



City of Tacoma  
**Preliminary Mitigated Determination of  
Environmental Nonsignificance**

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**Home in Tacoma Project  
Amendment to the Comprehensive Plan and Land Use Regulatory Code  
SEPA File Number: LU21-0006**

**TO:** All Departments and Agencies with Jurisdiction

**SUBJECT:** Preliminary Mitigated Determination of Environmental Nonsignificance

In accordance with WAC 197-11-350, a copy of the Preliminary Mitigated Determination of Environmental Nonsignificance for the project described below is transmitted:

**Applicant:** City of Tacoma  
Planning and Development Services Department  
747 Market Street, Room 345  
Tacoma, WA 98402

**Proposal:**

As part of Tacoma's Affordable Housing Action Strategy, the **Home in Tacoma Project** consists of recommended changes to Tacoma's housing growth strategy to increase housing supply, affordability and choice for current and future residents. As directed by the City Council, Tacoma's Planning Commission has developed a package of policy recommendations, including updates to the One Tacoma Comprehensive Plan, establishing a new housing growth vision and policy framework for Tacoma. The package includes the following:

- Updates to Tacoma's housing growth strategy and policies to promote housing goals and to strengthen anti-racism and anti-displacement policies and programs
- Establishment of two new Future Land Use designations in support of future zoning that would allow a range of housing types throughout Tacoma's neighborhoods, and allow mid-scale multifamily housing in areas near shopping and transit
- Policy updates calling for design controls and other standards to ensure that new housing complements existing neighborhood scale and residential patterns
- Strengthening of policies to make housing more affordable and calling for expansion of Tacoma's affordable housing incentives and requirements

In addition, the proposals include a package of near-term code changes intended to support adopted housing policies, and a Housing Action Plan intended to guide implementation over time.

The City has determined that, overall, implementing these proposals would result in a better outcome for the environment as compared to the current housing growth strategy. Adoption of these proposals would make it more likely that Tacoma will meet its adopted local and regional growth goals and will result in improved outcomes in terms of housing, health, transportation, environmental, economic, and other goals. As a Metropolitan City, Tacoma is generally well-positioned to accommodate growth. Furthermore, the City has the regulatory, infrastructure and other processes and standards in place to address the majority of impacts that can be anticipated to result from these proposals, with the exception that additional analysis and potential actions are required to ensure that development is supported by adequate infrastructure and services in support of upcoming zoning changes.

The mitigation steps associated with this determination are to conduct that review and identify policy and other options to address infrastructure and service needs.

This information will aid in informing the potential for further mitigation in the next phase of this SEPA determination.

**Mitigation:**

- Work with infrastructure and services stakeholders to conduct a detailed analysis of infrastructure capacity relating to the Home in Tacoma Project proposal.
- Develop a framework of options that can work to balance the infrastructure and services realities with the goals of the Housing Action Plan and the Home in Tacoma Project.
- Address potential environmental impacts at three project phases:
  - Phase 1 -- the current phase, adoption of policy commitments
  - Phase 2 – development of zoning and standards, potential phasing of implementation, and specific actions to support growth
  - Phase 3 – at the time of site development through City review of project-level impacts
- Ensure the growth goals required by the GMA, PSRC Vision 2050 and Countywide Planning Policies are being met and that this analysis informs the GMA-mandated 2024 One Tacoma Comprehensive Plan Update.
- Ensure that infrastructure policy options are developed quickly and efficiently to cause no undue delay to the Home in Tacoma Project, in support of the City Council's schedule to complete zoning and standards development in 2021.

The complete text of the proposed amendments and the associated staff analysis reports are available for review at the below address and posted online at [www.cityoftacoma.org/homeintacoma](http://www.cityoftacoma.org/homeintacoma).

**Location:** City of Tacoma

**Lead Agency:** City of Tacoma

**City Contact:** Larry Harala  
Planning and Development Services Department  
747 Market Street, Room 345  
Tacoma, WA 98402  
Phone: (253) 318-5626  
E-mail: lharala@cityoftacoma.org

The lead agency has determined that this proposal will not have a probable significant adverse impact on the environment. Pursuant to WAC 197-11-350(3), the proposal has been clarified, changed, and conditioned to include necessary mitigation measures to avoid, minimize or compensate for probable significant impacts. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). The necessary mitigation measures are listed below, the Environmental Checklist is attached and **Comments must be submitted by 5:00 p.m. on April 9, 2021**. The Responsible Official will reconsider the DNS based on timely comments and may retain, modify, or, if significant adverse impacts are likely, withdraw the DNS. **Unless modified by the City, this determination will become final on April 12, 2021**. There is no administrative appeal for this determination. Appeals must be filed in conjunction with appeals of the adopted amendments to the Growth Management Hearings Board; appeals shall be taken in accordance with procedures and limitations set forth in RCW 43.21C.075 and WAC 242-02. In addition to Growth Management Hearings Board requirements, a copy of the appeal shall be

filed with the Planning and Development Services Department, 747 Market Street, Room 345, Tacoma, Washington 98402.

The Puyallup Tribe is notified that this initiates the consultation process.

Responsible Official: Peter Huffman  
Position/Title: Director, Planning and Development Services Department

Signature: 

SEPA Officer Signature: 

Issue Date: March, 10 2021  
Comment Deadline: April 9, 2021, 5:00 p.m.

NOTE: The issuance of this Preliminary Determination of Nonsignificance does not constitute project approval. Future project applicants must comply with all other applicable requirements of the City of Tacoma and other agencies with jurisdiction prior to receiving development permits.

- c: Puyallup Tribe of Indians, Planning and Land Use Department, 3009 E. Portland Ave., Tacoma, WA 98404 (U.S. mail only)
- Puyallup Tribe of Indians, David Duenas, Building Official, [David.Duenas@PuyallupTribe.com](mailto:David.Duenas@PuyallupTribe.com)
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- Tacoma Pierce County Health Department, SEPA Review Team, [sepa@tpchd.org](mailto:sepa@tpchd.org)
- Port of Tacoma, Jason Jordan, [jjordan@portoftacoma.com](mailto:jjordan@portoftacoma.com)
- Metro Parks Tacoma, Debbie Terwilleger, [debbiet@tacomaparks.com](mailto:debbiet@tacomaparks.com)
- Metro Parks Tacoma, Joe Brady, [joeb@tacomaparks.com](mailto:joeb@tacomaparks.com)
- Metro Parks Tacoma, Marty Stump, [martys@tacomaparks.com](mailto:martys@tacomaparks.com)
- Pierce Transit, Bus Stop Program, Tina Vaslet, [tvaslet@piercetransit.org](mailto:tvaslet@piercetransit.org)
- Puget Sound Clean Air Agency, Steve Van Slyke, [stevev@pscleanair.org](mailto:stevev@pscleanair.org)
- Department of Ecology, [separegister@ecy.wa.gov](mailto:separegister@ecy.wa.gov)
- Department of Natural Resources, SEPA Center, [sepacenter@dnr.wa.gov](mailto:sepacenter@dnr.wa.gov)
- Department of Transportation, Olympia Region Development Services Team, [OR-SEPA-REVIEW@wsdot.wa.gov](mailto:OR-SEPA-REVIEW@wsdot.wa.gov)

File: Planning and Development Services

# SEPA ENVIRONMENTAL CHECKLIST

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**SEPA File Number: LU21-0006**

## **A. BACKGROUND**

The City of Tacoma is experiencing a housing supply and cost crisis which has accelerated over the past decade, creating conditions which are adversely impacting residents of the City. These impacts are particularly challenging to lower income residents; however, the problem affects all residents regardless of income level. Due to long term trends, incomes are expected to continue to increase more slowly than housing costs, resulting in a worsening situation unless action is taken to change those trends. The issue is also deeply rooted in equity and social justice and, like most communities in the region, the City of Tacoma has a troubled past relating to issues of racial segregation, redlining and other discriminatory practices. There is a disproportionate impact on people of color and others facing economic disadvantages put in place due to systemic racism. The Affordable Housing Action Strategy (AHAS) was adopted by the Tacoma City Council in 2018 to help stabilize and make inroads into improving conditions. The Home In Tacoma Project includes a package of policy actions intended to increase housing supply, choice and affordability citywide by more broadly allowing diverse (Missing Middle) housing types, strengthening affordability incentives and requirements, and supportive policy and administrative actions. The changes are directed by adopted One Tacoma Comprehensive Plan policies. In 2019 the City Council updated the Housing Element, making implementation of the AHAS adopted policy, and specifically calling for the actions included in the Home In Tacoma Project, including Missing Middle Housing strategies and affordability strategies.

The Affordable Housing Action Strategy outlines four strategic objectives intended to guide implementation with the following recommendations.

1. Create more homes for more people. (The Home in Tacoma Project seeks to implement this objective)
2. Keep housing affordable and in good repair.
3. Help people stay in their homes and communities.
4. Reduce barriers for people who often encounter them.

Each strategic objective is supported by a set of actions and implementation steps. The Home in Tacoma Project is intended to specifically fulfill objective number one of the AHAS. The Housing Action Plan is a long-term strategy, with initial actions being taken in as part of the current phase of work. The success of the Affordable Housing Action Strategy depends on two critical elements. The first critical element is the active participation of Tacoma residents. Actions will not be successful without policy leadership, changes to the way the city programs and departments operate, and close partnerships with local and regional developers, cultural and nonprofit organizations, financial institutions, philanthropic organizations, and community members. The other critical element is investment of public, philanthropic, and private resources. The total cost to meet the targets in the Affordable Housing Action Strategy is significant: as much as \$70 million over the next 10 years (2018-2028). The Affordable Housing Action Strategy outlines several ways to cultivate new resources, such as passage of a local tax levy; value capture, and additional authorization of federal Section 108 funds, to help meet its targets. It also recognizes the wealth of resources that already exist within the City of Tacoma and identifies ways to maximize their impact.

The Home In Tacoma Project fits within AHAS Objective 1: More Homes For More People. It does so primarily by changes to Tacoma's housing growth vision, policies and rules that govern all housing development—most of which is done by the private sector. The primary purpose of the Home in Tacoma Project is to help foster an environment where more homes for more people can become a reality for the City of Tacoma. The proposal aims to do that by establishing in new housing growth vision, policies and implementation tools to create an environment that is more conducive to increasing housing type diversity, affordability, and overall supply. The Home in Tacoma Project also strengthens housing policies and programs intended to combat displacement, promote the re-use of existing structures, and ensure that housing construction contributes to Tacoma's goals in multiple ways. As home prices continue to escalate it is more difficult for existing homeowners to keep up, and

by allowing options such as increased density it is anticipated that many single-family homes may be converted allowing homeowners to age in place, and to provide more diverse choice at lower cost that would occur otherwise.

There are many other key aspects and benefits to the proposal including the promotion and enhancement of the following:

- Housing supply affordability and choice
- Equity and anti-racism by increasing access to housing and ownership
- Housing type variety and choice
- Sustainable and resilient housing
- Housing more closely developed near and relating to transportation
- Shifting transit modes
- Workforce Housing
- Economic development and diversity
- More efficient use of public infrastructure
- Supporting local businesses

### **Existing situation:**

The City of Tacoma lacks adequate supply of affordable homes for all its residents. In 2018, nearly 33,000 households in Tacoma were paying at least 30 percent of their income toward housing costs each month, reducing their ability to pay for other necessities, and the problem has only worsened since. The cost of rental homes has increased by nearly 40 percent and home values have nearly doubled since 1990, and within the last few years, these costs have begun to accelerate.

Throughout the broad community outreach that informed the development of the Affordable Housing Action Strategy, many Tacoma residents shared that the city's market gains are a source of stress in their lives. This theme has been echoed in community engagement for the Home In Tacoma Project. Recent spikes in housing costs and a limited supply of housing options have created uncertainty for them, in addition to other barriers. The drivers of Tacoma's need for housing development remain, including regional growth and the widening gap between incomes and housing costs, while Tacoma's capacity to accommodate that growth is limited by current housing rules driving down housing creation and increasing costs.

Seniors face long waiting lists at properties built to serve them, families live in overcrowded conditions, and interested homebuyers experience steep costs and competition for homes. Simply put, the City's housing supply cannot meet the daily needs of its residents, and per City Council direction this needs to change.

*Growth data summary:* During development of the Home in Tacoma Project the City developed preliminary growth estimates based on existing zoning and the two proposed housing growth scenarios. The City plans for growth as required under the regional growth framework – Vision 2040 and the new growth targets set in Vision 2050. As such, Tacoma is required to plan for 137,000 new residents by 2050. The City collaborates in the county-level Buildable Lands growth allocation effort, which will use a planning period of 2020 to 2044. Based on this approach, Tacoma is planning for a low, moderate, and high growth range. The Low is 24,000 by 2044, or an average of 1000 housing units per year. The high is 53,724, or 2,239 housing units per year.

Given Tacoma's current largely built out development pattern there is less available undeveloped land in the City. Many other communities throughout the region have a larger supply of undeveloped land; it is anticipated that much of the regional growth will continue to funnel to those areas. Unless change occurs in our zoning structure it is anticipated that Tacoma will experience growth primarily in the centers with limited growth in the rest of the city. Missing Middle policy changes would likely increase the rate of growth to some degree (though unlikely to exceed Tacoma's current growth targets), but spread where the growth occurs around the city.

New housing growth continues to be split primarily between single family and multi-family with little Missing Middle development occurring: 85% of Tacoma's permitted new unit development between 2016 and 2020 was multi-family and 13% was single family, with the remaining 2% being duplex and

ADU development. The proposals would also likely result in a broader distribution of housing types citywide, including a larger share of Missing Middle Housing types, than would occur under the current zoning rules.

*Tacoma’s Existing Growth Strategy* – Creating new housing, particularly at affordable prices, is central to the AHAS recommended actions. Tacoma has a robust growth strategy to accommodate its share of regional growth. Tacoma’s official growth targets call for 54,741 new housing units between 2010 and 2040 (see the 2014 Pierce County Buildable Lands Report). The City’s growth strategy directs the majority of new housing development to designated Centers, including the Downtown and Tacoma Mall Neighborhood Regional Growth Centers. The City’s adopted targets allocate about 80 percent to Centers, and about 20 percent (approximately 9,300 new dwellings) to other (primarily residential) areas. While there is ample space for high density residential and mixed-use development in Centers, land zoned to accommodate significant growth outside of Centers is limited. The Buildable Lands Report identifies undeveloped, multifamily zoned land adequate for approximately 2,000 new dwellings. This leaves a target of around 7,000 new dwellings in land zoned for single-family development. Single-family land constitutes approximately 75 percent of all land where residential development is allowed. The proposed changes make it more likely that Tacoma will accommodate that amount of growth in low-scale neighborhoods outside of Centers within the planning period.

In conclusion, while there is ample existing single-family development, and sufficient capacity for high density development, there is little area zoned to accommodate medium-density housing types such as duplexes, triplexes and small-scale multifamily development. Most new housing growth is large-scale multifamily development, occurring in Tacoma’s designated Mixed-Use Centers, including Downtown.

**1. Name of proposed project, if applicable:**

**Home in Tacoma Project, City of Tacoma Affordable Housing Action Strategy**

**2. Proponent/applicant:**

City of Tacoma  
 Planning and Development Services Department  
 747 Market Street, Room 345  
 Tacoma, WA 98402-3701

**3. Contact:**

Larry Harala  
 Planning and Development Services Department  
 747 Market Street, Room 345  
 Tacoma, WA 98402-3701  
 Phone: (253) 318-5626  
 E-mail: lharala@cityoftacoma.org

**4. Date checklist prepared:**

March 8, 2021

**5. Agency requesting checklist:**

City of Tacoma, Planning and Development Services Department

**6. Proposed timing or schedule (including phasing, if applicable):**

For more detailed information, see the Home In Tacoma Project Staff Report.

Milestones	Timeframe
City Council acceptance of Affordable Housing Action Strategy (AHAS)	September 2018

Citywide AHAS implementation actions	Ongoing
City Council adoption of AHAS Housing Element updates	September 2019
Planning Commission Home In Tacoma Project Scoping <ul style="list-style-type: none"> <li>Public Hearing (02/19/21)</li> <li>Final scope of work adopted (05/06/21)</li> </ul>	November 2019 to May 2020
Planning Commission develops proposed actions <ul style="list-style-type: none"> <li>Development of public engagement and analysis approaches</li> <li>Broad consultation with the community including the Housing Choices Survey, online interactive map, and Virtual Housing Café series</li> <li>Targeted consultation with key stakeholder groups including internal departments, partner agencies, City Commissions, the Housing Equity Taskforce, people of color, renters, housing development community, neighborhood groups.</li> <li>Technical analysis including existing conditions report, growth trends and capacity, development and population trends, access to opportunity, housing needs assessment, evaluation of effectiveness of current housing tools, and feasibility analysis of proposed actions.</li> <li>Development of growth options and strategies, including diverse housing types, affordability actions, programmatic and administrative actions, and housing policy development</li> <li>Refinement of proposals into the public review draft package</li> <li>City staff release this SEPA draft determination with the public review package</li> </ul>	May 2020 to Present <ul style="list-style-type: none"> <li>Planning Commission authorized for release by the Planning Commission on February 17, 2021</li> <li>Public information meeting set for March 18, 2021</li> <li>Public Hearing Date set for April 7, 2021</li> <li>Comments deadline April 9, 2021</li> </ul>
Planning Commission recommendations to the City Council, reflecting input received during the Public Hearing process	April to May 2021
<b>City Council discussion, Public Hearing and action on the proposals</b>	May to June 2021 (tentative)
Home In Tacoma Project PHASE 2: Development of zoning, standards and other actions implementing the City Council direction on the first phase. Actions likely to include: <ul style="list-style-type: none"> <li>Broad and targeted community and stakeholder engagement</li> <li>Areawide rezoning</li> <li>Design standards and other regulatory updates</li> <li>Administrative and program actions</li> <li>Environmental (SEPA) review and determination</li> </ul>	July to December 2021 (tentative)
Future phases of implementation of the AHAS, Home In Tacoma Project, Housing Action Plan and other policy direction	Ongoing
The City will conduct a periodic review of Tacoma's Comprehensive Plan and development regulations for compliance with the Growth Management Act, SEPA and other requirements, and including a review of implementation and initial outcomes of the Home In Tacoma Project actions, along with parallel policy efforts such as the Climate Action Plan and Impact Fees Study.	Dates to be determined, with City Council action in 2024

**7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

The Comprehensive Plan and implementing development regulations are amended on an annual basis consistent with the State Growth Management Act. The proposed changes to the text, maps, and policies of the Comprehensive Plan will apply to future land use and development. Proposed changes to the Land Use Regulatory Code and the Official Zoning Map will occur in a subsequent phase of this proposal.

The proposal would be phased into two sequential but related projects. The first phase is primarily focused on update to the One Tacoma Comprehensive Plan with minor code updates. The second phase, which is expected to occur in the fall of 2021, will be focused on evaluating the existing zoning and development regulation scheme to assure consistency between the One Tacoma Plan Future Land Use Map, and then adopting new implementing regulations.

The proposed Housing Element updates reflect and integrate the City's Affordable Housing Action Strategy (AHAS) as an implementation element of the One Tacoma Comprehensive Plan. Implementation of the AHAS will involve actions in multiple categories taken in collaboration with multiple city departments, public agencies, the private sector, and citizens.

The Affordable Housing Action Strategy (AHAS) is a strategic response to a changing housing market, increasing displacement pressure, and a widespread need for high-quality, affordable housing opportunities for all. The AHAS focuses on how to enhance existing policies and programs to serve more people; identify and deploy additional funding; and establish strong anti-displacement measures to stabilize existing residents over the next 10 years. The AHAS contains 27 recommended actions that are being implemented by multiple city departments and other partners. See Attachment 1 for AHAS excerpts. This effort seeks to implement two high priority actions identified by the AHAS to meet Strategic Objective 1: Create More Homes for More People. In 2019 the City Council adopted updates to the One Tacoma Comprehensive Plan Housing Element integrating the AHAS as an implementation strategy and updating policies related to "Missing Middle" housing, inclusionary zoning and equitable access to opportunities.

Tacoma is also committed under the GMA to conducting regular updates to the Comprehensive Plan and development regulations and is already preparing to do so by the 2024 state deadline. At that stage, Tacoma will continue with implementation of any housing policy changes made under the Home In Tacoma Project. These could include modifications to policies, zoning, standards, programs, infrastructure and services provision, or other measures.

**8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

As part of the Home in Tacoma project the following documents have been generated:

- Home In Tacoma Project documents:
  - Home In Tacoma Project Scoping Report (May 2020)
  - Project Overview and Staff Report
  - Proposed Comprehensive Plan changes
  - Proposed near-term code changes
  - Missing Middle Housing Scenarios
- Housing Action Plan, including the following appendices:
  - Existing Conditions Assessment
  - Growth Capacity analysis
  - AHAS PDS Implementation Summary

The Home in Tacoma Project also builds on environmental review conducted over many years, including:

- Affordable Housing Action Strategy
- VISION 2050 Final Supplemental Environmental Impact Statement



- VISON 2040 Final Environmental Impact Statement
- City of Tacoma Climate Action Plan
- City of Tacoma Environmental Action Plan
- City of Tacoma Urban Forest Manual
- Draft 2021 Stormwater Management Manual (SWMM)
- City of Tacoma Shoreline Master Program
- City of Tacoma Municipal Code Title 13.11 Critical Area Preservation, 13.12 Environmental Code, 13.15 Commute Trip Reduction
- Pierce Transit Destination 2040 Plan
- Metro Parks Tacoma Strategic Plan

**9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

The geographic scope of the proposed changes includes the Missing Middle Applicability Area, as shown on maps included to answer question 12 of this checklist. In addition, changes to the affordable housing incentives and programs would pertain to Centers, Corridors, and other areas where such programs apply.

Future development applications would be subject to the approved amendments to the *Comprehensive Plan* and the *Land Use Regulatory Code*.

Development Permit applications may be pending in areas that may be included in this program. In the future phase area-wide rezoning effort, properties that have pending permits maybe be impacted by the proposal. Such properties would typically be vested to the regulations in place at the time that application was complete.

**10. List any government approvals or permits that will be needed for your proposal, if known.**

The proposed amendments are subject to the following governmental approvals:

- State Environmental Policy Act (SEPA) review and threshold determination for non-project actions
- Adoption by Tacoma City Council
- Verification of GMA compliance by Washington State Department of Commerce
- Department of Ecology approval (RCW 90.58.090)
- Plan Certification by Puget Sound Regional Council during the upcoming GMA 2024 One Tacoma Comprehensive Plan Update

**11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site.**

The complete text of the proposed amendments and the associated staff analysis reports are available for review at the Planning and Development Services Department at the below address and posted on the website at [www.cityoftacoma.org/homeintacoma](http://www.cityoftacoma.org/homeintacoma).

As part of Tacoma’s Affordable Housing Action Strategy, the Home in Tacoma Project consists of recommended changes to Tacoma’s housing growth strategy to increase housing supply, affordability and choice for current and future residents. As directed by the City Council, Tacoma’s Planning Commission has developed a package of policy recommendations including updates to the One Tacoma Comprehensive Plan establishing a new housing growth vision and policy framework for Tacoma, including the following:

- Updates to Tacoma’s housing growth strategy and policies to promote housing goals and to strengthen anti-racism and anti-displacement policies and programs.
- Establishment of two new Future Land Use designations in support of future zoning that would allow a range of housing types throughout Tacoma’s neighborhoods, and allow mid-scale multifamily housing in areas near shopping and transit.
- Policy updates calling for design controls and other standards to ensure that new housing complements existing neighborhood scale and residential patterns.

- Strengthening of policies to make housing more affordable and calling for expansion of Tacoma’s affordable housing incentives and requirements.

## **WHAT’S IN THE HOME IN TACOMA PROJECT PACKAGE**

Proposals would change policies in Tacoma’s Comprehensive Plan – the City’s blueprint for community growth. If adopted, these policies would initiate changes to Tacoma’s housing zoning, standards and programs.

*For more analysis and the full proposals, see the staff report, Housing Action Plan, proposed Comprehensive Plan changes, and environmental determination. The package also includes near-term code changes to clarify implementation of current housing rules.*

### **A NEW HOUSING GROWTH VISION**

*Utilize housing growth to create neighborhoods that are inclusive, welcoming to our diverse community, resilient, thriving, distinctive and walkable, including robust community amenities and a range of housing choices and costs.*

### **UPDATING HOUSING POLICIES**

- Increase housing options throughout the City
  - Renew Tacoma’s longstanding vision for housing growth Downtown and in Centers
  - Expand Missing Middle housing options in Tacoma’s neighborhoods
  - Plan for the impacts of growth on urban infrastructure such as sidewalks, traffic and utilities
- Ensure that new housing is well designed and complements Tacoma’s distinctive neighborhoods
  - Use design standards to ensure that infill complements neighborhood scale and patterns
  - Provide for smooth transitions from low-scale to higher-scale areas by preventing abrupt changes
  - Protect the character of historic districts and promote reuse of existing structures
- Evolve our housing vision to be more inclusive of all members of our community
  - Address inequitable access to opportunity in Tacoma’s neighborhoods
  - Shift regulatory language away from “family” to allow households to define themselves
  - Address lingering impacts of systemic racism and facilitate homeownership and wealth-building opportunities for people of color
  - Promote accessibility for people of different physical abilities
- Recognize that housing is a fundamental building block of community that affects multiple goals
  - Promote housing in Tacoma as an alternative to urban sprawl, building on long-term public investments
  - Build sustainable and resilient housing to address the climate emergency, urban forestry goals, and protect the health of the Puget Sound
  - Promote infill in walkable areas with transportation choices to reduce car dependency

### **ENABLING MISSING MIDDLE HOUSING**

The recommendations call for implementing the new housing growth vision by enabling diverse housing types, often called Missing Middle Housing, throughout Tacoma’s neighborhoods.

The term “Missing Middle Housing” describes a long-term trend in many American cities of limiting smaller, attached, or clustered housing types. Many cities have set aside most of their neighborhoods for single-family houses, and directed tall buildings to high-density areas. What’s missing is space for mid-scale housing types, and the housing choices that they can provide.

Tacoma’s land use framework largely fits this model. Today, the City sets aside about 75 percent of our housing land supply for single-family houses. This was not always the case. Many of Tacoma’s most walkable and sought after neighborhoods, built before single-family zoning, offer a wide range of housing choices. Compatible design features, building height and scale, and attention to transitions help to create a strong and cohesive neighborhood identity, while the housing options support affordability, diversity, walkability and thriving neighborhood businesses.



"Missing Middle is a range of multi-unit or clustered housing types compatible in scale with single-family homes that help meet the growing demand for walkable urban living."

### Proposed New Residential Land Use Designations

Recommended changes to the Comprehensive Plan support future zoning changes allowing diverse housing types (Missing Middle Housing) throughout the City's neighborhoods. The proposal would create two new residential land use designations supporting diverse housing types, which would replace the current Single-family and Multi-family Low-Density Land Use designations, and establish infill design principles.

Land Use Designations	Housing types supported	Standards
<b>Low-Scale Residential</b>  INTENT: Support diverse housing types in structures that are consistent with houses.	Single-family Duplex Triplex Townhouses Cottage housing Shared housing <u>In some circumstances:</u> Fourplex Small multifamily Tiny/mobile homes	<ul style="list-style-type: none"> <li>• Building height and scale similar to houses</li> <li>• Accessory structures in rear yard</li> <li>• Limit the size/bulk of structures</li> <li>• Usable open space/yards</li> <li>• Pedestrian orientation to the sidewalk &amp; street</li> <li>• Moderate onsite parking</li> </ul>
<i>Standards common to both</i>		<ul style="list-style-type: none"> <li>• Pedestrian orientation to the sidewalk &amp; street</li> <li>• Street trees</li> <li>• Reduced lot sizes and setbacks</li> <li>• Encourage alley access for cars</li> <li>• Design standards for specific housing types</li> </ul>
<b>Mid-scale Residential</b>  INTENT: Support mid-scale multifamily housing in areas close to shopping and transit.	Housing types listed above Mid-scale multifamily Live-work Limited retail/office	<ul style="list-style-type: none"> <li>• Building height, width and depth mid-scale between houses and Centers</li> <li>• Transition standards to abutting low-scale areas</li> <li>• Smaller/shared yards and open space</li> <li>• Moderate to low onsite parking</li> </ul>

### Housing growth scenarios

The Planning Commission has issued two housing growth scenarios to help determine the housing types and scale to be allowed throughout the City's neighborhoods. In both scenarios:

- Single-family and Multifamily Low-Density Land Use Designations are replaced by the proposed Low-scale and Mid-scale Residential Land Use Designations, allowing more housing choices citywide

- Areas where housing is not the primary goal are excluded (such as parks, commercial and industrial areas)
- No changes are proposed to Downtown and Centers which already support higher-density housing
- Areas near Centers, Corridors, and (in Scenario 2) bus routes are proposed for Mid-scale Residential

Scenario 1: Evolve Housing Choices	Scenario 2: Transform Housing Choices
Total Missing Middle Applicability area: about 15,500 acres (roughly half of the City's total area)	
Current land use designations: 90% Single-family, 10% Multifamily (Low-density)	
Low-scale Residential 75% Mid-scale Residential 25%	Low-scale Residential 40% Mid-scale Residential 60%

The difference between the scenarios is the extent of each of the two proposed new Residential designations. Both scenarios include significant new housing options, with the most substantial increases in Scenario 2. However, in either case single-family houses will likely remain the most common housing type in Tacoma for some time. To view the scenarios and learn about the pace of development which could result, visit [www.cityoftacoma.org/homeintacoma](http://www.cityoftacoma.org/homeintacoma).

### Getting housing growth right

City Council action on these options will set the vision for housing growth and establish the desired housing types and scale in Tacoma's neighborhoods. This will initiate the next phase of public engagement and policy analysis, including:

- Zoning changes
- Design standards updates
- Actions to ensure that urban infrastructure and services are adequate to support growth
- Potential phasing of implementation, if directed by the City Council
- Actions to address the potential demolition of viable structures
- Actions to create green, sustainable and resilient housing
- Actions to promote physical accessibility
- Review of City permitting and processes
- Education and technical support for developers and the public

### STRENGTHEN POLICIES AND PROGRAMS TO MAKE HOUSING MORE AFFORDABLE

Allowing Missing Middle Housing promotes affordability by increasing the amount, location, and types of housing that can be built citywide. But today, regional growth and the growing gap between incomes and housing costs mean that more action is needed to create housing that Tacoma residents can afford.

As part of the Affordable Housing Action Strategy, the City is pursuing multiple actions to meet affordability needs including increasing the supply of public funding for affordable housing. To support and expand on those efforts, the **Home In Tacoma Project** proposes to expand the City's affordable housing regulatory incentives and requirements. These programs enable the City to partner with housing developers to create affordable units as growth occurs. Our analysis of Tacoma's housing market show that the market is strong enough to support expanded use of these tools. There are multiple policy options.

### Affordability recommendations

- Strengthen policy guidance for affordability tools and set affordable housing production targets
- Update Tacoma’s existing affordable housing incentives and requirements to reflect lessons learned
- Recognizing current market strength, consider policy options to expand regulatory affordable housing tools
- Consider expansion of the City’s Multifamily Tax Exemption Program, 12-year affordable housing option
- Establish an anti-displacement strategy to help lower-income residents stay in growing neighborhoods
- Initiate actions to promote access to housing and wealth-building for people of color

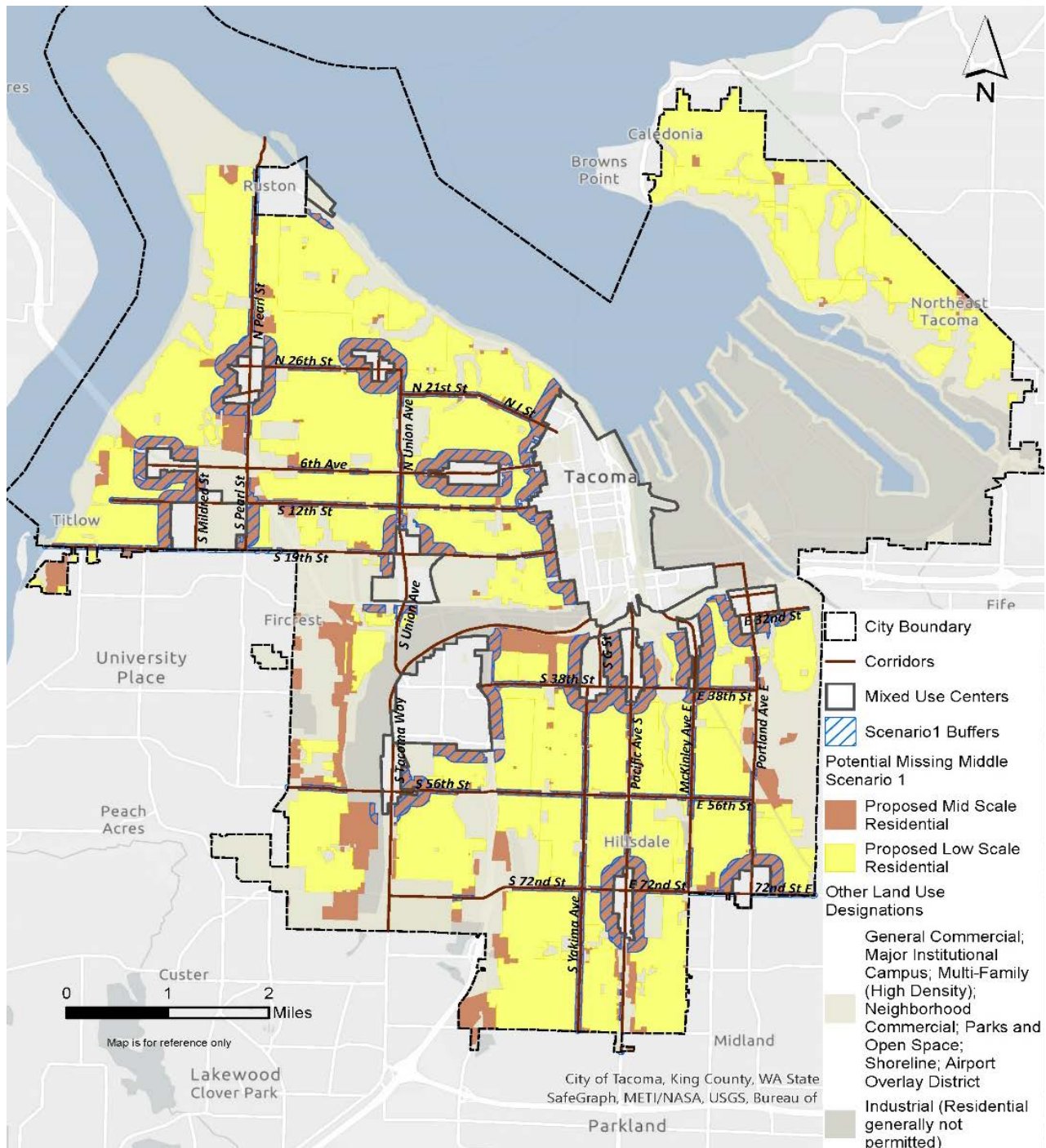
If the City Council adopts these policies, the City will integrate updates and expansions to these programs in the next phase of work.

**12. Location of the Proposal: (Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any. If a proposal would occur over a range of area, provide the range or boundaries of the site(s).)**

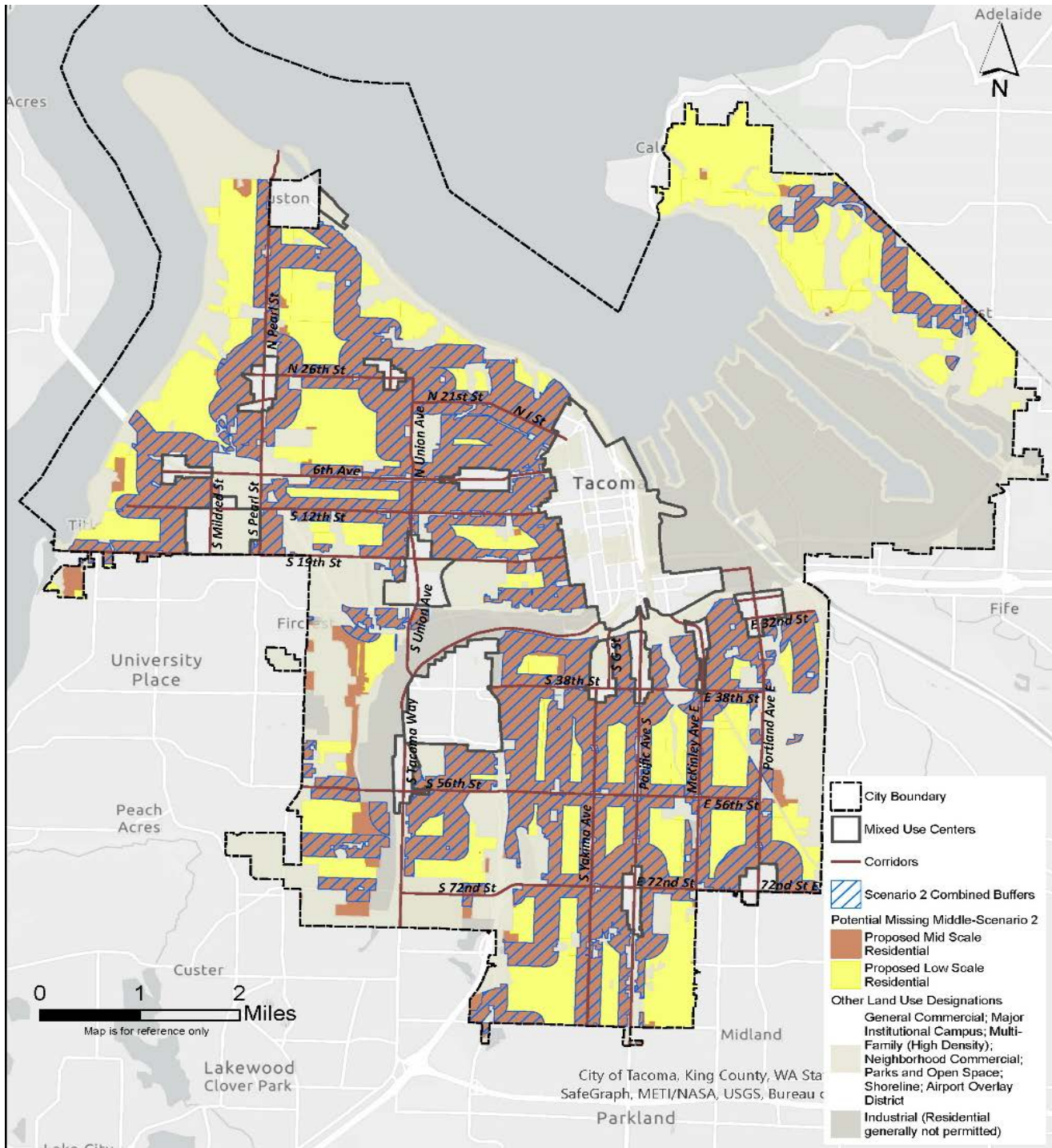
Proposal (Subject)	Location of the Proposal (Area of Applicability)
(1) Comprehensive Plan Update	<p>Citywide. Land use policy changes apply within the Missing Middle Applicability Area (which includes the current Single-family and Multi-family Low-scale Future Land Use designations, not including the Airport Compatibility Overlay District).</p> <p>Housing policies and affordability incentives, requirements and programs apply citywide in some or all areas where housing is permitted.</p>
(2) 2 <sup>nd</sup> Phase: Implementation	<p>Potential standards changes - Citywide.</p> <p>Potential Areawide rezones See maps below</p>

**Scenario 1: Evolve Housing Choices**





## Scenario 2: Transform Housing Choices



**C. SIGNATURE**

**The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.**

**Signature:** \_\_\_\_\_ 

**Name of signee:** Larry Harala

**Position and Agency/Organization:** Senior Planner, City of Tacoma

**Date Submitted:** \_\_\_\_\_ March 9, 2021



## D. SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS

*Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment. When answering these questions, be aware of the extent the proposal or the types of activities likely to result from the proposal that would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.*

**As a Metropolitan City, Tacoma is generally well-positioned to accommodate growth. Furthermore, the City has the regulatory, infrastructure and other processes and standards in place to address the majority of impacts that can be anticipated to result from these proposals, with the exception that additional analysis and potential actions are required to ensure that development is supported by adequate infrastructure and services in support of upcoming zoning changes.**

### 1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

The Home in Tacoma Project is a non-project action and as such would not directly impact water and air quality, release hazardous substances, or produce noise.

The program is intended to encourage medium density urban infill, seeking to accommodate new housing in areas already urbanized with access to transit and walkable neighborhood amenities. This is a smart growth best management practice for managing stormwater runoff and air pollution which will result in probable overall improvements to air quality and stormwater runoff. Adding growth in Tacoma, a largely built-out city versus adding that growth on the periphery of regional development in previously undeveloped, very low density rural areas is preferred and will mean an overall reduction in impact to regional air and water quality.

Increase to population in Tacoma would result in unavoidable increases to discharge to water; however, it is anticipated this growth would otherwise impact even more sensitive areas throughout the region in more significant ways. The City of Tacoma is largely a built environment and increasing density will require less new infrastructure and disturbance to undeveloped lands that might otherwise be the case with new suburban developments.

The City of Tacoma has a set of stringent guidelines (Stormwater Management Manual) relating to stormwater runoff and any new development would be subject to those policies. The City of Tacoma regularly updates its Stormwater Management Manual (previously called the Surface Water Management Manual) to comply with the most recent National Pollutant Discharge Elimination System (NPDES) permit, to clarify information and to incorporate updated policies. All new development that may occur in the future as a result of this proposal would be subject to these policies.

According to the EPA's report "Using Smart Growth Techniques as Stormwater Best Management Practices," smart growth infill can reduce the amount of stormwater runoff generated by new development by accommodating new housing growth in already impacted areas rather than greenfield areas. As new housing units are accommodated in urbanized areas, a higher density of housing is provided within the same overall impervious footprint as a new single family unit in a greenfield site. As a result, the proposed area-wide rezones will achieve probable overall reduction in stormwater runoff and the City's Stormwater Management BMPs would ensure that minimum water quality standards are met for discharge to streams.

Regarding air quality impacts, the predominant form of emissions to air would be generated from new vehicular trips. While multifamily housing units typically result in an overall increase in total vehicular trips, the new units will likely result in a reduced rate of trips per unit, as single family development typically has a higher overall rate of daily trips as well as vehicles per unit than multifamily. Infill development would be occurring on more compact sites with less grading work anticipated, on

average, and therefore a lower overall impact to air quality as a result of construction activity is anticipated.

Possible future-phase rezones are predicated on the region continuing to grow at a significant pace. Accommodating this growth in locations that support walkability and transit access is likely to reduce the demand for single occupancy vehicles and overall vehicle miles traveled, particularly as compared to the alternative housing growth occurring in suburban or rural areas that lack transit access, bicycle and pedestrian infrastructure, and walkable neighborhood amenities. The long term impact of the proposed rezones would result in a probable reduction of overall air quality impacts.

**Proposed measures to avoid or reduce such increases are:**

The Home in Tacoma Project is a non-project action and as such would not directly impact water and air quality, release hazardous substances, or produce noise.

That said, the policies are being crafted to meet housing goals in balance with environmental and other goals. The proposals call for control of overall building bulk and site coverage. While new development would likely increase impervious surface, this would occur at significantly lower levels than would be the case for greenfield development or single-family development on a per household basis.

The proposals can also help reduce an ongoing impact to water quality and public health by connect people experiencing homelessness with housing options. People without access to basic facilities including toilets cause impacts to open space and water quality, and experience public health risks in the process. This effort is one part of a multifaceted strategy to address the needs and impacts of homelessness.

Future project-specific development proposals that may result in increased impacts would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code and SEPA procedures.

Overall, by containing growth to an area that has been designated a growth area by the GMA and PSRC Vision 2040/2050 it is hoped that the release of hazardous materials and toxic substances may be somewhat reduced on a region wide basis.

In addition, the housing policies proposed as part of this package call for housing to meet multiple goals including being sustainable and climate resilient, and encouraging reuse, rather than demolition, of viable structures. These actions, as implemented through the next phase, will reduce overall environmental impacts.

**2. How would the proposal be likely to affect plants, animals, fish, or marine life?**

All subjects of the Home in Tacoma Project are non-project actions and as such would not directly impact plants, animals, fish, or marine life.

Future-phase potential area-wide rezones are anticipated to be concentrated in areas that are already developed with residential use or which are highly impacted, where impacts to plants, animals, fish and marine life would be avoided or minimized. Increased density in Tacoma would also represent bringing growth to an area that is already developed and reduce the need for the disruption of sensitive lands elsewhere in the region.

Over the past several years the City of Tacoma has updated its Critical Area Preservation Ordinance and the Shoreline Master Program to meet GMA requirements and to further protect the ongoing health and viability of critical areas. These updates represent strong protections that reflect strengthening of state law as well as community values regarding protecting the environment.

The City of Tacoma also has a transfer of development rights program (TDR), an Open Space Management Program and a Shoreline Management Program. These programs have also been enhanced over recent years to better protect environmental assets and direct development away from environmental hazards.

In 2019 the Tacoma City Council declared a climate emergency and directed city staff to create a Climate Action Plan which is under development and slated to be back before the City Council this

year, 2021. These efforts recognize that accommodating growth in the city is an essential strategy to protecting the environment and reducing and preparing for climate change impacts.

The City of Tacoma has also updated landscaping standards to better reflect best practices from the city's urban forestry manual. In 2019 the City Council adopted the Urban Forestry Management Plan. These policies inform the Home In Tacoma Project which calls for increased tree planting with residential development.

**Proposed measures to protect or conserve plants, animals, fish, or marine life are:**

Future phase and subsequently enabled project-specific development proposals that may result in impacts to plants, animals, fish or marine life would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code and SEPA procedures.

Future phases of this proposal, as well as any subsequent new development, would be subject to Federal and State environmental regulations as well as the City of Tacoma Critical Area Code and Stormwater Management Manual, and Open Space and Urban Forestry Programs. The City of Tacoma has more stringent regulation in terms of development requirements relating to aspects of environmental impact; in addition, the City of Tacoma is a largely mature and built out environment and much of the direct development that may result from these measures would be occurring on already developed sites, not on new previously undeveloped sites. By increasing density to existing developed areas these measures are a net environmental protection for the regional environment.

**3. How would the proposal be likely to deplete energy or natural resources?**

The Home in Tacoma Project is a non-project action and as such would not directly impact energy or natural resources.

The policy proposals, when implemented, would represent an overall conservation of energy and natural resources.

Future phases would enable increased density of development in an already developed area, as well as encouraging reuse of existing structures. These factors can help reduce the cost in materials and natural resources that would be consumed in sprawling development patterns. It is anticipated that less roadway, pipeline, utility lines etc. will be necessary to accommodate infill housing development versus sprawling suburban development.

**Proposed measures to protect or conserve energy and natural resources are:**

Future project-specific development proposals that may result in these impacts would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code and SEPA procedures.

The City of Tacoma presently requires compliance with the Washington State Energy Code, as well as promotion of green building elements. Tacoma Public Utilities has a variety of programs that promote conservation and efficient energy and resource use and management. The City of Tacoma continues to improve and update its code and polices to further preserve energy and become a more sustainable city. The City of Tacoma is fortunate to also have major public utilities which are part of the City of Tacoma itself and those relationships ensure that the City of Tacoma stays at the forefront of sustainability and energy and resource conservation efforts.

The City of Tacoma encourages and supports green building practices through a collaboration between the Office of Environmental Policy & Sustainability, Planning & Development Services, Community & Economic Development, and Tacoma Public Utilities.

- o Current/future requirements:
  - Green building and development certification for Planned Residential Development District (PRD).
  - Electric vehicle (EV) charging infrastructure for commercial and multifamily new construction and major renovations.

- Dedicated interior space for waste, recycling, organics collection for new construction multifamily and commercial (detailed expansion of state code in future).
- Decarbonization/building electrification resolution for city-owned new construction and major renovations (the City Council is currently considering an impact study to consider expansion to new residential/commercial construction in the future).
- Current/future incentives:
  - Height bonus for detached accessory dwelling unit (DADU) with either parking on main level of structure or green building certification.
  - Floor Area Ratio (FAR) bonus for downtown district buildings that incorporate landscaping or vegetated roofs or retention of historic structures.
  - Height bonus for mixed-use districts for stormwater management, vegetated roofs, solar energy collection and energy efficiency.
  - Conditional use permit for Infill Pilot Program projects.
  - Expedited permitting for green building certification projects (future).
  - Food grinder incentives for new construction multifamily projects (future).

**4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?**

This phase of the Home in Tacoma Project is a non-project action and as such would not directly impact environmentally sensitive areas or areas designated for governmental protection.

Future-phase potential area-wide rezones are concentrated in areas that are already developed with residential use or which are highly impacted, where impacts to endangered species, sensitive areas, or parks would be avoided or minimized. The age of the City's housing and location of the rezones makes it likely that the rezones may ultimately impact some historic or cultural sites.

Right now, City of Tacoma has strong existing standards that are adequate to mitigate potential environmental impacts. However, it may be more important to note that there are currently active major policy efforts to update and strengthen these protections even more. The Climate Action Plan, Urban Forestry Plan, and the 2024 GMA plan are all being updated currently or soon and will reflect even more stringent regulation designed to protect species and habitat and to address climate change.

The proposal would have an overall positive environmental and public safety effect by strengthening critical areas protections for Fish and Wildlife Habitat Conservation Areas and geologically hazardous areas regionally by encouraging development in already developed lands in place of more development in outlying undeveloped areas.

- Less Sprawl – Encouraging development of under developed, low density urban lands reduces the need for development on the suburban edge of the region.
- Reduction in auto trips – By encouraging infill, redevelopment of existing low density, under-utilized lands within the urban growth boundary, which are also closer to existing employment centers, it is anticipated that this proposal will overall help reduce auto-trips. This proposal would encourage development within areas that have robust transit systems and are thus much more likely to attract residents who will use mass transit or active transit modes in place of auto trips.
- Encouragement of active transit modes - This proposal would encourage development within areas that have robust transit systems and are thus much more likely to attract residents who will use mass transit or active transit modes in place of auto trips. Much of the City of Tacoma has very good proximity to trails, sidewalks, bike lanes and overall very walkable environments.
- Clustering population near transit increase use and viability of transit – Sound Transit and Pierce Transit have major transit lines and facilities throughout the City of Tacoma and increasing density along these transit routes, lines, and facilities aids in strengthening the long term viability of the transit system.

- Less impact to undeveloped areas – By encouraging redevelopment of underutilized lower density areas within the City of Tacoma there will be a corresponding reduction in development in outlying areas.
- Good for sensitive environmental lands - By encouraging redevelopment in an area designated for growth, that is largely developed and built out with existing infrastructure, there is a reduction in overall environmental impact on a per dwelling-unit basis, versus development in sensitive areas along the periphery of the urban growth boundaries where more potential for negative impact exists for critical areas, and encroachment on agricultural and timber resource lands.
- Good for preservation of timber and agricultural lands and resources – Containing growth within the City of Tacoma helps preserve sensitive agricultural and resource lands which are otherwise being impacted by growth at the peripheries of development throughout the region.
- Good for Salmon and Orca – Containing growth within the City of Tacoma helps to lessen impact to otherwise undeveloped lands. The City of Tacoma has stringent stormwater guidelines. The need to grade and disturb sites is lower in the City of Tacoma than in some of the outlying areas currently under development that have previously been undeveloped. Such activities have wide ranging negative impacts to salmonid waterways, and more growth within the City of Tacoma has a positive impact.

City of Tacoma Historic and Cultural Assets - The City of Tacoma currently has regulatory protections for certain historically designated and historically significant buildings within the Municipal Code. The land use code establishes the Tacoma Register of Historic Places, and a process and guidelines for the Landmarks Commission review and approval of alterations to buildings and structures on the historic register both individually and for contributing structures within locally designated historic overlay zones. There are approximately 1200 properties under the jurisdiction of the Tacoma Landmarks Preservation Commission. Within designated Subareas, the City also has cultural resource review requirements for development projects, including potential impacts to archaeological or culturally sensitive areas. Lastly, there is a Citywide demolition review process for demolitions of a certain size or that occur within Mixed Use Centers and National Register Historic Districts

The Puyallup Tribe of Indians is a recipient of this SEPA Checklist and has been notified as a key stakeholder. The City of Tacoma endeavors to work closely with the the Puyallup Tribe of Indians and incorporate concerns and take guidance regarding preservation of key cultural, historical and environmental assets within The City of Tacoma.

**Proposed measures to protect such resources or to avoid or reduce impacts are:**

This phase of the Home in Tacoma Project is non-project action and as such would not directly impact environmentally sensitive areas or areas designated for governmental protection.

Future project-specific development proposals that may result in these impacts would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code and SEPA procedures. As specific changes are proposed in the future phases careful consideration will be given to possible impacts to the listed categories, relating to the specifics of such proposals.

Future actions will comply with SEPA regulations, and the City of Tacoma has a robust regulatory framework and code designed to protect shorelines, species, habitat and critical areas, as well as historical resources. This code meets and exceeds federal and state requirements. The City of Tacoma works to closely consult with The Puyallup Tribe of Indians and will continue doing so on future phases of this proposal to ensure key resources and concerns are not overlooked.

**5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?**

This phase of the Home in Tacoma Project is non-project action and as such would not directly impact environmentally sensitive areas or areas designated for governmental protection.

The project does not propose any changes to permitted housing types or densities within the Shoreline Districts subject to the SMP. General housing policies and housing affordability incentives would apply citywide in areas where housing is permitted. This includes shoreline districts. These would be reviewed in phase 2 zoning and standards.

**Proposed measures to avoid or reduce shoreline and land use impacts are:**

This phase of the Home in Tacoma Project is non-project action and as such would not directly impact environmentally sensitive areas or areas designated for governmental protection.

Future Phases of the Home in Tacoma Project will undergo a SEPA evaluation and at that time careful consideration will be paid do any possible negative impact to Shoreline. Project-specific development proposals that may result in these impacts would be reviewed, and properly mitigated, at the permitting level consistent with the applicable provisions of the Tacoma Municipal Code and SEPA procedures. The future phase of the Home in Tacoma Project will undergo a SEPA evaluation and specific possible impacts will be considered and called out as part of that process.

All development within the City of Tacoma Shoreline areas is subject to federal and state law as well as city of Tacoma Shoreline and Critical Area code as well as the provisions of the Shoreline Master Program.

Land Use impacts will also be evaluated; however, the focus of the Home in Tacoma Program is to enhance the Land Use policies and practices within the City of Tacoma. It is anticipated that the result will be an improved Land Use code with improved land use practices that are more compliant with the goals and tenants of the GMA and of PSRC Vision 2050.

**6. How would the proposal be likely to increase demands on transportation or public services and utilities?**

The Home in Tacoma Project is a non-project action and as such would not directly impact the transportation system or pubic services and utilities.

In general the cost of providing service on a per-capita basis is higher in lower density areas, simply given the amount of curb, gutter, sidewalk, linear foot of electrical transmission line, water, storm and sewer pipe. Lower density development is more costly to maintain and collected property taxes and fees do not fully recapture these costs particularly in the long run. A more densely developed environment is more efficient in terms of service provided to residents on a per capita basis. More specific study would be needed to evaluate the full cost breakdown and to identify density levels in Tacoma that would represent the maximum efficiency level in terms of service availability versus density.

The key mitigation is to devote necessary time and resources to answering the questions around infrastructural capacity, across the board, so that information may be utilized in development of implementation of the Home in Tacoma Project.

As a Metropolitan City, Tacoma is generally well-positioned to accommodate growth. Furthermore, the City has the regulatory, infrastructure and other processes and standards in place to address the majority of impacts that can be anticipated to result from these proposals, with the exception that additional analysis and potential actions are required to ensure that development is supported by adequate infrastructure and services in support of upcoming zoning changes.

**Mitigation – Infrastructure capacity and needs analysis specific to the possible Areawide Rezoning and Zoning and Development Code Changes:**

During development of the Home in Tacoma Program a series of meetings were held with key stakeholder groups, including potentially impacted City of Tacoma departments and divisions, as well as key community partners such as Pierce Transit, Pierce County Health District and Metro Parks Tacoma.

During these meetings concerns about potential localized infrastructure capacity issues was expressed, these concerns have led to the recommended mitigation in this SEPA determination.

By adopting these policy changes, the City Council acknowledges that further study is necessary to identify infrastructure and services actions likely be needed to support housing growth as implementing actions are taken.

As a Metropolitan City, Tacoma is generally well-positioned to accommodate growth. Furthermore, the City has the regulatory, infrastructure and other processes and standards in place to address the majority of impacts that can be anticipated to result from these proposals, with the exception that additional analysis and potential actions are required to ensure that development is supported by adequate infrastructure and services in support of upcoming zoning changes.

#### Analysis Key Points

- Timing – Before further phases and implementation may occur for the Home in Tacoma Program, additional data must be gathered on infrastructural capacity and needs. Having this information in support of potential areawide rezoning and major revision to TMC 13 land use and development codes will ensure that the City can meet its requirements to provide infrastructure concurrent with growth.
  - Evaluation of potential increase or change to housing development; amount, type, location.
  - Review of infrastructure and service capacity to support the projected growth.
  - Identification and initiation of actions to ensure that infrastructure and services can be provided concurrently with new development citywide.
- Working with infrastructure providers to ensure that the data captured and analyzed is sufficient to move forward to subsequent phases.
- Work quickly and efficiently. This mitigation is not anticipated to significantly delay this project, nor is it the intent of this mitigation for it to be used as such.

#### **Comments from stakeholders gathered during several meetings as this SEPA Checklist has been developed:**

**City of Tacoma Public Works/Transportation** – General concerns have been expressed about funding to enhance and simply maintain existing city infrastructure in order to meet current demand and any added demand such measures would have. Implementation of impact fees was mentioned as being an essential component for Public Works to be able to maintain and improve levels of service if substantial increases to population and allowed densities occur.

The Growth Management Act (GMA) requires that the City's Transportation Master Plan support the land uses envisioned in the Comprehensive Plan. Thus, an important component of the TMP's development was forecasting how growth in the City, as well as throughout the region, would influence demand on Tacoma's transportation network.

The travel demand modeling used in 2015 assumed a population increase of 127,000 new residents (based on an average 2.32 people per household, this roughly translates to 54,000 new housing units). Of this target, 9,300 units are planned for non-mixed-use centers. While the City's land use policies support concentrating dense new housing in centers, the Plan also supports some distribution of new housing throughout the City. This is an estimate which is in line with the modeling being used to develop the Home in Tacoma project.

Based on the 2015 Travel Demand Analysis, which worked with general population assumptions that are aligned with those used in the Home in Tacoma Project analysis. In general, the City's network has sufficient capacity to absorb the forecast growth. The most significant travel delays on the City's network are a result of backups on the regional network, rather than local-level capacity constraints; however, only a small portion of the City's system is expected to exceed capacity and will do so only for a small part of the day. The forecast operations would meet existing standards for concurrency.

While the City's adopted level of service standards are based on long-term growth expectations, concurrency is managed on a permit basis and through ongoing capital facility planning which enables the City to be more responsive to locations where growth is occurring and to adaptively manage service provision. Capital facility planning would need to incorporate the Home in Tacoma Project in future years.

The City of Tacoma Public works department has expressed concern though that the Home in Tacoma Project may have significant localized impacts in a variety of ways from adequate street signage and signalization to overall maintenance service provision.

**Tacoma Fire** – General concerns were stated regarding capacity of personnel and emergency apparatus. A major expressed concern was regarding the availability of station/facilities geographically dispersed enough to handle the potential increases in calls for service; given the proposal's focus on shifting growth in more distributed fashion this could cause particular issues.

**Pierce Transit** – Pierce Transit is supportive of the Home in Tacoma project conceptually and finds that it aligns with the long-range planning efforts of that agency. Generally dense growth in Tacoma along existing transit lines will be good for the fixed route bus system and for Pierce Transit overall. Increased population and density would encourage more transit ridership and could also help further the focus on Bus Rapid Transit lines.

If demand increases to a certain level, a focus on Bus Rapid Transit Lines (BRT) and more routes with greater frequency of service may be required. This would cause an increase in resource demand on the system, and possibly a need to identify further/additional revenue sources. Pierce Transit has identified BRT as a logical next step in the transit progression of the agency as a mode which can handle more passengers, in way in which ridership can continue to grow.

**Tacoma Pierce County Health Department**– The Pierce County Health District is supportive of the Home in Tacoma Project as it aligns with district goals of protecting a clean and healthy environment, encouraging use of mass transit and active transit modes, and generally developing dense walkable communities. TPCHD provided general encouragement to ensure that the Home in Tacoma Project maintains and increases transit concurrency; increased public education around the Home in Tacoma project and affordable housing; use of a neighborhood planning program to help development strategies to combat displacement; development of programs to help support job-housing balance; and encouragement to continue focus on equity and racial justice.

**Tacoma Power** – Overall the feedback received from utilities has been one of general interest and a desire on the part of the utilities to learn more about the proposal and the request for greater detail in terms of growth projections. This is a multi-phased project and much of the concerns would be more applicable during a later phase with possible site rezonings, etc.

Tacoma Power has identified the following potential impacts to its infrastructure, as well as its suggested steps to avoid or reduce impacts. This may also include added requirements for setbacks and undergrounding.

The majority of the Home in Tacoma area of focus has existing overhead electrical distribution and, in some cases, electrical transmission. New policies must account for required clearances from electrical infrastructure.

- A 14' horizontal, 18' vertical building clearance from overhead distribution lines is required. If rezoning changes footprint or height of buildings within a parcel, these clearances must still be adhered to, in keeping with state and national standards.
- Transmission lines require significantly larger clearances depending on the voltage level.
- Tacoma Power's design practices prohibit permanent structures under all lines.
- Distribution systems can be relocated underground. The design of the underground system is very specific to the location and will likely extend beyond the limits of the parcel(s). Development would bear the cost of the relocation.



- The relocation of overhead and underground systems is expensive and complicated. It often requires duct bank systems and additional padmount switching around the perimeter of the project and into higher density road and sidewalk areas. New underground infrastructure must coexist and find space among other existing buried utilities, making future maintenance of existing and new utilities difficult. If maintenance in an area is too complex, undergrounding line infrastructure will not be possible.

#### ALLEY VACATIONS

- Rezoning that includes vacation of alleys should be avoided in cases where power infrastructure exists within the alley.

#### EXISTING CAPACITY LIMITS

After reviewing the provided growth projection data, the following impacts are likely to result from a change to rezoning. These results are not drastically different from the typical area load growth and are, therefore, not a major source of concern.

- Local service transformer upgrades o Placement of transformer or service boxes may be required within developing parcels, reducing possible building footprint.
- Distribution line capacity upgrades and/or extensions to accommodate new services
- New lines or substations to address increased load

#### IMPACTS TO OTHER CUSTOMERS

- Repurposing of parcels may result in alterations to the existing services of adjacent customers. These alterations may include easements, relocation, and/or conversion to underground. Developers will bear the cost of changes to the system.
- Alterations to existing services and replacement of service transformers will mean temporary outages while the work is completed.
- New generation resources and transmission capacity upgrades will be costly and will affect electrical rates for all customers.

**Tacoma Public Schools** – TPS stated general concerns about future specific localized impacts, as many schools have major site constraints in terms of room for expansion. The need to consider modifying city code/development processes to be more responsive to this were expressed. Overall Tacoma Schools expressed that general capacity levels are good and that the district overall could accommodate the growth, it would just be a matter of possibly needing to look at redrawing boundaries.

**Metro Parks Tacoma** – Metro Parks Tacoma had generally supportive comments about the effort; however, overall capacity is an ongoing concern and effort to ensure that park facilities are adequately distributed with increasing population and population density would take ongoing effort. A need for increased partnership between the City of Tacoma and Metro Parks was brought up regarding how parks are maintained. Depending on levels of new growth and localized increases in density, funding needed park expansions and additions could trigger a need for increased funding.

**Water** – Tacoma Water has identified the following impacts to its infrastructure and compiled the following comments for consideration. Above all, Tacoma’s water supply can support this land use change in the short and long term.

#### IMPACT BY INCREASED GROWTH:

The biggest impact of the proposal is the potential increase growth in older parts of the Water system that will result in:

- Increased Demand: If land use result in the sought changes, there will be an increase in customers in the oldest parts of the system. It is unclear if this will increase Maximum Day / Peak Hour Demand. We could consult other purveyors, such as Seattle on their experience. The

average day demand will certainly increase; however, that is not currently an issue from a system planning perspective.

- 8" Mains to Support Higher Fire Flows: Middle-housing style homes can have higher than minimum fire flows (as well as closer hydrant spacing requirements). We often replace older 6" mains with "like" in single family residential zone areas. In areas within the proposed buffers, we will likely need to standardize to 8" mains to support a higher fire flows. Additionally, areas with lower available fire flows (high elevation, less looping, etc.) may also need to go to 8" replacements.
- Funding to address cumulative impacts: Most small lot developments will not require water main improvements. However, over time the small lot additions can cumulatively impact on the system. At that point, the slim profit margins to complete the small lot improvements may not be enough to construct the required water main improvements. So this highlights the need for future evaluations on Water system planning focusing on development impacts and equitable customer rates and charges.
- Developers may have to install a new fire hydrant at their cost. Tacoma Water installs on a Time and Material basis if the current spacing in the residential zone is not adequate for their project.

#### SYSTEM DEVELOPMENT CHARGE (SDC):

While the proposal intends to increase density in Tacoma, this is unlikely to have a significant impact on SDCs. We'll evaluate the SDC model with data from the consultants when available.

- SDC Structure: With a potential increase in mixed use buildings, creating a new charge to blend the residential and commercial charge could be a possibility.
- Deferments or Waivers as incentives for affordability developments: This was discussed a few years ago regarding ADUs. If there is interest, we could revisit this topic and the mechanics behind how it could work.

#### UTILITY SETBACKS AND WATER STANDARDS:

- There is an increased desire at the state legislative level for each living unit and tenant to have access to their own water meter data. For the smaller units that is practical with individual Tacoma Water meters. For the higher level units, that's likely more efficiently accomplished with a private vendor meter on private property side plumbing.
- Serving multiple dwelling units with one water meter is acceptable on one parcel. The water meter account must stay in the landlords name in this situation. Only if each unit has a separate meter can the account be placed in tenants' name.
- Adding the new water service lines and meters for the infill areas may have challenges to maintain our standard separation requirements around existing and new structures in the ROW. We usually see challenges with utility separation requirements from dry underground utilities, side sewers, private irrigation sprinkler systems, and trees.
- We strongly prefer locating the water meters and vaults outside of paved areas (driveways/sidewalks). This has increased challenges with maintenance and the renewal cost are much higher when it includes concrete restoration.
- This is typically unavoidable in downtown developments and may also be the case in the medium scale (upper end of missing middle housing types) on the corridors where there is only sidewalk between property edge/edge of building and the curb. More discussions are required with Traffic and ES staff on locating water meter vaults that will satisfy each stakeholder requirements to create a safe and enjoyable space in the ROW while providing the necessary utility services to the buildings.
- When we are unable to achieve these separations or locate the meter box in unpaved surfaces, the alternative is to bring the utility facilities onto the private property which requires easements. Easements have challenges to manage, particularly when customers encroach into them with

expensive landscape, fences, sheds, etc. This also encumbers the property and may reduce the # of units that the property can yield.

- There are increased maintenance costs to Tacoma Water for meters & boxes located in paved surfaces and when other nonstandard installations exist. These situations occur when we are pressured by developers for the sake of economic development to keep construction costs to a minimum and field conditions have limited options and constraints. We must responsibly manage the Water infrastructure with the long range vision of 100 years or more. Making sure we hold tight to standards, easements and preferred locations helps to minimize the long term costs of owning and operating that infrastructure and likely greatly exceeds the cost of the install itself. We must evaluate the long term tradeoffs when trying to help save a few hundred to a few thousand dollars for a developer.

#### PAVEMENT AND ROW RESTORATION:

The paving cost is sometimes a surprising line item to the new water service cost for the developer. Public Works decides the limits for the paving cuts for new water main taps and service line installations. The infill may create situations where there are multiple street cuts for new sewer & water connections on the same block that require the developer to incorporate adjacent patches from previous infill projects.

- Developers pay Tacoma Water for these paving restoration costs with the new water service construction costs and ideally the paving costs are recoverable with our fixed fee construction cost structure.
- For extraordinary paving costs where the fixed fee cost structure is not adequate, the alternatives are for the developer/contractor to use the Work Order process or by paying Tacoma Water actuals on a Time and Materials basis.
- Street moratoriums may delay the infill projects or require much larger paving limits and costs to developer
- City ES began charging a new permit fee for ROW restoration inspection in 2020. This fee, and other potential new ones, are collected by Tacoma Water and charged to the developer.

#### FIRE PROTECTION:

From city of Tacoma Fire Engineer/Review 3 or more units require a fire sprinkler system. This increases the construction and utility service cost for developers and tenants.

- For the developers, this increases the building construction costs to design and install this protection system.
- All fire sprinkler systems require a backflow device installed after the water meter. Developer to pay for installation and testing. Owner to pay for testing and maintenance.
- For Developer, SDC will increase proportional to the size of the fire/domestic combination meters.
- For the tenants/landlords, having a dedicated fire service or fire/domestic combination meter will have higher monthly standby charges.
- Currently, we do not offer a 1" fire/domestic combination meter. Should this size option be a common solution for the middle housing building units, we would have to update the ordinance.

#### OTHER:

Should the South Tacoma Groundwater Protection District be evaluated as an exclusion area to the higher density? Further evaluation required.

**Environmental Services** – The following comments are from a response letter dated February 26, 2021 (attached)

## WASTEWATER

Potential Impacts due to future phase Zoning Changes:

Due to the Citywide proposed zoning changes, the wastewater utility would need to perform the following to ensure capacity for the proposed growth:

- Evaluate the Central Wastewater Treatment Plant capacity
- Evaluate the collection system for the Central Treatment Plant
- Evaluate Pump Stations within the Central Treatment Plant tributary area
- Evaluate the North End Wastewater Treatment Plant capacity
- Evaluate the collection system for the North End Treatment Plant
- Evaluate Pump Stations within the North End Treatment Plant tributary area
- Evaluate the collection system served by Pierce County Chambers Bay Treatment Plant
- Evaluate Pump Stations within area serviced by Pierce County Chambers Bay Treatment Plant
- Evaluate impacts to the inter-local agreement with Pierce County The collection system was sized for single-family home use in many neighborhoods around Tacoma. Increased density may require upsizing many of the 500 miles of underground sewer pipes and upsizing many of the existing 48 sewer pump stations. In addition to evaluating the impact to the existing infrastructure, the utility would also need evaluate the financial impacts of addressing any required capacity improvements.

This could result in:

- Higher utility rates
- Implementation of a System Development Charge

These additional costs could affect the goal of affordable housing.

## SOLID WASTE

- Accessibility will be an issue for collection of solid waste containers.
- Collection system design standards need to be included in this plan otherwise there will be service impacts to the customers. With increased number of vehicles in the neighborhoods, this will impede service efficiency, negatively impact customer service and create unsafe collection environment for drivers and pedestrians.
- Alley improvements will be required in some cases.
- Unsightly curb appeal resulting from more containers left out on the curb.
- Inadequate number of storage locations and enclosures for solid waste containers.
- Increased blight, illegal dumping and code violations for multifamily properties. Renters are not vested in multifamily properties and have an increased number of code complaints and violations.
- Requires an additional plan review and approval process.
- Collection routing and billing impacts. Moving customers from residential to commercial status. Updating accounts, service levels and changes to minimum service.
- Increased carbon footprint and neighborhood impacts. Weekly collection will contribute to traffic and noise complaints in the residential neighborhoods.
- Requires changes to TMC 12.09 – Definitions, Residential and Commercial customer designations, potential language for shared services.

## STORMWATER

- Policies and codes developed for the Home in Tacoma Project should be consistent with the City of Tacoma Stormwater Management Manual, Tacoma Municipal Code 12.08 and the Right-of-Way Design Manual.
- Incentives, if utilized, should be designed to not only promote specific housing types but, where possible, to encourage the use of low impact development as the preferred and commonly used approach for stormwater management.
- Impervious surface limits should be considered for affected zoning types. If impervious surface limitations are not enacted, on-site stormwater management including the use of low impact development on-site management best management practices may be determined infeasible on more sites due to lack of available space. Modeling should be conducted to ensure the current stormwater system has the capacity to manage additional runoff from the increase of impervious areas. Climate scenarios show storm intensities increasing overtime. This in combination with additional impervious areas could increase the risk of localized flooding.
- Changes to lot setback requirements for structures may also effect the feasibility of onsite management and low impact development best management practices. Environmental Services would like to be included in discussion regarding changes to lot setbacks.
- Policies should encourage retention of existing low impact development mitigation best management practices (BMPs) unless those BMPs are replaced with equivalent BMPs either on the project site or in a regional facility.

#### OPEN SPACE AND URBAN FORESTRY:

The GMA requires cities to designate natural resource lands, including those related to forestry, critical areas, and open space, and identify specific steps to preserve them. The City has taken steps towards this effort, specifically through the adoption of the Urban Forest Policy Element of the Comprehensive Plan (2010), the Environmental Action Plan (2016), and the urban Forest Management Plan (2019), where trees and open spaces are designated as critical infrastructure, and essential to the health of our community.

The City of Tacoma continues to have the lowest assessed tree canopy in the Puget Sound Region, and has poorer access to community open space than our neighboring communities. These impacts are disproportionately felt in our low-opportunity neighborhoods, with some census blocks having as little as 2% tree canopy cover. With the projected density increase from the Home in Tacoma proposal, a further decline in tree canopy, open space access, and plantable space will result if there are not appropriate measures in place to protect or enhance our natural resources.

- Policies and codes developed for the Home in Tacoma Project should be consistent with the Urban Forest Management Plan (2019) and Urban Forest Manual (2014).
- With increased density and allowance for more units through infill development, we would expect to see more surface area of residential lots to be covered with impervious surface (buildings, driveways, and other amenities), which would result in:
  - Removal of existing trees and greenspaces to accommodate for new infrastructure;
  - less opportunities for future Low Impact Development (LID), including tree planting; o an increase in stormwater runoff;
  - an increase in the urban heat island effect; and
  - less carbon sequestration and pollutant removal from green infrastructure.

**Mature Tree Loss** - The most detrimental impact to tree canopy comes from the removal of existing mature trees, most frequently seen during the development or redevelopment process. Tacoma currently does not have any tree protections outside of regulated critical areas, and by increasing the rate of development, we would expect to see an increase in the removal of existing mature trees, unless regulatory protections are in place.

Health Impacts to Underserved Neighborhoods - Tacoma's historically underserved neighborhoods have a drastically lower than the City average green space tree canopy. Analysis has concluded that we already cannot meet the Council adopted 30% tree canopy in these underserved neighborhoods, due to impervious land availability. Urban heat is directly correlated to green space/tree canopy and impervious surface. Further increasing impervious surfaces in these neighborhoods would have more severe negative health consequences in these already health-burdened neighborhoods.

Reduced Potential to Increase Tree Canopy - Currently, 46% of the City is zoned as single family residential (SFR), an area of the City that does not have tree planting requirements or tree protection (outside of regulated critical areas). In SFR zoned areas, there is a current tree canopy of 17% (goal of 30%). An analysis looked at current impervious and pervious surface coverage across the City, and what would be feasible to convert to tree canopy, known as "potential tree planting area". Currently, these SFR zoned areas have a 16% potential planting area. Out of all of the other land uses combined, the potential planting area in Single Family makes up for 57% of the total potential planting area available within the City. If SFR zoned areas significantly increase in impermeable lot coverage, we will not only see a loss in existing tree canopy, but we will remove the potential to increase tree canopy in the future.

The City should model the potential impacts to impervious surface/land cover change for the Home In Tacoma proposal, and consider regulatory approaches to preserve and enhance our natural resources in compliance with the GMA and Council adopted policy to enhance our urban forest asset. This should include adequate tree protections for right-of-way trees as well as a consideration for protection of private property trees of significance. This should also include professional capacity to assist with plan review, inspections, enforcement, and standards development to ensure the community has adequate resources to be successful in preserving and enhancing tree canopy.

Any planned up zoning should exclude areas currently designated as critical areas, or Fish and Wildlife Habitat Conservation Areas. These areas are intended to be low density and preserved to comply with the requirements of the GMA.

The City should plan to reassess its tree canopy coverage in 2030, and at regular intervals in the future, to determine if the increase in density is having a significant impact on tree canopy.

## Meetings:

In advance of developing the SEPA Decision and checklist City of Tacoma Planning and Development Services staff conducted a series of meetings with administration and staff with the following departments regarding the Home in Tacoma project (see attachments)

- External stakeholders:
  - Tacoma Public Schools
  - Pierce Transit
  - Metro Parks Tacoma
  - Tacoma Pierce County Health Department
- City of Tacoma Departments:
  - Public Works
  - Fire
  - Community and Economic Development
    - Housing Division
    - Economic Development Division
  - Environmental Services
    - Sewer
    - Solid Waste
    - Stormwater
    - Urban Forestry

- Open Space
    - Solid Waste
  - Tacoma Public Utilities
    - Government Affairs
    - Power
    - Water
  - Planning and Development Services
    - Current Planning
    - Building & safety
    - Permit review

Consultation timeline:

- Request for consultation – December 2020
- Information and discussion meetings
  - 02/25/21 SEPA Q & A Session
  - 02/08/21 Green and sustainable housing work session
  - 02/02/21 Infill Design work session
  - 02/03/21 Green and sustainable housing work session
  - 01/28/21 Tacoma Fire Department consultation
  - 01/19/21 Housing and access for people with disabilities work session
  - 01/14/21 Sustainable, resilient and affordable housing work session
  - 01/14/21 Review Panel
  - 01/11/21 Antidisplacement and antiracism work session
  - 01/11/21 Affordable Housing Incentives work session
  - 01/06/21 Infill Design strategies and strategies to reduce demolitions work session
  - 12/16/20 Land Use Group consultation
  - Biweekly – Home In Tacoma Project Coordination Meetings

**7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.**

In general, the Home in Tacoma Project seeks to protect the natural and built environment, so conflicts with local, state or federal laws for the protection of the environment are not anticipated. Furthermore, the proposal package is being reviewed for consistency with the Washington Growth Management Act, the Washington Shoreline Management Act, the Puget Sound Regional Council Vision 2050 and the Pierce County Countywide Planning Policies. If conflicts with local, state or federal laws for the protection of the environment are identified, they will be rectified prior to adoption.

## Attachment/exhibits

- Public Review Documents (available at [cityoftacoma.org/homeintacoma](http://cityoftacoma.org/homeintacoma))
  - Staff Report
  - Proposed Comprehensive Plan and Minor Code Amendments
  - Housing Action Plan
  - Housing Equity Taskforce Recommendations
  - Existing Conditions Report
- Growth Memo
- Comments from key stakeholders
  - Pierce County Council Letter of Support
  - City of Tacoma Fire Department
  - City of Tacoma Environmental Services Department
  - Metro Parks Tacoma
  - Pierce Transit
  - City of Tacoma Public Works Department
  - Tacoma Power
  - Tacoma Water