To: Planning Commission
From: Elliott Barnett, Planning Services Division
Subject: Tacoma Mall Neighborhood Subarea Plan and EIS
Meeting Date: October 4, 2017
Memo Date: September 28, 2017

On September 20, 2017 the Commission discussed the public input received during the comment period and provided direction on the substantive changes to be made to the draft Subarea Plan package prior to finalization. The purpose of this informational item is to communicate staff’s understanding of that list of changes. Staff intend to return on October 18, 2017 prepared to request final direction on the remaining decision points, along with the Commission’s recommendation to City Council on the final package.

On August 2, 2017 the Commission authorized the public release of the draft Subarea Plan, proposed code changes and streetscape design concepts, and Draft Environmental Impact Statement. The City hosted the August 30th Informational Meeting and September 6th Public Hearing, and staff participated in meetings with the Transportation Commission, Bicycle Pedestrian Technical Advisory Group, and City Council Infrastructure, Planning and Sustainability Committee. In addition, staff have spoken with community stakeholders as well as with City to departments which will be involved in implementation.

Attached please find a Recommended Changes Summary reflecting the Commission’s direction from the September 20th meeting, as well as further information on the remaining substantive items. In addition, the Issues and Recommendations table provided at the September 20th meeting is attached for easy reference. Our intent is to make sure that staff and the Commission are in concurrence on the remaining tasks. In addition, two comment letters received after the end of the comment period are attached.

Information about the project is available at www.tacomamallneighborhood.com. Please contact Elliott Barnett at (253) 591-5389, or email tacmallneighborhood@cityoftacoma.org with any questions.

Attachments:
1. Recommended Changes Summary (10/04/17)
2. Summary of Key Issues and Recommendations (09/20/17)
3. Additional comment letters

c. Peter Huffman, Director
Tacoma Mall Neighborhood Subarea Plan and EIS

RECOMMENDED CHANGES SUMMARY
Planning Commission – October 4, 2017

This table summarizes the Planning Commission’s direction from the September 20, 2017 discussion of the key themes of the public comments, along with some additional information on remaining substantive discussions items. Proposed changes are grouped into general categories according to the chapter structure of the Subarea Plan. Connectivity and pedestrian access standards are each summarized separately.

The intent of this summary is to further focus the remaining staff work and Commission discussion. At the October 18, 2017 Commission meeting, staff will present on the substantive items for which final direction is still required (identified below with red text).

<table>
<thead>
<tr>
<th>Recommended Changes Summary</th>
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<tbody>
<tr>
<td><strong>GENERAL:</strong></td>
</tr>
<tr>
<td>1. Non-substantive edits for clarity and consistency</td>
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<tr>
<td><strong>URBAN FORM:</strong></td>
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<tr>
<td>1. Reaffirm the paramount importance of establishing an urban vision, including the concept of the minimum 600 x 600 foot block scale, which could unfold in different ways</td>
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<tr>
<td><strong>LAND USE:</strong></td>
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<tr>
<td>1. Text and map changes to clarify the relationship between the Subarea, Downtown, and the South Tacoma Manufacturing/Industrial Center</td>
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<tr>
<td>2. Strengthen language calling for enhancements to City design review capacity</td>
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<tr>
<td>3. Update the Comprehensive Plan Urban Form Chapter for consistency with land use proposals</td>
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<td>4. Call for future review of Subarea Plan boundaries</td>
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<tr>
<td>5. Clarify language prohibiting front doors facing alleys</td>
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<tr>
<td>6. <strong>Madison District zoning approach</strong></td>
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<tr>
<td>Staff recommend the alternate zoning proposal, including optional height increases from 45 to 65 feet along Warner St and the Madison School site. At least one Low Impact Development bonus option would be required (two are included as MUC Height Bonus options). This approach balances green stormwater infrastructure, residential character and density goals.</td>
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<tr>
<td>7. <strong>Development Regulation Agreements</strong></td>
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<tr>
<td>The Commission will discuss the proposed criteria for DRA’s, including: Applicability: 2 acres sites; a minimum Floor Area Ratio of 1.0</td>
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# Recommended Changes Summary

**Public benefits pick list (a minimum number of points are required):**
Balanced economy; Sustainability; Quality urban design; Achieving vitality in the Tacoma Mall Neighborhood

## HOUSING:

### Affordable housing recommendations

1. About 90% of rental units are currently affordable at 80% of Area Median Income (AMI)/50% are affordable at 50% AMI
2. Increase Performance Measure to 50% affordable at 80%/25% affordable at 50% AMI
3. Call for a focused study in the near-term to identify actions to prevent involuntary displacement and maintain housing affordability and choice
4. Strengthen call for citywide housing actions

## TRANSPORTATION:

1. Identify strategy to coordinate with transit partners and WSDOT on implementation
2. Reflect WSDOT comments
3. Review proposed Performance Measures for consistency with the TMP
4. Call for near-term development of a neighborhood parking strategy
5. Call for restoring vacated roadways through gated apartment complexes
6. Show future extension of S. 38th Street west from South Tacoma Way
7. Add discussion of future improvements to the Water Flume Trail
8. Identify potential future Sounder Station location in NW District
9. **Revisions to Bike and Pedestrian network map**, including:
   - Remove Wright Ave as Bike Blvd
   - Add Cedar St from 35th to 36th St
   - Connect the Loop Road to 35th and South Tacoma Way
   - Extend 40th St bike route to Union Ave
10. **Revisions to projects prioritization list**, including:
    - Sidewalk Gaps – move to Near-term Project List
    - Move S. 35th St extension project to the Mid-term Projects List

## CONNECTIVITY PLANS:

### Staff recommend significant changes to the connectivity proposal

1. Modify Connectivity Plan process to accomplish the following:
   - Change “Connectivity Plan” to “Site Plan Approval” process
   - Integrate with existing process and appeal options
   - Increase thresholds to 10,000 sf new building footprint or 5,000 sf building addition
   - Provide for discretionary City review of project impacts
2. Modify Figure T-9: Priority New Connections Tiers Map including:
   - Show Tier 2 connection points
### Recommended Changes Summary

1. Extend proposed S 37th St to Fife Street
2. Update Transportation Choices Chapter and Land Use Appendix to reflect the revised approach

### PEDESTRIAN ACCESS STANDARDS:

**Staff recommend the following changes**

1. Clarify how proposal would apply to sites of varying size
2. Provide exemptions and exceptions for certain land uses
3. Reduce requirements for alterations valued between 15 to 50%
4. Reduce size of proposed through-connections (e.g., 14 feet or two 7 foot sidewalks)

### ENVIRONMENT:

1. Highlight significance of protecting the aquifer
2. Reflect final decision on Madison District zoning
3. Call for citywide green building review
4. Reference regulatory process for Gary Oaks

### COMMUNITY VITALITY:

1. Call for authentic community engagement on neighborhood name process
2. Clarify that parks principles and map are conceptual and aspirational
3. Call for further review on creating small scale open spaces with development
4. Engage with Metro Parks and Tacoma School Districts to clarify implementation approach

### SHARED PROSPERITY:

1. **Consider revisions to Catalyst sites criteria and map**
2. Integrate Community Attributes Inc key findings
3. Add action calling for city or public-private partnership on land assembly and/or redevelopment to catalyze private investment

### UTILITIES AND SERVICES:

1. Consult Solid Waste regarding recycling and food waste strategies

### IMPLEMENTATION:

1. **Develop an implementation tracking mechanism** in the EIS
2. Highlight the importance of funding actions, including study of an impact fee approach
3. Update Priority Early Implementation List to reflect final changes to Plan
Tacoma Mall Neighborhood Subarea Plan and EIS

Comments and Responses Summary (Discussion draft)

Planning Commission - September 20, 2017

This document updates the Summary of Key Themes provided in the 09/15/17 Planning Commission packet. It includes the key themes of all comments received through the end of the comment period. In addition, staff have provided recommendations for updates and refinements to the draft proposals. The intent is to request the Commission’s concurrence, or further direction, on the next phase of work on the project.

Comments are grouped into general categories according the chapter structure of the Subarea Plan. Since connectivity and pedestrian access standards received a lot of attention, they are each summarized separately.

<table>
<thead>
<tr>
<th>GENERAL COMMENTS:</th>
<th>RECOMMENDATIONS:</th>
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<tbody>
<tr>
<td>1. Support for City focus, investment and high level goals of the plan</td>
<td>A. Consider text updates, edits and clarifications reflecting these comments</td>
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<td>2. Avoid making anyone feel that they are losing through City actions</td>
<td>B. Integrate ongoing staff review for clarity, conciseness and consistency</td>
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<td>3. A plan for thoughtful growth is needed, it must be appropriate to market realities</td>
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<td>4. Clarify that this is a long range plan and an ideal vision</td>
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<td>5. Be clear regarding requirements vs. options, what is occurring with Plan adoption</td>
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<td>6. Edits and clarifications</td>
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<thead>
<tr>
<th>URBAN FORM:</th>
<th>RECOMMENDATIONS:</th>
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<tbody>
<tr>
<td>1. Support for creating a more positive image and identity, aesthetic improvements, walkable urbanism actions and transit-oriented development</td>
<td>A. Reaffirm minimum 600 x 600 foot block scale vision</td>
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<tr>
<td>2. Developments should include yard space (rather than front stoops)</td>
<td>B. Flexibility for larger scale development with pedestrian connectivity</td>
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<td>3. Different views of the vision for the Northwest District</td>
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<td>4. Large blocks can be a benefit to business recruitment efforts</td>
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<thead>
<tr>
<th>LAND USE:</th>
<th>RECOMMENDATIONS:</th>
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<tr>
<td>1. General support for proposed zoning and Regional Growth Center expansion</td>
<td>A. Reflect comments on planning context</td>
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<tr>
<td>2. Clarify relationship between the Subarea, Downtown, and the South Tacoma Manufacturing/Industrial Center</td>
<td>B. Finalize Madison District zoning</td>
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<tr>
<td>3. Strengthen design, landscaping and onsite open space development standards</td>
<td>C. Clarify front doors facing alleys approach</td>
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<tr>
<td>4. Questions regarding Subarea Plan boundaries (car dealerships not included)</td>
<td>D. Call for enhancements to City design review</td>
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<tr>
<td>5. More parking is needed in the neighborhood</td>
<td>E. Update Comp Plan Urban Form Chapter for consistency</td>
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<td>6. Front doors should not face alleys</td>
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<td>7. Permitted building heights are too high</td>
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<td>8. Make warehousing a permitted use at the Puget Sound Energy site</td>
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9. Limit the number of townhouses and/or make them more attractive/accessible
10. Question on the link between building height and green streets

**HOUSING:**
1. Concerns about involuntary displacement
2. Proposed affordable housing targets are too low
3. Add more information on current housing costs
4. Target the creation of housing affordable to lower incomes
5. Require and incentivize some units to be affordable
6. Provide senior/inter-generational housing projects in the area

**RECOMMENDATIONS:**
A. Consider affordability targets, reflecting goal of housing choice in all City neighborhoods
B. Consider further actions to promote affordability
C. Strengthen call for citywide housing actions

**TRANSPORTATION:**
1. Support for overall transportation approach
2. Transit station relocation, high capacity transit, Loop Road, I-5 offramp, and pedestrian improvements are high priorities
3. Proposed revisions to Near and Midterm project priorities
4. Question regarding benefits and alignment of the Loop Road
5. Differing perspectives on where the transit station should be located
6. Add an I-5 off ramp at 47th/48th Street
7. Proposed S. Wright should not be a bike boulevard
8. Better bike/ped link to South Tacoma Way/Water Flume Trail
9. Add a bike route on S. Puget Sound Ave.
10. Add a direct transit route to the Tacoma Dome Station
11. Various comments regarding street design
12. WSDOT clarifications regarding I-5 off ramp
13. Consider making some residential streets one-way
14. Pierce and Sound Transit plans and funding do not currently reflect the proposals
15. Identify a funding source for transportation projects

**RECOMMENDATIONS:**
A. Consider minor revisions to projects prioritization and bike/ped network
B. Add a near-term parking strategy action
C. Identify strategy to coordinate with transit partners and WSDOT on implementation
D. Reflect WSDOT comments

**CONNECTIVITY PLANS:**
1. Increasing connectivity is an important goal for this neighborhood
2. The proposal balances goals of preserving large parcels and increasing connectivity
3. The proposal would be an excessive burden, stifle development, take private property rights, and is too ambitious given current market realities
4. Proposed process is onerous and complex
5. Thresholds proposed are too low

**RECOMMENDATIONS:**
A. Modify Connectivity Plan process to accomplish the following:
   - Increased thresholds based on building footprint size
   - A clear, predictable process
   - Discretionary City review of project
### Tacama Mall Neighborhood Subarea Plan and EIS – Comments and Recommendations Summary 09-20-17

| 6. Opposition to proposed S. 37th Street and S. Wright Avenue |
| 7. Clarify City funding role |
| 8. City should pay for S. 37th Street if it is needed, and extend it eastward to Fife St. |
| 9. Larger blocks should not be required to subdivide beyond 600 x 600 feet |
| 10. Connectivity should be planned at the time of major redevelopment, not before |
| 11. Replace the proposed connectivity plan requirement with internal bike/ped network based on the Tier 3 bicycle/ped connections |
| 12. Sites with restricted access should be exempt |

| PEDESTRIAN ACCESS STANDARDS: |
| 1. Support for proposed pedestrian access standards |
| 2. Concern that pedestrian connections would reduce safety |
| 3. Frequency and size of connections too high and would divide up properties |
| 4. Threshold should remain 50% not 15%, tenant improvements should be exempt |
| 5. Clarify how standards work with topography, rounding |
| 6. Sites with restricted access should be exempt |

| RECOMMENDATIONS: |
| A. Clarify how proposal would apply to sites of varying size |
| B. Consider exemptions and exceptions for certain land uses, topography, other circumstances |
| C. Reduce requirements for alterations valued between 15 to 50% |
| D. Reduce size of proposed through-connections (e.g., 14 feet or two 7 foot sidewalks) |

| ENVIRONMENT: |
| 1. Support for stormwater strategy, green streets, and tree canopy actions |
| 2. Prioritize planting evergreen trees |
| 3. Put stronger emphasis on protecting the aquifer |
| 4. City implementation of the stormwater strategy should address maintenance, equity of costs |
| 5. Provide for maintenance of landscaping |
| 6. More emphasis on green building standards |

| RECOMMENDATIONS: |
| A. Highlight significance of protecting the aquifer |
| B. Reflect final decision on Madison District zoning |
| C. Call for citywide green building review |

| COMMUNITY VITALITY: |
| 1. Support for local serving services and amenities |
| 2. Crime is a big issue in the neighborhood |
| 3. Choosing a new name needs to reflect authentic community engagement |
| 4. Support for parks, open space actions, Madison School as a community hub |
| 5. Metro Parks Tacoma and Tacoma School District should implement the parks vision |
| 6. Clarify what it means to show a proposed park on a map |
| 7. Current proposal does not include enough/the right parks |

| RECOMMENDATIONS: |
| A. Call for authentic community engagement on neighborhood name |
| B. Clarify that parks principles and map are conceptual and aspirational |
| C. Call for further review on creating small scale open spaces with development |
| D. Engage with MPT and TSD to clarify |
8. A large park is not needed, do smaller green areas
9. Remove the park in the Mall District which is privately owned land
10. Specific comments regarding various proposed parks (e.g., dog park, skate park)
11. MPT agency comments – cannot commit to plan without separate action

**SHARED PROSPERITY:**
1. Support for City investment up front EIS and other catalytic actions
2. The economy of the area is fragile, changes in retail industry could be a concern
3. City should prioritize supporting business expansion, retention and recruitment
4. Prioritize recruiting businesses with a track record of good ethics and good wages
5. Diversify the types of businesses in the Mall
6. Consider actions to prioritize locally owned businesses versus national chains
7. Look for strategic and catalytic city actions to create business opportunities
8. Avoid an over-concentration of improvements in the Lincoln Heights (NE) and Mall (SE) Districts
9. Consider designating vacant/underutilized parcels in the NW District as catalyst sites
10. The Mall should have a movie theater, continuing walkability, events, art displays to turn it into a community resource
11. US Post Office is a major asset and should not be displaced

**STAFF RECOMMENDATIONS:**
A. Carefully review proposed connectivity and pedestrian access standards
B. Review proposed Development Regulation Agreement criteria
C. Consider revisions to Catalyst sites map in NW District, Post Office site
D. Integrate CAI report key findings

**UTILITIES AND SERVICES:**
1. Support for coordinated planning approach to support future growth
2. Add recycling to discussions of solid waste
3. Undergrounding of utilities is a priority

**RECOMMENDATIONS:**
A. Consult Solid Waste regarding recycling and food waste

**IMPLEMENTATION:**
1. Make sure that infrastructure is keeping pace with development
2. Development should pay for the cost of addressing impacts
3. Local Improvement Districts would be challenging for low income households
4. The City must follow through with implementation of non-contentious catalyst projects

**RECOMMENDATIONS:**
A. Develop an implementation tracking mechanism in the EIS
B. Highlight the importance of funding actions, including study of an impact fee approach
September 20, 2017

Planning Commission
747 Market Street, 3rd Floor
Tacoma, WA 98402

RE: Tacoma Mall Subarea Plan

Dear Chair Wamback,

The Transportation Commission has heard several presentations on the Tacoma Mall Subarea Plan including at a special subcommittee meeting on August 29 which focused on the issue of South 37th Street.

The Transportation Commission finds that the Tacoma Mall Subarea Plan is a great visioning plan. As a whole, it is consistent with the Transportation Master Plan (TMP) goals of developing partnerships, protecting natural assets, providing mobility for all, and reinforcing Tacoma’s land use vision. It is also consistent with the region’s Vision 2040 and the Growth Management Act. The Subarea Plan provides for networks for all forms of transportation while allowing for expected growth of the Regional Growth Center.

However, the Transportation Commission is divided on the issue of South 37th Street. The Commission agrees that major development should trigger new infrastructure, particularly for bicycling and walking. However, in order to allow greater flexibility in design, the Commission feels that rather than designate the addition of South 37th Street, the plan should require an east-west connection from Pine Street to South Tacoma Way between South 36th and South 38th Streets to create smaller urban blocks with improved bicycle & pedestrian infrastructure. This flexibility could result in the addition of a South 37th Street but might result in more innovative design such as curving roadways. The flexible design would be consistent with the policies of the Transportation Master Plan including providing alternate routes for auto traffic (Policy 3.18), smaller urban blocks to improve pedestrian accessibility (Policy 3.6) and a more complete network in the area (Policy 3.1).

The Transportation Master Plan addresses impact fees in Chapter 5, page 116-117. Impact fees are recognized as a promising potential future revenue option. However, more information is needed to determine the practicality of impact fees. The Transportation Master Plan recommends a feasibility study as a near term action. The Transportation Commission feels that the results of such a study must be reviewed before recommending use of impact fees.
To summarize, the Transportation Commission supports adoption of the Tacoma Mall Subarea Plan with the modifications discussed above.

Sincerely,

Justin D. Leighton  
Co-Chair  
Transportation Commission

Dr. Jane Moore  
Co-Chair  
Transportation Commission

cc: Mayor Marilyn Strickland  
Infrastructure, Planning & Sustainability Council Committee  
Tacoma City Manager  
Public Works Director  
Bicycle & Pedestrian Technical Advisory Group
September 19, 2017

Elliot Barnett, Planner  
City of Tacoma  
747 Market Street, Room 345  
Tacoma, WA 98402

RE: South Tacoma Ground Water Protection District Updates

Mr. Barnett,

The Tacoma-Pierce County Health Department is providing this letter of support for the proposed revisions to Tacoma Municipal Code Chapter 13.09 for the South Tacoma Ground Water Protection District (STGPD).

Health Department staff have been working closely with you and Environmental Services staff to review and develop these amendments over the past year. The Health Department is in full agreement with the intent of the proposed changes to TMC Chapter 13.09. Further, these revisions are consistent with our collective agencies’ recently updated approach to infiltration within the STGPD.

Thank you for facilitating this revision process and do let us know if there is anything more we can do to support the adoption of these changes.

Sincerely,

Andy Comstock, REHS, LG  
Program Manager

AC: sr

CC: Merita Trohimovich, City of Tacoma Environmental Services  
Jessica Knickerbocker, City of Tacoma Environmental Services

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