To: Planning Commission
From: Adam Nolan, Planning Services Division
Subject: 2023 Amendment – “Mor Furniture” Application
Memo Date: October 28, 2022
Meeting Date: November 2, 2022

Action Requested:
Comment and Direction

Discussion:
At the next meeting the Planning Commission on November 2, 2022, staff will provide an update on the “Mor Furniture” Application as part of the 2023 Annual Amendment to the One Tacoma Comprehensive Plan and Land Use Regulatory Code (“2023 Amendment”).

Staff will provide updates on outreach and engagement, and comments and questions received to date concerning the “Mor Furniture” application. Staff will also provide a status of technical analysis being conducted, including a draft Compatibility Assessment and a draft Impacts Analysis (both attached). Staff plans to return to the Commission in Early 2023 with a full staff analysis report and additional information.

Prior Actions:
• July 20, 2022 – Assessment of the application and determination to move forward

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. The process for the 2023 Amendment began with accepting applications during January-March 2022 and is slated for completion in June 2023.

Staff Contact:
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Attachments:
1. Attachment A: Draft Compatibility Analysis
2. Attachment B: Draft Impacts Analysis

Peter Huffman, Director
Attachment A: DRAFT Compatibility Analysis - Mor Furniture Land Use Designation Request

Tacoma Municipal Code 13.02.070.D requires an analysis of the application against the following objectives:

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/or
d) Enhance the quality of the neighborhood.

This draft analysis is responding to Objective C above: “Land Use Compatibility.”

**North Transition**

The parcels to the north are currently designated and zoned for general commercial use. A Mor furniture store could be located on parcels, B, C, D, and E under current zoning and a Macy’s furniture store is located to the north across S. 48th Street.

**West Transition**

To the west, the subject property abuts I-5, but uses to the west of I-5, both in the Tacoma Mall Regional Growth Center and along Tacoma Mall Boulevard are compatible with the proposed general commercial designation.

**South Transition**

The parcels to the south are owned by the school district. The nearest residential property is 600’ to the south and separated by four school owned parcels.

**East Transition**

While the middle school is designated as Low-scale Residential, it provides a use and intensity transition between the subject property to the west and the residential areas to the east. This use transition would minimize the sense of impact that could occur if a general commercial use were developed immediately abutting an established residential use pattern.

**School Compatibility**

The primary potential conflict with the school relates to impacts on walkability and safe routes to school. See the comments on access below. There are existing undeveloped areas between the subject site and school access and site improvements would require transition areas, landscaping, and other mitigation measures to avoid impacts on the school property.

**Access Compatibility**

Access to the subject parcel is limited. Based on the current lot configuration and access, the proposed use, consolidated as part of a development site with parcels B, C, D and E provides the opportunity to access the site directly off S. 48th Street, minimizing impacts to the school and pedestrians. It is likely that residential development under the current zoning would be more likely to seek access off S. 49th Street, creating more traffic and potential conflict at that location. Additional information will be provided in the Traffic Impact Analysis.
Attachment B: DRAFT Impacts Analysis - Mor Furniture Land Use Designation Request

Analysis Requirements

Tacoma Municipal Code 13.02.070.F requires the following analysis of proposed amendments, including as appropriate:

a) A staff analysis of the application in accordance with the elements described in 13.02.070.D;
b) An analysis of the consistency of the proposed amendment with State, regional and local planning mandates and guidelines;
c) An analysis of the amendment options identified in the assessment report;
d) An assessment of the anticipated impacts of the proposal, including, but not limited to: economic impacts, noise, odor, shading, light and glare impacts, aesthetic impacts, historic impacts, visual impacts, and impacts to environmental health, equity and quality

Baseline Assumptions

As a baseline for this analysis, we assume that the subject site (Parcel A) would otherwise be developed under the existing zoning for low scale residential development. The baseline assumes, therefore, that the site would likely generate additional vehicle trips and result in an increase in impervious surface resulting from development under the baseline land use designation. Furthermore, the baseline assumes commercial development on parcels B, C, D and E under the existing C-2 General Commercial zoning. This analysis is focused on the additional impact that may result from the proposed land use designation change for the subject site only. Lastly, while the request is in support of a specific project, we must assume that the future land use will allow for general commercial uses and not exclusively the proposed project.

Overall Assessment

The following table assesses the anticipated impact of the proposal. Overall, the staff analysis finds that the impacts of the proposed amendment would likely be addressed adequately through the application of City standards. However, additional analysis will be conducted to fully evaluate traffic impacts, with particular attention to safe routes to school and modal conflicts.

- **Traffic**
  
  Traffic impacts have been identified as significant concerns in informational meetings conducted so far. Student safety is a major concern with the subject site in close proximity to Giaudrone Middle School. Preliminary development plans provided by the applicant indicate that the only access to the subject site would be from S 48th St and through the applicant’s Commercial parcels (Parcels B-E) to the north. S Access through S 48th St would be a likely requirement for proposed projects.

- **Critical areas**
The subject site is in an identified critical area (aquifer recharge area, South Tacoma Groundwater Protection District). There are no other known critical areas or archaeological, cultural, or historic resources on the subject site based on known mapping. Additional site verifications will be required through any future subsequent permitting, including no net loss of critical areas.

- **Tree Canopy**

Trees and greenspace have been identified as significant concerns in informational meetings conducted so far. Staff analysis will include evaluation of City development code and standards to evaluate threshold requirements for landscaping, tree canopy, and street trees. Additional site-specific review is conducted as part of permitting. The City’s site development standards would apply and would likely be an overall net improvement to tree canopy and landscaping on the subject site.

**Additional Analysis**

Staff is conducting additional analysis to better understand current conditions and potential impacts. Staff has requested additional analysis be completed by the applicant, including a Traffic Impact Analysis and Economic Study. Staff is also in consultation with the Tacoma Pierce County Health Department regarding Air Quality analysis. Findings from this analysis will be provided to the Planning Commission as part of the Final Staff Analysis report to be completed in Early 2023.
## Draft Impact Analysis

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- **TMC Title 13 Land Use Regulatory Code**
  - Land Use and Zoning Map

- **TMC 2.19 Site Development Code**

  The subject site is vacant and undeveloped with current land use of “Low-Scale Residential” and Zoning R2-STGPD. No existing dwellings or structures would be demolished as part of future development of this site.

  The subject property is approximately 1.25 acres. Based on the size, the site could accommodate, under existing zoning, approximately 10-11 housing units based on a standard 5,000 sq. ft. lot, though this does not take into account other roadway and site improvements needed to accommodate housing development.

  The area is in proximity to Giaudrone Middle School and single-family residential dwellings that are Low-Scale Residential and R2-STGPD; and General Commercial land uses zoned C2-STGPD.

  Development of the subject site will have impacts on adjacent land uses, but the extent of impacts and need for mitigation measures will be more fully analyzed at the rezone and permit application stages.

  The subject parcel, being located within an identified Critical Area of the South Tacoma Groundwater Protection District Overlay District, may be subject to additional development and use standards, restrictions, and reporting requirements as established in TMC Title 13.06.070.D South Tacoma Groundwater Protection District and TMC 13.11 Critical Areas Preservation.
<table>
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<td>Analysis still to be provided.</td>
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<td>TMC 12.10 Water – Regulations and Rates</td>
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<td>TMC 13.06.070.D South Tacoma Groundwater Protection District</td>
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## TMC 13.11 Critical Areas Preservation

| Addendum to Existing Environmental Document associated with SDEV17-0146 (Permit Issued 7/27/2021) - Addendum for Mor Furniture to address placement of fill on subject site rather than exporting fill onsite. [Closed] |
| SDEV18-0469; S 49th St & 4810 S Wilkeson St - Clear Blackberry bushes and trees; Clear brush and debris to clean up commercial property. (Awaiting Resubmittal/Revisions) |

A search of the Washington State Dept. of Ecology’s “What's in My Neighborhood: Toxics Cleanup” map/database did not reveal any known toxic hazards at the site. The site is within the geographic area of the Tacoma Smelter Plume, and the Dept. of Ecology “Dirt Alert” map/database states that “Predicted Arsenic Concentration: Under 20 ppm.”

## Plants and Tree Canopy

| TMC Title 13 Land Use Regulatory Code |
| TMC 13.06.030.F Commercial District Development Standards |
| TMC 13.06.090.B Landscaping Standards |

Tree canopy on site appears to be negligible and there are no mapped or known priority species on site. Additional site-specific review to identify unknown or potential critical areas is conducted as part of permitting.

Overall, staff expects that future development will result in an increase in tree canopy on site based on current conditions and applicable development regulations. Specific landscaping and Tree Canopy requirements will be evaluated at project level and permitting and will be required to be in accordance with standards set in the Urban Forest Manual.

Tacoma’s Stormwater Management Manual (SWMM) contains the information needed to regulate stormwater management associated with new development, redevelopment, and construction sites in Tacoma. It also contains source control Best Management Practices (BMPs) for existing sites. The SWMM contains information for design and sizing of stormwater facilities that infiltrate. It also has operational Best Management Practices to keep stormwater runoff clean, which helps to ensure contaminants are not transmitted to groundwater.

As a result of these standards, it is unlikely that the proposed development would have a significant adverse impact on water quality.
- Parking lot overall tree planting requirements: One Small Tree per 700 square feet; one Medium Tree per 1,000 square feet; or, one Large Tree per 1,400 square feet of parking lot area.
- Per TMC 13.06.090.B Landscaping Standards, Commercial Zoning Districts have Overall Site Landscaping Minimums of 10 percent, among other standards.
- Site Perimeter Landscaping: A minimum 7-foot-wide site perimeter strip shall be provided on sides without abutting street trees... The perimeter strip shall be covered with a mixture of trees, shrubs, and groundcover plants, as follows:
  (a) At least one Small Tree per 200 sf; one Medium Tree per 300 sf; or one Large Tree per 400 sf of required landscaped area.

**Aesthetics, Light, and Glare**

| TMC 13.06.090 Site Development Standards | The site is currently vacant and undeveloped. There is an existing undeveloped area on the school property to the east that establishes an approximate 100’ separation between the subject property and school access. | Not applicable at this stage of consideration of land use designation change of a vacant/undeveloped parcel. Applicant will be required to meet aesthetic requirements detailed in TMC |
| TMC 13.06.100.A Commercial District Minimum Design Standards | | |
| TMC 13.06.100 Building design standards | 13.06.100.A during project-level development plan review stages. Applicant will be required to meet applicable requirements in project-level stages. With the site in close proximity to residential parcels, additional standards will need to be met per TMC 13.06.090.J Residential transition standards and other applicable requirements. Transition standards include limits on lighting and light trespass as well as the use of landscape buffers to minimize noise, light, and aesthetic impacts on adjacent properties.

Noise-related impacts and mitigations would also be assessed at project-level. Any development would be required to meet the standards detailed in TMC 8.122 Noise Enforcement. |
| --- | --- |
| TMC Title 13.06.090 Site Development Standards  
  - TMC 13.06.090.F Pedestrian and bicycle support standards | The subject site is mapped in the One Tacoma Plan as an educational facility, as it was previously owned by the school district, and is identified as part of the City’s overall park and recreation system.

The following map depicts a ¾ mile radius from the subject site as compared to the City’s planned park and recreation system. While several facilities are within this walk |
| --- | --- |
|  | The proposed land use designation change is not anticipated to displace any existing recreational uses. While the parcel is identified as an educational facility as part of the City’s recreation system, the specific subject site is not improved to provide any recreational value.

The dearth of walkable recreation facilities near this site, and impediments to existing |
distance, the majority of sites require crossing I-5 or other busy arterials. sites, likely would result in new residential development under the baseline zoning being more dependent on SOV trips to meet recreational needs.

### Historic and Cultural Preservation

<p>| TMC 13.12.570 Archaeological, Cultural, and Historic Resources | No known archaeological, cultural, or historic resources on site. No historic districts or overlays apply to the property. | Per TMC 13.12.570.C Unanticipated Discovery of Archaeological, Cultural and Historic Resources, “All permit applications shall prepare a plan for the possible unanticipated discovery of historic, cultural or archaeological resources, including a point of contact, procedure for stop-work notification, and for notification of appropriate agencies.” |</p>
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| **TMC 13.06.090.F Pedestrian and bicycle support standards** | **Auto: Several streets in close proximity to subject site are designated arterials per TMC 11.05.490 Arterial streets designated:**  
- Auto: South 48th Street from Pacific Avenue to Wapato Street is a minor arterial (protected streets that have a near balanced percentage of long-distance vehicle trips, with local access usage)  
- South Alaska Street from 38th Street to 72nd Street is a collector arterial (protected streets that have a low percentage of long-distance vehicle trips)  
A portion of S. 49th Street which serves the subject site has been vacated and is part of parcels B, C, D and E which are zoned for general commercial uses.  
**Auto: Future development of the site will result in increased number of trips intersecting with existing and planned bike infrastructure as well as safe routes to school. The applicant is completing a Traffic Impact Analysis that will provide information about anticipated trip generation and measuring peak volumes (when and projected distributions of vehicle times), especially considering commercial truck traffic.**  
Preliminary site plans indicate that sole access to the site will be from South 48th Street. Emergency vehicle access to the site may be available at South 49th Street. One anticipated impact of development to a commercial use is increased vehicular and truck traffic on roadways within vicinity of the subject parcel. Potential impacts will be access at project-level and subject to TMC Title 13.06.090 Site Development Standards and TMC 13.06.090.F Pedestrian and bicycle support standards.  
**Pedestrian: The Traffic Impact Analysis will help to inform likely impacts on Safe Routes to School and will be provided to the Planning Commission to inform the Commission’s recommendations.** |
| **13.06.100 Building design standards (A. Commercial District Minimum Design Standards)** |  |
| **TMC 13.12.580 Traffic Impact Assessment** |  |
Pedestrians: The neighborhoods surrounding the subject site are generally constructed on a grid with adequate route directness and basic pedestrian facilities. However, the subject site and its immediate vicinity lacks pedestrian connections to the surrounding neighborhoods due to the middle school, I-5, and commercial properties to the north.

Bicycles: The section of S Alaska Street (Collector or Nonclassified Arterial) in vicinity to the subject site does have bicycle lanes. The section of S 48th Street (Minor Arterial) in vicinity to the subject site does not have bicycle-specific infrastructure.

Bicycle: The City’s current plans include future bike facilities at this location and planning studies to evaluate improvements to the I-5 crossing.

Under the baseline zoning, the site could be developed for residential uses. However, residents at this subject site would likely be more auto-dependent due to the lack of immediate connectivity and walkable destinations.