To: Planning Commission
From: Larry Harala, Planning Services Division
Subject: 2022 Amendment – Assessment of Applications
  • “NewCold”
  • “South Sound Christian Schools”
Meeting Date: May 5, 2021
Memo Date: April 30, 2021

Action Requested:
Comment and Direction.

Discussion:
At the next meeting on May 5, 2021, the Planning Commission will begin conducting assessment of applications for the 2022 Annual Amendment to the One Tacoma Comprehensive Plan and Land Use Regulatory Code (“2022 Amendment”).

By the deadline of March 31, 2021, the Commission received three applications from private (non-City government) entities. For identification purposes, the applications are referenced as “NewCold”, “South Sound Christian Schools”, and “South Tacoma Economic Green Zone.” A summary of the applications is attached.

In accordance with the requirements of the Tacoma Municipal Code (TMC), Section 13.02.070.E, the Commission will conduct assessment of the applications and determine whether the applications would be accepted and moved forward for technical analysis. The schedule for this initial review is as follows, subject to change:
  • May 5, 2021 – Assessment of “NewCold” and “South Sound Christian Schools”
  • May 19, 2021 – Assessment of “South Tacoma Economic Green Zone”
  • June 16, 2021 – Public Scoping Hearing
  • July 7, 2021 – Debriefing of Hearing
  • July 21, 2021 – Determination

Attached to facilitate the Commission’s review on May 5th are the Assessment Reports for “NewCold” and “South Sound Christian Schools.” Also attached are the respective applications submitted.

Project Summary:
The Comprehensive Plan and its elements, as well as development regulations and regulatory procedures that implement the Comprehensive Plan, shall be adopted and amended by ordinance of the City Council following the procedures identified in TMC 13.02.070. Proposed amendments may be considered annually, for which the amendment process shall begin in July of any given year and be completed, with appropriate actions taken by the City Council by the end of June of the following year. This timeline has been modified due to the COVID-19 crisis, in the following ways:
  • The 2020 Amendment process that should have been competed in June 2020 was not completed until December 2020;
• The 2021 Amendment process that should have begun in July 2020 has been pushed back and rolled into the 2022 Amendment process; and
• The 2022 Amendment process has started earlier than the July 2021 timeline; it started with accepting applications during January-March 2021.

For more information about 2022 Amendment, please visit www.cityoftacoma.org/2022Amendment.

Staff Contact:
• Larry Harala, lharala@cityoftacoma.org
• Lihuang Wung, lwung@cityoftacoma.org

Attachments:
1. 2022 Amendment – Summary of Applications
3. Application – “NewCold"
5. Application – “South Sound Christian Schools”

c. Peter Huffman, Director
# 2022 Annual Amendment – Summary of Private Applications
April 27, 2021

<table>
<thead>
<tr>
<th>Project ID</th>
<th>NewCold</th>
<th>South Sound Christian Schools</th>
<th>South Tacoma Economic Green Zone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed Amendment</td>
<td>Land Use Designation Change</td>
<td>Land Use Designation Change</td>
<td>Changes to Comprehensive Plan, Land Use Designations and Regulatory Code</td>
</tr>
<tr>
<td>Applicant</td>
<td>NewCold Seattle, LLC</td>
<td>South Sound Christian Schools and CenterPoint Christian Fellowship</td>
<td>South Tacoma Neighborhood Council</td>
</tr>
</tbody>
</table>
| Location and Size of Area | • 4601 S. Orchard Street  
• 3 acres | • Vicinity of 2052 S. 64th Street  
• 8 parcels  
• 16 acres | • South Tacoma Groundwater Protection District Overlay (STGPD)  
• 5000+ acres |
| Current Land Use and Zoning | • Designation: Light Industrial  
• Zoning: M-1-STGPD Light Industrial District with South Tacoma Groundwater Protection District Overlay | • Designation: Single Family Residential  
• Zoning: R-2-STGPD Single Family Dwelling with South Tacoma Groundwater Protection District Overlay | • South Tacoma Groundwater Protection District Overlay  
• Multiple/various land use designations and zoning districts  
(See Exhibit 3) |
| Proposal Summary | The request is to change the land use designation at the 3-acre subject site from “Light Industrial” to “Heavy Industrial.”  
The subject site is a portion of a larger 34-acre parcel already developed with a heavy industrial cold storage facility. The parcel, except the subject site, is currently designated Heavy Industrial and zoned M-2. The proposal, with a subsequent rezone, would keep the designation and zoning of the entire parcel consistent and allow for future expansion of the existing facility.  
(See Exhibit 1) | The request is to change the land use designation from Single Family Residential to Multi-Family Residential (Low Density) on the western 4 parcels and General Commercial on the eastern 4 parcels.  
The proposed designations would allow multi-family development on a certain portion of the western 4 parcels (with a subsequent rezone to R4-L) and commercial use on a certain portion of the eastern 4 parcels (with a subsequent rezone to C-2).  
(See Exhibit 2) | The request is to conduct a broad review of the South Tacoma Manufacturing/Industrial Center and STGPD/aquifer recharge areas, along with progressive changes to the Comprehensive Plan, Land Use Designations and Regulatory Code, to eliminate environmental and health risks and promote an Econ-Industrial Park and Economic Green Zone (“EIP-EGZ”) concept.  
Such a designated review would align the Comprehensive Plan, the Urban Tree Canopy, Tacoma Environmental Act, Climate Justice Action Plan and STGPD Code into a new unified EIP-EGZ that would be more consistent with Tacoma’s economic and environmental goals, leverage existing possibilities of undeveloped sites within the STGPD and aquifer recharge areas, avoid further environmental contamination and negative health impacts, and bring additional economic opportunities and revitalization. |
Exhibit 1

NewCold Property and Parcel of Interest
(4601 S. Orchard Street)
Exhibit 2

South Sound Christian Schools
(In the vicinity of 2052 S. 64th Street)
(Western Parcels: A, B, C & D; Eastern Parcels: E, F, G & H)

Figure 1: Project Parcels and Owner Identification

Figure 2: Existing and Proposed Site FLUM Designations
Exhibit 3

South Tacoma Groundwater Protection District
General Area and Land Use Designations
NewCold Facility Land Use Designation Change Request

Application Summary
April 29, 2021

This application is a request for a land use designation change on the City of Tacoma Future Land Use Map (Figure 2 of the One Tacoma Plan) at the subject site from a “Light Industrial” to “Heavy Industrial.”

<table>
<thead>
<tr>
<th>Project Summary</th>
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<tbody>
<tr>
<td><strong>Project Title</strong></td>
</tr>
<tr>
<td><strong>Applicant:</strong> NewCold Seattle, LLC – Matt Richardson, NewCold Business Manager</td>
</tr>
<tr>
<td><strong>Location and Size of Area:</strong> 4601 S Orchard St Tacoma, WA 98466 (APN: 0220133049)</td>
</tr>
<tr>
<td><strong>Current Land Use and Zoning:</strong> Site is Designated Light Industrial</td>
</tr>
<tr>
<td><strong>Neighborhood Council Area:</strong> South Tacoma</td>
</tr>
<tr>
<td><strong>Date of Report:</strong> 4/29/2021</td>
</tr>
<tr>
<td><strong>Proposal Summary:</strong> A request for a land use designation change at the subject site from the “Light Industrial” designation to “Heavy Industrial.”</td>
</tr>
</tbody>
</table>
Section A. Proposed Scope of Work

1. Area of Applicability

Site Location:

SITE LOCATION:
3-acre portion adjacent to existing NewCold heavy-industrial cold storage facility.

Address:
4601 S Orchard St
APN: 0220133049
2. Background

The NewCold heavy industrial cold storage facility was completed in 2018, the facility has a storage capacity of over 25 million cubic feet in a vertical cold storage layout, with an approximate 100,000 pallet capacity. The facility is utilized by large food companies such as Trident Seafoods as a cold storage link in their supply chains.

The existing site sits on approximately 34 acres, and the subject sit is an adjacent 3-acre site, directly to the east of the existing approximately 140-foot tall cold storage building.

This area has been zoned M-1 Light Industrial for many years and is within the South Tacoma Groundwater Protection District (TMC 13.09).

The parcel in question is located east of South Orchard Road, off South 46th Street. The site was graded previously for development and is flat and vacant, with no trees or other substantial vegetation. The parcel is in the northeast section of NewCold’s property located at 4601 South Orchard Street. The parcel is highlighted on the following page, along with the rest of NewCold’s property, in Figure 1.
3. Policy Framework

How does the proposed amendment seek to implement applicable provisions of State statutes, case law, regional policies, and the Comprehensive Plan?

The application itself is compliant with standards set forth in Tacoma Municipal Code 13.02.045, as well the proposal is supported by several policy elements from the City of Tacoma’s One Tacoma Comprehensive Plan. Overall the proposal seeks to bring the underlying designation more in line with what the future use of the overall site is intended to be, as well with adjacent existing Heavy Industrial site.

Existing designation:

**Light Industrial** - This designation allows for a variety of industrial uses that are moderate in scale and impact, with lower noise, odors and traffic generation than heavy industrial uses. This designation may include various types of light manufacturing and warehousing and newer, clean and high-tech industries, along with commercial and some limited residential uses. These areas are often utilized as a buffer or transition between heavy industrial areas and less intensive commercial and/or residential areas. Corresponding Zoning Categories – M-1 Light Industrial District

Proposed designation:

**Heavy Industrial** - This designation is characterized by higher levels of noise and odors, large-scale production, large buildings and sites, extended operating hours, and heavy truck traffic. This designation requires access to major transportation corridors, often including heavyhaul truck routes and rail facilities. Commercial and institutional uses are limited and residential uses are generally prohibited.

Urban Form:

- **Goal UF–1**: Guide development, growth, and infrastructure investment to support positive outcomes for all Tacomans.
- **Policy UF–1.1**: Ensure that the Comprehensive Plan Land Use Map establishes and maintains land use designations that can accommodate planned population and employment growth.
- **Policy UF–1.4**: Direct the majority of growth and change to centers, corridors, and transit station areas, allowing the continuation of the general scale and characteristics of Tacoma’s residential areas.
- **Policy UF–1.6**: Support energy-efficient, resource-efficient, and sustainable development and transportation patterns through land use and transportation planning.
- **Policy UF–1.11**: Evaluate the impacts of land use decisions on the physical characteristics of neighborhoods and current residents, particularly underserved and under-represented communities. Avoid or reduce negative development impacts, especially where those impacts inequitably burden communities of color underserved and under-represented communities, and other vulnerable populations. Make needed investments in areas that are deficient in infrastructure and services to reduce disparities and increase equity and where growth and change are anticipated.
Design + Development:

- **GOAL DD–4**: Enhance human and environmental health in neighborhood design and development. Seek to protect safety and livability, support local access to healthy food, limit negative impacts on water and air quality, reduce carbon emissions, encourage active and sustainable design, and integrate nature and the built environment.
  - NewCold constructs energy-efficient warehouses to minimize development and operational impacts on climate change. The building design allows NewCold to store more product vertically, therefore maximizing land use efficiency. When compared to traditional warehouses, the footprint and the total surface area used are much smaller for the same quantity of goods.
  - In existing NewCold facilities, all of the stacker cranes in the cold store run in the dark. In addition, NewCold’s storage facilities use solely LED lighting for energy and maintenance efficiency. The material handling systems to move the pallets only run when necessary to ensure minimal door openings for pallets entering and leaving the cold storage. Such an approach optimizes power consumption leading to responsible energy usage. Our case study showed that NewCold’s warehouses on average consume 40% less energy per cubic meter annually compared to traditional cold storage facilities.

- **GOAL DD–7**: Support sustainable and resource efficient development and redevelopment.
  - This parcel is owned by NewCold and is immediately adjacent to the existing NewCold Tacoma facility. If the parcel designation were to be consistent with the existing facility, it would maximize the efficiency of any future development and operations vs having to duplicate common elements at an alternate site/location.
  - While developing the existing facility, NewCold made design decisions with future expansion in mind in collaboration with the City of Tacoma. There are efficiencies to be gained via power, electrical, and cooling usage by expanding the current development, rather than developing a new location.
  - Allowing for the maximized use of the existing property would result in ridesharing potential, efficient operations, and resource maximization.

- **GOAL DD–9**: Support development patterns that result in compatible and graceful transitions between differing densities, intensities and activities.
- **Policy DD–9.2a**: Improve the interface between non-residential activities and residential areas, in areas where commercial or employment areas are adjacent to residential zoned land.
  - Due to the absence of residential activity immediately adjacent to the parcel, the impact of redesignation is limited.
  - One of the primary themes of these policies is to create smooth transitions between incompatible densities, intensities, and activities. Given that there are no residential or other sensitive uses adjacent to the parcel, the parcel is inappropriately located as a Light Industrial designation. The site adjoins the Tacoma landfill and there are no sensitive uses to buffer or to require a transition.
• **GOAL DD–10**: Ensure that all citizens have nearby, convenient, and equitable access to healthy foods.
  - NewCold’s design and scale provide great value to the food manufacturers we partner with
    - Food Supply Chain reliability
      - Increased resilience to unforeseen challenges
      - 2020 Examples include COVID-19, container shortage, labor shortage
  - Food Safety (“cold chain” never broken)
  - Hedge against future cost increases (60% less energy, 75% less labor), providing price stabilization to consumers

**Economic Development:**

• **GOAL EC–1**: Diversify and expand Tacoma’s economic base to create a robust economy that offers Tacomans a wide range of employment opportunities, goods and services.
  - The requested designation change would allow NewCold to expand the site in the most optimal way to provide long-term value to our customers and therefore Tacoma’s economy.
  - Provide more family-wage jobs in a “new” sector – automated cold logistics.
  - Further anchors food manufacturers to the Port of Tacoma

  - Information Technology – Automated logistics
  - Industrial and manufacturing – NewCold’s warehouse is an essential component of this industry and partners with “blue-chip” food manufacturers.
  - International Trade – The site’s strategic focus is to enhance and bring value to this industry. Allowing the site to expand in an optimal way supports this and helps stabilize port operations.

• **GOAL EC–2**: Increase access to employment opportunities in Tacoma and equip Tacomans with the education and skills needed to attain high quality, living wage jobs.
  - Phase 1 of the site brought approximately 100 jobs to Tacoma
  - Phase 2 (with the designation requested) would generate an estimated 100 new permanent jobs, temporary jobs during any development or construction activities, and seasonal jobs once operations commence.
  - Many of the roles NewCold employs require a unique skillset and robust training in the following practices:
    - IT, Logistics, Automation, Engineering, Maintenance, etc.
  - NewCold empowers its employees with the on-the-job training to be successful
    - Continually invests in training and mentorship of employees
  - Pierce County Average Annual Salary = $44,553
  - NewCold Tacoma Average Annual Salary = $64,280
4. Objectives

a) **Address inconsistencies or errors in the Comprehensive Plan or development regulations;**
   The proposed amendment will address the current inconsistency in NewCold’s property. The small area of Light Industrial adjacent to the landfill and to the balance of the Heavy Industrial designated land appears to be an oversight or error. It is not consistent with the purpose and other policies cited above. The proposal would correct that.

b) **Respond to changing circumstances, such as growth and development patterns, needs and desires of the community, and the City’s capacity to provide adequate services;**
   There is a growing need for support of port industries and demand for warehousing capacity in the area. The automation and technology within NewCold’s adjacent building requires the Heavy Industrial designation only because of the height of the equipment in the building. Given that this technology was not anticipated in the past, the current designation no longer fits the site and surrounding area or the requirements of the food storage industry.

c) **Maintain or enhance compatibility with existing or planned land uses and the surrounding development pattern; and**
   There are no nearby residences at the parcel with which the proposal would be incompatible. They are separated by distance and existing improvements. The parcel is essentially within the existing developed footprint.
   The existing NewCold site development consists of highly automated, heavily industrial equipment. The NewCold High Bay structure is approximately 140 feet tall, consisting of structural steel racking and automated cranes, which operate independently to store and retrieve goods. Additionally, there are thousands of feet of conveyor systems within the warehouse. These are some of the systems that require a Heavy Industrial site designation.
   Any future expansion of the facility would also need to be in a Heavy Industrial designated area and this would be consistent with and support the existing facility.
   The redesignation of this parcel to Heavy Industrial would encourage NewCold to utilize the area for future expansion in line with our core business. Consistent designation would allow for efficient sharing of existing site infrastructure and resources if an expansion were to occur.

d) **Enhance the quality of the neighborhood.**
   NewCold believes that this redesignation which would allow for further expansion of the site would enhance the quality of the neighborhood, or at the very least have no adverse neighborhood impacts for the reasons outlined above. Further project-specific impacts and neighborhood issues can be considered with a specific rezone proposal in the future, which would require public notice and comment. Any proposed future development owned by NewCold would be a facility consistent with the existing building or have another compatible use.

5. Options Analysis

The applicant is limited in terms of alternatives, they could simply utilize the site in a consistent manner with light industrial use such as surface parking or possibly limited.

6. Proposed Outreach

Outreach for this project should include surrounding potentially impacted neighborhoods and expanded notice will be warranted. The continuing complexities around public meetings continues due to Covid-19. Staff is hopeful that by the early fall physical public meetings will again be possible. A hybrid approach incorporating online meetings and
physical meetings will likely be necessary going forward.

In addition to the considerations for virtual meetings and expanded notice, standard City of Tacoma Planning and Development Services outreach would be conducted including mailings and a webpage. Press releases would be issued in advance of meetings. There is a possibility that there could be a need for multiple neighborhood meetings depending on interest and concerns expressed by area residents.

NewCold has participated in significant community outreach. Some examples of our engagement with the community are:

- NewCold Internship Program with Clover Park Technical College
- Local Charitable Donations/Sponsorships
  - Rainier Highlanders Junior Rugby Club
  - Employee coached AAU Basketball teams
  - Emergency Food Network
  - Community Youth Services

7. Impacts Assessment
A key impact of this proposal would be a potential increase to generated heavy trucking traffic to and from the site. Also, future building placement and size could be a visual impact to the area as well added heavy industrial could have noise and odor impact.

8. Supplemental Information
It is possible that a preliminary traffic study and greater detail on the anticipated expansion of the 3-acre site would entail, conceptual elevations and site plans would be useful for public meetings as key questions are likely to be centered on future development of the site, and anticipated traffic, light, noise, odor impacts of future development.

Section B. Assessment

The applications were reviewed against the following assessment criteria pursuant to TMC 13.02.070.E:

1. If the amendment request is legislative and properly subject to Planning Commission review, or quasi-judicial and not properly subject to Commission review.

   **Staff Assessment:** The amendment is legislative and properly subject to Planning Commission review.

2. If there have been recent studies of the same area or issue, which may be sufficient cause for the Commission to decline further review, or if there are active or planned projects that the amendment request can be incorporated into.

   **Staff Assessment:** Staff does not find recent proposals or studies, this application is not a repetitive request.

3. A preliminary staff review of the application submittal.

   **Staff Assessment:** Staff finds the application complete and ready for planning commission assessment.
4. Identification of the other amendment options the Planning Commission could consider in addition to the amendment as proposed by the applicant; and

**Staff Assessment:** Planning commission could consider recommending modification to the proposal, such as removal of one or more of the proposed parcels from this. Planning commission could consider other designation and zoning possibilities.

5. If the amount of analysis necessary is reasonably manageable given the workloads and resources of the Department and the Commission, or if a large-scale study is required, the amendment request may be scaled down, studied in phases, delayed until a future amendment cycle, or declined.

**Staff Assessment:** The proposal as submitted should be reasonable to manage by staff given the current workload and resources of the department and commission, this application will generate a considerable amount of work initially with public outreach. However, this is a relatively site specific request and the scope of work is not such that it will generate work beyond staff resources and capacity.

The following sections to be completed after public hearing:

**Section C. Summary of Public Comments**

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<tr>
<th>Issue</th>
<th>Staff Response</th>
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**Section D. Recommendation**

According to TMC 13.02.070, the Planning Commission will review this assessment and make its decision as to:

1. Whether or not the application is complete, and if not, what information is needed to make it complete;
2. Whether or not the scope of the application should be modified, and if so, what alternatives should be considered; and

**Next Steps**

- May 19th, the Planning Commission will be asked to set the public scoping hearing for all applications.
- June 16th – Public Scoping Hearing
- July 21st – Planning Commission final determination on acceptance of applications.

**Exhibits**

- Application
**Application**

Proposed Amendments to the Comprehensive Plan and/or Land Use Regulatory Code

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<tr>
<th>For Office Use Only</th>
<th>Application No.:</th>
<th>Date Received:</th>
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**Type of Amendment**

- [☐] Land Use Designation Change
- [☐] Interim Zoning or Moratorium
- [☐] Area-wide Rezone

**Summary of Proposed Amendment**

NewCold is applying for a land use designation amendment to update a parcel of the Tacoma site to allow for future expansion of an existing facility. The parcel in question is currently designated as “Light Industrial”, and NewCold is requesting that the parcel be redesignated to Heavy Industrial. The developed portion of NewCold’s 34-acre property is currently designated as Heavy Industrial, and the parcel we are requesting the change in designation for is approximately 3 acres. This redesignation is critical for the facility’s expansion as well as NewCold’s growth throughout the United States.

**Applicant**

<table>
<thead>
<tr>
<th>Name</th>
<th>NewCold</th>
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<tbody>
<tr>
<td>Affiliation / Title</td>
<td>NewCold Seattle, LLC</td>
</tr>
<tr>
<td>Address</td>
<td>4601 S Orchard St</td>
</tr>
<tr>
<td>City, State, Zip Code</td>
<td>Tacoma, WA 98466</td>
</tr>
<tr>
<td>E-mail</td>
<td></td>
</tr>
<tr>
<td>Phone</td>
<td>253-753-9810</td>
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**Co-Applicant, or Additional Contact (If applicable)**

<table>
<thead>
<tr>
<th>Name</th>
<th>Matt Richardson</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affiliation / Title</td>
<td>NewCold - Business Manager</td>
</tr>
<tr>
<td>Address</td>
<td>4601 S Orchard St</td>
</tr>
<tr>
<td>City, State, Zip Code</td>
<td>Tacoma, WA 98466</td>
</tr>
<tr>
<td>E-mail</td>
<td><a href="mailto:matt.richardson@newcold.com">matt.richardson@newcold.com</a></td>
</tr>
<tr>
<td>Phone</td>
<td>253-753-9818</td>
</tr>
<tr>
<td>Relationship to Applicant</td>
<td>Employee</td>
</tr>
</tbody>
</table>

I hereby state that I am the applicant listed above and the foregoing statements and answers made, and all the information and evidence submitted are, in all respects and to the best of my knowledge and belief, true and complete. I understand that submitting this application does not result in automatic acceptance of this application or guarantee its final approval.

**Signature:**

Date: 3/29/21

3/30/21
Required Questionnaire

The applicant is responsible for providing complete and accurate information in response to the following questions. You may type in the space under each question or provide your answers in text and/or graphic form on separate sheets of paper and reference the question numbers in your answer. List and label all applicable attachments that are included with the application. The Planning Commission and Department staff reserve the right to request additional information as needed. Any modification to the application must be submitted prior to the deadline. A pre-application meeting with staff before submitting an application is strongly advised.

1. Project Summary – Please provide the following information:
   (a) A description of the proposed amendment, including the amendatory language, if applicable

   NewCold is proposing a Land Use Designation Change from Light Industrial to Heavy Industrial for the 3-acre northeastern portion of parcel number 0220133049.

   (b) A description, along with maps if applicable, of the area of applicability and the surrounding areas, including identification of affected parcels, ownership, current land uses, site characteristics, and natural features

   The parcel in question is located east of South Orchard Road, off South 46th Street. The site was graded previously for development and is flat and vacant, with no trees or other substantial vegetation. The parcel is in the northeast section of NewCold’s property located at 4601 South Orchard Street. The parcel is highlighted on the following page, along with the rest of NewCold’s property, in Figure 1.
Figure 1: NewCold Property & Parcel of Interest
(c) The current and proposed Comprehensive Plan land use designation and zoning classification for the affected area

The current designation of the parcel is Light Industrial and the current zoning is M-1. This designation of the parcel is not consistent with the Heavy Industrial designation and M-2 zoning of the remainder of the developed property.

Under the One Tacoma Comprehensive plan, the Light Industrial “designation allows for a variety of industrial uses that are moderate in scale and impact, with lower noise, odors and traffic generation than heavy industrial uses. This designation may include various types of light manufacturing and warehousing and newer, clean and high-tech industries, along with commercial and some limited residential uses. These areas are often utilized as a buffer or transition between heavy industrial areas and less intensive commercial and/or residential areas.”

Additionally, the Heavy Industrial “designation is characterized by higher levels of noise and odors, large-scale production, large buildings and sites, extended operating hours, and heavy truck traffic. This designation requires access to major transportation corridors, often including heavy haul truck routes and rail facilities. Commercial and institutional uses are limited and residential uses are generally prohibited.”
2. Policy Review – Please identify and cite any applicable policies of the Comprehensive Plan and/or Land Use Regulatory Code that provide support for the proposed amendment.

Upon review of the Comprehensive Plan and the Land Use Regulatory Code, the proposed amendment would correct what appears to be an anomaly in the comprehensive plan designation, would result in the most efficient possible use of the land, and would make possible future development of the site which would benefit the neighborhood, community, and economy. NewCold believes this application is aligned with the goals and policies detailed in the Comprehensive Plan and Land Use Regulatory Code, as supported by the following examples:

Urban Form:

**Goal UF–1:** Guide development, growth, and infrastructure investment to support positive outcomes for all Tacomans.

**Policy UF–1.1:** Ensure that the Comprehensive Plan Land Use Map establishes and maintains land use designations that can accommodate planned population and employment growth. See Figure 2, Comprehensive Plan Future Land Use Map.

**Policy UF–1.4:** Direct the majority of growth and change to centers, corridors, and transit station areas, allowing the continuation of the general scale and characteristics of Tacoma’s residential areas.

**Policy UF–1.6:** Support energy-efficient, resource-efficient, and sustainable development and transportation patterns through land use and transportation planning.

**Policy UF–1.11:** Evaluate the impacts of land use decisions on the physical characteristics of neighborhoods and current residents, particularly underserved and under-represented communities. a. Avoid or reduce negative development impacts, especially where those impacts inequitably burden communities of color underserved and under-represented communities, and other vulnerable populations. b. Make needed investments in areas that are deficient in infrastructure and services to reduce disparities and increase equity and where growth and change are anticipated.

Design + Development:

**GOAL DD–4:** Enhance human and environmental health in neighborhood design and development. Seek to protect safety and livability, support local access to healthy food, limit negative impacts on water and air quality, reduce carbon emissions, encourage active and sustainable design, and integrate nature and the built environment.

- NewCold constructs energy-efficient warehouses to minimize development and operational impacts on climate change. The building design allows NewCold to store more product vertically, therefore maximizing land use efficiency. When compared to traditional
warehouses, the footprint and the total surface area used are much smaller for the same quantity of goods.

- In existing NewCold facilities, all of the stacker cranes in the cold store run in the dark. In addition, NewCold’s storage facilities use solely LED lighting for energy and maintenance efficiency. The material handling systems to move the pallets only run when necessary to ensure minimal door openings for pallets entering and leaving the cold storage. Such an approach optimizes power consumption leading to responsible energy usage. Our case study showed that NewCold’s warehouses on average consume 40% less energy per cubic meter annually compared to traditional cold storage facilities.

**GOAL DD–7: Support sustainable and resource efficient development and redevelopment.**

- This parcel is owned by NewCold and is immediately adjacent to the existing NewCold Tacoma facility. If the parcel designation were to be consistent with the existing facility, it would maximize the efficiency of any future development and operations vs having to duplicate common elements at an alternate site/location.
- While developing the existing facility, NewCold made design decisions with future expansion in mind in collaboration with the City of Tacoma. There are efficiencies to be gained via power, electrical, and cooling usage by expanding the current development, rather than developing a new location.
- Allowing for the maximized use of the existing property would result in ridesharing potential, efficient operations, and resource maximization.

**GOAL DD–9: Support development patterns that result in compatible and graceful transitions between differing densities, intensities and activities.**

**Policy DD–9.2a: Improve the interface between non-residential activities and residential areas, in areas where commercial or employment areas are adjacent to residential zoned land.**

- Due to the absence of residential activity immediately adjacent to the parcel, the impact of redesignation is limited.
- One of the primary themes of these policies is to create smooth transitions between incompatible densities, intensities, and activities. Given that there are no residential or other sensitive uses adjacent to the parcel, the parcel is inappropriately located as a Light Industrial designation. The site adjoins the Tacoma landfill and there are no sensitive uses to buffer or to require a transition.

**GOAL DD–10: Ensure that all citizens have nearby, convenient and equitable access to healthy foods.**

- NewCold’s design and scale provide great value to the food manufacturers we partner with
  - Food Supply Chain reliability
    - Increased resilience to unforeseen challenges
AMENDMENT APPLICATION PACKET
TO THE COMPREHENSIVE PLAN AND LAND USE REGULATORY CODE

- 2020 Examples include COVID-19, container shortage, labor shortage
  - Food Safety (“cold chain” never broken)
  - Hedge against future cost increases (60% less energy, 75% less labor), providing price stabilization to consumers

Economic Development:

**GOAL EC–1:** Diversify and expand Tacoma’s economic base to create a robust economy that offers Tacomans a wide range of employment opportunities, goods and services.

- The requested designation change would allow NewCold to expand the site in the most optimal way to provide long-term value to our customers and therefore Tacoma’s economy.
- Provide more family-wage jobs in a “new” sector – automated cold logistics.
- Further anchors food manufacturers to the Port of Tacoma


- Information Technology – Automated logistics
- Industrial and manufacturing – NewCold’s warehouse is an essential component of this industry and partners with “blue-chip” food manufacturers.
- International Trade – The site’s strategic focus is to enhance and bring value to this industry. Allowing the site to expand in an optimal way supports this and helps stabilize port operations.

**GOAL EC–2:** Increase access to employment opportunities in Tacoma and equip Tacomans with the education and skills needed to attain high quality, living wage jobs.

- Phase 1 of the site brought approximately 100 jobs to Tacoma
  - Phase 2 (with the designation requested) would generate an estimated 100 new permanent jobs, temporary jobs during any development or construction activities, and seasonal jobs once operations commence.
- Many of the roles NewCold employs require a unique skillset and robust training in the following practices:
  - IT, Logistics, Automation, Engineering, Maintenance, etc.
- NewCold empowers its employees with the on-the-job training to be successful
  - Continually invests in training and mentorship of employees
- Pierce County Average Annual Salary = $44,553
- NewCold Tacoma Average Annual Salary = $64,280
Container Port:

**GOAL CP–3:** Promote the continued growth and vitality of port and port related industrial activity.

NewCold’s core business in Tacoma is to promote the growth and vitality of the port and port related industry. The majority of the products that flow through the Tacoma site pass through the Port of Tacoma, and the same would be true for any future expansion.

**GOAL CP–6:** Identify, protect and preserve the transportation infrastructure and services needed for efficient multimodal movement of goods within and between the Core Area, Industrial/Commercial Buffer Area, and the regional transportation system.

- The NewCold Tacoma site is a key link in the transportation of goods within the region from manufacturers to consumers. Due to NewCold’s highly automated operations and technology, we generate efficiencies within the transportation system that the supply chain otherwise would not offer.

Land Use Regulatory Code:

Under the Land Use Regulatory Code for Industrial zones (13.06.060), a M-1 Light Industrial district (which is appropriate on Light Industrial land under the Comprehensive Plan) “is intended [to act] as a buffer between heavy industrial uses and less intensive commercial and/or residential uses”. The parcel NewCold would like to redesignate is bordered on the north and east by a landfill, and by the remainder of NewCold’s property, which is designated Heavy Industrial and M-2 to the south and west. Though designated as a residential district R-2, the landfill does not and will not function as a residential neighbor to the property. Given that this parcel is not functioning as a true buffer between an industrial use district and a residential use district, NewCold proposes to redesignate this parcel to Heavy Industrial designation, to create consistency with the remainder of the development.
3. **Objectives** – Please describe how the proposed amendment achieves the following objectives, where applicable:

(a) **Address inconsistencies or errors in the Comprehensive Plan or development regulations;**

The proposed amendment will address the current inconsistency in NewCold’s property. The small area of Light Industrial adjacent to the landfill and to the balance of the Heavy Industrial designated land appears to be an oversight or error. It is not consistent with the purpose and other policies cited above. The proposal would correct that.

(b) **Respond to changing circumstances, such as growth and development patterns, needs and desires of the community, and the City’s capacity to provide adequate services;**

There is a growing need for support of port industries and demand for warehousing capacity in the area. The automation and technology within NewCold’s adjacent building requires the Heavy Industrial designation only because of the height of the equipment in the building. Given that this technology was not anticipated in the past, the current designation no longer fits the site and surrounding area or the requirements of the food storage industry.

(b) **Maintain or enhance compatibility with existing or planned land uses and the surrounding development pattern; and**

There are no nearby residences at the parcel with which the proposal would be incompatible. They are separated by distance and existing improvements. The parcel is essentially within the existing developed footprint.

The existing NewCold site development consists of highly automated, heavily industrial equipment. The NewCold High Bay structure is approximately 140 feet tall, consisting of structural steel racking and automated cranes, which operate independently to store and retrieve goods. Additionally, there are thousands of feet of conveyor systems within the warehouse. These are some of the systems that require a Heavy Industrial site designation.

Any future expansion of the facility would also need to be in a Heavy Industrial designated area and this would be consistent with and support the existing facility.

The redesignation of this parcel to Heavy Industrial would encourage NewCold to utilize the area for future expansion in line with our core business. Consistent designation would allow for efficient sharing of existing site infrastructure and resources if an expansion were to occur.

(c) **Enhance the quality of the neighborhood.**

NewCold believes that this redesignation which would allow for further expansion of the site would enhance the quality of the neighborhood, or at the very least have no adverse neighborhood impacts for the reasons outlined above. Further project-specific impacts and neighborhood issues can be considered with a specific rezone proposal in the future, which would require public notice.
and comment. Any proposed future development owned by NewCold would be a facility consistent with the existing building or have another compatible use.

4. Community Outreach – Please provide a description of any community outreach that you have conducted, and the response received, with respect to the proposed amendment.

NewCold has participated in significant community outreach. Some examples of our engagement with the community are:

- NewCold Internship Program with Clover Park Technical College
- Local Charitable Donations/Sponsorships
  - Rainier Highlanders Junior Rugby Club
  - Employee coached AAU Basketball teams
  - Emergency Food Network
  - Community Youth Services

5. Supplemental Information – Please provide supplemental information as you deem appropriate and necessary and/or as may be requested by the Department, which may include, but is not limited to, completion of an environmental checklist, wetland delineation study, visual analysis, or other studies.

Supplemental information is available upon request.

Please see below for photos of the existing site conditions and general area referenced:
## Project Summary

<table>
<thead>
<tr>
<th><strong>Project Title</strong></th>
<th>“South Sound Christian Schools” Land Use Designation Change and Rezoning Request</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Applicant:</strong></td>
<td>South Sound Christian/CenterPoint Christian Fellowship</td>
</tr>
<tr>
<td><strong>Location and Size of Area:</strong></td>
<td>8-Parcels generally adjacent to 2052 South 64th Street 15.96 acres / 694,260 SF</td>
</tr>
<tr>
<td><strong>Current Land Use and Zoning:</strong></td>
<td>Land Use Designation: Single Family Residential Zoning: R-2-STGPD Single Family Dwelling District for many years and is also within the South Tacoma Groundwater Protection District</td>
</tr>
<tr>
<td><strong>Neighborhood Council Area:</strong></td>
<td>South Tacoma</td>
</tr>
<tr>
<td><strong>Date of Report:</strong></td>
<td>4/23/2021</td>
</tr>
<tr>
<td><strong>Proposal Summary:</strong></td>
<td>“South Sound Christian Schools” – seeking land use designation changes on 8 parcels near Tacoma Mall Boulevard and S. 64th St. to allow for multi-family and commercial uses on some of the parcels; and</td>
</tr>
</tbody>
</table>

---

**Planning and Development Services**  
City of Tacoma, Washington  
Peter Huffman, Director  

**Project Manager**  
Contact information  
Larry Harala, Senior Planner  
(253) 318-5626  
lharala@cityoftacoma.org  
www.cityoftacoma.org/planning
Section A. Proposed Scope of Work

1. Area of Applicability

Site Location:

SITE LOCATION:
8 Parcels totally approximately 15.96 acres.

Address:
4601 S Orchard St
APN: 0220133049
Parcel numbers 032030-1024 and 032030-1189 (referred to as Parcel “A” and “B” on the maps below). Located south of South 66th Street the 2.38-acre and 0.179-acre parcels are owned by South Sound Christian Schools. Parcel A currently has multiple buildings on site and parking and is used for administrative purposes. The southernmost portion of the parcel is undeveloped and forested. Parcel B is undeveloped and currently used as a vegetable garden.

Parcels 032030-1073 and 032030-1075 (referred to as Parcels “C” and “D” respectively) are owned by South Sound Christian and are part of the Tacoma Baptist School site. The sites total 7.34 acres and contain the school, gymnasium, a large field and associated parking for the uses.

Parcels 302030-1193 and 032030-1194 (referred to as Parcels “E” and “F” respectively) are owned by South Tacoma Baptist Church (CenterPoint Christian Fellowship). Both parcels are undeveloped and located east of the Tacoma Baptist School site and north of CenterPoint Church. Together, the two parcels total approximately 2.06 acres.

Parcel 032030-1159 (referred to as Parcel “G”) is owned by South Tacoma Baptist Church (CenterPoint Christian Fellowship) This parcel consists of 4 acres and contains the church and associated parking. Additionally, parcel 032030-1158 (referred to as Parcel “H”) is a parcel set aside for tax exemption status for CenterPoint Christian Fellowship, totals 1-acre in area and is not shown on the map with a parcel outline as it is contained within the 4 acres of Parcel 032030-1159 (Parcel “G”).
2. Background

The subject parcels presently contain a mix of uses but are primarily religious institution and educational institution developments. The parcel owners are working together on a joint application and wish to sell and/or redevelop portions of the site for multi-family development and general commercial development. They applicant hopes to work with Bargreen Ellingson a South Sound area restaurant supply and design company who wishes to expand their operations in the area.

This area has been zoned R-2-STGPD Single Family Dwelling District for many years and is also within the South Tacoma Groundwater Protection District (TMC 13.09).

Two years ago, the parcel south of South 66th Street ("A") was designated Multi-Family (Low Density), but during the FLUM process last year the Planning Commission recommended re-designating the site as Single Family Residential, given the assumed educational use and adjacent lands. Council approved that recommendation. However, the site was changed under a mistaken understating that the parcel is used for educational purposes. It is not, and has not, been used for educational purposes for over 15 years. The school functions on an entirely separate, larger property to the north, with the buildings on the parcel used only for storage and administrative offices. The proposal is to change the designation back to Multi-Family (Low Density) and include the two larger parcels to the north as well.

While beginning to research this change, it came to the applicant’s attention that other comprehensive plan amendments and rezones were desired in the area; therefore, the change in designation to General Commercial at the CenterPoint Church property is included in this proposal. Within the last few years parcels E, F, G, and H were designated as General Commercial, which was changed to residential during that same cycle that changed Parcel A.

No onsite uses would become nonconforming with the proposed changes. Religious assembly and schools are conditional uses in the R4-L zone and permitted in the C-2 zone.

3. Policy Framework

The Future Land Use Map designates the subject parcels as Single Family Residential. For parcels C - H, the adjacent future land use designations include Neighborhood Commercial and General Commercial to the East; Parks and Open Space, and Neighborhood and General Commercial to the north; Single Family Residential, Parks and Open Space, and Neighborhood and General Commercial to the south. For parcel A and B, south of 66th Street, the adjacent future land use designations include Parks and Open Space, Neighborhood Commercial, and Multi-Family (Low Density) to the east, Single Family Residential to the south and north, and Multi-Family (Low Density) and Single Family Residential to the west. Amending the comprehensive plan land use designations would provide for consistency with the surrounding area and with the comprehensive plan. The following lists the relevant comprehensive plan goals and policies:

- **Policy H–1.3** Encourage new and innovative housing types that meet the evolving needs of Tacoma households and expand housing choices in all neighborhoods. These housing types include single family dwelling units; multi-dwelling units; small units; accessory dwelling units; pre-fabricated homes such as manufactured, modular; co-housing and clustered housing.
- **GOAL H–3** Promote safe, healthy housing that provides convenient access to jobs and to goods and services that meet daily needs. This housing is connected to the rest of the city and region by safe, convenient, affordable multimodal transportation.

- **Policy H–1.9** Apply infill housing approaches to create additional housing opportunities for low and mid-range (Missing Middle) housing types.

- **Policy UF–1.3** Promote the development of compact, complete and connected neighborhoods where residents have easy, convenient access to many of the places and services they use daily including grocery stores, restaurants, schools and parks, that support a variety of transportation options, and which are characterized by a vibrant mix of commercial and residential uses within an easy walk of home.

- **Goal DD–9** Support development patterns that result incompatible and graceful transitions between differing densities, intensities and activities.

- **Policy DD–4.3** Encourage residential infill development that complements the general scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, open space patterns, and landscaping. Allow a range of architectural styles and expression, and respect existing entitlements.

- **GOAL DD–12** Integrate and harmonize development with the natural environment.

The comprehensive amendment to Multi-Family (Low Density) of parcels A-D would aid in the development of a compact, complete neighborhood and acts as infill on what is an otherwise underutilized lot (parcel A). Allowing higher density housing than what is seen on the western parcels creates a transition into the multi-family and commercial land uses and zones to the east and south. Further, the potential for increased density on the property will support the nearby commercial uses.

The comprehensive plan amendment of the eastern parcels, E-H, to General Commercial creates consistency with the designations to the east and south allowing for expansion of commercial uses to the west, in line with how far the designation extends to both the north and south.

### 4. Objectives

a) **Address inconsistencies or errors in the Comprehensive Plan or development regulations;**

   **Response:** In regard to parcel A, the designation was mistakenly changed in the last FLUM amendment cycle as it was thought to house an educational use, when in fact it only houses administrative offices.

b) **Respond to changing circumstances, such as growth and development patterns, needs and desires of the community, and the City’s capacity to provide adequate services;**

   **Response:** The change in the area is evident by the seven parcels (eight including the tax exemption parcel) in this application that are requesting a designation change. Through outreach in the area, it is our understanding that neighboring property owners are in favor of and support this effort. Growth in the area, and the City as a whole, has resulted in the need for more housing options and production. The community’s desires have resulted in a numerous parcel application to provide more commercial and multi-family designations in the neighborhood so that the City has more housing options and commercial land in a place that makes sense for growth and is contiguous with similar designations.
c) Maintain or enhance compatibility with existing or planned land uses and the surrounding development pattern; and

**Response:** The change in designation from Single Family Residential to General Commercial would be consistent with the existing and planned land uses to the north, south, and east. The change in designation from Single Family Residential to Multi-Family Low Density would be consistent with the designation and existing land uses to the west and southeast. Further the multi-family designation would provide for a better transition between the low-density housing to the west and the commercial development to the east. It would also create consistency with the single, multi-family designated parcel to the west, eliminating that spot zone.

d) Enhance the quality of the neighborhood.

**Response:** The changes in the comprehensive plan designation enhance the quality of the neighborhood by providing for a better transition between the single-family residential designation and the commercial designation. The multi-family designation will allow for investment in this neighborhood and the production of low-density multi-family units. These units will support a diversity of housing in a neighborhood that is currently dominated by single family homes. It will also provide more, higher density housing in a location that is walkable to commercial uses and compatible with the neighboring multi-family uses.
5. Options Analysis

The application contains a complex plan involving 8 parcels, the proposal could be reduced in scope to contain fewer parcels in the application. Some of the reason being cited, a desire to develop multi-family may be mitigated with upcoming Home in Tacoma possible code changes and/or areawide rezoning, the applicant could wait until next year to see if changes are substantial enough to allow some or all of this project to be completed without requiring a comprehensive plan amendment, and rezoning request. However, at this time the outcome of the Home in Tacoma program is uncertain, and so any consideration of that program would be speculative.

6. Proposed Outreach

The applicant stated that preliminary outreach has already been done to neighboring properties that are active (Seattle Lighting is out of business). Through speaking with these properties, it is our understanding that neighboring property owners are in favor of and support this effort. First Western Properties to the east, and Bargreen-Ellingson to the south have both voiced support of this effort. Outreach to other neighboring properties is underway.

Staff would recommend a robust localized outreach for this project particularly including surrounding potentially impacted neighborhoods and expanded notice will be warranted. The continuing complexities around public meetings...
continues due to Covid-19. Staff is hopeful that by the early fall physical public meetings will again be possible. A hybrid approach incorporating online meetings and physical meetings will likely be necessary going forward.

In addition to the considerations for virtual meetings and expanded notice, standard City of Tacoma Planning and Development Services outreach would be conducted including mailings and a webpage. Press releases would be issued in advance of meetings. There is a possibility that there could be a need for multiple neighborhood meetings depending on interest and concerns expressed by area residents.

7. Impacts Assessment

Input from the surrounding neighborhoods will be important in evaluating concerns from area residents that may help identify potential impacts from more commercial property in the area. It is possible that there may be an increase in noise, light and vehicle trips that have impacts to adjacent low density residential areas. The applicant states they are working with a local company that may be interested in development of a commercial facility that could generate substantially more vehicle trips and possibly truck traffic as well.

8. Supplemental Information

It is possible that a preliminary traffic study may be in order to assess what the possible impacts to adjacent roadways might be.

Section B. Assessment

The applications were reviewed against the following assessment criteria pursuant to TMC 13.02.070.E:

1. If the amendment request is legislative and properly subject to Planning Commission review, or quasi-judicial and not properly subject to Commission review.

   **Staff Assessment:** The amendment is legislative and properly subject to Planning Commission review.

2. If there have been recent studies of the same area or issue, which may be sufficient cause for the Commission to decline further review, or if there are active or planned projects that the amendment request can be incorporated into.

   **Staff Assessment:** Staff has not found similar recent requests, nor are there pending similar applications for the subject site.

3. A preliminary staff review of the application submittal.

   **Staff Assessment:** The application is complete and ready for Planning Commission assessment.

4. Identification of the other amendment options the Planning Commission could consider in addition to the amendment as proposed by the applicant; and

   **Staff Assessment:** Given the applicants expressed intent to utilize the site with a heavy industrial use, staff does not identify added options.
5. If the amount of analysis necessary is reasonably manageable given the workloads and resources of the Department and the Commission, or if a large-scale study is required, the amendment request may be scaled down, studied in phases, delayed until a future amendment cycle, or declined.

**Staff Assessment:** The proposal as submitted should be reasonable to manage by staff given the current workload and resources of the department and commission.

The following sections to be completed after public hearing:

**Section C. Summary of Public Comments**

<table>
<thead>
<tr>
<th>Issue</th>
<th>Staff Response</th>
</tr>
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<tbody>
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**Section D. Recommendation**

According to TMC 13.02.070, the Planning Commission will review this assessment and make its decision as to:

1. Whether or not the application is complete, and if not, what information is needed to make it complete;
2. Whether or not the scope of the application should be modified, and if so, what alternatives should be considered; and

**Next Steps**

- May 19th, the Planning Commission will be asked to set the public scoping hearing for all applications.
- June 16th – Public Scoping Hearing
- July 21st – Planning Commission final determination on acceptance of applications.

**Exhibits**

- Application
# AMENDMENT APPLICATION PACKET
TO THE COMPREHENSIVE PLAN AND LAND USE REGULATORY CODE

## APPLICATION
Proposed Amendments to the Comprehensive Plan and/or Land Use Regulatory Code

<table>
<thead>
<tr>
<th>For Office Use Only</th>
<th>Application No.:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date Received:</td>
<td></td>
</tr>
<tr>
<td>Application Fee: $1,400</td>
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</tbody>
</table>

### Type of Amendment
- □ Comprehensive Plan Text Change
- ☑ Land Use Designation Change
- □ Interim Zoning or Moratorium
- □ Regulatory Code Text Change
- □ Area-wide Rezone

### Summary of Proposed Amendment
To reclassify eight parcels, totaling approximately 15.96 acres of property, designated as Single Family Residential to Multi-Family (Low Density) and General Commercial.

**Additional Contact (Agent):**
Emily Adams, AHBL
253-284-0263
eadams@ahbl.com

### Applicant
<table>
<thead>
<tr>
<th>Name</th>
<th>Ron Nelson</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affiliation / Title</td>
<td>Board Treasurer, South Sound Christian Schools</td>
</tr>
<tr>
<td>Address</td>
<td>2052 South 64th Street</td>
</tr>
<tr>
<td></td>
<td>Tacoma, WA 98409</td>
</tr>
<tr>
<td>E-mail</td>
<td><a href="mailto:ronnelson10@gmail.com">ronnelson10@gmail.com</a></td>
</tr>
<tr>
<td>Phone</td>
<td>253-377-5145</td>
</tr>
</tbody>
</table>

### Co-Applicant, or Additional Contact (If applicable)
<table>
<thead>
<tr>
<th>Name</th>
<th>Bill Herried</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affiliation / Title</td>
<td>Centerpoint Christian Fellowship</td>
</tr>
<tr>
<td>Address</td>
<td>2041 S. 66th St</td>
</tr>
<tr>
<td></td>
<td>Tacoma, WA 98409</td>
</tr>
<tr>
<td>E-mail</td>
<td><a href="mailto:bill@cpcf.org">bill@cpcf.org</a></td>
</tr>
<tr>
<td>Phone</td>
<td>253-970-9714</td>
</tr>
</tbody>
</table>

I hereby state that I am the applicant listed above and the foregoing statements and answers made, and all the information and evidence submitted are, in all respects and to the best of my knowledge and belief, true and complete. I understand that submitting this application does not result in automatic acceptance of this application or guarantee its final approval.

Signature: [Signature]
Date: [Date]
Required Questionnaire

The applicant is responsible for providing complete and accurate information in response to the following questions. You may type in the space under each question or provide your answers in text and/or graphic form on separate sheets of paper and reference the question numbers in your answer. List and label all applicable attachments that are included with the application. The Planning Commission and Department staff reserve the right to request additional information as needed. Any modification to the application must be submitted prior to the deadline. A pre-application meeting with staff before submitting an application is strongly advised.

1. Project Summary – Please provide the following information:
   (a) A description of the proposed amendment, including the amendatory language, if applicable;
   (b) A description, along with maps if applicable, of the area of applicability and the surrounding areas, including identification of affected parcels, ownership, current land uses, site characteristics, and natural features; and
   (c) The current and proposed Comprehensive Plan land use designation and zoning classification for the affected area.

2. Background – Please provide appropriate history and context for the proposed amendment, such as prior permits or rezones, concomitant zoning agreements, enforcement actions, or changes in use.

3. Policy Review – Please identify and cite any applicable policies of the Comprehensive Plan and/or Land Use Regulatory Code that provide support for the proposed amendment.

4. Objectives – Please describe how the proposed amendment achieves the following objectives, where applicable:
   (a) Address inconsistencies or errors in the Comprehensive Plan or development regulations;
   (b) Respond to changing circumstances, such as growth and development patterns, needs and desires of the community, and the City’s capacity to provide adequate services;
   (c) Maintain or enhance compatibility with existing or planned land uses and the surrounding development pattern; and
   (d) Enhance the quality of the neighborhood.

5. Community Outreach – Please provide a description of any community outreach that you have conducted, and the response received, with respect to the proposed amendment.

6. Supplemental Information – Please provide supplemental information as you deem appropriate and necessary and/or as may be requested by the Department, which may include, but is not limited to, completion of an environmental checklist, wetland delineation study, visual analysis, or other studies.
March 30, 2021

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

Project: South Sound Christian Schools & CenterPoint Christian Fellowship, AHBL  
No. 2200382.10/.30  
Subject: Comprehensive Plan Amendment Application

Dear Mr. Wung:

Thank you for your and City staff’s help and insight as we have worked to complete this application for the 2022 Comprehensive Plan Amendment cycle. This letter will provide all the items listed in the “required questionnaire” section of the application. The application itself is attached.

1. Project Summary
   a) A description of the proposed amendment, including the amendatory language, if applicable;
      Response: To reclassify approximately 15.96 acres of property designated as Single Family Residential to Multi-Family (Low Density) and General Commercial.

   b) A description, along with maps if applicable, of the area of applicability and the surrounding areas, including identification of affected parcels, ownership, current land uses, site characteristics, and natural features; and
      Response: Parcels included in the comprehensive plan amendment proposal includes:
      - Parcel numbers 032030-1024 and 032030-1189 (referred to as Parcel “A” and “B” on the maps below). Located south of South 66th Street the 2.38-acre and 0.179-acre parcels are owned by South Sound Christian Schools. Parcel A currently has multiple buildings on site and parking and is used for administrative purposes. The southernmost portion of
the parcel is undeveloped and forested. Parcel B is undeveloped and currently used as a vegetable garden.

- Parcels 032030-1073 and 032030-1075 (referred to as Parcels “C” and “D” respectively) are owned by South Sound Christian and are part of the Tacoma Baptist School site. The sites total 7.34 acres and contain the school, gymnasium, a large field and associated parking for the uses.

- Parcels 302030-1193 and 032030-1194 (referred to as Parcels “E” and “F” respectively) are owned by South Tacoma Baptist Church (CenterPoint Christian Fellowship). Both parcels are undeveloped and located east of the Tacoma Baptist School site and north of CenterPoint Church. Together, the two parcels total approximately 2.06 acres.

- Parcel 032030-1159 (referred to as Parcel “G”) is owned by South Tacoma Baptist Church (CenterPoint Christian Fellowship) This parcel consists of 4 acres and contains the church and associated parking. Additionally, parcel 032030-1158 (referred to as Parcel “H”) is a parcel set aside for tax exemption status for CenterPoint Christian Fellowship, totals 1-acre in area and is not shown on the map with a parcel outline as it is contained within the 4 acres of Parcel 032030-1159 (Parcel “G”).
c) **The current and proposed Comprehensive Plan land use designation and zoning classification for the affected area.**

**Response:** The properties currently have a future land use designation of Single Family Residential and are zoned R2. The proposed amendment is to change the existing comprehensive plan designation from Single Family Residential to Multi-Family Residential (Low Density) on the western 4 parcels (A, B, C, and D) and General Commercial on the eastern 4 parcels (E, F, G, and H).

If the comprehensive plan amendment is approved, future development of parcel A, located south of 66th Street, is envisioned as a rezone from R2 to R4L and a two-lot short plat. The new north parcel would remain school property and continue its use as an administrative building and the new southern parcel, along with the adjacent parcel B, would be sold to be developed with multi-family. It would further be proposed that the South Sound Christian School site (parcels C and D) also be rezoned to R4L. The parcels proposed to be designated as General Commercial (E, F, G, H) would be
proposed to be rezoned correspondingly to C-2. Parcels E and F have a proposed buyer/developer lined up for the properties should they be rezoned to C-2. The user would be Bargreen Ellingson, which is currently located south of the parcels, across 66th Street. Bargreen Ellingson intends to expand their operations and move a portion of their Fife operations to this site.

Figure 2: Existing and Proposed Site FLUM Designations

2. Background
Two years ago, the parcel south of South 66th Street (“A”) was designated Multi-Family (Low Density), but during the FLUM process last year the Planning Commission recommended re-designating the site as Single Family Residential, given the assumed educational use and adjacent lands. Council approved that recommendation. However, the site was changed under a mistaken understating that the parcel is used for educational purposes. It is not, and has not, been used for educational purposes for over 15 years. The school functions on an entirely separate,
larger property to the north, with the buildings on the parcel used only for storage and administrative offices. The proposal is to change the designation back to Multi-Family (Low Density) and include the two larger parcels to the north as well.

While beginning to research this change, it came to the applicant’s attention that other comprehensive plan amendments and rezones were desired in the area; therefore, the change in designation to General Commercial at the CenterPoint Church property is included in this proposal. Within the last few years parcels E, F, G, and H were designated as General Commercial, which was changed to residential during that same cycle that changed Parcel A.

No onsite uses would become nonconforming with the proposed changes. Religious assembly and schools are conditional uses in the R4-L zone and permitted in the C-2 zone.

3. **Policy Review**

The Future Land Use Map designates the subject parcels as Single Family Residential. For parcels C - H, the adjacent future land use designations include Neighborhood Commercial and General Commercial to the East; Parks and Open Space, and Neighborhood and General Commercial to the north; Single Family Residential, Parks and Open Space, and Neighborhood and General Commercial to the south. For parcel A and B, south of 66th Street, the adjacent future land use designations include Parks and Open Space, Neighborhood Commercial, and Multi-Family (Low Density) to the east, Single Family Residential to the south and north, and Multi-Family (Low Density) and Single Family Residential to the west. Amending the comprehensive plan land use designations would provide for consistency with the surrounding area and with the comprehensive plan. The following lists the relevant comprehensive plan goals and policies:

**Policy H−1.3** Encourage new and innovative housing types that meet the evolving needs of Tacoma households and expand housing choices in all neighborhoods. These housing types include single family dwelling units; multi-dwelling units; small units; accessory dwelling units; pre-fabricated homes such as manufactured, modular; co-housing and clustered housing.

**GOAL H−3** Promote safe, healthy housing that provides convenient access to jobs and to goods and services that meet daily needs. This housing is connected to the rest of the city and region by safe, convenient, affordable multimodal transportation.

**Policy H−1.9** Apply infill housing approaches to create additional housing opportunities for low and mid-range (Missing Middle) housing types.
Policy UF-1.3 Promote the development of compact, complete and connected neighborhoods where residents have easy, convenient access to many of the places and services they use daily including grocery stores, restaurants, schools and parks, that support a variety of transportation options, and which are characterized by a vibrant mix of commercial and residential uses within an easy walk of home.

Goal DD–9 Support development patterns that result incompatible and graceful transitions between differing densities, intensities and activities.

Policy DD–4.3 Encourage residential infill development that complements the general scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, open space patterns, and landscaping. Allow a range of architectural styles and expression, and respect existing entitlements.

GOAL DD–12 Integrate and harmonize development with the natural environment.

The comprehensive amendment to Multi-Family (Low Density) of parcels A-D would aid in the development of a compact, complete neighborhood and acts as infill on what is an otherwise underutilized lot (parcel A). Allowing higher density housing than what is seen on the western parcels creates a transition into the multi-family and commercial land uses and zones to the east and south. Further, the potential for increased density on the property will support the nearby commercial uses.

The comprehensive plan amendment of the eastern parcels, E-H, to General Commercial creates consistency with the designations to the east and south allowing for expansion of commercial uses to the west, in line with how far the designation extends to both the north and south.

4. Objectives

a) **Address inconsistencies or errors in the Comprehensive Plan or development regulations:**
Response: In regard to parcel A, the designation was mistakenly changed in the last FLUM amendment cycle as it was thought to house an educational use, when in fact it only houses administrative offices.

b) **Respond to changing circumstances, such as growth and development patterns, needs and desires of the community, and the City’s capacity to provide adequate services:**
Response: The change in the area is evident by the seven parcels (eight including the tax exemption parcel) in this application that are requesting a designation change. Through outreach in the area, it is our understanding that neighboring property owners are in favor of and support this effort. Growth in the area, and the City as a whole, has resulted in the need for more housing options and production. The community’s desires have resulted in a numerous parcel application to provide more commercial and multi-family designations in the neighborhood so that the City has more housing options and commercial land in a place that makes sense for growth and is contiguous with similar designations.

c) Maintain or enhance compatibility with existing or planned land uses and the surrounding development pattern; and

Response: The change in designation from Single Family Residential to General Commercial would be consistent with the existing and planned land uses to the north, south, and east. The change in designation from Single Family Residential to Multi-Family Low Density would be consistent with the designation and existing land uses to the west and southeast. Further the multi-family designation would provide for a better transition between the low-density housing to the west and the commercial development to the east. It would also create consistency with the single, multi-family designated parcel to the west, eliminating that spot zone.

![Figure 3: Existing Multi-Family Designations](image)
d) **Enhance the quality of the neighborhood.**

Response: The changes in the comprehensive plan designation enhance the quality of the neighborhood by providing for a better transition between the single-family residential designation and the commercial designation. The multi-family designation will allow for investment in this neighborhood and the production of low-density multi-family units. These units will support a diversity of housing in a neighborhood that is currently dominated by single family homes. It will also provide more, higher density housing in a location that is walkable to commercial uses and compatible with the neighboring multi-family uses.

![Figure 4: Existing Land Uses](image)

5. **Community Outreach**

Outreach has been done to neighboring properties that are active (Seattle Lighting is out of business). Through speaking with these properties, it is our understanding that neighboring property owners are in favor of and support this effort. First Western
Properties to the east, and Bargreen-Ellingson to the south have both voiced support of this effort. Outreach to other neighboring properties is underway.

6. Supplemental Information
No supplemental information has been prepared at this point.

Thank you again for your assistance throughout the process. Please feel free to contact me via phone, 253-284-0263, or email, eadams@ahbl.com, if you have any questions or comments during the review of our proposal.

Sincerely,

Emily Adams, AICP
Project Planner
AHBL, Inc.

EA/wc