AGENDA

MEETING: Special Meeting and Public Hearing

TIME: Wednesday, May 15, 2019, 6:00 p.m.

LOCATION: Council Chambers, 1st Floor, Tacoma Municipal Building
747 Market Street, Tacoma, WA 98402

A. Call to Order and Quorum Call

B. Approval of Agenda

C. Discussion Items

1. Shoreline Master Program Periodic Review - Joint Public Hearing with the Department of Ecology
   - Conduct a joint public hearing with the Department of Ecology concerning the proposed amendments to the Shoreline Master Program, an Element of the One Tacoma Comprehensive Plan and Land Use Regulatory Code, as part of the 2019 Amendments.
   - Action: Conduct public hearing and leave record open through May 17, 2019
   - Staff Contact: Elliott Barnett, 253-591-5389, elliott.barnett@cityoftacoma.org

2. 2019 Amendments – Public Hearing
   - Description: Conduct the second of two public hearings concerning the 2019 Amendment to the Comprehensive Plan and Land Use Regulatory Code.
   - Sessions: Public testimony will be accepted by topic in the following order. Members of the public who wish to comment on more than one item may do so.
     (1) Affordable Housing Action Strategy Incorporation into Comprehensive Plan
     (2) Historic Preservation Code Amendments
     (3) Manitou Potential Annexation
     (4) Minor Plan and Code Amendments
   - Action: Conduct public hearing and leave record open through May 17, 2019
   - Staff Contact: Stephen Atkinson, 253-591-5531, satkinson@cityoftacoma.org

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D. Topics of the Upcoming Meeting (June 5, 2019)
   (1) Debriefing of 2019 Amendment Public Hearings

E. Communication Items
   (1) The next meeting of the Infrastructure, Planning and Sustainability Committee is on Wednesday, May 22, 2019, at 4:30 p.m., in Room 16; tentative agenda (subject to change) includes: Building Code Updates.
   (2) Tacoma Dome Link Extension (TDLE) – Letters of Scoping Comments to Sound Transit from the City Manager's Office and the Sustainable Tacoma Commission (attached).

F. Adjournment
MINUTES

TIME: Wednesday, May 1, 2019, 6:00 p.m.

PLACE: Council Chambers, Tacoma Municipal Building, 1st Floor, 747 Market Street, Tacoma, WA 98402

PRESENT: Stephen Wamback (Chair), Anna Petersen (Vice-Chair), Carolyn Edmonds, David Horne, Ryan Givens, Andrew Strobel

ABSENT: Brett Santhuff, Jeff McInnis, Dorian Waller

A. CALL TO ORDER AND QUORUM CALL

Chair Wamback called the meeting to order at 6:06 p.m. A quorum was declared.

B. APPROVAL OF AGENDA AND MINUTES

The agenda was approved. The minutes for March 20, April 3, and April 17 were approved as submitted.

C. DISCUSSION ITEMS

1. 2019 Amendment Public Hearing No. 1

Chair Wamback called to order the public hearing at 6:09 p.m., reviewed the public hearing procedures, and asked Commissioners to introduce themselves.

Stephen Atkinson, Planning Services Division, provided an overview of the subject of the public hearing, i.e., Future Land Use Map Implementation. Mr. Atkinson reviewed the amendment process, summary of applications, public notice, SEPA, and how to provide comments.

Chair Wamback called for testimony. The following citizen testified:

- Mary Chambers Little – Ms. Chambers Little is one of 11 heirs to the property at 6638/6640 S. Alaska St., which has been their single family home for over 68 years. However, it no longer benefits anyone as a single family residence. She requested a rezone to either R4 or R4L. She noted that many of the city planners may know that her family has been seeking this change since her mother passed in 2016, and requested that this change be made this year. She feels this change would benefit the entire neighborhood and future development.

- Rosalie McKinney – Ms. McKinney noted that she was not sure if she needed to be at the meeting, but she had looked at the map and could not make heads or tails of it. She was interested in finding out if there was anything in her neighborhood, near North 25th and Lawrence, that she needed to be concerned about.

- Nick Malo – Mr. Malo grew up in Tacoma and bought his first home last May, in the Eastside’s Strawberry Hill neighborhood. He noted that the home’s value is tied to its views. Currently the areas around him are zoned to allow for a maximum height of 35 feet, but the proposed rezones would allow for multi-family homes up to 60 feet, blocking his views. He believes that the proposed changes to East L St. and East 29th St will fundamentally change the neighborhood and negatively impact current and future property owners. He added that he does not feel these changes align with code, and urges the City not to change the zoning districts in that area.

- Tatyana – Lives in Stadium District, and would like there to be studies on the effect that high rise housing has on the environment and on sustainability in a historic area. She thinks it is unacceptable to propose high density housing in a historic neighborhood and that it will destroy the neighborhood.
and its quality. Stated that single home owners are being aggressively displaced in this neighborhood to allow the city to build high-rise multi-family buildings.

- Jason Hixenbaugh – Mr. Hixenbaugh explained that he and his partner moved to Tacoma from Chicago over a year ago. They specifically choose Tacoma over Seattle because of the neighborhood they live in in the Historic Slope. He noted that right now the sightlines are very nice and it is a calm quiet neighborhood. He is concerned that allowing multi-family will make the traffic problem even greater, especially with speeding and uncontrolled intersections.

- Martin Savol – Mr. Savol’s house is designated R2 and is not directly affected by the proposal, but the area across the street from his home is proposed to jump to R4. He and his wife oppose this for several reasons, one being the aesthetics. He also lives on a corner lot with an uncontrolled intersection and there are been no accidents during the 6 years he has lived there, and opposes the potential increase in traffic. Mr. Savol also noted that he lives in a historical area and does not like the idea of a brand new big building right next to historical homes.

- Molly Nichols – Ms. Nichols is a Tacoma Outreach Coordinator with Futurewise and is also a renter who lives in the North End. She is here to support the proposed rezoned that make our zoning consistent with Tacoma’s Comprehensive Plan. She stated that as our region grows we need policies for compact and connected neighborhoods to manage the growth and ensure equitable access. The proposed changes allow for diverse housing options to meet diverse housing needs. Ms. Nichols also noted that the proposed changes begin to address the effects of redlining. She stated that we need zoning to be modified to give developers incentive to build low-income housing which creates mixed-income areas in high-opportunity areas which benefits everyone.

- David Cisakowski – Mr. Cisakowski spoke on the proposed rezone on North 12th and Yakima. He wanted to comment on the selection of areas to create diverse neighborhoods, noting that he lives at the top of North Slope and below him are almost all single family homes, but the only proposed rezones for the area are right by him near the top. It was mentioned in the criteria that these rezones should be by mixed-use centers and transit areas, but this area is not within a quarter mile of these. Mr. Cisakowski noted that it did say these criteria might part of a future development, but expressed that you can’t know where those would be. He feels like there are a lot of other areas that would be able to better provide diversity and multi-family homes.

- Jim Merritt – Mr. Merritt is an architect and urban planner who has worked and volunteered with the City of Tacoma for 40 years. He believes the amendments are misguided on so many levels and are unrealistic, and the spot rezoning would be a disaster for the City of Tacoma and should be rejected by the Planning Commission. He questioned why the North End, with no community center, would be considered more desirable that other locations. Mr. Merritt explained that the Eastside and South End have significant strip development that is under-utilized. He cited Aurora Avenue in Seattle as an example of the wrong way to do development and stated that we are doing the same thing in our city. Mr. Merritt noted that duplexes and triplexes in single family residential can cause issues because of absentee owners, and in many studies an area that goes under 60% home ownership becomes a troubled area. He stated that we need to throw out these amendments and start with a vision of the city at a design level and not just a process level.

- Lew Simpson – Mr. Simpson commented on the 34th and Proctor rezone. The area is slated as multi-use, but the existing commercial is different from 6th Ave or 38th street, it is in existing buildings than have been there for 50-100 years. He noted that in talking to planners, the tone is to bring things into alignment with the use, but he is cynical about that, and that he does not feel good about seeing R3 townhouses in a row versus the elegant old established neighborhood. Mr. Simpson also addressed the bus stop in the area, which is only for one route and is not very utilized. He stated that the rezoning is a concern because of what it could mean to the area. He noted that the good news is that it is not the high density that was put in at 26th and Proctor, but it could still open the door to something that isn’t appropriate.

- Paula Bond – Ms. Bond is a resident of the Stadium District and expressed concern about the proposed rezone for that area. She also wanted to be on record saying that she is concerned with the fact that the Commissioner representing her area is not here this evening or at several of the other meetings.
she has attended. She noted that the Stadium-Seminary Historical District is the oldest historic district in the state of Washington and is one of Tacoma's earliest residential neighborhoods, but there has been a lot of intrusion since it was added to the register. Ms. Bond asked for down-zoning for three families, including her own, and for the Commission to reject the up-zoning proposal overall. She stated that the proposed amendment is in direct conflict with policies that are already in place within the city.

- **Hope Murray** – Ms. Murray represents the homeowners in the Narrows rezone, which would go from an R2 to R4 in the proposal. She noted that this would displace 96 families in a well-established neighborhood. She believes this change would turn the neighborhood into a confused mix of housing, similar to others in Tacoma that she has driven through. Ms. Murray stated that she has done research through the city’s websites and talked to planners, city leadership, and her state legislator, and has found that the rezone is essentially a completed process. Because of this, she feels that the communities have not been heard and that this process lacks transparency.

- **Joyce Jackman** – Ms. Jackman lives in the Narrows district. She stated that 12 years ago her block was approached with the same proposal to change zoning, but at that time there was an attorney living on the block who helped prevent that. She expressed concerns about parking and possible rising crime rates due to renters of multi-family housing. Ms. Jackman noted that she feels listened to but not heard. Tacoma could be the one to set an example that they care about what their citizens want. She expressed that we are not Seattle, and there are so many other areas that can accommodate high rises and multi-family dwellings.

- **Patrick McGoldrick** – Mr. McGoldrick spoke about a property at South 12th and Pine. He owns the property and rents it out, currently it is a bicycle repair shop. He expressed that he would like for it to be left alone, and from what he can tell the neighborhood around it feels the same way.

- **Carl Anderson** – Mr. Anderson lives in City Council district 2, and is generally in favor of the up-zoning proposed. He stated that we need to develop density on transit corridors, and that is the basic tenant of environmentally sound development. He mentioned specifically the Stadium District being transit friendly, with the light rail being expanded and bus stops, and should be up-zoned as such. Mr. Anderson would like to see diverse housing options to meet our diverse needs, including more duplexes, triplexes, and condominium options. He expressed that we need to develop different ways of developing to meet the serious environmental needs of the upcoming century.

- **Ellen Norton** – Ms. Norton is a lifetime resident of the City of Tacoma, and began looking into this because she bought a house 10 years ago in the 26th and Alder neighborhood. She is particularly concerned about the building that contains the Big Value Market. She noted that when she looks at the zoning map, she can’t really make sense of it and does not understand why there are pockets here and there being rezoned. She also mentioned concern for the historic homes in Stadium District, stating that she does not want to see Tacoma tear down something beautiful in order to put up something mediocre. Ms. Norton stated that she actually likes some of the development in Proctor and Stadium districts, but would not like to see a historical home be torn down in order to do that.

- **Debby Wenskill** – Ms. Wenskill lives in the Stadium area. She stated that although her property would not be directly affected, it would potentially be affected when it comes to traffic and parking. She urged the commission to consider parking and design standards when considering development. She would not like to see our city become like Seattle with heavy traffic. Ms. Wenskill added that she agrees with a previous speaker, and would not like to see our city chopped up because it is great right now.

- **Leslie Malo** – Ms. Malo noticed that as we look at the issue at hand there are prominent themes, one being are we planning for things? She agrees with the need to have affordable housing for all and with the concerns over historic buildings, but feels we are building without understanding the impacts. She is concerned with not having studies done before development and the impact that could have for example on traffic and the safety of children and pedestrians.

- **William Bailey** – Mr. Bailey lives in the Central District and spoke about the proposed rezone at South 19th and Proctor. He objects to the rezoning of only the northern part of this area, and stated that it does not consistent with the Comprehensive Plan, as this parcel is separated from arterials and there is
lack of access. He suggested this area is looked at as a modification to the planning designation and leave it zoned as R2.

- Nadiya Sheckler – Ms. Sheckler addressed the Norpoint area that is being up-zoned. Her concern is with the commercial area on 29th and 59th, as the area has a lot of accidents currently. She stated that traffic in that area is already bad with people cutting through to avoid the Fife curve. She also mentioned a residential area on 28th Street NE which buts up against commercial zoning, she feels it would be a good area for up-zoning but it is being ignored.

- Dale Powers – Mr. Powers is also concerned about the up-zoning near Stadium High School. He stated that the area subject to intense traffic and parking is difficult to find. He agrees that density and affordable housing is a great idea, but does not think that area warrants an up-zone at this time.

With no more citizens coming forward to testify, Chair Wamback closed the public hearing at 7:31 p.m. and asked Commissioners to provide feedback as to what additional information would be required of staff to provide at the next meeting.

- Commissioner Givens asked for the comments to be arranged by neighborhood.

- Commissioner Edmonds asked for a close-up map of the Stadium, Narrows, 34th and Proctor, and Northeast neighborhoods, and to know if there are any vacant lots in the proposed re-zoned areas. She asked, if the proposed zoning happens, what the current land use code says in the instance that someone tears down a single family home in order to put up a triplex. Specifically, if there would need to be some assembly of lots. She also noted that some of commercial properties are on tribal land and would like more information on how that impacts zoning. Commissioner Edmonds also asked for clarity on the issue of historical properties, and if the proposed re-zoning would conflict with policies already in place.

- Commissioner Horne wanted to get information about the specific areas that speakers gave as examples of other cities that were negatively impacted by re-zoning.

- Chair Wamback agreed that he would like to have the comments arranged by neighborhood, and would also like to have the maps ready to go on screen so that they are able to zoom in on certain areas.

D. TOPICS OF THE UPCOMING MEETING (MAY 15, 2019)

(1) 2019 Amendment Public Hearing No. 2

E. COMMUNICATION ITEMS

In addition to the information included in the agenda, Brian Boudet, Planning Manager, provided the following:

- Staff will be reaching out to Commissioners for help in recruiting to fill spots on the Advisory Committee for the Design Review Program, as discussed at the April 3rd meeting.

- May 1st was the go live day for the Detached Accessory Dwelling Unit (DADU) regulations. Both the Commission and City Council will be updated on this in the coming months.

- There are 3 topics coming up on City Council’s docket:
  - The public hearing for the JBLM Airport Overlay Zone is scheduled for June 4th.
  - In early June, City Council will be providing a specific resolution or recommendation on which option should move forward into the next phase for the Tacoma Dome Link Extension.
  - The Tide Flats Interim Regulations Renewal first reading is scheduled for May 14th and the second on May 21st.
F. ADJOURNMENT

The meeting adjourned at 7:45 p.m.

*These minutes are not a direct transcription of the meeting, but rather a brief capture. For full-length audio recording of the meeting, please visit:
http://www.cityoftacoma.org/government/committees_boards_commissions/planning_commission/agendas_and_minutes/*
To: Planning Commission
From: Stephen Atkinson, Planning Services Division
Subject: 2019 Amendment Public Hearings
Date: May 8, 2019

For the Meeting of: May 15, 2019
Action Requested: Conduct a public hearing to receive oral testimony and continue to accept written comments through May 17, 2019.

Discussion:
The Planning Commission will conduct two public hearings on May 15, 2019, concerning the Proposed Amendments to the Comprehensive Plan and Land Use Regulatory Code for 2019 (“2019 Amendment”). The first public hearing, concerning the Shoreline Master Program Periodic Review, will be conducted jointly with the Department of Ecology. Following the close of the joint hearing, the Commission will conduct a second public hearing on the remaining four applications. Public testimony on the following items will be conducted in order. Members of the public who wish to testify on more than one item may do so.

(1) Affordable Housing Action Strategy Incorporation into Comprehensive Plan
(2) Historic Preservation Code Amendments
(3) Manitou Potential Annexation
(4) Minor Plan and Code Amendments

Oral testimony will not be accepted on the Future Land Use Map Implementation project at this meeting. The Commission held a public hearing on that proposal on May 1st. Written comments will be accepted on the Future Land Use Map Implementation project through May 17th at 5:00 p.m.

The May 15th meeting is a Special Meeting because the starting time is changed from the regularly scheduled 5:00 p.m. to 6:00 p.m. An Informational Meeting will be conducted by planning staff between 5:00 and 6:00 p.m. to provide an opportunity for interested citizens to learn more about the subject of the public hearing.

Public Review Document

Environmental Evaluation
Pursuant to Washington Administrative Code (WAC) 197-11 and Tacoma's SEPA procedures, a Preliminary Determination of Environmental Nonsignificance was issued on April 19, 2019.
(SEPA File Number LU19-0068), based upon a review of an environmental checklist. The City will reconsider the preliminary determination based on timely public comments regarding the checklist and determination that are received by 5:00 PM on May 17, 2019 and unless modified, the preliminary determination will become final on May 24, 2019.

**Notification**

Notification for the public hearing has been conducted to reach a broad-based audience, through the following efforts:

1. **Public Notices** – The notices for both Public Hearing No. 1 and No. 2 were mailed to approximately 21,000 individuals and entities within and within 1,000 feet of the FLUM affected areas, and mailed and emailed to the Planning Commission’s interested parties list that includes the City Council, Neighborhood Councils, area business district associations, the Puyallup Tribal Nation, adjacent jurisdictions, City and State departments, and others.

2. **Library** – A request was made to the Tacoma Public Library on April 22, 2019 to make the public hearing notices available for patrons’ review at all branches.

3. **News Media** – The City of Tacoma issued a News Release on April 17, 2019. An online advertisement was placed on The News Tribune to run between April 17 and May 15. A legal notice concerning the SEPA Checklist and the public hearings was posted on the Tacoma Daily Index on April 26, 2019.

4. **Social Media**: A Facebook event page for the Public Hearing is available at [First Public Hearing & Informational Meeting-2019 Amendments](#) AND [Second Public Hearing & Informational Meeting-2019 Amendments](#)

5. **60-Day Notices** – A “Notice of Intent to Adopt Amendment 60 Days Prior to Adoption” was sent to the State Department of Commerce (per RCW 36.70A.106) on April 19, 2019. A similar notice was sent to the Joint Base Lewis-McChord (per RCW 36.70A.530(4)) on April 19, 2019, asking for comments within 60 days of receipt of the notice.

6. **Tribal Consultation** – A letter was sent to the chairman of the Puyallup Tribe of Indians on April 22, 2019 to formally invite the Tribe’s consultation on the 2019 Amendment.

**Project Summary:**

The City considers changes, additions, and updates to the *One Tacoma* Comprehensive Plan and Land Use Regulatory Code on an annual basis pursuant to the State Growth management Act. Periodic review and evaluation are important in order to ensure that the *One Tacoma* Plan and the implementing regulations maintain their effectiveness. The intent of the amendment process is to review all of these changes simultaneously, where appropriate, so that the cumulative effects can be considered.

Prior Actions:

- The Planning Commission reviewed the draft scope of work for the 2019 Amendment on May 2, 2018; conducted a public scoping hearing on June 6, 2018; and completed the assessment process for the 2019 Amendment on June 20, 2018.

- From July 2018 to March 2019, the Planning Commission reviewed staff analyses for individual applications and upon completing the review of each application released it for public review. Such actions of the Commission took place at the following 12 meetings: July 18, 2018; September 5, 2018; September 19, 2018; October 3, 2018; November 7, 2018; December 5, 2018; December 19, 2018; January 16, 2019; February 6, 2019; February 20, 2019; March 6, 2019; and March 20, 2019.

- On March 20, 2019, the Planning Commission released the entire 2019 Amendment package for public review and set May 1 and May 15, 2019 as the dates for two public hearings.

- On May 1, 2019 the Commission conducted a public hearing on the Future Land Use Map implementation project.

Staff Contact:
Stephen Atkinson, Principal Planner, 253-591-5531, satkinson@cityoftacoma.org

Attachment:
- Notice of 2019 Amendment Public Hearing No. 2

Peter Huffman, Director
WHAT IS THE 2019 AMENDMENT PROCESS?

The 2019 Amendment to the Comprehensive Plan and Land Use Regulatory Code is a process through which the City considers changes, additions, and updates to the One Tacoma Plan and the Land Use Code. The Planning Commission will consider public testimony prior to formalizing a recommendation to the City Council. The City Council will also conduct a public hearing prior to taking action on any proposals. You are receiving this notice because the proposed amendments may affect your property.

1. Shoreline Master Program - Periodic Review

The City of Tacoma is conducting a periodic review of the TSMP, as required every eight years by the Shoreline Management Act (RCW 90.58). The TSMP is Tacoma’s policy and regulatory framework for activities within designated shoreline areas. This review is not a major update, but reflects changes in state laws and rules, changes to Tacoma’s Comprehensive Plan and regulations and new information and improved data since the major update completed in 2013.

The City and Department of Ecology will conduct a Joint Public Hearing to solicit input on the proposals.
2. Affordable Housing Action Strategy

This proposed amendment would formally recognize the Affordable Housing Action Strategy as an implementation element of the One Tacoma Comprehensive Plan. The AHAS is a strategic response to a changing housing market, increasing displacement pressure, and a widespread need for high-quality, affordable housing opportunities for all.

3. Historic Preservation Code Amendments

This proposal seeks to improve the effectiveness of the Historic Preservation Program through a series of code amendments, including: enhancement of demolition/cultural resources impact review within TMC 13.12.570; enhancements to TMC 13.07, including clarification of the nomination and designation process and project review, and the Historic Conditional Use Permit at TMC 13.06.640 F.

4. Manitou Potential Annexation

Working collaboratively with Pierce County on the proposed annexation of the Manitou Area near Lakewood Dr. W. and 66th St. W. and updating the proposed land use designations and zoning classifications to be applicable to the area if and when the annexation becomes effective.

5. Minor Plan and Code Amendments

Amendments to various sections of the Tacoma Municipal Code intended to correct minor errors, address inconsistencies, and improve provisions that, through administration and application of the code, are found to be unclear or not fully meeting their intent.

TO REVIEW THE PROPOSALS:

- The full Public Review Document for the 2019 Amendments as well as individual project pages and staff contact information, is available at: www.cityoftacoma.org/2019amendments
- For more information: planning@cityoftacoma.org (253) 591-5030 (select option 4)

TO PROVIDE COMMENTS:

Comments may be submitted on the proposals on or before May 17, 2019 at 5:00 PM.

- Testify at the Planning Commission Public Hearing
- Email to: planning@cityoftacoma.org
- Mail to: Planning Commission, 747 Market Street, Room 349, Tacoma WA 98402

*NOTE: All comments provided to staff during the Open Houses will be considered as part of the public testimony for this comment period.
May 1, 2019

Elma Borbe
Sound Transit
401 South Jackson Street
Seattle, WA 98104

RE: Tacoma Dome Link Extension – Scoping Comments

Dear Ms. Borbe:

Development of the Tacoma Dome Link Extension (TDLE) is a landmark investment for Tacoma and for the Puget Sound region. Communities in the South Sound have been waiting for completion of the LINK “Central Spine” since before ST2. This project will finally connect that spine to the second largest city in the Puget Sound and with the comprehensive web of transportation options that weave the South Sound together and with destinations far beyond.

In recognition of the importance and the City of Tacoma’s role in the successful delivery of the project, we offer the following comments for your consideration during the project’s Environmental Impact Statement (EIS) process.

The City Council is expected to take legislative action in late May or early June 2019 to forward its comments and recommendations to the Elected Leadership Group and the Sound Transit Board. In anticipation and support of the policy-level action of the City Council, which will include specific recommendations on station options that should move forward, our comments are mainly focused on technical issues that should be studied in the EIS process, representing the concerns and suggestions of City staff, as well as community, commission and Council input. In addition, we are also highlighting some of the City’s core values we believe are essential to shaping the TDLE project in a manner that will maximize its potential for connecting our region. Comments are numbered for easy reference and not listed in any particular order of importance.

A. Core Values

1. Destination City – Tacoma is the second largest city in the Puget Sound Region. It is recognized as a Metropolitan City in the Puget Sound Regional Council’s Vision 2040 regional growth strategy, which is the top-tier of its regional designations and an area responsible for absorbing a major share of the population and employment growth of the region. The Dome District is within the City’s Downtown Regional Growth Center, which is designated both locally and regionally as a focus for growth and a major destination within the region. For example, the Tacoma Dome is the largest indoor venue in the state of Washington. In 2017, eight of the top 25 North American tours and five of the top 25 worldwide tours played the Dome. The draw of the Tacoma Dome is just one example, but it alone demonstrates Tacoma’s unique status along the TDLE corridor. As a destination for the region, the state and, in fact, world, we would miss the mark if we did not develop the TDLE in a way that supports the visitor or commuter in feeling that they have arrived at a “place”, versus simply passing
through. We would like to work with Sound Transit in consciously exploring, designing and incorporating elements that achieve this sense of destination and place.

2. **Equity** – The Equity and Empowerment Framework, adopted by the City Council in 2014, makes equity a consistent guiding principle across City services and policies. Equitable service delivery to residents and visitors is a chief goal of the framework. Equity is also one of the core values identified in *Tacoma 2025*, the City’s Ten-Year Citywide Strategic Plan and Vision adopted by the City Council in 2015. The City supports equitable access to transit and improved access to job centers, consumer amenities and public services. We are aware that Sound Transit is also committed to equity in its service delivery – including maximizing transportation affordability and targeting investment in underserved communities to improve access. We are not only committed, but obligated, to use an equity lens in the development of the TOLE to ensure that its benefits are available to and reach a diversity of populations in our community.

3. **Economic Development** – The City of Tacoma is recognized and expected to serve as a Regional Growth Center for the healthy and sustainable growth of the Puget Sound. In responding to the many challenges and opportunities associated with such growth, the City and the community have consciously made “Economic Vibrancy and Employment” one of our strategic focus areas, as specifically called out in *Tacoma 2025*. We value the light rail extension as a complement and catalyst for economic development. We support Sound Transit’s consideration of economic development as a critical factor and ensuring station locations and the connections between those locations support and promote the economic vitality of our region and City.

4. **Connections** – The vision of Tacoma’s Transportation Master Plan (TMP), an element of the *One Tacoma* Comprehensive Plan, is a sustainable community with many residents, businesses and visitors who have various transportation needs and priorities. The City is strategic in how it plans its transportation system with an emphasis on carrying the people and goods that foster Tacoma’s culture, character, and competitiveness. The transportation system offers multimodal travel options that provide safe access for all users and neighborhoods, encourage healthy living and protect the environment. The TOLE will, without doubt, become a major connection in this vision and, as such, must be consistent with the TMP and the *One Tacoma Plan*.

5. **Urban Fabric** – Transit is recognized today as more than transportation. We look to major cities across our nation for examples of how transit has contributed to and is an integral component of communities that are a tight weave of housing, jobs, entertainment, recreation, services and other qualities of life. We envision the TOLE as a major contributor to that fabric in our community, particularly in the Tacoma Dome Station area where transit-oriented development is occurring at an unprecedented pace. We have a vision for the Dome District as a Transit-Oriented Development hub and a growing, regional Entertainment District (*Tacoma 2025, One Tacoma Plan, South Downtown Subarea Plan*). It is important that the Dome District be viewed as a dense, mixed-use urban area with destination entertainment venues and a high potential for housing development rather than solely as a transit corridor/hub. As indicated previously, the City continues to have concerns about the aesthetic, noise, development and economic impacts associated with a fully elevated corridor, particularly as it travels into Tacoma’s Downtown – in this area in particular, these types of significant infrastructure investments must fit within the already well-established urban
fabric as this is not a place that can be redesigned around the infrastructure. In that vein, the “cut-and-cover” and the “over-the-Sounder” alternatives to the elevated stations and alignments as currently presented that were brought up by participants at Sound Transit’s community workshops, by City staff, and by the Mayor, represent design alternatives that could contribute to the urban fabric of our community and are worthy of further examination. If there are other design alternatives that similarly balance the needs for efficient, convenient transit service while supporting dense, transit-oriented development in a developed urban environment, they should also be explored. Sound Transit must underscore the importance of this factor – integration with and strengthening the existing and planned high-density urban environment – to frame the development of the TDLE.

6. **Multi-Jurisdictional Partnership** – “Partnerships” is also one of the core values and guiding principles identified in *Tacoma 2025*. We are committed to the continuous collaboration with Sound Transit and other jurisdictions and agencies involved in and affected by the TDLE project. In particular, the City applauds Sound Transit’s efforts to date and encourages continued close coordination with the Puyallup Tribe of Indians, one of our most significant partners. Additionally, the City of Tacoma, the Port of Tacoma, and the Puyallup Tribe have entered into a multi-jurisdictional partnership, along with the City of Fife and Pierce County, to develop a subarea plan for the Tideflats area. This plan will refine the land use and transportation assumptions for the areas surrounding the Tacoma Dome, East Tacoma and Fife Stations. We encourage Sound Transit to work closely with the City to account for this planning effort in the development of the TDLE project.

**B. Technical Issues**

Through the upcoming environmental review and project design phase, the following specific issues deserve in-depth analysis and special consideration:

1. **Safety**
   a. Transportation safety should be included as an evaluation criterion for all alternatives. The impact of any at-grade crossings, in particular, should be considered. The draft EIS should also describe the improvements which will be made to the roadway network to enhance safety.
   b. Analyze the potential for this infrastructure facility to create new opportunities for blight and undesirable or criminal activities, and potential Crime Prevention Through Environmental Design (CPTED) options and/or other mitigations that could reduce this potential.

2. **Equitable Access**
   a. Analyze the impacts on equitable access to job centers, consumer amenities and public services.
   b. Access to and from the new stations must be convenient and safe for all residents, employees and visitors. Both of Tacoma’s station locations will require significant analysis and consideration for access, including the proposed East Tacoma Station as it is separated from many of the surrounding destinations by existing infrastructure barriers (Interstate 5, Sounder corridor, etc.)
3. Development Potential
   a. The process must include evaluation of factors relative to how this transit investment can be developed in a manner that is most supportive of economic development, and particularly transit-oriented development, to include maximizing future development potential, avoiding the creation of remnant parcels, and avoiding impacts which may reduce practical or permissible future development due to building offsets, maintenance and constructability concerns, fire and life safety, or related issues.
   b. Analyze route, station locations, and design alternatives to identify options that maximize the potential for dense urban, mixed-use and entertainment developments and minimize the loss of property otherwise available for development, particularly in the Dome District.
   c. Ensure that the station design is integrated into a land use and transportation environment which is significantly denser than the current environment, particularly in the East Tacoma Station area.
   d. The environmental review process must include an examination of consistency with regional transportation and land use plans and the City's adopted policies and plans, including the One Tacoma Comprehensive Plan and some of its elements that are most relevant to the projects, such as the Transportation Master Plan and the South Downtown Subarea Plan.

4. Visual, Noise and Urban Design Impacts
   a. Analyze potential visual and urban design impacts, including impacts associated with shading, effects on trees and vegetation, the use and quality of urban public space, obstructing views (especially water views) from planned and future development, the potential for obscured store-fronts and increased signage costs, more difficult access, the potential to physically and psychologically “divide” these neighborhoods, and the potential to limit roadway operations and streetscape design flexibility over time.
   b. Analyze the possible noise and air pollution and evaluate design options and/or mitigations to eliminate or reduce such impacts.

5. Archaeological and Cultural Elements
   a. This corridor passes through areas in close proximity to known culturally significant areas, archaeological sites and designated historic structures, as well as areas that are considered to have a high probability of containing archaeological sites. The environmental review should include an in depth analysis of known elements, potential discoveries and impacts.

6. Street Networks
   a. For the East Tacoma Station, the community noted significant opportunity to reconfigure the existing City street network to enhance the safety and efficiency of access to the project. The City anticipates that some of these reconfigurations may be necessary to adequately provide access to the East Tacoma Station, and that some preliminary design may be required to adequately evaluate the strategies for providing traffic circulation to and from the station.
   b. In the East Tacoma Station area, analyze the impacts to traffic flow on the Portland Avenue corridor, including the impact on freight transportation.
c. The Transportation Master Plan designates Portland Avenue as a corridor which is important to many modes of transportation, including high-capacity transit and bicycling. Please ensure that the environmental analysis addresses how the alternatives will support the goals in the City’s One Tacoma Comprehensive Planning documents. The analysis should address how the designs will integrate with the planned modal priorities along Portland Avenue, including how the proposed station will facilitate connections to future high-capacity transit service and how the station location and design will facilitate connections to the surrounding community via active modes of transportation.

d. The community workshops identified a need to make enhancements in the vicinity of the East Tacoma Station to address the current lack of active transportation facilities. A representative example is the need to improve connections from the proposed station locations to the community which will be most served by the new station, which is on the opposite side of Interstate 5, and the idea that a new pedestrian bridge from the station area to the casino area could address some of this need. The environmental analysis should discuss how the station will integrate with active transportation facilities on Puyallup Avenue, Bay Street, Portland Avenue, L Street, and a potential new bridge over Interstate 5.

e. We encourage Sound Transit to adopt a design timeline which accounts for the active participation in the upcoming planning exercises associated with the Tideflats Subarea Plan to re-configure the transportation network and re-imagine land uses around the East Tacoma Station. There may also be significant opportunities for partnership between the City, Port of Tacoma, Sound Transit, Puyallup Tribe and others to work together to re-envision this particular area so that it best capitalizes on this significant investment while meeting the needs of so many different stakeholders.

7. Multimodal Connections

a. Evaluation of the alternatives, and the location and design of the stations, should place paramount importance on the connections to other modes. Stations should explicitly accommodate, at a minimum, the following transportation choices: transportation network companies, taxis, charter buses, and other for hire vehicles; pedestrians; bicyclists; dockless bike and scooter share; vanpool and carshare; private shuttles; and local and regional bus transit.

b. Evaluate traffic circulation to and from the station, including both the surface network serving the station and the loading and parking areas at the station. Management of each trip type—parking, bus, shuttle, taxi, transportation network company, and private curbside service, for instance—should be included in the analysis, including the expected strategies for storing and segregating those trips within the station area. The evaluation should also discuss how the station design will accommodate future flexibility in design to accommodate shifting demand for different modes.

c. Evaluate the potential impacts of the new station and improvements on the planned modal priorities in the Transportation Master Plan, which shows the key networks for each mode.

d. The transportation and access evaluation will need to account for large events because of the significant, regional entertainment venues located in these stations areas, including the Tacoma Dome and the new Puyallup Tribal Casino.
8. Pedestrian and Bicycle Connections
   a. The analysis should include the degree to which pedestrian access to the new service, and the pedestrian cross-connections to existing services such as Sounder and Tacoma LINK, are separated from other modes. The safety of each connection should be assessed in the environmental documents. For the Tacoma Dome Station, the analysis should consider the extent to which off-street connections can be made directly to other modes of transportation around the area. Safe connections which do not rely solely on the existing connections within the right-of-way will reduce interactions with at-grade rail crossings, intersections, and other potential conflicts.
   b. The City’s One Tacoma Comprehensive Plan establishes a modal hierarchy which places pedestrians at the highest priority. Pedestrians are assumed to be a priority on every street. The City also views strong pedestrian access as essential to the long-term success of the TDLE. The ease and convenience of active transportation connections should be included as part of the environmental analysis, including whether or not the pedestrian routes are protected from the elements, grade changes, walkway and bikeway widths, bicycle accommodations at stations, running slopes, and the directness and distance of routes.
   c. During the community workshops, several stakeholders mentioned the concept of modifying station locations so that pedestrian access points can be provided on opposite sides of busy streets. This concept would reduce the number of at-grade pedestrian crossings, and should be a design alternative evaluated in the environmental analysis.
   d. Analyze the station locations for best pedestrian connections to job centers and consumer amenities such as shops and entertainment venues, as well as most convenient linkages between transit for tourists and travelers.
   e. Necessary positive outcomes of any transit project must include enhanced personal safety, strong pedestrian and bicycle connections to the rest of downtown and urban amenities such as on street parking in front of shops, walkability and placemaking.

9. Parking
   a. Consider parking impacts along the entire transit system (Tacoma LINK, Pierce Transit). The current concept for the East Tacoma Station does not include any associated parking. While the Tacoma Dome Station has the potential to have some of the best multimodal connections in the region, the East Tacoma Station area is not expected to have the same opportunities. The environmental analysis should discuss how people will travel to and from the East Tacoma Station. If parking is provided, the analysis should discuss how the parking will be managed (e.g., by using congestion pricing and/or providing competitive pricing for vanpools) to help maximize ridership and help the City achieve its mobility, safety, and mode split goals.

10. Construction and Operation Impacts
    a. The impacts of the operation and construction of the alternatives should be included, including impacts to existing businesses and impacts to existing transportation; particularly transit services operating at Tacoma Dome Station.
b. Construction of this system will necessitate modifications to existing utility, transportation and other infrastructure. These impacts need to be fully assessed during the environmental review process to ensure the project can be implemented in a way that ensures the continued operation and integration of these other critical facilities.

11. Future Extension
a. The City’s Transportation Master Plan envisions the future extension of Central LINK to the Tacoma Mall Area. This future extension is also incorporated into Sound Transit’s long-range plan, and funding for study of this extension was included in the ST3 package. The draft EIS should address the future feasibility of this extension, at least as it relates to station location and design alternatives.

12. Project Delivery
a. Recognizing the increasing transportation demand of the region, we encourage Sound Transit to explore alternatives which would allow advanced delivery of the project. The evaluation should assess how different alternatives may encourage or discourage the timely completion of the project, including impacts to the feasibility of funding, permitting, or constructability.

Thank you for the opportunity to comment. The City of Tacoma looks forward to our continued partnership on this very exciting project. We believe these types of high-capacity connections are absolutely key to providing the full menu of transportation alternatives necessary to meeting the needs of the region and our growing population in a more sustainable and resilient way. We are committed to continuing to work closely with Sound Transit through the environmental review and project design process to ensure the successful and timely delivery of the TDLE project.

Sincerely,

[Signature]

Elizabeth A. Pauli
City Manager

cc: Mayor Victoria Woodards and Members of the Tacoma City Council
Jackie Flowers, Director, Tacoma Public Utilities
Peter Huffman, Director, Tacoma Planning & Development Services Department
Kurtis D. Kingsolver, P.E., Director, Tacoma Public Works Department
Jeff Robinson, Director, Tacoma Community & Economic Development Department
Brian Boudet, Planning Division Manager, Planning & Development Services Department
Alisa O’Hanlon, Tacoma Government Relations Office
April 25, 2019

Sound Transit
Elma Borbe
401 S. Jackson Street
Seattle, WA 98104

Dear Elma,

Thank you for the opportunity to comment during the Tacoma Dome Link Extension (TDLE) Environmental Impact Statement scoping period.

The Sustainable Tacoma Commission is appointed by Tacoma City Council, and is tasked with ensuring the City's commitment to the locally adopted Environmental Action Plan. Critical to that plan is a goal to reduce greenhouse gas emissions by 40% from 1990 levels by 2020 and by 80% from 1990 levels by 2050.

The STC believes that TDLE light rail alignments and station locations should be evaluated for:

1. Potential impact to the climate via greenhouse gas emissions from operations and passenger access, and
2. Potential impacts due to climate change on built infrastructure for light rail.

While Sound Transit has committed to operate Link light rail from renewable energy sources, the mode split of how passengers will access regional light rail stations is an externality that should be addressed when evaluating station placement and design alternatives. Per-passenger carbon impact of station access should also be measured in the 2030 timeframe. The STC strongly believes that all cost-effective measures should be taken to enable seamless integration between high capacity transit modes (Bus Rapid Transit, Link Light Rail, and Tacoma Link), local bus, and non-motorized modes such as biking and walking. This arrangement will reduce air pollution and congestion, maximize ridership, enable convenient transfers between modes, and make the most use of these public investments.

To that end we encourage further study of the TD2 and TD4 East In-Street stations at Tacoma Dome Station and the ET3A/B stations in East Tacoma to support either a 25th Street or 26th Street terminus option at Tacoma Dome.

Given the proximity to Commencement Bay and the Puyallup River, the STC believes that Sound Transit should consider the results of the Washington Climate Impacts Group study regarding regional sea level rise (Source: http://www.wacoastalnetwork.com/wcrp-documents.html). We request that Sound Transit take this information into account to ensure that project infrastructure can be constructed without geological or hydrological complications, enabling a 2030 delivery date for light rail service, and to secure a reasonable cost of keeping the light rail system in a good state of repair.

We look forward to seeing the results of Sound Transit's Level 3 Analysis in the coming months and for additional opportunities to comment on the EIS process.
Respectfully,


Lexi Brewer, Co-Chair, Sustainable Tacoma Commission
Chris Karnes, Co-Chair, Sustainable Tacoma Commission

CC: Mayor Victoria Woodards
    Tacoma City Council Members
    Elizabeth Pauli, City Manager
    Michael P. Slevin III, Director, Environmental Services Department
    James Parvey, Division Manager, Office of Environmental Policy and Sustainability
    Kristin Lynett, Office of Environmental Policy and Sustainability, Sustainable Tacoma Commission
    Alisa O’Hanlon, Government Relations Department
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    Lihuang Wung, Planning & Development Services Department, Tacoma Planning Commission
    Lexi Brewer, Co-Chair, Sustainable Tacoma Commission
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    Sagar Ramachandra, Sound Transit