes 1.59 persons.

Should the Hilltop Subarea reach the potential build-out the additional 11,617 population would generate 9,132 households or 7,306 more than in 2010 where a Hilltop household presently includes 1.59 persons.

Moderate	Population	Households
2010	2,903	1,826
2040	7,915	4,977
Differ	5,012	3,152
Build-out	14,520	9,132
Differ	11,617	7,306

Source: Tacoma Community & Economic Development Department 2012

Assumes 1.59 persons per household per 2010 Census for Hilltop

2.2: Alternative 1: No-Action

The Washington Administrative Code (WAC) requires a No-Action alternative be considered within the environmental review process. Under a No-Action alternative, the prevailing 2011 Tacoma Comprehensive Plan, Zoning Map, Tacoma Municipal Code (TMC) Title specifying zoning districts, development and parking regulations, and mixed use design standards would remain in effect and all Hilltop planning and implementation policies would continue to be coordinated with these documents.

The present plan and policies or no-action would result in the following:

Land use and zoning

- **Neighborhood Residential Mixed Use (NRX) zoning** - would remain as designated in the current zoning map including the classification of the single and multiple family neighborhood generally located between South 6th and 9th Streets, and the alley between MLK and J Street to Yakima Avenue.

The NRX zoned area would likely retain much of the existing single and multifamily housing stock.

▪ **Residential Commercial Mixed Use (RCX) zoning** - would remain as designated in the current zoning map generally including most of the neighborhoods located east of the alley between MLK and J Street to Yakima Avenue, from South 9th Street to the north edge of St Joseph's Hospital at South 17th Street, and from the south edge of the hospital to South 27th Street.

A partial block of RCX is zoned east to the alley from Yakima Avenue south of South 8th Street, and west from South L Street to the alley east of M Street between South 12th/Brazill and 13th Streets.

The RCX zoned area would likely retain much of the existing single and multifamily family housing stock on blocks where the structures remain in good condition.

Underdeveloped or "soft" properties would likely be redeveloped throughout the zone for buildings with ground floor "platforms" providing parking and some retail or related use with wood or steel framed upper floor residential uses up to 5 or more floors to the maximum allowable 70-80 foot height where bonus provisions are met.

Neighborhood Commercial Mixed Use (NCX) zoning - would remain as designated in the current zoning map including the MLK Way corridor between the alleys on the west and east from South 6th Street to across South 23rd Street.

The NCX district extends east from MLK between South 6th and 7th Streets to the alley between I and J Streets, east from MLK between South 10th to South 12th/Brazill Streets, west from MLK to include Peoples' Park and the Tacoma Housing Authority, west from MLK between South 10th to South 12th/Brazill Street to the alley west of South Sheridan, and west from MLK to L Street between South 14th and 15th Streets.

The NCX zoned area would retain some of the older, possibly historic retail and apartment structures along MLK Way and South 11th Street that are in good condition and rented.

Considerable underdeveloped or "soft" properties would be redeveloped throughout the zone for buildings with ground floor "platforms" providing frontage retail uses with rear alley accessed parking with wood or steel

framed upper floor residential uses up to 3 floors to the maximum allowable 45 foot height along the corridor, or up to 5 floors to the maximum allowable 65 foot height where bonus provisions are met within 200 feet of the MLK Center core pedestrian street.

Redevelopment pressure would be exerted on and could fragment the compact "hard" single family housing blocks of MLK Way front St Joseph Hospital between South 17th and 19th Streets, and the single family residential neighborhood extending south of South 19th Street to 23rd Street.

▪ **Hospital/Medical Mixed Use (HMX) zoning** - would remain as designated in the current zoning map including the property surrounding MultiCare Health System's Mary Bridge and Tacoma General Hospital between South L and I Street/Yakima Avenue from Division Avenue south to South 6th Street including the block south of South 6th to 7th Streets between L Street and MLK Way.

HMX zoning also includes the property surrounding Franciscan Health System's St Joseph Hospital including the blocks between MLK Way and Yakima Avenue from South 17th to 19th Street including the block between South J and I Street between South 16th and 17th Streets, and frontage properties south of South 19th Street from the alley east of MLK to the alley west of Yakima Avenue.

The north HMX zone does not include all of MultiCare Health Systems property holdings. MultiCare has acquired scattered properties west of South L Street and across Division Avenue that are used for off-site surface parking lots. These scattered parking lots diminish the integrity of adjacent properties threatening the viability of existing residential uses.

The north HMX zone includes a number of older and possibly historic churches and multifamily apartment buildings that front Division Avenue and South I Street across from Wright Park that are not compatible with potential hospital expansion development.

By contrast, the south HMX zone includes and contains all existing Franciscan Health System property holdings and St Joseph Hospital facilities and parking lots and structures.

Housing

- **Single family housing** - including low density detached and attached housing products would be retained in the residential neighborhoods west of MLK and possibly in blocks within the NRX and RCX zones where a preponderance of structures are in good condition.

However, some of these blocks could be fragmented by redevelopment of multifamily structures up to 45 feet in the NCX and 60-80 feet in the RCX zones that would reduce the viability of remaining single family low density structures, particularly along MLK and J Street south of South 19th Street, and the west side of I Street south of South 23rd Street.

- **Multifamily housing** - including older 3-5 floor structures would likely be retained along MLK Way, within the HMX zone fronting Wright Park, and within the RCX zone fronting South 11th Street and Yakima Avenue where the structures are in good condition and rented.

New 3-5 floor platform buildings would likely be developed on “soft” properties in the NCX and RCX zones where there is the ability to package larger sites and particularly where the sites have view potential on the downhill ridge.

However, most of these new mixed use developments will likely not be developed with ground floor retail or other pedestrian-oriented uses particularly along I and J Streets within the residential neighborhoods, and along MLK outside of the business district due to a lack of market interest and demand.

Similarly, new mixed use developments will likely not be developed adjacent to the hospital zones, particularly MultiCare properties, due to the prevalence of hospital owned surface parking lots and the uncertainties about future hospital development and expansion.

Road network

- **Street typologies** - would remain unchanged retaining Hilltop streets as multipurpose, undifferentiated for form or function to reflect thorough traffic, rubber-tire, streetcar, or rail transit, bikeways, walkways and streetscapes, urban on-street residential parking, or Complete Street low impact development potentials or standards.

Transit routes

- **Hilltop transit service** - would continue to be based on Pierce Transit's rubber-tire transit routes that pass through Hilltop bound for the downtown, waterfront, or other city areas.

On-road bicycle routes

- **On-road bike lanes** - currently include designated bike lanes on South 15th Street from Sprague to Yakima Avenue. All other streets are undesignated or improved with most on-road commuting and recreational users riding in-lane on undesignated streets within Hilltop and between Hilltop, the downtown, and rest of the city.

Pedestrian walkways and sidewalks

- **Sidewalks** - are provided throughout the Hilltop Subarea though of varying condition, width, and enhancement - especially those extending down the steep hillside between Hilltop and the downtown, UWT, and Thea Foss Waterway.

Streetscapes, gateways, and wayfinding

- **Streetscapes** - have been partially improved along MLK Way with some street trees and pedestrian light standards within the business district, and on South 6th, 11th, and 15th Streets between Hilltop and the downtown.
- **Gateways** - have not been installed or proposed to be installed anywhere within the Hilltop Subarea or between Hilltop and major entrances from the neighborhoods to the west, the downtown, or South Tacoma.
- **Wayfinding signs** - have not been installed or proposed anywhere within the Hilltop Subarea or between Hilltop and major destinations in the downtown, UWT, or waterfront. The Hilltop Business Association has installed banners on light standards on 11th Avenue, however, that feature the Hilltop logo.

Parks and open spaces

- **Major gathering places** - would remain as currently developed with Wright and Peoples Parks providing the major multipurpose gathering places within the Hilltop Subarea.
- **Indoor recreation facilities** - would continue to be provided at Peoples Community Center (pool, gym, and physical conditioning), McCarver School (gymnasium), and the Boys & Girls Club (gymnasium) in Stanley Park.
- **Athletic fields and facilities** - including basketball courts and soccer/baseball fields

would continue to be provided at Mc Carver School, Stanley Park, and Stadium High School within a 3 mile service radius of the Hilltop Subarea.

- **Children's playgrounds** - and play equipment would continue to be provided in Wright Park, Neighbor's Park, Peoples Park, Lots for Tots, McCarver Scholl, and Sheridan Park which are generally within a convenient 0.25 mile radius walking distance of residential areas.
- **Community gardens** - would continue to be sponsored by Tacoma Metro Parks and on private properties adjacent to the Hilltop business district, at McCarver School, and east of MLK above UWT.
- **Park plazas** - would continue to be provided by MultiCare Health Systems on the walkway between their facilities on MLK Way.

2.3: Alternative 2: Hilltop Subarea Plan

The proposed Hilltop Subarea Plan would supplement the 2011 Comprehensive Plan, Zoning Map, Tacoma Municipal Code (TMC) Title dealing with revised zoning districts, form-based mixed use design standards, and other implementing measures to accomplish the following:

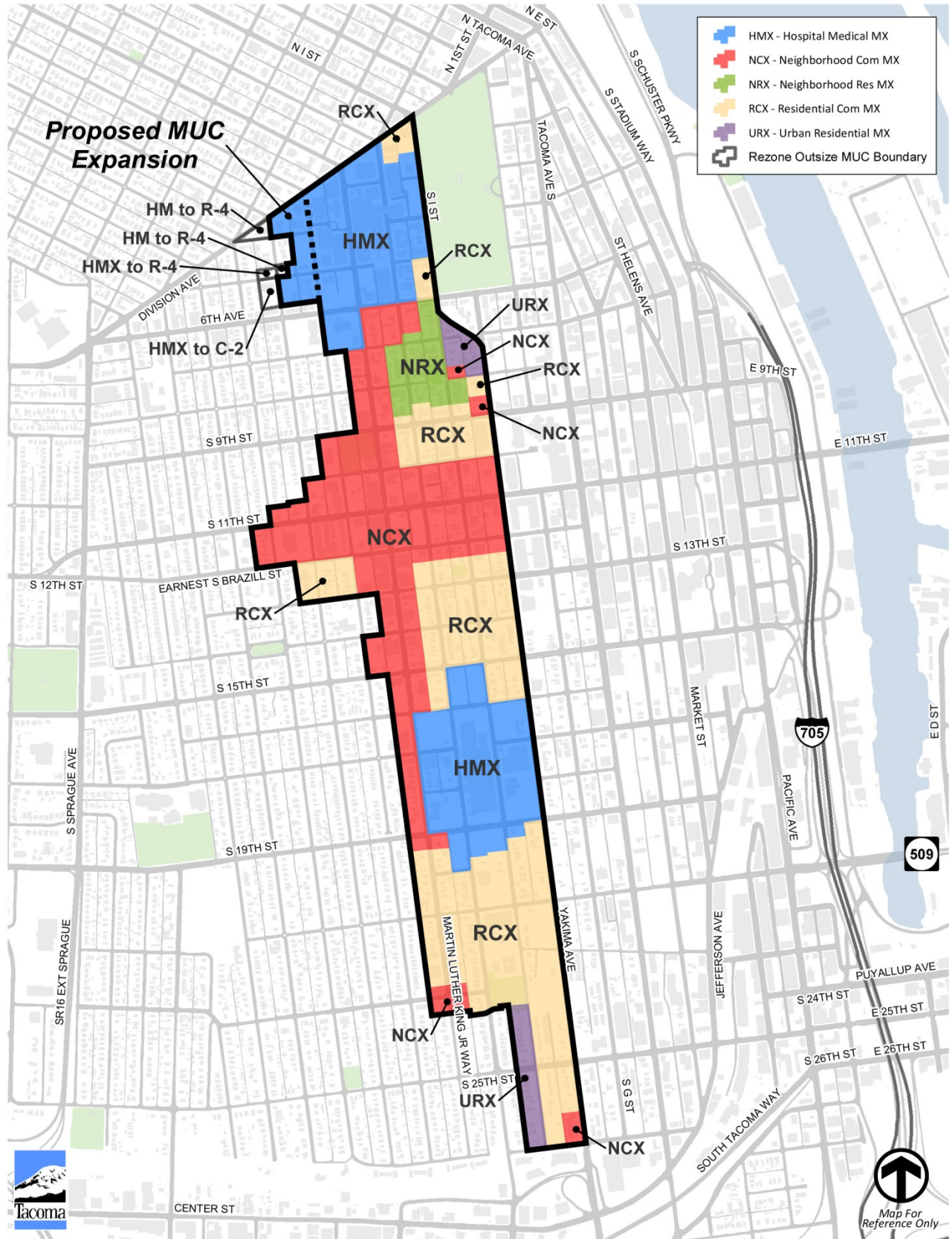
Land use and zoning

- **NCX to RCX zoning** - for the blocks located south of South 19th Street on MLK Way to reflect existing good condition single family committed structures and better protect the integrity of the neighborhood from fragmentation.
- **NCX zoning will be retained** - however, for the corner lots on MLK Way at South 23rd Street to retain the neighborhood stores that were developed to serve historical streetcars lines on MLK Way.
- **HMX zoning and Hilltop Subarea boundaries will be expanded west** - to include MultiCare Health System properties that have been acquired west of South L Street and north of South 6th Avenue that are viable and supportable for hospital related developments.
- **HM and HMX zoning will be revised** - west of South L and M Streets to C-2 commercial and R-4 and R-4L high density housing to reflect existing uses in these parcels that are not owned by MultiCare Health Systems and which are not

viable or necessary to a viable MultiCare hospital plan.

- **HMX zoning will be revised** - along the east boundary with South I Street to exclude the churches and existing apartment buildings located on Division Avenue and I Street/Yakima Avenue that are not owned by MultiCare Health Systems and which are not viable or necessary to a functional MultiCare hospital plan. These properties would be rezoned RCX to reflect current and future church and residential uses.
- **NCX zoning will designate Pedestrian Street ground floor retail required corridors** - to consist of South 11th Street and MLK Way within the Hilltop business district. Mixed use developments on these corridors would be required to incorporate retail uses on the street frontage to protect and establish a pedestrian-oriented retail street business district. Mixed use developments on the side streets and balance of MLK Way could provide retail ground floor use as an option, or other pedestrian-oriented or even ground floor artist live/work or residential units that address the street but which do not dilute retail market potential to occupy the critical street frontage within the Hilltop business district.
- **Form-based mixed use design guidelines** - will be developed as an overlay district to govern the design and development of new mixed use structures within the Hilltop zones including particulars designating building mass and articulations, materials and colors, ground floor retail facades, entries, awnings, window displays, streetscape paving, furnishing, street trees, and landscaping - as well as solar applications, green roofs and walls, rain gardens, and other low impact and energy saving technologies.

Action Alternative



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Housing

- **Housing options** - will be promoted within the Hilltop mixed use zones to develop a wider variety of form-based products to house a wider variety of urban household types including single adults, adult couples, family starters (with young children), and empty nesters of all ages and incomes.
- **Assisted-income population distribution** - will be promoted where for-profit and nonprofit housing developers are encouraged by catalytic project examples to jointly develop mixed income and income-assisted population projects to avoid creating income-assisted population “ghetto” or “project” concentrations and stigmas within Hilltop.
- **Special population project distribution** - will be promoted where nonprofit housing developers are encouraged to distribute projects throughout the Hilltop Subarea to avoid creating special population “ghetto” or “project” concentrations and stigmas within Hilltop.

Road network

- **Street types** - will be established for each street within the Hilltop Subarea using the definitions developed in the Tacoma Complete Streets Manual to specify main street, transit priority, avenue, and urban residential types. Tacoma’s Complete Streets Design Guidelines recommend a range of low-impact development features, including rain gardens and bio-swales where feasible.
- **MLK Way** - will be designated a hybrid Main Street/Transit Priority street incorporating the streetcar design concepts developed by the Tacoma Public Works Department. The roadway could be reconfigured to provide alternating curbside parking or streetcar stops with a vehicular moving lane in each direction, median turning lanes at major intersections, extended curbs at crosswalks, and expanded streetscape enhancements.
- **Avenue type** - will be designated on South 15th and 25th Streets to consist of a vehicular moving lane in each direction with curbside parking, bike lanes, extended curbs at crosswalks, and expanded streetscape or walkway enhancements.
- **Urban residential type** - will be designated on South L Street from South 4th Street to South 27th Street and on MLK Way from South 19th to 27th Street to consist of a vehicular moving lane

in one or both directions with curbside or angled parking on one or both sides, extended curbs at crosswalks, roundabouts within some neighborhood street intersections, sidewalks at the right-of-way edge and street trees and other ground cover enhancements.

- **Parkway**- based on the typology in the Downtown Element of the Comprehensive Plan, will be designated on South I Street/Yakima Avenue from Division Avenue south through the Hilltop Subarea past South 27th Street into south Tacoma.

Transit routes

- **Streetcar service** - will be restored on MLK Way from Division Avenue south to South 25th Street with stops at major destinations including MultiCare Health System’s Mary Bridges and Tacoma General Hospital, Peoples Park/Hilltop business district, People’s Community Center, Franciscan Health System’s St Joseph Hospital, and the south neighborhood/McCarver School. Streetcars may run in both directions on the outside lane(s) with curbside stops or down a median with in-median stops depending on the outcome of further feasibility studies.
- **LINK service** - will be expanded north of Commerce Street on Stadium Way to Division Avenue then west to Hilltop depending on feasibility studies being conducted by Sound Transit. LINK could also run on MLK down a median with in-median stops instead of streetcars depending on Sound Transit and Public Works feasibility studies.
- **Pierce Transit service** - will continue to include rubber-tire transit routes that pass through Hilltop bound for the downtown, waterfront, or other city areas. Depending on funding, Pierce Transit may restore the bus shuttle loop between the downtown and Hilltop or interface bus routes and stops with streetcar or LINK stops to achieve the same service potential.

Bicycle Facilities

- **On-road bike routes** - will be designated and improved in accordance with the recently adopted Mobility Plan including typologies for bike lanes, bike boulevards, and shared in-lane or “sharrow” streets.
- **Bike lanes** - will be designated on South I Street/Yakima Avenue from Division Avenue south to South 6th Street then south on Yakima Avenue through the Hilltop Subarea to South Tacoma. Bike lanes will also be designated on South 6th Street from South Ainsworth to

Broadway Avenue, on South 11th Street from Sprague Avenue east through the downtown and across the Steel Bridge into the Port, on South 19th Street from Sprague Avenue to MLK Way, and on South 25th Street from Sprague Avenue to MLK Way.

- **Bike boulevards** - including thorough bike lanes will be designated on South Sheridan Avenue from South 6th to 25th Street, on South J Street from Division Avenue to South 27th Street, and on South G Street/Fawcett Avenue from Division Avenue to South 25th Street.

Pedestrian walkways and sidewalks

Sidewalks - will be maintained or replaced throughout Hilltop depending on walkway conditions and in accordance with street typologies. Sidewalks will be expanded from the curb and furnished with street trees along the connector streets; installed at the right-of-way edge and furnished with street trees on urban residential; and installed on the right-of-way edge and furnished with rain gardens, where feasible, as recommended by the Tacoma Complete Streets Design Guidelines.

Streetscapes

- **MLK Jr Way streetscape** - will be enhanced with street trees, pedestrian light standards, benches, artworks, and other furnishings and extended from Division Avenue to South 25th Street from the curb to the right-of-way edge. Special paving accents and other improvements will be installed on a graduated basis with the lowest impact located at the ends of MLK Way and the most intense designs in the Hilltop business district core at MLK and South 11th Street.
- **Yakima Avenue streetscape** - will be enhanced with street trees along the walkway and in the median, pedestrian light standards, and other furnishings befitting the parkway street typology from Division Street to South 27th Street and the approach to the bridge over Interstate 5.
- **East corridor road streetscape** - will be upgraded and enhanced with additional street trees, pedestrian light standards, benches, planter boxes, and other furnishings reflecting the downtown context from MLK east on South 6th, 11th, 15th, 19th, and 25th Streets to Pacific and Market Avenues with connections to the Prairie Line Trail and Bridge of Glass. Benches and planter boxes may be incorporated into the walkways to provide resting areas for pedestrians making the steep hillclimbs.
- **West corridor road streetscape** - will also be upgraded and enhanced with street trees and

pedestrian light standards on the major corridor streets that extend into MLK from the neighborhoods to the west on South 11th, 15th, 19th, and 25th Streets.

Gateways and wayfinding

- **Gateways** - that include signature artworks and a Hilltop logo element will be installed on the major entrances into Hilltop on Division Avenue, South 6th, 11th, 19th, and 27th Streets.
- **Wayfinding signs** - incorporating elements from a Hilltop logo will be installed on MLK Way and Yakima Avenue, and on Division Avenue, South 6th, 11th, 19th, and 27th Streets, and throughout the Hilltop Subarea to identify routes to major destinations and activities.

Parks and open spaces

- **Major gathering places** - will be enhanced with the possible development of all-weather structures to support a Farmers' or Public Market in People's Park. The green swale in front of Peoples Community Center will be retrofit to provide a hardscape park and gathering place with picnic shelter, tables and benches, play equipment, artworks, and possible splash fountain.
- **Indoor recreation facilities** - will be retrofit and enhanced including Tacoma Metro Parks project to replace the existing pool with an indoor/outdoor leisure pool facility and expanded physical conditioning.
- **Community gardens** - will be expanded on vacant lots throughout Hilltop to produce food and enhance visual and green experiences.
- **Additional publicly accessible parks or activity areas** - will be created by private developments along MLK Way and within the higher density projects in the RCX zone using height and density bonus allowances. Public plazas may be located along the street frontages, in courtyards, and/or on rooftops.
- **Hospital campus park elements** - including plazas, overlooks, woonerfs, and other publicly accessible spaces will be created by MultiCare and Franciscan Health Systems on their hospital campuses in accordance with hospital master plan development agreements.

Catalytic projects

Hospital coordination and planning - will be conducted with MultiCare and Franciscan Health Systems and any other significant, campus-like institutions to evaluate more collaborative processes with the city and community, such as development agreements, to better define and support the long-range needs of these institutions, mitigate future development impacts as appropriate, and address how such future development can allow institutions to participate in the revitalization of the Hilltop district.

- **Browne's Star Grill/Pochert Building** - subject to feasibility assessments, will retain as much of the Browne's Star Grill and Pochert historical buildings as possible and redevelop the remaining city property for mixed use including ground floor retail, upper floor office and/or mixed income housing..
- **Municipal Service Center** - subject to feasibility assessments, will redevelop the city property housing the municipal services center at MLK and South 13th Street for mixed use including ground floor retail with upper floor residential.
- **MLK Housing Development Association (MLKHDA)** - subject to feasibility assessments, will support the redevelopment of the vacant properties on MLK and J Street at South 11th Street for mixed use with ground floor retail and upper floor office and housing activities and the potential for a community educational facility and the restoration of the Tally Ho Tavern.
- **Allen Renaissance Center** - will support the restoration of the former Valhalla Hall building for ground floor coffee shop and restaurant, and upper floor performing arts, science and computer lab, and other outreach educational activities.
- **Other private opportunities** - will promote the redevelopment of underutilized surface parking lots, vacant lands, or underused buildings for new mixed use development projects along MLK providing ground floor retail, upper floor office and/or mixed income housing activities such as illustrated for Save-A-Lot and Safeway in the catalytic project envelope studies.

Organization

- **Partnerships or joint ventures** - will be promoted for the implementation of portions or all of a number of the Hilltop Subarea Plan projects with a variety organizations and entities including the Hilltop Business District Association, Tacoma Housing Authority, and Allen Renaissance Center, among others.

3 The proposed action

The proposed action is to adopt and implement the Hilltop Subarea Plan for Tacoma, Washington. The proposed action is in accordance with Chapter 35.63 of the Revised Code of Washington (RCW) and the provisions of the adopted Growth Management Act (GMA) Chapter 36.70A of the Revised Code of Washington (RCW).

The proposed Hilltop Subarea Plan will supplement current Tacoma policies governing the environment, land use, economics, transportation, design resources, parks and recreation, public services, and utilities conforming to GMA provisions.

Implementation actions will include land use, transportation, housing, zoning, and other measures to comply with the Hilltop Subarea Plan's policies.

Note: One of the proposed actions that was developed during the public process was to rename the MLK Mixed-Use Center to the Hilltop Mixed-Use Center. As a result, the name of the Draft MLK Subarea Plan was updated to "Hilltop Subarea Plan" for the final version of the Subarea Plan and Final EIS.

3.1: Hilltop Subarea

The Hilltop Subarea is centered on Martin Luther King (MLK) Way from Division Avenue to south of South 23rd Street, and to the west of I Street/Yakima Avenue from Division Street to South 27th Street. The Hilltop Subarea extends a half block west from MLK except in the Hilltop Mixed-use Center where it extends west to Sheridan Avenue along South 11th Street. The Hilltop Subarea includes approximately 165.51 acres not including public rights-of-way or facilities and acts as a major gateway into downtown Tacoma and its historic brewery district.

The Hilltop Subarea's major institutions include MultiCare Health System's Mary Bridge Children's and Tacoma Hospital in the north end of the Subarea between Division Avenue and South 6th Avenue, Group Health Tacoma Medical Center at MLK Jr Way and Division Avenue, and the Franciscan Health System's St Joseph Medical Center on South J Street between South 16th and 19th Streets.

3.2: Hilltop Subarea Plan objective

The purpose of the Hilltop Subarea Plan is to anticipate and guide the long-term redevelopment of the Hilltop Subarea including the Mixed-use Center, hospitals, and residential neighborhoods. The plan will serve as a statement of the city's commitment and direction for these areas and as a resource for potential investors, property owners, the community, and other public agencies.

The Hilltop Subarea Plan contents and implementing regulations retain some existing land use activities as well as recruit new and intensified commercial and residential mixed-use developments along with walkway and trail expansions, roadway reconfigurations, and other infrastructure improvements.

Key objectives include establishing new gateway entries to the Hilltop Subarea as well as enhanced connections between the district, downtown, and city, by refurbishing signage, streetscapes, and other amenities.

3.3: Actions completed to date

Recent development within the Hilltop Subarea includes:

Community Health Care Clinic - construction has been initiated of the 3-story, 59,100 square foot, \$26,000,000 regional health center on the northwest corner of South 12th/Brazill Street and MLK Way for treating low-income patients with a scheduled opening in August 2013. The building will replace a 7,000 square foot clinic located 2 blocks away which may be used for warehouse and maintenance operations. The new clinic will employ 130 full-time workers and service 200-300 patients daily.

The ground floor will provide an urgent care



clinic, pharmacy, laboratory, community meeting room, coffee shop, reception, and office space for a community-related organization.

The second floor will house the medical clinic with 36 exam rooms and a family-practice medical residency program with study space and classrooms for 18 resident doctors and office space for 6 MD trainers. Resident doctors will use the same exam rooms as the medical clinic.

The third floor will house a dental clinic, medical specialties clinic, and lunch and meeting room for the staff. A separate 3-story parking garage with 250 stalls will be built next to the clinic.

Franciscan Medical Building & Parking Garage - is under construction on the block east of MLK Way between South 16th and 17th Streets. The 5-story 120,000 square foot \$62,000,000 Franciscan Medical Building will adjoin a 7-story 770 stall parking garage and outdoor sitting area and sky-bridge to the existing hospital facility.

The medical facility will house the Franciscan Medical Group doctors specializing in primary care, orthopedics, neurosciences and women's care. The building's design will allow caregivers representing different medical specialties to come together in the same location rather than being housed at different buildings on the hospital's campus and throughout Tacoma.

A unique feature of the Franciscan Medical Building will be its 4 full-service care centers offering primary care medicine, orthopedic services, neuroscience specialists (neurologists, neurosurgeons and physiatrists) and women's care. This arrangement of specialists offers a one-stop medical experience that will benefit doctors and patients.



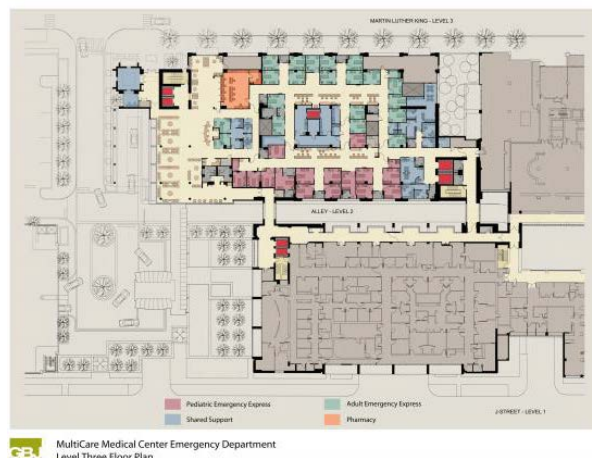
The pedestrian sky-bridge across South J Street will link the new medical office building to the St Joseph Outpatient Center which houses the Walters Day Surgery Center; the Center for Advanced Endoscopy for gastrointestinal procedures; diagnostic imaging; physical, speech and occupational therapies; and other services. The MLK street frontage of the parking garage will include 7,000 square feet of rental retail space to increase pedestrian activities.

MultiCare Health System Women and Children's Community Expansion Project - will remodel and update the areas serving women, newborns and children at Tacoma General Hospital and Mary Bridge Children's Hospital beginning in spring/summer 2012.



The four-year project will add more Pediatric Intensive Care Unit (PICU) beds, a renovated Tacoma General Family Birth Center, and an improved Neonatal Intensive Care Unit (NICU). These areas of the hospital have not been updated for more than two decades, even as the demand for these services is growing. Construction will begin this spring/summer and will generate 350 local jobs during the course of the project.

MultiCare Health System Milgard and Rainier Pavilions - 2 floors will be added to the top of the 5-story Milgard Pavilion, which was built in 2010 and houses the Tacoma General and Mary



Bridge Children's Hospital Emergency Departments and the MultiCare Regional Cancer Center. The new 6th and 7th floors will house Mary Bridge general pediatric beds and the Pediatric Intensive Care Unit.

The Rainier Pavilion - facing Wright Park - will be remodeled and expanded along South 4th Street toward South I Street. The building will house expanded labor and delivery facilities, general medical/surgical units and private Neonatal Intensive Care Unit (NICU) rooms.

Hillside Terrace - Tacoma Housing Authority (THA) will soon initiate redevelopment of its Hillside Terrace site, a 166 unit family and elderly public housing and project-based Section 8 project located on South G Street between 18th and 25th Streets just outside of Hilltop Subarea boundaries.

Hillside Terrace will be redeveloped to provide mixed income housing including units for low and moderate income households. The project will expand unit availability from 104 to 127 units increasing the total from 166 to 189 units in the complex.

The revitalization will provide play areas for children and open space for all residents. The project will also create a community and early learning center with space for community services, family self-sufficiency programs, Head Start, and early learning resources, and classrooms for adult education.



McCarver Elementary School - working with the Tacoma Housing Authority (THA), McCarver Elementary School was accepted as an International Baccalaureate Primary Years Program (IBPYP) Program candidate school and is working toward passing a certification visit during the 2013-2014 school year.

Starting in the fall of 2011, THA provided up to 5 years of rental support for up to 50 families who are homeless or at risk of homelessness and who have a child enrolled in kindergarten

through 2nd grade at McCarver Elementary School in Hilltop.

People's Park Renovations - include perimeter sidewalk repairs, decorative fencing, picnic tables and benches, irrigation upgrades, trees, landscape improvements, new stage at the lower end of the park, and possible relocation of the play area and basketball court. The renovations are being funded by the Parks Improvement Bond Measure, approved by the citizens of Tacoma in November of 2005.

Vue25 Apartments - a mixed use structure with street-level retail and services and upper level market rate studio, 1, and 2 bedroom apartments recently constructed on Yakima Avenue at South 25th Street.



These developments provide the momentum and opportunity to create and implement a revitalization strategy for the Hilltop Subarea.

3.4: Hilltop planning process

Stakeholder focus groups - a series of focus group discussion sessions were conducted in the Peoples Community Center located at 1602 Martin Luther King Jr. Way. During the 3 day period over 45 individuals participated in 13 separate topic focus group discussions. Each focus group session lasted an average 1.5 hours.

The participants were asked to share their concerns, hopes, issues and visions for the Hilltop Subarea. Follow up questions were asked by the consultant team seeking additional clarification. Participants were encouraged to state their views and suggestions even when they strayed from the topics for which the focus groups were initially organized.

The comments and suggestions provided from the focus group sessions are provided in Appendix A of the Draft MLK Subarea Plan.

Internet and mail-back surveys - were conducted for business owners, employees, customers, and adult residents on the city website www.cityoftacoma.com/MLKPlan from January to April 2012. The surveys were completed by 42 Hilltop business owners, 45 employees, 22 customers, and 69 adult residents. The results of the survey are provided in Appendix B of the Draft MLK Subarea Plan.

Charrettes - or brainstorming sessions were conducted on the 22nd of March 2012 with 38 people with consultant facilitators and scribes in classrooms at McCarver School. The participants were self-selected based on invitations emailed to all survey respondents and focus group participants, and the public at large through posters and newspaper notices.

The purpose of the charrette was to solicit likes and dislikes about Hilltop in general, then focus on identifying priorities, results and measurements related to the highest priority topics identified by persons who participated in the customer, employee, business owner, and resident surveys and focus group sessions.

Charrette participants were organized into 2 groups to develop priority results and performance measurements about how the following specific subjects or issues can be improved upon to realize Hilltop's strategic objectives.

The results were transcribed and comments grouped into general headings where the grouping conformed to the intent expressed by brainstorming participants. The results are provided in Appendix C of the Draft MLK Subarea Plan.

McCarver Elementary School student charrette - was conducted at the school after hours during April by University of Washington Tacoma students and Tacoma Planning Division interns. The students were self-selected based on invitations from their teachers.

The purpose of the charrette was to determine their perspectives on Hilltop's existing conditions and their aspirations for the future community.

The results were videotaped and transcribed for review at a subsequent open house for public review and comment.

Open house and survey - was conducted with 55 attendees at Evergreen State College facility on the 24th of May 2012. The results of the

focus group sessions, surveys, and charrette were displayed along with the proposed actions that resulted from the input.

Housing survey - was conducted during August and October of all interested residents, employees of the MultiCare and Franciscan Health Systems facilities, and students of Evergreen State College Tacoma and University of Washington Tacoma.

The internet survey was completed by 98 parties who had an interest in commenting on potential rental or sale housing in a mixed use and income project located within Hilltop with characteristics similar to two examples:

- **Denny Park Apartments** - a 50 unit, 6-story building located a half-block north of Denny Park in Seattle owned and operated by the Low Income Housing Institute (LHI) of Seattle, and
- **Pontedera Condominiums** - a 94 residential unit and 8 live/work commercial loft 6-story building located near Seattle's downtown core developed by HomeSight, a nonprofit developer of workforce housing for first time homebuyers..

Registered voter household survey - was conducted with a representative sample of Hilltop registered voter households to determine their preferences and priorities concerning specific proposals and financing implications of the Draft MLK Subarea plan during the DEIS review process. The results are included in Appendix A of this Final EIS.

3.5: Hilltop vision

The Hilltop Subarea Plan was developed in concert and partnership with and will be implemented by members of the MLK Subarea Plan Working Group - a variety of public, nonprofit, and private parties who have been active in Hilltop for a significant period.

The MLK Working Group defined the vision for Hilltop to be a place where people live, work, and play. Specifically, plan to realize the following key elements:

- **A brand** - that establishes a positive Hilltop image and identity that reflects the community's past and potential.
- **Diverse populations** - including employment, housing, and community services to support all racial, ethnic, and religious populations.
- **Diverse ages** - providing housing and community services to support of all age groups

including youth, young adults, family starters, middle families, empty nesters, and seniors.

- **Diverse households** – providing housing and community services to support all household types including single individuals, couples, single-headed families, and nuclear family households.
- **Mixed income** – with employment and housing opportunities to support of all income levels.
- **Mixed use** – with sufficient retail, commercial, services, offices, and other land uses to support the Hilltop population.
- **Sustainable** – greening the impacts on the environment from human activities using, and creating a community that is fiscally and economically self-sufficient.
- **Respectful** – preserving Hilltop history, landmarks, and culture as the community continues to develop and evolve.
- **An urban form** – that blends the various Hilltop elements including hospitals with single family residences, and major with minor transportation corridors such that Hilltop provides an identifiable and functional form to community residents and the rest of the city.
- **Human-scaled** – such that new infill urban development projects produces mass and form that respects existing developments and a human scale.
- **Public spaces** – incorporating public and privately-accessible open spaces, parks, plazas, special event staging areas, and other features where the community may congregate.
- **Quality architecture** – that respects Hilltop historical buildings and features, a pedestrian scale, and the vistas and viewpoints within Hilltop and with the Downtown and other physical features.
- **Quality streetscape** – incorporating high quality walkways, street trees, artworks, signage, furnishings, and other improvements that appropriate to and unique of Hilltop.
- **Multimodal** – creating a village that promotes walking, biking, and transit as a means of transportation in addition to vehicular.
- **Connected** – using all transportation modes to access Hilltop with the Downtown, South Downtown, and rest of Tacoma.

3.6: Hilltop proposed actions

The proposed Actions represent the consensus opinions of the MLK Subarea Plan Community Working Group as well as the results of the stakeholder focus group sessions, surveys, and charrettes. **The consensus opinion is that these Actions are critical to the effective realization of the Hilltop Subarea Plan's goals.**

The proposed goals and actions are summarized in Table 1 below. The 80 Actions are grouped according to Hilltop Subarea Plan chapters and goals rather than by priority.

The Hilltop Subarea Plan Actions are based on a vision of shared implementation by the whole community, including the City, residents, business owners, cultural organizations, and institutions. For reference, the Draft Subarea Plan and DEIS both include a list of suggested participating parties who would be expected to be involved in implementing each Action. Suggested lead participant(s) (shown in bold) are likely to be primarily responsible for coordinating all of the potential parties to each Action.

All of the Actions are intended to be regularly tracked and evaluated, ideally according to quantifiable metrics. For reference, the Draft Subarea Plan and DEIS both include a list of suggested performance measures for determining the degree to which an Action is effectively implemented.

The MLK Community Working Group will need to determine performance measurement particulars on an ongoing basis to gauge the degree to which each Action is being implemented – including whether the Action, participants, or other specifics need to be adjusted in order to make implementation possible or effective.

NEIGHBORHOOD RESOURCES	
GOAL NR-1	Create local employment opportunities
ACTION NR-1.1	Database: Inventory available mixed use properties, buildings, and resources in the Hilltop Subarea to create a local database with which to identify opportunities during business and developer recruitment efforts.
ACTION NR-1.2	Business outreach: Integrate public, nonprofit, and private business efforts and communications in the economic recruitment process to maximize impacts and allocate resources.
ACTION NR-1.3	Economic sustainability: Recruit businesses that employ technical, professional, and managerial skills offered by and/or able to be developed for Hilltop residents to facilitate live/work sustainability in Hilltop.
ACTION NR-1.4	Medical/health sector: Retain and recruit businesses that support and can expand the health related services and products offered by the MultiCare and Franciscan Health Systems and Community Health Care as well as the growth of these institutions proper in the Hilltop area.
ACTION NR-1.5	Education sector: Retain and recruit businesses that can support and expand on the opportunities created by the association of UW Tacoma, Evergreen State College Tacoma, and Bates Technical College with Hilltop Subarea business and employment development potentials.
GOAL NR-2	Market and develop the Hilltop Business District
ACTION NR-2.1	Marketing: Identify and recruit businesses to fill critical gaps in retail sales and services such as coffee shops and restaurants, entertainment, personal and professional services as well as women's and children's clothing, etc.
ACTION NR-2.2	Design: Initiate a competitive grant and low cost loan program, potentially using BID funds (see also NR-10), to enhance retail storefronts including signage, display windows, building facades, and other improvements, with a focus on the core area around MLK and 11th.
ACTION NR-2.3	Promotion: Initiate and expand retail sales and other events and activities including sidewalk cafes and vendors, farmers' and public markets to attract customers within and into the Hilltop area.
ACTION NR-2.4	Organization: Adopt the National Trust for Historic Preservation's Main Street 4-Point program by the Hilltop Business District Association to organize marketing, design, and promotion strategies.
ACTION NR-2.5	Financing: Adopt a Business Improvement District (BID) or Business Improvement Area (BIA) with which to assess benefiting properties and businesses for the cost of instituting coordinated marketing, design, and promotional activities and physical improvements and maintenance in the Hilltop Subarea.
ACTION NR-2.6	Interim storefronts: Continue working with Spaceworks and other entities to institute temporary artist galleries or similar uses in vacant storefronts or buildings in order to provide visual interest and activity while the building is being marketed for a permanent tenant or owner.

GOAL NR-3	Attract and promote Hilltop arts and cultural resources and potentials
ACTION NR-3.1	Marketing: Conduct regular market surveys of resident and out-of-area attendees to Hilltop community events, festivals, and facilities such as Ethnic Fest, People's Park, People's Community Center, and Wright Park to determine their characteristics, expenditure patterns, sources of information, and other behavior with which to maximize their attraction to Hilltop and their beneficial economic impact on Hilltop businesses and activities.
ACTION NR-3.2	Design: Redefine the Hilltop brand to include arts and historical based themes and install artworks, gateways, way-finding signage, walking tours, maps, and streetscape at the entrances into and of significant landmarks in Hilltop.
ACTION NR-3.3	Promotion: Create a Hilltop arts website and utilize social media such as Google maps, Facebook, and Twitter to announce, promote, and attract out-of-area residents and tourists to an expanded year-round calendar of events and festivals for performing, literary, culinary, fine, and other arts interests.
ACTION NR-3.4	Organization: Create a central clearinghouse organization with which to coordinate schedules, advertisements, events, productions, and other theatrical, literary, culinary, fine, and other promotions in order to maximize Hilltop arts potential and promotional effectiveness.
GOAL NR-4	Preserve Hilltop history and create history and art projects in Hilltop
ACTION NR-4.1	Art and history walking tours: Sign and create audio and phone apps for walking tours of Hilltop historical sites, buildings, and other visually interesting and significant landmarks for local recognitions as well as for historical tourist attractions.
ACTION NR-4.2	Preservation of key historic resources: Complete the ongoing city-wide historic resources inventory and then conduct a focused evaluation of and community discussion about historic buildings within the Hilltop district to identify the most critical buildings to be retained and explore incentives, such as historical transfer of development rights (TDR), and regulatory tools to support their preservation and continued use.
ACTION NR-4.3	Artist live/work: Develop affordable artist live-work-teach-display-sell galleries and workshops as well as live-work housing opportunities to retain and attract young and emerging talent in Hilltop.
ACTION NR-4.4	Farmers/Public Market: Establish a seasonal and possibly year-round farmers/public market with all-weather structures, available parking, and increased visibility to provide expanded access to locally-produced and healthy foods, serve residents and attract out-of-area customers into the Hilltop Subarea.
GOAL NR-5	Engage Hilltop area youth in education, employment, and civic opportunities
ACTION NR-5.1	Education: Expand school/community relations to include volunteer mentor and peer group support with the participation of the Tacoma Public Schools, Tacoma Housing Authority, UW Tacoma, Evergreen State College Tacoma, Bates Technical College, and others to improve educational opportunities, test scores, and the reputation of McCarver School in the community and marketplace.

ACTION NR-5.2	Employment: Create a youth job placement service offering part and full-time internships and employment opportunities with Hilltop businesses and organizations for area youth.
ACTION NR-5.3	Civic participation: Create youth civic participation opportunities where youth can mentor children or adults, promote events or social outreach, construct projects or enhance the environment, network careers or occupations, or create fine and performance art as youth members of Hilltop public and private organizations.
ACTION NR-5.4	Social activities: Expand youth social and recreation oriented activities and facilities that offer evening and after school peer group interactions and events.
GOAL NR-6	Create affordable, mixed-use, mixed-income, and mixed-household housing
ACTION NR-6.1	Housing options: Increase housing choice by type, price, tenure, and location to house a mixed age, household, and income population in or near employment centers, transit corridors, and recreational sites to provide increased live/work/play opportunities in the Hilltop area.
ACTION NR-6.2	Affordable housing: Award additional density, reduced parking requirements, reduced permit fees, and/or other measures for new housing projects that promote rental and sale workforce housing for moderate income working households employed or resident within Hilltop.
ACTION NR-6.3	Distribution affordable housing: Incorporate moderate and low income housing opportunities in mixed use and mixed income building and project developments to avoid concentrating too much subsidized housing in one building or area.
ACTION NR-6.4	Special populations: Continue to provide social services and housing assistance for homeless, addicted, mentally ill, disabled or otherwise medically challenged, and domestic violence individuals and households by MLK social service agencies and organizations.
GOAL NR-7	At least twenty-five percent of the total housing units in Hilltop shall be affordable to households earning up to 80 percent of the countywide median income
ACTION NR-7.1	Establish an affordable housing monitoring system for the Hilltop Mixed-Use Center.
ACTION NR-7.2	Explore the creation of a system that activates policies and regulations designed to promote the production of new affordable housing when affordability trends project a future shortfall.
GOAL NR-8	Enhance Hilltop governance and support Subarea Plan implementation
ACTION NR-8.1	NGO participation: Integrate nongovernmental organizations (NGOs) such as the Hilltop Business District Association, Central Neighborhood Council, Hilltop Action Coalition, and others, including property owners, businesses, residents and significant institutions into the implementation of the Hilltop Subarea plan actions and strategies.
ACTION NR-8.2	Communication: Establish effective public information and feedback materials and conduct frequent town halls, public open houses, and other events at locations in the Hilltop Subarea to encourage public access and facilitate dialogue on Hilltop Subarea Plan implementation policies, programs, projects, and budgets.

ACTION NR-8.3	Strategy development: Extend and coordinate the implementation resources of public, nonprofit, and private organizations to continue strategizing and implementing the Hilltop Subarea Plan.
ACTION NR-8.4	Assess performance results: Conduct regular “State of Hilltop” program, project, and budget assessments including public, customer, and business surveys to determine the effectiveness, performance, and priority of subarea plan actions.
OPEN SPACE	
GOAL OS-1	Expand Hilltop open space, parks, and recreation opportunities
ACTION OS-1.1	Pursue the creation of a green pedestrian connection between Hilltop and the UWT; collaborate with UWT on developing concepts for a hillclimb that will best support an extension all the way into Hilltop; explore potential alignments between Tacoma Way South and MLK Jr Way.
ACTION OS-1.2	Pursue the creation of a green pedestrian connection between Hilltop and the Brewery District, focusing on South 23rd Street as the preferred alignment.
ACTION OS-1.3	Designate a system of coordinated open spaces, conservation corridors, greenways and green streets to link Hilltop parks and community facilities, and connect Hilltop to adjacent neighborhoods, the Prairie Line Trail, UWT, and the Thea Foss Waterway.
ACTION OS-1.4	Plant community or pea patch gardens on vacant sites as well as other available lands within Hilltop to restore habitat, grow healthy foods for local use, and improve visual appearances, in some cases to serve as temporary uses on sites waiting for redevelopment.
ACTION OS-1.5	Complete the planned renovations to the People’s Community Center and Pool.
ACTION OS-1.6	Explore establishing a phased-in development impact fee to fund open space improvements in Hilltop.
ACTION OS-1.7	Depending on the specific location, context, and timing, consider applying the full range of open space strategies listed in the <i>Other Open Space Strategies</i> section of Chapter 4.
GOAL OS-2	Promote Hilltop sustainability opportunities and performance
ACTION OS-2.1	Stormwater: Develop rain gardens, green roofs and walls, bio-filtration swales, and other green development features in and around the Hilltop Subarea’s public facilities and Complete Streets, as well as in new project developments.
ACTION OS-2.2	Develop partnerships and seek funding from the City of Tacoma Public Works Department, the Center for Urban Waters, Citizens for a Healthy Bay, the Puget Sound Partnership, the Department of Ecology, the U.S. EPA, and other organizations to develop natural drainage features in existing and planned open spaces.
ACTION OS-2.3	Native habitat: Plant street trees, reforest open spaces, remove invasive species, and promote use of native and drought resistant plants to restore wildlife habitat in and around Hilltop’s public facilities and within Hilltop’s green, urban, and parkway street corridors.

MOBILITY	
GOAL M-1	Modify traffic management methods in coordination with the City's proposed modifications in Downtown
ACTION M-1.1	Move traffic analysis and mitigation for the Hilltop Subarea from SEPA to new engineering codes.
ACTION M-1.2	Set the motor vehicle level of service standard to LOS "E" and the transit level of service to LOS "D".
ACTION M-1.3	Implement a monitoring program to collect transportation and land use performance data every five years.
ACTION M-1.4	Implement an Adaptive Management and Mitigation Program to address potential future impacts to mobility as the Subarea builds out.
GOAL M-2	Expand pedestrian networks within Hilltop and connections to the rest of the City.
ACTION M-2.1	Initiate a City program to create a prioritized list of pedestrian crossing improvements in Hilltop along with a plan for implementing the improvements.
ACTION M-2.2	Initiate a City program to create a prioritized list of pedestrian connector improvements in Hilltop along with a plan for implementing the improvements.
ACTION M-2.3	Explore potential strategies and collaborations to create pedestrian hillclimbs from the UWT and from the Brewery District.
GOAL M-3	Expand bicycle networks within Hilltop and connections to the rest of the City
ACTION M-3.1	Implement the City's proposed active bicycle infrastructure projects in Hilltop as identified in the Mobility Master Plan, and prioritize the South J Street Bicycle Boulevard.
GOAL M-4	Implement Tacoma's Complete Streets typologies in Hilltop
ACTION M-4.1	Assign Complete Street types to Hilltop streets as illustrated in Figure 5-14 in Chapter 5.
ACTION M-4.2	Implement Complete Streets reconfigurations of Hilltop streets based on a priority that focuses on the MLK Jr Way business district.
ACTION M-4.3	Continue to pursue PSRC prioritization and funding of the MLK District Complete Streets Project.
GOAL M-5	Expand transit/streetcar service in Hilltop
ACTION M-5.1	Continue to support the selection of the North Downtown Central Corridor (E1) alternative for the Sound Transit LINK light rail extension.
ACTION M-5.2	Support a two way alignment on MLK Jr Way for the LINK light rail expansion.

ACTION M-5.3	Actively engage Sound Transit to collaborate on street designs that will most effectively support Hilltop's vision and goals.
ACTION M-5.4	Actively engage Sound Transit to collaborate on station siting and design that will most effectively support Hilltop's vision and goals.
ACTION M-5.5	Retain and expand Pierce Transit's schedules and stops to include hours and routes that support Hilltop employees and residents, particularly at MultiCare and Franciscan Health System's Hospitals, Community Health Care and within the business district core.
LAND USE	
GOAL LU-1	Refine zoning and development regulations for the Hilltop Subarea
ACTION LU-1.1	In recognition of the traditional name for the area and the need for consistent branding, rename the "Martin Luther King Jr. (South 11th & MLK Jr. Way) Mixed-Use Center" to the "Hilltop Mixed-Use Center."
ACTION LU-1.2	Implement the zoning conversions described in the <i>Land Use Code Updates</i> section of Chapter 6.
ACTION LU-1.3	Expand the Hilltop Mixed-Use Center boundary to include the proposed rezone to HMX located west of South L Street and south of Division Avenue.
ACTION LU-1.4	Explore modifications to the administrative design review process that will support the realization of Hilltop's urban design goals and principles.
ACTION LU-1.5	Ground floor retail requirements: Designate Pedestrian Street mixed use ground floor retail requirements to reflect market capacity and desired concentrated retail corridor locations, with a focus on MLK Jr. Way and South 11th Street in the business district core.
ACTION LU-1.6	Design standards: Create and adopt a design overlay for the district that utilizes a hybrid "form-based" approach that illustrates building and street-level design objectives using examples to better address historic character, pedestrian vibrancy, compatibility and design quality issues within a flexible administrative procedure that recognizes innovation.
ACTION LU-1.7	View corridors: Identify public view corridors focused on the key east-west streets in the Hilltop Subarea and create appropriate view protection measures to preserve and protect them.
ACTION LU-1.8	Promote Live-work and Work-live opportunities in Hilltop: Monitor the application of the new codes and suggest improvements; establish a program to promote Live-Work and Work-Live pilot projects in Hilltop; consider permitting assistance, design competitions, and other incentives.

CATALYST PROJECTS	
GOAL CP-1	Implement catalytic development projects in Hilltop
ACTION CP-1.1	Browne's Star Grill/Pochert Building: Subject to feasibility assessments, retain as much of the Browne's Star Grill and Pochert historical buildings as possible and redevelop the remaining city property for mixed use including ground floor retail, upper floor office and/or mixed income housing.
ACTION CP-1.2	MLK Jr Way and 11th Ave Site: Subject to feasibility assessments, support the redevelopment of the vacant properties on MLK Jr. Way and J Street at 11th Avenue for mixed use with ground floor retail, street level artist live/work housing, an educational center, and/or upper floor office and mixed income housing activities and the possible retention and incorporation of the Tally Ho Tavern building.
ACTION CP-1.3	Municipal Service Center: Subject to feasibility assessments, redevelop the city property housing the Municipal Services Center at MLK Jr. Way and South 13th Street for mixed use including ground floor retail with upper floor mixed income housing.
ACTION CP-1.4	Allen Renaissance Center: Promote the sensitive renovation and reuse of the former Valhalla Hall, with the potential for a mix of commercial, residential, institutional, and community spaces.
ACTION CP-1.5	Other Potential Development Opportunities: Promote the redevelopment of underutilized surface parking lots, vacant lands, or underused buildings for new development projects, that help to create a dense mix of uses throughout the district, including retail, restaurants, office, personal services, medical facilities, and mixed-income housing.
ACTION CP-1.6	Coordinated Institutional Development: Work with MultiCare and Franciscan Health Systems and any other significant, campus-like institutions to evaluate more collaborative processes with the city and community, such as development agreements, to better define and support the long-range needs of these institutions, mitigate future development impacts as appropriate, and address how such future development can allow institutions to participate in the revitalization of the Hilltop Subarea. For example, Franciscan Health Systems' long-range plan includes the construction of a new tower to replace the aging iconic tower at S 18th and S J St.
GOAL CP-2	Support the implementation of catalytic infrastructure projects in Hilltop
ACTION CP-2.1	Proactively collaborate with Sound Transit to ensure that the catalytic benefit of the LINK extension is maximized in terms of station design and location, and street reconfiguration.
ACTION CP-2.2	Continue to support the MLK District Complete Streets Improvement Project.
ACTION CP-2.3	Support the implementation of the proposed UWT Hillclimb, and develop concepts for extending the hillclimb further west to connect into Hilltop.
ACTION CP-2.4	Develop concepts for a pedestrian hillclimb/greenway connector between Hilltop and the Brewery District, with primary consideration given to an alignment on South 23rd Street, in coordination with South Downtown planning efforts.

GOAL CP-3	Plan and coordinate infrastructure upgrades and redevelopment
ACTION CP-3.1	Develop a district-wide infrastructure plan sufficient to service the level of development planned for this district, including the undergrounding of power lines in areas where overhead lines conflict with planned development. Prioritize the replacement and upgrading of infrastructure within the Hilltop Subarea, focus infrastructure investments based on economic development opportunities, partner with private property owners and other agencies to coordinate utility projects, and support the use of alternative financing and construction mechanisms, such as local improvement districts (LIDs).
ACTION CP-3.2	Brownfields: Identify all known sites of hazardous materials including former gas stations and laundries, develop appropriate mitigation strategies, and create a funding source for proactively mitigating the sites to support redevelopment.
ACTION CP-3.3	Leverage potential synergies between Hilltop catalytic projects and nearby redevelopment.

3.7: Planned Action Ordinance (PAO)

Alternative 2: Hilltop Subarea Plan includes adoption of a Planned Action Ordinance (PAO), which will encourage redevelopment and revitalization of the Hilltop Subarea, by streamlining the project review process. This EIS identifies impacts of development and specific mitigation measures that developers will have to meet to qualify as a Planned Action project.

According to WAC 197-11-164, a Planned Action is defined as a project that:

- Is designated a Planned Action by ordinance.
- Had the significant environmental impacts addressed in an EIS,
- Has been prepared in conjunction with a comprehensive plan, subarea plan, master planned development, phased project, or with subsequent or implementing projects of any of these categories,
- Is located within an urban growth area (UGA),
- Is not an essential public facility, and
- Is consistent with an adopted comprehensive plan.

This EIS analyzes the Hilltop Subarea Plan and proposed mitigations that will amend current Tacoma plans and regulations and be consistent with the 2011 Tacoma Comprehensive Plan.

Planned Action projects will include new mixed use developments including ground floor retail and pedestrian-oriented activities, platform

building parking decks, and upper floor office and residential uses, as well as local streets, pedestrian walkways and trails, on-road bicycle routes, transit configurations, parks and open space enhancements outlined in the preceding pages.

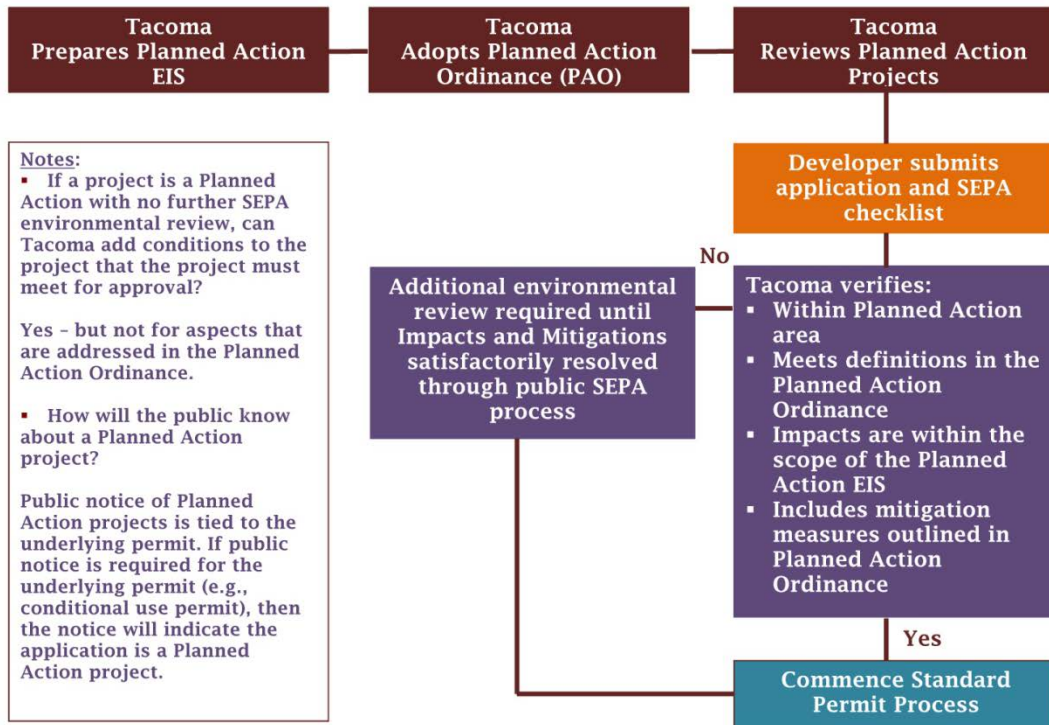
WAC 197-11-168 requires that a Planned Action Ordinance include:

- A description of the components of the Planned Action,
- A finding that the probable significant environmental impacts of the Planned Action have been identified and adequately addressed in an EIS, and
- The identification of mitigation measures that must be applied to a project for it to qualify as a Planned Action project.

Following completion of this EIS process, Tacoma will designate the Planned Action by ordinance. Tacoma will designate as a Planned Action the Hilltop Subarea Plan & Implementing Regulations and Zoning Map amendments pursuant to SEPA and implementing rules.

Planned Action projects will include those identified in this DEIS, excluding essential public facilities. The draft Planned Action Ordinance (PAO) identifies mitigations, as described in this DEIS, that will be applicable to future Planned Action projects. Some of the mitigation measures will apply to all Hilltop Subarea projects, while others will be applied on a case-by-case basis.

Planned Action Project Review Process



4 Responses to letters of comment

Letters of comment were received from the following agencies, organizations, and individuals:

4.1	Richard Petrich	39
4.2	Chris Karnes	41
4.3	Korbett Mosesly	43
4.4	Jori Adkins	45
4.5	Lois Bernstein, Senior Vice President Community Services, MultiCare Health Systems	47
4.6	Marv Coleman and Mike Drumright, Department of Ecology, SW Regional Office	54
4.7	Peter Roach, Just Technologies LLC	58
4.8	Cindy O'Neill	61
4.9	Anthony L-T Chen, MD MPH, Director of Health, Tacoma-Pierce County Health Department - Comment 1	63
4.10	Anthony L-T Chen, MD MPH, Director of Health, Tacoma-Pierce County Health Department - Comment 2	73
4.11	Jane A Moore, MD, Executive Director, ForeverGreen Council	78
4.12	Kevin Grossman, President, Grossman Services, Inc	83
4.13	Tina Lee, Capital Planning Manager, Pierce Transit	87

Each letter of comment and the appropriate responses are provided in the pages following in the order listed above.

From: Petrich, Richard [mailto:RichardPetrich@fhshealth.org]
Sent: Tuesday, December 04, 2012 1:50 PM
To: Boudet, Brian
Cc: Olson, Rick; Wagner, Budd (Tacoma)
Subject: RE: Notice of Availability - Draft MLK Subarea Plan and DEIS

Hi Brian,

I appreciate your forwarding this plan to me. I believe it reflects a great deal of effort on you and your co-workers part. Given that it is a Draft, I can see why the Council may choose not to incorporate the goals at this time. I'm sure that it is not a reflection of their perspective about the long run potential of this subarea to support the future success of the greater Tacoma area.

Thanks, Rich

Action 4: Medical/health sector

Retain and recruit businesses that support and can expand the health related services and products offered by the MultiCare and Franciscan Health Systems and Community Health Care as well as the growth of these institutions proper in the MLK area.

Participating Parties:

Tacoma Community/Economic Dvpm
Tacoma Private Capital Division
Hilltop Business District Assn
Economic Development Board for Tacoma-Pierce County
Tacoma-Pierce County Association of Realtors
MultiCare Health System
Franciscan Health System
Community Healthcare

Performance Measures

hospital and related employees recruited
businesses who locate in MLK citing hospitals
new health related employees involved in new businesses
% new health employees who reside in MLK
% new health employees seek and find housing in MLK

4.1 Response to Richard Petrich

1. Your comment about Council not choosing to incorporate the goals at this time is acknowledged.

In accordance with Chapter 35.63 of the Revised Code of Washington (RCW) and the provisions of the Washington State Growth Management Act (GMA) Chapter 36.70A of the Revised Code of Washington (RCW), Tacoma City Council will conduct public hearings and then decide what to adopt in the Hilltop Subarea Plan.

From: Chris Karnes [mailto:chris.tacoma@gmail.com]
Sent: Thursday, January 03, 2013 9:25 PM
To: Planning
Subject: Draft MLK Subarea Plan EIS - Pierce Transit

Brian Boudet, Urban Planner
City of Tacoma
Community and Economic Development Dept.
747 Market Street, Room 1036
Tacoma, WA 98402

1 Jan 2013

Good day Mr. Boudet-

I have one comment about the MLK EIS. There are maps covering all sorts of transportation modes, but barely a footnote about bus transit. This is a severe omission that impacts how streets should be classified (connector vs. transit priority). It also impacts how MLK will be connected in the future to other neighborhoods and downtown. I recommend adding a description of transit service as it existed in 2007, before serious cuts were made to the network, which impacted the MLK neighborhood. Additionally, I encourage further analysis on part of the City of Tacoma and your consultants to ensure that the appropriate level of service and connections to various neighborhoods and Downtown are emphasized. There is not even a list of routes that run along right of way near MLK or the neighborhoods and destinations that they serve. I consider the lack of sufficient detail about current and proposed bus transit to be a gross oversight that should be remedied before moving this proposed EIS forward.

Other than that, there are only minor changes that I would suggest for the EIS, which I will supply in a later message before the 17th.

Regards,

Chris Karnes

4.2 Response to Chris Karnes

1. Your comment about the transportation maps in the MLK Subarea Plan is acknowledged.

The proposed complete streets designations illustrated on page 47 of the Draft MLK Subarea Plan describe Tacoma's Complete Streets typologies which include Transit Priority Streets as well as Retail/Pedestrian/Transit Streets.

Specific street proposals are illustrated in the graphic on page 46 and described in detail under the proposed Actions 40 and 41 on page 45 of the Draft MLK Subarea Plan.

Proposed Action 46 on page 48 is to retain and expand Pierce Transit's schedules and stops to include hours and routes that support MLK employees and residents, particularly at MultiCare and Franciscan Health Systems Hospitals, Community Health Care, MLK business district, and to UW Tacoma and the downtown.

As described, the Draft MLK Subarea Plan proposes MLK Way be designated a Retail/Pedestrian/Transit Street with the eventual development of a streetcar (or LINK) connection. The Connector Streets on 6th, 9th, 11th, 15th, 17th, 19th, and 25th are proposed to include bus transit stops and service.

The final Hilltop Subarea Plan includes refinements to the street type proposals in the Draft MLK Subarea Plan. These updates are mapped in Figure 5-14 of the Mobility chapter. The proposed complete street types include *Avenue*, *Main St*, and *Transit Priority*, each of which has a design intention to accommodate transit, as detailed in Tacoma's Complete Streets Design Guidelines, and illustrated in the Plan in Figures 5-15, 5-16, and 5-17.

2. Your comment that current Pierce Transit services maps be incorporated into the documents is acknowledged.

Current (2012) Pierce Transit service routes within MLK and between MLK and the downtown as well as other areas in Tacoma and Pierce County are described on pages 168-173 of the Draft MLK Subarea Plan/Planned Action EIS.

The Draft EIS illustrates Pierce Transit's routes on page 170, describes route 2011 volumes on page 171, and the consequences of Proposition 1's potential levy failure on page 172.

The Mobility chapter of the final Hilltop Subarea Plan maps the Pierce Transit lines serving the Hilltop area in Figure 5-6, and also describes the six key lines. The chapter also includes an update on the status of Pierce Transit funding for which, as of Summer 2013, the projection is that current levels of service can be maintained through June 2014.

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

From: Korbett Mosesly [mailto:korbettm@gmail.com]

Sent: Friday, January 04, 2013 7:38 AM

To: Boudet, Brian

Subject: Re: Reminder - Draft MLK Subarea Plan and DEIS

Brian,

I think the City has done a phenomenal job of incorporating the wants and needs of the community in this document. Great Job! Thank you for listening and the great work you and the team have done. This has been a very open and inviting process.

Thanks!

Korbett Mosesly
Communication Consultant
Tacoma, WA 98405
253.655.7452
Korbettm@gmail.com

4.3 Response to Korbett Mosesly, Communication Consultant

1. Your comment commending the MLK Subarea Plan process communications is acknowledged.

From: joriadkins@mac.com
Sent: Thursday, January 17, 2013 10:48 AM
To: Planning
Cc: Boudet, Brian
Subject: Comments on MLK Subarea Plan/EIS

The Plan has all the right stuff in it. But, once this good Plan is adopted, will the City sit back and wait for developers to come or are they getting ready to give MLK a good kick start by renovating the Brown Star buildings or putting them out for RFP with design & time guidelines attached? And the MLKHDA Lots and the Save-ALot underutilized land? I think it is very important to do something concrete that comes out of the Plan as soon as possible.

When I see the words "Subject to feasibility assessments.." with each of these items, I become skeptical that something other than words will come of this Plan.

When I talk to the few developers I know they only see nothingness along MLK (similar to the Dome District).

Only the City can get the ball rolling. The City needs to use what they have, which is the Brown Star and any influence they have on the other large pieces of land within the Subarea, to get something started. Maybe the Goal: *Implement MLK Catalytic Development Projects* should be moved from the second to last item to close to the top of the list to show the commitment of the City to making MLK turn around.

It can't rely on small new businesses to make it happen. The city needs to give them the concrete resources of buildings and the people that come with them to sustain these young new businesses which will be the life blood of the District once it is going.

Thank you for the opportunity to comment on the MLK Plan/EIS.

Jori Adkins
Dome District

4.4 Response to Jori Adkins, Dome District

1. Your comment concerning kick-starting the development of the Browne's Star Grill, MLKHDA, and Save-A-Lot sites is acknowledged.

Proposed Actions 52, 53, 54, and 56 to implement the redevelopment of the Browne's Star Grill/Pochert Building, Municipal Service Center, MLKHDA, and other private properties (including Save-A-Lot and Safeway, among others) are described on pages 52 and 56 of the Draft MLK Subarea Plan. The performance measures listed for each action include the completion of feasibility assessments, issuance of RFPs, selecting a developer, and determining project success.

The Catalyst Project chapter of the final Hilltop Subarea Plan includes several updates and additions intended to help kick start redevelopment. There is a new section on *Strategies* that includes initial recommendations of the ULI Rose Fellowship, Public-private partnerships, Developer RFPs, Land Acquisition, Public Development Authorities, Community Development Corporations, Adaptive Reuse, and Attracting Investment. There are new 3-D illustrations of potential buildout scenarios on Hilltop catalyst redevelopment sites. There is a new section describing catalytic infrastructure projects that would help support private investment in redevelopment. And lastly, there is a discussion of the important role of brownfield cleanup.

2. Your comment on "subject to feasibility assessments..." is acknowledged.

Feasibility assessments in each case include resolution of economic pro forma ensuring the projects are viable, obtaining clear title to properties in order to solicit RFPs and development, and obtaining satisfactory responses from qualified and desirable developers.

3. Your comment on city action to initiate these projects is acknowledged.

Each action includes the designation of lead agents shown in gray highlight as well as other participants who will be affecting on or by the implementation of the action.

As shown in the Draft MLK Subarea Plan, Tacoma City Council, Tacoma Community/Economic Development

Department, and Tacoma Housing Authority are listed as lead agents on the Browne's Star Grill/Pochert Building and Municipal Service Center since the city owns these properties and can initiate action upon the adoption of the Draft MLK Subarea Plan.

The Tacoma Housing Authority and Evergreen State College are listed as lead agents on the MLKHDA property, which is complicated by the outstanding loans and grants issued by Washington State to MLKHDA for the acquisition and development of the property as an MLKHDA project.

Private property owners and the Tacoma Community/Economic Development are listed as lead agents on other private property opportunities which would include Save-A-Lot and Safeway as well as others. Actions on these properties will depend on the interest and action of these private property owners accordingly.

4. Your comment concerning city support of new small business startups is acknowledged.

In the Draft MLK Subarea Plan, Action 2 Business Outreach on page 19 and 6-10 on Marketing, Promotion, Design, Organization, and Financing on page 21 identify the supporting services and lead agents and participants designated to support new and small business startups in MLK.

In the final Hilltop Subarea Plan, recent small business successes in Hilltop are highlighted in the Context chapter, and the success of Spaceworks Tacoma in launching new small businesses in Hilltop is highlighted in the Neighborhood Resources chapter.



MultiCare Allenmore Hospital
MultiCare Auburn Medical Center
MultiCare Good Samaritan Hospital
MultiCare Mary Bridge Children's Hospital & Health Center
MultiCare Tacoma General Hospital
MultiCare Clinics

January 17, 2013

Brian Boudet
Urban Planner
Community and Economic Development Dept.
City of Tacoma
747 Market Street, Room 1036
Tacoma, WA 98402

RE: Draft MLK Subarea Plan and Draft Environmental Impact Statement (EIS)

Dear Brian,

Thank you for the opportunity to submit written comments regarding the draft MLK Subarea Plan (Plan) and draft Environmental Impact Statement (EIS). As you may know, MultiCare Health System has been very involved in this process attending many of the community forums, workshops, and stakeholder meetings. As the City continues to finalize these documents, I hope you will take into consideration and seek further input from affected parties the issues identified below.

MultiCare is a not-for-profit, integrated health care system that is committed to providing care and services to improve the health and well-being of the people in our community and the region. With roots in Tacoma dating back to 1882, we are honored to serve individuals and families throughout the South Puget Sound region. We greatly appreciate the trust that our community places in us. With more than 10,000 employees, MultiCare is the largest private employer in Pierce County and we strongly believe in fostering partnerships neighbors, local and regional governments, educational institutions, businesses and other community organizations to further serve the needs of our community.

MultiCare has worked hard to balance the health care needs of the community with available resources and we look to the City of Tacoma as a valuable partner in this process. We need to anticipate the region's future growth patterns in our planning while also maintaining a balance with our neighbors and community. As such, below is some feedback regarding the Plan and EIS:

- For Goal #51 on Hospital Planning and Coordination (Plan, p. 58 – and noted at other points, including Mitigation Measures, p. 135 of the EIS) – we would recommend removing the word “more” before the word “collaborative.”

315 Martin Luther King Jr. Way PO Box 5299 Tacoma, WA 98415-0299 p 253.403.1000 multicare.org



MultiCare Allenmore Hospital
MultiCare Auburn Medical Center
MultiCare Good Samaritan Hospital
MultiCare Mary Bridge Children's Hospital & Health Center
MultiCare Tacoma General Hospital
MultiCare Clinics

- MultiCare supports pedestrian and bicycle path concepts for the community, but favors the path diverging to I Street to mitigate the impact to emergency vehicles, and encourage the natural adjacency of Wright Park's pedestrian and biking connection. Any pedestrian and/or bicycle path should be diverted from J Street to I Street prior to crossing 6th Avenue due to the impact on emergency vehicle traffic. This is a critical traffic and patient safety issue.
- Speed bumps, traffic circles, and other traffic "calming" mechanisms, which are necessary for pedestrian paths, are not viable in streets required for patient and emergency transportation. Again, this is a critical traffic and patient safety issue.
- We strongly oppose the revision of HMX zoning to RCX zoning as contemplated in Alternative 2: MLK subarea plan (page 134). Among other things, this aspect of Alternative 2 would appear to result in a down zoning of existing MultiCare properties, potentially creating nonconforming use status for MultiCare's parking structure and other uses. The draft EIS does not discuss, disclose or substantiate the impacts from the proposed down-zone changes. Although MultiCare has no current plans to expand its hospital and medical facilities in these areas, the *current* hospital and medical zoning for the properties adjacent to South I Street is consistent with the comprehensive plan, as well as sound planning and development principles.
- The expansion of the HMX zoning contemplated in Alternative 2 may or may not be appropriate. As noted by the City, the properties encompassed by this expansion "are viable and supportable for hospital related developments." It is not clear, however, what the impact might be from rezoning properties from HM to HMX.
- Finally, it also is not clear what the impacts are from the contemplated rezoning of properties adjacent to South M Street from HM or HMX to residential or commercial zoning designations. The EIS does not discuss the impacts from these proposed zone changes.



MultiCare Allenmore Hospital
MultiCare Auburn Medical Center
MultiCare Good Samaritan Hospital
MultiCare Mary Bridge Children's Hospital & Health Center
MultiCare Tacoma General Hospital
MultiCare Clinics

Again, we appreciate the opportunity to offer comments on the Plan and EIS. We look forward to working with you and our neighbors to develop a plan that works for all concerned. We would be happy to provide additional written and oral comments and would appreciate the opportunity to be involved in further developments related to this effort.

Sincerely,

A handwritten signature in black ink that reads "Lois Bernstein".

Lois Bernstein
Senior Vice President, Community Services
MultiCare Health System

CC: T.C. Broadnax, Tacoma City Manager
Ricardo Noguera, Director, Community and Economic Development Dept.



MultiCare Allenmore Hospital
MultiCare Auburn Medical Center
MultiCare Good Samaritan Hospital
MultiCare Mary Bridge Children's Hospital & Health Center
MultiCare Tacoma General Hospital
MultiCare Clinics

April 10, 2013

Brian Boudet, Urban Planner
City of Tacoma, Community and Economic Development Dept.
747 Market Street, Room 1036
Tacoma, WA 98402

Dear Mr. Boudet:

7

Thank you for meeting with representatives to discuss our comment letter dated January 17, 2013. We were concerned about several issues, including the revision of HMX zoning to RCX zoning in Alternative 2. We now understand that the MLK Alternatives would not result in a down zoning of any MultiCare properties and no nonconforming use situations would be created. This addresses one of our primary concerns. To the extent this could be further confirmed in the FEIS or record, would be appreciated. We do remain concerned about the other issues raised in our letter, such as the emergency vehicle access and pedestrian safety. We look forward to continued participation in this planning effort.

Sincerely,

Lois Bernstein
Senior Vice President, Community Services
MultiCare Health System

4.5 Response to Lois Bernstein, Senior Vice President, Community Services, MultiCare Health System

1. Your comment concerning removing the word “more” before the word “collaborative” is acknowledged.

“More” in this instance was assumed to mean “continuing”. Your preference to remove or replace the word “more” is hereby incorporated into this Planned Action EIS.

2. Your comment concerning moving the pedestrian and bicycle designation from J Street to I Street is acknowledged.

Pedestrian trails and sidewalk network proposals are described under Action 35 on page 39 and illustrated on page 40 of the Draft MLK Subarea Plan. As shown, major pedestrian corridors in the MultiCare area are designated to be Division, MLK Way, 6th Street, and I Street/Yakima Avenue. J Street is not proposed to be a major pedestrian corridor other than local hospital related sidewalk access.

Bicycle network proposals are described under Action 38 on page 42 and illustrated on page 43 of the Draft MLK Subarea Plan. The actions are in accordance with the adopted Tacoma Mobility Master Plan which designated major bicycling corridors through the city based on desired bicycle destinations, existing traffic volumes and street activities, and other features.

The Mobility Master Plan selected J rather than I Street due to high traffic volumes and congestion on I Street adjacent to Wright Park and the extension of I Street as Yakima Avenue as a principal vehicular corridor through the city. Due to the extension of I Street as Yakima Avenue, I Street is not connected across 6th Avenue.

The Mobility Master Plan also designated J rather than I Street because it remains on the top of the hill, links bicycles with major destinations in MLK, and has a wider pavement.

In concept, the Mobility Master Plan proposes to designate a bike lane between the traffic lane and parking, or adjacent to the curb where there is no curbside parking aisle. Expected bike traffic volumes will be low, less than currently using J Street through MultiCare for vehicular access and through traffic. Potential conflicts between bicyclists and emergency vehicles would likely be no more and even less than could occur with vehicular traffic.

Nonetheless, the proposals are conceptual and will involve detailed planning and evaluation with affected property owners. As stated in Action 38 on page 42, the city will “Develop the J Street bike boulevard in conjunction with MultiCare and Franciscan Health Systems to account for emergency access to the hospitals.”

The final Hilltop Subarea Plan includes the following language addressing potential conflicts between the needs of the hospital facilities and the proposed Bicycle Boulevard on South J Street:

“Since the proposed Bicycle Boulevard bisects the Subarea’s two major medical institutions, careful design will be required to balance the needs of cyclists with the needs of the users of the Franciscan and MultiCare healthcare complexes that front on South J Street. Both hospitals use South J Street for emergency vehicle/ambulance access, which often involves time-critical situations. The final alignment and design for those sections must be closely coordinated with the medical facilities to ensure there are no significant impacts to hospital operations, particularly emergency vehicle access.”

3. Your comment concerning speed bumps, traffic circles, and other traffic “calming” mechanisms as not being viable for emergency transportation corridors is acknowledged.

There are no explicit proposals in the Draft MLK Subarea Plan to install speed bumps, traffic circles, or other traffic calming mechanism on J Street through the MultiCare or Franciscan Health System campuses. Although the City’s definition of a Bicycle Boulevard notes that they may contain traffic calming elements, these elements are not required. As noted above in the response, the final Hilltop Subarea Plan commits to collaboration with MultiCare to ensure that emergency vehicle access is not compromised.

4. Your opposition to Alternative 2: MLK Subarea Plan’s proposed revision of HMX zoning to RCX zoning on page 134 of the Planned Action EIS to acknowledged.

Action 51 on page 52 of the Draft MLK Subarea Plan proposes to “Work with MultiCare and Franciscan Health Systems and any other significant, campus-like institutions to evaluate more collaborative processes with the city and community, such as development agreements,

to better define and support the long-range needs of these institutions, mitigate future development impacts as appropriate, and address how such future development can allow institutions to participate in the revitalization of the MLK district.”

The lead agents for this proposed action are the Tacoma City Council, Tacoma Community/Economic Development Department, Tacoma Planning Commission, MultiCare Health System, and Franciscan Health System with Hilltop Business District Association, the Central Neighborhood Council, New Tacoma Neighborhood, and other participants.

This proposed action will implement Tacoma Comprehensive Plan’s policies and goals for the McCarver District described on page 116 of the Draft Planned Action EIS that states “...It is intended the area provide new higher density residential development, especially east of South J Street. Also, the hospital and medical facilities should complement adjacent commercial and residential uses. In addition, a master plan for the hospital and medical center should be developed or updated.”

The proposed rezoning of the lands around MultiCare are described on page 15 and illustrated on page 16 of the Draft Planned Action EIS – not page 134 of the Draft MLK Subarea Plan. As stated on page 15:

“HMX zoning and MLK subarea boundaries will be expanded west – to include MultiCare Health System properties that have been acquired west of South L Street and north of South 6th Avenue that are viable and supportable for hospital related developments.

HM and HMX zoning will be revised – west of South L and M Streets to C-2 commercial and H-4 and H-4L high density housing to reflect existing uses in these parcels that are not owned by MultiCare Health Systems and which are not viable or necessary to an viable MultiCare hospital plan.

HMX zoning will be revised – along the east boundary with South I Street to exclude the churches and existing apartment buildings located on Division Avenue and I Street/Yakima Avenue that are not owned by MultiCare Health Systems and which are not viable or necessary to a functional MultiCare hospital plan. These properties would be rezoned RCX to reflect current and future church and residential uses.”

The proposed rezoning recommendations in the Draft Planned Action EIS are in accordance with the Comprehensive Plan policies for the McCarver District and reflect current MultiCare ownership and stated hospital requirements.

City Council will ultimately decide whether these rezoning and subarea boundary redesignation recommendations are to be implemented.

5. Your comment concerning whether the potential appropriateness of HM or HMX rezoning per Alternative 2: MLK Subarea Plan is acknowledged.

HM (Hospital Medical District) Zone - is described on page 13-98 of Title 13 Tacoma Land Use Regulations under 13.06.200.B.4 HM Hospital Medical District as...” intended for limited areas that contain hospitals and/or similar large scale medical facilities with limitations on non-medical uses to only allow uses which may serve typical needs of medical centers such as food and lodging. It is not intended for introduction into areas not containing or non-contiguous to a hospital or similar facility. Residential uses are also appropriate. This classification is not appropriate inside Comprehensive Plan designated low-intensity areas.

HMX (Hospital Mixed Use) Zone – is described on page 13-105 of Title 13 Tacoma Land Use Regulations under 13.06.300.8 Mixed-Use Center Districts as “...intended for limited areas that contain hospitals and/or similar large-scale medical facilities along with a dense mix of related and supportive uses, such as outpatient medical offices, care facilities, counseling and support services, medical equipment and support facilities, food and lodging. Residential uses are also appropriate. The district includes limitations on non-medical and non-related uses. It is not intended for introduction into areas not containing or non-contiguous to a hospital or similar facility. Walking and transit use is facilitated through designs which decrease walking distances and increase pedestrian safety. This classification is not appropriate inside Comprehensive Plan designated low-intensity areas.”

As described, HMX zoning allows a broader range of hospital and medical related uses and developments than HM and provides a greater assurance that hospital developments are the foremost use.

City Council will ultimately decide whether these rezoning and subarea boundary redesignation recommendations are to be implemented

6. Your comment concerning the impacts of rezoning properties adjacent to South M Street from HM or HMX to residential or commercial zoning designations under Alternative 2: MLK Subarea Plan is acknowledged.

The proposed rezoning of the lands around MultiCare are described on page 15 and illustrated on page 16 of the Planned Action EIS. As stated on page 15:

“HM and HMX zoning will be revised - west of South L and M Streets to C-2 commercial and H-4 and H-4L high density housing to reflect existing uses in these parcels that are not owned

by MultiCare Health Systems and which are not viable or necessary to an viable MultiCare hospital plan.”

The proposed rezoning reflects the existing ownership and use of these properties. The impacts of the rezone are not expected to be different than what currently exists. Under the rezone, these property owners could expect to use their properties as currently developed.

City Council will ultimately decide whether these rezoning and subarea boundary redesignation recommendations are to be implemented.

7. The comments in your second/updated comment letter, dated April 10, 2013, indicating that you do not have any concerns about any of the rezones proposed in the Draft MLK Subarea Plan, are acknowledged.



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

January 17, 2013

Brian Boudet, Urban Planner
City of Tacoma
Community & Economic Development
747 Market Street, Room 1036
Tacoma, WA 98402

Dear Mr. Boudet:

Thank you for the opportunity to comment on the draft environmental impact statement (DEIS) for the MLK Subarea Plan project located centered on Martin Luther King Jr Way from Division Avenue to south of South 23rd and South 27th Streets. The Department of Ecology (Ecology) reviewed the information provided and has the following comment(s):

TOXICS CLEANUP: Marv Coleman (360) 407-6259

Portions of the project area are within the Tacoma Smelter Plume. At the time of individual project development, compliance with Ecology's Total Suspended Particulates (TSP) protocols should be followed. In the acronym section of the DEIS, several acronyms were incorrectly cited. Best Management Practices (BMP) should be best management practices; total suspended particulates (TSP) should be; total suspended particulates; Total Maximum Daily Load (TMDL) should be total maximum daily load.

WASTE 2 RESOURCES: Mike Drumright (360) 407-6397

We encourage the applicant to consider incorporating the principles of smart growth, urbanism and green building in order to reduce the impacts from the development. Please refer to the techniques referenced in the Leadership in Energy and Environmental Design (LEED)® for Neighborhood Development rating system. The LEED checklist can be an effective design guide for environmentally responsible, sustainable development. Achieving any of the various levels of LEED certification indicates a comprehensive effort to reduce overall environmental impacts from building construction and operation, and can be attractive to potential tenants.

For assistance and additional information on incorporating green building techniques and sustainable building materials in the project, please contact Ariona with Ecology's Waste 2 Resources program at (360) 407-6351.

January 17, 2013
Page 2

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

(CR/SM:12-6017)

cc: Ariona, W2R
Marv Coleman, TCP
Mike Drumright, W2R



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 17, 2013

Brian Boudet, Urban Planner
City of Tacoma
Community & Economic Development
747 Market Street, Room 1036
Tacoma, WA 98402

Dear Mr. Boudet:

The Department of Ecology (Ecology) reviewed the draft environmental impact statement (DEIS) and submitted comments on January 17, 2013. Since then, our Toxics Cleanup Program has revised their comments for the MLK Subarea Plan project located centered on Martin Luther King Jr Way from Division Avenue to south of South 23rd and South 27th Streets. Comments below are based on that revision:

TOXICS CLEANUP: Marv Coleman (360) 407-6259

Portions of the project area are within the Tacoma Smelter Plume (TSP). At the time of individual project development, compliance with Ecology's TSP protocols should be followed. In the acronym section of the DEIS, several acronyms were incorrectly cited. Best municipal practices (BMPs) should be best management practices; total suspended particulates should be; total suspended particulates; (TMDL) total maximum daily demand should be total maximum daily load. U.S. Department of Ecology should be Washington State Department of Ecology.

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:12-6017)
Revised

cc: Marv Coleman, TCP

4.6 Response to Marv Coleman and Mike Drumright, Washington State Department of Ecology, SW Regional Office

1. Your comment concerning compliance with Ecology's Total Suspended Particulates (TSP) concerning the Tacoma Smelter Plume is acknowledged.

Your corrections to the acronym section of the DEIS are acknowledged and hereby incorporated into this Planned Action EIS.

2. Your comment concerning incorporating the principles of smart growth, urbanism, and green building using the LEED checklist are acknowledged.

Action 33 on page 39 of the Draft MLK Subarea Plan will use "...rain gardens, green roofs and walls, bio-filtration swales, and other green development features in and around MLK's public facilities and within MLK's green and urban streets as well as in new project developments."

Examples of the application of these green principles are illustrated in pages 36-37 of the Draft MLK Subarea Plan.

Page 96 of the Draft Planned Action EIS lists the environmental and smart growth principles that will be adhered to in conformance with Tacoma Chapter 4 Environmental Element policies.

Pages 105-109 of the Draft Planned Action EIS list the smart growth and urbanism principles to be followed in the infill and redevelopment of higher density sustainable living in the MLK Subarea in accordance with affordable housing, community and urban design, economic development and employment, health and well-being, among others of Puget Sound Regional Council (PSRC) and Countywide Planning Policies for Pierce County (CWPP).

Page 158-159 of the Draft Planned Action EIS lists the green and low impact development principles that will be adhered to in conformance with Tacoma Comprehensive Plan's Housing Preservation (HP) policies.

The Context chapter of the final Hilltop Subarea Plan describes the LEED for Neighborhood Development workshop that was conducted for the Hilltop Subarea in April 2012. It highlights

the following key opportunities for guiding future growth in a way that improves the sustainability of the community over time:

- Improving multi-modal linkages, particularly to the downtown
- Ensuring development enhances a dense, mixed-use, pedestrian-friendly character
- Expanding access to green space, recreation, and healthy food
- Providing incentives for the construction of "green" buildings
- Developing "green" infrastructure projects to address issues such as storm water control, water conservation, and energy

3. Your comment in your revised letter, dated December 17, 2013, concerning incorrectly cited acronyms in the Draft Planned Action EIS is acknowledged.

Your corrections to the acronym section of the DEIS are acknowledged and hereby incorporated into this Planned Action EIS.

From: peter.roach@justtechnologies.org
Sent: Saturday, January 26, 2013 11:38 AM
To: Planning; bboudet@cityoftacoma.org
Subject: MLK Subarea Plan - Urban Farming

Hello Mr. Boudet,

I wanted to provide you with my feedback regarding the current MLK Subarea Plan. Reviewing the current draft, it appears there are many challenges for this project and I'd like to assist your team with overcoming several of those challenges. I work in the Hilltop area and witness the needs inherent in that community daily. Moreover, I am very optimistic and share your vision for a thriving MLK region with a richly connected community.

On review of the current MLK subarea plan I don't see food scarcity, "food deserts", or community health significantly called out. Further, in that plan, I am concerned it lacks focus on physical ecology, healthy eating, and environmental stewardship. My vision for this area is one that pulls residents into the community spaces, offers healthy food choices, works with the community Anchor Businesses (Hospitals, Jail, Government) to generate employee owned (Hilltop residents) businesses that serve those community Anchor Businesses.

One area of MLK business growth I would like to lead is Urban Farming. Urban Farming has been proven many times over to assist with city food sustainability, integrating communities, and improving community health. Currently, I am researching areas in the MLK corridor that are between 1/8 to 1/2 acre in size. I'd like to piece together about 2 acres of land across the MLK area to build out an Urban Farm that feeds families in Hilltop area and serves businesses throughout Tacoma. Likewise, I'd like that farm to act as a job training site, creating other Urban Farmers (businesses).

Tying my vision and project into the MLK Subarea Plan, I am wondering if a couple points could be added to the Subarea Plan which would foster Tacoma's food sustainability and a healthy social ecological environment. Specifically:

- 1) Adding an incentive for property owners (commercial and residential) to welcome Urban Farmers. That is, could the city reduce property taxes for those offering their land for use by a registered Urban Farming business.
 - I have been speaking with the property owner of the derelict land (6000' SQ.) on the corner of 9th. and J st. He would let me use this land, but the property taxes are too much. Hence, it will sit in it's current state until it sells.
- 2) What could the city do to help foster the start-up of a Farmers Market? I wonder if we could a create simple storefront in the Browne's Star Grill site? Turning that into a storefront where Urban Farmers could market their goods. Also, we could add a kitchen setting where we could teach health cooking to area residents.
- 3) Could there be synergies between other areas of Tacoma's revitalization efforts? For example, could the City of Tacoma lease out the vacant land in the Brewer's district to Urban Farming businesses?

To help broaden your understanding of my motivation, I'd like you to review a recent [New Yorker Magazine article \("Adaptation"\)](#) written by Eric Klinenberg. In this article he discusses how [Urban Farming](#) is being used to broaden community engagement and better prepare Chicago for Natural Disaster situations.

Here are a couple other relevant links:

a. PBS interview of Eric Klinenberg - http://www.pbs.org/newshour/bb/entertainment/july-dec02/klinenberg_11-27.html

b. Impact of Urban Farming in New York - http://sustainablecitiescollective.com/node/81916?utm_source=feedburner_twitter&utm_medium=twitter&utm_campaign=autotweets

c. Chicago's Urban Farm District - <http://grist.org/food/chicago-urban-ag-farm-district-could-be-the-biggest-in-the-nation/>

In closing, please included me in any work-groups your creating to finalize the MLK Subarea Plan and I look forward to helping Tacoma grow and become a healthier place to live.

Thank You.

Peter Roach

[Just Technologies LLC](#)

253-234-5578

4.7 Response to Peter Roach, Just Technologies LLC

1. Your comment concerning the lack of comment on food scarcity and community health is acknowledged.

Action 29 described on page 35 and illustrated on page 39 of the Draft MLK Subarea Plan community garden initiatives including to "...Plant community or pea patch gardens in vacant or undeveloped building sites as well as other available lands within MLK to restore habitat, grow healthy foods for local use, and improve visual appearances.

Action 29 designates Tacoma Open Space Program, Forever Green Council, and Metro Parks Tacoma as lead agents with the Sustainability Commission, Tacoma-Pierce County Health Department, and Tahoma Audubon Society as participants.

The Context chapter of the final Hilltop Subarea Plan provides a review of the City's September 2012 *MLK District Healthy Community Evaluation*.

2. Your comment concerning local business development opportunities in MLK is acknowledged.

Action 3 on page 19 of the Draft MLK Subarea Plan describes economic sustainability objectives including to "Recruit businesses that employ technical, professional, and managerial skills offered by area residents to facilitate live/work sustainability in MLK. Action 3 designates Tacoma Community/Economic Development, Tacoma Private Capital Division, and Hilltop Business District Assn as lead agents and the Economic Development Board for Tacoma-Pierce County, Tacoma-Pierce County Association of Realtors, and Private property owners as participants in this effort.

The Context chapter of the final Hilltop Subarea Plan provides an overview of the current business climate in Hilltop, and also highlights recent business successes.

3. Your proposal to establish an Urban Farming operation in MLK is acknowledged.

See comment 1 above.

4. Your proposal to add an incentive for Urban Farming potentially at the corner of 9th Avenue and J Street including the possible tax

abatements and other measures is acknowledged.

Tacoma currently provides incentives for affordable housing and historic preservation among other objectives. Your proposal would be considered by City Council accordingly.

5. Your proposal to foster the start-up of a Farmers' Market including possible use of a storefront in the Browne's Star Grill is acknowledged.

Action 27 on page 35 of the Draft MLK Subarea Plan will "Establish a seasonal and possibly year-round activity with all-weather structures, available parking, and increased visibility to provide expanded access to locally-produced and healthy foods, serve residents and attract out-of-area customers into MLK for this purpose."

Action 27 designates Hilltop Business District Assn and the Tacoma Farmers' Market as lead agents and Tacoma Community/Economic Development, Metro Parks Tacoma, and the Tacoma Arts Administrator as participants in this action.

6. Your comment concerning possible synergies between the MLK and South Downtown Subarea Plans is acknowledged.

See comment 1 above concerning Urban Farming potential in the Draft MLK Subarea Plan. The South Downtown Subarea Plan identifies Community Gardens as a relatively longer term need that can be added incrementally as growth and demand dictate.

The Open Space chapter of the final Hilltop Subarea Plan includes proposals for "green" connectors to South Downtown near the UWT campus and along South 23rd Street. These connectors would about appropriate locations for urban farming activities.

7. Your listing of relevant reference links concerning Urban Farming and offer to participate in future MLK Subarea Plan implementation actions is acknowledged.

Contact the lead agents listed under comment 1 and 5 above about participating in Hilltop actions and implementations.

From: cindy_oneill@comcast.net [mailto:cindy_oneill@comcast.net]
Sent: Sunday, January 27, 2013 2:06 PM
To: Planning
Subject: Draft MLK Subarea Plan Comments

Brian Boudet, Urban Planner
City of Tacoma
Community and Economic Development Dept.
747 Market Street, Room 1036
Tacoma, WA 98402
Phone #: 253.573.2389
Fax #: 253.591.2002

Dear Mr. Boudet:

My name is Cindy O'Neill and I am a property owner just outside of the limits of the MLK subarea, on 13th street. I was involved in the process at the focus group level and am super excited to see the result of the entire process.

I went through the plan and am impressed with the result. It is comprehensive, easy to read and understand, offers many options along the way and stresses the importance of a holistic approach through it's articulate and thorough dipiction of the proposed effects on the existing local community. The plan conveys to me the same level of importance to each of the goals that I felt while involved in the process and that is great to see.

Thank you so much for your continued dedication to the future of our city and my community.

Thanks,
Cindy O'Neill

4.8 Response to Cindy O'Neil

1. Your comment concerning your participation in the development of the Draft MLK Subarea Plan and your support of its actions and objectives is acknowledged.



Governed by a local Board of Health

January 29, 2013

Mr. Brian Boudet
City of Tacoma, Community and Economic Development Department
747 Market Street, Room 1036
Tacoma, WA 98402

Re: Draft MLK Subarea Plan EIS Comments

Dear Mr. Boudet:

Thank you for the opportunity to contribute our comments on the Draft MLK Subarea Plan EIS. We have focused our review on air, water and land impacts. We hope the comments will help the future build-out of the area proceed more smoothly and better address long-term public health concerns, risks, and benefits.

We appreciate the extensive coverage of air, water, and earth protective policies. The length, breadth, repetition, and technical language may discourage all but the most tenacious reader, however, from reading and supporting the plan. We recommend that you produce a concise and locally relevant EIS that would help community members understand the environmental, health and other impacts of the plan they were involved in developing. This approach also would offer a more accurate reflection of the level of community engagement practiced during the planning process.

As noted in the draft EIS, reducing fine particulate air pollution from wood stoves, transportation, construction, and other sources is a health priority in Tacoma and Pierce County. Not specifically addressed, however is how the plan will help with implementation of the Carbon Monoxide (CO) maintenance plan, or the Fine Particulate Matter (PM_{2.5}) Attainment State Implementation Plan. Specifically, will the plan incorporate "wood burning management controls"?

We are also concerned about the assumption that the plan build-out will not have "... any significant unavoidable adverse impacts on regional or local air quality." This seems to be based upon other easily challenged assumptions, given budgets, drive alone, and commute trip reduction rates, such as:

- More people and vehicles, but lower CO emissions from better engine technology and implementation of the maintenance plan;
- Funding of Pierce Transit, Streetcar/Link, and other improvements; and
- Reduced car use and increased transit use.

We have attached additional detailed suggestions. Please contact Rob Olsen at (253) 798-2855 or rolsen@tpchd.org if you have any questions or would like to discuss our suggestions. Thank you for giving us the opportunity to help you improve livability, health, and prosperity of our community.

Sincerely,

Anthony L-T Chen, MD, MPH
Director of Health

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AIR**4.3.1: Affected environment****Meteorology**

- In the Puget Sound region fine particle pollution, air toxics and ozone are our greatest air quality concerns (<http://www.pscleanair.org/airq/basics/health.aspx>). In the past Pierce County air quality did not meet federal standards for ozone, carbon monoxide, and PM₁₀. More recently it has not met PM_{2.5} standards.

Carbon monoxide (CO)

- Short-term standards exist for additional air pollutants, such as other criteria pollutants: <http://www.ecy.wa.gov/programs/air/sips/pollutants/naaqs.htm>.
- Concern should also be determined by long-term health exposures and risks.

Particulate matter (PM)

Language should be stronger and consistent with City of Tacoma and other agencies' language:

- Over the last few years air quality has not met federal health-based standards for fine particulate matter, resulting in increased risk for respiratory, cardiovascular and other illnesses and death. Risks are highest for sensitive populations, but also for healthy people.
- Ultrafine particle health risks have also been identified by EPA and others – please see <http://www.epa.gov/research/airscience/air-pmhealthoutcomes.htm>.

PM...among the most harmful of all air pollutants

- Major sources should be reordered with the largest urban sources listed first, since MLK is an urban area.

Air Quality Index

- The Air Quality Index measures levels of 6 criteria pollutants. Fine particles and ground-level ozone are the pollutants that show up the most on the AQI for the Puget Sound region. (<http://www.pscleanair.org/airq/basics/aqi.aspx>)
- "Burn ban" is the term more often used in our area, rather than "burn day." (<http://www.pscleanair.org/airq/status.aspx>)

Greenhouse gas and climate change

- Assumption that proposed project/plan will result in more vehicles, but lower CO emissions due to better engine technology and implementation of maintenance plan. How will the MLK Subarea Plan help with implementation of the maintenance plan?

4.3.2: Impacts

- Given the population, density, traffic and construction increases expected, what information is the EIS conclusion below based on?
However, considering the relative magnitude of proposed development activities, it is unlikely that the volume of urban activity within the MLK subarea will create air pollutant conditions to a point where EPA, Ecology, or PSCAA standards will be at risk.

4.3.4: Unavoidable adverse impacts

- How well founded is the assumption that walking, biking, and transit use will increase, and resulting air pollution will not be “of any significant unavoidable adverse impacts on regional or local air quality”?

WATER

4.4.1 Affected environment

P. 81, 2nd, 6th and 7th paragraphs: language is not consistent with common understanding and language. We recommend replacing those paragraphs with:

Contamination resulting from historical activities may be contained on-site and remediated through soil excavation, disposal and replacement. In some cases contaminants may have migrated laterally and/or vertically beyond the shallow subsurface or property boundary, resulting in the contamination of groundwater, adjacent properties and underground utilities. Larger-scale contamination may require enhanced investigation and remediation techniques.

Also, while beneficial for understanding greater-Tacoma and regional water processes and associated risks, much content is devoted to STGPD water issues, and some to Eastern Washington issues. Since no part of the MLK Subarea is located within STGPD, this information may be confusing, unless those references are being used to promote STGPD-like protections within MLK area.

TRANSPORTATION

4.9.3 Mitigation measures

Identify areas with higher pedestrian, bicyclist, and motor vehicle injury rates and prioritize these areas for investments that improve safety. Track rates before and after improvements. This will help achieve Target Zero goals.

4.9 Response to Anthony L-T Chen, MD, MPH, Director of Health, Tacoma-Pierce County Health Department

1. Your comment concerning the production of a locally relevant and understandable EIS for community members is acknowledged.

The Draft Planned Action EIS properly cites local, regional, state, and national sources and authorities concerning earth, air, and water conditions within the MLK Subarea and the policies and procedures which these agencies use to regulate local earth, air, and water conditions and mitigations.

The descriptions of air conditions in particular include nontechnical definitions and examples that are cited in the publicly disseminated materials used by these agencies as well as your own.

Tacoma's Comprehensive Plan Chapter 4 Environmental Element is the principal source of the policies that govern earth, water, and air impacts and mitigations.

2. Your comment concerning the implementation of the Carbon Monoxide (CO) maintenance plan and the Fine Particulate Matter (PM2.5) Attainment State Implementation Plan is acknowledged.

As noted on page 62 of the Draft Planned Action EIS, "Three agencies have air quality jurisdiction in the Tacoma/Pierce County area - the US Environmental Protection Agency (EPA), Washington State Department of Ecology (Ecology), and the Puget Sound Clean Air Agency (PSCAA).

As noted on page 63 under Pierce County's air quality "Most of Pierce County was designated a nonattainment area for fine particle pollution in 2009, becoming one of 32 nonattainment areas in the country and the only nonattainment area in the state. This means that fine particle pollution levels too frequently exceeded the national limit, posing public health risks.

These pollution levels are so high that they violate the Clean Air Act and have resulted in the area being designated as a "nonattainment area" by the EPA. This designation requires completion of a regulatory plan to clean up the problem and carries stricter rules for businesses and industry within the area. By law, Pierce County is required to clean up the air by 2019.

PSCAA is working with Ecology, with input from the Tacoma-Pierce County Clean Air Task Force, to develop a plan to reduce pollution from all sources, particularly wood smoke. The specific actions to reduce wood smoke pollution are still being finalized, but will likely closely follow the Tacoma-Pierce County Clean Air Task Force's recommendations to enhance enforcement of burn bans and require removal of older, more polluting "uncertified" wood stoves."

On page 61 under Fine particle pollution, "Dust, soot, smoke are all considered "particulate matter," and one of the 6 criteria air pollutants monitored and regulated by the PSCAA under the Clean Air Act."

On pages 64-65 under Tacoma-Pierce Clean Air Task Force recommendations: "PSCAA formed the Tacoma-Pierce County Clean Air Task Force - a diverse cross-section of community leaders representing Pierce County residents including those who heat their homes with wood, business, government and health and who volunteered their time and input to explore meaningful, yet achievable ways for Pierce County to improve its air quality.

The Task Force explored over 60 possible tactics for reducing fine particle pollution from wood-burning, transportation and goods movement activities. With technical guidance provided by the Puget Sound Clean Air Agency staff to assess the feasibility, cost, and potential air quality benefits, the Task Force honed in on 3 primary strategies.

Because fine particle pollution comes from a variety of sources, these strategies target multiple sectors, including wood smoke from residential home heating, and emissions from transportation and industrial sources.

...Solution 1: Enhance Enforcement of Air Quality Burn Bans

Goal: Ensure that those who are contributing the most to the fine particle pollution during periods of the poorest air quality reduce their emissions.

Under Washington State law, PSCAA can temporarily ban the use of wood-burning heating devices when air pollution reaches, or is expected to reach, unhealthy levels. To improve the effectiveness of air quality burn bans, the Task Force recommended:

☐ Expanded education and outreach. The Task Force agreed that community education about burn bans.

□ Increased enforcement of burn bans. This includes leveraging part-time personnel to enforce burn bans, exploring technologies to improve evening enforcement of burn bans, and adjusting the criteria for when burn bans are called to more effectively protect health.

Solution 2: Require the Removal of Uncertified Wood Stoves and Inserts by a Certain Date

Goal: Remove the older, more polluting wood stoves and inserts from the nonattainment area. Wood stoves and inserts manufactured prior to 1988 produce more pollution and are less efficient than more modern devices. These stoves and inserts are called uncertified devices. There are approximately 24,000 of these old, high-polluting, uncertified devices in the nonattainment area. Removing these devices would effectively reduce fine particle pollution in the long run.

The Task Force recommended establishing a clear date by which time all residents will need to remove their uncertified wood stove or insert. They proposed the end of August 2015. To date, more than 1,200 of these devices have been removed and replaced under a prior voluntary PSCAA program.

Solution 3: Reduce Pollution from Gasoline Vehicles, Diesel Vehicles, Industries, Ships

The Task Force recommended continued implementation of rules and support for programs and initiatives that target pollution reductions from transportation and industrial sources.

Approximately 25-33% of the emission reductions needed to meet the fine particle pollution standard by 2019 will be accomplished from new federal regulations and local initiatives related to non-wood smoke sources of pollution (vehicles, ships, etc.). Most of these regulations and initiatives are in the process of being implemented.

Vehicle sources - nationally, the focus for reducing fine particle pollution related to gasoline vehicles has been on creating cleaner standards for both engines and fuels.

Washington State has adopted the California Clean Car Standards for vehicles, the most stringent automobile standards in the country.

These standards will help to reduce fine particle pollution.

Local governments have adopted several programs to reduce fine particle pollution related to gasoline engines, including installing electric vehicle charging stations, using electric and biodiesel vehicles, and adopting anti-idling programs.

The regional transportation plan adopted by the Puget Sound Regional Council has several policy goals that will help reduce fine particle pollution even further.

A number of planned transportation capital investments will also help, such as high occupancy vehicle (HOV) lane extensions, ramp metering, Sound Transit Sounder rail improvements, and investments in alternative means of travel.

In addition, the task force suggested continued education efforts that encourage individual car and truck owners to take actions to reduce pollution emissions (e.g. anti-idling initiatives).

Industrial sources - among the industrial sources of fine particle pollution in the nonattainment area, there are 6 that have been identified by Ecology and PSCAA as the largest industrial emitters of fine particle pollution. Collectively, these 6 sources contribute more than 90% of the industrial fine particle pollution from industrial sources in the nonattainment area.

The federal Clean Air Act establishes a requirement for working with industries to reduce their levels of pollution called Reasonably Available Control Technology (RACT).

Engineering staff at Ecology and PSCAA are reviewing the existing pollution controls and operations at these 6 industrial sources to determine if they already meet RACT. A preliminary analysis indicates that most, if not all, of the sources do.

For ocean-going ships, new international standards require use of lower sulfur fuel, beginning in 2012 and moving to much stricter levels by 2015. These cleaner fuels will reduce the fine particle pollution from ships.

The Port of Tacoma and its tenant, Totem Ocean Trailer Express (TOTE), have also installed shore power facilities and retrofitted ships so that ships can use shore power instead of operating diesel engines to create power when at berth.

Adoption

The Task Force transmitted its recommendations to PSCAA in December 2011. PSCAA's board of directors will review the report and make recommendations to Ecology. Ecology will conduct further analysis and prepare a State Implementation Plan (SIP). There will be opportunities for public review and comment on the Plan.

Because any local rules or state laws required for the solutions will need to be in place before the SIP is submitted to the EPA, PSCAA will seek state legislation in 2012 to clarify its existing authority for implementing the recommended solutions.

Ecology must submit the SIP to the EPA by December 2012 for their review and approval. At the same time, PSCAA will be developing plans and implementing actions to improve air quality in the nonattainment area.

Attainment timeline

2006	Health studies cause EPA to tighten standard for fine particle pollution
December 2009	EPA designates Tacoma-Pierce County as a nonattainment area
Summer 2011	PSCAA convenes Tacoma-Pierce County Clean Air Task Force
Fall 2011	Clean Air Task Force makes recommendations to PSCAA
Winter 2011/2012	PSCAA submits recommendations to Ecology
December 2012	Ecology submits State Implementation Plan to EPA
2014	Target for Tacoma-Pierce County nonattainment area to reduce fine particle pollution to meet federal standard
2019	Final deadline to meet federal standard for fine particle pollution

3. Your comment concerning the assumptions about the plan build-out not having "...any significant unavoidable impacts on regional or local air quality"...being based upon other easily challenged assumptions, given budgets, drive alone, and commute trip reduction rates is acknowledged.

On page 74 of the Planned Action EIS under Air quality "Both alternatives will increase urban development, motor vehicle traffic, and resulting air pollution but not of any significant unavoidable adverse impacts on regional or local air quality."

This assumption is based partly on the actions being taken that are summarized under Comment 2 above, and upon the transportation analysis on page 168 of the Planned Action EIS "Tacoma conducts concurrency tests of the city's transportation network on a periodic basis, using the EMME/2 computerized transportation model...Concurrency assessments are part of the ongoing travel demand forecasting process that incorporates the following elements:

- ☐ Trip Generation - which estimates the trips produced by and attracted to each transportation analysis zone (TAZ);
- ☐ Trip Distribution - which link the trip ends from trip generation to form matrices of zone-to-zone travel demand;
- ☐ Traffic Assignment - which determines zone-to-zone travel routes over the transportation network and accumulates the zone-to-zone travel demand (by mode) using each network segment; and
- ☐ Mode Split - which estimates how much of the total zone-to-zone travel demand uses each mode of travel available.

The forecasting is conducted using the EMME/2 model, in cooperation and coordination with the models used by Pierce County and the Puget Sound Regional Council (PSRC). In addition to travel demand forecasting, EMME/2 is also used in traffic impact analyses for specific projects or development proposals, in order to determine the need for mitigation and maintain the concurrency requirements."

On page 176 of the Planned Action EIS under Projections "In January 2012, Tacoma requested the Puget Sound Regional Council (PSRC) assist with the evaluation of local and regional transportation impacts of alternatives for the South Downtown and MLK Subarea Plans by forecasting travel patterns utilizing the PSRC's travel demand model. (Grant funding that the city received from PSRC for the subarea plans was not sufficient to accomplish this type of analysis)."

The results of the PSRC projections and PSRC's underlying assumptions are provided in the Tacoma South Downtown Subarea Plan/EIS. . The Mobility chapter of the final Hilltop Subarea Plan provides a summary of the results of the modeling.

4. Your comment concerning Meteorology fine particle pollution, air toxics, and ozone is acknowledged.

See the response to comment 2 above. Your internet link for additional information is hereby incorporated into this Planned Action EIS.

5. Your comment concerning Carbon monoxide (CO) and standards for additional air pollutants is acknowledged.

See the response to your comment 2 above. Your internet link for additional information is hereby incorporated into this Planned Action EIS.

6. Your comment concerning Particulate matter (PM) and the City of Tacoma and other agencies language is acknowledged.

See the response to your comment 2 above. Your internet link for additional information is hereby incorporated into this Planned Action EIS.

7. Your comment about PM...among the most harmful of all air pollutants and that major sources should be reordered is acknowledged.

Air quality standards are listed on page 62 and 63 of the Draft Planned Action EIS in the order that Washington State has established in their tables on additional ambient standards. Washington State's listing is not meant to imply which standards are the most significant or which sources are the largest.

8. Your comment about the Air Quality Index is acknowledged.

Your notation that the Air Quality Index measures levels of 6 criteria pollutants, that fine particles and ground-level ozone are the pollutants that show up the most on the AQI for the Puget Sound Region, and the internet link to AQI is hereby incorporated into this Planned Action EIS.

Your correction of the term "burn day" to "burn ban" and the internet link is hereby incorporated into this Planned Action EIS.

9. Your comment concerning greenhouse gas and climate change assumptions and maintenance is acknowledged.

See the response to your comment 3 concerning greenhouse gas and CO emissions.

As noted under mitigations for Both alternatives on page 71 of the Planned Action EIS under Development-related GHG reduction measures

"...Both alternatives will require development permit applicants (including Tacoma and other public and nonprofit agencies) to identify GHG reduction measures included in their projects and explain why other measures are not included or are not applicable in accordance with the following Ecology GHG reduction measures" (see list on page 71).

On page 74 under Tacoma's Climate Action Plan "Tacoma's Mayor established the city's commitment to reducing greenhouse gas emissions when the mayor signed the US Mayors Climate Protection Agreement in April 2005, pledging that Tacoma would strive to meet or exceed the reduction target set in the Kyoto Protocol to cut emissions by 7% from 1990 levels by 2012.

A Green Ribbon Climate Action Task Force was appointed by the City Council in February 2007. The task force was charged with defining carbon reduction goals, and developing specific community and government action plans to achieve those goals.

The task force reviewed Tacoma's emissions inventory, considered other scientific data, and studied climate action plans from other cities, as well as state and regional efforts. The task force looked at regional and national models, and identified the unique opportunities presented in Tacoma.

Task force members identified more than 80 strategies to reduce greenhouse gas emissions. These included about 40 new strategies, in addition to actions in progress or soon to be implemented, and strategies that couldn't be numerically quantified with a specific carbon savings.

The task force gathered public feedback on the proposed strategies through a series of public meetings, by attending community meetings, and from an internet survey. After reviewing all of the input, the task force adopted its final recommendations in May 2008.

Tacoma's GHG emission reduction goals

Tacoma's 1990 estimated greenhouse gas emissions level was 1,990,830 tons¹, based on an emissions inventory conducted in 2007. Because Tacoma has already implemented a series of sustainability programs, the city is on pace to reduce its emissions by 104,775 tons by 2012, which is more than 5% of Tacoma's 1990 estimated emissions level.

The Green Ribbon Climate Action Task Force recommended:

By 2012 - Tacoma's greenhouse gas emissions should be reduced to 15% below 1990 levels or by 214,373 tons below the level of emissions predicted for 2012.

By 2020 - Tacoma's greenhouse gas emissions should be reduced to 40% below 1990 levels or to a total of 1,194,498 tons, or by 712,081 tons below emissions predicted for 2012.

By 2050 - Tacoma's greenhouse gas emissions should be reduced to 80% below 1990 levels or to a total of 398,166 tons, which or by 1,508,413 below emissions predicted for 2012...

Tacoma's Climate Action Plan includes a recommendation for an implementation structure designed to ensure that the strategies are successfully executed, and a 2-year action plan identifying the steps to be taken during 2009-2010.

As noted on page 76 under mitigations of the MLK Subarea Plan "In addition to the mitigation measures listed under both alternatives, Alternative 2: MLK Subarea Plan will also implement the following measures to mitigate impacts on air and GHG conditions by reducing vehicular traffic and particulate matter (PM), carbon monoxide (CO), and ozone (O3) air pollution potentials.

3: Economic sustainability - recruit businesses that employ technical, professional, and managerial skills offered by MLK residents to facilitate live/work sustainability in MLK.

16: Housing options - increase housing choice by type, price, tenure, and location to house a mixed age, household, and income population in or near employment centers, transit corridors, and recreational sites to provide live/work/play sustenance in MLK.

17: Affordable housing - award additional density, reduced parking requirements, reduced permit fees, and/or other measures for new housing projects that promote rental and sale workforce housing for moderate income working households employed or resident within MLK.

34: Walkways and sidewalks - improve and complete key connections on 11th, 15th, 19th, 25th Streets, and MLK Way from the neighborhoods to the west of MLK, and from MLK to the downtown, UW Tacoma, Thea Foss Waterway, and other major walking destinations including a Safe Routes to School program for

McCarver Elementary School.

37: Bikeway network - institute the bike lanes on 6th, 11th, 19th, and 25th Avenues, I Street and Yakima Avenue, and bike boulevard on J Street to complete key connections to MLK business district, schools, parks, and other major commuter and recreational destinations as well as with the downtown and larger city system. Develop the J Street bike boulevard in conjunction with MultiCare and Franciscan Health Systems to account for emergency access to the hospitals.

44: Streetcar (LINK) - re-install historical streetcar (or LINK) service on MLK from Division Street south to 23rd in shared lanes with vehicles or in a dedicated median lane with stops at MultiCare Health System, Peoples Park, MLK Business District, People's Community Center, Franciscan Health System, and 23rd Street.

45: LINK - expand LINK light rail service to MLK on the north from Stadium Way and Division, or the south from 27th-25th to create a shuttle loop service with the Sound Transit and Amtrak connections at Freighthouse Square in the Dome District, and from MLK to UW Tacoma, Thea Foss Waterway, and downtown. Also allow for future potential expansions west into the neighborhoods.

46: Pierce Transit - retain and expand Pierce Transit's schedules and stops to include hours and routes that support MLK employees and residents, particularly at MultiCare and Franciscan Health Systems Hospitals, Community Health Care, MLK business district, and to UW Tacoma and the downtown."

10. Your comment concerning the relative magnitude of proposed development activities contemplated in the MLK subarea is unlikely to create air pollutant conditions to a point where EPA, Ecology, or PCSAA standards will be at risk is acknowledged.

See the response to your comment 2 concerning current air quality conditions in Tacoma and the MLK subarea and the State Implementation Plan (SIP) which has been created to attain EPA, Ecology, and PCSAA standards.

As noted under 4.3.2 Impacts on page 68 "Both alternatives will continue development of the lands within the MLK subarea for urban uses and activities to various intensities including the generation of localized air pollutant emissions associated with automobile traffic,

industrial manufacturing, and construction activities.

Additional urban activities and accompanying automobile traffic will produce and increase suspended particulate (PM10), ozone (O3), and carbon monoxide (CO) content within the local area, particularly along MLK Way, Yakima Avenue, and other connector road corridors.

However, considering the relative magnitude of proposed development activities, *it is unlikely that the volume of urban activity within the MLK subarea will create air pollutant conditions to a point where EPA, Ecology, or PSCAA standards will be at risk.*

The proposed build-out in the Draft MLK Subarea Plan is not substantially greater than the existing zone allowances which were covered in Tacoma's Climate Action Plan. Therefore, it is reasonable to assume that even though increased development in the MLK subarea will increase possible air pollutant conditions that increase is not likely to be significant enough in and of itself to exceed or risk standards.

11. Your comment concerning the assumption that walking, biking, and transit use will increase and resulting air pollution will not be of any significant unavoidable adverse impact is acknowledged.

See the response to your comments 3 and 10 above. As noted on page 77 under 4.3.4 Unavoidable impacts Air quality "Both alternatives will increase urban development, motor vehicle traffic, and resulting air pollution but not of any significant unavoidable adverse impacts on regional or local air quality.

Alternative 2: MLK Subarea Plan, however, will develop walkways and streetscapes, bikeway networks, streetcar or LINK light rail connections, local live/work sustainability employment and housing that will reduce dependence on vehicular traffic and associated carbon monoxide (CO) and ozone (O3) production."

12. Your comment concerning alternative language for Water 4.4.1 Affected environment on page 81 of the Planned Action EIS is acknowledged and hereby incorporated as a replacement to the paragraphs cited.

13. Your comment concerning discussion of greater-Tacoma and regional water processes being confusing since the MLK subarea is not

located within the South Tacoma Groundwater Protection District (STGPD) is acknowledged.

A single paragraph on east Cascade Mountains surface runoff is cited on page 82 to provide a point of comparison with the surface water runoff rates on the west side of the Cascades.

The reference to the South Tacoma Groundwater Protection District (STGPD) on page 85 of the Planned Action EIS states that "In 1988, Tacoma adopted the South Tacoma Groundwater Protection District, which is codified in Chapter 13.09 of the Tacoma Municipal Code. The provisions of this Chapter are implemented principally by the Tacoma-Pierce County Health Department, in cooperation with Tacoma Water Division, Tacoma Public Works Environmental Services Division, and others.

This regulation addresses business use and handling of hazardous materials within the South Tacoma area. In addition, the ordinance contains spill prevention and management requirements as well as certain restrictions on specific 'high-risk' commercial and industrial land uses. Stormwater infiltration is generally prohibited within the South Tacoma Groundwater Protection District due to the potential movement of contaminants to the underlying aquifers."

The map on page 79 indicates that the STGPD boundaries extend east to Yakima Avenue indicating the MLK subarea is within the STGPD area.

14. Your comment concerning adding a mitigation measure under Transportation 4.9.3 to include the identification of higher pedestrian, bicyclist, and motor vehicle injury rates and the prioritization of these areas of investments that improve safety and to track rates before and after improvements as a means of achieving Target Zero goals is acknowledged.

Your proposal is hereby incorporated into this Planned Action EIS.



Governed by a local Board of Health

January 29, 2013

Mr. Brian Boudet
Community and Economic Development Department
City of Tacoma
747 Market Street, Room 1036
Tacoma, WA 98402

Re: Draft MLK Subarea Plan Comments

Dear Mr. Boudet:

Thank you for the opportunity to contribute our comments on the Draft MLK Subarea Plan. We hope our perspective will assist project leaders as they plan for an effective future build-out of the area that will better address long-term public health concerns, risks, and benefits.

The draft plan contains an inspiring vision as well as specific goals and actions that will contribute to the MLK area's future livability and prosperity: strong businesses, youth, arts, history, sense of place, identity, parks, green infrastructure, Complete Streets, Safe Routes to Schools, and Green Streets. The performance measures will help track and communicate progress toward goals.

The actions included in the plan to improve pedestrian, bicycling, and transit facilities will also contribute to livability, health and prosperity. Given Pierce Transit and City of Tacoma budget challenges, however, we have concerns about connectivity between the different transportation modes. Our recommendations include:

- Ensure that Link, streetcar, and bus schedules are coordinated to improve connectivity;
- Improve connectivity on the south end of the proposed streetcar and bicycle routes; and
- Increase the number of "local streets" with improvements to enhance neighborhood connectivity and redesign.

Your thoughtful inclusion of a variety of organizations and individuals in the planning process as well as in the youth civic participation section in the draft will certainly contribute to the success of this project. To that end, we recommend that actions to ensure continued broad community participation are added to the plan. Involvement of organizations and individuals, especially underserved populations, is critical to ensure that future developments meet community needs and are successful. We have attached additional detailed suggestions.

We look forward to continuing to work with you to better improve benefits and reduce risks associated with this project. Please contact Rob Olsen at (253) 798-2855 or rolsen@tpchd.org if you have any questions or would like to discuss our recommendations and suggestions.

Sincerely,

Anthony L-T Chen, MD, MPH
Director of Health

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Throughout plan: label examples and best practices sidebars as such.

Suggestions below refer to: S = plan strategy/action #, p = plan page #

- p. 2: MLK Plan objective: Add inspirational statement that captures vision, addresses growth mentioned in previous section: "Achieve vision through local improvements, enabling present and future MLK residents, businesses and organizations to thrive."
- p. 5: Vue25 photo doesn't show pedestrian friendly frontage – is this what plan is aspiring to? Note this or change photo to show other street with hopefully more pedestrian friendly frontage.
- S 6: Ensure gaps identified in surveys are included.
- p. 25: Goal – add "healthy" after affordable.
- p. 27: Special populations – are there other special populations that the plan would like to include? People with disabilities and other medical challenges come to mind, especially given the health care facilities in MLK.
- p. 35: Goal – replace "parks and recreation" with "healthy living"
- S 27: Move this strategy under the new goal "Expand MLK healthy living opportunities" since access to healthy food choices supports "healthy living"
- S 28: Add measure: # people reported enjoying greenways, open spaces.
Encourage urban parks such as plazas and linear urban open space in new developments.
- S 30: Ensure these uses include uses and needs identified by residents through past visioning and surveys.
- p. 41: Goal - add "environmental" before sustainability.
- S 32: Add measure: # volunteer hours.
- S 33: Remove "public" – should be encouraged for all facilities.
- S 40: Add measure: # pedestrians reported before/after.
- p. 48: Ensure this provide good connectivity for bikes and fits with Mobility Master Plan.
- S 46: Add: Identify sustainable funding options.
- S 51: Add at end: "and contribute to the health of patients, employees, and residents."
- S 57: Remove "significant"
- S 58: Add "priorities" after implementation

MLK Subarea Plan Draft Additional Suggestions

January 2013

S 60: Add at end "and how they are addressing community needs."
Add measure: "# of identified community needs being met."

p. 63: Note that changes to existing facilities within the plan will still need to meet all applicable regulations.

Page 2 of 2

4.10 Response to Anthony L-T Chen, MD, MPH, Director of Health, Tacoma-Pierce County Health Department - Letter 2

1. Your comment concerning coordinating pedestrian, bicycle, and transit facilities, particularly LINK and Pierce Transit, is acknowledged.

LINK expansion planning is described on page 186 of the Draft Planned Action EIS "Over the next 12 months (all of 2013) Sound Transit in cooperation with the City of Tacoma and Pierce Transit will engage the wider community to help identify a range of alternatives, study these alternatives, and determine a preferred corridor alternative for the expansion. The study will also produce a project financing plan that will identify committed and potential funding sources."

The routes identified in the Pre-Alternatives Analysis shown in page 187 and described on page 188 "...built upon work completed in 2004, 2005, and 2008 for extending the Tacoma Link streetcar and evaluated 8 potential extensions of the Tacoma Link system. The evaluation included an assessment of potential benefits and impacts of each corridor, engineering constraints, design assumptions, preliminary cost estimates, and potential funding sources..."

However, of all 8 corridors, the North Downtown Central Corridor (MLK subarea) would serve the largest population in 2040. It would also serve a high number of existing and forecast jobs, as well as a high percentage of low-income and minority residents. This corridor would also serve a large number of community institutions. It would travel through 4 historic districts including Old City Hall, Wright Park and Seymour Conservatory, Stadium-Seminary, and North Slope."

Current (2012) Pierce Transit service routes within MLK and between MLK and the downtown as well as other areas in Tacoma and Pierce County are described on pages 168-173 of the Planned Action EIS.

Pierce Transit's routes are described on page 172 including route 2011 volumes on page 174, and the consequences of Proposition 1's potential levy failure on page 175.

Pedestrian trails and sidewalk network proposals are described under Action 35 on

page 44 and illustrated on page 45 of the Draft MLK Subarea Plan.

Bicycle network proposals are described under Action 38 on page 47 and illustrated on page 48 of the MLK Subarea Plan. The proposals are in accordance with the adopted Tacoma Mobility Master Plan which designated major bicycling corridors through the city based on desired bicycle destinations, existing traffic volumes and street activities, and other features.

Nonetheless, these proposals are conceptual and will involve detailed planning and evaluation as LINK and Pierce Transit plans are finalized.

The final Hilltop Subarea Plan adds "ACTION M-14: Actively engage Sound Transit to collaborate on street designs that will most effectively support Hilltop's vision and goals."

2. Your comments concerning continued and broad involvement of community groups in the MLK implementation actions are acknowledged.

Actions 57-60 on pages 62 of the Draft MLK Subarea Plan describe the measures to be taken to improve MLK governance including:

"57: NGO Participation - Integrate nongovernmental organizations (NGOs) such as the Hilltop Business District Association, Central Neighborhood Council, Hilltop Action Coalition, and others into the implementation of MLK subarea plan actions and strategies.

58: Communication - Establish effective public information and feedback materials and conduct frequent town halls, public open houses, and other events at locations in the MLK subarea to encourage public access and facilitate dialogue on MLK Subarea Plan implementation policies, programs, projects, and budgets.

59: Strategy Development - Extend and coordinate the implementation resources of public, nonprofit, and private organizations to continue strategizing and implementing the MLK Subarea Plan.

60. Assess Performance Results - Conduct regular State of MLK program, project, and budget assessments including public, customer, and business surveys to determine the effectiveness, performance, and priority of subarea plan actions."

3. Your suggestion concerning an inspirational statement on page 2 of the Draft MLK Subarea Plan objective is acknowledged.

Your proposal is hereby incorporated into this Planned Action EIS.

4. Your comment concerning Vue25 photo on page 5 of the Draft MLK Subarea Plan and lack of pedestrian friendly frontage is acknowledged.

Vue25 is included because it is a recent development project being completed within the MLK subarea and not because it has any design characteristics to emulate.

5. Your comment concerning ensuring that retail gaps identified from Action #6 Marketing on page 17 of the Draft MLK Subarea Plan are included is acknowledged.

6. Your proposal to add “healthy” into the Goal “Create affordable, mixed use, mixed income, and mixed household housing” on page 25 of the Draft MLK Subarea Plan is acknowledged.

Your proposal is hereby incorporated into this Planned Action EIS, and was updated in the final Hilltop Subarea Plan.

7. Your proposal to add people with disabilities and other medical challenges to Action 19 on page 27 of the MLK Subarea Plan is acknowledged.

Your proposal is hereby incorporated into this Planned Action EIS, and was updated in the final Hilltop Subarea Plan.

8. Your proposal to replace “parks and recreation” with “healthy living” in Goal: Expand MLK parks and recreation opportunities on page 31 (not 35) of the Draft MLK Subarea Plan is acknowledged.

“Parks and recreation” were the goal statement terminology developed during the MLK planning process and will remain such to retain the community’s input.

9. Your proposal to move Action #27 Farmers’/Public Market on page 31 of the Draft MLK Subarea Plan to the Goal: Expand MLK parks and recreation (healthy living) opportunities is acknowledged.

10. Your proposal to add performance measure “people reported enjoying greenways, open spaces” and “encourage

urban parks such as plazas and linear urban open space in new developments” to Action 28 on page 31 of the Draft MLK Subarea Plan is acknowledged.

Your proposal is hereby incorporated into this Planned Action EIS.

11. Your proposal to ensure that uses include uses and needs identified by residents through past visioning and surveys in Action 30 on page 31 of the Draft MLK Subarea Plan.

In the Draft MLK Subarea Plan, Action 30 proposes to “Redevelop the green space in front of People’s Community Center into a more formal plaza type park with picnic shelters, tables, benches, splash fountain, and play equipment in accordance with the proposals in the People’s Community Center master plan.”

People’s Community Center Master Plan documented the community input and proposals that were developed during that process.

12. Your proposal to add “environmental” before “sustainability” to the Goal: Promote MLK sustainability opportunities and performance on page 41 of the MLK Subarea Plan is acknowledged.

Your proposal is hereby incorporated into this Planned Action EIS.

13. Your proposal to add performance measure “# of volunteer hours” to Action #32 Native Habitat on page 41 of the Draft MLK Subarea Plan is acknowledged.

Your proposal is hereby incorporated into this Planned Action EIS.

14. Your proposal to remove “public” from Action 33 on page 41 of the Draft MLK Subarea Plan is acknowledged.

Action 33 states “Develop rain gardens, green roofs and walls, bio-filtration swales, and other green development features in and around MLK’s ~~public~~ facilities and within MLK’s green and urban streets as well as in new project developments.”

Your proposal is hereby incorporated into this Planned Action EIS, and was updated in the final Hilltop Subarea Plan.

15. Your proposal to add performance measure “# pedestrians reported

before/after” to Action #40 MLK retail/pedestrian/transit on page 47 of the Draft MLK Subarea Plan.

Your proposal is hereby incorporated into this Planned Action EIS.

16. Your proposal to ensure Action 44 Green Streets, 45 Street car/LINK, and 46 Pierce Transit on pages 50 and 52 of the Draft MLK Subarea Plan provides good connectivity for bikes and fits with the Mobility Master Plan is acknowledged.

See the response to your comment #1.

17. Your proposal to add performance measure “identify sustainable funding options” to Action 46 Pierce Transit on page 48 of the Draft MLK Subarea Plan is acknowledged.

Your proposal is hereby incorporated into this Planned Action EIS.

18. Your proposal to add “and contribute to the health of patients, employees, and residents” to Action 51 on page 58 of the Draft MLK Subarea Plan is acknowledged.

Action 51 “Hospital Planning and Coordination - Work with MultiCare and Franciscan Health Systems and any other significant, campus-like institutions to evaluate more collaborative processes with the city and community, such as development agreements, to better define and support the long-range needs of these institutions, mitigate future development impacts as appropriate, ~~and~~ address how such future development can allow institutions to participate in the revitalization of the MLK district, and contribute to the health of patients, employees, and residents.”

Your proposal is hereby incorporated into this Planned Action EIS, and was updated in the final Hilltop Subarea Plan.

19. Your proposal to remove “significant” from Action 57 NGO Participation on page 56 of the MLK Subarea Plan is acknowledged.

Your proposal is hereby incorporated into this Planned Action EIS, and was updated in the final Hilltop Subarea Plan.

20. Your proposal to add “priorities” after implementation to Action 58 Communication on page 57 of the MLK Subarea Plan is acknowledged.

“Action 58: Communication - Establish effective public information and feedback materials and conduct frequent town halls, public open houses, and other events at locations in the MLK subarea to encourage public access and facilitate dialogue on MLK Subarea Plan implementation priorities, policies, programs, projects, and budgets.”

Your proposal is hereby incorporated into this Planned Action EIS, and was updated in the final Hilltop Subarea Plan.

21. Your proposal to add “and how they are addressing community needs” and performance measure “# of identified community needs being met” to Action #60 Assess Performance Results on page 57 of the MLK Subarea Plan is acknowledged.

“Action 60: Assess Performance Results - Conduct regular State of MLK program, project, and budget assessments including public, customer, and business surveys to determine the effectiveness, performance, ~~and~~ priority of subarea plan actions, and how they are addressing community needs.”

Your proposal is hereby incorporated into this Planned Action EIS.

22. Your proposal to note “that changes to existing facilities within the plan will still need to meet all applicable regulations” on page 58 (note 63) of the MLK Subarea Plan.

Your proposal is hereby incorporated into this Planned Action EIS.

Comments on MLK Subarea Plan and EIS

I have reviewed the MLK Subarea Plan and EIS and have several comments.

1. In the charts for MLK Proposed Actions, many organizations are listed as “participating parties”. Have each of those organizations agreed to the roles described for them? I do not believe they have in all cases and wonder when that would be done.
 - a. ForeverGreen Council is listed in several categories that are not appropriate and not listed in others that would be consistent with the Council work. The ForeverGreen Council works to facilitate creation of a county-wide network of trails. Parks and open space are essential to trails; complete streets provide connections within cities. ForeverGreen can support work related to those areas as it enhances the trail system.
 - i. Goal: Expand MLK parks and recreation opportunities
 1. 28: Greenways – appropriate
 2. 29: Community gardens – not related to our work
 - ii. Goal: Complete MLK parks and recreation projects
 1. 30: Peoples Community Center Plaza – this is kind of a stretch for Council work
 - iii. Goal: Promote MLK sustainability opportunities and performance
 1. 32: Native habitat – Council does not have expertise in this area
 2. 33: Stormwater – again, we do not have expertise in this area
 - iv. Goal: Expand pedestrian networks within MLK and with the rest of the city
 1. 35: Walkways and sidewalks – not listed but consistent with our mission and goals
 2. 36: Crosswalks – not listed but consistent with our mission and goals
 3. 37: Trails – not listed but consistent with our mission and goals. Why would ForeverGreen be involved with stormwater and not with trails?
 - v. Goal: Implement a bicycle network within MLK and between MLK and the city
 1. 38: Bikeway network – again we are not listed but very active in creating connected bikeways
 - vi. Goal: Implement Tacoma’s Complete Streets typologies in MLK
 1. 40: MLK retail/pedestrian/transit – ForeverGreen supports implementation of Complete Streets
 2. 41: Connectors - not listed but consistent with our mission and goals
 3. 42: Parkway - not listed but consistent with our mission and goals
 4. 43: Urban residential streets - not listed but consistent with our mission and goals

5. 44: Green streets – appropriately listed
- b. Coalition for Active Transportation (CAT) is also listed in some categories but not in others that would be appropriate.
 - i. Goal: Expand pedestrian networks within MLK and with the rest of the city
 1. 35: Walkways and sidewalks – not listed but consistent with our mission and goals
 2. 36: Crosswalks – not listed but consistent with our mission and goals
 3. 37: Trails – not listed but consistent with our mission and goals.
 - ii. Goal: Implement a bicycle network within MLK and between MLK and the city
 1. 38: Bikeway network – CAT is very active in creating connected bikeways
 - iii. Goal: Implement Tacoma’s Complete Streets typologies in MLK
 1. 40: MLK retail/pedestrian/transit – CAT supports implementation of Complete Streets
 2. 41: Connectors - not listed but consistent with our mission and goals
 3. 42: Parkway - not listed but consistent with our mission and goals
 4. 43: Urban residential streets - not listed but consistent with our mission and goals
 5. 44: Green streets - 41: Connectors - not listed but consistent with our mission and goals
 6. 42: Parkway - not listed but consistent with our mission and goals
 7. 43: Urban residential streets - not listed but consistent with our mission and goals
 - iv. Goal: Expand transit/street car service in MLK
 1. 45: Streetcar (LINK) – CAT supports transit as a form of active transportation
 2. 46: Pierce Transit - CAT supports transit as a form of active transportation
 - v. dfasdf
 - vi.
2. Map on page 36: I think that the Prairie Line Trail is mislabeled on this map. The title appears to be closer to the Water Ditch Trail than the Prairie Line.
3. Peoples Community Center Pool and Urban Recreation Facilities on pages 38, 40, and 41: Please remember that swimming pools are important for swimming as well as for leisure activities. While a leisure pool, water slide, spray ground, and other features are exciting, it is important to have a pool in the neighborhood where children (and adults) can learn to swim. Everyone should know how to swim, especially in an area with as much natural water as we have. Additionally, having a facility that allows lap swimming for

exercise will help increase the number of users and offset operating costs. Organized adult swimming and aquatic exercise programs can be good sources of revenue. As the average age of the population becomes older, more people need exercise that is easy on the joints. There are limited aquatic facilities not requiring membership available in Tacoma, particularly in the MLK area for adult lap swimming and aquatic exercise.

4. At its recent annual planning retreat, the New Tacoma Neighborhood Council agreed to work to support the implementation of the catalytic development projects in both the MLK and the South Downtown Subarea Plans.

Thank you for the opportunity to review the draft plan and EIS and thank you for your consideration of these comments.

Jane A. Moore, MD
Executive Director, ForeverGreen Council
Chair, Coalition for Active Transportation
Secretary, New Tacoma Neighborhood Council
Chair, US Masters Swimming Sports Medicine and Science Committee

4.11 Response to Jane A Moore, MD,
Executive Director, ForeverGreen
Council, Chair, Coalition for Active
Transportation, Secretary, New Tacoma
Neighborhood Council

1. Your comment concerning participating parties and their interest in assuming the roles assigned in the Draft MLK Subarea Plan is acknowledged.

The specific actions and participating parties listed in the Draft MLK Subarea Plan were identified during the stakeholder focus group workshops conducted at the beginning of the process that included the parties listed as lead agents and participants.

The proposed actions, participating parties, and performance measures were vetted with the MLK public during the open house and internet survey conducted between January and April 2012, then again at the open house and survey at Evergreen State College Tacoma during May 2012, and again during the open house at Evergreen State College in Tacoma in November 2012.

The lead agents were identified by the stakeholder focus groups sessions, reviews by the MLK Subarea Plan Working Group, and the consultant's opinions based on presumed key interest in and/or impact on specific actions and groups.

Once the MLK Subarea Plan and Planned Action EIS are adopted, the MLK Subarea Plan Working Group will need to verify with each participant whether they are interested and committed in participating as a lead or participating party, and if not who should in their place. Where listed parties are not interested, other parties may be assigned or assume lead or participant roles, or new organizations may be formed to take responsibility accordingly.

2. Your comment concerning ForeverGreen Council's appropriate role or not in specific action tasks is acknowledged.

Per your comments, ForeverGreen should be removed from:

Action 29: Community Gardens
Action 30: Peoples Community Center Plaza
Action 32: Native Habitat
Action 33: Stormwater

ForeverGreen should be added to:
Action 35: Walkways and sidewalks

Action 36: Crosswalks
Action 37: Trails
Action 39: Bikeway network
Action 40: MLK retail/pedestrian/transit
Action 41: Connectors
Action 42: Parkway
Action 43: urban residential streets

The Coalition for Active Transportation (CAT) should be added to:

Action 35: Walkways and sidewalks
Action 36: Crosswalks
Action 37: Trails
Action 38: Bikeway network
Action 40: MLK retail/pedestrian/transit
Action 41: Connectors
Action 42: Parkway
Action 43: Urban residential streets
Action 44: Green streets
Action 45: Streetcar (LINK)
Action 46: Pierce Transit

Your above proposals are hereby incorporated into this Planned Action EIS.

3. Your comment concerning the map on page 36 of the Draft MLK Subarea Plan is acknowledged.

The location and notation of the Prairie Line Trail is taken from the Mobility Master Plan and is presumed to be correct for the corridor between Center Street and South Tacoma Way leading into and through the University of Washington Tacoma campus to connect with the Shuster Parkway on Thea Foss Waterway.

The Water Ditch Trail is located between I-705 and East C and D Streets as it travels through the gorge from Pipeline Road East to connect to South Downtown and Thea Foss Waterway Esplanade.

4. Your comment concerning the value of swimming pools for instructional swimming and recreation and Peoples Community Center Pool in Actions 30 and 31 on pages 35 and 41 of the Draft MLK Subarea Plan in particular in this regard is acknowledged.

As noted in the insert of page 38 of the Draft MLK Subarea Plan, these issues and revenue potentials were analyzed and discussed in greater detail in the Peoples Community Center Master Plan developed by Metro Parks Tacoma and the City of Tacoma.

5. Your comment concerning the New Tacoma Neighborhood Council agreeing to work to support implementation of the catalytic

development projects in both MLK and the South Downtown Subarea Plans is acknowledged.

Your agreement to participate in implementation is hereby incorporated into this Planned Action EIS.

From: Kevin Grossman [mailto:kevin@kevingrossman.com]
Sent: Friday, February 01, 2013 4:58 PM
To: Planning
Subject: MLK Subarea Plan Comments - General Vision summary

Hi Brian,

Some thoughts... in order of items as presented in December 18 2012 Executive Summary

Plan Vision elements

Branding – Is it part of this planning exercise to provide suggestions or distillations of the input to guide potential branding work going forward? If so, how does the Business Association access this and assist in implementation and outreach?

Sustainability – an overused word that has very broadly used meanings – what specific aspects around sustainability are indicated out of this process? Solar in the vacant lots? A compostable materials only zone? LEED Gold energy efficiency for all new buildings? I like general inclusion of the term in the work, but without some additional framework it's not actionable.

Respectful – I concur with the notion of preserving MLK history – what actions can the City take to achieve this? What is the definition of MLK History?

Human scale –

I concur – 85 feet, however, is not human scale unless there are considerations around upper building setbacks, street scape uses and pedestrian friendly design guideline principals. No more parking garages fronting on main walkable arterials! What design elements can be incorporated in code to encourage or ensure Human Scale?

Public space –

Important concept – how does this work in the plan?

Quality Architecture – I don't know how you codify this, but it is important – and especially historic building (at least façade) preservation. How is this incentivized or supported by the City?

Multimodal

Agreed – this requires some explanation and illustrations – and money in street renovations going forward to really implement. Does the City have a long range capital plan that incorporates improvements to MLK that would be an additional incentive to private capital redevelopment of MLK?

Best regards,

Kevin



GROSSMAN SERVICES inc

Kevin Grossman, President

Grossman Services, Inc.

Direct: 206.730.5567

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"Opportunity is missed by most people because it is dressed in overalls and looks like work."

--- Thomas A. Edison



Please consider the environmental impact of needlessly printing this e-mail.

4.12 Response to Kevin Grossman, President, Grossman Services, Inc

1. Your comment concerning Branding in the Plan Vision Elements in the Executive Summary on page 1 of the Draft MLK Subarea Plan is acknowledged.

The MLK Subarea Plan Vision defined by the MLK Subarea Plan Working Group is defined on page 1 of the MLK Subarea Plan document. As stated, the vision is to “Restore the MLK Village as a place where people live, work, and play. Specifically, plan to realize...” 15 key elements which are defined as specific actions later in the MLK Subarea Plan document.

Action 21 on page 27 of the MLK Subarea Plan proposes to “Redefine the MLK (or Hilltop) brand to include arts and historical based themes and install artworks, gateways, wayfinding signage, walking tours, maps, and streetscape at the entrances into and of significant landmarks in MLK.”

Action 21 lists Hilltop Business District Assn and Hilltop Artists in Residence as lead agents and Tacoma Arts Administrator, Tacoma Historic Preservation Office, Historic Tacoma, Tacoma Historical Society, Allen Renaissance Center, DASH Center for the Arts, and the Tacoma Public Works Department as participants.

2. Your comment concerning Sustainability and its application in the Draft MLK Subarea Plan is acknowledged.

The term sustainability is used holistically in the Draft MLK Subarea Plan.

Action 3 Economic Sustainability on page 19 of the MLK Subarea Plan will “Recruit businesses that employ technical, professional, and managerial skills offered by area residents to facilitate live/work sustainability in MLK.”

Action 3 lists the Tacoma Community/Economic Development, Tacoma Private Capital Division, and Hilltop Business District Assn as lead agents and the Economic Development Board for Tacoma-Pierce County, Tacoma-Pierce County Association of Realtors, and Private property owners as participants.

Action 32 Native Habitat on page 41 of the Draft MLK Subarea Plan will “Plant street trees, reforest open spaces, remove invasive species, and replant habitat to promote use of native and drought resistant plants to restore wildlife

habitat in and around MLK’s public facilities and within MLK’s green, urban, and parkway street corridors.”

Action 32 lists Tacoma Open Space Program, Forever Green Council, and Metro Parks Tacoma as lead agents and Sustainability Commission, Tacoma-Pierce County Health Department, and Tahoma Audubon Society as participants.

Action 33 Stormwater on page 41 of the Draft MLK Subarea Plan will “Develop rain gardens, green roofs and walls, bio-filtration swales, and other green development features in and around MLK’s public facilities and within MLK’s green and urban streets as well as in new project developments.”

Action 33 lists Tacoma Public Works Department, Tacoma Open Space Program, and Metro Parks Tacoma as lead agents and Forever Green Council, Sustainability Commission, and the Tacoma-Pierce County Health Department as participants.

Action 34 Brownfields on page 41 of the MLK Subarea Plan will “Identify all known sites of hazardous materials including former gas stations and laundries, develop appropriate mitigation strategies, and create a funding source for mitigating the sites for redevelopment uses and projects.”

Action 34 lists Tacoma-Pierce County Health Department as lead agent and Tacoma Community/Economic Development, Tacoma Public Works Department, and the Environmental Protection Agency (EPA) as participants.

The Catalyst Project chapter of the final Hilltop Subarea Plan has been updated with an additional map and information on Brownfield remediation.

3. Your comment concerning preserving MLK history is acknowledged.

Action 24 Art and history walking tours on page 31 of the Draft MLK Subarea Plan will “Sign and create audio and phone apps for walking tours of MLK historical sites, buildings, and other visually interesting and significant landmarks for local recognitions as well as for historical tourist attractions.”

Action 24 lists Hilltop Business District Assn as the lead agent and Tacoma Community/Economic Development, Hilltop

Artists in Residence, Tacoma Arts Administrator, Tacoma Historic Preservation Office, Tacoma Arts Commission, Tacoma Landmarks Preservation Commission, Historic Tacoma, Tacoma Historical Society, Allen Renaissance Center, and DASH Center for the Arts as participants.

Action 25 Preservation of key historic resources on page 31 of the Draft MLK Subarea Plan will “Complete the ongoing city-wide historic resources inventory and then conduct a focused evaluation of and community discussion about historic buildings within the MLK district to identify the most critical buildings to be retained and explore incentives, such as historical transfer of development rights (TDR), and regulatory tools to support their preservation and continued use.”

Action 25 lists Hilltop Business District Assn and Tacoma Community/Economic Development as lead agents and Hilltop Artists in Residence, Tacoma Arts Administrator, Tacoma Historic Preservation Office, Tacoma Arts Commission, Tacoma Landmarks Preservation Commission, Historic Tacoma, Tacoma Historical Society, Allen Renaissance Center, and the DASH Center for the Arts as participants.

4. Your comment concerning human scale is acknowledged.

Action 48 Groundfloor retail requirements on page 56 of the Draft MLK Subarea Plan will “Designate Pedestrian Street mixed use ground floor retail requirements to reflect market capacity and desired concentrated retail corridor locations on MLK and South 11th Street in the MLK business district.”

Action 48 lists the Tacoma Community/Economic Development, Tacoma Planning Commission, and Hilltop Business District Assn as lead agents.

Action 49 Design standards on page 56 of the Draft MLK Subarea Plan will “Develop and adopt hybrid “form-based code” applications that illustrate building and street-level design objectives using examples to indicate public quality objectives within a flexible procedure that recognizes innovation.”

Action 50 lists the Tacoma Community/Economic Development and Tacoma Planning Commission as lead agents and Hilltop Business District Assn, Central

Neighborhood Council, and New Tacoma Neighborhood Council as participants.

See also 4.14 Aesthetics on page 290-296 of the Draft Planned Action EIS describing Tacoma’s existing Development Regulations concerning X (Mixed Use) District Design Standards for mass reduction, roofline, windows and openings: façade transparency and solar access, façade surface, and pedestrian design particulars to create human scale of potential mixed use structures and developments.

5. Your comment concerning Public space is acknowledged.

Action 26 Artist live/work space on page 31 of the Draft MLK Subarea Plan will “Develop affordable artist livework-teach-display-sell galleries and workshops as well as life-work housing opportunities to retain and attract young and emerging talent in MLK.”

Action 26 lists the Tacoma Housing Authority as the lead agent and the Tacoma Community/Economic Department, Hilltop Business District Assn, Tacoma Arts Administrator, Hilltop Artists in Residence, Allen Renaissance Center, and DASH Center for the Arts as participants.

Action 27 Farmers/Public Market on page 35 of the Draft MLK Subarea Plan will “Establish a seasonal and possibly year-round activity with all-weather structures, available parking, and increased visibility to serve residents and attract out-of-area customers into MLK for this purpose.”

Action 27 lists the Hilltop Business District Assn and Tacoma Farmers’ Market as lead agents and the Tacoma Community/Economic Development, Metro Parks Tacoma, and Tacoma Arts Administrator as participants.

See also the response to your comment 3.

6. Your comment concerning quality architecture including historic preservation is acknowledged.

See the response to your comment 3, 4, and 5.

7. Your comment concerning multimodal transportation development is acknowledged.

Actions 35-46 on pages 44-53 of the Draft MLK Subarea Plan will realize improvements to walkways and sidewalks, crosswalks, trails, bikeway network, street maintenance,

retail/pedestrian/transit corridors, connectors, parkways, urban residential streets, green streets, streetcar (LINK), LINK, and Pierce Transit respectively.

See also 4.9.3 Transportation Mitigations, Multimodal Systems in the Draft Planned Action EIS for a description of Tacoma's current multimodal goals and policies.

The Mobility chapter of the final Hilltop Subarea Plan has been updated with refinements to the complete streets type designations, and additional information on the LINK expansion.



February 5, 2013

Brian Boudet
City of Tacoma
747 Market St.
Tacoma, WA 98402-3769

RE: MLK SUBAREA DRAFT EIS AND SUBAREA PLAN

Dear Brian:

Thank you for the opportunity to review the MLK Draft EIS and Subarea Plan. Pierce Transit is supportive of the City's vision to encourage higher density mixed-use development which will encourage people to live and work in the same neighborhood. There are references to improving sidewalks, crosswalks, curb ramps and other non-motorized infrastructure improvements throughout both documents. These improvements are vital to encourage the use of public transportation, walking and bicycling. We have some general and specific comments on the Subarea Plan, which are duplicated for the Draft EIS.

Careful planning and consideration needs to be given to how streetcar and bus will complement each other in the future. We envision that once streetcar service begins, Pierce Transit will provide more of a feeder service to the streetcar, not duplicate it. Redevelopment and roadway reconfiguration may need to be designed in such a way to accommodate bus service in the short to mid-term while also providing for streetcar in the mid to long-term.

General Comment: Throughout the document Pierce Transit is referred to as "Pierce Transit Authority" or "PTA". Please update those references to either refer to: Pierce Transit, PT, or Pierce County Transportation Benefit Authority (PTBA)

General Comment: Throughout the document there are references to a "shuttle loop" service that was eliminated. This service was the Route 26 service. It will be helpful to clarify those comments and refer to the Route 26 service, that service was hourly and was a regular scheduled fixed route service that was eliminated due to low productivity and ridership. The term shuttle is confusing because Pierce Transit's specialized transportation service for people with disabilities is called SHUTTLE.

p. 47/Goal 39 Street maintenance: Please remove Pierce Transit as a "Participating Party". Pierce Transit does not fund street maintenance.

p. 47/Goal 40: Again, Pierce Transit can participate as a project partner but is unable to fund sidewalk and street projects.

p. 52 Complete Streets: We recommend clearly distinguishing between bus Transit Priority and streetcar Transit Priority. A center median for example may work well for streetcar, but not for a bus. Additional illustrations and definitions would be helpful. Also, we encourage you to add language to the plans that address Bus Rapid Transit (BRT) which can be an economical introduction for high capacity transit corridors that could later be converted to streetcar or light rail. There are often federal funds available for

corridors which meet requirements for BRT implementation, however, those funds do not provide operating revenue for the service.

p. 53/Goal 46 To "Retain and expand Pierce Transit's schedules and stops..." is an admirable goal. Ultimately Pierce Transit seeks to restore stronger public transit service to the community. Pierce Transit's funding situation is fairly well explained in section A7 "Pierce Transit has major funding problems..." and in more detail on page A9.

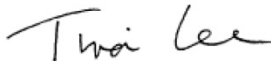
p. A9 Government: The three bullet items on this page that describe Pierce Transit should be updated. I've attached a strike-out version of the language for reference and also inserted the modified paragraphs below for your consideration:

- Nearly 70% of Pierce Transit's (PT) operating budget is derived from local sales tax. With the economic recession, that funding has significantly been reduced. Due to the financial impacts of the recession, transit service has been cut by over 43% over the past 4 years. In 2012 an independent Public Transportation Improvement Conference (PTIC) modified PT's boundaries shrinking the service area. The November 2012 Proposition 1 ballot to restore funding was unsuccessful and additional service cuts are now required by 2014 for PT to be financially sustainable. In the last round of service reductions the core routes in the downtown area were maintained but service frequency and span were significantly reduced. Additionally Route 26 which operated between MLK and the downtown was eliminated due to low productivity. Direct service between MLK and the downtown is still provided by a combination of other routes that converge on the downtown through MLK – though Route 26 is gone.
- 56% of those riding PT have a household income of less than \$20,000 per year, 76% have a household income under \$40,000 a year indicating how dependent low income employees and households are on public transit services.

p. A6 describes the intent of the Design Integration Review Team. Pierce Transit has been invited to several DIRT meetings over the last two years and has found them to be very valuable. We appreciate staff's efforts to facilitate early project coordination.

Again, we applaud the City's efforts and goals for the MLK Subarea and look forward to continued collaboration and coordination in the future. If you have any questions please contact Monica Adams at (253) 581-8130 or madams@piercetransit.org.

Sincerely,



Tina Lee, Capital Planning Manager

cc: Lynne Griffith
Kelly Hayden
Lars Erickson
Justin Leighton
Peter Stackpole
Monica Adams

#12-001 MLK Draft EIS.doc

3701 96th St SW PO Box 99070 Lakewood, WA 98499-0070 253.581.8080 FAX 253.581.8075 www.piercetransit.org

Suggested Language for MLK Subarea Plan, Appendix A, pg A-9:

Nearly 70% of Pierce Transit's Authority's (PTA) operating budget is derived from local sales tax. With the economic recess, that funding has significantly been reduced. Due to the financial impacts of the recession, transit service has been cut by over 43% over the past 4 years with more to come due to the recession. PTA-In 2012 an independent Public Transportation Improvement Conference (PTIC) modified PT's boundariesis shrinking boundaries shrinking the of service area. The November 2012 Proposition 1 ballot to restore funding was unsuccessful and additional service cuts are now required by 2014 for PT to be financially sustainable. and if ballot measures fail, future cuts will be in drivers and thus service. In the last round of service reductions tThe core routes in the downtown area were maintainedprotected but service frequency and span were significantly reduced. Additionally Route 26 which -operated during the last round of cuts though the shuttle route-between MLK and the downtown was eliminated due to low productivitydropped. Direct service between MLK and the downtown is still provided by a combination of other routes that converge on the downtown through MLK – though the loop-shuttle-Route 26 is gone.

Pierce Transit could alter service boundaries to reflect the outcome of recent ballot measures. Generally, transit services win within Tacoma and lose in the outlying rural areas. About 2/10 to 3/10s of a cent extra is required to keep PTA service constant within current PTA boundaries. The ballot issue will be decided in the November 2012 election.

56% of those riding PT all PTA riders make- have a household income of less than \$20,000 per year, 76% have a household income make under \$40,000 a year indicating how dependent low income employees and households are on public transit services.

4.13 Response to Tina Lee, Capital Planning Manager, Pierce Transit, PT

1. Your comment concerning the proper name of Pierce Transit Authority being Pierce Transit, PT or Pierce County Transportation Benefit Authority (PTBA) in the Draft MLK Subarea Plan and Planned Action EIS is acknowledged.

The proper name of Pierce Transit, PT or Pierce County Transportation Benefit Authority (PTBA) for "Pierce Transit Authority" is hereby incorporated into this Planned Action EIS and the final Hilltop Subarea Plan.

2. Your comment concerning the elimination of the "shuttle loop" service and thereby Route 26 which was the collecting route due to low productivity and readership is acknowledged along with the potential confusion "shuttle loop" has to Pierce Transit's SHUTTLE service for persons with disabilities.

Your correction is hereby incorporated into this Planned Action EIS.

3. Your request to remove Pierce Transit as a participating party from Action 39 Street Maintenance because Pierce Transit does not fund street maintenance on page 47 of the Draft MLK Subarea Plan is acknowledged.

Your correction is hereby incorporated into this Planned Action EIS.

4. Your comment that Pierce Transit can participate in Action 40 Retail/pedestrian/transit corridors on page 47 but does not fund sidewalk and street projects of the Draft MLK Subarea Plan is acknowledged.

5. Your proposal that bus Transit Priority should be distinguished from streetcar Transit Priority typologies and address Bus Rapid Transit (BRT) in Complete Streets on page 46 and 47 of the Draft MLK Subarea Plan is acknowledged.

The streetcar alignment Single Track with Bypass shown on page 55 of the Draft MLK Subarea Plan locates the streetcar along the west curb on MLK Way. The alignment is one of three options that were developed by the Tacoma Public Works Department that are illustrated and explained in greater detail on page 186-189 of the Draft Planned Action EIS. The other two alternatives - the Loop System and Double Track

- Pinched Loop System also locate the streetcar track along the curb.

The streetcar study, however, was a preliminary analysis and will be superseded by more detailed design evaluation and development if and when the streetcar or LINK expansion project occurs. Such analysis would likely involve Pierce Transit in the design phases.

The Transit Priority typologies shown and described in the Draft MLK Subarea Plan were taken from Tacoma's Complete Streets design manual. As shown on page 52 of the Draft MLK Subarea Plan, the typologies include a center median and curb side alternative which can accommodate median streetcar or LINK or curb side streetcar, LINK, or Bus Rapid Transit or local bus service as interim or permanent service.

Your proposal to further define the Complete Streets typologies to distinguish bus versus streetcar or LINK Transit Priority is hereby incorporated into this Planned Action EIS.

6. Your comment concerning Pierce Transit's funding situation in the Draft MLK Subarea Plan and on pages A-7 and A-9 of Appendix A: Focus Group Results to the MLK Subarea Plan is acknowledged.

Action 46 Pierce Transit on page 53 of the MLK Subarea Plan proposes to "Retain and expand Pierce Transit's schedules and stops to include hours and routes that support MLK employees and residents, particularly at MultiCare and Franciscan Health Systems Hospitals, Community Health Care, MLK business district, and to UW Tacoma and the downtown."

Pierce Transit's funding situation is also explained on pages 171-172 of the Draft Planned Action EIS including the following implications of the rejection of Proposition 1:

"If Pierce Transit winds up squeezing its runs that radically, its usefulness as a regional transit agency will be radically diminished. Many people depend on need bus and shuttles to get to work, school, stores and medical appointments. The need doesn't always conform to weekday hours.

Low-income workers, in particular, rely on buses in the evening and on weekends; many juggle multiple part-time jobs and have no other way to get around. For the elderly and many with physical impairments, shuttle service is an essential lifeline to the outside world.

If the economy bounces back strongly, providing more revenue for Pierce Transit's existing 0.6% sales tax, the agency could be able to avert doomsday. The estimated cutbacks were based on a very slow economic recovery; so far, the recovery has been outpacing the assumptions.

Without an expanded sales tax, some cutbacks are probably inevitable. Pierce Transit's management and board again face hard choices in the coming months. Everything must be on the table, including further service area contraction and another attempt at a sales tax increase."

The Mobility chapter of the final Hilltop Subarea Plan includes an update of the status of Pierce Transit funding for which, as of Summer 2013, the projection is that current levels of service can be maintained through June 2014.

7. Your comment concerning replacing the following three bullet points on page A-9 of Appendix A: Focus Group Results of the Draft MLK Subarea Plan with your proposed updated description is acknowledged.

- ~~•—Pierce Transit Authority's (PTA) budget has been cut 43% over the past 4 years with more to come due to the recession. PTA is shrinking boundaries of service and if ballot measures fail, future cuts will be in drivers and thus service. The core routes in the downtown area were protected during the last round of cuts though the shuttle route between MLK and the downtown was dropped. Direct service between MLK and the downtown is still provided by a combination of other routes that converge on the downtown through MLK—though the loop shuttle is gone.~~
- ~~•—Pierce Transit could alter service boundaries to reflect the outcome of recent ballot measures. Generally, transit services win within Tacoma and lose in the outlying rural areas. About 2/10 to 3/10s of a cent extra is required to keep PTA service constant within current PTA boundaries. The ballot issue will be decided in the November 2012 election.~~
- ~~•—50% of all PTA riders make less than \$20,000 per year, 75% make under \$40,000 a year indicating how dependent low income employees and households are on public transit services.~~

Your proposal to replace the above bullet points in Appendix A: Focus Group Results of the Draft

MLK Subarea Plan with your updated descriptions is hereby incorporated into this Planned Action EIS.

8. Your comment concerning Pierce Transit finding the Design Integration Review Team (DIRT) as described on page A-6: Focus Group Results of the MLK Subarea Plan and listed below to be valuable is acknowledged.

"Tacoma is attempting to implement a coordinated construction project approach to transportation and utility projects so that a single project accomplishes all upgrades in a corridor rather than separate multiple constructions. Design Integrated Review Team (DIRT) is the implementing entity - which they are considering expanding to include more than just city agencies"

Final Environmental Impact Statement (FEIS) Mailing List

Federal

Amtrak
Federal Emergency Management Agency (FEMA)
Joint Base Lewis-McChord
US Army Corps of Engineers
US Department of Agriculture, Soil Conservation Service
US Department of Housing and Urban Development
US Environmental Protection Agency
US Fish & Wildlife Service
US Geological Survey

Indian Tribes

Nisqually Tribal Council
Puyallup Tribal Council

Washington State

House Environmental Affairs Committee
Senate Parks & Ecology Committee
WA Department of Agriculture (DOA)
WA Department of Commerce (DOC)
WA Department of Ecology (DOE)
WA Department of Fish & Wildlife (WDFW)
WA Department of Natural Resources (DNR)
WA Department of Social & Health Services (DSHS)
WA Department of Trade & Commerce (DTC)
WA Department of Transportation
WA Department of Transportation (WSDOT)
WA Ecological Commission
WA Main Street
WA Office of Archaeology & Historic Preservation (OAHP)
WA Office of Financial Management (OFM)
WA Resource Conservation Office (RCO)
WA State Parks & Recreation Commission (P&RC)
WA Utilities & Transportation Commission (UTC)

Regional

Pierce Transit
Port of Tacoma
Puget Sound Clean Air Authority
Puget Sound Regional Council (PSRC)
Sound Transit
Tacoma-Pierce County Health District

Pierce County

Pierce County Commissioners (3)
Pierce County Executive
Assessor/Treasurer
Auditor
Budget & Finance
Economic Development
Emergency Management
Government Relations
Human Resources

Parks & Recreation
Planning & Land Services
Public Works & Utilities
Sheriff
Sustainability

City of Tacoma

Tacoma Mayor
Tacoma Mayor Pro Tem
Tacoma City Council (5)
Tacoma City Manager
Arts Administrator
Arts Commission
Attorney
Business Assistance Center
City Clerk
Community/Economic Development
Finance Director
Fire Chief
Historic Preservation Office
Housing Division
Landmarks Preservation Commission
Planning Commission (7)
Police Chief
Private Capital Division
Public Utilities District
Public Works Department
Traffic Engineering

Metro Parks Tacoma
Tacoma Housing Authority (THA)
Thea Foss Public Development Authority

Other Jurisdictions

City of Federal Way City Manager
City of Fife City Manager
City of Fircrest City Manager
City of Gig Harbor City Manager
City of Lakewood City Manager
City of Puyallup City Manager
City of University Place City Manager

Schools, College, & Universities

Bates Technical College
Evergreen State College Tacoma
Tacoma Community College
Tacoma Public Schools
University of Washington Tacoma (UWT)

Transportation

Burlington Northern Santa Fe Railroad (BNSF)
Union Pacific Railroad

Utilities

Cascade Natural Gas Corporation
Click!
Pierce County Public Utilities District (PUD)

Verizon Northwest

Libraries

Pierce County Library District
Tacoma Public Library

Newspapers

Business Examiner
Seattle Times
Tacoma Daily Index
Tacoma News Tribune
Tacoma Weekly
Weekly Volcano

MLK Subarea Plan Working Group

Allen Renaissance
Associated Ministries
Black Collective
Central Neighborhood Council
Centro Latino
Colored Women's Association
Community Health Care
Franciscan Health Systems
Hillside Development Council
Hilltop Action Coalition
Hilltop Business District Association
Historic Tacoma
MLK Housing Development Association
MultiCare Health Systems
New Tacoma Neighborhood Council
Shared Housing Services
Tacoma Ministerial Alliance
Tacoma Urban League
Tacoma-Pierce County Affordable Housing Consortium
Wedge Neighborhood Historic District

Citizen Groups/Organizations

1022
Al Davies YMCA
Bicycle & Pedestrian Action Committee
Catholic Community Services
Coalition for Active Transportation
Cross Cultural Collaborative
DASH Center for the Arts
Downtown on the Go
Economic Development Board for Tacoma-Pierce County
Fab-5
Forever Green Council
Fulcrum Gallery
Hilltop Artists in Residence
Homeownership Center of Tacoma
Johnson's Candy Company
Kidder Mathews
Korean Women's Association
LeLe's
Mr Mac
NW School of Innovative Learning
Peace Community Center

Safeway
South Puget Sound Boys & Girls Club
Spaceworks
Sustainability Commission
Tacoma Art Place
Tacoma Farmers' Market
Tacoma Historical Society
Tacoma Streetcar
Tacoma Wheelmen Bicycle Club
Tacoma-Pierce County Association of Realtors
Tacoma-Pierce County Habitat for Humanity
Tahoma Audubon Society
Tempest
Tim Johnson Commercial Properties
Tower Coffee
Transportation Choices Coalition
Youth for Christ, Hilltop Campus Life

Letters of Comment

Richard Petrich
Chris Karnes
Korbett Mosesly
Jori Adkins
Lois Bernstein, Senior Vice President Community Services, MultiCare Health Systems
Marv Coleman and Mike Drumright, Department of Ecology, SW Regional Office
Peter Roach, Just Technologies LLC
Cindy O'Neill
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Kevin Grossman, President, Grossman Services, Inc
Tina Lee, Capital Planning Manager, Pierce Transit