



Urban Design Review Program and TMC Amendments

Staff Responses to Public Review Draft Issued by Planning Commission July 19, 2023

Topics

A. Program Impacts on Development

B. Thresholds and Departures*

C. Guidance and Manual

D. Tree Canopy

E. Board Composition*

F. Code Amendments*

G. Effective Dates

** Note that Planning Commission direction is specifically requested on items B, E, and F.*

A. Program Impacts on Development

Comment Theme:

What impacts would the proposed Urban Design Review Process have on new development, particularly housing production equitably across the city?

Concerns Expressed (see below for individual comments submitted and detailed replies)

A few comments about this proposal focused on adding additional time to permitting and/or having equity impacts.

About equally, others expressed support for the program design's emphasis on creating flexible means and a predictable path to allow creative design alternatives.

Response/Options to Consider:

By including the leading affordable housing developers in the program development process (through their ongoing participation in the Project Advisory Group), we have been sensitive to the concerns of those developing projects likely to be subject to this new program.

Moreover, we have built this proposal specifically to avoid the operation and focus of other cities' programs where delay and uncertainty are

justified criticisms. We have also structured the proposal to address the obstacles they currently face (e.g., needing to seek Variances for minor departures to existing, inflexible design detail requirements). The program’s design guidance is explicitly NOT adding “constricting design guidelines” but rather provides examples of various design approaches that will satisfy urban design priorities---not detailed architectural regulation or style details.

The positive impact that this proposal can have on development (though its support for site-specific creative design solutions) was supported and articulated by nonprofit low-income housing developers because it is familiar to them as they work at a scale to which they are familiar in other jurisdictions. Tacoma’s program would apply similarly.

As emphasized by the Planning Commission and Council, equitable design outcomes should not be the exclusive province of privileged neighborhoods who have resources and capacity to self-advocate and/or intervene in individual development proposals. Consistent with new State law, the program proposal is designed to establish limited processing steps and timelines, clear and objective approval criteria, and implemented consistently to result in equitable outcomes across the various locations in the city.

B. Thresholds and Departures

Comment Theme:

Development size thresholds and relationship to the proposed review processes, including circumstances that involve the Board and departures.

Concerns Expressed:

Some comments question whether building size should be the only metric by which Urban Design Project Review is required. Others acknowledge that smaller projects should not have the same review burden as larger projects. Also, a few comments indicate confusion about whether only departure requests would require an Urban Design Board process.

Additionally, more information about the Departure process was requested.

Response/Options to Consider:

We agree that smaller projects are more sensitive to time and cost influences of approval processes, and have proposed thresholds scaled appropriately. Thresholds have been set to avoid burdening smaller projects. Even so, smaller projects in the applicable areas will now have the benefit of access to a more straightforward and efficient departure process, rather than the current burden and uncertainty of seeking Design Variances.

We also find that larger projects and their development teams are quite familiar with early design guidance processes, including a Board meeting, and generally expect to include that step in their entitlement processes. That is one of the reasons why the smallest projects would be exempt from Urban Design Review, and medium-sized developments would follow an administrative-only review. However, small and

medium sized projects that voluntarily choose to pursue departures would include one public meeting with the Urban Design Board (rather than the uncertainty of the current Design Variance process).

Whether or not they seek departures, and consistent with new State law, all projects above a certain threshold size (i.e., 40,000gsf in NMUCs, 100,000gsf in other MUCs) would be limited to having only ONE Public Meeting of the Urban Design Board. However, at that one public meeting, the Board would have the authority to “off-ramp” a project and therefore absolve it from returning to the Board for Final Review. Regardless all projects over the established and respective size thresholds would be required to one Board meeting.

Finally, we agree that thresholds be set sensitively to context, as one commenter suggested. That is, the threshold for Urban Design Review in Neighborhood centers is notably LOWER than in the Regional Growth Centers downtown or in the Mall area, or Crossroads Centers, where larger parcels and more significant sized developments are constructed.

Planning Commission direction is requested on the items below.

As Departures are concerned, the draft proposal allows alternative design proposals that do not meet certain development and design requirements to be considered with UDPR applications, referred to as a Departure. Items that can be approved through departure review are limited to parking development standards (TMC 13.06.090.C, 13.06.090.D, 13.06.090.E) and building design standards (TMC 13.06.100), which are analogous to existing variances. To receive approval, applicants must demonstrate the proposed alternative design provides equal or superior results to the requirement from which relief is sought in terms of quantity, quality, location, and function. However, in response to some comments received, particularly those related to tree preservation, and to provide as much design flexibility as possible staff believe some revisions to the draft departure provisions are worth considering.

- Expand scope of eligible standards: Consider expanding standards to which departures can be requested to include certain development standards not included in the draft proposal. Examples include, but not necessarily limited to:
 - Prohibition of ground-floor residential uses along designated Pedestrian Streets
 - Maximum setbacks
 - Amenity space requirements
 - Residential transition standards
- Clarify considerations for approval: While staff believe the draft language provides an opportunity to consider a wide range of ways in which a development might provide superior results to prescriptive standards, including preservation of natural features such as significant trees, this could be more explicit. To achieve this, language that more explicitly lists the range of elements that can be considered in departure review, particularly preservation or responsiveness to nature features, could be added.

C. Guidance and Manual

Comment Theme:

Comments range from concern and questions about the intent and use of the guidelines to very specific design topics of interest to commenters.

Concerns Expressed:

A few commenters appreciate the guidance documents offering alternative design approach options to meet clear and objective criteria. Others would prefer a checklist of required, specific design elements. Specific design topics requested include building shapes, renewable energy generation, EV charging infrastructure, and that designs respond to surrounding context and built form.

Response/Options to Consider:

We agree that satisfactory design solutions consider surrounding built form as well as microclimate and a sustainability-orientation in site planning and urban design considerations. Because the opportunities and constraints of each development differ from site to site and local context, that is precisely why the guidance documents do NOT prescribe required solutions, but rather illustrate a range of possible approaches to satisfy the approval criteria of the seven urban design focus areas.

D. Tree Canopy

Comment Theme:

Concern for tree preservation and increasing the city's overall tree canopy.

Concerns Expressed:

Existing trees should be preserved and additional tree planting should be a high priority.

Response/Options to Consider:

We agree that early design guidance can be a valuable forum for exploring site plans and building arrangements that can preserve on-site urban trees. In addition, street tree and other planting can be an important strategy for shading pavement and structures alike. The proposed Urban Design Project Review process will create opportunities to identify and address potential conflicts early in the design process. The proposed Departures process will include specific reference to preservation of trees as one basis for creative design approaches that might not otherwise be allowed under Code Standards.

Staff also note that the design of capital projects and other programs well beyond this proposal's limited scope will be necessary to grow the city's overall tree canopy.

E. Board Composition

Comment Theme:

Interest expressed in equitable representation across the city and balance between professional expertise and other perspectives on the

Urban Design Board. Given the reliance on professional expertise for more than half of the Board, the draft proposal provides for up to two Board members to reside outside the City as a means to avoid vacancies on the Board.

Concerns Expressed:

A request that north end Council Districts (e.g., 1 and 2) have dedicated positions on the Board. Also concern expressed that cultural diversity be represented on the Board, and not limited to the “conservative white male perspective.”

Concern and opposition to the allowance for non-Tacoma residence to sit on the Board has been voiced in previous discussions with the Planning Commission’s Vice Chair Steele.

Response/Options to Consider:

Geographic diversity on the Urban Design Board is an important priority built into the program proposal. We agree that the goal of diversity should be clearly presented and built into the program. For that reason, the proposal specifies a minimum participation from historically underrepresented and lower opportunity areas of Tacoma (at least two members representing City Council districts 3, 4, or 5), while also valuing relevant lived experience beyond professional credentials.

Furthermore, consultation with the City Clerk Office’s staff responsible for recruiting and preparing candidates for Council-appointed Committees, Boards, and Commission (CBC) emphasize the ongoing challenge of filling CBC positions with qualified volunteer members. For this reason, they recommend allowing the possibility of including non-residents (up to a certain maximum number) on the Board, as the timeline for new Council appointments is complex and lengthy, and could delay seating a complete and functional Board.

Planning Commission direction is requested on the item below.

Staff is confident that neighborhood residents from higher opportunity areas, higher levels of formal educational attainment and overall privilege (i.e., Districts 1 and 2) will undoubtedly present themselves as candidates for the Urban Design Board (UDB). Nonetheless, staff recommend the Planning Commission consider modifying the composition of the Board to include minimum participation from all Council Districts.

- Consider adding a requirement that at least one or two Board members reside or have primary place of business in City Council Districts 1 or 2. This mirrors the draft requirement for Council Districts 3, 4, and 5.

Staff also seeks direction as to whether the provision to allow up to two non-Tacoma residents should remain or be eliminated.

F. Code Amendments

Comment Theme:

The City is also considering several amendments to the Land Use Regulatory Code (TMC Title 13) that would modify development and building design standards in areas within the Mixed-Use and Downtown zones. The items we have received comments on are discussed below.

Yard/Amenity Space Requirements-- *Planning Commission direction is requested on this item.*

Current code uses the term “yard space” to describe a wide range of private and common spaces including balconies, courtyards, rooftop decks, etc. The draft proposal would replace the term “yard space” with “amenity space” to better reflect the range of types of space that satisfy these requirements and some interior spaces would now be eligible to meet these requirements.

Current code exempts yard space requirements for developments that meet one of these three: located within ¼ mile of parks or school yards, achieve a 3 FAR, or incorporate ground floor retail/restaurant uses.

The draft proposal would make the following changes:

- Introduce a tiered set of reductions full and 50%. Full reductions would be limited to the most intensive Mixed-Use zones, typically located along busier streets, including designated Pedestrian Streets. Other zones would be limited to the 50% reduction.
- Proximity to a park space would be a required condition (1/8 mile for full reduction, ¼ mile for 50% reduction) and school yards would be eliminated.
- One of the other two existing conditions (FAR and active commercial ground floor use) would also need to be met to qualify for a reduction.

These proposed revisions are in response to observed inconsistent quality and access to school yards across the city and to better ensure developments that take advantage of the reductions are also reflective of the vision for mixed-use centers in terms of density, scale, and mix of uses.

Concerns Expressed:

- Generally unsupportive of yard/amenity space exemptions and emphasis on shared, common spaces
- Concerned how these code amendments might negatively impact development of small/moderate-sized sites (i.e. 25 – 75’ wide).
- Specific code revisions suggested related to applicability and qualifying amenity spaces

Additionally, previous discussions with the Planning Commission indicated there may be some interest in eliminating the exception provision all together.

Response/Options to Consider:

Staff agree access to private outdoor space is highly desired but that requiring such amenities for every unit presents some challenges and trade-offs to consider in light of the vision for development in mixed-use centers, which is relatively dense in terms of number of units but also building massing. For this reason, staff believe it is reasonable to revise current requirements to provide greater flexibility in the types of

spaces that meet amenity space requirements (such as indoor spaces) but also scale back current yard space exceptions for the reasons discussed above.

Planning Commission direction is requested on the items below.

Staff share the concerns raised related to potential impact of amenity space requirements on small to mid-sized developments. The current requirements and exceptions are not based on the scale of development and the proposed draft amendments do not currently include these either. While staff believe the proposed amendments to the exception provisions logically and reasonably addresses the amendments' intent, staff believe they may have a disproportionate impact on smaller developments and some revisions to the draft requirements and exception language is worth considering per the concerns raised.

- Amenity space requirements: Introduce a scaled or tiered set of amenity space standards, whether they're based on site area, building area, or number of units could be developed. For example, smaller project sites (i.e. less than 20,000 sq. ft.) could require less amenity space per unit than sites greater in size.
- Amenity space exceptions: Instead of fully eliminating school yards from being a type of qualifying park facility, more specific language could be developed to better refine which school yards would qualify for the exception. For example, the term "school park" could be used and defined with specific requirements such as long-term inter-agency agreements between Tacoma Public Schools and Metro Parks, which aligns with an active pilot "Community Schoolyard" program between TPS, Metro, and the Trust for Public Land.
- Amenity space exceptions: Continue to allow for a wider application of the full reduction, equivalent to the current exceptions, for smaller developments.
- Amenity space exceptions: Consider eliminating the exception/reduction provisions entirely. This might be more appropriate if combined with a reduction in required amenity space for smaller development sites.

Building Design Standards

Comment Theme:

The City employs a set of minimum building design standards within Mixed-use and Downtown zoning districts. These are intended to ensure a minimum level of building design that is consistent with the type and scale of development that is envisioned in these areas. Generally, these areas are envisioned to consist primarily of mid-rise (5-10 stories) buildings (taller "tower" buildings are generally limited to the Downtown Commercial Core zone) with an emphasis on the pedestrian experience at the ground-floor.

Concerns Expressed:

- Does not support design standards that “attempt to legislate aesthetics.” Cited sections include: Ground Floor Façade Details and Articulation and Building Form and Expression Façade Articulation and Roofline Design.
- A number of comments were provided regarding specific standards. These are addressed in the table below.

Response/Options to Consider:

Staff recognize the limits prescriptive standards such as those currently employed by the City. Strengths of these types of requirements are they ensure a minimum level of design for developments and are predictable. Weaknesses can include fostering a sense of sameness amongst developments and hampering design creativity. Staff find these types of standards to be necessary and generally effective but identified opportunities to reduce unnecessary complexity and provide greater flexibility as reflected in the draft proposal. Recognizing the best design solution for a development might not conform exactly to the prescribed requirements, staff hope to encourage applicants to pursue design alternatives (known as “Departures”) through the Urban Design Project Review permit review.

G. Effective Dates

The City is considering establishing a new Urban Design Project Review (UDPR) land use permit process for developments of a certain size located within a designated Mixed-Use Center.

The City is also considering several amendments to the Land Use Regulatory Code (TMC Title 13) that would modify development and building design standards in areas within the Mixed-Use and Downtown zones.

Concerns Expressed:

- How are projects “in-process” affected by the program?
- Please explain/explore providing a grace period between approval and effective date.
- Please include a transition period of at least six months.

Response/Options to Consider:

If passed, staff expect the two discrete portions of the proposal (UDPR and TMC code amendments) to have different effective dates. Code amendments are typically effective 10-30 days after adoption but more significant changes, such as these, may warrant longer timeframes. The goals of these grace periods are to provide a sufficient and reasonable amount of time to make necessary adjustments to projects currently in design, allow impacted projects to be better prepared for the new permit process, and hopefully avoid surprises at the time of permitting.

These effective date timeframes have yet to be determined but could range between 30 to 180 days. Ultimately, the effective dates will be set at the discretion of City Council at the time of adoption.

Regardless of how long the UDPR grace period is, City staff would be available during this time to provide pre-application consultation to help streamline the application process once the program is active.

TOPIC A: Program Impacts on Development

Streamlining the process for overall approval is not a bad thing as long as the overall impact is considered above minor technical variances that are necessarily addressed in the overall evaluation process anyway.	TW	Agreed.
a fair and quick process that requires the project team to look at all the community design issues is important.	DF	Agreed. Consistent with new State law, the program proposal is designed to establish limited processing steps and timelines, clear and objective approval criteria, prioritizing equitable outcomes across the various locations in the city.
Small and medium projects can do prescriptive design requirements to keep the cost down, if the perspective requirements are reasonable, clear and easy to follow in the Design manual.	DF	Agreed. Project thresholds are set to respond to complexity of projects, and those developments’ respective capacity to engage in more involved entitlement processes.
staff exhibited consistent commitment to providing a program that resulted in maximum benefit for the public, with minimal negative impacts to the development community.	BF	Comment noted. Volunteer participation from the design, nonprofit housing, and other development community representatives has been essential to guiding the staff’s work on developing this program proposal.
Thresholds should not be purely number driven (i.e, solely related to the square footage of the project). It should also be context driven.	FD	We agree. For that reason, thresholds and the level of review are set relative to the type of growth area where projects would be subject to Urban Design Review. That is, a proposed development of a certain intensity could have a more substantial relative impact in a Neighborhood center than downtown, and therefore the thresholds for those locations are calibrated in response to that contextual circumstance.
I would like to see the project sponsors identify a comprehensive list of risks (and mitigations to those risks). I would like the project sponsors to	ZC	Precedents, lessons learned, and program modifications in relevant peer jurisdictions were presented to the Planning Commission at its meeting of December 15, 2022.

identify instances where similar policies were adopted elsewhere previously.		
Concern raised about establishing a “design review board.” Concerns raised include that design review boards can result in development delays, which increases costs, and have been used to restrict development, particularly housing, and excluding housing in certain areas of a city.	RB	We agree that the process must be well managed to contain scope relative to the size of project, review and communication timelines, and a limit on only one public meeting (per new State laws) and to assure equitable outcomes throughout the city. This requires having a clear and efficient process, strong staff role in using the objective review criteria, and equally administrated not subject to “NIMBY weaponization” in more privileged areas.
Concerns raised about the design review increasing the City’s exposure to possible litigation.	RB	Thank you for expressing this concern. Staff have consulted with the City Attorney to get clear guidance and confirm legal authority and new requirements set by new State legislation.
Demand for affordable housing vouchers is greater than those current availability.	RB	Comment noted. Please note that the Tacoma Housing Authority, an independent public agency that is wholly separate from the City, is solely responsible for obtaining (from the Federal government) and managing the inventory of affordable housing vouchers available within Tacoma. See responses to concerns raised about impacts to development in general above.
Concerned that the new project review permit process will increase the overall cost and risk born by developers and make it more difficult. Instead, suggests the City speed up the permitting process.	CD	Comment noted. See responses to concerns raised about impacts to development in general (Topic A) above.
Design review boards have been used to exclude housing production resulting in increased costs and reduced housing capacity. Suggests design review be used to ensure requirements are met and not just subjective design preferences.	YR	We agree. This proposal is oriented to having a clear and efficient process of which a Board review component would only be engaged in the very largest projects, with strong staff role in using the objective review criteria, and a program equally administrated as not subject to “NIMBY weaponization” in more privileged areas. Additionally, this program is overwhelming attentive to larger concerns of neighborhood fit and urban design function, not architectural style or details of color, material, etc. Finally, new State law explicitly prohibits design review from materially decreasing height, bulk, or scale allowed by the underlying zoning. As a benefit, the proposal will provide a new, more proscribed avenue for allowing creative design solutions without lengthy Variances.

<p>What are possible impacts of the program as it relates to perpetuating “exclusionary housing” practices.</p>	<p>PC-RK</p>	<p>See response above.</p>
<p>By making one more permit process, board reviews, and constricting design guidelines you are making it more difficult to build affordable housing. More regulation equals more cost. The city should be trying to make it easier to build, not harder to build.</p>	<p>SK</p>	<p>By including the leading affordable housing developers in the program development process (through their ongoing participation in the Project Advisory Group), we have been sensitive to the concerns of those developing projects likely to be subject to this new program. Moreover, we have built this proposal specifically to address the obstacles they currently face (e.g., needing to seek Variances for minor departures to existing, inflexible design detail requirements). The program’s design guidance is explicitly NOT adding “constricting design guidelines” but rather provides examples of various design approaches that will satisfy urban design priorities---not detailed architectural regulation.</p>
<p>Overall, we are appreciative of the intent of updated design guidelines and design review for the City of Tacoma. Utilizing guidelines and advisory design review are a great way to prompt development and design teams to think about the issues of design and public realm that matter most, while still giving design teams flexibility to respond to their particular context. We also appreciate how the program is designed to respond to known issues with design review in other jurisdictions.</p>	<p>KR</p>	<p>Comment noted.</p>
<p>TOPIC B: Thresholds and Departures</p>		
<p>I am dubious about the size of a building schedule with large projects getting a full design review by the board review, medium size buildings getting an administrative review and small buildings getting none. All should comply and if they do not meet administrative review, they can elect to go to the Design Review Board.</p>	<p>DF</p>	<p>We agree that smaller projects would be exempt from Urban Design Review, and medium -sized developments would follow an administrative only review—and only those that voluntarily choose to pursue departures would include one public meeting with the Urban Design Board.</p>

I am less concerned with good design in large buildings.		
If projects meet the minimal requirements they can have administrative approval and move forward quickly. This is the best aspect of this program.	BF	Note that all projects above a certain threshold size (40,000 gsf in NMUCs, 100,000 gsf in other centers) would be required to have ONE public Meeting of the Urban Design Board. At that meeting, the Board would have the authority to “off-ramp” a project and therefore absolve it from returning to the Board for Final Review (see next comment below). However, in all cases, projects over the established and relevant threshold would need to have one Board meeting.
Projects will not need to present to the Design Review Committee unless they wish to take an alternate approach that meets or exceeds the well-defined criteria. This approval off-ramp will hopefully enable innovative designs that can become landmarks and sources of public pride. In many design programs these kinds of buildings are simply not allowed.	BF	To clarify, the “off-ramp” provision would be available only for projects that, after their first, threshold-determined Board meeting, are found to be of such strong design concepts that their final review could be made administratively, and avoid having to come back to the Board for Final Review.
Explain the departures process	PC-BS	Departures from the Code’s Building Design Standards and certain parking-related design standards (not quantity) would be available to any proposal subject to urban design review. Requesting a departure would not change the UDPR review path. This process would replace the current design and parking lot design Variance provisions of the TMC. Please see discussion above related to potential revisions to Departure scope and criteria.
TOPIC C: Guidance and Manual		
take design cues from older surrounding structures and that neighbors should be consulted.	MW (w)	Comment noted. The guidance documents emphasize the value of site surroundings in informing design responses. Furthermore, public notice and circumstances where a single public meeting are allowed by new State law are incorporated into the proposal.

contributions to civic improvement should be included here. Solar panels, charging stations, schools.	MW (w)	Comment noted. The guidance documents emphasize the value of, and will include additional examples of, microclimate- responsive and climate resilience strategies to inform design responses.
Guidelines should require new development to fit into the larger neighborhood – not necessarily just adjacent houses.	MW (o)	Consistent with the focus on the city’s mapped Growth Centers, the program will be evaluating development proposals based on the underlying zoning capacity, height regulations, and similar provisions in the Code. New State law prohibits design review from materially reducing the height, bulk, scale, and density allowed by the underlying zoning.
Design consideration need to be given to the overall character and style of the surrounding neighborhood for new development. Buildings should include articulated facades on all sides with minimum articulation/modulation standards.	KK (o)	Current and proposed code language includes some provision for building articulation or vertical modulation for buildings over a certain size or width as a means to reduce the building’s massing. It is worth noting, the proposed amendments would provide greater flexibility to the developer in how massing is approached so vertical modulation may not be provided in all circumstances where the developer/designer opted for an upper story stepback or a courtyard instead.
The Design Review Manual Guidelines should be specific not vague! The Design Manual does not instruct the designer with a specific guideline. If this is on purpose then the process will be long, length, political and costly.	DF	To clarify, the project Review Manual (“guidelines”) are designed as providing a wide set of clear and distinct example approaches, intentionally encouraging creativity of designers and responsiveness to specific site contexts that cannot be exhaustively anticipated. Moreover, by specifying that the state-mandated time limits and one-public-meeting limit, the proposal is explicitly
[The] program avoids the “Garanimals” approach to design that many design review programs use, policies such as “pick two features from column A for a façade exceeding 50-feet, pick a building base from column B, and a building top from Column C.”	BF	Noted. The guidelines are intended to provide a range of design approaches acceptable to meet approval criteria, but not proscribe specific solutions. Site responsive and creative alternatives are encouraged by this program’s design.
The key aspect of the plan that I support is clear, prescriptive intentions for how the urban space should look and function, with specific actions that can be taken to satisfy the goals.	BF	Noted.

buildings should incorporate articulated front and side walls, minimizing long stretches of flat surface.	JE	Building design standards in the Code include articulation provisions. This program will establish methods to have meaningful design responses that are not formula-driven.
most important, will be predictability. Shared understanding between the City and Developers about whether the new guidelines are advisory (our understanding) or code they will be held to will be crucial.	KR	Comment noted. We agree that predictability is key to the program success. The guidelines are intended to provide a range of design approaches acceptable to meet approval criteria, but not proscribe specific solutions. Moreover, we appreciate the commentor’s ongoing coordination with staff regarding projects already in the design process. See also Effective Dates, below.
TOPIC D: Tree Canopy		
Protect... the existing mature trees [and] plans for planting and maintaining new trees. ..ensure that a healthy tree canopy is a top priority.	GR	<p>We agree that early design guidance can be a valuable forum for exploring site plans and building arrangements that can preserve on-site trees. In addition, street tree and other tree planting can be an important strategy for shading pavement and structures alike. The proposed Urban Design Project Review process will create opportunities <i>early in the design process</i> to identify potential conflicts and support creative alternatives for tree canopy.</p> <p>In addition, staff are recommending adding to the proposed Departures process a specific reference to preservation of trees as one basis for creative design approaches that might not otherwise be allowed under Code Standards.</p> <p>Staff also note that the design of capital projects and other programs well beyond this proposal’s limited scope will be necessary to grow the city’s overall tree canopy.</p>
Please prioritize the preservation of mature trees and provision of ample space for planting new trees.	FD	We agree. Please see response above.
Preserve every mature tree on private property as part of “design standards.”	HS	These proposed code amendments do not add such requirements.
The number of trees to be planted needs to be connected to the size of the development.	MW (w)	Tree planting quantities are not part of the code provisions considered for amendments in this process.

("Trees to toilets") and those need to be shade trees.		
TOPIC E: Board Composition		
Opposition to non-Tacoma residents as eligible to Urban Design Board roles.	PC-AS	Staff understand Planning Commission Vice Chair Steele’s opposition to this element of the proposal. Other Commissioners have emphasized that, due to the technical nature of Board members’ role, the program should encourage participation of a wider population individuals who regularly conduct related professional work locally in Tacoma. Arguably, that volunteer interest should be engaged as a valuable asset to Tacoma and can take best advantage of professionals committed to good urban design. Furthermore, consultation with the City Clerk Office’s staff responsible for recruiting and preparing candidates for Council-appointed Committees, Boards, and Commission (CBC) emphasize the ongoing challenge of filling CBC positions with qualified volunteer members. For this reason, they recommend allowing the possibility of including non-residents (up to a certain maximum number) on the Board, as the timeline for new Council appointments is complex and lengthy, and could delay seating a complete and functional Board.
I urge you to also include a representative from District 1 and District 2.	GR	Geographic diversity on the Urban Design Board is an important priority built into the program proposal. We agree that the goal of diversity should be clearly presented and built into the program. While staff is confident that neighborhood residents from higher opportunity areas, higher levels of formal educational attainment and overall privilege will undoubtedly present themselves as candidates for the Urban Design Board (UDB), we do recommend modifying the composition of the Board to include minimum participation from all Council Districts.
Urban Design Board needs to be more community members from each district, to better balance “design professionals” with community voices.	HR	We agree each District should be represented on the Urban Design Board.
I worry about a design review board ...will only approve and reflect one small part of Tacoma...	DF	We agree that diversity should be clearly presented and built into the program. For that reason, we have proposed a minimum number of Board members be selected by City Council from those parts of Tacoma more

the safe, tried, and true conservative white male culture. Different cultures have very different ideas of beauty and design.		associated with cultural and socioeconomic diversity, not just from the areas of highest opportunity.
I agree that there should be equitable participation on the Review Board. City could appoint 2 representatives from each council district who will serve on the Board when a development in their district comes up for review. These board members would specifically represent district residents, rather than doubling up to represent development, heritage, transit, etc.	FD	As recommended, Council appointment to the Board requires an outreach and public education process, a formal recruitment, application and interview processes that require time to be thoughtful, and therefore could not efficiently be “restarted from scratch” in a timely manner for each individual project review. For that reason, a Board of standing membership will be necessary to conduct the work in a timely and predictable way.
Where is the Design Committee?? And who is on it?	JQ	The proposal includes a new Council-appointed Urban Design Board. The proposal identifies a range of expertise and geographic diversity to be included in the new Urban Design Board. Staff are including modest adjustments to the Board composition as a result of public review comments received.
TOPIC F: Code Amendments		
The process would be more conducive to approving a project assuming it was consistent with the uses consistent with the neighborhood and even if variances were required, they would be addressed in the evaluation/approval of the overall project and avoid endless bureaucratic wrangling over individual applications for variances and other relief thereby reducing costs for all concerned, while protecting the interests of others in the neighborhood given the nature of the project at large.	TW	Comment noted. We agree that the proposal’s provision of clear and predictable permit process, while allowing flexibility for “better than minimal” proposals, is a benefit.
Concerned about how code requirements might negatively impact development of small/moderate-sized sites (25, 50, 75 ft.-wide).	DFo(o), (w)	Comment noted. See discussion above about possible revisions to draft amendments.

Suggests further review of existing and proposed standards related to amenity space, light and air access, weather protection, parking requirements, bike parking, and driveway widths.		
Yard/Amenity Space		
Do not support renaming “yard space” as “amenity space” or encouraging shared, common spaces, including interior spaces.	JE	Comment noted.
Do not support yard/amenity space exemptions.	JE	Comment noted. To clarify, staff notes yard/amenity space exemptions currently exist and the proposed amendments would scale back some elements of the current exemptions.
Please clarify how yard/amenity space exemptions would occur. Do exemptions have the potential to increase building height? Is this commonly accepted in other municipalities?	JE	Please see the description of how the current and proposed exceptions/reductions work above. The exceptions/reductions alone do not increase the maximum height of a development. Based on brief review of other cities’ yard/amenity/open space requirements, these requirements vary and are often reduced in designated growth centers, like Tacoma’s Mixed-Use Centers, where developments of greater density and scale are expected and desired.
Do not support emphasis on shared, common spaces or reliance on public parks and thinks residents should have access to private outdoor space. Desires more information about yard/amenity space exemptions.	JQ	Comment noted. Please see the description of how the current and proposed exceptions/reductions work above.
Explain the yard space changes and exception provision.	PC-RK	Please see the description of how the current and proposed exceptions/reductions work above.
Concerned about how revised amenity requirements and exceptions might negatively impact development of small/moderate-sized	DFo(w)	Comment noted. See discussion above about possible revisions to draft amendments.

multifamily projects, resulting in fewer units or no longer being financially feasible.		
Interior Amenity Space description is too vague.	DFo(w)	Comment noted.
<p>Suggested Amenity Space changes:</p> <ul style="list-style-type: none"> Exempt all X District projects 20 units or fewer Allow walkways to be included Allow a 10' min dimension in certain cases for common amenity spaces 	DFo(w)	<p>Comment noted.</p> <p>Staff notes:</p> <ul style="list-style-type: none"> See discussion above about possible revisions to draft amendments. Walkways may be part of an eligible outdoor amenity space subject to other qualifying features. The 15' minimum dimension for common amenity space is the existing standard and amendment is not currently proposed.
Building Design Standards		
Does not support design standards that “attempt to legislate aesthetics.” Cited sections include: Ground Floor Façade Details and Articulation and Building Form and Expression Façade Articulation and Roofline Design.	DFo(o), (w)	Comment noted.
Tacoma doesn't need such extensive Building Design Standards.	DFo(w)	Comment noted.
The fact is that missing middle projects (~15 units on 6000 SF lots or similar) need a break and these new rules are a big step backward.	DFo(w)	Comment noted.
<p>Weather protection: Sees intent of these requirements to be reasonable but has concerns about the draft requirements.</p> <p>Specific concerns cited include:</p> <ul style="list-style-type: none"> To require private sidewalks, walkways and amenity spaces to have a 5' deep canopy regardless of building use or specific site conditions is not reasonable. 	DFo(w)	<p>Comment noted.</p> <p>Staff notes:</p> <ul style="list-style-type: none"> The provisions cited are generally consistent with current requirements and the proposed amendments do not represent substantively new requirements.

<ul style="list-style-type: none"> Elsewhere in the code, 75% of amenity areas are required to be uncovered, so this rule creates a rabbit hole. 		
<p>Building Transitions:</p> <ul style="list-style-type: none"> A 2 foot grade change at entrances is in direct conflict with accessibility requirements (wheelchair access). Hard paving requirement might work in some cases but in other cases landscaping may be desirable. In summary, this entirely new section is an attempt to impose specific design details and should be deleted. 	DFo(w)	<p>Comments noted.</p> <p>Staff notes:</p> <ul style="list-style-type: none"> The grade change referenced describes one of three building transition options and a grade change is not required. The hard surfacing requirement is intended to better ensure consistent access to the public benefits provided by weather protection.
<p>Transparency: The intent here is understandable but the requirements are poorly considered. Specific concerns cited include:</p> <ul style="list-style-type: none"> A project located on a Pedestrian Street would require an interior-courtyard-facing bike room (or any ancillary use) to have 35% transparency. 	DFo(w)	<p>Comments noted.</p> <p>Staff notes:</p> <ul style="list-style-type: none"> The proposed draft would require ground floor walls containing a residential or ancillary use (including a bike storage room) facing an interior courtyard to provide at least 15% of transparency. To be clear, it does not necessarily require transparency along the walls containing ancillary uses but these areas are included for the purposes of determining the total amount required and that the minimum amount of windows and doors can be provided elsewhere on the façade. 35% transparency is only required along walls facing a designated Pedestrian Street. Where there is a common amenity space (meeting minimum requirements) between the building and the Pedestrian Street, the 15% requirement would apply.
<p>Blank Walls: Sees intent of these requirements to be reasonable but has concerns about the draft requirements. Specific provisions were cited regarding what constitutes a blank wall and the effectiveness of the blank wall treatment options.</p>	DFo(w)	<p>Comments noted.</p> <p>Staff notes:</p> <ul style="list-style-type: none"> The provisions cited are generally consistent with current requirements and the proposed amendments do not represent substantively new requirements. The option of adding windows or doors to treat blank walls was removed because if windows or doors are added, by definition the wall ceases to be a “blank wall” thereby blank wall treatment is no

		<p>longer necessary. Therefore, this option does not seem like blank wall treatment so much as a solution to no longer needing blank wall treatment.</p> <ul style="list-style-type: none"> The provision of artwork was added as a blank wall treatment option.
<p>Building Form and Expression</p> <ul style="list-style-type: none"> Facade Articulation: This section is an attempt to legislate aesthetics and should be deleted, not least because it is highly biased toward “historic/traditional” design details. 	DFo(w)	Comments noted.
<p>Building Form and Expression</p> <ul style="list-style-type: none"> Mass Reduction: Light and Air Access is overly restrictive for mid-size lots which do not have the space. Also, this section falls under the Mass Reduction section which doesn’t make sense. New light/air access standards will sacrifice another unit if not more. 	DFo(w)	<p>Comments noted.</p> <p>Staff notes:</p> <ul style="list-style-type: none"> The draft Light and Air Access standards replace the current “solar access” standards. The draft language reduces the required setback for side-facing units from 15 ft. to 8 ft. The draft language also more specifically addresses interior spaces such as courtyards or light wells. The draft standards only apply to developments that have more than 60 feet of frontage along streets, open space, or parking areas whereas the current solar access standards have no such applicability threshold and are applicable to all developments. Staff believe the draft requirements better address smaller development sites than current requirements.
<p>Building Form and Expression</p> <ul style="list-style-type: none"> Roofline Design: This section is an attempt to legislate aesthetics and should be deleted 	DFo(w)	Comment noted.
<p>Building Form and Expression</p> <ul style="list-style-type: none"> Transparency seems to be redundant/in conflict with 3.e 	DFo(w)	Comment noted but staff could not identify the conflict cited.
Tacoma appears to be on a path to building large blocks of multi storied buildings without any	JQ	<p>Comment noted.</p> <p>Staff notes:</p>

suggestion of design. Other Pacific NW cities have limits on the expanse of flat surface on all sides of buildings.		<ul style="list-style-type: none"> The City currently employs design standards that include some amount of vertical building modulation. These provisions are generally retained in the draft proposal.
Misc.		
Code Formatting: Please, reformat the code so that the code section appears in a footer or header on every page. Navigating the code is impossible right now.	DFo(w)	Comment noted.
<p>Suggested future study items:</p> <ul style="list-style-type: none"> Parking reductions: “Phantom” parking reductions. The code supposedly allows up to a 50% reduction in X-Districts when transit is close by but requires the transit to have a 20 minute headway. There are currently NO buses in Tacoma with a 20 headway so this reduction is actually not available. Driveway widths: With more parking required, the parking gets pushed onto the site with a 20’ driveway requirement. (Seattle allows just 10’.) This represents literally 40% of the width of a 50’ lot given up for a driveway. A 3 story building can easily lose 3 units. Bike parking: at 1 space/unit literally takes up the footprint of a unit. 	DFo(w)	Comments noted.
TOPIC G: Effective Dates		
How are projects “in-process” affected by the program?	PC-BM	Effective dates would be determined for both the Urban Design Project Review and TMC amendments at the time of City Council adoption. This “grace period” would allow people who are in the design process to make any

		necessary adjustments prior to making application and hopefully avoid any unnecessary surprises.
Explain/explore implementation of a grace period.	PC-BS	See comment above.
For the purposes of determining Urban Design Project Review applicability, it is suggested vesting be made at the time of pre-application review to avoid having to take projects that are well into design through concept design review, which could be incredibly costly and possibly detrimental to a project.	KR	Comment noted. Generally, vesting for either a building permit or land use permit takes place at the time an application is deemed complete and not at the time of pre-application or earlier, less-formal communications. Staff do not expect that to change for the launch of the UDPR program. That being said, staff would like to be available to conduct early, predevelopment review and guidance during the period between adoption and UDPR program effective dates to help streamline the program's initial rollout. Projects that are well beyond the concept phase are encouraged to try to submit building permits prior to the effective date to avoid delays. Unfortunately, it is likely some projects will be awkwardly caught up during the transition time and will experience some amount of delay, but staff are committed to making the program's launch as smooth as possible.
Please include a transition period of at least six months.	DFo(o), (w)	Comment noted.

Initials	Name	Initials	Name	Initials	Name
PC-AS	Planning Commission Vice Chair Steele	JE	Jane Evancho	JQ	Judi Quilici
PC-MD	Planning Commissioner Dorner	BF	Ben Ferguson	KR	Katie Randall
PC-RK	Planning Commissioner Krehbiel	DF	David Fisher	YR	Yonik Rendu
PC-BM	Planning Commissioner Marlo	DFo (w)	David Foster (written)	GR	Georgette Reuter
PC-BS	Planning Commissioner Santhuff	DFo (o)	David Foster (oral)	HS	Heidi Stephens
RB	Reggie Brown	JJ	Jonathan Jarmon	MW (o)	Martha Webb (oral)
ZC	Zack Campbell	KK	Karen Kelly	MW (w)	Martha Webb (written)
FD	Felicity Devlin	SK	Scott Kubiszewski	TW	Tom West
CD	Chris Dunaski				