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April 5, 2021

Planning Commission
Tacoma Municipal Building, Rm. 16
747 Market Street
Tacoma, WA 98402

Dear Chair Petersen and Commissioners:

Historic Tacoma recognizes Tacoma's desperate need for more low-income and homeless housing and support those efforts actually addressing it. However, we have serious reservations about the Home in Tacoma changes as currently proposed and the way the city is justifying it. The proposal documents are laced with unsupported claims to address this grave housing crisis, affordability and equity. These same questionable rationales were cited to justify the 2007 creation of Mixed-Use Centers that have been demonstrably unsuccessful. Since 2010, a mere 109 affordable units have been created, and none of the large apartment buildings built or proposed in the Proctor and Stadium MUCs have contained a single affordable, much less low-income unit, yet all received tax incentives. Nowhere is this failure acknowledged, much less addressed. The current proposal is more of the same failed, market-oriented, pro-development practices that will only create more luxury apartments and drive gentrification across the city. Seattle followed this same approach that has resulted in a glut of expensive housing units but little added at the much needed low end. Tacoma must do better.

The Home in Tacoma proposal is confused and lacks sufficient detail for a reasonable judgement. First, it is a proposal to switch from zone-based land use regulation to form-based regulation. We agree that form-based regulation has many benefits, if it is done well with a strong set of detailed design standards and public review process to provide consistency and ensure compatibility with the unique character of Tacoma's neighborhoods. However, Home in Tacoma provides nothing about the design standards for each building type, how they would be developed and assessed or how the design review process would be implemented to ensure public input and transparency. In the absence of clearly defined policies regarding the development of design standards, their continued assessment and modification, public review process and enforcement, we only have city employees' weak claims that some undefined process with set design parameters, scale and character of Low-scale and Mid-scale Residential property types will "fit" into largely one to two story neighborhoods. There is some acknowledgement toward "fit harmoniously with," "compatibility with," and "responsive to" existing neighborhoods, but nowhere are any of these vague references defined and elaborated in policies. Nor do any policies

address how “neighborhood patterns” will be defined, by whom and with what neighborhood input.

At the very least, Policy DD 1-4 should be amended to require development of a city-wide, design review process that supports individual neighborhood identity, scale and historic appearance, that encourages public and especially neighborhood input, and that promotes high-quality design and building materials. Additionally it should require identifying the boundaries of unique residential neighborhoods, their design characteristics and development pattern from which to develop neighborhood-specific design standards. It should abjure any quick administrative-only review based on one-size-fits-all, cookie-cutter standards developed without neighborhood input.

Nowhere do any policies address how new Low-scale or Mid-scale development will be dispersed through neighborhoods to ensure neighborhood blocks are not overwhelmed by gentrifying property values and developer pressure to sell. Nowhere do any policies address how the city will direct new development to areas currently with low density or greatest need. That all appears left to market forces that will seek always to maximize extracting profit.

Historic Tacoma is especially concerned that the Mid-scale Residential proposal will endanger huge swaths of Tacoma’s historic and cultural resources. Most bus routes and transportation corridors in Tacoma follow its early streetcar routes, along which its earliest development occurred. Reference is made to “avoid creating incentives for demolition or within historic districts” but with no indication of how that will be done. Therefore, Tacoma’s demolition review process must be expanded immediately to include all buildings in all Low-scale and Mid-scale areas as it is now in all MUCs. Policies are needed to ensure that the city undertakes concerted and well-funded efforts to identify historic resources and pro-actively list individual landmarks and create small historic districts where appropriate.

Oddly Tacoma’s historic districts are not even referenced as “sensitive areas” in the proposal although there are vague references to protecting them. The best way to protect historic districts is to allow only Low-scale Residential development within them. Also MUC boundaries need to be reassessed and redrawn so that, for example, the historic E. Wright Avenue area of McKinley Hill or the six contiguous blocks of the Stadium-Seminary National Register Historic District are excluded from development pressure.

Home in Tacoma repeatedly refers to “smooth transitions” from MUCs to correct a fatal flaw in the current MUCs. In the original MUC proposal citizens were assured that a “transition zone” would be within the MUC where it belongs by limiting height bonuses to within 200 ft. of an MUC’s core. But that transition zone was eliminated at the last minute by City Council without citizen input on July 14, 2009, thus causing the current outrage in Proctor. Instead Home in Tacoma simply proposes making the entire city one huge “transition zone”.

To its shame Tacoma has the least tree canopy and the least access to open space of any municipality in the Puget Sound Region. Nowhere does the current proposal address this growing crisis, yet it refers repeatedly to “shared” open spaces and yards but makes no provision for creating more. In fact it exacerbates the problem by allowing surplus land ONLY to be used for “mixed-use housing” (Policy H-4.2) with no thought for creating desperately needed open space, especially in areas like the Proctor MUC that was already designated as lacking open space before its four new large apartment buildings were developed. The proposal refers only to “street trees” as if small replacement saplings in parking strips adequately compensate for the loss of mature trees on parcels. McKinley and Lincoln

neighborhoods are seeing increased loss of tree canopy as absentee landlords and developers scrape parcels to maximize profit extraction. This proposal needs a policy that strongly protects mature trees on parcels and in city right of way.

In short, Historic Tacoma believes that the Home in Tacoma is being rushed through without adequate study or real citizen input. What has been provided is simply inadequate to allow citizens to make an informed judgement of the actual consequences of what is proposed. Moreover, pushing this proposal through based on a poorly designed “push” survey and during a COVID lockdown has substantially limited the opportunities for Tacoma’s citizens to provide earnest input in this process. We request that additional analysis and policies be developed along the line we have suggested prior to asking citizens to accept a vague proposal that will have profound and long lasting impact on Tacoma’s neighborhoods.

Sincerely,

Kathleen Brooker, Board President