



City of Tacoma
Landmarks Preservation Commission

April 6, 2021

Anna Petersen, Chair
Tacoma Planning Commission
747 Market St Rm 345
Tacoma, WA 98402

RE: Home in Tacoma

Dear Chair Petersen:

The City of Tacoma's Landmarks Preservation Commission (LPC) thanks the Planning Commission for the opportunity to provide comments on the Home in Tacoma proposal, and appreciates the outreach by City staff to present the proposal and gather our initial feedback on the policy phase of Home in Tacoma. I am pleased to offer the following comments on behalf of the LPC.

The LPC firmly believes that preservation is part of the solution for the challenge of affordable housing in Tacoma. Tacoma is a city that retains much of its historic character, and residents and visitors alike benefit from our rich historic built environment. Retaining that sense of place and identity is an important consideration in the development of housing policy.

The current proposal is a significant change for the City and one that will hopefully address the issue of affordability, choice, and availability. However, the transition away from single-family zoning will result in marked changes to Tacoma's built environment and must be undertaken in a careful and inclusive manner in order to retain the character, identity, and essential qualities of our City.

Many of our denser historic residential areas, such as the North Slope Historic District, possess a historic mixed density of buildings, including apartment buildings, duplexes and triplexes as well as single-family homes. Historically, these areas were well served by streetcars and were dense, walkable areas. Some of the outcomes the Home in Tacoma policies seek to achieve already exist due to the historical development of some of our neighborhoods prior to the first zoning codes in Tacoma.

Overall, the primary concern of the LPC is the protection of the essential characteristics and qualities of our neighborhoods and their built environment, which make our City a place that we are proud of and that makes others want to call this place home. We look forward to continuing to work on future design guidelines that will help protect the historical and cultural character of our City while moving it forward into the future.

The LPC offers the following recommendations around three key themes that need to be addressed in moving forward with this proposal: New Development, Equity and Anti-Racism, and Sustainability.

New Development

New development should be focused on currently vacant spaces first, and then on adaptive reuse of existing structures, particularly those that have historical or cultural value to the community. If demolition

is proposed, policies should prioritize underutilized spaces (e.g., prioritizing proportionally small structures on large lots), and existing structures that are non-contributing or non-conforming to the historical development of a neighborhood.

The LPC does not believe that exempting historic districts from zoning changes resulting from Home in Tacoma is appropriate. However, we do anticipate a marked increase in the number of requests for demolition permits in these areas. This would affect City staff and LPC resources significantly and result in large impacts to level of service.

Recommendations:

- Prioritize development on vacant land first.
- Provide regulatory incentives to prioritize adaptive reuse of viable structures.
- Ensure design compatibility for infill and new development through strong design standards/guidelines and a robust public design review process, both within existing historic districts and citywide. Key considerations include context- appropriate scale, materials, massing and form.
- Adopt policies and regulations to dis-incentivize demolition (e.g., limit development potential on parcels where a historically designated structure is proposed for demolition).
- Focus demolition on underutilized spaces and existing structures that are non-contributing or non-conforming.
- Address the resource strain to City staff and the LPC if policies increase the request for demolition within historically designated zones and districts.

Equity and Anti-Racism

Current City code includes demolition review of existing City landmarks, structures within historic districts, and limited review for other structures citywide, but does not include most single-family residential structures in the City. Designated landmarks and historic districts in our City do not currently represent the geographic and cultural diversity of our City's history. If demolition review continues in its current state, the demolition related impacts from Home in Tacoma would not be mitigated. Historic resources representing underserved parts of the community would be disproportionately affected. In stark terms, this would mean that this proposal would have potentially racist consequences in essentially erasing the physical remnants of our City's diverse history. There needs to be a recognition of this fact and measures taken to address it moving forward.

In addition to addressing the potential loss of historic resources in underrepresented neighborhoods in Tacoma, it is just as important to have policies and regulations that prevent the physical displacement of these communities. Some of the most affordable housing currently exists in these neighborhoods, particularly in Central Tacoma, South Tacoma, and the East Side. This affordability means that these neighborhoods will face increased development pressure within the scope of the current proposal.

It is clear that the current proposal addresses "affordability" and not necessarily the "crisis" of housing in Tacoma. It is unclear for whom the proposed housing will be "affordable." There are significant racial and socioeconomic issues that underlie the issue of "affordability" and of the "crisis" that are not being addressed in this proposal. There are underserved and underrepresented communities who are suffering as part of a real housing "crisis" in our City, and the current proposal does not recognize or address this issue.

Recommendations:

- Recognize that the demolition of viable and historically significant structures outside of current historic districts, which are located primarily in North Tacoma, is a significant equity issue.
- Expand current demolition review code language to protect structures of historical or cultural significance outside of current historic districts
- Devote funding and resources to the proactive identification, documentation, and preservation of historically and culturally significant buildings in all areas of the City, particularly those historically underserved and underrepresented.
- Create policies and regulations to address the preservation of existing affordable housing stock and prevent or mitigate displacement by prioritizing home ownership and the retention of existing communities.
- Be transparent in regards to who benefits from this effort to address “affordability” and who is left out, particularly in regards to the “crisis” of homelessness and the issue of home ownership.

Sustainability

The current proposal will lead to an increase in demolition across the City. The waste stream impacts from redevelopment resulting from Home in Tacoma implementation will be significant. Demolition is often the least sustainable solution, with the most sustainable building being the one that is currently standing. Strong policy is needed to encourage adaptive reuse as the most sustainable solution. This is in line with the City’s sustainability goals. Historic preservation can help move our City forward in a sustainable manner that uses the resources of the past to serve the needs of the present while not sacrificing those of the future.

Recommendations:

- Provide regulatory incentives to prioritize adaptive reuse of viable structures.
- Adopt robust architectural salvage requirements for demolition permits, when demolition is the preferred alternative.

We look forward to continuing our collaboration with the Planning Commission on these issues as the current proposal moves forward to City Council and on the resulting amendments to the Land Use Code and related development guidelines.

Sincerely,



Kevin Bartoy, Chair
Tacoma Landmarks Preservation Commission