



Public Comments

Meeting: Wednesday, May 3, 2023

Submittal: Written comments received at planning@cityoftacoma.org
by 12:00 noon on the meeting day

Subjects: Comments are addressing the following Discussion Item(s) on the agenda:

F1 – 2023 Amendment Package Debriefing – “Mor Furniture”

**No. of
Comments:** Two



DATE: May 01, 2023
TO: City of Tacoma Planning Commission
FROM: Scott Clark, Larson and Associates
SUBJECT: Mor Furniture Land Use Designation Amendment Application

Good afternoon, honorable Commissioners. Thank you for the opportunity to provide comment on the Mor Furniture Comprehensive Plan Land Use Amendment application. My name is Scott Clark and I'm with Larson and Associates representing the property owner, Wesco Management.

First, we would like to provide an update on the scope of the Mor Furniture application. That is, Mor Furniture has recently completed an extensive tenant improvement in an existing space at the Tacoma Mall, which they have decided to make their primary location. As such, Mor Furniture no longer plans to locate at the 48th Street site, including the southern parcel currently under review for land use designation amendment. Instead, we respectfully ask the Commission to continue its review and move this application forward on its merits in the normal and typical fashion, but without a specific use in mind. Thank you for your considerations.

Based on the comments observed thus far, it appears there is confusion about the proposed amendment being compared to retaining the site in its existing condition. To confirm, this parcel is a privately owned vacant parcel that has the potential to develop under the current zoning, or potentially develop under a commercial zone if the land use designation is approved. This site is sandwiched between Interstate-5 to the west, several Commercial properties to the north and school district properties to the east and south. Since this is privately owned property, the idea that retaining it as undeveloped property or as a buffer for the school district is not possible, nor was it an expectation of the school district when the property was sold. It's our understanding the question before the Planning Commission is whether or not a change in the land use designation is warranted and makes practical sense for the community given the individual circumstances of the site in balance with the goals and policies of the Comprehensive Plan.

Pursuant to the Commission's request for Applicant responses to comments and concerns, we would like to offer the following brief thoughts for your consideration:

Traffic:

The applicant has provided a preliminary traffic study for consideration, which provides potential traffic impact scenarios comparing "residential development" to "commercial development". Until a project specific application is made, specific traffic impacts cannot be determined

definitively. However, the current report finds it likely that a commercial development on this and the currently C2 zoned parcels to the north will have reduced traffic impacts in comparison to residential development. Given the site is adjacent to the I-5 corridor and immediately abutting commercially zoned properties to the north, if this site is developed residentially under the current zone, it could potentially be a multi-family development at the maximum density possible. As such, residential development under the existing condition will generate significant traffic impacts, which according to the traffic report will likely be greater than if developed with a commercial warehouse.

Air Quality:

Air quality concerns appear to primarily be related to vehicular emissions as a result of area traffic. As noted above, a traffic study has been provided that clearly points out the fact that residential development under the existing condition will generate significant, if not a greater number of trips, and therefore will have greater air quality impacts; i.e. *a greater number of trips = a greater volume of vehicular emissions*. Here again, until a project specific application is made, specific traffic volumes cannot be determined definitively. Once a project is submitted it will be reviewed through the State Environment Policy Act (SEPA) process as appropriate. Also note the maximum estimated Automobile Average Daily Trips (AADT) for either R2 or C2 uses are estimated to be less than 2000 daily trips. This is less than 1% of the current 200,000+ AADT of the I-5 corridor that adjoins this property, per WSDOT Traffic Count Database System.

Parks, Greenspace, Tree Canopy:

Concerns regarding the retention of the existing tree canopy have been a bit of a surprise. There currently are virtually no trees and no known buffer plantings; the site is primarily grasses, bushes and invasive species (*blackberry*). However, any development proposed in the future, whether it be residential or commercial, will be required to address and comply with the City's tree retention/replacement requirements, as well as any City vegetative buffering requirements. When a project specific application is made, specific tree and/or buffer requirements will be addressed and complied with as appropriate. Additionally, any park and/or greenspace requirements associated with a development proposal will also be complied with as required.

We are in agreement with Staff regarding the park and recreation mapping, which was applied in this case based solely on school district ownership. Now that the school district has sold the property and it has moved in to private ownership, regardless of the commercial land use designation request, a revision removing the site from the park and recreation mapping is appropriate and needed.

Site Access & Safety:

The applicant has provided a preliminary traffic study for consideration, which proposes the use of South 48th Street as the primary commercial access for the site; with "emergency vehicles only" access to South 49th Street. Limiting access to South 49th Street for a commercial development eliminates day-to-day traffic along this street thereby promoting pedestrian safety for the Giandrone Middle School and that of the South 49th Street neighborhood. Although not yet evaluated, it's likely a residential development under the existing zoning would utilize South 49th Street for access. This could potentially increase traffic safety concerns along this corridor,

while also potentially providing the residents direct access to the school. However, until a project specific application is made, specific site access and safety considerations cannot be effectively evaluated or definitively determined.

Compatibility:

The site is adjacent to: A) the I-5 corridor on the west; B) concurrently owned* commercially zoned properties to the north; C) the school's stormwater detention basin and parking lot to the east; and, D) undeveloped school property to the south. The proposed change to commercial will be consistent with the existing commercial zoning to the north, which makes practical sense in this particular location and circumstances. The addition of the only parcel not owned by the school district and not zoned commercial in this area will actually be more compatible with the existing conditions and neighboring uses, which will be reviewed for code compliance during development application review.

** concurrently owned = no controversy or opposition from the adjacent property owners*

From: [Dr Elly Claus McGahan](#)
To: [Planning](#)
Subject: Mor Furniture application
Date: Tuesday, May 2, 2023 11:33:06 AM

Dear Planning Commission,

I'm writing in regards to the Mor Furniture application. I will not be able to attend Wednesday's meeting. I did listen in on last Wednesday's meeting and appreciate the thought you are all putting in to this application. I served on the Sustainable Tacoma Commission before moving over to the Tacoma Public Utilities Board. My main reason for participating in either is climate change and its consequences. Our choices to elevate climate justice to the top of the list so that it is always a priority in decision making is one that I work hard to promote, as it easily slips down to give way to economic arguments. This decision regarding Mor Furniture is a climate justice decision and an economic decisions.

Warehouses are not carbon neutral and certainly not carbon negative the way we are building them now. One could argue that we do not need more furniture warehouses in our area, but it's not about furniture. It is the embodied carbon, the carbon emissions from heating (thought with the State Building Code adoptions this hopefully will be significantly lower due to heat pumps) and the truck and car traffic that warehouses bring with them. It is the lost opportunity of using the space for carbon sequestration and covering up land with impervious surface instead.

Changing the zoning to allow for the warehouse that

- gains us nothing in terms of reducing emissions,
- reduces health outcomes in the neighborhood from more pollution,
- potentially increases water pollution from tire residue,
- does nothing to meet the city's goals to increase tree canopy in a neighborhood that has a low tree canopy
- does nothing to move the neighborhood to higher living density around transit or increased access by walking or riding to shopping needs

It is time for us to be very intentional about land use to meet the Tacoma Climate Action Plan, Home in Tacoma, and purposeful choices to improve neighborhoods disadvantaged by historical racism. Supporting this warehouse would not fall in line with intentional planning.

Please consider what the land as zoned could be used for. Is it possible to imagine an orchard, an urban farm together with a community solar project, and perhaps another neighborhood farmers market as a byproduct? Could the school district partner with an organization to make it a learning space in food production and/or renewable energy for Gaudrone students? There's the question of who pays and who takes charge, because none of these efforts are free. And yet rezoning to accommodate another warehouse and its needs is not the answer.

Thank you for you work,

Elly Claus-McGahan

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