South Downtown Subarea Plan Scoping

Index of Comments

Transcript from EIS Public Scoping Meeting – Thursday, December 15, 2011

Comments from Individuals
- Thomas Ebenhoh, 1/04/12 Email
- Jori Adkins, 1/09/12 and 9/26/11 Emails
- Rick Semple, 10/19/11 Email
- Steve Pilcher, 11/22/11 and 12/21/11 Email
- Lynn Di Nino, 12/28/11 Email
- Jill Barkley, 12/01/11 Email
- Cheryl Miller, 1/10/12 Email
- Franklin Clinton, 1/06/12 Email
- Jill Barkley, 12/01/11 and 12/16/11 Emails
- Mike Tartaglia, 12/16/11 Email
- Lance Harris, 12/29/11 Email
- Sharon Winters, 1/08/12 Letter
- Gary Knudson, 1/05/12 Letter
- Bronnie and Arthur Miller, 1/07/12 Letter

Comments from Groups
- Hillside Development Council, 1/05/12 Letter
- Walk the Waterfront, 1/06/12 Email
- AIA Southwest Washington, 1/10/12 Letter
- Tacoma Catholic Worker, Letter
- Catholic Community Services, 1/10/12 Letter
- Puget Creek Restoration, 12/21/11 Letter
- Jobs With Justice, 1/10/12 Email
- Tacoma-Pierce County Chamber, 1/10/12 Letter
- Institute for Environmental Research and Education, 1/09/12 Letter
- Climate Solutions, 1/12/12 Email
- Historic Tacoma, 1/17/12 Letter

Comments from Agencies
- Pierce Transit, 1/04/12 Letter
- Department of Archaeology and Historic Preservation, 1/04/12 Letter
- Sustainable Tacoma Commission, 1/10/12 Letter
- United States Environmental Protection Agency, 1/10/10 Letter
- Washington State Department of Transportation, 1/10/12 Letter
- Tacoma-Pierce County Health Department, 1/09/12 Letter
EIS PUBLIC SCOPING MEETING:

SOUTH DOWNTOWN SUBAREA PLAN

CITY OF TACOMA UNIVERSITY OF WASHINGTON TACOMA

THURSDAY, DECEMBER 15, 2011
4:00 P.M. TO 7:00 P.M.

***

CARWEIFN AUDITORIUM - UNIVERSITY OF WASHINGTON TACOMA CAMPUS

KEYSTONE BUILDING (1900 COMMERCE STREET)

CITY OF TACOMA
RESPONSIBLE OFFICIAL: IAN S. MUNCE, J.D., AICP
ENVIRONMENTAL OFFICER
ASSOCIATE URBAN PLANNER
LONG-RANGE PLANNING DIVISION
COMMUNITY & ECONOMIC
DEVELOPMENT DEPARTMENT

REPORTED BY: CAROL LYNN FREDERICK, CCR
License No. 2406
ASSOCIATED INDEPENDENT REPORTERS
43802 24th Avenue Court East
Eatonville, Washington 98328
(253) 566-1542 ** independentreporters@msn.com
MR. MUNCE: Good afternoon, everyone. My name is Ian Munce. I'm an Associate Planner with the Community and Economic Development Department. You're here this evening, I assume, because you saw at some point this Public Notice saying this evening is an opportunity for you to provide oral testimony. Now, on December 1st, we had a community meeting in here. We had about 80 folks here and answered a lot of questions about the process and where we've been and where we're going.

If anyone has any sort of process questions, they're welcome to take a break and go out to the lobby and ask those process questions, but this evening we have a court reporter. We have Carol here this evening to take your oral comments. We will be taking written comments through January 10th so that opportunity will continue to be available.

The rule of procedure here this evening is that everyone will have 5 minutes to speak until everyone has had a chance to speak, and then if someone wants to come back to the microphone, they're welcome to do so. The microphone isn't on, but they're welcome to come back and say something more.

The way we set this hearing up is it's going to start at 4:00 but it's going to go until 7:00 so we
don't know who's going to come after 5:00 or after
6:00. We will be here and I will periodically update
this small presentation. The topic is a Subarea Plan
for South Downtown Tacoma. We're here to take your
testimony, and, at this point, I should have the
sign-in sheet to call on people in the order that they
signed in and someone is getting that for me now.

Are there any procedural questions people want to
raise about the hearing itself, this public testimony
session itself? Okay. Then we'll just wait for the
sign-in sheet. I didn't introduce the woman who
volunteered to get the sign-in sheet. Janet Arntz is
an Environmental Planner with the University of
Washington. She does all of the campus planning for
all of the campuses.

What we ask you to do is, since this microphone
isn't working, you can sort of look at the audience,
but we really want you to speak towards the court
reporter so that she can get your comments down
verbatim. I'll probably make a mess of some of the
names, but the first one seems pretty easy. He didn't
indicate if he wanted to testify, but the first name
is Brett Williams.

MR. WILLIAMS: No, I'm not going to
testify.
MR. MUNCE: Okay; thank you. So the first person then is Finley Young. Stand here, please, and the court reporter will get your remarks.

MR. YOUNG: My name is Finley Young. I'm here representing the United Food & Commercial Workers Local 367 of Tacoma.

AUDIENCE VOICE: We can't hear you.

MR. YOUNG: My name is Finley Young, and I represent the United Food & Commercial Workers Union Local 367 of Tacoma, the Retail Clerks, as they're commonly known. I'm here today because I was not invited. I understand from Ian that there was a list of some 1,800 names that were invited but I don't believe we were on it, and that's my first concern.

In fact, the concern of our union at this point in the City of Tacoma is to somehow bring about a process, a new thing in Tacoma, called "Transparency," a process that will allow our community groups of all different sizes, shapes and colors to enter into the process of the development of the City, not just by getting news of a project that has just been approved by the City Council like Venus emerging from the Sea on the half-shell, just a done deal, but rather to actually hear about a project and participate in the planning of a project and helping to bring it along.
We believe that a process such as this will allow the City to meet the standards in this Vision 2040 Plan, which does include from our selfish point of view labor standards and living wage jobs as part of the goal that, frankly, what I see from your materials here today is missing. It's a good thing, I suppose, for a developer to be able to just waltz into the Building Department and say, "Here's my project. Please give me my building permit," but I don't see in that process where he has to make any kind of showing that he will meet the standards of the Vision 2040.

Our answer to that, or at least our suggestion, would be that there be a process of notice to committee groups when a project is planned and that the City Council take a look and see if committee groups were given notice, a decent interval before, so that they can chime in their thoughts about the process, and, absent which, the project couldn't go forward.

Now, that sounds like a roadblock, but actually it isn't. If everybody is aware of the requirement to give notice to interested groups, then they can give that notice and still waltz in, I guess, and get their permit, providing that notice has been given, and the project would proceed. I'm not quite sure how that
would be done, but it seems to me that the City should be able to build transparency into the process one way or another. Thank you.

MR. MUNCE: Thank you for your comments.

Next is Steve Wells.

MR. WELLS: I am Steve Wells. I reside at 5316 North 45th Street in Tacoma, and I also own a business operating out of 705 Dock Street. It's Evergreen Rowing, and I'm an officer of a local rowing club, Foss Rowers. I would like to speak today, first of all, from the standpoint of my experience as the Director of the State's Growth Management Program from 1992 until 2004.

During that 12-year period, we worked very hard to make the Growth Management Act a very strong tool to be used to protect environmental quality in the State. Prior to the Growth Management Act, it's my opinion that most of the environmental legislation that we had was a very effective way of saying "No."

We wanted to make the Growth Management Act a very effective way of saying "Yes," and I applaud the City of Tacoma's efforts to put together a Subarea Plan and a Nonproject EIS that will make its implementation of growth management an effective way of saying "Yes."

When a project is brought to the City that
implements an Adopted Comprehensive Plan or a Subarea Plan and is consistent with the environmental review that has been done for that planning effort, then it's my feeling that those plans, those projects, should go to the front of the line. They should be expedited. We found when we looked at the way SEPA was being implemented in the State that we were asking people to answer the same questions over and over and over again. We found, for example, that every intersection had four corners. All four corners were being developed, and the developers of those four corners were paying for traffic analyses for the same intersection over and over and over again, and it was our feeling that that inefficient use of resources was not doing the environment any good.

I was told one time by John Hempelmann, a leading environmental attorney in the State, that we had since SEPA was adopted spent over a billion dollars doing SEPA analyses and that was in the late '90s, and you have to ask yourself what we got for that billion dollars. I'm sure there was a lot of good there, but we also got a lot of meaningless checklists that talked about ravens, crows and seagulls as affected birds, and that did me no good.

I believe that we should only have to answer
environmental protection questions once, not over and
over again. Hence, there are certainly some questions
that are best answered at the plan stage or the
Subarea Plan stage. A classic example of those are
cumulative effects. We can't properly assess
cumulative effects on the environment from the
standpoint of the building permit analysis, or at
least it's extremely difficult to do that, so there's
a whole set of questions that are best answered in the
context of a Subarea Plan, and I see the City of
Tacoma in this proposal attempting to do exactly that.

I also feel quite strongly, though, that there
are some questions for which you only have enough
data, enough understanding, of the project to be
answered at the project evaluation stage. While it's
ambitious for the City to say, "The Nonproject EIS
also eliminates the need for subsequent environmental
review," I wish you well in that endeavor. I hope you
can do that but I'm skeptical.

Now, from the standpoint of Foss Rower, we are
working diligently to support the Foss Waterway
Development authorities proposed development of
Waterway Park just south of the 21st Street Bridge and
in this Subarea Planning area. We eventually would
like to see secure small boat storage in the form of
each boathouse in Waterway Park. To the extent that we are rubbing our nickels together to implement this and we bring a project proposal to the City for environmental review and project approval and that is expedited by this Subarea Plan, we will be extremely grateful.

Thank you very much for taking this time, and I do sincerely wish you all of the best to answer all of the questions that need to be answered in the context of this Subarea Plan.

MR. MUNCE: Thank you. The next signature is Jake Carton.

MR. CARTON: Is it possible I could go a little later?

MR. MUNCE: Absolutely, but we're running out of people. A lot of people signed in and didn't sign up to testify. Ms. Pritchard, did you care to have a few words at this point, if I'm getting the name right?

MS. PRITCHARD: Thank you. I'm Lua Pritchard, Executive Director of Asia Pacific Culture Center, which is being proposed to the scene of Tacoma to be located at 21st, 22nd, 23rd, Fawcett Avenue and Tacoma Avenue, which is right in the very district, right next to this area, that you are discussing
today.

I just want to say we are excited to see this process going through and we are very excited to learn more and more that our customs will fit right in. That's all I want to say. Thank you, and we will be very happy to be involved if possible. Thank you.

MR. MUNCE: Thank you. Scott Hansen.

MR. HANSEN: Scott Hansen, Puget Creek Restoration Society. What I would like to start off with is that it looks like the Draft EIS is only available at the library or the City, and most of us don't have days and hours to sit down and go to the City or the library to read it. How do we get a hard copy draft of the EIS so we can read it?

Some of the comments and points of consideration that I would like to see in this Subarea Plan is the use of native Evergreen and other deciduous trees in landscaping, use of native shrubs and groundcover in all of the landscaping areas, use of low impact development projects, green roofs, rain gardens, pervious pavement and numerous other low impact development scenarios.

Those low impact development scenarios will help to filter the stormwater coming off of these sites, and stormwater that isn't filtered through low impact
development before it enters the bay, Thea Foss Waterway or wherever it goes into our natural system, it should be filtered stormwater.

How are you going to mitigate for the additional light and heat infrastructure coming off the buildings? In this area, there are a lot of vacant lots that I feel are going to be developed, and concrete roofs, heat coming off of those structures, changes the thermal climate. The amount of lights that is going into the sky also affects surrounding habitat areas for wildlife.

Also, you have a chance to incorporate garden roofs, container gardens, other things that I'm not sure if the Code in the City of Tacoma allows in balconies and roofs. That may be something else to think of. Right now that's all of the comments I can think of, and we will write up a formal letter and get it to the e-mail address. Thank you very much.

MR. MUNCE: Thank you very much.

Mr. Carton?

MR. CARTON: Do I lose my right to speak if I wait for a half hour?

MR. MUNCE: No, but if we don't have anyone else to testify, we'll just take a break until others arrive. We left it deliberately open. I was
expecting more folks to be here to fill out the time, 
but we will be here until 7:00 taking comments 
whenever people want to provide them and you're all 
welcome to stay, but we probably should just take a 
break until we have some testimony so we will just 
adjourn for 15 minutes and then see if we have some 
others, if there's no objection to that approach. 
Okay. We're adjourned until 4:40. Thank you. 
(Pause in proceeding.) 

MR. MUNCE: Good afternoon again, 
everyone. We are ready for the next round of 
comments. Anyone who is here who would like to speak 
just let some of us know because we have three I'm 
going to call on. Adam Hoyt is going to go first and 
then Bob Mirick and then, if he doesn't want to take 
another pass, Jake Carton. At this point, I'll call 
on Adam Hoyt. 

MR. HOYT: My name is Adam Hoyt. I'm 
with the Washington State Jobs with Justice, a 
community group. I have a brief statement. 

As of this late date in the City planning 
process, we have no confidence that the City has 
engaged communities that have been traditionally 
disconnected from developed decision making by 
developing new partnerships between these communities
to confront the environmental justice needs of marginalized and disadvantaged communities, nor do we have confidence that the City is complying with the spirit of the 2010 Washington State law that mandates expanded public participation for area-wide planning and mandates that the Subarea Plan act affirmatively to avoid displacement of existing residents and/or cultural groups. These are some of the commitments that the City made to HUD and the Puget Sound Regional Council when the City in writing accepted a half million dollar tax funded grant by Resolution 38227.

If the City is blocking civil participation in project by project decision making by using this 2010 law, then it should invest in engaging low income residents and workers marginalized disadvantaged communities, justice organizations, labor unions and religious groups at least as equally as it has the investor and business community over the last six months. This is the baseline mandate of Vision 2040 that the City embraced when accepting the grant. A preliminary investigation has determined that this is not the case.

At the recent last and final community outreach meeting prior to the formal downtown planning process started on December 5, City officials responded to our
concerns stating, "We are starting that outreach and having those conversations now." Selectively making a few 11th hour presentations, one on a Thanksgiving Saturday before the final community meeting and another last Thursday, is not meaningful engagement for low income communities in this hectic month.

The train has now left the station without the City delivering on its grant commitments and Resolution 38227. In less than one month, official comment closes to determine topics of study on the plan to radically transform downtown and residents may lose rights to contest the direction of the City's plan.

We ask that you bring the train back to the station and engage the community inclusively and meaningfully. Inclusive public engagement means also including groups such as labor unions, churches, civil rights groups and other justice organizations as well as those that have fought the City evictions of low income residents' homes and services in and near downtown and also helping form new partnerships between these groups by running workshops with us as the City did with the investors and business community and suspending the formal Land Use Planning process so that the rest of us can catch up and lend our voices.
Short of this step, the City, on January 10, will cut off the rights of the very communities the City claims to be engaging and preventing us to contest the publicly expressed bias of an unelected City official.

Thank you.

MR. MUNCE: Mr. Bob Mirick.

MR. MIRICK: Thank you so much. My name is Bob Mirick. I live at 6015 Pacific Avenue in Tacoma and I attended your last meeting. At that meeting, several things occurred to me. One is I wanted to make sure that the City's police station property was included in this district and I believe it is, and the other thing that I was concerned about was that we don't force the utility infrastructure to be put in until we have customers unless it's part of our normal day-to-day activity of restoring our water mains or our power facilities.

The reason that I'm concerned about that is I was somewhat involved with the University Place Town Center project, and, of course, that City is almost bankrupt now due to their hoping that they would have a customer and they did all of the infrastructure and they don't have a customer so they're in really bad shape. I would hate to see us force our utilities to do the infrastructure before we have actual customers.
The other aspect of that is when we did Freighthouse Square and the big, concrete parking garage, the idea at that time was all of the street and sidewalk infrastructure would not be disturbed and so we had painted sidewalks and crossings and all of that. We must have missed something huge along the way because within a year a great deal of that was harmed by Tacoma Water and others and the sewer guys for going in and doing what they were doing so the government had to redo those streets so it wasn't a very good use of our funds.

Another thing that happened down there was at the time we had a City Nonmotorist Committee and we had a partially blind member of that committee, and he took the builders and the committee on a walk of that area.

It was very difficult for ADA people to traverse that area so we had architects and engineers that were building it but they weren't all that familiar with ADA stuff, so I think it would be wise as this thing moves forward that we have actual ADA people review the plans for having ADA-type access with the future development of the project.

I think my last comment has to do with the idea that I would presume that we want to have places here where people can both live and work so that we reduce
our impact on the transportation systems. Of course, finally, I'm a trail guide so I want to make sure that the Prairie Line Trail is sort of the centerpiece of this construction the way that it connects to the esplanade and the way that it connects to the Scott Pierson Trail and our other major nonmotorized infrastructure. Thanks so much.

MR. MUNCE: Thank you. Anyone else?

MR. CARTON: Thank you for being patient with me. My name is Jacob Carton. I'm a community organizer with a group called "Jobs with Justice." I believe Adam explained a little bit about our organization earlier.

The City is planning to radically transform downtown by generating 30,000 new jobs and homes for 30,000 new residents by 2030. This could be a great thing. The City plans to study air quality, environmental health, land use, population and housing, transportation and circulation and parking, public services and others in this EIS process.

We are asking that the City integrate this study with a study of the 30,000 new jobs and 30,000 new residents. There should not be a disconnect between the environmental study and the whole reason why we're doing this or one of the major reasons why we're doing
this. At the last and final City community meeting before this formal process started on December 5th, the City presented a model of development that had taxpayers funding incentives for private developers but left the most important decisions about the 30,000 jobs entirely in the hands of these private developers.

This is the jobs and housing and development model that the City has used in the last few decades. This is the disconnect. 30,000 jobs, and what will they look like with the elephant in the room? The City needs to seek to study and to compare different models relating differently to all of the other caucuses in this EIS process. The jobs and development model that the City has used in the last few decades has not worked as well as it could have when we consider the EIS caucus such as air quality, environmental health, land use, population and housing, transportation, circulation and parking and public services.

Will the City measure and quantify the impact of the jobs lost from the City's two decades of development on these environmental caucuses? As members of this community, we know and see this impact. What is this impact that the City needs to
study? We see continued record unemployment in Downtown and surrounding communities. This nation is experiencing what this community has experienced for decades even during the Tacoma boom years, but even in the national bust years, you have to go to California to find higher unemployment rates than here. That's how far you have to go. There's been record unemployment in Downtown and the Hilltop for decades.

East Tacoma has the highest home foreclosure rate in the state. When Hilltop luxury condos push out low income residents to live in East Tacoma and then almost entire blocks of homes are shuttered in East Tacoma, the City is wrong to call this, quote, "Infill with lighted areas in the Hilltop." Jobs and environment are connected. It is poverty-wage workers who build those luxury homes on Thea Foss, who make those beds at the Marriott Hotel on Pacific and clean the toilets at Columbia Bank but have to use greenhouse gas commutes to Sumner to find affordable rental homes or chase the American Dream with Tacoma's busted high-risk mortgages in East Tacoma. Jobs and environment are connected.

It is undocumented, immigrant workers who clean Tacoma's toxic waste sites but have no meaningful whistleblower protections to protect themselves or
neighboring residents when the City is not only lax on environmental health enforcement but actively works with Federal Homeland Security to intimidate these workers into silence and to union busts in denying them a fair grievance process and so jobs and environment are connected.

It is the economy contributing union workers who the City is driving out of the downtown's shrinking population and economy because the City strategy has unconditionally let the Downtown grocery developer award a union buster with City taxpayer subsidies so jobs and the environment are connected there. It is barely middle class workers who now scramble to urban sprawled big-box discount stores to maintain their standard of living rather than living wage paying supermarkets. Jobs and environment are connected there.

Shuttered storefronts, large buildings halted in midconstruction, mega bankruptcy sales on the steps of the County-City Building, cuts to public safety and parking, staffing, miles of big-box discount store parking lots, exploding homeless, urban camping, vacant in backwoods urban villages like the Thea Foss are the ripples from a failed Downtown luxury village strategy and its connected low wage job strategy, a
strategy that made a bubble that contributed to the
national bubble that popped and made an environmental
mess in our backyard.

We have an opportunity through this EIS to learn
from the City's failed luxury model and compare it to
other more sustainable models that other Cities have
pioneered. These other more sustainable models share
the design of new jobs with community organizations
rather than elected governments and with private
developers. It's not only more environmentally and
economically sustainable, it's also more fair to the
majority of taxpayers since we, as taxpayers, are
investing so much. Thank you.

MR. MUNCE: Thank you. Anyone else to
testify or should we take another 15-minute break?
Hearing none, we will be adjourned until 5:10 on that
clock on the wall I'm pointing to. Thank you.

(Pause in proceeding.)

MR. MUNCE: Good afternoon again,
everyone. We're ready to start up again. We do have
at least one volunteer to speak, and if we have any
others, please tell one of us, one of the staff here,
and we'll sign you up if you're not signed up already.
The next speaker is Ms. Wilks.

MS. WILKS: Good evening. I'm a resident
of the McKinley District, which is just up the hill
from the district we're talking about, and I go
through it a lot commuting and so forth and I have a
few concerns I wanted to mention.

One is that I notice that on the list here you
have noise as one of your concerns. In particular,
I'm interested in the noise impact of the freeway and
what other things will be causing noise in the
district. It doesn't sound like it's going to be too
much of a problem, depending on what's there. We
recently cleared out McKinley Park of all the
invasives and it got really noisy, the neighborhood
there.

The other thing which is my main concern here is
that there has been a lot of talk about the Prairie
Line Trail. I live up near the edge of the gulch and
I'm wondering how well the Commission is planning to
hook up with other trail options that have been
mentioned to go up through the gulch because there's
quite an obstacle course to tread through if you're
going to get a bicycle path from the south end of
Pacific Avenue into the gulch. Thank you.

MR. MUNCE: Thank you. Any other
testimony at this time or we'll take another break?
Hearing none, we'll be adjourned until 5:30.
MR. MUNCe: Well, good afternoon, everyone. We are ready to get started again. We have two people signed up to speak, Jim Anderson and Max Spenceman.

MR. ANDERSON: Hi. I'm Jim Anderson. I'm the Director of Homeless Adult Services with Catholic Community Services. I oversee the Nativity House which is a program in this area but also the Hospitality Kitchen which is a program on the edge of this whole zone and Tacoma Avenue Shelter which is the largest men and women shelter for homeless individuals in Tacoma.

We serve about 5,000 people a year, which means that in the Downtown Tacoma area over the course of a year there are at least 5,000 people who are experiencing homelessness who have an impact on businesses and on neighborhoods, so what I'm looking at is in this discussion, and, actually, I think we are setting up some meetings to do this, that there is really attention paid to those people.

What happens if that doesn't happen is that they become visible and then suddenly pop up in the middle of a business development plan and it becomes adversarial, "What are those homeless people doing
here anyway? They're getting in the way," as opposed to realizing that those 5,000 people have been there for some time.

Year to date, there's been about 78,000 people in Pierce County who have timed out of unemployment. We anticipate that it will take three to six months for a percentage of them to become homeless as they work through all of their resources and lose family contact. There are 8,000 people already who have been cut off from what used to be Disability Lifeline which is the State disability plan for people who are unable to work.

We anticipate again about maybe two to three months before a large percentage of them become homeless so it's a serious number that can really have a negative impact on this whole plan, so what I'm really encouraging is that in this plan we really take a look at where people experiencing homelessness might gather and a plan for that, to look at travel routes that people may take and a plan for that, to look at the service providers that are really trying to respond to this situation and to really work collaboratively with us as we try to look at, again, all of those different kinds of factors.

How do we stabilize people? We have worked over
the last several years now trying to set it up so that
a person experiencing homelessness has someplace to go
seven days a week most of that time in direct response
to trying to deal with the issues that that creates
for neighbors. In this plan, what I really encourage
is that the social service agencies, especially those
dealing with people experiencing homelessness, are
seen as partners, collaborative partners, that are
working together.

I'm really excited about this plan. I'm really
excited about the process that we're going through and
so I want this to be a real collaborative process as
we look at those right now 5,000, and it could be more
than that, citizens of Tacoma who could either be seen
as a great hindrance to this or with proper planning
we can really look at ways to deal with this.

The final thing is that often it's, "You service
providers are creating homelessness in many ways,"
but, again, what has occurred over the last actually
20 years is a lack of affordable housing and a lack of
jobs, especially jobs that entry level people can get
into, mental health and chemical dependency issues and
the closing of units at Western State and chemical
dependency programs, again, the fact that 8,000 people
a month are timing out of unemployment, and the cuts
in Disability Lifeline.

There's just a whole range of factors that contribute to homelessness so we're here as partners to the community to respond to that and so we really want to be part of that conversation. Thank you.

MR. MUNCE: Thank you.

MR. SPENCEMAN: Good evening. Thanks for the opportunity to comment. My name is Max Spenceman. My wife and I are residents of the Subarea residing in the 1500 block south of Tacoma Avenue. I've got kind of four areas of comments that are included within your plan, I believe.

I would like to emphasize that adequate open space be provided for in the process. I often look at the Downtown area and the small acreage that we have devoted to parks. There are some that overlook the freeway but it's really very limited. For a World Class City, which at some point in time Tacoma will be, although that may be hard to imagine sometimes beyond our time, will there be space like a Wright's Park on the south side of Downtown, you know, a huge quadrant?

I'm not talking about some little neighborhood park but something that is suitable for student gatherings and for the occupied-type movements of the
future that will accommodate the gatherings that the
City of Tacoma might want to have or even concerts and
that sort of thing that are held in open areas,
especially with the distance we have with Mt. Rainier
off the hillside. The space is open now. It would
be, I believe, a shame to miss the opportunity to have
that ground stay open because of a failure to plan
for, I guess, very intense development as well as open
space beside that so that would be one point that I
would like to make.

The other is that it would be terrific if in the
planning surface water runoff could be accommodated.
We once were a very productive fishery. We still can
be. It just seems to me when you have a hillside that
obviously sheds water, that can be reincorporated into
our environment there for appreciation as well as for
the benefits of having fisheries or whatever.

The third concern has to do with structural
heights and height limitations on adjoining areas.
We've had the unpleasant experience of having a
condominium pop six stories up in front of a 1902
structure, and that change in view is very dramatic.
We went from having one great view to having 92 very
specific views into our neighbors' windows, but as the
development in this Subarea goes into the hillside, I
think there should be some compensation for existing
structures so the impact is not one of creating walls
to views and walls to the downhill area.

The fourth item would have to do with
user-friendly walkway developments so that we don't
get stuck with what we've developed already. Most of
us can do the north/south sidewalks. They're pretty
bad. I'm talking about east/west sidewalks. They
might even be better if they were stair steps rather
than a walkway, but diagonal walkways through these
areas. We can see that positive redevelopment with
the University area here because of the good fortune
of having railways run through and having had that
kind of incline, but the same is true for people. If
you really want to have a hill to walk and you enjoy
walking up and down the hills, that would be a good
planning thing.

The same is true also for roadway surfaces. I
know we don't always get snow, but when we do get
snow, if we don't have those diagonal old trolley line
railways, we're kind of icing ourselves out of being
able to safely get through Downtown so that needs to
be kept in mind. That's all. Thank you very much.

MR. MUNCE: Thank you. Anymore
testimony at this time before we take another break?
Okay. We will be adjourned until 6:00 clock. Thank you.

(Pause in proceeding.)

MR. MUNCE: Good afternoon again, everyone. We haven't had anyone else sign up to speak, and if no one here wants to speak, we will just adjourn for another half hour until 6:30 and then we will see if we have anyone show up in the interim, so, hearing nothing, we are adjourned until 6:30.

(Pause in proceeding.)

MR. MUNCE: Good evening, everyone.

This is going to be the last call for testimony. The three of us are going to stay here until 7:00 in case someone comes and we will take notes but our court reporter is going to be excused at this point so hearing no further comments, we are adjourned unless someone comes before 7:00. Thank you.

(Proceeding adjourned.)
Levy, Chelsea

From: Tom Ebenhoh [tomeben@yahoo.com]
Sent: Wednesday, January 04, 2012 7:48 AM
To: Levy, Chelsea
Subject: Input: South Downtown Subarea Plan & EIS
Attachments: South Downtown Subarea Plan-EIS Input.rtf

Chelsea: I was unable to make the meeting yesterday; however, attached is my input. I'll also drop it in the mail to Ian Munce.

Thanks again Chelsea for all the updates.

Thomas Ebenhoh

--- On Thu, 12/29/11, Levy, Chelsea <CLevy@ci.tacoma.wa.us> wrote:

From: Levy, Chelsea <CLevy@ci.tacoma.wa.us>
Subject: South Downtown Steering Committee Meeting next Tuesday
To: "Levy, Chelsea" <CLevy@ci.tacoma.wa.us>, "imunce@cityoftacoma.org" <imunce@cityoftacoma.org>
Date: Thursday, December 29, 2011, 2:35 PM

Hello South Downtown Steering Committee Members,

The next meeting of the South Downtown Subarea Plan & EIS Steering Committee is **next Tuesday, January 3, 2012.** We will be meeting from 9am to 11am at Sprague Pest Solutions (2725 Pacific Ave.; don't forget to allow yourself extra time to negotiate the **Sound Transit Sounder construction detours**, for directions call (253) 272-4400).

Here is the draft agenda for the meeting:

1. Adopt group charter and review proposed vision (see attached)
2. Presentation on future road projects in South Downtown
3. Discuss transportation-related priorities based on last month's presentations
4. Presentation on market conditions from Mike Hickey a broker with Neil Walter and Tom Kirkwood, a lender at Columbia Bank

The meeting notes from December's meeting as well as the draft vision statement are attached for your review. Following up on the presentation from Diane Wiatr at the last meeting, more information about the City's bike...
and pedestrian plan is available on the Mobility Master Plan website.

Happy New Year,

Chelsea

Chelsea Levy
Urban Planner
City of Tacoma
747 Market Street, Room 1036
Tacoma, WA 98402
P: (253) 591-5393
F: (253) 591-2002
clevy@cityoftacoma.org

www.cityoftacoma.org
What are the key elements that should be included in a plan for the South Downtown subarea?

Planning should focus on a mix of themes that will bring people and business to Tacoma.
1. **Entertainment/shopping.** For example, a shopping center in the Dome or Brewery District, similar to Seattle’s Westlake Center that will bring people into the City. The Lemay Car Museum is an excellent example of an entertainment venue to attract not just only local residents, but tourism to the City.
2. **Grow business.** Plans should bring businesses to the City; areas within the Dome or Brewery District appear prime locations. Tacoma has, but still lacks growth of business that will bring people into Tacoma, to work, live, shop, spend.
3. **Housing.** Providing adequate housing/condos, apartments in the development planning that will bring (and keep) people living in Tacoma. With development of business and a more sustainable and livable Tacoma, plans should keep people living in Tacoma, not just working, visiting, and leaving to homes outside of the City.
4. **Family.** Plan development that will attract families to visit, work, and live in Tacoma.
5. **Space.** Plans should not overdevelop; include green space for walking, biking, parks.
6. **Plans should connect the waterfront from the Tacoma Dome – Thea Foss – Pt. Defiance.**
7. **Plans should include responsible development along Thea Foss...and beyond.** A trip along Dock Street to Thea’s Park includes vacant, unused, and idle properties that could potentially be used to bring people to live, work, shop, and spend in Tacoma.
8. **UW:** Plans should include attracting more students to UW...learn, shop, live, spend.
9. **Convention Center:** Plans should include what can attract more use of the Convention Center. Again, to have a Tacoma that will attract people to come...and see Tacoma as the best choice in planning for Convention Center use.

**Do you have any concerns about the scoping process as described today?**
No; however, with the budget shortfall and financial issues facing Tacoma, concern is if the City can proceed as planned.

**Do you have any additional comments or questions?**
No.

**What is the best way for you to stay informed about this project?**
E-mail and updates on the City of Tacoma web site.

Thomas Ebenhoh
tomeben@yahoo.com
Great. Thank you. We will incorporate these comments into the scoping report.

Chelsea Levy  
Urban Planner  
City of Tacoma  
747 Market Street, Room 1036  
Tacoma, WA 98402  
P:(253) 591-5393  
F: (253) 591-2002  
clevy@cityoftacoma.org  
www.cityoftacoma.org

From: joriadkins@mac.com [mailto:joriadkins@mac.com]  
Sent: Monday, January 09, 2012 6:26 PM  
To: Levy, Chelsea; Boudet, Brian  
Subject: Fwd: Scoping for the BIG EIS

Hi, I wish there was more time (been gone too much) but I am just sending what I sent to keith and janice (see below)
Plus
- bldgs telling past history of area -
  1920’s Auto Row along Puyallup Ave.. there are probably 10 or 12 from Pacific Ave to G Street worth commenting on and at least documenting.
There are all the good things that need to be addressed when it comes to the Dome District and future densification such as
our access to open space and the water is superb
Existing connections to all transportation modes - car-free capability
The B Street Gulch and our commitment to cleaning up our storm water before it reaches the Foss
Our Zoning allows a great mix of residential, commercial, light industry, entertainment, small car related business and such to work together
the natural terrain sloping down toward the Foss allows for views and access or at least perceived advantages of being close to the water.

I guess that is all...
Oh, our hope is to build on the 221 Puyallup Ave. site one day and it will be a bigger building than one/two story.
It will be a housing project with retail/commercial on the first floor.
Thanks, Jori

Begin forwarded message:

From: rick semple <ricksemple@mac.com>  
Date: January 8, 2012 1:39:06 PM PST
HI Have either of you written or submitted anything for the scoping? Due Tues! Here are a few things I see as possible topics for scoping

- Massing or building size
  Tho I am for developing up, I think the ht. limit for the area around the Dome is excessive at 225'. This could create a huge wall, if not done right, around the Dome. I feel like the McKinley Neighborhood who I am sure isn't really involved in this, would have a few things to say about the height too...
  I also feel that building more large box buildings along the Foss is creating a wall around the water. We would like our buildings, 301, 309, 311 and 323 Puyallup Ave to be the first tier at the water so that you, Janice, can build with views to the water too.
  Which brings up another item - selling air rights.

- View Protection
  All the above could go under this heading too. plus under-grounding power lines...

- Circulation and traffic
  I hope we aren't going to keep harping on parking but move to circulation instead. That is where the big problem is - getting cars to existing lots and in and out or using public transportation. With the LeMay in, we are doubling the impact up there in that little area next to I-5 and yet the cars have to come thru the DD from all different directions to get there. We need a transportation circulation Plan!

- Environmental
  I love the idea of filling all the vacant lots and underutilized lots with buildings full of people living, working, eating, shopping and playing, but we need to deal with the stormwater run off of all this impervious surface we are creating and vehicles filling our roads. The B Street Gulch is the perfect type project to help mitigate this, but what else? We need a comprehensive Stormwater Plan.

- Noise and Light pollution
  I hope we can all agree that we are or would be living in an urban setting with trains within 600' of us in most directions to say nothing of garbage trucks and streetsweepers, so that we would not be asking to have noise reduction codes like 6th Ave and such. Personally I like the the sounds of the city...

- Trees
  Where do trees go in an EIS? After that little tirade by Forest German (by the way, thank you so much for the statement you made in support of urban trees, Keith) I realize there needs to be some written support for trees and what they can do for the urban situation. PLUS wider sidewalks, so that they have room to create the canopy needed to reach 30 ft. by 2030!

- LandUse
  Should we be looking at including the portion of the DD that is west of 705 in the UCX-TD Zone? We should compare the zoning with the residential/warehouse one that they have now which is the same as Brewery District. I know it should only be a certain distance from transit, so it wouldn't include the area where Cheers is or Sprague, I don't think.
  Do we need to tighten up our list of allowed uses in the DD? How did the detox hospital get as far as it did and should we be looking at the list for our UCX-TD zone?
I am sure I will think of more, but let me know what you think.

Jori
Levy, Chelsea

From: joriadkins@mac.com
Sent: Monday, September 26, 2011 5:06 PM
To: Levy, Chelsea
Cc: Janice McNeal; Stone Keith
Subject: I forgot to send list!

Chelsea,

Sorry about the delay in getting our list to you.

A List of Dome District Projects to work toward

B St. Gulch as open space, trail, and storm water retention system

Affordable Mixed Use everywhere, we are a TOD
   FH Sq.'s west lot (they have plans for this project)
   The McNeal's property on Puyallup Ave.
   The Storage Box property on Puyallup Ave.
   Other CORE vacant and/or underutilized lots

Multi-story parking structure for longterm Amtrak and commuters on Mattress Factory site with housing on top
   This replaces the one the 2009 DD Update shows in the center (CORE) of the District, we do not want cars driving to park in the center of the district. Should be a private/public partnership project

Tacoma Dome renovation for major league or just to make it better for music venues etc including 2nd story on SE lot to make up for parking lost in LeMay deal

Slip Ramps off 509 to D St.

FH Sq. - find and help a developer who will make atleast part of the building into a Granville Island/Chelsea or Quincy Market, the rest should hold Amtrak and other bigger businesses --- possibly go up to connect with Puyallup Tribe land on 26th

Maintain M-1 & M-2 for displaced small industry and manufacturing, promote it

Develop the leftover sites, after ST is finished with Sounder track, into mixed use/commercial

Bike route on Puyallup Ave. for commuters

Remove pedestrian buttons from intersection lights on Pacific, Puyallup Ave., D St., 25th and 26th

Underground power lines

C St. west sidewalk as swale connecting to PWD lot collecting storm water, curb bulbs, plantings

WaterWay Park - Boathouse and park with pathways, native plants

Create a LOOP trail from downtown across Murray Morgan Bridge, D St. and the Esplanade

Short term projects, just to get them on the list -
Finish permanent closure of A St. over tracks
Pick up properties to secure land for B St. Gulch

Of course, there is all that development LeMay wants up by their museum, see 2009 DD Update Plan, the LeMay Plan, but we were never part of that or have they ever talked to us about any of it.... sad

I am sure we'll come up with more once we really look at this list and our Plan
Hi Chelsea,
attached is the result of some of the research we did a couple of years ago;
Lots of links to other efforts in other places.
One of our favorite examples of cities modifying their code for "live/work" is Long Beach, CA...
attached...
Note that they updated in 2011 and the attached is from 2009...
Let us know if we can provide more.
We are very excited about getting our areas on the Arts Map as being ACTUALLY artist friendly.
Godd searching,
rick semples
Providing Artisan Live/Work in Existing Buildings

“Living in the back of the shop”

The term Live/Work as it is used by realtors, developers and others, for reuse of existing warehouse buildings as housing, is basically following the residential code which allows a home/office space in each unit. There is no Square Foot limit to the residential portion of the space, thus resulting in an exotic big space for a home with a price that matches.

We are interested in spaces that are more Work/Live. These would be spaces in commercial or industrial buildings where a person could also live. Limiting the Square Footage of living area and possibly requiring a City business license at that address may help insure the use as Artisan Work/Live, validating the relaxation of other building codes to hopefully keep the cost, and thus the rents, lower.

Thomas Dolan Architect with the Live/Work Institute says:

"In the interest of encouraging renovation of existing industrial and commercial buildings to Live/Work use, many cities have relaxed the building codes in several areas including:

- Minimum residential facilities – Equivalent to an efficiency unit or a studio apt for the residential portion. Several cities have set the size to 270-285 SF. Oakland has set a min. size of whole unit to 660SF with live portion not to exceed 1/3, so 220 SF for a min living area.

- Change of Use - Some cities (like San Francisco) have determined conversion to Live/Work does not trigger Change of Use where others (Oakland) do, but have addressed the expensive upgrades in a selective manner such as reducing the seismic retrofit upgrade to 75% of current code. Some have set thresholds, % of building conversion, before Change of Use is involved (sort of like Tacoma has now). With Oakland’s 1/3 – 2/3 limit on residential area, the threshold is an important choice because only the 1/3 is changing its use of any unit... For more on Oakland’s Live/Work Code see [http://www.live-work.com/plainenglish/1999code/newindex.html](http://www.live-work.com/plainenglish/1999code/newindex.html)

- See also Seattle’s list of Substantial Alterations that triggers their Change of Use and Code upgrades. Attached

- Accessibility – Any Commercial Building must be made accessible when that portion is renovated. Three or less Residential units are exempt from Accessiblity upgrade. Live/Work takes these two into account: A live/Work unit that allows for employees or walk-in commercial trade (not just by appt.) must be accessible where these activities occur, including a restroom facility. Men and women toilet rooms are required if more than 4 employees or 4 units with an employee. Live/Work units of three or less are exempt without employees or walk-ins."
- Energy Conservation, Heat and Insulation – See Seattle Code, Long Beach and Emeryville attached

- Sprinkler systems, Fire alarms - One of the basic features of Live/work is its open, so-called “common atmosphere” between living and working. This, of course, flies in the face of the basic building code requirement of occupancy separations, usually fire-rated, between residential and business. Though many cities just say, “sprinkler it”, to mitigate, Oakland limits the hazardous materials & processes and uses the residential requirements for sprinklers, of 16 or more units or three or more stories...

- Ladders and Lofts – See Seattle. Long Beach...

**References:**
See TDA and The Live/Work Institute website –
http://www.live-work.com/

Other websites –

Artists certification guidelines
http://www.arthouseca.org/certification.html

Arthouse’s compendium of resources relating to Live/Work issues:
http://www.artisthelpnetwork.com/datadread.pl?DB=CR_HS&STATE=ALL&menu=ccomforts&order=psv+org+pub+per+web+pro

Long Beach Ca Alternative Regulations for Live/Work uses.
(go to Sec: 18.63)
18.90.010 Purpose.
The purpose of this Chapter is to adopt alternative building regulations for the conversion of existing commercial or industrial buildings, or portions thereof, to joint living and work space for occupation by artists and artisans as allowed by Section 17958.11 of the California Health and Safety Code. This Chapter shall be applicable only to those commercial or industrial buildings located in zones where a live/work use is permitted.
(Ord. C-7534 § 1, 1998).

18.90.020 Application.
Although all other sections of this Municipal Code are applicable to new construction or a change of use or occupancy to a combined living and working space, it is the intent of this Chapter to provide alternatives to those standards which will still provide reasonable safety to the building occupants.
(Ord. C-7534 § 1, 1998).

18.90.030 General.
A. Buildings converted or partially converted to live/work space shall not be considered to have changed commercial or industrial occupancy classifications and/or use for the purpose of determining allowable height, number of stories or floor area of a building, provided that no addition of floor area is made to the building except for mezzanines as provided for in Section 18.90.040.
B. One or more live/work spaces may be established in a commercial or industrial building, or portions thereof, provided the use or occupancy conforms to either the requirements of the Municipal Code or the alternative standards contained in this Chapter where they modify specific Municipal Code requirements.
C. The minimum area of a live/work space established in a
commercial or industrial building shall be seven hundred fifty square feet.

D. No more than thirty-three percent of any one live/work space shall be used for exclusive residential purposes such as sleeping areas, kitchen, bathroom or closet areas.

E. A one-hour fire-rated separation between each live/work space and the next and/or between any live/work space and the adjacent residential, commercial and/or industrial space shall be provided. A full fire sprinkler system throughout the building may be provided in lieu of one-hour fire-rated separation. The fire sprinkler system must be reviewed and approved by the Fire Department. In the event that a full fire sprinkler system is provided, it must comply with current code requirements for residential occupancy.

F. On any floor where one or more units of live/work areas are established, the entire floor shall be brought into conformance with the requirements of this Chapter.

G. No hazardous activity such as, but not limited to, welding, open flame, or storage of flammable or hazardous materials shall occur in a live/work space without specific written approval from the Fire Department, Building Official and Health Department.

H. No retail sales shall occur in a live/work space without specific written approval from the Department of Planning and Building. If retail sales are permitted, such sales shall be conditioned upon the reconstruction of the live/work space as well as the building in which it is located if necessary to comply with the disabled access criteria contained within Title 24 of the State of California Code of Regulations and the federally mandated Americans with Disabilities Act requirements. Such reconstruction may include the installation of ramp or elevator access to floor areas above or below the first floor. The number of business-related visitors and/or deliveries shall not exceed the standard of the home occupations section of the zoning regulations.

I. Noise levels generated by all live/work spaces shall conform to the requirements of Chapter 8.80 of the Municipal Code for residential use.

J. Any building used as a live/work space shall have a fire/life safety sign posted in a conspicuous location at each entrance to the building. The sign shall be constructed of durable weather-proof material and shall meet the requirements of the Fire Department. The Fire
Department and the Health Department shall have the right of access to each individual live/work space for code enforcement inspections. (Ord. C-7534 § 1, 1998).

18.90.040 Alternative standards to the Building Code.
A. Exits.
1. The occupant load of a live/work space shall be based upon one occupant per three hundred square feet.
2. Each live/work space above the first floor shall have access to two stairway exits. Exiting requirements shall conform with Section 3407 of the 1994 UBC Appendix Chapter 34, Division 1 and any successor code sections that may be adopted. However, an existing fire escape and/or ladder may be used as one of the required exits from the upper floor of an existing building, provided that the existing fire escape and/or ladder assembly is approved by the Fire Department and the Building Official.
3. A live/work space on the second floor of an existing building may utilize a Fire Department and Building Official-approved folding or collapsible ladder to the ground from one of the space's windows as a second required exit, provided the vertical distance from the window threshold to the ground is not over thirty-five feet. The window shall have a minimum net clear opening of five and seven-tenths square feet, and minimum net clear opening height dimension of twenty-four inches, a minimum net clear opening width of twenty inches and a maximum finish sill height of not more than forty-four inches above the adjacent floor.
B. Vertical Shaft Enclosures. All live/work spaces shall conform with Section 3408 of the 1994 UBC Appendix Chapter 34, Division 1, and any successor code sections that may be adopted.
C. Corridors.
1. Existing corridor construction may be utilized as an exit without any upgrades when the occupant load of any floor of an existing building converted to live/work space does not exceed ten occupants, except that all transoms and openings other than doors shall comply with Section 1005.8 of the 1994 UBC or shall be covered with a minimum of three-quarter inch plywood or one-half inch gypsum wallboard or equivalent on the room side. In such cases, up to thirty-
three percent of the corridor construction may be replaced or altered with the same materials as the existing corridor.

2. Existing corridor construction may be utilized as an exit to serve live/work spaces with an occupant load of eleven to twenty occupants provided all corridor openings are equipped with doors and self-closing devices and all transoms and openings other than doors shall comply with Section 1005.8 of the 1994 UBC or shall be covered with a minimum of three-quarter inch plywood or one-half inch gypsum wallboard or equivalent on the room side.

3. Existing corridor construction may be utilized as an exit for floors with an occupant load greater than twenty, provided the entire floor affected is sprinklered throughout and all transoms and openings other than doors shall comply with Section 1005.8 of the 1994 UBC or shall be covered with a minimum of three-quarter inch plywood or one-half inch gypsum wallboard or equivalent on the room side. Any new corridor construction shall comply with current code requirements.

D. Sound Transmission and Energy Insulation. Energy insulation and sound transmission requirements need not be installed as a result of live/work spaces being established.

E. Seismic. A change of use or occupancy to live/work spaces may be made without establishing that the existing building complies with current UBC structural requirements. However, compliance to minimum seismic stabilization standards established by the Building Official, that reduce risk to life safety, is required. All requirements within the current Long Beach Municipal Code Chapter 18.68 "Earthquake Hazard Regulations" related to Type I, II and III buildings located within the City and built prior to January 9, 1934, shall comply if any structural modifications are required in the existing building due to live/work use. In addition, any structural or seismic upgrades in existing buildings mandated by future City ordinances shall apply.

F. Light and Ventilation.

1. Light and ventilation requirements for habitable spaces and/or rooms shall only apply to actual habitable spaces and/or rooms provided or, if not physically separated from the working area, to thirty-three percent of the entire live/work space.

2. Mechanical systems of ventilation, including air conditioning, may be utilized to provide an equivalent amount of ventilation.
3. Light for habitable spaces and/or rooms may be provided by means of required sized windows in the working space provided the windows face the habitable spaces and/or rooms and that any partitions separating the working space from the habitable spaces and/or rooms contain transparent materials with an area fifty percent greater in area than the habitable space's and/or room's window area required by code.
4. Light and ventilation requirements for habitable spaces and/or rooms may be reviewed on a case-by-case basis by the Building Official. Where it is determined that the intent of this Section is satisfied, situations not meeting the prescribed criteria of this Municipal Code may be accepted in accordance with Sections 18.04.090 or 18.04.100 of this Code. (U.B.C. § 104.2.7) (U.B.C. § 104.2.8)

G. Toilet, Shower and Bath. Each live/work space shall be provided with a minimum of one code-required toilet and either a shower or bath space.
H. Kitchen Area. Each live/work space shall be provided with a kitchen area.
I. Mezzanines and/or Lofts.
1. Mezzanines and/or lofts may be constructed in a live/work space to serve as habitable residential space and/or storage space.
2. The total area of the mezzanine or loft shall not exceed four hundred fifty square feet or one-third of the floor area of the live/work space unit in which it is located, whichever is the lesser area.
3. The minimum ceiling height above and/or below any mezzanine or loft shall be seven feet, except that where mezzanines or lofts are constructed under an existing sloping ceiling, the average minimum height must be seven feet and the lowest point of the ceiling must be a minimum of five feet.
4. The mezzanine and/or loft may be constructed over enclosed bathrooms and/or storage areas without being considered an additional floor. Mezzanines may be fully enclosed, as long as they meet the exiting and light/ventilation requirements of this Code, without being considered as an additional floor. All accessible space under mezzanines shall be fire sprinklered. Where the space is enclosed underneath the mezzanine, one permanently wired smoke detector with battery back-up in the ceiling of each enclosed space shall be provided as approved by the Fire Department and Building Official.
5. Mezzanines and/or lofts shall be constructed and supported in accordance with the structural requirements of the UBC except that they may be attached to the existing structural frame of the building for support without concern for the effect on the existing foundation. Mezzanines, lofts, their supports, access, guardrails and/or enclosures may be of wood construction without changing the classification of the Type I or Type II building.

6. Mezzanines and/or lofts, which are open to the live/work space below, shall have a guardrail at least thirty-six inches high, which meets current code requirements.

7. Stairways to mezzanines and/or lofts shall meet the requirements of Section 1006.3, Exception 1, of the UBC, except that for mezzanines less than four hundred square feet in area, the maximum stairway incline may be sixty degrees. Ship's ladders are acceptable for mezzanines less than one hundred fifty square feet in area.

J. Sleeping Room Emergency Exit. The emergency egress from open sleeping areas may be provided from windows in the working space or other approved operable openings to the outside or to an exit corridor as required by Section 310.4 of the UBC and subject to Building Official and Fire Department approval. Escape or rescue windows shall comply with current code requirements.

K. Electrical.

1. A minimum of one receptacle outlet for every twelve feet of linear wall measured horizontally on every wall of each live/work space shall be provided. The first outlet from any opening in the wall shall be placed no more than six feet from the opening.

2. The kitchen countertop receptacles shall be served by a minimum of two, twenty ampere 120 volt, dedicated circuits. All other kitchen area wiring shall comply with the current National Electrical Code.

3. Each live/work space shall be provided with a minimum sixty-ampere service for feeder capacity. Each occupant/tenant must have access to the over-current protective devices serving that occupant's/tenant's space.

4. Wiring methods and materials currently allowed in single-family residential constructions may be used within a live/work space.

L. Heating.

1. In the habitable residential portion of each live/work space, built-in
minimal space heaters must be provided. All new heating equipment shall meet current code provisions; however, the capacity of the heating system does not need to meet code. Existing heating equipment serving live/work spaces may be utilized provided the assembly is approved by the Building Department as not posing a health and/or safety hazard. Unvented gas heaters are prohibited.

2. The working portion of each live/work space is not required to be heated; however, if any heating equipment is installed in this area, it shall comply with current code provisions.

M. Elevators. An elevator need not be provided in an existing building as a result of live/work spaces being established. However, the existing stairways configuration must be such that stairs will accommodate the carrying of an ambulance gurney or stretcher. If the stairways do not satisfy this criteria, the stairways may be reconfigured to acceptable dimensions or an elevator shall be required. Both of these options are subject to the review and approval of the Fire Department and the City's Building Official.

N. Smoke Detectors.
1. Permanently wired smoke detectors with battery back-up shall be installed in both the residential and work areas of each live/work space.

2. In the working space portion of the live/work space, a minimum of one permanently wired smoke detector shall be installed in the ceiling. Where the working space is subdivided into separate rooms, one permanently wired smoke detector shall be installed in the ceiling of each such subdivided working room.

3. Where the residential portion of a live/work space does not have at least one direct means of egress to an exit without passing through the working space, the working space shall be provided with permanently wired smoke detectors installed at no more than thirty feet (30') on center on the entire ceiling of the work area.

O. Fire sprinkler systems. Fire sprinkler systems must comply with current code requirements for residential occupancy.

P. Fire alarm systems. Fire alarm systems must comply with current code requirements for residential occupancy.

(Ord. C-7534 § 1, 1998).
Chelsea:

Thank you for the mailing I received today regarding the December 1st meeting. Unfortunately, I have a City Council meeting that same evening (annual Comp Plan amendment hearings), so won't be able to attend.

I live in a 3-4 yr. old townhouse project between Yakima and G St. Two important things for residents in this (and probably other) areas: 1) consider ways to protect of views of the Port, downtown, Mt. Rainier, etc. and 2) provision of some open space amenity, be it a small urban park or plaza. Lack of open space is probably the biggest drawback of the development where I reside.

Other issues: ensure pedestrian connections down the hill (for example, 21st St. is lacking sidewalks between Yakima and Fawcett/Jefferson area); protect Delin St. as a bike route (the easiest way to bike home from the train station); include public investments in street improvements as a potential stimulus to development (21st St. is an embarrassment for a primary connection to the freeway system); in conjunction with additional residential development down the hill, consider the possibility of residential on-street parking permits (UWT student parking appears to be spreading out in a fairly wide area).

Those are just a few thoughts; I hope to be able to get to one of these meetings as my work schedule allows. In the meantime, I'll keep tabs on the project website.

Thanks again for keeping me informed.

Steve Pilcher
Mr. Boudet:

Thank you for the opportunity to comment on the potential scope of the proposed EIS. I am a resident of the "Hillside" area, an owner of a 4-yr. old townhouse across Yakima from the City Steps project. The following are some major issues areas that should be addressed in the EIS:

1. Storm drainage. The project in which I reside suffers from a significant amount of underground water flow; several townhouse units have been damaged from water infiltration during the wet winter months. The EIS should examine storm water for both capture and treatment before release. Incorporating rain gardens and/or ponds developed as amenities/open space should be examined.

2. Non-motorized transportation options. The steep hillside can make walking and bicycling challenging. Alternatives to requiring sidewalks as part of street improvements should be examined (i.e., walking paths that traverse slopes). Identification of bicycling routes, particularly to the T-Dome Sounder Station, should be examined.

3. On-street parking. There appears to be an increase in street parking in the vicinity of UWT. Alternatives such as structured parking, residential parking permits, parking meters, etc. should be examined in light of anticipated parking demand.

4. Signal synchronization. Examine the potential benefits of integrating traffic signals to augment traffic flow.

5. Land Use/Housing/Aesthetics. The document should examine how new development can be effectively integrated with newer development, particularly in the Hillside area where there are several newer townhouse projects. Scale of buildings and view protection should be evaluated. (The unfinished apt. building at 25th & Yakima is an example of development out-of-scale with new, surrounding projects).

6. Vegetation. Identification of significant trees and their potential for preservation should be addressed.

7. Recreational opportunities. Both on-site private open space and public parks should be examined, as the area is currently lacking.

Thank you again for the opportunity to comment.

Steve Pilcher, AICP
Dear Ms. Di Nino,

You did reach the right Department and the right staff contact.

We will add your comment to the record and add you to our notification list.

I just checked our web site and find the item we are both referring to under Hot topics, Item 11. This link should take you straight there: http://www.cityoftacoma.org/Page.aspx?pid=15999. I do not know why your original search did not work for you. Please feel free to call me at 253-573-2478 if there is still a problem, or if you would like to discuss the project objectives.

Thank you.

Ian Munce

---

From: Lynn Di Nino [mailto:lynnndin@msn.com]
Sent: Wednesday, December 28, 2011 1:27 PM
To: phuffman@cityoftacoma.org; imunce@cityoftacoma.org
Cc: info@merrittarch.com; Jake.Fey@cityoftacoma.org; Boe, David; Lauren.Walker@cityoftacoma.org; Arellano, Rey
Subject: Dome/Brewery District Subarea Plan & EIS

RE: Dome/Brewery District Subarea Plan & EIS

When I go to the website cityoftacoma.org/planning and hunt for Dome/Brewery District Subarea Plan & EIS as you outline in your South Downtown Subarea Plan & EIS printed material, I do not find it under 'hot topics', 'cool topics' nor 'good old projects' - I don't find it at all. This is why you may be getting a letter meant for another department. . . . if that's the case please redirect me.

I'm another frustrated citizen noticing that we have to lay off 167 city employees and promote the idea of raising taxes for art nonprofits because of lack of funds, and that somehow, in another funded pocket we have plenty of money for yet more development speculation.

I moved here from Seattle ten years ago when there was plenty of publicity about how Tacoma had changed its building codes to accommodate live/work spaces. Everyone who read that promotional material thought that meant warehouse-type structure CODES had been changed to help developers promote density and refurbishment in abandoned areas of town, like our 'brewery' district. (What I mean by this, is the updating of codes helps developers remodel unusual spaces, legally, to accommodate residents). Still, these codes have not been updated.

In Seattle I watched four neighborhoods become VERY active and dense, ORGANICALLY. What I witnessed was the classic urban renewal: first the codes change and then the artists move into what started out as a pretty scruffy, unhip area, almost abandoned in some cases. Their foot traffic drew other businesses and within a few years it became the hip place to be with lots of commerce and feet on the ground. These economically booming renewal areas are Belltown, Ballard, Columbia City and upper Capitol Hill.
If we have 'free' money to spend on our transportation hub why can't we have a huge promotional campaign to advertise Freighthouse Square and its amenities, for example? I do not suggest this because I have ties to the owners or the businesses. I do not. I feel it's a no-brainer because this giant enclosed structure, already sitting there, underutilized, is RIGHT in the middle of our transportation hub and could be a tremendous asset to our town.

I have lived here long enough to have seen at least four funded studies, all in the interest of downtown development and feel like they've all been a waste of money, each duplicating the research and efforts of the last. Can we simply update the codes to accommodate live/work, develop these near-abandoned areas of town organically and get clever about how to use 'free' money on a practical idea?

Someone, please set me straight: Why spend this money on a generalized EIS study? Why is it we haven't or don't promote Freighthouse Square? WHY HAVEN'T WE CHANGED THE CODES TO ACCOMMODATE LIVE/WORK spaces, thereby encouraging developers of already existing housing stock?

I was unable to make the last meeting, please add me to your notification list.
Thank you, Lynn Di Nino
From: Jill Barkley CWT [Jillcwt@comcast.net]
Sent: Thursday, December 01, 2011 3:39 PM
To: clevy@cityoftacoma.org
Subject: Fw: I have an idea to share

----- Original Message ----- 
From: Jill Barkley CWT 
To: imunce@cityoftacoma.org 
Sent: Thursday, December 01, 2011 3:37 PM 
Subject: I have an idea to share

My name is Jill Barkley. I am a 4th generation resident of Dash Point, and I live in Pierce County. I have been active in the organization Points NE Historical Society for 25 years as a co-founder. I have been co-president of the Tacoma/ Pierce County League of Women Voters in the 1980's and I have grown along with Tacoma for 60 years, in school, for medical/dental, in parks and recreation and I remember the downtown shopping stores, like Peoples, The Bon Marche, and Leeds, Woolworths and Pennys to name a few. I have been a 20 year travel agent with Carlson Wagonlit Travel (now Travel Leaders) until I retired last year.
This is just to let you know that I know Tacoma pretty well.

I believe that the key to making Tacoma great is connecting the gems IN Tacoma. If you have ever been to Washington DC, San Diego, San Francisco, and Florida cities, you might have noticed or used the TROLLEY services that tie these city's resources together. As I look at Tacoma, and it's surrounding areas, I notice that there is not cohesiveness from DOWNTOWN TO OLD TOWN/RUTSON WAY, TO POINT DEFIANCE PARK, TO PROCTOR ST, TO CHENY STADIUM, TO TACOMA MALL, TO MCKINLEY HILL, TO THE TACOMA DOME. It seems to me that a PRIVATE COMPANY could house and create a trolley line that goes in a circle around Tacoma. The trolleys I've seen are WHEELED, not on expensive tracks. This allows the trolley cars to be flexible. For instance, if there were a motor trolley barn with extra cars, they could be put in motion during events such as the Browns Point Salmon Bake, the Puyallup Fair, Dome events, Park District events (like Fort Nisqually), the Old Ships and boat events, and Zoo visits. It would take visitors all around the town and make money with special events. 1 to 3 day passes are the usual fares. A private company would have the responsibility to make it all work.

So, my advice as a hometown tourist is to TIE THE CITY TOGETHER. It is so fragmented, that our cars are required to enjoy it all. Hop on hop off seems like a great idea, so I'm forwarding it to your think tank. Thanks for listening.

jillcwt@comcast.net
January 8, 2012

2500 North Lawrence Street
Tacoma, WA  98406

Community and Economic Development Department
747 Market Street, Room 1036
Tacoma, WA  98402

Re: South Downtown Sub-area Plan

I’m pleased that the City is engaged in a comprehensive and long-term approach to planning in the Brewery, Dome and nearby areas. This letter reflects my concerns and recommendations as a 16-year Tacoma resident with strong interests in urban design issues and the adaptive re-use of historic structures.

Existing Context
The south downtown sub-area is quite large and contains a number of distinctive neighborhoods and structures. Environmental, zoning, urban design and project design guidelines are likely to flow from the overall sub-area plan so it is important that these distinct neighborhoods and buildings are identified and described so that their contributions to the larger district can be conserved and enhanced.

Over the past 25 years, the City has conducted historic resource inventories identifying structures and sites that are architecturally, historically and/or culturally significant. According to the City’s Historic Preservation Office, the most recent inventories in the sub-area were conducted in 2001-2003.

Recommendation: Historic resource inventories should be updated so that historic and cultural resources can be protected and preserved during redevelopment activity; I understand that funding is available within the scope of this project. Special attention should be paid to groups of buildings or contiguous blocks, their massing and scale.

Redevelopment Outcomes
A. Housing
Studies which discuss the revitalization of downtown Tacoma have consistently recognized the critical role of housing. Development in the existing development zones to the west, including small islands of existing historic residences, should be encouraged. There are selective opportunities for high-density infill construction but, due to cost and marketability, new housing would not be the first major investment in the district.

Live-Work housing: The area presents a special opportunity for the adaptive re-use of industrial buildings as live-work space.

1. Cost. Live-work spaces are ideally suited to the adaptive re-use of historic structures and they could be the foundation of housing of the area. As opportunities for completion of larger developments may be slow in coming, the incorporation of lofts could be accomplished on an as-needed basis. Development and rental costs would be more feasible for developers and potential tenants.
It would be nice if some of the currently empty lots could be converted to public green space, perhaps even including an off-leash dog park.
From: Franklin M. Clinton [mailto:fmclinton@msn.com]
Sent: Friday, January 06, 2012 8:22 PM
To: Planning
Subject: South Downtown (Brewery/Dome District) Subarea Plan

Gentlemen,

I just e-mailed a comment regarding this plan, but I am not sure if it arrived via Outlook, so I will try to recreate it.

I am concerned about new development (residential and business) not being required to provide sufficient parking to negate its impact upon existing housing, office and businesses. City rules currently don't require sufficient off-street parking for business. My business and the tenants in my building have already been affected by this. We have had to become "parking lot police" to ensure that our off-street lot is only use by our clients.

This plan doesn't provide for any larger public open/green space/park lands for use by future residents of the district. My business is across the street from 5 acres of City owned property between Tacoma Avenue and Jefferson. Since the City has been mowing it periodically in the summer it is surprising how much use this defacto park gets in the summer and on nice days the rest of the year. The City should reserve a portion of this property for a partially fenced lawn type park with a few trees where people can picnic on the grass, throw a Frisbee, play catch or walk their dog. The City owns the land already and to develop a "City Green" type park would not be too expensive. (Perhaps the block from Court E to Fawcett and So. 23rd to So. 21st.)

Tacoma Avenue's street configuration should not be changed. It is the last commercial freight friendly street on the hillside and part of the Center Street/Tacoma Avenue/South 21st Street freight corridor to the freeways. Angled parking and boulevard/center-of-the-street plantings make commercial freight traffic impossible. Please don't change the configuration or parking design in this area of Tacoma Avenue.

Thank you, Kip Clinton, President Clinton's Music House, Inc.
2301 Tacoma Ave. So. Tacoma
Munce, Ian

From: Boudet, Brian on behalf of Planning
Sent: Wednesday, January 11, 2012 10:57 AM
To: Levy, Chelsea; Munce, Ian
Subject: FW: I have an idea to share

From: Jill Barkley CWT [mailto:jilcwt@comcast.net]
Sent: Friday, December 16, 2011 3:28 PM
To: Planning
Subject: FW: I have an idea to share

Wouldn't the Old municipal dock make a great trolley barn?

----- Original Message ----- 
From: Jill Barkley CWT
To: munce@cityoftacoma.org
Sent: Thursday, December 01, 2011 3:37 PM
Subject: I have an idea to share

My name is Jill Barkley. I am a 4th generation resident of Dash Point, and I live in Pierce County. I have been active in the organization Points NE Historical Society for 25 years as a co-founder. I have been co-president of the Tacoma/ Pierce County League of Women Voters in the 1980's and I have grown along with Tacoma for 60 years, in school, for medical/dental, in parks and recreation and I remember the downtown shopping stores, like Peoples, The Bon Marche, and Leeds, Woolworths and Pennys to name a few. I have been a 20 year travel agent with Carlson Wagonlit Travel (now Travel Leaders) until I retired last year. This is just to let you know that I know Tacoma pretty well.

I believe that the key to making Tacoma great is connecting the gems in Tacoma. If you have ever been to Washington DC, San Diego, San Francisco, and Florida cities, you might have noticed or used the TROLLY services that tie these city's resources together. As I look at Tacoma, and its surrounding areas, I notice that there is not cohesiveness from DOWNTOWN TO OLD TOWN/RUSTON WAY, TO POINT DEFIANCE PARK, TO PROCTOR ST, TO CHENY STADIUM, TO TACOMA MALL, TO MCKINLEY HILL, TO THE TACOMA DOME. It seems to me that a PRIVATE COMPANY could house and create a trolley line that goes in a circle around Tacoma. The trolleys I've seen are WHEELED, not on expensive tracks. This allows the trolley cars to be flexible. For instance, if there were a motor trolley barn with extra cars, they could be put in motion during events such as the Browns Point Salmon Bake, the Puyallup Fair, Dome events, Park District events (like Fort Nisqually), the Old Ships and boat events, and Zoo visits. It would take visitors all around the town and make money with special events. 1 to 3 day passes are the usual fares. A private company would have the responsibility to make it all work.

So, my advice as a hometown tourist is to TIE THE CITY TOGETHER. It is so fragmented, that our cars are required to enjoy(?) it all. Hop on hop off seems like a great idea, so I'm forwarding it to your think tank. Thanks for listening.

jilcwt@comcast.net
From: MIKE TARTAGLIA [mailto:mtag-99@msn.com]
Sent: Friday, December 16, 2011 10:18 AM
To: Planning
Subject: Sout Tacoma Development Comment

Dear Sir/Madam,

Re: Property at 1527 South G Street, Tacoma WA

I do approve of the building process expansion in the South Tacoma area. Please consider giving a 1-4 year property tax abatement to all residents in the affected area for the inconvenience of building and traffic congestion during the building and planning process.

Michael Tartaglia
615 SW 346th St
Federal Way, WA 98023
206 356 2769
Hi. I want to comment on the railroad overpass on Pacific Ave. I have been long handicapped in my local travels due to the construction, but was confident the design would be up to the hassle.

Boy, was I wrong. The overpass that was recently installed over Pacific is incredibly Spartan, which is the most positive adjective I can apply, but downright Ugly fits the bridge better. Could you not have installed something one would not find in the backwoods where the deer could care less about its appearance? Was there no-one bright enough or thoughtful enough to design a railroad bridge that could salute Tacoma, rather than give the main street entrance to the town a big raspberry?

I guess it's a fate accomplished now, and no amount of noise will get rid of the big gray slab of utilitarian iron, but I can at least tell you this was, from my perspective, a huge error in judgment, made by an equally utilitarian bureaucrat with nary a design bone in his or her body.

It's a brand new piece of Tacoma blight.

Lance Harris
3001 E. J St.
Tacoma, 98404-3220
2. **Integration.** Loft-housing would fit well within a multi-use concept for the sub-area and provide critical day-round occupancy and "eyes-on-the-street" required for a safe and credible development.

3. **Flexibility.** The lower cost integration of loft housing early in development does not preclude the evolution of use of a property as purpose-built housing does.

4. **History.** Developments in other cities, for example, Belltown in Seattle, have been predicated upon the incorporation of live-work housing in early stages of project development.

**Recommendation:** In the interest of encouraging renovation of existing industrial and commercial buildings to live/work use, Tacoma should review and update related building codes.

**B. Adaptive Re-Use**

Because I believe we should make use of the distinctive qualities of the neighborhoods and buildings in the sub-area and value the environmentally sound principles implied by the re-use of existing buildings and materials, I'd like to see the City use adaptive re-use as a development driver. Supportive new development, as required, would provide critical mass and variety across the sub-area. There are several models which provide good reference points:

**UWT**

The campus provides a great model:

1. It shows how a nearly seamless scheme of adaptive reuse and infill construction can transform a large cluster of historic industrial buildings into a smoothly functioning urban environment.

2. It illustrates the importance and function of entry portals as transit and pedestrian transition zones.

3. It demonstrates that access and accessibility can be achieved in a nearly vehicle-free environment.

4. Campus planning demonstrates that infill construction can occur without scarring of the historic character of the place. New construction fits within the existing mass and scale; more ambitious architectural statements are limited to the perimeter of the campus.

**Portland’s Pearl District**

The district was already integrated into the urban fabric, and its industrial character was retained while expanding into new uses. Infill and replacement construction expanded the market base without affecting the character or the historic fabric of the district.

**Granville Island, Vancouver, B.C.**

Analogous in many ways, this dirty industrial area was re-purposed as a destination district to include hospitality, residential, artists’ foundries, potteries, galleries and public-use spaces. Some select industrial uses were retained, and all co-exist in a lively combination of activities where pedestrian and some vehicular traffic are permitted to co-exist, with appropriate segregation. The core area of Granville Island is about the size of the UWT/Brewery districts of downtown and the transformation was accomplished with the attributes listed for UWT above, while remaining a non-
institutional, urban development.

*Historic Seattle's Public Development Authority*

Since 1974, Historic Seattle has purchased, sold, owned, developed and invested in historic properties for the purpose of preservation and re-use, taking on projects that would not pencil out for developers.

**Recommendation:** Consider establishing a city-chartered PDA targeted to the adaptive re-use of historic structures to provide valuable tools in an area prime for redevelopment that includes a number of city-owned properties.

C. Retaining the Narrative

In closing, I’d like to encourage the City to retain the cultural and historical narrative of the sub-area. Updated historic resource inventories will give more definition to the sub-area’s strong narrative which ties to transportation (the railroad and the port), the warehouses, and the breweries. The retention and repurposing of buildings formerly used to support those functions acknowledges and celebrates Tacoma’s industrial past while setting a clear path to the future. I hope that redevelopment plans are responsive to the social, economic and material culture of the district as already exemplified on the UW-T campus.

Sincerely,

Sharon Winters
January 5, 2012

Attn: Brian Boudet
City of Tacoma
Community and Economic Development Department
747 Market Street
Tacoma, WA 98406

Re: South Downtown Sub-area Plan

Dear Brian,

This letter reflects my concerns as a lifelong resident of Tacoma. While I am active in other organizations with a stake in this process, I wish to comment on a wide range of subjects that may or may not comport with the mission or message of those entities. These comments are general in nature and do not the full depth of study required in each instance. I do, however, hope that they outline for the principals of the study a set of values that will help fix the importance of referenced items in the context of the overall Plan.

1. Administration
At the scoping meeting held on December 15, 2011, I heard comments from several stakeholders regarding the intended transparency, or perceived lack thereof, in the planning process just begun. Objections were as follows:

- The period between public introduction and scoping was very short, the bulk of it occurring between Thanksgiving and Christmas. Some business representatives and residents complained of difficulty of arranging attendance due to pressures of the season.
- To-date, advance information was considered sparse, and meeting notification was considered too short-notice for many to arrange attendance.
- In light of the above the length of the comment period was considered quite short, and should be extended.

On the subject of 'transparency' and the desired level of public involvement, and as an architect who has led lay client committees through multi-year master planning and construction projects, I respectfully submit the following:

- Consider the participatory *experience* of private sector attendees, not just the calendar, in outlining the flow of events.
Remember that true involvement of stakeholders requires more than simple notification on the part of the hosting agencies, as indicated by the complaints noted above.

Meeting notices should provide private stakeholders ample time and supporting information to prepare their input and to anticipate next steps, for such a multi-acre, non-project review action.

2. Plan Boundaries
The “Sub-area” addressed in the Plan is exceedingly large and contains within it many very distinct neighborhoods or zones, some with very distinct boundaries, which could be termed ‘sub-areas’ in their own right. Environmental, zoning, urban design and project design guidelines are likely to flow from the overall South Downtown Sub-area Plan. Therefore, it is of paramount importance that these distinct zones are identified and described with their unique attributes at the outset in order to preserve and enhance their unique characteristics and their contributions to the larger district, and permit respondents to address them in-kind.

In the South Downtown Sub-area we see:

• **Mixed-rate and affordable housing.** These occur from Yakima Avenue down-slope to Fawcett Avenue, and represent a growing upgrade in quality of life for residents in the most hard-pressed economic strata of our society. Zoning should be enhanced to further and complete the development of mid-density housing in these abutting neighborhoods that form the west boundary of South Downtown. As with all planning districts consider that the edges are most critical in providing protection, access and transition between districts and that for the purpose of the Plan, the residential areas and the undeveloped commercial zone are mutually supportive.

• **Former heavy industrial sites.** Contiguous, large volume buildings that may support a wide variety of uses. See “Visualizing Outcomes” below.

• **Mixed-use buildings.** Structures such as the former Chihuly complex and the corporate facilities of Ault Electric Co. permit a variety of urban uses.

• **The Former Pacific Brewing Co.** complex of buildings south of S. 25th and Holgate. These structures have special historic significance and character and could be considered their own sub-district.

• **The Dome District** has for years articulated its own identity and preferred role, both within the fabric of the City and as a unique urban environment within the greater Downtown planning area. I will not consider it further here, except to note that most points raised in this letter apply to this district, at least in general terms. With the recent negative impacts suffered due to decisions made by the City regarding railroad re-alignment the Dome District deserves to be considered a partner on par with UWT on all area-wide considerations, and the voice of its representatives be given the full weight of precedent.
• **Historic Buildings** throughout the study area need to be catalogued and recorded as cultural resources, both as individual buildings and particularly when they exist as members of a group or contiguous block of buildings. These structures are character-defining by any measure and their role as historic and readily adaptable structures should lend them priority status wherever they are found.

• **Other possibilities** no doubt abound and I urge identification and special consideration wherever they are found. Again, consult Dome District representatives for input on this question.

• **Such sub-sub-areas** should be identified and described as a part of the Existing Conditions Survey.

3. **Planning Approach: SEPA and Environmental Issues**

I agree with comments made at the scoping session that praised the concept of defining over-arching and systemic solutions that are not effectively addressed at the typical project level, and particularly not at a scale envisioned in the definition of the study area. These include comprehensive toxics identification and remediation, right-of-way improvements, storm water management, utility delivery, street lighting, district-wide ADA compliance planning and other issues that can only be effectively or economically addressed on an area-wide basis, and with direct City participation.

The speakers also described the practical limits of such over-arching permitting. While the sub-area planning process will result in the definition of the responsibilities and roles of public and private entities in the foundations of this large and multi-faceted district, it should also describe the interface of the systemic and the particular as they relate to the attainment and enhancement within the described study area by the process of site-by-site development. The result should be a nearly seamless system of general and specific responsibilities for each applicant. I believe that the ultimate result should not necessarily be a “silver bullet” for would-be developers or an absolute reduction of responsibility to each project proponent, but rather a division of responsibilities that leads to the accomplishment of the greatest good through the most economical means through a just and prudent division of effort. Efficiencies should be achieved by economies of scale and appropriate divisions of responsibility achieved by such an overview, and apportionment of “do-able” and appropriate responsibilities to each applicant.

The inherent economic and environmental benefits of utilizing the extant historical building fabric as a basis for redevelopment should be granted full hearing and value in the project approach, beginning with the Existing Conditions Survey.

4. **Visualizing Outcomes**

SEPA compliance and infrastructure assessments cannot occur in a vacuum, so it is important to project and define, at least at a macro level, the appropriate types and quantitative limits of development. Beginning with the Existing Conditions Survey and
continued through the formulation of planning goals and strategies, the sub-systems and their roles, as well as the goals of future development in the Sub-area should be identified. I emphasize strategies because much of the burden on existing and aggregated resources is due to new and projected development. I offer a rudimentary value system for evaluating future actions.

- **Accessing and traversing the sub-area**
  
  Motorists, pedestrians and transit patrons will be arriving from adjacent parts of the City, or of the sub-area. A physical and visual continuation of their path of travel and sense of arrival through suitable portals of entry are important aspects of any strategy. Due to the historic heavy industrial nature of the Brewery District businesses, citizens have, through habit and arterial routes, been conducted around, rather than to and through the district. Visual corridors into the district as well as clear traffic transition nodes are important in re-integrating this important district into the fabric of Downtown. Similarly, how future motorists experience the city as they pass by on I-5 and I-705 will be extremely important. Currently, parts of downtown are highly visible but could be completely obscured in the future, depending on the siting and bulk standards for new buildings. Kevin Lynch’s 1964 book, “The View from the Road”, investigates how a city is read from a passenger car as one passes through the urban fabric.

- **Transit**
  
  Assure that transit stops are combined with entry nodes and pedestrian access points.

- **Parking**
  
  In Tacoma, as in other cities, surface parking lots in the urban core often denote a lack of attainment, not to say failure, of planning and development objectives. While their existence is always rationalized, their location is often inopportune. The can present a jarring hiatus to the visitor, as a sudden loss of visual orientation or continuity of travel, or as a physical barrier to be traversed. They can represent economic barriers by interrupting a necessary and symbiotic critical mass of businesses that may depend for customer traffic upon a sense of place created by a community of diverse and active shopfronts operating in harmony. Consideration should be given to requiring that all new buildings contain off-street parking, preferably below grade.

It is important, therefore, that surface parking, while to some degree necessary, be located at logical entry and auto-pedestrian transition nodes, creating entry ‘events’ at significant portals.

- **Development limits**

  I was dismayed to see the bulk envelope diagrams as presented in the preliminary information packets - not because I do not support the need and desirability of high-density development in the overall development scheme of historic districts, but because the impression is given that the entire district is open to such high density
development. I believe that the ultimate result of the literal interpretation of these diagrams would be to reduce the entire area(s) represented to raw real estate. I question, and do not know, whether the absorption capacity of the city as a whole, as apportioned to this area, could support such a dense development scheme. As will be seen in discussions below, the maximum re-use of the historic fabric of the Brewery and Dome Districts should be the first priority of the ultimate vision for these areas. I think it perfectly appropriate to indicate that diagrams represent that the entire district is open to high-density infill construction in support of the maximum use of the existing historic fabric, and up to a limit to be determined by the results of an historic resources survey. Appropriate coverage limits could be set upon completion of the existing conditions and historic structures survey. Consider requiring that the facades of new buildings are brought out to the street, actively contributing to it with visible an transparent commercial uses and/or residential uses or units that actually front on or access form the street. Also, dense infill development should only be allowed through transfer of development rights from these identified historic structures. This could lessen their tax burden while providing additional resources for their restoration and reuse.

On the subject of development strategies, the South Downtown Sub-area Plan is an excellent context within which to explore the formation and application of a Public Development Authority to key elements of the Plan.

- **Models for reference**
  We all approach grand schemes such as this one from a visual and experiential standpoint. I offer my thoughts here, and I suspect that the best approach will be some combination of the three examples below.

  **UWT**
  I believe that the University of Washington Tacoma Campus is a stellar model on several fronts.
  1. The campus shows how a nearly seamless scheme of adaptive reuse and infill construction can transform a large aggregation of historic industrial buildings into a smoothly functioning urban organism.
  2. The campus illustrates the importance and function of major and minor entry portals as transit and pedestrian transition zones.
  3. It demonstrates that access and accessibility can be achieved in a nearly vehicle-free environment.
  4. Campus planning here demonstrates that significant infill and additive construction can occur without scarring of the historic character and theme of the historic fabric of the place. This is due largely to the subordinate and supportive design role the new work plays in the critical function of adding necessary building volume and continuity. More ambitions architectural statements are limited to the perimeter where function and identity play a more active role in engaging the surrounding urban environment.
Portland's Pearl District
This district was already integrated into the urban fabric, and its industrial character was retained while incorporating an expanded palette of urban uses and amenities. Again, infill and replacement construction were accomplished to expand the market base of the district without impacting the original character of the historical fabric. Granville Island, Vancouver, B.C.
I think this development has perhaps the most lessons to offer us in this venture. Here was a literally dirty industrial area that was re-purposed as a destination district to include hospitality, residential, dining, drinking, artists' foundries, potteries and galleries and public-use spaces. Some select industrial uses (such as a sand and gravel/concrete operation and a functioning boatyard) were permitted to remain, and all co-exist in a lively combination of activities where pedestrian and some constrained vehicular traffic are permitted to co-exist, with appropriate segregation. The core area of Granville Island is about the size of the UWT/Brewery districts of downtown and the transformation was accomplished with the attributes listed for UWT above, while remaining a non-institutional, truly urban, commercial/industrial development.

- **Permitted uses**
  In keeping with the examples of the Pearl and Granville Island examples above, I prefer to envision a multi-use rather than a mixed-use approach to development in this district. It has been shown in these examples that certain industrial uses may co-exist happily (or tolerably) with the more tightly controlled menu of occupancies commonly associated with a “mixed use” district. The sensitive re-use of an historic structure for the Ault Electric Co.'s operation is a good example of such uses. Such an approach will expand the base of development opportunities and help put some core industries of the city on better display to the public.

A corollary to this position is that the City of Tacoma is a property owner in these districts. As such, and as a sponsor of the study now beginning, the City should bind itself to the findings and recommendations of the study and be willing to adjust its operations to support the preferred results of development.

- **Adaptive re-use as a driver of development**
  As I mention above, I believe that the formative concept of the Sub-area Plan should be the highest and best use of viable historic structures, with supportive development as required to provide critical mass and variety across the district.

- **Housing**
  Since I first participated in a study for the revitalization of Downtown Tacoma in 1969, virtually every plan and study conducted for or by the City for that purpose has recognized the critical role of housing in the true life of the urban core. Housing will again be a vital component in the South Downtown Sub-area at every planning horizon and development phase. I can see at least three ways in which housing can and should be incorporated into all phases of planning and development.
Existing Housing
Development in the existing development zones to the west, including small islands of existing historic residences, should be encouraged. Planning in the existing commercial/industrial districts should be conducted to provide appropriate separation and access, but avoid isolation of these valuable contributing housing districts.

New Housing: Purpose-Built
This is a fine use for the high-density infill construction to be judiciously allowed with in the sub-area. Such housing would be relatively high-cost to construct and to market, with resultant higher cost rents and mortgages. At such rates, likely purchasers and renters would demand an established and thriving area in which to reside. Due to cost and marketability, perhaps new housing would not be the first major investment in the district. Consideration should be given, however, to more modest, mid-level residential, with possibly an occasional high-rise tower to add visual interest.

Residential populations will also have to be planned with schools, parks and community centers becoming integral parts of future neighborhoods. I am told that many consider Belltown in Seattle to be a failure as a neighborhood to the extent that schools and parks were not planned into it. This is in contrast to new neighborhoods that were planned with schools and parks as integral elements, such as the former Expo 86 site on False Creek in Vancouver, B.C.

Artists' Lofts - Live/Work Housing
Tacoma has a mixed history, and success, regarding “loft living”. I believe that the Sub-area Plan provides a unique opportunity to re-address this issue on several fronts.
1. Cost. Live-work spaces are ideally suited to the adaptive re-use of historic structures which should be the foundation of this redevelopment of this broad area. As opportunities reserved for completion the full occupancy of any unit of development, the incorporation of lofts could be accomplished almost on an as-needed basis with in the use-zone(s) of the included district(s). Development and rental costs would be more approachable for developers and potential tenants than for purpose-built housing.
2. Integration. Such loft-housing would fit well within the “multi-use” concept discussed above, and provide critical day-round occupancy and “eyes-on-the-street” required for a safe and credible development.
3. Flexibility. The lower cost integration of loft housing early in development does not preclude the evolution of use of a property as purpose-built housing does.
4. History. Developments in other cities, most notably, Pioneer Square in Seattle, have been predicated upon the early incorporation of live-work housing in the early stages of project realization.

- Phased, successful development
Any development of the scale of the South Downtown Sub-area will materialize over a significant span of time. It will be important to gauge in advance the scope and
content of each and any "phase" of development. To be successful, sufficient extent and variety, including access, identity, strong character statement, a housing component (see above), and more, must be included. The composition of any component of any part of the overall plan must be a microcosm of the whole.

Similarly, the Plan needs to be adaptable, allowing it to respond to changing economic, sociological and technological conditions. Live/work housing units can help to provide just such flexibility. In Vancouver, B.C., as you can see, one of my favorite cities, former office blocks have been converted into housing with many residents working out of their units.

- A continuing story
  The planning horizon of such an ambitious undertaking suggests that directions and priorities might undergo significant shift in the course of achieving full development. I believe that if the above are taken under consideration at this, the earliest of planning phases, that the ability to weather a variety of course corrections will be built-in to the plan.

I appreciate the opportunity to submit these comments and look forward to a conclusion of which we can all be proud.

Very Truly Yours,

Gary Knudson
Jan. 7, 2012

Dear Mr. Mercer,

We are writing to express our strong objection to the development of the Dome District.

We also strongly object to the creation of any structure that would obstruct the view, in any way, that has been enjoyed at this hill for over one hundred years.

Bennie & Arthur Miller
1015 30th St.
Tacoma, WA 98404
253-272-5141
The Hillside Development Council had determined that the following items should be included in the scope of work for the Dome / Brewery District Subarea Plan & EIS. Those listed in bold we feel are most critical to the future of the Hillside Area. Additionally we continue to embrace our April 24, 2008 Vision Statement and VIA’s 2010 study.

- Contaminated soil and ground water is a key issue on the hillside and a mitigation plan should be implemented.

- 21st Street vehicle traffic including the 509 and 705 freeway entrance/exit. Develop 21st Street all the way up the hill.

- 21st Street pedestrian and bicycle crossing at the Prairie Line Trail.

- The “6 acre site” is the catalyst for development in the Brewery District. Development should be consistent with the 2010 VIA study and HDC’s Vision Statement.

- Access to existing buildings for customers, clients and freight must be maintained.

- No freight on D-M track.

- Sequential phasing of new infrastructure

- Focus initial development around transit opportunities

- Where will new construction be planned?

- What and where will the future densities be?

- Density should be addressed per HDC’s vision statement.

- Streetcars or trollies should serve the area, continuing to the MLK District.

- Parking: on street, off street garages and surface lots as needed to support business. Garages are preferred over surface lots and no on-street spaces should be lost due to development.
Hillside Development Council

- Do not turn Tacoma Avenue into a boulevard with trees in the center.
- Movement of vehicles in a North-South direction needs to be improved.
- Transit east-west to Tacoma Ave. / Yakima / MLK from Pacific Avenue should be investigated. Potential options include a hill-climb or trolley system.
- Maintain freight access (including during periods of snow and ice) to and through the district.
- The use of geothermal energy coupled with a central energy plant servicing the whole area.
- View abundant ground water as a potential asset.
- Parks, including dog parks, are lacking in this area and are needed. Attention should be paid to the development of the “remnant lots” that Sound Transit has created in their D-M Street Project.
- Historic buildings should be addressed per HDC’s comments in the VIA 2010 study.
- Maintain views or at a minimum view corridors.
- Preserve safety assets: fire and police.
- CPTED driven design should be a requirement for all development.
- Upgrade the condition of streets and sidewalks.
- Fawcett has been designated as a bike boulevard in the Mobility Master Plan. Its effect needs to be considered in development plans.
- LEED ND Status
- Right plant in the right place.
- Social service providers are already a burden that should not be increased in this area.
- Infrastructure improvements should be underground including:
  - Power
  - Water
  - Sewer
  - High Speed Internet
From: Walk the Waterfront <community@walkthewaterfront.org>
Subject: Comments South Downtown/Dome/Brewery District Subarea Plan
Date: January 6, 2012 5:07:53 PM PST
To: Ryan Petty <ryan.petty@cl.tacoma.wa.us>, "Ian Munce J.D. AICP"
     <imunce@cityoftacoma.org>

Memo to Ryan Petty, City of Tacoma Economic Development,
       and Ian Munce, Tacoma Planning Department:

Walk the Waterfront advocates for healthy lifestyles through public access to and
along Tacoma's spectacular Thea Foss, Commencement Bay and Puget Sound
waterfronts.

We appreciate the opportunity to participate in the planning of the South
Downtown/Dome/Brewery District Subarea Plan & EIS and request that you add this
community@walkthewaterfront.org email to your mailing list.


In response to the City of Tacoma's overall planning efforts concentrating on the
South Downtown/Dome/Brewery District Subarea Plan & EIS, Walk the Waterfront
encourages you to protect and enlarge the opportunities for safe, wide biking and
safe, wide walking paths connecting the Tacoma Dome, LeMay America's Car
Museum, University of Washington Tacoma campus, Freighthouse Square, and
Pacific Avenue/Center Street intersection with Thea Foss waterway via the East D
Street entrance to Dock Street.

Hundreds of miles of Western Washington hiking and biking trails converge in the
neighborhood of the Tacoma Dome. The pedestrians and bicyclists enjoying these
trails should readily see safe, wide paths with appropriate signage directing them to
continue to Thea Foss waterfront and ultimately along all 7 miles of our waterfront
park system through the Point Ruston development to the Point Defiance Park and
Zoo. An estimated 400,000 people will visit the LeMay America's Car Museum
annually. These visitors should be welcomed to walk to and along our Thea Foss and
Commencement Bay shorelines.

Approved uses in zoning for the South Downtown/Dome/Brewery Subarea should
include tourism, education, retail, financial, arts, local businesses, manufacturing,
residential and parks. There are other more appropriate areas for medical, recycling
or polluting businesses and therefore should be disallowed in the zoning for this
area.

Washington's waters belong to the citizens and view corridors, setbacks and
graduated height limits should be designed and mandated to share the visual access
to our waterfronts within this potentially densely developed subarea.

Page 1 of 2
From: Walk the Waterfront <community@walkthewaterfront.org>
Subject: Comments South Downtown/Dome/Brewery District Subarea Plan
Date: January 6, 2012 5:07:53 PM PST
To: Ryan Petty <ryan.petty@ci.tacoma.wa.us>, "Ian Munce J.D. AICP"
<imunce@cityoftacoma.org>

Memo to Ryan Petty, City of Tacoma Economic Development, 
and Ian Munce, Tacoma Planning Department:

Let us draw your attention to New York's very popular HighLine trail system of 
elevated pedestrian corridor built over old, unused train trestles and now connecting 
buildings and neighborhoods above the traffic.

http://www.thehighline.org/

This creative approach could be zoned into this area to be added during the building 
of new residential and commercial developments.

Walk the Waterfront requests that lighting and sidewalk design be coordinated to 
create an attractive and safe environment for tourists and visitors and a healthy, safe 
pedestrian lifestyle for residents. All buildings in the South Downtown 
Subarea/Dome/Brewery District Plan should be required to provide awnings on each 
building to keep pedestrians dry with the awnings extending far enough for the rain 
dripping off of these awnings to fall into the street gutters, not onto pedestrians.

Thank you for adding Walk the Waterfront's comments into the public record for the 
South Downtown/Dome/Brewery Subarea Plan & EIS and we look forward to staying 
involved in the design process of this significant area of Tacoma.

Sincerely,

Rick Rose 
Vice President

Walk the Waterfront - It's Everyone's Front Yard
community@walkthewaterfront.org
http://walkthewaterfront.org
January 10, 2012

Mr. Brian Boudet
South Downtown Subarea Plan
Community and Economic Department
747 Market Street, Room 1036
Tacoma, WA 98402

Dear Brian:

Re: Comments Regarding South Downtown Subarea Plan Project
From: AIA Southwest Washington Committee on Community Advocacy

The AIA Southwest Washington Committee on Community Advocacy, on behalf of our Chapter membership, supports efforts to create a common vision for the future of the South Downtown districts and neighborhoods. A number of chapter members attended the recent Scoping meeting held on December 15, 2011. This letter is intended to provide the City and the Planning Team with principle and value-based comments directly related to the South Downtown Subarea Plan and its overall relationship towards future citywide master planning and development efforts.

The mission of our committee, which falls within the broader structure of AIA, is to “advocate for principles of livability and sustainability within the communities of our chapter”. We seek to provide a trusted voice regarding design within the communities of our chapter, generally advocating within the framework of AIA’s “10 Principles for Livable Communities”. We have structured our comments within this 10 principle framework. Our comments are by no means exhaustive, and we encourage the City and the Planning Team to develop a criteria and goals-based framework of its own, built from the voices of the community, clearly articulating the principles and values upon which future planning decisions will be based.

GENERAL COMMENTS REGARDING PROCESS
We heard from several participants that the time scheduled between the initial project introduction meeting and the scoping meeting was very short, and that the timing during the holidays diminished the potential attendance of stakeholders. We recommend that the City extend the time frame for public comments, and that even greater transparency be promoted to ensure all stakeholders have ample time and ability to engage with the planning process.

SPECIFIC COMMENTS WITHIN THE FRAMEWORK OF AIA’S LIVABLE COMMUNITIES PRINCIPLES

1. Design on a Human Scale: Compact, pedestrian-friendly communities allow residents to walk to shops, services, cultural resources and jobs, while reducing traffic congestion, encouraging public transit participation and, thus, benefiting human health and awareness of one’s surroundings.
   - The areas included in the South Downtown Subarea boundary present a variety of challenges and opportunities. While the overall physical area is relatively compact, (negotiable walking distances), the linkages between districts must be enhanced for the pedestrian.
   - Such an undertaking as this Subarea plan must consider the lengthy timeframes that will be needed to realize significant development build-out. Small and medium scale development projects that take advantage of existing building stock must be promoted, “priming the pump” for more ambitious developments.
2. **Provide Choices:** Livable communities are rich in variety, providing a mix of housing, shopping, recreation, transportation, entertainment and employment. Variety creates lively neighborhoods and accommodates residents in different stages of life.

   - **Housing:** Providing a variety of housing choices is essential to creating a vibrant and sustainable downtown community. The most interesting and active neighborhoods are those that embrace a mix of income levels, ethnicities and ages. Live-Work lofts and flats developed in the existing building stock should be a priority – focusing on achievable projects that infuse people into the districts, particularly after hours.

   - **Mixed Use:** Nodes of pedestrian activity should be encouraged throughout the districts, resulting from a variety of available services, businesses and practical open space. Particular attention should be paid to the edges and transition points and accessible linkages between districts.

   - **There must be a strong focus on linkages between the various districts/neighborhoods, including connections to the Foss Waterway. Ensure that other work already completed, (such as the recent work completed for the Foss Waterway), is understood and incorporated into the Subarea planning.**

3. **Encourage Mixed-Use Development:** Integrating different land uses and varied building types creates vibrant, pedestrian friendly and diverse communities.

   - The districts contained within the South Downtown Subarea provide multiple opportunities to create mixed-use and “multi-use” developments, allowing and encouraging non-traditional business enterprises to co-exist, such as light manufacturing and other “clean” industrial uses mixed with residential and entertainment uses.

   - **The variety of existing industrial buildings throughout the South Downtown boundaries provide for a wide palette of potential mixed-use enterprises. The Subarea plan should provide prospective developers with the necessary tools and information to consider how a variety of uses can be compatible within compact blocks.**

4. **Preserve Urban Centers:** Restoring, revitalizing and infilling urban centers takes advantage of existing streets, services and buildings, helping to avoid the need for new infrastructure.

   - The districts within the Dome and Brewery Districts possess significant and unique historical character. The Existing Conditions Survey will be a highly valuable tool, and must be articulate in defining the structures of each district, particularly character-defining attributes.

   - **The unfortunate severance of the Dome District from the Brewery District as a result of the Sounder Train crossing must be considered and overcome, promoting a sense of continuity between these areas. This continuity must also consider linkages to other nearby districts and neighborhoods such as McKinley, McCarver, and the South Tacoma Way and Center Street Business areas.**

5. **Vary Transportation Options:** Giving people the option of walking, biking and using public transit, in addition to driving, reduces traffic congestion, reduces pollution and promotes physical activity.

   - The adopted South Downtown Subarea already boasts a variety of transportation options. As a truly urban environment, vehicles and people can co-exist, but with an emphasis on caring for the pedestrian by providing safe corridors that further encourage the use of public transit. Parallel
parking in lieu of angled parking on streets, and protection of the 2-way street grid should be promoted.

- Develop a detailed transportation and parking strategy that considers approaches/arrivals of vehicles to and through the districts.
- Develop a clear way-finding system that connects downtown with South Downtown, and further interconnects the South Downtown areas to each other, enhancing pedestrian and biking modes of transportation and greater city continuity.

6. **Create Vibrant Public Spaces:** Citizens need welcoming, well-defined public places to stimulate face-to-face interaction, collectively celebrate and mourn, encourage civic participation, admire public art and gather for public events.

- Within the boundaries of the adopted South Downtown Area are several opportunities to establish gathering places. Priority should be given to creating nodes of public spaces that connect groupings of structures and provide transition and linkage points as the various neighborhoods and districts interlock.

7. **Create Neighborhood Identity:** A sense of “Place” gives neighborhoods unique character, enhances the walking environment, and creates pride in the community.

- The planning area boundaries selected for the Subarea plan encompass several distinct districts and neighborhoods. The Dome District, Brewery District, and Foss Waterway each have established as well as emerging identities, and each has been the subject of extensive previous study. Care must be taken to ensure that the unique characteristics and attributes of each district are not undermined by a “one-size-fits-all” approach.
- Priority should be given to reusing and redeveloping existing building stock. (See Principle Item 4 – Preserve Urban Centers). Encourage and incentivize adaptive re-use of the empty and or underutilized building stock to attract businesses and promote development.

8. **Protect Environmental Resources:** A well-designed balance of nature and development preserves natural systems, protects waterways from pollution, reduces air pollution, and protects property values.

- The adopted boundaries of the Subarea contain and intersect with some of the Tacoma’s most important natural systems within the urban center including the Foss Waterway and the B Street gulch. Any development must respect, enhance, and embrace these natural assets.
- Stormwater management strategies should be considered district-wide, creatively incorporating natural drainage strategies that enhance the urban environment. Raingardens should not be the primary strategy if the outcome creates the look and feel of a mall or suburban environment. A mix of strategies that incorporate open space, landscaped edges, and the “nooks & crannies” of urban spaces can be successful. Other sub-surface strategies are likely inevitable to preserve the urban context.

9. **Conserve Landscapes:** Open space, farms and wildlife habitat are essential for environmental, recreational, and cultural reasons.

- This particular principle is intended to curb urban sprawl, and is inherently promoted as a result of urban infill investment in Tacoma’s downtown districts.
Further, we support the intent of the Transfer of Development Rights program, which helps to protect our rural areas and wildlife habitats by focusing development in our urban cores.

Emphasis should be placed on creating urban green space, which is vital to vibrant, desirable urban neighborhoods. As density increases in this area, (a primary goal of the plan), green space must already be established and protected, connecting and being connected by a growing mix of housing and business enterprises.

10. **Design Matters**: Design excellence reflects healthy, successful and confident communities.

- The Subarea plan must articulate and convey to the community at large, and to prospective developers, through goal-based descriptions and imagery, design that respects the existing character of the districts in scale, materiality, color, texture, and other attributes, building on the established urban fabric while also looking to the future.

- Acceptance of mediocre or poorly executed design and construction does not inspire people and diminishes the potential of future investment. The Subarea plan should be bold in articulating expectations of quality and excellence in design.

- Contemporary expressions for new structures should be encouraged, but must carefully and respectfully acknowledge existing massing and detailing, and establish a sense of permanence and quality.

In summary, AIASWW is wholly in support of efforts to create a common vision and Subarea Plan for the South Downtown Area. We look forward to continued opportunities to engage and be a partner with the City. Please contact Randy Cook, Chair, or Ko Wibowo, AIASWW President, with any questions.

Thank you,

AIA Southwest Washington Committee on Community Advocacy

---

Randy Cook, AIA, LEED AP BD+C  
Committee Chair  
253-572-3993  
randy@tcfarchitecture.com

Ko Wibowo, AIA, LEED AP  
AIASWW President  
253-383-3084  
ko.wibowo@mcgrarahan.com

Cc:  
Mayor Marilyn Strickland  
Deputy Mayor Lauren Walker  
Council Member Anders Ibsen  
Council Member Marty Campbell  
Council Member Jake Fey  
Council Member Victoria Woodards  
Council Member Joe Losergan  
Council Member Ryan Nello  
Council Member David Boe  
Interim City Manager Roy Arellano  
Ryan Petty, Director, C.E.D.  
Ruben McKnight, Historic Preservation Officer  
Jeremy Doty, Chair, Planning Commission  
AIASWW Chapter Office
Community and Economic Development Department
c/o Ian Munce
747 Market St. Room 1036
Tacoma WA 98406
re: South Downtown Subarea Scoping Process

Dear Mr. Munce:

I am writing to comment on the scoping process for the South Downtown Subarea Plan and Environmental Impact Statement. These comments are submitted on behalf of the Tacoma Catholic Worker, a community organization located on 15th Street, immediately adjacent to the area being considered. Our work includes direct services to people who are struggling to survive on the street, as well as advocacy and activism for social and economic justice.

As we plan for the long term growth of our City, our goal should be to create housing at affordability levels meeting the needs of the individuals and families who are already residents of the area, and those who will work here. This Environmental Impact Statement should take seriously the environmental impact of many working people commuting long distances in order to find housing they can afford. In so many other instances, individuals and families with fewer resources must move from one place to another, out of the way of new investment and development. This planning process should address and make plans which counter the pressures that force the poorest residents out of areas of new development. The social costs of neglecting these needs would be with us as an entire community for many years to come.

Since the entire community, through this planning process and many other incentives, are giving assistance to private corporations, it is fitting for us to be concerned about the kind of jobs these incentives bring to our community for the long term. In order to have a healthy local economy, we must offer our taxpayer supported benefits only to those who are going to bring living wage jobs to our City. By lending our support to the creation of low wage work, we are ultimately placing ever heavier pressure on our already overburdened safety net.

The Tacoma Catholic Worker looks forward to being a part of a thoughtful planning process for the growth and increased density of our neighborhood and our City. We believe it is critically important and beneficial for this process to include the interests and voices of those who look to bring new businesses to the area, as well as the residents (both housed and homeless) who already call this neighborhood their home.

Thank you for your work toward the growth and improvement of our City.

Sincerely,
The Tacoma Catholic Worker, Guadalupe House of Hospitality
Nora Leider, Micheal Sterbick, Harlan Landon, Peter Roderick, and Mark Votava
1417 South Street
Tacoma WA 98405
January 10, 2012

Mr. Ian Munce  
Urban Planner, Long Range Planning Division  
City of Tacoma  
Community and Economic Development Department  
747 Market Street, Room 1036  
Tacoma, WA 98402

Dear Mr. Munce:

I am writing to submit comments to the South Downtown Subarea Plan Public Scoping Process from Catholic Community Services, the faith-based, non-profit arm of the Catholic Church in Western Washington, providing a broad range of housing and human services to people in need since the 1920’s. CCS has both the discreet interest of a property owner and the broader interest of a community institution committed to the health and vitality of the lives of all of people in our community, with special interest in speaking out on behalf of our poor and vulnerable citizens.

As owner of the property at 2304 South Jefferson Avenue, CCS would be very concerned by any decision, action, or lack of action on the part of the City of Tacoma that would limit our rights and ability to provide services to homeless individuals as currently configured or any other service which follows from the pursuit of our mission.

Catholic Community Services supports the City of Tacoma’s commitment to promote the health, welfare, safety, and quality of life for all of its residents, which the City lays out in detail in its Comprehensive Plan. CCS is aware of the City’s binding commitment to plan for the needs of all of its residents, including the needs of individuals and families experiencing homelessness. This responsibility has been underscored during this great recession when we all are facing the most challenging economic realities in many decades.

Chapter 4 of the City’s Comprehensive Plan puts forth the goal of maintaining and supporting vibrant and stable residential communities “while promoting a variety of housing opportunities to meet the needs of all members of the community.” The City’s plan also recognizes that affordable housing includes a continuum that “extends from basic emergency shelter for the homeless, to temporary transitional housing, to permanent rental housing, and for some households to home ownership,” and that “each segment of this continuum requires ongoing financial support for both public agencies and individuals.”
Catholic Community Services supports both this goal and the specific policies detailed in the Housing Affordability section of the chapter: support for Affordable Housing Supply (H-HA-1), Home Ownership (H-HA-2), Public-Private Partnership (H-HA-3), and Special Needs Housing/Supportive Services (H-HA-4). We look forward to meaningful inclusion of these policies in the Subarea Plan as well as the scope of the EIS plan sections representing all parts of the City.

Finally, we ask that you consider including in the scope of the South Downtown Subarea Plan the tools listed in the Puget Sound Regional Council’s “Complete Housing Toolkit” (http://psrc.org/growth/hip/alltools/).

Thank you and all of the City staff in your dedication to this important planning process.

Sincerely,

Denny Hult Hansen
Southwest Agency Director
Catholic Community Services
December 21, 2011

City of Tacoma
South Downtown Subarea Plan & EIS
Attn: Ian Munce
747 Market Street, Room 1036
Tacoma, WA. 98402

Hello Ian:

The Puget Creek Restoration Society (PCRS) protects, enhances and restores the Puget Creek Watershed and similar streams, wetlands and green spaces. We serve the South Puget Sound communities and invite their participation through hands-on restoration, research, education, advocacy, and by promoting a sense of stewardship.

Our organization represents over 3,000 members and volunteers located in the City of Tacoma/Pierce County and who are deeply concerned with wetland, stream, green space and nearshore issues in the City.

Thank you for allowing us to provide input into this plan. This is in regards to the proposed Downtown Subarea Plan. We request the following conditions be incorporated into the plan and response to our questions be developed:

- We request a hard copy version of the draft EIS and all other documents associated with this plan.
- We feel that the use of Native Evergreen and Deciduous trees along with native shrubs and groundcover plant material should have a mandatory use component for all landscaping work in this plans area.
- Also a mandatory use of all or pertinent Low Impact Development scenarios be applied to this plan such as: rain gardens; pervious pavement; green roofs; and other LID processes.
- The inclusion of the use of container gardens and roof top gardens along with container native plant gardens etc.
- All stormwater from this plan’s area should have a mandatory filtering process before it is allowed to flow into the Bay or other receiving waters.
- How is the additional light and heat from new proposed structures going to be mitigated?
Without further clarification of the impact that the project has on the natural systems, the Puget Creek Restoration Society cannot support this project; however, if the plan were to incorporate our comments, questions and concerns on this plan we would reconsider our position. We would like a response to these comments.

I write as an officer of the Board of Directors of Puget Creek Restoration Society, which has evaluated the proposed project. We will appreciate your office’s full consideration of our position, and we look forward to working with you in making Tacoma a better place for everyone.

Thank you for your consideration in this matter. You can reach us at (253) 779-8890 if you have any questions.

Sincerely,

Scott M. Hansen-B.S., M.A., M. S., (Ph.D.-student)
Ecologist/Treasurer Board of Directors
SEPA Environmental Officer Mr. Ian Munce, JD, AICP
Tacoma Municipal Building, CEDD
City of Tacoma
747 Market Street, Room 1036
Tacoma, WA 98402

January 10, 2012

We are submitting the below Comments from Jobs with Justice on EIS Scoping of South Downtown Subarea Plan as well as us individually. Please contact us at the below info if you have any questions or concerns if the documents did not come across completely or you’ve had any problems accessing or opening the information in the files.

Please send us confirmation that you received this email. Thank you

Sincerely,
Washington State Jobs with Justice (JwJ) and its members represent scores of members living and working within the impacted community and hundreds of members in surrounding communities.

The City is embarking on a massive project to inject at least 30,000 new jobs and 30,000 new residents into Downtown over the next 20 years. This step should not be rushed, but rather studied comparatively and inclusively within the Environmental Impact Statement (EIS) process.

The City has determined that this plan may have “significant adverse impacts” which should be studied and alternatives should be explored to mitigate these adverse impacts.

**Comparative Study of Development Models**

A comparative study should be adopted measuring the extent to which diverse development models achieve the legislated environmental goals of SEPA, GMA, Tacoma and Pierce County’s Comprehensive Plans, and the PSRC’s Vision 2040. These goals such as urban density, commuter reduction, mass transit, effective public services, sustainable mixed land use, and protection of our natural world and beauty should be studied in the context of City of Tacoma policies on and realities of jobs, housing, taxes, health and safety, and democratically accountable government. For SEPA requires a study of alternatives and allows for comparing factors beyond the mere physical manifestation of potential workplaces, homes and other human uses. SEPA also requires a study of people and behaviors influenced by these workplaces, homes and other human uses.

The City should study Downtown Tacoma environmental impacts using at least two differing development models. Impacts of major urban development diverge drastically depending on policies that the City chooses to “catalyze” private investment. Given that Tacoma’s recent development model has collapsed and stalled and different models have proved more sustainable, resilient, and effective in other cities and nationally, it is likely that the City Council and Tacoma residents would prefer a comparative Environmental Impact Statement (EIS) to inform future policy decisions.

Below is a chart that outlines two distinctly different models of development.

The impacts on our environment are likely to be dramatically different depending on the model or blend chosen by the City Council. For example, the City should study when Tacoma workers have the economic option to reside within a walk of their job, how does that impact commuter reduction, public health and safety, natural world protection, and urban density? How much does living-wage jobs contribute to the tax base for public services compared to poverty-wage jobs draining revenues from the City safety net? When Tacoma residents have the tools to hold governments and corporations accountable to social promises, how does that improve natural world enjoyment?
This EIS is also a planning tool that continues the radical transformation of Downtown and Hilltop sections of Tacoma, capitalizing on government subsidies and tremendous views. To properly plan and assess future impacts, the first 20 years of this transformation should also be evaluated in light of legislated environmental goals.

For example, the City should study how has 20 years of City-catalyzed Downtown development impacted local chronic high unemployment and public services? How has City-catalyzed job and housing creation or loss impacted commuter reduction, natural world protection, and urban density? How has City land use policy that subsidizes Wall Street firms and luxury condos impacted public safety and other services, health, and mass transit? Has the City's Thea Foss Waterway and Downtown “Renaissance” expanded natural world enjoyment for Tacoma residents compared to other projects potentially garnering equal public investment?

Jobs with Justice suggestions of the “alternative model” that the City should study in comparison to current model when defining topics for SEPA study. Many policies in this alternative model have already been implemented in US cities similar to Tacoma or other government agencies.

<table>
<thead>
<tr>
<th>Categories</th>
<th>Recent Model</th>
<th>Alternative Model - Justice</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Socialized Benefits</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Infrastructure for commerce and development boom</td>
<td>Paid by taxpayers</td>
<td>Paid by taxpayers progressively</td>
</tr>
<tr>
<td>Land Use Planning</td>
<td>Fully paid by taxpayers under City’s non-project EIS</td>
<td>Cost shared by taxpayers and developers who benefit</td>
</tr>
<tr>
<td>Business subsidies &amp; tax breaks</td>
<td>Over $1B unconditionally paid by taxpayers</td>
<td>$$?? Conditionally paid by taxpayers in exchange for community benefit</td>
</tr>
<tr>
<td><strong>Jobs</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Quality</td>
<td>Bosses decide (aka “market-driven”)</td>
<td>Family Wage (Vision 2040 p74) Worker Civil Liberties</td>
</tr>
<tr>
<td>Access</td>
<td>Bosses decide except HUB/LEAP in government funded construction</td>
<td>Local Hire component for post-construction jobs</td>
</tr>
<tr>
<td>Training</td>
<td>Bosses decide except for LEAP in government funded construction</td>
<td>On-the-job program includes LEAP standards for post-construction jobs</td>
</tr>
<tr>
<td>Bosses</td>
<td>Developers decide (aka “market-driven”) or lowest bidder</td>
<td>Responsible Business standard includes banning law violators and promise breakers from future public benefit</td>
</tr>
<tr>
<td><strong>Housing</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Access</td>
<td>“Market rate” luxury, some</td>
<td>Affordable (p17) to mixed</td>
</tr>
<tr>
<td>Community Retention</td>
<td>Displacement of low-income residents</td>
<td>Current Resident first option for mixed income units</td>
</tr>
<tr>
<td>---------------------</td>
<td>-------------------------------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>Community Protections</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Advance Transparency</td>
<td>Not for public/private projects</td>
<td>6 months notice from concept</td>
</tr>
<tr>
<td>Enforceability</td>
<td>Dependent on city officials</td>
<td>Community has right of action (PROA)</td>
</tr>
<tr>
<td>Reporting and Clawbacks</td>
<td>None</td>
<td>Track outcomes (especially jobs &amp; housing) per City CEDD’s goal. Require violating companies to repay taxpayers</td>
</tr>
<tr>
<td>Question that development strategy is trying to answer</td>
<td>When economy recovers, how do we catalyze private lending (and debt) and investment?</td>
<td>How do we help economy recover sustainably and prevent another toxic debt collapse?</td>
</tr>
<tr>
<td>Values</td>
<td>measured by elite profit-taking and consumption</td>
<td>measured by entire community benefit (Vision 2040)</td>
</tr>
</tbody>
</table>

Jobs with Justice is concerned that lead agency City of Tacoma CEDD, in publications and presentations, has indicated a bias to study only Tacoma’s recent failed model of development. The 5 published (page 3) planning topics suggested by the City are: “The plan will:

- Identify and prioritize necessary infrastructure improvements
- Plan for parks, trails and open space
- Prioritize transportation investments
- Develop potential funding strategies
- Pre-approve up to 30 million square feet of new development space”

While the first 4 of these topics are important, they do not fully address sustainability needs of the surrounding impacted communities as defined by Vision 2040. These needs also have a direct impact on the planning of the 5 listed topics. For example, effective "transportation investments" are related to housing affordability and job quality because the two most important factors on which residents make transit decisions are home and job locations. In addition, these topics do not include stated City goals such as a study to avoid resident displacement and achieve Vision 2040 sustainability goals.

Rather than expound and integrate job and residential planning at the pre-scoping community meeting, the City prioritized the fourth bullet to “develop potential funding strategies” using public funds to incent corporate investment. If the City does not act affirmatively on jobs and housing, it
will by default continue to cede control over job, housing, and other sustainability issues to private corporations. The City indicated it had no concrete plans to advance regarding housing affordability and job quality.

**Environmental Parameters and Development Alternatives Factors Should Include Jobs**

As the City has already embraced “social justice” parameters such as “housing” and “environmental health” (Scoping Notice page 5), it is unclear why the City has excluded “jobs” from the list of study topics that includes “Earth, Air Quality (greenhouse gas emissions), Water; Plants and Animals, Environmental Health (contamination and hazardous materials), Noise, Land Use (adjacent land uses and consistency with plans, policies and regulations), Population and Housing, Historic and Cultural Resources, Aesthetics, Transportation and Circulation and Parking, Public Utilities, and Public Services.” For reasons already stated in this comment, jobs are integrally related to most of these other environmental topics.

The City acknowledges that jobs are a significant factor in environmental impacts by signing the Growing Transit Communities Consortium Agreement (GTCCA) to fund this EIS process. In Task C2, the City claims “it is estimated that for every 10,000 new jobs added to downtown Tacoma over the next 10-15 years, approximately half will result in shorter commutes from nearby neighborhoods. These shorter commutes result in cost savings result in cost savings associated with reduced vehicle operations and emissions, less congestion externalities and fewer accident risks. Taken together, these cost savings (discounted to present values) are in excess of $20 million.” It would benefit City decision-making for the EIS to explore alternatives that employ similar quantifying rigor and methodology to not only job numbers but also job quality.

While the City also recognizes that the EIS will analyze several development alternatives “based on variations of such factors as transportation, utilities, development phasing, and/or” land uses, it is unclear why the City has excluded “different mixes of” jobs and housing from the list of study alternatives. Again, for reasons already stated in this comment, jobs are integrally related to most of these other environmental factors.

*Jobs with Justice also offered verbal public comment at the December 15 Scoping Meeting. The following is the written version of this comment:*

The City Needs to Study Jobs and how the City’s Plan for Jobs impacts and relates to the EIS Topics

The City is planning to radically transform Downtown by generating 30,000 new jobs and homes for 30,000 new residents by 2030. This could be a great thing.

The City plans to study topics such as Air Quality, Environmental Health, Land Use, Population and Housing, Transportation and Circulation and Parking, Public Services, and others

At the last and final City community meeting before this formal process started on December 5, the City presented a model of development that had taxpayers funding incentives for private developers but left the most important decisions about the 30,000 jobs entirely in the hands of these private developers. This is the jobs and development model that the City has used in the last 2 decades.

30,000 jobs and what will they look like is the elephant in the room that the City needs to speak to, to study, and to compare different models relating differently to all of the other topics in this EIS process. This is the current disconnect.
The jobs and development model that the City has used in the last 2 decades has not worked as well as it could have when we consider the EIS topics such as Air Quality, Environmental Health, Land Use, Population and Housing, Transportation and Circulation and Parking, Public Services.

Will the City measure and quantify the impact of the jobs lost and created from the City’s 2 decades of development on these environmental topics?

As members of this community, we know and see this impact. What is this impact that the City needs to study?

We see continued record unemployment in downtown and surrounding communities. This nation is experiencing what this community has experienced for decades even during the “Tacoma boom years.” But even in these national bust years, you have to go to California to find higher unemployment rates than here.

We see that East Tacoma has the highest home foreclosure rate in the state. When Hilltop luxury condos push out low-income residents to East Tacoma and then almost entire blocks of homes are shuttered, it is misleading to deem this “infill of blighted areas.” Jobs and environment are connected in this shell game.

It is poverty wage workers who built those luxury condos on the Foss, make those beds at the Marriott Hotel on Pacific, and clean the toilets at Columbia Bank but have to green-house gas commute to Sumner to find affordable rental homes or chase the American dream with Tacoma’s busted high-risk mortgages.

Jobs and environment are connected.

It is undocumented immigrant workers who clean Tacoma’s toxic waste sites but have no meaningful whistleblower protections to oversee their or neighboring residents’ safety. This is especially poignant when the City is not only lax on environmental health enforcement but actively works with federal Homeland Security to intimidate workers into silence and to union-bust into denying a fair grievance process.

Jobs and environment are connected.

It is economy contributing union workers who the City is driving out of downtown’s shrinking population and economy because City strategy leads it to unconditionally let a downtown grocery developer reward a union-buster with City taxpayer subsidies.

Jobs and environment are connected.

It is barely middle class workers who now scramble to maintain their standard of living at the City’s recently adopted growth industry, urban sprawl Big Box discount stores like Wal-Mart.

Jobs and environment are connected.

Shuttered storefronts, large buildings halted mid-construction, mega-bankruptcy sales on the steps of the City-County building, cuts to public safety and park staffing, miles of Big Box discount store parking lots, exploding homeless urban camping, vacant and vacuous urban villages like the Thea Foss are the ripples from a failed downtown luxury village strategy and its connected low-wage job strategy, strategies that made a bubble that contributed to the national bubble that popped and made an environmental mess in our backyard.
The study of environment needs to be integrated with the study of jobs.

We have an opportunity through this EIS to learn from the City’s failed luxury model and compare it to other more sustainable models that many other Cities have pioneered. These other more sustainable models share the design of new jobs with community organizations, residents, elected governments, and private developers. It’s not only more environmentally and economically sustainable, it’s also more fair to the majority of taxpayers since we as taxpayers are investing so much.

**Formal Process Should Restart More Inclusively**

In addition to the City’s EIS study topics, factors, parameters, and methodology, we have several concerns about the legitimacy of the City’s process. There are fatal flaws as enumerated below and the City should correct this process by suspending the formal EIS process, bringing the “public participation” train back to the station for more inclusive and meaningful engagement, and extending the scoping comment deadline to preserve the legal rights of diverse community members excluded from the City’s earlier engagement with traditionally and narrowly selected privileged stakeholders.

Once the City mailed the official EIS scoping notice on December 5, 2011, the City launched a linear process that narrows City study topics and eliminates legal rights to hold government accountable to address public participation. This elimination step is certainly not early in the planning process. Yet, Resolution 38227 committed the City to meaningfully engage workers, low income residents, and local justice organizations in the early planning process.

As of this late date in the City planning process, we have no confidence that the City has engaged “communities that have been traditionally disconnected from development decision-making…” by “developing new partnerships between [these] communities…” to “confront the environmental justice needs of marginalized/disadvantaged communities.”

Nor do we have confidence that the City is poised to comply with the spirit of the “2010 Washington State Law that: mandates expanded public participation for the area-wide planning... and mandates that the sub-area plan act affirmatively to avoid displacement...of existing... residents and/or cultural groups.” These are some the commitments that the City made to the federal government and the Puget Sound Regional Council (PSRC) when it accepted a half-million dollar tax-funded grant by Resolution 38227. We are awaiting public disclosure of City documents for more details, but a preliminary investigation has determined that this is not the case.

The lack of meaningful City initiated public engagement is compounded by the Growing Transit Communities Consortium Equity Network Steering Committee’s failure to organize a meaningful local Regional Equity Network as planned from June to November 2011. Had such a Network been operating by November, “community-based organizations” would have been “linked” to “build capacity of community leaders to participate... and to define equitable development needs” to “advance social equity” in growing “all peoples’ (regardless of where they live, their race, background, or income) access to affordable, quality housing and transportation options that meet their needs... access to good jobs, quality education, healthy food, safe neighborhoods, parks, services, and other resources that improve quality of life.” No such linking or advancing has occurred to date in communities impacted by the Downtown plan. Rather, the opposite appears to be occurring.
At the recent last and final community outreach meeting prior to the formal Downtown planning process started on December 5, City officials responded to our concerns stating “we are starting that outreach and having those conversations now.” Selectively making a few 11th hour presentations, one on the Thanksgiving Saturday before the final community meeting and a few others well after the December deadline clock started ticking, is not meaningful for low-income communities in the most hectic month of the year. Task C2.2 of the GTCCA required the City to “conduct public meetings to establish the scope of the EIS” in October 2011, a month far less jammed than December for communities struggling with poverty and economic injustice.

Equally disturbing are reports that the City is verbally characterizing the linear EIS elimination process as “iterative” and “still very early” to communities not traditionally engaged in land use planning. Organizations that democratically and genuinely represent low-income and “marginalized” communities and “have been working on a number of equity issues in their neighborhoods for years” have been misled to believe there is no urgency to comment and no consequence for failing to comment during the Scoping process. The City’s message and approach to marginalized communities is completely opposite to its message and approach to the investor and business community over the last six months. If the City is blocking civic participation in project-by-project decision-making by using this 2010 Law, then it should invest in engaging low-income residents and workers, “marginalized/disadvantaged communities,” justice organizations, labor unions, and religious groups at least as equally as it has the investor and business community over the last six months. This is the baseline mandate of Vision 2040 that the City embraced when accepting the grant.

Amidst the double standard in outreach is some confusion regarding the scope of this project. At the recent last and final community outreach meeting prior to the formal Downtown planning process started on December 5, City officials stated that the geographic boundaries of the South Downtown Subarea under this EIS process now encompassed all of the Thea Foss Waterway because the “[FWDA Executive Director] has just twisted our arm to include it” Yet, the scoping notice documents do not reflect this extension beyond the 15th St boundary. Also, recent verbal descriptions of the boundaries also set Tacoma Ave and 17th St as opposed to current published boundaries of Yakima Ave and 15th St. We request clarity and, if such a change has been made, re-noticing with proper boundaries. Such a moving target in boundaries must have also impacted whatever minimal community outreach the City was conducting.

The train has now left the station without the City delivering on its grant commitments and Resolution 38227. After the most hectic month of the year, official comment has closed to determine topics of study on the plan to radically transform Downtown and residents may lose rights to contest the direction of the City’s plan.
Dear City Council, City Manager Arellano (authorized representative to Growing Transit Communities grant), CEDD Director Ryan Petty (supervisor of grant funded engagement),

Resolution 38227 commits the City to meaningfully engage workers, low income residents, and local justice organizations in your ear’y planning to radically transform Downtown by generating 30,000 new jobs and homes for 30,000 new residents by 2030.

As of this late date in the City planning process, we have no confidence that the City has engaged “communities that have been traditionally disconnected from development decision-making…” by “developing new partnerships between [these] communities…” to “confront the environmental justice needs of marginalized/disadvantaged communities.” Nor do we have confidence that the City is complying with the spirit of the “2010 Washington State Law that mandates expanded public participation for the area-wide planning... and mandates that the sub-area plan act affirmatively to avoid displacement... of existing... residents and/or cultural groups.” These are some of the commitments that the City made to HUD and the Puget Sound Regional Council when the City in writing accepted a half-million dollar tax-funded grant.

If the City is blocking civic participation in project-by-project decision-making by using this 2010 Law, then it should invest in engaging low-income residents and workers, “marginalized/disadvantaged communities,” justice organizations, labor unions, and religious groups at least as equally as it has the investor and business community over the last six months. This is the baseline mandate of Vision 2040 that the City embraced when accepting the grant. A preliminary investigation has determined that this is not the case.

At the recent last and final community outreach meeting prior to the formal Downtown planning process started on December 5, City officials responded to our concerns stating “we are starting that outreach and having those conversations now.” Selectively making a few 11th hour presentations, one on a Thanksgiving Saturday before the final community meeting, is not meaningful engagement for low-income communities in this hectic month.

The train has now left the station without the City delivering on its grant commitments and Resolution 38227. In less than one month, official comment closes to determine topics of study on the plan to radically transform Downtown and residents may lose rights to contest the direction of the City’s plan.

We ask that you bring the train back to the station and engage the community inclusively and meaningfully. Inclusive public engagement means:

1. also including groups such as labor unions, churches, civil rights groups, and other justice organizations as well as those that have fought the City evictions of low-income residents homes and services in and near downtown.
2. also helping form new partnerships between these groups by running workshops with us as the City did with the investors and business community
3. Suspending the formal land use planning process so that the rest of us can catch up and lend our voices. Short of this step, the City, on January 10, will cut off the rights of the very communities the City claims to be engaging, and preventing us to contest the publicly expressed bias of an unelected City official.
Wendy Hall, WA State JwJ Co-chair and Pierce County Organizing Committee Co-chair
Adam Hoyt, WA State JwJ Secretary and Pierce County Organizing Committee Co-chair
Nora Leider, WA State JwJ Faith Rep to Board
Jacob Carton, staff organizer
City of Tacoma

August 17, 2010
Mayor Marilyn Strickland

Mr. Bob Drewel
Executive Director
PSRC
1011 Western Avenue, Suite 500
Seattle, WA 98104

RE: Commitment to the Central Puget Sound Sustainable Communities Consortium

Dear Mr. Drewel:

The City of Tacoma is pleased and delighted to be selected to undertake one of the catalyst projects included in your application to HUD under their regional sustainable communities grant program. The State Growth Management Act, PSRC’s VISION 2040, and the City’s Comprehensive Plan all work together towards achieving the livability principles of Sustainable Communities. The proposed program in your grant application focuses on the additional resources necessary to develop common agreements on corridor action strategies that will shift the region nearer to implementation of our shared vision.

We fully understand the need to work as part of the Central Puget Sound Sustainable Communities Consortium to cooperatively carry out the program in the grant application and commit to this effort without reservation. Further, the City authorizes PSRC to be the lead applicant and to act in a representative capacity with HUD on behalf of all members of the Consortium and to assume administrative responsibility for ensuring that the Consortium’s program is carried out in compliance with all HUD requirements. Finally, we understand that a formal consortium agreement - describing each consortium member's specific activities under the program, including timetables for completion – will be executed no later than 120 days after the effective start date of the grant agreement.

For PSRC to meet the goals for resource protection, climate change, smart growth, and sustainability set forth in VISION 2040, the City of Tacoma must absorb approximately 8% of the central Puget Sound region’s population and employment growth. Much of this growth can be accommodated in a revitalized Downtown Tacoma: 60,000 jobs and 70,000 people by 2030. Our catalyst project seeks to facilitate Downtown Tacoma’s revitalization by undertaking sub-area planning using a 2010 Washington State law that:

747 Market Street, Room 1200, Tacoma, Washington 98402-3766, (253) 594-7848, FAX (253) 591-5123
(1) authorizes area-wide identification of environmental impacts accompanied by a system that provides for proportional, substantive mitigation for adverse environmental impacts; (2) mandates expanded public participation for the area-wide planning and eliminates project-by-project environmental appeals; (3) mandates that the sub-area plan act affirmatively to avoid displacement or fragmentation of existing businesses, residents, and/or cultural groups; and, (4) requires innovative approaches to achieve the State's statutory goal of reducing greenhouse gas (GHG) emissions to 1990 levels by 2020. Specifically, our catalyst project will address the procedural and substantive requirements involved in pre-approving 50 million net square feet of new floor space in Downtown Tacoma in such a manner that project-by-project public review and appeals will be foregone.

We intend to demonstrate that this innovative approach can be a useful one with regional and, national applicability. The proposal will advance a more equitable distribution of transit-oriented communities by developing new partnerships between communities that have traditionally been disconnected from development decision making, affordable housing advocates, developers, employers, other governmental agencies and community development organizations. We will open up economic opportunity and confront the environmental justice needs of marginalized/disadvantaged communities before problems become more pronounced.

I can, without hesitation, assure you that the City has the organizational capacity to undertake and complete our part of this local and regional initiative. To date we have committed $150,000 in direct staff support but expect to leverage additional support from across our entire network of City departments, other public entities, and community volunteers for this groundbreaking regional initiative.

Thank you for your leadership.

Sincerely,

Marilyn Strickland
Mayor
RESOLUTION NO. ________________

A RESOLUTION relating to public/private partnerships and development agreements; directing the Department of Community and Economic Development to give notice to interested parties of public/private partnership development agreement proposals 180 days in advance of any Council vote on such development agreement, failing in which the Council will not vote on the matter until 180 days has passed from the time such notice is given.

WHEREAS significant taxdollars have been invested in City of Tacoma public/private partnerships; and

WHEREAS many community members are unaware whether public/private partnerships have contributed to the development of the City of Tacoma in significant and beneficial ways; and

WHEREAS public/private partnerships have the potential to further the development aims of the City in future projects; and

WHEREAS the Council believes that community input into the creation of public/private partnership development agreements will serve to further community benefits in meeting needs such as living wage jobs, workforce housing, career training, job opportunity access, fair taxing and spending, free speech rights in the workplace, and community health and safety.

WHEREAS the Council desires to maximize the transparency of the process by which public/private development agreements are created; and

WHEREAS the Council desires to provide input to interested parties as the public-private partnership agreements are formulated, and before such time as they are brought to a vote on approval; and

WHEREAS the Council recognizes the feasibility of developing an interested parties list capable of e-mail notification to such interested parties when public-private partnership development proposals are made, due to the present use of such lists by the City of Tacoma and by Pierce County governments; now, Therefore,

BE IT RESOLVED BY THE COUNCIL OF THE CITY OF TACOMA:

That the Department of Community and Economic development is hereby directed to set up and maintain an e-mail list of parties interested in the formulation of public/private partnership development plans, and to give notice of such plans to all parties who indicate an interest therein at least 180 days before the development agreement is presented for a vote to the Council, failing in which the Council will not vote on the development agreement until at least
180 days has passed from the notice being so given.

Adopted

Mayor

Attest:

City Clerk

Approved as to form:

Deputy City Attorney

Definitions
To activate these notification rights, any development agreement would need to involve a public investment of $50,000 or more.
In view of the fact that the proposal may have been changed since notice was given, the Council will consider the proposal upon which a vote is sought to be substantially similar to the proposal for which notice was given if the following standards are met: 1) the private partner(s) remain(s) the same as the proposal for which notice was given; 2) the property uses (e.g. retail, manufacturing, office, residential, medical, transport, light industry trades) remain at least 90% the same in terms of budgeted value; and 3) the project property has not changed by more than 50% in value or size.
January 10, 2012

City of Tacoma
South Downtown Subarea Plan & EIS
Attn: Ian Munce
747 Market Street, Room 1036
Tacoma, WA 98402

Dear Mr. Munce,

Thank you for the opportunity to comment on the South Downtown Subarea Plan & EIS.

Downtown On the Go is the transportation resource and advocate for downtown Tacoma. Our Board of Directors represents twenty downtown businesses, organizations, and agencies, and the approximately 30,000 employees and more than 3,500 students that commute to downtown Tacoma on a daily basis. Working with our partners at the City of Tacoma, Pierce Transit and the Tacoma-Pierce County Chamber, Downtown On the Go’s goal is to reduce the downtown drive alone rate by 11 percent by 2015.

We would like to voice our support for a variety of transportation options to be included in the South Downtown Subarea Plan. Transportation is a vital element to the success of this plan. We can create amazing buildings and attract large, viable businesses but if we don’t think about developing facilities for pedestrians, bicycles and transit, we not only congest traffic for all drivers but create spaces where people do not want to reside, work or play. Having options for all modes will not only improve the flow of traffic, but create a more vibrant area that residents, business owners, shoppers and visitors want to be a part of.

In addition to building transportation infrastructure for all modes, we encourage you to include transportation demand management (TDM) plans in this project. By either including a TDM plan into the South Downtown Subarea Plan or requiring new development to include TDM plans into their projects, it ensures that those that use the area know about available resources or that transportation investments such as bike racks and free carpool/vanpool parking are not underutilized. This will ensure that the South Downtown Subarea has a positive impact on the city’s overall goals for commute trip reduction and carbon reductions, and that it becomes a destination for people in Tacoma and all over the region.

Thank you again for the opportunity to comment. We look forward to continuing to working with you on this important project for downtown.

Sincerely,

Kristina Walker
Downtown On the Go Manager
Tacoma-Pierce County Chamber
Downtown: On the Go! Board of Directors

Executive Committee
Judi Hyman, Downtown Merchants Group & TWOKOI Restaurant
Patti Sutton, Propel Insurance
Chris Green, Economic Development Board of Tacoma-Pierce County
Rachel Smith, Sound Transit

Dominic Accetturo, Kidder Mathews
Ana Grover-Barnes, DaVita, Inc.
Charles Bowers, Group Health - Tacoma Medical Center
Karen Burger, Downtown resident
Jennifer Burley, University of Washington Tacoma
Pat Forza, CH2M Hill
Steve Kallberg, Franciscan Health System
Laura Kinney, MultiCare Health System
Natalie McNair-Huff, TrueBlue
Scott Morris, Pierce Transit
Tom O’Connor, O’Connor and Associates
Shannon Payton, BLRB architects
Kat St. Pierre, Columbia Bank
David Schrodel, Tacoma-Pierce County Chamber
Bruce Stirling, GeoEngineers
Dan Voelpel, Tacoma Public Schools
Diane Wiatr, City of Tacoma
January 9, 2012

To: Ian Munce
    Chelsea Levy

From: IERE (Rita Schenck, Colleen Hall Barta)

Re: Tacoma South Downtown Subarea Plan & EIS

The City of Tacoma, a Growing Transit Communities grantee, has been identified as a key area for development around the concept of electric mobility. The Tacoma Dome Station is currently the base for all modes of transportation for the Downtown area, but does not have the capacity to serve the growing needs of the community or address the desire for alternative forms of mobility.

Neighboring Tacoma is Joint Base Lewis-McCord (JBLM), the third largest Military Installation in the U.S. The stretch of I-5 adjacent to the base is often grid-locked with severe traffic congestion and DOD is exploring electric mobility as a solution.

To the south of JBLM is Olympia/Thurston County, another program grantee that is also exploring electric mobility solutions. As a result, IERE, along with The Center for Advanced Transportation Solutions, is proposing an Electric Mobility Demonstration Project, for Tacoma, JBLM and Thurston County.

The project features full-service Electric Mobility HUBS in these three communities. Data is currently being collected for a white paper outlining the project. Life Cycle studies will be conducted as a key function of this transferable, scale model for electric mobility.

The expansion of the Tacoma Dome Station into a true mobility HUB will require an additional parking structure with charging stations, anchored by space for retail and includes a housing component. The area wide EIS will make this expansion project very attractive to developers and leverage State and Federal funds available for capital projects.
The project is also aligned with the goals and objectives set forth by The West Coast Green Highway initiative and the "Growing Transit Communities: A Corridor Action Strategy for the Central Puget Sound Region".

We ask that this Electric Mobility Demonstration Project be included in the scoping document for South Downtown Subarea Plan & EIS.
Yacker, Noah

From: Munce, Ian  
Sent: Tuesday, January 31, 2012 9:10 AM  
To: Yacker, Noah  
Subject: FW: Dome / Brewery Subarea Plan & EIS Scoping Comments - Climate Solutions  

Follow Up Flag: Follow up  
Flag Status: Flagged  

Please add to scoping comments if not already included.

From: Boudet, Brian On Behalf Of Planning  
Sent: Monday, January 30, 2012 5:27 PM  
To: Munce, Ian  
Subject: FW: Dome / Brewery Subarea Plan & EIS Scoping Comments - Climate Solutions  

FYI, looks like this one came into the Planning inbox but wasn't forwarded yet... just in case you did not already see it.

BRIAN BOUDET  
Urban Planner  
City of Tacoma, Washington  
747 Market Street, Room 1036  
Tacoma, WA 98402  
v: 253.573.2389  
f: 253.591.2002  
bboudet@ci.tacomawash.org  
www.cityoftacoma.org  
www.cityofdestiny.com

From: Chris Bast [mailto:chris@climatesolutions.org]  
Sent: Thursday, January 12, 2012 11:32 AM  
To: Planning  
Cc: Lynett, Kristin; Ross Macfarlane  
Subject: Dome / Brewery Subarea Plan & EIS Scoping Comments - Climate Solutions  

Thank you for the opportunity to provide comments during the public scoping process for the pre-development environmental review that will identify how to address environmental and community issues regarding a long-range plan for the south end of downtown Tacoma.
As part of the review of the associated projects within the Dome/Brewery Subarea plan we believe that it is important for the City to look at and evaluate the effects of the proposed Gateway Pacific Terminal (GPT) coal export facility at Cherry Point, north of the city of Bellingham. The proposal to ship up to 48 million tons of coal annually from a marine terminal at Cherry Point will result in up to 20 additional 1 ½ mile long trains per day on the main rail line through Tacoma. This increase in rail traffic may create significant impacts within the Subarea due to the associated coal dust, diesel emissions, traffic, noise and water pollution.

Although the formal scoping and EIS for the GPT project has not yet begun, there is available information suggesting that the project may create significant adverse impacts within the Subarea. The potential impacts from the significant increases in the volume of coal trains include concerns relating to:

1. **Public health.**[1] Whatcom Docs, a group of 160 Whatcom County physicians identified diesel particulate matter, coal dust, noise exposure and delayed emergency response times as some of the major concerns regarding this proposed project. In addition, pulmonary, cardiac, cancer and safety risks would increase for the local community, with children and the elderly at highest risk.

   Diesel particulate matter, nose pollution, and coal dust are associated with impaired pulmonary development, increased mortality, measurable pulmonary inflammation, increased severity and frequency of asthma-related issues, increased rates of heart attack, increased cancer and stroke risk, chronic bronchitis, emphysema, pulmonary fibrosis, and cognitive impairment in children.

2. **Air quality.**[2] The concerns relating to increased diesel particulates from the substantial increases in coal traffic are particularly important for the Dome/Brewery Subarea because of the existence of the Tacoma Tidflats PM 2.5 nonattainment area.

   As is expressed by the existence of the nonattainment area, Puget Sound is in particular danger from diesel air pollution. According to the Whatcom Docs group, a recent study from the National-Scale Air Toxics Assessment released by the EPA states that, “the Puget Sound region ranks in the country’s top five percent of risk for exposure to toxic air pollution.” A study in 2010 by the Puget Sound Clean Air Agency and the University of Washington showed that, “Diesel emissions remain the largest contributor to potential cancer risk in the Puget Sound area.”

Available information also suggests that there may be significant increases to **traffic congestion**[3], noise, and **water**[4] quality.

We hope that the City will evaluate these issues and the effect of the coal export proposal on Tacoma’s plans for the Dome/Brewery subarea. **We also urge the City to participate in and submit comments on the GPT EIS once the scoping for that project is initiated later this year.** Participating in this process will help ensure that Tacoma’s environmental and economic interests are considered in light of the development plans to which this scoping process is directed.

Sincerely,
Ross Macfarlane, Senior Advisor
Chris Bast, Business Partnerships Associate

---

Chris Bast  
*Business Partnerships Associate*
Climate Solutions
1402 Third Avenue, Suite 1305
Seattle, WA 98101
206.443.9570 x 31 (direct)
206.650.4179 (cell)
www.climatesolutions.org
@climatesolution
http://www.facebook.com/climatesolutions

Washington * Oregon * Montana * Idaho

Are you in Seattle Thursday, 1/12/12? Stop by our open house b/w 5:30-7:30 p.m.
1402 Third Ave, Suite 1305 – part of the Tour de Vance

January 7, 2012

Brian Boudet c/o
Community and Economic Development Department
747 Market Street, Room 1036
Tacoma, WA 98402

Re: South Downtown Sub-area Plan

Historic Tacoma is pleased that the City of Tacoma is embarking on a comprehensive plan for the South Downtown Subarea. We urge the City and its consultants to address the South Downtown Subarea’s historic resources as significant character defining elements, which can influence allowed uses and density limits for long-range development goals. As such, the project should seek the highest and best use of existing historic structures and provide additional density with sympathetic development as needed.

We understand that an existing conditions survey will be the next major plan phase. It is critical that the subarea’s historic buildings and the neighborhoods that they define are identified at the outset to preserve and enhance their unique characteristics and contributions to the larger district. Historic resource inventories were last conducted in the area between 2001-03. We understand that funds are available within the sub-area/EIS project to update these inventories and thus recommend updating historic resources inventories and incorporating their results into the broader conclusions reached in the upcoming existing conditions survey.

Housing is a necessary component of such broad-based development. Historic Tacoma believes that strengthening existing residential neighborhoods and extensive use of live/work ‘loft’ living units are the preferred first steps in adding to the population base of the sub-area. New housing should be added to support and not supplant or compete with the residential capacity to be achieved by use of existing resources and opportunities.

Historic Tacoma has maintained an active interest in the Brewery and Dome districts; the Brewery district has been on the organization’s Watch List of vulnerable properties (see attached) for three years. Important character-defining building clusters and neighborhoods include the existing mixed-rate and affordable housing developments to the west. These include pockets of older residences which influence the design character of the low to mid-density housing abutting the commercial /industrial areas and provide valuable support to proposed
development zone uses. Former industrial sites contain large volume buildings of robust and utilitarian character, which define the district and the blue-collar qualities of the city. These structures can support a wide variety of uses; some have already been re-purposed, including the former Chihuly complex and the brick warehouse that now houses Ault Electric Co. The sub-area plan should particularly favor intact groups of buildings, such as clusters of historic factories in the heart of the Brewery District and the Pacific Brewing Co. building complex.

The Dome District has built its own identity as a railroad and transportation center, with many historic contributing businesses and industries. Historic Tacoma recommends working directly with Dome District representatives to set the context for future development.

In the Pacific Northwest there are many models of resurgent neighborhoods whose success is rooted in their innate historic character. We need look no farther than the campus of the University of Washington, Tacoma, for an excellent example of intact historic fabric enhanced by thoughtful infill construction. Portland’s Pearl District, Seattle’s Georgetown neighborhood and Granville Island, in Vancouver, B.C. are all examples of industrially based neighborhoods which have been integrated into the fabric of vibrant urban areas without compromising or losing their historic character. We encourage close study of these successful examples.

All of the goals and recommendations of Historic Tacoma, as well as the full spectrum of development opportunities envisioned for the area could be enhanced with an area-wide, or project-specific Public Development Authority. The new dawn of large scale planning in Tacoma, as evidenced by the concept of the South Downtown Sub-area Plan is the perfect occasion to bring this forward-looking solution to bear in serving the City’s planning and development goals.

Historic Tacoma appreciates the opportunity to submit these comments and looks forward to a productive collaboration with the City in this bold venture.

Sincerely,

[Signature]

Caroline T. Swope, M.S.H.P., Ph.D.
Board President
Historic Tacoma
January 4, 2012

Ian Munce
City of Tacoma
747 Market St.
Tacoma, WA 98402-3769

RE: S. DOWNTOWN SUBAREA SCOPING

Dear Ian,

Thank you for inviting Pierce Transit to be involved in the S. Downtown EIS Scoping process. We are supportive of the City’s vision to encourage high density development, which will promote people to live and work in the same neighborhood. Public transportation and complete pedestrian infrastructure are vital in this type of environment.

Since City and Pierce Transit staff have devoted, and will continue to devote, a significant amount of time and resources to ensure that transit operations and passenger amenities are appropriately located, it’s imperative the eventual redevelopment of the Dome and Brewery Districts make accommodations for public transportation as well. Early coordination between the developer, City staff and Pierce Transit will be essential.

The Public Scoping Notice indicates the Funding goal of PSRC’s program is focused “along light rail corridors in the region”. It’s important that bus service be equally emphasized.

Of particular interest to Pierce Transit is the Air Spares building, adjacent to Tacoma Dome Station. We own this building and envision that it will someday be redeveloped into a Transit Oriented Development site. It is in the heart of the area’s multimodal hub, with access to Sound Transit Express service, Pierce Transit’s local service, Link light rail, Sounder rail, Greyhound and Amtrak. Although not funded at this time, Air Spares holds many possibilities for future redevelopment.

Unfortunately, Pierce Transit was forced to drastically reduce service late last year. Faced with these cuts, our core service continues to be based in the downtown area. Our route network utilizes the following streets within the subarea limits: Yakima, Tacoma, Market, Pacific, Puyallup, Jefferson, Dock, S. 19th, S. 25th, S. 26th, East D, South G. It’s also worth noting that we have been anticipating the regrade of S. 25th Street between Jefferson and Pacific for several years. Upon completion, this will provide us a much needed east-west option. Redevelopment adjacent to these streets must integrate transit elements.

As sources of new funding are found we are optimistic that we will be able to restore service in the years to come. Therefore it is crucial as redevelopment occurs that Pierce Transit’s route networks remain efficient and functional. These streets should be clearly represented and identified in the Subarea plan so that any new or redevelopment projects are aware of our service and can effectively incorporate transit elements into their project.
The University of Washington Tacoma is a partner of this scoping and as such we hope that their Master Plan incorporates Pierce Transit's ability to serve the campus. For example, their Master Plan map inaccurately shows that Market Street is a "potential" public transportation route when in actuality it is one of our main north/south corridors serving the campus. Likewise, we currently serve Tacoma Avenue and Jefferson St, both of which are shown only as "potential" routes on their map.

Tacoma Municipal Code includes transit supportive requirements, based on size and nature of a new or major redevelopment project. Under the area-wide plan, a separate SEPA notice will no longer be required on individual projects. An alternate notification and review process will need to be created to ensure Pierce Transit continues to have the opportunity to identify transit related requirements and to coordinate with individual developers.

Parking is already an issue throughout the downtown and Tacoma Dome Station areas. The EIS should analyze the future demand based on the projected 70,000 additional people living in the Tacoma area by 2030. It should encourage transit ridership while identifying additional parking capacity. Sound Transit plans to increase the capacity of the highly utilized Tacoma-Seattle service by adding additional trains and expanding train lengths. Additional trips will be added to this service as well, placing further demand on an already insufficient amount of parking.

In the future, a water taxi service on the Foss Waterway may become viable. The Subarea plan should not preclude this type of service, nor improvements to infrastructure and should coordinate efforts with the Foss Waterway Authority.

Again, we applaud the City’s efforts and goals for the South Downtown Subarea and look forward to continued collaboration and coordination in the future.

If you have any questions please contact me at (253) 581-8130 or madams@piercetransit.org.

Sincerely,

Monica Adams

Monica Adams, Planner II
Bus Stops, a division of Scheduling & Planning

Cc: Lynne Griffith
    Kelly Hayden
    Tina Lee
    Justin Leighton

#09-178B Downtown Subarea Scoping.doc
January 4, 2012

Mr. Ian Munce
City of Tacoma
747 Market Street, Room 1036
Tacoma WA 98402

In future correspondence please refer to:
Log: 010312-34-PI
Re: South Downtown Sub-Area Plan, Determination of Significance and Notice of EIS

Dear Mr. Munce:

The Washington State Department of Archaeology and Historic Preservation (DAHP) is in receipt of the Determination of Significance (DS) and Notice of EIS Public Scoping regarding the City of Tacoma's South Downtown Sub-Area Plan being jointly prepared with the University of Washington (UW) and funded by the Growing Transit Communities grant program. In response, I am providing for your consideration the following comments and/or recommendations on the Sub-Area Plan and its scope:

1. DAHP commends the City and the UW for undertaking this document and we look forward to participating in reviewing and commenting on document drafts.

2. Based upon the Notice received, we understand the plan, once adopted, will eliminate "...the need for subsequent environmental review associated with project-specific development proposals that are consistent with the subarea's development regulations." As such, we understand that the plan will serve to streamline the review of specific proposals.

3. We note and support the preliminary indication on page 5 that "Historic and Cultural Resources" will be evaluated in the Environmental Impact Statement (EIS) for the plan. We also note and support the inclusion of a qualified and experienced historic preservation consultant on the planning team.

4. We recommend that the South Downtown Sub-Area Plan be compatible with the policies and recommendations of the City's Historic Preservation Plan.

5. Based upon the maps, the South Downtown Sub-Area encompasses the Union Depot-Warehouse Historic District, other designated historic properties, a high density of properties 50 years of age and older, plus potential for archaeological resources. Therefore with this rich base of cultural resources, we recommend that the potential for rehabilitation/adaptive re-use of the many historic properties in the Sub-Area combined with the economic, sustainable, and quality of life benefits in doing so, be a major emphasis in the Sub-Area plan and the various alternatives to be studied.

6. The text and website graphics associated with the DS Scoping Notice suggests that new construction is an expected outcome of the Sub-Area plan. As with any new construction, historic
properties and archaeological resources could be negatively impacted. Therefore, we recommend that the plan also:

- pro-actively identify and incorporate resources and incentives for preservation of the historic built environment;
- procedures for protecting archaeological resources;
- include protective mechanisms such as design standards, code flexibility, transfer of development rights, etc.
- include interpretation of historic properties, cultural resources, and the city's heritage as a tool for enriching the South Downtown urban environment.

In closing, thank you for the opportunity to comment on the South Downtown Sub-Area plan and the scope of the EIS. Should you have any questions, please feel free to contact me at 360-586-3073 or greg.griffith@dahp.wa.gov.

Sincerely,

[Signature]
Gregory Griffith
Deputy State Historic Preservation Officer

c: Reuben McKnight
   Brandon Reynon, Puyallup
   Janet Rogerson, COM-GMS
January 10, 2012

Dear Mr Munce;

I am writing on behalf of the Sustainable Tacoma Commission regarding the Dome / Brewery Subarea Plan & EIS scoping process. The Commission would like to thank the City for conducting this process and inviting citizen participation and input.

The Commission is interested in sustainability elements being included in the EIS, including emphasis on greenhouse gas accounting and mitigation, low impact development, stormwater catchment, active transportation infrastructure, green building standards (including adaptive reuse), distributed energy, air pollution reduction, and public and open space amenities. The main advantage we see for this expedited SEPA permitting process is that it will make compact, livable development faster and easier and thus promote sustainability in that district and the City.

Consistent and straightforward permitting processes and standards can protect appropriate land-uses while ensuring that good projects move quickly to development. Planning and standards for integrating sustainability will be necessary to help our city achieve its environmental, economic, social and cultural goals.

Sincerely,

Steven Garrett
Commissioner
January 10, 2012

Ian Munce, J.D., AICP
Urban Planner, Long Range Planning Division
Community and Economic Development Department
747 Market Street, Room 1036
Tacoma, Washington 98402

Re: U.S. Environmental Protection Agency (EPA) scoping comments on the City of Tacoma’s (City) Notice of Intent (NOI) to prepare the Tacoma Dome/ Brewery District Sub-Area Plan and State Environmental Policy Act Environmental Impact Statement (EIS). (EPA Project Number: 12-4143-CED)

Dear Mr. Munce:

We welcome this opportunity to inform you of issues we believe should be considered as part of the City’s planning for public and private development of the areas around the Tacoma Dome, Brewery District, Thea Foss Waterway, and University of Washington Tacoma. Our overall aim is to help maximize the benefits of combined investment from the City, Puget Sound Regional Council (PSRC) and the HUD, DOT and the EPA Partnership for Sustainable Communities’ (Partnership). Maximizing benefits of combined investment will increase the likelihood that the planning effort will result in better access to affordable housing, more transportation options, lower transportation costs, simultaneous environmental protection, and, equitable development.

Collaborating to maximize the benefits of combined investment, establish standardized and efficient performance measures, and, identify best practices is consistent with the EPA’s June 16, 2009 commitment to the Partnership.1 Our participation is also consistent with the Partnership’s 2011 Priority Area of Focus, “Continue to cultivate and support communities adopting and implementing livability principles.” According to this focus area, “The Partnership will help current grantees succeed by providing technical assistance and tools, building capacity in federal field offices, and giving grantees better access to local networks and resources.”2

Our interest in this specific SEPA EIS process stems from our belief that the City’s plan to build on the concepts and strategies described in the 2008 Tacoma Dome District Development Strategy Update, the 2010 Brewery District Development Concept Study, University of Washington Tacoma Master Plan and other existing studies, reports and policy documents will result in a plan that is consistent with the Partnership’s six Livability Principles.3 Because we expect consistency with the Livability Principles

---

1 http://www.sustainablecommunities.gov/pdf/DOT-HUD-EPA-PartnershipAgreement.pdf
3 http://www.sustainablecommunities.gov/aboutUs.htm#2
and because relative density increases in the Sub-
Area will have regional environmental benefits, we believe increasing the likelihood of full implementation is more important than limiting the range of activities that would be covered by the EIS. Too much flexibility at the individual project level, on the other hand, may result in a transitional Sub-Area without enough livability characteristics to achieve the City’s vision.

To facilitate the identification of an appropriate balance of flexibility and the most effective strategy for full implementation, we recommend that the EIS describe the City's approach to balancing development flexibility with site specific design guidelines and mitigation measures. We expect the final Sub-Area Plan to explicitly identify which design guidelines and mitigation measures would be required. A conservative approach to impact analysis would only assume the implementation of required guidelines and mitigation.

Most of the enclosed detailed comments provide our general expectations for environmental review under the National Environmental Policy Act (Purpose and Need, Range of Alternatives, Standards of Significance, Air Quality, Water Resources, Environmental Justice, Climate Change, Historic Resources, Health Impact Assessment). Some of the enclosed detailed comments address issues more specific to urban redevelopment (Legacy Pollutants, Indoor Air, Livability Measures (covered in Transportation and Monitoring), Urban Forest Restoration, and, Urban Agriculture).

We would like to draw attention, in particular, to our enclosed comments on the development of livability measures. As stated in the enclosed comments, efforts to benchmark existing conditions; develop tools to measure progress towards achieving community visions; and, increase the accountability of engaging in sustainable redevelopment may help to (i) move the national dialogue on livability measures forward, and, (ii) effectively measure the performance of your efforts. To this end, we recommend that the City consider and describe in the EIS the applicability and usefulness of conducting implementation and effectiveness monitoring with a set of livability measures. See our enclosed detailed comments on “Monitoring/Livability Measures” for suggested references; including a recent EPA funded evaluation of draft sustainable community performance measures. One of the pilot region’s evaluated, the Knoxville region, was a recipient of a Sustainable Communities Regional Planning Grant from HUD and their experience could be especially valuable for the City and the PSRC to consider.

We look forward to working with you on this project and if you have any questions please contact me at (206)-553-6382 or peterson.erik@epa.gov.

Sincerely,

Erik Peterson
Environmental Review and Sediment Management Unit

Enclosures:
The EPA Detailed Comments on City of Tacama’s Notice of Intent to prepare the Tacoma Dome/ Brewery District Sub-Area Plan and State Environmental Policy Act Environmental Impact Statement

Purpose and Need
The Purpose is the problem to be solved, the “what” of the proposal. It should be stated as the positive outcome that is expected. The Purpose must not be stated so narrowly that only one pre-selected alternative can fulfill the purpose. It should be stated broadly enough so that a range of reasonable alternatives can be considered and alternatives are not dismissed prematurely. The Need is the “why” of the proposal. The Need should establish evidence that a problem exists, or will exist, based on valid projections, and should be substantiated by facts and, where appropriate, quantitative analyses.

Range of Alternatives
The EIS should include a range of reasonable alternatives that meet the stated purpose and need for the project and that are responsive to the issues identified during the scoping process and to any identified goals and objectives. The analysis of alternatives in the EIS should compare the alternatives with respect to how well they respond to the stated need, issues, goals and objectives. This will ensure that the EIS provides the public and the decision-maker with information that sharply defines the issues and identifies a clear basis for choice.

We recommend the City incorporate into the action alternatives a range of planning concepts (building height and massing, open space, topography, connections/edges, circulation, land use) and/or design guidelines/mitigation measures (impervious surface area or vehicle miles traveled per capita or per job, green building certification etc.) in addition to a range of development intensity and density (number of units, square feet of office, retail and housing, acreage of open space).

Standards of Significance
According to 40 CFR Part 1502.1, “Purpose”, an Environmental Impact Statement, “…shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the environment.”, and, “Agencies shall focus on significant environmental issues...”.

In order to facilitate a full and fair discussion on significant environmental issues, we recommend you consider developing and disclosing project specific standards of significance. The U.S. Department of Energy and Western Area Power Administration July 2010 DEIS on the Grapevine Canyon Wind Project provides a conceptual – and generally substantive – example. According to the Grapevine Canyon Wind DEIS, the “Standards of Significance” for Water Resources (Section 3.6.2.1) are as follows:

- Substantially degrade or contaminate surface water quality.
- Substantially deplete groundwater resources, including interfering with groundwater recharge.
- Cause a violation of the terms and conditions of a Federal, State, or local permit, including the loss or degradation of wetlands in violation of a USACE permit.
- Alter surface drainage patterns or stream channel morphology to the extent that vegetation communities and habitats are degraded or productivity is reduced for current resident species.
• Substantially alter the normal flow of a water body or normal drainage patterns and runoff, or impede or redirect flood flows from the placement of a proposed project component within a 100-year flood hazard area. (p. 133)⁴

The associated environmental consequences analysis of the DEIS, then, is directly linked to the standards of significance. We believe this style of disclosure – direct linkages to standards of significance - may help to ensure that this Project’s SEPA document sharply defines all of the issues by focusing on a full and fair discussion of potential significant adverse environmental impacts.

Air Quality
Air quality impacts would include emissions from internal combustion engines during equipment operation, and fugitive dust from vehicle travel and site grading activities.

**Recommendation:**
The EIS should contain an analysis of emissions from construction, vehicle use, and equipment use, including estimated mitigated annual emissions. Emissions associated with on-site generation of electricity during construction should be included in this analysis.

The EPA supports incorporating mitigation strategies to minimize fugitive dust and toxic emissions, as well as emission controls for particulate matter (PM) and ozone precursors for construction-related activity.

**Recommendations:**
We recommend that best management practices, all applicable requirements under local or State rules, and the following additional measures be incorporated into the EIS, a Construction Emissions Mitigation Plan, and the Record of Decision. See the EPA’s Clean Construction USA website for additional information.⁵

**Fugitive Dust Source Controls:**
- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions. Install wind fencing, and phase grading operations, where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage, and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

**Mobile and Stationary Source Controls:**
- Reduce use, trips, and unnecessary idling of heavy equipment.
- Maintain and tune engines per manufacturer’s specifications to perform EPA certification levels, where applicable, and to perform at verified standards applicable to retrofit

---

⁴ [http://www.wapa.gov/transmission/grapevine/DEISv1complete.pdf](http://www.wapa.gov/transmission/grapevine/DEISv1complete.pdf)
⁵ [http://www.epa.gov/cleandiesel/construction/](http://www.epa.gov/cleandiesel/construction/)
technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.

- Prohibit any tampering with engines and require continuing adherence to manufacturer’s recommendations.
- If practicable, lease new, clean equipment meeting the most stringent of applicable Federal or State Standards.
- Utilize the EPA-registered particulate traps and other appropriate controls where suitable, to reduce emissions of diesel particulate matter and other pollutants at the construction site.
- Limit vehicle speeds on unpaved roads to 15 mph.

**Administrative Controls:**

- Identify all commitments to reduce construction emissions and incorporate these reductions into the air quality analysis to reflect additional air quality improvements that would result from adopting specific air quality measures.
- Identify where implementation of mitigation measures is deemed to be not implementable due to economic infeasibility and provide comparable determinations for other similar projects as justification for this decision.
- Prepare an inventory of all equipment prior to construction, and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.)
- Meet the EPA diesel fuel requirement for off-road and on-highway (i.e., 15 ppm), and where appropriate use alternative fuels such as natural gas and electric.
- Develop construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow.
- Identify sensitive receptors in the project area, such as children, elderly, and infirm, and specify the means by which you will minimize impacts to these populations. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

**Air Toxics**

There are a large number of human epidemiology studies showing increased lung cancer associated with diesel exhaust and significant potential for non-cancer health effects. To help disclose and mitigate potential human health impacts from Mobile Source Air Toxics (MSAT) – especially diesel exhaust - we are providing the following recommendations.

1. Discuss the cancer and non-cancer health effects associated with air toxics and diesel particulate matter. We believe that the resources listed below provide valuable background for this discussion.
a. EPA’s 2002 National Air Toxics Assessment
b. Puget Sound Clean Air Agency’s Puget Sound Air Toxics Evaluation,
c. Oregon Department of Environmental Quality’s Portland Air Toxics Assessment.
d. Control of Hazardous Air Pollutants from Mobile Sources Final Rule

g. Recent papers published and presented at the 89th annual Transportation Research Board Meeting.
   i. Simplifying the Estimation of the Health Impacts from Freight Activity in an Urban Environment
   ii. Bus Shelter Placement and Exposure to Particulate Matter for Waiting Transit Passengers
   iii. Results of a Comprehensive Field Study of Fuel Use and Emissions from Non-Road Diesel Construction Equipment

2. Identify sensitive receptor locations, particularly parks, schools, hospitals, day care centers, etc.
3. Disclose all locations at which emissions would increase near sensitive receptors. Consider intersections, increased traffic, including increased diesel traffic and increased loads on engines (higher speeds, climbs, etc.).
4. Assess or account for (qualitative or modeled depending on the severity of existing and projected conditions) factors that could influence the degree of adverse impact to human health. These factors include, for example, distances to human activity centers and sensitive receptor locations and the amount, duration, location and dispersion of emissions.
5. Hotspot analysis for receptor locations for air toxics and particulate matter.

**Indoor Air**

We encourage the City of Tacoma to integrate lessons learned at High Point into EIS. Findings from the Breathe Easy project at High Point may be especially relevant for Sunset Terrace as the two public housing communities were constructed by the same developer at nearly the same time. See the EPA’s website on Indoor Air Quality for additional information: [http://www.epa.gov/iaq/](http://www.epa.gov/iaq/)

**Water Resources**

To meet the requirements of the Clean Water Act, the EIS must identify all water bodies likely to be impacted by the project, the nature of the potential impacts, and the specific discharges and pollutants likely to impact those waters (addressing both Section 402 and 404 discharges and potential impairments to water quality standards). The EIS must also disclose information regarding relevant Total Maximum Daily Load (TMDL) allocations, the water bodies to which they apply, water quality standards and pollutants of concern.

---

6 [http://www.epa.gov/ttn/atw/ntamain/](http://www.epa.gov/ttn/atw/ntamain/)
8 [http://www.deq.state.or.us/aq/toxics/pata.htm](http://www.deq.state.or.us/aq/toxics/pata.htm)
9 72 FR 8428, February 26, 2007
303(d) listed waters should not be further degraded. If additional pollutant loading is predicted to occur to a 303(d) listed stream as a result of a project, the EIS should include measures to control existing sources of pollution to offset pollutant additions.

Consider implementing watershed or aquatic habitat restoration activities to compensate for past impacts to water resources, particularly in watersheds with 303(d) listed waters where development may have contributed to impairments through past channelization, riverine or floodplain encroachments, sediment delivery during construction, and other activities that may have affected channel stability, water quality, aquatic habitat, and designated waterbody uses. Provisions for antidegradation of water quality apply to water bodies where water quality standards are presently being met.

**Legacy Pollutants**

*Phase I* and *Phase II* environmental site assessments should be conducted, as appropriate, in accordance with American Society for Testing and Materials standards. Please disclose the most recent findings from any relevant legacy pollutant studies in the EIS. We also recommend that the EIS discuss the City’s proposed approaches for managing legacy pollutant issues in the Sub-Area. By disclosing the City’s proposed approaches, the EIS will help to facilitate a broader dialogue aimed at finding creative solutions.

For more information about the EPA Region 10’s Brownfield Program, please see the program’s website at: [http://yosemite.epa.gov/r10/cleanup.nsf/sites/bf](http://yosemite.epa.gov/r10/cleanup.nsf/sites/bf)

**Environmental Justice**

Actions should be taken to conduct adequate public outreach and participation that ensures the public and Native American tribes understand the possible impacts to their communities and trust resources. Government agencies should also identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations, low-income populations, and Native American tribes. The EPA considers children, the disabled, the elderly, and those of limited English proficiency (LEP) to be potential EJ communities due to their unique vulnerabilities. For more resources on how to consider environmental justice, see references on the EPA’s “Environmental Justice Considerations in the NEPA Process” website.\(^\text{12}\)

**Transportation**

Integrating enhancements for public transportation, bicycles and pedestrians – as well as providing through capacity for vehicles – is consistent with quality urban design, increases clean and efficient transportation options, and promotes healthy living.

To assess/inform the sustainability of your designs we recommend you consider and discuss – if appropriate - the usefulness of relevant performance metrics. “Greenroads”, for example, is a tool which can be used to assess/inform roadway sustainability – a key component of an integrated and sustainable transportation system.\(^\text{13}\) For more information on measuring the sustainability of streets and transportation contact the author of this letter for a copy of the memorandum to EPA Smartgrowth from ICF International, “Scoring Smart Growth Streets Literature Review – Findings”


\(^{13}\) [http://www.greenroads.us/](http://www.greenroads.us/)
The following resources may also help to assess/inform your transportation plan:

- Green Highway Partnership.14
- The following references from the 89th annual Transportation Research Board Meeting.15  
  - Carsharing’s Impact on Household Vehicle Ownership  
  - Examining Transportation Impacts with a Multimodal Perspective  
  - Catching a Ride on the Information Super Highway  
  - Markets for Dynamic Ridesharing  
  - How does the Built Environment Influence Pedestrian Activity and Pedestrian Collisions at Intersections

**Adaptive Management, Mitigation and Monitoring**
Adaptive management is an iterative process that requires selecting and implementing management actions, monitoring, comparing results with management and project objectives, and using feedback to make future management decisions. The process recognizes the importance of continually improving management techniques through flexibility and adaptation instead of adhering rigidly to a standard set of management actions. For adaptive management to succeed there must be agreement to adjust management and/or mitigation measures if monitoring indicates that goals are not being met. Although adaptive management is not a new concept, it may be relatively new in its application to specific projects. As stated in a recent CEQ report, *Modernizing NEPA*, the effectiveness of adaptive management monitoring depends on a variety of factors including:

- The ability to establish clear monitoring objectives;
- Agreement on the impact thresholds being monitored;
- The existence of a baseline or the ability to develop a baseline for the resources being monitored.
- The ability to see the effects within an appropriate time frame after the action is taken;
- The technical capabilities of the procedures and equipment used to identify and measure changes in the affected resources and the ability to analyze the changes;
- The resources needed to perform the monitoring and respond to the results.

**Recommendations:**
We recommend that the EIS describe the potential environmental benefits of a formal Adaptive Management Plan. Such a plan should be designed to ensure the success of mitigation measures and to provide management flexibility to incorporate new research and information.

We recommend that the Adaptive Management Plan include a timeline for periodic reviews and adjustments, as well as a mechanism to consider and implement additional mitigation measures, as necessary, after the project is developed. Monitoring and evaluation should be used to determine if management actions are achieving objectives.

We recognize the Department of the Army’s mitigation and monitoring regulations at 32 CFR Part 651.15(b) and agree with the Council on Environmental Quality that these regulations provide a comprehensive approach to ensuring that mitigation proposed in the NEPA review process is completed and monitored for effectiveness. The Planning Guidance Notebook

---

(Department of the Army Regulation 1105- 2-100) also includes useful information for mitigation and monitoring planning.

Monitoring/ Livability Measures
We believe the Project presents opportunities to redevelop in a manner consistent with the HUD-DOT-EPA Interagency Partnership for Sustainable Communities’ (Partnership) six Livability Principles. Another aspect of the Partnership is the “Partnership Agreement”. In this agreement, HUD-DOT and EPA state their intention to “Develop livability measures and tools”.

We believe monitoring associated with the overall redevelopment effort is an opportunity to both learn about and learn from livability measures and tools. Efforts to benchmark existing conditions; develop tools to measure progress towards achieving community visions; and, increase the accountability of engaging in sustainable redevelopment may help to (i) move the national dialogue on livability measures forward, and, (ii) effectively measure the performance of your efforts.

We recommend that the EIS discuss your effectiveness monitoring strategy. Potentially useful general guidelines and resources for an effective monitoring strategy include, but are not limited to:

- Council on Environmental Quality’s “Draft Guidance for NEPA Mitigation and Monitoring”.
- EPA’s Green Communities.
- ICF International Sustainable Communities Performance Measures: Final Memo (contact the author of this letter for a copy).
- HUD DOT EPA Draft Evaluation of Proposed Sustainable Community Performance Measures (contact the author of this letter for a copy).

Plants and Animals
Urban Forest Restoration
Potentially beneficial urban forest restoration goals include, but are not limited to, the following:

- Enhancing connections to adjacent neighborhoods.
- Connecting wildlife/bird corridors and increasing habitat.
- Enhancing stormwater management, increasing water evaporation, reducing thermal heating effects and offsetting carbon emissions.
- Enhancing public open spaces and pedestrian corridors.

The EPA strongly supports these goals and we recommend that the EIS compare how different redevelopment alternatives, design guidelines/ mitigation measures and planning concepts would impact reaching them. For more information on the human dimensions of urban forestry and urban greening see http://www.naturewithin.info/.

Threatened and Endangered Species

16 http://www.epa.gov/dced/partnership/index.html
18 http://www.epa.gov/greenciti/index.htm
The EIS should identify the endangered, threatened, and candidate plant and animal species, and, other sensitive species within the project area. The EIS should also describe critical habitat; identify impacts the project would have on species and their critical habitats; and how the project would meet all ESA requirements, including consultation with the U.S. Fish and Wildlife Service and National Oceanographic Atmospheric Administration National Marine Fisheries Service. We believe an adequate EIS includes – if relevant to the project - a biological assessment and/or a description of the ESA Section 7 consultation with USFWS and NOAA Fisheries.

**Invasive Species**
Ground disturbing activities create opportunity for establishment of non-native invasive species. Analysis and disclosure of these actions and their effects, as well as any mitigation to prevent or control such outbreaks should be included. We urge that disturbed areas be revegetated using native species and that there be ongoing maintenance (wholly or primarily non-chemical means) to prevent establishment of invasives in areas disturbed by project activities.

**Land Use**
**Urban Agriculture**
Potential environmental benefits from urban agriculture include, but are not limited to: including but not limited to:
- Reduced food transportation costs and emissions.
- Water quality benefits from stormwater infiltration and water re-use.
- Food security.
- Economic opportunity.
- Community building.
- Increased supply of traditional foods.
- Reduced organic waste through on-site composting.
- Reduced food packaging waste.
- Increased opportunities for exercise.
- Reduced landscaping maintenance costs.

We recommend that the City of Renton consider urban agriculture and its potential benefits in the DEIS. Some issues to consider include the following:

- The current and future (under various redevelopment alternatives and/or planning concepts) areal extent of urban agriculture on the site
- The current and future economic and social contributions of urban agriculture on the site.
- An urban agriculture plan which addresses:
  - The appropriate balance of individual ownership and shared spaces
  - Leadership and organizational structures and processes
  - Visual impacts from different urban agriculture practices (including untidy or weedy plots)
  - Erosion from rotating or unplanted areas
  - Insect and small mammal infestations
  - Water management (e.g., the difference between the water consumption of drought tolerant landscaping and urban agriculture)
Cost/benefit analysis of pesticide and herbicide use versus integrated pest management and organic agriculture
Adaptive management and mitigation of potential soil contamination.

In addition to numerous useful and up-to-date local resources on urban agriculture you may find the U.S. Department of Agriculture’s National Agriculture Library Alternative Farming Systems Information Center helpful.20

Climate Change
Ongoing climate change research as summarized by the United Nations Intergovernmental Panel on Climate Change concludes that climate is already changing; that the change will accelerate; and, that human greenhouse gas emissions, primarily carbon dioxide, are the main sources of accelerated climate change. Effects of climate change particularly relevant for this project includes changes in hydrology (including sea level rise) weather patterns, and, precipitation rates. Accounting for these effects will require adaptation, which is defined by the IPCC as the, “...adjustment in ecological, social, or economic systems in response to actual or expected climatic stimuli and their effects or impacts.”

Recommendation:
We recommend that the EIS describe whether or not and how climate change considerations have influenced decisions (E.g., Project Design Features, mitigation measures, Alternatives development etc.)

Health Impact Assessment
Projects that have potential to substantially affect social, economic, and/or environmental conditions within communities may benefit from a Health Impact Assessment (HIA), or, at least, elements of HIA. HIA is a combination of procedures, methods, and tools that enables systematic analysis of the potential positive or negative effects of a policy, plan, program or project on the health of a population and the distribution of those effects within the population.21 HIA also identifies actions to mitigate negative effects. The potential need to address health is supported by the NEPA at Public Law 91-190, 42 U.S.C. 4321-4347, §4321 and §4331; by NEPA regulations at 40 CFR 1508.8, and 1508.27; by Executive Order 12898 on Environmental Justice; and E.O. 13045 on Children’s Health and Safety.

Assessing health impacts is important in conducting environmental impact analyses because health effects from development projects, programs, or policies are often more far-reaching than is commonly recognized. Environmental analyses often consider release of pollutants, contaminant exposure, and/or cancer risks, but other health impacts that could occur are often overlooked. For example, other health impacts that could occur include:

- Income from new jobs can have positive health impacts by increasing socioeconomic status or increasing access to health care. This income has also been associated with decreased access to health care by changing someone’s eligibility for public assistance programs. Income from new jobs has also been associated with increased rates of alcohol and drug use, and domestic violence

and child abuse due to increased discretionary income, rapid social and community change (particularly in rural areas) and disrupted family structure due to unusual work schedules.

- Replacing low-income housing with high-cost housing can lead to negative health impacts on displaced populations, including increased incidence in chronic diseases, depression, and anxiety.

- Adding lanes to a roadway increases vehicle traffic volume and speed. This could result in increased motor vehicle crashes and increased severity of those crashes. Increased vehicle volume also affects air quality in neighborhoods adjacent to the road, potentially exacerbating the rate and severity of respiratory disease in vulnerable populations.

- Adding green space to a community, such as neighborhood parks, can lead to increased physical activity, which may lower incidence of obesity and cardiovascular disease, while providing a greater sense of well being and improved mental health for residents.

Health effects such as these have been documented, but are rarely addressed in environmental analyses.

When it appears that a HIA should be conducted, we recommend involving public health professionals early to assist in data gathering and analysis. Public health data and expertise may be available from local and state health departments, tribal health agencies, or federal public health agencies such as the U.S. Centers for Disease Control and Prevention’s National Center for Environmental Health, U.S. Agency for Toxic Substances and Disease Registry, or Indian Health Service.

Guidelines for conducting HIA are available from various sources, including:

- The World Health Organization (WHO) website provides links to many of these at: http://www.who.int/hia/about/guides/en/.

- The International Finance Corporation has developed detailed guidelines for conducting HIA. http://www.ifc.org/.


Historic Resources
The EPA recommends that no Finding of No Significant Impact or Record of Decision be completed until the processes of consultation, analysis, review and documentation required by Section 106 of NHPA have been fully completed. If adverse effects to historic properties are identified, any Memorandum of Agreement developed to resolve these concerns under Section 106 of NHPA should be referenced in the ROD.
January 10, 2012

Mr. Ian Munce  
Urban Planner  
City of Tacoma  
747 Market Street  
Tacoma, WA 98402

RE: South Downtown Subarea Plan and Environmental Impact Statement (EIS)

Dear Mr. Munce:

Thank you for allowing the Washington State Department of Transportation (WSDOT) the opportunity to comment on the scoping process for the South Downtown Subarea Plan and Environmental Impact Statement (EIS). WSDOT looks forward to working with the city during its development of the South Downtown Subarea Plan and EIS and asks that the subarea planning team take advantage of seeking input from WSDOT and other transportation partners and consider the impacts of the subarea plan on:

State Highway System: Portions of three major state routes are located within and/or adjacent to the proposed study area. The facilities being I-705 and SR 509, which passes through and/or terminates within the study area and I-5, a major regional highway, located just adjacent to the study area. Having state facilities located within the immediate area of the study area WSDOT will be interested in what potential impacts the proposed subarea plan and EIS could have on any of these state facilities. WSDOT will want the opportunity to review and comment on any traffic analysis that is conducted during the process.

Mitigation Measures: WSDOT is interested in how mitigation measures will be implemented, particularly implementing improvements to address potential impacts to state facilities. It is our understanding that under this process, the city’s adoption of the subarea plan and subsequent ordinance would exempt future developments from additional review, substituting the case-by-case evaluation that WSDOT would normally do under SEPA. We are therefore concerned that the EIS description of mitigation measures for state facilities may not be in sufficient detail to account for the impacts of any proposed developments.

WSDOT’s preference is that the implementation plan for this planned action builds in clear opportunities to evaluate project-specific traffic impacts to state facilities. Tacoma and WSDOT should be able to require additional traffic analysis at time of project permitting. Again, WSDOT is particularly interested in minimizing impacts to the state highway system from proposed actions.

Will there be provisions to revisit the plan’s recommendations at some future threshold or timeline? The concern is that, when development does occur, it could take the form of something very different than what the EIS and preferred alternative assumes. This could result in significant changes in growth, trip generation and
distribution than envisioned, calling the EIS findings of future traffic operations into question. If so, this would require a new look at mitigation than that described in the EIS.

Transit: The proposed subarea plan and EIS should consider and identify transit's ability to help mitigate the effects of growth on the transportation system as well as the evaluation how different levels of transit service can accommodate projected growth in jobs and people in the area.

Traffic Demand Management: The proposed subarea plan and EIS should consider the strategies and impacts on meeting the statewide goals for reducing vehicle miles traveled. The proposed plan should evaluate the effects of land use policies and jobs/people growth targets on transportation demand. Without changes in mode share, services, and infrastructure, the transportation system may be overwhelmed. How would different mode share targets affect transportation performance in the future? The plan should also consider providing alternative travel choices to reduce trips into, out of, and within the subarea.

Sustainability: What strategies will be employed to reduce the consumption of energy and other resources through land use linkages?

Climate Change/Environmental: The proposed subarea plan and EIS should consider addressing how it will help meet statewide goals for reducing transportation emissions. The analysis should consider a climate change vulnerability risk assessment on facilities in general, and particularly on transportation infrastructure. Potential impacts from sea-level rise and river flooding on transportation infrastructure in the Tacoma area could affect the transportation system (WSDOT can offer our assessment of the state routes that may be vulnerable in the area).

Thank you for the opportunity to comment on this proposal and we look forward to working with the City in regards to this study. Please contact George Kovich of my office at (360) 704-3207 if you have any questions or would like to discuss any of these comments.

Sincerely,

[Signature]

Ron Landon
Transportation Planning and Program Manager
WSDOT, Olympic Region

RL:dlm
GK

cc:   Leah Bolotin (WSDOT)TB55
      Leonard Bauer (Commerce)  48350
      Heather Ballash (Commerce) 48350
January 9, 2012

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

Re: Scoping for the South Downtown Subarea Plan and Environmental Impact Statement (EIS)

Dear Mr. Munce and Mr. Boudet:

Thank you for the opportunity to contribute our comments to Tacoma’s South Downtown Subarea Planning Environmental Impact Statement (EIS) scoping process. We hope that in providing our comments the build-out of the area will proceed smoothly and address long term public health concerns, risks, and benefits.

In putting together the scoping document for this project, we offer the following comments.

1. Unfamiliar environmental regulations may cause unnecessary delay in completion of a project or build-out of an area.
   • Please provide a section(s) addressing how various regulatory requirements will be addressed during the course of build-out. Include items such as;
     o Waste management (e.g. asbestos, demolition materials, fill materials, etc.);
     o Underground Storage Tanks;
     o Contaminated soil and/or groundwater (documentation and remediation should be completed prior to installation of permanent structures that would otherwise limit remediation activities);
     o Abandoned wells; and
     o Other state and local environmental regulations.

   Our agency can work with you to provide further specifics regarding these regulations.

2. In addition to strict regulatory requirements, there are a number of land use development aspects having an impact on public health which should also be included in the EIS.
   • Please provide a section(s) addressing how the following items will be included in the planned development.
     o Tacoma Urban Forestry and Agriculture Element implementation.
     o Reducing sources of and mitigating exposure to fine particulate matter and greenhouse gases such as ozone;

Anthony L-T Chen, MD, MPH, Director of Health
(253) 798-6500  
(800) 992-2456  
TDD: (253) 798-6050
January 9, 2012
Scoping for the South Downtown Subarea Plan and Environmental Impact Statement (EIS)
Page 2

- Implementation of Complete Streets; promote safe and convenient pedestrian and bicycle access to transit, grocery stores, parks, trails and other resources.
- Promote waste reduction, reuse and recycling to discourage vectors and limit nuisances.
- Promote the use of building construction techniques and materials, such as LEED standards, that improve ventilation and other aspects of indoor air quality.

We would also like to suggest that Community Participation be expanded. The November Notice of EIS Public Scoping describes a community input process and appeal process that is available only in conjunction with the issuance of the non-project Final EIS. Additional clear avenues for community participation will be needed as the Subarea Plan and EIS are implemented over the next ten years. Ongoing meaningful community participation is vital for successful plan development and implementation.

Throughout this process our agency would like to work with you in planning for and addressing public health issues associated with this project. Please let us know if you have any questions or would like to discuss our recommendations. Feel free to contact Rob Olsen at (253) 798-2855 or rolsen@tpchd.org, our representative on the Growing Transit Community Tacoma Subarea Plan Steering Committee. We look forward to helping with this and other efforts building sustainable transit oriented development.

Sincerely,

[Signature]

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