INTRODUCTION

The Tacoma Mall Neighborhood is located near the center of Tacoma just south of the intersection of I-5 and SR 16. It contains the Tacoma Mall Regional Growth Center (RGC), one of 16 Mixed Use Centers designated by the City and one of two Regional Growth Centers designated by the Puget Sound Regional Council (PSRC) within Tacoma. The 485-acre RGC is intended to accommodate a significant share of the City’s growth and to receive priority when applying for certain types of regional funding. The City’s growth targets for the RGC reflect this. The City is planning for about 8,100 more people and 7,600 new jobs in the RGC by 2040. The City is considering expanding this area to the 601-acre study area shown in Figure LU-1. The growth assumptions for the study area are about 8,900 new residents and 8,400 new jobs by 2040. These would replace the existing RGC growth targets.

There are currently approximately 3,800 people and 8,300 jobs in the study area (3 Square Blocks, 2016). The current RGC also has approximately 3,800 people, due to the fact that there are few residential uses in the expansion area, and about 7,200 jobs (PSRC, 2014). The growth planned for both the study area and RGC means that by 2040 there will be about three times as many people and twice as many jobs as exist today.

STUDY AREA

The borders of the study area and the current RGC are shown in Figure LU-1. The study area has the same southern border as the RGC, except it extends one block farther to the west to South Tacoma Way. From South Tacoma Way and S 48th St, the study area border goes up S Tacoma Way to S 43rd St, then up S Union Ave, then follows S Tacoma Way again northeast until S Wright Ave, where it follows the curve of a hill to S Sprague Ave. The border runs south down S Sprague Ave and then west along S 35th St to connect with the northeast portion of the RGC border. The remainder of the eastern border of the study area is the same as the RGC border, running between Costco and the Titus Will automobile dealerships and then along I-5.

The southwest corner of the RGC is at S 48th St and the alley between S Puget Sound Ave and S Union Ave. From there the border goes north to S 40th St, jogs east, goes north on S Warner St, east on S 38th St, north on S Lawrence St, east on S 36th St, north on S Pine St and east on S 35th St. The border cuts south from S 35th St between the Costco and Titus Will automobile dealerships and then generally follows Interstate 5 to S 49th St. From there, it follows the line of S 49th St west to S Oakes St, goes north along S Oakes St, and continues west along S 48th St.
The study area and the RGC can together be divided into four quadrants by two major roads that bisect the Tacoma Mall Neighborhood: S Pine St and S 38th St (Figure LU-1). Each quadrant has a distinct character that is consistent between the study area and the RGC.

**EXISTING LAND USE**

The existing land use pattern in the study area is shaped by the Tacoma Mall’s role as a regional retail destination and by the South Tacoma Way corridor’s industrial character. Retail is one of the primary land uses and includes small- and large-format retailers. Retailers are primarily located in the northwest, northeast and southeast quadrants, near the Tacoma Mall and major roads such as S 38th St and S Steele St (Figure LU-2). Office uses and industrial uses, including warehousing and manufacturing, are interspersed with retail uses. The study area has more industrial uses compared to the RGC and these uses are located near South Tacoma Way. In general, retail, office and industrial buildings are low-rise and are located on large lots with surface parking.

Residential uses make up the majority of the southwest quadrant and include a mix of single family detached, single family attached (duplexes/triplexes/townhomes) and apartment buildings. In the southeast quadrant there are apartment buildings north of the mall as well as a few single family uses. In the northeast quadrant, there are single family detached and single family attached homes in the Lincoln Heights Neighborhood north of Costco and off S 37th St. There are a few single family residential uses in the northwest quadrant.

Other land uses in the study area include government and educational uses, vacant lands, parks and other community and public uses. Government and educational uses include the Tacoma Police Department Headquarters and fleet services facilities, Pierce County Annex Building (which is included in the study area but not the RGC), Tacoma Public Schools facilities that provide specialized programming and bus storage at the Madison School site, and the United States Postal Service general mail and distribution facilities. Vacant lands are distributed throughout the study area. Parks are located in the northeast and southwest quadrants. The northeast quadrant contains Lincoln Heights Park. The southwest quadrant contains a community garden located at the Madison School site, and the northernmost part of South Park (which is located in the study area but not the RGC). Other community and public uses include utility facilities, transit facilities and churches.

Table LU-1 shows the amount of different types of existing uses in the study area and RGC. The most common use in both areas is commercial, followed by multifamily residential. Both areas generally have the same proportions of existing uses, with the exception of industrial uses. There are roughly five times as many industrial uses in the study area as in the RGC.
Table LU-1. Existing Land Uses

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Study Area (Acres)</th>
<th>% of Total</th>
<th>RGC (Acres)</th>
<th>% of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commercial</td>
<td>255</td>
<td>42%</td>
<td>228</td>
<td>47%</td>
</tr>
<tr>
<td>Multifamily Residential</td>
<td>76</td>
<td>13%</td>
<td>74</td>
<td>15%</td>
</tr>
<tr>
<td>Government/Education</td>
<td>44</td>
<td>7%</td>
<td>33</td>
<td>7%</td>
</tr>
<tr>
<td>Single Family Residential</td>
<td>32</td>
<td>5%</td>
<td>30</td>
<td>6%</td>
</tr>
<tr>
<td>Industrial</td>
<td>33</td>
<td>5%</td>
<td>5</td>
<td>1%</td>
</tr>
<tr>
<td>Vacant/Developable</td>
<td>18</td>
<td>3%</td>
<td>15</td>
<td>3%</td>
</tr>
<tr>
<td>Parks</td>
<td>6</td>
<td>1%</td>
<td>3</td>
<td>1%</td>
</tr>
<tr>
<td>Other Uses</td>
<td>21</td>
<td>3%</td>
<td>17</td>
<td>4%</td>
</tr>
<tr>
<td>Areas Outside of Tax Parcels (including Rights-of-Way)</td>
<td>117</td>
<td>19%</td>
<td>81</td>
<td>17%</td>
</tr>
<tr>
<td><strong>Total Acres</strong></td>
<td><strong>601</strong></td>
<td>—</td>
<td><strong>485</strong></td>
<td>—</td>
</tr>
</tbody>
</table>

Source: 3 Square Blocks, 2016; Pierce County Assessor Data, 2014

**Surrounding Uses**

Uses surrounding the study area and the RGC are similar. The study area’s northern border is within the City’s designated South Tacoma Manufacturing and Industrial Center, and the RGC’s northern border is adjacent to it. Uses in this area of the South Tacoma Manufacturing and Industrial Center include industrial, retail, office, public and institutional uses, transportation and vacant lands. This mix of land uses continues around the western side of the study area and RGC, and there are some residential uses adjacent to the RGC’s western border as well. Heavy industrial and commercial uses are closer to the study area border than to the RGC border. One reason for this is that the study area includes the slope of the Nalley Valley that drops down to S Tacoma Way as well as some of the valley floor. There is an active rail line running through the Nalley Valley that adds to the industrial character of the area and provides Sounder Rail service between Tacoma and Lakewood.

The mix of uses around the southwest corner of the study area and RGC includes residential, industrial, retail, office, public and institutional, transportation and vacant land uses. The northern portion of South Park is located in the southwest corner of the study area, just outside of the RGC, and continues to the south. The Tacoma Mall Cemetery and Oakwood Hill Cemetery are just east of here. Land uses between the cemeteries and the southeast corner of the study area are primarily single family residential. Exceptions include low-rise apartment uses located at the northeast corner of the Tacoma Cemetery and a few retail and office uses concentrated along Tacoma Mall Blvd. The majority of the eastern border of the study and RGC is adjacent to Interstate 5. There is a small area between the northeast border and Interstate 5 characterized by a mix of retail and utility uses including automobile dealerships and a Sprint switching center.

**Critical Areas**

Tacoma Municipal Code (TMC) Chapter 13.11 defines critical areas including critical aquifer recharge areas, fish and wildlife habitat conservation areas, flood hazard areas, geologically hazardous areas, stream corridors and wetlands. It contains development regulations based on Best Available Science
that are intended to protect and preserve critical areas. These regulations apply to development activities within potential or known critical areas.

City of Tacoma Planning and Development Services staff provided information in February of 2016 about critical areas in the study area. The entire study area is designated as an Aquifer Recharge area and is subject to the provisions of TMC 13.09.010. There are no known wetlands or streams in the area. There are no known flood hazard areas within the study area. There is a small area just outside the northeastern boundary of the study area which is within the 500 year Flood Zone Overlay. This site is an engineered stormwater pond located northwest of the intersection of I-5 and S 38th St. There are no known priority species or habitats mapped by Washington Department of Fish and Wildlife (WDFW) for the area.

There are several Garry oaks located just within the western boundary of the study and east of S Tacoma Way. TMC 13.11 does not have protection measures specific to Oregon white oak (Garry oak) but does require protection for priority habitats. WDFW considers stands of Oregon white oak as priority habitat and the City would require protection for a stand. In an urban environment, single oaks or small stands can be considered when they are valuable to fish or wildlife. The City typically asks for assistance from WDFW in determining if an individual or small group of oaks is valuable.

There are small isolated areas with slopes greater than 25 percent in the study area. Classification of geologically hazardous areas is dependent on criteria in addition to percent slope, and the areas within the study area with greater than 25 percent slope cannot be determined to be geologically hazardous without more information about site conditions. If they were determined to be geologically hazardous areas there could be restrictions for the location of buildings or residences.

Future development activities are subject to critical areas review.

**ZONING**

There are four zoning designations within the study area and two within the RGC, as shown in Figure LU-3. These include the Urban Center Mixed-Use (UCX), Residential Commercial Mixed-Use (RCX), Neighborhood Mixed-Use (NCX) and Light Industrial (M-1). The majority of the study area is zoned UCX, and all quadrants include this zoning designation. The portions of the study area not included in the RGC in the southwest, northwest and northeast quadrants are zoned M-1, with the exception of a small area south of S 47th St which is zoned NCX. The remainder of the area, including most of the southwest quadrant, is zoned RCX.

Title 13 of the City of Tacoma Municipal Code establishes zoning regulations. Section 13.06.300 defines the purpose of the UCX zone as follows:

*To provide for a dense concentration of residential, commercial, and institutional development, including regional shopping centers, supporting business and service uses, and other regional attractions. These centers are to hold the highest densities outside the Central Business District. An urban center is a focus for both regional and local transit systems. Walking and transit use is facilitated through designs which decrease walking distances and increase pedestrian safety. Residential uses are encouraged in UCX Districts as integrated development components.*

The maximum height of structures in the UCX zone is 75 feet, or 120 feet if at least 25 percent of floor area is residential or if Transfer of Development Rights (TDR) credits are used. The maximum floor area
in the UCX zone is 45,000 square feet per business for retail uses, unless a greater amount is approved with a conditional use permit. The minimum density of housing units for residential developments is 40 units per acre; mixed use projects containing residential units are exempt from this requirement (Tacoma Municipal Code 13.06.300).

The purpose of the RCX zone is defined in the Tacoma Municipal Code as follows:

To provide sites for medium- and high-intensity residential development in centers, with opportunities for limited mixed use. This district is primarily residential in nature and provides housing density on the perimeter of more commercial mixed-use zones. Commercial uses in this district are small in scale and serve the immediate neighborhood. These uses provide opportunities for employment close to home. This district frequently provides a transition area to single-family neighborhoods.

The maximum height of structures in the RCX zone is 60 feet. Through the City’s X-District Height Bonus Program, maximum heights of 70 feet or 80 feet may be allowed in certain areas. The maximum floor area in the RCX zone is 30,000 square feet per business, or 45,000 square feet for full service grocery stores. The minimum density of housing units for residential developments is 30 units per acre, or 40 units per acre on designated pedestrian streets. There is one designated pedestrian street in the RCX zone in the study area: the South 47th/48th Transition Street which runs east to west near the southern border of the study area (Tacoma Municipal Code 13.06.300).

The purpose of the NCX zone is defined in the Tacoma Municipal Code as follows:

To provide areas primarily for immediate day-to-day convenience shopping and services at a scale that is compatible and in scale with the surrounding neighborhood, including local retail businesses, professional and business offices, and service establishments. This district is intended to enhance, stabilize, and preserve the unique character and scale of neighborhood centers and require, where appropriate, continuous retail frontages largely uninterrupted by driveways and parking facilities with street amenities and direct pedestrian access to the sidewalk and street. Residential uses are encouraged as integrated components in all development.

The maximum height of structures in the NCX zone is 45 feet. Through the City’s X-District Height Bonus Program, maximum heights of 65 feet or 85 feet may be allowed in certain areas, including the adjacent S 56th and S Tacoma Way Center. The maximum floor area in the RCX zone is 30,000 square feet per business, or 45,000 square feet for full service grocery stores. The minimum density of housing units for residential developments is 30 units per acre, or 40 units per acre on designated pedestrian streets. There is one designated pedestrian street in the NCX zone in the study area: S Tacoma Way (Tacoma Municipal Code 13.06.300).

The purpose of the M-1 zone is defined in the Tacoma Municipal Code as follows:

This district is intended as a buffer between heavy industrial uses and less intensive commercial and/or residential uses. M-1 districts may be established in new areas of the City. However, this classification is only appropriate inside Comprehensive Plan areas designated for medium and high intensity uses.

The types of uses allowed in the M-1 zone include a range of light industrial uses that are different in character from those allowed in the other three mixed-use zones in the study area. Residential uses are
limited. The maximum height of structures in the M-1 zone is 75 feet in most cases. There is no maximum lot coverage (Tacoma Municipal Code 13.06.400).

The study area and RGC are located within the South Tacoma Groundwater Protection District zoning overlay (STGPD). The STGPD zoning overlay is designed to prevent the degradation of groundwater in the South Tacoma aquifer system by controlling the handling, storage and disposal of hazardous substances (Tacoma Municipal Code 13.09.010).

The study area, but not the RGC, is within the South Tacoma Manufacturing/Industrial Center zoning overlay. The ST-M/IC zoning overlay is intended to protect industrial and manufacturing uses for the long-term by placing restrictions on incompatible uses (Tacoma Municipal Code 13.06.400).

**Surrounding Zoning**

The area surrounding the study area has a range of zoning designations. In general, the majority of lands to the north and west of the study area are zoned industrial and the majority of lands to the south and east are zoned residential with some limited commercial zoning. The specific zoning designations surrounding the study area and RGC are described below.

Lands to the north and west of the study area and RGC are zoned M-1 and Heavy Industrial (M-2) and are primarily located within the South Tacoma Manufacturing/Industrial Center zoning overlay (ST-M/IC). Due to the differences in boundaries between the study area and the RGC, the study area is closer to the M-2 uses.

Surrounding zones to the southwest of the study area and RGC include M-1, M-2, Community Commercial (C-2), NCX, RCX and Commercial Industrial Mixed-Use (CIX). The Tacoma Cemetery and Oakwood Hill Cemetery south of the study area and RGC are zoned Two Family Dwelling (R-3). New cemeteries are not permitted in this zone but existing cemeteries may be expanded with conditional use permits (Tacoma Municipal Code 13.06.100). Immediately east of the cemetery are two parcels zoned Low Density Multiple Family Dwelling (R-4-L) and Neighborhood Commercial (C-1). The majority of lands south of the study area and RGC are zoned Single Family Dwelling (R-2), however there are a few parcels to the southeast that are zoned C-1, C-2 and Transitional (T).

The predominantly R-2 zoning pattern continues around the eastern side of the study area and RGC until S 38th St. From here north, adjacent zones include M-1, C-2, R-3 and Multiple Family Dwelling (R-4).

All zones adjacent to the study area and the RGC are within the STGPD zoning overlay.

**FUTURE LAND USE**

The City of Tacoma’s Future Land Use Map illustrates the intended future generalized land use pattern in the City (Figure LU-4). The City updated the Future Land Use Map as part of the process of updating its Comprehensive Plan in 2015. The future land use designations were determined through analysis of urban form policies, existing land use and zoning, development trends, anticipated land use needs and desirable growth and development goals. Various types of zoning and land use may be permitted within each of the future land use designations (City of Tacoma Planning and Development Services, 2015).
There are four future land use designations in the study area and two in the RGC. They include the Tacoma Mall Regional Growth Center, Neighborhood Mixed Use Center, Light Industrial, and Parks and Open Space. The Tacoma Mall Regional Growth Center designation corresponds with the RGC boundary. The RGC also includes a Parks and Open Space designation that corresponds with Lincoln Heights Park. The southwest corner of the study area (outside of the RGC) contains lands designated Parks and Open Space that correspond with South Park, and also includes a small area designated Neighborhood Mixed Use Center that is inside of the current boundaries of the South Tacoma Way Neighborhood Mixed Use Center. The remainder of the study area is designated Light Industrial.

The Tacoma 2040 Comprehensive Plan defines future land use designations. The Tacoma Mall Regional Growth Center designation is specifically for the RGC and establishes a minimum allowable site density of 25 dwelling units per net acre. The Neighborhood Mixed Use Center designation applies to seven designated neighborhood mixed use centers in the City, including the South Tacoma Way Neighborhood Mixed Use Center that is located around S Tacoma Way and S 56th St and includes the Sounder South Tacoma Station. This area is also designated as the South Tacoma Business District. Vision 2040 also establishes a minimum allowable site density of 25 dwelling units per net acre. The Light Industrial designation allows for a variety of uses that have moderate scale and impact compared to heavy industrial uses. The Parks and Open Space designation is intended to conserve and enhance open, natural and improved areas that provide environmental and recreational benefits. Neither the Light Industrial nor the Parks and Open Space designation have density minimums.

**Surrounding Future Land Use Designations**

The areas adjacent to the study area and RGC have the following future land use designations: Light Industrial, Heavy Industrial, Neighborhood Mixed Use Center, Parks and Open Space, Multi-family (Low Density), Single Family Residential, Neighborhood Commercial and General Commercial. These designations roughly correspond with the previously discussed existing land use patterns and zoning designations around the study area and RGC.

**DEVELOPMENT CAPACITY**

Since 1997, Pierce County and its 23 cities and towns have worked collaboratively through the Buildable Lands Program to collect annual permitting data, inventory developable lands and meet Growth Management Act requirements to ensure that Urban Growth Areas are of sufficient size to accommodate anticipated population growth (Pierce County, 2014). The 2014 Pierce County Buildable Lands Report contains an estimate of the development capacity in the RGC. The report estimates that the RGC has the capacity to accommodate an additional 49,862 people and an additional 44,760 jobs. This estimate is based on number of factors including existing zoning designations, a definition of developable parcels and a set of assumptions about household size, unit size, lot coverage and square foot of floor space per employee (Pierce County, 2014). The 2014 Pierce County Buildable Lands Report does not provide an estimate of the development capacity in the portion of the study area outside of the RGC. It does provide general information suggesting that this area has employment development capacity but little residential development capacity, which is consistent with zoning and land use patterns.
The Buildable Lands Program maintains an inventory of vacant and underutilized land in Pierce County. Based on this inventory, approximately 55 percent of parcels in both the study area and the RGC are vacant or underutilized. Figure LU-5 shows the locations of these parcels.

Preliminary analysis by 3 Square Blocks suggests that the development capacity for the RGC estimated by the 2014 Buildable Lands Report is unlikely to be realized in the foreseeable future. Existing development patterns in the RGC have a much lower density than is allowed under current zoning regulations. For instance, zoning regulations allow buildings up to 60 to 120 feet but most buildings in the RGC are under four stories. Additionally, a number of parcels in the RGC identified as underutilized by the Buildable Lands Program are currently home to successful businesses.

**SOURCES**

City of Tacoma, Tacoma 2040 Comprehensive Plan, December 2015

Pierce County Planning and Land Services, Buildable Lands Report, June 2014

Puget Sound Regional Council (PSRC), Centers Monitoring Report, February 2014


Tacoma-Pierce County Health Department, GIS data and personal communication with staff, August–December 2015

3 Square Blocks, Analysis of existing land uses using 2014 Pierce County Assessor Data, January 2016

3 Square Blocks, Analysis of existing population and jobs in the study area using data from the PSRC Centers Monitoring Report and TAZ data for Tacoma from Fehr & Peers, January 2016
FIGURES

Figure LU-1. Study Area Quadrants
Figure LU-2. Existing Land Use
Figure LU-3. Zoning
Figure LU-4. Future Land Use
Figure LU-5. Vacant or Underutilized Parcels Identified by Pierce County’s Buildable Lands Program
Figure LU-1. Study Area Quadrants
Figure LU-2. Existing Land Use
Figure LU-3. Zoning
Figure LU-4. Future Land Use
Figure LU-5. Vacant or Underutilized Parcels Identified by Pierce County’s Buildable Lands Program