Good afternoon Councilmember Ushka,

I hope all is well with you.

As the time passes, I have become increasingly concerned that the City of Tacoma may give into certain pressures and fumble one of the finest opportunities this city has had in a generation: to reform its anachronistic and exclusionary zoning code through the Home in Tacoma proposal.

Cities across the country are seeking to relax their zoning code to achieve a similar set of goals, of which you are very familiar. Fascinatingly, the opposition is all the same: the changes are too big, too fast; not enough studies have been conducted; I do not want a “high-rise” building next to my house; you will ruin my views; we need better infrastructure first, and; we are not the racist people who installed these Codes and therefore have no guilt in perpetuating them, etc. The last point will forever be a touchy subject amongst those invested in our current practices. Regardless, we can connect by string the land-use patterns of today with the regulatory codes of yesterday, along with the real estate and financial practices that prevented so many Tacomans the opportunity to grow their personal and generational wealth through property ownership.

That leads me to the piece in today’s Tacoma News Tribune by Kirk Kirkland and Brett M. Johnson. The fact that publishing this article made sense for these Audubon Society and Sierra Club-members leaves me disappointed that the reforms your council will advance, if at all, will not be worthy of the moment or the effort.

Packaged in an article that presents itself as “laying out the facts” are the same tropes that have already been put forward to dismantle key components of the Home in Tacoma proposal. I will strive and fail to be brief, but I want to parse the article a bit to identify flaws in its argumentation.

One, related to consensus or strong majority support, in the previous mayoral election only 35,276 votes were cast for a most critical race, or 27% of eligible voters. The low voter turnout resulted in a 55/45 split, and it raises the following questions: what is a consensus in this city and how would it be measured? Especially as this policy item is not put to a vote, why is consensus a factor in a divisive issue that is destined to never achieve it? Consensus should not come at the expense of doing what is right, and a prime justification for Home in Tacoma is the proliferation of such reforms throughout the region and county. These zoning reforms are being introduced out of necessity.

Two, it is agreed that Tacoma must do what it can to avoid the substantial displacement of residents. However, such displacement must already be occurring under our SFR-zoning with the rise of real estate pressures and price. Additionally, this manner of zoning has prevented the construction of affordable housing in earlier decades which could have provided options for relocation to another Tacoma neighborhood. Instead of a new dwelling in a neighborhood that affords a suite of urban benefits, many are being pushed to unincorporated Pierce County, which continues to sprawl horizontally into the
wilderness. It is well understood that SFR zoning in cities has been a leading contributor to a lack of affordable housing construction in cities, and to list that concern as a reason to not relax exclusionary zoning practices is deeply ironic.

Three, displacement can be reduced by lowering the cost of real estate. Vast tracts of SFR land in the urban zones of this city, in a high-pressure real estate environment, naturally result in higher costs to construct and maintain structures, and result in higher taxation. The resolution to the problem, in the thousands of years of human urban development, is to subdivide properties and allow for denser types of construction.

You, specifically, have made mention of the implementation of certain design standards for new construction in this city, which is an admirable goal. It leads me to reflect on the new urban construction in cities in the Midwest, frequently clad in limestone and dressed in Classical styles, which are beautiful, and leaves me longing for such architectural qualities here. However, cities in the Midwest are not experiencing the real estate pressures that Tacoma is now confronting, or Seattle for that matter. Creating new construction that is appealing to the masses while also not busting budgets is a difficult task when the real estate purchase itself is an extraordinary budgetary expense. Design standards falter or disappear entirely when the land itself is extremely valuable for new dwellings, when people will pay anything to live there, and when profits are eliminated by the design improvements relative to the cost of land. I agree that many new structures are not particularly attractive here, but they also house new dwellings, are upending decades of urban stagnation, and at least feature some basic urban forms that render them acceptable. The eras of gorgeous Victorian fretwork or later craftsman homes are not to return.

Four, an environmental assessment is used to review the impacts of a site-specific project and are a terrific tool to evaluate the consequences of said project. The development of a city in its entirety, however, is not a suitable subject for review under an environmental assessment. Long-term planning is the proper tool for the development of a city. Indeed, the very concept of an environmental assessment for a zoning code revision is silly on its face: were other code revisions provided such a review? How does the piecemeal and incremental development of a city get an environmental assessment? How would the impacts of unknown residential development even be credibly assessed? Could the determination of such a review be that an increased residential population in a city be bad for the environment, despite the inarguable truth that walkable cities are better for the environment? The idea is absurd, and yet Mr. Kirkland and Mr. Johnson are suggesting in print, without a hint of skepticism, that such an assessment is a logical path forward before we can allow rowhomes and duplexes in areas near a bus line.

Five, infrastructure improvements are not a reason to halt the Home in Tacoma proposal, even though it is constantly paraded as a key reason to do so. As a sewer and stormwater civil engineer (with an urban planning academic background), I understand that public infrastructure is improved in an incremental manner when demand necessitates it. Yes, sewer systems and other infrastructure will need to be improved, but that is the case regardless as these systems age and fail. The upsizing of critical sewer or storm lines can happen when their systems are scheduled for repair, or when a certain project requires it. To that point, the City already has tools in place to improve infrastructure, from the city’s Capital Facilities Plan and associated budget (and similar plans and funding sources), utility local improvement districts, and, of course, the private financing of developers who can partially or wholly fund these improvements.

Mr. Kirkland and Mr. Johnson state unequivocally, in a surefire nod to the loudest critics
of Home in Tacoma, that the North End sewer system must be expanded as it is at capacity now, per the previously unknown Washington Environmental Council. Curiously, a review of the private non-profit’s website produced no such documentation related to the North End sewer system, as far as I can tell. It is possible that intense rainfall can produce scenarios where wastewater is discharged untreated into Commencement Bay or elsewhere, but the city’s own sewer Capital Facilities Plan, 2021-2026, states that the Central and North End treatment plants “and the capacity of the overall collection system is sufficient to meet the anticipated demand for the next six yours or more”. That is seemingly a direct contradiction of the Washington Environmental Council’s apparent determination. Of course, again, that is a private organization with their own goals and agenda.

What is often unmentioned with regards to infrastructure is the opportunity cost of not better utilizing our existing infrastructure systems, and that new development most often works to pay for their improvements. We have empty sidewalks and roadways, and emptier bus lines. We have multi-billion-dollar rail investments that may have restricted residential growth potential around it, as well as hundred-million-dollar transit investments with similar issues. I am being requested by the City to repave my 1907-stamped sidewalk, and that would certainly be easier to do if I could share such an expense with other dwelling owners on a newly subdivided parcel of rowhomes. Of course, that is presently illegal, despite the fact that the #42 bus line stop is visible from my porch, and the McKinley neighborhood center is a five-minute walk away.

Six, the City of Seattle—the economic and cultural powerhouse of our region—grew by 100,000 people in the past ten years. Without question, the City of Tacoma will never experience such a period of intense population growth. Tacoma, at its loftiest, would welcome but a fraction of that over ten years. This matters because such fractional growth over a ten-year period can certainly be accommodated within Tacoma, and do so without terribly stressing the infrastructure of our city. This is especially the case if all the new growth is not just funneled into specific “arteries”, as proposed by Kirkland and Johnson. Indeed, the broad relaxation of zoning restrictions throughout the city is one of the better tools we have to avoid the stressing of our existing infrastructure systems, and conversely their better utilization. To advocate for artery-specific development, or phased development, is to endorse the model Seattle has struggled with recently: they have not rezoned the nearly 80% of SFR-zoning and instead funneled their new growth into up-zoned urban centers. This has hyper-developed and quickly transformed specific areas of the city into very expensive urban pockets, while also doing nothing to reduce the overall expense of living and developing in Seattle. Arterial, phased growth in Seattle has resulted in the shocking transformations of scale and price that we would do well to avoid.

Seven, and finally, with this being unrelated to the article, the determination of any new design standards does not need to be daunting. I have provided a link to Chicago’s zoning code for its beautiful mid-scale residential sections, which feature mainly form regulations, but also a couple of design guidelines. The focus of form over design will be critical for the development of Tacoma as an attractive place. Although it is frequently controversial, height restrictions actually matter much less than the strict regulation of the width of structures. The regulation of appalling width, or “landscrapers”, very rarely gets the attention it deserves by local planning bodies.

Thank you for taking all of this time to read my letter and thoughts. Linked below are sources and articles detailing similar zoning reform efforts across the country, as well as zoning codes that are today constructing beautiful neighborhoods that we would do well
to emulate.

Respectfully,

Troy Serad

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https://www.thenewstribune.com/opinion/article253629253.html
https://www.sightline.org/2021/08/01/we-ran-the-rent-numbers-on-portlands-7-newly-legal-home-options/
https://codelibrary.amlegal.com/codes/chicago/latest/chicago_il/0-0-0-2528122
https://www.strongtowns.org/journal/2018/10/31/we-regulate-the-wrong-things
https://www.strongtowns.org/journal/2020/7/21/is-this-development-out-of-scale
Hi Chris,

Thanks, as always, for your quick response. My (this) reply is not as a neighborhood board member, but my own thoughts regarding items still not being addressed.

The first point of the STNC board’s letter was a request for better transparency and inclusion. As mentioned in the letter, although the S. 82nd and Pacific Avenue site isn’t within my Neighborhood Council District, it is within City District 5 (which is partly in my NCD) and the Hosmer Street hotel site also overlaps/affects my neighborhood police sector. Impacts to communities don't stop at map lines, of course, which is why broader communication is needed and earlier communication has been repeatedly requested.

As also mentioned, we are well aware of the other sites throughout the city; however, the ones proposed in South Tacoma / South End are all longer-term. I'm not saying long-term isn't necessarily either good/bad or right/wrong, but it does warrant acknowledgment of the difference instead of being glossed-over, as well as the unbalanced concentration to the South at this time (including S. 66th and Proctor which is in my NC, and again in City District 5), and especially the very valid question about health and safety concerns at sites in highly polluted and high-crime areas.

SNTC did reach-out to SENCO (the letter you attached was part of that correspondence) and I especially appreciate your additional attached metrics which indicate 48% of the people interviewed prefer shelter options in the Port of Tacoma area (more than either East or South, combined); so if the goal is to house people in their preferred current locals, does that mean encampments along Yakima Street and near Interstate 705 are not going to be relocated to South Tacoma and/or South End, after all?

Lastly, what we are supporting is permeant, free and/or truly affordable housing for homeless and low-income people, which I believe would be much more beneficial and even more cost-effective than the millions of dollars being quoted for a few years of TEMS and Mitigation sites.

Clearly this is a challenging problem, needing both immediate and long-range solutions, but residents are feeling unheard and deserve to be part of the conversation much earlier than is presently happening.

Thanks for your time,
Heidi Stephens
From: Beale, Chris <chris.beale@cityoftacoma.org>
Sent: Tuesday, August 10, 2021 1:47 PM
To: Chelsea Nichole <chelseanichole253@yahoo.com>
Cc: Woodards, Victoria <victoria.woodards@cityoftacoma.org>; Stewart, Linda <lstewart@cityoftacoma.org>; STNC Board <board@southtacoma.us>; SENCo <senco253@gmail.com>; Ushka, Catherine <cushka@cityoftacoma.org>
Subject: Re: Equity of Proposed TPU Homeless Mitigation Sites

Thank you Chelsea. I don’t disagree that we need to better understand how the equity index is weighted. That said this is an emergency and NCS has been asked to look at every available site. I know that NCS staff is looking into a location in NE Tacoma as well, we have opened a temp winter site in NE Tacoma and we are co-operating a faith based TEMS site in the north end, a TEMS site on the east side and our stability site on the tide-flats. I do believe that we should understand why a site like the Cushman Substation is not being more seriously considered by the utility board.

One other item I wanted to pass along is a report from Metro Development Council - see attached. Almost 30% of folks interviewed in that report said that they would prefer a encampment location in Eastside or South Tacoma (which in this report would include south end and South Tacoma as a generalized area). I just wanted to provide this as background as to preference of where people experiencing homelessness have a stated preference for location. We also are trying to meet people where they are; not to say I disagree with the dispersed model, I just read this as a perhaps a reflection of where people are at..

Last thing. I am CC’ing SENCo Board to your communication. I believe they asked to coordinate with the STNC Board on this issue previously (see attached). District 5 is a very broad area, including three different neighborhood council areas. This 82nd and Pacific Ave site being the first location being under consideration that I am aware of in the South End Neighborhood Council area.

Gratefully in service,
Chris Beale, AICP
Tacoma City Councilmember, District 5
253.312.0550 (text or call)

Have a question or need city services? Use 311!
—> Tacoma First 311 - https://www.cityoftacoma.org/cms/One.aspx?portalId=169&pagId=17887
—> Download the “Tacoma First311” app through iPhone or Android
—> Dial “311” on any phone in city limits (dial (253) 591-5000 anywhere else)

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On Aug 10, 2021, at 9:35 AM, Chelsea Nichole <chelseanichole253@yahoo.com> wrote:

Please see the attached letter from the South Tacoma Neighborhood Council, regarding the low-barrier site proposed at South 82nd and
Pacific Avenue.

Sent on behalf of the South Tacoma Neighborhood Council.

Best,
Chelsea McElroy - Vice Chair
<STNC TPU Sites 08AUG21.pdf>
Hello

My name is Angelique Kitchen I am an investor in the Tacoma area my upcoming project address is 1919 E 37th St. We have over 3.6 acres there in an opportunity zone.

Our hopes is that we can bring affordable housing to the area by creating two & three plex townhome style under the Home of Tacoma. I look forward in hearing more about this opportunity.

The City council allowing this would be a great asset for Tacoma. We are excited and looking forward to creating more housing in the Tacoma area.

Thank you