



AGENDA

MEETING: Regular Meeting (Hybrid) ←

DATE/TIME: Wednesday, October 5, 2022, 5:00 p.m.

LOCATION: Council Chambers
1st Floor of the Tacoma Municipal Building
747 Market Street, Tacoma, WA 98402

ZOOM INFO: Link: <https://www.zoom.us/j/88403846060>
Dial-in: +1 253 215 8782
ID: 884 0384 6060

Starting October 5, 2022, all Planning Commission meetings will be conducted in-person at the location as noted. Electronic participation in meetings is allowed and will be accommodated via Zoom as indicated. All meetings are open to the public.

A. Call to Order

- Quorum Call
- Land Acknowledgement

B. Approval of Agenda

C. Approval of Minutes

- There are no meeting minutes to approve.

D. Public Comments

- Written comments on Discussion Items are accepted via email and must be submitted by 12:00 noon on the meeting day; e-mail to planning@cityoftacoma.org.

E. Disclosure of Contacts

F. Discussion Items

1. College Park Historic Special Review District

- Description: Review preliminary draft findings of facts and deliberate potential recommendations.
- Action: Review and Comment
- Staff Contact: Reuben McKnight (RMcknight@cityoftacoma.org)

G. Upcoming Meetings (Tentative Agendas)

(1) October 19, 2022 (hybrid)

- Urban Design Review Program
- Home In Tacoma Phase 2
- Tideflats Subarea Plan & EIS



- (2) November 2, 2022 (Hybrid)
 - College Park Historic Special Review District
 - 2023 Amendment – “Mor Furniture”
 - Pacific Avenue Corridor Subarea Plan & EIS (“Picture Pac Ave”)
- (3) November 16, 2022 (Hybrid)
 - South Tacoma Groundwater Protection District – Moratorium and Code Amendments
 - Urban Design Review Program
 - 2023 Amendment – “Electric Fences”
 - 2023 Amendment – “Shipping Containers”

H. Communication Items

- (1) **BRT Stream System Expansion Study** – Letter of support from the Sustainable Tacoma Commission (STC) to the Infrastructure, Planning and Sustainability Committee (IPS), September 17, 2022 (“Agenda Item H-1”)
- (2) **Proposed STGPD Moratorium** – Letter of support from the STC to the IPS, September 17, 2022 (“Agenda Item H-2”)
- (3) **Proctor Neighborhood Walking Tour** – Saturday, October 8, 2022, 10 AM; meet at the Wheelock Library, 3722 N. 26th St. (www.cityoftacoma.org/NeighborhoodPlanning)
- (4) **Status Reports by Commissioners** – TOD Advisory Group, Housing Equity Taskforce.
- (5) **IPS Agenda** – The Infrastructure, Planning, and Sustainability Committee’s next hybrid meeting is scheduled for Wednesday, October 12, 2022, at 4:30 p.m.; the agenda (tentatively) includes a presentation on the Home In Tacoma Project and an update on the Transfer of Development Rights. (Held at 747 Market Street, Tacoma WA 98402, Conference Room 248 or virtually at <http://www.zoom.us/j/87829056704>, passcode 614650)

I. Adjournment



To: Planning Commission
From: Reuben McKnight, Historic Preservation
Subject: **College Park Historic Special Review District Overlay Zone**
Memo Date: September 28, 2022
Meeting Date: October 5, 2022

Action Requested

Feedback and direction regarding potential Commission findings and recommendations regarding the College Park Historic District Overlay Zone.

Introduction

On June 1, 2022, the Planning Commission held a public hearing to hear comment on the proposed College Park Historic Special Review District. On August 3, the review of testimony from this hearing was transmitted to the Planning Commission for review, along with comments and responses from staff to Commissioner requests and questions, as a Communication Item. On September 7, staff provided a review of testimony and discussed responses to Commission inquiries, as well as presented feedback from the Office of Equity and Human Rights.

At the meeting on October 5, staff will provide a review of the proposal and relevant Comprehensive Plan policies, with the objective of identifying potential findings and ultimately a recommendation for formal consideration by the Commission in November.

The complete package is available at www.cityoftacoma.org/collegeparkHD.

Key Discussion Questions

Following a brief overview of relevant City and planning policies, staff will ask the Commission to provide guidance to facilitate concluding the review of the College Park application. Specifically, staff will seek guidance for the following questions:

1. Has the proposal been reviewed consistent with the required public process and notification? Does it have adequate public support?
2. Is the proposal consistent with applicable City codes and regulations?
3. Is the proposal consistent with City policies, particularly those within the Comprehensive Plan? If not, are there specific policy areas that are in conflict, and are there ways to amend the proposal to resolve those conflicts?
4. The Landmarks Commission recommendation includes recommendations to review historic district policies and process, and calls for identification of resources for work in underserved areas of the city. Does the Planning Commission concur with these recommendations?



Next Steps

Date	Subject
September 7, 2022	Review of testimony, commission requests, discussion and direction
October 5, 2022	Discussion and direction
November 2, 2022	Findings and Recommendations

Project Information:

Reuben McKnight, Historic Preservation Officer: rmcknigh@cityoftacoma.org

Attachments:

1. Discussion document

- c. Peter Huffman, Director



Planning Commission

Proposed College Park Historic Special Review District



TACOMA PLANNING COMMISSION FINDINGS AND RECOMMENDATIONS DISCUSSION DOCUMENT

The following is intended as a discussion document to review policies relevant to the College Park Historic District proposal, providing the basis for the Planning Commission's forthcoming Findings and Recommendations report tentatively scheduled for review on November 2, 2022. Some of this language was previously included in staff reports from August 3 and September 7, 2022.

Organization of Report

- A. Summary of Proposal
- B. Discussion
 - 1. Background
 - 2. Landmarks Commission Review
 - 3. Planning Commission Review
 - 4. Public Testimony and Summary of Community Engagement
 - 5. Commission Feedback and Comprehensive Plan Policy Review
- C. Conclusions

A. Summary of Proposal

This proposal, submitted by residents of the College Park Neighborhood in May 2021, would establish a new historic special review district as an overlay zone. The proposed area covers approximately 122 acres extending roughly from North 21st St to the north, to North Pine Street to the east, along North 8th to the south, along the eastern boundary of the University of Puget Sound Campus along Alder Street to the west, and along the northern boundary of the university campus on North 18th Street to North Union Avenue on the west.

This nomination is submitted and reviewed under the provisions and criteria of Tacoma Municipal Code (TMC) 13.07.060, which requires review by the Tacoma Landmarks Preservation Commission, Planning Commission and, if forwarded by the Planning Commission, approval by City Council.

The district is nominated as an example of a cohesive neighborhood that reflects the broad patterns and history of Tacoma as well as for the distinctive characteristics of its structures, which embody early twentieth century architecture. The proposed district consists of approximately 582 structures, 509 of which are classified as "contributing" in the preliminary building inventory submitted with the nomination package (for the local historic register, accessory structures are not inventoried, and this number reflects only the primary structures on the lot). The district consists primarily of detached residences built prior to World War II, with most constructed between 1910 and 1940 with an average construction date of 1924.

B. Discussion

Feedback from this discussion will provide staff the framework for developing the Findings and Recommendations of the Planning Commission.

1. Background

Comprehensive Plan and Land Use Regulatory Code

The *One Tacoma* Comprehensive Plan, updated in 2015 by Ordinance No. 28335, is Tacoma's comprehensive plan as required by the State Growth Management Act (GMA) and consists of several plan and program elements. As the City's official statement concerning future growth and development, the Comprehensive Plan sets forth goals, policies and strategies for the health, welfare and quality of life of Tacoma's residents. The Land Use Regulatory Code, Title 13 of the Tacoma Municipal Code (TMC), is the key regulatory mechanism that supports the Comprehensive Plan.

Specifically, the primary Comprehensive Plan Element relating to historic districts and historic preservation is the Historic Preservation Element of the Comprehensive Plan. Additional relevant language to this proposal is within other chapters of the *One Tacoma* document, including the chapters for Design Development, Urban Form, Housing and others.

Within TMC Title 13, Chapters 13.05, 13.06, 13.07 and 13.12 provide the basis for historic designations, design review, and environmental review for cultural and historic resources. Specifically, TMC 13.07 outlines the nomination process for historic districts.

Planning Mandates

GMA requires that any amendments to the Comprehensive Plan and/or development regulations conform to the requirements of the Act, and that all proposed amendments, with certain limited exceptions, shall be considered concurrently so that the cumulative effect of the various changes can be ascertained. Proposed amendments to the Comprehensive Plan and/or development regulations must also be consistent with the following State, regional and local planning mandates and guidelines:

- The State Growth Management Act (GMA);
- The State Environment Policy Act (SEPA);
- The State Shoreline Management Act (SMA);
- The Puget Sound Regional Council's *VISION 2050* Multicounty Planning Policies;
- The Countywide Planning Policies for Pierce County;
- TMC 13.02 concerning the procedures and criteria for amending the Comprehensive Plan and development regulations.

2. Landmarks Preservation Commission Review

Pursuant to the Tacoma Municipal Code, Section 13.07.060 – Tacoma Register of Historic Places – Nomination and designation process for Historic Special Review and Conservation Districts, nominations for new local historic special review districts are submitted to the Planning and Development Services Department and forwarded to the Landmarks Preservation Commission for its review. The Commission subsequently determines whether to accept the nomination and adopt a schedule for its review.

For the College Park Historic Special Review District application, the nomination was received by the City on May 3, 2021 and scheduled for its first review by the Landmarks Commission on June 23, 2021. The Commission subsequently formally accepted the nomination for review and adopted its schedule on July 21, 2021, which included meetings to discuss elements of the nomination, including historic designation criteria, boundaries, potential design guidelines, and public information sessions, as follows:

Date	Activity
6/23/21	Introduction of nomination request; discussion of review schedule
7/21/21	Adoption of review schedule; approve public notice of nomination
8/11/21	Review district significance, first public information session
8/25/21	Review proposed boundaries, buildings inventory, design guidelines
9/8/21	Second public information session
10/13/21	Recap of previous discussions; discussion of opinion survey; revise review schedule
10/20/21	Release opinion survey
11/3/21	Survey response deadline
11/10/21	Discuss results of survey; discussion of preliminary recommendations
12/8/21	Discussion of preliminary recommendations
1/12/22	Adopt preliminary recommendations; set hearing date
2/9/22	Public Hearing
2/23/22	Review of hearing testimony; discussion of issues and observations
3/9/22	Discuss findings and recommendations
4/13/22	Adopt Findings and Recommendations

On April 13, 2022, the Landmarks Preservation Commission adopted its Findings and Recommendations, concluding that the proposed district meets the designation criteria for creation of a new historic special review district. Within their recommendations, the Commission recommended:

- Establishing the College Park Historic Special Review District
- Relaxing or reducing regulatory standards for review in any design guidelines that are adopted for the district, particularly pertaining to secondary elevations
- Reviewing the standards and procedures in the municipal code pertaining to historic district creation
- Committing additional resources towards historic district creation in underserved areas of the City.

3. Planning Commission Review

Historic district creation requires review and approval by the Planning Commission, prior to sending its recommendation to City Council. Unlike other zoning amendments, the Planning Commission’s approval is required to establish an historic overlay zone. If the Planning Commission votes to reject the recommendation, residents may appeal the decision to City Council (TMC 13.07.060).

The following outlines the Planning Commission review process:

- “Each proposal for a new Historic Special Review District or Conservation District and the respective Landmarks Preservation Commission recommendation shall then be considered by the Planning Commission of the City pursuant to the procedures for area-wide zoning in TMC 13.05.030.B.” (TMC 13.07.060.C.1);
- “In making a recommendation to the City Council, the Planning Commission shall consider the conformance or lack of conformance of the proposed designation with the Comprehensive Plan of the City. The Planning Commission may recommend approval of, or approval of with modifications, or deny outright the proposal, and shall promptly notify the Landmarks Preservation Commission of the action taken.” (TMC 13.07.060.C.3);
- “[The Planning Commission shall] review and make recommendations on matters concerning land use and development, including area-wide zoning reclassifications, moratoria, and interim zoning.” (TMC 13.02.040.E);
- “[The Planning Commission shall] work with the Landmarks Preservation Commission, pursuant to TMC 13.07, to designate historic special review districts and conservation districts within the City and to make recommendations to the City Council for establishment of such districts.” (TMC 13.02.040.J);
- “The Planning Commission shall conduct a public hearing to consider an area-wide zoning reclassification and to determine the consistency of the reclassification with the Comprehensive Plan and its elements and RCW 36.70A.” (TMC 13.05.030.B.9.e); and
- “Upon completion of the public comment period and review of the public testimony, the Planning Commission will prepare a recommendation and supportive findings to forward to the City Council for consideration.” (TMC 13.05.030.B.10)

To date, the Planning Commission has had 5 meetings regarding College Park, including a Public Hearing on June 1, 2022 and a communication item transmitted on August 3, as follows:

Date	Activity
9/1/21	Planning Commission briefing
5/4/22	Planning Commission review Landmarks Commission recommendation; set hearing date
6/1/22	Planning Commission Public Hearing
8/3/22	Post hearing testimony recap (communication item)
9/7/22	Review and Discussion
10/22 – 11/22 (TBD)	Adopt findings and recommendations to City Council

The Planning Commission has made several requests for information and clarification during the course of this review, as follows (dates provided for meeting packets reference).

Date	Subject (s)
10/6/21	General questions about historic districts and preservation

	How historic criteria are applied Equity, inclusion and community economic impacts Neighborhood goals Design guidelines and design review Buildings inventory Boundaries Outreach
8/3/22	Review of testimony Demographics of the neighborhood (and comparable neighborhoods) National register nomination process Compatibility with renewable energy and EV infrastructure Typical project types Compatibility with urban design program Demolition review Build dates Available sites for development in district Permit review timeline Tax incentives
9/7/22	Office of Equity and Human Rights review Examples of development scenarios in historic districts

4. Public Review Process

There has been extensive public outreach regarding the College Park Proposal, which has involved significant advocacy by the nominators, postcard surveys, email distribution lists, a dedicated website and public information sessions, in addition to a public hearing. Generally speaking, there has been a consistent level of significant public support from residents and property owners directly affected by the proposal, based upon public comments, feedback and surveys.

Outreach by Supporters

Outreach leading up to the nomination was included in-person visits to every property in the proposed local historic district. Postcards were mailed to every house, and there has been a Facebook page and website posted for over five years. There have also been three articles written in The News Tribune and Tacoma Weekly. The original submittal contained a petition and a postcard survey, completed by the nominator. The total of public response in the submittal was 283 individuals in support, 28 opposed. Outreach efforts by supporters continues.

Outreach by the City

Upon receipt of the nomination, the Landmarks Commission established a dedicated website (www.cityoftacoma.org/collegeparkHD) and mailed a postcard to all occupants and taxpayers

of record within a 400' radius of the district boundaries, announcing two Public Information Sessions and directing interested parties to the website. The Commission also established a College Park Historic District email distribution list that includes 143 recipients. Between June and December 2021, the Commission received over 60 written comments on the College Park proposal.

The Landmarks Commission held 14 meetings to discuss College Park. In addition to its normal meeting schedule, the Commission held 2 public information sessions dedicated to College Park, on August 11 and September 8, 2021.

On October 10, 2021, the Commission released an opinion survey online and in post card format. The survey was sent to the email distribution list, posted online, and mailed to over 1300 addresses, representing taxpayers of record and occupants of addresses within a 400' radius of the proposed district. By the November 3 deadline, 340 responses had been received.

Public Hearing – Phase 1

On February 9, 2022, the Landmarks Commission held a public hearing and received 60 comments. Notice was mailed to taxpayers of record and occupants within 400' of the proposed district boundaries, sent via email distribution list, posted online and in social media, and published in The News Tribune on February 2, 2022.

Following the hearing, the Landmarks Commission voted 5-1 to adopt its Findings and Recommendations and forward these to the Planning Commission.

Public Hearing – Phase 2

On June 1, 2022, the Planning Commission held a Public Hearing on receive public comment on the Landmarks Commission recommendation. Staff also conducted a virtual Public Information Q&A session on May 26, 2022 ahead of the hearing.

Per the Planning Commission's requirements, the following notices were sent:

1. **Public Notices** – The notice for the public hearing and the informational meeting was mailed during the week of May 9, 2022, to approximately 7,000 individuals and entities within 2,500 feet of the proposed district boundaries. The notice was also e-mailed to more than 100 individuals on the Landmarks Preservation Commission's College Park distribution list and to more than 900 individuals on the Planning Commission's distribution list.
2. **News/Social Media** – The City of Tacoma issued a News Release on May 24, 2022. An online advertisement was placed on The News Tribune on May 20, 2022. A legal notice concerning the DNS, the public hearing and the informational meeting was placed on the Tacoma Daily Index on May 20, 2022. An event page for each of the public hearing and the informational meeting was posted on the City's Facebook, starting the week of May 24.

3. **Public Signs** – Three signs were installed (per TMC 13.05.070.J.4) on May 23, 2022 at the following locations within the subject area: N. Union Ave. at N. 18th St., N. 21st St. at N. Lawrence St., and N. Alder St. at N. 8th St.
4. **60-Day Notice** – A notice was sent to the Joint Base Lewis-McChord (per RCW 36.70A.530(4)) on May 18, 2022, asking for comments within 60 days of receipt of the notice.
5. **Tribal Consultation** – A letter was sent to the chairman of the Puyallup Tribe of Indians on May 18, 2022 to formally invite the Tribe’s consultation.
6. **Takings Review** – A request was sent to the City Attorney’s Office, seeking legal opinions on whether the proposed College Park Historic District might result in an unconstitutional taking of private property (pursuant to RCW 36.70A.370). Upon review conducted in accordance with the standards recommended by the Washington State Attorney General, the City Attorney’s Office concluded, on May 19, 2022, that the proposal would not constitute a taking.

The Planning Commission was provided with the full Comment Record and staff responses on in the meeting packet from the August 3 Planning Commission meeting.

There were a total of 107 comments received during the hearing and comment period, including 17 oral comments and 90 written comments. As previously noted, approximately 69% of comments received were in support of the district, whereas approximately 31% of the comments were in opposition.

This is consistent with the Public Hearing conducted by the Landmarks Commission on February 9, 2022, in which approximately 67% of the comments favored the creation of the historic district.

Among supportive comments, the most common broad themes included:

- The proposed district is historically significant
- It is important to protect the look/feel/charm of the neighborhood
- The creation of historic districts is supported by the Comprehensive Plan
- It is possible to create historic districts and achieve density/housing goals, and that the proposal is compatible with Home In Tacoma.

Among opposing comments, the most common themes included:

- It will have negative effects on future development, including housing supply and cost
- It is inconsistent with policy goals of equity and inclusion
- It will have negative impacts on property rights and result in increased costs to homeowners

5. Commission Feedback and Policy Review

During its discussions of the College Park Historic District, the Planning Commission members have raised issues related to other policy areas in the Comprehensive Plan and City Council Policies. The primary issues are grouped into the following categories:

1. Whether the historic district is compatible with housing goals for the City, including Home In Tacoma, and its effect on efforts to increase housing supply and to reduce barriers to housing, including cost.
2. Whether the historic district is consistent with policy objectives regarding sustainability, including sustainable development and green infrastructure (such as EV charging stations and solar panels).
3. Whether the proposal is consistent with City policies regarding diversity, equity and inclusion; specifically, whether the proposal supports the City’s efforts to achieve equitable outcomes citywide, and whether the proposal continues or memorializes racist legacies such as redlining.
4. Whether the district creates a burden for members of the community in terms of costs of design review and district requirements.
5. Members of the Commission have also noted that the area does appear to have historic and architectural character, and the visual qualities of an early 20th century residential neighborhood. Central to the discussion is whether the proposal, as a historic conservation tool, is consistent with the Design and Development, Urban Form and Historic Preservation policies of the Comprehensive Plan.

In the following pages, an analysis of some of the relevant Comprehensive Plan goals and policies is provided as a means for assessing the College Park proposal. This summary is intended to provide a basis for assessing the balance of this proposal and the planning policy framework. Commissioners may identify other policies as relevant that are not listed here.

Feedback regarding the College Park Historic District proposal, and how it specifically does or does not meet existing policies in the Comprehensive Plan, will assist staff with drafting the recommendations report.

Compatibility with Housing Goals

Is the proposed historic district compatible with housing goals for the City, including Home In Tacoma, and its effect on efforts to increase housing supply and to reduce barriers to housing, including cost?

Policy	Observations
Policy H–1.1 Maintain sufficient residential development capacity to accommodate Tacoma’s housing targets and accommodate changing	The City of Tacoma has demonstrated sufficient capacity to accommodate regional growth targets. Home in Tacoma Phase 2 will establish zoning changes to low and mid-scale residential areas to accommodate changing housing needs and preferences. The impact of this proposal is difficult to quantify, but it is possible that the design review

<p>housing needs and preferences of Tacoma residents.</p>	<p>requirements and historic district would prevent some projects from occurring that would otherwise.</p>
<p>Policy H–1.4 Strongly support the maintenance and improvement of the existing housing stock and encourage the adaptation of the existing housing stock to accommodate the changing variety of household types.</p>	<p>Following the implementation of Home In Tacoma code amendments, there likely will be additional opportunities for creation of more housing units within existing structures, which could create units at a much lower cost than new construction would otherwise. This is true whether the historic district is in place or not; however the district would also have the effect of encouraging or requiring the existing buildings be reused rather than torn down, which is a key component of historic preservation generally.</p>
<p>Goal H–2 Ensure equitable access to housing, making a special effort to remove disparities in housing access for black, indigenous and people of color, low-income households, diverse household types, older adults, and households that include people with disabilities.</p> <p>Policy H–2.4 Evaluate plans and investments and other legislative land use decisions to identify potential disparate impacts on housing choice and access for protected classes.</p>	<p>Home in Tacoma Phase 2 will be implementing zoning and development regulation updates that will seek to remove barriers and promote more equitable access to housing. Phase 2 of Home in Tacoma is occurring concurrently with the College Park Historic District review, so it is difficult to say with certainty how the two proposals may ultimately interact. Historic Districts are an overlay zone that affect the design and development of new housing. The types of housing allowed are generally determined by the underlying base zone. However, the cited policy directs the city to work affirmatively to remove disparities in housing access and it is possible that the cumulative effect of multiple historic districts within lower density, and higher opportunity neighborhoods, could reinforce existing disparities.</p> <p>Potential disparate impacts could include a future limiting effect on number of new housing units in this area, higher unit cost, and potentially a reduction in rental unit availability, if there is a relationship between historic districts and increased future home ownership percentages. The most significant barrier, historic status notwithstanding, is likely housing prices.</p>
<p>Policy H–5.11 Promote public acceptance of new housing types in historically lower density areas by ensuring that they are well designed and compatible with the character of the neighborhoods in which they are located through a robust design review process.</p>	<p>The College Park Historic District proposal is intended to address this policy directly through the establishment of a reasonable and predictable design review process, much like that which is in place in other historic districts.</p>

<p>Policy H-4.4 Facilitate the expansion of a variety of types and sizes of affordable housing units, and do so in locations that provide low-income households with greater access to convenient transit and transportation, education and training opportunities, Downtown Tacoma, manufacturing/ industrial centers, and other employment areas.</p>	<p>As noted in the August 3, 2022 Commission packet, there are approximately 9 vacant lots in the district, as well as 68 “non-contributing” structures in the district that may be suitable for redevelopment should the district be established. In addition, there is the possibility of adding detached accessory dwelling units for many properties. Following the implementation of Home In Tacoma code amendments, there likely will be additional opportunities for creation of more housing units within existing structures, which could create units at a much lower cost than new construction would otherwise. This is true whether the historic district is in place or not; however the district would also have the effect of encouraging or requiring the existing buildings be reused rather than torn down.</p> <p>In the absence of the final zoning changes from Home in Tacoma Phase 2 it is difficult to ascertain exactly what the impacts could be on the range of housing choices that are allowed and/or feasible in the district; however while an historic district does allow expansion of housing units and unit types, it is possible that the range of housing types may be limited by the district.</p>
<p>Policy H-4.10 Encourage development and preservation of small resource- efficient and affordable single-family homes throughout the City.</p>	<p>Generally speaking, the existing stock of older houses in Tacoma tend to be smaller, and in some cases, more affordable than newer and larger homes. The College Park Neighborhood is comprised primarily of pre-War detached dwellings that are smaller in scale. However, it is also located in one of the higher cost areas of the City, and this is reflected in real estate prices.</p>

Compatibility with Sustainability Policies.

Is the historic district proposal consistent with policy objectives regarding sustainability, including sustainable development and green infrastructure (such as EV charging stations and solar panels).

Policy	Observations
<p>Policy DD-7.1 Encourage rehabilitation and adaptive reuse of buildings, especially those of historic or cultural significance, to conserve natural resources, reduce waste, and demonstrate stewardship of the built environment.</p>	<p>Adaptive reuse is one of the core tenets of historic preservation. Construction is one of the highest sources of waste stream debris, as well as the environmental costs related to new materials and transport. An historic district strongly encourages reuse of existing buildings, and the term “adaptive” anticipates that new uses, including conversions to higher occupancy, will occur.</p>

Policy DD-7.7 Encourage and promote energy efficiency through the Building Code and the use of solar and other renewable resources in individual buildings and at a district scale.

Creation of the College Park Historic District could increase the complexity of installation of green infrastructure such as solar panels. In the North Slope Historic District, several solar installations have been approved, and the design guidelines encourage consideration of both sensitive location of solar equipment as well as consideration of technical requirements. Thus, creation of the district does not preclude or prevent solar panel installation, but it may introduce uncertainty.

Thermal retrofitting of windows is a more challenging topic. Generally historic districts will require or highly encourage preservation of historic windows, which are considered character defining features of an historic house. When replacement is warranted, often the replacement windows are required to be of an historic appearance in materials, visual qualities and configuration. Generally, this represents additional costs. There are tax incentive programs for historically sensitive remodels that may offset some costs, and the Landmarks recommendation includes a recommendation to consider relaxing window requirements for secondary and rear elevations. However, window retrofits can be a challenge within local historic districts.

Compatibility with Development Objectives/Cost/Burden

Does the proposal create a burden for members of the community in terms of costs of design review and district requirements?

Policy	Observations
<p>Policy H-4.3 Evaluate plans and investments for their impact on household cost; and consider ways to reduce the combined cost of housing, utilities, and/or transportation</p>	<p>In the current climate it is difficult to assess the effect of historic district creation on household costs. Generally, studies have shown that residential historic districts do not experience a decline in property value as a result of district creation. Conversely, the effect on property values may be neutral or an increase in comparison to a similar neighborhood without historic designation.</p> <p>Mitigating factors relevant to this proposal include the fact that many older neighborhoods, including College Park, are centrally located and well connected to utilities and transportation (as opposed to suburban development).</p> <p>Increased cost burdens related to design review fees and requirements have been provided previously in response to</p>

Commission questions. As noted there is a \$500 maximum design review fee for residential projects that is levied in addition to other development permits (which may include site development, building, land use or other related permits). For full reviews by the Landmarks Commission, there is also a time component that can range from 2-3 weeks for a single meeting review to several months, depending on project complexity. However, to increase efficiency and reduce cost burdens, a significant number of minor projects are reviewed at the staff level under the Landmarks Commissions administrative review policies.

Compatibility with Equity Policies

Is the proposal consistent with City policies regarding diversity, equity and inclusion; specifically, does the proposal support the City’s efforts to achieve equitable outcomes citywide, and does the proposal continue or memorialize racist legacies such as redlining?

Policy	Observations
<p>Goal H–2 Ensure equitable access to housing, making a special effort to remove disparities in housing access for black, indigenous and people of color, low-income households, diverse household types, older adults, and households that include people with disabilities.</p>	<p>The proposed College Park Historic District does not specifically address these goals and policies. Under these policies, the question is whether the proposal might reinforce or continue existing disparities. Historically, the area was considered desirable in “redlining” maps, and according to census data is less racially diverse than other areas of the city. It is also a high opportunity area with relatively high property values. It has been noted several times in commissioner and public comments that the legacy of discrimination and exclusion is reflected in the current demographics of the City, and that this association is problematic for the historic district proposal.</p>
<p>Policy H–2.1 Foster inclusive communities, overcome disparities in access to community assets, and enhance housing choice for people in protected classes throughout the city by coordinating plans and investments with fair housing policies.</p>	<p>Prior guidance by the Planning Commission included amending the redlining narrative in the nomination document, as well as consultation with the Office of Equity and Human Rights. In its statement to the Planning Commission, the Office of Equity and Human Rights noted that while the Landmarks Commission recommendation notes historic disparities between different areas of the city, it did not make specific recommendations for addressing them. The report also states that the College Park proposal “will increase the disparities between communities rather than redress and further widens the gap of equity in our service to historically marginalized communities.”</p>
<p>Policy H–2.4 Evaluate plans and investments and other legislative land use decisions to identify potential disparate impacts on housing choice and access for protected classes.</p>	

Council Resolution 40622, which among its directives, instructs the City to evaluate cumulative impacts of programs and policies on efforts to improve equitable outcomes, including prioritizing “anti-racism in the evaluation of new policies and programs, as well as the sustained and comprehensive transformation of existing services, with the initial priority being given to policing”

The Landmarks Commission recommendations include committing additional resources for historic preservation work in underserved areas of the City but do not make specific proposals, and the recommendations do not pertain specifically to housing issues.

The district, if established, will not exempt the neighborhood from zoning changes under the Home In Tacoma initiative.

Home in Tacoma Phase 2 will be implementing zoning and development regulation updates that will seek to remove barriers and promote more equitable access to housing. Phase 2 of Home in Tacoma is occurring concurrently with the College Park Historic District review, so it is difficult to say with certainty how the two proposals may ultimately interact. Historic Districts are an overlay zone that affect the design and development of new housing. The types of housing allowed are generally determined by the underlying base zone. However, the cited policy directs the city to work affirmatively to remove disparities in housing access and it is possible that the cumulative effect of multiple historic districts within lower density, and higher opportunity neighborhoods, could reinforce existing disparities.

Is the proposal, as a historic conservation tool, consistent with the Design and Development, Urban Form and Historic Preservation policies of the Comprehensive Plan?

Policy	Observations
<p>GOAL UF–1 Guide development, growth, and infrastructure investment to support positive outcomes for all Tacomans.</p>	<p>The College Park proposal is specific to the College Park Neighborhood, but has significant support among residents and property owners in that area.</p>
<p>Policy UF–1.4 Direct the majority of growth and change to centers, corridors, and transit station areas, allowing the continuation of the general scale and characteristics of Tacoma’s residential area while accommodating quality, context-sensitive urban infill through design standards, project review procedures, and zoning requirements.</p>	<p>The neighborhood is situated adjacent to the University of Puget Sound campus, and is near the Proctor Business District and connected by several transit lines.</p> <p>Preservation of the “general scale and characteristics” of the residential area is consistent with the historic district proposal, and would include design standards and review procedures to ensure compatibility of infill development.</p> <p>The College Park Neighborhood is a good example of the pre-War compact development pattern as noted in One Tacoma. One intent of historic districts is to create and enhance</p>

Policy UF–1.5 Strive for a built environment designed to provide a safe, healthful, and attractive environment for people of all ages and abilities.

Policy UF–1.9 Encourage high quality design and development that demonstrates Tacoma’s leadership in the design of the built environment, commitment to a more equitable city, and ability to experiment and generate innovative design solutions

GOAL UF–13 Promote the unique physical, social and cultural character Historic Residential Pattern Areas as integral to Tacoma’s sense of place.

Policy UF–13.2 Promote infill development within the residential pattern areas that respects the context of the area and contributes to the overall quality of design.

Policy UF–13.27 Preserve and expand historic street lighting along both arterial and neighborhood streets in historic districts.

GOAL DD–1 Design new development to respond to and enhance the distinctive physical, historic, aesthetic and cultural qualities of its location, while accommodating growth and change

Policy DD–1.1 Encourage excellence in architecture, site design, and infrastructure and durability in building materials to enrich the appearance of a development’s surroundings.

“sense of place.” Retention of the aesthetic qualities of early 20th century residential architecture and the associated neighborhood development pattern, with walkable streets and blocks, is a significant component of the College Park Historic District proposal.

The design review process, which is the most significant regulatory outcome from historic district creation, is intended to ensure high quality context sensitive design, and will be similar to what is in place in four other locally listed districts in Tacoma. Design guidelines also include standards for sidewalks, driveways and alley approaches and streetlights to ensure thoughtful installation of these types of elements in historic areas. Lastly, design review can provide some flexibility that fosters creativity that is not always encouraged by prescriptive standards.

Currently there are no other design related proposals at this scale of development proposed in Tacoma.

Policy DD–1.2 Promote site and building design that provides for a sense of continuity and order while allowing for creative expression.

Policy DD–1.5 Encourage building and street designs that respect the unique built natural, historic, and cultural characteristics of Tacoma’s centers, corridors, historic residential pattern areas and open space corridors, described in the Urban Form chapter.

Design Development Policies

Policy	Observations
<p>Policy DD–1.4 Consider development of a design review program to promote high quality design that supports community identity, a distinctive built environment, human-scale elements and amenities, resilient and durable materials, landscape enhancements, and other similar features.</p>	<p>The existing historic design review process is intended to ensure high quality context sensitive design. Currently there are no other design related proposals at this scale of development proposed in Tacoma.</p>
<p>Policy DD–4.1 Ensure that new development is responsive and enhances the quality, character and function of Tacoma’s residential neighborhoods.</p>	
<p>Policy DD–4.3 Encourage residential infill development that complements the general scale, character, neighborhood patterns, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, open space patterns, and landscaping. Allow a</p>	

range of architectural styles and expression, and respect existing entitlements.

Policy DD–4.9 Promote multifamily residential building design that is compatible with the existing patterns of the area.

Policy DD–13.1 Encourage the protection and restoration of high-quality historic buildings and places that contribute to the distinctive character and history of Tacoma’s evolving urban environment.

DD–13.2 Encourage development that fills in vacant and underutilized gaps within the established urban fabric, while preserving and complementing historic resources and neighborhood patterns.

Policy DD–13.12 Encourage infill that is architecturally compatible within surrounding contexts through appropriate scale and design controls both within Historic Districts and citywide.

Policy DD–4.2 Encourage more housing choices to accommodate a wider diversity of family sizes, incomes, and ages. Allow adaptive reuse of existing buildings and the creation of diverse infill housing types such as accessory dwelling units to serve the changing needs of a household over time.

As noted in the August 3, 2022 Commission packet, there are approximately 9 vacant lots in the district, as well as 68 “non-contributing” structures in the district that may be suitable for redevelopment should the district be established. In addition, there is the possibility of adding detached accessory dwelling units for many properties. Following the implementation of Home In Tacoma code amendments, there likely will be additional opportunities for creation of more housing units within existing structures, which could create units at a much lower cost than new construction would otherwise. This is true whether the historic district is in place or not; however the district would also have the effect of encouraging or requiring the existing buildings be reused rather than torn down.

Goal DD–13 Protect and preserve Tacoma’s historic and cultural character.	The Landmarks Preservation Commission and the National Park Service/Washington State Department of Archaeology and Historic Preservation have determined that College Park meets the historic designation criteria and is historically significant.
Policy DD–13.6 Expand historic preservation inventories, regulations, and programs to encourage historic preservation in areas that are under-represented by current historic preservation efforts.	This proposal does not directly address this policy; however, this is a component of the Landmarks Commission recommendations and there is ongoing work by the Historic Preservation Office in other areas of the City, including Lincoln District, McKinley, and South Tacoma.

Topic – Historic preservation

Policy	Observations
HP-2 Integrate Tacoma’s historic resources into community planning efforts.	This is an ongoing process that will likely be enhanced through the Neighborhood Planning Program. As it currently exists, initiatives such as College Park have not been well integrated into community planning efforts, in part due to resource issues.
HP-26 Use zoning tools to promote historic preservation goals and support an overall heritage conservation system.	The “heritage conservation system” referred to in the Historic Preservation Element (2011) describes a continuum of design review, which has prescriptive development standards housed in the zoning code at one end, and historic districts, with discretionary design review at the other end. The objective is to have context sensitive development standards as a baseline, but also for areas of significant historic character, to utilize historic districts as a land use tool.

C. Conclusions

Tacoma Municipal Code 13.07.060 directs the Planning Commission to “consider the conformance or lack of conformance of the proposed designation with the Comprehensive Plan of the City. The Planning Commission may recommend approval of, or approval of with modifications, or deny outright the proposal, and shall promptly notify the Landmarks Preservation Commission of the action taken.”

Key questions include:

1. Has the proposal been reviewed consistent with the required public process and notification? Does it have adequate public support?
2. Is the proposal consistent with applicable City codes and regulations?
3. Is the proposal consistent with City policies, particularly those within the Comprehensive Plan? If not, are there specific policy areas that are in conflict, and are there ways to amend the proposal to resolve those conflicts?

4. The Landmarks Commission recommendation includes recommendations to review historic district policies and process, and calls for identification of resources for work in underserved areas of the city. Does the Planning Commission concur with these recommendations?



City of Tacoma
Sustainable Tacoma Commission

September 17, 2022

TO: Infrastructure, Planning, and Sustainability Committee

RE: BRT Stream System Expansion Study

Dear IPS Committee Chair Walker and Committee members,

The Sustainable Tacoma Commission (STC) is a community advisory group whose purpose is to advise City Council and staff on sustainability initiatives, bringing community accountability to implementation of the City's vision for sustainability¹, 2022 Environmental Action Plan², and other sustainability policies. On August 18th, Pierce Transit's Bus Rapid Transit team presented to the STC regarding BRT and the Stream System Expansion Study (SSES). We are writing today to express our support of expanded BRT service in Pierce County.

Transportation, as a category, is the largest contributor to greenhouse gas emissions in the Puget Sound Region³. The high frequency and streamlined experience of Bus Rapid Transit (BRT) makes transit use appealing and convenient, contributing to mode shift away from personal vehicles. STC is appreciative of Pierce Transit's commitment to purchasing all electric BRT coaches and planning for the future with flexibility in mind to prioritize the newest in sustainable bus technology. The BRT Stream system has the potential to have a significant positive impact on air quality and congestion mitigation in Tacoma and Pierce County.

More BRT routes in Tacoma will provide tremendous benefit to our transportation network, particularly for non-drivers. It is known that low income and communities of color are more likely to depend on public transit and active transportation for their mobility⁴ while also facing disproportionate impacts from traffic violence⁵ due in part to insufficient infrastructure in their neighborhoods. BRT brings infrastructure improvements which prioritize safe mobility for pedestrians and bicyclists, and creates opportunities for the installation of street trees, small

¹https://www.cityoftacoma.org/government/city_departments/environmentalservices/office_of_environmental_policy_and_sustainability

²<https://cityoftacoma.org/cms/One.aspx?portalId=169&pageId=193914>

³<https://pscleanair.gov/632/Climate-Change-and-Transportation#:~:text=Transportation%20is%20the%20largest%20source,below%201990%20levels%20by%202050.>

⁴<https://www.pewresearch.org/fact-tank/2016/04/07/who-relies-on-public-transit-in-the-u-s/>

⁵<https://www.ghsa.org/sites/default/files/2021-06/An%20Analysis%20of%20Traffic%20Fatalities%20by%20Race%20and%20Ethnicity.pdf>

green spaces, upgrades to roadway stormwater systems, and other sustainable enhancements. More BRT in Tacoma has the potential to significantly reduce inequalities in access.

STC is prepared to advocate to Tacoma City Council and City of Tacoma staff on the importance of meaningful collaboration with Pierce Transit on BRT routes in Tacoma, as a means of meeting Climate Action Plan goals and increasing overall equity in access to opportunities in Tacoma.

Thank you.

Sincerely,

Evlondo Cooper III

Evlondo Cooper III, Co-Chair

A handwritten signature in black ink, appearing to be 'Lexi Brewer', with a stylized, cursive script.

Lexi Brewer, Co-Chair

CC: City of Tacoma Office of Environmental Policy and Sustainability
City Manager Elizabeth Pauli
Interim Deputy City Manager Kurtis Kingsolver
Environmental Services Director Michael Slevin
Planning Commission liaison Lihuang Wung
Transportation Commission liaison Carrie Wilhelme
Pierce Transit Board



City of Tacoma
Sustainable Tacoma Commission

September 17, 2022

TO: Infrastructure, Planning, and Sustainability Committee

RE: Proposed STGPD Moratorium

Dear IPS Committee Chair Walker and Committee members,

The purpose of the Sustainable Tacoma Commission is to advise City Council and staff on sustainability initiatives, bringing community accountability to implementation of the City's vision for sustainability¹, 2022 Climate Action Plan², and other sustainability policies. We are writing today to express our support for the proposed South Tacoma Groundwater Protection District moratorium as proposed by the Planning Commission, as well as some additional recommendations and considerations.

The South Tacoma Groundwater Protection District, which sits above the South Tacoma aquifer, makes up a substantial portion of South Central Tacoma. In designating this District, the City and County have recognized that certain urban land uses jeopardize the quality of this groundwater, including excessive stormwater runoff, above ground storage tanks, and large quantities of hazardous substances. This area of Tacoma is a hotspot on the City's equity map, indexing it as "very low" opportunity. Frontline areas of Tacoma, like this area of South Tacoma, are deserving of particular attention to environmental hazards and challenges, both through historical practices such as redlining, and current policy and development decisions.

The STC is appreciative of the work the Planning Commission and the Planning Department did in a very short time on investigating the severe concerns expressed by many community members regarding the ongoing safety of the South Tacoma aquifer. The Planning Commission has proposed a one year moratorium pending updates to the STGPD allowable uses on the following land use types:

- New metal recycling/auto wrecking businesses
- New underground storage of hazardous waste
- New auto oriented uses
 - Gas stations
 - Vehicle service and repair

¹https://www.cityoftacoma.org/government/city_departments/environmentalservices/office_of_environmental_policy_and_sustainability

²<https://cityoftacoma.org/cms/One.aspx?portalId=169&pageId=193914>

We support the proposed moratorium, as it is clear that the cumulative effects of intensive uses in the STGPD aren't currently understood. Pending analysis of the best available science to inform updates to the STGPD code, it is imperative to halt potential new sources of pollution.

As Council takes up the issue of this moratorium and other issues related to the STGPD and the South Tacoma aquifer, we recommend that Council also consider the following:

1. The aquifer recharge area extends well beyond the STGPD and the City of Tacoma's jurisdiction down to Frederickson and the Roy Y. Yet with warehouse development and other development taking place above the recharge area, there is no clear indication of how much impervious surface the aquifer can withstand before its natural recharge system is compromised. We recommend that the City work with the County to understand these cumulative effects, and to have a regional strategy for protection of this aquifer.
2. Tacoma Water shared a graph showing that in 2015 they drew 16,000 acre feet of water because the Green River water levels were unusually low due to drought. They shared they could draw as much as 27,000 acre feet if needed, though would need more pumps to do so. The UW Climate Impacts Group No Time to Waste Report³ uses 2015 as a likely scenario in our climate future. What does it take to guarantee an annual recharge of at least 16,000 acre feet of water?
3. STC supports the Planning Commission's effort on a South Tacoma Economic Green Zone. Since the development of appropriate code will take some time, Council should consider designating physical space for green businesses to come to the area. This would be a major win for equity in terms of clean jobs for frontline workers, and a step closer to the City's CAP goals
4. New research is now showing that stormwater pollution from tires is extremely toxic to salmon⁴, and Leach creek is a salmon-bearing creek that receives stormwater runoff from this area of Tacoma⁵. With greatly increased freight traffic to the area from the proposed Bridge Point Warehouse project and the potential New Cold expansion, is the City using the best available science to mitigate tire pollution from road stormwater runoff, for example with special soil gutters⁶?
5. The health impacts of air pollution are well known. Increasing truck traffic will increase the particulate air pollution in an area that is already exposed to significant traffic-related air quality impacts. The City should consider sponsoring a network of air quality monitors to assess this area of Tacoma. Currently, there is only one listed monitor on the PSCAA website in this area.

We appreciate the time the council is taking to study the concerns of its residents and try to find new ways to address equity and anti-racism in the community. The health of each neighborhood's environment directly connects to the health of its residents. STC supports the city's efforts in looking at the city neighborhood by neighborhood.

³ <https://cig.uw.edu/projects/no-time-to-waste/>

⁴ https://www.fisheries.noaa.gov/feature-story/roadway-runoff-known-kill-coho-salmon-also-affects-steelhead-chinook-salmon?utm_medium=email&utm_source=govdelivery

⁵

https://www.ezview.wa.gov/Portals/_1962/images/WREC/WRIA12/201907/30/WRIA%2012%20SoTacomaHoldin gBasinLeach%20Creek%20Alt%206%20Supplemental%20Memo.pdf

⁶ <https://www.fisheries.noaa.gov/feature-story/simple-soil-mixture-reverses-toxic-stormwater-effects>

Thank you.

Sincerely,

Evlondo Cooper III

Evlondo Cooper III, Co-Chair

A handwritten signature in black ink, appearing to read 'Lexi Brewer', with a stylized, flowing script.

Lexi Brewer, Co-Chair

CC: City of Tacoma Office of Environmental Policy and Sustainability
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