



## AGENDA

**MEETING:** Regular Meeting (Hybrid)  
**DATE/TIME:** Wednesday, October 4, 2023, 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

### A. Call to Order

- Quorum Call
- Land Acknowledgement

### B. Approval of Agenda

### C. Approval of Minutes

- September 20, 2023

### D. Public Comments

This is the time set aside for public comment on Discussion Items on this agenda that have not been the subject of a recent public hearing.

- Written comments must be submitted to [Planning@cityoftacoma.org](mailto:Planning@cityoftacoma.org) by 12:00 noon prior to the meeting. Comments will be compiled, sent to the Commission, and posted on the Commission's webpage at [www.cityoftacoma.org/PlanningCommissionAgendas](http://www.cityoftacoma.org/PlanningCommissionAgendas).
- To comment virtually, join the meeting using Zoom. To comment in person, sign in at the back of the Council Chambers. Where necessary, the Chair may limit the allotted time for comment.

### E. Disclosure of Contacts and Recusals

### F. Discussion Items

#### 1. Historic Special Review and Conservation Districts Moratorium - Debrief

- Description: Review oral and written comments received to identify key issues and solicit feedback from the Landmarks Preservation Commission.
- Action: Comment and Direction.
- Staff Contact: Reuben McKnight ([RMcKnigh@cityoftacoma.org](mailto:RMcKnigh@cityoftacoma.org))

#### 2. South Tacoma Groundwater Protection District (STGPD) Code Update

- Description: Review an initial comparison of critical aquifer recharge standards for Pierce County jurisdictions that have jurisdiction within the South Tacoma Aquifer with a focus on the following: Impervious Surface Standards, Landscaping Standards, and High Risk/High Impact Uses; and provide direction on the geographic scope of the amendments.



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¿Necesitas información en español? Cần thông tin bằng tiếng Việt? 한국어로 정보가 필요하십니까? ព្រះការព័ត៌មានជាភាសាខ្មែរ?

Нужна информация на русском? Потрібна інформація українською мовою? Contact TacomaFIRST 311 at (253) 591-5000.

- Action: Comment and Direction.
- Staff Contact: Stephen Atkinson ([SAtkinson@cityoftacoma.org](mailto:SAtkinson@cityoftacoma.org))

### 3. Home in Tacoma – Phase 2

- Description: Review and provide guidance on additional topics, including building design, additional landscaping code updates, and continued discussion of parking standards.
- Action: Comment and Direction.
- Staff Contact: Elliott Barnett ([EBarnett@cityoftacoma.org](mailto:EBarnett@cityoftacoma.org))

## G. Upcoming Meetings (Tentative Agendas)

- (1) Agenda for the October 18, 2023, meeting includes:
  - Home In Tacoma – Phase 2
  - Urban Design Review Program – Recommendation
  - Planning Commission’s Annual Report and Work Program
- (2) Agenda for the November 1, 2023, meeting includes:
  - Neighborhood Planning Program – Proctor Neighborhood Plan
  - Home In Tacoma – Phase 2
- (3) Agenda for the November 15, 2023, meeting includes:
  - Historic District Moratorium – Recommendation
- (4) Agenda for the December 6, 2023, meeting includes:
  - Neighborhood Planning Program – Proctor Neighborhood Plan
  - 2024 GMA Update
  - Home In Tacoma Phase 2 – Public Hearing

## H. Communication Items

- (1) **Status Reports by Commissioners** – Housing Equity Taskforce, Picture Pac Ave, Facility Advisory Committee, and the TOD Task Force.
- (2) **IPS Agenda** – The Infrastructure, Planning, and Sustainability Committee’s next hybrid meeting is scheduled for Wednesday, October 11, 2023, at 4:30 p.m.; the agenda (tentatively) includes a presentation on the City’s Committees, Boards, and Commissions. (Held in Conf Rm 248 at 747 Market Street, Tacoma, WA 98402, or virtually at <http://www.zoom.us/j/87829056704>, passcode 614650.)

## I. Adjournment



## **MINUTES (draft)**

**MEETING:** Regular Meeting and Public Hearing (hybrid)

**DATE/TIME:** Wednesday, September 20, 2023, 5:00 p.m.

**PRESENT:** Christopher Karnes (Chair), Anthony Steele (Vice-Chair), Morgan Dorner, Brett Marlo, Matthew Martenson, Jordan Rash, Sandesh Sadalge, Brett Santhuff

**ABSENT:** Robb Krehbiel

### **A. Call to Order**

Chair Karnes called the meeting to order at 5:00 p.m. A quorum was declared.

Chair Karnes read the Land Acknowledgement.

### **B. Approval of Agenda**

*Vice-Chair Steele moved to approve the agenda as submitted. Commissioner Sadalge seconded the motion. The motion passed unanimously.*

### **C. Approval of Minutes**

- September 6, 2023

Vice-Chair Steele noted an error on the September 6, 2023, meeting minutes, stating that the titles for the motioner and seconder should be swapped under section C.

*The minutes were approved as amended by unanimous consent.*

### **D. Public Comments**

Stephen Atkinson, Principal Planner, reported that no written comments were received.

No individuals addressed the Planning Commission.

Public Comment ended at 5:03 p.m.

### **E. Disclosure of Contacts and Recusals**

There were no disclosures of contacts or recusals.

### **F. Discussion Items**

#### **1. Urban Design Project Review (UDPR)**

Stephen Antupit, Senior Planner, provided an overview of the project elements, thresholds, and applicable areas; and a summary of public comment themes, noting program impacts, thresholds and departures, guidance and manual, tree canopy, board composition, code amendments, and effective dates.

Commissioners requested clarification and provided feedback throughout regarding the state law-mandated time limit for permit processing and who participated from the affordable housing community.

Vice-Chair Steele noted that his previous comment regarding the board composition was missing from the comment summary.

Carl Metz, Senior Planner, outlined the possible revisions on design departures and the Urban Design Board.

The Commission provided feedback throughout regarding the approval criteria; alternate methods or materials; creating flexibility; expanding eligible standards; potential departures from minimum setbacks, minimum parking, and maximum height; and representation on the Urban Design Board.

Discussion Item F1 was suspended until after the public hearing.

The Planning Commission recessed at 5:57 p.m. and reconvened at 6:00 p.m.

## **G. Public Hearing**

### **1. Historic District Moratorium**

Chair Karnes called the public hearing to order at 6:00 p.m. and outlined the procedures of the public hearing. Commissioners introduced themselves.

Reuben McKnight, Historic Preservation Officer, presented an overview of Council Resolution No. 41226, the purpose of the public hearing, key points regarding a potential moratorium, local historic districts, moratoria processes, and a review schedule.

Chair Karnes called for testimony. One person testified, as follows:

- (1) **Andrew Strobel** – I am testifying today to urge the Planning Commission to adopt a temporary moratorium on special review and historic districts. I believe the current code for historic districts is inadequate to address several needs of our City, including housing infrastructure and the very nature of the code which is centered on the preservation of historic resources throughout our City. I support a moratorium for the following reasons. The first reason is preemption. It is my understanding that the Planning Commission is also considering the warrants to eventually address changing the historic district code as part of the joint review with the Landmarks Commission. In advance of any code changes, the City and residents should enjoy preemption from any potential historic district applications that would be potentially considered as the Planning Commission was reviewing the code. Changes in the code could potentially change the legislative process for adoption of a historic district. It would be confusing to residents to follow any historic district adoption process while fundamentally changing the criteria for becoming a historic district through the code changes. Secondly, the City is undertaking huge steps to address our housing crisis through Home In Tacoma. The existing code, effectively, is vague enough that I believe that there are few places in the City that could be actually denied on their merits as a historic district. Concurrently Home In Tacoma is addressing our needs for additional density in different housing types. Until we address that process and understand development expectations for missing middle housing, I believe considering a historic district application as that process is being legislatively adopted would be counterintuitive to the goals of Home In Tacoma. Third, the existing policy does not take into account City of Tacoma's Resolution No. 40622, addressing policies that facilitate systemic racism. I believe there needs to be an additional look about how historic districts may or may not perpetuate historic red lining of our communities. A 2021 study of Washington DC historic districts found that the historic districts largely aligned along racial lines where 62% of the districts were populated by non-Hispanic whites and 15% by non-Hispanic black populations. While the rest of the City that were not historic districts were 31% non-Hispanic whites and 49% non-Hispanic blacks. I don't state these demographics to be conclusionary, but I think the City has to study this before employing further historic districts. In closing, I hope the Planning Commission considers adoption of this pause until the code can be properly addressed, and the commission can undertake some critical work in advance of addressing historic districts. The existing code allows an applicant to apply and apply again if rejected. Greatly disturbing the City and the Planning Commission's ability to get work done. Elements as simple as that warrant a pause and future code update.

Commissioners requested that staff return with information on the timeline for the 2024 Comprehensive Plan and Code Amendment package and how the creation of historic districts affects the implementation of Home In Tacoma and related legislation such as House Bill (HB) 1110.



Chair Karnes closed the public hearing at 6:15 p.m., reiterated that written comments are accepted until 5:00 p.m. on Friday, September 22, 2023, and thanked those who testified.

## **F. Discussion Items**

### **1. Urban Design Project Review (UDPR)**

Discussion Item F2 resumed at 6:16 p.m.

The Commission further discussed the composition of the Urban Design Board.

Metz outlined possible revisions regarding amenity space requirements and amenity space reductions.

The Commission provided feedback throughout regarding a potential cap for larger developments, the square foot per unit measurement, amenity space per room, the non-x District Multifamily standards, the importance of amenity space, a metric for the amenity space requirement minimum, accessibility of parks, allowing schoolyards to qualify for the exception, eliminating the exception/reduction provisions entirely, the floor area ration (FAR), a park proximity requirement, and safety concerns at parks.

Commissioner Santhuff left here at 6:54 p.m.

Antupit outlined the next steps and schedule.

### **2. Annual Report 2022-2023 and Work Program 2023-2025**

*Vice-Chair Steele moved to remove Discussion Item F2 – the Planning Commission’s Annual Report and Work Program – from tonight’s agenda. Commissioner Marlo seconded the motion. The motion passed unanimously.*

## **H. Upcoming Meetings (Tentative Agendas)**

(1) Agenda for the October 4, 2023, meeting includes:

- Historic District Moratorium – Debrief
- South Tacoma Groundwater Protection District (STGPD) Code Update
- Home In Tacoma – Phase 2

(2) Agenda for the October 18, 2023, meeting includes:

- 2024 GMA Update
- Urban Design Review Program – Recommendation

## **I. Communication Items**

The Commission acknowledged receipt of communication items on the agenda.

Chair Karnes reported that he will be presenting at the October 11, 2023, Infrastructure, Planning, and Sustainability Committee (IPS) meeting regarding the Planning Commission’s work and feedback to improve collaboration with IPS.

Vice-Chair Steele noted the Housing Equity Task Force will be resuming soon.

## **J. Adjournment**

The meeting was adjourned at 7:10 p.m.

*\*These minutes are not a direct transcription of the meeting, but rather a brief capture. For full-length audio recording of the meeting, please visit:*  
[http://www.cityoftacoma.org/government/committees\\_boards\\_commissions/planning\\_commission/agendas\\_and\\_minutes/](http://www.cityoftacoma.org/government/committees_boards_commissions/planning_commission/agendas_and_minutes/)





**To:** Planning Commission  
**From:** Reuben McKnight, Historic Preservation Officer  
**Subject:** **Debrief on Public Hearing: Consideration of a “Moratorium on Nomination and Designation of Historic Special Review and Conservation Districts”**  
**Memo Date:** September 25, 2023  
**Meeting Date:** October 4, 2023

**Action Requested:**

Debrief and review of public testimony; identify issues for Landmarks Commission review

**Background:**

On September 20, 2023, the Planning Commission conducted a public hearing to receive testimony regarding a proposed moratorium on the nomination and designation of local historic and conservation districts. The public comment period ended on September 22, 2023. At its next meeting, the Commission will review oral and written comments received to identify key issues, as well as to solicit feedback from the Landmarks Preservation Commission. The Planning Commission is scheduled to review input from the Landmarks Commission and adopt recommendations to City Council at its November 15 meeting.

**Discussion:**

In response to the public hearing notice, 30 comments were received during the comment period, including one oral comment during the hearing and 29 written comments received by the comment deadline.

Due to the short timeline between the comment period and the lead time for Commission materials for the October 4th meeting, staff is providing a summary of issues raised in this memo along with the raw comment record and will discuss the commentary more in-depth at the Commission meeting.

Of the comments received, a strong majority (26) stated opposition, three comments received are in support of the proposed moratorium, and one comment that did not directly address the moratorium.

Several comments both in support of and opposed to the proposed moratorium noted that there is a need for process and code improvements, including the respective roles between the Planning and Landmarks Preservation Commission, improvement of policies and criteria revolving around diversity, equity, and inclusion, and how these should be defined or operationalized for historic district review. These comments are generally consistent with the recommendations from both commissions following the last historic district review.

**Comments in support**

There were several comments received in support of the moratorium. Some of the key points in support of the moratorium include:

- 1. The current code is inadequate and policy amendments are needed.**

Although many areas of Tacoma need and deserve protection, the current policy and code is out of date, especially in the areas of diversity, equity, and inclusion, as well as sustainability and housing.



**2. The City should not accept historic district nominations with policy and code changes imminent.**

Since the historic district policies are going to be amended in the next cycle, it does not make any sense to create districts now and change the process and the effects of listing.

**3. Historic districts are an exclusionary tool.**

The City should not establish future historic districts. Historic districts exclude people who cannot afford single-family homes from high-opportunity areas of the city and contribute to the housing crisis.

**Comments in opposition**

The primary issues stated in opposition to a moratorium included:

**1. Moratorium is unnecessary.**

Many comments asserted that there does not appear to be an urgent need to establish a moratorium, especially considering that local historic district nominations are infrequent and that most recently the Commissions were able to accommodate the review of the district under the existing regulatory process. Moreover, moratoria are not necessary for the City to amend policies and code, and there does not appear to be a threat to public health or safety.

**2. Historic districts and homes are an important part of Tacoma.**

Several comments noted that there are benefits to Tacoma that historic districts bring, including promoting the preservation and reuse of existing housing stock and enhancing community.

**3. A moratorium will not improve equitable outcomes.**

Several comments noted that a moratorium could prevent other areas of the city, such as McKinley, Lincoln, and Hilltop from receiving the financial and development incentives that current historic districts enjoy, thus perpetuating inequity. Moreover, the City should be working proactively in these areas.

**4. Moratorium would be harmful to Tacoma.**

Some of the potential negative outcomes that were asserted included investment uncertainty around potential expansion of commercial historic districts such as the Union Depot Warehouse Historic District in downtown, as well as a general assertion that establishing a moratorium would prevent access to historic tax incentives for areas that desire to establish historic districts.

**5. Historic districts will not be an impediment to Home In Tacoma.**

Several comments noted that the City has repeatedly indicated that Home In Tacoma and historic designation can coexist and be compatible with one another.

**Landmarks Commission Discussion:**

The following are some discussion areas that the Planning Commission may wish to specifically seek input from the Landmarks Commission, in addition to other comments or feedback that the Landmarks Commission may wish to offer.

1. Necessity
  - a. Are there pending or anticipated historic district nominations within the potential period of a moratorium?
  - b. Does the Landmarks Commission believe that a moratorium would assist the Commission during the upcoming comprehensive plan review?

2. Effects
  - a. Will a moratorium prevent historic tax incentives from being available for historic projects?
  - b. Are there other negative effects on historic resources that would result from a temporary moratorium on historic district creation?
  
3. Duration and scope
  - a. Is the current scope (all locally designated historic and conservation districts) appropriate, or should it be limited or defined (for example, a comment noted that there may be interest in expanding existing districts near University of Washington Tacoma)?
  - b. If a moratorium were recommended, does the Landmarks Commission have input on duration? For example, should the end of the moratorium coincide with the adoption of revised Municipal Code and Comprehensive Plan policies in 2024, or are there other considerations?

### Review Schedule:

The schedule below outlines the steps for this review in coordination with the Landmarks Preservation Commission.

The schedule is as follows:

DATE	FORUM	SUBJECT
September 20	Planning Commission	<ul style="list-style-type: none"> <li>• Public hearing on moratorium</li> </ul>
October 4	Planning Commission	<ul style="list-style-type: none"> <li>• Debrief on hearing testimony</li> <li>• Summary of issues</li> <li>• Identify key questions for LPC input</li> </ul>
October 11	Landmarks Commission	<ul style="list-style-type: none"> <li>• Review testimony</li> <li>• Adopt response to Planning Commission</li> </ul>
November 15	Planning Commission	<ul style="list-style-type: none"> <li>• LPC feedback presented to Planning Commission</li> <li>• Finalize recommendations to Council</li> </ul>
TBD	Council Study Session	
Jan-Feb 2024 TBD	City Council	<ul style="list-style-type: none"> <li>• Resolution on moratorium (TBD)</li> </ul>

### Staff Contact:

- Reuben McKnight, [rmcknigh@cityoftacoma.org](mailto:rmcknigh@cityoftacoma.org)
- Brian Boudet, [bboudet@cityoftacoma.org](mailto:bboudet@cityoftacoma.org)

### Attachments:

- Attachment 1 – Public Comments Received
- Attachment 2 – Staff response to Commission questions

c. Peter Huffman, Director





## Consideration of a Moratorium on Nomination and Designation of Historic Special Review and Conservation Districts

### Public Comments Received

#### List 1 – Commenters of Written Comments (Received through September 22, 2023)

No.	Name	Page
1.	Baarsma, Bill	5
2.	Bennett, Peter	6
3.	Brooker, Kathleen	8
4.	Buffington, Ross	9
5.	Butler, John	10
6.	Corso, John	11
7.	Cade, Deborah	14
8.	Day, Esther	16
9.	DeBarbieri, Lili	17
10.	Dugan, Julie	18
11.	Eichner, David and Jane	19
12.	Ellis, Erin	20
13.	Guatney, Jess	21
14.	Hart, Jonathan	22
15.	Klinzman, Stacey	23
16.	Knudson, Gary	25
17.	Lafreniere, Michael	26
18.	Larkin, Pam	29
19.	Lind, Catherine	30
20.	McClintock, Marshall	31
21.	Moore, Chris (Washington Trust for Historic Preservation)	32
22.	Murphy, Patrick	35
23.	Neal, Robert	36



<b>No.</b>	<b>Name</b>	<b>Page</b>
24.	Reed, Cathy	37
25.	Ryan, Jeff	38
26.	Solomon, Cam	41
27.	Stephens, Heidi	42
28.	Sullivan, Michael	43
29.	Urwin, Cathie	44

**List 2 – Commenters of Oral Testimony**  
(Received at Public Hearing, September 20, 2023)

No.	Name	Page
1.	Strobel, Andrew	45



**From:** [Bill Baarsma](#)  
**To:** [Planning](#)  
**Subject:** Proposed Moratorium  
**Date:** Friday, September 22, 2023 3:52:50 PM

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To the Planning Commission:

I have always had a high regard for the work of the Planning Commission. I can recall that after I left the dais and my term as mayor, I returned to the chambers to express my support for the commission's proposals to regulate and remove the intrusive large billboards then throughout our city. I was pleased that the council supported the commission's position to protect our neighborhoods and to take a step to enhance our quality of life.

In this regard, I wish to express my opposition to the totally unnecessary proposed moratorium on historic districts in Tacoma. The policy of historic districts was first established by the National Register and was enacted to protect older diverse working class neighborhoods from the destructive practices of Urban Renewal popular in the 1960's and 70's. We can see first hand the impact of Urban Renewal here by the removal of historic buildings—including apartments and living spaces—along Pacific Avenue replaced by the massive parking garages. The grand design then was to continue to remove the historic buildings along Pacific Avenue that we now see at UW Tacoma. Thankfully some visionary folks like Fred Haley convinced policymakers not to tear down those buildings to be replaced by towers of steel and glass. Thus, UW-T has a character and quality of a true campus setting with buildings that actually predate any on the main campus up north.

Tacoma has been characterized as a city of welcoming, diverse and affordable neighborhoods. I should note that I can attest to that having doorbelled nearly every one. The historic district policies of the city have enhanced that quality. As you well know, the last proposed historic district was considered and approved by the City Council over a decade ago. They are thoughtfully proposed and involve robust citizen involvement and discussion. I would submit that the districts evolve out of a true grass roots effort.

I was on the City Council when the proposed North Slope Historic District came before us. It was truly a memorable meeting involving thoughtful and at time intense debate. But it was clear that a decided majority within the proposed district supported its creation. I might note that no other issue in my tenure involved more community discussion and consideration. It was truly a successful model of direct democracy.

The current policies have been carefully drawn, approved and tested. There is no logical or rational policy justification to put such a moratorium in place. I strongly advise that you vote down this ill-advised proposal.

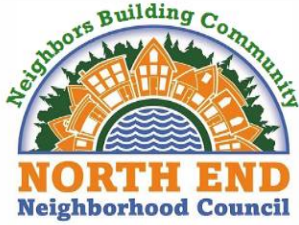
Bill Baarsma  
Tacoma, WA.

Sent from my iPad

**From:** [Peter Bennett](#)  
**To:** [Planning](#)  
**Cc:** [<board@nenc.org>](mailto:<board@nenc.org>)  
**Subject:** Comments - Planning Commission Agenda  
**Date:** Tuesday, September 19, 2023 5:04:50 PM  
**Attachments:** [NENC Historic District Moritorium.pdf](#)

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Please find attached a letter from the NENC on the issue of the proposed moratorium on local historic and conservation districts



North End Neighborhood Council

2522 N Proctor St, Box 418

Tacoma, WA 98406-5338

[www.NENC.org](http://www.NENC.org)

[www.facebook.com/NENCTacoma](https://www.facebook.com/NENCTacoma)

[www.twitter.com/NENCTacoma](https://www.twitter.com/NENCTacoma)

[info@nenc.org](mailto:info@nenc.org)

September 19, 2023

Tacoma Planning Commission and  
Tacoma Landmarks Preservation Commission  
747 Market St.,  
Room 345  
Tacoma, WA 98402

Dear Commissioners,

The board of the North End Neighborhood Council (NENC) is aware of the proposed moratorium on local historic and conservation districts and wishes to register our strong opposition to this action.

We have been given a copy of the letter written on this subject by Historic Tacoma and fully endorse the arguments and sentiments that are included in that communication. In addition to the substantive arguments advanced by Historic Tacoma, the NENC would also suggest that your Commissions should consider the unfortunate signals that a moratorium could send about the willingness of the City of Tacoma to consider the interests and concerns of the entirety of the city. We understand that different neighborhoods and populations have different concerns and priorities. It has been one of Tacoma's strengths to support a diversity of issues and agendas in all of our neighborhoods.

By implementing a moratorium on local historic and conservation districts, Tacoma risks alienating that part of our community that put a high priority on the preservation and maintenance of our historic neighborhoods and structures.

Please take the appropriate action to support inclusivity rather than division by opposing this proposed moratorium.

Sincerely

*Peter D. Bennett*

Peter Bennett  
NENC Board Chair

CC: NENC Board Members

**From:** [Kathleen Brooker](#)  
**To:** [Planning](#)  
**Subject:** Proposed Moratorium on new Historic Districts  
**Date:** Friday, September 22, 2023 2:26:41 PM

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Greetings.

I am writing in opposition to a proposed moratorium on historic districts in Tacoma. Historic districts were first established by the National Register as a way to broaden inclusion and representation of America's historic places. They were a response to the wholesale removal of older and working class neighborhoods during the Urban Renewal era of the 60's and 70's. The reinvestment in these neighborhood districts paid off in providing welcoming and affordable housing that has become,,especially in Tacoma..a tremendous asset. Areas like Hilltop, McKinley, and South Tacoma have now been surveyed and found eligible for the same status and benefits as have been enjoyed by our existing districts.

Please consider the unintended consequences of a moratorium which would delay or even block Tacoma's diverse neighborhoods from participation in historic preservation. All of Tacoma's residents deserve an opportunity to enjoy and improve their existing homes. Affordable housing starts at home.

Sincerely,  
Kathleen Brooker  
417 North M St.  
Tacoma 98403

Sent from my iPhone



**From:** [Ross and Julie Buffington](#)  
**To:** [Planning](#)  
**Subject:** Comments on Historic District Moratorium  
**Date:** Friday, September 22, 2023 3:36:42 PM

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Dear Planning Commission:

I am strongly opposed to the proposed local historic district moratorium. This proposed moratorium is unnecessary, ill-conceived, and contrary to the city of Tacoma's commitment to historic properties. I have lived in the city's Wedge Historic Neighborhood since its inception and I can attest that the historic designation of our neighborhood has had a positive impact on our community and the city of Tacoma as a whole. The Landmarks Preservation Commission does not need a moratorium to implement new policy and code recommendation. Tacoma needs to honor its commitment to preserving its historically valuable buildings and neighborhoods.

-Ross Buffington

502 S. Sheridan Ave.

Tacoma, WA. 98405

(253) 267-1066

**From:** [John Butler](#)  
**To:** [Planning](#)  
**Date:** Wednesday, September 20, 2023 1:26:31 PM

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Hello,

I am opposed to moratorium on historic districts proposal. We need more protections not less from greedy developers .

Thank you,

John Butler, Tacoma 98403.

**From:** [Deborah Cade](#)  
**To:** [Planning](#)  
**Subject:** NSHD comments re moratorium and PC  
**Date:** Wednesday, September 20, 2023 2:34:19 PM  
**Attachments:** [NSHD comment moratorium 09202023.pdf](#)

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Please see attached comment letter from North Slope Historic District for today's Planning Commission meeting.



# North Slope Historic District

908 North M St.  
Tacoma WA 98403

September 20, 2023

Dear Commissioners,

We see no need for a moratorium on historic districts before and while the Historic Preservation chapter of the Comprehensive Plan and land use code are reviewed and updated in 2024.

First, Home in Tacoma is the most massive change to the City's land use regulations since there have been such regulations. The Planning Department, the Planning Commission, and City Council were able to develop and make those changes to several Comprehensive Plan chapters in 2021 and 2022 with no one ever mentioning the need for any kind of moratorium. Updating the Historic Preservation chapter is minor by comparison.

Second, both the Landmarks Preservation Commission (LPC) and the Planning Commission (PC) indicated some areas of needed modification of the local historic district designation process because of the College Park Historic District nomination. However, that is unsurprising since the last local historic district was created more than a decade ago in 2011.

It is important to note that Planning staff have repeatedly and emphatically stated that historic districts are not any impediment to Home in Tacoma, as they stated regarding the College Park nomination. Also, staff have found that the PC spent only three hours of commission time over 5 meetings on the College Park nomination, which is hardly onerous for a zoning overlay. It's about the same amount of time as the PC spent on the West Slope View Sensitive District.

LPC is reported to have spent 20 – 25 hours over a year during the height of the COVID pandemic on the same nomination. Again, this is hardly surprising given that district nominations are complex and reviewing them is a primary function of LPC, especially in the context of a national pandemic.

Given that only one new local historic district nomination has been submitted in over 10 years, it does not appear that LPC and PC need worry about being overwhelmed with historic district nominations. What that fact points to is really quite sad for Tacoma, which in the past has been

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September 20, 2023

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recognized for its innovative historic preservation efforts. The City should have more local historic districts, particularly in areas underserved by historic preservation, such as Hilltop, McKinley Hill, and Lincoln, that are rapidly seeing their history hauled to landfills. Providing additional resources to support research and proactively creating historic districts in these areas is time critical. It is also a critical aspect of any serious tree canopy protection and expansion as well as sustainability efforts.

Given the various and very serious issues facing the City from increased violent crime and out of control property crime, an ever increasing homeless and low-income housing crisis, and a rapidly declining downtown, we find an emergency moratorium on historic districts to be remarkably senseless and a waste of the City Council's time.

If the concern is "equity," then perhaps the Planning Commission and the Council should consider the fact that Tacoma is covered with View Sensitive Districts (VSDs) where virtually no Home in Tacoma Mid-scale areas are proposed. Perhaps the moratorium proponents' equity concerns might be better served by eliminating VSDs rather than historic districts.

Sincerely,

/s/

Julie Turner,

Secretary

Tacoma North Slope, Historic District Inc.

**From:** [J Corso](#)  
**To:** [Planning](#)  
**Cc:** [City Clerk's Office](#)  
**Subject:** Resolution 41266: Oppose moratorium on local historic districts  
**Date:** Friday, September 22, 2023 11:27:10 AM

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Dear Planning Commissioners,

I oppose Resolution 41226, the proposed moratorium on new local historic districts and conservation districts. As the Planning Commission has recently demonstrated, it can advise the city council to decline to consider a nomination without a moratorium in place.

It's my understanding that while CM Rumbaugh supports the nomination of individual structures to the Tacoma Register of Historic Places (TRHP), she unilaterally opposes the nomination of local historic districts. Further, I understand that the undocumented motive for Resolution 41226 is the fear that the Landmarks Preservation Commission will soon receive a flood of local historic district nominations triggered by Home in Tacoma Project policy and code. Clearly, the person who started this rumor, and the people who believe it and pass it along, have little or no experience nominating a local historic district to the TRHP. The city has already made nominating local historic districts to the TRHP very difficult, usually requiring years of community-building, researching the history of each building, assessing the integrity of each structure to help determine whether to categorize it as a contributing or non-contributing structure, and much more. It takes years to prepare a nomination for LPC review, and most efforts fail before a nomination is submitted to LPC. Consequently, LPC rarely receives nominations for new local historic districts, making this proposed moratorium unwarranted.

There is a need for studies and research designed to better inform policy and code decisions regulating the process for adding new local historic districts to the Tacoma Register of Historic Places (TRHP). Assuming the Planning Commission, Landmarks Preservation Commission and City Council decide to prioritize improving the process for nominating local historic districts to the TRHP, consider the following suggestions.

**Review the LPC deliberations: Track time spent debating the nomination grounded in the established criteria versus time spent discussing other issues.**

Given the high quality of the College Park Historic District nomination, I expected the commissioners to process this nomination much more quickly than they did. I agree with the claim in the Resolution that the Landmark Preservation Commissioners spent an unusually long time deliberating on the College Park Historic District nomination. Clearly, the COVID pandemic disrupted the deliberation process. Further, staff appeared to be especially lax at keeping the commission's deliberations grounded in the established criteria, allowing them to introduce their personal values into the debate and employ NIMBY tactics in an effort to terminate, or at least delay, the nomination. Last, the commissioners greatly increased the amount of time by asking the applicant to re-assess community support for the nomination and provide information to address their personal concerns, particularly regarding diversity, equity and inclusion (DEI). Given that LPC receives few nominations for new local historic districts, perhaps there's a need to track the amount of time spent in deliberations grounded in the established criteria versus time spent discussing other issues, noting the triggering events that caused the commission to deviate from efficiently accomplishing their task. Hopefully, the results of the analysis would be used in the spirit of helping the staff and commissioners learn to process local historic district nominations more efficiently.

**Review the Planning Commission deliberations: Track time commissioners spent asking basic questions about the nomination and the time staff spent answering them.**

When the nomination was on the Planning Commission agenda, it appeared that most of the commissioners were coming to the meeting unprepared to deliberate. That is, they were asking simple questions that were easy to answer had they read the nomination. Perhaps the city council and the commissioners need to have a discussion about workload per meeting, how many hours commissioners are expected to spend preparing for each meeting, how many days in advance commissioners need to receive the meeting materials, etc.

**Operationally define the principles of diversity, equity and inclusion (DEI), so the commissioners don't need to spend time during the meetings debating them, how to use them in their deliberations, etc.**

Many commissioners want to apply the principles of DEI into their deliberations. However, it appears that there is disagreement about the meaning of DEI and perhaps even more disagreement about how to incorporate the principles into their duties as commissioners. Further, some commissioners appear to find the DEI movement inherently discriminatory (e.g., racist, sexist, classist, etc.) and see no place for it in their deliberations. Commissioners appear to be having this debate in the context of their meetings. Perhaps the city staff need to define DEI for the commissioners, including guidance on when and how to apply the principles in their deliberations, so the commissioners aren't spending time debating this topic in the context of their meetings.

**Invest in researching and documenting Tacoma history.**

Many Commissioners want to incorporate history, and especially Tacoma history, into their deliberations. While I think it's important to incorporate the history of the city in deliberations, most of the commissioners are demonstrating that they understand little about history, especially Tacoma history. Instead, they're using pop-history to support their arguments, and pop-history is notoriously invalid. Other times, they're cherry-picking historical events to support/spin an argument. Perhaps more misleading, commissioners try to apply the history of other places like Selma, Birmingham, Washington, DC, etc. to their deliberations about Tacoma. Please consider investing in having professional historians use original records (e.g., Census data, deeds, police records, newspaper articles, maps, photographs, etc.) to document Tacoma history, perhaps focusing on the larger minority communities including the Salish, Chinese, Japanese, Croats, Blacks, etc.). This may help reduce the amount of time commissioners spent misquoting history and debating history during commission meetings.

Please consider these suggestions in your deliberations regarding the efficiency of commission meetings, particularly when the topic is the nomination of a new historic district to the TRHP.

Sincerely,  
John Geoffrey Corso  
701 N J St.  
Tacoma



**From:** [Esther Day](#)  
**To:** [Planning](#)  
**Subject:** Proposed Moratorium on new Historic Districts  
**Date:** Tuesday, September 19, 2023 5:33:46 PM

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Dear Planning Commission,

I am writing to make my voice heard. I am asking you to not place a moratorium on Local Historic District work.

These are benefits currently accruing to residents in the city's existing historic districts. However a moratorium on the formation of new historic districts will deny economic benefits and tax credits to property owners in historic neighborhoods like Hilltop, McKinley Hill, South Tacoma, Fern Hill, and Lincoln. That's not equity. In fact a moratorium, and the possible elimination altogether of any future historic districts, will lead to **greater** inequity.

Regards,  
Esther Day

**From:** [Lili DeBarbieri](#)  
**To:** [Planning](#)  
**Subject:** Proposed Moratorium on new Historic Districts  
**Date:** Tuesday, September 19, 2023 8:03:01 PM

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Please preserve our historic neighborhoods!

**From:** [Julie Dugan](#)  
**To:** [Planning](#)  
**Cc:** [Julie Dugan](#)  
**Subject:** Comments - Planning Commission Agenda - historic neighborhoods  
**Date:** Thursday, September 21, 2023 12:52:25 PM

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I'm writing to voice my opinion on the moratorium proposed for the designation of additional historic neighborhoods.

Tacoma needs to maintain it's architectural history. It's one thing that sets us apart from other cities, including Seattle.

While density and affordability are important, it is necessary to stop historic preservation.

We are getting multi story housing, but not at an affordable price. These mega apartments are changing our landscape, while ignoring the real needs of citizens.

Once demolished, history is gone.

Please don't sacrifice our city s history. Find another way.

Julie Dugan

**From:** [Jane Eichner](#)  
**To:** [Planning](#)  
**Subject:** Proposed Moratorium on new Historic Districts  
**Date:** Wednesday, September 20, 2023 9:38:14 PM

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We OPPOSE the proposed moratorium on historic districts. —David and Jane Eichner

**From:** [Erin Droeger](#)  
**To:** [Planning](#)  
**Subject:** Historic district  
**Date:** Thursday, September 21, 2023 11:52:35 PM

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To Whom It Concern:

I would like to express my support for the College Park Historic District nomination. I think it is extremely important and vital to preserve the homes and architecture throughout the College Park district, as well as the amazing history that encompasses the area. I do not want to see it ruined by developers who are simply looking to make an profit instead of what is best for the community and families of this area.

I would also like to add that I believe the moratorium on historic districts is unnecessary.

Sincerely,

Erin Ellis

Sent from my iPhone

**From:** [Jess Guatney](#)  
**To:** [Planning](#)  
**Subject:** Residents against Rumbaugh Moratorium  
**Date:** Tuesday, September 19, 2023 12:51:25 PM

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I believe that allowing Counsel member Rumbaugh, a real estate developer, to go forth with a moratorium to make historic neighborhoods more difficult to protect therefore easier to be demolished, is an absurd conflict of interest and should be rejected.

All around the north end, developers are buying homes, waiting until they are completely derelict, ignore pleas from residents to deal with constant break ins and trespassing, sometimes even allowing them to be burned down, is deeply negatively affecting the safety, health, and quality of life in our city.

2023 Examples include 207-213 North I Street, 201 & 205 N Yakima Avenue, and the entire 500 South L Street Block to name a few. These were affordable housing units, affordable commercial rentals, historical artifacts of Tacoma, being destroyed at the benefit of luxury apartment developers and parking lots. Please listen to the people who want to continue to make Tacoma a better place long term, not the people profiting off squashing it in the short term.

Jess Guatney  
District 2 Resident

**From:** [Jonathan Hart](#)  
**To:** [Planning](#)  
**Subject:** Proposed Moratorium for Historical Districts  
**Date:** Monday, September 18, 2023 1:58:43 PM

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Good afternoon planning commission:

As a former Landmarks Preservation Commissioner who was very outspoken regarding this topic, I felt inclined to reiterate my support for such a moratorium.

While I fully support and welcome the addition of new historical districts throughout Tacoma, I am also fully aware of the need to review and scrutinize the current bylaws and processes associated with the designation process. I believe that there needs to be a deep dive into the code which should be reviewed through a wide lens including DEI and addressing any systemic and antiquated code that may inadvertently discriminate, create undue hardship to different socio-economic classes within the neighborhoods, or otherwise reinforce racially motivated means and methods such as redlining. I think the later is a highly visible point - College Parks proposed boundary almost identically matches the old redlining boundaries that were once used.

There are many wonderful and historic neighborhoods throughout that should receive designation, but again I want to emphasize that the process needs to be refined, modernized and otherwise reviewed to ensure that Tacoma is living up to it's commitment to diversity, equity and inclusion.

Thank you for your time and consideration.  
Jonathan Hart



**From:** [Stacey Klinzman](#)  
**To:** [Planning](#)  
**Subject:** Citizen Comment re: Resolution 41226  
**Date:** Tuesday, September 19, 2023 10:04:04 AM  
**Attachments:** [Public Comment of Stacey A. Klinzman Res. 41226 9-18-23.docx](#)

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Dear Planning Commission, attached please find my comment on Tacoma City Council Resolution 41226.

Sincerely,  
Stacey A. Klinzman  
816 N J St.  
Tacoma, WA 98403

34  
816 N. J. St.  
Tacoma, WA 98403

September 18, 2023

Via Electronic Mail

Tacoma Planning Commission  
747 Market St # 345  
Tacoma, WA 98402

Re: Tacoma City Council Resolution No. 41226

Dear Commissioners:

I spent a great deal of my life on the East Coast, in Massachusetts and Connecticut, and grew up in a New England town incorporated in 1872 but originally settled in the 1600s. I have been surrounded by history and historic preservation throughout my life. Tacoma appears to lag far behind other cities and towns in the U.S. in its understanding of the value to the community of historic buildings. The city also fails to appreciate the fact that historic buildings, including historic homes, are at their very essences public Art with a capital "A." Anyone who has ever taken an Art History class knows this.

I do not support any moratorium on nomination and designation of Historic Special Review and Conservation Districts because it will create an environment whereby public Art may be destroyed, causing the character and beauty of neighborhoods to be irrevocably altered during the lengthy Comprehensive Plan review process. All this harm is likely to occur without creating the "equity access to housing options" the Tacoma City Council is promoting.

*The fact is nice neighborhoods are desirable places to live. The cost of housing in long established, built-up neighborhoods that are popular living places, whether historic or not, is expensive because demand will always exceed supply. This basic economic principle applies to single family homes as well as apartments in those areas.*

As far as the Tacoma City Council's concern about wasted staff effort, isn't it true that application fees defray the cost of staff's time reviewing and processing applications? Finally, the resolution is vague about Landmarks Commission and Planning Commission staffs' concerns about equity raised during their review of the application mentioned in the Resolution. What exactly is inequitable about preserving public Art?

Sincerely,  
*Stacey A. Klinzman*

**From:** [gknudson@harbornet.com](mailto:gknudson@harbornet.com)  
**To:** [Planning](#)  
**Subject:** Historic District Proposed Moratorium  
**Date:** Friday, September 22, 2023 4:22:32 PM

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Greetings-

My wife and I decidedly opposed to the proposed moratorium. Please count us in favor of the content of the letter submitted by Historic Tacoma on this topic.

In addition, please refer to public testimony on related topics, as this clearly supports broadly held values connected with planning issues in residential neighborhoods and related multi-use districts.

Here, I refer to

- Comments returned re: Home In Tacoma Phase 1, wherein residents affected by 'missing middle' projects and zoning changes generously conditioned approval on respect in planning and design for scale, context and character of the immediate surroundings.
- Home In Tacoma Phase 2, which scrupulously addresses points raised in Phase 1.
- UDS survey regarding Design Review focus and general requirements. While not schooled in planning or architectural design approaches, public response was still clearly in favor of respect for context and character of their beloved neighborhood commercial districts.
- Survey of residents of previously proposed College Park Historic District.
- Public surveys related to the Proctor Plan.

Proponents should be required to address the values represented over several years' time regarding neighborhood character in several contexts, and as supported by Historic District designations. Simple requests and conditions expressed in these interactions are not inconsistent with the focused identification and application of common-sense guidelines in Historic Districts.

And please do not stoop to addressing racially motivated 'redlining' accusations such as were tossed about without support during the College Park Historic District considerations.

Thank You.

Gary Knudson

33037 North 25th Street

Tacoma, WA 98406

**From:** [Michael Lafreniere](#)  
**To:** [Planning](#)  
**Subject:** Public Hearing re Historic District Moratorium  
**Date:** Monday, September 18, 2023 4:35:59 PM  
**Attachments:** [Outlook-ciwt1avq.png](#)  
[Moratorium Public Hearing letter.pdf](#)

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Please accept this letter as comment for the record with regard to the Sept 20 public hearing on the proposed Historic District Moratorium.

Michael Lafreniere  
Communications Director  
(253) 228-0925



# HISTORIC TACOMA

September 18, 2023

EDUCATION.

ADVOCACY.


PRESERVATION.


[www.HistoricTacoma.org](http://www.HistoricTacoma.org)**Board of Directors**


Bill Baarsma  
Jennifer Baersten  
Kathleen Brooker  
Steve Dunkelberger  
Ross Griffith  
Marshall McClintock


**Staff**

Michael Lafreniere,  
Outreach &  
Communications  
Director

 on Facebook  
@HistoricTacoma

 on Twitter  
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 on Instagram  
@HistoricTacoma

 [info@historictacoma.org](mailto:info@historictacoma.org)

*Mailing Address*  
PO Box 7664  
Tacoma, WA 98417-0664

Tacoma Planning Commission and  
Tacoma Landmarks Preservation Commission  
747 Market St., Room 345  
Tacoma, WA 98402

Dear Commissioners,

The board of Historic Tacoma strongly opposes the proposed moratorium on local historic and conservation districts. It is a solution in search of a problem. The Council's Resolution 41226 cites two primary reasons for a possible moratorium: 1) staff and volunteer time involved, and 2) the possibility of making some changes to the designation procedure.

Tacoma currently has four local historic districts, and the last was created in 2011. Since then, there has only been one proposed, the College Park Historic District. Historic and conservation district nominations require deep research, professional assessment, and much community engagement. We are not aware of any such efforts currently in the city beyond expressions of interest. The College Park nomination was submitted in June 2021 at the height of the COVID pandemic as we were all adjusting to prevention measures, and everything took longer. City staff has estimated that College Park was an item on Landmarks Preservation Commission's (LPC) agenda for 14 meetings over 11 months for an estimated 20-25 hours of meeting time, or about 2 hours/month. This is not surprising given COVID, the complexity of district nominations and that reviewing nominations is one of its primary functions. The Planning Commission (PC) is estimated to have spent about 3 hours over 5 meetings considering College Park, hardly unusual for a zoning issue. When a revised College Park nomination was resubmitted this year, LPC took about 1 hour in one meeting and the PC took about 30 minutes in one meeting to consider it. These are hardly large amounts of time.

The other claim for a moratorium is that potential revisions may be made to the City's historic designation process. With Home-in-Tacoma, the City is currently engaged in the most sweeping changes to zoning since it was established some 70 years ago. Yet no one has suggested a moratorium is needed on building permits or rezones while that is developed. Moreover, as we saw very clearly with the revised College Park nomination, LPC and PC can decide whether to consider a historic district nomination – even within 30 minutes. What more would a moratorium accomplish? More to the point, City staff have repeatedly made the point in several public meetings that historic districts are fully compatible and not in conflict with Home-in-Tacoma rezoning to achieve housing goals. The fact is that a moratorium is simply not warranted.

There are three major reasons to avoid a moratorium: to maintain Tacoma's long commitment to historic preservation; to continue uninterrupted development flexibility; and to support sustainability and conservation goals. Historic preservation has been an ongoing lifeline to maintaining and expanding a livable, productive city. It has been a primary force for development, tourism, and jobs. It is Tacoma's early, innovative, and nationally recognized historic preservation efforts that has remained a magnet for investment in our city's commercial, residential, cultural, and educational development. A historic district moratorium would severely harm that reputation and send a damaging message to residents and investors alike.

# HISTORIC TACOMA

A moratorium would erase flexibility the City needs. It is not unusual for historic and conservation district boundaries to be slightly adjusted. Right now, tens of millions of outside investment dollars are resting on the possibility of such an adjustment. Why? It is because these investors want some moderate assurance that their investment in historic rehabilitation will not be jeopardized by incompatible remodeling or demolition of adjacent historic buildings. A moratorium will send that investment elsewhere.

Importantly, historic districts help the city meet its sustainability goals. They preserve the massive amounts of embedded carbon in their old growth wood that is otherwise released into the atmosphere in landfills. They help the city retain and expand its tree canopy, which is rapidly decreasing to even lower levels and creating more urban heat islands. As has been shown, historic and conservation districts give neighborhoods, especially low income and minority neighborhoods, a voice in their future and increasingly a shield against gentrification and relentless demolition.<sup>1</sup> Historic districts encourage recognition of historic working-class neighborhoods and promote the reuse of affordable, appealing homes and apartment buildings from the past 100 years.

A moratorium on the creation of new historic districts would do little more than deny economic benefits and tax credits to property owners in potentially eligible historic neighborhoods like the Hilltop, McKinley Hill, South Tacoma, Fern Hill and the Eastside. That's not equitable ... in fact, a moratorium will lead to greater inequity.

Finally, we would like to direct the Planning Commission's attention to View Sensitive Districts (VSDs), which are far easier to establish and are far more incompatible with the City's current housing policies than historic districts. Buildings in VSDs are limited to 25 ft., or nothing taller than two stories. While VSDs cover 12% of Tacoma's area, local historic districts cover barely 1%. All of Tacoma's VSDs, except Old Town, are areas where racially restrictive covenants applied to entire developments, yet this is not the case with any current or proposed local historic districts. Northeast Tacoma is almost completely covered with VSDs and has the least amount of Mid-scale proposed, yet developers would love to build 3-5 story apartment blocks here. It is surprising that the Planning Commission is working to advance the establishment of VSDs in the name of equity, while at the same time sending a message that historic districts are inherently inequitable.

There is no substantive case to be made for establishing a moratorium on the formation of local historic districts, and the Commissions should recommend against doing so.

Respectfully,



Ross Griffith  
Vice-President  
Historic Tacoma

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<sup>1</sup> Aaron Passell, *Preserving neighborhoods: How urban policy and community strategy shape Baltimore and Brooklyn*, New York: Columbia University Press, 2021.

**From:** [pamela larkin](#)  
**To:** [Planning](#)  
**Subject:** Proposed Moratorium on new Historic Districts  
**Date:** Wednesday, September 20, 2023 10:30:05 PM

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Please do not consider a moratorium on Tacoma Historic Districts! The neighborhoods were rooted in diversity and held together by a spirit of brotherhood. Tacoma people stay and live here to be connected to their own roots and the heritage the diverse people groups established. The historic landmarks give citizens a sense of purpose, peace and security. They are inspired to do business to continue in the spirit of the community to keep it thriving and meaningful. We do not need to grow. If no one wants to live here, and when there's no producing of economy to even share with those who don't care where they live, but only require a roof of some kind - usually temporary, over their heads (if they really do). Selling and purchasing properties for 'flipping' them, are usually done by 'out of town-ers' who couldn't care less about how we live here.

Please do not be beholden to Federal dollars just because there's opportunities to spend, or big companies, or politicians who exploit this place as a stepping stone - Just to later move on from here; and those who will not, and do not live here, or care. Please just resist the temptation - say "no", and help our own citizens to thrive! Take care of us, then we'll have the ability to take care of others too. Many can be influenced and empowered by those who are near to them and in their lives every day. We don't need to shun our own and reach out to people, governments, politicians and corporations, who are not rooted and invested (live and work here) in this great city!

From Pam Larkin

Sent from my iPhone

**From:** [Catherine Lind](#)  
**To:** [Planning](#)  
**Subject:** Proposed Moratorium on new Historic Districts  
**Date:** Thursday, September 21, 2023 8:06:20 AM

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I am opposed to the moratorium on new historic districts. I don't believe a moratorium is necessary. The arguments for a moratorium are based on opinion not facts. I believe historic districts help preserve the character of a city. In fact the North Slope Historic District has one of the most densely populated residential neighborhoods in the city, so it does not prove to be counter to the stated goals of Home in Tacoma. It's possible to support Historic Districts and the goals of Home in Tacoma.

Catherine Lind

Sent from my iPhone



**From:** [Marshall McClintock](#)  
**To:** [Planning](#)  
**Cc:** [City Clerk's Office](#)  
**Subject:** Historic District Moratorium  
**Date:** Wednesday, September 20, 2023 10:18:40 AM

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Dear Planning Commission and Landmarks Preservation Commission

No moratorium on locally designated historic districts is necessary. It reduces the flexibility of the Landmarks Preservation Commission, the Planning Commission, and the Planning Dept. to adjust boundaries or to respond to neighborhood requests. As the recent handling of the resubmitted College Park Historic District nomination showed clearly, both the Landmarks Preservation Commission and the Planning Commission have adequate means of handling historic district nominations.

There are far more important issues for City Council, city staff and the City's various commissions to deal with than this foolishness.

Marshall McClintock  
701 North J Street  
Tacoma, WA

**From:** [Chris Moore](#)  
**To:** [Planning](#)  
**Subject:** Public Comments - Local Historic District Moratorium  
**Date:** Wednesday, September 20, 2023 2:21:25 PM  
**Attachments:** [WTHP ltr - Tacoma Planning Commission Resolution 41226.pdf](#)

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Tacoma Planning Commission,

Please find attached comments from the Washington Trust for Historic Preservation on the public process to determine whether a moratorium on the creation of new local historic districts is needed for the City of Tacoma.

Thank you for the opportunity to comment – please let me know if you have any questions.

Best,  
Chris

**Chris Moore** | Executive Director  
*he / him / his*

Washington Trust for Historic Preservation  
1204 Minor Avenue | Seattle, WA 98101  
206-624-9449 (o) | 206-930-5067 (c)

[preservewa.org](http://preservewa.org)



September 20, 2023

Tacoma Planning Commission  
[planning@cityoftacoma.org](mailto:planning@cityoftacoma.org)  
747 Market Street, Room 345  
Tacoma WA, 98402

[sent via electronic mail]

Re: Local Historic District Moratorium - Resolution No. 41226

Dear Tacoma Planning Commission:

The Washington Trust is a nonprofit organization dedicated to saving the places that matter in Washington State and to promoting sustainable and economically viable communities through historic preservation. We are Washington's only statewide nonprofit advocacy organization working to build a collective ethic that preserves historic places through education, collaboration, and stewardship. In this role

The City Council recently passed Resolution No. 41226, directing the Landmarks Preservation Commission (LPC) and the Planning Commission (PC) to conduct a public process for the purpose of recommending whether a moratorium on the nomination of local historic districts is warranted. The Washington Trust opposes such a moratorium for the following reasons:

- A moratorium is unnecessary. There are only four Historic Districts across the city listed in the Tacoma Register. The last to be listed – the Wedge Neighborhood Historic District – occurred in 2011. Since that time, only one additional local historic district has been nominated to the Tacoma Register – the proposed College Park Historic District. This nomination was ultimately denied by the Planning Commission in November 2022.
- The Resolution cites concerns over volunteer and staff time required to review local district nominations. Yet this is one of the primary functions of the LPC: to review nominations of eligible historic resources for consideration as individual landmarks or as part of a district. That only four local districts have been established points to the fact that district review is a relatively uncommon occurrence. And while the College Park Historic District nomination has been re-submitted for review, the amount of volunteer and staff time required to undertake this review should be significantly less given the short amount of time that has lapsed since the original review of this nomination.
- Review of the City's historic designation process is already slated to occur as part of the 2024 Comprehensive Plan update process. The public process the LPC and the PC would

be required to undertake simply to recommend whether or not a moratorium is needed could well extend in to 2024. As such, it seems inefficient (as well as an intense use of volunteer and staff time) to consider what may be a short-lived moratorium given review of the process proposed as part of the Comprehensive Plan update. Furthermore, the likelihood of an additional district nomination being submitted prior the 2024 Comprehensive Plan update seems unlikely, given the relative few numbers of local historic districts (the pending re-review of the College Park Historic District notwithstanding).

Overall, we share concerns of both the LPC and PC regarding issues of equity and the historic designation process. A review of the process, including criteria, eligibility, and the pathway to designation, should all be considered with an equity lens in alignment with the city's overall values and goals. But as so few district nominations are actually submitted, we simply do not think a moratorium is required given the staff time involved to consider such a question and the fact that review of the designation process is already set to occur in 2024. We appreciate the opportunity to comment and look forward to continued conversations about this important issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Moore".

Chris Moore  
Executive Director

**From:** [Patrick Murphy](#)  
**To:** [Planning](#)  
**Subject:** Proposed moratorium on the nomination of local historical districts  
**Date:** Thursday, September 21, 2023 7:14:48 PM

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Dear Members of the Tacoma City Council,

I hope this message finds you well. My wife Juli and I moved to the McKinley Hill district five years ago, and it has been a remarkable journey. We were thrilled when we discovered that this district, nestled in our beloved Tacoma, was named one of the top 10 historic places to live in the country by This Old House. This recognition not only filled us with immense pride but also shed light on the economic benefits and tax credits that historic districts like ours can offer.

What's even more remarkable about historic districts is their role in recognizing the value of our historic working-class neighborhoods. These districts promote the reuse of affordable, appealing homes and apartment buildings that have stood for over a century. They provide an opportunity for families and individuals to connect with the past while also offering affordable housing options. It is with great concern that I write to express my strong opposition to the recent proposal for a moratorium on nominating local historic districts in our city. Denying these economic benefits and tax credits to homeowners and our community would be a disservice to Tacoma's past and future, particularly for those in working-class neighborhoods like McKinley Hill.

Thank you,

Patrick Murphy

**From:** [bandgneal@thewiredcity.net](mailto:bandgneal@thewiredcity.net)  
**To:** [Planning](#)  
**Subject:** Testimony Against Historic District application moratorium  
**Date:** Friday, September 22, 2023 5:04:01 PM

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Members of the Tacoma Planning Commission:

I write to oppose the moratorium on Historical District Overlay applications. It is not the appropriate use of a moratorium to block applications. It is also not the appropriate time to consider a moratorium when you have had a pending application. Updates to codes, zoning and comprehensive plans are always scheduled to occur periodically. You do not dare to deny developers, you should not treat your citizens differently. From a Historic District application there is no imminent threat to public health or safety, such as studying the health effects of increased diesel emissions or the wisdom of locating giant warehouses in a designated groundwater protection district. To the contrary, the exhaust and waste disposal from the demolition and replacement of viable structures is in many ways very harmful to public health and the environment. Waiting for Home in Tacoma to be finalized may only cause more harm to neighborhoods that are constantly under imminent threat to be redeveloped. It can also be expected that the future effects of Washington's HB1011, coupled with continued tax breaks for developers, will only exacerbate the development of 4plexes or other multi-unit rentals. Simply increasing the sheer number of available housing units simply attracts more people to move into to this community, does little to address so-called missing-middle housing, create equity or affordable ownership opportunities, and fundamentally does not help the chronically underhoused who survive by living on our streets or hidden encampments.

Regarding allegations that Historical District designations somehow perpetuate racial discrimination, the evidence is perhaps inconclusive at best. Comparing studies of Washington DC with Tacoma Washinton create a false equivalence. Washington, the District of Columbia was created as a special District of itself to serve as our nation's capital, to house its Capitol as well as all other branches of our Federal Government. Historical Districts within that District are similarly unique with a mix of housing needs serving various residential purposes: Diplomatic, Bureaucratic and Political, as an enclave of a transient nature for the privileged and powerful, as well as those who are economically enslaved to serve those interests. There are other ways and probably better ways here in Tacoma of the other Washington to acknowledge and remedy the lingering effects of redlining, perhaps with interpretive signage in any clearly identifiable areas of deed restrictions or discriminating mapping. You are volunteers, I appreciate your work, I hope you are operating with the best of intentions. I urge you reject any recommendation for a moratorium on Historical District applications, and stand with the Landmarks Preservation commission to tell the policymakers of the Tacoma City Council that it is fundamentally unwise and very wrong to even consider such a moratorium with a valid application pending.

Robert Neal

**From:** [Cathy](#)  
**To:** [Planning](#)  
**Subject:** Historic Districts  
**Date:** Friday, September 15, 2023 3:40:23 PM

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Hi. I would like to propose a Hilltop Historic District before everything is torn down because of the light rail. There are some pretty cool neighborhoods up there.

Thanks,

Cathy Reed  
925 N Alder St 98406  
253-273-3034

**From:** [Jeffrey J. Ryan](#)  
**To:** [Planning](#)  
**Subject:** Tacoma Planning Commission - Public Hearing Comments for Sept 20 2023 meeting  
**Date:** Friday, September 15, 2023 9:29:21 AM  
**Attachments:** [City of Tacoma TPC ltr - Moratorium - 2023-09-15.pdf](#)

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Please add the attached written comment for the public hearing on the subject of a Historic District Moratorium.

Thanks,

Jeff

**Jeffrey J. Ryan, Architect**  
LEED AP, BD+C  
**College Park Historic District Association**  
3017 North 13th St.  
Tacoma, WA 98406

v 253.759.0161  
c 253.380.3197





September 15, 2023

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

Re: Proposed Moratorium on Nominations to the Tacoma Register of Historic Places.

Dear Members of the Commission,

In review of the subject of a moratorium under this kind of circumstance I feel that that this action would be unprecedented and warrant and this action should not be taken. Revisions to the city code are updated on a regular basis and this is to my knowledge the first time that a moratorium is under consideration for a discussion of updating a current code sections. There are many positive attributes to local historic districts for a city and yet there has been but one nomination in the last 12 years that has made it to the review process, there does not appear to be any need for an urgent hold on applications.

As I have noted corrections and updates to the policies and guidelines for the nomination process would be helpful in improving the transparency of a review process, improve the timeliness of a review and to streamline the process as to reduce the workload on City Commissions and staff. As CM Rumbaugh noted in her presentation on the subject before the council, the process can be burdensome on staff and commission time as it is currently approached. After reviewing the top 100 cities in the state, based on population, plus all cities that are part of the states certified local government program in historic preservation as administered by the DAHP; there are currently only four cities that require the review of a nomination by a Planning Commission. Since the Tacoma Landmarks Commission is a charter commission of equal standing perhaps the review process should be handled directly by the TLPC which would reduce duplication of the review process and saving considerable time and effort by the city.

Of the four cities that currently require Planning Commissions review prior a final review of a historic nomination of a district by the City Council, Tacoma is the only one that allow the Planning Commissions to veto a nomination prior to a review by our elected officials. The other three have no such restrictions, recommendations by a commission move on to the council. Bellingham in fact waives the review by the Planning Commission if the district is already on the State or National registry of historic places, since these are considered higher honors. The City of Lacey has not Landmarks Board so their Planning commission covers this review process. Mount Vernon has not historic district currently but a nomination would go on to their council with a recommendation by their planning commission.

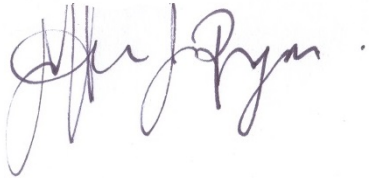
Based on the current requirements for the nomination of a district to the local register in Tacoma, there is no need for a review by two city commissions. The Tacoma Landmarks

Commission which has been selected to review the issue of preservation and history should be allowed to cover this subject as a charter commission with the expertise in the subject matter. This would reduce the redundancy of the current system and save considerable time, which as noted was the reason given by the councilmembers for the resolution before you.

It is my hope; the commission will refrain from imposing a moratorium on nominations that support the goals of many communities within our city. While I look forward an open public discussion regarding possible changes and improvements to the city's review process, to improve the process for the residents of the city; I ask that you chose not to impose a moratorium as part of this review process.

Thank you for your time and attention to this request.

Sincerely,

A handwritten signature in blue ink that reads "Jeff Ryan". The signature is fluid and cursive, with a small dot at the end.

Jeff Ryan, Architect  
LEED BD+C

College Park Historic District Association.

3017 North 13<sup>th</sup> Street  
Tacoma WA, 98406  
253.380.3197 c.  
jjryan@harboret.com

**From:** [Cam Solomon](#)  
**To:** [Planning](#)  
**Subject:** In support of resolution 41226  
**Date:** Monday, September 18, 2023 1:06:11 PM

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I very much support the moratorium on the consideration of any new historic districts.

We should address this in the comprehensive plan, and not waste staff of council time on individual requests.

When it comes to the comp plan, we should deny future historic districts. Old does not equal historic. This is just a process to exclude housing and people who can't afford a single-family home from high-resource neighborhoods. It's inequitable and serves to further worsen our housing and homelessness crises. It also forces the burden of increased multi-family housing into under-resourced neighborhoods that can least support new housing.

We all need to share the burden in order to successfully resolve our housing emergency.

Respectfully,

Cam Solomon  
514 N Sheridan Ave, Tacoma, WA 98403  
[biliruben@gmail.com](mailto:biliruben@gmail.com)  
206-724-2548

**From:** [Heidi S.](#)  
**To:** [Planning](#)  
**Subject:** Opposition to moratorium - 9/20/23 Public Hearing  
**Date:** Wednesday, September 20, 2023 12:32:13 PM

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Written comments to Tacoma Planning Commission: Opposition to Moratorium

RE: 9/20/23 Public Hearing

Commissioners,

Please reject this suggested moratorium of "Nomination and Designation of Historic Special Review and Conservation Districts" since it is:

- 1) simply not warranted, and
- 2) should be forwarded to the Board of Ethics to look into the the seeming conflict-of-interest of the City Council person(s) suggesting it, as well as why the Planning Department is also strangely promoting it.

Most importantly, though:

Prior presentations from the Planning Department to the public have claimed that historic designation would always be an option/opportunity for preservation when Home in Tacoma and Designated Growth Centers were being pushed upon us.

To remove that option, now (with this moratorium), would be a blatant betrayal of what had previously been promised to us.

Please do not support this moratorium, but recommend that the City Council decline to move it forward.

Thank you,  
Heidi Stephens

**From:** [michael sullivan](#)  
**To:** [Planning](#)  
**Cc:** [Allyson.Brooks@dahp.wa.gov](mailto:Allyson.Brooks@dahp.wa.gov); [miafreniere@gmail.com](mailto:miafreniere@gmail.com); [Bill Baarsma](#); [Laurie Jinkins](#); [Marshall McClintock](#)  
**Subject:** Historic District Moratorium  
**Date:** Friday, September 22, 2023 4:04:49 PM

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Dear Planning Commission,

I am writing in opposition to the proposed moratorium on the designation of historic/conservation districts. My particular experience and concern relates to existing and potential districts in the commercial districts of the city. The City Council's proposal, related to the preservation and conservation of quality buildings over 50 years of age, blocks the use of the Special Valuation Tax Incentive and withdraws an important program used in the adaptive reuse of existing buildings and structures.. This financial impact of the moratorium is not addressed or discussed in the proposed policy change language and support materials.

Notably, several commercial building conversions from office to residential use have depended on historic designation to become eligible for the Special Valuation Incentive and to cite the Historic Building section of the International Existing Building Code. These projects include the Washington Building (156 units), Tacoma Tower (100+ units), Sandberg Schoenfelds Building (75+ units). The shortest path to "historic" eligibility is inclusion in an existing or new historic district yet the proposed moratorium language does not address the amendment of boundaries for an existing Special Review District such as the Union Depot Warehouse SRD/conservation districts. Recent projects have created new housing units in this area and property owners around the UWT have been planning new projects based on expanded or new districts to access historic tax incentives.

Tacoma is an elder city in the American west and most of its built environment is made up of buildings that are more than 50+ years old. Clear policies related to adaptive reuse and environmental protection must be functional within land use plans and programs. Historic preservation has been a keystone in the City's development over the last few decades and dismantling mechanisms like historic/conservation districts is a signal that efforts like UWT or Union Station are no longer relevant in city planning policies.

Michael Sullivan  
19 Orchard Road  
Tacoma, WA. 98406

Sent from [Mail](#) for Windows

**From:** [Cathie Raine](#)  
**To:** [Planning](#)  
**Subject:** Moratorium on Formation of Tacoma Historic Districts  
**Date:** Friday, September 22, 2023 4:41:58 PM

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Dear Planning Commissioners,

I am writing to state my opposition to the proposed moratorium on formation of new historic districts in Tacoma. The historic areas of Tacoma neighborhoods are what make Tacoma an interesting city to explore. Each area of Tacoma offers a unique picture into the history of some of the people of Tacoma...and, also the ability of the people in these unique neighborhoods to work for something wonderful for their families and the City.

Putting a moratorium in place now short-changes the residents in these other multiple neighborhoods in Tacoma. Tacoma has been described as a "tale of 2 Cities" with the existence of some historic and 'revered' areas contrasting with the formerly "redlined"/ continued industrialized areas in Tacoma.

This moratorium proposal is not warranted and could lead to greater inequity in Tacoma. I also understand that preservation of historic districts fits well into the City of Tacoma's 'Home in Tacoma' rezoning plans. We need to be able to promote historic areas and the re-use of affordable, appealing houses and apartment buildings to help with meeting the housing needs of residents. Having a City with multiple historic districts also helps with people's decisions with choosing Tacoma as a new place to live.

Please do not consider an approval of this proposed moratorium. All of the residents in Tacoma deserve the opportunity to preserve and honor the history of their neighborhoods!

Respectfully submitted,

Cathie (Raine) Urwin  
5002 S Wapato Street  
Tacoma, WA. 98409  
Phone #: (253) 431-6689



## Oral Testimony

### Public Hearing – Consideration of a Moratorium on Nomination and Designation of Historic Special Review and Conservation Districts

September 20, 2023

1. **Andrew Strobel** – I am testifying today to urge the Planning Commission to adopt a temporary moratorium on special review and historic districts. I believe the current code for historic districts is inadequate to address several needs of our City, including housing infrastructure and the very nature of the code which is centered on the preservation of historic resources throughout our City. I support a moratorium for the following reasons. The first reason is preemption. It is my understanding that the Planning Commission is also considering the warrants to eventually address changing the historic district code as part of the joint review with the Landmarks Commission. In advance of any code changes, the City and residents should enjoy preemption from any potential historic district applications that would be potentially considered as the Planning Commission was reviewing the code. Changes in the code could potentially change the legislative process for adoption of a historic district. It would be confusing to residents to follow any historic district adoption process while fundamentally changing the criteria for becoming a historic district through the code changes. Secondly, the City is undertaking huge steps to address our housing crisis through Home In Tacoma. The existing code, effectively, is vague enough that I believe that there are few places in the City that could be actually denied on their merits as a historic district. Concurrently Home In Tacoma is addressing our needs for additional density in different housing types. Until we address that process and understand development expectations for missing middle housing, I believe considering a historic district application as that process is being legislatively adopted would be counterintuitive to the goals of Home In Tacoma. Third, the existing policy does not take into account City of Tacoma's Resolution No. 40622, addressing policies that facilitate systemic racism. I believe there needs to be an additional look about how historic districts may or may not perpetuate historic red lining of our communities. A 2021 study of Washington DC historic districts found that the historic districts largely aligned along racial lines where 62% of the districts were populated by non-Hispanic whites and 15% by non-Hispanic black populations. While the rest of the City that were not historic districts were 31% non-Hispanic whites and 49% non-Hispanic blacks. I don't state these demographics to be conclusionary, but I think the City has to study this before employing further historic districts. In closing, I hope the Planning Commission considers adoption of this pause until the code can be properly addressed, and the commission can undertake some critical work in advance of addressing historic districts. The existing code allows an applicant to apply and apply again if rejected. Greatly disturbing the City and the Planning Commission's ability to get work done. Elements as simple as that warrant a pause and future code update.

--- (Public Hearing closed at 6:15 p.m.) ---









**City of Tacoma**  
Planning and Development Services

**Planning Commission**  
**Proposed Moratorium – Local Historic Districts**  
**October 4, 2023**

**Commission questions/Staff Response**

The following is submitted in response to Commission questions following the September 20, 2023, public hearing.

**1. Commissioner Marlo**

*What is the timeline for the 2024 Comprehensive Plan and Code Amendment package and how does the moratorium recommendation relate to that?*

Answer:

The deadline for the adoption of the 2024 amendment package is the end of 2024, but the legislative adoption process may take longer due to the anticipated scope of the next amendment. The Planning Commission has a choice to recommend no moratorium, or a moratorium with a duration of either six months, or a year. A moratorium lasting a year would require the City to adopt a workplan, which could be the amendment adoption schedule, if so adopted. If needed, a moratorium can be extended in six-month increments. In terms of schedule alignment, if the Planning Commission recommends a moratorium to Council, a one-year moratorium would likely terminate near the scheduled adoption of the new Comprehensive Plan and regulatory code at the end of 2024, assuming it is enacted near the beginning of next year. A six-month moratorium would likely require an extension, as the amendment process still be will underway when it terminates.

**2. Vice-Chair Steele**

*How would creation of historic districts affect implementation of Home In Tacoma and related legislation such as House Bill (HB) 1110, if the City were not to adopt a moratorium?*

Answer:

The question of how historic districts and Home In Tacoma will interact is both large and central to current policy discussions. The City is currently evaluating the impacts of Home In Tacoma on historic preservation, as well as the impacts of historic preservation on the objectives of Home In Tacoma. It is likely that the zoning amendments in the Home In Tacoma package will result in increased redevelopment pressure on existing structures and buildings, which likely will include both historically eligible and historically designated properties. The regulatory framework for Home In Tacoma is still being developed, and the City is currently working on the Environmental Impact Statement to characterize such impacts. The moratorium process itself is not intended to assess those impacts.

In short, historic districts require design review approval for exterior alterations within the district, representing an additional review step in the permitting process that properties not within historic districts are not required to take. This also includes approval by the Landmarks Commission for

demolitions within historic districts (local and National Register listed districts currently require Landmarks approval for demolitions, and demolition permits in these locations can be denied for historic preservation reasons). If a new historic district were established under current regulations, these provisions would affect development proposals going forward. The base zoning will generally determine development standards and land use requirements, and historic design review would be required for the exterior appearance subject to the existing design guidelines for the district.

Lastly, HB 1110 (2023) exempted historic preservation from its limitations on design due to anticipated impacts that would result from eliminating historic protections.



**To:** Planning Commission  
**From:** Stephen Atkinson, Planning Services Division  
**Subject:** **South Tacoma Groundwater Protection District**  
**Memo Date:** September 28, 2023  
**Meeting Date:** October 4, 2023

**Action Requested:**

Direction – Scope of amendments for impervious surface standards, landscaping, and high risk/impact uses.

**Discussion:**

At the Planning Commission’s meeting on October 4, 2023, staff will present an initial comparison of critical aquifer recharge standards for Pierce County jurisdictions that have jurisdiction within the South Tacoma Aquifer with a focus on the following:

1. Impervious Surface Standards
2. Landscaping Standards
3. High Risk/High Impact Uses

In particular staff will be seeking direction on the geographic scope of the amendments. Based on an initial review of standards, staff is recommending an initial focus on updating standards within industrial zoning districts within the South Tacoma Groundwater Protection District. To support this discussion staff has attached a discussion outline and code comparisons for each of the topics listed above.

**Project Summary:**

The Growth Management Act (GMA) requires the designation and protection of “Critical Areas” to prevent harm to the community from natural hazards and to protect natural resources. The GMA defines Critical Aquifer Recharge Areas as those with a critical recharging effect on aquifers used for potable water.

The goal of establishing Critical Aquifer Recharge Areas is to protect the functions and values of a community’s drinking water by preventing pollution and maintaining supply. Critical Aquifer Recharge Areas are defined as “areas with a critical recharging effect on aquifers used for potable water, including areas where an aquifer that is a source of drinking water is vulnerable to contamination that would affect the potability of the water or is susceptible to reduced recharge.”

This project will review and update Tacoma Municipal Code Section 13.06.070 South Tacoma Groundwater Protection District and Tacoma Municipal Code Section 13.11.800 Aquifer Recharge Areas, in accordance with the Work Plan as adopted by Substitute Resolution No. 40985 and as modified by Ordinance No. 28872 enacting a moratorium on underground storage tanks and metal recycling/auto wrecking facilities within the South Tacoma Groundwater Protection District.

**Prior Commission Review:**

- 2021-2022: The Commission reviewed and recommended an overall work plan for the South Tacoma Groundwater Protection District.



- 2022-2023: The Commission and then City Council considered and adopted a moratorium on certain uses within the South Tacoma Groundwater Protection District.
- June 21, 2023: Staff provided an update to the Commission on the overall scope of work, as amended following the adoption of the moratorium.

**Staff Contacts:**

- Stephen Atkinson, Principal Planner, [satkinson@cityoftacoma.org](mailto:satkinson@cityoftacoma.org)
- Maryam Moeinian, Senior Planner, [mmoeinian@cityoftacoma.org](mailto:mmoeinian@cityoftacoma.org)

**Attachments:**

- Attachment 1: Discussion Outline
- Attachment 2: Impervious Surface Standards
- Attachment 3: Landscaping
- Attachment 4: High Impact Uses

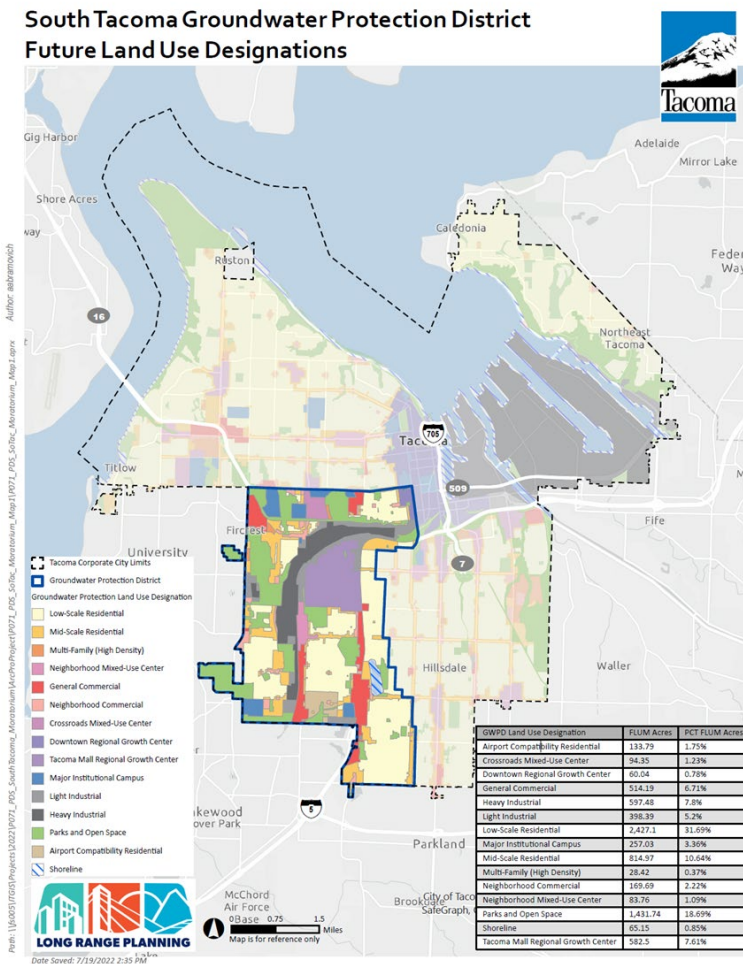
c. Peter Huffman, Director

## South Tacoma Groundwater Protection District Discussion Outline

October 4, .2023

### Discussion Topic 1: Geographic Scope of Potential Code Amendments

- A. Background: Staff is requesting the Commission consider the geographic scope for code amendments related to impervious surfaces and landscaping within the South Tacoma Groundwater Protection District. The map below depicts the overall boundaries of the STGPD and the Comprehensive Plan Land Use Designations within this area. As shown on the map, approximately 43% of the area is designated Low and Mid-Scale and is part of the Home in Tacoma Zoning Update. Approximately 19% of the area is designated to remain Parks and Open Space. Of the remaining area, the STGPD includes the Tacoma Mall Regional Growth Center, two Mixed Use Centers, multiple business districts and commercial shopping districts, as well as major institutional campuses. Industrial districts comprise 13% of the area, the majority of which is part of the South Tacoma Manufacturing and Industrial Center.



## Attachment 1: Discussion Outline

## B. Options for Geographic Scope:

- Preferred Option: Focus impervious surface and landscaping code amendments on the South Tacoma Manufacturing and Industrial Center.
  - Rationale: Address lowest baseline in code and code gaps; Avoid conflicts with Home in Tacoma zoning updates; Responsive to community concerns around compatibility of industrial uses; Scope better aligns with staff resources and capacity for engagement and analysis; Greater likelihood of completion in 2024.
- Alternative: Comprehensive code update for all land use designations and zoning districts within the South Tacoma Groundwater Protection District.
  - Pros: Greater code consistency across the STGPD; Responsive to community concerns regarding aquifer recharge and tree canopy; Potential to improve development outcomes across the district.
  - Cons: Likely requires significantly broader scope of engagement and analysis taking into account a diverse range of land use types and zoning districts; Likely requires additional time to develop the range of code amendments; Potential to conflict with current Home in Tacoma zoning update and/or to possibly slow progress on Home in Tacoma to incorporate impervious surface standards; Would require revisiting the Tacoma Mall Subarea Plan.

**Discussion Topic 2: Code Benchmarking and Gap Analysis****A. Impervious Surface Standards (See Attachment B for code comparison)**

- a. City of Tacoma Baseline: No explicit impervious surface limitation in the land use and zoning code.
- b. Pierce County: Applies specific impervious surface limitations to all land use designations, including the Frederickson Employment Center, within the aquifer recharge areas. Includes site flexibility.
- c. University Place: Applies a general and flexible standard to minimize impervious surfaces.

Staff Observations: The Pierce County code provides more upfront predictability on the standards than University Place. Pierce County's code is also a more appropriate benchmark given its applicability to a designated Manufacturing and Industrial Center (MIC) comparable to South Tacoma MIC.

Recommendation: Consider an impervious surface standard for industrial districts within South Tacoma.

**B. Landscaping Standards (See Attachment C for code comparison)**

- a. Overall Site Landscaping Requirements

Staff Observations: The City of Tacoma currently requires significantly less overall site landscaping than the Pierce County comparison both in that Tacoma requires a smaller overall percentage and the percentage is based on a smaller site area than in Pierce County.

## Attachment 1: Discussion Outline

Recommendation: Staff recommends consideration of amendments to the Overall Site Landscaping Standards for the South Tacoma MIC.

b. Site Perimeter

Staff Observations: Tacoma Municipal Code currently exempts Industrial districts from Site Perimeter landscaping requirements. Pierce County's comparison code does not require site perimeter landscaping universally, but rather in specific situations to provide buffering and limit off site impacts. Site perimeter landscaping is an important component in limiting noise, light, and aesthetic impacts of industrial activity.

Recommendation: Staff recommends consideration of Site Perimeter Landscaping standards for the South Tacoma MIC.

c. Street Trees

Staff Observation: Tacoma Street Tree standards currently apply universally to all uses and zoning districts with only a few exceptions. Currently, the South Tacoma Way MIC is subject to these standards.

Recommendation: Street Tree requirements are adequately addressed in the current code and do not need to be revisited at this time.

d. Parking Lot Landscaping

Staff Observations: City of Tacoma municipal code currently exempts the M-2 Heavy Industrial Zoning district from parking lot perimeter landscaping standards. Pierce County code requires perimeter parking lot landscaping wherever the parking lot abuts a public road. Currently both jurisdictions require interior parking lot landscaping for industrial zones and uses.

Recommendation: Staff recommends consideration of perimeter parking lot landscaping standards for the South Tacoma MIC. Interior parking lot standards are currently addressed and do not need to be revisited at this time.

e. Landscaped Buffers

Staff Observations: The City of Tacoma code utilizes landscaped buffers when an industrial district abuts a residential R-District zone. These zones exclude other districts that allow for residential uses or other sensitive uses. Pierce County's code utilizes both a site perimeter standard for industrial districts abutting residential districts, but also a use-based standard that mitigated use compatibility regardless of the zone the uses are located in.

Recommendations: Consider updating landscaped buffer standards to incorporate a use-based buffer standard to improve compatibility between industrial uses and adjacent sensitive uses.

**C. High Impact Use Review (See attachment D for code comparison)**

Staff Observations: Multiple jurisdictions currently regulate land uses within the South Tacoma aquifer, including Tacoma, Pierce County, Lakewood and University Place. Each jurisdiction shares a common regulatory approach that restricts land uses that pose a high risk or impact to aquifer recharge areas and water quality. However, the list of uses and approach to regulations and permit processes vary among the jurisdictions. Overall, the City of Tacoma appears to be the most restrictive and comprehensive in uses that are outright prohibited within the STGPD, when considering the list of uses that are otherwise prohibited in the M-2 Zoning District. Likewise, the City and TPCHD have low thresholds for hazardous substances that trigger permit requirements and regulation within the area. Tacoma's focus on hazardous substances on-site ensure a broad applicability of the regulations and permitting across residential, commercial, and industrial uses. Staff does note that there are uses currently regulated in other jurisdictions that could be considered by the City of Tacoma within the STGPD for broader countywide consistency.

Recommendations: According to the STGPD standards "the above high impact uses should be periodically revised, updated, and amended, as appropriate...in order to take into account other potential high impact uses or improvements in technology, pollution control, and management." Staff recommends conducting this review as part of the STGPD code amendments but concludes that additional consultant services are likely necessary to support this effort. Furthermore, given that the aquifer recharge area is a countywide resource, staff recommends conducting this work in partnership with the TPCHD and adjacent jurisdictions to consider regulatory improvements countywide.

Alternative: In-lieu of additional consultant services, staff could consider a more limited review and update focused on the listed uses currently regulated among the baseline jurisdictions.



## Attachment 2: Impervious Surface Limitations

Impervious Surface Limitations in Aquifer Recharge Area		
Tacoma	Pierce County	University Place
Nothing specific to STGPD/aquifer recharge	<p><b>Section 18E.50.040</b></p> <p><b>A. General</b></p> <p>All regulated activities that are not exempt, prohibited, or otherwise excluded, shall ensure sufficient groundwater recharge. In order to achieve sufficient groundwater recharge the applicant shall either comply with the impervious surface limitations set forth in Table 18E.50.040-A or demonstrate that the volume of water infiltrated at the proposed project area will be the same or greater amount for post-development as the pre-development volume.</p> <p>(1) The maximum impervious surface coverage is calculated for the total amount of impervious surface per each individual site. The percentage for maximum total impervious surface per lot or site may be exceeded if the applicant can demonstrate that the effective impervious surface on the site is less than or equal to what is allowed for the total impervious surface.</p>	<p><b>17.20.015 Regulation.</b></p> <p>A. Permeable Surfaces. Uses that are not identified as a threat to the aquifer shall provide as much open permeable space as possible and impervious surfaces shall be minimized. Carefully planned site layout and design may significantly reduce the need for impervious surfaces, which in turn can help promote the health of the City's water resources and reduce costs associated with development of surface water control and treatment systems. Property owners shall practice appropriate disposal of hazardous substances and other pollutants to protect aquifer health.</p>

## Attachment 2: Impervious Surface Limitations

<b>Table 18E.50.040-A. Aquifer Recharge Area</b>	
<b>Impervious Surface Limitations</b>	
<b>Comprehensive Plan Land Use Designation</b>	<b>Maximum Impervious Surface Coverage (1)</b>
<b>Urban Land Use Designations</b>	
Employment Center	60%
Major Urban Center	75%
Activity Center	50%
Community Center	50%
Neighborhood Center	50%
Mixed Use District	75%
High Density Residential District	50%
High Density Single Family	50%
Moderate Density Single Family	35%
Public Institution	60%
Urban Military Land	Not Applicable
Master Planned Community	20%
Employment Based Planned Community	20%
<b>Rural Land Use Designations</b>	
Essential Public Facility Rural Airport North	PUD
Essential Public Facility Rural Airport South	PUD
Rural Activity Center	60%
Rural Neighborhood Center	50%
Gateway Community	50%
Rural Separator	10%
Rural Sensitive Resource	10%
Rural Farm	10%
Rural 10	10%
Rural 20	10%
Rural 40	10%
Reserve 5	10%
Master Planned Resort	10%
Rural Military Land	Not Applicable
<b>Natural Resource Land Designations</b>	
Designated Forest Land	Not Applicable
Agricultural Resource Land	Not Applicable

Landscaping Requirements in the Industrial Zone: Tacoma vs. Pierce County		
	Tacoma	Pierce County
Overall Site Landscaping/ Trees	<p><b>Section 13.06.090 (B)(4)(d)</b> <i>(2) Overall Site Landscaping Minimums:</i></p> <p>This requirement may be provided anywhere on the site. The amount is determined as a percentage of the site which is not covered with structures. It may be satisfied by landscaping provided to meet other requirements.</p> <ul style="list-style-type: none"> <li>➤ <b>Industrial Districts: 5 percent of parking areas over 20,000 sf</b></li> </ul>	<p><b>Section 18J. 15.040 (F) (1)</b></p> <p>F. Landscaping in Employment Corridor (ECOR), Neighborhood Corridor (NCOR), Towne Center (TCTR), and Urban Corridor (UCOR) zones.</p> <p><i>1. Overall Landscaping:</i></p> <p>Each project site shall dedicate <b>10 percent of the area of the site not occupied by buildings</b> with landscaping. Other landscape requirements, such as low impact development best management practices, parking lot landscaping, parking garage landscaping, and perimeter landscaping requirements, may be counted toward this requirement when planted at the prescribed levels.</p> <ul style="list-style-type: none"> <li>➤ <u>Total project area – building area = applicable area</u> <u>Applicable area x 10% = required landscape area</u></li> </ul> <p>b. When structured parking is provided, this requirement may be reduced by the same percentage of parking provided within the structure.</p> <p>c. Up to 1/3 of the total landscaping area requirements for this Section can be met using green roofs and/or rooftop gardens.</p>
Site Perimeter Landscaping	<p><b>Section 13.06.090 (B)(4)(e)</b> <i>(2) Exceptions:</i></p> <ul style="list-style-type: none"> <li>➤ <b>Site Perimeter Landscaping is not required in Industrial Districts</b></li> </ul>	<p><b>Section 18J. 15.040 (F) (2)</b></p> <p><i>F.2 Perimeter Landscaping.</i></p> <ul style="list-style-type: none"> <li>b. Non-industrial uses shall install a Level 2 Landscape Buffer per PCC 18J.15.040.H.2 along all project boundaries adjacent to an urban or rural residential zone.</li> <li>c. Industrial uses shall install a Level 3 Landscape Buffer per PCC 18J.15.040.H.3 along all project boundaries adjacent to an urban or rural residential zone.</li> </ul>

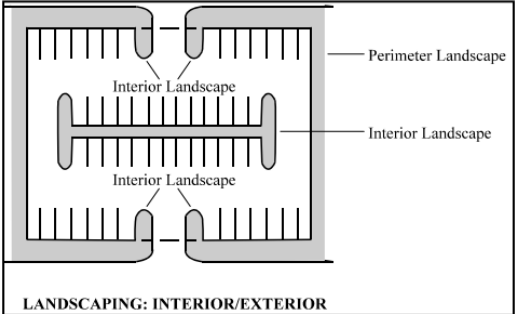
## Attachment 3: Landscaping Code Comparison

		<p><a href="#">Section 18J. 15.040 (H)</a></p> <p>2. Filtered Screen (Landscape Level 2 – L2). This landscaping is intended to provide a visual separator between different types of non-residential uses and intensities and different types of residential uses and densities. Examples of use: interior lot line buffering between residential and existing office, civic, or commercial uses, between office and industrial development, and between mobile home parks and multi-family housing.</p> <p>3. Full Screen/Berm (Landscape Level 3 – L3). This level is intended to provide a physical and visual separator between incompatible uses or intensities/densities where a complete noise barrier is not necessary. Examples of use: interior lot line buffering between single-family development and commercial, office, industrial, or multi-family uses, between multi-family development and non-residential uses or arterial roadways/urban highways, between public schools and commercial and industrial uses, etc.</p>
Street Trees	<p><b>Section 13.06.090 (B)(4)(f)</b>  <i>(3) Planting Requirements:</i></p> <ul style="list-style-type: none"> <li>➤ Four Small Trees; three Medium Trees; or, Two Large Trees per 100 linear feet of site frontage.</li> <li>➤ Street trees should generally be evenly spaced to create or maintain a rhythmic pattern, but can be provided with variations in spacing and/or grouped to accommodate driveways, building entrances, traffic signs, or other streetscape features, or if such variations are demonstrated to better achieve the intent.</li> <li>➤ Street trees shall, when possible, be planted within the right-of-way adjacent to the curb and between the pedestrian lane/sidewalk and curb. When this is not possible or a different location would better achieve the intent, street trees may be located elsewhere within the right-of-way, including behind the sidewalk, in street medians,</li> </ul>	<p><a href="#">Section 18J-15.040 (F)(2)(a)</a></p> <ul style="list-style-type: none"> <li>➤ Street trees shall be planted per PCC 18J.15.050 along all road frontages. Street trees shall be planted within the road right-of-way, with approval by the appropriate agency. When street trees cannot be accommodated within the right-of-way, they shall be located as close to the right-of-way as possible.</li> </ul> <p><a href="#">Section 18J.15.050</a></p> <ul style="list-style-type: none"> <li>➤ A. Street trees shall be installed along both sides of all urban roads in urban areas only. Flexibility may be allowed when requirements for low impact development (LID) best management practices (BMPs) preclude street trees on both sides of a road.</li> <li>➤ B. Design Objective. Provide buffers along street corridors to increase privacy and minimize noise impacts.</li> </ul>

## Attachment 3: Landscaping Code Comparison

	<p>parking strips or bulbouts. If neither of these preferred locations is possible, such as when existing infrastructure prevents trees from being planted within the right-of-way, trees located within 10 feet of the right-of-way may be counted as street trees.</p>	<p>C. Standards.</p> <ol style="list-style-type: none"> <li>1. Street trees located within public or private rights-of-way shall be installed consistent with the requirements of Title 17B PCC, Road and Bridge Design and Construction Standards.</li> <li>4. Placement. Street trees shall be placed within the public or private road right-of-way unless there is a safety reason not to as determined by the County Engineer. In that event, the street tree requirement shall be met by placing trees on private property within 15 linear feet of the road right-of-way.</li> <li>5. Minimum mature height shall be 20 feet.</li> <li>6. Refer to PCC 18J.15.100, Plant Lists, for a list of appropriate street tree species.</li> <li>7. When permitted, any tree installed within 5 feet of public or private road pavement edge, curbing, or sidewalk, or within required parking areas shall include a root control barrier. Root control barriers shall consist of galvanized metal or plastic sheets extending a minimum of two feet below the finished grade of the surrounding surface or as directed by the County Engineer within public road rights-of-way.</li> <li>8. Within the Employment Corridor (ECOR), Neighborhood Corridor (NCOR), Towne Center (TCTR), and Urban Corridor (UCOR) zones, street trees shall be located within the right-of-way, with approval by the appropriate agency. When approval is not granted, trees shall be installed as close to the right-of-way as possible.</li> </ol> <p>D. Guidelines. Within the Employment Corridor (ECOR), Neighborhood Corridor (NCOR), Towne Center (TCTR), and Urban Corridor (UCOR) zones, potted trees or similar tree installation methods are allowed. The size of the container shall be determined by the landscape architect, forester, or other qualified expert, subject to approval by the Planning and Public Works Department, and shall ensure long-term viability of the street tree.</p>
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## Attachment 3: Landscaping Code Comparison

<p><b>Parking Lot Landscaping</b></p>	<p><b>Section 13.06.090 (B)(4)(g)</b>  <i>(2) Exceptions:</i></p> <ul style="list-style-type: none"> <li>➤ Parking Lot Perimeter Landscaping is not required in M-2 or PMI Districts.</li> <li>➤ Parking lots of 15 stalls or less are not required to meet Interior Planting requirements.</li> <li>➤ Parking lots of 15 stalls or less, located behind buildings and accessed by alleys, are exempt from the Site Perimeter requirement.</li> </ul> <p><i>(4) Parking Lot – Interior Planting Requirements:</i>  A mixture of trees, shrubs and groundcover that meets the standards of section 13.06.090 (B)(4)(g)(4) is required.</p> <p>b. Parking lot landscaping areas example:</p>  <p><i>(7) Parking lot - Perimeter landscaping Planting Requirements.</i>  Parking Lot Perimeters shall be planted with a mixture of trees, shrubs and groundcover meeting the requirements of section 13.06.090 (B)(4)(g)(7)</p> <p>(a) Parking Lots with more than 20 stalls are required to provide a 10-foot wide planting strip per the planting requirements below.</p>	<p><b>Section 18J.15.090</b>  <i>A. Applicability:</i></p> <ul style="list-style-type: none"> <li>➤ 1. Perimeter parking lot landscaping is required for any portion of a surface parking lot that is within 20 feet of a public or private road right-of-way or shared access.</li> <li>➤ 2. Interior parking lot landscaping is required for all new surface parking lots with 10 or more spaces.</li> <li>➤ 3. Interior parking lot landscaping is required for the addition of 10 spaces or more to an existing parking lot.</li> </ul> <p><i>D. Standards</i></p> <p><i>1. Interior Parking Lot Landscaping.</i></p> <ol style="list-style-type: none"> <li>a. Planting areas shall be fully protected by curbs, wheel stops, or other appropriate means to prevent injury to plants from pedestrian or vehicular traffic, except that minor curb cuts are allowed for sheet flow into planting areas used as stormwater facilities.</li> <li>b. A maximum of 10 parking stalls in a row shall be allowed between landscape planting islands.</li> <li>c. Landscape areas containing trees shall be a minimum of 64 square feet in size with no dimension less than 6 feet. Trees must be set back at least 24 inches from the curb edge to prevent damage from parking cars.</li> <li>d. Landscape areas containing only shrubs and groundcover shall have a minimum width of 4 feet. Shrub, hedge, and groundcover plants shall not have mature heights that exceed 36 inches to provide for ease of vehicular sight distance and pedestrian safety.</li> <li>e. Parking lots shall be located no closer to the interior lot line than the minimum width of required perimeter landscape buffer.</li> <li>f. If the calculation of the number of trees or shrubs results in a fraction of less than 0.5, the applicant can round down to the previous whole number.</li> </ol>
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## Attachment 3: Landscaping Code Comparison

	<p>(b) Where the subject property is 150 feet or less in depth, the perimeter strip can be reduced to 5 feet in width.</p> <p>(c) When applicable, a Parking Lot Perimeter is required around the shortest circumferential line defining the exterior boundary of a parking, loading or similar paved area, excluding primary structures, driveways or walkways providing access to the facility.</p> <p>Section 13.06.090 (B)(4)(g) (5) and (6) provide some standards regarding distribution and distribution flexibility bounces. (Click <a href="#">here</a> to view the code)</p>	<p>g. Native and Drought Tolerant Western Washington Plants. Refer to PCC <a href="#">18J.15.100</a>, Plant Lists, for required landscape plant selection standards. For bioretention areas within planting areas, refer to the plant list in the Pierce County Stormwater and Site Development Manual.</p> <p><i>2. Perimeter Parking Lot Landscaping:</i></p> <p>a. Any portion of the parking area within 20 feet of a public road right-of-way shall provide a Level 2 Landscape Buffer, per PCC <a href="#">18J.15.040.H.1</a>, along the right-of-way line.</p> <p>b. The perimeter street landscaping for the parking lot shall not count toward the total interior landscaping required for the parking lot.</p> <p>c. For ECOR, NCOR, TCTR, and UCOR zones, any portion of the parking area within 20 feet of a public road right-of-way shall provide a Level 1 Landscape Buffer, per PCC <a href="#">18J.15.040.H.1</a>, along the right-of-way line. Street trees provided through Title <a href="#">17B</a> PCC and PCC <a href="#">18J.15.050</a> shall be adequate to satisfy this requirement.</p> <p><i>5. Storage and Service Areas</i></p> <p>a. Service and delivery bays shall not be oriented to the street frontage.</p> <p>b. Outdoor storage facilities, garbage and recycling stations, and, when permissible, utility meters and electrical conduit, shall be screened per requirements of section <a href="#">Section 18J.15.090 (D)(5)</a> in addition to the followings:</p> <ol style="list-style-type: none"> <li>1) A structural enclosure compatible with the primary structure.</li> <li>2) A 6-foot sight obscuring fence; or</li> <li>3) An L3 Vegetative Screen.</li> </ol> <p>c. Service areas shall be setback from property lines 15 feet or the required building setback, whichever is greater, when abutting a conforming residential use. The service areas shall be</p>
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## Attachment 3: Landscaping Code Comparison

		<p>setback a minimum of 5 feet from property lines of abutting non-residential uses.</p> <p><i>E. Guidelines.</i></p> <ul style="list-style-type: none"> <li>➤ 1. Tree species should be selected based on their parking lot compatibility, that is, high branching, do not release sticky substances, deep rather than shallow rooting, etc.</li> <li>➤ 2. During the summer, interior parking lot landscaping areas should provide tree shade for 35 percent of the total parking lot area.</li> <li>➤ 3. Parking lot planting areas should be constructed to retain, infiltrate, and cleanse stormwater generated from the parking lot area as either bioretention areas or bioswales, except where soil types will not allow for such designs.</li> <li>➤ 4. Landscape areas should be distributed evenly throughout the parking area; however, clustering of landscaping is permitted to accommodate preservation of existing vegetation or specific design objectives including, but not limited to, solar access, water conservation, passive recreation, transit facilities, or architectural design.</li> <li>➤ 5. Planting of lawn in areas less than 10 feet in width is discouraged due to associated water waste.</li> <li>➤ 6. Vegetative and inert ground cover or lawn should cover all required landscape areas.</li> </ul>
<p><b>Landscaping Buffers</b></p>	<p><b>13.06.090 (J) (5) (d)</b>  Purpose: To help ensure appropriate transitions between non-residential and/or higher intensity development and adjacent residential districts.  <i>5. Landscaping Buffers</i>  <i>d. Buffer standards - More intensive district abutting an R-District property.</i></p> <p>(1) In Industrial zoning districts:</p>	<p><a href="#">Section 18J.15.040.H.3</a>  <i>3. Full Screen/Berm (Landscape Level 3 – L3):</i></p> <p>a. Full Screen/Berm, Landscape Level 3, shall include Canopy Vegetation-L3 and either a Vegetative Screen-L3 or a Berm-L3.  e. Screen Width. All required L3 vegetation shall be located adjacent to the lot line and shall have a minimum planting bed width of 20 feet, with no required vegetation located greater than 30 feet from the lot line.</p>



## Attachment 3: Landscaping Code Comparison

<ul style="list-style-type: none"> <li>• A landscape buffer of 50 feet must be provided on the property, along the boundary abutting an R-district property.</li> <li>• If a berm with a 6-foot vertical grade difference is provided on the property, the landscape buffer may be reduced to 30 feet.</li> <li>• Where the property required to provide a buffer is 300 feet or less in depth, measured perpendicularly from the residential parcel, the buffer can be reduced to 20 feet.</li> <li>• Where the property required to provide a buffer is 150 feet or less in depth, measured perpendicularly from the residential parcel, the buffer can be reduced to 15 feet.</li> </ul> <p>For more information regarding Planting requirements please see section 13.06.090(J)(5)(d)(3).</p> <p><i>e. Buffer standards – More intensive district across the street or alley from R-District property</i></p> <p>(1) A continuous planting area that has a minimum width of 7 feet shall be provided on the property, across from the R-District.</p> <p>(2) In cases where there is a demonstrated site constraint, the minimum buffer width may be reduced to a minimum 4 feet, with the integration of a continuous site-obscuring vegetated fence or wall.</p> <p>For more information regarding Planting requirements please see section 13.06.090(J)(5)(e)(3).</p>	<p>f. Installation of vegetative groundcover is encouraged but not required within the L3 planting area.</p>
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## Attachment 4: High Impact Use Comparison

Prohibited Uses within Aquifer Recharge Area: Tacoma v. Pierce County	
Tacoma	Pierce county
<p><b>Section 13.06.070 (D)(5)</b>  <i>Prohibited uses in STGPD</i></p> <ol style="list-style-type: none"> <li>1) Chemical manufacture and reprocessing.</li> <li>2) Creosote/asphalt manufacture or treatment.</li> <li>3) Electroplating activities.</li> <li>4) Manufacture of Class 1A or 1B flammable liquids as defined in the Fire Code.</li> <li>5) Petroleum and petroleum products refinery, including reprocessing.</li> <li>6) Wood products preserving.</li> <li>7) Hazardous waste treatment, storage, or disposal facilities. (“Designated Facility” per Ecology’s Chapter 173 303 WAC et seq.).</li> <li>8) Underground storage tanks</li> <li>9) Metal recycling/auto wrecking facilities</li> </ol> <p>*5.c. The above high impact uses should be periodically revised, updated, and amended, as appropriate...in order to take into account other potential high impact uses or improvements in technology, pollution control, and management.</p> <p><b>13.06.060 (E)(4) District Use table</b>  <i>Prohibited Uses in the Industrial Districts</i></p> <p>M-2 Heavy Industrial Zoning District  The following uses/activities are prohibited in the M-2 Zoning District citywide:</p> <ul style="list-style-type: none"> <li>• Mining and quarrying</li> <li>• Smelting</li> <li>• Coal facilities</li> <li>• Explosives manufacturing</li> <li>• Fertilizer manufacturing</li> </ul>	<p><b>Section 18E.50.040</b>  <i>B. Prohibited uses within aquifer recharge and wellhead protection areas:</i></p> <ol style="list-style-type: none"> <li>1) Landfills (other than inert and demolition landfills)</li> <li>2) Underground injection wells (Class I, III, and IV)</li> <li>3) Metals mining</li> <li>4) Wood treatment facilities</li> <li>5) Pesticide manufacturing</li> <li>6) Petroleum refining facilities (including distilled petroleum facilities)</li> <li>7) The storage of more than 70,000 gallons of liquid petroleum or other hazardous products</li> </ol> <p>Allowed subject to <b>hydrogeological assessment</b> and adherence to additional standards</p> <p><i>C. Agricultural activities (subject to conditions)</i></p> <p><i>D. Non-hazardous Uses</i>  Residential of 3+ units, and all commercial and industrial sites/activities that do not include or involve hazardous substance processing or handling in an aquifer recharge and/or wellhead protection area</p> <p><i>E. Hazardous Uses</i>  Hazardous substance processing or handling, hazardous waste treatment and storage facilities, animal containment areas, and solid waste facilities that require a Solid Waste Handling Permit from the TPCHD shall be allowed only in an aquifer recharge and/or wellhead protection area subject to review and approval of a hydrogeologic assessment by the TPCHD. For this Chapter, natural gas distribution systems are exempted. The TPCHD has the authority to apply whatever standards deemed necessary to mitigate any negative impacts that may be associated with the proposed development. At a minimum, the activity must employ AKART (all known, available, and reasonable treatment) to protect ground water quality.</p>

## Attachment 4: High Impact Use Comparison

<ul style="list-style-type: none"> <li>• Petrochemical manufacturing</li> <li>• Animal slaughter</li> <li>• Fat rendering</li> <li>• Acid manufacturing</li> <li>• Blast furnaces</li> </ul>	<p><i>F. Storage Tanks</i></p> <p>In addition to the requirement to submit a hydrogeologic assessment, the following standards apply to storage tanks in an aquifer recharge and/or wellhead protection area:</p> <ol style="list-style-type: none"> <li>1. <b>Underground Tanks.</b></li> <li>2. <b>Aboveground Tanks.</b></li> </ol>
	<p><b>University Place</b></p>
	<p>17.20.015.B Prohibited Uses</p> <p>1. Landfills</p> <p>Conditionally Permitted Uses, pending review of a hydrogeologic assessment and implementation of mitigation measures/guidance (see Table 1 - contains statute, regulation, guidance - WAC, RCW, etc.)</p> <ul style="list-style-type: none"> <li>-Automobile Washers</li> <li>-Chemical Treatment Storage and Disposal Facilities</li> <li>-Hazardous Waste Generators (Boat Repair Shops, Biological Research Facilities, Dry Cleaners, Furniture Stripping, Motor Vehicle Service Garages, Photographic Processing, Printing and Publishing Shops, etc.)</li> <li>-Above Ground Storage Tanks</li> <li>-Below Ground Storage Tanks</li> <li>-Injection Wells</li> <li>-Junk Yards and Salvage Yards</li> <li>-On-Site Sewage Systems (Large Scale)</li> <li>-On-Site Sewage Systems &gt; 14,500 gal/day</li> <li>-Pesticide Storage and Use</li> <li>-Sawmills</li> <li>-Solid Waste Handling and Recycling Facilities</li> <li>-Surface Mining</li> </ul> <p>2. The following uses of land shall require a hydrogeologic assessment (The hydrogeologic assessment shall include information as required by TPCHD)</p> <ol style="list-style-type: none"> <li>a. Hazardous substance processing or handling;</li> </ol>

	<ul style="list-style-type: none"> <li>b. Sludge land application sites categorized as S-3, S-4 and S-5;</li> <li>c. Animal containment areas;</li> <li>d. Wood treatment facilities</li> </ul> <p>3. The <b>hydrogeologic assessment</b> shall include information as required by TPCHD. Uses requiring a hydrogeologic assessment may be approved, conditioned or denied by the city based upon the TPCHD's evaluation of the <i>hydrogeologic assessment</i></p>
	<p><b>Lakewood</b></p>
	<p>Prohibited Uses</p> <ul style="list-style-type: none"> <li>1. Landfills, including hazardous or dangerous waste, municipal solid waste, special waste, and wood waste. Inert and demolition waste landfills may be permitted subject to the requirements of subsection D of this section.</li> <li>2. Underground injection wells, except as may be proposed by a public agency for remediation of ground water contamination or aquifer enhancement.</li> <li>3. Metals mining.</li> <li>4. New sand and gravel mining.</li> <li>5. Wood treatment facilities.</li> <li>6. Storage of more than 70,000 gallons of liquid petroleum or other hazardous substance.</li> </ul> <p>D. Regulated Activities.</p> <p>The following land uses may only be permitted after review and approval of a <b>hydrogeological assessment</b> by the Tacoma-Pierce County Health Department:</p>

## Attachment 4: High Impact Use Comparison

	<ol style="list-style-type: none"><li>1. Aboveground storage tanks (WAC 173-303-640);</li><li>2. Automobile washing facilities (Chapter 173-216 WAC, DOE Publication WQ-R-95-56);</li><li>3. Below-ground storage tanks (Chapter 173-360A WAC);</li><li>4. Residential structures housing three or more units and utilizing on-site septic systems (Chapter 246-272 WAC, TPCHD Regulations);</li><li>5. Sludge land application sites categorized as S-3, S-4 and S-5, as defined above;</li><li>6. Animal containment area (Chapters 173-216 and 173-220 WAC);</li><li>7. Inert and demolition waste landfills (Chapter 173-304 WAC);</li><li>8. Facilities with the potential to generate hazardous waste, including, but not limited to, boat repair facilities, biological research facilities, dry cleaners, furniture stripping, motor vehicle service garages, photographic processing, and printing shops (Chapter 173-303 WAC).</li></ol> <p>E. Storage Tank Permits. (underground and aboveground) (additional info)</p>
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**To:** Planning Commission  
**From:** Elliott Barnett, Planning Services Division  
**Subject:** **Home In Tacoma Project – Phase 2**  
**Memo Date:** September 27, 2023  
**Meeting Date:** October 4, 2023

**Action Requested:**

Direction on Middle Housing building design, landscaping, and parking standards

**Discussion:**

At the October 4, 2023, meeting, as part of the current focus on developing the full Home In Tacoma package, the Commission will discuss another batch of topics – introduction to building design, additional landscaping code updates, and continued discussion of parking standards. Staff and consultants will present analysis and initial recommendations on these topics and seek Commission guidance. Several background documents and a discussion outline are attached.

Following extensive community engagement and adjustments to the initial Home In Tacoma package to accommodate for state legislation, current planning efforts focus on developing the complete Home In Tacoma package, including details on zoning, standards, bonuses, and other components of the project. Once the full package is ready, the Commission will set a public hearing to gather community input.

At the September 6, 2023 meeting, the Commission discussed the zoning framework (map, housing types, densities), building scale (height, Floor Area Ratio, setbacks, building separation), use of space (parking, landscaping, amenity space), and bonuses (what bonuses to offer, public benefits to promote). Staff are using the Commission's direction and questions on these topics to further refine those components of the package. The City Council discussed the same topics at their September 26, 2023, Study Session – staff will provide a summary.

At the next meeting on October 18, 2023, the Commission will discuss the bonus program, grounded in a middle housing market feasibility study (the Commission received an advance copy of the feasibility study on September 6<sup>th</sup>). Detailed topic discussions will continue through November and December.



**Schedule:**

Staff are working on a revised schedule to allow for additional Council and stakeholder dialog prior to releasing the public hearing draft package. The tentative schedule has the public hearing being set by Planning Commission in January 2024, with Planning Commission recommendations in March 2024.



Some work items initiated under Home In Tacoma will likely move forward through the 2024 Annual Amendments or other planning processes.

**Engagement And Communications:**

Staff will conduct ongoing public engagement throughout the process and will seek regular City Council guidance as well as input from City Commissions, stakeholders, staff work group,s and community members.

Part of this engagement includes the reactivation of the Housing Equity Taskforce which holds its first meeting on September 28, 2023. This group is made up of members of the Planning Commission and Human Services Commission and is focused on anti-displacement strategies and equitable engagement around the Home In Tacoma project. This group will meet monthly for the remainder of the project period and will help inform equity efforts moving forward.

In addition, staff are meeting monthly with the Tacoma Permit Advisory Group (TPAG). The Group represents development stakeholders volunteering their expertise to advise the City on permitting and standards. The TPAG have provided extensive input to date and will continue their discussion in parallel with the Planning Commission.

**Background:**

Tacoma residents face increasing challenges in accessing housing they can afford that meets their needs. For many years, Tacoma’s housing rules for most neighborhoods have primarily allowed just one housing type – detached houses. On December 7, 2021, the City Council adopted Amended Ordinance No. 28793 approving the Home In Tacoma Project – Phase 1 package.

The Council’s action established a new housing growth vision for Tacoma supporting Missing Middle Housing options, designated Low-scale and Mid-scale Residential areas, and strengthened policies on infill design, affordability, anti-displacement, and other goals. The action also initiated Home In Tacoma – Phase 2 to implement the new policies through changes to residential zoning and standards, along with actions to promote affordability and ensure that housing supports multiple community goals. The adopted package is available at [www.cityoftacoma.org/homeintacoma](http://www.cityoftacoma.org/homeintacoma).



**Prior Council, Commission, and Taskforce Actions:**

- Housing Equity Taskforce (02/10/22, 03/10/22, 09/28/23)
- City Council Study Session (02/22/22, 12/06/22, 05/16/23, 06/20/23, 09/26/23)
- Planning Commission (06/15/22, 09/21/22, 10/19/22, 01/04/23, 02/01/23, 03/15/23, 04/19/23, 05/17/23, 06/21/23, 09/6/23)
- City Council IPS Committee (04/13/22, 05/25/22, 10/12/22, 01/25/23, 03/22/23)
- Planning Commission comments debrief (06/01/22)
- Planning Commission Public Hearing (04/20/22)
- Planning Commission initial discussion (02/02/22)

**Project Information:**

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- Project email: [homeintacoma@cityoftacoma.org](mailto:homeintacoma@cityoftacoma.org)

**Attachments:**

- Attachment 1: Discussion outline
- Attachment 2: 70% Building Design and Additional Standards
- Attachment 3: Initial Landscaping Code Updates Recommendations
- Attachment 4: Landscaping Benchmarking and Code Audit
- Attachment 5: Updated Reduced Parking Area map option

c. Peter Huffman, Director





## Planning Commission Discussion Outline

10-04-23

The City is moving closer to a complete package of draft zoning and standards for the Home In Tacoma Project. This discussion outline summarizes the topics and decisions needed for the Planning Commission's October 4, 2023 meeting.

These proposals have been informed by adopted City policy direction, state legislative direction, Planning Commission direction to date, and by themes of the public engagement efforts.

### Topics

1. Middle Housing Building Design Standards
2. Landscaping Code updates
3. Parking (Reduced Parking Area)

HIT policies call for meeting housing supply, choice and affordability goals, and for ensuring that housing development contributes to multiple goals, including compatibility with neighborhood patterns. In general, this is an exercise in balance. At the meeting, staff will facilitate a Commission discussion of balancing these goals.

This outline is intended as a decision-making guide. The discussion of each topic summarizes what we do now in relation to this topic, key policy direction/decisions to date/engagement themes, provides a summary of this proposal, and flags decisions we need to make today.

With Commission's direction, these materials will be packaged up for public review through the Commission's Public Hearing process.



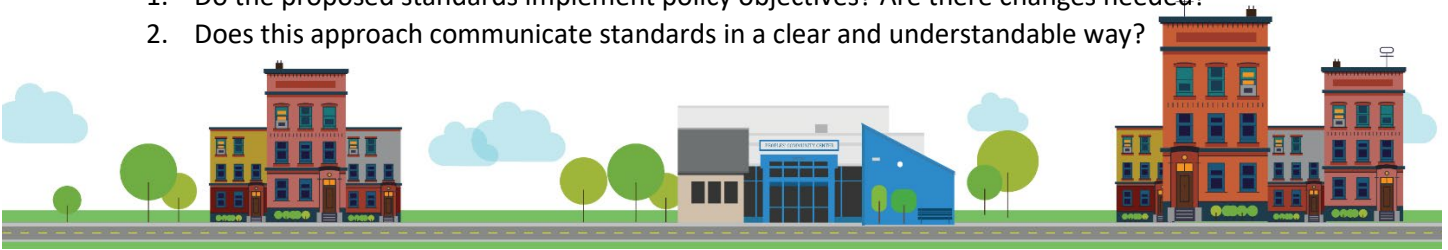
## 1. Middle Housing Building Design

### SEE 70% BUILDING DESIGN AND ADDITIONAL STANDARDS (Attachment 2)

- **What we do now**
  - Residential development is currently grouped into single-family, duplex, triplex, townhouses, multifamily, cottage housing and Accessory Dwelling Units
  - Standards for single-family are minimal, with most emphasis on denser housing types
  - Standards include such features as pedestrian orientation, façade articulation, pedestrian and vehicular access, and residential transitions
- **Policy direction/decisions to date/engagement themes**
  - Home In Tacoma (HIT) 1
    - Support a range of middle housing citywide
    - Reasonable compatibility with residential patterns (building form, scale, yards, pedestrian access), rather than architectural style
    - Evaluate how neighborhood distinctions could inform standards
    - Meet multiple goals (including housing affordability and choice, design, sustainability, accessibility, pedestrian-orientation, walkability, adaptive reuse of existing buildings)
  - City Council/Planning Commission direction to date
    - Allow middle housing through a hybrid zoning approach using density, building form and scale
    - Consistent approach citywide, rather than based on individual neighborhoods
    - Standards focus on design fundamentals (such as orientation to the street) rather than on architectural style
  - 2023 Legislative session
    - Standards must not be stricter for middle housing than single-family
  - Public engagement themes
    - Opinions vary about what makes new buildings compatible, with agreement around building scale, pedestrian orientation, trees and yard space
- **Summary of this proposal**
  - Fit standards within the new zoning framework (Urban Residential zones)
  - ***District Development standards*** for each zone provide direction on allowed housing types, lot area and measurement, density, height, setbacks, FAR and amenity space
  - ***Building Design Standards*** organized around proposed new housing types (Houseplexes, Backyard Buildings, Courtyard Housing, Rowhouses, and Multiplexes) provide direction on building placement, access and parking, building size, building articulation, and open space. Additional standards that apply generally are included in the ***Additional Building Design Standards*** section.
  - ***Site Development Standards*** provide direction on features including landscaping, parking, and utilities (for the most part not changing through this Project)

### DECISIONS NEEDED

1. Do the proposed standards implement policy objectives? Are there changes needed?
2. Does this approach communicate standards in a clear and understandable way?



## 2. Landscaping Code

### **SEE LANDSCAPING RECOMMENDATIONS REPORT (Attachment 3), and LANDSCAPING BENCHMARKING AND CODE AUDIT REPORT (Attachment 4)**

- **What we do now**

- Street trees (single-family, duplex and triplex exempt)
- Tree canopy requirement in some zones (based on small, medium and large tree size)
- Parking lot landscaping for 15 or more uncovered stalls

- **Policy direction/decisions to date/engagement themes**

- Home In Tacoma (HIT) 1
  - Support Urban Forestry goals in the streetscape and on sites (in particular, 30% tree canopy coverage goal, promote retention of mature trees)
  - Utilize landscaping elements to improve livability, enhance environmental conditions, increase compatibility and upgrade appearance
- City Council/Planning Commission direction to date
  - Trees promote multiple goals (a separate effort is underway to strengthen the City's right-of-way tree standards)
  - Promote trees AND housing through the Home In Tacoma Project
- 2023 Legislative session
  - Standards must not be stricter for middle housing than single-family
- Public engagement themes
  - Trees are very significant for neighborhood compatibility and are important for multiple policy goals (climate change, livability, public health, equity)
  - Housing developers input: Tree requirements can add cost and complexity to permitting, or in the case of tree retention can compete with housing development; standards should be clear and include flexibility/options

- **Summary of this proposal**

A package of changes intended to expand tree requirements with residential development, while streamlining the code and improving tree health and longevity

- Suggested revisions to General Landscaping Standards (General/All Zones), including
  - Tree credits approach (modifies existing tree canopy requirements)
  - Change Minimum tree planting area
  - Increase minimum soil volume requirements
  - Reduce Tree spacing requirements
- Suggested revisions in Urban Residential zones, including
  - Tree removal requirements
  - Tree planting and/or retention (amount varies by zoning district)
  - Street trees required with all residential development
- Potential future landscaping actions (citywide)
  - Establish a "Green Factor" approach to increase flexibility



- Expand changes in the Urban Residential zones to other areas

## DECISIONS NEEDED

3. Do the proposed increases in tree planting and retention requirements strike the right balance between housing and urban forestry goals?
4. Does the suggested code structure and general tree standards approach provide clarity and predictability for developers and property owners?

### 3. Parking (Reduced Parking Area)

#### SEE DRAFT REDUCED PARKING AREA MAP (Attachment 5)

#### Use of space (parking, landscaping, amenity space)

*This discussion builds on the parking conversation from the last Planning Commission meeting (09/06/23), which was part of the “use of space” discussion. Just as with the building itself, use of unbuilt space on the lot also is an exercise in balance. The proposal overall seeks to make more room for housing through parking requirement reductions, while enhancing livability through tree and amenity space standards.*

- **What we do now (on parking)**
  - Generally, 2 stalls required per single-family dwelling, 1.25 stall per multifamily dwelling, 0 stalls per Accessory Dwelling Unit, some reductions available
  - Driveways must be 10 feet wide for one unit, 20 feet for 2 or more
  - Bicycle parking required for multifamily
- **Policy direction/decisions to date/engagement themes (on parking)**
  - Home In Tacoma (HIT) 1: Promote housing goals by increasing flexibility while ensuring reasonable compatibility with residential patterns, right-size parking requirements, meet multiple goals, promote transportation choices, livable and healthy neighborhoods
  - City Council/Planning Commission direction to date: Evaluate parking reductions, promote transportation choices
  - 2023 Legislative session: Parking mandates prohibited within ½-mile of major transit stations, maximums established elsewhere; standards must not be stricter for middle housing than single-family
  - Public engagement themes: Parking is a significant factor to promoting compatibility, but can also compete with housing goals, livability, trees and other features
  - Housing developer input: Parking requirements add to cost and reduce the amount of housing that can be built
- **Summary of this proposal**
  - Proposed – number of onsite stalls: Reduce and simplify parking calculation; link to zoning districts; exempt areas near major transit, ADUs and affordable units
    - UR-1: 1 stall per dwelling
    - UR-2: 0.75 stalls per dwelling
    - UR-3: 0.5 stalls per dwelling



- Reduced Parking Area (1/2-mile from major transit): None required
- Accessory Dwelling Units: None required
- Affordable housing units (through bonus): None required
- Proposed – bicycle parking
  - Evaluate requiring more bicycle parking as we move up in zoning districts (current is 1 long-term bike stall per unit, 1 short-term per 20 units)
  - Proposed – driveways: Reduce required width while ensuring safety and functionality

#### DECISIONS NEEDED

5. Should the city reduce parking, adjust driveway widths and clarify bike parking standards as proposed?
6. Should areas within ½ mile of Tacoma’s highest capacity transit (Pierce Transit routes 1 and 2) be added to the Reduced Parking Area (which has no parking requirements except for accessible spaces)?

#### OVERALL DECISION

7. Should other modifications be made to the package as currently drafted?







# Attachment 2

City of Tacoma

**Urban Residential Districts**

# **Building Design Standards**

70% Draft Preview  
September 27, 2023

## Quick Guide for Tacoma Middle Housing Code

### Steps

### Tacoma Title 13 Land Use Regulatory Code

Find the  
**Residential District**  
zone for your parcel

#### Chapter 13.06 Zoning

#### 13.06.020 Urban Residential Districts

##### C. Districts Established

UR-1 (Urban Residential 1)  
UR-2 (Urban Residential 2)  
UR-3 (Urban Residential 3)

##### E. District Use Restrictions

Find and comply  
with the  
**District Development  
Standards**  
specific to your Residential  
District Zone

##### F. District Development Standards

1. Housing Types
2. Lot Area & Measurements
3. Density
4. Height Limits and Number of Stories
5. Setbacks
6. Floor Area Ratio (FAR)
7. Amenity Space

Select and comply with the  
**Building Design Standards**  
specific to your building  
type

#### 13.06.100 Building Design Standards

##### E. Urban Residential District Design Standards

1. Applicability
2. Overview
3. Housing Types
  - a. Houseplex
  - b. Backyard Building
  - c. Courtyard Housing
  - d. Rowhouse
  - e. Multiplex
4. Additional Standards (applicable to most Housing Types)

Find and comply with the  
**Site Development  
Standards**  
for your district

#### 13.06.90 Site Development Standards

- B. Landscaping standards
- C. Off-street parking areas
- D. Loading spaces
- E. Storage areas and vehicle storage areas
- F. Pedestrian and bicycle support standards
- J. Residential transition standards
- L. Utilities
- M. Street Level Building Transitions

**13.06.100.E. Urban Residential District Design**

1. Applicability . . . . . 4

2. Overview . . . . . 4

    2.a. Description . . . . . 4

    2.b. Summary of the Housing Types . . . . . 5

    2.c. Housing Types Key . . . . . 5

3. Housing Types . . . . . 6

    3.a. House, Duplex, Triplex, 4-plex, 5-plex, 6-plex (Houseplex) . . . . . 6

    3.b. Backyard Building . . . . . 8

    3.c. Courtyard Housing . . . . . 10

    3.d. Rowhouse . . . . . 12

    3.e. Multiplex . . . . . 14

4. Additional Standards . . . . . 16

## E. Urban Residential District Design Standards

### 1. Applicability

- a. The following Housing Type and Additional Standards (together, creating the Building Design Standards) apply to all buildings within Urban Residential districts. Other standards apply when these same Housing Types are built within other districts in the City, including those in R-4 and R-5 districts.
- b. These Design Standards work together with the other code sections to regulate buildings, open space, trees, parking and other elements on a site. Standards in one section are not repeated in another section. Refer to the following sections for other standards applicable to lots within the Urban Residential Districts:
  - TMC 13.06.020.F. District Development Standards and Table: Housing Types allowed, Uses permitted, Lot area & measurements, Density, Floor Area Ratio, Maximum height, Number of stories, Setbacks, Building separation, Floor area ratio, Amenity space.
  - TMC 13.06.090 Site Development Standards: Landscaping standards, Off-street parking areas, Pedestrian and bicycle support standards, Fences and retaining walls, Utilities, Street level building transitions.
- c. Refer to TMC 13.07 (Landmarks and Historic Special Review Districts) for applicable standards for entries and other building elements in Historic Districts. When conflicts in the code exist, Historic Standards take priority over Building Design Standards.
- d. When applying for a permit, the applicant must indicate which Housing Type is being proposed, and must comply with Building Design Standards for that type.
- e. Multiple buildings and different Housing Types may be combined on a site, especially on large sites. These are often, but not always, platted for separate ownership. Backyard Buildings, by definition, are anticipated behind many of the other Housing Types. When combining Housing Types on a site, the applicable Housing Standards will be applied individually to each portion of the site as appropriate and indicated on the permit application. In no case shall the maximum density standards for a site be exceeded.

### 2. Overview

- a. Description  
Walkable, vibrant, inclusive and healthy residential neighborhoods are often made up of a variety of “Middle Housing” types that provide different building, yard and dwelling unit configurations to meet a variety of living preferences, family sizes and budgets. Middle Housing neighborhoods can also promote pedestrian access, compatibility with existing residential neighborhoods, building orientation to the street, and minimize the impacts of vehicular access.

These Building Design Standards for the Urban Residential districts illustrate a number of Housing Types to provide both the predictability and variety of successful Middle Housing neighborhoods.

b. Summary of the Housing Types

*House, Duplex, Triplex, 4-plex, 5-plex, 6-plex (Houseplex)*

A single building containing 1 to 6 units, which may be in a “side-by-side” or “stacked” configuration. At least one private or shared entry is required from the street, and a private or shared yard is often included behind the building. Townhouse-style buildings where at least some units are oriented perpendicular to the street and where vehicular and/or pedestrian access is provided from a shared facility along the side (often called “slot homes”) are included in this type.

*Backyard Building*

A building located behind another structure at the rear of a lot. The building may contain a garage. The building may be accessed from a shared or private path from the front sidewalk or from a secondary street on a corner lot. A small yard and parking space can be included. This housing type can include detached accessory dwelling units (DADU), but also includes any structure containing no more than six units.

*Courtyard Housing*

A group of buildings or units arranged around a shared courtyard. Depending on the zone, units may be detached or attached. The courtyard is entered from the street, provides pedestrian access to the units, and is a shared social space which takes the place of private back yards. Detached buildings within Courtyard Housing developments may include up to six dwelling units per building.

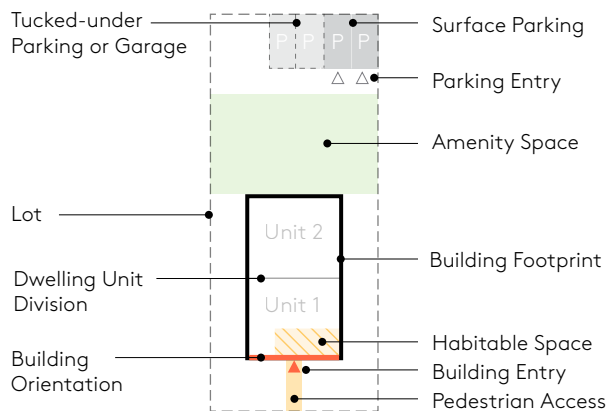
*Rowhouse*

Typically a multi-story building with access to the street from its front door and a private yard. Each Rowhouse may contain more than one unit accessed from the same sidewalk and front door. A Rowhouse is always attached to two to five other Rowhouse buildings, which together create a “Rowhouse Cluster” of 3 to 6 Rowhouses.

*Multiplex*

A building consisting of 7 or more stacked units, with the appearance of a large house or a small apartment building. Access is often from one shared entry at the street leading to a central corridor accessing all units, but other configurations are possible (including a few single-stair buildings connected together).

c. Housing Types Key





### 3.a. House, Duplex, Triplex, 4-plex, 5-plex, 6-plex (Houseplex)

#### 1. Description

A single building containing 1 to 6 units, which may be in a “side-by-side” or “stacked” configuration. At least one private or shared entry is required from the street, and a private or shared yard is often included behind the building. Townhouse-style buildings where at least some units are oriented perpendicular to the street and where vehicular and/or pedestrian access is provided from a shared facility along the side (often called “slot homes”) are included in this type.

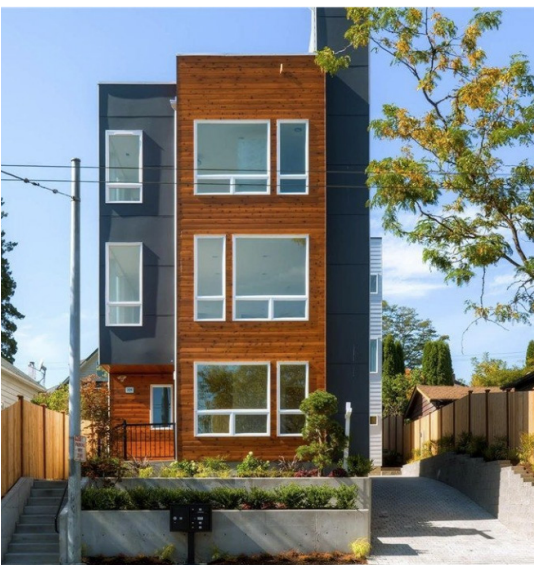
#### 2. Applicability

The following requirements apply to all Houseplex dwellings in all Urban Residential districts, as well as to new units added to or built within existing houses. The total number of units per lot is subject to District Development Standards density maximums.

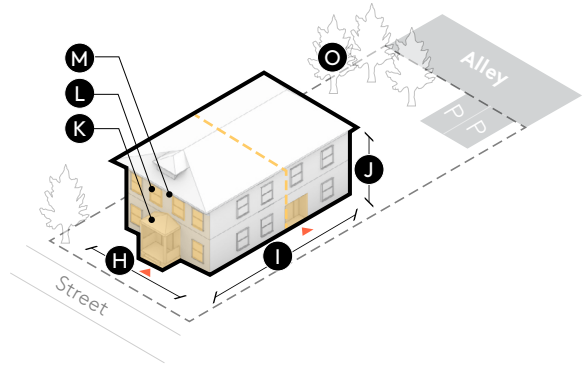
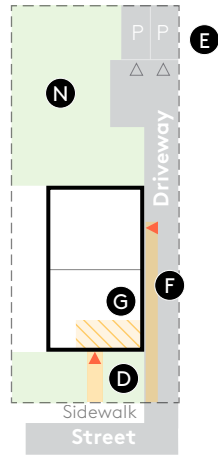
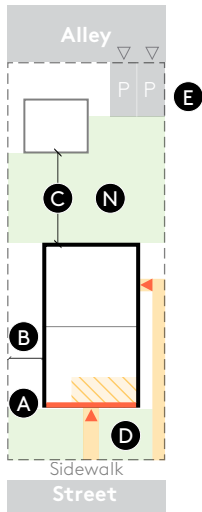
#### 3. Purpose

Reserved for text by City.

Character examples for Houseplexes



# House, Duplex, Triplex, 4-plex, 5-plex, 6-plex (Houseplex) Design Standards



## 4. Building Placement

<b>A</b> Building Orientation*	Must have primary orientation to street; Corner buildings may orient to two streets.
<b>B</b> Setbacks	Refer to District Standards <i>TMC 13.06.020.F</i> .
<b>C</b> Separation Between Buildings On Same Site	10' 6' if building height of both buildings is less than 25'

## 5. Access and Parking

<b>D</b> Pedestrian Access*	Primary Entry: One entry required at primary street. Additional Entries: Allowed from street, side yard or rear yard. Sidewalks or pedestrian path required from the street.
<b>E</b> Parking	Required access from an alley if exists. Prohibited between building and street. Prohibited within front setback (except in front of garages). Garages must be setback 20' from lot line. Refer to Site Development Standards <i>TMC 13.06.090.C</i> for vehicle and <i>TMC 13.06.090.G</i> for bike parking ratios.
<b>F</b> Driveway	Max number: 1 per 12,000 SF of lot area. Limited to access from alley if exists. Refer to Site Development Standards <i>TMC 13.06.090.C</i> .
<b>G</b> Habitable Space*	10' deep along 75% of street-facing facades and 80% of street-facing lot frontages.

## 6. Building Size

<b>H</b> Building Width	UR-1 and UR-2: 50' max UR-3: 75' max
<b>I</b> Building Depth	UR-1 and UR-2: 70' max UR-3: 90'
<b>J</b> Height Limits	Refer to District Standards <i>TMC 13.06.020.F</i> .

## 7. Building Articulation

<b>K</b> Covered Entry*	Covered entries required: 3' deep min. Single unit entry: 20 SF min Shared entry: 30 SF min
<b>L</b> Transparency / Windows & Openings*	15% transparent to street; 10% transparent to alleys, shared open space, and surface parking courts
<b>M</b> Articulation*	Street-facing facades may be articulated to look like a single dwelling or to emphasize distinct dwelling units: One feature required for facades over 40' wide. Two features required for facades over 60' wide.

## 8. Open Space

<b>N</b> Amenity Space*	Private, common or mix.
<b>O</b> Tree Credit	Refer to District Standards <i>TMC 13.06.020.F</i> .

\* Refer also to Additional Standards *TMC 13.06.100.E.4* at the end of this chapter.



## 3.b. Backyard Building

### 1. Description

A building located behind another structure at the rear of a lot. The building may contain a garage. The building may be accessed from a shared or private path from the front sidewalk or from a secondary street on a corner lot. A small yard and parking space can be included. This housing type can include detached accessory dwelling units (DADU), but also includes any structure containing no more than six units.

### 2. Applicability

The following standards apply to all Backyard Buildings in all Urban Residential districts. The total number of units per lot is subject to District Development Standards density maximums.

### 3. Purpose

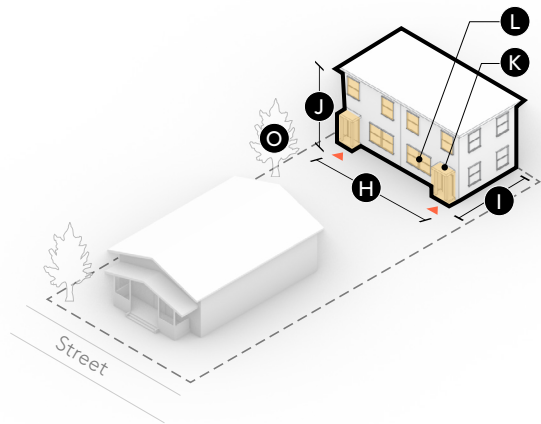
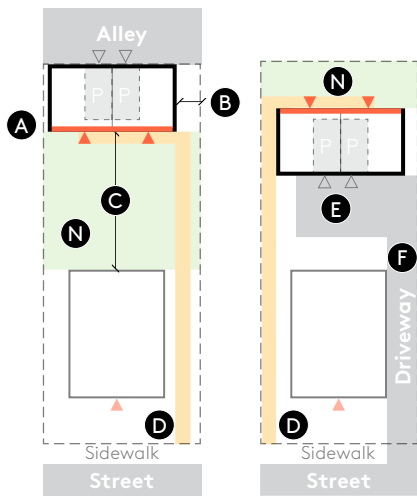
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Character examples for Backyard Buildings





# Backyard Building Design Standards



## 4. Building Placement

- A Building Orientation\*** May orient to a backyard, alley, or a street on a corner lot based on site conditions.
- B Setbacks** 0' rear setback from alley. Refer to District Standards *TMC 13.06.020.F.*
- C Separation Between Buildings On Same Site** 10'  
6' if building height of both buildings is less than 25'

## 5. Access and Parking

- D Pedestrian Access\*** Sidewalk or pedestrian path required from street.  
  
Limited to access from an alley or existing driveway if exists. Prohibited between building and street. Prohibited within front setback. Garages must be setback 20' from lot line. Refer to *Site Development Standards TMC 13.06.090.C* for vehicle and *TMC 13.06.090.G* for bike parking ratios.
- E Parking**
- F Driveway** Max number: 1 per 12,000 SF of lot area shared with street-facing buildings. Required to be shared with driveways serving street-facing buildings, or must occur from alley if one exists. Refer to *Site Development Standards TMC 13.06.090.C.*
- G Habitable Space\*** N/A

## 6. Building Size

- H Building Width** UR-1 and UR-2: 40' max  
UR-3: 75' max
- I Building Depth** 40' max
- J Height Limits** Refer to District Standards *TMC 13.06.020.F.*

## 7. Building Articulation

- K Covered Entry\*** Covered entries required:  
3' deep min  
Single unit entry: 20 SF min  
Shared entry: 30 SF min
- L Transparency / Windows & Openings\*** 15% transparent to street if one exists.  
10% transparent to alleys.  
Placement should endeavor to provide privacy from adjacent units.
- M Articulation\*** N/A

## 8. Open Space

- N Amenity Space\*** Private, common or mix.
- O Tree Credit** Refer to District Standards *TMC 13.06.020.F.*

\* Refer also to *Additional Standards TMC 13.06.100.E.4* at the end of this chapter.

### 3.c. Courtyard Housing

#### 1. Description

A group of buildings or units arranged around a shared courtyard. Depending on the zone, units may be detached or attached. The courtyard is entered from the street, provides pedestrian access to the units, and is a shared social space which takes the place of private back yards. Detached buildings within Courtyard Housing developments may include up to six dwelling units per building.

#### 2. Applicability

The following standards apply to Courtyard Housing developments in all Urban Residential districts where allowed. The total number of units per lot is subject to District Development Standards density maximums.

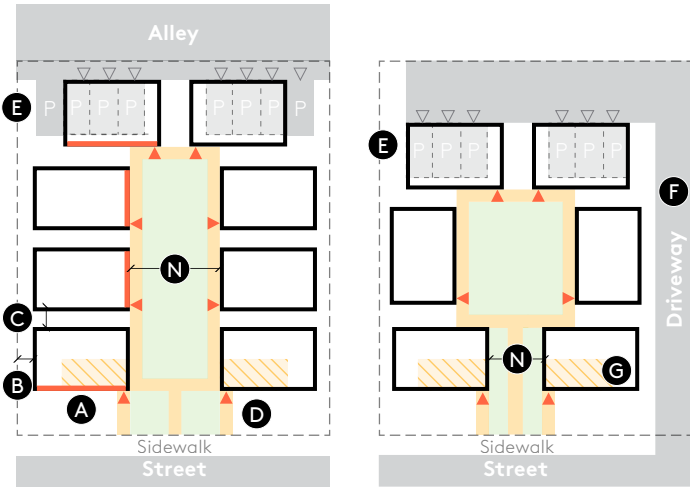
#### 3. Purpose

Reserved for text by City.

Character examples for Courtyard Housing



# Courtyard Housing Design Standards



## 4. Building Placement

<b>A</b> Building Orientation*	Buildings along a street must have primary orientation to the street. Internal buildings must orient to courtyard.
<b>B</b> Setbacks	0' Rear Setback from alley when parking is provided directly from alley. Refer to District Standards <i>TMC 13.06.020.F</i> .
<b>C</b> Separation Between Buildings On Same Site	10' 6' if building height of both buildings is less than 25'

## 5. Access and Parking

<b>D</b> Pedestrian Access*	Entry from common courtyard to each building and/or unit; Entry from street ok at front units.
<b>E</b> Parking	Required access from an alley if exists. Prohibited between building and street. Prohibited within front setback. Garages must be setback 20' from lot line. Refer to Site Development Standards <i>TMC 13.06.090.C</i> for vehicle and <i>TMC 13.06.090.G</i> for bike parking ratios.
<b>F</b> Driveway	Max number: 1 per 12,000 SF of lot area. Limited to access from alley if exists. Refer to Site Development Standards <i>TMC 13.06.090.C</i> .
<b>G</b> Habitable Space*	10' deep along 100% of street-facing facades and 80% of street-facing lot frontages.

## 6. Building Size

<b>H</b> Building Width	40' max for a detached building or the wing of an attached building
<b>I</b> Building Depth	N/A
<b>J</b> Height Limits	Refer to District Standards <i>TMC 13.06.020.F</i> .

## 7. Building Articulation

<b>K</b> Covered Entry*	Covered entries required: 3' deep min Single unit entry: 20 SF min Shared entry: 30 SF min
<b>L</b> Transparency / Windows & Openings*	15% transparent to street and courtyard. 10% transparent to alleys and surface parking lots.
<b>M</b> Articulation*	N/A

## 8. Open Space

<b>N</b> Amenity Space*	Shared courtyard required. Min width: 20'
<b>O</b> Tree Credit	Refer to District Standards <i>TMC 13.06.020.F</i> .

\* Refer also to Additional Standards *TMC 13.06.100.E.4* at the end of this chapter.



### 3.d. Rowhouse

#### 1. Description

Typically a multi-story building with access to the street from its front door and a private yard. Each Rowhouse may contain more than one unit accessed from the same sidewalk and front door. A Rowhouse is always attached to two to five other Rowhouse buildings, which together create a “Rowhouse Cluster” of 3 to 6 Rowhouses.

#### 2. Applicability

The following requirements apply to all Rowhouse dwellings in all Urban Residential districts. The total number of units per lot is subject to District Development Standards density maximums.

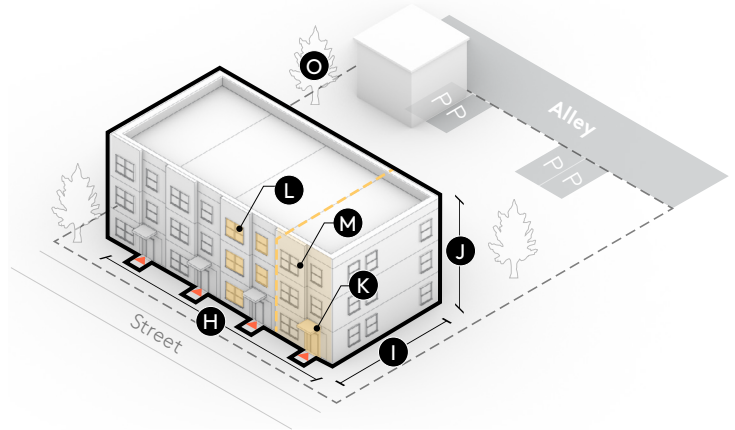
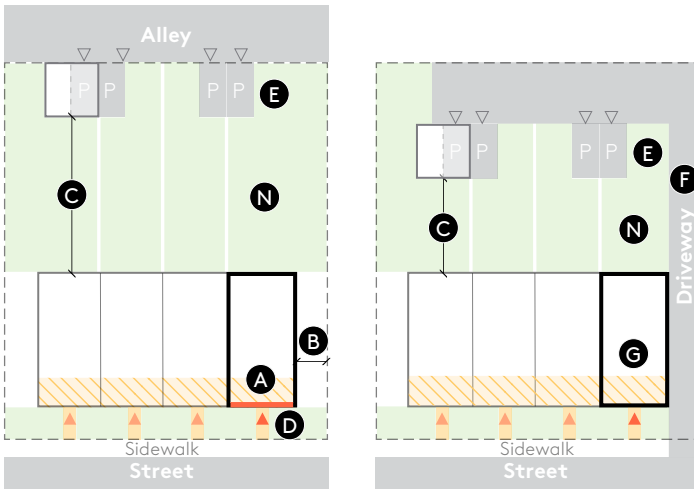
#### 3. Purpose

Reserved for text by City.

Character examples for Rowhouses



# Rowhouse Design Standards



## 4. Building Placement

- A Building Orientation\*** Must have primary orientation to street; Rowhouse Clusters on corner lots may choose to orient to two streets.
- B Setbacks** Refer to District Standards *TMC 13.06.020.F*, which measure to Rowhouse Clusters.
- C Separation Between Buildings On Same Site** 0' between Rowhouses  
10' between each Rowhouse Cluster  
6' if building height of both buildings is less than 25'

## 5. Access and Parking

- D Pedestrian Access\*** Individual access via a sidewalk or pedestrian path is required to each Rowhouse from the street. Rowhouses on corner lots may select which street to orient to.
- E Parking** Required access from an alley if exists. Prohibited between building and street. Prohibited within front setback. Garages prohibited on front facades. Garages must be setback 20' from lot line. Refer to Site Development Standards *TMC 13.06.090.C* for vehicle and *TMC 13.06.090.G* for bike parking ratios.
- F Driveway** Max number: 1 per 12,000 SF of lot area. Rowhouse Clusters must share a driveway if parking from alley is not available. Limited to access from alley if exists. Refer to Site Development Standards *TMC 13.06.090.C*.
- G Habitable Space\*** 10' deep along 100% of street-facing facades and 80% of street-facing lot frontages.

## 6. Building Size

- H Building Width** UR-1 and UR-2: 75' max, 40' min (for each Rowhouse Cluster)  
UR-3: 90' max, 40' min (for each Rowhouse Cluster)
- I Building Depth** UR-1 and UR-2: 60'  
UR-3: 80'
- J Height Limits** Refer to District Standards *TMC 13.06.020.F*.

## 7. Building Articulation

- K Covered Entry\*** Covered entries required:  
3' deep min  
Single unit entry: 20 SF min  
Shared entry: 30 SF min
- L Transparency / Windows & Openings\*** 15% transparent to streets, 10% transparent to alleys, shared open space, and parking drives or lots
- M Articulation\*** Street-facing facades must be articulated to emphasize each individual Rowhouse using at least one Articulation Feature.

## 8. Open Space

- N Amenity Space\*** Private. Common open space of the same area is allowed.
- O Tree Credit** Refer to District Standards *TMC 13.06.020.F*.

\* Refer also to Additional Standards *TMC 13.06.100.E.4* at the end of this chapter.



### 3.e. Multiplex

#### 1. Description

A building consisting of 7 or more stacked units, with the appearance of a large house or a small apartment building. Access is often from one shared entry at the street leading to a central corridor accessing all units, but other configurations are possible (including a few single-stair buildings connected together).

#### 2. Applicability

The following standards apply to Multiplex developments in all Urban Residential district. The total number of units per lot is subject to District Development Standards density maximums. Refer to Tacoma Municipal Code Section 13.06.100 C. for multi-family developments in other zones.

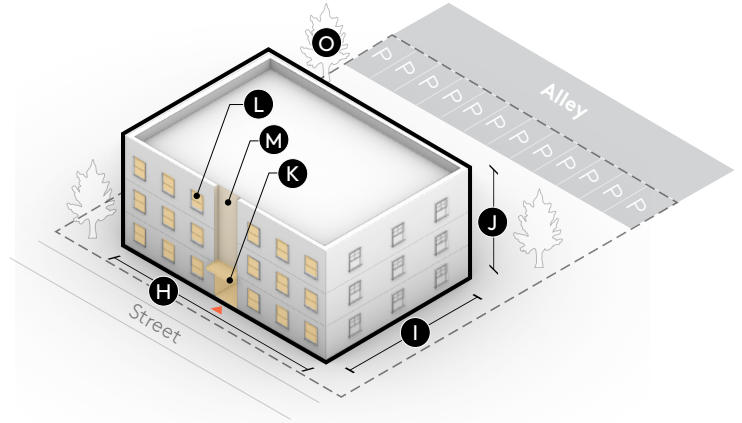
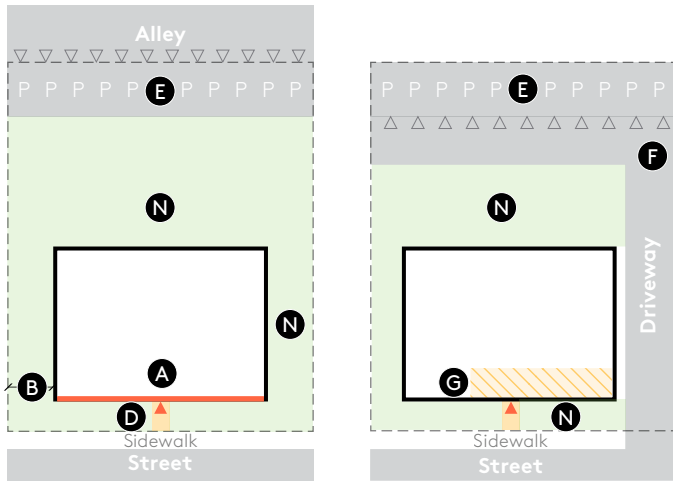
#### 3. Purpose

Reserved for text by City.

Character examples for Multiplexes



## Multiplex Design Standards



### 4. Building Placement

- A Building Orientation\*** Must have primary orientation to street.
- B Setbacks** Refer to District Standards *TMC 13.06.020.F.*
- C Separation Between Buildings On Same Site** 10'  
6' if building height of both buildings is less than 25'

### 5. Access and Parking

- D Pedestrian Access\*** At least one shared entry to the building is required from the street within 15' of the sidewalk. Individual entries to ground floor units are permitted.
- E Parking** Required access from an alley if exists. Prohibited between building and street. Prohibited within front setback. Garages must be setback 20' from lot line. Refer to Site Development Standards *TMC 13.06.090.C for vehicle and TMC 13.06.090.G for bike parking ratios.*
- F Driveway** Max number: 1 per 12,000 SF of lot area. Limited to access from alley if exists. Refer to Site Development Standards *TMC 13.06.090.C.*
- G Habitable Space\*** 10' deep along 75% of street-facing facades and 80% of street-facing lot frontages.

### 6. Building Size

- H Building Width** 90' max
- I Building Depth** 100' max
- J Height limits** Refer to District Standards *TMC 13.06.020.F.*

### 7. Building Articulation

- K Covered Entry\*** Covered entries required:  
3' deep min  
Single unit entry: 20 SF min  
Shared entry: 30 SF min
- L Transparency / Windows & Openings\*** 15% transparent to street, 10% transparent to alleys, shared open space, and surface parking lots.
- M Articulation\*** Required for street facing facades:  
One feature for facades up to 60' wide. Two features for facades over 60' wide.

### 8. Open Space

- N Amenity Space\*** Private amenity space may count for no more than 25% of total required.
- O Tree Credit** Refer to District Standards *TMC 13.06.020.F.*

\* Refer also to Additional Standards *TMC 13.06.100.E.4* at the end of this chapter.

## **4. Additional Building Design Standards**

Summary of the Additional Building Design Standards

- a. Building Orientation
- b. Habitable Space
- c. Articulation Features
- d. Transparency / Windows & Openings
- e. Prohibited Materials
- f. Covered Entries
- g. Amenity Space
- h. Non-Residential Use
- i. Corner Sites
- j. Large Sites
- k. Fencing and Walls
- l. Utilities
- m. Mechanical Screening
- n. Pedestrian Access



### a. Building Orientation

1. A building shall have a front elevation with a primary entrance oriented to the adjacent street, right of way, or other space required by the Housing Type. Front setbacks are calculated to this front elevation, and Building Width is measured along this elevation. Refer to Habitable Space requirements required at the primary building elevation.

2. Other building entries are allowed on other building facades in addition to the required entry on the front elevation.

3. This front elevation and all street-facing facades shall not contain elements commonly associated with a rear elevation appearance, such as utility meters, refuse containers, loading docks, and/or dumpsters.

### b. Habitable Space

1. Purpose: To promote active, welcoming, neighborly activities along streets and sidewalks.

2. Spaces:

- Includes residential spaces such as foyers, entries, living rooms, dining rooms, kitchens, bedrooms, dens, home offices, lobbies, mailrooms, common amenity spaces, playrooms, mudrooms and laundry rooms. Includes non-residential spaces such as cafes or commercial spaces, except garages, loading and services spaces associated with those uses.
- Excludes utility spaces such as garages, storage spaces, loading, or utility rooms.

3. Location: The floor of a Habitable Space must be within 5 feet of sidewalk grade elevation, unless site conditions prohibit such a relationship.

- Purpose: To allow garages or other utility spaces to be located partially underground along the street-frontage without counting against the Habitable Space requirements.

### c. Articulation Features

1. Applicability. As required in Building Design Standards for Houseplexes, Rowhouses and Multiplexes.

2. Articulation Features. These may combined:

- Brick used as the cladding material on a majority of the façade. Brick must be standard sized bricks, approximately 3 5/8" thick. "Thin brick", which is often less than 1" thick, does not meet this requirement.
- Windows recessed at least 2.5 inches from the cladding material, or windows with decorative window trim or deep metal "flashing" surrounds.
- Repeated balconies or bay windows.
- Vertical building modulation with a depth of 2 feet. Must be at least 4 feet wide if repeated as in Rowhouses.
- Roofline modulation.
- Articulating a building's base to contrast and complement its upper levels, including: distinctive window configurations and cladding material, or a change of plane at least 2 feet deep.
- Articulating a building's top to contrast and complement its lower levels, including: distinctive sloped roof, strong cornice line, expressive roof overhang, distinctive window configurations and cladding material on the upper floor, and/or upper level setbacks (provided the top of the building is visible from the centerline of the adjacent street).
- Change of cladding material. (Counts as 0.5 articulation features)
- Repeated distinctive window patterns. (Counts as 0.5 articulation features)
- Repeated stoops at least 36" above sidewalk grade to individual units, especially in Rowhouses.

### d. Transparency / Windows & Openings

1. Vertical façade surfaces facing a street, alley, courtyard, plaza, drive aisle, parking court, or surface parking lot shall incorporate transparent doors and windows equal to the amount required by the Housing Type. Rough openings are used to calculate this requirement. Windows in garage doors or walls do count toward meeting this standard.

2. Unscreened, flat, blank walls on the first story more than 25 feet in width are prohibited facing a public street and/or highway right-of-way, residential zone, or parking lot. These walls shall use modulation, windows, openings, landscaping to achieve the required visual break. The visual break shall be at least 1 foot in width. Items provided for other requirements may satisfy this requirement as appropriate. Stored merchandise, pipes, conduit, utility boxes, air vents, and/or similar equipment do not count toward this requirement.

3. Placement of windows on facades facing neighboring buildings, or units or buildings on the same lot, shall endeavor to create appropriate levels of privacy between neighbors.

#### e. Prohibited Materials

1. Plywood and other similar sheet siding materials, such as T1-11 siding, shall not be used for street-facing facades, except that board and batten siding shall be allowed for façade variation up to 40 percent of the front façade facing the street.

#### f. Covered Entries

1. Applicability: Covered entries are required for primary entries to buildings and units. They are not required for additional entries such as side doors or back doors.

2. May include: porches, canopies, alcoves beneath upper story overhangs, and other elements or combinations that protect pedestrians from the weather.

3. May be included as part of Amenity Space requirement.

4. Awnings made of canvas or non-permanent construction do not count towards meeting this requirement.

4. Refer to TMC 13.05.040 for porch requirements in Historic Districts.

#### g. Amenity Space

1. Private Amenity Space: This includes ground-related spaces such as yards, patios, gardens, and decks. Requirements include the following:

- No dimension shall be less than 10 feet.
- Must be directly accessible from the dwelling unit.
- May also be provided as balconies or porches of at least 50 SF, and no dimension less than 5 feet.

2. Common Amenity Space: This includes ground-related spaces such as yards, patios, courtyards, decks, community gardens, children's play areas, or other multi-purpose outdoor recreational and/or green spaces. Requirements include the following:

- No dimension shall be less than 15 feet.
- Must be positioned near a shared path, shared building entry, or other pedestrian activity.
- Must feature paths, appropriate hard surfacing, landscaping, seating, lighting and other pedestrian amenities to make the area functional and enjoyable.
- Should be oriented to receive direct sunlight for part of the day, facing east, west, or (preferably) south, when possible.
- Must be open to the sky, except a maximum of 25% of the common amenity space may be covered but not enclosed by porches, gazebos, pergolas, or other such structures, provided no dimension is less than 8 feet.

3. Rooftop decks may be used to meet up to 50% of the Amenity Space requirements if they include the same minimum dimensions and amenities required of ground-related amenity space.

4. Landscaping: Up to 35% of the amenity space may be comprised of landscaping. Refer to Landscaping Standards *TMC 13.06.090.B.*

5. Vehicular access areas shall not count as amenity space.

## h. Non-Residential Use

1. Applicability: Refer to District Standards *TMC 13.06.020.F* for uses allowed per zone. Non-residential uses except garages, loading and utility spaces count towards "Habitable Space Requirements".
2. Location:
  - Must be on ground level, and include a front entry within 2' of sidewalk grade elevation.
  - Commercial uses must be on a corner lot
  - Must be in street-facing building and in a street-facing space within the building.
3. Area and number:
  - Maximum area of 3,000 SF.
  - No limit to number of businesses.
4. Setbacks: Comply with District Standards, except commercial uses have 0' front setback min, and 10' front setback max.
5. Transparency: 25% min transparent facade between 2-10' above sidewalk grade.

## i. Corner Sites

1. Applicable to sites with two or more street frontages. On non-alley sites, an applicant may choose which street to use as the primary street for the purposes of determining Building Orientation, and Building Width and Depth.
2. Garages are only allowed within the rear portion of corner lot, at least 70' from the front property line, unless directed otherwise by City engineer..
3. Backyard Buildings and Courtyard Housing on corner lots must have primary or secondary pedestrian entries accessed from the secondary street. Secondary pedestrian entries are also encouraged in other Housing Hypes.
4. Standards for Windows & Openings apply to both street-facing facades on corner lots.

## j. Large Sites

1. Applicable to sites 60,000 SF or larger
2. Connectivity: Must meet the connectivity standards in *TMC 13.06.090.F*. Pedestrian and Bicycle support standards.
3. Standards: Large Sites must comply with District Standards, Building Design Standards, and Site Design Standards, with the following exceptions:
  - When complying with Housing Type Building Design Standards for 4. Building Placement and 5. Access & Parking, the following connections may be used in place of Streets:
    - Though-Block Connections
    - Interior Access Roads
    - Walkways, Pathways
    - Pedestrian Connections 10' or wider
  - Backyard Buildings: One row of Backyard Buildings is allowed behind each street-fronting Houseplexes, Rowhouses or Multiplexes.
4. Nonconforming large sites permitted before (March 2024) may allow renovations and additions to existing buildings.

## k. Fencing and Walls

1. Dimensions:
  - At street property line. Fences, free-standing walls are allowed up to 4 feet in height above sidewalk grade. Exceptions for decorative fences are as follows:
    - Up to 5 feet in height provided the fence or wall is semi-transparent or includes decorative features, and features a planting strip at least 1 foot wide.
    - Up to 7 feet in height provided the fence or wall is at least 50% transparent above 5 feet, and features a planting strip at least 2 feet wide planted with shrubs or groundcover.
2. Materials:
  - Barbed or razor wire: The use of barbed or razor wire is limited to those areas not visible to a public street or to an adjacent residential use.

- Chain link: Chain link is prohibited between the front of a building and a public street, except for wetland preservation and recreation uses.
- Electrified: The use of electrified fencing is prohibited in all districts.

## **l. Utilities**

1. Utility meters, electrical conduit, and other service utility apparatus shall be located and/or designed to minimize their visibility from the street. If such elements are mounted in a location visible from the street, common open space, or shared auto courtyards, they shall be screened with vegetation or by architectural features.

2. Service, loading, and garbage areas:

- Refuse, disposal and other service elements shall be provided with a designated area along the alley, where available. Such elements shall not be located along the street frontage.
- Where there is no alley available, service elements shall be located to minimize the negative visual, noise, odor, and physical impacts and shall be screened from view from the street and sidewalk.
- The City may require a consolidated location for storage of solid waste containers, direct street access pickup, or a shared waste collection service if necessary for efficient solid waste collection.

## **m. Mechanical Screening**

1. Rooftop and other mechanical equipment shall be screened from view from the centerline of adjacent streets.

## **n. Pedestrian Access**

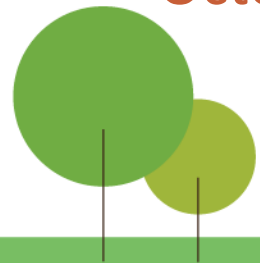
Pedestrian Paths or other paved pedestrian areas must be provided in the following minimum widths within lot boundaries based on their access to certain elements, as follows:

- 5 feet wide to more than 4 units
- 4 feet wide to 1 to 4 units
- 3 feet wide to Accessory Dwelling Units

# Affordable Housing

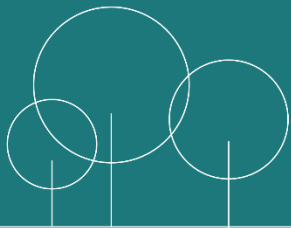
*Home In Tacoma Project  
Landscaping Code Update*

October 4, 2023



# INITIAL LANDSCAPING RECOMMENDATIONS

Part of the Home in Tacoma project, these recommendations were developed by Mithun in a collaborative effort with updates to Tacoma’s Urban Residential zoning and standards to promote Middle Housing development **and** tree canopy based on public priorities.



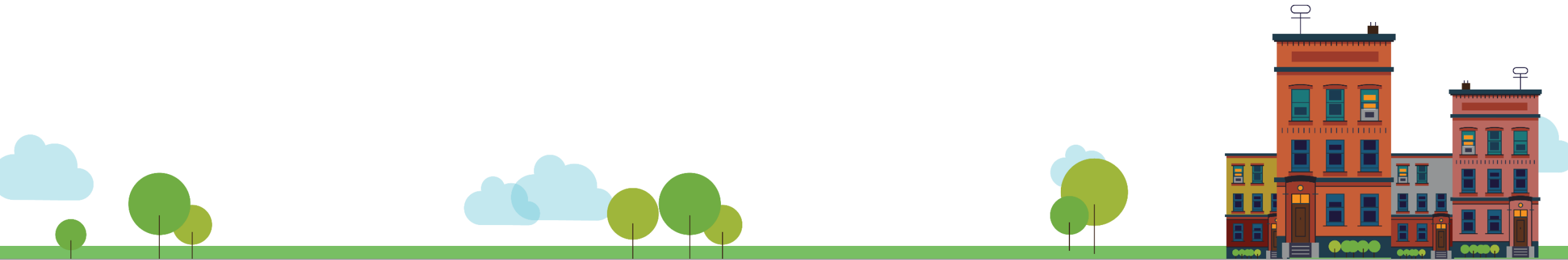
# Trees + Development

**Tacoma's adopted 30% tree canopy goal, as well as public input, has expressed the importance of trees.**

But addressing the housing crisis in tandem with a changing climate of more summer heat and winter rainfall requires allowing both development **AND** tree growth, rather than preferencing one at the expense of the other. These recommendations aim to support both, while enhancing ease of use and flexibility of Tacoma's code.

**There are some tradeoffs**, such as staffing and cost implications, and development limitations resulting from retention of existing trees. The flexibility and predictability offered by a Green Factor approach can address some of the tradeoffs more effectively but would need to be explored Citywide, outside of Home in Tacoma.

**How can we move forward to achieve this balance?** Ongoing consultation with the developer industry, general public, Council and decision makers, and public utilities will continue to inform landscaping code recommendations.



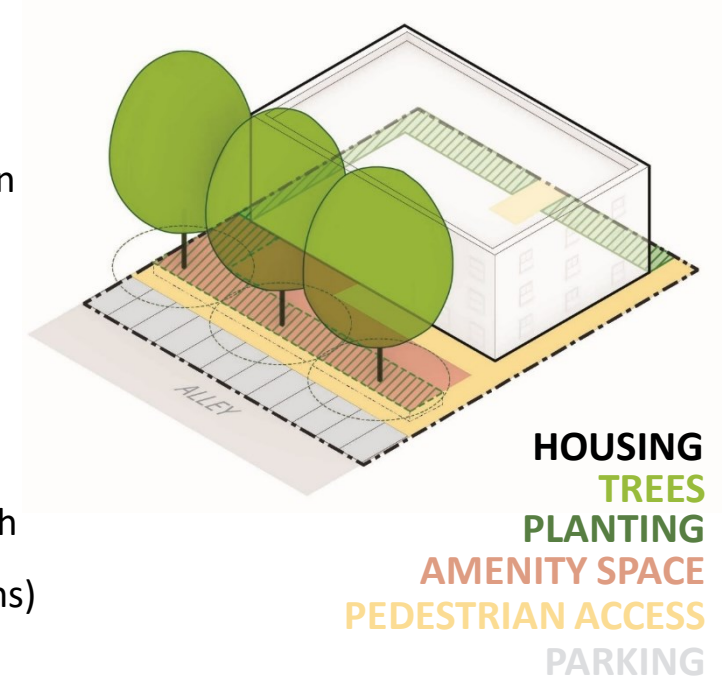
# Landscaping Code Updates to Promote Housing + Trees

## Objectives:

- Balance elements that need space on a lot: housing, trees, planting, amenity space, pedestrian access & parking
- Simplify landscaping code
- Require trees (/tree credits) for all developments
- Implement tree preservation requirements on private property
- Match code requirements to best practices / available science to support long term tree health
- Ensure long term maintenance through inspections and bonds (staffing/resourcing implications)
- Where possible, align with current right-of-way tree standards updates

## Anticipated Outcomes:

- Significant urban forestry benefits that support Citywide 30% tree canopy goal
- Moderate increase in regulatory cost / staff time
- Minor impact on housing development cost, with potential development limitations on sites with valuable existing trees.

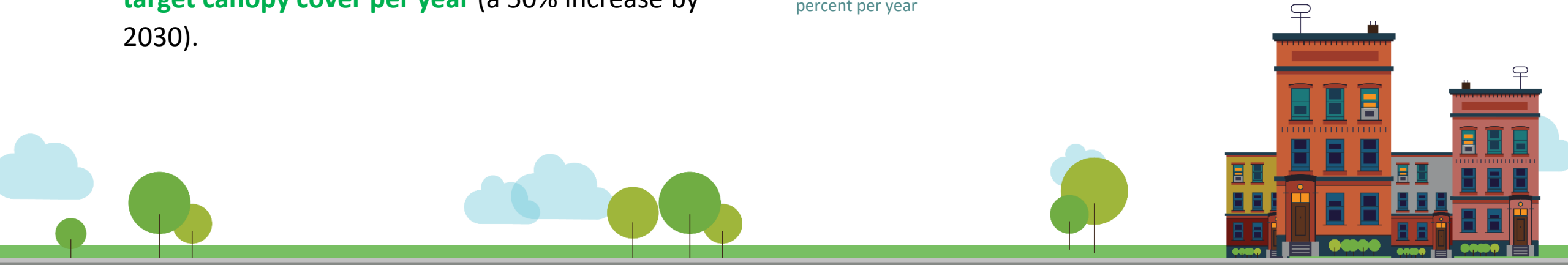
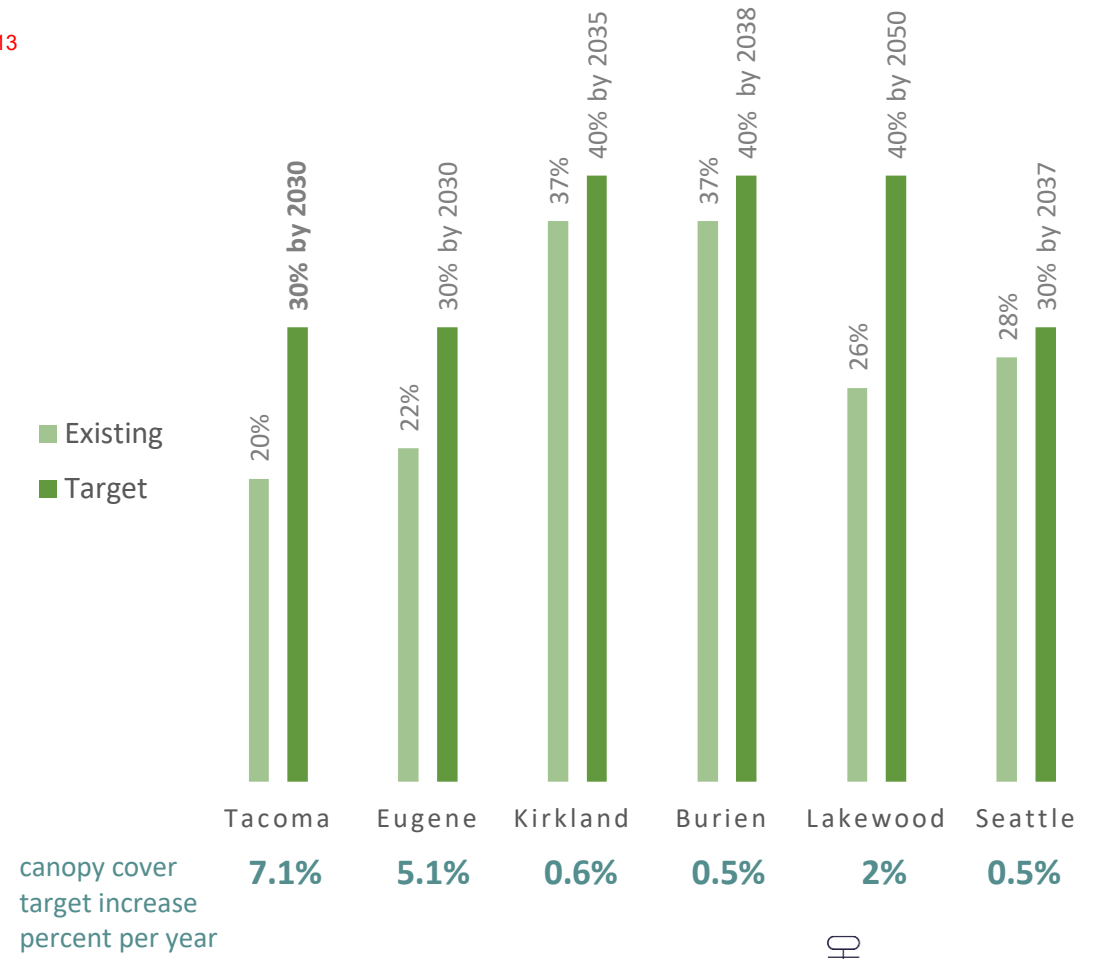




# Tree Canopy Targets

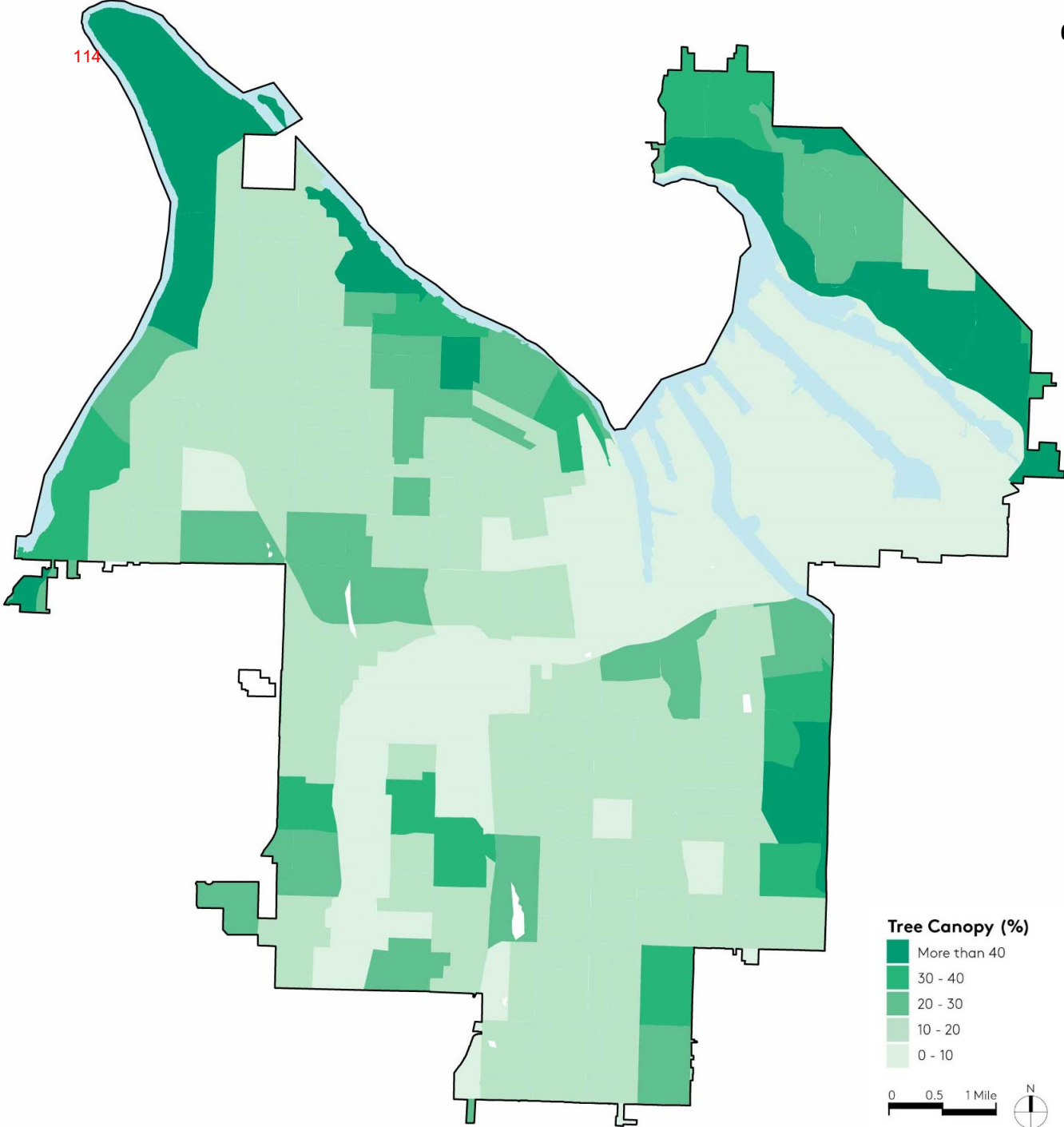
In relation to benchmarked cities:

- Eugene, OR (Middle housing)
  - Kirkland, WA (Middle housing, 2022 Tree & Landscaping ordinance, Green Factor Amendment)
  - Burien, WA (2021 Tree & Landscaping ordinance)
  - Lakewood, WA (2022 Tree Preservation ordinance)
  - Seattle, WA (2023 Tree ordinance)
- 
- Tacoma has the **lowest tree canopy cover with 20%** compared to Kirkland and Burien with 37%.
  - Tacoma has the **greatest difference in existing vs. target canopy cover per year** (a 50% increase by 2030).



# Existing Citywide Tree Canopy

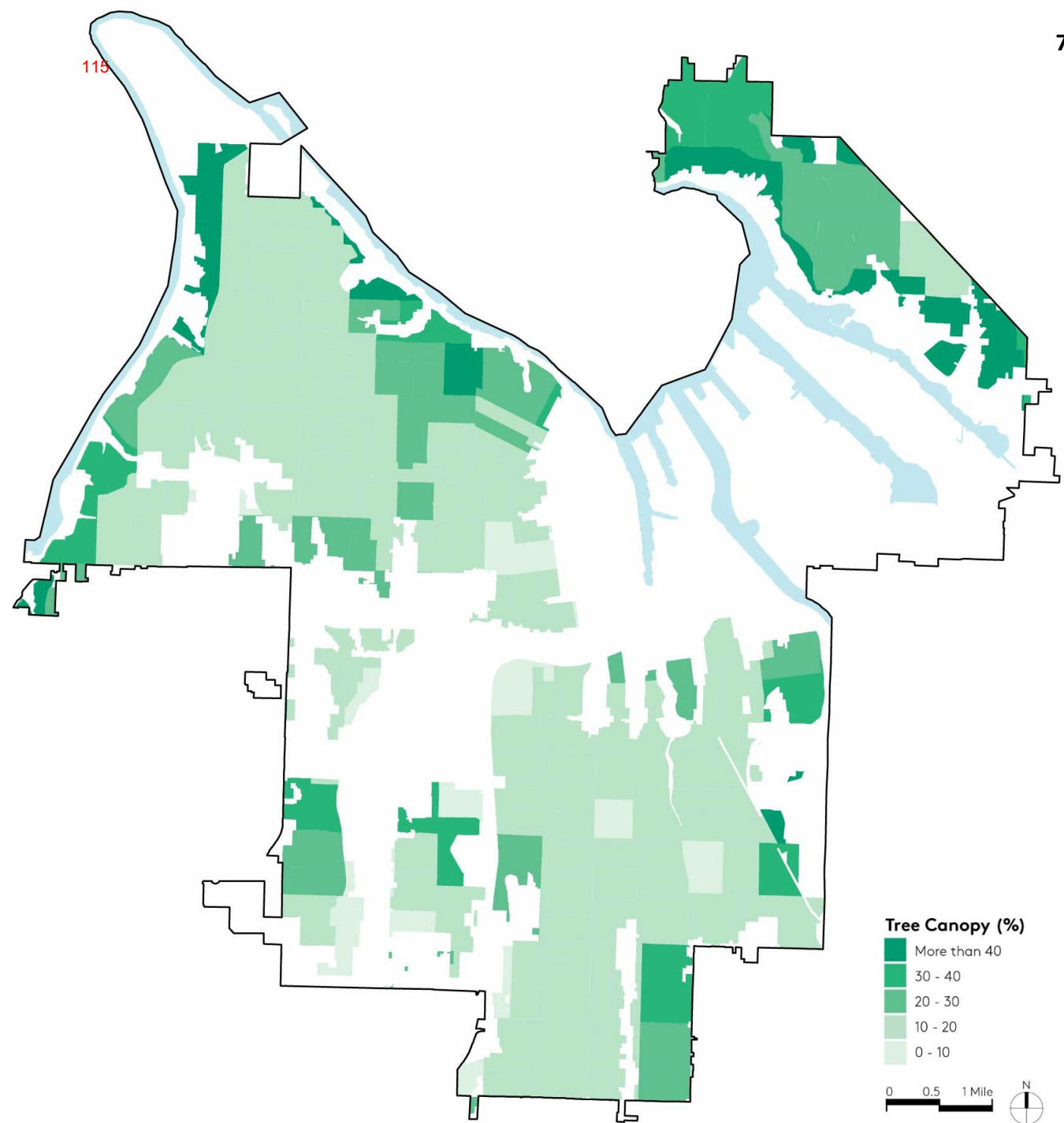
Tacoma's tree canopy is currently **20%** averaged across the city.



# Citywide Tree Canopy & Middle Housing

The existing tree canopy in Middle Housing zones is approximately **18%**.

Middle housing zones cover approximately 50% of the city's land area, while public right-of-way covers approximately 20%.

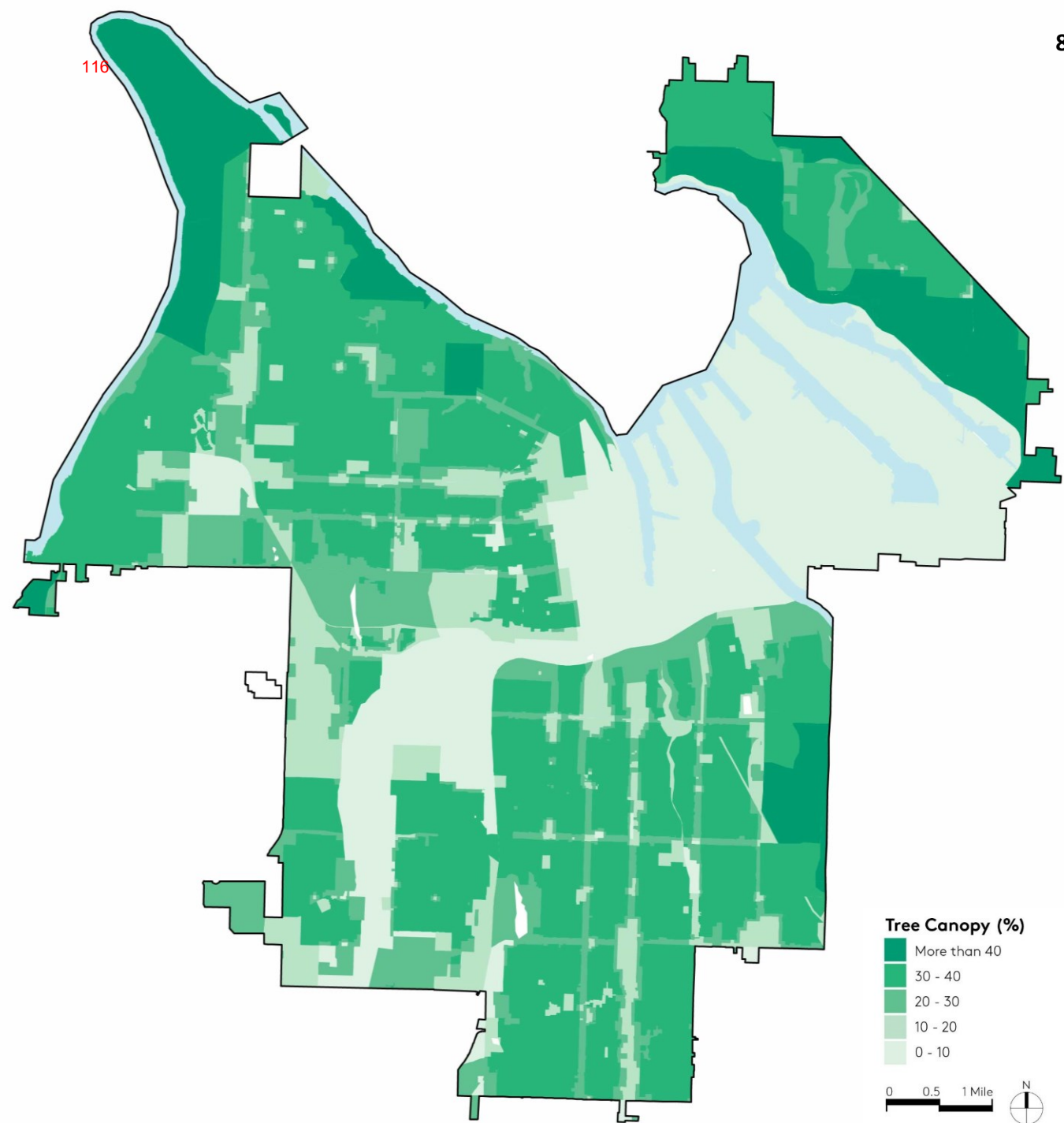


# Citywide Tree Canopy & Middle Housing

Right-of-way and Middle Housing are the two largest land areas with the greatest potential for increased tree canopy.

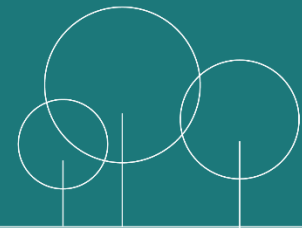
If the average tree canopy across Middle Housing zones and public rights-of-way grew to approximately **32%\***, Tacoma could reach its **30%** tree canopy goal citywide.

\* This estimate does not account for annual tree loss from storms, which would suggest an even higher target.



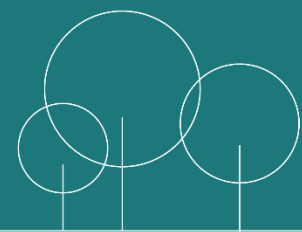
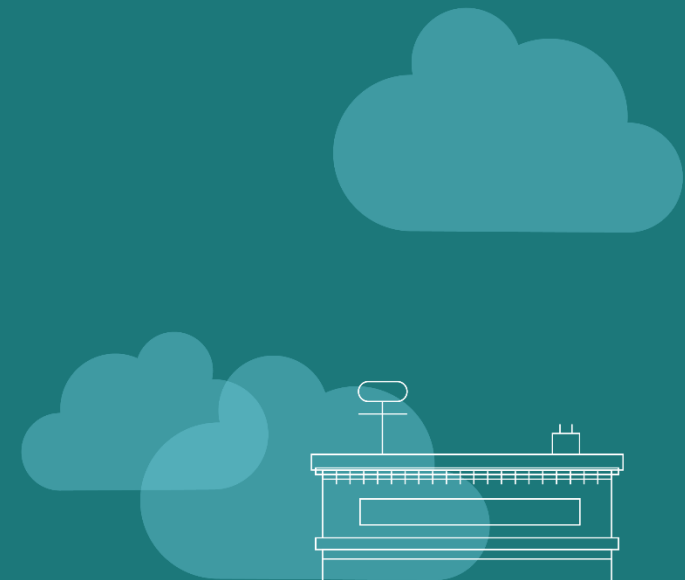
# Proposed Revisions to Standards

- **Proposed Revisions to Landscaping Standards (General / All Zones)**
  - Credits for small, medium and large trees
  - Minimum tree planting area
  - Minimum soil volumes
  - Tree spacing
- **Proposed Revisions to District Standards (Urban Residential Zones)**
  - Tree Removal Requirements on private property
  - Tree Retention Credits
  - Fee in lieu
  - Exemptions from landscaping requirements
  - Required trees / Tree credits by zone
  - Street trees
  - Parking lot landscaping requirements
- **Beyond Home in Tacoma: Revisions for Further Study**
  - Green Factor
  - Future Recommendation: Revisions to other zones for consistency



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# LANDSCAPING STANDARDS (GENERAL/ALL ZONES)

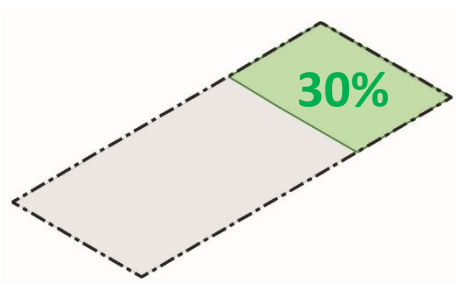


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# Tree “Credits” Concept

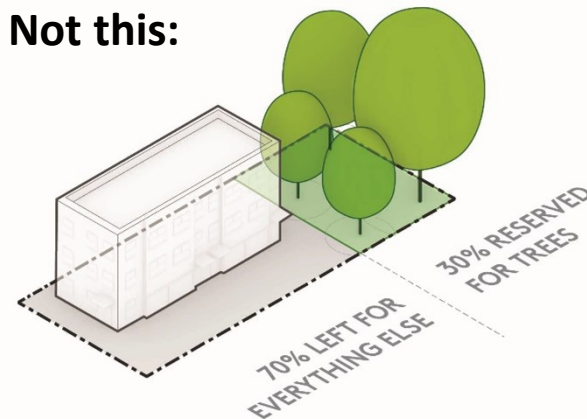
These recommendations propose tree “credits” as a concept to quantify the value of a given tree for the purposes of defining how many trees are required on a given site. This is only a language change from existing standards and is calculated the same as existing requirements for tree canopy coverage by percentage. Removing redundant tree standards and communicating credits as a concept separate from canopy area simplifies requirements and helps convey that trees can overlap with other uses like paths and parking, and are not “taking up” the full area under their canopies.

When 30% of the lot area is used to calculate tree requirements, what does this mean?

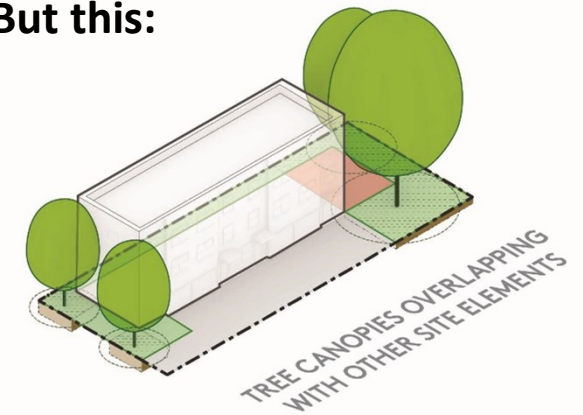


The percentage of lot area is used to determine how many trees or "tree credits" are required on a site.

Not this:



But this:

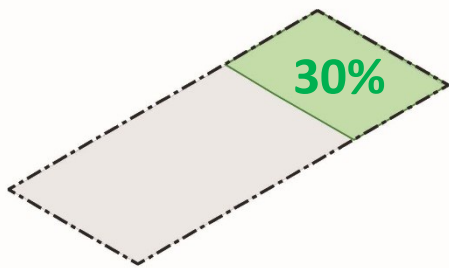




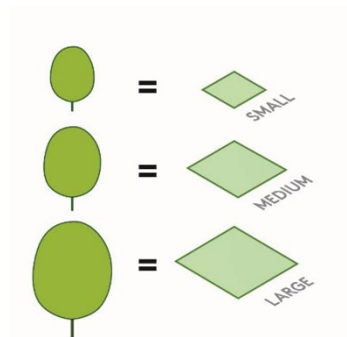
# Credit for Small, Medium & Large Trees

Both existing and new trees provide value, and therefore are worth a certain amount of credit. An existing tree's species and trunk diameter determines how many "credits" are earned for retaining the tree. For new trees, credits are allocated based on whether the mature size of the planted tree species is considered small, medium or large in the Urban Forest Manual.

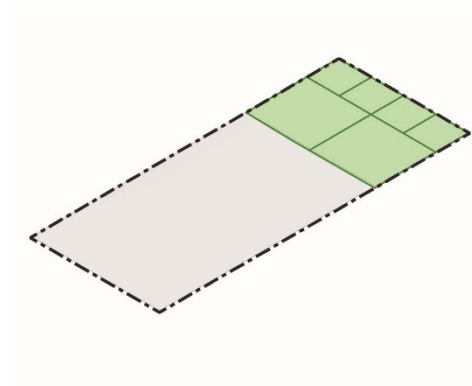
District standards establish the number of tree credits required for a given site and project based on the lot area (i.e. 25%, 30% or 35% by zone). These "credits" can be met by adding the values earned by retained trees and new trees.



The percentage of lot area is used to determine how many trees or "tree credits" are required on a site.



Both existing and new small, medium, and large trees are each worth a certain amount of credit toward this target area.



\* See next page for translation from concept to code revision



# Credit for Small, Medium & Large Trees<sup>121</sup>

## Citywide / all zones

### Existing credits for small, medium and large trees (defined in square feet to suggest connection to canopy)

300 sf for small trees, 500 sf for medium trees, 1,000 sf for large trees

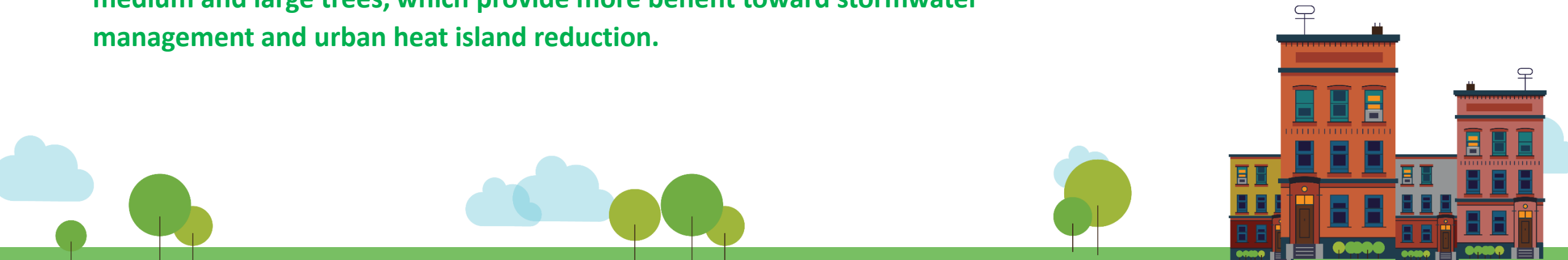
### Proposed credits for small, medium and large trees (“sf” removed)

200 credits for small trees, 500 credits for medium trees, 1,000 credits large trees

## Why?

- Reducing the credit allocated to small trees can incentivize the planting of medium and large trees, which provide more benefit toward stormwater management and urban heat island reduction.

Additional recommendation: increase the species designated as “large” trees in the Urban Forest Manual



# Tree Planting Area

## Citywide / all zones

### Existing minimum tree planting area

Area: Small: 4' x 6' min, Medium: 5' x 8' min, Large: 6' x 10' min.

### Proposed minimum tree planting area

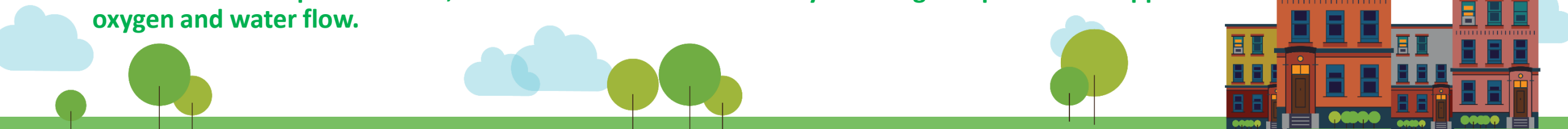
Minimum 5' width planting area, with allowances for reduction to 4' width if required to provide ADA sidewalk or if existing structures or infrastructure restrict planting area. If 5' width is not achievable, trees must be selected from species approved in Urban Forest Manual for structural integrity in reduced planting.

Note: This sets a minimum 5' x 5' opening for trees at the surface, with volume requirements defining the amount of soil required for each tree. Flexibility for a reduction to 4' width accommodates existing right-of-way designed to 4' planting width dimensions. Urban Forest Manual updates could define which species are allowed in planting areas that are 4' wide.

### Why?

- **Soil “volume” is more critical than “area” for tree health. Focusing requirements on a minimum volume and requiring a minimum opening at the surface for growth of the trunk and root crown better matches code requirements to the parameters that will influence tree longevity. The use of structural soil cells under pavement allow for soil volumes to extend under adjacent hardscape, which is critical to providing adequate soil in constrained areas. These cells provide additional stormwater absorption benefit, and contribute to soil health by reducing compaction to support oxygen and water flow.**

Note: To be coordinated with current right-of-way tree standards updates



# Minimum Soil Volume Per Tree <sup>123</sup>

## Citywide / all zones

### Existing minimum soil volumes

Soil volume: Small: 72 cu ft, Medium: 120 cu ft, Large: 180 cu ft

### Proposed minimum soil volumes

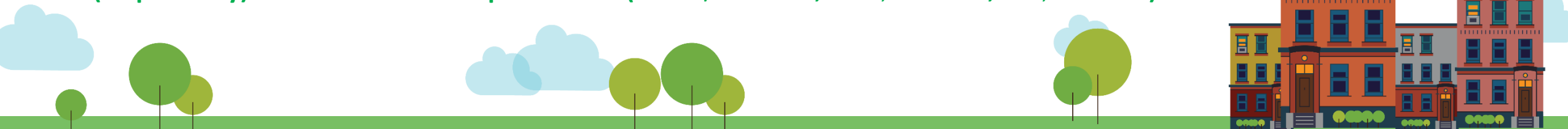
Soil volume: Small: 500 cu ft, Medium: 1,000 cu ft, Large: 1,500 cu ft

Soil volume can be shared by multiple trees, provided each individual S / M / L tree has no less than 500 / 800 / 1200 cubic ft soil volume, respectively.

Note: Subsurface structural soil cells count toward soil volumes

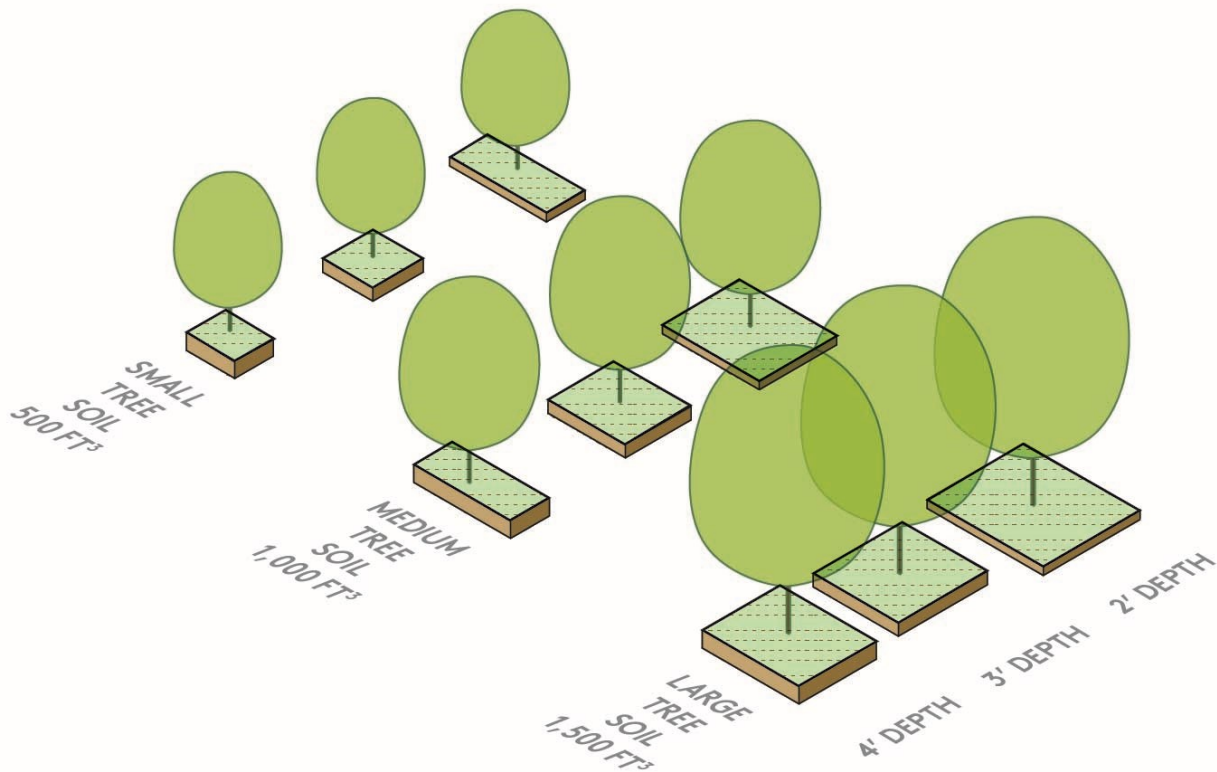
## Why?

- **Trees do not provide measurable benefits until 8 to 12 years of age, yet the average tree lifespan is 7 years in an urban landscape. Providing adequate soil volume is necessary for long-term success.**
- **Out of all required soil volumes benchmarked, Tacoma had the lowest. Seattle requires more than double the volume (and 1,200 cu ft for street trees), and Eugene and Kirkland suggest or require (respectively) 7 times Tacoma's requirements. (S: 500/600 cu ft; M: 1,000 cu ft; L: 1,500 cu ft).**

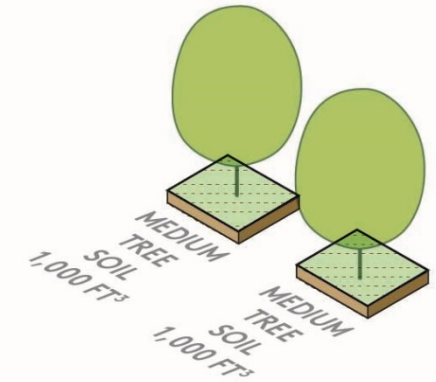


# Explaining Soil Volume Standards

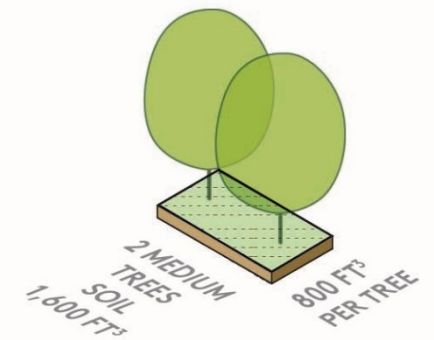
Soil volumes can be met with many different geometries:



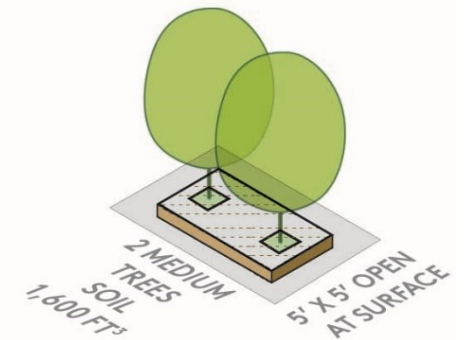
Soil volumes might occur in separate planting areas for different trees:



But shared soil volumes allow a lower volume to be used per tree:

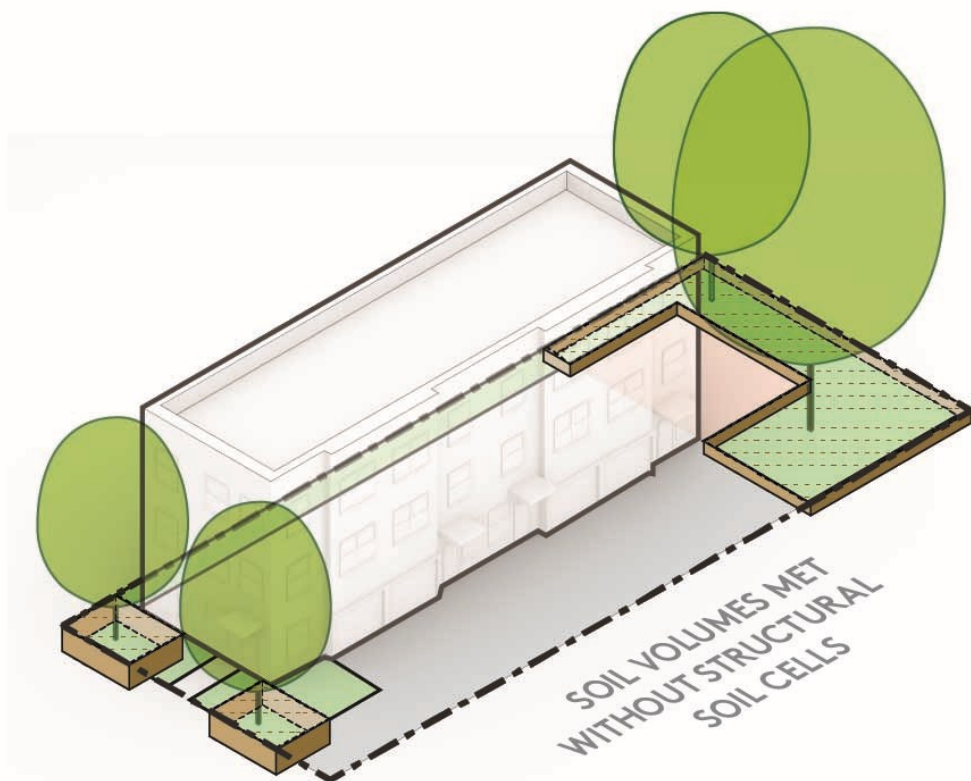


And with structural soils, paving can extend over soil to allow for overlapping uses:

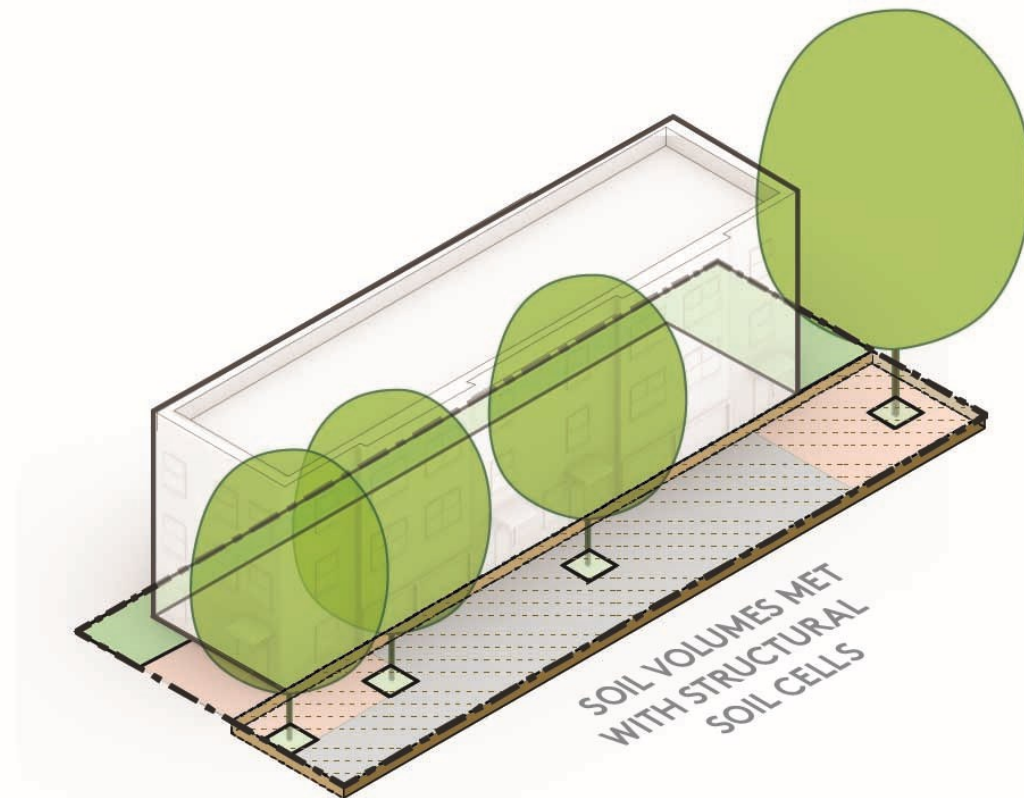


# Explaining Soil Volume Standards

125



On many lots, these soil volume requirements can be attained with no use of structural soil.



On constrained sites, or where additional paving is desired, soil cells can provide required soil volume underground, while openings at the surface may be reduced as small as 5' x 5' as shown above.

# Minimum Tree Clearances

## Citywide / all zones

### Existing tree spacing

Minimum trunk-to-trunk distance: Small: 10' min, Medium: 25' min, Large: 40' min.

### Proposed tree spacing

Minimum trunk-to-trunk distance: Small: 10' min, Medium: 16' min, Large: 22' min.

Minimum trunk-to-building distance: Small: 7' min, Medium: 8' min, Large: 12' min.

## Why?

- Reducing the minimum spacing between medium and large trees can incentivize their planting over small trees on constrained sites.
- Reducing minimum spacing enables trees to be planted on constrained urban sites, frequently where their benefits are most needed
- Reducing minimum spacing also acknowledges that not all trees live to old age, and prioritizes making it possible to plant the trees in the first place



# Small, Medium & Large Trees

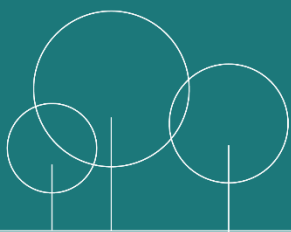
## Overview of Proposed Standards

Proposed Standards \ Tree Size	Small tree	Medium tree	Large tree
Tree Credits	200 credits	500 credits	1,000 credits
Minimum Planting Area*	5' x 5'	5' x 5'	5' x 5'
Soil Volume	500 ft <sup>3</sup>	1,000 ft <sup>3</sup> (or 800 ft <sup>3</sup> if shared**)	1,500 ft <sup>3</sup> (or 1,200 ft <sup>3</sup> if shared**)
Minimum Trunk-to-Trunk Tree Spacing	10 feet	16 feet	22 feet
Minimum Trunk-to-Building Clearance	7 feet	8 feet	12 feet

\* This is the minimum opening for soil at the surface, provided structural soil cells are used to provide adequate volume underground. The minimum width can be reduced from 5' to 4' if ADA sidewalk (4' min. width) is otherwise infeasible.

\*\* Soil volume can be shared by multiple trees, provided each individual Small / Medium / Large tree has no less than 500 / 800 / 1,200 cubic ft soil volume, respectively.

# DISTRICT STANDARDS: URBAN RESIDENTIAL ZONES



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# Tree Removal Requirements <sup>129</sup>

Urban Residential (UR-1) (Lowscale)	Urban Residential (UR-2) (Lowscale)	Urban Residential (UR-3) (Midscale)
<b>Existing permit requirements for removal</b> Permit only required for critical areas and right-of-way tree removal		
<b>Proposed permit requirements for removal</b> Require a permit for removal of all trees greater than 6" DBH (diameter at breast height) both associated with and not associated with development on private property Consider restriction on construction permit review where trees have been illegally removed On site replacement required, or fee in lieu		

## Why?

- **Trees do not provide measurable benefits until 8 to 12 years of age, yet the average tree lifespan is 7 years in an urban landscape. This suggests the need to regulate removal of existing trees and encourage retention through incentives to meet citywide tree canopy goals.**

### Potential to model after Seattle Code:

- Tier 1 trees can only be removed in emergency / if hazardous
- Tier 2 can only be removed if limiting development potential (max lot coverage in Seattle)
- Tier 3 & 4 can be removed with development permit

Tier 1: Heritage Trees  
 Tier 2: 24" DBH or greater, tree groves, species per Director's rule  
 Tier 3: 12" < 24" DBH minus Tier 2 trees per Director's rule  
 Tier 4: 6" < 12" DBH

# Tree Retention Credits

**Urban Residential (UR-1)**  
(Lowscale)

**Urban Residential (UR-2)**  
(Lowscale)

**Urban Residential (UR-3)**  
(Midscale)

## Existing Tree Retention Requirements & Credits

Retained trees provide credit toward landscaping requirements.

## Proposed Tree Retention Requirements & Credits

Retained trees provide credit toward landscaping requirements (no change to credit allocation to the right)

Tree requirements clearly allow both retained and new trees to count toward required “tree credits” based on lot area.

Flexibility offered where tree retention would limit by-right development.

Defined maximum encroachment within tree protection zone for retained tree.

### Determining Tree Credits for Existing Trees:

(Tacoma’s existing code)

One required tree per retained tree of equal size

2 required trees per retained tree 8"-20" DBH

3 required trees per retained tree 20"-32" DBH

4 required trees per retained tree >32" DBH

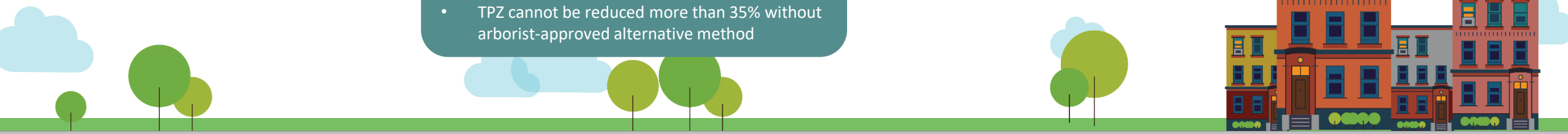
Retained trees count as small, medium or large according to their species

Evergreen trees planted above minimum evergreen requirement gives a credit of 1.1 trees.

Parking lot flexibility given when over 2/3 trees are evergreen.

### Potential reference from Seattle:

- No encroachment within 1/2 TPZ radius
- Existing encroachments may remain or be replaced if no damage would result.
- TPZ cannot be reduced more than 35% without arborist-approved alternative method

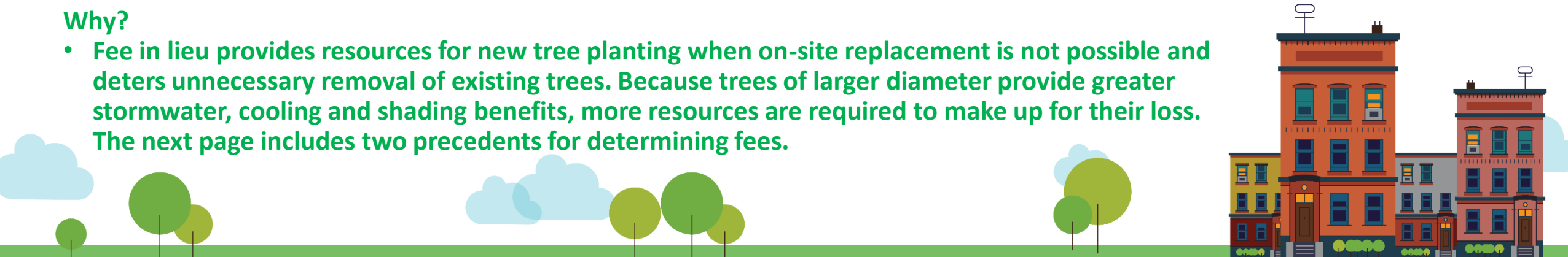


# Fee in Lieu of Tree Replacement

Urban Residential (UR-1) (Lowscale)	Urban Residential (UR-2) (Lowscale)	Urban Residential (UR-3) (Midscale)
<b>Existing fee in lieu</b> Price per tree: \$750.00		
<b>Proposed fee in lieu</b> Consider fee in lieu proportional to tree size (see next page for fee precedents). Policy decision needed for applicability and enforcement. Recommendation: <ul style="list-style-type: none"> <li>• Trees over 24" DBH cannot be removed.</li> <li>• Trees 12" ≤ 24" DBH can only be removed if retention would limit by-right development. Fee in lieu allowed if onsite replacement is not feasible.</li> <li>• Trees 6" ≤ 12" DBH can be removed if corresponding tree credits are replaced onsite. Fee in lieu allowed if onsite replacement is not feasible.</li> <li>• Less than 6" DBH not regulated</li> </ul>		

## Why?

- **Fee in lieu provides resources for new tree planting when on-site replacement is not possible and deters unnecessary removal of existing trees. Because trees of larger diameter provide greater stormwater, cooling and shading benefits, more resources are required to make up for their loss. The next page includes two precedents for determining fees.**



# Fee in Lieu of Tree Replacement

Preservation, Fee in Lieu (Private Trees)			
Trees ≥12 and <20 inches diameter	\$	1,800.00	per tree
Trees ≥20 inches diameter	\$	450.00	per inch
Planting and Establishment, Fee in Lieu	\$	675.00	per on-site tree
Planting and Establishment, Fee in Lieu	\$	450.00	per inch
NON-DEVELOPMENT			
Removal Application (1-3 trees)	\$	100.00	
≥4 trees, Additional Fee	\$	25.00	per tree
Replanting Waiver Application	\$	100.00	
Root Inspection	\$	178.00	
Pruning Permit (no inspection required)		no charge	
Pruning Application (Inspection Required)	\$	50.00	
Planting Application		no charge	
Chemical Treatment Application	\$	150.00	
Appeal Application	\$	200.00	
Tree Attachment Application	\$	300.00	
Ornamental Lighting Application (1-10 trees)	\$	35.00	
11-50 trees, Additional Fee	\$	45.00	
51-100 trees, Additional Fee	\$	75.00	
101-200 trees, Additional Fee	\$	100.00	
201-500 trees, Additional Fee	\$	175.00	
>500 trees, Additional Fee	\$	250.00	
Planting and Establishment, Fee in Lieu	\$	450.00	per inch

**Portland** Tree Fees are broken down in a detailed table, distinguishing between “Development” and “Non-development”

“The fee per tree is the entire cost of establishing a new tree in accordance with standards described by the City Forester. The cost includes materials and labor necessary to plant the tree, and to maintain it for 5 years. The fee will be reviewed annually and, if necessary, adjusted to reflect current costs.”

Payment categories	Required mitigation	Payment In-Lieu*
Significant trees 12” and larger (that are not Exceptional)	Cost of (2) two-inch diameter replacement trees	\$436
Exceptional trees as defined by the Exceptional Tree Director’s Rule (x -2022)	Cost per square inch** of trunk for each tree removed	\$17.87/square inch

\* Additional City costs may be covered by the payment in addition to what is shown in the Table such as to cover establishment of planted trees for a period, likely three to five years.

\*\*Area in square inches of tree removed is calculated as follows:

- Measure diameter of tree at breast height (DBH) as defined in SMC 25.11 in inches and divide by 2 to get the radius.
- Square the radius and multiply by PI (r<sup>2</sup> x 3.14) to get the area in square inches of the removed tree measured at DBH.

**Seattle** fee in lieu is determined by Guide for Plant Appraisal, with additional fees for Significant and Exceptional trees to cover establishment of planted trees for a period (3-5 years):

$$\text{Nursery purchase price}^* / \text{square inches of the nursery tree}^{**} = \text{unit cost to replace tree}$$

$$\text{Square inches of tree removed}^{***} \times \text{unit cost to replace the tree} = \text{payment in lieu amount}$$

\*Nursery purchase price = the average price of common trees found on sites in Seattle per survey from area nurseries.

\*\*Square inches of the nursery tree is the average size of replacement tree per survey from area nurseries.

\*\*\*Square inches of tree removed provided by permit applicant.

SDCI shall periodically conduct update to the inputs for the formula above including surveys of regional tree nursery prices to provide the resulting payment to be provided in subsequent rule(s).

# Exemptions from Landscaping Requirements

Urban Residential (UR-1) (Lowscale)	Urban Residential (UR-2) (Lowscale)	Urban Residential (UR-3) (Midscale)
<b>Existing landscaping requirement exemptions</b> Single-family, duplex and triplex exempt from landscaping requirements, except street trees		
<b>Proposed: No exemption from landscaping standards for single, two and three family and townhouse developments</b>		

## Why?

- Middle housing zones cover approximately 50% of the city's land area. Meeting citywide tree canopy goals requires that landscaping requirements extend to these housing types.



# Required Trees / Tree Credits by Zone <sup>134</sup>

Urban Residential (UR-1) (Lowscale)	Urban Residential (UR-2) (Lowscale)	Urban Residential (UR-3) (Midscale)
<b>Existing Required Trees (Canopy Coverage)</b> R-1, R-2, R-2 SRD, HMR-SRD: not required R-3, R-4-L: 30% lot area R-4: 20% lot area		
<b>Proposed Required Tree Credits per</b> 35% lot area	30% lot area	25% lot area

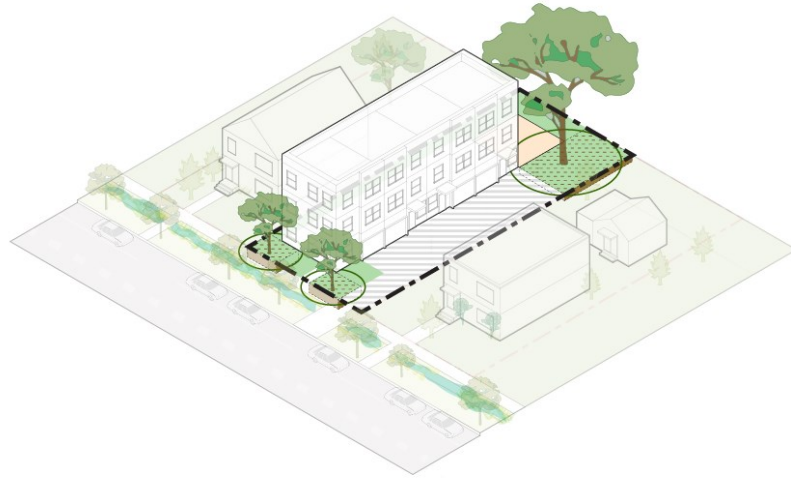
## Why?

- Middle housing zones cover approximately 50% of the city's land area. Increasing the average tree canopy across these zones to approximately 32% is an important step in reaching the City's 30% tree canopy goal (see maps on intro slides).

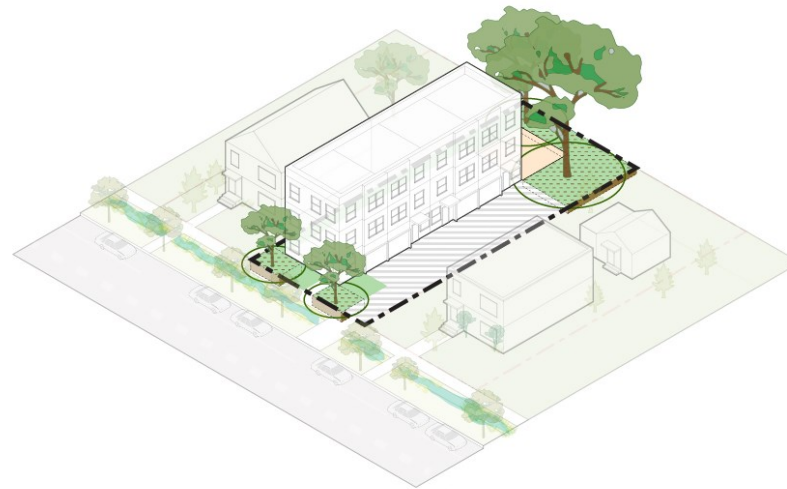


# Tree Credits – Visual Comparison

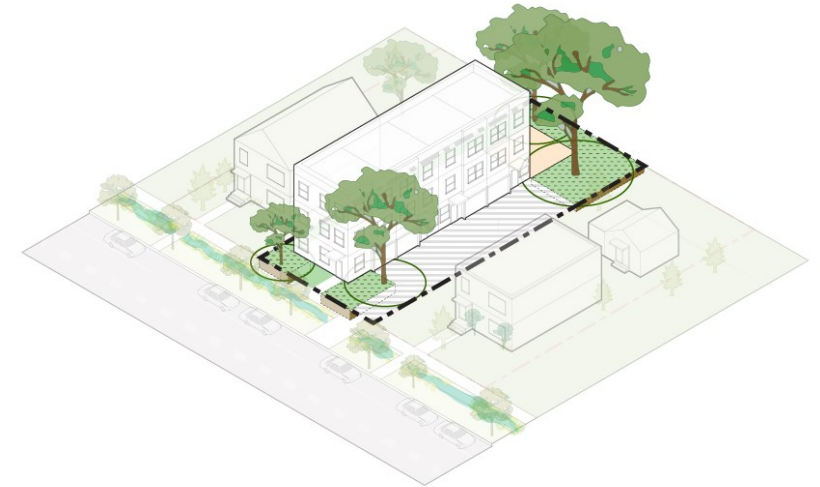
135



Zone: UR-1, 2, 3  
 Units: 4  
 FAR: 1  
 Height: 35'  
 Parking: 1 stall/unit  
 Amenity Space: 492 SF/unit  
 Tree Credits: Equivalent to  
**25% lot area**



Zone: UR-1, 2, 3  
 Units: 4  
 FAR: 1  
 Height: 35'  
 Parking: 1 stall/unit  
 Amenity Space: 492 SF/unit  
 Tree Credits: Equivalent to  
**30% lot area**



Zone: UR-1, 2, 3  
 Units: 4  
 FAR: 1  
 Height: 35'  
 Parking: 1 stall/unit  
 Amenity Space: 492 SF/unit  
 Tree Credits: Equivalent to  
**35% lot area**

# Street Trees

## Urban Residential (UR-1) (Lowscale)

## Urban Residential (UR-2) (Lowscale)

## Urban Residential (UR-3) (Midscale)

### Existing Street Trees

4 small, 3 medium, or 2 large trees per 100' of street frontage.

Exemptions:

- Where not feasible to provide in right-of-way, trees within 10' of property line can count toward requirement
- Single Family

### Proposed Street Trees

- Existing requirements maintained, with exemption for Single Family removed
- To be coordinated with current right-of-way tree standards updates





# Parking Lot Landscaping

Urban Residential (UR-1) (Lowscale)	Urban Residential (UR-2) (Lowscale)	Urban Residential (UR-3) (Midscale)
<p><b>Existing Parking Area Tree Minimum - Overall</b> One Small Tree per 700 square feet; one Medium Tree per 1,000 square feet; or, one Large Tree per 1,400 square feet of parking lot area.</p> <p>(a) Parking Lot Perimeter Landscaping is not required in M-2 or PMI Districts (b) Parking lots of 15 stalls or less are not required to meet Interior Planting requirements. (c) Parking lots of 15 stalls or less, located behind buildings and accessed by alleys, are exempt from the Site Perimeter requirement.</p>		<p><b>Existing Parking Lot – Interior Planting Requirements.</b> A mixture of trees, shrubs and groundcover meeting the following requirements:</p> <p>(a) At least one Small Tree per 200 sf, one Medium Tree per 300 sf; or one Large Tree per 400 sf of landscaped area. (b) Trees planted shall be generally evenly distributed over the site. Shrubs and groundcover plants as required above. (c) Trees placed to create a canopy in desired locations without obstructing necessary view corridors.</p>
<p><b>Proposed: Parking lot landscaping requirements focus on distribution. No parking-specific tree calculation; all trees count toward required tree credits per lot area.</b> Parking Lot Perimeter Landscaping is not required in UR-1, UR-2, UR-3 Districts Parking Landscape Requirements for 16 stalls or less:</p> <p>(a) No stall shall be more than 50 feet from a tree trunk. (b) Long rows of parking shall be broken by islands or peninsulas with trees, such that there are no more than eight parking stalls in a row without a tree. Where this cannot be accommodated within the interior landscape, trees may be located in the perimeter landscape within 10' of the parking area. (c) Parking lot trees may be counted toward overall District Standard for tree credits based on lot area</p>		

## Why?

- **Current landscaping code is oriented toward larger parking lots with multiple rows of parking. We suggest changing the threshold to 16 stalls rather than 15 (which corresponds to the maximum density on a double 12,000 SF lot in the UR-3 zone) and simplifying the code for Middle Housing.**



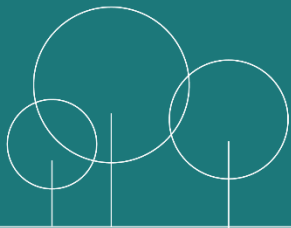
# Inspections / Bonding

Some cities have implemented systems for post-planting follow up / bonding requirements. For more information, City staff in the following cities could provide insight into workload implications:

- Security deposit / letters of credit required for all replacement trees to ensure survival (Victoria, B.C.)
- Bonds for proper maintenance (Burien, Lakewood)
- Maintenance Periods:
  - 5 years / life of “development” (Kirkland)
  - Life of “project” (Burien)
  - Life of “project” (Seattle)
  - 3 years / life of “project” (Tacoma)



# BEYOND HOME IN TACOMA REVISIONS FOR FURTHER STUDY



# For Further Study: Green Factor

140

Green Factor is a tool that provides flexibility to support increased housing and equivalent benefits of tree function such as green roofs, vegetation layers, soils and pervious surfaces. Taken together, the landscaping benefits can improve quality of life, as illustrated below.



- LANDSCAPE ELEMENTS**
- A BIORETENTION FACILITIES AND/OR SOIL CELLS
- B STRUCTURAL SOIL SYSTEMS
- C LANDSCAPE AREAS WITH SOIL DEPTH LESS THAN 24"
- D LANDSCAPE AREAS WITH SOIL DEPTH OF 24" OR MORE
- E PRESERVATION OF EXISTING TREES
- F PRESERVATION OF LANDMARK TREES BONUS
- G PRESERVATION OF EXISTING EVERGREEN TREES BONUS
- H GROUND COVERS OR OTHER LOW PLANTS
- I MEDIUM SHRUBS OR PERENNIALS
- J LARGE SHRUBS OR PERENNIALS
- K SMALL TREES WITH 500 FT<sup>3</sup> SOIL VOLUME
- L MEDIUM TREES WITH 1000 FT<sup>3</sup> SOIL VOLUME
- M LARGE TREES WITH 1500 FT<sup>3</sup> SOIL VOLUME
- GREEN ROOFS**
- A AREA PLANTED WITH AT LEAST 2" BUT LESS THAN 4" OF SOIL
- B AREA PLANTED WITH AT LEAST 4" BUT LESS THAN 8" OF SOIL
- C AREA PLANTED WITH AT LEAST 8" BUT LESS THAN 30" OF SOIL
- D AREA PLANTED WITH TREES AND LEAST 30" OF SOIL
- GREEN WALLS**
- A FACADE OR WALL SURFACE OBSTRUCTED WITH VINES
- B FACADE OR WALL SURFACE PLANTED WITH A GREEN WALL SYSTEM
- LANDSCAPE QUALITY BENEFITS**
- A LANDSCAPED AREAS IN FOOD CULTIVATION
- B LANDSCAPE AREAS WITH NATIVE OR DROUGHT TOLERANT PLANTS
- C LANDSCAPE AREAS AT SIDEWALK GRADE WHERE THE MAJORITY OF THE AREA IS COVERED WITH VEGETATION THAT IS NATIVE OR DROUGHT TOLERANT, AND/OR PROVIDES HABITAT FOR URBAN WILDLIFE AND POLLINATORS
- D RAINWATER HARVESTING
- E PLANTING THAT PROVIDES FOOD, FORAGE AND REFUGE FOR A DIVERSITY OF SPECIES AND/OR INCLUSION OF HABITAT ELEMENTS SUCH AS WOODY DEBRIS, GRAVEL/COBBLE, NESTING MATERIALS.
- PERMEABLE PAVING**
- A PERMEABLE PAVING OVER 6"-24" SOIL OR GRAVEL
- B PERMEABLE PAVING OVER AT LEAST 24" OF SOIL OR GRAVEL
- INNOVATION**
- A CONTRIBUTE TO DISTRICT SUSTAINABILITY GOALS INCLUDING HABITAT CONNECTIVITY, TREE CANOPY OR STORMWATER GOALS

Required inputs from the developer are clearly identified

Minimum score can be defined by zone

Green Factor Score Sheet		SEATTLE <i>x</i> green factor		
Project title: 1145 NW MARKET ST		enter sq ft of parcel		
Parcel size (enter this value first) *		19,993	SCORE	0.402
<b>Landscape Elements**</b>		Totals from GF worksheet	Factor	Total
<b>A Landscaped areas (select one of the following for each area)</b>				
1	Landscaped areas with a soil depth of less than 24"	enter sq ft 1325	0.1	133
2	Landscaped areas with a soil depth of 24" or greater	enter sq ft 2772	0.6	1,663.2
3	Bioretention facilities	enter sq ft 0	1.0	-
<b>B Plantings (credit for plants in landscaped areas from Section A)</b>				
1	Mulch, ground covers, or other plants less than 2' tall at maturity	enter sq ft 0	0.1	-
2	Shrubs or perennials 2'+ at maturity - calculated at 12 sq ft per plant (typically planted no closer than 18" on center)	enter number of plants 509	6108	0.3
3	Tree canopy for "small trees" or equivalent (canopy spread 8' to 15') - calculated at 75 sq ft per tree	enter number of plants 3	225	0.3
4	Tree canopy for "small/medium trees" or equivalent (canopy spread 16' to 20') - calculated at 150 sq ft per tree	enter number of plants 0	0	0.3
5	Tree canopy for "medium/large trees" or equivalent (canopy spread of 21' to 25') - calculated at 250 sq ft per tree	enter number of plants 3	750	0.4
6	Tree canopy for "large trees" or equivalent (canopy spread of 26' to 30') - calculated at 350 sq ft per tree	enter number of plants 1	350	0.4
7	Tree canopy for preservation of large existing trees with trunks 6"+ in diameter - calculated at 20 sq ft per inch diameter	enter inches DBH 58	1160	0.8
<b>C Green roofs</b>				
1	Over at least 2" and less than 4" of growth medium	enter sq ft 0	0.4	-
2	Over at least 4" of growth medium	enter sq ft 3840	0.7	2,688.0
<b>D Vegetated walls</b>				
		enter sq ft 0	0.7	-
<b>E Approved water features</b>				
		enter sq ft 0	0.7	-
<b>F Permeable paving</b>				
1	Permeable paving over at least 6" and less than 24" of soil or gravel	enter sq ft 0	0.2	-
2	Permeable paving over at least 24" of soil or gravel	enter sq ft 0	0.5	-
<b>G Structural soil systems</b>				
		enter sq ft 0	0.2	-

A greater "factor" incentivizes certain elements by offering more credit

# For Further Study: Green Factor & Alignment with Other Zones

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## Citywide / all zones

Implementing Green Factor is a large project that cannot be accomplished in Home in Tacoma, but should be considered for implementation citywide

## Existing

No Green Factor requirement

## Proposed:

Green Factor system

Extension of the Urban Residential approach to other zones for consistency

## Why?

- **Development Flexibility:** Green Factor allocates credit to trees and other landscape elements that provide similar benefits, so the green strategies chosen can closely match the opportunities of each site and project, while providing the cooling, shading, and stormwater benefits of trees.
- **Ease of Use:** Requirements are combined in a single worksheet with a clearly defined minimum score
- **Incentivizing Large Trees:** The weighting of each element allows cities to incentivize certain elements over others.
- **Staffing Capacity:** Time needed for staffing enforcement is limited because landscape architects certify that installation is aligned with permit drawings



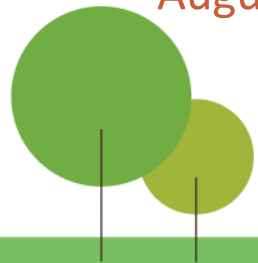


# Affordable Housing

*Home In Tacoma*

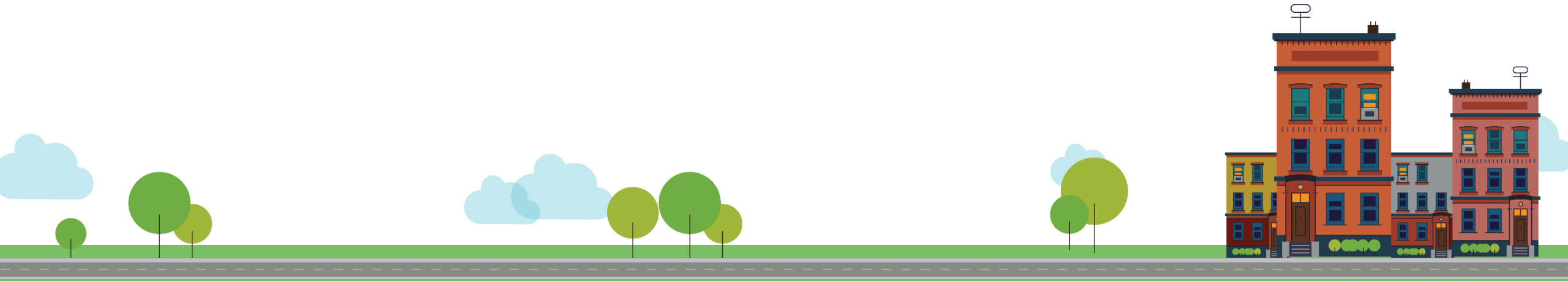
*Landscape Code Benchmarking & Existing Code Audit*

August 2023



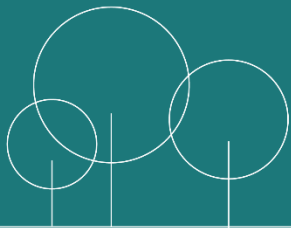
# Contents

- Summary
- Benchmarking
  - Tree Retention
  - Landscaping Code
- Existing Code Audit





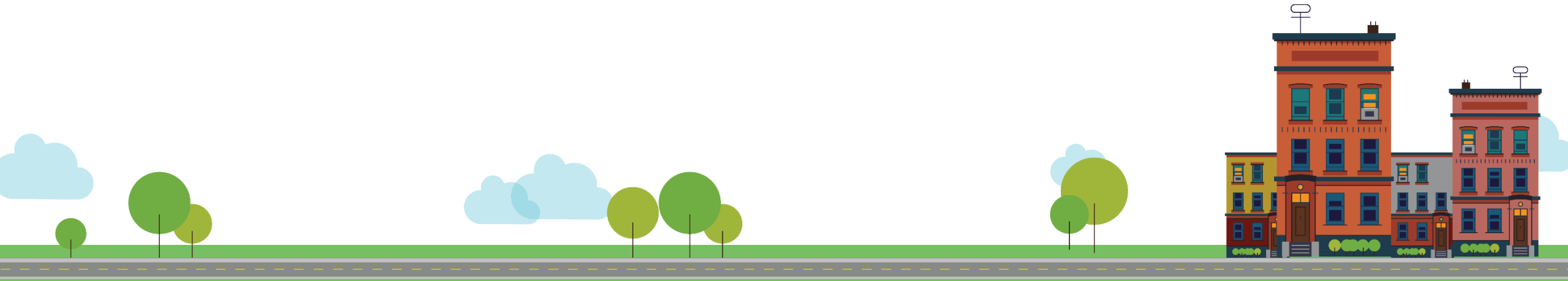
# Summary



# Tacoma Urban Forestry Priorities<sup>146</sup>

## Re-evaluate Tacoma's code to promote **Trees AND Housing**

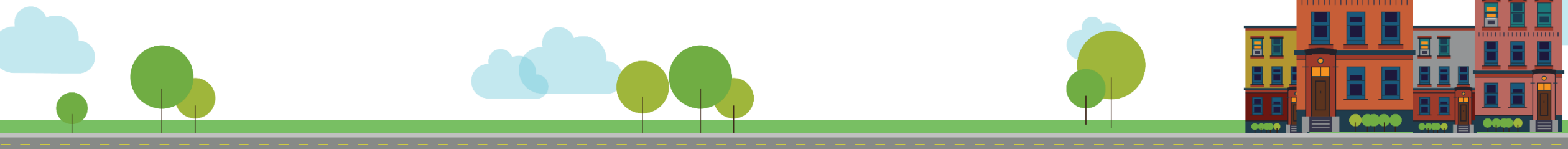
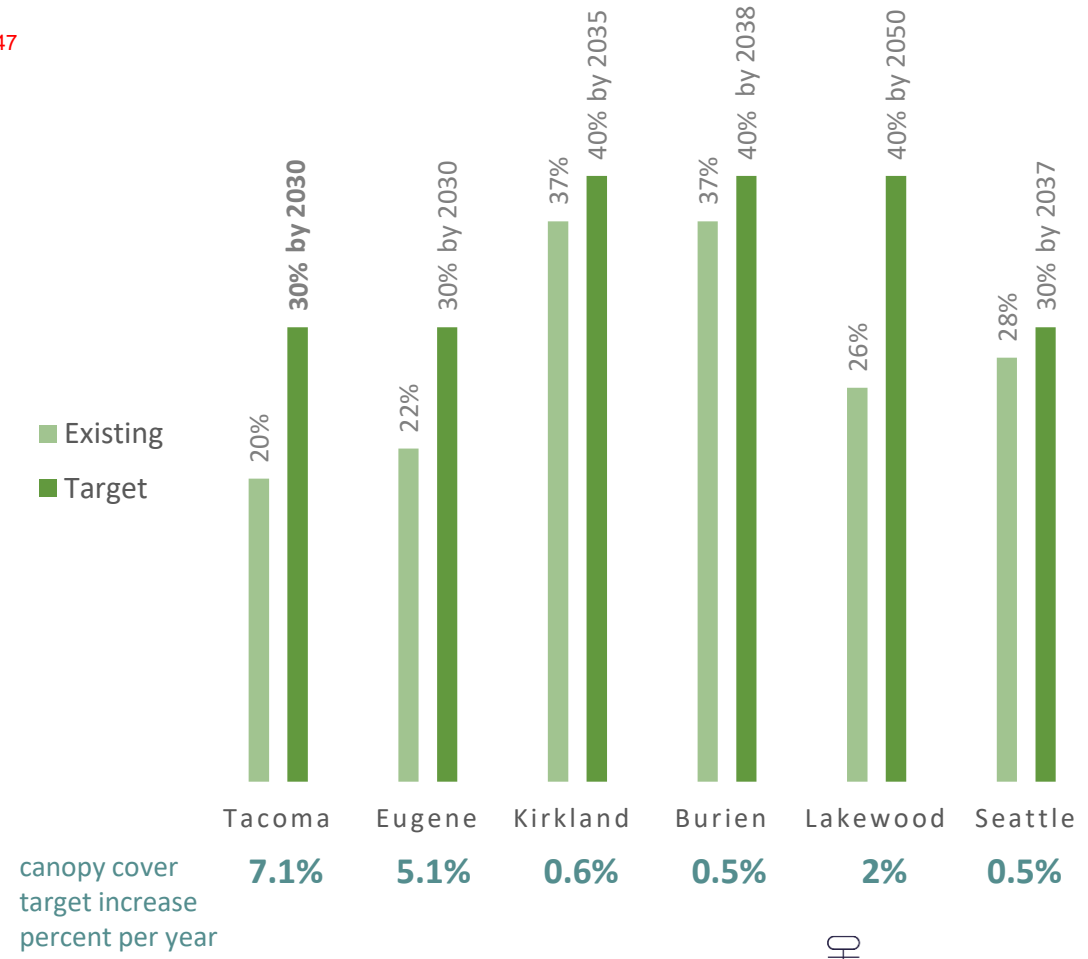
- Simplify landscaping code
- Canopy requirements for all developments
- Tree preservation requirements
- Consider trees as stormwater BMPs
- Understand best practices for lot coverage, impervious surface, landscaped area
- Consider long term maintenance and inspections by arborists (staffing/resourcing, bonds)



# Tree Canopy Targets

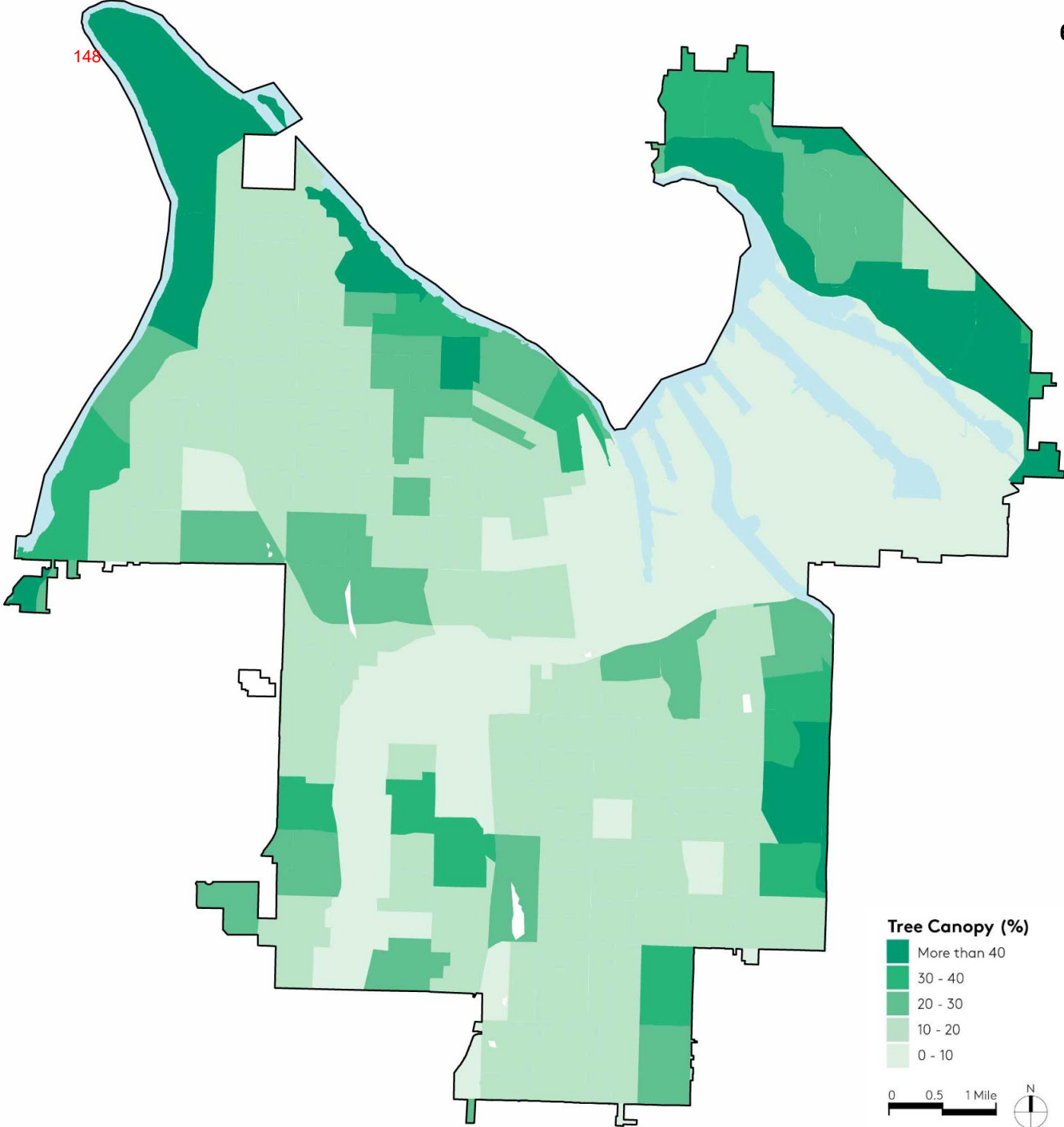
In relation to benchmarked cities:

- Eugene, OR (Middle housing)
  - Kirkland, WA (Middle housing, 2022 Tree & Landscaping ordinance, Draft Green Factor Amendment)
  - Burien, WA (2021 Tree & Landscaping ordinance)
  - Lakewood, WA (2022 Tree Preservation ordinance)
  - Seattle, WA (2023 Tree ordinance)
- Tacoma has the **lowest tree canopy cover with 20%** compared to Kirkland and Burien with 37%.
  - Tacoma has the **greatest difference in existing vs. target canopy cover per year** (a 50% increase by 2030).



# Existing Citywide Tree Canopy

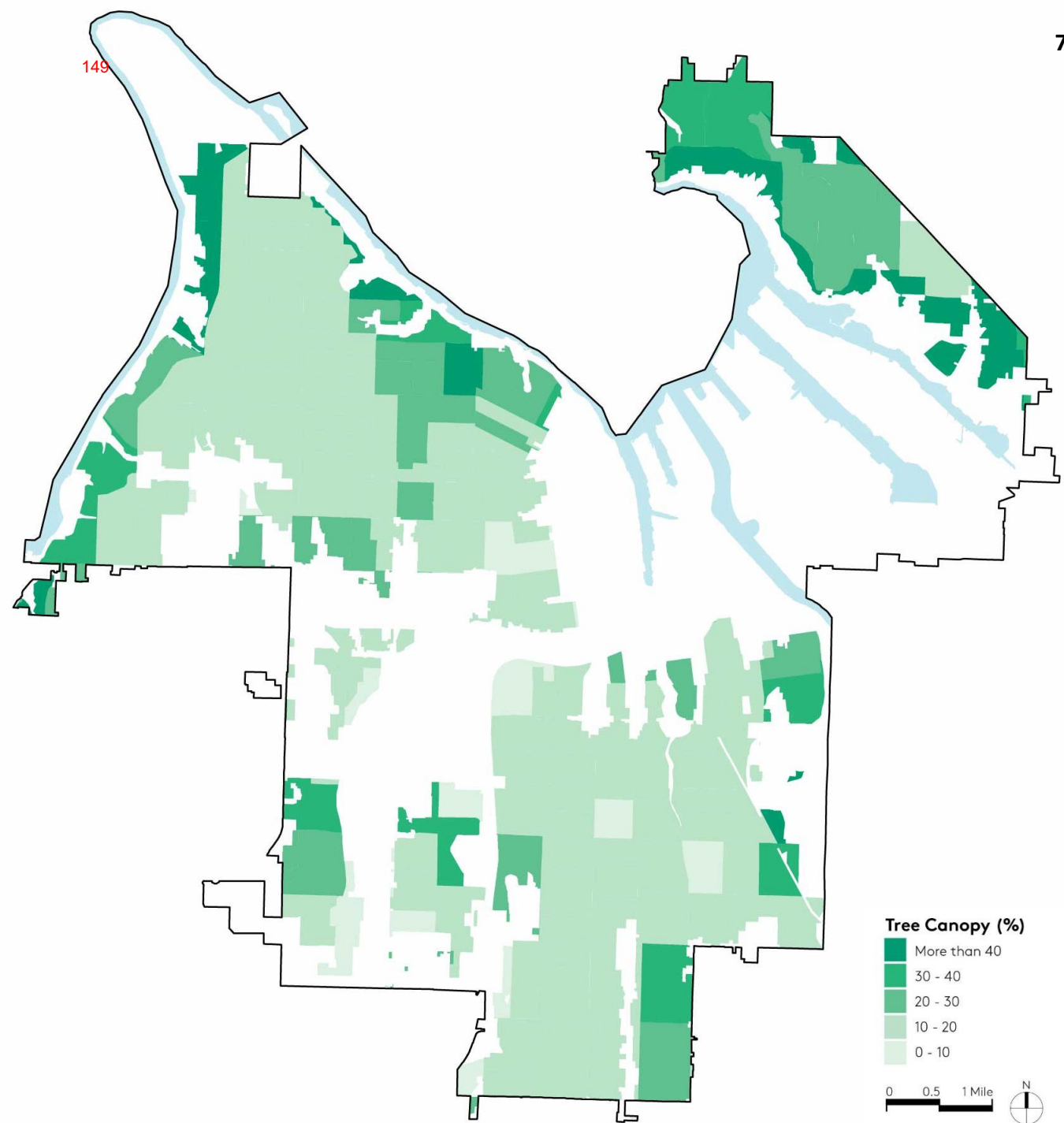
Tacoma's tree canopy is currently **20%** averaged across the city.



# Citywide Tree Canopy & Middle Housing

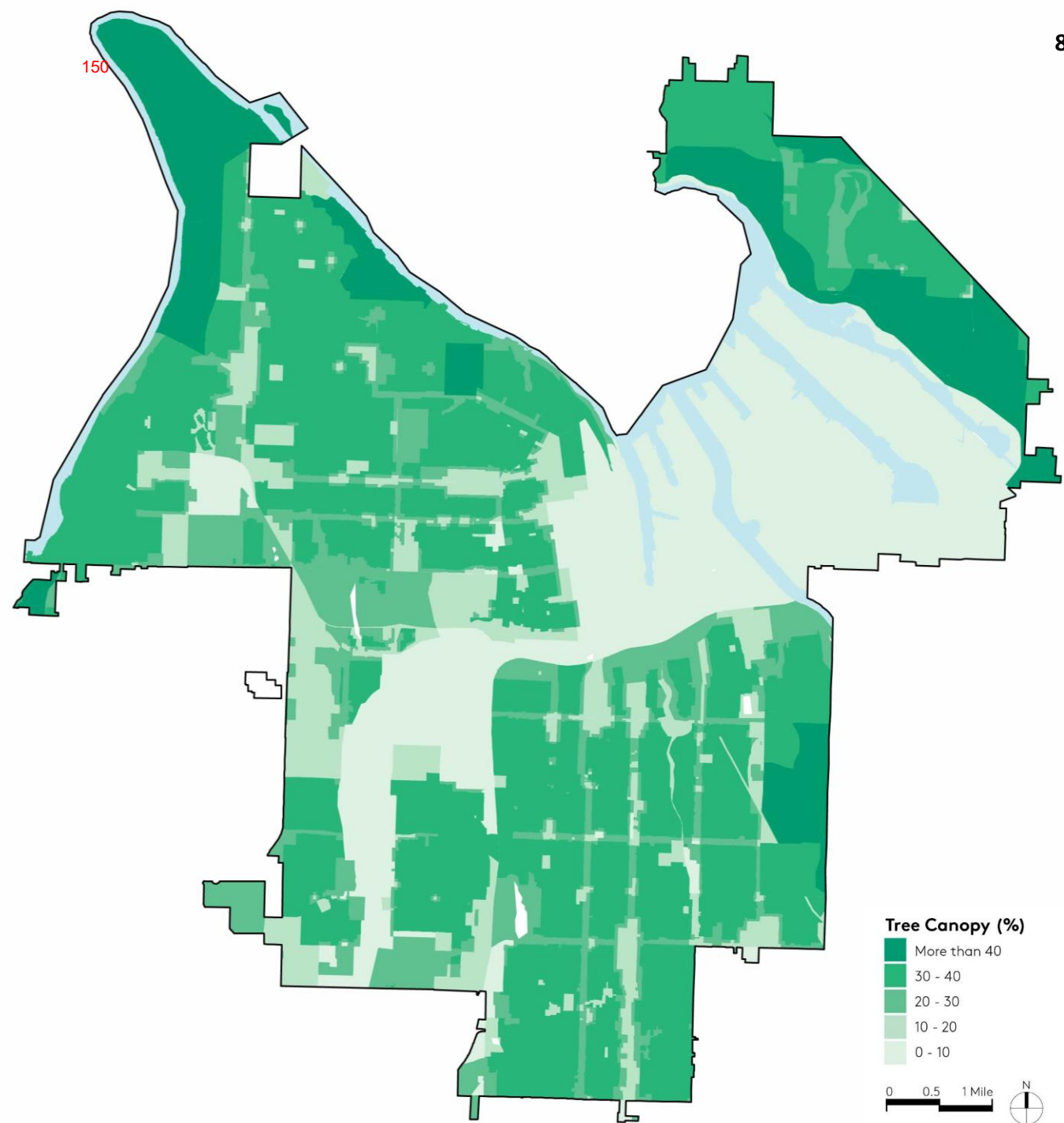
The existing tree canopy in Middle Housing zones is approximately **18%**.

Middle housing zones cover approximately 50% of the city's land area, while public right-of-way covers approximately 20%.



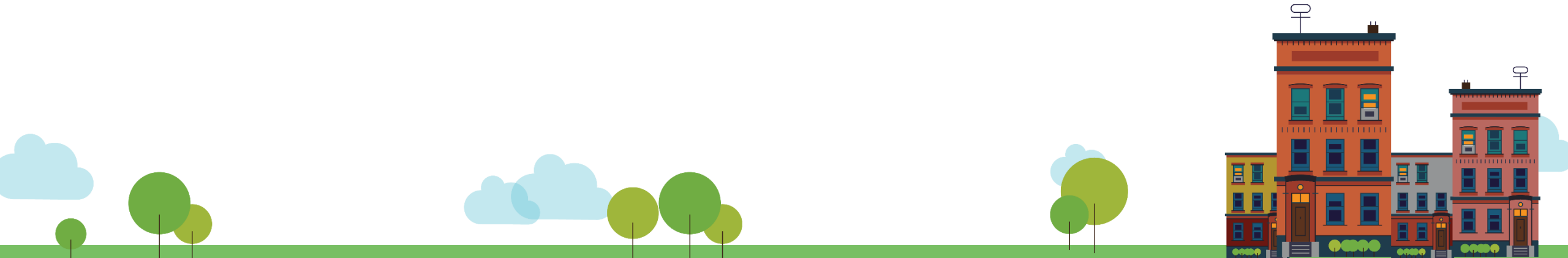
# Citywide Tree Canopy & Middle Housing

If the average tree canopy across Middle Housing zones and public rights-of-way grew to approximately **32%**, Tacoma could reach its **30%** tree canopy goal citywide.



# More Trees <sup>151</sup> AND Development

Addressing the housing crisis in tandem with a changing climate of more summer heat and winter rainfall requires allowing both development **AND** tree growth, rather than preferencing one at the expense of the other.



# But How?

**HOUSING**

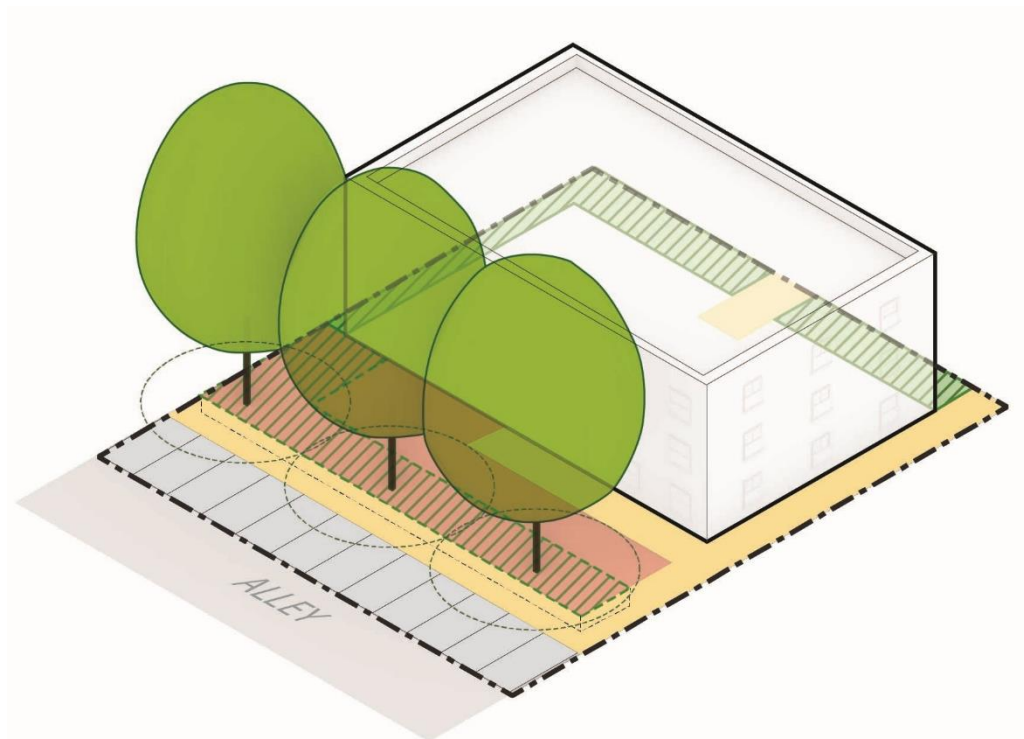
**TREES**

**PLANTING**

**AMENITY SPACE**

**PEDESTRIAN ACCESS**

**PARKING**



Code requirements need to balance many factors on each lot.



# Tacoma's Existing Code

## "Can't Miss" Code Improvements

- Tree requirements are currently confusing, dictated by both the Residential District Standards (tree canopy as a percentage of lot area) and Landscaping Code (relative to landscaped area).
- Tacoma does not currently require a permit for tree removal outside of critical areas. Retention of existing trees is critical to reaching tree canopy targets.
- Single, two and three family and townhouse developments are exempt from landscaping requirements. Future Urban Residential districts are critical to reaching Citywide tree canopy targets. Landscaping requirements, including street trees, should apply across all Middle Housing zones.

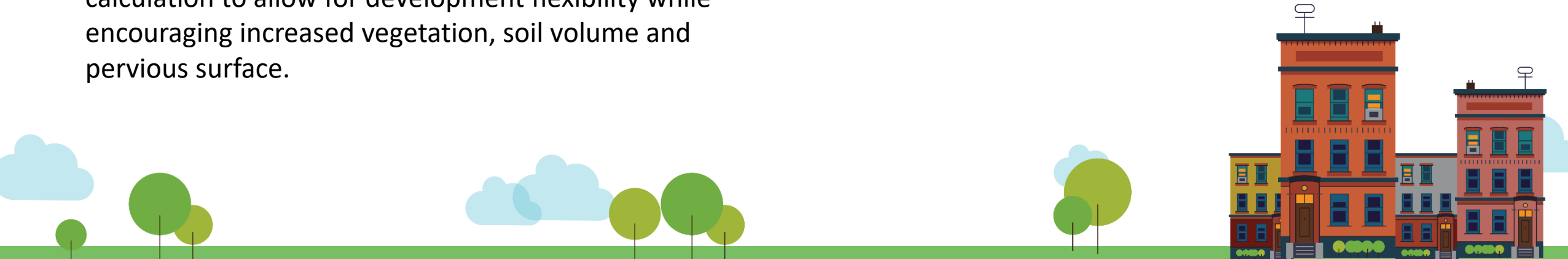
## Nuanced Opportunities

- Clearances and relative credits for small, medium, and large trees discourage planting of large trees, which provide the most real-world benefit toward heat island reduction and stormwater management.
- Requirements for minimum soil volume do not reach recommendations for long term tree health.



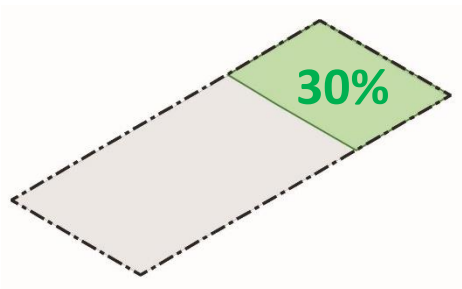
# Benchmarking: What Other Cities are Doing

- **Tree Preservation:** All benchmarked cities have permit requirements for tree removal - both associated with new development and not associated with new development.
- **Flexibility & Incentives for Tree Preservation:** Where tree preservation would limit development capacity, flexibility of development standards can allow by right development capacity (i.e. building setback reduction, height increase, impervious surface bonus, parking reduction, etc.)
- **Green Factor:** Multiple cities are using a Green Factor calculation to allow for development flexibility while encouraging increased vegetation, soil volume and pervious surface.
- **Soil Volume:** Out of all required soil volumes, Tacoma has the lowest of any benchmarked city. Seattle requires more than double the volume, and Eugene and Kirkland suggest or require (respectively) 7 times Tacoma's requirements.
- **Tree Clearances:** Clearances limit how far apart trees must be planted, and all benchmarked cities had smaller required clearances for large trees. Tacoma's larger clearances may be a factor in discouraging large tree planting.

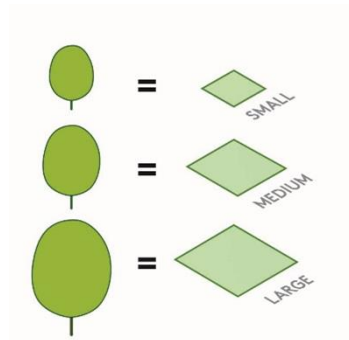


# Allowing Development <sup>155</sup> AND Trees is About Flexibility & Layering Where Possible

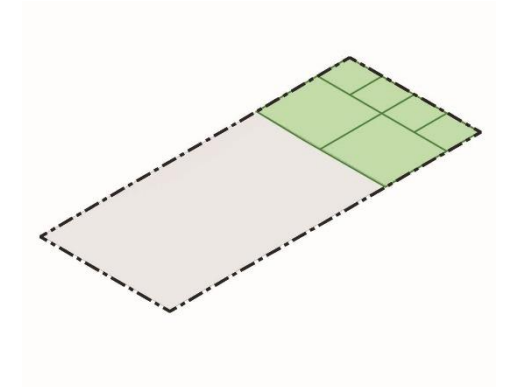
When 30% of the lot area is used to calculate tree requirements, what does this mean?



The percentage of lot area is used to determine how many trees or "tree credits" are required on a site.



Small, medium, and large trees are each worth a certain amount of credit toward this target area.

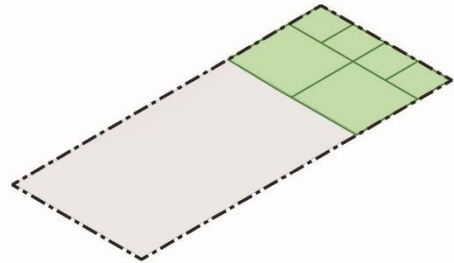


# Allowing Development <sup>156</sup> AND Trees is About Flexibility & Layering Where Possible

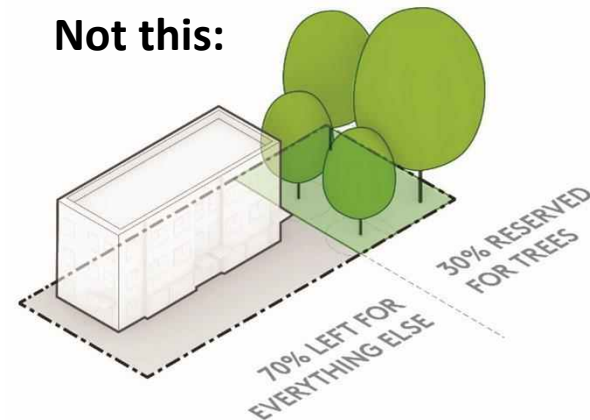
When 30% of the lot area is used to calculate tree requirements, what does this mean?

However, these tree canopies can overlap with paving, buildings, and extend beyond the lot.

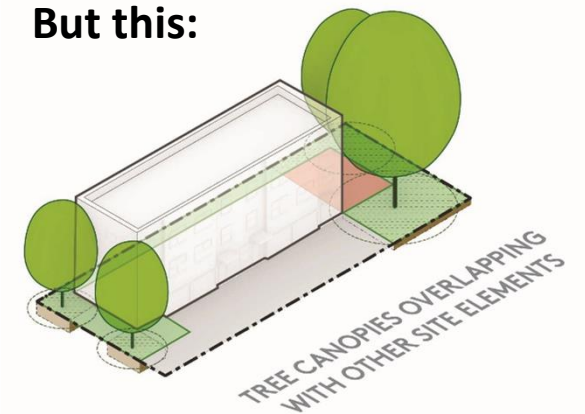
Structural soil cells can be used in constrained sites to provide soil for trees in the same place as driveways, parking, and paths.



**Not this:**



**But this:**

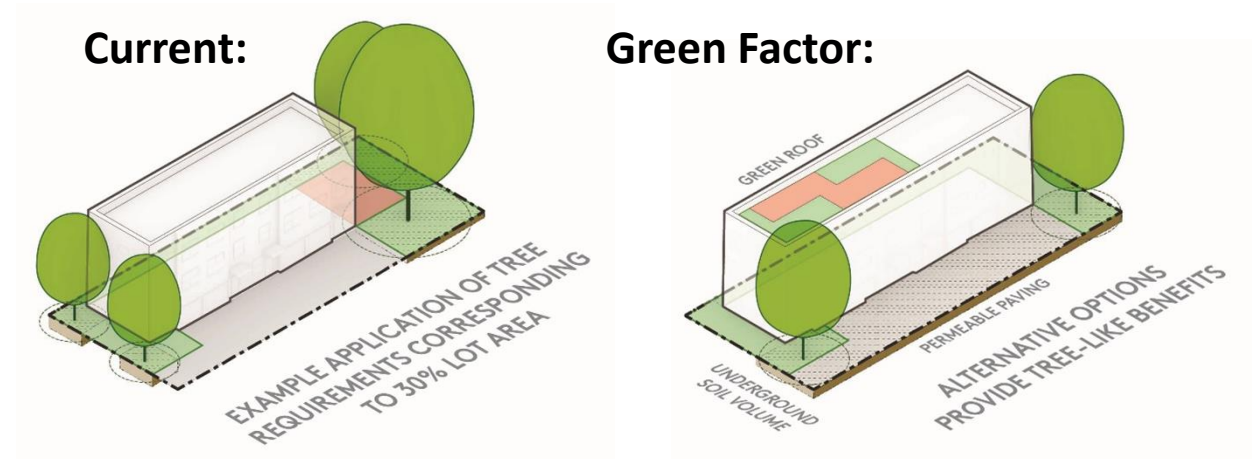


# Allowing Development <sup>157</sup> AND Trees is About Flexibility & Layering Where Possible

## Green Factor

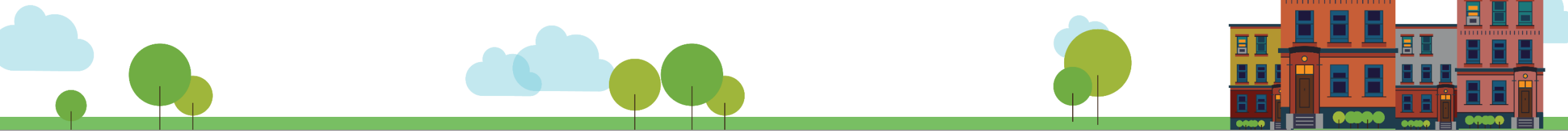
Master Builders like Seattle code's flexibility and want the tree code to be predictable.

Seattle and Kirkland use a Green Factor calculation that encourages trees as well as tree alternatives that provide like benefits (vegetation, soil volume and pervious surface). Developers complete a worksheet that combines relevant landscaping code in a single place for clarity and ease of use.



# Initial Approach to Test

- Tie tree requirements to:
    - 35% lot area for UR-1
    - 30% lot area for UR-2
    - 25% lot area for UR-3
  - Reduce tree clearances
  - Reduce credits for planting small trees
  - Increase soil volume requirements
  - Allow shared soil volume for multiple trees, with per tree minimum
- This combination would encourage more groves of large trees
- Require permit for tree removal both associated with and not associated with development
  - Require street trees for all Middle Housing developments. Can count toward lot coverage requirement if soil volume meets same requirements.
  - Consider post-planting follow up / require bonding (if staff capacity)



# Code Framework – Changes to Existing

## EXISTING

### 13.06 ZONING

Setbacks and Yard Areas

### 13.06.020 RESIDENTIAL DISTRICT STANDARDS

Tree Canopy Coverage (by zone)

### 13.06.090 SITE DEVELOPMENT STANDARDS

Landscaping Standards

- Trees Relative to Landscaped Area
- Tree Requirements (including Parking & Street Trees)

**URBAN FOREST MANUAL**

## POTENTIAL

### 13.06.020 BUILDING DESIGN STANDARDS

Amenity Space

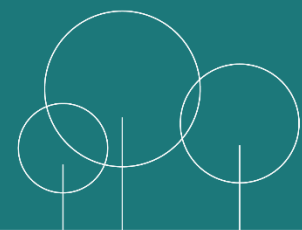
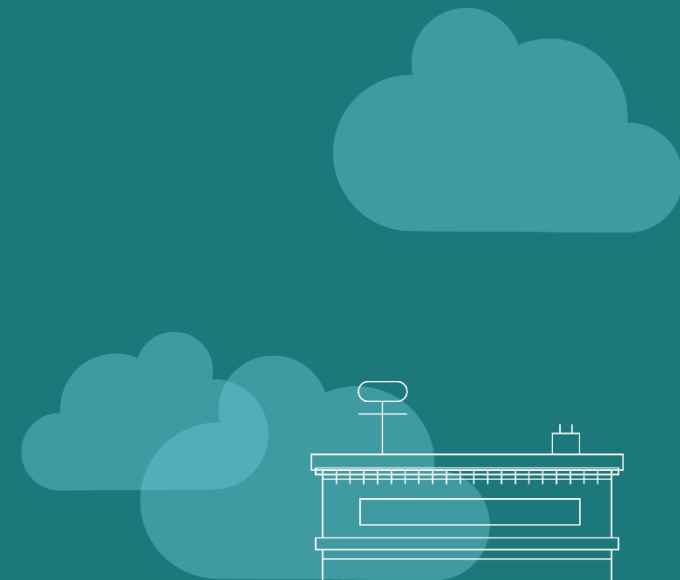
### 13.06.090 SITE DEVELOPMENT STANDARDS

Landscaping Standards

- Tree Canopy Coverage (by zone)
- Tree Requirements (including Parking & Street Trees)

**URBAN FOREST MANUAL**

# Benchmarking: Tree Retention





# Benchmarking: Tree Retention

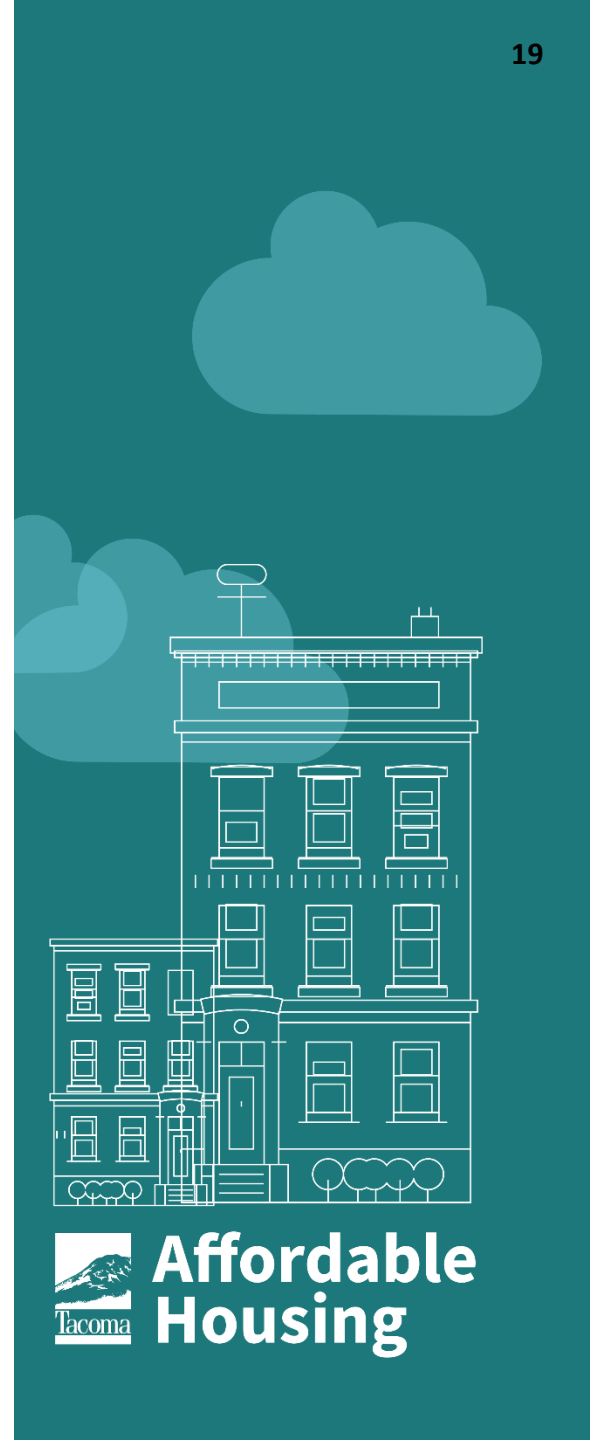
## → Related to Development Activity

Permit requirements for tree removal (outside of critical areas) are missing from Tacoma code

- All other benchmarked cities have permit requirements for tree removal associated with development.

Common permit exemptions include:

- Lot size (maximum tree removal on properties per year)
- Utilities and emergency removals
- Trees under 6" DBH
- Hazardous/dead/dying trees with arborist report
- Regulated invasive species



# Benchmarking: Tree Retention <sup>162</sup>

## → Related to Development Activity

### Eugene, OR

Permit required for **Significant Trees (≥8" DBH)**

Exceptions apply:

- Residential Lots <20,000 SF occupied by a single family dwelling
- Lots >20,000 SF removal up to 5 significant trees
- Hazardous Trees
- Dead, dying, diseased trees
- Fire abatement (designated by the fire marshal)

### Lakewood, WA

Permit required for **Significant Trees, Perimeter Trees and Interior Trees**

Exceptions apply:

- Damaged or Diseased Trees
- Safety hazards

Tree protection plan required for significant trees and any trees over 3" DBH that are protected for retention credit.

### Burien, WA

Permit required for **all trees greater than 6" DBH**

Exceptions apply:

- Trees less than 6" DBH
- Hazard trees
- Regulated invasive species

### Kirkland, WA

Permit required for **Regulated and Landmark trees**

Exceptions apply:

- Dead, dying, imminent hazard (with arborist report)



# Benchmarking: Tree Retention

## Related to Development Activity

**Seattle, WA**  
(New Tree Ordinance CB120534)

The removal or topping of the following trees is prohibited, except:

1. When development is proposed, in Neighborhood Residential, Lowrise, Midrise, Commercial, and Seattle Mixed zones:
  - a. Tier 1 trees may not be removed unless in emergency situations or unless they are hazardous
  - b. Tier 2 trees may not be removed except as permitted
  - c. Tier 3 and Tier 4 trees may be removed as part of a development permit.

Only 131 trees in Seattle are designated as Heritage trees

Tier 2, 3, 4: tree removal is part of the development permit process, tying it to lot coverage requirements.

<b>Table A for 25.11.050</b>	
<b>Tree related activities limited to removal and topping by tree category</b>	
<b>Tree category</b>	<b>During development – Part of a permit application</b>
Tier 1 Includes trees designated as <u>heritage trees</u>	May not be removed unless deemed hazardous or in need of emergency action with documentation required
Tier 2 <u>Includes trees 24 inches at DSH or greater, tree groves, and specific tree species as provided by Director’s Rule</u>	Approval for removal is part of overall development permit  Documentation required for hazardous and emergency actions
Tier 3 <u>Includes trees 12 inches at DSH or greater but less than 24 inches at DSH that are not considered Tier 2 trees as provided by Director’s Rule</u>	Approval for removal is part of overall development permit  Documentation required for hazardous and emergency actions
Tier 4 <u>Includes trees 6 inches at DSH but less than 12 inches at DSH</u>	Approval for removal is part of overall development permit
<u>Other trees (under 6 inches DSH)</u>	Not regulated, except as provided in subsection 25.11.050.C

# Benchmarking: Tree Retention <sup>164</sup> → Related to Development Activity

## Seattle, WA (New Tree Ordinance CB120534)

### Lowrise (& Midrise, Commercial and Seattle Mixed) zones

Tier 2 trees may be removed as follows:

a. If an otherwise allowable development area of 85 percent cannot be achieved without extending into the basic tree protection area, as follows:

- 1) Calculate the basic tree protection area on the lot.  
For the purposes of this subsection 25.11.070.B, the basic tree protection area cannot be modified.
- 2) Subtract the basic tree protection area and the area of any portions of the lot between a property line and basic tree protection area when the portion of the lot is 15 feet or less measured from a lot line to a basic tree protection area from the lot area. If this number is less than 85 percent of the total lot area, Tier 2 trees may be removed.
- 3) When multiple Tier 2 trees are located on a lot, the minimum number of trees needed to reach 85 percent may be removed based on the evaluation required by 8 subsection 25.11.060.C. 9
- 4) When the basic tree protection area of an off-site Tier 1, Tier 2, 10 or Tier 3 tree is located on the lot, this area shall be included in accordance with subsection 11 25.11.070.B.

Trees may be removed if the development doesn't reach 85% (previously 65%) lot coverage

<https://www.kuow.org/stories/developers-exerted-influence-on-seattle-s-tree-protection-ordinance>

<https://www.inww.org/2023/07/19/how-developers-helped-shape-seattles-controversial-tree-protection-ordinance/>

## Does Seattle's tree protection ordinance protect developers more than trees?

Libby Denkmann & Hans Anderson  
July 24, 2023 / 4:48 pm



# Benchmarking: Tree Retention

## → Not Related to Development Activity

### Cities differ in regulations of tree removals not associated with development

- Eugene & Burien: same standards as tree removal associated with development
- Kirkland: maximum removals per year based on lot size, provided preserved tree threshold is met, and replacement trees are planted.
- Lakewood: maximum removals per year based on lot size. Replacement not required if within allowable limits. Single-family lots under 10,000 sf are exempt.
- Seattle: maximum removals by tree type per 1 or 3 years based on zoning.
  - Neighborhood Residential, Lowrise, Midrise: When no development proposed, no more than two Tier 4 trees (in a 3 year period) may be removed on developed lots



**Affordable  
Housing**

# Benchmarking: Tree Retention<sup>166</sup>

## → Not Related to Development Activity

### Eugene, OR

Permit required for **Significant trees**

Exceptions apply:

- Residential Lots <20,000 SF occupied by a single family dwelling
- Lots >20,000 SF removal up to 5 significant trees
- Hazardous Trees
- Dead, dying, diseased trees
- Fire abatement (designated by the fire marshal)

### Kirkland, WA

Permit required for **Regulated and Landmark trees**

Exceptions apply:

- Dead, dying, imminent hazard (with arborist report).
- ≤10,000SF lots, max 2 regulated trees may be removed as long as min of 2 regulated trees remain.
- 10,001 - 20,000 SF lots max 3 regulated trees may be removed as long as min of 3 regulated trees remain.
- ≥20,001 SF lots max 4 regulated trees may be removed as long as min of 4 regulated trees remain.
- Replacement planting required for all removals of Regulated Trees

### Burien, WA

Permit required for **all trees greater than 6" DBH**

Exceptions apply:

- Minor tree removal with permit
- If removal will result in lot dropping below minimum tree density threshold
- All significant and exceptional trees on an undeveloped lot shall be retained.

### Lakewood, WA

Permit required for **Significant Trees**

Three options for tree replacement for significant tree removal

- Based on DBH size:
  - 2:1 diameter inches
- Based on Canopy Coverage:
  - Planted trees will compensate 1:1 for lost canopy when they reach maturity, according to arborist report
- Based on CO2 deductions:
  - Arborist report showing carbon sequestration value of trees (iTree used to confirm)

Permit required for removal of **Heritage Trees**

City staff and an ISA certified arborist shall evaluate any heritage trees prior to a decision on the removal permit. Permit approval will be granted if an arborist report demonstrates that alteration or removal is necessary for health and safety, infrastructure operation, protection of existing buildings, or to accomplish reasonable use of property per state law. Recommendations for care, other than removal, will be considered



# Benchmarking: Tree Retention <sup>167</sup>

## Not Related to Development Activity

Seattle, WA

(New Tree Ordinance CB120534)

### When no development is proposed:

The removal or topping of the following trees is prohibited, except as provided in 10 Section 25.11.020 and as performed in accordance with Sections 25.11.030 and 25.11.040:

Tier 1, Tier 2, Tier 3, and Tier 4 trees on undeveloped lots in all zones ,

Tier 1, Tier 2, Tier 3, and Tier 4 trees on developed lots in all zones, except as allowed in subsection 25.11.050.B

No more than **two Tier 4 trees may be removed in any three-year period** on developed lots in Neighborhood Residential, Lowrise, and Midrise, and no more than **three Tier 3 and Tier 4 trees** may be removed on developed lots in any one-year period in all other zones.

In addition to the tree removal allowances in subsection 25.11.050.B, the Director may authorize removal and replacement of a Tier 3 tree, or removal of a Tier 4 tree, from developed lots in Neighborhood Residential, Lowrise, Midrise, commercial, and Seattle Mixed zones when removal is needed because the tree is causing obvious physical damage to building foundations or utility infrastructure, where continued or additional damage cannot be avoided through actions other than removal.

Only 131 trees in Seattle are designated as Heritage trees

Seattle's new amendment has allowed removal for Tier 3 and 4 trees based on zoning

<b>Table A for 25.11.050</b>	
<b>Tree related activities on developed lots including but not by tree category</b>	
<b>Tree category</b>	<b>Not part of a permit application<sup>1</sup></b>
Tier 1 Includes trees designated as <b>heritage trees</b>	May not be removed unless deemed <b>hazardous</b> or in need of <b>emergency action with documentation required</b>
Tier 2 Includes trees 24 inches at DSH or greater, tree groves, and specific tree species as provided by Director's Rule	May not be removed unless deemed <b>hazardous</b> or in need of <b>emergency action with documentation required</b>
Tier 3 Includes trees 12 inches at DSH or greater but less than 24 inches at DSH that are not considered Tier 2 trees as provided by Director's Rule	May not be removed unless deemed <b>hazardous</b> or in need of <b>emergency action with documentation required, except as provided in subsections 25.11.050.B and 25.11.050.C</b>
Tier 4 Includes trees 6 inches at DSH but less than 12 inches at DSH	May not be removed unless deemed <b>hazardous</b> or in need of <b>emergency action with documentation required, except as provided in subsections 25.11.050.B and 25.11.050.C</b>
Other trees (under 6 inches DSH)	Not regulated, except as provided in subsection 25.11.050.C

Footnote to Table A for 25.11.050

<sup>1</sup> For standards related to undeveloped lots, see subsection 2

# Benchmarking: Tree Retention Comparison

TREE PRESERVATION THRESHOLDS						
	Tacoma, WA	Eugene, OR	Kirkland, WA	Burien, WA	Lakewood, WA	Seattle, WA
Permit Requirements for Tree Removal Associated with Development Exemptions	N/A; except in critical areas	Significant trees (8" DBH or more) Residential Lots <20,000 SF occupied by a single family dwelling up to 1 tree Lots >20,000 SF removal up to 5 significant trees Hazardous Trees Dead, dying, diseased trees Fire abatement (designated by the fire marshal)	Regulated trees (6" DBH or more) and Landmark Trees (26" or more) Dead, dying, imminent hazard (with arborist report).	All trees 6" DBH or greater Major tree removal permit Tree protection plan Tree replacement plan Hazard trees Regulated invasive species	Significant trees (9" DBH or greater), perimeter trees, and interior trees Damaged or diseased trees Safety Hazards	Tier 1, 2, 3 and 4 trees defined in new ordinance Emergency actions Hazardous (Tier 1, 2 and 3 require replacement) Replanting & payment in lieu with development by permanent supportive housing providers Per arborist's recommendation, with Director's approval Tree work to comply with ADA Removal of invasive/nuisance trees Removal of Tier 3 and 4 trees that were initially overplanted, with Director's approval & final canopy of at least 40%
Permit Requirements for Tree Removal Not Associated with Development Exemptions	N/A; except in critical areas	Significant trees (8" DBH or more) Same as above	Regulated and Landmark trees Dead, dying, imminent hazard (with arborist report). ≤10,000SF lots, max 2 regulated trees may be removed as long as min of 2 regulated trees remain. 10,001 - 20,000 SF lots max 3 regulated trees may be removed as long as min of 3 regulated trees remain. ≥20,001 SF lots max 4 regulated trees may be removed as long as min of 4 regulated trees remain. Replacement planting required for all removals of Regulated Trees	All trees greater than 6" DBH Minor tree removal permit If removal will result in lot dropping below minimum tree density threshold All significant and exceptional trees on an undeveloped lot shall be retained. Same as above	Significant trees & Heritage trees Max Tree Removal on Developed Properties Max # of significant trees allowed to be removed in 1 / 5 years Lots 10,001 to 30,000 sq. ft. 2 / 4 Lots 30,001 sq. ft. or greater 4 / 8 SF lots under 10,000 sf are exempt from tree preservation requirements	Neighborhood Residential, Lowrise, Midrise: When no development proposed, no more than two Tier 4 trees (in 3 yr period) may be removed on developed lots All other zones: no more than three Tier 3 and Tier 4 trees may be removed on developed lots (in 1yr period) Same as above
Heritage / Significant Tree Definitions	N/A	Heritage Trees: tree of exceptional value based on size (relative to species), history, location, or species. No disturbance of more than 30% critical root zone 2 replacement trees required for each significant tree lost	Landmark Trees	Heritage trees; Significant Trees: 6"-29"; Exceptional Trees: 30"+; Some smaller exceptional trees by species in table	Any evergreen or deciduous tree 9"+, or Oregon White Oak trees with 4" min DBH, or tree of any diameter determined significant by Director (unique species, habitat function)	Exceptional trees: Per species, based on Director's Rule 16-2008; A grove (excludes street trees or hazardous trees): 8 or more trees 12" DSH or more that form a continuous canopy
Replacement		2 replacement trees required for each significant tree lost	For each tree 6-15" DBH, 1 replacement tree; for each tree 16-26" DBH, 2 replacement trees; for each tree 26" DBH, 3 replacement trees. Minimum 1:1 replacement for R.O.W. removals.	Required on site if significant or exceptional trees are removed to meet min required tree credits. 3:1 replacement for healthy exceptional trees removed.	Replacement not required if within allowable removals per year	All Tier 1, 2, and 3 removals require replacement proportional to canopy lost, per Director. Replacement trees count toward Green Factor.



# Benchmarking: Tree Retention

## Flexibility & Incentives

to meet development allowances

to exceed development allowances

### City of Lakewood, WA has a comprehensive Tree Preservation “Incentive” program.

- Parking requirement reduction
- Density increase for multifamily uses
- Master plan flexibility for new developments
- Landscaping reduction for Oregon White Oak preservation
- Building setback reduction
- Impervious surface bonus

Though it is called an “Incentive Program,” Lakewood’s code primarily offers flexibility to meet (not exceed) development allowances in order to retain trees

### Seattle offers flexibility for retaining Tier 2 trees, reduction in new tree requirements with ADUs, and both flexibility & incentives for affordable housing

Up to 100% for affordable housing, 75% for other developments:

- Building setback reduction
- Increases in height, width and depth to account for area lost to tree protection
- Reduction in amenity area, landscaping and screening requirements

Seattle offers flexibility and incentives for Tier 2 tree retention



**Affordable Housing**

# Benchmarking: Tree Retention<sup>170</sup>

## Flexibility & Incentives

to meet development allowances      to exceed development allowances

### Lakewood, WA has a comprehensive Tree Preservation “Incentive program”

(LMC 18A.70.320: Tree Preservation Incentives)

**Parking Reduction:** Credit for preservation of significant or heritage trees. For every significant tree and/or heritage tree preserved within the property, the required number of parking spaces may be reduced by one-half (0.5) spaces, provided the total reduction does not exceed five (5) percent of the total required parking spaces, when combined with all parking incentive credits.

**Density increase:** For multifamily uses, maximum density may increase by one (1) unit for each significant tree preserved on a property that is located in the Downtown District (not to exceed more than twenty (20) percent of the total allowable units). For multifamily use types, maximum density may increase by one (1) unit for each significant tree preserved on a property that is located in a census tract with a tree equity score of under the City's 2018 average score of sixty-nine (69) (not to exceed more than twenty (20) percent of the total allowable units).

**Master plan flexibility for new developments:** Master planned development allows flexibility and variation design as long as there is a net benefit to the City. Significant and heritage tree preservation shall be included as a benefit under the master planned development required net benefit findings.

**Landscaping reduction for Oregon White Oak preservation:** A credit of one and one-half (1.5) square feet of vegetative buffer shall be given for every square foot of area devoted to new or the preservation of Oregon white oak tree use.

**Building setback reduction:** The Director may reduce a rear yard and/or side yard building setback to compensate for significant or heritage tree preservation; provided, that the setback is not reduced more than five (5) feet, is no closer to the property line than three (3) feet, is the minimum reduction required for tree preservation.

**Impervious surface bonus:** The Director may increase the amount of allowable impervious surface by five (5) percent to compensate for the preservation of a significant or heritage tree.

# Benchmarking: Tree Retention <sup>171</sup>

## Flexibility & Incentives

to meet development allowances      to exceed development allowances

### Seattle has code flexibility for “Tree protection on sites undergoing development”

(SDCI 25.11.060, 25.11.070, 25.11.080)

#### Neighborhood residential zones

**Permitted extension into front or rear yards** shall be limited to an area equal to the amount of the tree protection area not located within required yards. The maximum projection into the required front or rear yard shall be 50 percent of the yard requirement.

If the maximum lot coverage permitted on the site can be achieved without extending into either the tree protection area or required front and/or rear yards, then no such extension into required yards shall be permitted.

**Trees over 2 feet in diameter** measured 4.5 feet above the ground shall be identified on site plans. In order to protect such trees, an applicant may modify their development proposal to extend into front and/or rear yards in the same manner as provided for exceptional trees in subsection 25.11.060.A.

#### Midrise and Commercial zones

**Trees over 2 feet in diameter** measured 4.5 feet above the ground shall be identified on site plans. In order to protect such trees, an applicant may modify their development proposal to extend into front and/or rear yards in the same manner as provided for exceptional trees in subsection 25.11.060.A

#### Lowrise zones

**Exceptional tree:** In order to preserve an exceptional tree, the following code modifications are allowed:

- a. **Permitted height.** For a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of subsection 23.45.514.D, the Director may permit the ridge of a pitched roof with a minimum slope of 6:12 to extend up to a height of 50 feet if the increase is needed to accommodate, on an additional story, the amount of floor area lost by avoiding development within the tree protection area and the amount of floor area on the additional story is limited to the amount of floor area lost by avoiding development within the tree protection area.
- b. **Parking reduction.** A reduction in the parking quantity required by Section 23.54.015 and the standards of Section 23.54.030 may be permitted in order to protect an exceptional tree if the reduction would result in a project that would avoid the tree protection area.

#### Trees over 2 feet in diameter

- In order to protect trees over 2 feet in diameter, an applicant may request and the Director may allow modification of development standards in the same manner and to the same extent as provided for exceptional trees in subsection 25.11.070.A.

### And Affordable housing Incentive programs

SDCI 23.58 Incentive Provisions

Subchapter V: Provisions for Extra Residential and Nonresidential Floor Area

**Bonus floor area for open space amenities:** Voluntary agreements for amenities. Where expressly permitted by the provisions of the zone, an applicant may achieve bonus floor area in part through a voluntary agreement for provision of amenities to mitigate impacts of the development, subject to the limits in this Chapter 23.58A.1. Except where limited in the provisions of the zone, amenities that may be provided for bonus floor area include:

- a. Neighborhood open space;
- b. Green street setbacks on lots abutting designated green streets;
- c. Green street improvements;
- d. Mid-block corridor; and
- e. Hillside terrace.

**Bonus ratio.** Unless otherwise specified in the provisions of the zone, amenities may be used to gain bonus floor area according to the following ratios and subject to the limits of this Section 23.58A.040:

- a. For a neighborhood open space, 7 square feet of bonus floor area per 1 square foot of qualifying neighborhood open space area (7:1).
- b. For a green street setback, 5 square feet of bonus floor area per 1 square foot of qualifying green street setback area (5:1).
- c. For a green street improvement, 5 square feet of bonus floor area per 1 square foot of qualifying green street improvement area (5:1).
- d. For a mid-block corridor, 7 square feet of bonus floor area per 1 square foot of qualifying mid-block corridor area (7:1).
- e. For a residential or non-residential hillside terrace, 5 square feet of bonus floor area per 1 square foot of qualifying hillside terrace area (5:1).

#### Standards for neighborhood open space

A minimum of 35 percent of the open space shall be landscaped with grass, ground cover, bushes, and/or trees.

Payment-in-lieu of providing neighborhood open space

# Benchmarking: Tree Retention <sup>172</sup>

## Flexibility & Incentives

to meet development allowances      to exceed development allowances

	Tacoma, WA	Eugene, OR	Kirkland, WA	Burien, WA	Lakewood, WA	Seattle, WA
Increase in impervious surface allowed					Increased impervious surface allowed (5%)	
Reduced setbacks					Reduction in setback requirements (up to 5'), no closer than 3' to property line	If max. lot coverage not achievable, development can extend up to 50% into required front or rear yard (= area of tree protection not located in required yards). Setbacks reduced by 75% max for tier 2 retention (100% for affordable housing)
Reduction in new trees or landscaped area required	1 req. tree per retained tree of equal size; 2 req. trees per retained tree 8"-20" DBH; 3 req. trees per retained tree 20"-32" DBH; 4 req. trees per retained tree >32" DBH	For each preserved tree, relieved from planting 2 required trees; For each sf root area preserved, relieved of 2sf required planting area	Tree credits by DBH preserved to meet 50 credit per acre req. (3-5" = 0.5; 6-10" = 1; ... 30"+ = 11)	Min. tree credit density (existing + new) for Middle Housing: 1 tree credit per 1,000 sf	1.5 sf of vegetative buffer reduction per sf area devoted to new / preserved Oregon White Oaks	ADU incentive: if lot does not have required tree caliper when ADU plans submitted, only 2 new caliper inches required. Amenity areas landscaping & screening reduced 75% max.
Reduction in required parking					1/2 space reduction for each significant / heritage tree preserved (to 5% of total spaces reduced max. when combined with all parking incentive credits)	
Increased density or allowable height / width					Multifamily in Downtown District or census tract with tree equity score <69 (City's Average): 1 unit additional density per significant tree preserved (20% allowable units max increase)	Lowrise: 10' height increase if additional story is needed to accommodate floor area lost to tree protection. Structure width, depth, façade lengths increased 30% max.

# Benchmarking: Tree Retention

## Tree Encroachment

**Some Cities define the maximum encroachment within a tree protection radius to balance tree retention & development.**

### Seattle

- No encroachment within 1/2 of tree protection radius
- Existing encroachments may remain or be replaced if no damage would result.
- Tree protection area (drip line) cannot be reduced more than 35% without arborist-approved alternative method

### Lakewood

- No hard surface under White Oak dripline, but up to 25% allowed if no alternative

### Burien:

- Grading impacts allowed within up to 25% of critical root zone
- Other disturbance allowed to 3" max. depth



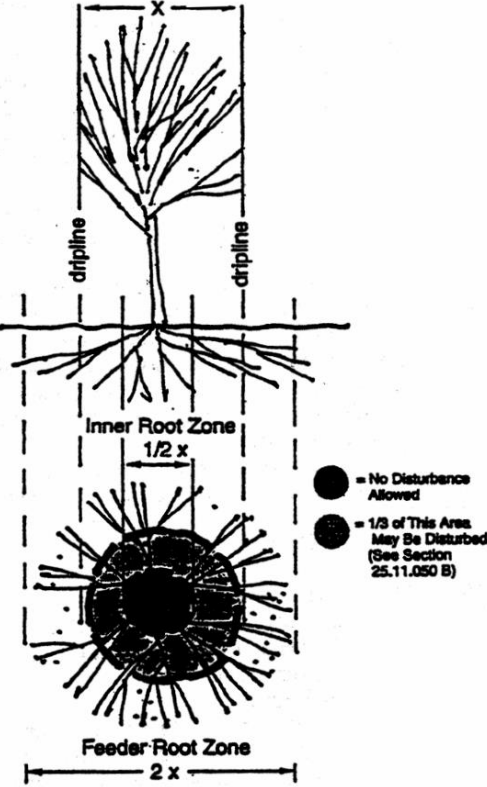
**Affordable  
Housing**

# Benchmarking: Tree Retention

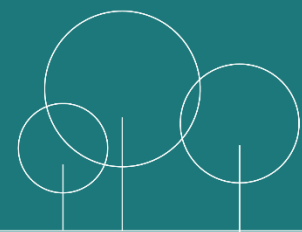
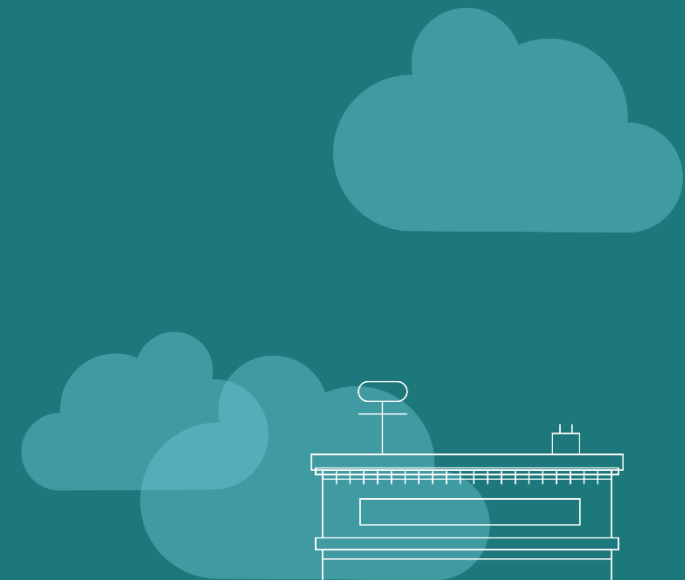
## Tree Encroachment

### TREE ENCROACHMENT

Tacoma, WA	Eugene, OR	Kirkland, WA	Burien, WA	Lakewood, WA	Seattle, WA
For required landscape, no construction within tree protection zone (the greater of CRZ & dripline) without prior City approval			Includes definition for "Inner Critical Root Zone" = 1/2' per inch DBH. Grading impacts can be up to 25% of critical root zone if professional determines it will not impact the health and structure of the tree. Other disturbance allowed at max. 3" depth, no compaction.	Construction outside CRZ and away from trees as practically possible. No roots greater than 4" shall be cut, even if outside CRZ. No hard surface under dripline of Oregon White Oak as possible; up to 25% within dripline if no alternative and with TPP by arborist.	No encroachment closer than 1/2 tree protection radius. Tree protection cannot be reduced more than 35% without arborist approved method.



# Benchmarking: Landscaping Code



**Affordable  
Housing**

# Benchmarking: Landscaping Code

## New Trees

### New tree requirements are commonly:

- Tied to lot area
- Based on a landscape type, with requirements per type defined by zone
- Based on Green Factor / scorecard in combination with other factors

### Soil volumes and clearances:

- Important factor in tree selection and long-term benefit
- Tacoma has the lowest volume requirements



**Affordable  
Housing**



# Benchmarking: Landscaping Code

## New Trees

TREE TYPOLOGIES, PLANTING AREAS & SOIL						
	Tacoma, WA	Eugene, OR	Kirkland, WA	Burien, WA	Lakewood, WA	Seattle, WA
Requirement	15%-30% lot area based on zone	New trees tied to new parking only	50 tree credits per acre	1 tree credit / 1,000 sf developable land	Based on landscape type (buffer / streetscape / open space / solid barrier / area screening) applied to zones	Green Factor score of 0.3+ for development with > 4 units
Allocation of tree credit	Small: 300 sf; Medium: 500 sf; Large: 1,000 sf	Canopy vs. understory	DBH 6"-10" = 1 tree credit, +1 credit for additional 2" DBH; Draft code: 20 sf per inch DBH, min. 6" DBH	Existing Trees: by DBH; New trees: 2" cal deciduous / broadleaf = 1 credit; 6' evergreen conifer = 2 credits		
Tree Planting Area Requirements	Small: 4' x 6' Medium: 5' x 8' Large: 6' x 10'	Defined by species				5.5' min. width
Tree Planting Soil Volume Requirements	Required: Small: 72 cu ft Medium: 120 cu ft Large: 180 cu ft	Suggested: Small: 600 cu ft Medium: 1000 cu ft Large: 1500 cu ft	Draft Amendment: Small: 500 cu ft Medium: 1000 cu ft Large: 1500 cu ft			Street Trees: 1,200 cu ft per tree; Container trees: S: 150 cu ft; S/M: 250 cu ft; M/L 400 cu ft; L: 550 cu ft
Tree Clearances	From other trees: Small: 10' Medium: 25' Large: 40'	From other trees: Small: 20' Medium: 25' Large: 30'				From other trees: Small: 10' S/M: 14' Medium: 18' Large: 22'

New tree requirements, planting area, soil, and clearances summary

# Benchmarking: Landscaping Code <sup>176</sup>

## Tools to Define Landscaping Standards

**Different Cities use different combinations of tools to define requirements for planted areas, trees, and yard space.**

- **New tree requirements tied to total lot area:**
  - Tree canopy as % of lot area, met with small, medium and large trees
  - XX “tree credits” required per XX square feet of lot area
- **Landscaped Area tied to total lot area:**
  - Trees/understory often defined through designated landscape types
- **Yard/Amenity Space:**
  - Defined by % of lot area, sf per cottage/carriage house, or % gross floor area of structure
  - Defined by front, rear and side setbacks per zone
- **Pervious / Impervious:**
  - Maximum allowable % impervious surface defined by zone



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# Benchmarking: Landscaping Code

## Tools to Define Landscaping Standards

LANDSCAPING STANDARDS SUMMARY

	Tacoma, WA	Eugene, OR	Kirkland, WA	Burien, WA	Lakewood, WA	Seattle, WA
Tree Canopy	R-3: 30%; R-4 L: 30% R-4:20% R-5: 15%		Tree density for SF, duplex, triplex, cottage, ADUs: 50 tree credits / acre  Credits per draft Green Factor	Single-Family: 1 tree credit per 1,000sf of developable land Multi-Family: 1 tree credit per 1,000sf of developable land		Integrated into Green Factor calculations
Landscaping Area	5% in residential districts		Requirements per landscape category apply	Landscaping types applies per zone	Landscaping types applies per zone	Integrated into Green Factor calculations
Usable Yard/Amenity Space	Single family: 10% of lot Duplex/Triplex: 400 sf/du or 10% of lot Townhouse: 300sf private & 100sf common/du Multifamily: 20% (35% of that common) Setbacks: 20'-25' (front), 5'-7.5' (side), 25' (rear)	R-2, R-3, R-4: 20% of lot 10% of lot for middle housing	RS, RX, RSA: 20' front yard, 5/15' side yard, 10' rear yard  RM, RMA: 20' front yard, 5' side yard, 10' rear yard		R1-3 zone: 25' - 10' MR1-3 zone: 5' MF1-3 zone: 15'	Setbacks for NR zones: Front yard: 20' or average of structures on either side (lower #) for NR1, NR2, NR3 10' for RSL Rear Yard: 25' or 20% lot depth (lower #) to 10' min for NR; 10' (or none if along alley) for RSL Side yard: 5' for NR and RSL Amenity Space for Lowrise Residential: 25% of lot area (townhouses); 300 sf min. per cottage, 150 sf per carriage house (cottage housing in MF zones); and 5% gross floor area of structure (midrise)
Pervious / Impervious				Single Detached Dwelling Unit: RS-A zone: 20%, RS-12,000 zone: 45%, RS-7 200 zone: 70% Residential zones: Townhouse Dwelling Unit: 85%RM-48 zone, 90% Apartment Dwelling Unit: 85% Mixed Use: 85%	R1-3 zone: 45 - 60% M1-3 zone: 70- 75% Mf1-3 zone: 70%  5% Additional impervious allowed for tree preservation	

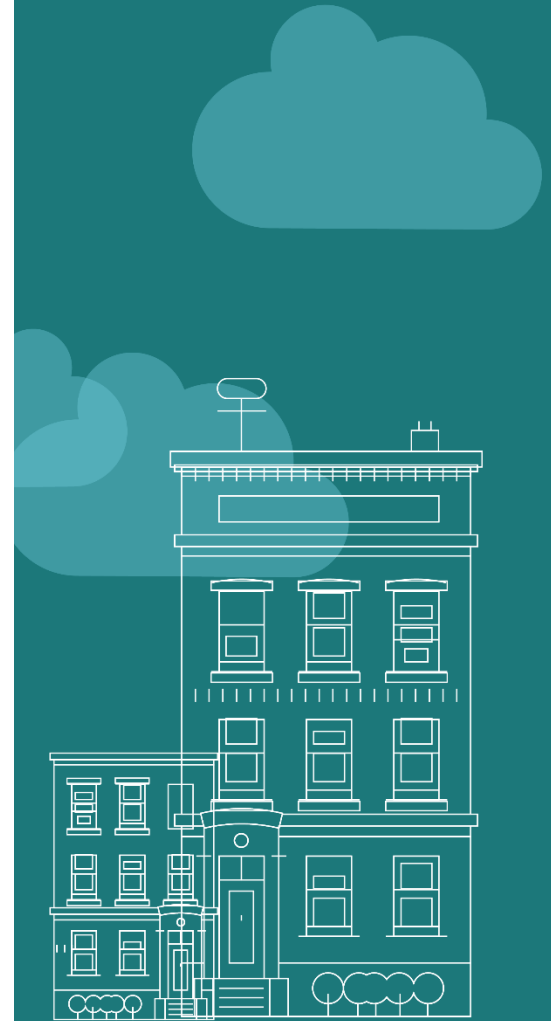


# Benchmarking: Landscaping Code

## Street Trees

**Approximately 1 street tree per 30 linear feet is the average requirement across the benchmarked Cities.**

- Defined by tree type required per X linear feet of street frontage
- Eugene and Burien provide additional requirements based on street classification
- Seattle and Tacoma allow trees on private property adjacent to right-of-way to count as street trees



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# Benchmarking: Landscaping Code

## Street Trees

STREET TREES						
	Tacoma, WA	Eugene, OR	Kirkland, WA	Burien, WA	Lakewood, WA	Seattle, WA
Trees per linear ft	4 small, 3 medium, or 2 large per 100 lf	1 tree per 30 lf. On arterial/collectors: 2 canopy trees per 100lf; 5 understory trees per 100 lf		By street type: Neighborhood Collector: 1 / 50 lf; Arterial: 1 / 40 lf	1 tree per 30 lf, or to match existing pattern of street, whichever is less	Number and type by Director & SDOT
If not feasible in right-of-way	Count within 10' of property line					Count within 5' of property line

Tacoma tree clearances defined as standard for all trees:

**MINIMUM TREE SETBACKS (AT PLANTING):**

Centerline of tree to centerline of:	
Street corner (extension of outside face of curb)	25'-0"
Stop or yield sign	25'-0"
Utility pole	15'-0"
Other traffic control sign	5'-0"
Centerline of tree to edge of:	
Driveway	5'-0"
Face of curb	2'-6"
Pavement	2'-0"
Edge of tree to edge of:	
Utility worker access lids	5'-0"
Gas shutoff valves	5'-0"
Fire hydrant & hydrant branch	10'-0"
Water meter, water service & water mains	5'-0"
Storm inlet, cb, & manhole	5'-0"
Storm/sanitary service connections & mains	5'-0"

Street tree planting distances from Eugene Urban Forestry defined by size of tree:

Street Tree Planting Distances			
Mature Tree Canopy Size-	Small (up to 35' ht)	Medium (35' to 60' ht)	Large (over 60' ht)
Feature	Distance from Feature		
Street trees	20'	25'	30'
Alleys	15'	15'	15'
Sidewalks	2'	3'	4'
Driveways	5'	5'	10'
Fire hydrants	5'	5'	5'
Intersections	35'	35'	35'
Manholes and catch basins	5'	10'	10'
Water meters	5'	5'	5'
Utility boxes	5'	5'	5'
Utility poles	5'	10'	10'
Street lights	15'	20'	25'
Stop signs	25' or more if necessary		
Regulatory signs	Not to block sign		

# Benchmarking: Landscaping Code

## Stormwater

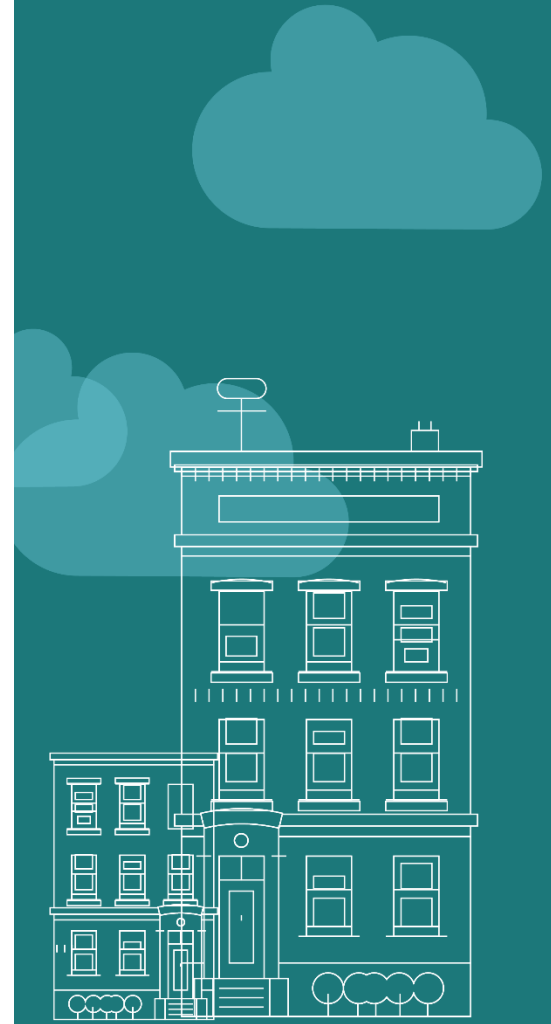
**Of the benchmarked Cities, three tied tree preservation to stormwater.**

**City of Lakewood WA has an impervious surface bonus.**

The Director may increase the amount of allowable impervious surface by 5 percent to compensate for the preservation of a significant or heritage tree.

**Seattle & Kirkland Green Factor**

Acknowledges the benefits of trees in stormwater management by combining them into a single calculation.



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# Benchmarking: Landscaping Code

## Green Factor

**Seattle and Kirkland have Green Factor systems to implement landscaping requirements and incentives. Green Factor provides the ability to create a cooler and more biodiverse city through increased vegetation, soil volume, and perviousness.**

### Seattle

Seattle requires a Green Factor score of 0.6 for developments of at least one unit in Lowrise zones, and 0.5 in Midrise zones.

Alternative “bonus” credits can contribute to minimum score.

Design by landscape architect not required for developments with less than 10 units.

### Kirkland

All new developments within Station Area Boundary required to reach score of 0.4.

Bonus height allows with Green Factor score of at least 0.75



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# Benchmarking: Landscaping Code

## Seattle Green Factor

Seattle Green Factor: Landscaping that achieves a Green Factor score of **0.6 or greater** is required for any lot within a **Lowrise zone** if construction of more than one new dwelling unit.

Landscaping that achieves a Green Factor score of **0.5 or greater** is required for any lot within a **Midrise zone** if construction of more than one new dwelling unit.

Revised 12/28/10

### Green Factor Score Sheet

SEATTLE *green factor*

		enter sq ft of parcel			
		Parcel size (enter this value first)	19,993	SCORE 0.402	
Landscape Elements**		Totals from GF worksheet	Factor	Total	
<b>A Landscaped areas (select one of the following for each area)</b>					
1	Landscaped areas with a soil depth of less than 24"	enter sq ft 1325	0.1	133	
2	Landscaped areas with a soil depth of 24" or greater	enter sq ft 2772	0.6	1,663.2	
3	Bioretention facilities	enter sq ft 0	1.0	-	
<b>B Plantings (credit for plants in landscaped areas from Section A)</b>					
1	Mulch, ground covers, or other plants less than 2' tall at maturity	enter sq ft 0	0.1	-	
2	Shrubs or perennials 2'+ at maturity - calculated at 12 sq ft per plant (typically planted no closer than 18" on center)	enter number of plants 509	6108	0.3	1,832
3	Tree canopy for "small trees" or equivalent (canopy spread 8' to 15') - calculated at 75 sq ft per tree	enter number of plants 3	225	0.3	68
4	Tree canopy for "small/medium trees" or equivalent (canopy spread 16' to 20') - calculated at 150 sq ft per tree	enter number of plants 0	0	0.3	-
5	Tree canopy for "medium/large trees" or equivalent (canopy spread of 21' to 25') - calculated at 250 sq ft per tree	enter number of plants 3	750	0.4	300.0
6	Tree canopy for "large trees" or equivalent (canopy spread of 26' to 30') - calculated at 350 sq ft per tree	enter number of plants 1	350	0.4	140.0
7	Tree canopy for preservation of large existing trees with trunks 6"+ in diameter - calculated at 20 sq ft per inch diameter	enter Inches DBH 58	1160	0.8	928.0
<b>C Green roofs</b>					
1	Over at least 2" and less than 4" of growth medium	enter sq ft 0	0.4	-	
2	Over at least 4" of growth medium	enter sq ft 3840	0.7	2,688.0	
<b>D Vegetated walls</b>					
		enter sq ft 0	0.7	-	
<b>E Approved water features</b>					
		enter sq ft 0	0.7	-	
<b>F Permeable paving</b>					
1	Permeable paving over at least 6" and less than 24" of soil or gravel	enter sq ft 0	0.2	-	
2	Permeable paving over at least 24" of soil or gravel	enter sq ft 0	0.5	-	
<b>G Structural soil systems</b>					
		enter sq ft 0	0.2	-	



# Benchmarking: Landscaping Code 185 Seattle Green Factor

## Flexibility

Alternative credits to meet Green Factor Landscape Requirements (“Bonuses”):

- Landscaping that consists entirely of drought-tolerant or native plant species
- Landscaping that receives at least 50% of annual irrigation needs are met through the use of harvested rainwater or collected greywater
- Landscaping visible from adjacent public right-of-way or public open spaces
- Landscaping in food cultivation

## Other considerations

Permit requirements:

- Landscape professional qualifications
- Landscape areas must be designed by a landscape architect licensed in the State of Washington if the proposed project contains:
  - a. 10 or more residential units,
  - b. 20 or more new parking spaces,
  - c. 12,000 or more gross square feet of commercial or industrial space, or
  - d. more than 500 square feet of landscaping in containers.

Landscape plan submittal

Landscape Management Plan (required for Green Factor projects only)

Verification: Prior to issuance of the final Certificate of Occupancy

H Bonuses			
1	Drought-tolerant or native plant species	<input type="text" value="0"/>	0.1
2	Landscaped areas where at least 50% of annual irrigation needs are met through the use of harvested rainwater	<input type="text" value="0"/>	0.2
3	Landscaping visible to passersby from adjacent public right of way or public open spaces	<input type="text" value="2,772"/>	0.1
4	Landscaping in food cultivation	<input type="text" value="0"/>	0.1
Green Factor numerator =			8,029

\* Do not count public rights-of-way in parcel size calculation.  
 \*\* You may count landscape improvements in rights-of-way contiguous with the parcel. All landscaping on private and public property must comply with the Landscape Standards Director’s Rule (DR 6-2009)

## Green Factor Scoresheet

# Benchmarking: Landscaping Code

## Kirkland Green Factor

**Requirement:** (applies to parcels within the station area boundary)

All new developments and major renovations requiring Design Board Review per KZC 142.15 shall be designed, built, and certified to achieve or exceed requirements in three categories:

- High Performance Buildings
- Energy and Decarbonization
- **Ecosystems and Green Infrastructure**

(a) All new developments and major renovations shall be designed, built, and certified to achieve or exceed a **Green Factor score of 0.4**.

The Green Factor sets criteria for landscape and site-based sustainability measures. The landscape elements listed will contribute to larger district sustainability goals focused on the natural environment, ecosystems, and stormwater. The elements that contribute more significantly to supporting the citywide Sustainability Master Plan's goals related to Sustainable Urban Waterways, Conservation and Stewardship, Access to Parks and Open Space, and Sustainable Urban Forestry have been weighted higher in this Green Factor.

1. Landscape Elements		
A.	Bioretention facilities and/or soil cells	1.5
B.	*Structural soil systems	0.2
C.	Landscaped areas with soil depth less than 24"	0.1
D.	Landscaped areas with soil depth of 24" or more	0.6
E.	Preservation of existing trees - calculated at 20 sq ft per inch dbh (Trees must have a minimum diameter of 6" at dbh.)	1.0
F.	Preservation of Landmark Trees bonus - calculated at 20 sq ft per inch dbh (Trees must meet City of Kirkland's definition of Landmark Trees)	0.1
G.	Preservation of existing evergreen trees bonus - calculated at 20 sq ft per inch dbh (Preserved evergreen trees must have a minimum diameter of 6" at dbh)	0.1
H.	Ground covers or other low plants (less than or equal to 2' tall at maturity)	0.1
I.	Medium Shrubs or perennials - calculated at 9 sq ft per plant (2'-4' tall at maturity)	0.3
J.	Large Shrubs or perennials - calculated at 36 sq ft per plant (greater than 4' tall at maturity)	0.4
K.	**Small Trees or equivalent with calculated soil volume that meets or exceeds 500ft <sup>3</sup> per tree - calculated at 90 sq ft per tree (canopy spread 10' to 15' at maturity)	0.3
L.	**Medium Trees or equivalent with calculated soil volume that meets or exceeds 1000 ft <sup>3</sup> per tree - calculated at 230 sq ft per tree (canopy spread 16' to 24' at maturity)	0.5
M.	**Large Trees with calculated soil volume that meets or exceeds 1500 ft <sup>3</sup> per tree - calculated at 350 sq ft per tree (canopy spread 25' and greater at maturity)	0.7
2. Green Roofs		
A.	Area planted with at least 2" of growth medium but less than 4" of soil	0.4
B.	Area planted with at least 4" but less than 8" of soil	0.7
C.	Area planted with at least 8" of but less than 30" of soil	1.0
D.	Area planted with tree(s) and at least 30" of soil	1.5
3. Green Walls		
A.	Facade or wall surface obstructed with vines (calculate at 3 years of growth)	0.1
B.	Facade or wall surface planted with a green wall system (must have year-round irrigation and maintenance plan)	0.2
4. Landscape Benefits		
A.	***Landscaped areas in food cultivation	0.2
B.	Landscaped areas planted with native or drought tolerant plants	0.1
C.	Landscaped areas at sidewalk grade where the majority of the area is covered with vegetation that is native or drought tolerant, and/or provides habitat for urban wildlife and pollinators	0.1
D.	Landscaped areas where at least 50% of annual irrigation needs are met through the use of harvested rainwater	0.2
E.	****Planting that provides food, forage and refuge for a diversity of species (native insects, pollinators, birds, and other urban wildlife) and/or inclusion of habitat elements such as woody debris, gravel/ cobble, nesting materials, etc.	0.2
5. Permeable Paving		
A.	Permeable paving over a minimum 6" and less than 24" of soil or gravel	0.2
B.	Permeable paving over at least 24" of soil or gravel	0.5
6. Innovation		
A.	Contributes to district sustainability goals including habitat connectivity, tree canopy, or stormwater goals beyond the site boundary. (i.e. Treating stormwater from public ROW on project site, daylighting piped streams, enhanced tree canopy and habitat connecting larger patches/corridors, enhance and maintain landscaping in ROW, enhanced stormwater treatment for water quality pollutants including metals, 6PPD Quinone, and phosphorus, landscape plan that demonstrates a commitment to minimal pesticide and fertilizer inputs) Scoring to be awarded at the discretion of the City of Kirkland.	0.2-0.5

# Benchmarking: Landscaping Code

## Kirkland Green Factor

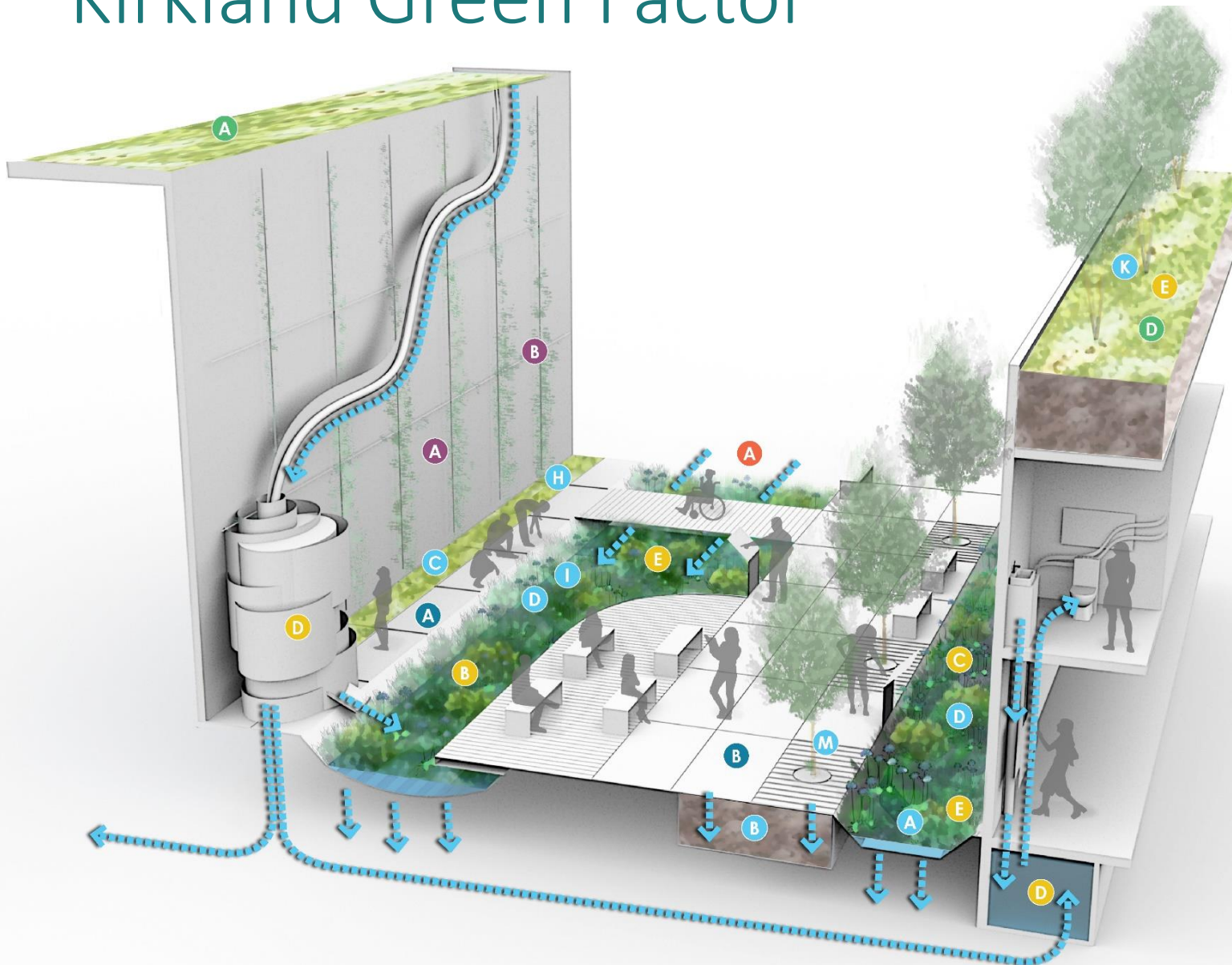
**Incentive:** (applies to parcels within the station area boundary)

The incentive zoning program may be utilized to achieve development of commercial uses up to the **bonus maximum allowed height** where the regulating district map identifies both a base and maximum allowed height.

- **Proposed List of Eligible Amenities**  
>> **Public Benefit Provided**
- **Enhanced Performance Buildings:** Design, build and certify to achieve Living Building Challenge v4 Carbon Certification or Living Building Challenge v4 Petal Certification  
>> New buildings that exceed Kirkland High Performance Building Code
- **Ecology and Habitat:** Achieve a **Green Factor Score of at least 0.75** – (as-of-right requires projects to demonstrate a score of at least 0.4)  
>> SF of land, enhanced ecology / habitat
- **Innovation Investments:** Design, build and operate innovative energy and/or decarbonization systems (on-site or within SAP)  
>> New and innovative sustainability infrastructure in the Station Area

# Benchmarking: Landscaping Code

## Kirkland Green Factor



### LANDSCAPE ELEMENTS

- A BIORETENTION FACILITIES AND/OR SOIL CELLS
- B STRUCTURAL SOIL SYSTEMS
- C LANDSCAPE AREAS WITH SOIL DEPTH LESS THAN 24"
- D LANDSCAPE AREAS WITH SOIL DEPTH OF 24" OR MORE
- E PRESERVATION OF EXISTING TREES
- F PRESERVATION OF LANDMARK TREES BONUS
- G PRESERVATION OF EXISTING EVERGREEN TREES BONUS
- H GROUND COVERS OR OTHER LOW PLANTS
- I MEDIUM SHRUBS OR PERENNIALS
- J LARGE SHRUBS OR PERENNIALS
- K SMALL TREES WITH 500 FT<sup>3</sup> SOIL VOLUME
- L MEDIUM TREES WITH 1000 FT<sup>3</sup> SOIL VOLUME
- M LARGE TREES WITH 1500 FT<sup>3</sup> SOIL VOLUME

### GREEN ROOFS

- A AREA PLANTED WITH AT LEAST 2" BUT LESS THAN 4" OF SOIL
- B AREA PLANTED WITH AT LEAST 4" BUT LESS THAN 8" OF SOIL
- C AREA PLANTED WITH AT LEAST 8" BUT LESS THAN 30" OF SOIL
- D AREA PLANTED WITH TREES AND AT LEAST 30" OF SOIL

### GREEN WALLS

- A FACADE OR WALL SURFACE OBSTRUCTED WITH VINES
- B FACADE OR WALL SURFACE PLANTED WITH A GREEN WALL SYSTEM

### LANDSCAPE QUALITY BENEFITS

- A LANDSCAPED AREAS IN FOOD CULTIVATION
- B LANDSCAPE AREAS WITH NATIVE OR DROUGHT TOLERANT PLANTS
- C LANDSCAPE AREAS AT SIDEWALK GRADE WHERE THE MAJORITY OF THE AREA IS COVERED WITH VEGETATION THAT IS NATIVE OR DROUGHT TOLERANT, AND/OR PROVIDES HABITAT FOR URBAN WILDLIFE AND POLLINATORS
- D RAINWATER HARVESTING
- E PLANTING THAT PROVIDES FOOD, FORAGE AND REFUGE FOR A DIVERSITY OF SPECIES AND/OR INCLUSION OF HABITAT ELEMENTS SUCH AS WOODY DEBRIS, GRAVEL/COBBLE, NESTING MATERIALS.

### PERMEABLE PAVING

- A PERMEABLE PAVING OVER 6"-24" SOIL OR GRAVEL
- B PERMEABLE PAVING OVER AT LEAST 24" OF SOIL OR GRAVEL

### INNOVATION

- A CONTRIBUTE TO DISTRICT SUSTAINABILITY GOALS INCLUDING HABITAT CONNECTIVITY, TREE CANOPY OR STORMWATER GOALS

# Benchmarking: Landscaping Code

## Parking Standards

**Tree/landscape requirements tied to parking are commonly:**

### **Defined by parking lot area:**

- 10% minimum landscaped (Lakewood)

### **Defined per stall:**

- 4' min. landscape strip every 5 spaces, 8 for large projects (Eugene)
- No more than 8 stalls between landscaping islands, each with one tree (Lakewood)
- Landscaped area: per parking space quantity based on lot size, 4' width min., 100 sf min. (Seattle)
- 1 tree per 10 parking stalls (Seattle)

### **Defined by on center spacing:**

- 30' on center along parking strip (Kirkland)

### **Defined as an offset around the perimeter:**

- 5' around the perimeter / 7' if vehicle overhangs landscape (Burien)



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# Benchmarking: Landscaping Code

## Parking Standards

1 tree per  
landscaping island

### Eugene

- Clusters of 5 spaces max (8 for large projects) separated by min. 4' landscaping
- More than 5 parking spaces min. 20' from street frontage property line

### Kirkland

- One row of trees, two inches in caliper for deciduous trees or six-foot tall for conifer trees and planted 30 feet on center along the entire length of the strip.
- Living groundcover planted to attain coverage of at least 60 percent of the strip area within two years.

### Burien

A minimum 5' wide Type IV landscape strip shall be provided on private property along the perimeter of a parking area. The width of the landscape strip shall be increased to 7' if vehicle overhangs into the landscape strip are allowed. Where bioretention is used, the facility shall be landscaped in accordance with BMC Title 13.

### Lakewood

All parking areas of over twenty thousand (20,000) square feet shall have a minimum of 10 percent of the total parking area, drive aisles, maneuvering area and loading space landscaped as a means to reduce the barren appearance of the lot and to reduce the amount of storm water runoff. Required perimeter landscaping adjacent to property lines shall not be calculated as accounting for a portion, or all, of the ten (10) percent figure.

4. *Type IV, Parking Areas.* A combination of landscaping to break up the bulk of a parking area. The following standards shall be applied:

- Landscaping Islands.* Landscaped islands shall be located at the end of each parking row. Internal landscaping islands shall occur at intervals within the row so that no parking stall within that parking row is more than eight (8) parking stalls from a landscaping island. The following standards shall apply:
  - The length of the island shall be the same depth as the adjacent parking stalls and have an interior width a minimum of four (4) feet.
  - The island shall be completely curbed.
  - Contain one (1) street tree.
  - One (1) medium shrub or two (2) small shrubs per twelve (12) square feet of island.
  - Vegetative ground cover.
- Internal Landscaping.* If internal landscaping other than landscaping islands is included in a parking area, the internal landscaping shall at a minimum consist of vegetative groundcover and trees per Type III, Open Space.
- Perimeter Landscaping.* Landscaping around the perimeter of the parking area shall be a Type I, Vegetative Buffer.

Lakewood: Landscaping type for parking areas

# Benchmarking: Landscaping Code

## Parking Standards

### Seattle

#### Landscaping requirements for surface parking areas:

Number of parking spaces	Required landscaping
20 to 50	18 square feet, per parking space
51 to 99	25 square feet, per parking space
100 or more	35 square feet, per parking space

- 1) Each landscaped area shall be no smaller than 100 square feet and must be protected by permanent curbs or structural barriers.
- 2) No part of a landscaped area shall be less than 4 feet in width or length except those parts of landscaped areas created by turning radii or angles of parking spaces.
- 3) No parking space shall be more than 60 feet from a required landscaped area. The landscaped area may include bioretention facilities.

#### Trees in surface parking areas:

- 1) One tree is required for every ten parking spaces.
- 2) Trees shall be selected in consultation with the Director of Transportation.

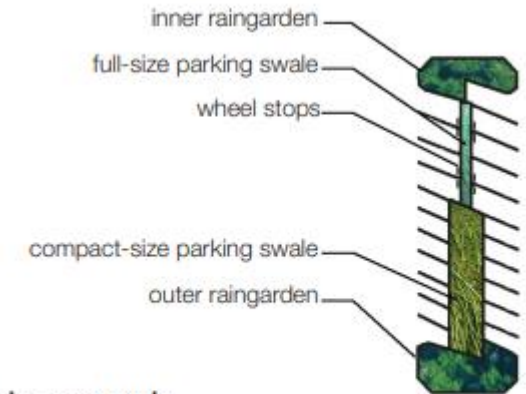
1 tree per 10 parking spaces



#### Green parking lot design options

Image courtesy of SvR Design Company

Seattle Green Parking code is about landscape area, stormwater and pervious surfaces



#### Telescope swale

Image courtesy of SvR Design Company

Seattle Green Parking Lots: SDCI Tip # 515

# Benchmarking: Landscaping Code Maintenance

- Security deposit / letters of credit are required for all replacement trees to ensure survival (Victoria, B.C.)
- Bonds for proper maintenance
  - Burien
  - Lakewood
- Maintenance Periods:
  - 5 years / life of “development” (Kirkland)
  - Life of “project” (Burien)
  - Life of “project” (Seattle)
  - 3 years / life of “project” (Tacoma)



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# Benchmarking: Landscaping Code Maintenance

## MAINTENANCE REQUIREMENTS

	Tacoma, WA	Eugene, OR	Kirkland, WA	Burien, WA	Lakewood, WA	Seattle, WA
Maintenance Periods	Landscaping to be installed and replaced as necessary, during the plant establishment period (3 years following planting) and for the life of the "project"	Maintenance of replacement trees is the ongoing responsibility of the property owner.	SF, duplex, triplex, ADUs, cottage: Maintain existing trees for 5 years. After 5 years, subject to KZC 95.25.  Multifamily: Maintain existing trees for 5 years. Maintain all required landscaping throughout life of the "development"  Dead plants must be replaced in kind.	All landscaping maintained for the life of the "project". Significant / exceptional trees for 3 yrs following C of O	Property owners responsible for maintaining all shrubs and trees in the landscape and planting areas, including pruning to maintain sightlines.	Owner to maintain for life of "project". If alterations or failures reduce landscape to level below minimum Green Factor score, new features required. Owner required to maintain / replace healthy planted trees for at least five years after inspection by the City.
Agreements / Bonds			A 5-year Tree Maintenance Agreement shall be recorded on the document approved by the City Attorney.	Performance bonds required for 2-3 years after planting to insure proper installation, establishment, and maintenance	City may require performance / maintenance bond if not adequately maintained	

# Benchmarking: Landscaping Code

## Landscape & Middle Housing

### Landscaping requirements for Middle Housing

- 48 sf per unit (Spokane)
- 150 sf of open space for every 1,000 sf of floor area (Berkeley)
- 200-250 sf required outdoor area per lot in single-dwelling zones (Portland)
- Required tree area: 40% of lot area for single to fourplex, 20% of lot for multi-dwelling (Portland)



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# Benchmarking: Landscaping Code

## 195 Landscape & Middle Housing

### Spokane, WA

Pilot Low-Intensity Residential Design Standards

#### Landscaping Implementation.

- Fifty percent of the area between the front lot line and the front building line must be planted with living ground cover. A patio or porch may be included in the calculation of ground cover area. (R)
- Landscaping is encouraged to follow the Spokanscape guidelines for design, soil and compost, drip irrigation, planting & mulch, raised beds, maintenance, and plant list. (P)
- Use of landscape structures such as trellises, raised beds and fencing to unify the overall site design is encouraged. (P)

#### Front Yards Implementation.

Attached houses, duplexes, and low-intensity residential buildings of three or four units shall incorporate a residential **front yard** between the primary structure and the back of sidewalk. (R)

48 SF per unit

#### Outdoor Areas Implementation.

Each development shall provide **a minimum of forty-eight square feet of outdoor area** for **each living unit within the building**. (R)

The outdoor area may be configured as either:

- A private outdoor area, such as a balcony or patio directly accessible from the unit; or
  - A common outdoor area accessible by all units in the building. (R)
- Common outdoor areas shall be easily accessible and visible to residents. (R)
- Common outdoor areas should provide at least three of the following amenities to accommodate a variety of ages and activities. Amenities may include, but are not limited to: (P)
- Site furnishings (benches, tables, bike racks, etc.);
  - Picnic areas;
  - Patios, plazas or courtyards;
  - Shaded tot lots;
  - Rooftop gardens; planter boxes, or garden plots; or
  - Open lawn.
- Outdoor spaces should not be located adjacent to dumpster enclosures, loading/service areas or other

# Benchmarking: Landscaping Code

## 196 Landscape & Middle Housing

### Berkley, CA

#### Middle Housing Standards

Old code requirements: open space SF per unit

#### Minimum Required Open Space

*Current Policy:* Table 7 summarizes current minimum open space requirements in low-density residential zones, on a per unit basis.

Table 7. Current Required Open Space

	R-1	R-1H	R-1A	R-2	R-2H	R-2A	R-2AH	MU-R
Per dwelling unit (sf)	400	400	400	400	400	300	300	150

*Proposed Policy:* The proposed development standard would require 150 sf of open space for every 1,000 sf of floor area on a project site, in each of the low density Residential districts. Note that required open space is no longer based on the number of units, but on a project's total floor area. The proposed open space standard is designed to permit a larger percentage of total lot area to be dedicated to residential development while also preserving the requirement to provide residents with usable open space.

Middle Housing code: 150 SF per 1,000 SF of floor area

#### Minimum required open space

Each development shall provide 150 SF of open space for every 1000 SF of floor area on a project site

The outdoor area may be configured as either:

- A private outdoor area, such as a balcony or patio directly accessible from the unit; or
- A common outdoor area accessible by all units in the building. (R)
- Common outdoor areas shall be easily accessible and visible to residents. (R)
- Common outdoor areas should provide at least three of the following amenities to accommodate a variety of ages and activities. Amenities may include, but are not limited to: (P)
- Site furnishings (benches, tables, bike racks, etc.);
- Picnic areas;
- Patios, plazas or courtyards;
- Shaded tot lots;
- Rooftop gardens; planter boxes, or garden plots; or
- Open lawn.
- Outdoor spaces should not be located adjacent to dumpster enclosures, loading/service areas or other

# Benchmarking: Landscaping Code Landscape & Middle Housing

## Portland, OR

(Residential Infill Project)

### Required Outdoor Areas

The shape of the outdoor area must be such that a square of the stated dimension will fit entirely in the outdoor area.

#### C. Requirements.

1. The required outdoor area must be a contiguous area and may be on the ground or above ground.
2. The area must be surfaced with lawn, pavers, decking, or sport court paving which allows the area to be used for recreational purposes. User amenities, such as tables, benches, trees, planter boxes, garden plots, drinking fountains, spas, or pools may be placed in the outdoor area. It may be covered, such as a covered patio, but it may not be fully enclosed. Required outdoor area may not be used as vehicle area.

Essentially equivalent to Tacoma's Tree Canopy requirement, but 40% for 1-4 units

Minimum required outdoor area for residential zones

Quantified benefit of small, medium and large trees matches Tacoma, but planting area is about double

Summary of Development Standards In Single-Dwelling Zones

Standard	RF	R20	R10	R7	R5	R2.5
Required Outdoor Area - Minimum area	250 sq. ft.	250 sq. ft.	250 sq. ft.	250 sq. ft.	250 sq. ft.	200 sq. ft.
- Minimum dimension (See 33.110.240)	12 ft. x 12 ft.	12 ft. x 12 ft.	12 ft. x 12 ft.	12 ft. x 12 ft.	12 ft. x 12 ft.	10 ft. x 10 ft.

#### D. On-Site Tree Density Requirements.

1. Required Tree Area. The required tree area is based on the size of the site and the type and size of proposed and existing development as shown in Table 50-2. Applicants may choose Option A or Option B for calculating required tree area except only Option A may be used to apply standards to a "Development Impact Area".

Table 50-2  
Determining Required Tree Area

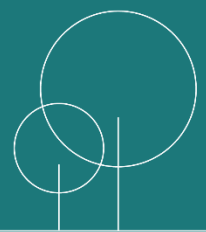
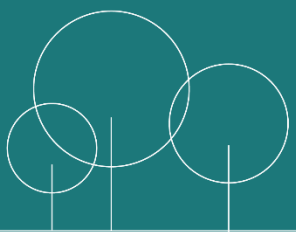
Development Type	Option A	Option B
One to Four Family Residential	40 percent of site or development impact area	Site area minus building coverage of existing and proposed development
Multi Dwelling Residential	20 percent of site or development impact area	
Commercial/Office/Retail/Mixed Use	15 percent of site or development impact area	
Industrial	10 percent of site or development impact area	
Institutional	25 percent of site or development impact area	
Other	25 percent of site or development impact area	

2. Required Tree Density. The required tree area shall be planted with some combination of large, medium or small canopy trees at the following rates:

Number of Required Trees and Minimum Planting Area

Canopy size category (at maturity)	Number of trees required per size of tree area	Min. required planting area per tree (min. dimension)
Large	1 per 1,000 s.f.	150 s.f. (10' x 10')
Medium	1 per 500 s.f.	75 s.f. (5' x 5')
Small	1 per 300 s.f.	50 s.f. (3' x 3')

# Tacoma Code Audit



# Tacoma Code Audit

## • Observations

- Tree requirements pertain to:
  - Canopy as a percentage of lot area
  - Landscaped area as a percentage of lot area
  - Interior & perimeter parking relative to lot area
  - Street trees relative to street frontage
- Simplify, and clarify what requirements are additive vs. what can be met with the same trees
- Definitions of small, medium, and large trees quantify tree benefit; consider implications of spacing requirements
- How to match tree definitions and standards to best address urban forestry goals?
- Urban Forest Manual is helpful, but could be improved with greater simplicity and clarity
- Landscaping requirement exemptions and lack of tree preservation requirements misses the opportunity to maintain and increase canopy in Middle Housing zones

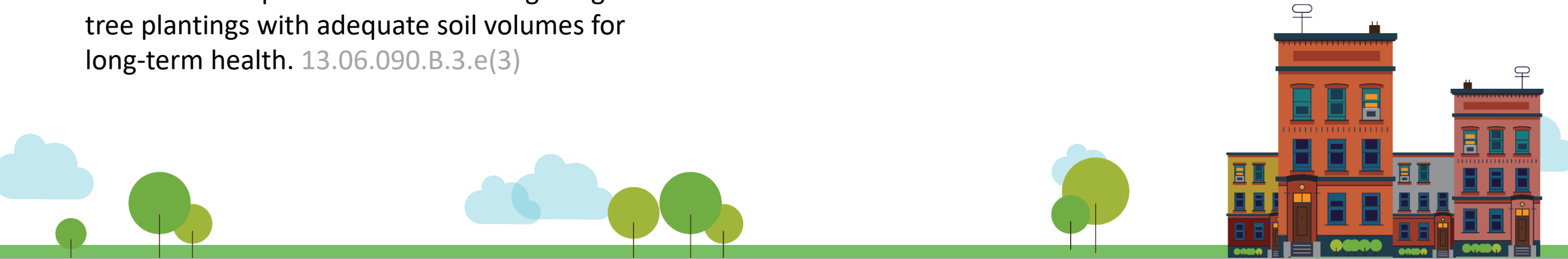
## • Opportunities for exploration:

- Single way to determine new tree requirements (not both canopy and landscaped area)
- Tree preservation requirements
- Evaluate definitions of small/medium/large, their benefits, and clearances, to incentivize large trees
- Remove exemptions to landscaping standards for single, two and three family and townhouse developments (i.e. future Urban Residential districts)
- Stronger requirements and credits/greater benefit allocated for additional soil volume (consider soil cell incentives)
- Include requirement for % evergreen for developments with <25 trees
- Remove site perimeter landscaping requirement for development flexibility
- Consider parking lot landscaping standards threshold at 16 stalls rather than 15 (units per min. density in midscale zone)
- Green Factor



# Tacoma Code Audit (Detailed)<sup>200</sup>

- **13.06.090 Landscaping Standards**
- Landscaped Area & Tree Canopy % requirements often lead to different totals for required new trees. Simplify so there is only one calculation.
- Is there a high-resolution resource to reference for open space corridors? 13.06.090.B.3.c(2)
- Consider including requirements for percent evergreen when planting 25 or fewer trees (Middle Housing). 13.06.090.B.3.d(3)
- Evaluate minimum spacing between trees and soil volume requirements to encourage large tree plantings with adequate soil volumes for long-term health. 13.06.090.B.3.e(3)
- Remove exemptions from landscaping requirements for single-family, two and three-family and townhouses 13.06.090.B.4.a.(2)
- Remove or adjust site perimeter landscaping requirements for Middle Housing 13.06.090.B.4.e.
- Planting requirements for street trees: Consider canopy and understory requirements / requirements by street type similar to Eugene? 13.06.090.B.4.f(3)



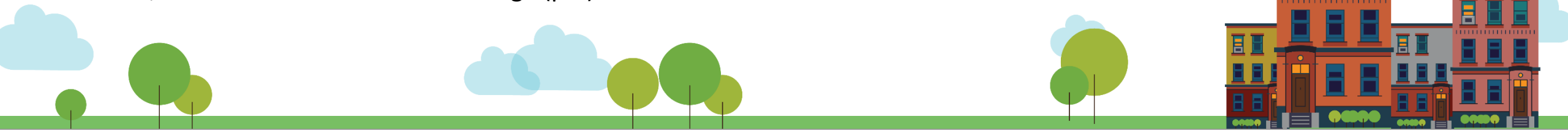


# Tacoma Code Audit (Detailed)<sup>201</sup>

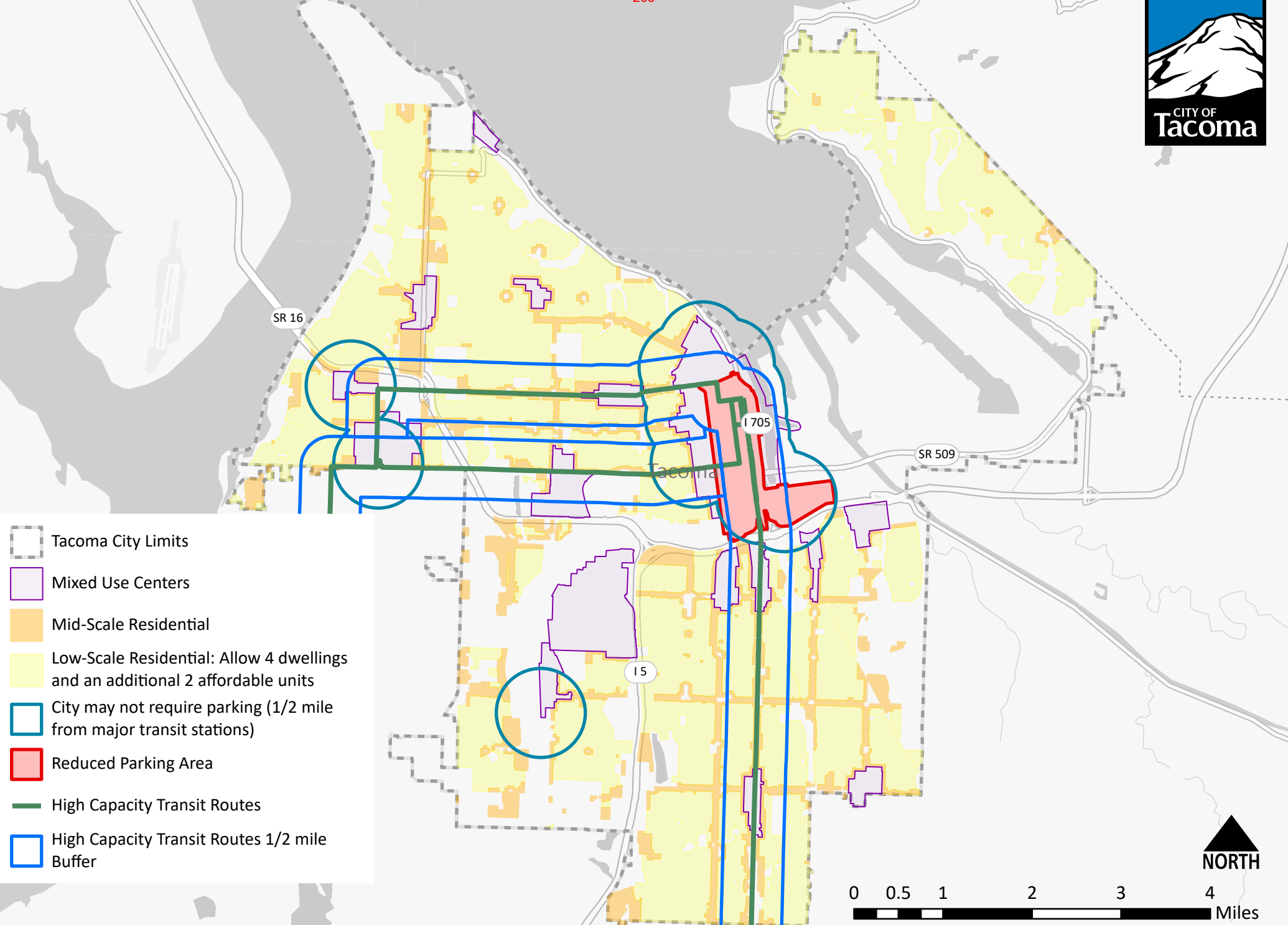
- **13.06.090 Landscaping Standards**

- Remove exemption to include parking lot landscape standards for <15 stalls. Change threshold of parking lot landscaping standards to 16 stalls rather than 15 (units per min. density in midscale zone). 13.06.090.B.4.g(2)(b)
- **Urban Forest Manual**
- Worksheet language: “If other required landscaping is equal to or greater than this amount, then no further landscaping is required.” Confusing language – clarify “other” (p.5)
- Clarify “areas not planted” (p.6)
- Typo: “sf” intended, but “lf” written (p.8)
- Interior Parking Requirements: “average of 40 foot intervals along walkways” assumes either side of interior aisle for total of 80’; revise to 80’ for Middle Housing? (p.8)

- Tree credits for retention: Re-evaluate if new retention requirements are implemented (p.10)
- Soil depth requirements are confusing; UF Manual calls out 3’ depth, but standard plans show root ball depth for tree planting, and 6” or 8” topsoil for shrub planting. (p.16)
- Potential to encourage large tree plantings by offering additional credit for large trees + greater soil volume.
- Consider spacing standards to encourage large trees (allow exemptions based on mature width from UF Manual?)







- Tacoma City Limits
- Mixed Use Centers
- Mid-Scale Residential
- Low-Scale Residential: Allow 4 dwellings and an additional 2 affordable units
- City may not require parking (1/2 mile from major transit stations)
- Reduced Parking Area
- High Capacity Transit Routes
- High Capacity Transit Routes 1/2 mile Buffer



