

March 8, 2023

Landmarks Preservation Commission
Planning and Development Services Department
747 Market Street, Room 345
Tacoma, WA 98402

Re: Nomination of the College Park National Historic District to the Tacoma Register of Historic Places.

Dear Members of the Tacoma Landmarks Preservation Commission,

As a resident of this neighborhood for over 25 years and an Architect with 37 years of profession experience in working with historic preservation planning and adaptive reuse projects; it is my honor to submit the attached application for the listing of the College Park National Historic District to the Tacoma Register of Historic Places and its designation as a Historic Special Review District, for your review.

The Nomination of the College Park National Historic District to the Tacoma Register of historic places meets all the current requirements stated in the Tacoma Municipal Code for a Special Review Overlay District, a Local historic District within the City of Tacoma, TMC 13.07.060, A

- The district meets the basic requirements for consideration, the average age of the structures within the district is 99 year, with an average construction date of 1924
- The district has demonstrated a high level of significant by its listing on the National Register of Historic Places, the nation's highest honor for an historic district. This nomination was based on over 25 years of research on the district's and Tacoma's history and my professional experience in historic preservation and preparation of historic nomination to local, state and national registers.
- The boundary selected for the district was reviewed by the Washington State Department of Archeology and Historic Preservation and found to meet the stated criteria for both the state and national requirements. The National Register nomination was in turn reviewed by the Governor's Council on Historic Preservation, the U. S. Parks Department and the Department of the Interior before being signed by the Washington State Preservation Officer. This nomination also received an award from the TLPC as an outstanding nomination in 2019.
- With over six years of outreach, we have a substantial number of residents in support of this nomination and who have signed in favor of its listing. The creation of the district is supported by both community and neighborhoods plans as well as the One in Tacoma Comprehensive Plan.

- The district abuts the Buckley Addition Historic District and is adjacent to two National Registered structures; Engine House No. 9 and the Cushman and Adams Street Substation structures and sites both are within two blocks of the districts boundary.
- The objective of the community cannot be adequately address without the local historic designation include, the stated objectives for our community, the city lead design review process for the district and tax incentive to offset restoration and modernization costs for both single and multi-family structures.

This nomination has been submitted in good faith, following the guidelines set in the TMC in the hopes of honoring our neighborhood's past and I ask that it be treated in the same light. We request a fair administrative review, a nonbiased arbitration of our finds based on the current requirements of the Tacoma Municipal Code (TMC), in accordance with the Washington State Appearance of Fairness Doctrines, RCW 42.36. An administrative review based on the stated city policies for the listing of a local historic district within the City of Tacoma. A review supported by facts, not accusations and misinformation. A review of the nomination without prejudice, personal bias, misinformation and false or misleading statements by members of the commission, a review based on approved city policy not personal opinion.

This nomination has been submitted in support of a working and middle class neighborhood that has been an active part of this city for over 130 years. My wish is too simple honor this place and its proud history. There are no alternative reasons or facts for this nomination. It is not based on fear or concerns or a made up threat as suggested by those in opposition to this listing. Likewise it is not our intent to "create a gated community" as some have stated. We are and have been a welcoming neighborhood to all and I do not expect that to change with a local listing and a design review process lead by the City of Tacoma, not the residents of the community as some have suggested. The listing of a district as historic has been found to stabilize housing costs; it neither lowers the value nor raises it. It does however attract those who appreciate the qualities of old homes and neighborhoods; it builds stronger communities and pride of place. Goals stated in the One in Tacoma Plan for the city.

The Role of city commissions:

As an administrative body within the city, the commissions are limited to the powers granted them under the City Charter and do not have the right under the City Charter or State Law to add or revise the approve process or requirements. Only the legislative branch of the city, the City Council has that right and only prior to an application. If a member of the commission has a personal stake in the outcome of this review and cannot review this application as a neutral arbitrator based on facts and the merits expressed in this nomination, they should recuse themselves from the discussion and the meeting. City commissions were created to advise the council by representing all residents equally under the Charter, without bias based on race, age, ethnicity, religion and geographic

location within the city. Judgmental and bias statements to further personal goals or opinions have no place in this review process; racism and racially charged statements also have no place in our society. It is unfortunate, based on our last submittal process that this needs to be pointed out. We expect our rights under the first, fifth and fourteenth amends to the US construction to be followed during this review process, insuring an open discussion with the chance for a rebuttal statement of facts presented by commissioners or the public that we feel are misleading. A fair and neutral hearing and review of this application on its merits and an equal treatment under the law, these are the tenets of Due Process and Equal Protection found in the fourteenth amendment of the US Constitution. This is a right given to all citizens for a fair and just review. In short I am looking for a different review process from our first submittal before the City of Tacoma, an open, fair and equitable review process.

The need for a fair review based on facts:

During the review of the last submittal a few commissioners in both the TLPC and TPC review process made openly misleading statements about our city & district and its history that have been proven to be false. For example there is no history of racism or racist acts within our district. No restrictive covenants, deeds or ordnances have been found within the history of this district. Both our research and that of the University of Washington have shown these statements of racism and redlining to be misleading at best. During the review process there were also questions that were raised that were already addressed in the original nomination documents, such as information of the past residents and their profession by property. Please take the time to read the nomination prior to the meetings to reduce confusion and ask questions directly while allow us to answer the questions in real time. In an effort to address some of the previously stated concerns and questions by both the commissions and public, many of which fall outside the stated requirements for the nomination, a supplemental section has been added to the nomination, this includes information on issues such as demographics and the issue of redlining as well other items of note.

In the previous review by the Commissions, there was accusation by the TLPC Chair in the first meeting that suggested this nomination was presented to the residents as a way of stopping the Home in Tacoma Project and that this nomination was a reaction to the city's proposal, That was not a true statement, but a misleading statement made in support of the opposition to our request for listing and possible historic districts in general. Nationally this type of rhetoric has been used quite often in recent years by those in opposition to historic status. This listing will not stop the Home in Tacoma Project and we have specifically stayed outside of that discuss to avoid this kind of claim. Our efforts for a listing also started well before there was a Home in Tacoma Project under consideration, so the timeline does not suggest any reaction on our part. I would also not suggest that the Home in Tacoma Project was reaction to our nomination efforts; the two are not related or based on the actions of either party. If individual owner felt this was a favorable choice due to the Home in Tacoma project that was a personal choice on their part. These kinds of accusations are groundless and intentionally misleading, but this does bring the chairs neutrality and ethics regarding our request into question. We

strongly suggest he recuse himself as a resident of the district and active member in the opposition from future proceedings in order to provide a fair review.

The need for more historic district:

Currently less than 1% of the city's residential area is within a local historic district, according to the Washington Trust for Historic Preservation. Less than 3% including all historic districts local, state and national, how does this small area of the overall city impact the goals of Home in Tacoma or the wishes of builders and developers to construct new housing projects? Historic Districts in general, based on national independent academic studies, have been found to be both diverse and affordable parts of cities that embrace them, a positive addition to any city. Diversity and affordability are some of the same stated goals found within the proposed Home in Tacoma Project, along with the need for design review in commercial construction and to "*Protect the character of historic districts and promote reuse of existing structures*". We appear to be in alignment with these stated goals and are of limited impact to the current plans proposed by the city to increase housing opportunities. It is unclear why some who oppose historic districts are fearful of a listing since historic districts have proven time and again to benefit a city and its residents. Our nomination meets with the current community and neighborhood plans found within the One Tacoma Comprehensive plan. Historic districts are a vital part of any city and should be promoted where possible in the limited areas that can still support them. Retention and good stewardship of our cultural heritage is important and an asset to the City and local community.

Building stronger Communities through community support:

The creation of an historic district brings residents together for a common cause and the hope of a broader conversation on the community's goals and wishes going into the future. We are simply looking for that discussion through the City's stated process, one that is open to all neighborhoods to apply. This effort is a way to improve the city as a whole as well as our small part of that city. To speak against this effort to build a stronger community is to speak against a community voice in city planning and its future.

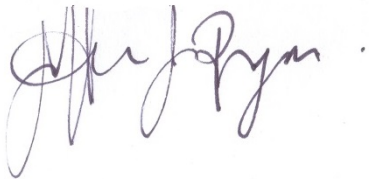
This nomination was first submitted to the city about two years ago with a substantial level of support and that support has only grown with time as we have been asked to recanvas the neighborhood for comments and signatures or both nomination and appeal process. To date we have received support from over 65% of the residents of the districts and over 55% of the Property Owners, while currently there are less than 11% noting opposition to the listing a three point drop, from last time. The remaining residents of the district are either neutral on the subject or have yet to reply to our multiple attempts for comment. We will continue to reach out for their support and to answer their questions or concerns. These new numbers shows both a substantial level of support as required by the TMC and a majority support for the listing of our neighborhood to the Tacoma Register of Historic Places. I have attached a list of the property owners that have express support so far and a map highlighting each location based on a request last time by a commissioner.

Summary:

I ask for your continued support in our neighborhoods efforts for a local listing and your approval of our nomination to the Tacoma Register of Historic Places. This effort could not have been possible without the many volunteer that made this day possible. I look forward to talking to you in more detail this time in person at your earliest convenience.

Thank you for your time and attention to this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Ryan".

Jeff Ryan, Architect
LEED BD+C

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Attachments:

Tacoma Register of Historic Places Nomination Form
Tacoma Register of Historic Places supplemental information
Map of College Park National Historic District
List of Neighborhood supporters and map.
Current Building Inventory, Primary Structures
National Register Nomination
Letter of support

Supporting articles and reference information
Preservation Positive, LA Study
The Greenest Building Exec Summary
The Wedge Historic District Staff Report 2010