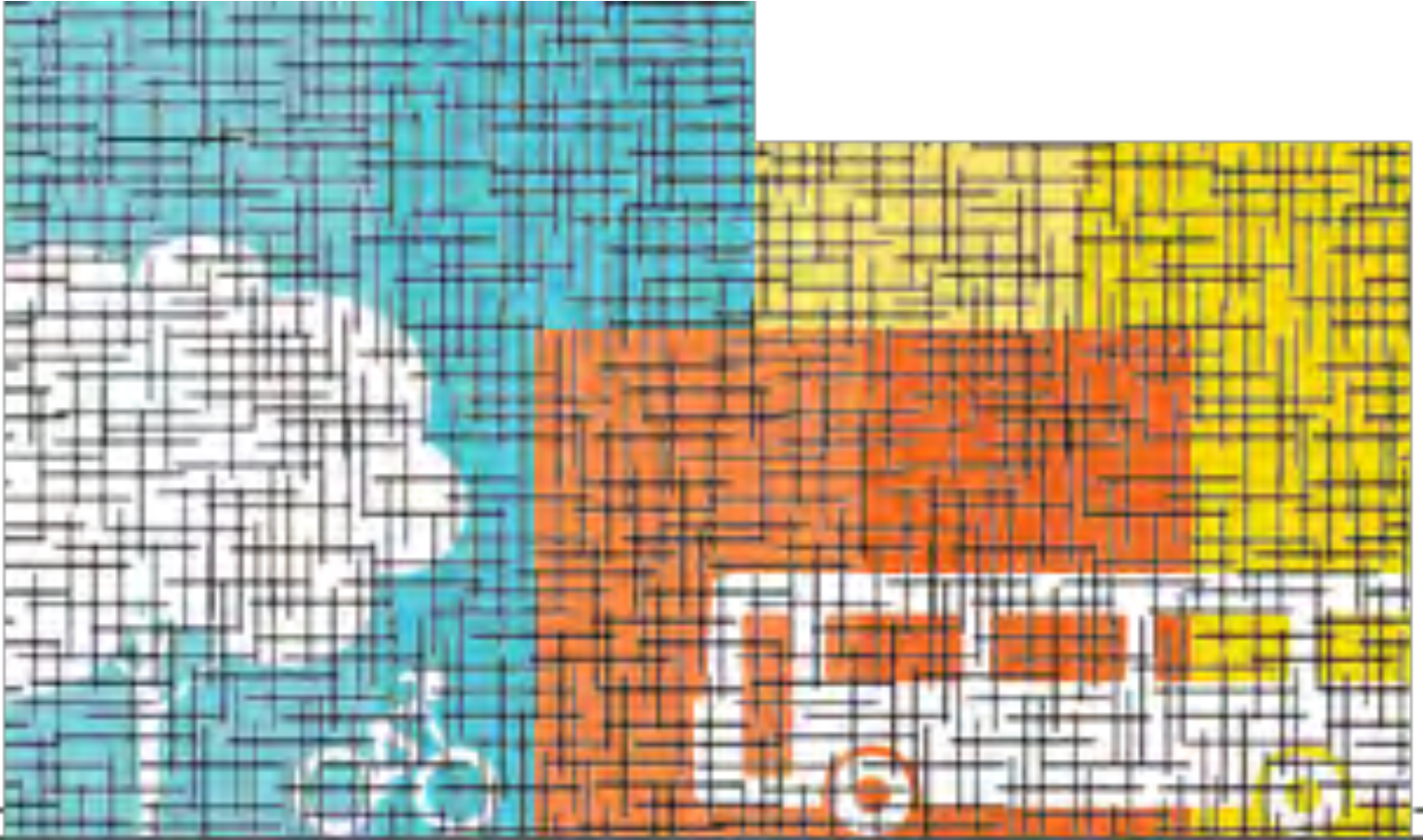


TACOMA MALL NEIGHBORHOOD

SUBAREA PLAN FINAL ENVIRONMENTAL IMPACT STATEMENT



11.03.17

CITY OF TACOMA
PLANNING AND DEVELOPMENT SERVICES DEPARTMENT



TACOMA MALL neighborhood



City of Tacoma
Planning and Development Services

November 3, 2017

Dear EIS Recipient:

After a three-year public planning process, the Tacoma City Council will soon take action on the proposed Tacoma Mall Neighborhood Subarea Plan. The proposals include adoption of the Subarea Plan as an element of the One Tacoma Comprehensive Plan, expansion of the Tacoma Mall Regional Growth Center by 116 acres, and a package of regulatory changes to implement key components of the community's vision. The finalization of the Tacoma Mall Neighborhood Subarea Plan represents a major milestone for this important neighborhood.

Along with the draft Subarea Plan, the City is issuing this Final Environmental Impact Statement (EIS). The EIS was prepared concurrently with the planning process, in accordance with the Washington State Environmental Policy Act (SEPA), and evaluates the environmental impacts of the Tacoma Mall Neighborhood Subarea Plan proposals, as well as the alternative of taking no action. The environmental review also evaluated the approval of the EIS as a document adequate for future SEPA compliance, decision-making and implementation of an upfront SEPA process authorized by RCW 43.21.C.420, including additional SEPA tools authorized by RCW 43.21C.021 (planned action) and RCW 43.21C.229 (infill exemption).

The City issued a Draft EIS along with the draft Tacoma Mall Neighborhood Subarea Plan on August 11, 2017. The Planning Commission has completed its review through a public process, including a public hearing on September 20, 2017, and forwarded its recommendation for adoption to the Council on October 18, 2017. The City is now issuing this Final EIS addressing comments received on the Draft EIS, and reflecting the changes made by the Planning Commission to the draft Subarea Plan.

This Final EIS concludes that the adoption of the Tacoma Mall Neighborhood Subarea Plan, and associated actions, as recommended by the Planning Commission, is the preferred alternative and hereby adopts the Final EIS as an upfront environmental approval under SEPA. For a non-project EIS completed under RCW 43.21C.420, the SEPA-based appeal opportunity occurs only in conjunction with this issuance of the non-project Final EIS.

Thank you for your interest in the Tacoma Mall Neighborhood. We look forward to implementing the forward-thinking actions included in the Tacoma Mall Neighborhood Subarea Plan.

Sincerely,



Peter Huffman, Director
City of Tacoma Planning and Development Services Department

FINAL ENVIRONMENTAL IMPACT STATEMENT

for the

TACOMA MALL NEIGHBORHOOD SUBAREA PLAN

This Final Environmental Impact Statement (Final EIS) for the Tacoma Mall Neighborhood Subarea Plan has been prepared in compliance with the State Environmental Policy Act (SEPA) of 1971 (Chapter 43.21C, Revised Code of Washington); the SEPA Rules, effective April 4, 1984, as amended (Chapter 197-11, Washington Administrative Code); and rules adopted by the City of Tacoma implementing SEPA (Tacoma Municipal Code, Chapter 13.12—Environmental Code). The City of Tacoma has determined that this EIS has been prepared in a responsible manner using appropriate methodology. As SEPA Lead Agency, the City has directed the areas of research and analysis that were undertaken in preparation of this EIS. This Final EIS will accompany the proposed Tacoma Mall Neighborhood Subarea Plan and will be considered in making final decisions concerning the Subarea Plan, as well as new policies and regulations, and site-specific projects proposed within the Tacoma Mall Neighborhood Subarea.

Date of Final EIS Issuance: November 3, 2017

Date of Draft EIS Issuance: August 11, 2017

Date of Draft EIS Public Meeting: August 30, 2017

Date Comments were due on the Draft EIS: September 15, 2017



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CITY OF TACOMA PLANNING AND DEVELOPMENT SERVICES DEPARTMENT

PREFACE

The purpose of this Final Environmental Impact Statement (Final EIS) is to:

- identify and evaluate probable adverse environmental impacts that could result from development associated with the Action Alternative and the No Action Alternative; and
- identify measures to mitigate those impacts.

This “Planned Action” EIS is an upfront environmental review of the Tacoma Mall Neighborhood Subarea Plan; expansion of the Tacoma Mall Regional Growth Center; and, implementing regulations for the Tacoma Mall Neighborhood. This document was prepared pursuant to the authorization and requirements of RCW 43.21C.420, .440, .229, regulations set forth in Chapter 197-11 WAC, and the requirements set forth in the Tacoma Municipal Code. Once complete, the EIS will allow the City Council to enact ordinances that use one or more or a hybrid of the upfront environmental review tools authorized by these statutory provisions, and to authorize or grant permits and approvals based upon certain “upfront” EIS provisions.

This Final EIS also builds upon previous regional planning efforts conducted by the Puget Sound Regional Council (PSRC) to meet the requirements of the State Growth Management Act (GMA), which requires regions, counties, cities and towns to plan for forecasted growth. The two major regional plans put forth by PSRC are VISION 2040 and Transportation 2040, both of which were backed by comprehensive EIS's. Pierce County establishes Countywide Planning Policies in conjunction with the cities and towns of the County and assigns population and employment growth allocations for the cities within its jurisdiction, including Tacoma, as mandated by the GMA. The development alternatives analyzed in this Final EIS have been designed in accordance with the two PSRC regional plans and the Pierce County growth allocations and, therefore, have already been analyzed and approved at the regional level. VISION 2040 is a regional strategy for accommodating the 5 million people expected to live in the central Puget Sound region by 2040. The Final EIS for VISION 2040 was issued in 2008, and in the preferred alternative, the largest shares of the region's future growth would occur in the region's five major metropolitan cities, including Tacoma.

Transportation 2040 is an action for regional transportation for the next 30 years and the Final EIS for the plan was issued in 2010. Land use assumptions were based on VISION 2040. Each EIS referenced in this paragraph is incorporated into this Final EIS by reference, as are the SEPA documents used for the Countywide Planning Policies and Population and Employment allocations.

The Final EIS for the Tacoma Mall Neighborhood Subarea Plan will accompany the Tacoma Mall Neighborhood Subarea Plan through the Council review and decision process and will be the principal environmental document considered in the decision-making for the Subarea

Plan, as well as new policies, regulations and proposals within the Tacoma Mall Neighborhood Subarea.

The environmental elements that are analyzed in this Final EIS were determined as a result of the formal, public EIS scoping process that occurred August through December 2015. The SEPA Determination of Significance/Scoping Notice was mailed to agencies and organizations and broadly distributed to residents, businesses and community stakeholders. Scoping Meetings were held on September 17, 2015 and October 22, 2015. During the EIS Scoping period, the City received written and oral comments regarding the scope of the Final EIS. At the conclusion of the Scoping process, the City confirmed the alternatives to be analyzed in this EIS and the range of environmental review to be evaluated, including: **land use, plans and policies, housing, aesthetics, cultural resources, transportation, public services, and, utilities and stormwater.**

The Table of Contents begins on pg. vii. In general, the Final EIS is organized into six sections:

- **Fact Sheet**—provides an overview of the proposed project, its location, approvals needed, contact information, and the Table of Contents;
 - **Chapter 1**—summarizes the Proposed Action and the alternatives, and includes a comparative matrix describing adverse environmental impacts, mitigation measures, and potential significant adverse environmental impacts associated with the alternatives;
 - **Chapter 2**—provides a detailed description of the Proposed Action and alternatives;
 - **Chapter 3**—is an analysis of current conditions and potential impacts of development that could result from the alternatives described in Chapter 2, as well as possible mitigation measures;
 - **Chapter 4**—Comments provided on the draft Subarea Plan and Draft EIS, and City responses; and,
- Appendices**—technical information utilized to support and inform the Final EIS. NAME OF PROPOSAL



FACT SHEET

Tacoma Mall Neighborhood Subarea Plan

PROPONENT

The proponent is the City of Tacoma

LOCATION

The area addressed by this EIS is the Tacoma Mall Neighborhood study area, an approximately a 601-acre area bounded by South Tacoma Way on the west and north, Interstate-5 on the east, and one block south of South 47th and 48th streets on the south.

PROPOSED ACTION

The proposed action consists of several related actions, including:

1. Adoption of a Tacoma Mall Neighborhood Subarea Plan, consistent with the City's Comprehensive Plan, Vision 2040 (the regional development plan) and the Washington State Growth Management Act (GMA).
2. A set of code changes referred to as Phase I amendments that would be adopted concurrent with the Subarea Plan to support its implementation. These include an area-wide rezone that would include new zoning boundaries, height limits and minimum density requirements; new large parcel standards; additional pedestrian street designations; and new design standards for tree cover, landscaping, parking lots, drive through facilities and other features.
3. Updates to the City's Comprehensive Plan Future Land Use Map to make the following related changes:
 - a. Expand the Mixed Use Center Tacoma Mall Regional Growth Center designation by 116 acres, consistent with the study area considered in this EIS.
 - b. Reduce the area of the South Tacoma Way Manufacturing and Industrial Center by 82 acres.
 - c. Reduce the area of the South Tacoma Way Neighborhood Center by 2 acres.
4. Approval of the EIS as a document that is adequate for future SEPA compliance, decision-making and implementation of an upfront SEPA process authorized by RCW 43.21C.420, and including additional SEPA tools authorized by RCW 43.21C.021 (planned action) and RCW 43.21C.229 (infill exemption).

EIS ALTERNATIVES

Alternatives considered in this DEIS include No Action— future growth would continue based on existing development regulations—and the Action Alternative—future growth assuming a new vision, subarea plan and updated development regulations for the study area, as briefly summarized below

- **Alternative 1:** *This alternative would retain existing zoning designations and associated development standards within the study area. Transportation improvements under the No Action Alternative would include the Tier 1 projects identified in the City’s Transportation Master Plan, projects which are largely within the City’s control. These include the South 38th Street extension, South 48th Street pedestrian overpass, and the Pine Street and Tacoma Mall Boulevard corridor improvements*
- **Alternative 2:** *Under Alternative 2, a new subarea plan would be adopted for the study area establishing a new vision for the area, updated development standards, transportation system, stormwater infrastructure, parks and open space improvements, and other public amenities. The Tacoma Mall Regional Growth Center would be expanded by 116 acres and a streamlined SEPA review process for development proposals that are consistent with the new subarea plan and analysis in this EIS would be adopted.*

LEAD AGENCY

City of Tacoma
Planning and Development Services Department

SEPA RESPONSIBLE OFFICIAL

Peter Huffman, Director

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

EIS CONTACT PERSON

Elliott Barnett, Associate Planner

City of Tacoma Planning and Development Services Department
747 Market Street, Room 345
Tacoma, WA, 98402
Telephone: (253) 591-5389
E-mail: elliott.barnett@cityoftacoma.org

FINAL ACTIONS

- *Adoption of the Tacoma Mall Neighborhood Subarea Plan;*
- *Adoption of an expanded RGC boundary of the Tacoma Mall Neighborhood Subarea Plan;*
- *Adoption of amended Comprehensive Plan land use designations, zoning classifications and other implementing development regulations; and*
- *Approval of the EIS as a document that is adequate for future SEPA compliance, decision-making and implementation of an upfront SEPA process authorized by RCW 43.21C.420, and*

including additional SEPA tools authorized by RCW 43.21C.021 (planned action) and RCW 43.21C.229 (infill exemption).

ENVIRONMENTAL REVIEW

If the action alternative is selected by the City, no additional SEPA review will be required for site specific development that is proposed within the Subarea if it (1) is consistent with the Tacoma Mall Neighborhood Subarea Plan and pertinent development regulations, and (2) vests within 10 years of issuance of the Final EIS. As established by RCW 43.21C.420, any proposed development that is consistent with adopted subarea plan policies and environmentally reviewed pursuant to RCW 43.21C.420, may not be challenged in administrative or judicial appeals as long as all requirements of this section have been satisfied.

After 10 years of issuance of the Final EIS, no additional SEPA review will be required for site specific development that is proposed within the Subarea if it (1) is consistent with the Tacoma Mall Neighborhood Subarea Plan, (2) is consistent with the “Planned Action” ordinance enacted by the City Council, (3) is not an essential public facility, and (4) vests within 30 years of the issuance of the Final EIS.

In addition, if the action alternative is selected by the City, no additional SEPA review will be required for site specific development that is proposed within the subarea if it is exempt under an “infill exemption” ordinance adopted by the City under RCW 43.21.229.

If the No Action Alternative is selected—or development deviates substantially from what is envisioned in this EIS—subsequent site- specific environmental review may be necessary; development regulation agreements pursuant to TMC 13.05.095 are by definition not to be considered as substantial deviations.

In addition, because the Subarea Plan will not be adopted, development would proceed without the benefit of the policy guidance in the Plan, which may increase the potential for adverse impacts of future development.

REQUIRED APPROVALS AND/OR PERMITS

The Final Actions section above identifies required City approvals for the proposal. In addition, permits or approvals would be needed in conjunction with future development activity.

Depending on the nature of development and the site, approvals including the following could be required:

STATE AGENCIES:

Department of Labor & Industries

- *Elevator Permits for subsequent development*

REGIONAL AGENCIES

Puget Sound Clean Air Agency

- *Asbestos surveys (associated with building renovation/ demolition)*
- *Demolition permits*

Tacoma-Pierce Co. Health Department

- *Underground storage tank decommissioning permit (site-specific, if applicable)*
- *South Tacoma Groundwater Protection District (i.e., hazardous material management and stormwater infiltration permits)*
- *Restaurant, food and drink permits*

CITY OF TACOMA

Planning and Development Services Department

- *Land Use permits (e.g., conditional use, variance, critical areas)*
- *Building permits*
- *Site Development permits (i.e., work order, grading, excavation and erosion control permits)*
- *Right of Way permits (i.e., street occupancy)*
- *Subdivision permits*
- *Mechanical permits*
- *Plumbing permits*
- *Concurrency authorization*
- *Certificate of occupancy*

Public Works Department

- *Street improvements (i.e., sidewalks, curbcuts, etc.)*

Environmental Services Department

- *Utility Connection permits*

Tax and License Department

- *Business licenses*

Tacoma Public Utilities

- *Electrical permits*
- *Utility extensions*
- *Water permits*

AUTHORS AND PRINCIPAL CONTRIBUTORS TO THIS EIS

This Tacoma Mall Neighborhood Subarea Plan EIS has been prepared under the direction of the City of Tacoma Planning and Development Services Department. Research and analysis associated with this EIS were provided by the following consulting firms:

- **3 Square Blocks LLC:** *lead EIS consultant; document preparation; environmental analysis—land use, relationship to plans and policies, housing, aesthetics, cultural resources (impacts and mitigation), public services*
- **ESA:** *utilities, cultural resources (existing conditions)*
- **Fehr & Peers:** *transportation*

LOCATION OF BACKGROUND DATA

City of Tacoma, Planning and Development Services Department
Attn: Elliott Barnett
747 Market Street, Room 345
Tacoma, WA 98402
Telephone: (253) 591-5389

DATE OF ISSUANCE OF DEIS:

August 11, 2017

DRAFT EIS COMMENT PERIOD:

August 11, 2017 to September 15, 2017

Agencies, affected tribes, and members of the public were invited to comment on the Draft EIS, including comments on the alternatives, probable significant adverse impacts, proposed mitigation measures, and licenses or other approvals that may be required.

DATE OF DEIS OPEN HOUSE AND PUBLIC HEARING:

August 30, 2017

Asia Pacific Cultural Center
4851 South Tacoma Way
Tacoma, WA 98409

The purpose of the open house and public hearing is to provide an opportunity for agencies, organizations and individuals to review information concerning the DEIS and to present oral comments on the DEIS—in addition to submittal of written comments.

AVAILABILITY OF THIS FINAL DEIS

Copies of this Final EIS, together with the Final Tacoma Mall Neighborhood Subarea Plan, will be distributed by CD to agencies, organizations and individuals noted on the Distribution List (Appendix A to this document).

The Final DEIS and Final Subarea Plan can be reviewed at the following locations:

- *City of Tacoma Planning and Development Services Department—747 Market Street, Room 345;*
- *All branches of the Tacoma Public Library (Main Branch, 1102 Tacoma Avenue S)*

A limited number of complimentary copies of the Final DEIS and Final Subarea Plan are available—while the supply lasts—either as a CD or hardcopy from the City of Tacoma Planning and Development Services Department, which is located at 747 Market Street, Room 345 in Tacoma.

Copies may also be purchased at the Planning and Development Services Department for the cost of reproduction. The Planning and Development Services Department is open 8 AM to 5 PM Monday through Friday.

This Final DEIS, Subarea Plan and appendices are also available online at: www.cityoftacoma.org/planning and www.tacomamallneighborhood.com.

SUMMARY

1.1 INTRODUCTION

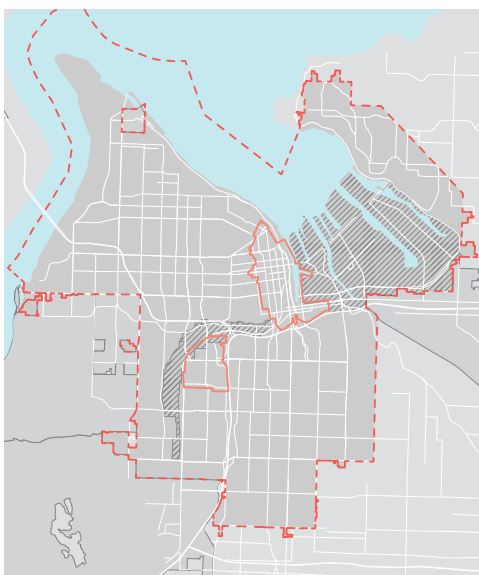
This Chapter summarizes elements of the proposed Tacoma Mall Neighborhood Subarea Plan (SAP) Draft Environmental Impact Statement (Draft EIS), including the purpose of the proposal and alternatives, a comparison of the impacts of the alternatives, and a summary of potential mitigation measures to reduce environmental impacts.

This Chapter is the first of a series of chapters contained in the Draft EIS that provide a summary and more in-depth environmental review of the proposal and alternatives:

- **Chapter 1 Summary:** Summary of proposal, impacts, and mitigation measures contained in Chapters 2 and 3.
- **Chapter 2 Alternatives:** Comprehensive description of the proposal and alternatives including proposed land use and zoning, transportation systems, parks and open space and stormwater management.
- **Chapter 3 Affected Environment, Significant Impacts, and Mitigation Measures:** Evaluates the current conditions and potential impacts of development that may result from the alternatives described in Chapter 2.
- **Appendices:** Technical information supporting the Draft EIS.

1.2 STUDY AREA

The Tacoma Mall Subarea is located approximately 2.5 miles southwest of downtown Tacoma, see sidebar. The study area is generally bounded by South Tacoma Way on the west and north, Interstate-5 on the east, and a block south of South 47th and 48th streets on the south. As shown in the sidebar, the Tacoma Mall Regional Growth Center (RGC), a designation established by the City of Tacoma and Puget Sound Regional Council, is located within the study area. The Tacoma Mall RGC is approximately 485 acres in size, and the portion of the study area



Regional Growth Centers
(Tacoma Mall and Downtown)

Part of Tacoma/South
Tacoma MIC

City of Tacoma

VISION 2040 & REGIONAL GROWTH CENTERS

VISION 2040 is the Puget Sound Regional Council's (PSRC) vision and strategy for accommodating the five million people and three million jobs that are expected to be present in the Puget Sound region by 2040, while promoting the "well-being of people and communities, economic vitality, and a healthy environment." The Tacoma Comprehensive Plan was developed to advance the overall direction established by VISION 2040. The proposed Draft Subarea Plan works to promote both Vision 2040 and the Tacoma Comprehensive Plan, at the neighborhood-level.

A key component of VISION 2040 is its regional growth strategy. It supports a pattern of urbanization that minimizes environmental impacts, supports economic prosperity, promotes adequate and affordable housing, improves mobility, and makes efficient use of existing infrastructure. The strategy is a guide for distributing forecast growth, and it looks to focus that growth primarily within urban centers in designated Urban Growth Areas. Urban Growth Areas are areas that are formally designated by counties, in consultation with their cities, to accommodate future development and growth, consistent with the requirements of the state Growth Management Act.

There are seven types of geographies in the regional growth strategy. Metropolitan Cities and Core Cities are the most intensely urban places in the region. Large Cities are the next tier of cities that have similar amounts of population and employment. Small Cities reflect the wide variety of smaller cities and towns throughout the region. Unincorporated Urban Growth Areas capture a wide variety of urban lands, both lightly and heavily developed. Rural Areas and Natural Resources Lands include different types of unincorporated areas outside of Urban Growth Areas, and include very low-density housing, working landscapes, and open space.

located outside of the RGC consists of approximately 116 acres, for a total study area of approximately 601 acres.

1.3 PROPOSED ACTION

The proposal by the City of Tacoma consists of the following related actions:

1. Adoption of a Tacoma Mall Neighborhood Subarea Plan, consistent with the City's Comprehensive Plan and Washington State Growth Management Act (GMA).
2. A set of code changes referred to as Phase I amendments that would be adopted concurrent with the Subarea Plan to support its implementation. These include an area-wide rezone that would include new zoning boundaries, height limits and minimum density requirements; new large parcel standards; additional pedestrian street designations; and new design standards for tree cover, landscaping, parking lots, drive through facilities and other features.
3. Updates to the City's Comprehensive Plan Future Land Use Map to make the following related changes:
 - a. Expand the Mixed Use Center Tacoma Mall Regional Growth Center designation by 116 acres, consistent with the study area considered in this EIS.
 - b. Reduce the area of the South Tacoma Way Manufacturing and Industrial Center by 82 acres.
 - c. Reduce the area of the South Tacoma Way Neighborhood Center by 2 acres.
4. Adoption of streamlined SEPA procedures for future project-level review in the Tacoma Mall Neighborhood Subarea Plan area consistent with the optional subarea plan procedures established in RCW 43.21c.420. As part of this Proposed Action, the City is also designating the Tacoma Mall Neighborhood Subarea Plan area as a planned action pursuant to RCW 43.21c.031 and identifying infill exemptions pursuant to RCW 43.21c.420.

1.4 OBJECTIVES OF THE PROPOSAL

The City has identified the following specific objectives of the proposal:

- Promote sustainable growth for a livable, transit-ready neighborhood, while strengthening the Tacoma Mall neighborhood role as a regional retail center.
- Provide for the transition from an auto-centric regional shopping area and adjacent residential areas to a compact complete neighborhood.

VISION 2040 & RGCs (CONTINUED)

The regional growth strategy focuses the majority of the region's employment and housing growth into Metropolitan and Core Cities, and particularly into designated Regional Growth Centers (RGCs) within those cities. Vision 2040 describes RGCs as follows: "Regional growth centers are areas of higher-intensity development and contain a mix of land uses and services. Major regional investment for transportation and other infrastructure should be prioritized for these locations." (PSRC)

Tacoma is one of five designated Metropolitan Cities in the region. As a Metropolitan City, Tacoma serves as a focal point for accommodating forecasted growth and helping to relieve development pressure on rural and natural resource lands. Tacoma has two designated RGCs. One is the Downtown RGC, the other is the Tacoma Mall RGC. The Tacoma Comprehensive Plan seeks to fulfill its role and responsibility as a Metropolitan City by planning for future population, housing and employment that align with VISION 2040 growth targets, including ambitious growth targets for the City's two RGCs.

The City has adopted subarea plans for the Downtown RGC to encourage and guide growth and development in a manner that supports the neighborhood's vision for its future character, services and quality of life. The proposed Draft Subarea Plan aims to do the same for the Tacoma Mall neighborhood, and was developed through a robust community engagement process.

- Enhance the function of the natural environment in the neighborhood, including improving stormwater management.
- Strengthen neighborhood identity and culture with 4 distinct character districts and more complete infrastructure.
- Improve mobility with a streets network that enables mode shift and increased separation of local and regional trips.
- Promote development consistent with Vision 2040, the Puget Sound Action Agenda, and Tacoma's Comprehensive Plan, Climate Action Plan and Tacoma 2025.
- Foster equity and empowerment for area residents and workers.
- Leverage public and private partnerships and investment to stimulate large-scale population and employment growth with the study area that
 - focuses new jobs and housing in areas with transportation choices
 - promotes equity and housing affordability
 - promotes salmon recovery and reduces stormwater impacts
 - contributes to a healthy economy
 - accelerates regional conservation as a Transfer of Development Rights (TDR) receiving area
 - contributes to a unique, vibrant and attractive urban center
- Identify infrastructure improvements to support a healthy environment, support sustainability, and ensure a long-term high quality of life for all residents.

1.5 ENVIRONMENTAL REVIEW

The purpose of this EIS is to assist the public and decision-makers in considering the potential environmental effects of the proposed Subarea Plan and implementing regulations.

SEPA requires government officials to consider the environmental consequences of future actions and to consider ways to accomplish the objectives that minimize adverse impacts or enhance environmental quality. They must consider whether the proposed action will have a probable significant adverse environmental impact on the elements of the natural and built environment.

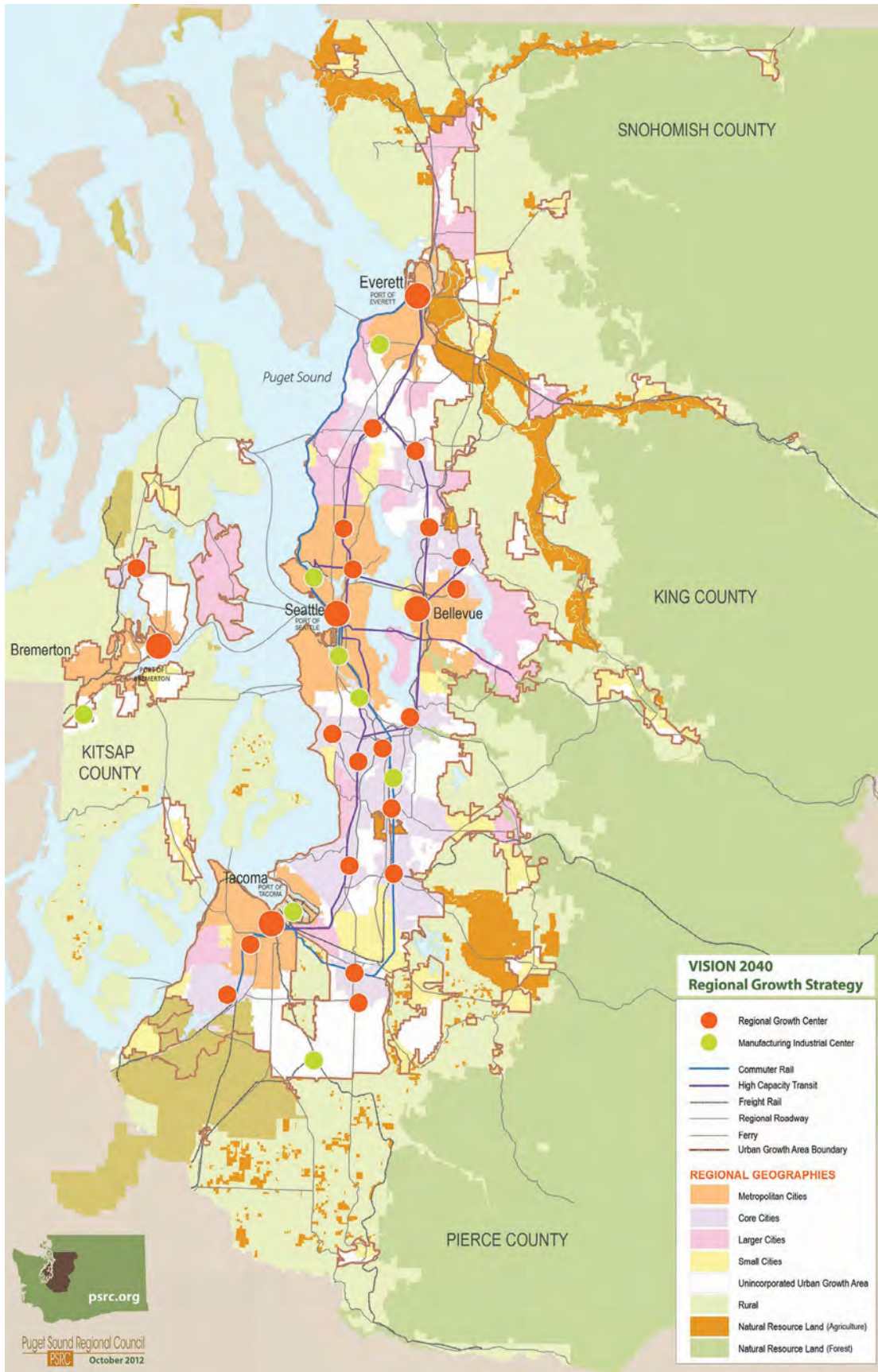


Figure 1.1. Vision 2040 Regional Growth Strategy map.

The adoption of a subarea plan and implementing regulations is classified by SEPA as a non-project (also referred to as programmatic) action. A non-project action is defined as an action that is broader than a single site-specific project and involves decisions on policies, plans or programs. An EIS for non-project proposal does not require site-specific analysis; instead the EIS will discuss impacts and alternatives appropriate to the scope of the non-project proposal and to the level of planning for the proposal.

The analysis in the EIS will be used in the future to help inform project-level development proposals. For this EIS, the City has elected to follow the non-project process established under RCW 43.21C.420 (optional subarea plan). Recognizing that RCW 43.21C.420 includes a sunset provision, the City is also proceeding under RCW 43.21C.031 (planned action) and RCW 43.21C.229 (infill exemption), providing the City with additional SEPA tools that may be used if the provisions in RCW 43.21C.420 expire before the City's vision for the Tacoma Mall neighborhood is achieved. Each of these SEPA processes is described in detail in Chapter 2.

1.6 PUBLIC ENGAGEMENT

The City's public engagement effort is intended to engage with the broad and diverse range of interested parties including area residents, businesses and property owners, community organizations, public entities and agencies, visitors, potential developers or investors, and the broader planning and scientific communities. The City is providing multiple ways in which stakeholders can participate, including online, social media, public workshops and meetings, stakeholder interviews, and focus groups. Notification of meetings and other opportunities for community engagement is provided through neighborhood-wide mailings, email and webpage updates, and sign postings consistent with requirements of RCW 43.21C.420. A summary of the City's public engagement activities to-date is provided in Chapter 2 and additional information can be found at the City's project website: [http:// www.tacomamallneighborhood.com/](http://www.tacomamallneighborhood.com/).

1.7 ALTERNATIVES

As described to a greater degree in Chapter 2, alternatives addressed in this Draft EIS include Alternative 1, No Action— future growth would continue based on existing

development regulations s—and Alternative 2, the Action Alternative—future growth assuming a new vision for the area, updated development standards, transportation system, stormwater infrastructure and other public improvements, and public/private investment. Each alternative is briefly described below and key features of the alternatives summarized in Table 1-1.

Table 1.1. Alternatives Overview

Features	Alternative 1 No Action	Alternative 2 Action Alternatives
New Housing Units	4,040 new housing units by 2040	4,444 new housing units by 2040
Additional Population	8,079 additional persons by 2040	8,887 additional persons by 2040
New Jobs	7,555 new jobs by 2040	8,385 new jobs by 2040
New Commercial Square Footage	2,833,125 sf by 2040	3,144,375 sf by 2040
RGC Area	No change proposed to RGC area	The existing RGC would be expanded by approximately 116 acres to include area located along the north and west boundaries (Figure 2.2).
Land Use and Zoning	Existing land use and zoning designations would remain unchanged	Alternative 2 includes an updated land use vision, land use designations, zoning classifications, and development standards, including a set of code changes that would be adopted concurrent with the Subarea Plan, identified as Phase 1 amendments. Major elements of the Phase 1 amendments include an area-wide rezone that would include new zoning boundaries, height limits and minimum density requirements; new large parcel standards (including new review process and street connectivity requirements); additional pedestrian street designations; and new design standards for tree cover, landscaping, parking lots, drive through facilities and other features. A future code amendment package, identified as Phase 2 code amendments, may include a hybrid traditional/form-based code, measure to support a more modern Northwest design aesthetics, and new standards for supporting district identifies.
Transportation Network	Future improvements would continue to occur on an incremental basis as planned by the City's Transportation Master Plan. The No Action Alternative includes the Tier 1 projects identified in the City's Transportation Master Plan, projects which are largely within the City's control. These include the S 38th Street extension, S 48th Street pedestrian overpass, and the Pine Street and Tacoma Mall corridor improvements.	In addition to the Tier 1 projects identified in the City's Transportation Master Plan, the Alternative 2 street network would be enhanced to increase connectivity, provide greater bicycle and pedestrian mobility, improve access to transit, and improve vehicle traffic flow. The proposal includes 25 new near-, mid- and long-term transportation projects that are proposed for incorporation into the City's Transportation Master Plan. The projects reflect Subarea Plan policy priorities such as constructing the Loop Road, improved network connectivity, greening streets as part of the area-wide stormwater strategy, locating a high capacity transit station in the subarea, and improving the multi-modal system.
Stormwater Infrastructure	Stormwater improvements as required by City regulations	Alternative 2 proposes low impact development (LID) stormwater improvements, including increased green space, permeable pavement, bioretention facilities, a regional treatment facility, and amended development standards to promote sustainable stormwater management.
Parks and Open Space	No plan for new or improved parks or open space	Alternative 2 proposes an illustrative concept plan for new parks and open spaces. The plan supports a coordinated partnership with Metro Parks Tacoma, the City of Tacoma, the Tacoma School District and civic partners to achieve the subarea plan parks vision and recognizes that integration of the vision into the context of citywide system planning efforts is a first step toward future parks actions.

ALTERNATIVE 1

FUTURE GROWTH AND DEVELOPMENT PATTERNS

Alternative 1 would continue the current Comprehensive Plan land use designations and zoning classifications. Future growth would occur according to existing land use designations, zoning designations (see Figure 1-1) and development standards.

As shown in Table 1-1, Alternative 1 assumes significant growth in both housing and employment through 2040 within the existing 485-acre Regional Growth Center. However, based on historic development trends in this area, there is high likelihood that future development would be limited and would not achieve the City's vision for this area.

Private investment in businesses and housing would likely occur in a scattered and incremental fashion and carry forward the existing auto-centric design, with large paved areas and limited amenities, including pedestrian improvements and parks and open space facilities.

TRANSPORTATION, PARKS, STORMWATER MANAGEMENT

Improvements to the street network, open space and park facilities and stormwater infrastructure would be based on the City's adopted Capital Improvement Plan and other implementing plans and regulations. It is anticipated that the majority of future public improvements would be developed on a limited and incremental basis as development occurs.

SEPA REVIEW

Streamlined SEPA review would not be implemented and each proposed development would be subject to individual environmental review.

ALTERNATIVE 2

FUTURE GROWTH AND DEVELOPMENT PATTERNS

Under Alternative 2, the RGC would be expanded to include approximately 116 acres focused along the west and north boundary of the study area (see sidebar on p. 1-1). This addition recognizes existing land use patterns, transportation improvements and topographic features in this area. A portion of this proposed expansion area overlaps with other designated centers in the City.

Consequently, the proposed expansion would result in small reductions to the South Tacoma Way Manufacturing and Industrial Center and the South Tacoma Way Neighborhood Center.

Overall, Alternative 2 proposes redevelopment of the study area into an area characterized by a cohesive urban form, a complete street system with pedestrian and bicycle connectivity and improved transit access, and green stormwater infrastructure integrated with new parks and open spaces.

Compared to Alternative 1, a slightly higher level of residential and employment growth is anticipated, (see Table 1-1) due to the expanded RGC. Growth would be distributed throughout the expanded RGC according to revised land use designations and zoning classifications as shown in Figure 1-2 and briefly described in Table 1-1.

TRANSPORTATION, PARKS, STORMWATER MANAGEMENT

A summary of the transportation, parks and stormwater management improvements proposed under Alternative 2 is provided in Table 1-1 and briefly highlighted below.

Transportation. The Alternative 2 proposed transportation system would build from the City's adopted Transportation Master Plan and Complete Streets design guidelines, tailored to add specific improvements to support the vision for the Tacoma Mall neighborhood and to provide equity in transportation facilities to serve the neighborhood. The proposal plans for transportation improvements that would be provided at a rate equal or ahead of the pace of development during the planning horizon. The proposal retains City authority to conduct transportation impact assessments on large-scale development proposals.

Parks. Alternative 2 proposes an illustrative concept plan for an integrated system of parks, open space, green infrastructure and public streets including the Loop Road. The plan supports a coordinated partnership with Metro Parks Tacoma, the City of Tacoma, the Tacoma School District and civic partners to achieve the vision.

Stormwater Management. Alternative 2 would seek to enhance water quality and water quantity conditions through implementation of an areawide stormwater strategy and Best Management Practices (BMPs) that infiltrate

runoff, provide flood storage, and reduce effective impervious surface coverage.

SEPA REVIEW

Exemption from the SEPA review process for development proposals that are within the scope of the new Subarea Plan and analysis in this EIS would provide greater efficiency and certainty for new development and increased potential to achieve the vision for compact complete Tacoma Mall community.

1.8 MAJOR ISSUES, SIGNIFICANT AREAS OF CONTROVERSY AND UNCERTAINTY, AND ISSUES TO BE RESOLVED

The major issues under review in this EIS include:

- Future neighborhood urban form and character as expressed through the community vision, proposed land use designations, zoning classifications and development regulations;
- Potential expansion of the existing Tacoma Mall Regional Growth Center;
- Planned transportation network improvements, including connectivity, multimodal circulation, and use of sustainable measures and green infrastructure;
- A proposed conceptual integrated system of parks, open space, green infrastructure and public streets.
- Proposed enhancements to water quality and quantity conditions through an area-wide stormwater strategy.

Issues to be resolved include:

- Determination of the preferred community vision and related implementation measures;

1.9 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

This section contains an abbreviated version of Chapter 3, which contains the full text of the Affected Environment, Significant Impacts, and Mitigation Measures sections. For more information, readers are encouraged to review the more comprehensive discussion of issues in Chapter 3 in order to gain a more complete understanding of impacts associated with the alternatives.

Table 1.2. Impacts of the Alternatives

Element of the Environment	Impacts Common to Both Alternatives	Impacts of Alternative 1 No Action	Impacts of Alternative 2 Action Alternative
Land Use			
Land Use	<p>Under both alternatives zoning regulations would provide sufficient development capacity to meet the 2040 growth targets and to allow for intensive land use and building patterns that would support City and regional planning goals for regional centers.</p> <p>New growth and development would occur in the study area, resulting in greater mixes of uses and building intensities than under existing conditions. These types of impacts have the potential to cause corresponding land use compatibility impacts. Specific impacts to the existing land use pattern vary between alternatives.</p>	<p>Past and current development trends in the RGC are for much lower intensities than allowed under current zoning. The gap between allowed land use patterns and development trends creates uncertainty about the intensity of future development patterns, and the likelihood that development under the No Action would achieve the 2040 growth targets.</p> <p>Under existing zoning regulations, infill and redevelopment could result in a greater mix of uses and intensities than currently exist. The Northwest District and the residential neighborhoods in the Lincoln Heights District and the Madison District could see the greatest increase in mix of uses. Areas zoned UCX, which make up the majority of the RGC, could see the greatest increase in land use intensities.</p> <p>The City's existing zoning regulations and development standards include provisions to mitigate for conflicts between land uses. Additionally, there is little potential for land use conflicts in areas adjacent to the RCC.</p>	<p>The proposed land use plan and zoning designations would create a greater level of certainty about future land use patterns compared to the No Action. Alternative 2 also assumes major improvements to multimodal transportation, stormwater and parks and open space systems. These improvements could incentivize development and help to achieve the 2040 growth targets.</p> <p>Under proposed zoning regulations, the highest intensity development in the study area would occur around the Tacoma Mall and portions of South 38th Street, and portions of South Pine Street and South Tacoma Way and Tacoma Mall Boulevard. Moderate to low intensity development would occur in the Madison residential neighborhood. Moderate to high intensity development would occur throughout the remainder of the study area. Permitted building intensities throughout the study area would be similar to those under the No Action alternative.</p> <p>The proposed expansion of the study area by 116 acres would distribute development demand for the Tacoma Mall neighborhood over a larger area. To mitigate for potential lower overall development intensity, Alternative 2 includes zoning and other provisions to create a dense urban core appropriate for a regional urban center.</p> <p>The potential future mix of land uses would change compared to the No Action. Zoning in the proposed expansion area would change from light industrial to allow for a mix of uses. Proposed zoning designations in the Lincoln Heights and Madison districts would help create stable long-term residential areas. Proposed zoning designations adjacent to Interstate-5 would preserve the existing commercial character of this area.</p> <p>The proposed zoning designations are designed to produce future development patterns that minimize incompatibilities between land uses through transitioning and buffering. Additionally, the City's existing development regulations would help to mitigate for conflicts between land uses, and there is little potential for land use conflicts in areas adjacent to the study area.</p> <p>The proposed expansion area includes 82 acres of the South Tacoma Manufacturing/Industrial Center (MIC). Rezoning this area would not significantly impact the MIC's ability to meet 2040 growth targets. Also, zoning designations in parts of the proposed expansion area would allow for a range of light industrial uses.</p>

Element of the Environment	Impacts Common to Both Alternatives	Impacts of Alternative 1 No Action	Impacts of Alternative 2 Action Alternative
Plans and Policies	<p>Both alternatives are consistent with adopted plans and policies reviewed in this EIS. Both alternatives plan for growth according to adopted local and regional targets and plan for land use, transportation, parks/open space and stormwater management according to state, regional and local guidance.</p>	<p>Impacts would be as described under Impacts Common to Both Alternatives.</p>	<p>Under Alternative 2, the RGC may be expanded. If the City elects to expand the RGC, this action would not be consistent with Tacoma Comprehensive Plan Policy UF-2.4, which states that centers should be expanded only if the center has maximized its development potential. An amendment to Policy UF-2.4 to recognize the topographic, land use, and transportation features that are the basis for the proposed expansion could address this inconsistency.</p>
Housing	<p>Both alternatives would provide sufficient development capacity to achieve the 2040 housing growth targets. Under both alternatives, if growth targets were met the existing jobs to housing balance would shift from heavily weighted towards jobs to somewhat more balanced between jobs and housing.</p> <p>Zoning regulations under both alternatives allow for a variety of housing types ranging from single family to multifamily to group housing.</p> <p>Housing costs may rise under both alternatives as growth occurs. It is possible that some residents may be displaced or choose to move elsewhere. At the same time, new housing development would increase the overall housing inventory, which could help limit upward pressure on housing costs. The City's current affordable housing development incentives could also help to ensure an adequate inventory of affordable housing.</p>	<p>Current residential development trends in the RGC are for lower intensities than allowed under current zoning. The gap between allowed and existing intensities creates uncertainty about the nature of future development. Future development trends will depend on a variety of factors, many of which are not predictable, however it is possible that future residential development activity would not meet the City's 2040 growth target for the RGC.</p> <p>Existing zoning regulations allow for mixed uses throughout the RGC, with no areas zoned exclusively for residential uses. Under this zoning, the residential neighborhoods in the Lincoln Heights District and the Madison District could become increasingly mixed with non-residential uses over time, reducing housing options for people who prefer to live in single use neighborhoods.</p>	<p>Alternative 2 has features that could incentivize development and increase the likelihood of meeting the 2040 housing growth targets for the study area, including proposed new zoning and design standards and infrastructure improvements.</p> <p>Proposed zoning regulations would help protect the study area's two established residential neighborhoods in the Madison and Lincoln Heights Districts, designating them for residential uses. Additionally, a mix of residential uses would be allowed in the proposed expansion area.</p> <p>Alternative 2 includes additional policy guidance to mitigate for potential affordability impacts in the study area. The impacts of these policies will depend upon how they are implemented, but could have a positive impact on affordability. Additionally, the transportation improvements proposed in the Subarea Plan could help to reduce the cost burden of living in the study area.</p> <p>Alternative 2 also strengthens policy support for proactive steps to prevent involuntary displacement and increases the affordability target to 50% of units affordable at 80% of Area Median Income and 25% affordable at 50% of Area Median Median Income.</p>
Aesthetics and Urban Design	<p>Under both alternatives the character of the study area is anticipated to become increasingly urban over time, with a greater intensity and mix of land uses. With new development, there would be a corresponding increase in the average height, bulk and scale of buildings. These changes in urban form could result in impacts to shade, views and light and glare in the study area under both alternatives.</p> <p>The study area does not contain any designated view corridors or view overlays. New sources of light and glare would be similar to those that currently exist in the study area, and the City's lighting standards would help to mitigate for light and glare impacts.</p>	<p>The urban form in the study area has the potential to become increasingly mixed and intensely developed under existing regulations.</p> <p>Alternative 1 allows the greatest building heights and mass and, as such, has the greatest potential for increases in building bulk and scale. While this potential exists, past and current real estate market trends in the study area have been primarily for low- and mid-rise development. This creates uncertainty about the intensity of future urban patterns.</p>	<p>Alternative 2 aims to create a cohesive urban form for the study area that supports a vibrant, attractive and pedestrian-friendly living environment.</p> <p>Under Alternative 2, the proposed future land use plan and zoning intensities are intended to create an urban core for the neighborhood by focusing highest intensity uses along portions of South 38th Street, South Pine Street and the Tacoma Mall Boulevard, and by downzoning non-core areas for moderate to high and low to moderate intensities. Alternative 2 has features that could incentivize development and help to achieve this urban pattern.</p>

Element of the Environment	Impacts Common to Both Alternatives	Impacts of Alternative 1 No Action	Impacts of Alternative 2 Action Alternative
		<p>The City's upper floor setback requirements for development on designated pedestrian streets would help to reduce shading impacts on South Steele Street, South 47th/48th Street and a small portion of South Tacoma Way in the southwest corner of the neighborhood. In other areas, new development could increase shade and shadow on streetscapes and other public spaces, making them less friendly and inviting to the public.</p> <p>No major improvements to the streetscape and public realm are planned under Alternative 1. Project-by-project improvements would occur consistent with current development standards.</p>	<p>Alternative 2 would designate additional pedestrian streets in the study area. Combined with the City's existing upper floor setback requirements for development on designated pedestrian streets, this would reduce potential future shading impacts on a larger area of the public realm compared to the No Action.</p> <p>Extensive improvements to the streetscape and public realm are planned under Alternative 2. This includes increasing the density of the street grid, stronger design standards, and new public infrastructure improvements.</p>
Cultural Resources	<p>There are no known historic or cultural resources in the study area. However, there are buildings that may qualify as historic properties and a moderate to high potential for cultural resources in the study area under either alternative. Possible impacts to historic resources, if identified, could result from include demolition, inappropriate rehabilitation or changes in physical context. Possible impacts to cultural resources, if identified, could result as a consequence of ground disturbance.</p>	<p>Impacts would be as described under Impacts Common to Both Alternatives.</p>	<p>Impacts would be as described under Impacts Common to Both Alternatives.</p>
<i>Transportation</i>			
<i>Intersection LOS</i>	<p>Impacts differ among alternatives.</p>	<p>Although the SOV mode share is projected to drop by 15 percentage points compared to existing conditions, traffic volumes will increase due to growth within the Subarea and throughout the region. Four intersections are projected to operate at LOS F, which is defined as a deficiency.</p>	<p>The SOV mode share is expected to drop by 5 percentage points compared to the No Action Alternative. One intersection is projected to be impacted: S Lawrence Street/S Tacoma Way. It is recommended that the City monitor operations at this intersection and consider access restrictions if long delays materialize (for example, the S Lawrence St could be restricted to right in-right out operations). The mitigation measures are expected to reduce the impact to a less than significant level</p>
<i>Roadway LOS</i>	<p>97 percent of arterial land miles are expected to meet the City's volume-to-capacity threshold under both alternatives, so no impact is identified.</p>	<p>Traffic volumes will increase compared to existing conditions due to growth within the Subarea and throughout the region. 97 percent of arterial lane miles are expected to meet the City's volume-to-capacity threshold so no deficiency is identified.</p>	<p>Similar to the No Action Alternative, 97 percent of arterial lane miles are expected to meet the City's volume-to-capacity threshold so no impact is identified.</p>
<i>Pedestrian System</i>	<p>Impacts differ between alternatives.</p>	<p>Pedestrian trips will increase compared to existing conditions. There are no committed City projects to address the lack of pedestrian facilities in the study area under this alternative so a pedestrian system deficiency is identified.</p>	<p>The improvements to the pedestrian network proposed under Alternative 2 are expected to accommodate the associated growth in pedestrian trips. Therefore, no impact to the pedestrian system is identified.</p>

Element of the Environment	Impacts Common to Both Alternatives	Impacts of Alternative 1 No Action	Impacts of Alternative 2 Action Alternative
<i>Bicycle System</i>	Impacts differ between alternatives.	Bicycle trips will increase compared to existing conditions. The TMP identifies bicycle improvements to provide access to the subarea, but there is no provision for a bicycle network <i>within</i> the subarea. Based on the lack of internal bicycle infrastructure, a bicycle system deficiency is identified.	The improvements to the bicycle network proposed under Alternative 2 are expected to accommodate the associated growth in bicycle trips. Therefore, no impact to the bicycle system is identified.
Safety	Collision rates are not expected to increase under either alternative, so no impacts to safety are identified.	Vehicle trips would increase due to expected growth within the Tacoma Mall subarea and beyond. Although the total number of collisions is expected to increase compared to existing conditions, there is no indication that collision rates would increase and therefore, no deficiency is identified.	The infrastructure projects proposed under Alternative 2 would result in improved access management and fewer uncontrolled left turns, which is expected to decrease collision rates compared to Alternative 1. Speeds may decrease as the grid network roadways will tend to have fewer lanes and visual narrowing effects as a result of landscaping and other treatments. Lower speeds would reduce the severity of crashes. Therefore, no impact to safety is identified.
<i>Parking</i>	Increased demand for parking could result in demand spilling over into adjacent neighborhoods under either alternative. If the City manages parking demand, as proposed in the Subarea Plan, no impacts to parking are projected.	Parking demand will increase as growth occurs in the subarea. It is expected that developers will construct off-street parking aligning with market demand and that the City, which only controls the on-street supply, would manage parking through time limits and pricing to achieve its target 85 percent occupancy. Therefore, no deficiency is identified.	Alternative 2 includes the addition of new streets, some of which would provide on-street parking. This new supply is likely to outweigh any loss in parking caused by modifications to existing roadway cross-sections. As with Alternative 1, it is expected that developers will construct off-street parking aligning with market demand and the City would manage parking through time limits and pricing to achieve its target 85 percent occupancy. Therefore, no parking impact is identified.
Public Services			
<i>Fire and Emergency Services</i>	<p>Under both alternatives significant housing and jobs growth is expected to occur, average building heights are expected to increase in various amounts and locations in the study area, and construction and redevelopment are expected to occur. These factors are anticipated to generate incremental new demands for fire and EMS services within the study area as growth occurs over time.</p> <p>Based on the City's adopted levels-of-service and the 2040 growth targets, under both alternatives there would be a need for one additional staffed fire engine. Additionally, given the level of density proposed under both alternatives, a new fire station in the study area may be needed. Development of additional data would assist the Tacoma Fire Department in understanding this potential need.</p>	No impacts other than those described under Impacts Common to All Alternatives.	Alternative 2 includes policy guidance intended to strengthen provision of public services in the Tacoma Mall Neighborhood, including fire and emergency medical services. If successfully implemented, this is expected to have positive impacts.

Element of the Environment	Impacts Common to Both Alternatives	Impacts of Alternative 1 No Action	Impacts of Alternative 2 Action Alternative
	<p>The Tacoma Fire Department would address future service needs through ongoing capital improvement, planning and budgeting efforts. Currently the City has no funding in place to implement the Department's Facilities Master Plan. Identifying funding sources to implement planned capital improvements in the study area is recommended.</p>		
<i>Police</i>	<p>Incremental increases in demand for police services are anticipated with the population growth, increased building heights and increased construction activity proposed under both alternatives.</p> <p>Crime rates in the study area are currently higher than the Police Department's targets and crime is a concern in the community. Future development under both alternatives could potentially have a positive impact on crime, by reducing the number of vacant or underutilized parcels and by increasing the number of people in public places.</p> <p>Based on the City's adopted levels-of-service and the 2040 growth targets, under both alternatives there would be a need for another 2,300 to 2,600 square feet of police facility space. In the short term, the Tacoma Police Department does not anticipate a need for new police facility space.</p> <p>The Department would address future service needs through ongoing capital improvement, planning and budgeting efforts. Additionally, establishing emergency access agreements and procedures with building managers could help to mitigate for new service needs related to multistory buildings.</p>	<p>No impacts other than those described under Impacts Common to All Alternatives.</p>	<p>Alternative 2 includes policy guidance intended to strengthen provision of public services in the Tacoma Mall Neighborhood, including police services. If successfully implemented, this is expected to have positive impacts.</p>
<i>Schools</i>	<p>Under both alternatives significant housing growth is expected to occur. As new housing units are developed over time, an increase in the population of public school students in the study area is anticipated.</p> <p>Growth in the study area would likely result in incremental increases in the public school student population and associated incremental impacts on public schools. This would allow the District to respond through ongoing capacity management planning. The District and the City regularly share information to help ensure adequate school services are provided.</p>	<p>No impacts other than those described under Impacts Common to All Alternatives.</p>	<p>Alternative 2 includes policy guidance to increase coordination between the City and the Tacoma School District and to consider opportunities for enhancing school services and other public services and amenities in the study area through redeveloping the existing Madison School site in or adding a new school. If successfully implemented, this policy guidance is anticipated to have positive impacts.</p>

Element of the Environment	Impacts Common to Both Alternatives	Impacts of Alternative 1 No Action	Impacts of Alternative 2 Action Alternative
	<p>The District does not anticipate a need to make school facility improvements in the study area prior to 2021 and is in the process of evaluating longer-term facility needs. In the event of a shortfall in student capacity at the schools serving the study area, the District could address this in several ways such as adjusting school boundaries, adding or removing portables, remodeling existing schools and constructing new schools.</p>		
<p><i>Public Parks and Open Space and Recreation</i></p>	<p>Growth in residential and worker populations in the study area proposed under both alternatives is expected to result in increased use of existing parks and open space facilities in the study area, and corresponding increases in operations and maintenance needs.</p> <p>Based on the City's and Metro Parks Tacoma's currently adopted levels-of-service, there is an existing identified need to address a small parks service gap in the southeast corner of the study area. As population grows in the study area, this gap will affect a greater number of people. The current levels-of-service may be updated in the future as a result of ongoing planning between the City, Metro Parks Tacoma, other parks partners and the community.</p> <p>Growth is anticipated to occur incrementally under both alternatives. This would allow the City of Tacoma and Metro Parks Tacoma to respond to corresponding increases in need through ongoing parks and open space resource management planning.</p>	<p>No impacts other than those described under Impacts Common to All Alternatives.</p>	<p>Alternative 2 includes policy guidance for the City to collaborate with Metro Parks Tacoma and other parks partners to establish a shared definition of levels-of-service for urban parks, a shared understanding of how best to serve the parks and open space needs of Tacoma's densest urban centers, and to develop plans, implementation, funding and maintenance strategies for a network of parks and open spaces in the study area. Alternative 2 includes proposed levels-of-service, parks planning principles, and an illustrative concept plan for a significantly expanded parks system in the study area as a starting point for discussion between the City and parks partners. If successfully implemented, this policy guidance is anticipated to have positive impacts.</p>
<p><i>Utilities</i></p>			
<p><i>Water System</i></p>	<p>Both alternatives will increase the demand for water, and higher growth will correspond to higher demands on the water supply. However, the capacity of the existing utility in the study area exceeds demand and it is anticipated that adopted LOS standards for water flow and pressure would be met with existing water supplies.</p> <p>While some localized conveyance capacity upgrades could be required to supply new development, no major new projects or initiatives are anticipated to be necessary for projected growth within the subarea. Localized improvements to water distribution mains necessary to support specific development projects would be funded and completed by the developer consistent with City of Tacoma concurrency standards.</p>	<p>No impacts other than those described under Impacts Common to All Alternatives.</p>	<p>Alternative 2 includes policy guidance to support provision of public services in the study area, consistent with current City practices. Successful implementation of this policy guidance is anticipated to have positive impacts on water service.</p>

Element of the Environment	Impacts Common to Both Alternatives	Impacts of Alternative 1 No Action	Impacts of Alternative 2 Action Alternative
<i>Wastewater</i>	<p>Neither alternative is expected to result in significant capacity implications for existing wastewater conveyance systems or result in temporary or permanent reduction in LOS for residents or businesses within the study area. While there would be increased demand on the wastewater system under either alternative, City of Tacoma Environmental Services Department (Wastewater) follows City policy to address system capacity issues and to incorporate improvements and repairs in association with City infrastructure projects and other major development activities.</p> <p>Consistent with concurrency requirements, proponents of new or redevelopment may be required to upsize systems based on new peak flows, including consideration of future upstream conveyance conditions. These developer-funded and implemented conveyance system improvements will be paired with City implementation of 2015-2020 Capital Facilities Program project priorities for both wastewater conveyance and treatment systems, as supported by utility participation fees.</p> <p>Due to sufficient capacity within the existing wastewater treatment plant to absorb anticipated growth in the next six years, ongoing Environmental Services Department programs and planning, and City concurrency requirements for new development, increased demand for wastewater service under either alternative is not considered a significant impact</p>	No impacts other than those described under Impacts Common to All Alternatives.	Alternative 2 includes policy guidance to support provision of public services in the study area, consistent with current City practices. Successful implementation of this policy guidance is anticipated to have positive impacts on wastewater service.
<i>Environmental Conditions, Watersheds and Stormwater</i>	<p>City models show that current stormwater systems do not provide sufficient capacity to meet the stormwater LOS standard, under both existing and future developed conditions. As future growth occurs, all new development and redevelopment would be required to make stormwater system improvements consistent with the adopted Stormwater Management Manual, including providing flow control and water quality BMPs as necessary.</p> <p><i>Contaminated Sites.</i> No impacts are anticipated under either alternative related to known contaminated sites and potential contaminated sites in the study area. Investigation of conditions and potential clean-up would be required at potential contaminated sites (including the two known contaminated sites, and the five listed underground storage tank sites) prior to new development or redevelopment (Tacoma-Pierce County Health Department, 2015).</p>	<p>Stormwater impacts under Alternative 1 would be consistent with those described as common to both alternatives. However, there would potentially be less redevelopment and less implementation of stormwater management BMPs under Alternative 1 than under Alternative 2.</p> <p>All impacts to contaminated sites would be common to both alternatives.</p>	Stormwater impacts under Alternative 2 would generally be consistent with those described as common to both alternatives. However, Alternative 2 includes policy guidance for an area-wide stormwater strategy and includes a concept plan for this strategy. The concept plan includes a regional, infiltration and flood storage facility as well as permeable pavement for streets in areas with high soil permeability and with lower traffic volumes. Priority projects identified in the Draft Subarea Plan Transportation Chapter support the concept plan. Additionally, the Phase 1 development regulations proposed under Alternative 2 include increased standards for street trees and landscaping. These standards would expand the amount of "green infrastructure" in the study area over time, consistent with policy guidance for the area-wide stormwater strategy.

Element of the Environment	Impacts Common to Both Alternatives	Impacts of Alternative 1 No Action	Impacts of Alternative 2 Action Alternative
<i>Electricity</i>	<p>It is not anticipated that growth associated with the No Action or Action Alternative would place significant pressure on the existing electrical system or result in not meeting the LOS standard for residents or businesses within the study area. Tacoma Power would continue its practice of upgrading the electrical system, commensurate with anticipated growth in the study area and throughout their service area, in order to ensure adequate electrical services are provided. The rate structure would reflect the cost of adding new service and additional resources and infrastructure, as warranted. The City and Tacoma Power would continue to pursue energy efficiency measures to reduce energy consumption, thereby reducing stress on the utility as residential and jobs growth occurs.</p>	<p>No impacts other than those described under Impacts Common to All Alternatives.</p>	<p>The area-wide stormwater strategy would maximize improvements to address existing stormwater system deficiencies, expanding the use of the most effective strategies for City infrastructure projects and retrofit of existing development.</p> <p>All impacts to contaminated sites would be common to both alternatives.</p> <p>Alternative 2 includes policy guidance to support provision of public services in the study area and for requiring existing and new distribution lines to be placed underground at the time of new development, when feasible. Successful implementation of this policy guidance is anticipated to have positive impacts on electric service.</p>
<i>Natural Gas</i>	<p>Both alternatives propose continued growth and development, with slightly more anticipated under the Action Alternative. Additional development will increase the overall demand for natural gas within the study area; however, per capita demand is anticipated to remain relatively constant, and adequate infrastructure and supply exist to expand service provision.</p>	<p>No impacts other than those described under Impacts Common to All Alternatives.</p>	<p>Alternative 2 includes policy guidance to support provision of public services in the study area, consistent with current City practices. Successful implementation of this policy guidance is anticipated to have positive impacts on natural gas service.</p>
<i>Solid Waste</i>	<p>Solid waste utility needs will grow under both alternatives. However, ample capacity exists at the City's landfill to absorb increased waste as a result of more people living and working in the study area. The City's capacity to absorb solid waste generated by an additional 35,011 residents (city-wide) through 2020 exceeds projected growth in the study area and throughout Tacoma in the next four years. It is anticipated that capacity will continue to exceed projected growth and solid waste utility demand through 2040. The City will need to maintain and replace fleet vehicles and other resources used to administer solid waste collection, as necessary. This includes ensuring that curbside pickup policies and procedures are in place to meet growing demand from an increased density of commercial and residential customers, and that customer education and enforcement programs are supported.</p>	<p>No impacts other than those described under Impacts Common to All Alternatives.</p>	<p>Alternative 2 includes policy guidance to support provision of public services in the study area and for minimizing impacts on adjacent properties and open spaces associated with the siting, development and operation of utility services and facilities. The Phase 1 development regulations proposed under Alternative 2 include development standards to help minimize impacts on adjacent properties. Successful implementation is anticipated to have positive impacts on solid waste service.</p>

Element of the Environment	Impacts Common to Both Alternatives	Impacts of Alternative 1 No Action	Impacts of Alternative 2 Action Alternative
<i>Telecommunications</i>	Additional development will increase the demand for telecommunications services. However, it is anticipated that this demand can be met by existing telecommunications infrastructure and demand-driven improvements without impacts to capacity or service. As new customers enter into the system, service and infrastructure will be expanded to meet the new demand. The cost of system upgrades would be shared amongst rate-payers.	No impacts other than those described under Impacts Common to All Alternatives.	Alternative 2 includes policy guidance to support provision of public services in the study area, consistent with current City practices. Successful implementation of this policy guidance is anticipated to have positive impacts on telecommunications service.

MITIGATION MEASURES

This EIS contains three types of mitigation measures: 1) incorporated plan features, 2) regulations and commitments, and 3) other mitigation measures. Incorporated plan features are mitigation measures contained in plans and policies that are adopted or planned for adoption as part of the proposed action. Regulations and commitments are mitigation measures contained in regulations or other requirements that are adopted or planned for adoption as part of the proposed action. Other mitigation measures include any mitigation measures not included in the other two categories.

LAND USE

Incorporated Plan Features

- Under Alternative 1, the City's Comprehensive Plan establish future land uses that would provide sufficient development capacity to meet the City's 2040 growth targets, allow for intensive land use and building patterns that would support City and regional planning goals for regional centers, and mitigate for potential land use compatibility impacts.
- Under Alternative 2, new future land use designations are proposed that would provide sufficient development capacity to meet the City's 2040 growth targets for the study area and for the South Tacoma Way/Manufacturing Industrial Center, allow for intensive land use and building patterns that would support City and regional planning goals for regional centers, and mitigate for potential land use compatibility impacts.

Regulations and Commitments

- Under both alternatives, existing City development standards for building character, noise, light and glare are anticipated to help mitigate for potential compatibility impacts.
- Under both alternatives, the zoning regulations that implement the City's current Comprehensive Plan would provide sufficient development capacity to meet the City's growth targets, support goals for regional centers, and mitigate for potential land use compatibility impacts.
- Under Alternative 2, proposed Phase I code amendments would further promote land use compatibility, providing a fine-grained distribution of land use density and intensity throughout the neighborhood and new design standards to enhance community character.

Other Mitigation Measures

- Under both alternatives, monitor development trends to evaluate whether they support achievement of the 2040 growth targets and city and regional goals for the Tacoma Mall neighborhood, and consider development incentives or other measures if needed.

PLANS AND POLICIES

Incorporated Plan Features

- Both alternatives would accommodate the 2040 growth targets for housing and employment identified in the Comprehensive Plan, as well as the future vision for land use, housing, and community character in the Tacoma Mall RGC.

Regulations and Commitments

- As required by the GMA, the City will submit the new Subarea Plan and updated regulations to the WA Department of Commerce for review and comment by the state prior to final adoption.
- Consistent with the Puget Sound Regional Council's (PSRC) processes for designated RGCs, the City will submit the proposed Subarea Plan and RGC boundary expansion to PSRC for review and approval prior to final adoption.

Other Mitigation Measures

- In order to achieve consistency with Comprehensive Plan policy UF-2.4, the policy should be revised concurrent with the proposed future expansion to the RGC to recognize the topographic, transportation and land use features that are the basis for the proposed expansion. Alternatively, the City could elect to maintain the existing policy and not expand the RGC as proposed.
- Proposed development standards should be reviewed to ensure consistency with adopted comprehensive plan policy guidance.

HOUSING

Incorporated Plan Features

- Under Alternative 2, the Subarea Plan includes specific policy strategies for promoting affordable housing, including working with partners to ensure that 25 percent of new housing built in the study area is affordable to households earning 80 percent or less of Pierce County median income, that 50% of the total housing in the study area is affordable to households earning 80% or less of Pierce County median income, that development standards enable construction of moderately and affordably priced housing, for identifying opportunities for very-low and

special needs housing, and for monitoring the supply of affordable housing and maintaining no net loss of the current stock.

- Under Alternative 2, the transportation improvements proposed under the Subarea Plan could reduce transportation costs for neighborhood residents, which could have a positive impact on housing affordability.
- Under both alternatives, the City’s Comprehensive Plan provides guidance to ensure that at least 25 percent of the City’s housing targets are affordable to households earning 80 percent or less of area median income.

Regulations and Commitments

- Under Alternative 1, existing zoning regulations allow for a wide range of housing types.
- Under Alternative 2, proposed zoning designations would allow for a wide range of housing types.
- Under both alternatives, the City’s Multifamily Tax Exemption Program incentivizes affordable housing development in the RGC, and Chapter 1.39 of the City’s Municipal Code outlines other incentives that could be used by the City in the future to encourage affordable housing in the study area, if resources are available to implement them.

Other Mitigation Measures

- Under Alternative 1, consider a new commitment similar to that proposed under Alternative 2 to monitor housing trends to evaluate whether they support the 2040 growth targets and City and regional housing goals, and consider regulatory changes or other measures if needed.
- Under both alternatives, consider updating the X-District Height Bonus Program to include affordable housing incentives in the Tacoma Mall RGC.

AESTHETICS AND URBAN DESIGN

Incorporated Plan Features

- Under both alternatives, consistent with the Tacoma Comprehensive Plan, enhance the public realm, internal pedestrian connectivity and connectivity to regional transportation facilities.
- Under Alternative 2, policy guidance for urban design in the Draft Subarea Plan discussed above would reduce the potential for incompatible land uses and abrupt transitions in scale, if successfully implemented.
- Under Alternative 2, policy guidance for the streetscape and public realm in the Draft Subarea Plan discussed above is expected to have positive impacts on aesthetics and urban design, if successfully implemented.

- Under Alternative 2, if successfully implemented policy guidance in the Draft Subarea Plan would provide stricter standards for street vacations than are currently in place, which would have positive impacts on the streetscape and public realm.

Regulations and Commitments

- Under Alternative 2, new future land use designations and zoning designations are proposed that would prevent incompatible land uses and reduce the potential for abrupt transitions in building bulk and scale over the long term.
- Under Alternative 1, existing land use designations and zoning designations would prevent incompatible land uses.
- Under Alternative 2, new tree canopy standards, design standards, street connectivity requirements and pedestrian street designations are proposed that would expand the streetscape and public realm as well as improving its aesthetic quality, mitigating increased demand for these amenities as growth occurred. Additionally, current City development regulations not changed by the Phase 1 code amendment would help to mitigate for negative impacts to aesthetics and urban design.
- Under Alternative 1, new development would occur under the City's existing standards for building design, pedestrian designated streets, landscaping and buffering, which would help to strengthen the existing pedestrian environment, add green features and provide buffers between different types of land uses.
- Under Alternative 2, expanded pedestrian street designations are proposed which would mitigate for shading impacts on those streets.
- Under Alternative 1, existing City building standards are expected to mitigate for shading impacts on currently designated pedestrian streets.
- Under both alternatives, existing City standards for light and glare and expected to mitigate for impacts of new light sources generated by future development.
- Under both alternatives, existing City criteria for street vacations are anticipated to mitigate for significant negative impacts to the public streetscape if future developers petition the City for street vacations in the study area.

Other Mitigation Measures

- Under both alternatives, monitor new development trends and consider additional regulations if needed to strengthen aesthetics and urban design.
- Under both alternatives, consider adoption of shade and shadow measures to protect public places other than those

on currently designated pedestrian streets, such as parks, schools and other popular pedestrian routes.

- Under both alternatives, consider application of the City's View-Sensitive Overlay District, or other measures, to protect public places that have scenic views.
- Under Alternative 1, consider adopting regulations to preserve the character of the Madison District and Lincoln Heights District residential neighborhoods, similar to those proposed under Alternative 2.
- Under Alternative 2, consider adopting standards for non-conforming development such as those that the City has in place for the Downtown zoning districts.
- Under Alternative 2, after adoption of the Subarea Plan and the Phase 1 code amendments identify additional code changes and other actions needed to implement policy guidance in the plan related to aesthetics and urban design, as called for in the Land Use Chapter of the Subarea Plan.

CULTURAL RESOURCES

Incorporated Plan Features

- Under both alternatives, the Tacoma Comprehensive Plan Design and Development Element includes Goal DD-13 Protect and preserve Tacoma's historic and cultural character. This goal is supported by ten policies intended to ensure that valuable historic and cultural resources are identified, protected and restored.
- Under both alternatives, Tacoma's Historic Preservation Plan, adopted in 2011, contains goals, policies and actions that provide clear policy guidance for historic preservation and protection of cultural resources.

Regulations and Commitments

- Under both alternatives, Tacoma Municipal Code Section 13.07, Landmarks and Historic Special Review Districts, This ordinance states the purpose of the City's goals and responsibilities to promote preservation, enhance awareness and protect the finite resources that define the community. It establishes criteria for the designation of buildings and districts, as well as policies and review procedures for their treatment.
- Under both alternatives, Tacoma Municipal Code Section 1.42 establishes the Landmarks Preservation Commission (LPC). The Commission reviews and approves applications for changes to registered landmarks and buildings within local historic districts, reviews nominations and advises City Council regarding additions to the Landmarks Register, and participates in the planning process.

- Under both alternatives, applicable state regulations include RCW Chapter 27.44 (Indian graves and records) and Chapter 27.53 (Archaeological sites and records). Development or uses that could impact these sites must comply with the State’s guidelines on archaeological excavation and removal as described in WAC 25-48.

Other Mitigation Measures

- Under Alternative 2, amend Tacoma Municipal Code Section 13.12.570 that sets forth provisions for addressing archaeological, cultural, and historic resources in the Downtown Tacoma Regional Growth Center to reflect adoption of the Subarea Plan and completion of this EIS.
- Under both alternatives, continue to evaluate opportunities for identifying and protecting cultural resources. Possible future actions, depending on community interests, include:
 - Provide funding for a comprehensive survey of study area buildings that are eligible for nomination to the Washington State Register, the National Historic Register or the Tacoma Historic Register.
 - In preparing design guidelines, consider how new development can complement and support historic character, context and general treatment of historic resources. Besides guidelines on scale, height, mass and materials of new and infill buildings, attention should be given to signage, accessibility issues, and appropriate seismic and energy retrofits in older buildings.
 - Consider the use of zoning incentives to protect and promote identified historic resources and conservation districts.
 - Actively seek partners to build a cultural resources information database to identify geographic areas with the highest probability for encountering significant resources.
 - Identify and seek partnerships with existing agencies or institutions with an interest in history and preservation.

TRANSPORTATION

Incorporated Plan Features

- For both alternatives, the City of Tacoma Transportation Master Plan and Transportation Element of the Comprehensive Plan identifies recommended transportation improvement projects and policy guidance to promote multi-modal mobility and safety.
- For both alternatives, the City of Tacoma Complete Street Guidelines provide guidance for the development of streets to enable safe and convenient access and travel for all modes of travel.

- Under Alternative 2, City of Tacoma Draft Tacoma Mall Neighborhood Subarea Plan, if adopted, would provide guidance for enhancements beyond those provided in the TMP, including increased connectivity, greater bicycle and pedestrian mobility, improved access to transit and improved vehicular traffic flow.

Regulations and Commitments

- Under Alternative 2, Tacoma Municipal Code Section 13.12.580—Traffic Impact Assessment should be amended to apply to the Tacoma Mall Neighborhood, allowing an expedited assessment of transportation impacts and mitigation to address safety, circulation, and capacity issues.
- Under Alternative 2, adopt Tacoma Municipal Code Section 13.06.660 Site Approvals to provide a process to consider opportunities to improve transportation connectivity in areas with large blocks.
- For both alternatives, Tacoma Municipal Code Section 13.15—Commute Trip Reduction helps to reduce peak hour congestion.
- For both alternatives, Tacoma Municipal Code Section 13.16—Concurrency Management System ensures that transportation improvements that address the impacts of development are provided concurrent with the development.

Other Mitigation Measures

- Under Alternative 2, monitor operations at S. Lawrence St/S Tacoma Way and consider access restrictions if long delays materialize. For example, S Lawrence St could be restricted to right in-right out operations at this intersection.

PUBLIC SERVICES

Fire and Emergency Services

Incorporated Plan Features

- Under Alternative 2, successful implementation actions are expected to increase coordination of planning efforts for provision of fire and emergency medical services in the study area.

Regulations and Commitments

- Under both alternatives, ongoing City capital facilities improvement, budgeting, and operational planning efforts are anticipated to address incremental increases and other changes in demand for fire services, including the need for facility improvements and additional apparatus.

- Under both alternatives, all potential new development in the study area would be constructed in compliance with the City's current fire code.
- Under both alternatives, a portion of the tax revenue generated from potential redevelopment in the study area would accrue to the City and be used to help fund fire and emergency services.

Other Mitigation Measures

- Under both alternatives, as part of the City's ongoing capital facility improvement, budgeting and operational planning efforts, prioritize identification of funding for the facility improvements needed to serve planned growth in the study area.
- Under Alternative 1, consider collaboration between the Tacoma Fire Department and Planning and Development Services to develop data on the number of calls in the study area and the current and projected daytime populations in order to assist in forecasting future facilities needs to serve the study area, similar to what is proposed under Alternative 2.

Police

Incorporated Plan Features

- Under Alternative 2, successful implementation of policy guidance in the Draft Subarea Plan described above would likely have positive impacts on police services in the study area by increasing coordination on planning for police services, engaging community partners in improving safety, encouraging development of underutilized lands, integrating CPTED principles into the development code, and encouraging more people to make use of and take ownership of public spaces.

Regulations and Commitments

- Under both alternatives, ongoing City capital facilities and operational planning efforts are anticipated to address changes in demand for police services, including staffing needs and trends in call service types and locations over time.
- Under both alternatives, a portion of the tax revenue generated from potential redevelopment in the study area would accrue to the City and be used to help fund police services

Other Mitigation Measures

- Under both alternatives, engage in coordination between the Tacoma Police Department, Planning and Development Services and building managers in the study area to establish emergency building access agreements and

procedures to help mitigate for impacts on police response time related to multistory buildings.

- Under both alternatives, anticipated development of vacant and underutilized parcels in the study area may help to reduce crime.
- Under Alternative 1, consider including CPTED design as a development review criteria for the Tacoma Mall neighborhood, similar to what is proposed under Alternative 2.
- Under Alternative 1, consider increasing current efforts to work with local organizations and neighborhood groups to reduce crime rate and improve public safety, similar to what is proposed under Alternative 2.
- Under Alternative 1, consider enhancing streets and public spaces to encourage more people to make use of and take ownership of these facilities, similar to what is proposed under Alternative 2.

Schools

Incorporated Plan Features

- Under Alternative 2, successful implementation of policy guidance in the Draft Subarea Plan described above would likely have positive impacts on school services by enhancing or adding new school facilities in the study area.

Regulations and Commitments

- Under both alternatives, ongoing Tacoma Public Schools capital facilities management planning is anticipated to be sufficient to address increases in student population.
- Under both alternatives, continued sharing of information between the City and the District, including population targets and enrollment projections, is expected to inform each other's long-range planning efforts and help to prevent shortfalls in school capacity.

Other Mitigation Measures

- Under Alternative 2, encourage participation by the City and community stakeholders in the Tacoma Public Schools upcoming Master Planning effort to ensure that the Subarea Plan growth targets and policy guidance are considered.

Public Parks, Open Spaces and Recreation Facilities

Incorporated Plan Features

- Under Alternative 2, successful implementation of policy guidance in the Draft Subarea Plan described above would likely have positive impacts on parks and open space

services by expanding facilities and programming in the study area through collaboration with parks partners.

Regulations and Commitments

- Under both alternatives, ongoing parks and open space resource management planning efforts would allow the City and Metro Parks Tacoma to plan for changes in demand for parks and open space and in facilities maintenance and development needs over time.

Other Mitigation Measures

- Under Alternative 1, continue the ongoing discussion about how best to serve high density urban centers like the Tacoma Mall RGC, including consideration of new LOS standards for urban parks, similar to what is proposed under Alternative 2.

UTILITIES

Water System

Incorporated Plan Features

- Under Alternative 2, successful implementation of Goal US-1 is expected to help ensure adequate provision of water services in the study area. Proposed development in the subarea would be reviewed for consistency with this goal and other policy guidance in the Subarea Plan, as well as any associated regulatory requirements.

Regulations and Commitments

- Under both alternatives, TPU currently plans to replace aging cast iron water pipes ranging in size from six inch to 12 inch diameter located in Union Avenue from South 38th Street to South 47th Street (personal communication with Tacoma Public Utility staff [G.Whitley], August 2015). The segments planned for replacement are shown in Figure 3.8-1.
- Under both alternatives, proponents of future development will be required to pay for utility system improvements necessary to facilitate the development projects.

Other Mitigation Measures

- Under both alternatives, continue ongoing water conservation measures and programs within the Subarea, as supported by One Tacoma Comprehensive Plan Policy PFS-7.10 (Promote water reuse and water conservation opportunities that diminish impacts on water, wastewater, and surface water systems). Implement programs to educate water users on conservation measures at home and at work, and encourage implementation of emerging

approaches to conserve water, including use of incentives programs.

Wastewater

Incorporated Plan Features

- Under Alternative 2, successful implementation of Goal US-1 is expected to help ensure adequate provision of wastewater services in the study area. Proposed development in the subarea would be reviewed for consistency with this goal and other policy guidance in the Subarea Plan, as well as any associated regulatory requirements.

Regulations and Commitments

- Under both alternatives, wastewater system improvements will occur over time, including replacement and upsizing of aging sanitary sewer pipes and extensions as a result of new development or redevelopment (Dressler, 2016; personal communication with City Environmental Services staff, August 2015).
- Under both alternatives, wastewater system capacity determinations and upgrade requirements will be made by the City on a case-by-case basis for development projects resulting in greater than 20 dwelling units, and commercial or industrial developments which will result in a peak daily flow of more than 5,000 gpd.

Other Mitigation Measures

- Under both alternatives, new development and redevelopment may reduce per-capita water demand (and therefore, wastewater service demand) by using newer, low- or no-flow plumbing fixtures and equipment.
- Under both alternatives, ongoing implementation of TPU's *Ways to Save at Home* program may extend per-capita water demand reductions to existing residences within the study area.

Environmental Conditions, Watersheds and Stormwater

Incorporated Plan Features

- Under Alternative 2, successful implementation of policy guidance in the Draft Subarea Plan described above would likely have positive impacts on stormwater service in the study area. Proposed development in the subarea would be reviewed for consistency with this goal and other policy guidance in the Subarea Plan, as well as any associated regulatory requirements.

Regulations and Commitments

- Under Alternative 2, proposed Phase 1 code amendments to implement the Subarea Plan include new design standards including increased requirements for tree plantings and landscaping, which would support stormwater management.
- Under both alternatives, Tacoma’s stormwater management requirements and ongoing efforts would support stormwater service. These are described in:
 - Tacoma Municipal Code 12.08
 - 2016 Stormwater Management Manual (City of Tacoma, 2016a)
 - Stormwater Management Program Plan (City of Tacoma, 2016b)
- Under both alternatives, update the requirements for the South Tacoma Groundwater Protection District included in Tacoma Municipal Code 13.09 and Tacoma-Pierce County Health Department guidelines to maintain consistency with agreed upon South Tacoma Groundwater Protection District guidelines and other stormwater management requirements.

Other Mitigation Measures

- None.

Electricity

Incorporated Plan Features

- Under Alternative 2, successful implementation of Goal US-1 and Action US-2 is expected to support adequate provision of electric services in the study area and encourage undergrounding of electrical infrastructure. Proposed development in the subarea would be reviewed for consistency with this and other policy guidance in the Subarea Plan, as well as any associated regulatory requirements.

Regulations and Commitments

- Under both alternatives, TPU will continue investments in conservation to lower overall energy usage. Conservation is an integral component in TPU’s resource strategy, and as a result has contributed to reported annual load reductions as high as 35 MW (City of Tacoma, 2015a).

Other Mitigation Measures

- None.

Natural Gas

Incorporated Plan Features

- Under Alternative 2, successful implementation of Goal US-1 is expected to help ensure adequate provision of natural gas service in the study area. Proposed development in the subarea would be reviewed for consistency with this goal and other policy guidance in the Subarea Plan, as well as any associated regulatory requirements.

Regulations and Commitments

- Under both alternatives PSE would continue its practice of modifying its natural gas delivery system every year to address existing and new customer growth, load changes that require system reinforcement, rights-of-way improvements, and pipeline integrity issues. In addition, PSE continuously adds and modifies infrastructure to meet gas volume and pressure demands (City of Tacoma, 2015a).
- Under both alternatives, PSE would continue to maintain its Integrated Resource Plan (IRP), which is updated every two years. The IRP identifies methods to provide dependable and cost effective natural gas service that addresses customer demands. During the summer months, when wholesale gas prices and customer demand are low, PSE buys and stores significant amounts of natural gas in large underground facilities. The gas is then withdrawn in winter when customer usage is highest, ensuring a reliable supply is available (City of Tacoma, 2015a).

Other Mitigation Measures

- None.

Solid Waste

Incorporated Plan Features

- Under Alternative 2, successful implementation of Goal US-1, Goal US-2 and associated actions is expected to help ensure adequate provision of solid waste service in the study area and to address needs for minimizing impacts of solid waste service on adjacent properties. Proposed development in the subarea would be reviewed for consistency with this and other policy guidance in the Subarea Plan, as well as any associated regulatory requirements.

Regulations and Commitments

- Under Alternative 2, proposed development standards in the Phase 1 code amendment package would mitigate for impacts of solid waste service on adjacent properties, helping to implement related policy guidance in the Draft Subarea Plan.

Other Mitigation Measures

- Under both alternatives, the Environmental Services Department should review policies and programs that direct solid waste collection practices, as well as enforcement for solid waste customers. As future development within the study area and throughout the City increases demand, the Environmental Services Department must ensure that adequate curbside service is provided and container set-out guidelines are enforced. Customer education should be supported so as to reduce overall waste generation, divert garbage waste to optional recyclable and yard waste collection services, and maximize compliance with solid waste set-out guidelines.

Telecommunications

Incorporated Plan Features

- Under Alternative 2, successful implementation of Goal US-1 is expected to help ensure adequate provision of telecommunication service in the study area. Proposed development in the subarea would be reviewed for consistency with this goal and other policy guidance in the Subarea Plan, as well as any associated regulatory requirements.
- Under both alternatives, consistent with Comprehensive Plan policy, the City will work with service providers to maintain existing infrastructure and invest in expanded or new infrastructure to support planned growth and the development patterns that are called for in the Comprehensive Plan's Land Use Element (City of Tacoma, 2015a).

Regulations and Commitments

- None.

Other Mitigation Measures

- None.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

LAND USE

No significant unavoidable adverse land use impacts are anticipated under either alternative.

PLANS AND POLICIES

No significant unavoidable adverse impacts on plan and policy consistency are anticipated.

HOUSING

No significant unavoidable adverse housing impacts are anticipated under either alternative.

AESTHETICS AND URBAN DESIGN

No significant unavoidable adverse to aesthetics and urban design are expected under either alternative.

CULTURAL RESOURCES

No significant unavoidable adverse impacts to historic or cultural resources are anticipated under either alternative.

TRANSPORTATION

The mitigation measures recommended for the S Lawrence St/S Tacoma Way intersection are expected to reduce the impact to a less than significant level. Therefore, no significant unavoidable adverse impacts to transportation and parking are expected.

PUBLIC SERVICES

No significant unavoidable adverse impacts to fire and emergency, police, school, and parks/open space services are anticipated.

UTILITIES

No significant unavoidable adverse impacts in demand for domestic water, wastewater, electrical, natural gas, solid waste and telecommunications service or to stormwater infrastructure, flow quantities, or quality are anticipated.

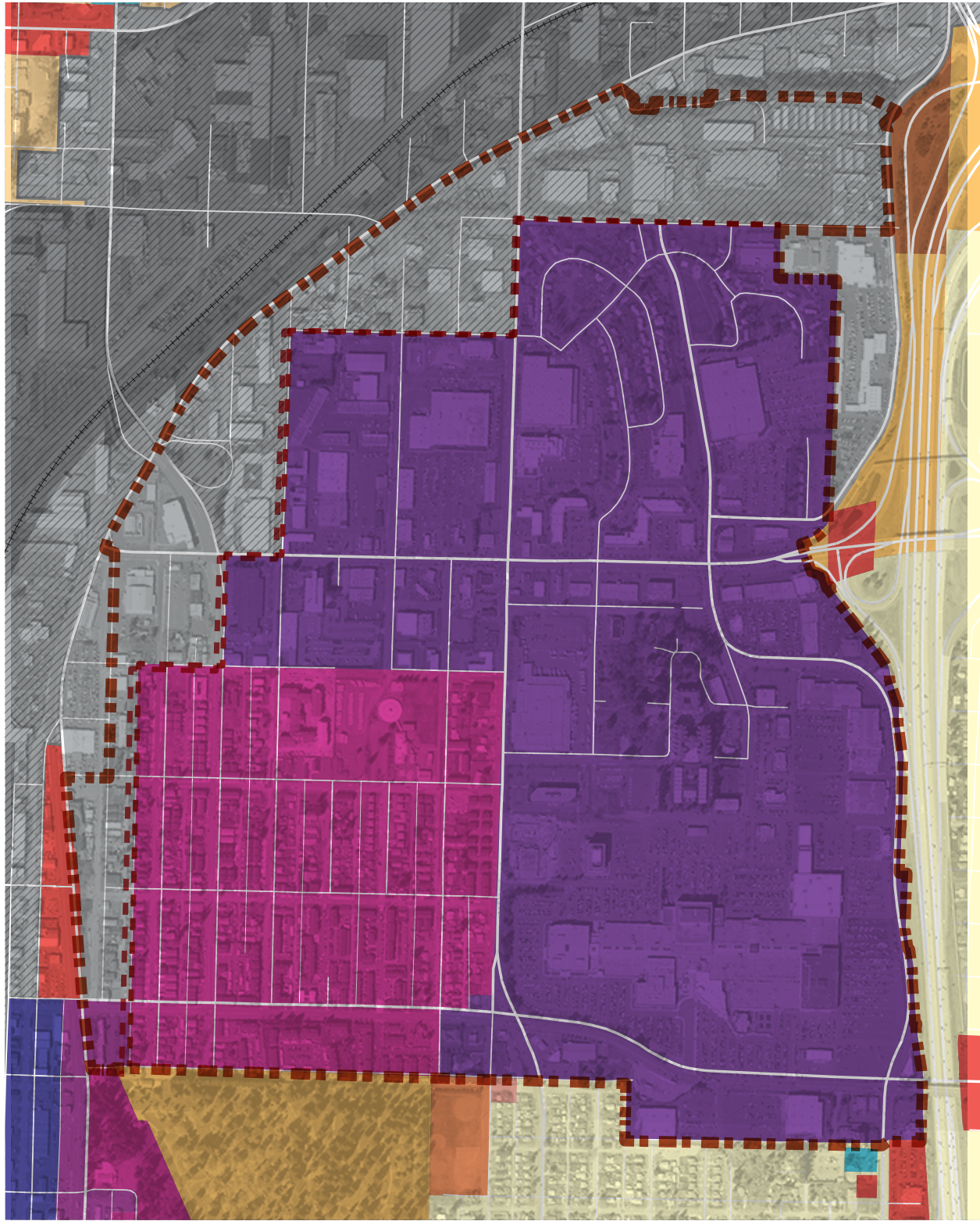
1.10 PREFERRED ALTERNATIVE

After considering the impacts, mitigation measures and potential significant adverse environmental impacts analyzed in this Final EIS and summarized above, the City of Tacoma has determined that the Action Alternative is the preferred alternative for the Tacoma Mall Neighborhood Subarea.

This Final EIS demonstrates that the actions and outcomes anticipated under the Action Alternative compared to the No Action Alternative can be expected to result in significant environmental benefits in both the Subarea and the greater region. As described in Chapter 3 of this Final EIS, these potential benefits include:

- Fostering an attractive urban neighborhood including walkable streets, parks, attractive green infrastructure, trees, and an inviting streetscape
- Minimized incompatibilities between differing land uses

- An increased likelihood of meeting City and regional job and housing growth targets
- Promotion of regional conservation of farms, forests and the health of the Puget Sound
- Transportation mode shift through enhanced transit, bicycle and pedestrian options, Transportation Demand Management and access management measures
- Decreased reliance on Single-Occupancy Vehicle travel, and a corresponding reduction in total greenhouse gas emissions
- Fiscally responsible, cost-effective investments in infrastructure that serve multiple objectives
- Infiltrated stormwater that recharges clean water to the South Tacoma Aquifer
- Alleviated flooding and improved water quality in the neighborhood, Chambers Flett Creek watershed and the Puget Sound
- Multiple environmental, livability, public health, and economic benefits resulting from increased tree canopy coverage
- A broad range of housing choices and costs
- Increased arts and cultural activities and a more positive image for the neighborhood
- Convenient access to the goods and services needed in daily life
- Improved safety for residents, workers and visitors
- Greater access to parks, open spaces and green features
- A stronger local economy and more diverse employment base
- Cost-effective utilities and infrastructure to support existing and planned development
- Minimized impacts associated with the siting and operation of utilities and services



- | | | | |
|--|---|---|---|
| <ul style="list-style-type: none"> Expanded Neighborhood Subarea Existing RGC Boundary | <ul style="list-style-type: none"> R2 Single Family Dwelling R2-SRD Single Family Dwelling-Special Review R3 2-Family Dwelling R4L Low Density Multiple Family Dwelling R4 Multiple Family Dwelling | <ul style="list-style-type: none"> T Transitional C1 Commercial C1 Commercial M1 Light Industrial M2 Heavy Industrial | <ul style="list-style-type: none"> RCX Residential Commercial Mixed-Use NCX Neighborhood Mixed-Use UCX Urban Center Mixed-Use CIX Commercial Industrial Mixed-Use |
|--|---|---|---|

Figure 1.2. Existing Zoning Classifications

Source: *City of Tacoma, 2016; 3 Square Blocks, 2016*

PROPOSAL

2.1 INTRODUCTION

OVERVIEW OF THE PROPOSED ACTION

The proposal by the City of Tacoma consists of the following related actions:

1. Adoption of a Tacoma Mall Neighborhood Subarea Plan, consistent with the City's Comprehensive Plan and Washington State Growth Management Act (GMA).
2. A set of code changes referred to as Phase I amendments that would be adopted concurrent with the Subarea Plan to support its implementation. These include an area-wide rezone that would include new zoning boundaries, height limits and minimum density requirements; new large parcel standards; additional pedestrian street designations; and new design standards for tree cover, landscaping, parking lots, drive through facilities and other features.
3. Updates to the City's Comprehensive Plan Future Land Use Map to make the following related changes:
 - a. Expand the Tacoma Mall Regional Growth Center designation by 116 acres, consistent with the study area considered in this EIS;
 - b. Reduce the area of the South Tacoma Way Manufacturing and Industrial Center by 82 acres, and
 - c. Reduce the area of the South Tacoma Way Neighborhood Center by 2 acres.
4. Adoption of streamlined SEPA procedures for future project-level review in the Tacoma Mall Neighborhood Subarea Plan area consistent with the optional subarea plan procedures established in RCW 43.21c.420. As part of this Proposed Action, the City is also designating the Tacoma Mall Neighborhood Subarea Plan area as a planned action pursuant to RCW 43.21c.031 and identifying infill exemptions pursuant to RCW 43.21c.420.

This chapter describes this proposal and alternatives that are considered in this EIS.

PROPONENT

The Tacoma Mall Neighborhood Subarea Plan is proposed by the City of Tacoma. The City is the lead agency for this Draft EIS.

PROJECT LOCATION

The Tacoma Mall Subarea is located approximately 2.5 miles southwest of downtown Tacoma (Figure 2.1). The study area is generally bounded by South Tacoma Way on the west and north, Interstate 5 on the east, and one block south of South 47th and 48th streets on the south. As shown in Figure 2.2, the Tacoma Mall Regional Growth Center (RGC), a designation established by the City of Tacoma and Puget Sound Regional Council, is located within the study area. The Tacoma Mall RGC is approximately 485 acres in size; and the portion of the study area located outside the RGC consists of approximately 116 acres, for a total study area of approximately 601 acres.

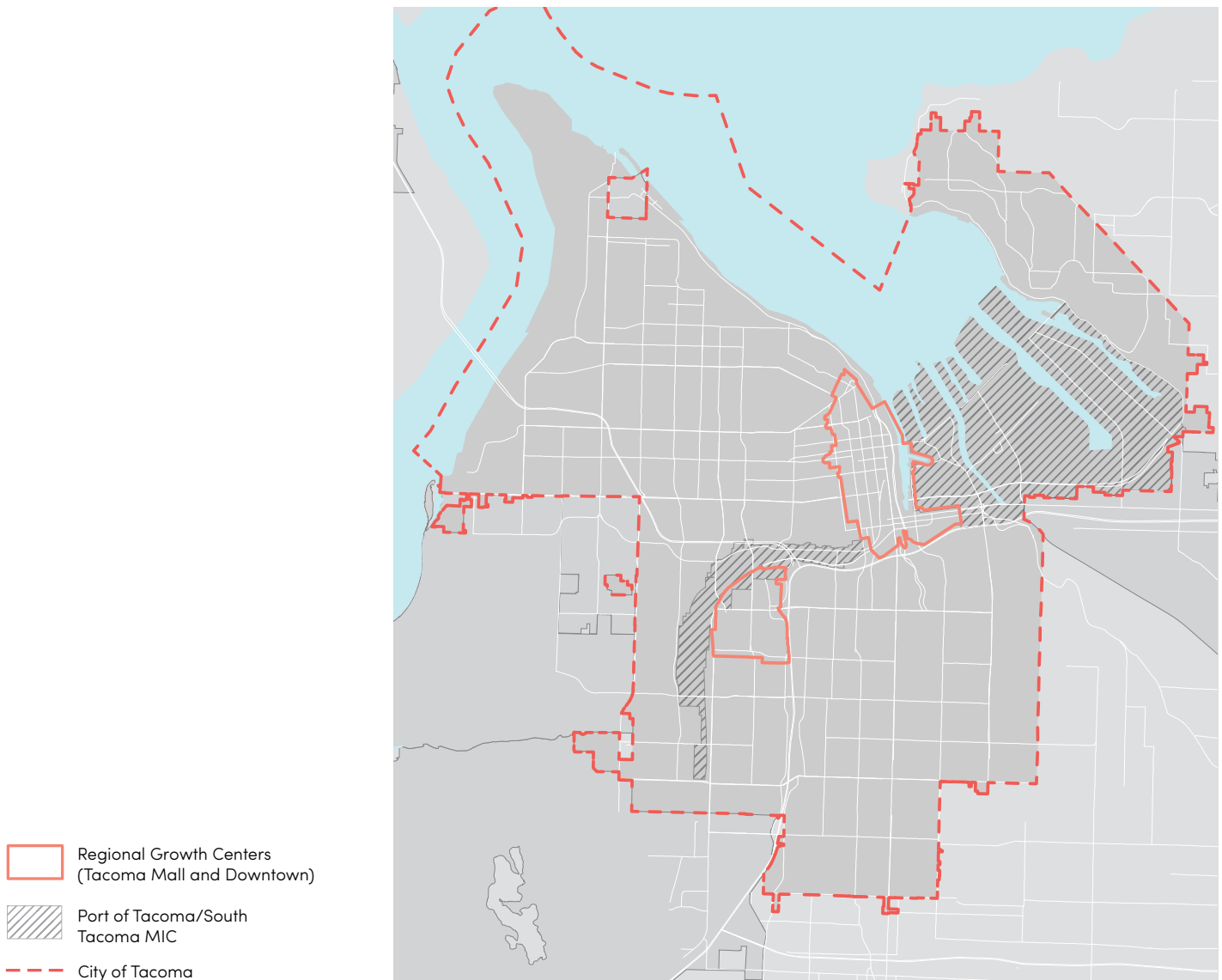


Figure 2.1. Vicinity map

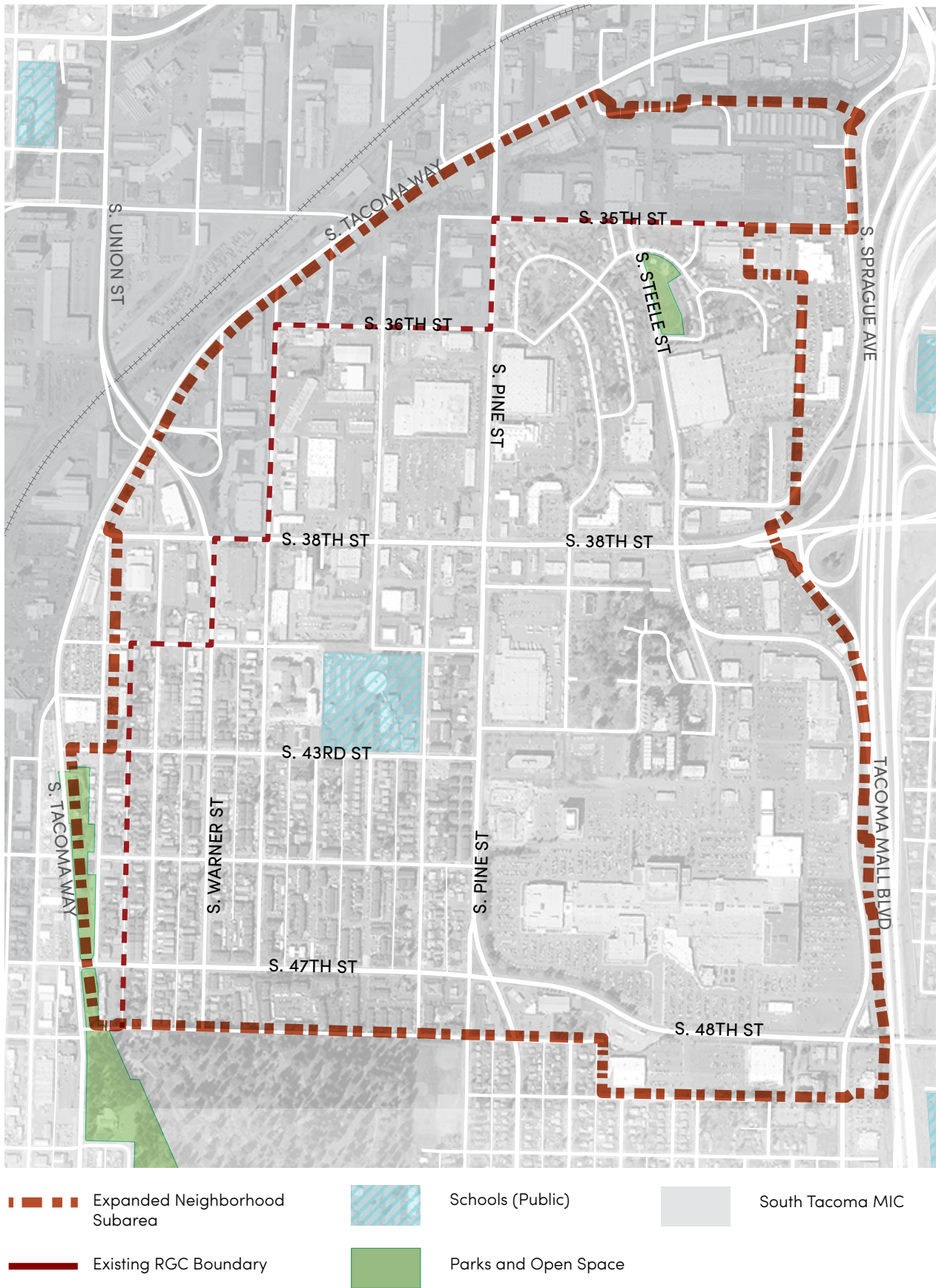


Figure 2.2. Study Area

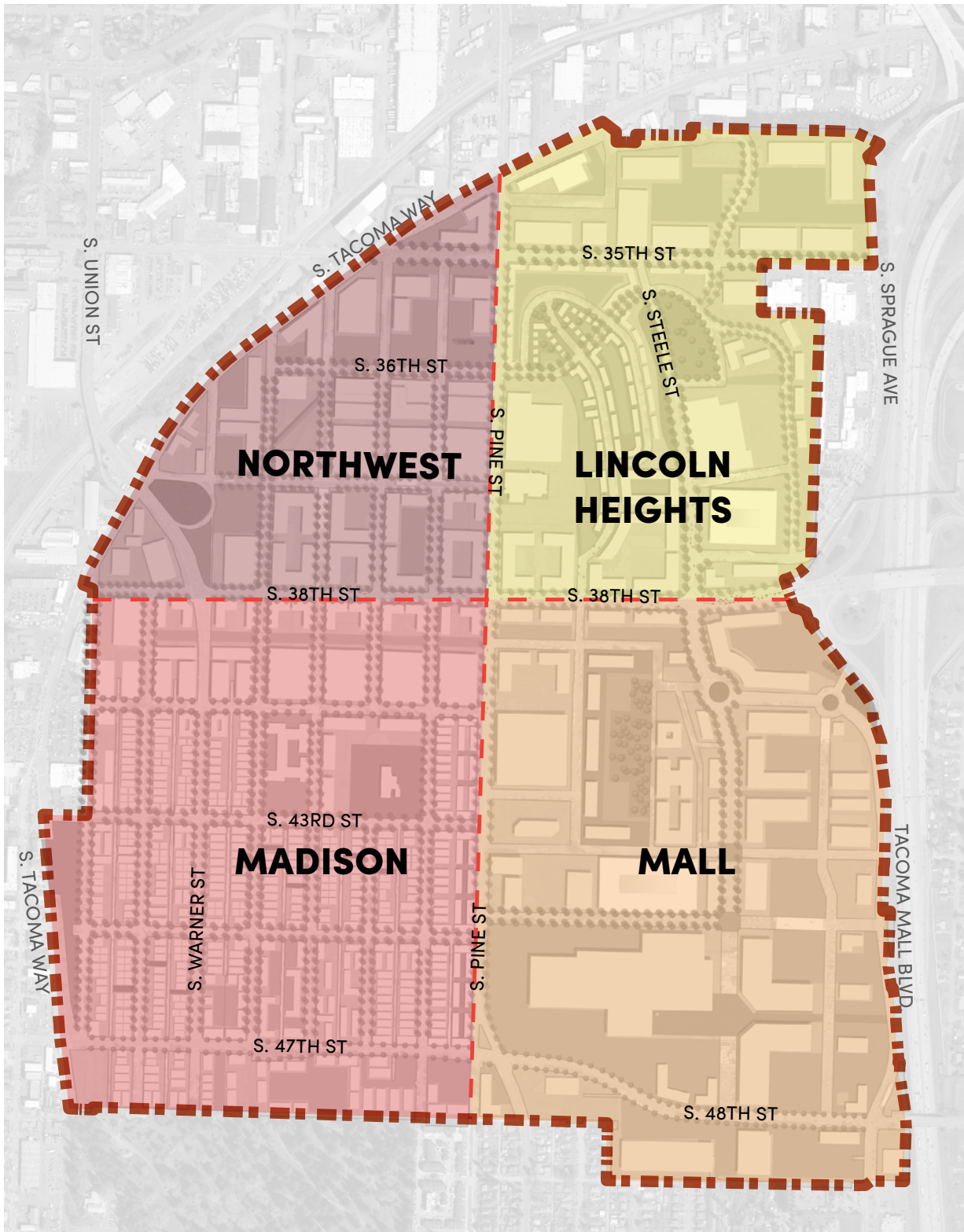


Figure 2.3. Study Area quadrants

Vision 2040 is a regional strategy prepared by the Puget Sound Regional Council to accommodate projected growth in the Puget Sound region. It contains an environmental framework, a numeric regional growth strategy, policy sections guided by overarching goals as well as implementation actions and monitoring measures.

The regional growth strategy is the hallmark of VISION 2040. The strategy is a guide for distributing future job and housing growth. It supports a pattern of urbanization that minimizes environmental impacts, supports economic prosperity, promotes adequate and affordable housing, improves mobility, and makes efficient use of existing infrastructure.

Regional Growth Centers are PSRC-designated urban centers within major cities in the Puget Sound region. Vision 2040 aims to target a large share of future growth to these areas, while also distributing growth among other urban areas. The Tacoma Mall RGC is one of two RGCs in the City and one of 29 RGCs in the region.

Where it would help in understanding the proposal and potential impacts in this EIS, smaller geographic areas within the study area are examined. These smaller areas consist of the four quadrants created by the study area major rights-of-way, shown in Figure 2–3. The Northeast Quadrant consists of 129.2 acres, the Northwest Quadrant 93.8 acres, the Southwest Quadrant 183.7 acres and the Southeast Quadrant 194.2 acres.

PROJECT BACKGROUND

VISION 2040 & REGIONAL GROWTH CENTER DESIGNATION

In 1995, the Puget Sound Regional Council (PSRC) designated the Tacoma Mall Regional Growth Center, identifying that the area plays an important role as a center for the region's most significant business, governmental and housing growth under PSRC's Vision 2040 plan. Vision 2040 describes regional growth centers as follows:

Regional growth centers are areas of higher-intensity development and contain a mix of land uses and services. Major regional investment for transportation and other infrastructure should be prioritized for these locations. (PSRC)

Consistent with this regional designation, the Tacoma Comprehensive Plan also designates the Tacoma Mall Regional Growth Center and assigns a significant amount of the City's planned employment and residential growth to this Center.

NEP GRANT & SUBAREA PLANNING PROCESS

In 2014, the City was awarded a National Estuary Program (NEP) Puget Sound Watershed Protection and Restoration Grant to prepare an innovative subarea plan and EIS that sets the stage for transition of the Tacoma Mall RGC into a compact, complete neighborhood consistent with Vision 2040, the Puget Sound Action Agenda, the City of Tacoma Climate Action Plan and Comprehensive Plan. The subarea planning process is intended to promote a healthy environment and support regional efforts to reduce stormwater impacts to freshwater systems. The EIS is intended to identify the environmental impacts associated with planned growth and development on an area-wide basis and provide for proportional, substantive mitigation for any identified significant adverse environmental impacts.

Alternatives considered in this Draft EIS include No Action—future growth would continue based on existing development regulations—and the Action Alternative—future growth assuming a new vision for the area and updated development regulations, transportation system, stormwater infrastructure, and parks and open space network.

OBJECTIVES OF THE PROPOSAL

The City has identified the following specific proposal objectives:

- Promote sustainable growth for a livable, transit-ready neighborhood, while strengthening the Tacoma Mall neighborhood role as a regional retail center
- Provide for the transition from an auto-centric regional shopping area and adjacent residential areas to a compact complete neighborhood
- Enhance the function of the natural environment in the neighborhood, including improving stormwater management
- Strengthen neighborhood identity and culture with four distinct character districts and more complete infrastructure
- Improve mobility with a streets network that enables mode shift and increased separation of local and regional trips
- Promote development consistent with *Vision 2040*, the *Puget Sound Action Agenda*, and Tacoma's *Comprehensive Plan*, *Climate Action Plan* and *Tacoma 2025*
- Foster equity and empowerment for area residents and workers
- Leverage public and private partnerships and investment to stimulate large-scale population and employment growth with the study area that:
 - Focuses new jobs and housing in areas with transportation choices
 - Promotes equity and housing affordability
 - Promotes salmon recovery and reduces stormwater impacts
 - Contributes to a healthy economy
 - Accelerates regional conservation as a Transfer of Development Rights (TDR) receiving area
 - Contributes to a unique, vibrant and attractive urban center
- Identify infrastructure improvements to support a healthy environment, support sustainability, and ensure a long-term high quality of life for all residents.

2.2 PLANNING CONTEXT

TACOMA COMPREHENSIVE PLAN

The Tacoma Comprehensive Plan is a 20-year plan that provides guidance for how Tacoma will accommodate growth in a way that is consistent with the vision of the residents of the City.

The City implements the plan through development and other regulations, primarily found in the City’s zoning map and land use regulatory code (TMC Title 13).

Consistent with the Washington Growth Management Act (GMA), the City adopted an updated Comprehensive Plan that incorporates updated estimates of employment and population growth through 2040. During this time period, the Tacoma Mall RGC is planned to accommodate at least 8,000 new residents and 7,500 new jobs.

The Comprehensive Plan discusses the Tacoma Mall neighborhood in several places, focusing on its economic development role and transportation services. Policy EC-6.8 in the plan’s Economic Development Element calls for completion of a subarea plan consistent with this proposal. The Plan also provides specific guidance for urban form in the Tacoma Mall RGC, including the following goal and policies:

Goal UF-5 Elevate the Tacoma Mall Regional Growth Center in its role as a regional center of employment, commercial and public services.

Policy UF-5.1 Strive to achieve the Tacoma Mall Regional Growth Center’s regional allocation of employment and population growth and continue its role as a retail destination while expanding economic opportunities and services. The center should have the largest concentration of housing in South Tacoma.

Policy UF-5.2 Enhance both the internal pedestrian connectivity and connectivity to regional transportation facilities to promote cohesion of the center and to optimize access to the shopping and employment opportunities.

Policy UF-5.3 Enhance the public realm to provide a better setting for business and social activity that serves South Tacoma and the region.

EXISTING ZONING

There are four zoning designations within the study area, including two within the RGC, as shown in Figure 2-4 on the following page. 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 RGC is zoned UCX, followed by RCX zoning in the southwest quadrant of the RGC. The portions of the study area not included in the RGC are zoned M-1, with the exception of a small area south of South 47th Street which is zoned NCX. These zoning designations are summarized in Table 2.1.

Table 2.1. Study Area Existing Zoning

Zoning Designation	Summary
UCX Urban Center Mixed-Use	Intended to provide for 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.
RCX Residential/ Commercial Mixed Use	Intended 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.
NCX Neighborhood Mixed Use	Intended 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.
M-1 Light Industrial	This designation allow for a variety of industrial uses that are moderate in scale and impact, with lower noise, odors and traffic generation than heavy industrial uses. This designation may include various types of light manufacturing and warehousing and newer, clean and high-tech industries, along with commercial and some limited residential uses. These areas are often utilized as a buffer or transition between heavy industrial areas and less intensive commercial and/or residential areas.

Source: City of Tacoma

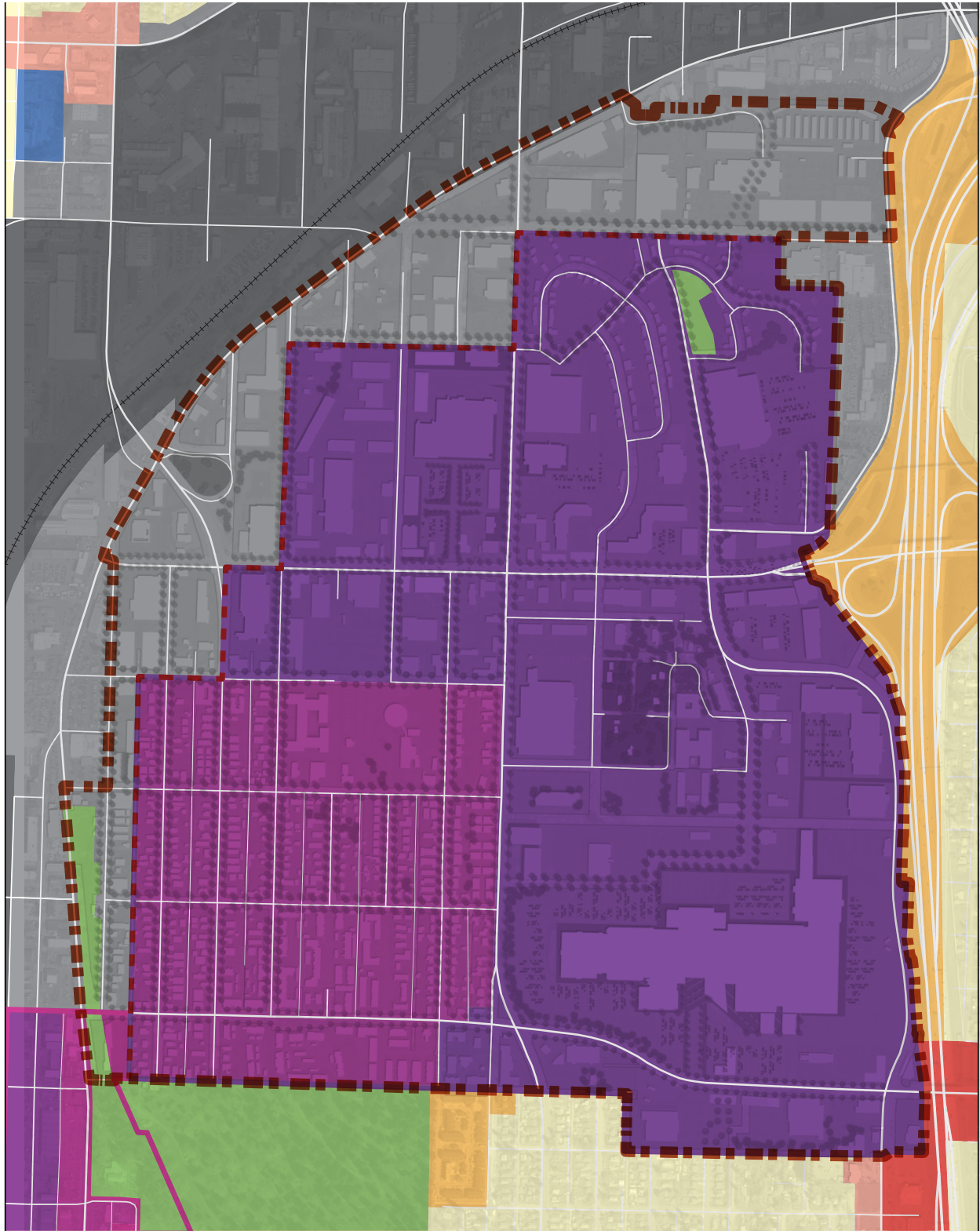


Figure 2.4. Existing zoning classifications

2.3 PUBLIC OUTREACH

The City's public engagement effort is intended to engage with the broad and diverse range of interested parties including area residents, businesses and property owners, community organizations, public entities and agencies, visitors, potential developers or investors, and the broader planning and scientific communities. The City is providing multiple ways in which stakeholders can participate, including online, social media, public workshops and meetings, stakeholder interviews, and focus groups. Notification of meetings and other opportunities for community engagement was provided through neighborhood-wide mailings, email and webpage updates, and sign postings consistent with requirements of RCW 43.21C.420.

A brief summary of the City's public engagement activities to-date is provided in Table 2.2, and additional information can be found at the City's project website: <http://www.tacomamallneighborhood.com/>.

2.4 ENVIRONMENTAL REVIEW PROCESS

The purpose of this EIS is to assist the public and decision-makers in considering the potential environmental effects of the proposed Subarea Plan and implementing regulations.

PROGRAMMATIC REVIEW

SEPA requires government officials to consider the environmental consequences of future actions and to consider consequences of proposed actions, and to consider ways to accomplish the objectives that minimize adverse impacts or enhance environmental quality. They must consider whether the proposed action will have a probable significant adverse environmental impact on the elements of the natural and built environment.

The adoption of a subarea plan and implementing regulations is classified by SEPA as a non-project (also referred to as programmatic) action. A non-project action is defined as an action that is broader than a single site-specific project and involves decisions on policies, plans or programs. An EIS for non-project proposal does not require site-specific analysis; instead the EIS will discuss impacts and alternatives appropriate to the scope of the non-project proposal and to the level of planning for the proposal.

Table 2.2. Public Outreach Summary

Date	Activity
October-December 2017	The City Council is scheduled to hold a public hearing on November 21, 2017, and take final action to adopt the Plan, EIS and appendices on December 5, 2017.
August 2014-October 2017	Planning Commission held a public hearing on September 6, 2017, and forwarded their recommendations to the City Council on October 18, 2017. Prior to that, the Commission discussed the project at ten meetings.
June 2016-June 2017	Regular neighborhood stakeholder group meetings to collaborate on refinements to the draft plan and on implementation strategies
August-October 2016	Focused engagement effort including two large group and 11 small group discussions with commercial property and business owners
March-May 2016	Three neighborhood stakeholder meetings to collaborate on goals, policies and actions reflecting community input and technical analysis to-date
November 2015-March 2016	Meetings with the Bicycle Pedestrian Technical Advisory Group, South Tacoma Neighborhood Council, Transportation Commission, Sustainable Tacoma Commission, Simon Corporation, Tacoma School District, Pierce Transit, Sound Transit, Metro Parks, Community Stakeholder Group, WSDOT, Joint Municipal Action Committee, City Council and Planning Commission to share outreach findings and key issues
October 2015	Second public scoping meeting to comment on issues that should be included in the EIS analysis
September 2015	Four day design workshop to develop and discuss design concepts and scenarios for future development and an Illustrative Vision Plan
September 2015	First public scoping meeting to comment on issues that should be included in the EIS analysis
September 2015	City Bicycle Pedestrian Technical Advisory Group tour to assess current conditions and identify key destinations and potential bicycle routes within and through the neighborhood
September 2015	Planning Commission walking and bus tour
August- September 2015	Ten stakeholder interviews to identify issues and potential risks and to generate ideas for the project
August 2015	General community meeting to introduce the project
July and August 2015	Three focus group meetings conducted by Tacoma Pierce County Health Department in different neighborhood locations to hear what residents and community partners think is needed to create and sustain a livable community
July 2015	Walking tour with the City Council Neighborhoods and Housing Committee

Source: <http://www.tacomamallneighborhood.com/>

The analysis in the EIS may be used in the future to help inform project-level development proposals. For this EIS, the City has elected to follow the non-project process established under RCW 43.21C.420. Recognizing that RCW 43.21C.420 includes a sunset provision, the City wishes to also proceed under RCW 43.21C.031 (planned action) and RCW 43.21C.229 (infill exemption), providing the City with additional SEPA tools that may be used if the provisions in RCW 43.21C.420 expire before the City's vision for the Tacoma Mall neighborhood is achieved. Each SEPA option is briefly summarized below.

OPTIONAL SUBAREA PLAN

As established in RCW 43.21C.420, cities that meet specific criteria may prepare a non-project EIS, assessing and disclosing the probable significant adverse impacts of the optional comprehensive plan element, development regulations and of future development that is consistent with the plan and regulations. The RCW establishes the several requirements for this planning process, listed below.¹

- At least one community meeting must be held on the proposed subarea plan before the scoping notice for the non-project EIS is issued.
- The community meeting notice must include general illustrations and descriptions of buildings generally representative of the maximum building envelope that will be allowed under the proposed plan and indicate that future appeals of proposed developments that are consistent with the plan will be limited. Notice of the community meeting must include signs located on major travel routes in the subarea.
- As an incentive for development authorized under this section, a city shall consider establishing a transfer-of-development-rights program.¹ If the city decides not to establish such a program, the city must state in the record, the reasons for not adopting the program.
- Any person that has standing to appeal the adoption of this subarea plan or implementing regulations also has standing to appeal this non-project EIS.
- Until July 1, 2018, a proposed development that complies with the subarea plan policies and development regulations adopted under these provisions may not be challenged in administrative or juridical appeals for noncompliance with this chapter as long as a complete application for such development is submitted to the city within a time frame established by the

¹ Some requirements are specifically for cities with populations over 500,000. Because Tacoma's population is less than 500,000, these requirements are not included in the summary.

city, but not to exceed ten years from the date of issuance of the Final EIS.

- After July 1, 2018, the immunity from appeals under this chapter of any application that vests or will vest under this process is still valid, provided that the Final EIS on the subarea plan is issued by July 1, 2018.

Consistent with these requirements, the City conducted an initial public meeting on August 26, 2015 and public scoping meetings on September 17 and October 22, 2015. Required information and notice procedures were provided for these meetings.

PLANNED ACTION ORDINANCE

A planned action provides more detailed environmental analysis during the early formulation stages of planning proposals rather than at the project permit review stage. Future development proposals consistent with the planned action ordinance do not have to undergo an environmental threshold determination, and are not subject to SEPA appeals when consistent with the planned action ordinance including specified mitigation measures. Planned actions still need to meet the City's development regulations and to obtain necessary permits.

According to the SEPA law and rules, a planned action is defined as a project that has the following characteristics:

1. Is designated a planned action by ordinance or resolution adopted by a GMA county/city;
2. Has had significant environmental impacts addressed in an EIS, though some analysis can be deferred at the project level pursuant to certain criteria specified in the law;
3. Has been prepared in conjunction with a comprehensive plan, subarea plan, a fully contained community, a master planned resort, master planned development, a phased project, or in conjunction with subsequent/implementing projects;
4. Is located within an urban growth area;
5. Is not an essential public facility, as defined in RCW 12.36.70A.200, unless an essential public facility is accessory to or part of a residential, office, school, commercial, recreational, service, or industrial development that is designated a planned action; and
6. Is consistent with a comprehensive plan or subarea plan adopted under GMA.

In designating a planned action, the jurisdiction must define of the types of development included and has option to limit the boundaries and to establish a time period during which the planned action will be effective. Review of a planned action is intended to be simpler and more focused than for

other projects. If a planned action ordinance is adopted, the City would follow the applicable procedures contained in the ordinance to determine if the proposed project impacts are consistent with the EIS. When a permit application and environmental checklist are submitted for a project that is being proposed as a planned action project, the City must first verify the following:

- The project meets the description of any project(s) designated as a planned action by ordinance or resolution.
- The probable significant adverse environmental impacts were adequately addressed in the EIS.
- The project includes any conditions or mitigation measures outlined in the ordinance or resolution.

If the project meets the above requirements, the project qualifies as a planned action project and a SEPA threshold determination is not required. However, City actions (i.e., the permit process) are still applicable.

RESIDENTIAL MIXED USE/INFILL EXEMPTION

Cities or counties that are subject to GMA can use an EIS prepared for their comprehensive plan or subarea plans to establish an exemption for residential, mixed-use, or commercial (non-retail) projects. Based on SEPA (RCW 43.21C.229) the exemption must be limited to new residential or mixed-use development within a designated urban growth area where the existing "density and intensity of use is lower than called for in the goals and policies of the applicable comprehensive plan." Note that stand-alone retail development would not be covered as part of the exemption and would continue to be reviewed consistent with the City's project-level SEPA procedures.

Because it is an exemption, the agency should be confident, based on sufficient code requirements, that it does not need its SEPA authority to condition the proposal. When used, the exemption can streamline permitting by requiring less information from the project applicant; for example, a SEPA threshold determination would not be required for an exempt development.

The SEPA Handbook (Washington State Department of Ecology 2003) identifies a recommended procedure for establishing a SEPA infill exemption, summarized below:

1. Identify the density and intensity goals specified in the adopted comprehensive plan for residential and mixed-use development.
2. Evaluate recent residential and/or mixed-use projects to identify a specific area(s) where the density/intensity goals in the comprehensive plan are not being met.

3. If review of the recent development indicates the density or intensity goals are not being met, identify the development level needed to meet the goals within the selected area.
4. Evaluate the EIS prepared for the comprehensive plan and determine if the density and intensity goals have been adequately analyzed.
5. Draft a proposed categorical exemption. The exemption should clearly indicate:
 - a. The level of residential or mixed-use development that will be exempt,
 - b. The area where the exemption will apply, and
 - c. How the exemption will be applied to a proposed project.
6. Complete SEPA environmental review for the proposed categorical exemption.
7. Invite the public to comment on the proposed exemption.
8. Amend the agency's SEPA procedures ordinance to include the new categorical exemption. Send a copy of the new exemption(s) to the Department of Ecology.

2.5 PROPOSED ACTION AND ALTERNATIVES

The City is considering an updated subarea plan and implementing regulations that would amend the Tacoma Comprehensive Plan and Land Use Code (Tacoma Municipal Code Title 13) to set the stage for transition to a compact, complete neighborhood, consistent with Vision 2040 and City direction for the study area. The proposal would leverage public and private partnerships and investments to address transportation, infrastructure, environmental, community character and other needs in order to stimulate large-scale population and employment growth. The proposal is based on a comprehensive public stakeholder process as summarized in Section 2.3 of this EIS. The legislative action, if taken, would apply within the existing RGC and could include the proposed expansion area considered in this EIS.

Alternatives addressed in this Draft EIS include No Action—future growth would continue based on existing development regulations—and the Action Alternative—future growth assuming a new vision for the area, updated development standards, transportation system, stormwater infrastructure and other public improvements, and public/private investment.

Key features associated with each alternative are summarized in Table 2.3, and each alternative is described in more detail following the table.

Table 2.3. Alternatives Overview

Features	Alternative 1 <i>No Action</i>	Alternative 2 <i>Action Alternative</i>
New Housing Units	4,040 new housing units by 2040	4,444 new housing units by 2040
Additional Population	8,079 additional persons by 2040	8,887 additional persons by 2040
New Jobs	7,555 new jobs by 2040	8,385 new jobs by 2040
New Commercial Square Footage	2,833,125 sf by 2040	3,144,375 sf by 2040
RGC Area	No change proposed to RGC area	The existing RGC would be expanded by approximately 116 acres to include area located along the north and west boundaries (see Figure 2–2).
Land Use and Zoning	Existing land use and zoning designations would remain unchanged	<p>Alternative 2 includes an updated land use goal, land use designations, zoning classifications, and development standards, including a set of code changes that would be adopted concurrent with the Subarea Plan. Major elements of these amendments include an area-wide rezone that would include new zoning boundaries, height limits and minimum density requirements; new large parcel standards (including new review process and street connectivity requirements); additional pedestrian street designations; and new design standards for tree cover, landscaping, parking lots, drive through facilities and other features.</p> <p>A future code amendment package may include a hybrid traditional/form- based code, measures to support a more modern Northwest design aesthetics, and new standards for supporting district identities.</p>
Transportation Network	Future improvements would continue to occur on an incremental basis as planned by the City’s Transportation Master Plan. The No Action Alternative includes the Tier 1 projects identified in the City’s Transportation Master Plan, projects which are largely within the City’s control. These include the S 38th Street extension, S 48th Street pedestrian overpass, and the Pine Street and Tacoma Mall corridor improvements.	<p>In addition to the Tier 1 projects identified in the City’s Transportation Master Plan, the Alternative 2 street network would be enhanced to increase connectivity, provide greater bicycle and pedestrian mobility, improve access to transit, and improve vehicle traffic flow.</p> <p>The proposal includes 25 new near-, mid- and long-term transportation projects that are proposed for incorporation into the City’s Transportation Master Plan. The projects reflect Subarea Plan policy priorities such as constructing the Loop Road, improved network connectivity, greening streets as part of the area-wide stormwater strategy, locating a high capacity transit station in the subarea, and improving the multi-modal system.</p>

Features	Alternative 1 <i>No Action</i>	Alternative 2 <i>Action Alternative</i>
Stormwater Infrastructure	Stormwater improvements as required by City regulations	Alternative 2 proposes low impact development (LID) stormwater improvements, including increased green space, permeable pavement, bioretention facilities, a regional treatment facility, and amended development standards to promote sustainable stormwater management.
Parks and Open Space	No plan for new or improved parks or open space	Alternative 2 proposes an illustrative concept plan for enhancements to existing and development of new parks and open spaces. The plan supports a coordinated partnership with Metro Parks Tacoma, the City of Tacoma, the Tacoma School District and civic partners to achieve the subarea plan parks vision and recognizes that integration of the vision into the context of citywide system planning efforts is a first step toward future parks actions.

Source: City of Tacoma, 3 Square Blocks

SUBAREA PLAN

As noted previously, the proposed action includes adoption of a subarea plan for the Tacoma Mall neighborhood. The proposed Subarea Plan includes the following elements:

1. Introduction
2. Context
3. Urban Form
4. Land Use
5. Housing
6. Transportation Choices
7. Environment
8. Community Vitality
9. Shared Prosperity
10. Utilities and Services
11. Implementation

The draft Subarea Plan identifies goals and actions for each topic area and specifically addresses the goals of the City’s NEP grant. Public comment is invited on both the draft Subarea Plan and the Draft EIS.

ALTERNATIVE 1: NO ACTION

FUTURE GROWTH AND DEVELOPMENT PATTERNS

Alternative 1 would continue the current Comprehensive Plan land use designations and zoning classifications. Future growth would occur according to existing land use designations, zoning designations and development standards. See Figure 2.4 for existing zoning designations.

As shown in Table 2.3 on the previous pages, Alternative 1 assumes significant growth in both housing and employment through 2040 within the existing 485-acre Regional Growth Center. However, based on historic development trends in this area, there is high likelihood that future development would be limited and would not achieve the City's vision for this area.

Private investment in businesses and housing would likely occur in a scattered and incremental fashion and carry forward the existing auto-centric design, with large paved areas and limited amenities, including pedestrian improvements and parks and open space facilities.

TRANSPORTATION, PARKS, STORMWATER MANAGEMENT

Improvements to the street network, open space and park facilities and stormwater infrastructure would be based on the City's adopted Capital Improvement Plan and other implementing plans and regulations. It is anticipated that the majority of future public improvements would be developed on a limited and incremental basis as development occurs.

SEPA REVIEW

Streamlined SEPA review would not be implemented and each proposed development would be subject to individual environmental review.

ALTERNATIVE 2

FUTURE GROWTH AND DEVELOPMENT PATTERNS

Under Alternative 2, the RGC would be expanded to include approximately 116 acres focused along the west and north boundary of the study area (see Figure 2-2 on page 2-3). This addition recognizes existing land use patterns, transportation improvements and topographic features in this area. A portion of this proposed expansion area overlaps with other designated centers in the City. Consequently, the proposed expansion would result in reduction of the South Tacoma Way Manufacturing and Industrial Center by 82 acres and the South Tacoma Way Neighborhood Center by 2 acres.

Overall, Alternative 2 proposes redevelopment of the study area into an area characterized by a cohesive urban form, a complete street system with pedestrian and bicycle connectivity and improved transit access, and green stormwater infrastructure integrated with new parks and open spaces.

Compared to Alternative 1, a slightly higher level of residential and employment growth is anticipated, (see Table 2.3 on page 2-17) due to the expanded RGC. Growth would be distributed throughout the expanded RGC according to revised land use

designations and zoning classifications as shown in Figure 2.5 and Figure 2.6 on the following pages and briefly described below.

LAND USE DESIGNATIONS

In general, the new designations would carry forward the mixed use character of the study area, but would provide greater guidance for the amount of development density and intensity at different locations in the study area. Specifically, areas with the greatest density and intensity of development would be focused around the existing Tacoma Mall and along South 38th Street, South Pine Street, and Tacoma Mall Boulevard, the major thoroughfares through the neighborhood. Moderate to high densities and intensities would be accommodated in much of the balance of the study area, with the exception of the Southwest Quadrant. In the Southwest Quadrant, the existing residential area would be designated for moderate to low development intensity and density.

DEVELOPMENT REGULATIONS

Alternative 2 would include a series of regulatory amendments to be adopted concurrent with the updated Subarea Plan, identified as Phase I amendments. An overview of proposed code amendments includes the following:

- An area-wide rezone that would include new zoning boundaries, height limits and minimum density requirements:
Zoning reclassifications. Area-wide rezones would correspond to the density and intensity levels established by the newland use designations. Areas with the greatest density and intensity would continue to be zoned Urban Mixed Use (UCX) and would be focused around the existing Tacoma Mall, and along South 38th Street, South Pine Street and Tacoma Mall Boulevard. Small areas in the northeast and southwest corners of the study area currently zoned Light Industrial (M-1), as well as a small area currently zoned NCX in the southwest corner of the study area, would be rezoned UCX at a moderate to high density/intensity level. Portions of the northeast and southwest quadrants would be rezoned from UCX and RCX to Urban Residential Mixed Use (URX), at moderate and low intensity levels, respectively. Property along South Tacoma Way in the southwest, northeast and northwest quadrants of the study area between South 40th Street and South Sprague Avenue that is currently zoned M-1 would be rezoned to Commercial Industrial Mixed Use (CIX) at moderate to high intensities. A small area in the center of the southwest quadrant would be rezoned from RCX to Neighborhood Commercial Mixed Use (NCX). Zoning classifications proposed under Alternative 2 are briefly summarized in Table 2.4.

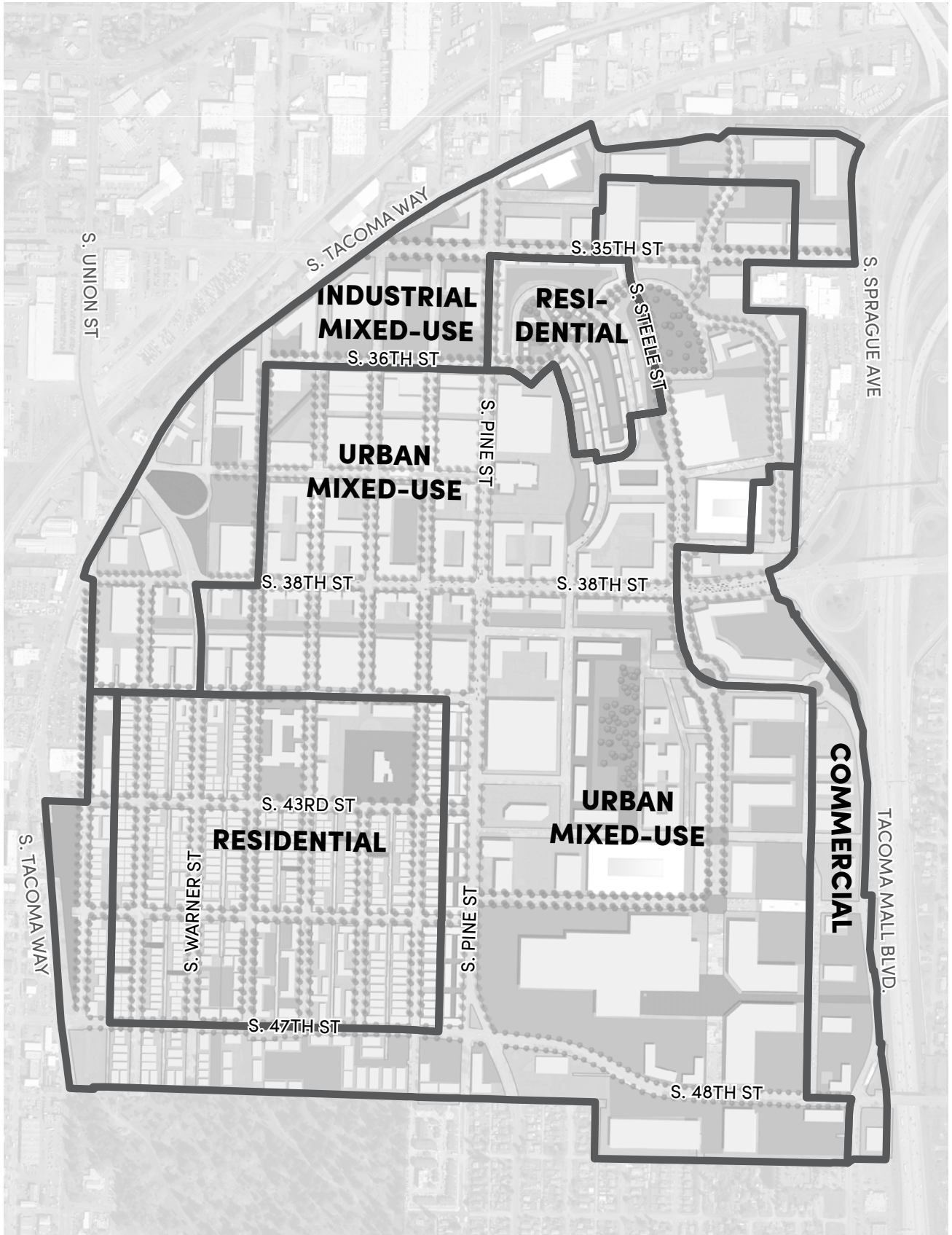


Figure 2.5. Land Use Designations, Alternative 2

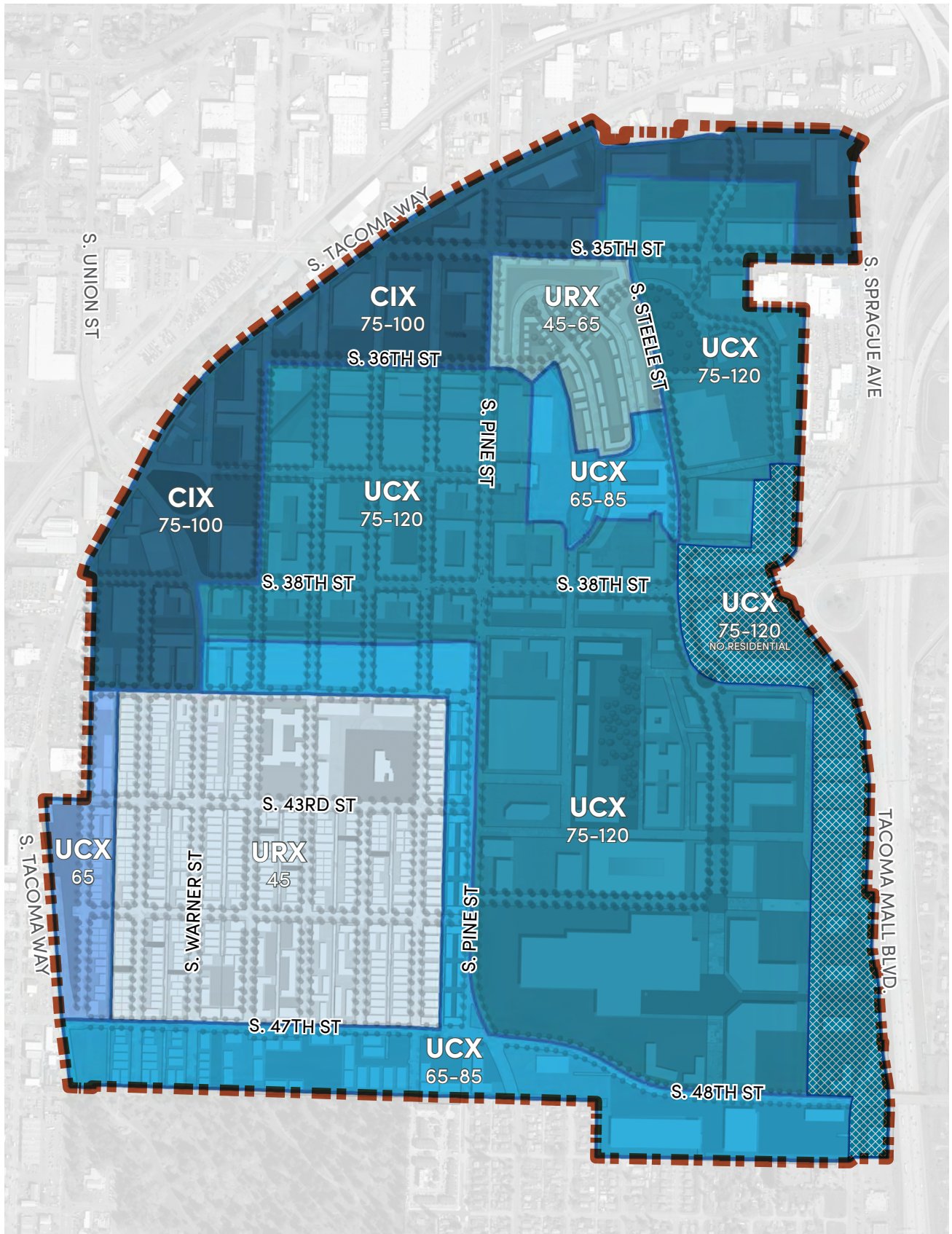


Figure 2.6. Zoning Classifications, Alternative 2

Table 2.4. Proposed Zoning Classifications, Alternative 2

Existing Zoning Districts	Proposed Zoning Districts	General intent of proposed Zoning District
Urban Center Mixed-Use District (UCX)	UCX Core—75/120 feet height UCX Transition—65/85 feet height UCX Commercial (no residential uses)	Provides for dense residential, commercial and institutional development including regional destinations that supports walking and transit-usage.
Residential Mixed-Use District (RCX)	Urban Residential Mixed-Use (URX)	Provides for dense housing development in walkable proximity to commercial mixed-use zones.
Neighborhood Commercial Mixed-Use District (NCX)	UCX Transition—65/85 feet height	Provides for dense mixed-use development at a mid-rise height, serves as a transition between higher and lower height areas.
Light Industrial District (M-1)	Commercial Industrial Mixed-Use (CIX)	Provides for a mix of commercial, residential and light manufacturing, assembly, distribution and goods storage.

Source: City of Tacoma

Building Heights. Proposed building height limits would correspond to zoning classifications and land use designations. In the area of greatest density and intensity, maximum base building heights would range from 65–75 feet, with a height bonus option to a maximum of 120 feet. Lowest building height limits are located in the Southwest Quadrant, with a 45 foot height limit in the URX zone and in the NCX zone. In moderate to high density/intensity areas, base building heights range between 45–65 feet, with maximum heights ranging between 65–75 feet.

Base building heights represent the maximum height that is permitted outright. Additional bonus height, up to the maximum indicated for each zone, may be added if the development proposes incorporation of residential into a mixed use project or the use of Transfer of Development Rights (TDR). See Figure 2–6 on page 2-22 for proposed building height limits. Under Alternative 2, amenities to achieve bonus heights may incorporate bonus standards as currently defined in TMC 13.06.300.E X District Height

Bonus Program, or may identify new standards tailored for the Tacoma Mall neighborhood.

- New large-parcel standards, including new review procedures and street connectivity requirements in specific geographic areas;

- Additional pedestrian street designations (which are associated with certain design requirements in existing code);
- New design standards for tree cover, landscaping, parking lots, driveways, drive-throughs, and trash container placement (townhomes and multifamily uses only); and
- Minor revisions to the South Tacoma Groundwater Protection District regulations.

Phase I will also include policy guidance for development of future building design guidelines.

Additional planned future code amendments, identified as Phase II code amendments, include:

- A new hybrid traditional/form-based code for the subarea
- New bulk and materials standards that support a more modern, contemporary Northwest design aesthetic; and
- New standards to support district identities, including building height, scale and transition areas.

LOOP ROAD/LINEAR PARK

A major organizing element of the Subarea Plan is to establish a loop road/linear park system through the study area (Figure 2.7). This internal road would be approximately 2.3 miles long and would provide for walking, bicycling, slow vehicular traffic, stormwater infrastructure, greenery and tree canopy, and internal connections between parks or other community facilities and the neighborhood quadrants.

CHARACTER DISTRICTS

In addition, each of the four quadrants would be planned for a unique urban character and form, summarized below.

Northwest District. The NW District would transition from an area with dispersed heavy commercial and light industrial activity to focus on mixed use, including residential, artisan fabrication and production activity. Mixed use buildings, live/work, apartment buildings, urban flats, warehouses, and industrial buildings will be connected by comfortable walking streets, distinct public spaces and connections to the Water Flume Trail.

Lincoln Heights District (Northeast Quadrant). This District would provide a mix of retail, commercial and would also include a residential core anchored around Lincoln Heights Park. In the residential core, apartment buildings, courtyard developments, urban flats and townhouses would be located along connecting curvilinear residential streets that are oriented to topography, views, local parks and public places.

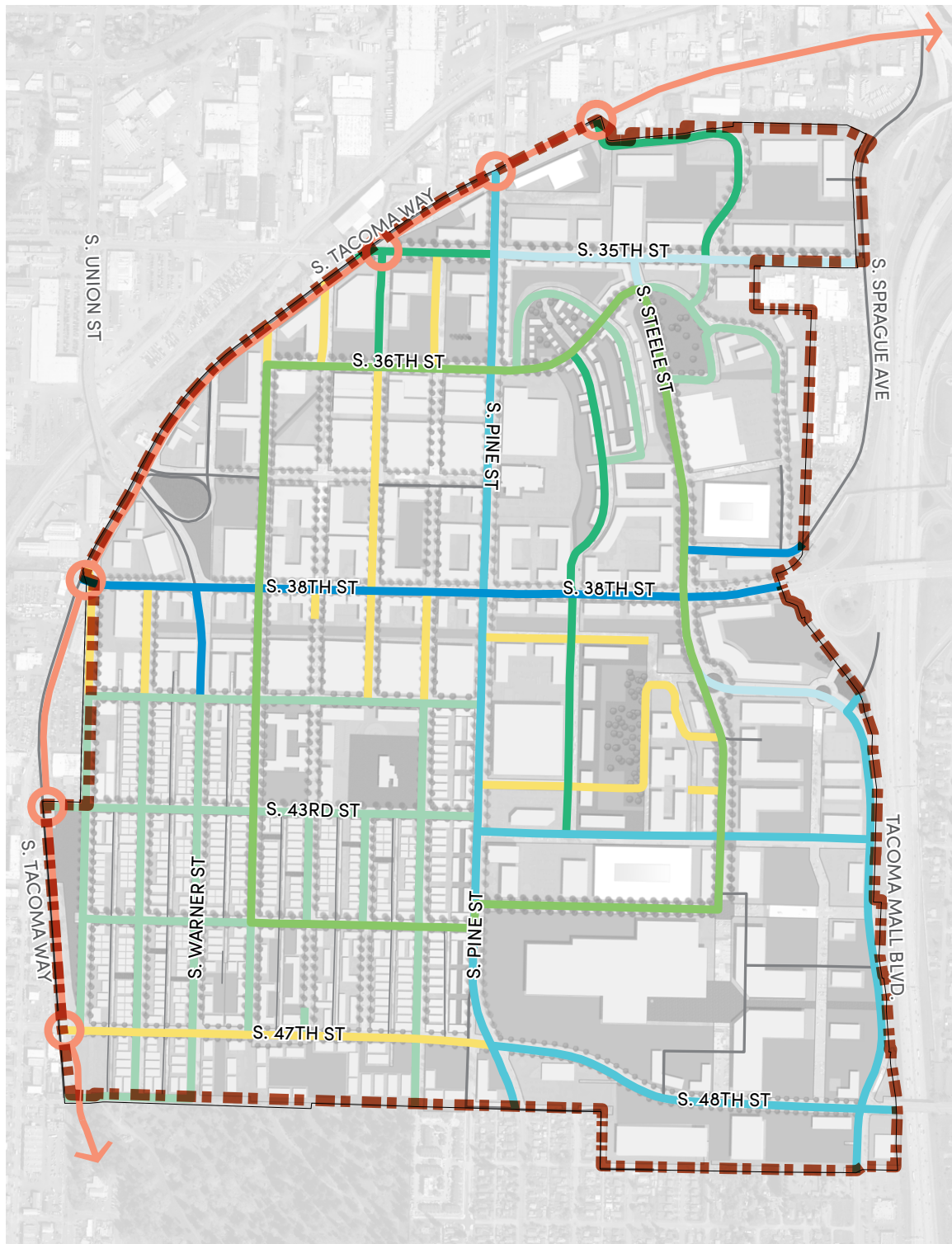


Figure 2.7. Street network and Loop Road concept, Alternative 2

The **mode split** describes the percentage of travelers using a particular type of transportation.

Mall District (Southeast Quadrant). The Mall District is envisioned for the most dense urban infill and would be the activity and services center for the Tacoma Mall neighborhood. With the Tacoma Mall as its anchor, this District would serve regional shoppers and provide residential development, employment, and retail services complemented by educational, medical, civic and community services. Entertainment and cultural venues would attract local and regional visitors.

Madison District (Southwest Quadrant). The heart of the Madison District would be a mixed-scale residential neighborhood characterized by local streets and alleys bordered by houses, duplexes, townhouses and apartments. The former Madison School complex at its center would serve as a large public anchor that provides multiple community uses and purposes including open space, play space and a community garden. The district's edges would include a mix of uses that provide services and amenities for residents as well as transitions to adjacent areas.

TRANSPORTATION

The proposed transportation system would build from the City's adopted Transportation Master Plan and Complete Streets design guidelines, tailored to add specific improvements to support the vision for the Tacoma Mall neighborhood and to provide equity in transportation facilities to serve the neighborhood (Figure 2.7). The proposal plans for transportation improvements that would be provided at a rate equal or ahead of the pace of development during the planning horizon.

Key transportation features include:

- Significantly improved area-wide street connectivity, including improvement projects to subarea access points and primary street corridors and a new Loop Road to facilitate internal trips and new local street connections
- Improved area-wide bicycle and pedestrian connectivity
- Designate the majority of streets in the Subarea as Complete Streets based on the City's Complete Streets Standards
- Development of a loop road that enhances internal connectivity and links the four neighborhood districts
- Planning for potential rail and high capacity transit investments
- Enact a parking demand management strategy that includes deploying the City's residential parking zones program to prioritize curb space for residents
- Vacation of a limited number of public rights-of-way to remove system redundancy or isolated street segments as connectivity and intersection density increases
- Planning for an I-5 direct access ramp onto Tacoma Mall Boulevard for southbound vehicles

The proposed street network would accommodate future growth through a more traditional small-block street system, a safe and comfortable pedestrian environment, and investment in alternative transportation choices that promote active living. By 2040, the plan seeks to achieve a mode split of 52 percent single occupant vehicles, 9 percent high occupancy vehicles (carpools), 12 percent walking/bicycle, 9 percent transit use and 18 percent internal vehicle trips.

The proposal specifically includes 25 new near-, mid- and long-term transportation projects that are proposed for incorporation into the City's Transportation Master Plan. The projects reflect proposed Subarea Plan policy priorities such as constructing the Loop Road, greening streets as part of the area-wide stormwater strategy, locating a high capacity transit station in the subarea, and improving the multi-modal transportation system. The seven near-term, and highest priority, proposed projects are:

- Loop Road Phase I Demonstration Project
- I-5 Direct Access/Potential HOV Ramp Study
- Madison District Green Streets/Stormwater Infrastructure Improvements—Phase I
- South 38th Street and South Steele Street intersection
- South Sprague Avenue Bicycle connection
- Tacoma Mall Transit Center Location Study
- Address area-wide sidewalk gaps

PARKS AND OPEN SPACE

The subarea plan describes the community vision for an integrated system of parks, open space, green infrastructure and public streets including the Loop Road. The plan supports a coordinated partnership with Metro Parks Tacoma, the City of Tacoma, the Tacoma School District and civic partners to achieve the vision and recognizes that integration of the subarea plan parks vision into the context of citywide system planning efforts is a first step toward action. Within this context, key proposed parks and open space features include:

- An emphasis on collaboration and coordination with Metro Parks Tacoma and other parks partners to consider recommended parks actions in the subarea plan
- An illustrative concept plan identifying new and enhanced parks and open spaces, as shown in Figure 2.8
- Suggested level of service standards and parks planning principals
- A recommendation for discussions with parks partners to review and update level of service standards for urban parks and parks planning principals as a first step before making decisions about new parks

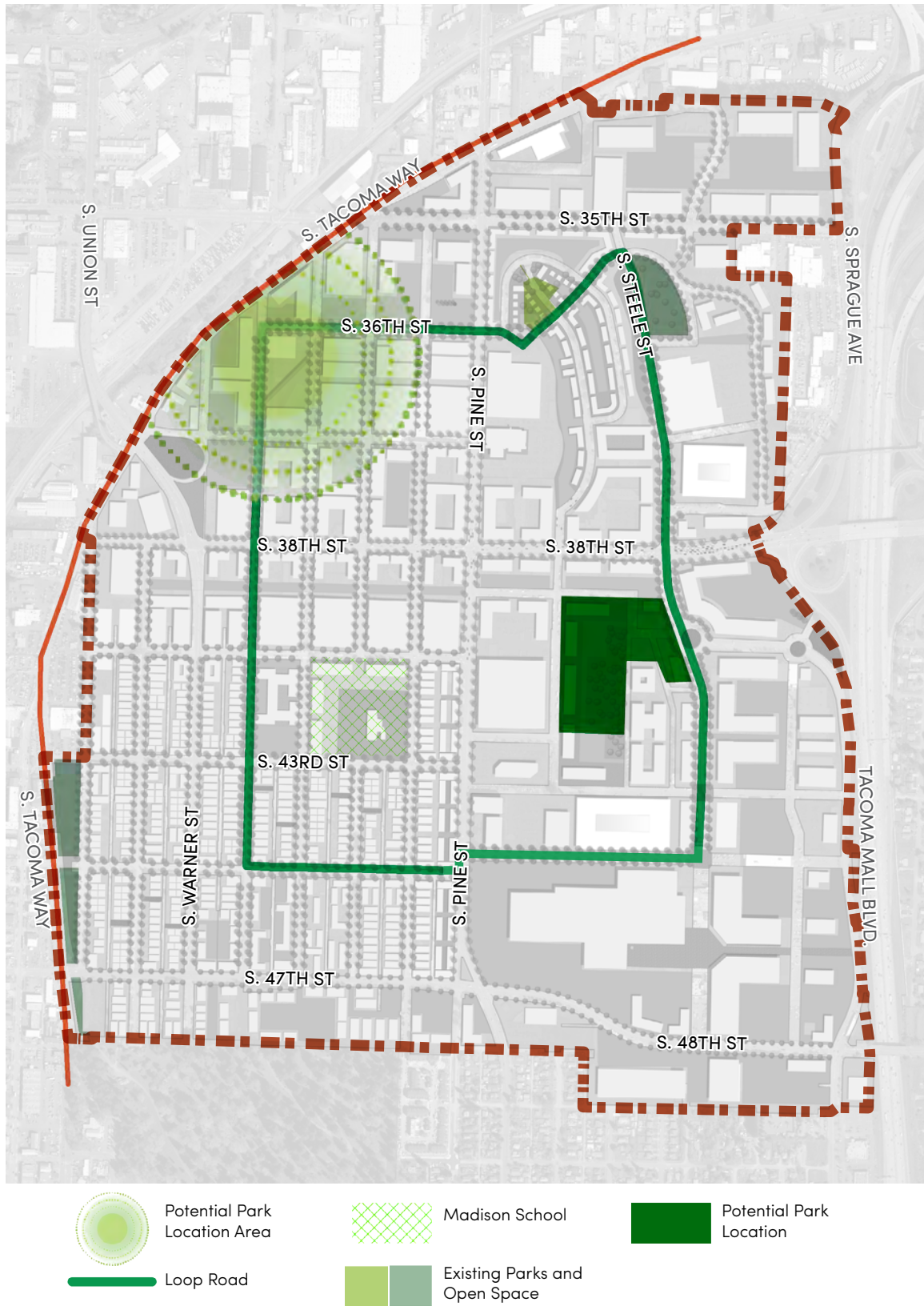


Figure 2.8. Park Improvements, Alternative 2

- Coordination with the Tacoma School District about the potential use of the Madison School site for parks or other public uses
- Exploration of options for relocating the 40th Street Community Garden out of the right-of-way in order to reconnect the street grid at this location
- Work with private developers to provide parks and open spaces
- Engaging with the community to create recreational opportunities for all

Best Management Practices consist of activities, systems, prohibitions of practices, and maintenance procedures that are implemented to prevent or reduce water pollution, erosion and flooding.

STORMWATER MANAGEMENT

Alternative 2 would seek to enhance water quality and water quantity conditions through implementation of an areawide stormwater strategy and Best Management Practices (BMPs) that infiltrate runoff, provide flood storage, and reduce effective impervious surface coverage. Proposed stormwater strategies are shown in Figure 2.9 and include:

- Development of at least one regional water quality, infiltration and/or flood storage facility in the northwest quadrant (which is an area with high soil permeability). It is anticipated that these facilities would be designed in tandem with new flood overflow pathways. These overflow pathways would be designed to convey peak storm event flood flows to specific areas along South Tacoma Way to the north, reducing localized flooding impacts to development and other infrastructure.
- Incorporation of permeable pavement and bioretention cell bulb-outs in street improvement projects for streets with lower traffic volumes, including every street in the Madison District (which is an area with high soil permeability) as well as streets in the center of the Lincoln Heights District and more limited improvements in the Mall District based on soil permeability conditions. These improvements would improve water quality and reduce runoff in areas where existing stormwater infrastructure is overcapacity. The transportation project list in the Subarea Plan supports the areawide stormwater strategy by including green streets projects in the Madison and Lincoln Heights Districts.
- Retention and development of green space and tree canopy to maximize infiltration and reduce impervious runoff. Phase 1 code amendments support this with increased requirements for tree plantings and landscaping.

Bioretention cells are landscape elements designed to intercept, detain, filter and infiltrate stormwater. They are generally facilities located at the edge of a road or parking area. They may be also located in widened landscape areas between the sidewalk and curb, referred to as bioretention cell bulb-outs.



Figure 2.9. Stormwater Improvements, Alternative 2

SEPA REVIEW

A streamlined SEPA review process for development proposals that are consistent with the new Subarea Plan and analysis in this EIS would provide greater efficiency and certainty for new development and increased potential to achieve the vision for compact complete Tacoma Mall community.

2.6 BENEFITS AND DISADVANTAGES OF DEFERRING IMPLEMENTATION

Deferring implementation of the proposal would allow for residential and commercial development to continue to occur as established by existing land use and zoning designations. In the absence of a catalyst for redevelopment and neighborhood revitalization, there is increased risk that development would occur gradually and adopted housing and employment targets may not be met. In addition, there is increased likelihood that, over time, key transportation intersections would begin to fall below adopted levels-of-service, which could result in a reduced potential for new development and growth. Deferring implementation of the proposal would also mean that pedestrian and bicycle improvements would be less likely to be developed. Consequently, there would be fewer opportunities for active transportation and related health benefits.

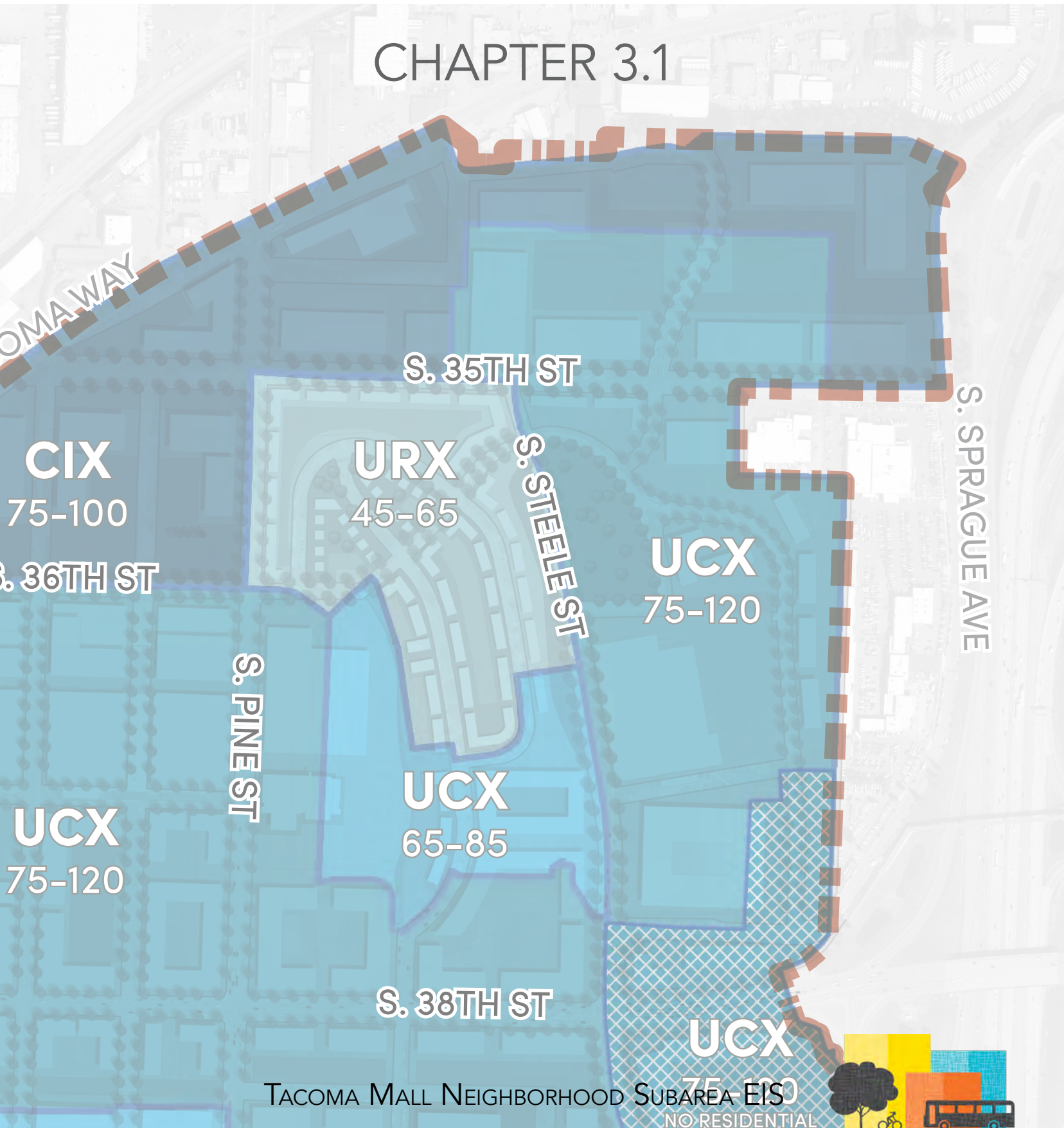
Benefits of new housing, employment, and civic uses—such as opportunities for improving physical, social and mental health and well-being, building social capital and a sense of community, healthy active lifestyles, and greater local employment—in the study area would occur more slowly.

City models show that current stormwater systems do not provide sufficient capacity to meet the City's level of service standards. Stormwater improvements would likely be made as development occurs and as funding is available. Compared to the proposed approach, it is likely that this would not achieve comparable net improvements in utility service and water quality.

Each development would undergo separate environmental review, which would allow public comment on each individual development proposal, but would also lengthen permit review time.

LAND

CHAPTER 3.1



LAND

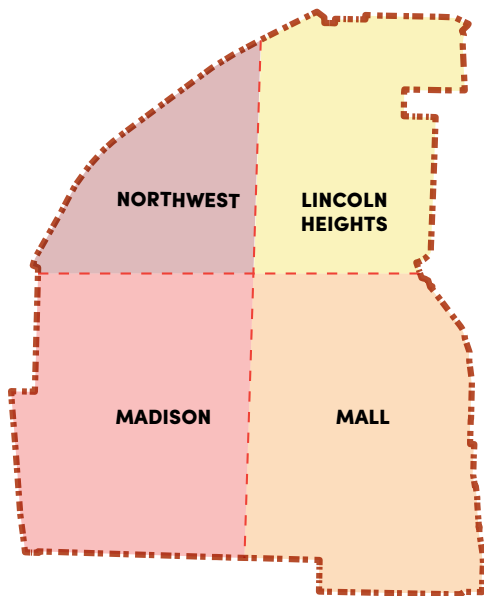


Figure 3.1.1. Study Area districts

3.1.1 EXISTING CONDITIONS

LAND USES

Existing land use patterns in the study area are shown in Figure 3.1.2 and are shaped by the Tacoma Mall's role as a regional retail destination and the S. Tacoma Way corridor's industrial character. Retail is a primary land uses and includes small- and large-format retailers. Retailers are primarily located near the Tacoma Mall and major roads such as S. 38th and S. Steele Sts. Office and industrial uses, including warehousing and manufacturing, are interspersed with retail. The proportion of land used for industrial purposes in the study area, located near S. Tacoma Way, is significantly higher than the proportion found in the Regional Growth Center (RGC) overall. In general, retail, office and industrial buildings are low-rise and on large lots with surface parking.

Residential uses make up the majority of the Madison District and include a mix of single-family detached dwellings, single-family attached units (duplexes/triplexes/townhomes) and apartment buildings. The Mall District includes apartment buildings north of the mall as well as a few single-family uses. The Lincoln Heights District includes single-family detached and attached homes in the residential neighborhood north of Costco and off S. 37th St. The Northwest District includes a small number of single-family residential uses.

The two established residential neighborhoods in the study area are Madison and Lincoln Heights. The Madison residential neighborhood covers most of the Madison District in an area roughly bounded by S. 40th St., S. Junett St., S. 47th St. and S. Puget Sound Avenue. The Lincoln Heights residential neighborhood is in the central-northwest area of the Lincoln Heights District and includes homes along S. California Avenue, Nevada Avenue, S. Arizona Avenue and the northern portion of S. Oregon Avenue.

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 (within the study area

but not the RGC), Tacoma Public Schools facilities that provide specialized programming and bus storage at the Madison School site, and US Postal Service general mail and distribution facilities. Vacant lands are distributed throughout the study area. Parks are located in the Lincoln Heights and Madison Districts. The Lincoln Heights District includes Lincoln Heights Park. The Madison District includes a community garden located at the Madison School site and the northernmost part of South Park (within the study area but not the RGC). Other community and public uses include utility facilities, transit facilities and churches.

Table 3.1-1 shows existing land uses in the study area and RGC. The most common uses in both areas are commercial followed by multifamily residential. Both areas generally have the same mix of existing uses except industrial—the percentage of industrial land in the study area is roughly five times that of the RGC overall.

Table 3.1.1. Existing Land Uses

Land Use	Alt. 1 (Ac)	% of Total	Alt. 2 (Ac)	% of Total
Commercial	228	47%	255	42%
Multifamily Residential	74	15%	76	13%
Government/Education	33	7%	44	7%
Single-Family Residential	30	6%	32	5%
Industrial	5	1%	33	5%
Vacant/Developable	15	3%	18	3%
Parks	3	1%	6	1%
Other Uses	17	4%	21	3%
Areas Outside of Tax Parcels (inc. rights-of-way)	81	17%	117	19%
Total Acres	485	—	601	—

Note: Totals may not sum to 100% or the total of individual line items due to rounding.

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

SURROUNDING LAND USES

Uses surrounding the study area and RGC are similar. The study area’s northern border is within the City’s designated South Tacoma Manufacturing/Industrial Center, and the RGC’s northern border is adjacent. Uses in this area of the South Tacoma Manufacturing/Industrial Center include industrial, retail, office, public and institutional uses, transportation and vacant land. This land use mix continues on the study area and RGC’s western side, along with some residential uses adjacent to the RGC’s western border. Heavy industrial and commercial uses are closer to the study area border than to the RGC border. One reason

The Nalley Valley, northwest of the study area, is a major Tacoma industrial area. It was named after the Nalley pickle factory, and the name has remained over time.

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. An active rail line runs through the Nalley Valley and adds to the industrial character of the area as well as providing 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. The northern portion of South Park is in the study area's southwest corner just outside the RGC and continues to the south. The Tacoma Mall Cemetery and Oakwood Hill Cemetery are just east of South Park. Land uses between the cemeteries and the study area's southeast corner are primarily single-family residential. Exceptions include low-rise apartment uses at the northeast corner of the Tacoma Cemetery and a few retail and office uses concentrated along Tacoma Mall Boulevard. The majority of the study area's eastern border and RGC is adjacent to Interstate 5 (I-5). A small area between the northeast border and I-5 is characterized by a mix of retail and utility uses including automobile dealerships and a telecommunications-switching center.

ZONING

The study area has four zoning designations while the RGC has two, as shown in Figure 3.1.2. These include Urban Center Mixed-Use (UCX), Neighborhood Mixed-Use (NCX), Residential Commercial Mixed-Use (RCX) and Light Industrial (M-1). The majority of the study area is zoned UCX, and all districts include this zoning designation. The portions of the study area not included in the RGC in the Madison, Northwest and Lincoln Heights Districts are zoned M-1 with the exception of a small area south of S. 47th St. zoned NCX. The remainder of the area, including most of the Madison District, is zoned RCX.

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 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).

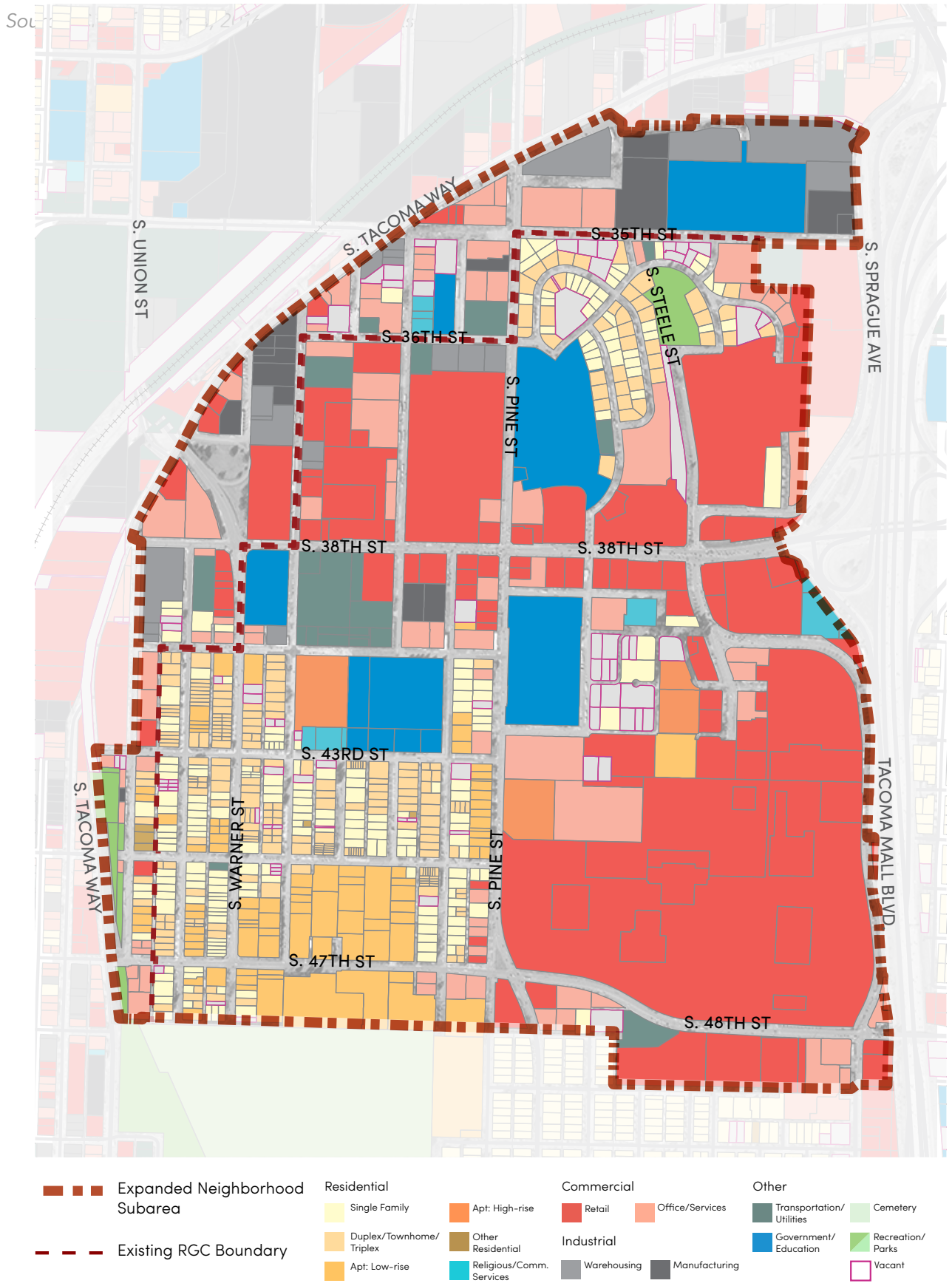


Figure 3.1.2. Existing land uses

UCX ZONE

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.

A wide range of uses are allowed in the UCX zone including single-family detached and attached, multifamily, group homes, accessory dwelling units, retail, entertainment, office, business services, craft production, child care, public facilities, and religious assembly facilities. Industrial uses are not allowed, including light industrial, warehousing and wholesale distribution.

The maximum height of structures in the UCX zone is 75 feet, or up to 120 feet when developers make use of the City's X-District Height Bonus Program and design buildings to include features such as 25% residential floor area or use Transfer of Development Rights (TDR) credits. 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 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).

NCX ZONE

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.

All uses allowed in the UCX zone are also allowed in the NCX zone except for building services and materials, fueling stations and self-storage. Outdoor vehicle sales, storage and repair are also prohibited, though these uses are permitted within buildings. Industrial uses are not allowed.

The maximum height of structures in the NCX zone is 45 feet. Through the X-District Height Bonus Program, maximum heights of 65 feet or 85 feet may be allowed in certain areas, including the adjacent South 56th and South 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. The study area's NCX zone has one designated pedestrian street, South Tacoma Way (Tacoma Municipal Code 13.06.300).

RCX ZONE

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.

Allowable uses in the RCX zone are more limited than those in the UCX and NCX zones. The same residential uses are allowed but fewer other types of uses are permitted. Allowed nonresidential uses include office, retail, craft production, personal services, home occupations, public facilities and religious assembly. The following nonresidential uses are allowed in UCX and NCX zones but not permitted in the RCX zone: cultural institutions, drive-throughs, animal sales and service, business support services, commercial parking,

entertainment, funeral homes, hotels, marijuana retailers, nurseries, repair services, and vehicle retail and sales.

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. The study area's RCX zone has one designated pedestrian street, the S. 47th/48th Transition Street running east to west near the study area's southern border (Tacoma Municipal Code 13.06.300).

M-1 ZONE

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.

Permitted uses in the M-1 zone are light industrial and a limited range of other uses including entertainment, business services, commercial parking, childcare, drive-throughs, eating and drinking establishments, small-scale retail and office, and vehicle services. Certain public facilities are permitted; schools are not allowed in M-1 zones within the South Tacoma Manufacturing/Industrial Center zoning overlay. Mixed-use multifamily housing is allowed in the M-1 zone; the only type permitted in M-1 zones within the South Tacoma Manufacturing/Industrial Center zoning overlay is workers' housing. Heavy industrial uses are not permitted in the M-1 zone.

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).

SURROUNDING ZONING

The area surrounding the study area has a range of zoning designations. In general, the majority of land north and west of the study area is zoned industrial, and the majority of land south and east is zoned residential with some

limited commercial zoning. The specific zoning designations surrounding the study area and RGC are described below.

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

Surrounding zones 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 land south of the study area and RGC is zoned Single-family Dwelling (R-2); however, a few parcels to the southeast 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 there 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 3.1.3). The City updated the Future Land Use Map in 2015 when it updated its Comprehensive Plan. 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 future land use designation (City of Tacoma Planning and Development Services, 2015).

The study area has four future land use designations and the RGC has two, including the Tacoma Mall RGC, Neighborhood Mixed-Use Center, Light Industrial, and Parks and Open Space. The Tacoma Mall RGC designation corresponds with the RGC boundary. The RGC also includes a Parks and Open Space designation that corresponds with Lincoln Heights Park. The study area's southwest corner (outside the RGC) contains lands

designated Parks and Open Space that correspond with South Park, and includes a small area designated Neighborhood Mixed-Use Center inside 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 RGC 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 located around S. Tacoma Way and S. 56th St. and includes the Sounder South Tacoma Station. The South Tacoma Way Manufacturing Industrial Center (MIC) designation includes the study area expansion area and adjoins the RGC to the north and west. In this area, the South Tacoma Way MIC is also designated as Light Industrial, which allows for a variety of uses that have moderate scale and impact compared with 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.

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, Multifamily (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.

POPULATION AND EMPLOYMENT

The study area currently comprises 3,788 people and 8,290 jobs (3 Square Blocks, 2016). Comparatively, the RGC currently has 3,761 people and 7,171 jobs (PSRC, 2014). The small difference in population and larger difference in jobs between the RGC and the study area is due to the predominantly industrial and commercial land uses in the proposed expansion area.

Compared with the City as a whole, the population of the study area tends to have a greater representation of 20–29 and <5 age cohorts, adults without a college education, and households with lower incomes. Additionally, rates of poverty are higher than for the City as a whole (CAI, 2016). The population’s racial diversity is similar to that of the city overall,

except that it has twice as many people of Hispanic origin, slightly more people who are African American or who identify with two or more races, and half as many people who are Asian alone (Tacoma-Pierce County Health Department, 2016).

Employment in the study area is dominated by retail trade, which makes up over 40% of total employment. Accommodation and food services, as well as government services, are also key sectors for employment in the neighborhood. Services and manufacturing are less represented (CAI, 2016).

Local employment needs are generally not met by residents. About 3% of the local population is employed within the study area. Employees that work in the area are drawn from communities across the region (CAI, 2016).

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 existing development capacity in the RGC. The report estimates that the RGC has the capacity to accommodate an additional 49,862 people and 44,760 jobs. This estimate is based on many factors including existing zoning designations, a definition of developable parcels and a set of assumptions about household size, unit size, lot coverage and square feet of floor space per employee (Pierce County, 2014). The report does not provide an estimate of development capacity for the portion of the study area outside the RGC. It does provide general information suggesting that this area has employment development capacity but little residential development capacity, consistent with zoning and land use patterns.

The Buildable Lands Program maintains an inventory of vacant and underutilized land in Pierce County. Based on that inventory, approximately 55% of parcels in both the study area and the RGC are vacant or underutilized. Figure 3.1.4 shows the locations of these parcels.

3.1.2 SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

Under both alternatives, zoning regulations would provide sufficient development capacity to meet 2040 growth targets

ALTERNATIVE 1 (NO ACTION) AND ALTERNATIVE 2 (ACTION ALTERNATIVE)

Alternative 1 (No Action) would maintain the existing RGC boundaries and growth targets as well as the City's current development regulations for the subarea. Alternative 2 (Action Alternative) proposes to expand the RGC boundaries, increase growth targets for the subarea to account for this expansion, and adopt and implement the Tacoma Mall Neighborhood Subarea Plan including changes to zoning and development regulations.

and allow for intensive land use and building patterns to support City and regional planning goals for regional centers. The likelihood of this level of development occurring varies between alternatives.

As discussed under Existing Conditions, development capacity in the existing RGC is sufficient to accommodate growth targets under Alternative 1. Alternative 2 proposes an expansion of the RGC and changes to the City's zoning regulations for the study area. To understand how these changes would impact future growth, the City generated an estimate of the development capacity under Alternative 2 using the same methodology used for the 2014 Pierce County Buildable Lands Report. Based on this estimate, future capacity would accommodate an additional 46,304 people and 63,761 jobs.

Under both alternatives, the study area is assumed to experience new growth and development that will result in a greater mix of uses and building intensities than under existing conditions. These types of impacts have the potential to cause corresponding land use compatibility impacts. Specific impacts to the existing land use pattern vary between alternatives.

Under both alternatives, short-term development would likely occur on the vacant or underutilized lands shown in Figure 3.1.4. Sites not shown in Figure 3.1.4 could also redevelop.

IMPACTS OF ALTERNATIVE 1 (NO ACTION)

Alternative 1 assumes significant development will occur within current RGC boundaries consistent with existing land use and zoning regulations. Development would occur on a project-by-project basis and land use impacts would be evaluated on a site-specific basis in conjunction with each proposed project.

LAND USE PATTERNS AND GROWTH DISTRIBUTION

Development Intensity

Existing land use regulations allow for high development intensities throughout the RGC. As discussed in Existing Conditions, building heights are currently allowed in the RGC of up to 60–120 feet. Past and current development trends for the RGC are for much lower intensities than allowed under current zoning. Most existing buildings in the RGC are under four stories. The gap between allowed land use patterns and development trends creates uncertainty about the intensity of future development patterns. It is possible that development under the No Action would not achieve the 2040 growth targets and city and regional goals for the Tacoma Mall RGC.

Mix of Land Uses

Existing land use regulations allow for a mix of housing- and job-supporting land uses throughout the RGC. As discussed in Existing Conditions, two zoning districts will guide future use and intensity in the RGC under Alternative 1. The UCX zone corresponds to the Northwest, Lincoln Heights and Mall Districts, and the RCX zone corresponds to the Madison District, excepting the north portion and southeast corner of the Madison District that is zoned UCX. Housing and employment growth are permitted in both zones. Based on the range of allowable uses in each zone, the majority of employment growth would likely occur in the UCX zone and there would likely be a higher proportion of residential uses in the RCX zone.

Northwest, Lincoln Heights and Mall Districts. The UCX zone permits a wide range of uses as discussed in Existing Conditions. Infill and redevelopment in this zone could result in a greater mix of uses than currently exist, as well as intensification of development. One area with potential for a significant increase in mix of uses is the Northwest District. This area is currently predominantly commercial and infill development could result in the introduction of residential and other uses.

Another area with the potential for change in mix of land uses is the Lincoln Heights residential neighborhood in the Lincoln Heights District. The neighborhood has been partially redeveloped with commercial and public uses in the past. While there has been no recent redevelopment in the neighborhood, given the wide range of uses allowed in the UCX zone there is the potential that the remaining single-family and single-family attached uses could continue to be replaced by other types of land uses.

The Mall District is unlikely to experience significant changes in mix of land uses. The Tacoma Mall is within this district and is an anchor for surrounding retail uses. Also, the district already has a mix of retail, office, residential and other uses.

Madison District. The types of infill and redevelopment that could occur in the RCX zone are limited in comparison with those in the UCX and include residential uses and neighborhood-scale commercial uses. The area of the Madison District zoned RCX contains the Madison residential neighborhood that has been transitioning from a land use pattern typical of single-family neighborhoods build in the early 1900s to a mix of residential uses with higher densities. Existing land use regulations allow

for continued intensification of residential uses as well as incorporation of neighborhood-scale commercial uses.

COMPATIBILITY OF USES

There is the potential for land use compatibility issues when land use patterns change. If future developments take advantage of allowed building heights and scales in the RGC, there may be abrupt transitions as they infill around existing smaller buildings. Due to the uncertainty about future development patterns under Alternative 1, it is unclear whether such abrupt transitions would continue to exist for a long period or building heights and scales would become more consistent in a shorter time.

An increased mix of uses is possible throughout the RGC under Alternative 1; however, the uses allowed in the UCX and RCX zones are designed to be compatible and support the Tacoma Mall RGC generalized future land use designation. If future development results in an increased mix of uses in the RGC, residents, visitors and business owners may experience short-term impacts as they adjust to new local conditions, but no long-term significant conflicts between land uses are expected. Development under Alternative 1 is expected to occur incrementally over time, which would help prevent sudden occurrences of major changes to the mix of land uses. In addition, the City's existing development standards, including building character, noise, light and glare standards, would mitigate potential impacts (see Section 3.4—Aesthetics and Urban Design).

Adjacent to the RGC

There is little potential for land use conflicts adjacent to the RGC. To the west and north, light industrial zoning provides a transition between the RGC and higher-intensity industrial uses. To the east, the strong boundary provided by I-5 minimizes the potential for land use conflicts with development in adjacent areas. To the south, the Mall District is adjacent to a residential neighborhood. A change in topography and a lack of street connectivity create a buffer between the Mall District and the residential neighborhood. The Madison District is adjacent to a cemetery. The residential character of the Madison District is compatible with the character of the cemetery. Furthermore, lack of street connectivity between the two creates a buffer.

IMPACTS OF ALTERNATIVE 2

Alternative 2 assumes significant development in the study area under a new future land use plan and the suggested

zoning designations shown in Figures 2.5 and 2.6 (Chapter 2). These are intended to support a cohesive urban form by focusing highest-intensity uses to create an urban core for the neighborhood and creating transitions between different types and intensities of land uses. Development would occur incrementally over time and be subject to area-wide environmental review standards.

LAND USE PATTERNS AND GROWTH DISTRIBUTION

Development Intensity

Based on the zoning classifications proposed by Alternative 2, the highest-intensity development and tallest buildings would occur around the Tacoma Mall and along portions of S. 38th St., S. Pine St. and Tacoma Mall Boulevard, which are major transportation corridors in the study area. Maximum building heights in those areas would range from 75 to 120 feet. Moderate- to low-intensity development would occur in the Madison residential neighborhood. The maximum building height in that area would be 45 feet. Moderate- to high-intensity development would occur throughout the remainder of the study area. Building heights in those areas would range from 65 to 100 feet. Maximum building heights in the Lincoln Heights residential neighborhood would range from 45 to 65 feet.

The finer-grained focus of the proposed land use plan and zoning designations would create a greater level of certainty about future land use patterns compared with Alternative 1. Additionally, Alternative 2 assumes major improvements to multimodal transportation, stormwater and parks & open space systems. These improvements could create development incentives and help achieve the 2040 growth targets and city and regional goals for the Tacoma Mall RGC.

The expansion of the study area to include 116 acres west and north of the RGC would distribute development demand for the Tacoma Mall neighborhood over a larger area. Alternative 2 proposes to update the City's Comprehensive Plan Future Land Use Map to extend the Mixed-Use Center Tacoma Mall RGC designation to the entire study area with the exception of existing designated parks and open spaces. Expansion of urban centers has the potential to lower overall development intensity. The suggested zoning regulations and other subarea plan features proposed under Alternative 2 are designed to direct sufficient development to areas around the Tacoma Mall and along major transportation corridors to create a dense urban core appropriate for a regional urban center.

Mix of Land Uses

The zoning designations proposed under Alternative 2 are Urban Center Mixed-Use (UCX), Commercial-Industrial Mixed-Use (CIX), Neighborhood Commercial Mixed-Use (NCX) and Urban Residential Mixed-Use (URX). Proposed height limits for specific locations within the study area are shown in Figure 2.6 (Chapter 2). Also, the area zoned UCX next to I-5 would only be permitted for commercial uses. The study area currently has UCX, M-1, NCX and RCX designations, which are described in the Existing Conditions section. Under Alternative 2, the M-1 and RCX zoning designation would no longer apply to the study area. The two new zoning designations for the study area, CIX and URX, are described in Chapter 2. The CIX designation would allow for a mix of commercial establishments and light industrial activities and would permit residential uses. The URX designation would allow for medium-intensity residential development, being residential in nature and prohibiting most other types of uses (TMC 13.06.300).

As shown in Figure 2.6 (Chapter 2), under Alternative 2 the UCX designation would make up the largest portion of the study area; covering most of the Mall District, areas in the study area's center along S. Pine St and S. 38th St, and portions of the study area's southwestern and northeastern corners. The CIX designation would only apply along the study area's northwestern edge, most of which is adjacent to S. Tacoma Way. URX designations would be located in the Madison and Lincoln Heights Districts and generally correspond with their associated residential neighborhoods. The NCX designation would cover the smallest portion of the study area, a few parcels inside of the Madison District.

In addition to the new zoning designations, expansion of parks and open space is proposed under Alternative 2. The study area currently contains 6 acres of parks and open space. Alternative 2 proposes that the City work with Metro Parks Tacoma and other parks partners to develop new levels of service for urban parks in the study area and Tacoma's other urban centers, and to develop new parks-planning principles for the study area. The subarea plan includes parks-planning principles for consideration as well as an illustrative concept plan for potential locations of future parks (Figure 2.8 of Chapter 2). The suggested parks-planning principles call for public parks and open spaces in each of the four quadrants, locating them along the Loop Road, providing green stormwater infrastructure and tree canopy, enhancing sense of place and urban design, and meeting the recreational programming needs of dense urban neighborhoods and diverse communities. Once new level-of-service standards and parks-planning principles are established,

the City would work with Metro Parks Tacoma and other parks partners to enhance existing parks and to acquire and develop new parkland in the study area. Acquisition of parkland would take place over time based on the availability of grants and other funding sources, and may not take place in the locations shown in Figure 2.8 (Chapter 2).

Alternative 2 envisions a significant increase in the use of land for public purposes. In addition to new parks and open spaces, there would be numerous new public street segments, shown in Figure 2.7 (Chapter 2). Depending upon real estate market conditions and other factors, it might not be possible to acquire land in the exact locations shown in Figures 2.7 and 2.8 (Chapter 2) for parks and open spaces and public rights-of-way. Development could preclude their development as shown on the concept maps. Other factors that could prevent development as shown could include capital improvement planning needs of parks partners or issues identified during review of specific streets projects. Once land was acquired for public purposes it would be unavailable for other uses for the long term.

Northwest, Lincoln Heights, Mall and Madison Districts.

Changes to the mix of land uses in the four districts would be similar to those discussed under Alternative 1, with some notable exceptions discussed below.

The Northwest and Lincoln Heights Districts encompass a larger area under Alternative 2, and most of the additional area currently contains industrial and commercial uses. Alternative 2's proposed zoning designations would allow for a mix of uses in these areas including light industrial, commercial and residential, whereas they would continue to be zoned light industrial under Alternative 1.

The proposed URX zoning designation in the Lincoln Heights and Madison Districts would help create stable long-term residential areas in the remaining portions of long-time residential neighborhoods in the study area, whereas Alternative 1 would allow for a mix of uses in these areas.

The proposed Commercial Only UCX zoning designation adjacent to I-5 would preserve the existing commercial character of this area, providing a permanent buffer between the interstate and areas to the west with mixed uses. Under Alternative 1, residential and other uses would be allowed in this area.

COMPATIBILITY OF USES

The proposed zoning designations are designed to produce future development patterns in the study area that minimize incompatibilities between land uses through transitioning and buffering. For instance, moderate-intensity areas are located to provide buffers between high- and low-intensity uses. Also, the proposed zoning designations allow for fine-grained control of the range of land uses allowed within small areas, grouping similar land uses together and reducing the potential for incompatibilities. There may be some short-term compatibility impacts similar to those described under Alternative 1 as the study area transitions to the new land use vision, but the long-term effects of Alternative 2 on land use compatibility are anticipated to be positive. Short-term compatibility impacts would be mitigated by the City's existing development standards. Additionally, there may be positive health benefits associated with the proposed zoning designations, to the extent that they result in a more cohesive and compact urban form, such as improved livability, social cohesion and walkability.

Adjacent to the Study Area

There is little potential for land use conflicts adjacent to the study area to the east and to the south, for the same reasons discussed under Alternative 1. There is also little potential for land use conflicts to the north and west under Alternative 2.

Alternative 2 expands the Tacoma Mall Neighborhood boundary west and north to S. Tacoma Way between S. 38th St and S. Fife St. The adjacent area from immediately north of Union Ave. to S. Fife St. is zoned heavy industrial. Alternative 2 creates a transition between this industrial zone and the UCX and RCX designations in the study area by applying a CIX designation along that segment of S. Tacoma Way. The S. Tacoma Way right-of-way also contributes to this transition. The other portions of the western and northern boundaries of the study area are adjacent to existing light industrial zoning designations that provide a transition between UCX and CIX designations in the study area and heavy industrial uses to the west and north of the light industrial designations.

INDUSTRIAL LANDS

The majority of land in the RGC's proposed 116-acre expansion area is currently zoned M-1. Of this, 82 acres are part of the South Tacoma Manufacturing/Industrial Center. Alternative 2 proposes to rezone these lands to CIX and UCX zoning designations and remove them from the South Tacoma Manufacturing/Industrial Center. The City's Comprehensive Plan and *Vision 2040* contain policy guidance to protect

industrial lands and related employment centers. Alternative 2 would reduce total industrial-zoned land in the City, and it is unlikely that this area would be rezoned industrial once designated part of the Tacoma Mall Neighborhood and rezoned for a mix of uses.

The CIX zone allows a similar range of light industrial uses as those in the M-1 District, while also allowing mixed-use, commercial and residential development. Thus the area rezoned CIX would still be available for industrial use. The UCX zone does not permit industrial uses. By rezoning the portion of the study area currently zoned M-1 and removing this area from the Manufacturing/Industrial Center, the City creates the possibility for existing uses to transition to mixed-industrial or nonindustrial uses and for future development of mixed-industrial and nonindustrial land uses. The design standards for the CIX and UCX Districts provide tools to ensure compatibility between uses and a smooth transition between the study area and industrial areas to the northwest.

The City currently has sufficient industrial land capacity. According to analysis conducted by the City in 2013, the Tideflats Manufacturing/Industrial Center has capacity for 57,800 jobs and the South Tacoma Way Manufacturing/Industrial Center has capacity for 22,300 jobs. Each of these centers are targeted for 7,600 jobs by 2040, well within available capacity. The South Tacoma Way Manufacturing/Industrial Center is 690 acres, and rezoning the 82 acres the study area would not significantly impact the MIC's ability to meet the 2040 target. Also, the CIX zoning designation would continue to allow for a similar range of light industrial uses to those permitted in the current zoning designation.

3.1.3 MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action:

- Under Alternative 1, the City's Comprehensive Plan establishes future land uses that would provide sufficient development capacity to meet the City's 2040 growth targets, allow for intensive land use and building patterns that would support City and regional planning goals for regional centers, and mitigate potential land use compatibility impacts.
- Under Alternative 2, new future land use designations are proposed that would provide sufficient development capacity to meet the City's 2040 growth targets for the

study area and for the South Tacoma Way/Manufacturing Industrial Center, allow for intensive land use and building patterns that would support City and regional planning goals for regional centers, and mitigate potential land use compatibility impacts.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

- Under both alternatives, existing City development standards for building character, noise, light and glare are anticipated to help mitigate potential compatibility impacts.
- Under both alternatives, the zoning regulations that implement the City's current Comprehensive Plan would provide sufficient development capacity to meet the City's growth targets, support goals for regional centers and mitigate potential land use compatibility impacts.
- Under Alternative 2, proposed Phase I code amendments would further promote land use compatibility, providing a fine-grained distribution of land use density and intensity throughout the neighborhood and new design standards to enhance community character.

OTHER MITIGATION MEASURES

Any mitigation not contained in the categories above

- Under both alternatives, monitor development trends to evaluate whether they support achievement of the 2040 growth targets and city and regional goals for the Tacoma Mall neighborhood, and consider development incentives or other measures if needed.

3.1.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse land use impacts are anticipated under either alternative.

3.1.5 SOURCES

City of Tacoma, *Tacoma 2040 Comprehensive Plan*, December 2015.

City of Tacoma. *Tacoma Municipal Code*. Chapter 13.

Community Attributes Inc. (CAI), Existing conditions analysis for the Tacoma Mall Neighborhood Subarea Plan, January 2016.

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

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

Tacoma News Tribune, Eviction closes athletic club near Tacoma Mall, December 2013, Available online, <http://www.thenewstribune.com/news/business/article25863517.html>.

Tacoma-Pierce County Health Department, A Guide to Integrating Health into State Environmental Policy Act Review, July 2013.

Tacoma-Pierce County Health Department, Existing conditions analysis for the Tacoma Mall Neighborhood Subarea Plan, January 2016.

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.

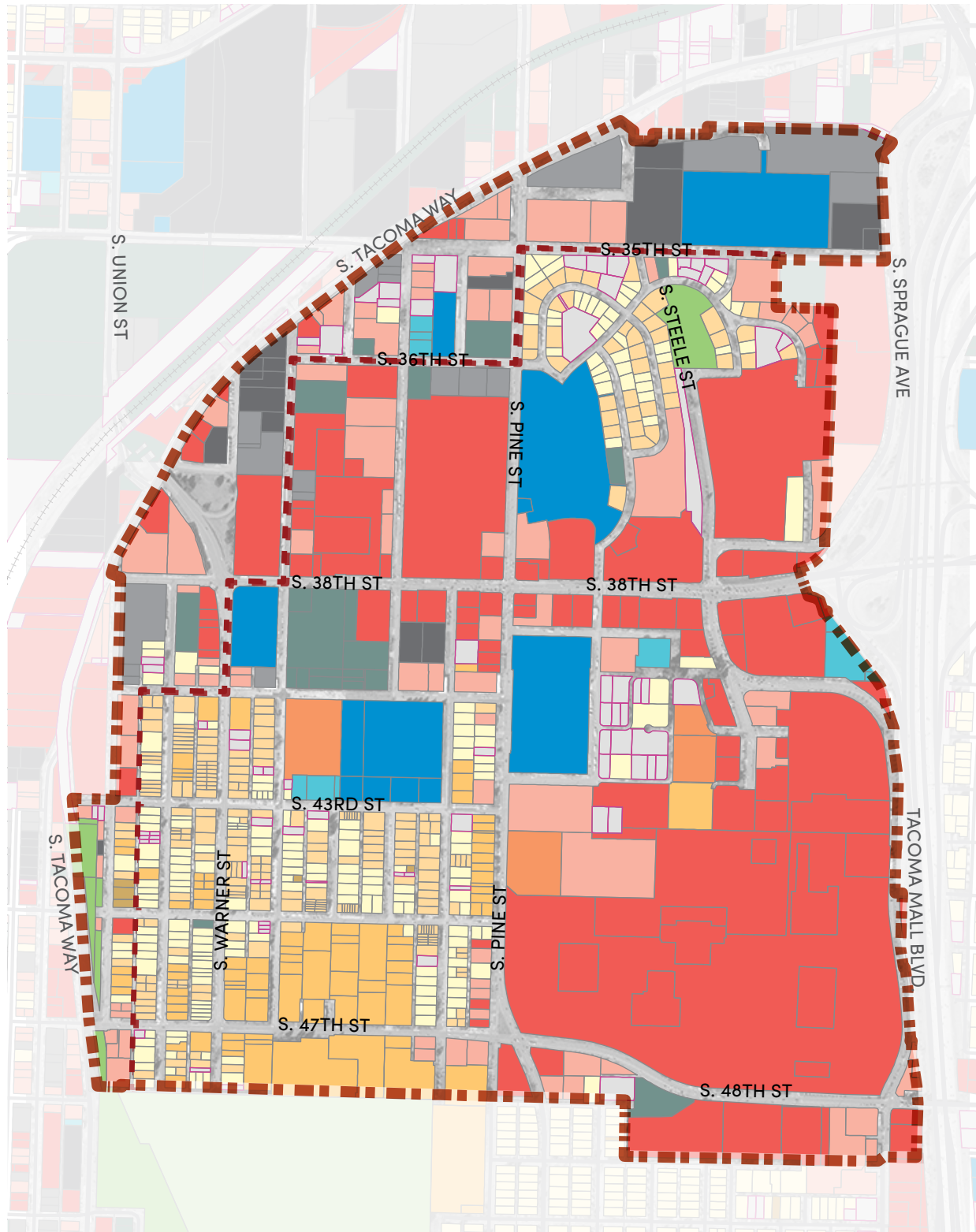


Figure 3.1.3. Existing land uses

Source: City of Tacoma, 2016; 3 Square Blocks, 2016.

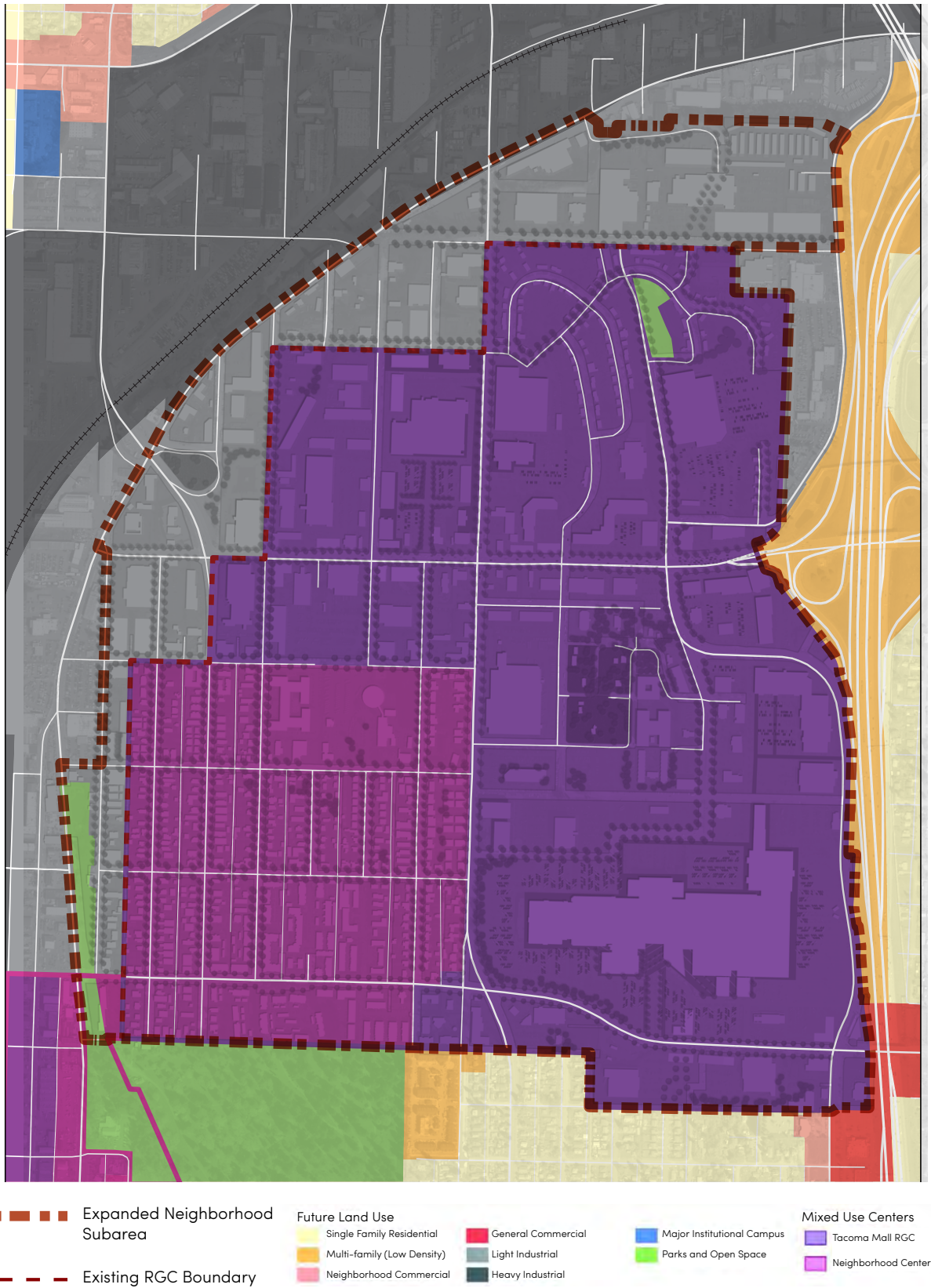


Figure 3.1.4. Existing Comprehensive Plan future land use

Source: City of Tacoma, 2016; 3 Square Blocks, 2016.

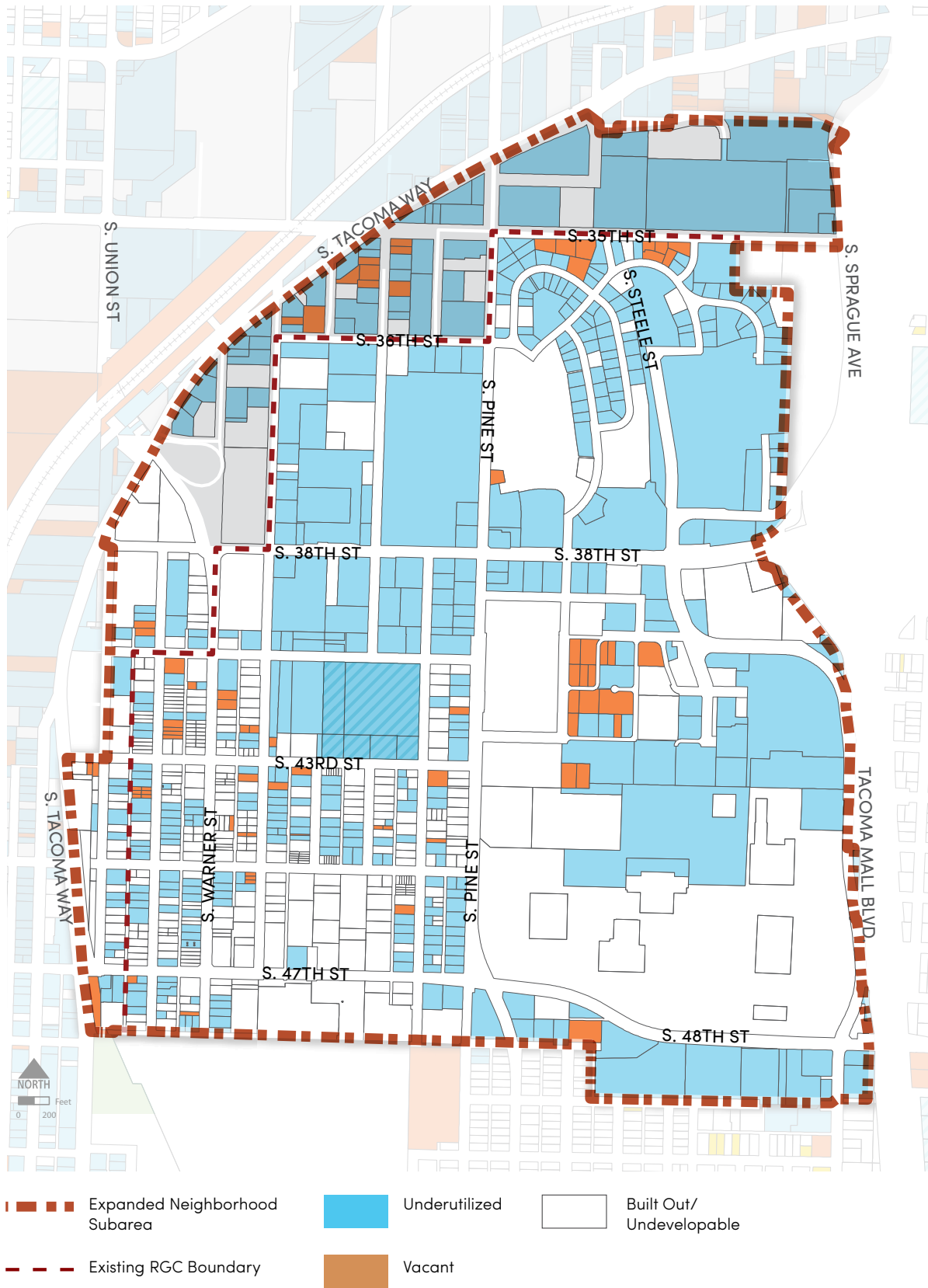
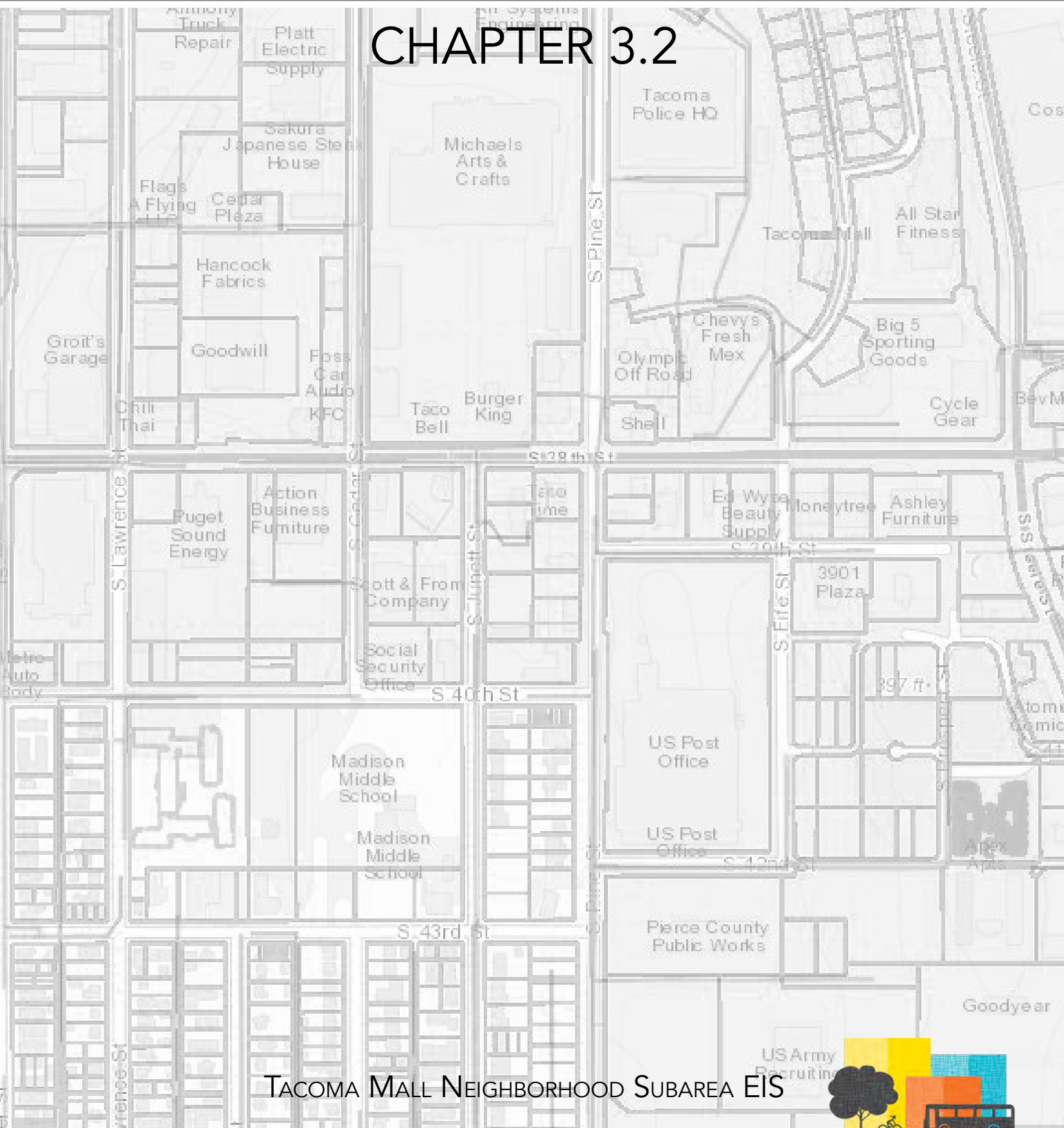


Figure 3.1.5. Buildable lands

Source: City of Tacoma, 2016; 3 Square Blocks, 2016.

PLANS & POLICIES

CHAPTER 3.2



TACOMA MALL NEIGHBORHOOD SUBAREA EIS



PLANS & POLICIES

3.2.1 INTRODUCTION

This section of the Draft EIS describes pertinent plans, policies, regulations and programs that guide or inform the proposal. Federal, state and regional plans and policies evaluated in this section include the US Environmental Protection Agency National Estuaries Program, Washington State Growth Management Act, Puget Sound Regional Council *Vision 2040*, Puget Sound Partnership Action Agenda and the Pierce County Countywide Planning Policies, each establishing a regulatory or policy framework with which a subarea plan must be consistent. Local policy guidance evaluated in this section includes the City of Tacoma Comprehensive Plan, the Tacoma 2025 Strategic Plan and the Tacoma Climate Action Plan. A comprehensive review of potentially applicable plans and policies developed as part of the subarea planning process is included Appendix B of this EIS.

3.2.2 EXISTING CONDITIONS

US ENVIRONMENTAL PROTECTION AGENCY– NATIONAL ESTUARIES PROGRAM WATERSHED PROTECTION AND RESTORATION GRANTS

Puget Sound is one of 28 estuaries of national significance designated by the National Estuary Program (NEP). Under this program, the US Environmental Protection Agency (EPA) receives federal funding to support local efforts to protect and restore Puget Sound. These funds are used for financial assistance to state, local and Tribal governments for their efforts to implement the Puget Sound Action Agenda. In January 2011, the EPA selected the Washington Departments of Ecology and Commerce to receive a grant for “Watershed Protection and Restoration.” The state awarded the City of Tacoma NEP grant funding for development of the Tacoma Mall Neighborhood Subarea Plan & EIS in recognition of the importance of compact urban development patterns in the regional effort to restore the health of the Puget Sound.

WASHINGTON GROWTH MANAGEMENT ACT

The Washington State Growth Management Act (GMA) was adopted in 1990 in response to concerns over uncoordinated growth and its impacts on communities and the environment. The GMA includes 13 planning goals to help guide its implementation. These goals address (1) encouraging growth in urban areas, (2) reducing sprawl, (3) encouraging multimodal transportation systems, (4) encouraging a variety of housing types, including affordable housing, (5) encouraging economic development, (6) recognizing property rights, (7) ensuring timely and fair permitting processes, (8) protecting agricultural, forest and mineral lands, (9) retaining and enhancing open space and supporting recreation opportunities, (10) protecting the environment, (11) encouraging citizen involvement in planning processes, (12) ensuring adequate public facilities and services, and (13) encouraging historic preservation. A fourteenth goal was added to the GMA to reference the use preferences of the Shoreline Management Act.

In 2005, the legislature amended the GMA to require communities to adopt and implement plans and strategies to promote an increase in physical activity among Washington State citizens. In response to this requirement, jurisdictions are required to update transportation elements to include a pedestrian and bicycle component as well as identify planned improvements for those facilities and corridors. This can encourage physical activity and improve health and well-being.

Comprehensive plans are mandated by the GMA to include specific chapters, referred to as elements. Required elements include land use, housing, capital facilities, utilities, transportation, economic development, and parks and recreation. The GMA and other state and regional policies provide specific guidance for the contents of these elements. Cities are also allowed to include optional elements in their comprehensive plans, such as subarea plans.

The entire comprehensive plan, including the required and optional elements, must be internally and externally consistent. Internal consistency means that all elements of a plan are consistent with the future land use map contained in the land use element and that the different elements are mutually supportive. For instance, the transportation projects outlined in the transportation element must support the land use patterns called for in the land use element. The requirement for external consistency means that the comprehensive plan must be coordinated with adjacent jurisdictions.

The GMA also requires that plans address provision of sufficient land capacity to meet growth targets, establishment

of level of service (LOS) standards, and public participation. A city must designate adequate land to accommodate twenty-year growth forecasts from the Office of Financial Management based on the requirement to provide sufficient capacity to meet growth targets. A comprehensive plan must include LOS standards for transportation facilities and may include LOS standards for other types of public facilities as well. The comprehensive planning process must include a public participation program providing for early and continuous opportunities to share input and ideas for the plan and its implementation.

Implementation of comprehensive plans is accomplished largely through development regulations and capital budget decisions. The GMA states that jurisdictions' development regulations and budget decisions must conform to their comprehensive plans.

VISION 2040

Vision 2040, developed by the Puget Sound Regional Council (PSRC) and its member governments in King, Kitsap, Pierce and Snohomish Counties, is the regional plan for where and how growth will occur in the four-county region. *Vision 2040* includes a regional growth strategy, an environmental framework, policies to guide growth and development, implementation actions and measures to track progress. The growth strategy is based on a centers concept, in which the majority of the region's growth is directed to centers within five Metropolitan Cities and 13 Core Cities. *Vision 2040* designates Tacoma as a Metropolitan City and the Tacoma Mall neighborhood as a Regional Growth Center (RGC). As an RGC, the Tacoma Mall neighborhood is required to establish residential and employment growth targets that accommodate a significant share of the City's growth. The Tacoma Mall RGC also receives priority when applying for federal funding for infrastructure, such as transportation facilities, due to its RGC designation.

Vision 2040 includes multicounty planning policies with which all jurisdictions in the four-county area are required by the GMA to comply. *Vision 2040* divides the multicounty planning policies into three categories: (1) general, (2) environment and (3) development patterns. The general policies call for coordinated planning, monitoring *Vision 2040*'s implementation and performance, and overcoming fiscal challenges to find the revenues necessary to maintain and operate services and facilities and fund and develop new facilities to serve growth. The environmental policies call for greater environmental sustainability through improved

coordination and increased commitment to protecting habitat, restoring natural systems, conserving resources and developing green technologies. The development pattern policies call for concentrating growth and future development into existing urbanized areas in order to create more vibrant communities, reduce reliance on the automobile, minimize growth in the region's rural areas, protect resource lands and ensure that resources are available to meet the needs of future generations.

Vision 2040 acknowledges that the health and well-being of the region's people is fundamental to maintaining and improving the region's sustainability and quality of life. Multicounty planning policies call for designing transportation facilities to serve all users safely and efficiently. This includes building and improving sidewalks, bike lanes, trails and paths, and adopting land use strategies to bring homes closer to jobs, shopping, services and recreation activities. *Vision 2040* also states that health considerations should be addressed in regional and local planning and decision-making processes. It encourages design guidelines in the construction of buildings and facilities and regional farming and food production.

The PSRC measures the density and intensity of development in centers by adding together total population and employment. The total of population plus employment is referred to as total activity units, which are used to measure the degree to which the vision for urban centers as a focus for growth is being achieved. For example, the Tacoma Mall RGC is described as having a total of 10,932 activity units (based on 2010 census data), with a focus on employment activity (66% jobs/34% residents) and a moderate density of activity (22.5 activity units per gross acre). For comparison, the average activity level identified for all RGCs in the PSRC 2013 *Regional Growth Centers Monitoring Report* was approximately 42 activity units per gross acre.

Vision 2040 is implemented through PSRC's policy and plan review of each county and city comprehensive plan and its amendments, including center plans such as the Tacoma Mall Neighborhood Subarea Plan. This analysis uses the PSRC criteria for reviewing center plans, as established in the Regional Center Plans Checklist, as a framework for considering consistency with PSRC policy guidance. The Checklist is intended to assist jurisdictions in developing, updating and amending their center plans and provides the key expectations for RGC plans. The Checklist includes seven topics: center plan concept (vision), environment, land use, housing, economy, public services and transportation. Please

see Appendix C for the complete Checklist, and the Impacts section for a discussion of the consistency of the proposal and alternatives with these topics.

PUGET SOUND ACTION AGENDA

In 2007, the Washington Legislature created the Puget Sound Partnership to coordinate the regional effort to clean up Puget Sound. Updated in 2014, the Action Agenda recognizes that city and county governments are the primary implementers of many near-term actions described in the Action Agenda.

Applicable policy guidance found in the Puget Sound Action Agenda includes

- **A2.3**—Implement restoration projects in urban and developed areas while accommodating growth, density and infill development.
- **A3.1**—Use integrated market-based programs, incentives and ecosystem markets to steward and conserve private forest and agricultural lands.
- **A4**—Encourage compact regional growth patterns and create dense, attractive, and mixed-use and transit-oriented communities.

“Encouraging compact urban patterns would direct development away from working farms and forestlands and protect food and fiber production, wildlife habitat, ecosystem functions and water quality. Compact development patterns reduce impervious cover that leads to run-off pollution, and decrease shoreline development that leads to erosion and habitat destruction. Finally, compact development is more energy efficient, reducing energy-related pollution including greenhouse gas emissions.”

- **C2.1**—Manage urban runoff at the basin and watershed scale.

Built Environment Runoff—the Challenge

Urban stormwater runoff poses a high risk to the health of Puget Sound by causing two major problems. First, the runoff transports a mixture of pollutants such as petroleum products, heavy metals, bacteria, nutrients and sediments from construction sites, roads, highways, parking lots, lawns and other developed lands with the following consequences.

PIERCE COUNTY COUNTYWIDE PLANNING POLICIES

The Pierce County Countywide Planning Policies (CPPs) were developed by the Pierce County Regional Council (PCRC) and last amended in July 2014. The CPPs address growth management issues and support *Vision 2040* and the GMA. The GMA requires that local comprehensive plans be consistent with the CPPs.

Topics addressed in the CPPs include affordable housing; agricultural lands; buildable lands; community and urban design; economic development and employment; education; fiscal impact; health and well-being; historic, archaeological and cultural preservation; natural resources, open space, protection of environmentally sensitive lands, and the environment; rural areas; siting of essential capital facilities of a countywide or statewide significance; transportation facilities and strategies; and urban growth areas.

Policies for urban centers, such as the Tacoma Mall RGC, are addressed in the Urban Growth Areas section. In this section, the narrative discussion of centers provides the following guidance:

- Centers are to be areas of concentrated employment and/or housing that serve as the hubs of transit and transportation systems. Centers should do the following:
 - Be priority locations for accommodating growth.
 - Strengthen existing development patterns.
 - Promote housing opportunities close to employment.
 - Support development of an extensive multimodal transportation system that reduces dependency on automobiles.
 - Reduce congestion and improve air quality.
 - Maximize the benefit of public investment in infrastructure and services.

Applicable goals and policies are listed below.

OVERALL POLICIES FOR NONINDUSTRIAL CENTERS

- Centers shall be characterized by all of the following:
 - clearly defined geographic boundaries
 - intensity/density of land uses sufficient to support high-capacity transit
 - pedestrian-oriented land uses and amenities
 - pedestrian connections shall be provided throughout
 - urban design standards that reflect the local community
 - provisions to reduce single-occupancy vehicle use especially during peak hours and commute times

- provisions for bicycle use
- sufficient public open spaces and recreational opportunities
- uses that provide both daytime and nighttime activities
- locations in urban growth areas (13.6 and 13.6.1–13.6.10)
- Infrastructure and services shall be either present and available, or planned and financed, consistent with the expected rate of growth (14.1).
- Priority for transportation and infrastructure funds shall be given to designated centers (14.2).
- Centers shall provide necessary capital facilities needed to accommodate the projected growth in population and employment. Facilities include, but are not limited to, roads, sewers and other utilities, schools, parks, and open space. In order to provide balance between higher-intensity uses within centers, public and/or private open space shall be provided (UGA-16).
- Streetscape amenities (landscaping, furniture, etc.) shall be provided within centers to create a pedestrian friendly environment (UGA-17).
- Adopt development standards that encourage pedestrian-scaled development such as those that address
 - interconnections between buildings and sidewalks;
 - pedestrian links between residential and nonresidential areas;
 - street trees/furniture; and
 - minimizing separations between uses (18.1 and 18.1.1–18.1.4).
- Centers should receive a high priority for the location of high-capacity transit stations and/or transit centers (UGA-20).
- Create a high-density and high-intensity core area to support transit and high-occupancy vehicle use (UGA 21, 21.1–21.3).
- Provisions for nonmotorized transportation shall be provided, including
 - bicycle-friendly roadway design;
 - wider outside lane or shared parking/bike lanes;
 - bike-activated signals;
 - covered, secure bicycle parking at all places of employment;
 - bicycle racks; and
 - pedestrian pathways (UGA-23, 23.1–23.6).

REGIONAL GROWTH CENTERS

Concepts and Principles

- RGCs include a dense mix of business, commercial, residential and cultural activity within a compact area. RGCs are targeted for employment and residential growth and provide excellent transportation service including fast, convenient high-capacity transit service as well as investment in major public amenities (UGA-31).
- RGCs shall plan to meet the following criteria:
 - a minimum of 25 employees per gross acre of nonresidential lands; and
 - a minimum of 10 households per gross acre; and/or
 - a minimum of 15,000 employees; and
 - not to exceed a maximum size of 1-1/2 square miles; and
 - planning policies recognizing the need to receive a significant share of regional growth (UGA-32 and 32.1–32.5).

OVERARCHING POLICIES FOR HEALTH AND WELL-BEING

- The County and each municipality in the County will be designed to promote physical, social, and mental well-being so that all people can live healthier and more active lives.
- The County and each municipality in the County shall incorporate provisions addressing health and well-being into appropriate regional, countywide, and local planning and decision-making processes.

To support this CPP element, the Tacoma–Pierce County Health Department encourages the incorporation of health in major decisions and reviews, such as EIS.

TACOMA 2025

Prepared in 2014, Tacoma 2025 is a strategic plan and vision for the future of Tacoma. Tacoma 2025 was developed to guide the City in decision-making and resource allocation as well as performance tracking and reporting. It has seven focus areas: Health & Safety, Human & Social Needs, Economic Vibrancy & Employment, Education & Learning, Arts & Cultural Vitality, Natural & Built Environment, and Government Performance. It includes the following vision for the City's future:

A Vision for Tacoma's Future

Tacoma is one of the nation's healthiest, safest, and most playful cities. We have daily access to stunning natural surroundings and a great

quality of life. We are Washington's most diverse big city, with arts, culture, parks, and recreational opportunities that are envied by much larger cities. We recognize how lucky we are, but we know we can make it better.

—Tacoma 2025

Core values—consisting of opportunity, equity, partnerships and accountability—shaped the discussion of the future and helped identify key issues and opportunities for the future.

TACOMA COMPREHENSIVE PLAN

Tacoma's Comprehensive Plan looks forward to Tacoma's long-term future, ensuring that growth happens in a beneficial, healthy, and sustainable way. In 2015, Tacoma was the second-largest city in the Puget Sound region and the most important business employment center in the South Sound region. Recognizing Tacoma's role in the region, the PSRC designated Tacoma as a Metropolitan City, serving as Pierce County's civic, cultural and economic hub and a focal point for future population and employment growth. The Comprehensive Plan was informed by and is consistent with the GMA, *Vision 2040*, and the CPPs. Relevant to the proposal, applicable goals and policies in the Urban Form, Design and Development and Economic Development elements are listed below.

URBAN FORM ELEMENT

This chapter includes policies that support enhancing centers across the city as anchors to complete neighborhoods, providing Tacomans with convenient access to local services. Relevant policies are listed below.

Citywide Design and Development

- Promote the development of compact, complete and connected neighborhoods where residents have easy, convenient access to many of the places and services they use daily including grocery stores, restaurants, schools and parks that support a variety of transportation options and are characterized by a vibrant mix of commercial and residential uses within an easy walk of home (Policy UF-1.3).
- Direct the majority of growth and change to centers, corridors, and transit station areas, allowing the continuation of the general scale and characteristics of Tacoma's residential areas (Policy UF-1.4).
- Strive for a safe, healthful, and attractive environment for people of all ages and abilities (Policy UF-1.5).

- Support energy-efficient, resource-efficient, and sustainable development and transportation patterns through land use and transportation planning (Policy UF-1.6).
- Integrate nature and use appropriate green infrastructure throughout Tacoma (Policy UF-1.7).
- Encourage high-quality design and development that demonstrates Tacoma's leadership in the design of the built environment, commitment to a more equitable city, and ability to experiment and generate innovative design solutions (Policy UF-1.8).
- Evaluate the impacts of land use decisions on the physical characteristics of neighborhoods and current residents, particularly under-served and under-represented communities (Policy UF-1.10).

Land Use Designations

The land use designation for the Tacoma Mall RGC is described below, and a minimum allowable site density of 25 dwelling units/net acre is established:

The urban center is a highly dense self-sufficient concentration of urban development. Buildings can range from one to twelve stories and activity is greater than in most areas of the city. It is an area of regional attraction and a focus for both the local and regional transit systems. Many major city arterials connect to the urban center and nearby freeway access is present. Parking is provided both in surface lots and within structures. Internal streets and pathways provide connections among the developments within the center.

Centers

The Comprehensive Plan designates four types of centers including the Tacoma Mall RGC. Policies identify essential elements and functions of centers that will be enhanced over time.

- Focus growth in a citywide network of centers that provide healthy, equitable and sustainable access to services and housing and preserve the city's character and sense of place (Goal UF-2).
- Connect centers to each other and other key destinations (Policy UF-2.2).
- Strictly limit the expansion of the mixed-use center boundaries except where it can be shown that the center has maximized its development potential, has achieved a full range of uses, and the proposed area of expansion will be developed to the fullest extent possible (Policy UF-2.4).

- Support boundary expansion only when a center demonstrates a sustained level of growth consistent with the centers strategy and planned densities, where the demand for additional growth exists, and where the capacity for additional growth is limited (Policy UF-2.4 (a)).
- Design centers to be compact, safe, attractive and accessible, with safe and attractive street environments for people of all ages and abilities (Policy UF-3.1).
- Provide housing capacity to support commercial uses and focus higher-density housing within a half-mile of the core (Policy UF-3.2).
- Encourage residential development for mixed income levels in all centers (Policy UF-3.3).
- Encourage schools and colleges, health services, community centers, daycare, parks and plazas, library services and justice services (Policy UF-3.4).
- Incorporate arts and culture as central components of centers (Policy UF-3.5).
- Encourage public and private investment (Policy UF-3.6).
- Reduce dependence on automobile use (Policies UF-3.7 and UF-3.8).
- Include areas outside the core where commercial uses are restricted, and emphasize low-rise multifamily development more compatible with adjacent single-family development (Policy UF-3.9).
- Integrate nature and green infrastructure and enhance public views and connections to the surrounding natural features (Policy UF-3.10).

Tacoma Mall Center

- Elevate the Tacoma Mall RGC in its role as a regional center of employment, commercial and public services.” (Goal UF-5).
- Strive to achieve the Tacoma Mall RGC’s regional allocation of employment and population growth and continue its role as a retail destination while expanding economic opportunities and services. The center should have the largest concentration of housing in South Tacoma” (Policy UF-5.1).
- Enhance both the internal pedestrian connectivity and connectivity to regional transportation facilities (Policy UF-5.2).
- Enhance the public realm (Policy UF-5.3).
- Transit Station Areas
 - Promote future residential and employment growth in coordination with transit infrastructure and service investments (Goal UF-9).

- Encourage transit-oriented development and transit-supportive concentrations of jobs and housing (Policy UF-9.1).
- Integrate station areas into the neighborhood (Policy UF-9.2).
- Enhance pedestrian and bicycle connections and safety (Policy UF-9.3).
- Promote high-density concentrations of housing and commercial uses (Policy UF-9.4).
- Encourage concentrations of jobs and employment-focused land uses (Policy UF-9.5).
- Enhance connections between major destinations and transit facilities (Policy UF-9.6).

DESIGN AND DEVELOPMENT ELEMENT

The policies in this chapter encourage development that respects context, promotes accessible and attractive public environment and contribute to a welcoming and attractive public realm.

Design and Development of Centers and Corridors

- Create a pedestrian-oriented environment and provide places for people to sit, spend time, and gather with windows, entrances, pathways, and other features that provide connections to the street environment (Policy DD-5.2).
- Responsive to street space width, allowing taller buildings on wider streets (Policy DD-5.4).
- Provide frequent street connections and crossings (Policy DD-5.5).
- Site and design new developments with safe, convenient, connected and attractive pedestrian access (Policy DD-5.6).
- Provide bicycle facilities (Policy DD-5.7).
- On streets with high motor vehicle volumes, encourage landscaped front setbacks, street trees, and other design approaches to buffer residents from street traffic (Policy DD-5.8).
- Integrate natural and green infrastructure, such as street trees, native landscaping, green spaces, green roofs, gardens, and vegetated stormwater management systems, into centers and corridors (Policy DD-5.9).
- Locate public squares, plazas, and other gathering places in centers (Policy DD-5.10).
- Protect and enhance defining places and features of centers and corridors, including landmarks, natural features, and historic and cultural resources (Policy DD-5.11).
- Encourage new development and public places to include design elements and public art that contribute to

the distinct identities of centers and corridors, and that highlight the history and diverse cultures of neighborhoods (Policy DD-5.13).

- Within core commercial areas, encourage uses at street level that generate pedestrian activity and support transit ridership (Policy DD-5.16).
- Centers must remain compact enough to increase densities, facilitate economical and efficient provision of utilities, public facilities and services, and support more walking, bicycling, and transit use (Policy DD-5.17).
- Provide incentives to encourage a variety of development, including recognizing that mixed-use centers are appropriate “receiving areas” for the transfer of development rights, providing the multifamily tax incentive, and others (Policy DD-5.18).

Scenic Resources

- Wherever possible, engage artists to create context sensitive additions that enhance these places (Policy DD-6.1).
- Encourage public and private development to create new public views of Mount Rainier, Commencement Bay, Tacoma Narrows, bridges, gulches, the Downtown skyline and other landmark features (Policy DD-6.3).
- Reduce and minimize visual clutter related to billboards, signs, utility infrastructure and other similar elements (Policy DD-6.5).
- Set priorities for undergrounding of utilities in designated centers (Policy DD-6.6).

Safer By Design

- Promote a sense of safety and foster positive social interaction to help to prevent crime (Goal DD-8 and Policy DD-8.1).

Transitions and Off-Site Impacts

- Support development patterns that result in compatible and graceful transitions between differing densities, intensities and activities (Goal DD-9).
- Minimize the impacts of auto-oriented uses, vehicle areas, drive-through areas, signage, and exterior display and storage areas on adjacent residential areas (Policy DD-9.4).
- Buffer between designated Manufacturing/Industrial Centers and adjacent residential or mixed-use areas to protect both the viability of long-term industrial operations and the livability of adjacent areas (Policy DD-9.6).
- Limit and/or mitigate negative air quality and noise impacts particularly in areas near freeways, high traffic streets (Policy DD-9.7).

Healthy Food

- Ensure that all citizens have nearby, convenient and equitable access to healthy foods (Goal DD-10).
- Recruit and or/retain and expand grocery stores and neighborhood-based markets offering fresh produce in or in close proximity to designated centers (Policy DD-10.1).

ECONOMIC DEVELOPMENT ELEMENT

Regional Growth Centers

- Maintain the Tacoma Mall RGC as a regional retail destination (Policy ED-6.5).
- Support the development of ancillary businesses that build on the strength of current retail attractions (Policy ED-6.6).
- Support additional high-density residential infill that drives new markets for commercial development in the Tacoma Mall Regional Center (Policy ED-6.7).
- Conduct a subarea plan for the Tacoma Mall RGC and pursue funding, incentives and strategies to implement the plan (Policy ED-6.8).

Industrial/Manufacturing Centers

- Strictly limit Comprehensive Plan amendments that convert industrial land (Policy ED-6.20).

CITY OF TACOMA ENVIRONMENTAL ACTION PLAN

As described in the Environmental Action Plan (EAP), it “is a list of meaningful, high-priority actions that the City of Tacoma and our community will take between 2016 and 2020 to meet the environmental goals outlined in the Tacoma 2025 Strategic Plan. The EAP consolidates the priorities of multiple city departments, providing a centralized plan and reporting system for tracking progress toward environmental goals. In this way, it functions both as a management tool for city staff and as a public document providing transparency on the actions the city is taking on behalf of the broader community.”

The EAP is organized into six main areas: Buildings and Energy; Transportation; Materials Management; Natural Systems; Air and Local Food; and Climate Resilience. Each section includes a long-term goal and near-term targets, and describes specific actions that the City will take to improve its own operations as well as farther-reaching actions that affect general life in Tacoma. Actions that individuals can take to contribute to progress in these areas are also highlighted. Actions and targets are monitored, reviewed and adjusted on an annual basis.

CITY OF TACOMA CLIMATE ACTION PLAN

In 2006, the Tacoma City Council adopted a resolution calling for a reduction in greenhouse gas emissions in City operations and pursuing reductions in community emissions through cooperative programs and policies including reusing older buildings, pursuing regional transfer of development rights and enhancing compact and walkable neighborhoods. In 2007, the City Council appointed the Green Ribbon Climate Action Task Force, which published the Tacoma Climate Action Plan in 2008. The City recently updated the Climate Action Plan as part of the EAP. One of five recommended strategies in the Climate Action Plan is “Enhancing Compact/Livable Neighborhoods”:

[The] City should implement smart growth principles—including compact, transit-oriented development within the City’s mixed-use centers—to promote mixed-use developments, affordable housing, green building, green site development, and bike- and pedestrian-friendly neighborhoods. Policies should increase mobility while decreasing dependence on private vehicles.

TACOMA-PIERCE COUNTY BOARD OF HEALTH RESOLUTIONS

The Board of Health recognizes the importance of collaborating with local jurisdictions to create healthy communities. The Board adopted resolutions declaring neighborhoods determinants of health (2014-4416), encouraging the use of health impact assessments in conjunction with the review of proposed actions under the State Environmental Policy Act (2016-4482, 2016-4483 and 2016-4484), and recommending decision-makers at all levels of local and state government consider health in all policies (2016-4495). These resolutions provide guidance as to how to integrate health into all planning elements of this EIS.

ALTERNATIVE 1 (NO ACTION) AND ALTERNATIVE 2 (ACTION ALTERNATIVE)

Alternative 1 (No Action) would maintain the existing RGC boundaries and growth targets as well as the City’s current development regulations for the subarea. Alternative 2 (Action Alternative) proposes to expand the RGC boundaries, increase growth targets for the subarea to account for this expansion, and adopt and implement the Tacoma Mall Neighborhood Subarea Plan including changes to zoning and development regulations.

3.2.3 SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

US ENVIRONMENTAL PROTECTION AGENCY—NATIONAL ESTUARIES PROGRAM WATERSHED PROTECTION AND RESTORATION GRANTS

Consistent with the requirements of the NEP grant awarded to the City of Tacoma, the City has undertaken the planning process described in the EIS to prepare an innovative subarea plan and EIS that sets the stage for transition of the Tacoma Mall RGC into a compact,

complete community. The subarea planning process promotes a healthy environment and supports regional efforts to reduce stormwater impacts to freshwater systems. This EIS identifies the environmental impacts associated with planned growth and development on an area-wide basis and provides for proportional, substantive mitigation for any identified significant adverse environmental impacts.

WASHINGTON GROWTH MANAGEMENT ACT

Both alternatives are consistent with the intent of the GMA goals. However, Alternative 2 allows the City new momentum in focusing growth in the Tacoma Mall RGC. See Table 3.2-1 for a summary assessment of consistency of the alternatives with GMA goals.

VISION 2040

Table 3.2-2 provides a short summary of the criteria found in the Regional Center Plans Checklist, together with a discussion of consistency of the proposal and alternatives to each criterion. It should be noted that under Alternative 2, the City may expand the RGC designation to include 116 acres along the west and north boundary of the existing RGC. As noted previously, the Checklist is intended to assist jurisdictions in developing, updating or amending their center plans and provides the key expectations for RGC plans. As discussed in Table 3.2-2, the proposed action is consistent with checklist criteria. See Appendix C for the complete Checklist.

PUGET SOUND ACTION AGENDA

The proposal is consistent with Puget Sound Action Agenda strategies. Under Alternative 1, water quality measures would be implemented consistent with the City's adopted regulations and policies. Under Alternative 2, specific measures would be adopted and implemented to promote improved Puget Sound water quality. Please see the description of Alternative 2 in Chapter 2 for description of specific stormwater measure included in Alternative 2.

PIERCE COUNTY COUNTYWIDE PLANNING POLICIES

The proposal is consistent with the Pierce County Countywide Planning Policies (CPPs). Table 3.2-3Table 3.2-3 summarizes consistency of the alternatives with pertinent CPPs.

Table 3.2.1. Consistency with Growth Management Act Goals

GMA Goal	Discussion
Encourage growth in urban areas	Both alternatives focus growth in the Tacoma Mall RGC consistent with the City’s adopted growth targets, although Alternative 2 would focus slightly more growth in the study area. Alternative 1 (No Action) plans for 4,040 new households and 7,555 new jobs in the existing RGC. Alternative 2 plans for slightly higher levels of growth in an expanded RGC, with 4,444 new households and 8,385 new jobs.
Reduce sprawl	Both alternatives either meet or exceed the City’s adopted growth targets for the study area. By accommodating growth in the RGC, both alternatives contribute to reducing sprawl. Alternative 2 would guide relatively more growth in the study area, compared with Alternative 1.
Encourage an efficient multimodal transportation system	Both alternatives would promote an efficient multimodal transportation system consistent with the City’s Comprehensive Plan. However, under the No Action Alternative, projected increases in vehicular traffic could result in intersection failures and the current street network is not conducive to efficient bicycle and pedestrian circulation. Comparatively, Alternative 2 incorporates transportation improvements that focus on bicycle/pedestrian mobility, increased transit service and access, multimodal mobility, and green infrastructure. Collectively, these improvements would support an efficient multimodal transportation system to a greater extent than potential improvements under Alternative 1 (No Action).
Encourage a variety of housing types, including affordable housing	Both alternatives plan for a diversity of housing, including affordable housing. Comparatively, Alternative 2 would also set up a monitoring system and provide for actions to achieve no net loss of affordable housing in the subarea.
Promote economic development	All alternatives would accommodate the City’s adopted employment targets. Alternative 2 would plan for the greatest amount of employment growth (8,385 jobs), compared with Alternative 1 (7,555 jobs). Alternative 2 would also take significant steps to catalyze growth and investment, providing greater support for economic development compared with the No Action Alternative.
Recognize property rights	None of the alternatives would restrict or constrain reasonable use of property in the Tacoma Mall study area.
Ensure timely and fair permit procedures	Both alternatives are consistent with the goal of timely and fair permit procedures. The proposal does not include any changes to permit procedures, and it is anticipated that the City will continue to process permits consistent with its adopted code. Under Alternative 2, a streamlined process for SEPA environmental review is proposed. This streamlined process would increase predictability and efficiency of the SEPA review process for development projects consistent with the Tacoma Mall Neighborhood Subarea Plan.
Protect agricultural, forest and mineral lands	The Tacoma Mall RGC is not located near and would not affect any designated agricultural, forest and mineral lands.
Retain and enhance open space and support recreation opportunities	Both alternatives could similarly incorporate policy guidance from the City’s Comprehensive Plan and support continued coordination with Metro Parks Tacoma. In addition, Alternative 2 proposes an enhanced park and open space system that includes both linear and nodal urban parks.
Protect the environment	Future development under both alternatives would be subject to requirements of the City’s adopted critical area and stormwater regulations. In addition, Alternative 2 includes specific stormwater measures intended to enhance water quality and quantity through implementation of an area-wide stormwater strategy and Best Management Practices that infiltrate runoff, provide flood storage and reduce effective impervious surface coverage.
Foster citizen participation	Both of the alternatives allow for citizen participation. The draft Subarea Plan has been developed through a public outreach process that began in 2015 and has included walking tours, a four-day design workshop, community meetings, focus group meetings, stakeholder meetings, communication through a project website and other measures. In addition, the Subarea Plan calls for actions to foster community engagement and empowerment to help guide the neighborhood in achieving its future vision. Additional public outreach is planned for this Draft EIS (see Draft EIS Fact Sheet).
Ensure adequate public facilities and services	As required by GMA, planning and development under both alternatives is required to apply adopted City level of service standards for public services and utilities.
Encourage historic preservation	The proposal does not include any changes to the City’s current regulations protecting cultural and historic resources. These regulations would continue to apply under both of the alternatives.

Source: Washington State Growth Management Act; 3 Square Blocks, 2016.

TACOMA 2025

The proposal is consistent with the vision established in Tacoma 2025. Through the planning process for the Tacoma Mall neighborhood, the core values of opportunity, equity, partnerships and accountability shaped the discussion and helped identify key issues and opportunities for the future. Similarly, the planning process considered the Tacoma 2025 focus areas to ensure that all plan measures support the vision established for each focus area. In addition, the Plan initiates actions to support ongoing community engagement and empowerment.

TACOMA COMPREHENSIVE PLAN

Except as noted below, the proposal is generally consistent with applicable Comprehensive Plan policy guidance. Consistency of the alternatives with goals and policies in the Urban Form, Design and Development, and Economic Development elements is summarized in Table 3.2-4.

TACOMA ENVIRONMENTAL ACTION PLAN

The proposal is consistent with environmental direction established in the EAP. In particular, Alternative 2 would contribute to the furthering EAP goals with respect to transportation, natural systems, air and local food, and climate resilience as described below:

- **Transportation.** Proposed transportation measures would increase access to multimodal options, help to minimize greenhouse gas emissions and air pollution levels, and set priorities for the movement of people and goods.
- **Natural systems.** The proposal seeks to increase green open space and tree canopy, enhance stormwater quality and promote low-impact development.
- **Air and local food.** As noted above, proposed measures to increased multimodal transportation options, increase green open space and expand the tree canopy would support city air quality goals. With respect to local food, the proposal seeks to recruit and promote affordable food sources, such as a local grocery store, local food bank or farmers market.
- **Climate resilience.** Please see the discussion of the Tacoma Climate Action Plan below.

Internal trip capture is the portion of trips generated by a mixed-use development that both begin and end within the development. The importance of internal trip capture is that those trips satisfy a portion of the total development's trip generation and they do so without using the external road system (Texas Department of Transportation, 2007).

Table 3.2.2. Puget Sound Regional Council Vision 2040—Center Criteria Evaluation

Vision 2040, Summary of Centers Criteria	Discussion
<p>1. Center Plan Concept (or “Vision”):</p> <p>Concept/vision should show commitment to human scale urban form and the relationship of the plan to the City’s comprehensive plan, <i>Vision 2040</i>, and CPPs.</p>	<p>Under both of the alternatives, the proposed focus and concentration of growth in the Tacoma Mall study area is consistent with the overall concept for an RGC. Alternative 2 proposes a new vision and guiding principles that demonstrate commitment to a human scale urban form and support taking multiple steps to improve the built environment and enhance public spaces. As discussed in this Plans and Policies discussion, the proposal is consistent with <i>Vision 2040</i> and the Pierce County CPPs.</p>
<p>2. Environment:</p> <p>Protect critical areas, address parks and open space including public and civic spaces, provide for innovative treatment of stormwater and drainage, reduce air pollution and greenhouse gases.</p>	<p>Under both alternatives, critical areas would continue to be protected and low impact development techniques promoted through the existing regulatory framework. Compared with Alternative 1, Alternative 2 provides greater specific guidance to promote parks and open space, stormwater and drainage and multimodal measures to reduce air pollution and greenhouse gas emissions.</p>
<p>3. Land Use:</p> <p>Demonstrate compact and walkable boundaries, accommodate a significant share of jurisdiction’s growth, provide appropriate capacity in residential densities and building intensities, provide a mix of uses, include design standards for pedestrian friendly, transit oriented development.</p>	<p>Both alternatives plan for a walkable urban center with capacity for planned residential and employment growth. A mix of uses and a multimodal transportation system are planned. Alternative 2 plans for specific steps to promote growth consistent with the RGC goals, seeking to catalyze infill and redevelopment and enhance design standards and multimodal transportation systems, which is expected to help achieve growth allocations. Because the No Action Alternative does not include these measures, there is greater risk that future development would not achieve the City’s vision for this area.</p> <p>Using the PSRC’s activity unit calculation as a measure, Alternative 1 would provide an estimated 15,634 additional activity units, Alternative 2 an estimated 17,272 additional activity units.</p>
<p>4. Housing:</p> <p>State existing and projected housing units; provide for a variety of housing types addressing density standards, affordable housing and special housing needs; include implementation strategies and monitoring program.</p>	<p>All alternatives guide a significant amount of additional housing growth to the Tacoma Mall study area, with the greatest concentration proposed under Alternative 2 (4,444 households) and the least under Alternative 1 (4,040 households). A range of housing densities and types would be accommodated under all alternatives. Alternative 2 calls for monitoring and appropriate actions to ensure availability of affordable housing.</p>
<p>5. Economy:</p> <p>Describe the economic and residential role of the center in the city and region; describe key sectors and industry clusters in the center.</p>	<p>All alternatives would accommodate the City’s adopted employment targets for the Tacoma Mall study area. Alternative 2 plans for the largest amount of employment growth, followed by Alternative 1. Alternative 2 also refines zoning, establishes character areas and takes other steps to support economic growth.</p>
<p>6. Public Services:</p> <p>Describe existing and planned capital facilities as well as their financing (e.g. sewer, water, gas, electric and telecommunications). Explain strategies to ensure facilities are provided consistent with targeted growth.</p>	<p>Draft EIS sections 3.7 and 3.8 describe public services and utilities in the Tacoma Mall area. Levels of service as adopted by the City and its partner agencies in delivering public services and utilities would continue to serve as the standard for urban services under both alternatives. In addition, under Alternative 2, planning for some utilities, such as stormwater, would be designed to address specific needs in the study area and may exceed adopted standards.</p>
<p>7. Transportation:</p> <p>Provide a mix of complementary land uses, provide connectivity, design for pedestrians and bicyclists, provide usable open spaces, manage parking, promote on-street parking, develop an integrated multimodal transportation network, address transit, develop complete streets, develop context sensitive and environmentally friendly streets, develop mode split goals.</p>	<p>Both of the alternatives would support the mobility improvements planned or being considered for the study area. However, under the No Action Alternative, projected increases in vehicular traffic could result in some intersection failures and the current street network is not conducive to efficient bicycle and pedestrian circulation. Comparatively, Alternative 2 includes transportation improvements that focus on bicycle/pedestrian mobility, increase transit service and access, multimodal mobility, and green infrastructure by priority. In addition, the mixed-use land use pattern proposed by Alternative 2 supports greater internal trip capture, which helps to reduce overall trip generation. Collectively, these improvements would support an efficient multimodal transportation system to a greater extent than potential improvements under Alternative 1 (No Action).</p>

* As noted in the *Affected Environment* discussion, the Tacoma Mall RGC was designated in 1995 and these criteria were adopted in 2009. Although the proposal considered in this EIS is not subject to these criteria, they provide a framework for assessing the consistency of the proposal with PSRC policy intent for urban centers.

Source: PSRC 2012; 3 Square Blocks, 2016.

Table 3.2.3. Consistency with Applicable Pierce County Countywide Planning Policies

Policy Topics	Discussion
Centers	The proposal is consistent with general centers guidelines contained in the CPPs. Both alternatives would support the future growth of the Tacoma Mall RGC as an area of concentrated employment and housing that would serve as a future hub of transit and transportation. Compared with the No Action Alternative, Alternative 2 provides greater guidance for design, transportation and environmental measures to achieve the vision for the RGC.
Nonindustrial Centers	The proposal is consistent with the overall policies for nonindustrial centers. Because Alternative 2 provides specific guidance for streetscape amenities, transit, nonmotorized transportation, public open spaces and development standards to encourage pedestrian-scaled development, it would provide the greatest opportunity to achieve these elements of the nonindustrial centers policies.
Tacoma Mall RGC	Both alternatives are consistent with the description of RGCs contained in UGA-31 and meet the planning criteria for RGCs. However, Alternative 2 takes multiple actions to catalyze growth consistent with the RGC goals and is more likely to achieve adopted growth targets, compared with the No Action Alternative.
Health and Well-being	Consistent with CPP guidance, the proposed subarea plan adopts a health in all policies approach to address physical, social and mental well-being in each planning element. This EIS incorporates consideration of health to address potential impacts of the proposal wherever possible.

Source: Pierce County, 2014; 3 Square Blocks, 2016.

Table 3.2.4. Consistency with Applicable Tacoma Comprehensive Plan Policies

Goals and Policies	Discussion
<i>Urban Form Element</i>	
Citywide Design and Development	Both alternatives would direct growth to the Tacoma Mall RGC as established by the Comprehensive Plan. Because Alternative 2 provides specific guidance for streetscape amenities, transit, nonmotorized transportation, public open spaces and development standards to encourage pedestrian-scaled development, it would provide the greatest opportunity the development of a compact, completed and connected neighborhood. Alternative 2 would also include design guidelines specific to the Tacoma Mall neighborhood in order to promote high-quality design and to ensure that land use decisions reflect the physical characteristics of the neighborhood.
Land Use Designations	Both alternatives are consistent with the definition of the Tacoma Mall RGC.
Centers	Both alternatives would focus growth in the Tacoma Mall RGC consistent with the City’s 2040 growth targets. Alternative 2 proposes an expansion to the RGC that recognizes existing topography, development patterns and existing and proposed transportation improvements, but is not based on a demonstrated sustained level of growth by which the center has maximized its development potential. Accordingly, the expansion of the RGC proposed as part of Alternative 2 is not consistent with Comprehensive Plan Policy UF-2.4. Alternative 2 provides specific policy guidance for achieving the development character, amenities, transitions and functions called for in the Comprehensive Plan’s centers policies. As such it would provide greater opportunity to achieve these policies, compared with Alternative 1.
Tacoma Mall Center	Both alternatives would seek to elevate the Tacoma Mall RGC in its role as a regional center for employment, commercial and public services. Through adoption of a new subarea plan, Alternative 2 supports new momentum in focusing growth in the Tacoma Mall RGC and achieving the transportation and public realm vision described in the Tacoma Mall Center policies.

Goals and Policies	Discussion
<i>Design and Development Element</i>	
Design and Development of Centers and Corridors	Both alternatives support the transportation improvements, character, amenities, land use relationship and infrastructure described in the policies. Because Alternative 2 provides specific policy guidance for pedestrian improvements, street network connectivity, landscaping, public gathering spaces, compact development and green stormwater infrastructure, it would provide greater opportunity to achieve these policies, compared with Alternative 1.
Scenic Resources	Under both alternatives, protection of scenic resources would be as established in the City of Tacoma development regulations. Alternative 2 promotes urban design and placemaking actions that reflect topography and views.
Safer By Design	Both alternatives would promote a sense of safety and positive social interaction as described in the policies. Alternative 2 would include policy guidance for public gathering places and an active public realm, which could further promote a sense of safety. Alternative 2 also makes substantial safety improvements in the transportation system.
Transitions and Off-Site Impacts	Compared with Alternative 1, Alternative 2 provides for great transitions among high-, medium- and low-intensity development internally, and minimizes the impacts of auto-oriented uses on residential areas. Both alternatives provide for appropriate transitions to the adjacent South Tacoma Manufacturing/Industrial Center (MIC). In particular, it should be noted that, under Alternative 2, the proposed UCX and CIX zones in the RGC expansion area would help buffer residential development in the proposed URX zone from industrial uses in the South Tacoma MIC.
Healthy Food	Both alternatives would seek to establish the population and employment density and intensity that would support a greater number of grocery stores and neighborhood-based markets that offer fresh produce and healthy foods. Alternative 2 calls for actions to empower the local community to advocate and take actions to promote healthy food availability.
<i>Economic Development Element</i>	
Regional Growth Centers	Consistent with the RGCs policies, the proposal considered in this EIS is for a subarea plan for the Tacoma Mall RGC. Both alternatives considered in this EIS would maintain the RGC as a regional retail destination, support businesses that build from current retail attractions and support additional high-density residential infill development. Through adoption of a new subarea plan, up front EIS and proactive infrastructure improvements, as well as through placemaking actions, Alternative 2 may support new momentum in focusing growth in the Tacoma Mall RGC and achieving the economic growth described in the policies.
Manufacturing/Industrial Centers	<p>Alternative 1 would not result in the conversion of land designated for industrial development. Alternative 2 would convert approximately 116 acres of land designated as Light Industrial to Tacoma Mall RGC. This area would also be rezoned from M-1 (Light Industrial) to CIX (Commercial Industrial Mixed-Use) and UCX (Urban Center Mixed-Use).</p> <p>Policy ED-6.20 states that comprehensive plan amendments to convert industrial land should be strictly limited, but does not identify criteria for evaluating proposed conversions. In this case, because the proposed CIX zone allows light industrial uses mixed with other uses, it would result in a partial conversion of industrial lands. The proposed UCX zone would result in a conversion of industrial lands. The areas proposed for CIX and UCX zoning are adjacent to proposed URX (Residential/Commercial Mixed-Use) zones, which are intended primarily for residential development. The proposed zoning changes would help buffer residential development in the RCX zones from industrial uses in the South Tacoma MIC, allowing a gradual transition between the industrial and residential areas, consistent with Comprehensive Plan Goal DD-9 and Policy DD-9.6. Because this change would enhance consistency with an adopted Comprehensive Plan goal and policy, the City concludes that it is also consistent with policy guidance established in Policy ED-6.8.</p>

Source: City of Tacoma, 2016; 3 Square Blocks, 2016.

TACOMA CLIMATE ACTION PLAN

The proposal is consistent with the direction established in the Climate Action Plan. Both alternatives would help implement smart growth principles, including compact, transit-oriented development in the Tacoma Mall RGC. In addition, Alternative 2 specifically promotes increased green open space, improved pedestrian and bicycle access, green stormwater infrastructure, and increased mobility while decreasing dependence on private vehicles. This leads to air and water quality improvements, increased public health and other benefits. In addition Alternative 2 establishes tree canopy goals. Both alternatives seek to promote regional conservation through Transfer of Development Rights (TDRs). Alternative 2 makes this more likely by taking a range of actions to catalyze growth that could seek to utilize the height bonus through TDRs. Additionally, the downzoning in parts of the study area proposed under Alternative 2 could increase developer demand for TDR credits.

TACOMA-PIERCE COUNTY BOARD OF HEALTH RESOLUTIONS

The proposal is consistent with the Board of Health Resolutions by integrating health impacts and benefits in this EIS. Alternative 2 could provide many health benefits, such as promoting physical activity through improved pedestrian and bicycle access, fostering social interaction through better provision of parks and gathering spaces, and improving walking conditions and air quality through increased tree canopy. Alternative 2 could also better address social and economic root causes of health by providing better access to a variety of affordable housing, living wage jobs, healthy foods, recreation opportunities and transportation choices.

3.2.4 MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action:

- Both alternatives would accommodate the 2040 growth targets for housing and employment identified in the Comprehensive Plan, as well as the future vision for land use, housing and community character in the Tacoma Mall RGC.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action:

- As required by the GMA, the City will submit the new Subarea Plan and updated regulations to the WA Department of Commerce for review and comment by the state prior to final adoption.
- Consistent with PSRC's processes for designated RGCs, the City will submit the proposed Subarea Plan and RGC boundary expansion to PSRC for review and approval prior to final adoption.

OTHER PROPOSED MITIGATION MEASURES

Any other mitigation not contained in the categories above:

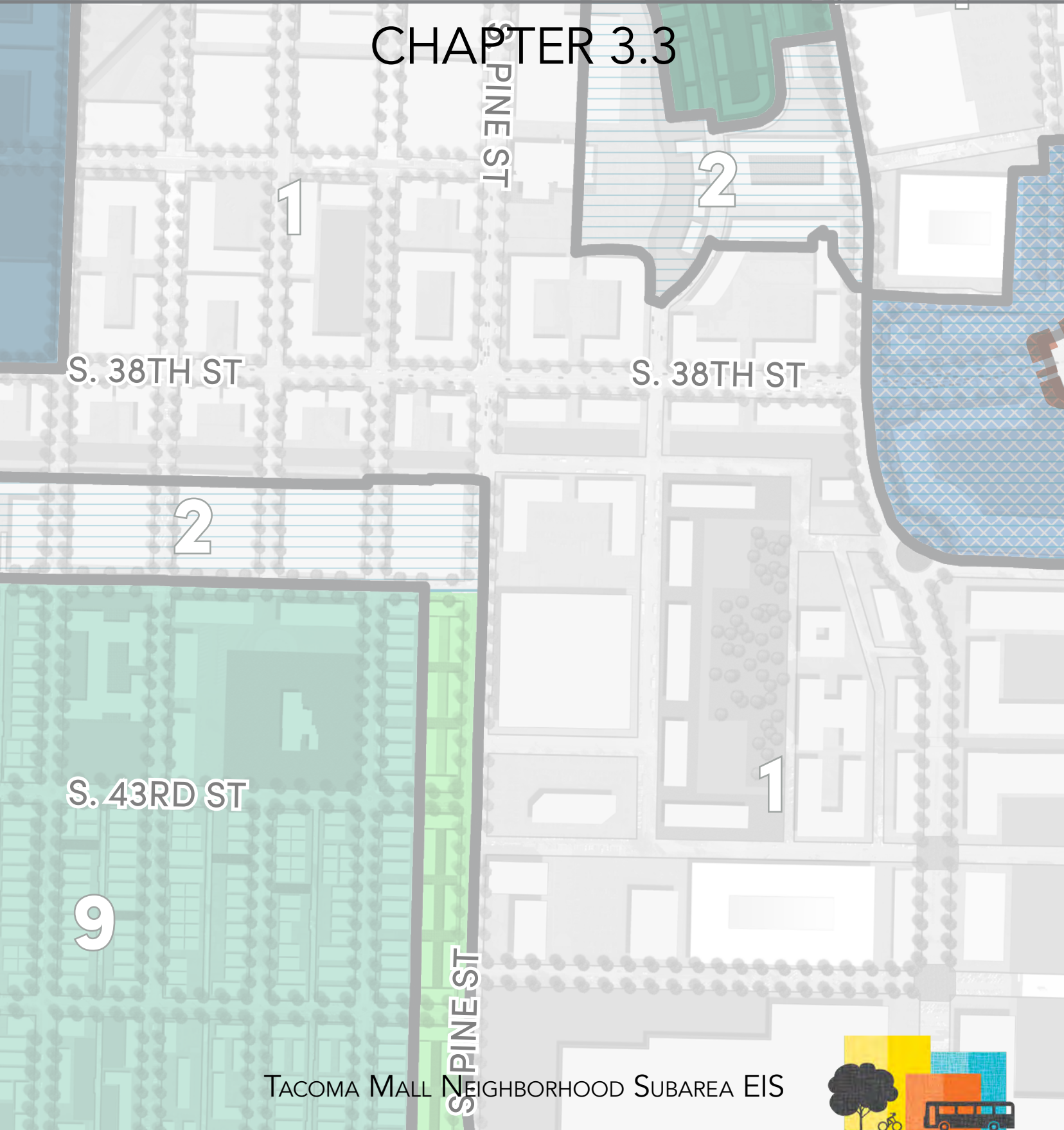
- In order to achieve consistency with Comprehensive Plan policy UF-2.4, the policy should be revised concurrent with the proposed future expansion to the RGC to recognize the topographic, transportation and land use features that are the basis for the proposed expansion. Alternatively, the City could elect to maintain the existing policy and not expand the RGC as proposed.
- Proposed development standards should be reviewed to ensure consistency with adopted comprehensive plan policy guidance.

3.2.5 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts on plan and policy consistency are anticipated.

HOUSING

CHAPTER 3.3



TACOMA MALL NEIGHBORHOOD SUBAREA EIS



TACOMA MALL neighborhood

HOUSING

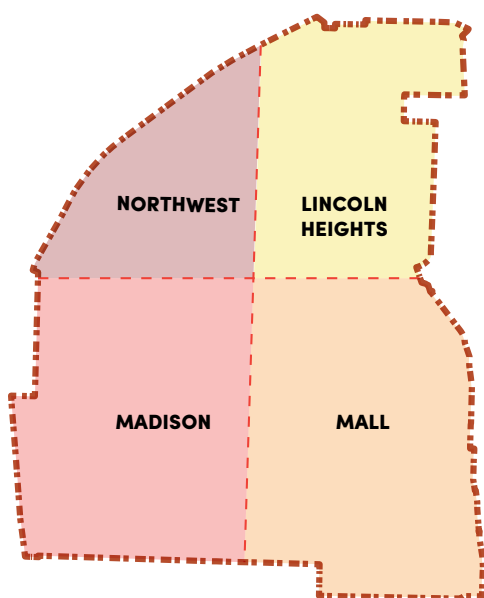


Figure 3.3.1. Study area districts

Single-family detached housing refers to freestanding houses. Single-family attached housing refers to duplexes, triplexes and townhomes. Multifamily housing refers to housing types with four or more units.

3.3.1 INTRODUCTION

This section provides information on existing housing conditions within the study area. It includes a discussion of housing stock, housing costs, affordable housing and existing housing policy and development regulations. Because nearly all housing in the study area is within the RGC, housing data for the RGC is assumed to represent the entire study area. Of approximately 1,900 housing units in the study area, only 20 are estimated to be outside the RGC (Fehr & Peers, 2016).

HOUSING STOCK

The study area comprises roughly 1,900 housing units representing about 2% of the entire City of Tacoma housing stock (PSRC, 2014). Analysis based on 2015 data from the Pierce County Assessor–Treasurer shows that the type of housing built in the study area has changed over time (Community Attributes, 2016). From the early- to mid-1900s, the primary type of housing built was single-family detached. In the mid-1900s, single-family attached housing such as duplexes, triplexes and townhomes, as well as multifamily housing, began to be built (Figure 3.1-1 and Figure 3.1-2). A construction boom occurred between 2000 and 2010. During that time, the number of housing units nearly doubled (PSRC, 2014), and new construction focused on multifamily and single-family attached housing such as townhomes, duplexes and triplexes (Community Attributes, 2016). Current permitting trends indicate continued growth in multifamily housing; city permit records show that between 2010 and 2015, twelve permits were issued for multifamily apartment developments on nine parcels in the study area Madison and Tacoma Mall Districts.

Today over three-quarters of housing units in the study area are multifamily (). Single-family detached housing makes up only 8% of total housing units and is concentrated in the Madison District and Lincoln Heights District residential neighborhoods.

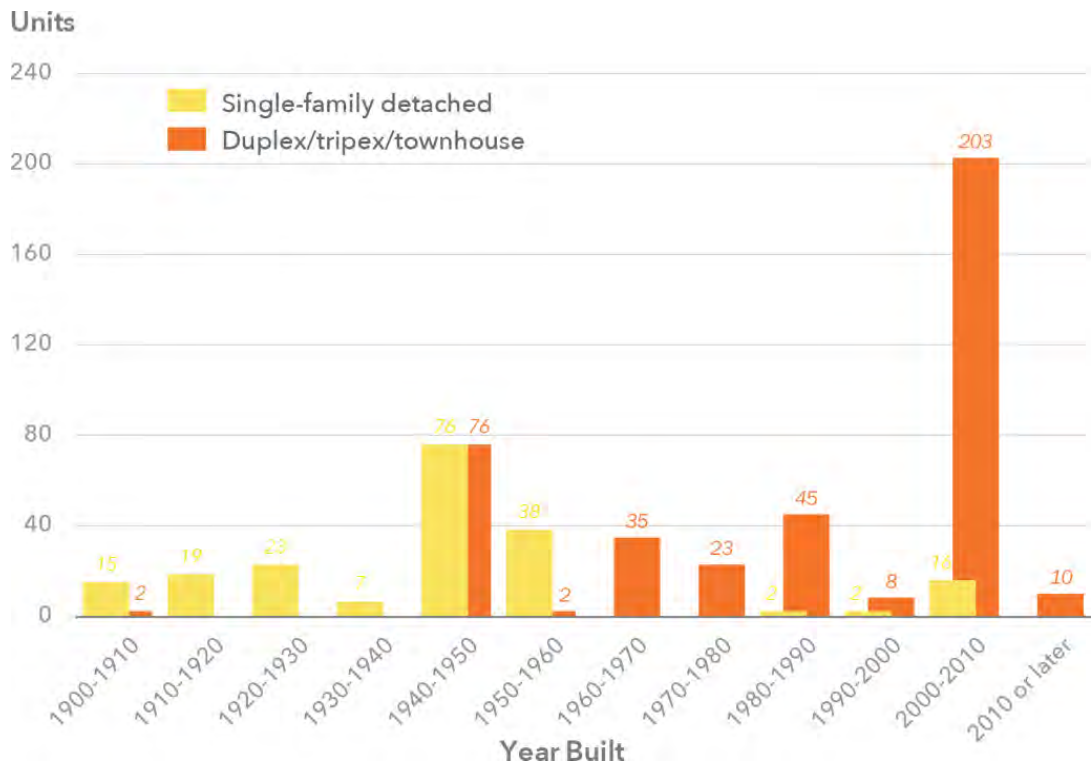


Figure 3.3.1. Single-Family Housing by Year Built

Source: Community Attributes, 2016, based on Pierce County Assessor data on building records through 2015.

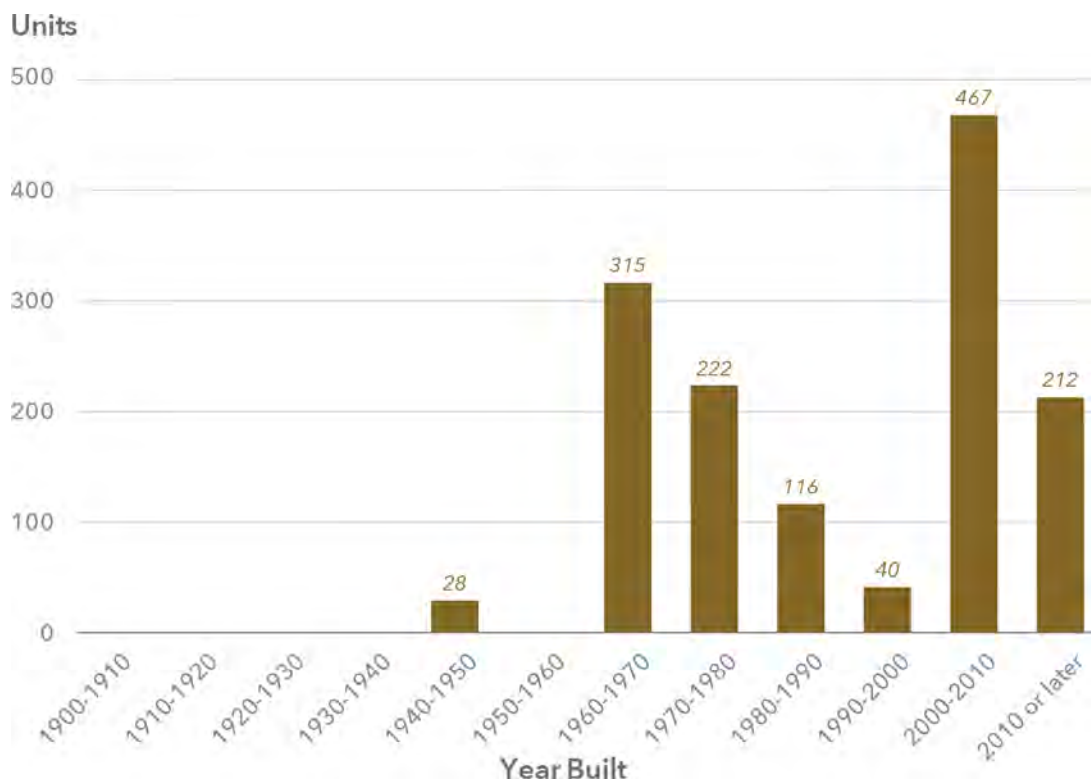


Figure 3.3.2. Multifamily Housing Units by Year Built

Source: Community Attributes, 2016, based on Pierce County Assessor data on building records through 2015.



Photo 3.3.1. Apex Apartments, Mall District



Photo 3.3.2. Pacifica Apartments, Mall District



Photo 3.3.3. Townhomes, Madison District



Photo 3.3.4. Fourplex, Madison District

Table 3.3.1. Housing Units by Type

Type	Percentage of Housing Units
Low-Rise Apartments (3 stories or less)	44
Apartments (4 stories or more)	26
Multifamily 4–8 Units (2 stories or less)	6
MULTIFAMILY	76
Duplex/Triplex	13
Single-Family Detached	8
Townhome	3
SINGLE-FAMILY	24

Source: Community Attributes, 2016.

HOUSING COSTS

Housing costs in the study area are low compared with those of the City and Pierce County, with 84% of housing units in the study area costing below \$1,500 per month compared with 66% in the City and 60% in the County for the same housing cost (Community Attributes, 2016).

Most people living in the study area are renters, and the majority of multifamily units are for rental occupancy (PSRC, 2014). As shown in, the majority of renters pay under \$1,000 per month in combined average rent and utility payments. About a third of renters pay \$1,000-\$1,500 per month. About 2% pay over \$1,500 (PSRC, 2014). Average rental rates may increase in the future as a result of new luxury apartment developments, such as the Pacifica.

Table 3.3.2. Gross Rental Costs

	<\$500	\$500– \$999	\$1,000– \$1,500	\$1,500– \$2,000	\$2,000+	No Cash Rent ¹
Percentage of Renters	1	61	30	2	0	6

Note 1: “No cash rent” refers to renter-occupied housing units without payment of rent. The unit may be owned by friends or relatives who live elsewhere and who allow occupancy without charge. Rent-free houses or apartments may also be provided to compensate caretakers, ministers or others.

Source: PSRC Regional Centers Monitoring Report, February 2014.



Photo 3.3.5. Attached housing, Lincoln Heights District



Photo 3.3.6. Single-family detached housing, Lincoln Heights District

Multifamily housing vacancy rates in the study area were high during the early 2000s, but recently dropped significantly, suggesting that the rental market may be getting tight, which could in turn lead to price increases (Figure 3.1-3).

Homeownership rates in the study area are low. Seventeen percent of households in the study area are homeowners, compared with 52% in the City and 62% in Pierce County (Community Attributes, 2016). The cost of owning a home in the study area is relatively affordable for the region. Over 90% of owner-occupied units are valued at less than \$300,000, and 44% are valued at less than \$200,000 (Table 3.3-3).

Table 3.3.3. Value of Owner-Occupied Units

	<\$200K	\$200K– \$300K	\$300K– \$400K	\$400K– \$500K	\$500K+
% of Owners	44	47	6	2	0

Source: PSRC Regional Centers Monitoring Report, February 2014.

AFFORDABLE HOUSING

The need for housing affordable to all community members is an issue facing Tacoma, the Puget Sound region and many other metropolitan areas across the United States. Lack of affordable housing is a significant social determinant of health. Affordable housing can help to reduce involuntary displacement and help to address homelessness, and as a result can have positive impacts on mental well-being.

Twenty-three percent of households in the study area are below the poverty level (PSRC, 2014), and high demand exists for housing affordable to people who have low and very-low incomes.

The generally accepted definition of affordability is for a household to pay no more than 30% of its gross income on housing, including utilities. Households paying over this amount are considered cost burdened. As shown in, 46% of the households in the study area spend more than 30% of their income on housing. Of this 46%, over half spend more than 50% of their income on housing, which the US Census Bureau identifies as a “severe housing cost burden” (PSRC, 2014). This suggests the need for more affordable housing in the study area, despite the fact that housing costs in the study area are already low in comparison with the City and Pierce County. It

also suggests that a significant number of households may be at risk of displacement or homelessness if their income were to decline or housing costs were to increase.

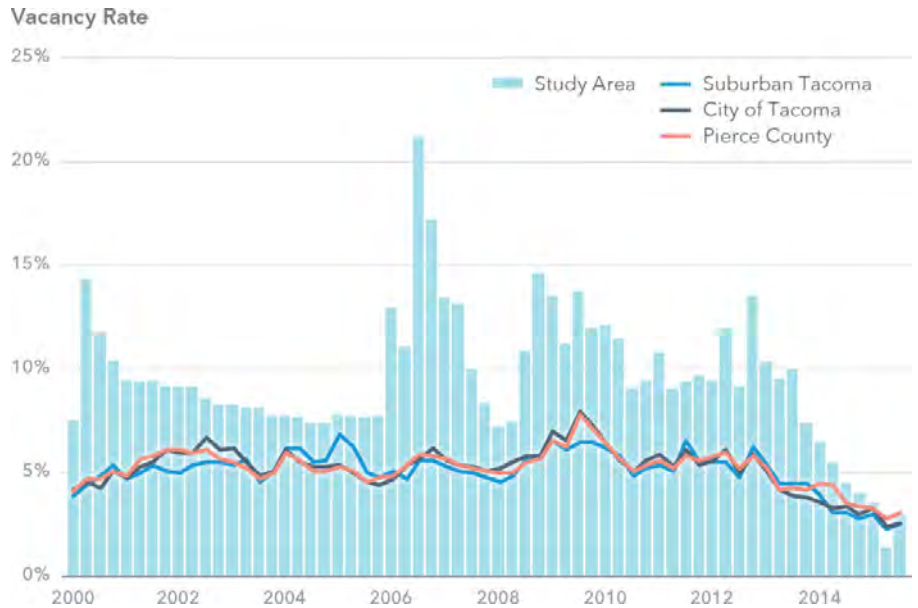


Figure 3.3.3. Multifamily Housing Unit Rents by Number of Bedrooms, Study Area and City

Source: *Community Attributes, 2016.*

Table 3.3.4. Income Spent on Housing

	30% or Less	30%–50%	> 50%	Not Computed
Percentage of Households	48	19	27	5

Source: *PSRC Regional Centers Monitoring Report, February 2014.*

Annual and monthly affordable housing costs for low- and very-low-income Tacoma households were estimated based on the assumption that low-income households earn 80% to 50% of the median income for Pierce County, and that very-low-income households earn 50% or less (Table 3.3-4). This is consistent with income definitions used for federal housing assistance programs (HUD, 2015). The estimates also assume that housing costs of 30% or less of household income are affordable. Comparing these estimates with the rental costs for the study area shown in Table 3.3-2, a significant portion of the rental market is affordable to low-income households. Access to affordable housing for very-low-income households appears more limited.



Photo 3.3.7. The Vintage at Tacoma



Photo 3.3.8. Cascade Park Gardens

Table 3.3.5. Estimated Affordable Housing Costs for Low- and Very-Low-Income Tacoma Households

	Annual Cost	Monthly Cost
Low-Income Households		
<i>Earning 50%–80% of Pierce County median income¹</i>	\$8,880–\$14,210	\$740–\$1,180
Very-Low-Income Households		
<i>Earning 50% or less of Pierce County median income¹</i>	\$0–\$8,880	\$0–\$740

Note 1: Pierce County’s median household income is roughly \$59,200, based on US Census Bureau American Community Survey 2013 5-year estimates.

Source: 3 Square Blocks, August 2015.

AFFORDABLE AND SPECIAL NEEDS HOUSING DEVELOPMENTS

Housing developments within the study area that currently provide affordable housing were identified using data from PSRC’s Subsidized Housing Database and by contacting housing development managers. Two private developments were identified that offer affordable housing for seniors and people with disabilities, the Vintage at Tacoma and Cascade Park Gardens. The Vintage was built with tax credits that require capped rents as defined by the State of Washington, and Cascade Park Gardens offers affordable units registered with the State. Both buildings are located in the Madison District—Cascade Park Gardens is just outside the border of the current RGC but within the study area. The Vintage at Tacoma has 230 units for seniors over 55 years old and Cascade Park Gardens has 114 units. In addition to providing affordable housing units for seniors, Cascade Park Gardens also offers memory care and assisted living services for people with disabilities.

HOUSING POLICY GUIDANCE

Housing policy guidance for the study area is provided by Tacoma’s 2040 Comprehensive Plan, Tacoma’s Consolidated Plan (which provides a five-year framework for addressing housing, human services, community and economic development needs), the Pierce County Countywide Policies and *Vision 2040*. These policies are designed to ensure that there is sufficient development capacity to accommodate 2040 housing growth targets, that healthy and safe housing stock is built, and that a wide range of housing options are available to accommodate the needs of diverse populations, including

people who are low-income, have special needs or require transitional housing.

Policy H-4.2 in Tacoma's 2040 Comprehensive Plan calls for ensuring that at least 25% of the City's housing targets are affordable to households earning 80% or less of area median income. This is consistent with the *Pierce County Countywide Policies and Vision 2040*. Given the population growth targets for both the study area and the RGC, in order to meet this policy guidance roughly 1,000 of the new housing units constructed between now and 2040 would need to be affordable to households earning 80% or less of area median income.

EXISTING HOUSING REGULATIONS

A wide range of housing types are permitted under current zoning in the study area (TMC 13.06.300–400). The majority of the study area is within one of the following X-District zones: UCX, RCX and NCX. Residential uses allowed in all of these zones include single-family, single-family attached, multifamily, group homes and accessory dwelling units. The other zone in the study area is M-1, and part of this zone is within the South Tacoma Manufacturing/Industrial Center zoning overlay. Mixed-use multifamily housing is allowed in the M-1 zone; the only type permitted in M-1 zone within the overlay is workers' housing. Additionally, in the Tacoma Mall RGC density bonuses are available in exchange for including 25% or more residential in mixed-use buildings, under the City's X-District Bonus Program (TMC 13.06.300).

AFFORDABLE HOUSING DEVELOPMENT INCENTIVES

Affordable housing incentives are included in the City's Municipal Code. Chapter 1.39 of the City's Municipal Code outlines incentives that could help to encourage affordable housing in the study area. These include financial incentives such as expedited permit processing and fee reductions for developments providing affordable units. These incentives are resource dependent and are not guaranteed.

In addition, the City's Multifamily Tax Exemption Program creates incentives for multifamily and affordable housing development in Tacoma's mixed-use centers. The program offers an 8-year tax exemption for all multifamily developments, and a 12-year tax exemption in exchange for incorporating at least 20% affordable units in multifamily developments. Under the program, affordability is defined as 80% or less of Area Median Income (City of Tacoma, 2016).

**ALTERNATIVE 1 (NO ACTION) AND
ALTERNATIVE 2 (ACTION ALTERNATIVE)**

Alternative 1 (No Action) would maintain the existing RGC boundaries and growth targets as well as the City's current development regulations for the subarea. Alternative 2 (Action Alternative) proposes to expand the RGC boundaries, increase growth targets for the subarea to account for this expansion, and adopt and implement the Tacoma Mall Neighborhood Subarea Plan including changes to zoning and development regulations.

3.3.2 SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

2040 GROWTH TARGETS AND JOBS/HOUSING BALANCE

Anticipated 2040 housing growth is similar for both alternatives. Under Alternative 1, the 2040 growth target for the RGC is 4,040 new housing units. Under Alternative 2, the proposed study area growth target is 4,444 new housing units. The zoning regulations studied under both alternatives would provide more than adequate development capacity for either alternative.

The 2014 Pierce County Buildable Lands Report contains an estimate of the development capacity in the RGC based on current zoning, and finds that the RGC has the capacity to accommodate an additional 49,862 people, or 24,931 new housing units assuming two people per household (Pierce County, 2014). This is over six times the capacity needed under Alternative 1 for future housing growth. Alternative 2 proposes an expansion of the RGC and changes to the City's zoning regulations for the study area in order to focus growth in the existing commercial areas and to maintain moderate and moderate to low development intensity in the balance of the study area. To understand how these changes would impact future growth, the City generated an estimate of the development capacity that would exist under Alternative 2 using the same methodology as was used for the 2014 Pierce County Buildable Lands Report. Based on this estimate, there would be capacity to accommodate an additional 46,304 people, or 23,152 housing units. This is over five times the capacity needed for the Alternative 2 housing growth targets. Enough housing units can be built on vacant or redevelopable lands within the RGC or study area to accommodate targeted future population growth.

With an existing jobs-to-housing balance in the study area of roughly four to one, existing land use is heavily weighted toward jobs. This balance would shift to be closer to two and a half to one under the alternatives (). The alternatives' 2040 growth allocations would roughly triple the number of existing housing units and double the number of jobs, creating a neighborhood environment that, while still weighted toward jobs, is somewhat more balanced between jobs and housing.

The term “jobs-to-housing balance” or “jobs/housing balance” describes the approximate balance of employment opportunities to households in a geographic area. It is measured in terms of the proportion of jobs per household. For example, a jobs-to-housing balance of 4.0 means four jobs for every household.

Table 3.3.6. Current and Targeted 2040 Jobs/Housing Balances

	Current	2040 Target
Total Jobs		
RGC	7,171	14,726
Study Area	8,290	16,675
Total Households		
RGC	1,881	5,920
Study Area	1,894	6,336
Jobs/Housing Balance		
RGC	3.81	2.49
Study Area	4.38	2.63

Note: Assumes two people per household.

Source: 3 Square Blocks, May 2016.

HOUSING TYPES

Zoning regulations studied under both alternatives allow for a variety of housing types ranging from single-family to multifamily to group housing. Existing housing development throughout the study area reflects the allowed range of housing types, with low to medium building intensities throughout. For example, existing development typically has fewer stories or smaller footprints than the maximum allowed under current zoning. The building envelope for residential development in the study area will likely increase in size and scale over time, in order to accommodate planned growth and to fully utilize building height and bulk permitted through the City’s development regulations.

AFFORDABILITY

Housing in the study area is currently affordable compared with affordability in the City and Pierce County as a whole. Housing costs and home values may rise under the alternatives as development patterns intensify and older housing stock is replaced. It is possible that some residents may be displaced or choose to move elsewhere due to factors such as increasing rental costs, increasing property valuation, and redevelopment of existing rental units. At the same time, new housing development would increase the overall housing inventory, which could help limit upward pressure on rental prices. The City’s current affordable housing development incentives, discussed earlier in this section, could also help to ensure an adequate inventory of affordable housing.

Of the two affordable housing developments in the study area, the Vintage at Tacoma and Cascade Park Gardens,

neither is likely to redevelop in the near future. Neither is located on property identified as underutilized (see Figure 3.1-3 in Section 3.1—Land Use). Also, the Vintage at Tacoma was recently constructed, suggesting it is likely to remain in the neighborhood for some time. As the population of the study area grows, there will likely be additional demand for affordable and special needs housing facilities.

IMPACTS OF ALTERNATIVE 1 (NO ACTION)

Alternative 1 assumes significant development on a project-by-project basis within current RGC boundaries consistent with existing development regulations.

2040 GROWTH TARGETS

Current residential development trends in the RGC are for lower intensities than allowed under current zoning. The gap between allowed and existing intensities creates uncertainty about the nature of future development. Long-term future development trends will depend on many factors including those that cannot be predicted; given current development trends, however, under the No Action Alternative, future residential development activity possibly would not meet the City's 2040 growth target for the Tacoma Mall RGC. See Section 3.1—Land Use for additional discussion.

MADISON AND LINCOLN HEIGHTS RESIDENTIAL NEIGHBORHOODS

Existing zoning regulations allow for mixed uses throughout the RGC, with no areas zoned exclusively for residential uses. The RGC includes two existing residential neighborhoods. The Madison District residential neighborhood was established in the early 1900s, and the Lincoln Heights District residential neighborhood was established around World War II. Over time the character of both neighborhoods has changed. The Madison neighborhood has transitioned from predominantly single-family homes to a mix of single-family, single-family attached and multifamily housing types. The Lincoln Heights neighborhood has decreased in size due to partial redevelopment of the original neighborhood with commercial and public uses. Under existing zoning regulations, these types of changes could continue to occur. Land uses within both neighborhoods could also become increasingly mixed, reducing housing options for residents who prefer to live in single-use neighborhoods.

IMPACTS OF ALTERNATIVE 2

Alternative 2 assumes that significant development will occur incrementally over time in the study area under the proposed future land use plan, zoning and regulatory changes, public infrastructure improvements and policy guidance described in Chapter 2.

2040 GROWTH TARGETS

As discussed under Alternative 1, long-term residential development trends depend on a wide range of factors and are difficult to predict. However, Alternative 2 has features that could create development incentives and increase the likelihood of meeting the 2040 housing growth targets. Under Alternative 2, new zoning standards would provide greater detail and a higher level of certainty about the types of uses and building intensities allowed in specific locations within the study area compared with current zoning. New design standards would require more street trees and are designed to improve aesthetics and sense of place for the study area. Proposed major infrastructure improvements to multimodal transportation, stormwater, and parks and open space would improve quality of life. Policies in the Subarea Plan would support attracting additional services and amenities to the neighborhood, increasing safety, strengthening the neighborhood's identity and integrating more arts and culture into the neighborhood. Area-wide environmental review standards would be adopted as described in this EIS to streamline the permitting process. ; Collectively, these measures could support and encourage increased residential development in the study area.

MADISON AND LINCOLN HEIGHTS RESIDENTIAL NEIGHBORHOODS

The URX zoning designation proposed under Alternative 2 would help protect the study area's two established residential neighborhoods, Madison and Lincoln Heights, designating them for residential uses. Housing types in these neighborhoods would likely intensify over time, but the neighborhoods would remain residential enclaves in the Tacoma Mall mixed-use urban center, providing housing choices for people who prefer to live in residential areas, including existing residents.

EXPANSION AREA

The City proposes to expand the Tacoma Mall RGC under Alternative 2 to include areas currently zoned M-1 and to rezone these areas to UCX and CIX, as described in Chapter 2. This would significantly increase the range of housing types allowed in the expansion area. Also, Action H-3 in the draft Subarea Plan call for encouraging live/work, artist studio housing in the portion of the expansion area proposed to become part of the Northwest District. If this action were successfully implemented it would introduce a new type of housing to the study area, increasing housing choice.

AFFORDABILITY

The discussion of housing affordability under Common to All Alternatives applies to Alternative 2; additionally, Alternative 2 has unique characteristics that could affect the real estate market. Planned improvements to the public realm such as new parks, sidewalks and street trees could potentially lead to increased housing demand in the study area. The creation of a more cohesive land use pattern and development of four distinct character districts envisioned under Alternative 2 could also affect housing costs. It is difficult to accurately predict future real estate market conditions in the study area because many additional unknown factors would be at play including the state of the economy, real estate development in competing housing markets, and changes in housing preferences over time.

The draft Subarea Plan includes police guidance to mitigate potential affordability impacts, including involuntary displacement of current low-income residents. Goals and actions in the Housing Chapter call for maintaining affordability and a wide range of quality housing choices in the neighborhood. Actions H-3 through H-10 specifically address affordability. Action H-3 calls for meeting with developers and housing partners to discuss potential housing strategies for ensuring that at least 25% of new housing built in the Tacoma Mall Neighborhood is affordable to households earning 80% or less of Pierce County area median income. Actions H-4 and H-5 call for providing development incentives to include affordable housing, and for seeking input from developers and housing partners to ensure that development standards for the Tacoma Mall Neighborhood make it simple and cost effective for developers to build moderately and affordably priced housing. Action H-6 calls for working with partners to identify opportunities for very low and special needs housing. Action H-7 calls for monitoring the supply of affordable housing and taking action to ensure that at least 50% of housing units remain affordable to households earning 80% or less of Pierce County AMI and 25% are affordable for those earning 50% of AMI or less. Action H-8 calls for working with housing partners to provide financial assistance to low- and very-low income households struggling to stay in their homes. Action H-9 calls for citywide actions to provide for a range of housing costs in the Tacoma Mall Neighborhood and citywide. Action H-10 calls for a focused study of available and effective options to prevent involuntary displacement of residents. The impacts of these policies will depend upon how they are implemented, but could have a positive impact on affordability.

Additionally, the transportation improvements proposed in the Subarea Plan could help to reduce the cost burden of living in the Tacoma Mall Neighborhood. The Plan includes transportation projects and policies designed to expand transportation choices throughout the study area through complete streets, bicycle network improvements, increased intersection frequency and enhanced transit service. Transportation costs often make up a significant portion of household expenditures. By promoting these transportation choices, the Subarea Plan could have a positive impact on the affordability of the neighborhood.

3.3.3 MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action:

- Under Alternative 2, the Subarea Plan includes specific policy strategies for promoting affordable housing, including working with partners to ensure that 25% of new housing built in the study area is affordable to households earning 80% or less of Pierce County median income, that development standards enable construction of moderately and affordably priced housing, for identifying opportunities for very-low and special needs housing, and for monitoring the supply of affordable housing and maintaining no net loss of the current stock.
- Under Alternative 2, the transportation improvements proposed under the Subarea Plan could reduce transportation costs for neighborhood residents, which could have a positive impact on housing affordability.
- Under both alternatives, the City's Comprehensive Plan provides guidance to ensure that at least 25% of the City's housing targets are affordable to households earning 80% or less of area median income.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action:

- Under Alternative 1, existing zoning regulations allow for a wide range of housing types.
- Under Alternative 2, proposed zoning designations would allow for a wide range of housing types.
- Under both alternatives, the City's Multifamily Tax Exemption Program enhances incentives for affordable housing development in the RGC, and Chapter 1.39 of the

City's Municipal Code outlines other incentives that could be used by the City in the future to encourage affordable housing in the study area, if resources are available to implement them.

OTHER MITIGATION MEASURES

Any other mitigation not contained in the categories above:

- Under Alternative 1, consider a new commitment similar to that proposed under Alternative 2 to monitor housing trends to evaluate whether they support the 2040 growth targets and City and regional housing goals, and consider regulatory changes or other measures if needed.
- Under both alternatives, consider updating the X-District Height Bonus Program to include affordable housing incentives in the Tacoma Mall RGC..

3.3.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse housing impacts are anticipated under either alternative.

3.3.5 SOURCES

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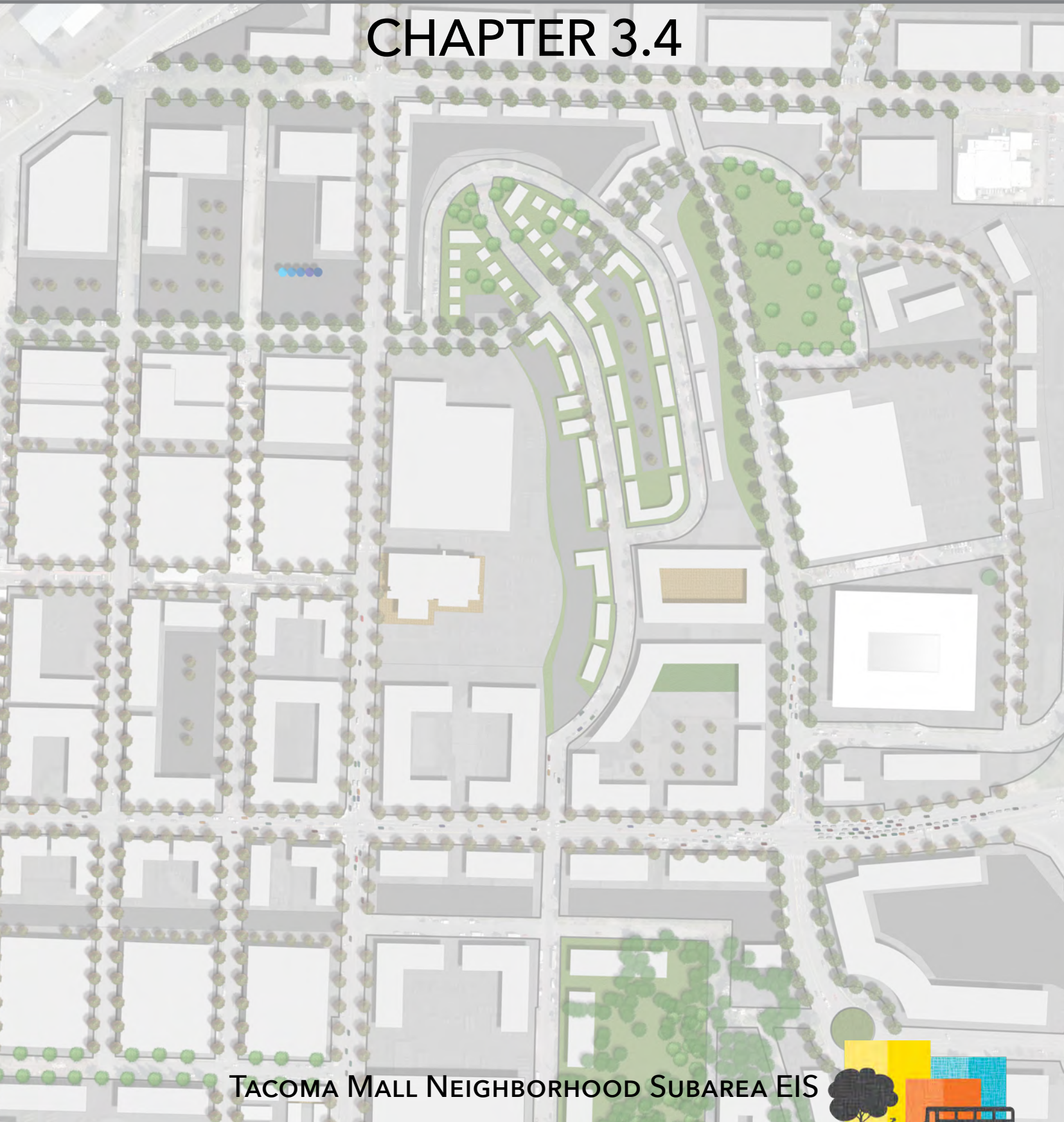
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AESTHETICS

CHAPTER 3.4



TACOMA MALL NEIGHBORHOOD SUBAREA EIS



AESTHETICS

3.4.1 EXISTING CONDITIONS

AREA CONTEXT

The study area was developed with urban land use patterns beginning in the late 1800s and continuing to present day. The design and appearance of existing buildings and infrastructure in the study area are reflective of the different periods in which they were constructed and the development regulations then in place. In the early 1800s much of the study area was farmland or was undeveloped (ESA, 2016). By the 1870s, a railroad corridor was built along the western edge of the study area and buildings were constructed along it related to rail activities—to this day the corridor remains a hub for services related to transportation and industry. Through the mid-1900s small scale single-family homes and traditional street grids developed within the study area, including in the Madison District residential neighborhood (City of Tacoma, 2016).

Beginning around the mid-1900s, a building boom resulted in a wider range of land uses and building types throughout the study area, including more-auto-oriented commercial and industrial uses with generally larger parcel and building sizes. Street design also changed from the traditional grid style to more curvilinear and discontinuous streets. The Lincoln Heights residential neighborhood was built during this time, with urban design typical of suburban development around World War II. In 1965 the Tacoma Mall was built. Designed by nationally recognized architect John Graham, Jr., the mall was a catalyst project that turned the study area into a regional destination and that sparked additional retail and office development, including large shopping centers anchored by big-box retailers (ESA, 2016).

Much of the study area's commercial building stock was built during the 1960s. New commercial construction has occurred at a slower pace since then, with the amount of new space built declining each decade since 1990 (CAI, 2015). Industrial stock in the study area is also aging; most was built between the 1940s and the 1990s, and there has been no new construction



Photo 3.4.1. View north along Pine Street across the Nalley Valley



Photo 3.4.2. Bradken Fabrication, a machine shop located in the study area



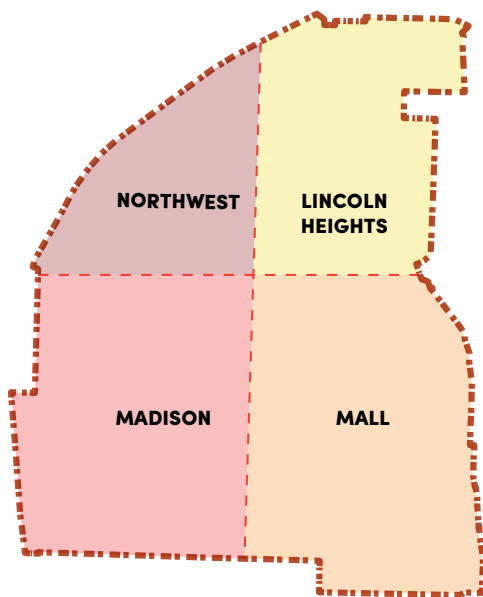
Photo 3.4.3. South Tacoma Way along the western boundary of the study area

since then. There was a housing boom in the 1940s during which time the mix of housing types in the study area became more diverse with the introduction of single-family attached and multifamily structures. There was another housing boom in the 2000s in which these were the primary types of new development. Today most housing stock falls into one of these two categories. In recent years two new luxury apartment developments have been built, the Apex and the Pacifica. Other recent development activity has been for additions and improvements to the Tacoma Mall and other existing large-format retail in the study area (CAI, 2015).

EXISTING CHARACTER

As discussed in Chapter 2, the study area can be divided into four districts whose boundaries align with features of urban form. Two major arterials, S. 38th St. and S. Pine St., divide the study area into quarters. I-5 forms its eastern border. A low bluff above S. Tacoma Way defines parts of its northern and western borders. A large cemetery defines part of its southern border. The thumbnail at right shows the four districts. The defining features of each district are summarized in

Table 3.4-1 District Features



	Land Use Character	Urban Pattern	Streetscape and Public Realm
Madison District	Primarily single-family attached and low-rise multifamily uses, with commercial and light industrial uses in the north and west	Primarily small parcel sizes, narrow blocks, small scale buildings	Partially complete traditional neighborhood street grid with alleys, access to community garden, park and multiuse trail
Northwest District	Commercial, industrial and public uses	Large parcel and block sizes with dispersed large-scale development	Limited street network, topography restricts access
Lincoln Heights District	Single-family attached, low-rise multifamily, commercial, industrial and public uses	Small-scale urban pattern in residential neighborhood, larger-scale commercial and industrial urban pattern in other areas	Discontinuous and curvilinear streets, access to neighborhood park
Mall District	Retail uses anchored by regional mall, with a mix of residential, office and public uses	Large parcel sizes, big box retail, large scale parking areas with few connections, hill with vacant land, disparate scales in areas with mixed uses	Limited street network, informal vehicle and pedestrian access in parking lots, access to private gathering spaces in the Tacoma Mall

Source: 3 Square Blocks, 2016



MADISON DISTRICT

Land Use Character

The Madison District is primarily residential with a mix of single-family detached housing; single-family attached housing such as duplexes, triplexes and townhomes; and multifamily housing including apartments and other developments with more than four units. The residential neighborhood occupies most of the district, with the exception of the nonresidential uses developed along S. 38th St. and a portion of S. Pine St. Near S. 38th St., land uses include a mix of public, commercial and light industrial uses. This is also true of the western border of the district for the study area. The western border of the current RGC does not extend as far west and is defined by residential uses. Vacant lots are distributed throughout the district.

Urban Pattern

The urban pattern of the district reflects its history as a single-family residential neighborhood that was established in the early 1900s, with consistent and small block and parcel sizes. The average parcel size is 0.21 acres and parcels range in size from 0.02 acres to 5.30 acres, with the smallest parcel sizes for townhome units (3 Square Blocks, 2015). The average block size of the original street grid was approximately 4 acres (3 Square Blocks, 2016); many blocks remain this size while others have expanded due to vacated rights-of-way. Figure 3.4-1 shows parcel and block sizes.

The bulk and scale of buildings in the district has transitioned over time, changing from small single-story detached homes to a mix of larger-sized building types. Single-family attached buildings such as duplexes, triplexes and townhomes replicate some of the elements of the remaining single-family homes in the neighborhood, such as small-scale design and pitched roofs, but they generally have larger building envelopes and some have primary entrances oriented to alleys rather than streets. Most apartment buildings in the district are a story or two taller than single-family detached and single-family attached buildings, and have larger building footprints and envelopes. The mix of commercial, public and light industrial buildings in the northern and western portions of the district generally have larger building footprints and private parking areas than the apartments, while being closer in height to the single-family and single-family attached buildings.

Photos 3.4.4–3.4.9. Madison District

Streetscape and Public Realm

The district has a partially complete traditional neighborhood street grid with alleys, shown in Figure 3.4-2. Areas of the street grid with small block sizes and high intersection density contribute to the human-scale character of the district.

The grid's intersection density and overall connectivity has decreased over time due to vacation of public rights-of-way. One example of this is along S. 47th St. where parcels have been assembled to create development sites for large apartment complexes.

The majority of street infrastructure in the district is aging and was built under prior standards that required fewer pedestrian- and environmentally friendly design elements than current City requirements. Many street segments have poor pavement conditions, wide travel lanes, and lack sidewalks, crosswalks, curbs, gutters, designated on-street parking areas and street trees. Overhead powerlines are also a prominent visual feature in the district. Some recent right-of-way improvements have been made concurrent with new development; these are generally located along the frontage of newer buildings.

In addition to public rights-of-way, the public realm in the district includes the 40th Street Community Garden and a portion of South Park including the Water Flume Trail just outside the RGC boundary. The Madison School is also located in the district; it provides specialized educational programming and there is limited public access to school facilities and grounds. These three facilities provide the primary green features in the district. Other green features include landscaped areas around the edges of private and public buildings, and private gardens. The southern portion of South Park and the privately owned Tacoma Cemetery are the nearest green spaces of significant size; they are adjacent to the study area's southwest border and provide visual access to nature.

NORTHWEST DISTRICT

Land Use Character

Commercial and industrial are the primary land uses in the Northwest District. Land uses are organized around S. 38th and a low bluff in the northwestern corner of the district. Retail centers are located along S. 38th St. and a mix of office, retail and industrial uses are located between S. 38th St. and the top of the bluff. Industrial and commercial uses are located at the toe of bluff along S. Tacoma Way. Public uses and vacant lands are interspersed with the industrial uses in the district.



Photo 3.4.10. Image of S. Pine St. Corridor, Southern Border of Northwest District

Urban Pattern

The district has large block and parcel sizes that reflect its current land use and street patterns. The average parcel size is 0.81 acres, and parcel sizes range from 0.10 acres to 15.37 acres (3 Square Blocks, 2016). The building pattern is dispersed in the district, as shown in Figure 3.4-3. Paved and gravel parking areas predominate. Buildings have large footprints and are generally one to two stories tall.

Streetscape and Public Realm

The District is bounded by major streets that provide a high level of automobile access to and from district edges. Street connectivity within the District is limited; there is no east–west through street and only one continuous north–south through street. There is informal vehicle and pedestrian access through private parking lots in the district. Sidewalk character is fair to good, although some streets are missing sidewalks (see Section 3.6—Transportation for more information). Most streets do not have street trees.

The majority of the District lacks green features such as trees and other landscaping. One exception is the vegetated slope in the northwestern corner of the District; it is interrupted by buildings and paved areas but is a recognizable natural feature. Other green features in the District include limited landscaping around parking areas and around the edges of buildings. The district currently has no parks.



Photo 3.4.11. Lincoln Heights Neighborhood



Photo 3.4.12. Northwest District

LINCOLN HEIGHTS DISTRICT

Land Use Character

There is a wide range of land uses in the Lincoln Heights District including single-family detached, single-family attached, public, commercial and industrial uses. Residential uses are concentrated in the Lincoln Heights residential neighborhood, extending southeast from the northwest corner of the RGC boundary and including the public Lincoln Heights Park. Public uses also include the Tacoma Police Department’s headquarters and fleet buildings along the western border of the district, and the Pierce County Annex Campus in the northern part of the district. Commercial uses are located along the western, southern and eastern edges of the district with access to major roads. They consist primarily of destination large format retailers and shopping centers. Industrial uses are located north of S. 35th St., around the Pierce County Annex Campus. With the exception of some vacant property in the Lincoln Heights residential neighborhood, the majority of this District is developed.

Urban Pattern

There is variation among parcel and building sizes within the district. Parcel sizes and building footprints and envelopes in the Lincoln Heights residential neighborhood are much smaller than in other areas of the District. Buildings are also generally taller in areas outside the residential neighborhood, but most are under three stories.

Streetscape and Public Realm

The street pattern reflects the topography and the development history of the district. There is a hill in the center of the district and Montana Avenue, S. California Avenue and S. Steele St. generally run along the edges of the hill. Low bluffs in the northern portion of the district limit transportation access. Both of these topographic features limit vehicle and pedestrian visibility. Streets within the Lincoln Heights residential neighborhood are curvilinear, reflective of the World War II era in which they were built. As residential uses have been replaced by commercial and public uses in this district, the existing Lincoln Heights residential neighborhood and its distinctive curvilinear street network represents the remaining residential community that once occupied much of the district. Redevelopment in the south half of the district has resulted in street vacations, increased block sizes and a disconnected street network. There is also a lack of connection across S. 35th St. within the district.

Most streets in the district have sidewalks in fair to good condition, although some areas, primarily the residential neighborhood, are missing sidewalks. Public street trees and mature trees on private property are adjacent to streets.

The Lincoln Heights district has more green features compared with the other districts. It contains Lincoln Heights Park, a neighborhood park that serves as the primary public space in the district, as well as two undeveloped open space properties with grass and trees owned by Metro Parks Tacoma. Steele St. limits access to the park for residents living to the west of the street, due to its busy traffic, limited pedestrian crossings and change in gradient. Most private residences in the district have yards with mature trees, lawns or gardens. Undeveloped property, such as the bluff in the northern portion of the district and a large undeveloped area along the west side of S. Steele St. contain some vegetation and greenery as well. Landscaped and grass-covered areas can be found in parking lots and around building edges.

MALL DISTRICT

Land Use Character

The Tacoma Mall is the defining feature of the Mall District and is located in the southern half of the district. It serves as an anchor for surrounding uses, which are predominantly large-format retail. The district's northwestern corner has a greater mix of uses including residential, retail, office and public. North of the mall, vacant parcels are clustered on the north and west sides of a hill. South of the Mall, the Pierce Transit Tacoma Mall Transit Center on S. 48th St. serves hundreds of riders each day (Fehr and Peers, 2015).

Urban Pattern

The district has large parcel sizes consistent with its land use pattern. The average parcel size is 1.75 acres, and parcel sizes range from 0.11 acres to 48.5 acres (3 Square Blocks, 2016). Parcel sizes in the northern part of the district are slightly smaller than in the southern part, reflecting the greater mix of land uses north of the mall.

The study area has three buildings with five or more stories, all located in the Mall District. These include two recently constructed apartments, the Apex and the Pacifica, each of which is a relatively large building with a somewhat abrupt transition to smaller scale adjoining development. In particular, the Apex is located on a hill and has the highest rooftop elevation in the study area. The Tacoma Mall is also relatively tall and has the largest building envelope in the study area, but the relationship with surrounding uses does not appear abrupt due to similar building heights and the development patterns around the Mall that occurred organically over time. Other buildings in the district have relatively consistent bulk and scale.

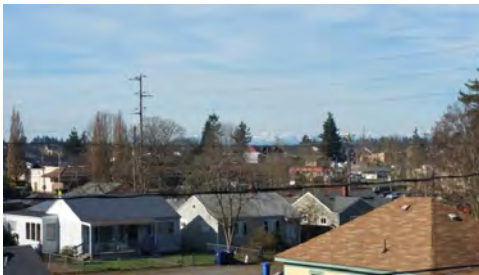
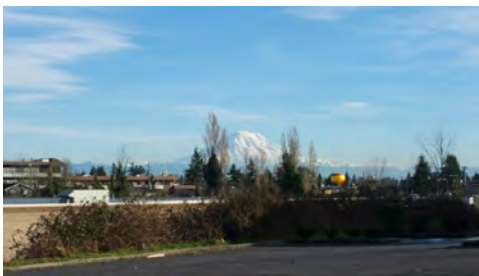
Streetscape and Public Realm

There is a limited public street network within the District. S. 47th/48th St. provides east-west access through the southern portion of the district. The center of the district currently has no public rights-of-way, though the Tacoma Mall parking lot provides internal connectivity for vehicles and pedestrians. Local streets in the northern portion of the district are characterized by a low connectivity.

Pedestrian improvements in the district consist primarily of discontinuous sidewalks and informal pedestrian routes through parking lots. Sidewalk conditions connecting to the Pierce Transit station on S. 48th St. are good to fair. The long distance between the station and the nearest street intersections may be a barrier for some users.



Photos 3.4.13–3.4.14. Mall District



Photos 3.4.15–3.4.16. Views from Study Area

The most significant green feature in the district is the partially wooded vacant property on the hill north of the mall. There is also a vegetated area near the intersection of S. 47th/48th St. and S. Pine St. Other green features include landscaped areas in parking lots and trees and grass around the edges of private buildings.

LIGHT AND GLARE

The study area has typical urban lighting sources including illuminated street signs; street, parking lot, and building lights; vehicle headlights; and security lighting. Lighting sources differ within the study area depending upon existing uses. For instance, lighting sources around the Tacoma Mall and in commercial corridors are taller, brighter and have wider coverage than in residential neighborhoods. Lighting sources are typical of the periods when they were constructed.

VIEWS

Due to study area topography, several locations on private property provide views of the Cascade Mountains and Mount Rainier, nearby neighborhoods and the Nalley Valley industrial area. The most panoramic views and the best mountain views are from the top of the hills in the Lincoln Heights District and the Mall District. Several places have territorial views to the south over the Edison-Gray Neighborhood and to the north and west over the Nalley Valley. The study area currently has no designated view corridors or view overlays.

COMPREHENSIVE PLAN POLICY

The Tacoma Comprehensive Plan provides guidance for urban form in the Tacoma Mall RGC, including the following policies:

Policy UF-5.2 Enhance both internal pedestrian connectivity and connectivity to regional transportation facilities to promote cohesion of the center and to optimize access to the shopping and employment opportunities.

Policy UF-5.3 Enhance the public realm to provide a better setting for business and social activity that serves South Tacoma and the region.

DESIGN STANDARDS

The City’s current development standards help to mitigate potential negative impacts to aesthetics and urban design associated with new development in the study area. Tacoma Municipal Code 13.06.501 describes design standards for development in the Mixed-Use Center X-District zoning

designations, which currently apply to RGC and would apply to the study area under Alternative 2, with some modifications (see Section 3.1—Land Use). Applicable design standards include

- façade articulation options intended to help reduce the apparent mass of structures and achieve a more human scale environment
- façade surface standards to help reduce the apparent mass of structures and achieve a more human scale environment, especially at the first story
- maximum façade widths for upper story façades of buildings greater than 120 feet in width, to break up the massing of the building and add visual interest
- window and openings requirements to increase visibility, provide visual interest to pedestrians, provide natural light and provide architectural detailing
- standards to enhance the pedestrian environment related to customer entrances and street level weather protection
- standards to ensure thoughtful placement and design of utilities, service areas, fencing and retaining walls

In addition to the design standards listed above, additional standards apply to buildings on designated pedestrian streets. In the study area, the designated pedestrian streets are portions of S. Steele St., S. 47th/48th St. and the portion of S. Tacoma Way in the South Tacoma Way Neighborhood Mixed-Use Center. Standards specific to these street frontages include

- maximum building setbacks from the public right-of-way
- façade detail and decorative requirements intended to create an inviting pedestrian environment
- upper floor setback standards intended to reduce the appearance of bulk and reduce the potential for shade and shadow impacts on pedestrian streets

Currently, a portion of the study area outside the RGC is zoned M-1. This light industrial district currently has no design standards (TMC 13.06.501), but does have building envelope standards for maximum height and setbacks (TMC 13.06.400.D). Additionally, the City code establishes landscape and buffering requirements for both the M-1 zone and the Mixed-Use Center X-District zones that contribute to aesthetics and urban design (TMC 13.06.502.E). The landscaping standards establish overall site landscaping minimums and requirements for site perimeter landscaping,

ALTERNATIVE 1 (NO ACTION) AND ALTERNATIVE 2 (ACTION ALTERNATIVE)

Alternative 1 (No Action) would maintain the existing RGC boundaries and growth targets as well as the City's current development regulations for the subarea. Alternative 2 (Action Alternative) proposes to expand the RGC boundaries, increase growth targets for the subarea to account for this expansion, and adopt and implement the Tacoma Mall Neighborhood Subarea Plan including changes to zoning and development regulations.

parking lot landscaping, plantings, street trees and buffers in areas adjacent to residential districts.

3.4.2 SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

Under both alternatives the character of the study area is anticipated to become increasingly urban over time, with a greater intensity and mix of land uses. With new development, there would be a corresponding increase in the average height, bulk and scale of buildings. These changes in urban form could result in impacts to shade, views and light and glare in the study area under both alternatives.

SHADE AND SHADOW

The alternatives allow for development of buildings ranging in height from 45 feet to 120 feet throughout the study area. Generally, as infill development occurs on undeveloped and under-developed sites, as shown in Figure 3.1-3, there would be an increased potential for local shadows on streets and adjacent properties. The potential for shade and shadow impacts would depend on proposed and existing building locations, topography and proposed building height and bulk. Overall, shade and shadow impacts would be typical of an urbanizing area changing from lower-intensity development to more-intensive development.

VIEWS

Similar to the discussion under shade and shadow, infill development on undeveloped and under-developed sites could increase the potential blockage of views from various locations in the study area, including views from private properties of Mount Rainier and the Cascades and territorial views of the Nalley Valley and surrounding neighborhoods. Views within the study area of existing low-rise structures would be affected as neighboring buildings are demolished and redeveloped with taller structures. Recently constructed low-rise buildings will likely be the last to redevelop and would experience the most impacts. As noted previously, the study area does not contain any designated view corridors or view overlays. As future development occurs, consideration should be given to protecting scenic views from public places within the study area.

The view impacts described above could result from development under either alternative. Because Alternative 2 would not result in the potential for increased view impacts

compared with the No Action Alternative (Alternative 1), no significant impacts are anticipated to result from Alternative 2.

LIGHT AND GLARE

New and renovated structures would provide additional light sources within the study area, including interior and exterior building lighting and security lighting. Additional vehicular traffic is also anticipated within the study area and would result in additional light from vehicles entering and leaving the area. The primary sources of glare from development would be direct glare from lighting sources, (such as building and security lighting, vehicle headlights) and reflective glare (such as reflective surfaces on building facades and vehicles). New sources of light and glare would be similar to those that currently exist in the study area and could be perceived as a continuation of existing light and glare in the area. Additionally, the Tacoma Municipal Code includes lighting standards that limit illumination and glare from off-site parking areas and signs (TMC 13.06.510, 13.06.521), and that minimize light pollution to low-intensity residential neighborhoods adjacent to the study area (TMC 13.06.503).

The light and glare impacts described above could result from development under either alternative. Because Alternative 2 would not result in the potential for increased light and glare impacts compared with the No Action Alternative (Alternative 1), no significant impacts are anticipated to result from Alternative 2.

IMPACTS OF ALTERNATIVE 1 (NO ACTION)

Alternative 1 assumes significant development within current RGC boundaries consistent with existing land use and building regulations. Development would occur on a project-by-project basis and impacts would be evaluated on a site-specific basis in conjunction with each proposed project.

LAND USE CHARACTER

Under Alternative 1, the existing land use character in the study area has the potential to change under existing zoning and development regulations. Areas currently developed as primarily single-use and zoned for mixed-use could potentially experience the greatest change in character with future development. These include the Northwest District and residential areas in the Madison and Lincoln Heights Districts. The Northwest District currently has no residential uses but is zoned for a mix of uses including residential. The Madison District and Lincoln Heights District residential neighborhoods are residential but are zoned for a mix of uses, including small-

scale commercial uses in the Madison District residential neighborhood and a wider range of uses in the Lincoln Heights District residential neighborhood. If current development trends are assumed indicative of the future, it is unlikely that these potential changes would occur. However, long-term real estate market development activity depends on a variety of factors and is difficult to predict.

URBAN PATTERN

As discussed in Section 3.1—Land Use, existing building heights throughout the study area are much lower than allowed under current zoning. Compared with Alternative 2, Alternative 1 allows the greatest building heights and mass and, as such, has the greatest potential for increases in building bulk and scale. While this potential exists, past and current real estate market trends in the study area have been primarily for low- and mid-rise development. The gap between allowed urban patterns and development trends creates uncertainty about the intensity of future urban patterns.

STREETScape AND PUBLIC REALM

No major improvements to the streetscape and public realm are planned under Alternative 1. There would be incremental improvements to the streetscape as new development occurred consistent with current City standards. As described in Existing Conditions, the City's Comprehensive Plan identifies pedestrian connectivity and an enhanced urban realm as priorities in the RGC. The City's current building design standards address building massing and creation of pedestrian-friendly street-level environments. The City's development regulations also establish standards for landscaping and street trees that apply to the study area (TMC 13.06.502.E).

As discussed in Existing Conditions, there is a history in the study area of public rights-of-way being vacated to allow for large-scale new development, including developments built in recent years. Under Alternative 1, there is the potential for continued vacating of public rights-of-way that would reduce the amount of public streetscape. Chapter 9.22 of the Tacoma Municipal Code describes the process for petitioning the City for street vacation. The City considers criteria including impacts to public need and mobility when reviewing street vacation petitions, which could help to mitigate significant negative impacts to the public streetscape; however, continued reduction of public rights-of-way could result in further loss of street connectivity, degradation of the human-

scale character of the street grid and decreased mobility for pedestrians and vehicles.

SHADE AND SHADOWS

The City's upper floor setback requirements for development on designated pedestrian streets, discussed under Existing Conditions, would help reduce shading impacts on S. Steele St., S. 47th/48th St. and a small portion of S. Tacoma Way in the southwest corner of the neighborhood. In areas without designated pedestrian streets, new development could increase shade and shadow on streetscapes and other public spaces, making them less friendly and inviting to the public. As development occurs, consideration should be provided to protect public spaces from increased shade and shadow, such as parks, schools and popular pedestrian routes not designated as pedestrian streets.

IMPACTS OF ALTERNATIVE 2

Alternative 2 aims to create a cohesive urban form for the study area that supports a vibrant, attractive and pedestrian-friendly living environment. Policy guidance in the Draft Subarea Plan proposes a new future land use and zoning plan that would be implemented through the proposed Phase 1 code amendments. The Draft Subarea Plan also includes policy guidance to focus density in the core of the study area and step down intensities in surrounding areas; proposes four character districts, each with their own unique sense of place that would contribute to the overall identity of the study area; identifies priority transportation projects that would significantly improve the public realm and street systems while at the same time improving stormwater management; and proposes tree canopy targets that would more than double overall tree cover in the neighborhood over time.

The draft Subarea Plan also includes policy language for improving urban design in the study area. The proposed Phase 1 code amendments under Alternative 2 include new design standards for tree cover and landscaping, parking lots and driveways, drive-thoughts and garbage container placement. These represent initial actions to implement urban design policy guidance in the Subarea Plan; the Land Use Chapter of the Subarea Plan also proposes that the City adopt a Phase 2 code amendment in the future with more extensive urban design standards. The Phase 1 code amendments additionally include new street connectivity requirements for large parcels, which are intended to help increase intersection density and walkability in the study area over time consistent with policy guidance in the plan.

LAND USE CHARACTER

The proposed land use designations and zoning classifications studied under Alternative 2 (shown in Figures 2.5 and 2.6) are intended to group similar land uses and create transitions between different types and intensities of land uses. These redesignations and rezones would provide for changes in the mix of land uses in certain areas and continuation of existing land use character in others.

- The area along the western and northern edges of the study area currently zoned light industrial would be rezoned for mixed-use development in CIX and UCX zoning classifications. This could lead to different land use character compatible with surrounding light industrial, commercial and mixed uses.
- The proposed CIX zone in the Northwest District would help create a transition from an adjacent heavy industrial zone to the adjacent UCX zone. The remainder of the Northwest District, which is currently predominantly commercial, would be zoned for mixed use that could result in changes to the existing land use pattern similar to those discussed under Alternative 1.
- The Madison District and Lincoln Heights District residential neighborhoods would be rezoned for residential uses. This would allow the residential character legacy of these neighborhoods to continue into the future.
- The area between the Tacoma Mall and I-5 would be limited to commercial uses only. This would continue the commercial character of this area over time and create a long-term buffer between residential uses and the freeway.
- The area around the Tacoma Mall and the study area's major streets that Alternative 2 envisions as the urban core of the study area would continue to be zoned for a mix of uses. Existing uses are primarily commercial.

The draft Subarea Plan calls for distinct identities to be fostered for the four districts in the study area (Action UF-2). The Madison District is envisioned to continue as a mixed-scale residential neighborhood, anchored around a new public park complex and with improved streetscapes and stormwater infrastructure. The Northwest District is planned to be a hub of artisan fabrication and production activity, with apartment buildings, urban flats, warehouses and light industrial buildings connected by pedestrian friendly streets and public spaces. The Lincoln Heights District would continue to provide shopping and employment opportunities and the Lincoln Heights residential neighborhood at its core would be preserved and strengthened. The Mall District is envisioned for

the densest urban infill and as the entertainment and cultural center of the study area. The impacts of these policies would depend upon how they are implemented; they could result in significant changes to land use character but are intended to have a positive impact on aesthetics and urban design.

URBAN PATTERN

Under Alternative 2, new future land use plan and zoning intensities are intended to create an urban core for the neighborhood by focusing highest-intensity uses along portions of S. 38th St., S. Pine St. and Tacoma Mall Boulevard, and by downzoning noncore areas for moderate-to-high and low-to moderate intensities. Maximum building heights of 75 to 120 feet would be allowed in core areas. Adjacent areas would step down to 65 to 85 feet. In the least intensive areas, maximum building heights would be limited to 45 to 65 feet in the Lincoln Heights District residential neighborhood and to 45 feet in the Madison District residential neighborhood. Although Alternative 2 would decrease maximum building heights in certain areas, almost all existing uses would be in conformance due to existing low-to moderate-intensity building patterns in the study area. Consideration should be given to adopting standards for nonconforming development such as those that the City has in place for the Downtown zoning districts. By directing highest-intensity development to specific areas, Alternative 2 could reduce the potential for abrupt transitions in building scale over the long term.

The street network proposed under Alternative 2 (Figure 2.7) would also have a significant impact on the urban pattern of the study area, by increasing the density of the street grid and creating smaller blocks. Under Alternative 2, new street improvements would be accomplished partly through City-funded projects and partly through developer improvements made in accordance with the new street connectivity requirements for large parcels proposed as part of the Phase 1 code amendments. If successfully implemented, the proposed street network is expected to have positive impacts on urban pattern by creating a more pedestrian scale environment.

STREETScape AND PUBLIC REALM

Extensive improvements to the streetscape and public realm are planned under Alternative 2. Goals and actions in the Urban Form, Land Use, Transportation, Environment and Community Vitality chapters of the Draft Subarea Plan call for improvements including new public rights-of-way to increase street connectivity, a Loop Road to provide multimodal access and to create a continuous green space through all districts,

THE EFFECT OF AESTHETICS ON WELL-BEING

A pedestrian-friendly and aesthetically inviting streetscape and public realm support health and well-being by encouraging physical activity, social interaction and providing access to urban green spaces.

new parks and open spaces along the Loop Road, and a number of green infrastructure improvements to improve surface water management and increase tree coverage in the study area. These improvements would require significant capital investments and would likely set priority levels and be funded through the City's annual capital improvement planning and budgeting process, being built incrementally over time as resources allowed. They would likely have a positive impact on aesthetics and urban design and expand the public realm, which could limit the land available for future development to some degree.

While Alternative 2 envisions significant new public right-of-way and streetscape, it also plans for some minor street vacations as needed for public purposes such as potential future parks development, shown in Figure 2.7. As discussed in Section 3.6—Transportation, planned transportation projects would improve overall mobility in the study area. The Draft Subarea Plan includes new policy guidance to approve street and alley vacations only for public purposes (Action T-4). The Draft Subarea Plan includes a goal to increase tree canopy from 9.5% to 25% in the study area, with specific targets for each district (Action E-9). Implementation of this goal could enhance the public realm, increase the green character of private development and contribute to improved water quality and reduced stormwater runoff. The new tree coverage requirements in the proposed Phase 1 code amendments would help to implement this policy guidance. The Phase 1 code amendments also include other measures to improve the aesthetic quality of the public realm such as standards for landscaping, parking lots and driveways, drive-thoughts and garbage container placement.

SHADE AND SHADOWS

The Phase 1 code amendments proposed under Alternative 2 would designate additional pedestrian streets in the study area. Combined with the City's existing upper floor setback requirements for development on designated pedestrian streets, this would reduce potential future shading impacts on a larger area of the public realm compared with Alternative 1. See Figure 3.1-4 for the proposed pedestrian street designations. The lower building height limits proposed under Alternative 2 in the Madison District and Lincoln Heights residential neighborhoods and along the western edge of the study area would also reduce the potential for future shading impacts compared with Alternative 1.

3.4.3 MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action

- Under both alternatives, consistent with the Tacoma Comprehensive Plan, enhance the public realm, internal pedestrian connectivity and connectivity to regional transportation facilities.
- Under Alternative 2, policy guidance for urban design in the Draft Subarea Plan discussed above would reduce the potential for incompatible land uses and abrupt transitions in scale, if successfully implemented.
- Under Alternative 2, policy guidance for the streetscape and public realm in the Draft Subarea Plan discussed above is expected to have positive impacts on aesthetics and urban design, if successfully implemented.
- Under Alternative 2, if successfully implemented policy guidance in the Draft Subarea Plan would provide stricter standards for street vacations than are currently in place, which would have positive impacts on the streetscape and public realm.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

- Under Alternative 2, new future land use designations and zoning designations are proposed that would prevent incompatible land uses and reduce the potential for abrupt transitions in building bulk and scale over the long term.
- Under Alternative 1, existing land use designations and zoning designations would prevent incompatible land uses.
- Under Alternative 2, new tree canopy standards, design standards, street connectivity requirements and pedestrian street designations are proposed that would expand the streetscape and public realm as well as improving its aesthetic quality, mitigating increased demand for these amenities as growth occurred. Additionally, current City development regulations not changed by the Phase 1 code amendment would help to mitigate negative impacts to aesthetics and urban design.
- Under Alternative 1, new development would occur under the City's existing standards for building design, pedestrian designated streets, landscaping and buffering, which would

help to strengthen the existing pedestrian environment, add green features and provide buffers between different types of land uses.

- Under Alternative 2, expanded pedestrian street designations are proposed that would mitigate shading impacts on those streets.
- Under Alternative 1, existing City building standards are expected to mitigate shading impacts on currently designated pedestrian streets.
- Under both alternatives, existing City standards for light and glare are expected to mitigate impacts of new light sources generated by future development.
- Under both alternatives, existing City criteria for street vacations are anticipated to mitigate significant negative impacts to the public streetscape if future developers petition the City for street vacations in the study area.

OTHER MITIGATION MEASURES

Any other mitigation not contained in the categories above

- Under both alternatives, monitor new development trends and consider additional regulations if needed to strengthen aesthetics and urban design.
- Under both alternatives, consider adoption of shade and shadow measures to protect public places other than those on currently designated pedestrian streets, such as parks, schools and other popular pedestrian routes.
- Under both alternatives, consider application of the City's View-Sensitive Overlay District, or other measures, to protect public places that have scenic views.
- Under Alternative 1, consider adopting regulations to preserve the character of the Madison District and Lincoln Heights District residential neighborhoods, similar to those proposed under Alternative 2.
- Under Alternative 2, consider adopting standards for nonconforming development such as those that the City has in place for the Downtown zoning districts.
- Under Alternative 2, after adoption of the Subarea Plan and the Phase 1 code amendments identify additional code changes and other actions needed to implement policy guidance in the plan related to aesthetics and urban design, as called for in the Land Use Chapter of the Subarea Plan.

3.4.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse to aesthetics and urban design are expected under either alternative.

3.4.5 SOURCES

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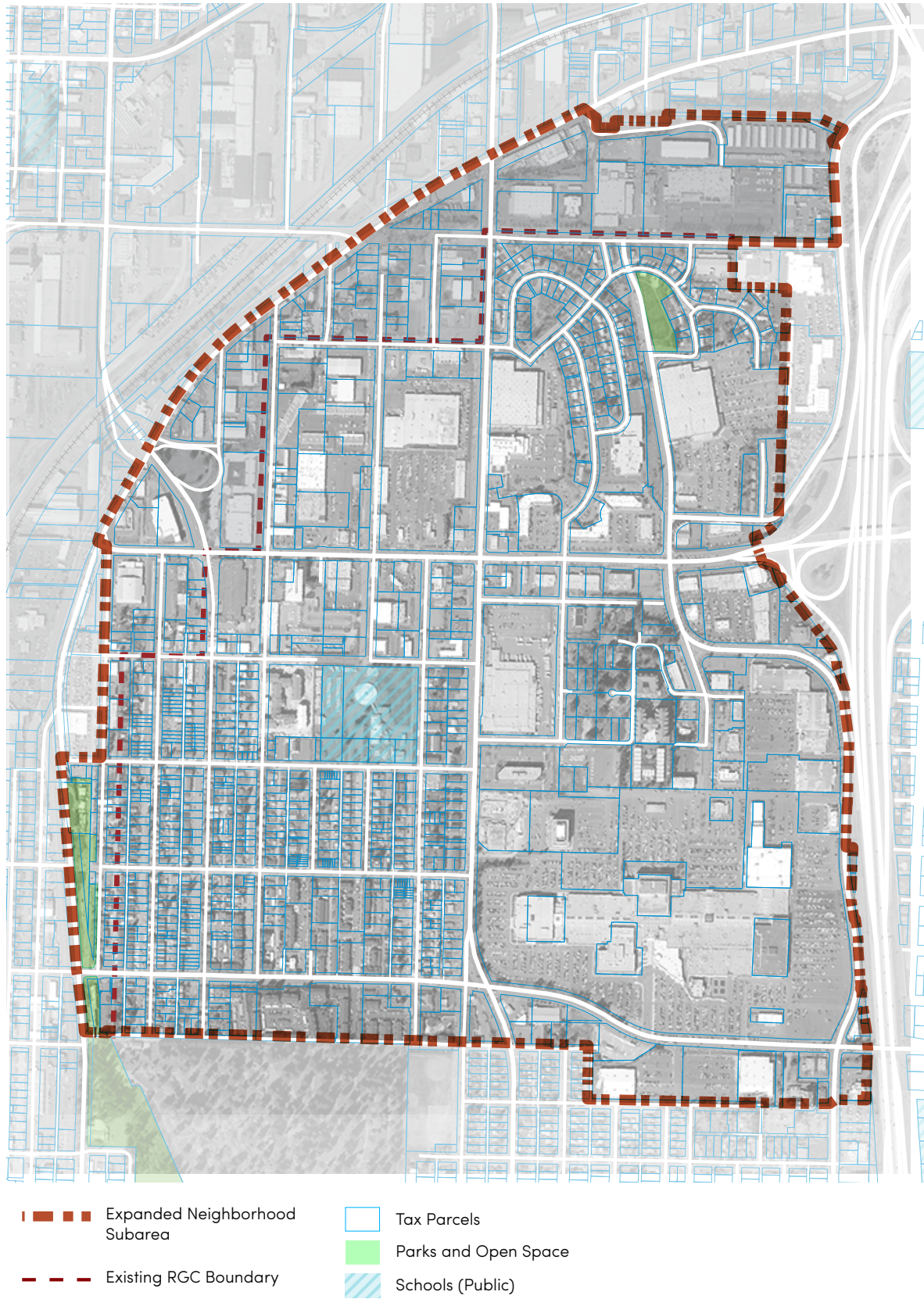


Figure 3.1.1. Existing parcel boundaries

Source: City of Tacoma, 2016; 3 Square Blocks, 2016

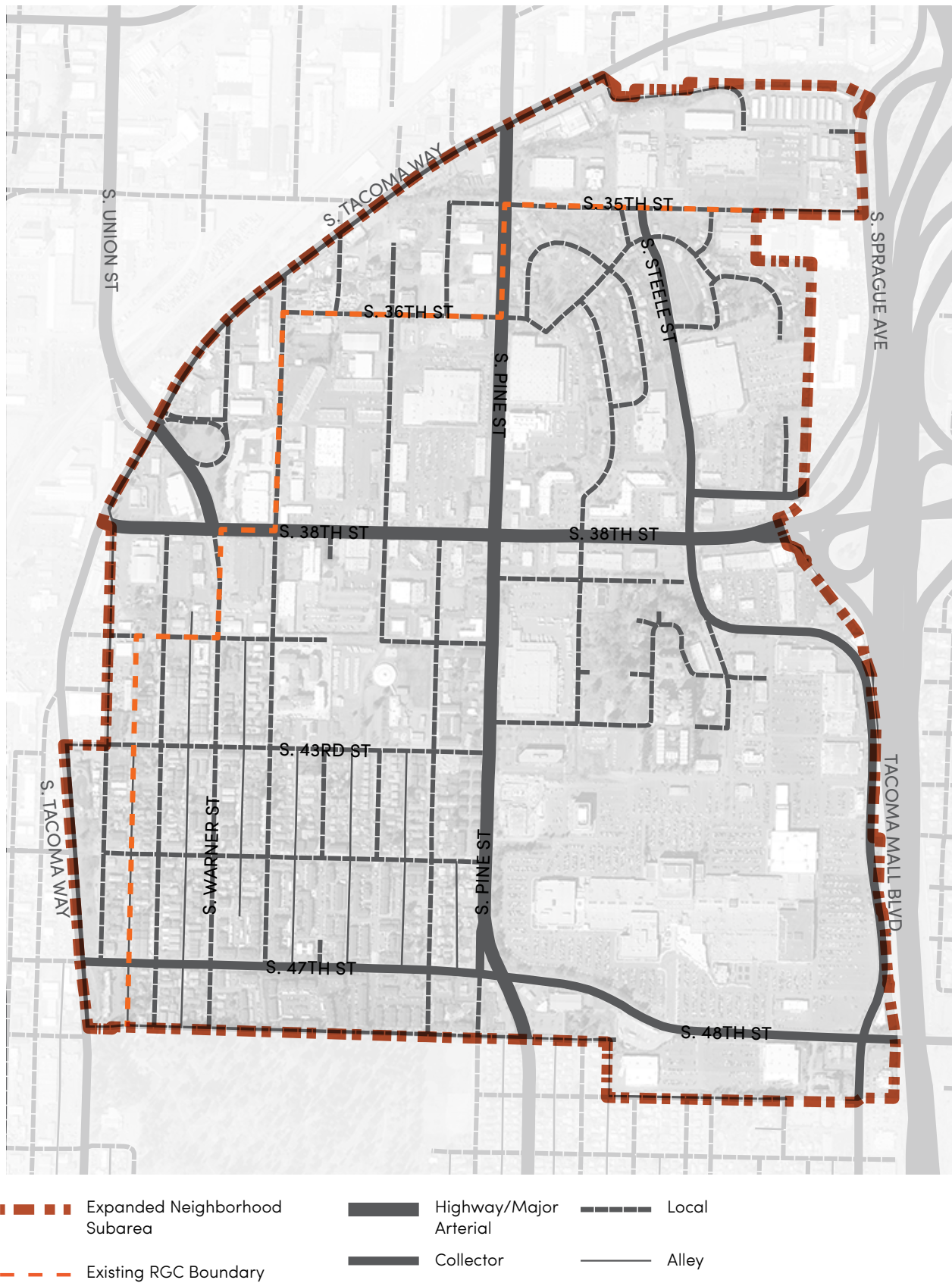


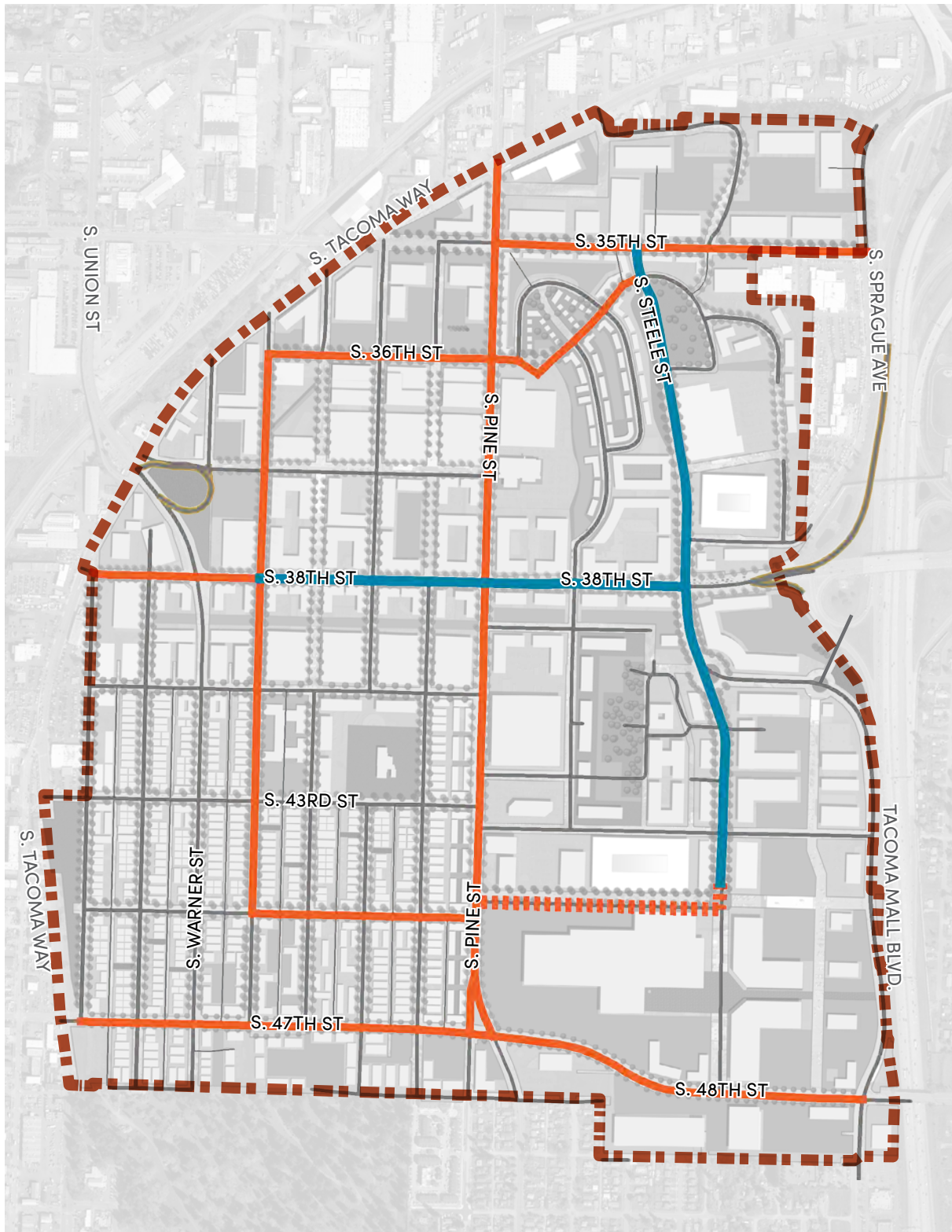
Figure 3.1.2. Existing street network

Source: City of Tacoma, 2016; 3 Square Blocks, 2016



Figure 3.1.3. Existing ground

Source: City of Tacoma, 2016; 3 Square Blocks, 2016



- Pedestrian Street
- Core Pedestrian Street

Figure 3.1.4. Proposed pedestrian streets

Source: City of Tacoma, 2016; 3 Square Blocks, 2016

CULTURAL RESOURCES

CHAPTER 3.5

TACOMA MALL NEIGHBORHOOD SUBAREA EIS



TACOMA MALL neighborhood

CHAPTER 3.5



CULTURAL RESOURCES

3.5.1 EXISTING CONDITIONS

HISTORY

The Tacoma Mall Neighborhood study area lies in the traditional territory of the Steilacoom and Puyallup Tribes, whose members are part of the larger Southern Coast Salish Lushootseed linguistic group (Suttles and Lane, 1990). Several permanent villages and place names along the marine shores of Tacoma and its waterways have been noted in the historical record.

Southern Coast Salish villages consisted of one or more plank houses with a few smaller structures. The Southern Coast Salish used canoes for transportation along waterways, with several designs made for specific transport needs. Despite Tacoma's shores and inland areas having experienced consistent use during the precontact period, no specific native places have been identified within the study area.

Early survey records indicate that the study area vicinity was originally swamp and prairie land (US Surveyor General, 1867). The earliest documented road was located approximately one mile north of the Tacoma Mall, running east/west from Commencement Bay (US Surveyor General, 1867). Land patent records indicate that Euro-American settlers started occupying the study area in the late 1800s, including George O. Kelly (US Department of the Interior Bureau of Land Management [BLM], 1874), Martin H. Smith (BLM, 1883), Cornelius Wing (BLM 1884), and Aaron G. Vradenburg (BLM, 1889).

Tacoma boomed in the 1870s and 1880s when it was selected as the western terminus of the Northern Pacific Railroad in 1873, followed by the completion of the transcontinental link in 1883. A bust came during the Panic of 1893, but the city rebounded in the early 1900s with its warehouses, lumber industry and grain terminals. A second slump hit Tacoma following World War I when there was a steep drop in the price of lumber. Again, the city persevered with the expansion of Camp Lewis (becoming Fort Lewis) and the defense build-up for World War II.

The study area experienced a housing boom starting in 1943 as soldiers returned from World War II. This, in concert with urban renewal, transformed the city. The addition of the Tacoma Narrows Bridge in 1950 and I-5 in 1965 made travel by car more convenient than by ferry and rail (Wilma and Crowley 2003). This new infrastructure also made it easier for families to travel farther out of their neighborhoods to shop for goods in centralized shopping areas. The Tacoma Mall was built in response to this opportunity in 1965. The Mall was designed by John Graham, Jr., who received international recognition for his large-scale shopping complexes. Graham was instrumental in conceiving the model for the suburban shopping center and the Tacoma Mall is the first ever large-scale, indoor suburban shopping complex. Graham is also famous for designing the Seattle Space Needle (MacIntosh 1998). Because of these factors, the Tacoma Mall is likely eligible for listing on the National Register.

PREVIOUSLY IDENTIFIED CULTURAL RESOURCES

Archival research shows only one nearby property as being listed on the Washington State Register and the National Historic Register—the Tacoma Mausoleum. This structure, located a half mile southwest of the Mall and constructed in the Beaux Arts style, was built in 1910 by architects George Gove and Silas Nelsen (Department of Archaeology and Historic Preservation [DAHP] 1981). Other nearby historic resources are the cemeteries situated three blocks southwest of the Mall—the 1875 Tacoma Cemetery (Department of Archaeological and Historic Preservation [DAHP] 2005), which contains many of the cities founding fathers, the 1885 Pauper Cemetery (DAHP 2008), and the 1874 Oakwood Hill Cemetery (DAHP 2005). None of these resources are listed on an historic register. The Tacoma Historic Register does not have any properties listed in the Mall vicinity or Tacoma Mall Neighborhood study area.



Photo 3.5.1. Griot's Garage



Photo 3.5.2. Madison School

The Washington State Department of Archaeology and Historic Preservation (DAHP) requires that historic property inventory forms be completed for all properties within a project area that are 50 years of age or older, and for larger scale projects, they recommend that a survey cut-off date of 40 years be implemented. Based on these guidelines, the Tacoma Mall itself qualifies as an historic property (having been built in 1965), and most of the homes in the study area, including in the Lincoln Heights residential neighborhood, meet the same requirements for recording. The same guidelines indicate that the Griot's Garage building (located at 3333 S. 38th St. and built in 1950) and the Madison School building (located at 3111 S. 43rd St. and built in 1955) may also qualify as historic properties.

As part of historic preservation efforts, a 2005 report on the South Tacoma and South End neighborhoods recommended identifying potential Historic Districts and mid-century resources in these areas, including the Tacoma Mall Neighborhood study area (Eysaman & Company 2005).

The study area has no known cultural or archaeological resources. An examination of DAHP’s predictive model, a tool used to calculate the probability of encountering precontact resources based on landform and proximity to known activity areas, indicates that there is a moderate to high risk for cultural resources within the study area. However, this model is only a “first step” in cultural resources investigations, and does not account for modern impacts such as urbanization, which would lower the risk of a project affecting intact cultural resources.



Figure 3.5.1. Tacoma Mall, Rendering of the Interior (1963–1964)

Source: Architecture Collection, Image Number PH Coll 339.A94a, University of Washington Libraries, Seattle.

IMPACTS OF ALTERNATIVES 1 (NO ACTION) AND 2 (ACTION ALTERNATIVE)

Alternative 1 (No Action) would maintain the existing RGC boundaries and growth targets, as well as the City’s current development regulations for the subarea. Alternative 2 (Action Alternative) proposes to expand the RGC boundaries, increase growth targets for the subarea to account for this expansion, and adopt and implement the Tacoma Mall Neighborhood Subarea Plan including changes to zoning and development regulations.

In addition to historically designated or eligible sites, landmarks are familiar and recognizable features of the neighborhood. One example is the characteristic Arby’s sign located on S. 38th St. shaped like a cowboy hat. These features may be valued by the community and contribute to a sense of neighborhood identity.

3.5.2 SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

No significant differences between the alternatives were identified with respect to potential cultural resource impacts and impacts discussed below are assumed common to both alternatives.

Preserving the historic, architectural, and aesthetic character and heritage of a neighborhood helps to provide a sense of place, pride and continuity. Connecting to the past can stabilize neighborhoods and help communities build healthy futures.

HISTORIC RESOURCES

As described above, the study area does not contain any historic resources listed on the Washington State Register, the National Historic Register or the Tacoma Historic Register. However, one listed property is located about a half mile from the study area and other historic resources are located in the vicinity of the study area. In addition, based on DAHP guidance, the Tacoma Mall, Groit’s Garage building, the Madison School building and many of the homes in the study area, including in the Lincoln Heights residential neighborhood, may qualify as historic properties. In recognition of these potential resources, a 2005 report on the South Tacoma and South End neighborhoods recommended identifying potential historic districts and mid-century resources in these areas, including the Tacoma Mall study area.

Both alternatives could potentially affect buildings identified as eligible for historic status. Impacts could include demolition, inappropriate rehabilitation and reuse, or changes in the physical context (i.e. new construction adjacent or across the street) as a result of development pressure that could damage integrity of individual buildings and the character of the street. Conversely, a more economically vibrant community could spur investment in character and historic properties and could advance historic designations among the apartment buildings in the study area to take advantage of rehabilitation tax incentives.

CULTURAL RESOURCES

As noted above, the study has no known cultural or archaeological resources, but DAHP’s predictive model indicates a moderate to high for cultural resources within the study area.

Archaeological resources could be encountered during any projects within the study area that involve ground disturbance. Ground disturbance may include trenching or building for infrastructure (water, sewer, power and telecom), transportation corridor construction and maintenance, building foundations, stormwater management, grading, filling and planting.

3.5.3 MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action

- Under both alternatives, the Tacoma *Comprehensive Plan Design and Development Element* includes Goal DD-

13: Protect and preserve Tacoma’s historic and cultural character. This goal is supported by ten policies intended to ensure that valuable historic and cultural resources are identified, protected and restored.

- Under both alternatives, Tacoma’s *Historic Preservation Plan*, adopted in 2011, contains goals, policies and actions that provide clear policy guidance for historic preservation and protection of cultural resources.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

- Under both alternatives, Tacoma Municipal Code Section 13.07, Landmarks and Historic Special Review Districts, states that the purpose of the City’s goals and responsibilities is to promote preservation, enhance awareness and protect the finite resources that define the community. It establishes criteria for the designation of buildings and districts, as well as policies and review procedures for their treatment.
- Under both alternatives, Tacoma Municipal Code Section 1.42 establishes the Landmarks Preservation Commission (LPC). The Commission reviews and approves applications for changes to registered landmarks and buildings within local historic districts, reviews nominations and advises City Council regarding additions to the Landmarks Register, and participates in the planning process.
- Under both alternatives, applicable state regulations include RCW Chapter 27.44 (Indian graves and records) and Chapter 27.53 (Archaeological sites and records). Development or uses that could impact these sites must comply with the State’s guidelines on archaeological excavation and removal as described in WAC 25–48.

OTHER MITIGATION

Any other mitigation not contained in the categories above

- Under Alternative 2, amend Tacoma Municipal Code Section 13.12.570 that sets forth provisions for addressing archaeological, cultural and historic resources in the Downtown Tacoma RGC to reflect adoption of the Subarea Plan and completion of this EIS.
- Under both alternatives, continue to evaluate opportunities for identifying and protecting cultural resources. Possible future actions, depending on community interests, include:
 - Provide funding for a comprehensive survey of study area buildings eligible for nomination to the Washington State Register, the National Historic Register or the Tacoma Historic Register.

- o In preparing design guidelines, consider how new development can complement and support historic character, context and general treatment of historic resources. Besides guidelines on scale, height, mass and materials of new and infill buildings, attention should be given to signage, accessibility issues, and appropriate seismic and energy retrofits in older buildings.
- o Consider the use of zoning incentives to protect and promote identified historic resources and conservation districts.
- o Actively seek partners to build a cultural resources information database to identify geographic areas with the highest probability for encountering significant resources.
- o Identify and seek partnerships with existing agencies or institutions with an interest in history and preservation.

3.5.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts to historic or cultural resources are anticipated under either alternative.

3.5.5 SOURCES

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TRANSPORTATION

CHAPTER 3.6



TRANSPORTATION

Complete Streets is a nationally recognized term referring to streets and sidewalks designed, operated and maintained to enable safe and convenient access and travel for all users—pedestrians, bicyclists, transit riders and people of all ages and abilities, as well as freight and motor vehicle drivers.

This section summarizes current and future transportation conditions in the Tacoma Mall Neighborhood study area. It describes characteristics for all modes of transportation, intermodal connections in the vicinity, and safety. The traffic operations section also covers level of service (LOS) for key intersections. Figure 3.6-1 shows the area included in the proposal together with the slightly larger area used in analyzing transportation impacts.

The impact analysis considers long-term changes in land use, the roadway network, nonmotorized systems, public transportation, parking and freight under action and no-action alternatives. It also identifies planned projects in the area's vicinity that could contribute to cumulative impacts if combined with impacts of the proposal. Potential mitigation activities to reduce those impacts are also described.

3.6.1 PLANS AND REGULATIONS

This section provides a brief overview of analysis methodology and regulatory context. The analysis of local traffic impacts was guided by policy direction established in plans and policy documents adopted by the City of Tacoma, WSDOT, Sound Transit and Pierce Transit. These include

- Puget Sound Regional Council (PSRC) Transportation 2040
- City of Tacoma Comprehensive Plan 2015
- City of Tacoma Transportation Master Plan (TMP) 2015
- City of Tacoma Six-Year Transportation Improvement Program 2016
- Pierce Transit Transit Development Plan: 2016–2021
- Pierce Transit Destination 2040 Long-Range Plan
- WSDOT Statewide Transportation Improvement Program 2016–2018
- City of Tacoma Complete Streets Design Guidelines 2009
- Sound Transit ST3 2016

ANALYSIS METHODOLOGY

Roadway conditions were evaluated using two metrics, intersection LOS and volume-to-capacity (V/C) ratios along roadway

segments. Roadway LOS is a measure of a transportation facility's operating performance. Traffic condition quality is evaluated as one of six LOS designations—A, B, C, D, E or F:

- A and B: minimal delay
- C and D moderate delay
- E traffic volume approaching capacity
- F congested conditions with demand exceeding capacity

Intersection LOS and segment V/C ratios are described in more detail below.

ROADWAY SEGMENT LEVEL OF SERVICE

The City of Tacoma adopted LOS standards in the Transportation Element of the Comprehensive Plan for areas within designated centers, including the Tacoma Mall Regional Growth Center (RGC). The standard is determined by the V/C ratio of arterial lane miles (ALMs), which is the ratio of peak-hour traffic volume to the segment's hourly capacity. Capacities are extracted from the City's travel demand model for each study segment. A ratio greater than 1.0 indicates that demand exceeds the roadway segment's capacity, resulting in congestion. The City's standard states that 85% of ALMs must have a V/C ratio no greater than 0.99. This equates to 85% or more of ALMs operating at LOS E or better.

INTERSECTION LEVEL OF SERVICE

Methods described in the *Highway Capacity Manual* (Transportation Research Board 2010) are used to calculate LOS for signalized and stop-controlled intersections as summarized in Table 3.6-1. Intersection LOS is determined by the average delay experienced by vehicles at the intersection. For stop-controlled intersections, LOS depends on the average delay experienced by drivers at stop-controlled approaches having the worst movement. Thus for two-way or T-intersections, LOS is based on the average delay experienced by vehicles entering the intersection on minor (stop-controlled) approaches. For all-way stop-controlled intersections, LOS is determined by the average delay for all movements through the intersection. The LOS criteria for stop-controlled intersections have different threshold values than those for signalized intersections, primarily because drivers expect different levels of performance from distinct types of transportation facilities. In general, stop-controlled intersections are expected to carry lower volumes of traffic than signalized intersections. Thus, less delay is expected at stop-controlled intersections than at signalized intersections for an equivalent LOS.

Table 3.6.1. Intersection Level of Service Criteria

Level of Service	Average Delay per Vehicle (seconds)	
	Signalized Intersection	Nonsignalized Intersection
A	≤ 10	≤ 10
B	> 10–20	> 10–15
C	> 20–35	> 15–25
D	> 35–55	> 25–35
E	> 55–80	> 35–50
F	> 80	> 50

Source: 2010 Highway Capacity Manual

For purposes of this study, intersection LOS E is assumed the standard for determining impacts. This is consistent with the roadway segment LOS standard but provides additional details about performance at key bottlenecks—something the roadway segment analysis does not identify. Pedestrian, bicycle, transit, parking and safety impacts are evaluated qualitatively. An evaluation of system completeness, Tacoma’s new concurrency measure, is also included. A technical memo with more details on analysis methodology may be found in Appendix D.

3.6.2 EXISTING CONDITIONS

This section summarizes operations in the transportation analysis area (TAA) for all modes of transportation, including information on safety and parking.

STREET NETWORK

Lying approximately two miles southwest of Downtown Tacoma, the Tacoma Mall Neighborhood is an important retail district within the City. The street grid in the TAA is generally characterized by long distances between through-streets (large blocks) and limited connections through the surrounding neighborhoods (Figure 3.6-1). Both attributes create bottlenecks for vehicles and make walking and biking trips more difficult because they increase trip distance and concentrate travel along high-traffic roads. Drivers tend to converge on a select few routes to reach their destinations, whether making

local or regional trips. These streets include S. Tacoma Way, S. Pine and S. Oakes Sts., Tacoma Mall Boulevard, S. 38th St., S. 47th/48th Sts. and S. 56th St. These arterials also serve as important walking and biking routes to and from the Mall because of limited street-network connectivity and barriers such as the Tacoma Mall and Tacoma Cemetery.

Another factor limiting pedestrian, biking, and transit travel is the dispersed land use pattern within the study area. Residential development consists primarily of medium-density residential with some higher-density development closer to the Mall itself. Single-family homes are common in the study area's southwest quadrant, and their relatively low density creates larger distances between travel origins and destinations that can be difficult to serve effectively with transit, walking or biking. The discontinuous street grid, dispersed land use pattern, and limited number and quality of pedestrian and bike facilities within the area contribute to low levels of walking, biking and transit and encourage travel by single-occupant vehicle.

MODE SHARE

In 2010, the Tacoma Mall RGC's commute-mode share was 83% single-occupancy vehicle (SOV), 8% high-occupancy vehicle (HOV), 4% walk and bicycle and 5% public transit (PSRC, 2010). These mode shares are comparable to the region-wide average and mode shares documented at the Northgate Mall, a subarea that was similar to the Tacoma Mall area but that has been transformed into a multimodal mixed-use densified area. Existing mode split data are shown in Figure 3.6.1.

2010 Mode Share

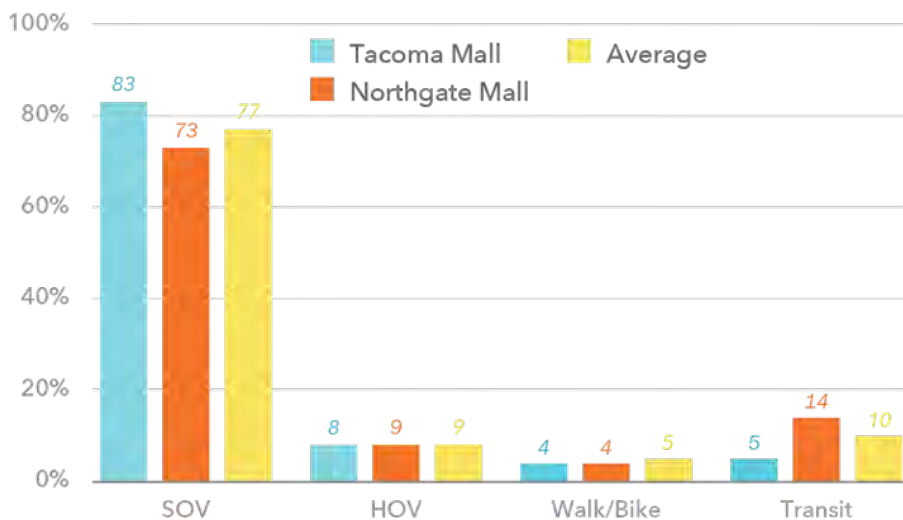


Figure 3.6.1. Existing mode share data, Tacoma and Northgate Malls

Source: Fehr & Peers, 2016

PEDESTRIAN CONDITIONS

Overall, sidewalk and crosswalk infrastructure is incomplete, with many existing facilities in need of maintenance and replacement (Figure 3.6-2). Less than half of sidewalks in the TAA were identified as being in good condition based on pavement wear. About a quarter of streets either have sidewalks in poor condition with severe cracking and heaving, or do not currently have sidewalks. Nearly all intersections have at least one light pole, whereas only 17 of 151 intersections evaluated have at least one marked crosswalk. The coarse street grid, curvilinear patterns such as those in Lincoln Heights, and barriers such as large parking lots and arterial streets make pedestrian mobility difficult.

The City of Tacoma TMP, adopted by the City Council in December 2015, identifies the entire TAA as a 20-minute neighborhood, meaning that it is within a 20-minute walk from the center of a designated Mixed-Use Center (MUC). The TMP recommends assessing pedestrian-facility quality on the presence or absence of sidewalks and the frequency of crosswalks, as summarized in Table 3.6-2. To meet an acceptable quality level, arterials and collectors should have complete sidewalks, and crosswalks should be present every 600 feet. As shown in Figure 3.6-2, no arterials (S Tacoma Way, S. Pine St./S Oakes St., Tacoma Mall Boulevard, S. 38th St., S. 47th/S 48th Sts., and S. 56th St.) and collectors (Puget Sound Ave., S. Cedar St., S. Sprague Ave., S. 35th St., and S. 36th St.) within the TAA meet this standard for both sidewalks and crosswalks. Within the TAA, only Puget Sound Ave., S. Sprague Ave., and S. 56th St. have complete sidewalks, and none of the arterials and collectors have crosswalks every 600 feet.

Table 3.6.2. Quality of Pedestrian Facilities

Facility Quality	Within 20-Minute Neighborhood	Other Elements
Sidewalks		
High	Complete sidewalks with buffers on both sides of arterials and collectors	Complete sidewalks on both sides of arterials and collectors
Acceptable	Complete sidewalks without buffers on both sides of arterials and collectors	Sidewalks present
Needs Improvement	Incomplete or no sidewalk	Incomplete or no sidewalk
Crosswalks		
High	Crossing every 300' in pedestrian activity area or downtown that meets Tacoma's current best design practice	Existing marked crossings meet Tacoma's current best design practice
Acceptable	Crosswalks present every 600'	Crosswalks present
Needs Improvement	No crosswalks within 600'	No crossings present

Source: City of Tacoma TMP, 2015

BICYCLE CONDITIONS

The TAA currently has two bicycle facilities. Each is a portion of the Historic Water Flume Line Trail—one an on-street bicycle lane on S. Tacoma Way and the other a stretch of shared-use path, as shown in Figure 3.6-3. Many through streets in the study area are arterials with high automobile volumes, high speeds, and few safe crossings, thus discouraging bicycling. The coarse grid, lack of facilities, and auto-oriented design of the Mall and some surrounding neighborhoods also contributes to the incomplete bicycle network.

PUBLIC TRANSPORTATION FACILITIES

Tacoma Mall is a major destination for bus public transit and an important intermodal station for regional travelers given its proximity to the South Tacoma Sounder Station and Tacoma Mall Transit Center. Eight Pierce Transit bus routes and one Intercity Transit weekend route serve the Tacoma Mall Transit Center and surrounding area. In addition, the South Tacoma Sounder Rail Station just south of the study area provides regional connections. Figure 3.6-4 shows existing transit routes and stops in the study area.

Pierce Transit bus routes serving the study area connect Tacoma Mall to all areas of the City and many surrounding jurisdictions. All routes operate all-day service (i.e., from 6:00 am to 10:00 pm on weekdays) with frequencies of 30 minutes or greater (Pierce Transit, 2016). The Intercity Transit 620 bus provides weekend service from Olympia to the Tacoma Mall Transit Center every 60–90 minutes. Stop density in the area is relatively high, with stops every one to two blocks on transit corridors. The transit corridors themselves are spaced approximately a half-mile apart, allowing riders to access a bus stop within a quarter-mile or less. All but one stop have accessible boarding areas for persons with disabilities.¹ Approximately half the stops that meet Pierce Transit’s ridership thresholds for benches and shelters have these amenities.

One challenge for transit riders in the study area is bus frequency. Routes serving the area currently have frequencies, or “headways,” of 30 minutes or more, often leading to long wait times for riders. No express transit service to Seattle currently exists. Access to transit can also be a barrier to some transit riders, as many streets have no sidewalks/crosswalks, or they are inadequate. The Tacoma Mall Transit Center, although located along S. 47th St. near the Tacoma Mall, is at the

¹ The South Tacoma Way and South 54th St. stop is not accessible for people with disabilities.

Subarea’s edge and some distance from many higher-density residential areas.

TRANSIT LOAD FACTORS

Transit load factors assess how many people use the bus and whether overcrowding occurs. The load factor is the ratio of passengers to seats. For example, a load factor of 0.5 indicates that half the seats are occupied, whereas a load factor greater than 1.0 indicates that some passengers are standing. Pierce Transit’s maximum acceptable load factor is 1.5.

Table 3.6-3 summarizes load factors during the peak periods of 6–9 a.m. and 3–6 p.m. for Pierce Transit’s eight bus routes and Intercity Transit’s one bus route operating within the TAA. The load factors range from approximately 0.3 to 0.5, indicating that during peak hours, buses are operating with less than half their seats full on average. This range is an average for all hours, however, and may obscure brief periods with heavy ridership. The load factor for Route 57, which serves the Tacoma Mall, is actually higher during periods outside those indicated above, as its peak periods occur at times different from those of typical commutes. The 0.35 load factor shown in the table represents the typical peak hour, whereas the route experiences a 0.46 load factor during midday.

Table 3.6.3. Transit Routes and Load Factors (a.m./p.m. peaks)

Route	Destination	Load Factor
3	Lakewood–Tacoma	0.49
52	TCC–Tacoma Mall	0.40
53	University Place	0.47
54	S 38th St	0.29
55	Tacoma Mall–Parkland	0.35
56	S 56th St	0.43
57	Tacoma Mall	0.35
300	S Tacoma Way	0.29
620	Olympia/Lacey–Tacoma Mall*	0.33

*Intercity Transit operates this route Saturday and Sunday only.

Source: Fehr & Peers, 2016.

FREIGHT

Figure 3.6-5 shows the Freight Priority Network identified by the adopted Tacoma TMP within the TAA. Three facilities designated as part of the Freight Priority Network border the TAA: S. Tacoma Way on the north and west, S. 56th St. on the south and Interstate 5 (I-5) on the area's eastern edge. The truck percentage on S. Tacoma Way ranges from 7% to 11%, demonstrating substantial freight demand along the corridor. South 38th and S. Pine Sts. also serve freight, and S. 38th St. is a key access route to the Nalley Valley, an established industrial area.

TRAFFIC OPERATIONS

Figure 3.6-6 shows study area intersections where LOS was evaluated as described in the methodology section. Existing intersection peak hour turning movement counts were collected on June 9, 2015 when school was in session. Vehicle volumes were highest between 4:00 p.m. and 5:00 p.m., and that period was determined as the p.m. peak hour for analysis. Other times of day can also experience high vehicle volumes, such as lunch hour when people visit the Tacoma Mall. Streets that provide connections to I-5 and State Route 16 experience high vehicle volumes during the morning and evening peak periods because motorists use the freeways to travel to other destinations in the region.

Table 3.6-4 and Figure 3.6-7 show intersection-level vehicle delay and LOS for the p.m. peak hour. One intersection, S. Fife and S. 38 operates at LOS F, below the City's standard, during the weekday p.m. peak hour: S. Fife and S. 38th Sts. Because this intersection has side street stop control, that level of delay is experienced by a relatively low share of motorists on the minor roadway (S Fife St.) rather than motorists on the S. 38th St. arterial. The remaining study intersections operate at LOS E or better during the weekday p.m. peak hour.

SEGMENT VOLUME-TO-CAPACITY RATIOS

Figure 3.6-8 presents corridor V/C ratios within the study area based on weekday p.m. peak-hour traffic volumes. All roadway segments operate at LOS E or better, exceeding the City standard of 85%. Only two arterial segments currently operate below LOS C: southbound S. Oakes St. between S. 47th and S. 56th Sts. at LOS E; and S. 38th St. eastbound from S. Steele St. to the I-5 northbound on-ramp at LOS D.

Table 3.6.4. Existing Intersection Level of Service

ID	Intersection	Control Type	LOS	Delay (sec/veh)
1	S Pine St.& S. Tacoma Way	Signal	C	23
2	S Tacoma Way & S. 35th St	Signal	A	4
3	S Lawrence St.& S. Tacoma Way	Side St. Stop ¹	B	12
4	S Pine St.& S. 36th St	Signal	A	6
5	S Tacoma Way & S. 38th St	Signal	A	9
6	S Warner St./ S. Union Ave & S. 38th St	Signal	B	18
7	S Lawrence St.& S. 38th St	Signal	B	11
8	S Cedar St.& S. 38th St	Signal	B	14
9	S Pine St.& S. 38th St	Signal	D	42
10	S Fife St.& S. 38th St	Side St. Stop ¹	F	74
11	S Steele St.& S. 38th St	Signal	E	64
12	I-5 NB On-Ramp & S. 38th St	Signal	A	8
13	S Steele St.& Tacoma Mall Blvd	Signal	B	19
14	S Tacoma Way & S. Washington St./ S. 41st St	Signal	B	16
15	S Pine St.& S. 42nd St	Side St. Stop ¹	C	19
16	S Pine St.& S. 45th St	Signal	B	13
17	S Tacoma Way & S. 47th St	Signal	B	13
18	S Lawrence St.& S. 47th St	Side St. Stop ¹	C	16
19	S Oakes St.& S. 47th St	Signal	C	26
20	Tacoma Mall Blvd & S. 48th St	Signal	B	19
21	S Lawrence St.& S. 56th St	Side St. Stop ¹	D	32

1. LOS for side street stop-controlled intersections is based on the leg with longest delay— i.e. the minor street with stop sign control.

Source: Fehr & Peers, 2016.

SAFETY

Safety was evaluated using data collected from 2010 to 2014 from the Washington State Department of Transportation. Figure 3.6-9 lists all injury and noninjury crashes that occurred within the TAA during the five-year period, as well as the five intersections having the most injury collisions. No fatalities occurred within the TAA during the period. Collisions were concentrated mostly on arterials and collectors such as S. 38th St. between S. Cedar and S. Fife Sts., Tacoma Mall Boulevard between S. 48th and S. 54th Sts., and S. 48th St. between S. Pine St. and Tacoma Mall Boulevard. The intersections with the most injury collisions were

- S 48th St. and Tacoma Mall Boulevard (19 injury collisions)
- S 56th St. and S. Puget Sound Ave. (14)
- S 56th and S. Oakes Sts. (13)
- S 43rd and S. Steele Sts. (12)
- S 38th and S. Pine Sts. (12)

As shown in Figure 3.6-10, there were three bicycle collisions and 24 pedestrian collisions reported between 2010 and 2014. Nearly all pedestrian and bicycle collisions occurred along arterial streets in the area. South 56th and S. 47th/48th Sts. had the most pedestrian collisions with seven and five, respectively.

The City of Tacoma completed a safety evaluation of the study area in fall 2016 that found conditions including high speeds along several corridors, limited intersection lighting, crossing facilities that do not meet ADA standards, faded and missing pavement markings and sight distance obstructions. A variety of countermeasures are included to improve safety for all modes—for example, access management, traffic calming treatments, and improved pedestrian and bicycle facilities. Many of these are incorporated into the proposed Subarea Plan. The full report is included in Appendix E.

PARKING

Parking supply in the Tacoma Mall area comprises off-street surface lots, on-street spaces, and one small parking structure at the Mall—area-wide parking appears adequate to meet demand. Some incidents of semi-type trucks parking in neighborhoods have been reported. This undesired activity is managed on a report basis and at times results in new on-street parking controls.

Parking resource management is vital to the success of many businesses and retailers and can help reduce the need for additional parking capacity. Transportation demand management is one tool shown to be effective in the management of

Transportation Demand Management

describes a set of strategies intended to reduce the demand for travel by single occupancy vehicles. Examples of TDM measures include transit pass subsidies and incentives, flexible work schedules, parking management and others.

parking. The goal of Tacoma’s parking system is to maximize use of the right-of-way while encouraging behavior consistent with the priority user of each district or area. For example, the parking priority users in downtown are customers, clients and visitors. Tacoma currently manages short-term on-street parking supply using various tools to influence desired parking behaviors.

In areas immediately outside the downtown core, such as the Tacoma Mall area, parking is almost entirely managed with time restrictions and enforcement patrol. Parking spaces throughout the system are managed on a first-come, first-served basis. The City allows certain uses by parking permits. Parking with access to the Tacoma Mall is free with unlimited duration.

Impacts of Alternatives 1 (No Action) and 2 (Action Alternative)

Alternative 1 (No Action) would maintain the existing RGC boundaries and growth targets, as well as the City’s current development regulations for the subarea. Alternative 2 (Action Alternative) proposes to expand the RGC boundaries, increase growth targets for the subarea to account for this expansion, and to adopt and implement the Tacoma Mall Neighborhood Subarea Plan including changes to zoning and development regulations.

3.6.3 SIGNIFICANT IMPACTS

The future year analysis was completed for a horizon year of 2040. The roadway network assumed differs between alternatives. Alternative 1 includes the Tier 1² projects identified in the TMP, and Alternative 2 includes additional local projects identified in the Subarea Plan. Key elements of the proposal included in Alternative 2 and not included in Alternative 1 are listed below:

- S 35th St. connection to S. Tacoma Way, including bike improvements
- Loop road connecting the four quadrants
- I-5 direct access ramp onto Tacoma Mall Boulevard for southbound vehicles
- area-wide street grid connections
- area-wide sidewalk gap connections
- The City is proactively planning for potential rail, streetcar, or other High-Capacity Transit (HCT) projects, including investing in transit-supportive technology or infrastructure, such as relocating the transit center to a more central location, adding signal-priority intersections and dedicated rights-of-way, and business access and transit (BAT) lanes, to lay the groundwork for future HCT corridor projects by either Sound Transit or Pierce Transit.
- Transportation investments recommended in the Subarea Plan give precedence to pedestrians throughout the area. New roadways will include pedestrian facilities, while sidewalks in poor condition or missing altogether will be replaced with facilities designed to current City standards. This will usually take place within larger transportation projects.

² The TMP defines Tier 1 projects as those that fall within the fiscally constrained 25-year scenario.

FORECASTING METHODOLOGY

This evaluation used the City of Tacoma's travel demand model and the PSRC 2040 regional model to forecast future travel demand for each alternative. The travel forecasts are estimates of trip volumes and travel modes under each alternative. Land uses assumed for each alternative are described in Chapter 2. The roadway network of each model reflects the assumptions summarized in the previous section.

For existing conditions, Alternative 1 and Alternative 2 mode share was estimated using an enhanced trip generation tool called MainStreet.³ MainStreet integrates traditional trip-generation methods with modern knowledge and current practices to more accurately estimate vehicle trips and modes. The tool accounts for unique environmental characteristics of the project site including demographics, land-use diversity, transit access, and intersection density. MainStreet is sensitive to higher densities, unique demographics, higher transit levels, and a well-developed pedestrian system. Factors that differentiate Alternatives 1 and 2 were input to determine changes in mode share. The MainStreet MXD calculation worksheet can be found in Appendix F.

IMPACTS COMMON TO BOTH ALTERNATIVES

While new development in the Mall Neighborhood is expected to continue to provide off-street parking, increased densities tend to result in parking fees that could cause spillover parking demand into adjacent neighborhoods. Alternative 2 includes the addition of new streets, some of which would provide on-street parking. This new supply is likely to outweigh any loss in parking availability caused by modifications to existing roadway cross-sections. Under both scenarios, more active parking management and control techniques may be required in order to maintain reasonable on-street parking availability throughout the study area. Figure 3.6-11 presents the Parking Management Toolbox included in the City of Tacoma's TMP. If parking demand exceeds the City's 85% target, the City may employ some strategies described below. Because the City would actively manage parking demand using the strategies shown in Figure 3.6-11 and described in the Subarea Plan, no impacts to parking are projected for either alternative.

³ Formerly called MXD

ALTERNATIVE 1 (NO ACTION)

Thresholds of Significance

Analytical results of the No Action Alternative are summarized in this section. Future deficiencies in the City's roadway LOS standards are defined if the No Action Alternative would:

- cause an intersection to operate below the City's LOS E standard
- cause less than 85% of ALMs to operate with V/C ratios less than 0.99

Roadway LOS Results

Roadway operations affect autos, freight and transit because they travel on the same facilities throughout the study area. Table 3.6-5 summarizes intersection LOS results for Alternative 1 compared with existing conditions. This represents the change in operations within the TAA if the Subarea Plan is not implemented. The following intersections have a forecast LOS of F:

- S Lawrence St. and S. Tacoma Way
- S Fife and S. 38th Sts.
- S Steele and S. 38th Sts.
- S Pine and S. 42nd Sts.

The intersections at S. Lawrence/S Tacoma Way, S. Fife/S 38th Sts., and S. Pine/S 42nd Sts. are all side-street stop intersections. For side-street stop intersections, delay and LOS are calculated for the minor-street approach. In all cases, heavy cross traffic on the main arterial causes long side-street delays. The S. Steele/S 38th St. intersection is the busiest in the study area and is particularly congested during the p.m. peak hour. This high volume along with relatively inefficient north-south split-signal phasing results in LOS F operations at this intersection.

The city requires 85% of all segment V/C miles to be at or better than LOS E. Despite the congested intersections described above, 97% of ALMs in alternative 1 meet that threshold. Appendix G shows V/C calculations.

Pedestrian System

Pedestrian trips are expected to increase from growth set to occur between 2017 and 2040 under Alternative 1 conditions. While new development will likely provide sidewalks to match current City standards where gaps exist, no City projects have been committed to address the lack of pedestrian facilities within the study area under this alternative; therefore, a pedestrian system deficiency is identified for Alternative 1, indicating that the pedestrian environment will not meet city standards under this scenario.

Table 3.6.5. Intersection Level of Service, Alternative 1 (2040)

ID	Intersection	Control Type	Existing		Alternative 1 (No Action)	
			LOS	Delay (s/veh)	LOS	Delay (s/veh)
1	S Pine St.& S. Tacoma Way	Signal	C	23	E	60
2	S Tacoma Way & S. 35th St	Signal	A	4	B	15
3	S Lawrence St.& S. Tacoma Way	Side St. Stop ¹	B	12	F	96
4	S Pine St.& S. 36th St	Signal	A	6	B	12
5	S Tacoma Way & S. 38th St	Signal	A	9	D	45
6	S Warner St./ S. Union Ave & S. 38th St	Signal	B	18	C	22
7	S Lawrence St.& S. 38th St	Signal	B	11	C	33
8	S Cedar St.& S. 38th St	Signal	B	14	A	10
9	S Pine St.& S. 38th St	Signal	D	42	E	59
10	S Fife St.& S. 38th St	Side St. Stop ¹	F	74	F	>150
11	S Steele St.& S. 38th St	Signal	E	64	F	144
12	I-5 NB On-Ramp & S. 38th St	Signal	A	8	B	13
13	S Steele St.& Tacoma Mall Blvd	Signal	B	19	B	16
14	S Tacoma Way & S. Washington St./ S. 41st St	Signal	B	16	C	26
15	S Pine St.& S. 42nd St	Side St. Stop ¹	C	19	F	>150
16	S Pine St.& S. 45th St	Signal	B	13	B	16
17	S Tacoma Way & S. 47th St	Signal	B	13	B	12
18	S Lawrence St.& S. 47th St	Side St. Stop ¹	C	16	C	21
19	S Oakes St.& S. 47th St	Signal	C	26	C	32
20	Tacoma Mall Blvd & S. 48th St	Signal	B	19	D	43
21	S Lawrence St.& S. 56th St	Side St. Stop ¹	D	32	D	41

1. LOS for Side St. stop-controlled intersections is based on the leg with highest delay, i.e. the minor street with the stop sign control.

Source: Fehr & Peers, 2016.

Bicycle System

Bicycle trips are expected to increase from growth set to occur between 2017 and 2040. Bicycle routes in the TMP could be implemented during this period, but future design details would need to be identified prior to bicycle project implementation. The TMP identifies a reasonable set of bicycle improvements that could be in place by 2040 to provide general access to the Tacoma Mall Subarea. However, no provision has been made for a bicycle network to facilitate bicycle travel within the subarea. Based on the lack of internal bicycle infrastructure, a future bicycle travel deficiency is identified for Alternative 1.

Safety

Vehicle trips would increase from expected growth within the Tacoma Mall subarea and beyond; therefore, an increase in collisions compared with existing conditions is expected. However, increased collision rates are not indicated, and therefore no deficiency is identified for Alternative 1.

ALTERNATIVE 2

This section describes anticipated transportation impacts under Alternative 2.

Thresholds of Significance

The No Action Alternative serves as the baseline for identifying impacts to transportation facilities caused by the action alternative. The No Action baseline is the most common way to assess potential impacts that could result from implementing a plan like the Tacoma Mall Neighborhood Subarea Plan. A significant transportation impact is identified if Alternative 2 would

- cause an intersection that meets the City's LOS E standard under the No Action Alternative to deteriorate to LOS F
- cause at least one additional second of delay to an intersection that operates at LOS F under the No Action Alternative
- cause the percentage of ALMs operating at V/C ratios less than 0.99 to fall below 85% and be at least one percentage point lower than that of the No Action Alternative

Roadway LOS Results

Table 3.6-6 summarizes intersection LOS results for Alternative 2 compared with the No Action Alternative. These results reflect conditions for autos, freight and transit.

One intersection, S. Lawrence St./S Tacoma Way, is expected to operate at LOS F under Alternative 2. The LOS F condition expected at that intersection is due to long delays on stop-controlled S. Lawrence St. Although the volume of

affected vehicles is very low, it is higher than with Alternative 1 (15 versus 10 vehicles per hour); therefore, this intersection is considered to have an adverse impact under Alternative 2.

The other LOS F intersections identified in Alternative 1 have substantially improved operations under Alternative 2 because of traffic congestion and access improvement projects incorporated into the plan. These projects are summarized in Table 3.6-7.

Two key projects could result in improved overall traffic LOS within the study area. The first is the Loop Road, which redistributes some traffic that will result from redevelopment away from the congested S. Pine/S 38th St. corridors. Additionally, the I-5 direct access ramp alters travel patterns and allows vehicles to bypass the S. Steele/S. 38th St. intersection, substantially reducing congestion at the intersection and the potential for vehicle queues to extend onto I-5 from the S. 38th St. off-ramp.

Implementing major projects like the Loop Road and the I-5 direct access ramp would require substantial funding commitments and long lead times. Further, the I-5 direct access ramp proposal must be vetted through WSDOT's Interchange Justification Report process. The project team prepared a threshold analysis to determine how much of Alternative 2's proposed development could be accommodated before these key projects (or another congestion relief project with a similar expected outcome) would be needed. The analysis focused on the intersection of S. Steele/S 38th Sts. because it is the most congested of those in the study area. The threshold analysis indicates that 52% of the Tacoma Mall Subarea Plan's proposed development could be accommodated before the intersection LOS at S. Steele/S 38th Sts. would deteriorate to LOS F conditions. This 52% portion translates into roughly 5,570 new p.m. peak-hour trips. If the direct access ramp or another traffic congestion relief project for the intersection cannot be implemented concurrent with 52% build-out of the Tacoma Mall Neighborhood Subarea, a new environmental review would be required before permitting further development.

The roadway segment analysis indicates that Alternative 2 results in 97% of ALMs operating at LOS E or better, exceeding the City threshold of 85%. Appendix G shows V/C calculations.

Table 3.6-8 shows changes in mode share between scenarios. Note the large decrease in SOV trip mode share between Existing Conditions and both Alternatives 1 and 2. This reduction in SOV trip generation is related to the increased land use density and mix of uses expected in the Mall Neighborhood by 2040 and reflects the Mall Neighborhood's RGC designation under both scenarios.

Table 3.6.6. Intersection Level of Service, Alternative 2 (2040)

ID	Intersection	Control Type	Alternative 1 (No Action)		Alternative 2	
			LOS	Delay (s/veh)	LOS	Delay (s/veh)
1	S Pine St.& S. Tacoma Way	Signal	E	60	E	60
2	S Tacoma Way & S. 35th St	Signal	B	15	B	16
3	S Lawrence St.& S. Tacoma Way	Side St. Stop ¹	F	96	F	>150
4	S Pine St.& S. 36th St	Signal	B	12	B	14
5	S Tacoma Way & S. 38th St	Signal	D	45	C	30
6	S Warner St./ S. Union Ave & S. 38th St	Signal	C	22	C	24
7	S Lawrence St.& S. 38th St	Signal	C	33	D	49
8	S Cedar St.& S. 38th St	Signal	A	10	B	11
9	S Pine St.& S. 38th St	Signal	E	59	D	49
10	S Fife St.& S. 38th St	Side St. Stop ¹	F	>150	C	21
11	S Steele St.& S. 38th St	Signal	F	144	D	38
12	I-5 NB On-Ramp & S. 38th St	Signal	B	13	B	13
13	S Steele St.& Tacoma Mall Blvd	Signal	B	16	C	22
14	S Tacoma Way & S. Washington St./ S. 41st St	Signal	C	26	C	26
15	S Pine St.& S. 42nd St	Side St. Stop ¹	F	>150	D	26
16	S Pine St.& S. 45th St	Signal	B	16	D	46
17	S Tacoma Way & S. 47th St	Signal	B	12	B	13
18	S Lawrence St.& S. 47th St	Side St. Stop ¹	C	21	B	14
19	S Oakes St.& S. 47th St	Signal	C	32	D	43
20	Tacoma Mall Blvd & S. 48th St	Signal	D	43	D	43
21	S Lawrence St.& S. 56th St	Side St. Stop ¹	D	41	D	33

LOS for Side St. stop-controlled intersections based on leg with longest delay; i.e., minor street with stop sign control.

Source: Fehr & Peers, 2016

Table 3.6.7. Proposed Improvements to LOS F Intersections, Alternative 2

Intersection	Alt. 1 LOS	Alt. 2 LOS	Proposed Improvements
S Fife St/S 38th St	F	C	Signalization
S Steele St/S 38th St	F	D	Alter signal timing to remove split phase. Revise lane assignments for north and south approaches.
S Pine St/S 42nd St	F	D	Signalization

Source: Fehr & Peers, 2016

The additional decrease in SOV trips under Alternative 2 is a direct result of the improved transportation system and additional land use refinements that lead to higher incidence of HOV, bike and transit trips. The network is better equipped to handle this mode shift with the improvements delineated in the project list. It should be noted that the Subarea Plan (Alternative 2) is explicitly intended to catalyze growth and development while contributing to regional efforts to bend regional growth trends by attracting and concentrating a larger share of overall growth within RGCs. While the distinctions between Alternatives 1 and 2 may not seem striking, it is safe to state that actual growth is much more likely to meet plan targets with implementation of the catalytic actions laid out in the Subarea Plan than it is under No Action Alternative 1.

Table 3.6.8. Mode Share (%)

Alternative	SOV	HOV	Walk/ Bike	Transit	Internal Vehicle Trips*
Existing	72%	8%	4%	5%	11%
Alternative 1	57%	8%	11%	8%	16%
Alternative 2	52%	9%	12%	9%	18%

* Internal vehicle trips include a mix of SOV and HOV trips. They are relatively short trips that stay within the subarea.

Source: Fehr & Peers, 2016

Pedestrian System

A safe and well-connected pedestrian network is important in order to encourage people to walk to nearby designations and services, thereby increasing physical activity and fostering social interaction. Pedestrian deficiencies are addressed through the project list. By connecting the sidewalk system as well as addressing gaps and substandard conditions, pedestrians will have a more complete system to use in Alternative 2.

Sidewalks will be maintained or replaced throughout the neighborhood depending on walkway conditions and in accordance with street typologies. Sidewalks will be: expanded from the curb and furnished with street trees along connector streets; installed at rights-of-way edges and furnished with street trees on urban residential streets; and installed on rights-of-way edges and furnished with bulbouts or rain gardens, where feasible, as recommended by the Tacoma Complete Streets Design Guidelines.

Improvements to the pedestrian network proposed under Alternative 2 are expected to accommodate the associated growth in pedestrian trips; therefore, no impact to the pedestrian system is expected under Alternative 2.

Bicycle System

Bicycle corridors are being added in Alternative 2, specifically on S. 35th St., S. 38th St., S. 47th St., Sprague Ave., Warner St., 40th St., and the connection from S. Fife St. to S. 48th St. The loop road will also have bicycle facilities (bike lanes, sharrows, shared-use paths, etc.), and the complete streets will be bicycle friendly. Improvements to the bicycle network proposed under Alternative 2 are expected to accommodate the associated growth in bicycle trips; therefore, no impact to the bicycle system is expected under Alternative 2.

Safety

The infrastructure projects proposed under Alternative 2 would result in improved access management and fewer uncontrolled left turns. This is expected to result in a decreased collision rate compared with Alternative 1. Moreover, speeds may decrease, as grid network roadways will tend to have fewer lanes and visual narrowing effects resulting from landscaping and other treatments. Lower speeds would also reduce crash severity; therefore, Alternative 2 is not expected to result in a safety impact.

CONCURRENCY

This EIS considers two methodologies in evaluating concurrency. The first is roadway segment LOS, measured as the percentage of ALMs operating at LOS E or better. The second is system completeness, a multimodal metric recently adopted by the City of Tacoma. The underlying policy is that the City will build the transportation system defined in the TMP at a rate equal to or ahead of the pace of development during the planning horizon. This is determined by comparing the progress of development and infrastructure completion as they relate to the City's 2040 goals.

ROADWAY SEGMENT LEVEL OF SERVICE

As described in the Impacts section, both Alternatives 1 and 2 are expected to result in 97% of ALMs operating at LOS E or better; therefore, both alternatives exceed the City's 85% threshold and meet concurrency.

SYSTEM COMPLETENESS

The progress of development and infrastructure completion is compared below:

- Development completion: development in the Tacoma Mall subarea proposed by the Subarea Plan compared with that proposed for the area by 2040 in the TMP.
- Infrastructure completion: dollar amount of projects to be completed under the Subarea Plan compared with that of the TMP 25-year project list. Only projects serving

the Tacoma Mall subarea are considered. This measure considers all types of projects, including those benefitting autos, freight, pedestrians, bicycles and transit.

Because Alternative 1 is consistent with the TMP in terms of both land use and Tier 1 project assumptions, it is by definition concurrent. Alternative 2 would include an additional 404 housing units and 830 jobs in the Tacoma Mall subarea, a small fraction compared with the 127,000 new residents and 97,000 new jobs planned citywide in the TMP. The TMP includes projects totaling \$399 million citywide; the Subarea Plan proposes additional projects totaling \$145 million,⁴ roughly 36% greater than the total for the TMP project list; therefore, the Subarea Plan would meet the City’s concurrency requirement.

IMPACT SUMMARY

The following table summarizes the impacts identified for each alternative. As shown below, Alternative 1 is expected to have deficiencies related to intersection operations, the pedestrian system, and the bicycle system. Alternative 2 generally incorporates transportation projects that better accommodate land use growth projected for the study area; however, this alternative is expected to have one intersection LOS impact.

Table 3.6.9. Summary of Impacts

Impact	Alternative 1	Alternative 2
Intersection LOS	Deficiency: four intersections	Impact: one intersection
Roadway LOS	—	—
Pedestrian System	Deficiency	—
Bicycle System	Deficiency	—
Safety	—	—
Parking	—	—

Source: Fehr & Peers, 2016.

3.6.4 MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action

- For both alternatives, the City of Tacoma TMP and Transportation Element of the Comprehensive Plan identifies

⁴ TMP Tier 1 projects that also appear on the Subarea Plan list are omitted from this total.

recommended transportation improvement projects and policy guidance to promote multimodal mobility and safety.

- For both alternatives, the City of Tacoma Complete Street Guidelines provides guidance for the development of streets to enable safe and convenient access and travel for all modes of travel.
- Under Alternative 2, City of Tacoma Draft Tacoma Mall Neighborhood Subarea Plan, if adopted, would provide guidance for enhancements beyond those provided in the TMP, including increased connectivity, greater bicycle and pedestrian mobility, improved access to transit and improved vehicular traffic flow.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

- Under Alternative 2, Tacoma Municipal Code Section 13.12.580—Traffic Impact Assessment—should be amended to apply to the Tacoma Mall Neighborhood, allowing an expedited assessment of transportation impacts and mitigation to address safety, circulation, and capacity issues.
- For both alternatives, Tacoma Municipal Code Section 13.15—Commute Trip Reduction helps to reduce peak hour congestion.
- For both alternatives, Tacoma Municipal Code Section 13.16—Concurrency Management System ensures that transportation improvements that address the impacts of development are provided concurrent with the development.

OTHER MITIGATION

Any other mitigation not contained in the categories above

- Under Alternative 2, operations at S. Lawrence St/S Tacoma Way should be monitored and access restrictions should be considered if long delays materialize. For example, S. Lawrence St. could be restricted to right-in–right-out operations at this intersection.

3.6.5 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The mitigation measures recommended for the S. Lawrence St/S Tacoma Way intersection are expected to reduce the impact to a less than significant level; therefore, no significant unavoidable adverse impacts to transportation and parking are expected.

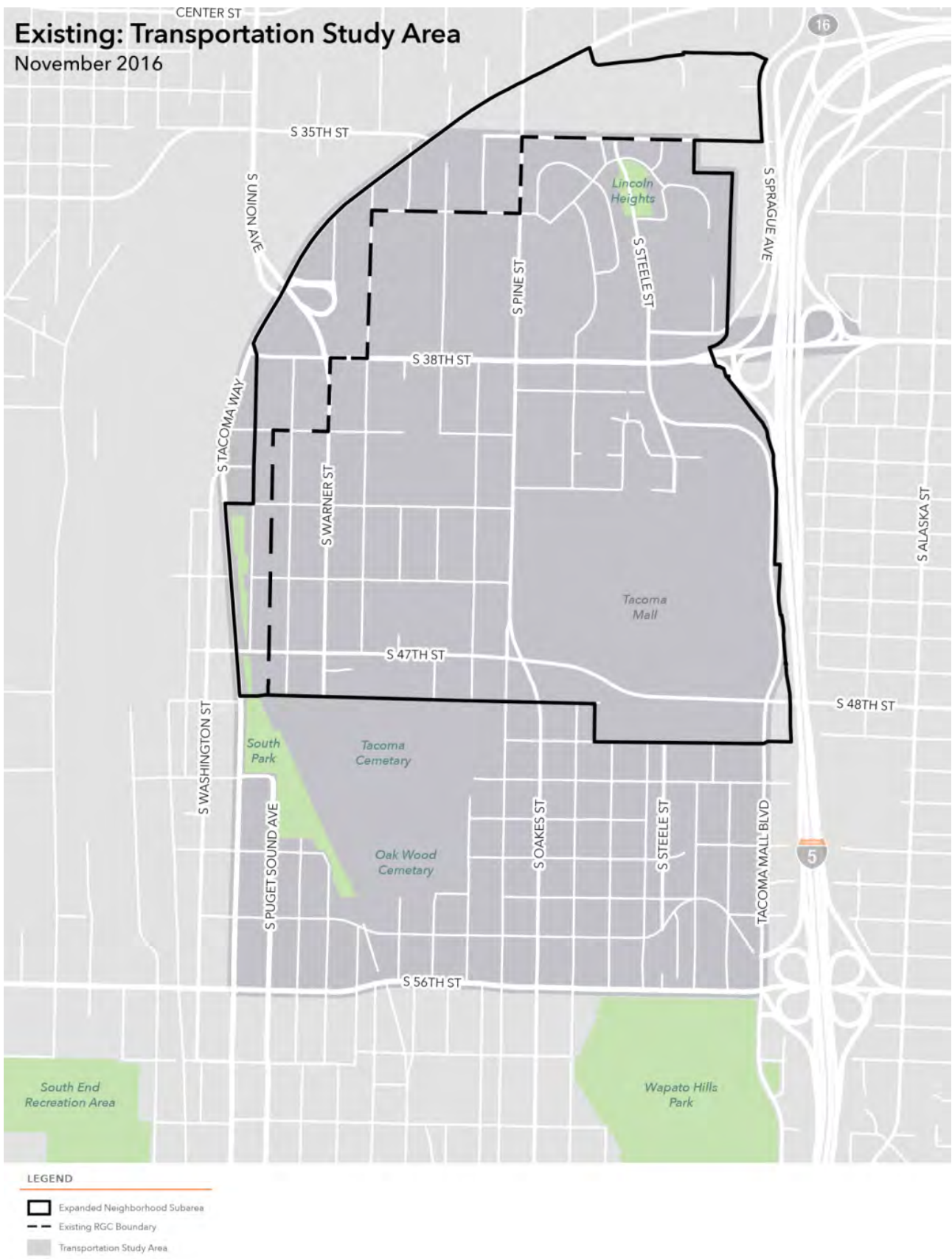
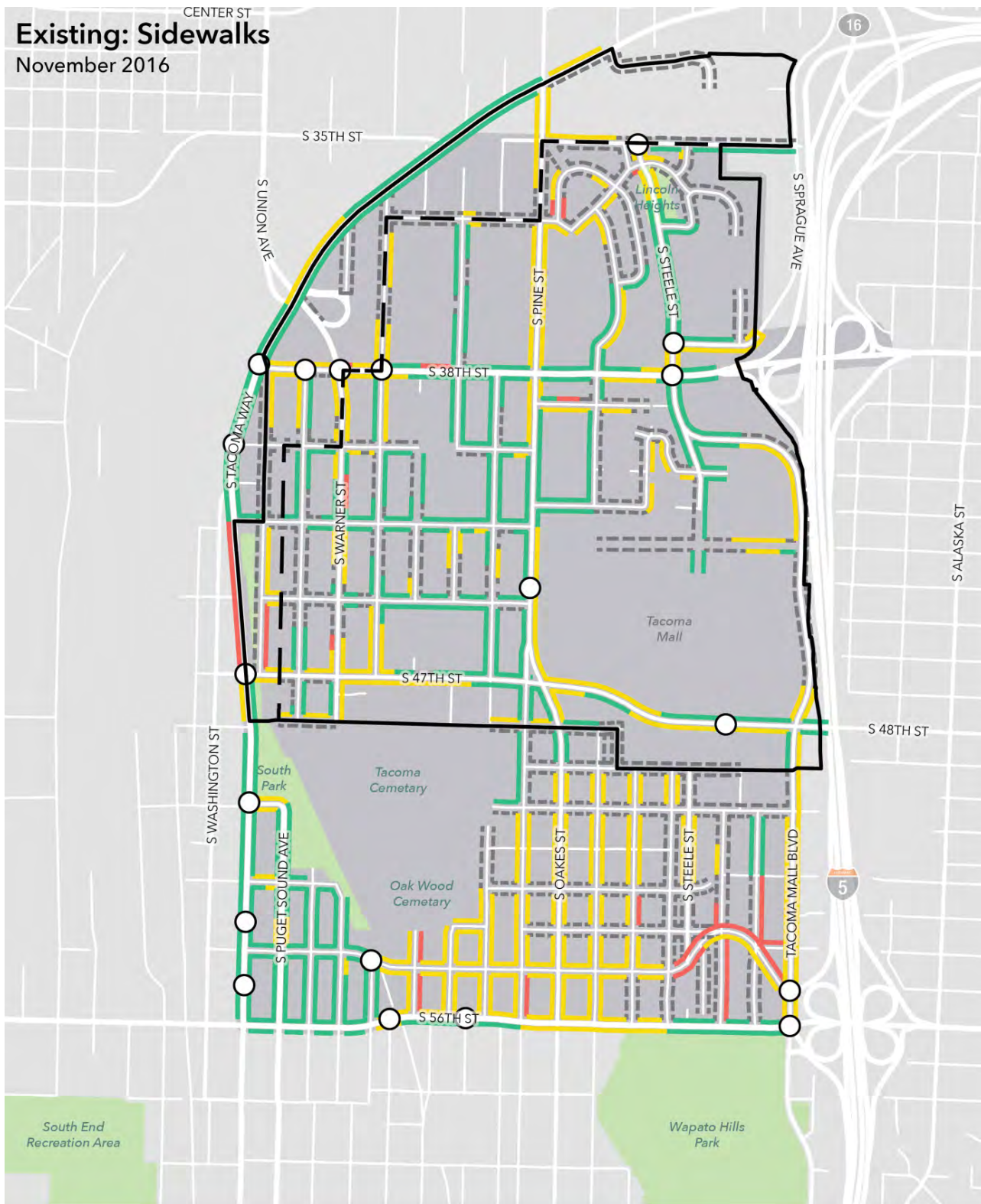


Figure 3.6.2. Transportation Study Area

Source: City of Tacoma, 2016; Fehr & Peers, 2016; 3 Square Blocks, 2016

Existing: Sidewalks
November 2016



LEGEND

- | | | |
|-------------------------------|---------------------|--------------|
| Expanded Neighborhood Subarea | Good | Poor |
| Existing RGC Boundary | Fair | Missing |
| Transportation Study Area | Existing Crosswalks | 1+ Crosswalk |

Figure 3.6.3. Existing Sidewalk and Crosswalk Conditions
Source: City of Tacoma, 2016; Fehr & Peers, 2016; 3 Square Blocks, 2016

Existing: Bicycle Facilities
November 2016

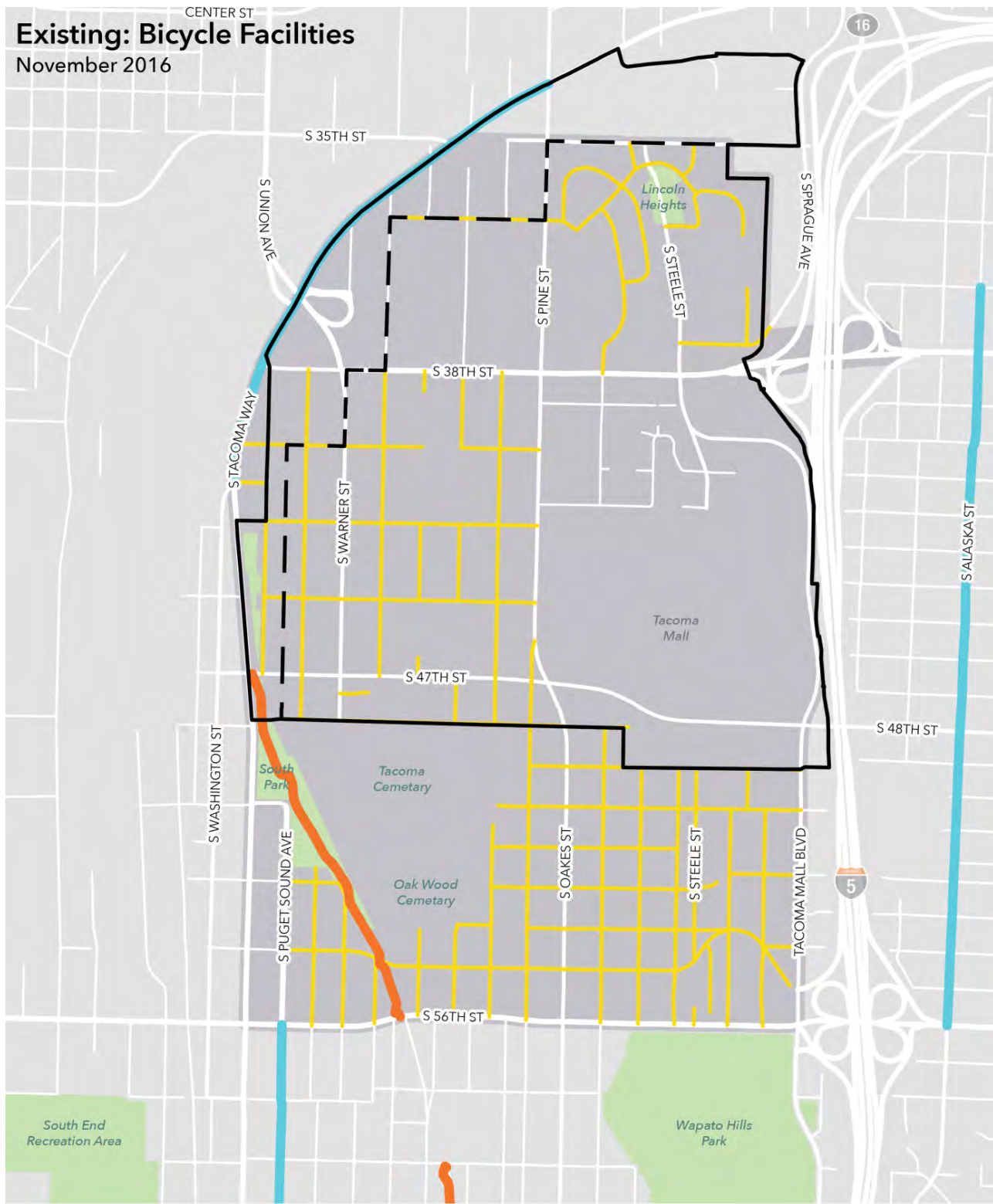


Figure 3.6.4. Existing Bicycle Infrastructure

Source: City of Tacoma, 2016; Fehr & Peers, 2016; 3 Square Blocks, 2016.

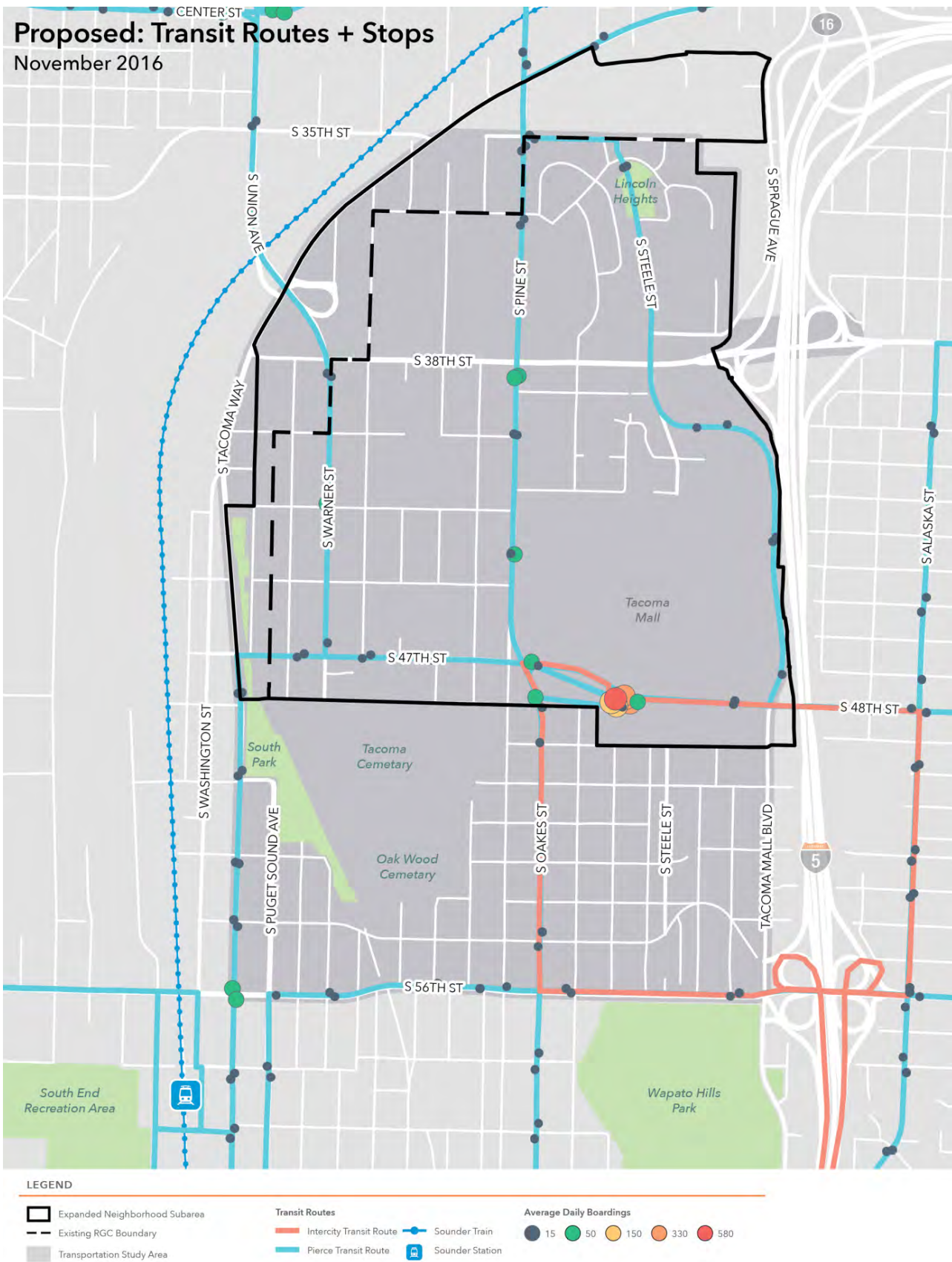


Figure 3.6.5. Existing Transit Routes and Stops

Source: City of Tacoma, 2016; Fehr & Peers, 2016; 3 Square Blocks, 2016.

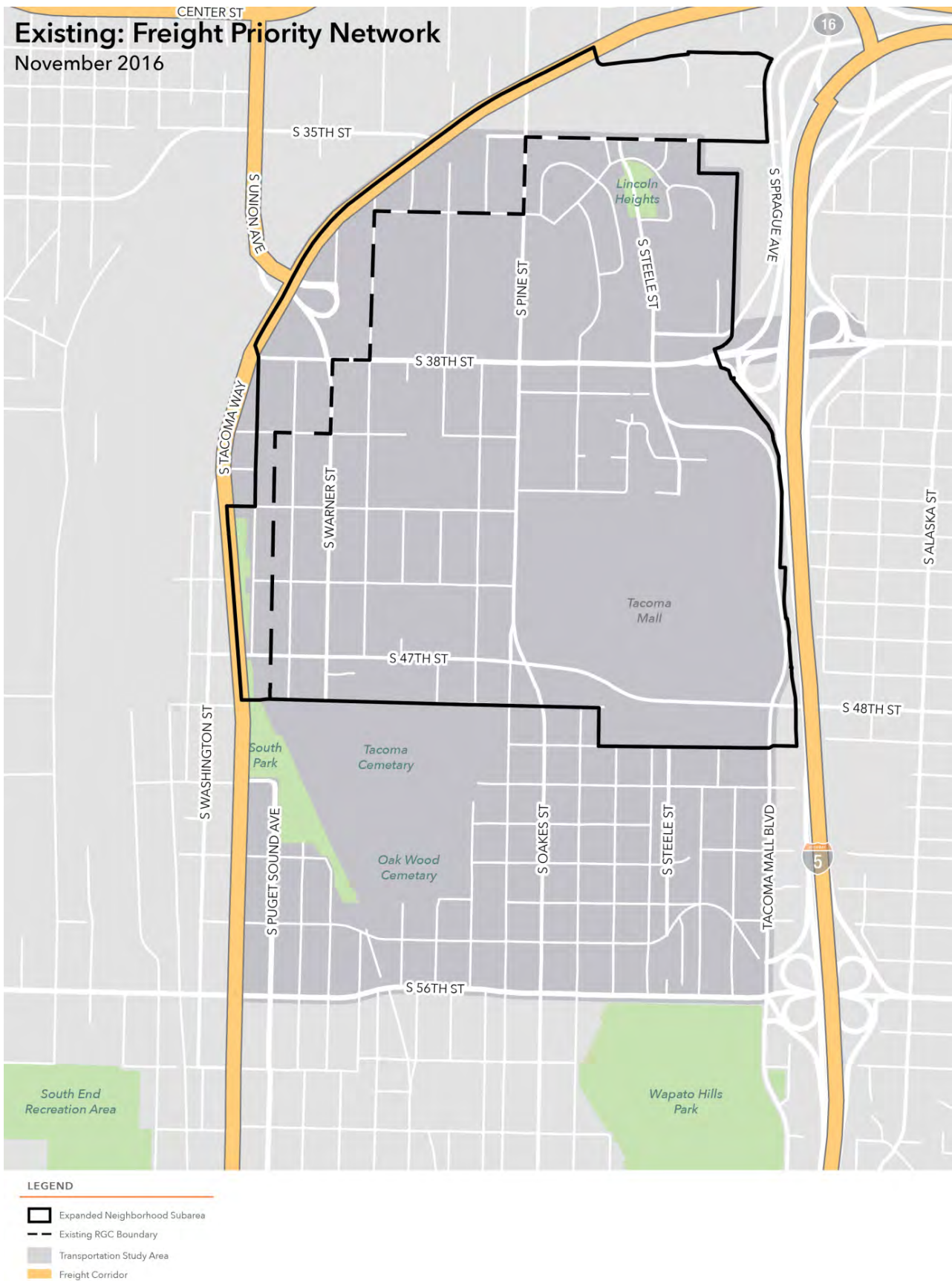


Figure 3.6.6. Existing Freight Priority Network

Source: City of Tacoma, 2016; Fehr & Peers, 2016; 3 Square Blocks, 2016.

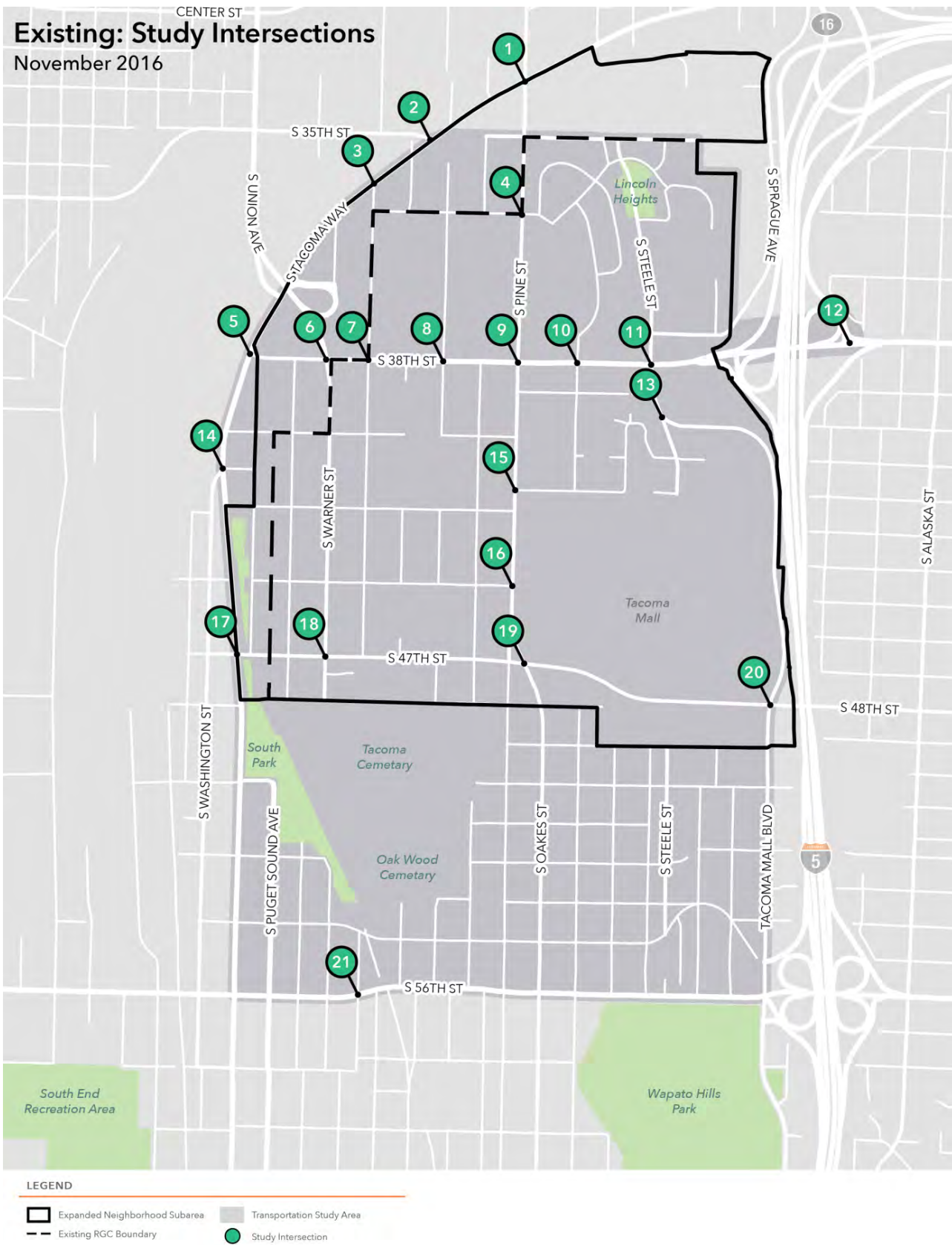
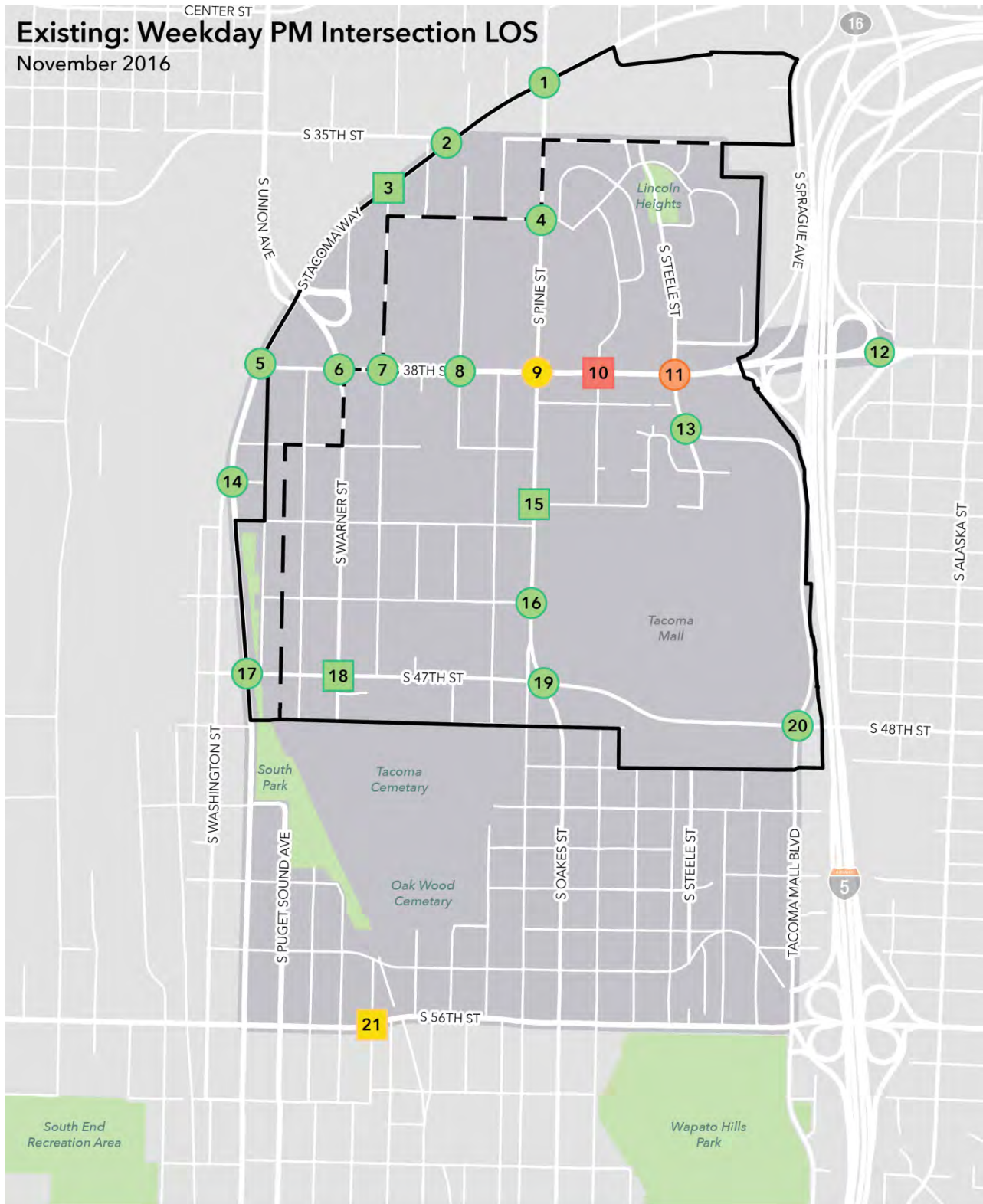


Figure 3.6.7. Study Intersections

Source: City of Tacoma, 2016; Fehr & Peers, 2016; 3 Square Blocks, 2016.

Existing: Weekday PM Intersection LOS
November 2016



LEGEND

- Expanded Neighborhood Subarea
- Existing RGC Boundary
- Transportation Study Area
- 1 Signalized Intersection
- 1 Unsignalized Intersection
- Weekday PM Intersection LOS**
- A-C
- D
- E
- F

Figure 3.6.8. Existing Weekday P.M. Intersection Level of Service
Source: City of Tacoma, 2016; Fehr & Peers, 2016; 3 Square Blocks, 2016

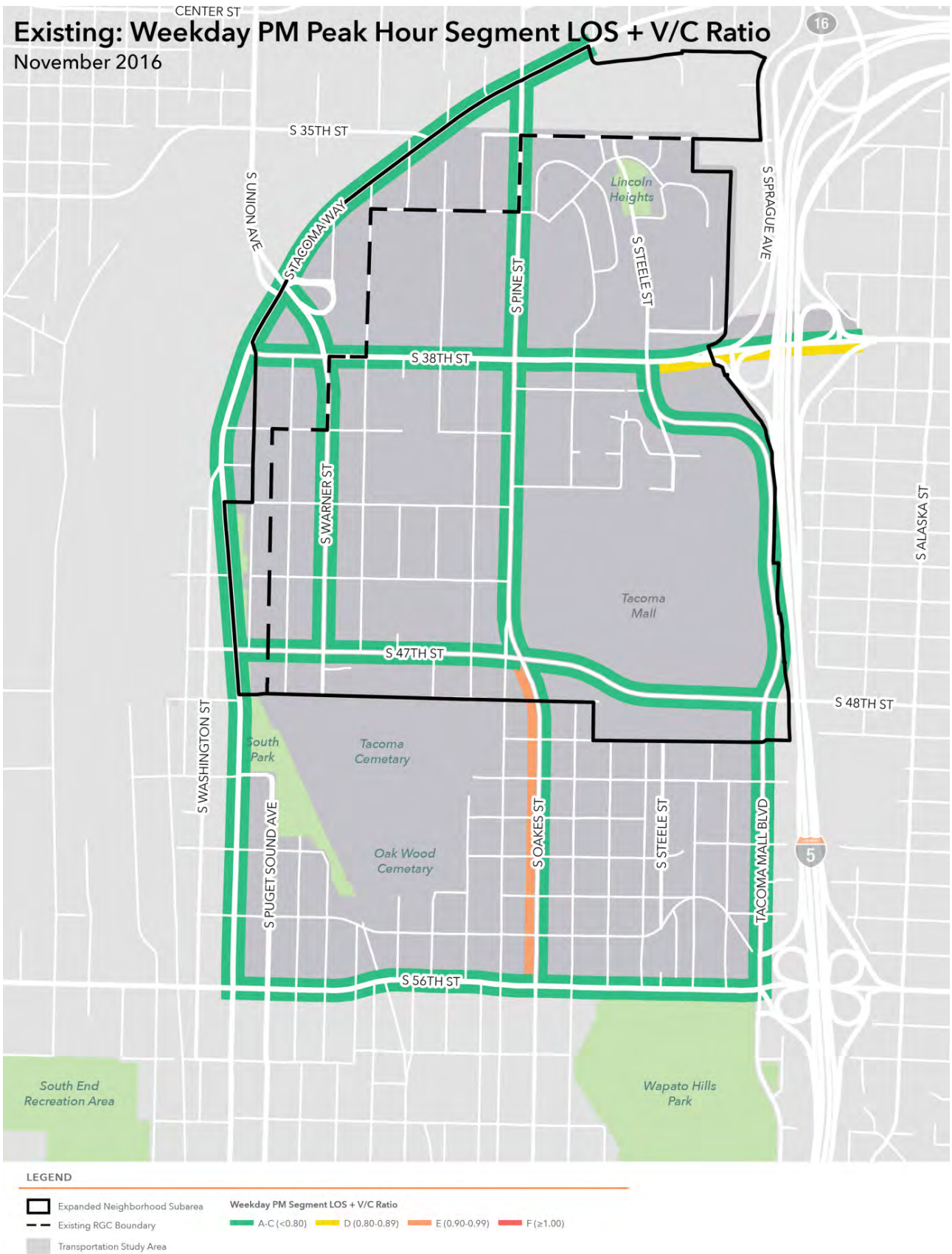
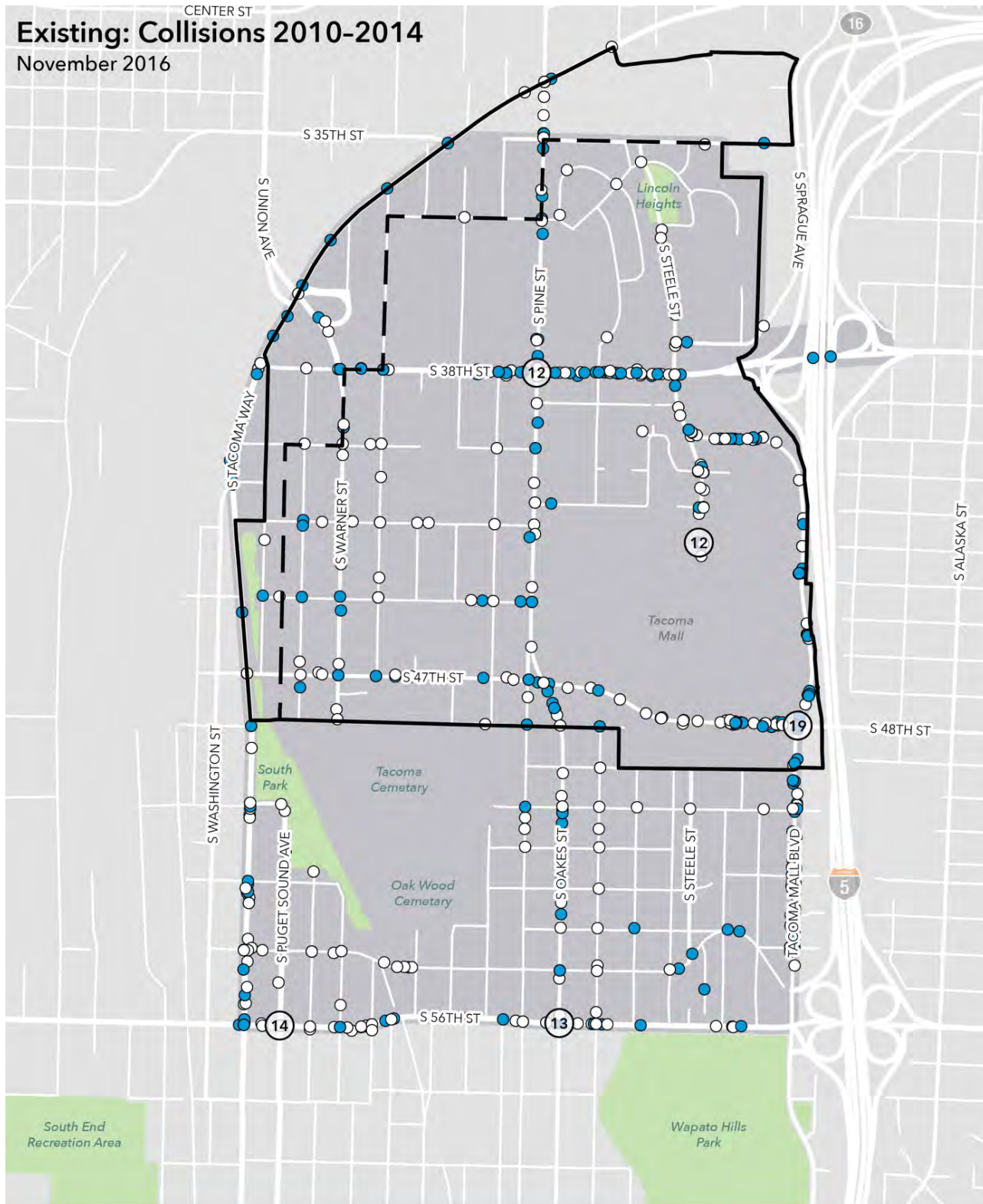


Figure 3.6.9. Existing Weekday P.M. Peak House Segment Level of Service and V/C Ratio

Source: City of Tacoma, 2016; Fehr & Peers, 2016; 3 Square Blocks, 2016

Existing: Collisions 2010-2014
November 2016



LEGEND

- Expanded Neighborhood Subarea
- Existing RGC Boundary
- Transportation Study Area
- Weekday PM Intersection LOS**
- 1 Top 5 Injury Collision Intersections (# of Collisions)
- Injury Collision
- Non-Injury Collision

Figure 3.6.10. Collisions, 2010–2014

Source: City of Tacoma, 2016; Fehr & Peers, 2016; 3 Square Blocks, 2016

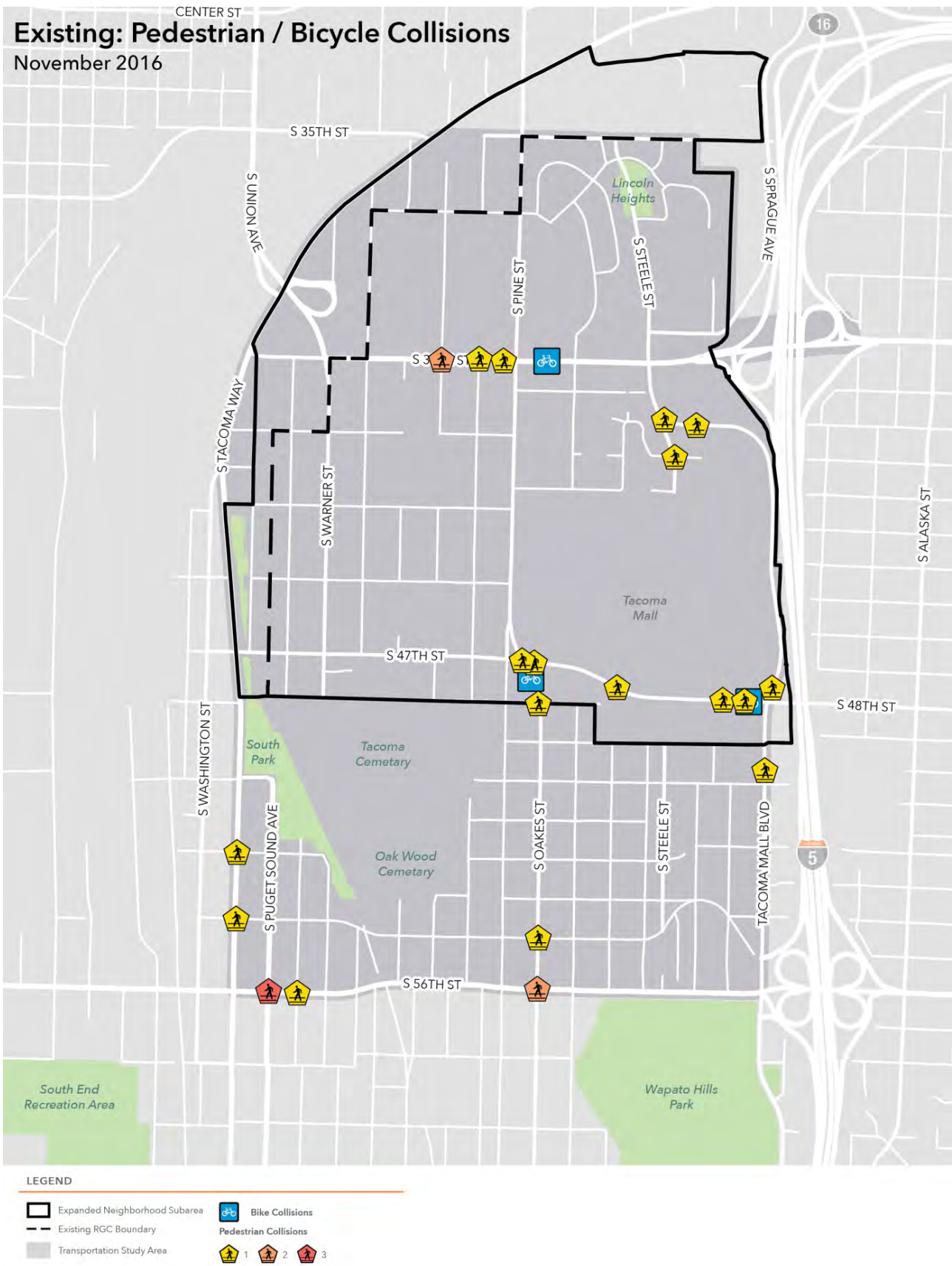


Figure 3.6.11. Pedestrian and Bicycle Collisions

Source: City of Tacoma, 2016; Fehr & Peers, 2016; 3 Square Blocks, 2016

PARKING MANAGEMENT TOOLBOX

A parking demand management strategy can include some but is not limited to the following:

- Once on-street parking supply utilization exceeds 85 percent on roadway segments during business hours, consider the appropriate tools necessary to ensure the priority users for the area remain the priority. If parking spillover is determined to be an issue on residential streets, deploy the City's residential parking zones (RPZs) program to prioritize curb space for neighborhood residents and their visitors while maximizing the use of the right-of-way with deployment of time stay controls.
- As centers develop, review Tacoma's parking codes to ensure they align with the desired urban setting. This may include adopting parking maximums rather than minimums for new developments and major remodels.
- Encourage more shared parking by developing public parking facilities that promote a "park once" concept. Additionally, future developments should embrace, where partnerships make sense, multi-use shared parking facilities where the tenant mix allows for the maximum use of the parking space.
- Eliminate subsidies for drive-alone employees.
- Continue to encourage Tacoma area employers to offer incentives for commute options including use of carpools/vanpools, fully paid transit passes, and parking cash out programs that encourage multi-occupant commuting through employees' monetary benefits rather than free parking.

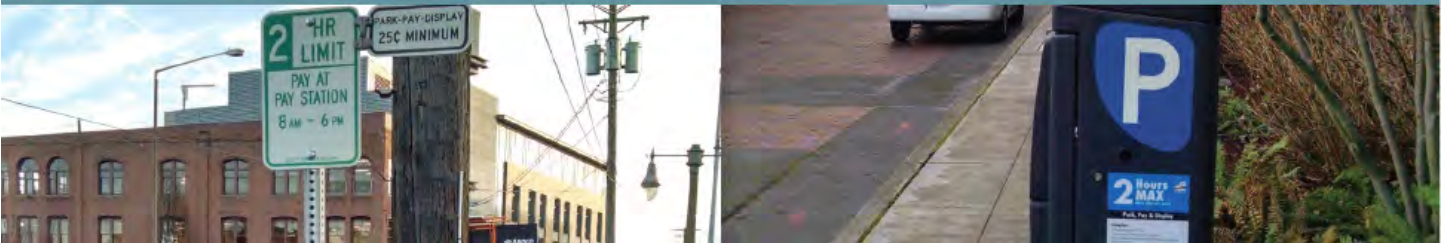


Figure 3.6.12. Parking Management Toolbox

Source: City of Tacoma TMP, 2015

Appendix A

MXD

The table below highlights the three key variables adjusted in MXD.

Period	Vehicle Ownership	Intersection Density	HH Size
2015	1.36	50	2.48
2040 NB	1	85	2.13
2040 Build	1	110	2.13

Notes:

Vehicle Ownership: Figures for 2015 are based on ACS data. Values for 2040 are assumed lower to reflect a higher-density, more urban area.

Intersection Density: This variable is a way to describe the quality of the walking environment. The 2015 value was based on information from the EPA Smart Location Database. The 2040 No Build and Build numbers were based on a count of the number of new streets with improved sidewalks and streetscape.

Household Size: Census data from 2010 were used for 2015 values, while 2040 assumes a lower HH size based on a higher proportion of multifamily units in the area.

Existing results:

Advanced Output				
MXD+ Vehicle Trip Generation Reductions				
	Daily	AM	PM	
Internal Capture	7,672	1,158	1,046	
Shift to Transit	1,095	232	262	
Shift to Walk/Bike	1,661	268	213	
MXD+ Vehicle Trip Generation Reduction Percent				
	Daily	AM	PM	
Internal Capture	13.4%	17.3%	14.6%	
Shift to Transit	1.9%	3.5%	3.7%	
Shift to Walk/Bike	2.9%	4%	3%	

Alternative 1 results:

Advanced Output				
MXD+ Vehicle Trip Generation Reductions				
	Daily		AM	PM
Internal Capture	19,800		2,680	2,350
Shift to Transit	3,226		642	893
Shift to Walk/Bike	1,892		314	242

MXD+ Vehicle Trip Generation Reduction Percent				
	Daily		AM	PM
Internal Capture	19.2%		22.6%	19.2%
Shift to Transit	3.1%		5.4%	7.3%
Shift to Walk/Bike	1.8%		2.6%	2%

Alternative 2 results:

Advanced Output				
MXD+ Vehicle Trip Generation Reductions				
	Daily		AM	PM
Internal Capture	28,502		3,972	3,764
Shift to Transit	6,298		1,120	1,338
Shift to Walk/Bike	2,938		454	370

MXD+ Vehicle Trip Generation Reduction Percent				
	Daily		AM	PM
Internal Capture	21.9%		28%	24%
Shift to Transit	4.8%		7.9%	8.5%
Shift to Walk/Bike	2.3%		3.2%	2.4%

Appendix B

Subarea Plan Projects List

Project ID	Name	Description	Phase	Source	Cost (thousands)	Length (ft)	\$/lf	Cost	Notes
1	Loop Road Demonstration Project	Initial implementation of a section of the Loop Road – would include a study to identify the best location	Design, Right-of-Way, Construction		\$ 1,500				
2	I-5/Tacoma Mall Blvd. Direct Connector Slip Ramp Phase 1	Preliminary engineering study for new direct access/high occupancy vehicle freeway off ramp	Design		\$ 900				
3	Madison District - Green Stormwater Infrastructure Streets Phase 1	Permeable Roadway Facilities in the Madison Neighborhood	Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 5,000	0	\$ -	\$ 8,230,000	Sum of Green Roadways
4	S. 38th Street/ S. Steele Street Intersection	Revise intersection channelization to improve vehicle operations; may require new turn lane	Design, Right-of-Way, Construction		\$500 - \$1,500				
5	Tacoma Mall Transit Center - Phase 1	Location study and preliminary design for new transit center	Design		\$ 900				
6	I-5/Tacoma Mall Blvd. Direct Connector Slip Ramp	As of 2016, this project will construct a new overpass from southbound I-5 at South 38th Street to Tacoma Mall Blvd. The project will include the structure, roadway modifications, curb and gutter, new signal, streetlighting, storm sewer, landscaping and utility relocation work, and asphalt overlay between Steele St and S 48th St. It will directly connect to a new or relocated multi-modal transit center.	Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 27,650	1	\$ 19,200,000	\$ 27,650,000	Taken from TMP
7	S. 38th Complete Street/Gateway Project	This roadway will remain auto-oriented; however, other modes will also be accommodated as necessary/feasible.	Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 10,660	1	\$ 7,400,000	\$ 10,660,000	Taken from TMP
8	Tacoma Mall Transit Center		Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 28,000				
9	Loop Road Phase 2	Complete Loop Road - Multimodal internal connector emphasizing	Design, Right-of-Way, Construction		\$ 12,700				
10	Madison District - Green Stormwater Infrastructure Streets Phase 2	Permeable Roadway Facilities in the Madison Neighborhood	Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 3,230	0	\$ -	\$ 8,230,000	Sum of Green Roadways
11	Pine Street - Complete Streets/Gateway Project	Complete Streets redesign including bicycle and transit service	Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 2,940	3400	\$ 600	\$ 2,940,000	0

Project ID	Name	Description	Phase	Source	Cost (thousands)	Length (ft)	\$/lf	Cost	Notes
12	S. 47th / 48th Street Completion	Complete Streets redesign incorporating bike connection from I-5 bridge to Water Flume Trail	Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 5,040	5000	\$ 700	\$ 5,040,000	Includes Sidewalk
13	S. 48th Street Overpass - overpass or shared use project as part of any WSDOT new or reconstruction project	Overpass or shared use project as part of any WSDOT new or reconstruction project	Design, Right-of-Way, Construction	TMP	\$ 1,810	3600	\$ 350	\$ 1,810,000	0
14	S. 35th Street - Add bike facilities, complete streets improvements and new street connection	Add bicycle facility and extend corridor to South Tacoma Way	Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 2,720	1	\$ 1,890,000	\$ 2,720,000	2,500 LF of bike facilities. 19,000 CY of excavation. 800 LF new roadway
15	Add bike facility to S. 37th St./S. Sprague Ave.	Add bicycle connection from I-5 Bike/Ped Bridge to Steele Street. Connect along Sprague Ave to S 35th St.	Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 1,370	2500	\$ 380	\$ 1,370,000	
16	Area Wide Sidewalk Gaps	Construct sidewalks where they currently do not exist or where a link is missing. Improve sidewalks in locations that are shown in poor condition. This project would be part of a City-wide Pedestrian Improvement Project that would prioritize investments within Regional Growth Centers.	Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 14,230	26000	\$ 380	\$ 14,230,000	Lincoln Ft - 6800, Mall - 3600ft, Madison - 670x18=12060 ft, NW - 3700
17	Madison Area Grid Connections	This project modifies the Madison neighborhood area street system to provide reconnection of the grid with new, more direct connections where needed to support the land use vision of the Sub-Area Plan. This area is primarily residential and will retain that character in 2040.	Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 13,100	13000	\$ 700	\$ 13,100,000	Includes Sidewalks. No ROW assumed
18	Mall Area Grid Connections	This project modifies the Mall area street system to provide reconnection of the grid with new, more direct connections where needed to support the land use vision of the Sub-Area Plan.	Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 14,620	14500	\$ 700	\$ 14,620,000	Includes Sidewalks. No ROW assumed
19	Lincoln Heights Grid Connections	This project modifies the Lincoln Heights neighborhood area street system to provide reconnection of the grid with new, more direct connections where needed to support the land use vision of the Sub-Area Plan. This area is primarily residential and will retain that character in 2040.	Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 4,840	4800	\$ 700	\$ 4,840,000	Includes Sidewalks. No ROW assumed
20	NW Quadrant Grid Connections	This project modifies the Northwest Quadrant area street system to provide reconnection of the grid with new, more direct connections where needed to support the land use vision of the Sub-Area Plan.	Design, Right-of-Way, Construction	Tacoma Mall Subarea Plan (TMSAP)	\$ 6,550	6500	\$ 700	\$ 6,550,000	Includes Sidewalks. No ROW assumed
21	Support HCT Corridor to Sub-Area (Sound Transit or Pierce Transit)			Tacoma Mall Subarea Plan (TMSAP)					

Project ID	Name	Description	Phase	Source	Cost (thousands)	Length (ft)	\$/lf	Cost	Notes
22	S. Fife St./Montana Ave. Bike Blvd			Tacoma Mall Subarea Plan (TMSAP)					
23	Transit-supportive actions (speed and reliability enhancements) on S. Tacoma Way throughout the sub-area to support Pierce Transit plans for high-frequency service for a transit route that originates and terminates at points north and south of the Sub-Area.			Tacoma Mall Subarea Plan (TMSAP)					
24	Transit-supportive actions (speed and reliability enhancements) for Pierce Transit plans for high-frequency service for a transit route along S. Tacoma Way to east of I-5 via S 56th St., Oakes St., Pine St., and S. 38th St.			Tacoma Mall Subarea Plan (TMSAP)					
25	Small links for bike facilities			Tacoma Mall Subarea Plan (TMSAP)					
26	Sub-Area Corridor Tree Planting Project			Tacoma Mall Subarea Plan (TMSAP)					
27	Add bike facility to S. 43rd St.			Tacoma Mall Subarea Plan (TMSAP)					
28	Pedestrian connections to Water Flume Trail at S. 47th St., S. 43rd St., S. 38th St., S. 35th St., S. Pine St., and with the Lincoln Heights neighborhood.			Tacoma Mall Subarea Plan (TMSAP)					
29	Construct a new bicycle and pedestrian bridge across Interstate 5 in the vicinity of S. 43rd St.								
30	Tacoma Mall Blvd Complete Street and HOV Lanes Project			Tacoma Mall Subarea Plan (TMSAP)					
31	Add bike facility connecting S. 48th Street through the Tacoma Mall site to the Multi-Modal Loop Road			Tacoma Mall Subarea Plan (TMSAP)					
32	Add signal and signing & striping improvements at S. 38th St. and S. Fife St.			Tacoma Mall Subarea Plan (TMSAP)					
33	Green Infrastructure Improvements. Permeable Roadway Facilities in the Lincoln Heights Neighborhood w/ 6 bulbouts			Tacoma Mall Subarea Plan (TMSAP)					
34	Add signal at S. Pine St. and 42nd St.			Tacoma Mall Subarea Plan (TMSAP)					
35	Add bike facilities to Wright Avenue connecting South Tacoma Way to S. 35th St.								
36	Add bike facility to (planned) S. 39th St.			Tacoma Mall Subarea Plan (TMSAP)					

Project ID	Name	Description	Phase	Source	Cost (thousands)	Length (ft)	\$/lf	Cost	Notes
37	Traffic safety improvements at high collision locations. The City will conduct a Sub-Area Traffic Safety Study to identify improvements to be implemented at high collision locations.			Tacoma Mall Subarea Plan (TMSAP)					
38	Green Infrastructure Improvements. Regional Stormwater Treatment & Emergency Overflow in the NW Quadrant			Tacoma Mall Subarea Plan (TMSAP)					
39	HCT Corridor - S 38th St - Possible BRT/Light Rail/Streetcar service			TMP					
40	HCT Corridor - S 48th St - Possible BRT/Light Rail/Streetcar service			TMP					
41	HCT Corridor - West End Crosstown - Possible BRT/Light Rail/Streetcar service to connect Tacoma's West End neighborhood with the Proctor Business District, University of Puget Sound, Central Tacoma Business District, Tacoma Mall, Pacific Ave. Business Districts, and Pacific Lutheran University			TMP					
42	South Tacoma Way - C to Pine St - Street Rehabilitation Project			TMP					
43	Union Avenue / S. Warner Street Corridor Improvement Project - signal integration and coordination project and other ITS applications			TMP					

PUBLIC SERVICES

CHAPTER 3.7

S. 36TH ST

S. PINE ST

LELE ST

S. 38TH ST

15

TACOMA MALL NEIGHBORHOOD SUBAREA EIS



TACOMA MALL neighborhood

CHAPTER 3.7



PUBLIC SERVICES

3.7.1 FIRE AND EMERGENCY SERVICES

EXISTING CONDITIONS

SERVICES

The Tacoma Fire Department provides fire protection and emergency medical services (EMS) in Tacoma, including the study area, and in Fife, Fircrest and unincorporated areas within Pierce County Fire District No. 10. The Department has service agreements in place with Pierce County Fire District No. 10 and the City of Fircrest (Tacoma Office of Management and Budget (OMB), 2014).

RESOURCE INVENTORY

The Department operates 15 staffed stations with 13 fire engines, 4 ladder trucks, 5 medic companies, 2 squad companies and 3 battalion command vehicles. A cross-staffed hazardous materials response team is located at Fire Station 12, in Fife. A cross-staffed technical rescue team is located at Station 8, in South Tacoma. Cross-staffed marine emergency response fireboats are operated out of Station 14, in North Tacoma. As of 2015, the Department had 389.5 full-time equivalent staff (Tacoma Fire Department, 2015).

The closest fire stations to the study area are Station 7 and Station 8, located at 5488 S. Warner St. and 4911 S. Alaska St., respectively (City of Tacoma OMB, 2014). Station 8 has a ladder truck equipped to respond to fires in multistory buildings (Tacoma Fire Department, 2016).

PERFORMANCE

The Department currently responds to about 125 911 calls per day (Tacoma Fire Department, 2016). During 2015 the Department responded to 45,266 emergency incidents. Of these, 1,301 were found to be fires, 30,552 were EMS incidents and 13,413 were other types of incidents (Tacoma Fire Department Fire Department, 2016). Examples of other types of emergency incidents include hazardous conditions search and

rescue and responses for automatic fire alarms (Tacoma Fire Department Fire Department, 2015).

The Department monitors the time elapsed from when it receives a 911 call to when the first responders arrive on scene. This is referred to as the total response time and is considered an industry best practice for reporting performance. The total response time goal for this area for fire and EMS is six and a half minutes. Current total response time performance for this area is roughly eight and a half minutes for 90% of critical incidents (City of Tacoma Fire Department Fire Department, 2015).

FIRE DEPARTMENT PLANS

In 2011 the Department completed a comprehensive assessment of its facilities needs with the goal of more effectively mitigating risk to the community and as part of its Commission on Fire Accreditation International (CFAI) reaccreditation effort. It recommended that the Department replace and remodel existing facilities and create a campus facility to improve operational efficiency. Seventy-two percent of existing fire stations and facilities are between 40–100 years old and many are well beyond their life expectancy (Tacoma Fire Department Fire Department, 2011). Based on the Department's facilities assessment, the two stations closest to the study area are in need of improvement.

The Fire Department Facilities Master Plan calls for replacing Station 7 and remodeling Station 8. The Facilities Master Plan also calls for creating one new station to help meet future city-wide demand. A location for the new station has not yet been identified.

Funding to carry out the Department's Facilities Master Plan has not yet been secured. City staff had planned to propose a multiyear levy or capital bond to help finance new facilities but this was deferred due to the Great Recession. Also due to the Great Recession, funding for the Department has decreased, which has led to reductions in staffing and the closing of one fire station located in the City's tideflats (1015 East F Street; Tacoma OMB, 2014). The Department has been focused on identifying and implementing operational efficiencies to help balance current resources with projected increases in demand for services (Tacoma Fire Department Fire Department, 2014).

The City's 2015–2020 Capital Facilities Program includes plans for maintenance and renovation of existing fire facilities. It also calls for major improvements to the Marine Security and Operations Center and remodeling of existing facilities in the tideflats that can be used to base first responders (Tacoma OMB, 2014).

Alternative 1 (No Action) and Alternative 2 (Action Alternative)

Alternative 1 (No Action) would maintain the existing RGC boundaries and growth targets, as well as the City's current development regulations for the subarea. Alternative 2 (Action Alternative) proposes to expand the RGC boundaries, increase growth targets for the subarea to account for this expansion, and adopt and implement the Tacoma Mall Neighborhood Subarea Plan including changes to zoning and development regulations.

Public safety directly impacts health and well-being. Access to fire department service in a timely manner saves lives.

SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

Under both alternatives significant housing and jobs growth is expected to occur, average building heights are expected to increase in various amounts and locations in the study area, and construction and redevelopment are expected to occur. Population growth is anticipated to generate new demands for fire and EMS services within the study area, and an increase in the number of multistory buildings in the study area is expected to increase the potential for emergencies requiring a ladder truck response. These impacts are discussed in greater detail below. Increased construction activities could result in an increase in demand for fire and EMS services because the Tacoma Fire Department makes service calls related to inspection of construction projects and responds to construction-related accidents.

Growth and development are expected to occur incrementally under both alternatives as new developments are built over time, and the associated impacts are expected to occur incrementally as well. This would allow time for the Tacoma Fire Department to address future needs for fire and EMS in the study area through planned facilities improvements such as replacement of Station 7 and remodeling of Station 8. Additionally, the study area could be considered the future location of the new station called for in the Facilities Master Plan. In addition to addressing the impacts of growth, these improvements would address existing identified facility needs and help improve the Department's response times in the study area.

As discussed under Existing Conditions, currently the City has no funding in place to implement the Department's Facilities Master Plan. Identifying funding sources to implement planned capital improvements in the study area is recommended as part of the City's ongoing capital improvement planning and budgeting processes.

Population Growth

The City's Comprehensive Plan establishes level of service (LOS) standards for fire and EMS apparatus to assist in determining the need for additional apparatus. The LOS for fire apparatus is 0.109 apparatus per 1,000 people and the LOS for EMS apparatus is 0.016 units per 1,000 people. Based on these levels-of-service, under both alternatives there would be a need for one additional staffed fire engine

The Fire Department is in the process of developing information on the number of calls received compared with the number of

people in different areas of the City, in order to assist with planning efforts. The Fire Department does not currently track the number of calls received per person in the study area. Based on the Fire Department's existing citywide level of about 200 calls per 1,000 residents (Tacoma Fire Department, 2016), the population increases targeted under the alternatives could result in an increase of approximately 1,600 to 1,800 calls annually by 2040. Given the level of density proposed under alternatives, and related increases in call volumes, construction of a new fire station with staff for an additional engine in the study area may be needed. Development of finer-grained data for the study area would assist the Tacoma Fire Department in forecasting future capital facilities needs (Tacoma Fire Department, 2016).

IMPACTS OF ALTERNATIVE 1 (No Action)

No impacts other than those described under Impacts Common to All Alternatives.

IMPACTS OF ALTERNATIVE 2

The Draft Subarea Plan includes policies intended to strengthen provision of public services in the Tacoma Mall Neighborhood, including fire and emergency medical services. Action US-8 calls for coordinating with public service providers to ensure that any plans for new fire, police, school or park facilities in the neighborhood take advantage of opportunities to support the goals of the Subarea Plan. Action CV-17 specifically calls for monitoring trends in fire and emergency medical services calls in the neighborhood, and taking this information into account when planning for future service improvements with neighborhood leaders. If successfully implemented, these actions are expected to have positive impacts on fire and emergency services in the study area.

MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action

- Under Alternative 2, successful implementation of Actions US-8 and CV-17 are expected to increase coordination of planning efforts for provision of fire and emergency medical services in the study area.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

- Under both alternatives, ongoing City capital facilities improvement, budgeting, and operational planning efforts are anticipated to address incremental increases and other changes in demand for fire services, including the need for facility improvements and additional apparatus.
- Under both alternatives, all potential new development in the study area would be constructed in compliance with the City's current fire code.
- Under both alternatives, a portion of the tax revenue generated from potential redevelopment in the study area would accrue to the City and be used to help fund fire and emergency services.

OTHER MITIGATION MEASURES

Any other mitigation not contained in the categories above

- Under both alternatives, as part of the City's ongoing capital facility improvement, budgeting and operational planning efforts, set priorities for identification of funding for the facility improvements needed to serve planned growth in the study area.
- Under Alternative 1, consider collaboration between the Tacoma Fire Department and Planning and Development Services to develop data on the number of calls in the study area and the current and projected daytime populations in order to assist in forecasting future facilities needs to serve the study area, similar to what is proposed under Alternative 2.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts to fire and emergency services are anticipated.

3.7.2 POLICE

EXISTING CONDITIONS

SERVICES

The Tacoma Police Department provides law enforcement in the City of Tacoma, including the study area. The Department's services include patrol, investigations, special weapons and tactical response, marine services, traffic enforcement/investigations, special investigations (narcotics and vice), animal control and compliance, officer training, youth education, crime prevention and community-oriented policing (City of Tacoma OMB, 2014).

RESOURCE INVENTORY

The Department is organized into three bureaus: Administrative Services, Investigations and Operations. The Administrative

Services Bureau oversees divisions responsible for the investigation of police conduct and citizen complaints and that manage hiring, accreditation, finance, crime analysis, information technology and community relations. The Operations Bureau includes a Patrol Division that provides 24/7 patrol coverage and a Community Policing Division that focuses on prevention and crime reduction through collaborative efforts with the community and public and private entities. The Investigations Bureau conducts follow-up investigations of crimes against persons and property (City of Tacoma OMB, 2014).

The Department's inventory of facilities includes Police Headquarters, six substations, a warehouse that houses Fleet Services and Police Special Operations, and a firing range (City of Tacoma OMB, 2014). All facilities are within Tacoma city limits. The City's 2015–2016 Adopted Biennial Operating and Capital Budget provides funding for 375.5 full-time equivalent Police Department staff, including ten new positions in Community Oriented Policing Services (City of Tacoma OMB, 2014).

The study area contains Police Headquarters and the Department's warehouse. These facilities are located at 3701 S. Pine St. and 3639 S. Pine St. respectively (City of Tacoma OMB, 2014). Headquarters facility staffing includes investigations, patrol and administrative personnel. Community police are located at sector substations. Community police responding to calls in the study area are generally from the Sector 3 substation, located outside the study area. Both the headquarters facility and the Sector 3 substation currently have capacity to accommodate additional police personnel (Tacoma Police Department, 2016).

PERFORMANCE

The Department has a number of metrics that it uses to track performance. A selection of these metrics is provided in Table 3.7-1, including the Department's 2014 performance level and 2015 target.

Table 3.7.1. Police Department Metrics (Citywide)

Metric	2014 Actual	2015 Target
Average Response Time Average police response time to emergency calls	3:54	4:00
Citizen Complaints Number of citizen complaints about police conduct	142	122
Crimes Against Persons Includes homicide, sex offenses, assault and abduction	21.1 per 1,000 residents	19.6 per 1,000 residents
Crimes Against Property Includes arson, burglary, destruction/vandalism, fraud, larceny, motor vehicle theft, robbery, and stolen property	101.1/ 1,000 residents	102.1/ 1,000 residents
Case Clearance Rate for Group A Offenses Calculated by the number of incidents and the cases cleared by arrest or exception	20%	27%
Fatal Traffic Accidents Number of fatalities resulting from traffic accidents	9	6

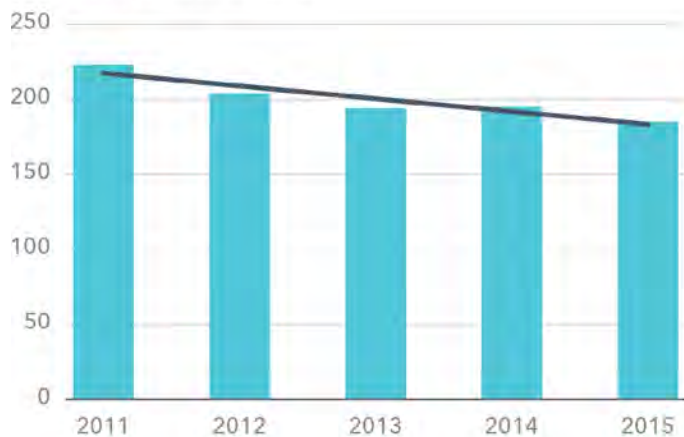
Source: City of Tacoma 2015–2016 Adopted Biennial Operating & Capital Budget

The Department tracks crime statistics including information on the number of crimes against persons, crimes against property, crimes against society and nonfatal traffic accidents. Crimes against persons and crimes against property are defined in Table 3.7-1. Crimes against society include narcotics, pornography, prostitution and weapon law violations. Nonfatal traffic accidents include those that result in injuries as well as those that do not (City of Tacoma Police Department, 2016).

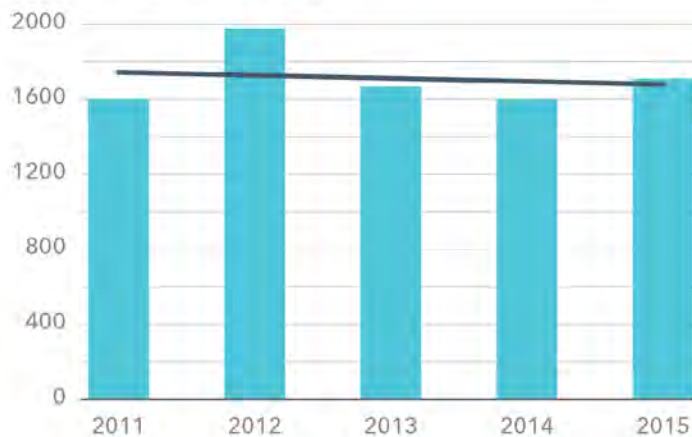
The population of the study area is approximately 3,800 (3 Square Blocks, 2016). In 2015, the Department recorded 185 crimes against persons and 1,710 crimes against property in the study area. This translates to 49 crimes against persons per 1,000 residents and 450 crimes against property per 1,000 residents. These ratios are much higher than the Department’s 2015 targets and indicate that criminal activity is a challenge facing the Tacoma Mall Neighborhood.

Over the past five years in the study area, the number of crimes against persons has decreased and the number of crimes against property has fluctuated but remained relatively constant. The number of crimes against society has decreased. The number of nonfatal traffic accidents has increased (Figure 3.7-1). Trends in the Tacoma Mall Regional Growth Center (RGC) mirror those of the study area.

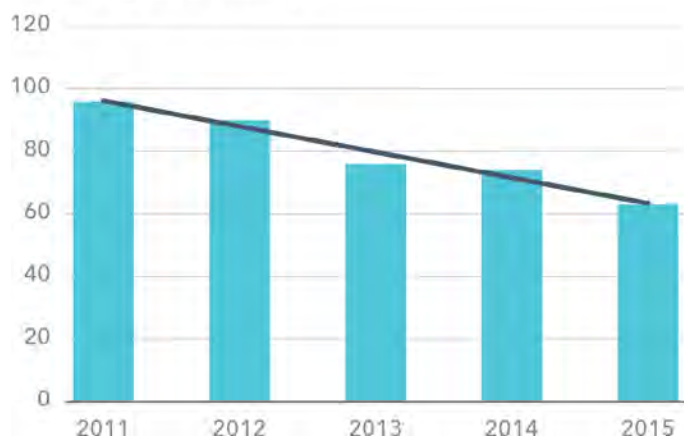
Crimes Against Persons



Crimes Against Property



Crimes Against Society



Traffic Collisions (Non-Fatal)

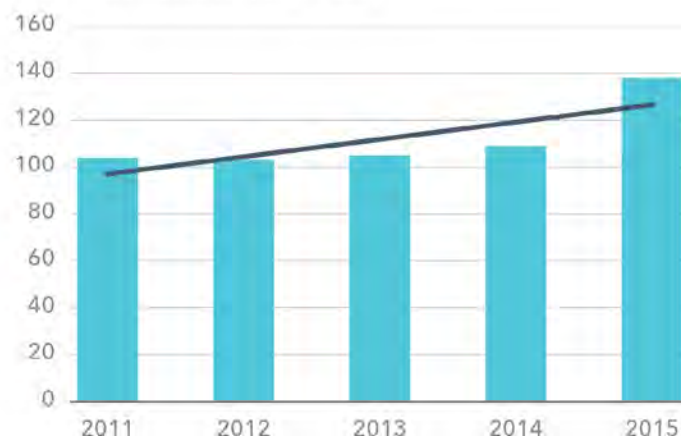


Figure 3.7.1. Crime Trends in the Study Area

Source: City of Tacoma Police Department, 2016

POLICE DEPARTMENT PLANS

The majority of Department facilities are in good condition. This is partly due to the fact that in 2002 voters approved a bond that funded construction of a new Police Headquarters, construction of four new substations and a remodel of the warehouse facility (City of Tacoma OMB, 2014).

The City's 2015–2020 Capital Facilities Program includes plans for improvements to the two law enforcement facilities located in the study area. Police Headquarters plans include Leadership in Energy & Environmental Design (LEED) improvements. Warehouse plans include conducting building site and interior improvements and replacing rooftop heating/ventilation units that have reached the end of their useful life.

The City's 2015–2016 Adopted Biennial Operating and Capital Budget lists major Police Department initiatives for 2015–2016. One of these is to develop a new strategic plan. Other notable Department initiatives include working toward Accreditation for Law Enforcement Agencies (CALEA) Reaccreditation and working to reduce crime through operational tools such as predictive police software (City of Tacoma OMB, 2014).

Impacts of Alternative 1 (No Action) and Alternative 2 (Action Alternative)

Alternative 1 (No Action) would maintain the existing RGC boundaries and growth targets, as well as the City's current development regulations for the subarea. Alternative 2 (Action Alternative) proposes to expand the RGC boundaries, increase growth targets for the subarea to account for this expansion, and to adopt and implement the Tacoma Mall Neighborhood Subarea Plan including changes to zoning and development regulations.

Crime prevention is key to public safety. While increased population in the study area is expected to result in an increase in crime, infill development can also have a positive impact on crime. Infill development could increase the "eyes on the street"—contributing to public safety simply by having a view toward and being present in public spaces.

SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

Impacts are anticipated to police services associated with the population growth, increased building heights and increased construction activity proposed under both alternatives. The Tacoma Police Department predicts that increased population in the study area would result in an increase in crime; however, the amount of increase would depend on a number of factors including characteristics of new businesses and residents in the study area, as discussed below. An increase in population could also result in the need for more police facility space and personnel. An increase in average building heights could potentially have an impact on police response times, depending upon the ability of the Department to put agreements in place with building managers for emergency building access (see additional discussion below). Potential construction activities under all the alternatives could result in an increase in demand for police services, because the Police Department responds to construction-related service calls such as construction site theft and vandalism. Existing departmental resources are anticipated to be sufficient to handle an increase in demand related to construction.

As discussed in Existing Conditions, crime rates in the study area are currently higher than the Police Department's targets and crime is a concern in the community. The Police Department is continually evaluating how to best address crime and strengthen community policing efforts. Infill development envisioned under both alternatives could have a positive impact on crime by reducing the number of vacant and underutilized parcels. Infill development could also increase the number of "eyes on the street"—community members who are watching streets and other public spaces in the study area at any given time and who contribute to neighborhood safety.

Facilities and Personnel

The City's Comprehensive Plan establishes an LOS standard for police facilities of 288.58 square feet of facility space per 1,000 people. Based on this LOS, another 2,300 to 2,600 square feet of police facility space would be needed by 2040 to serve the targeted population growth under both alternatives. In the short term, the Tacoma Police Department does not anticipate a need for new police facility space to serve the study area. There is currently capacity at both the police headquarters facility and the station serving the study area. Population growth in the study area is anticipated to occur incrementally, and the Department would be able to plan for long-term

facility needs through the City's capital facilities planning processes.

Additional staffing is currently a higher priority than additional facilities. Additional staff resources could help the Tacoma Police Department to strengthen community policing in the study area now and in the future as the population grows.

Emergency Building Access

The study area and other areas served by the Sector 3 substation currently have a limited number of large multistory buildings. Larger buildings can include a number of police obstructions such as security gates, security doors, elevators and stairs that police must get past in order to respond to a call. Additionally, it can be time consuming for police find the specific location from which a call was made in a large multistory building. For these reasons, an increase in multistory buildings in the study area has the potential to impact police response times. Establishing emergency building access agreements and procedures with building managers in the study area would help to mitigate such impacts.

IMPACTS OF ALTERNATIVE 1 (No Action)

No impacts other than those described under Impacts Common to All Alternatives.

IMPACTS OF ALTERNATIVE 2

The Draft Subarea Plan includes policies intended to strengthen provision of public services in the Tacoma Mall Neighborhood, including police services. Action US-8 calls for coordinating with public service providers to ensure that any plans for new fire, police, school or park facilities in the neighborhood take advantage of opportunities to support the goals of the Subarea Plan. Actions CV-17, CV-18, CV-20 and CV-21 specifically address police services, crime and safety. They call for working with community partners to prevent crime and improve safety, as well making changes to development patterns and building design such as encouraging development on vacant or underutilized lands and integrating Crime Prevention Through Environmental Design (CPTED) into the development regulations for the study area. The Subarea Plan also contains a wide range of goals and actions that support enhancing the public realm including parks and sidewalks, which could lead to more people using and taking ownership of these spaces and a related decrease in criminal activity. If successfully implemented, these policies are expected to have positive impacts on police services.

Crime Prevention Through Environmental Design (CPTED) includes design features such as providing adequate lighting and visibility and orienting buildings toward the street.

MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action

- Under Alternative 2, successful implementation of policy guidance in the Draft Subarea Plan described above would likely have positive impacts on police services in the study area by increasing coordination on planning for police services, engaging community partners in improving safety, encouraging development of underutilized lands, integrating CPTED principles into the development code, and encouraging more people to make use of and take ownership of public spaces.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

- Under both alternatives, ongoing City capital facilities and operational planning efforts are anticipated to address changes in demand for police services, including staffing needs and trends in call service types and locations over time.
- Under both alternatives, a portion of the tax revenue generated from potential redevelopment in the study area would accrue to the City and be used to help fund police services

OTHER MITIGATION MEASURES

Any other mitigation not contained in the categories above

- Under both alternatives, engage in coordination between the Tacoma Police Department, Planning and Development Services and building managers in the study area to establish emergency building access agreements and procedures to help mitigate impacts on police response time related to multistory buildings.
- Under both alternatives, anticipated development of vacant and underutilized parcels in the study area may help to reduce crime.
- Under Alternative 1, consider including CPTED design as a development review criteria for the Tacoma Mall neighborhood, similar to what is proposed under Alternative 2.
- Under Alternative 1, consider increasing current efforts to work with local organizations and neighborhood groups to reduce crime rate and improve public safety, similar to what is proposed under Alternative 2.

- Under Alternative 1, consider enhancing streets and public spaces to encourage more people to make use of and take ownership of these facilities, similar to what is proposed under Alternative 2.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts to police services are anticipated.

3.7.3 SCHOOLS

EXISTING CONDITIONS

SERVICES

Tacoma Public Schools is the fourth largest district in Washington State serving more than 28,000 children in preschool through grade 12th in the City of Tacoma and the greater area, including the study area. In partnership with parents and the community, the District provides a comprehensive educational program designed to be rigorous, individualized and to enable students to contribute to a changing and diverse world. In addition to educational services, the District offers student support services and community resources (Tacoma Public Schools, 2015).

RESOURCE INVENTORY

The District has 35 elementary schools, nine middle schools, five comprehensive high schools, 14 alternative learning sites and a number of facilities used for support services and other purposes. These facilities are located throughout neighborhoods in Tacoma and Fircrest. The District has more than 5,000 employees (Tacoma Public Schools, 2015).

The District has two facilities in the study area: the Madison School and the District Bus Center. The Madison School provides programs including Early Childhood Education and Assistance Program (ECEAP), Family Literacy, Head Start and Indian Education. The District Bus Center is where buses are stored when not in use. The two facilities are located next door to each other at 3101 S. 43rd St. and 4002 S. Cedar St. No elementary, middle or high schools are located within the study area. Based on current District attendance areas, students living within the study area attend Reed Elementary School (1802 S. 36th Street), Giadrone Middle School (4902 S. Alaska Street) and Foss High School (2112 S. Tyler Street; Tacoma Public Schools, 2015).

PERFORMANCE

Graduation rates are a common performance measure for school districts. Tacoma Public Schools has been working to address low graduation rates over the past decade and in 2012 set a new target of reaching an 85% graduation rate by 2020 (Tacoma Public Schools, 2015). This target was significantly higher than the 2010 graduation rate of 58%. Preliminary results show that graduation rates across Tacoma have risen to 85%, thus the District may have already reached the goal set for 2020 (Tacoma Public Schools, 2017).

Foss High School is the high school that students from the study area attend, and it is seeing increases in graduation rates consistent with district-wide trends. Between 2013 and 2015 there was a 4.7% increase in graduation rates, from 64.9% to 69.6%. In 2014, the graduation rate was as high as 74.1% (Tacoma Public Schools, 2017).

Another performance measure for school districts is how students fare on standardized tests. In Washington State, the Measurements of Student Progress (grades three through eight) and the High School Proficiency Exam are used to test students. According to the District's 2013–2014 Performance Report, students in the District scored lower than the state average in all areas of these assessments (Tacoma Public Schools, 2015). Foss High School students scored about the same as the district average in all areas except for End of Course (EOC) math and biology, where they scored lower. Giadrone Middle School students scored at the same level or higher than the district average in all areas. Reed Elementary School students scored worse than the district average in all areas except 3rd Grade reading (Tacoma Public Schools, 2015).

SCHOOL DISTRICT PLANS

The District is currently replacing and modernizing 14 schools and making nearly 200 other improvements to District facilities using bond funds approved by voters in 2013. The 14 schools planned for replacement or modernization have an average age of 74 years and are located throughout the District. None of the schools in the attendance areas for students living in the study area are planned for replacement or modernization, but they are planned for improvements and safety upgrades (Tacoma Public Schools, 2015).

The current bond funds projects through 2021 and the District has capital improvement plans in place through that year. The District is in the early stages of future planning beyond 2021. It is working with a demographer to update enrollment projections and will be conducting building conditions assessments and

master planning in anticipation of starting the process for a new bond request in 2019 or 2020 (Tacoma Public Schools, 2016).

SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

Under both alternatives significant housing growth is expected to occur. As new housing units are developed over time, an increase in the population of public school students in the study area is anticipated. Growth in the study area would likely result in incremental increases in the public school student population and associated incremental impacts on public schools. This would allow the District to respond through ongoing capacity management planning. The District and the City regularly share information such as enrollment projections and population targets and provide input on each other's planning processes to help ensure adequate school services are provided in the City.

The District has a plan in place to meet projected student demand citywide through 2021, by making facility improvements funded by its 2013 bond. The District does not anticipate a need to make school facility improvements in the study area prior to 2021 and is in the process of evaluating longer-term facility needs. In the event of a shortfall in student capacity at the schools serving the study area, the District could address this in several ways such as adjusting school boundaries, adding or removing portables, remodeling existing schools and constructing new schools.

It is possible that the District would redevelop the Madison School facility at some point in the future, but no current plans exist to do so. During the Subarea planning process, community members expressed a desire for the Madison School site to function as a community hub, with part of the school grounds continuing to be made available for public recreational use, as well as public facility improvements such as a library, community center, and additional public parks and open space. The District is open to discussions about the future of the site but has not committed to anything at this time. District staff have indicated an interest in hearing from the community as they undertake their upcoming planning effort in order to understand community interests and priorities.

IMPACTS OF ALTERNATIVE 1 (NO ACTION)

No impacts other than those described under Impacts Common to All Alternatives.

IMPACTS OF ALTERNATIVE 2

The Draft Subarea Plan includes policies intended to increase coordination with the Tacoma School District and to consider opportunities for enhancing school services and other public services and amenities in the study area through redeveloping the existing Madison School site in the community or adding a new school site (Actions US-8, CV-10, CV-11, CV-23 and Goals CV-3 and Cv-6). If successfully implemented, these policies are anticipated to have positive impacts on access to school services and quality of life in the study area.

MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action

- Under Alternative 2, successful implementation of policy guidance in the Draft Subarea Plan described above would likely have positive impacts on school services by enhancing or adding new school facilities in the study area.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

- Under both alternatives, ongoing Tacoma Public Schools capital facilities management planning is anticipated to be sufficient to address increases in student population.
- Under both alternatives, continued sharing of information between the City and the District, including population targets and enrollment projections, is expected to inform each other's long-range planning efforts and help to prevent shortfalls in school capacity.

OTHER MITIGATION MEASURES

Any other mitigation not contained in the categories above

- Under Alternative 2, encourage participation by the City and community stakeholders in the Tacoma Public Schools upcoming Master Planning effort to ensure that the Subarea Plan growth targets and policy guidance are considered.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Any other mitigation not contained in the categories above

No significant unavoidable adverse impacts to schools services are anticipated.

3.7.4 PUBLIC PARKS AND OPEN SPACES AND RECREATION FACILITIES

EXISTING CONDITIONS

SERVICES

Metro Parks Tacoma, the City of Tacoma and other public and private partners work in collaboration to provide active parks and passive open spaces in Tacoma, including the study area. Active parks are intended to meet community needs for a wide range of recreational activities, such as participating in cultural and recreational programs, playing team sports, practicing individual physical activities such as running or bicycling, and playing on play equipment. Passive open space, on the other hand, is intended to be left primarily in its natural state with minimal facility improvements such as soft surface trails and benches. Both Metro Parks Tacoma and the City of Tacoma provide cultural and recreational programming for community members at their facilities (City of Tacoma Planning and Development Services (PDS), 2016).

Parks, open spaces and recreation facilities provide opportunities for adults and children to enjoy healthy and active lifestyles, and at the same time help to knit communities of diverse backgrounds together.

Parks, open spaces and recreation facilities provide opportunities for adults and children to enjoy healthy and active lifestyles, and at the same time help to knit communities of diverse backgrounds together.

RESOURCE INVENTORY

The City of Tacoma contains approximately 1,480 acres of active parks and 3,900 acres of passive open space (City of Tacoma PDS, 2015). Park and open space areas are distributed throughout the City.

Four public parks and open space assets are contained within or intersect with the study area (Figure 3.7-2):

- Lincoln Heights Park is provided by Metro Parks Tacoma and is a neighborhood park of about 2 acres in size with basketball, picnic and play equipment located in the Lincoln Heights District.
- The 40th Street Community Garden is a new community garden a third of an acre in size located next to the Madison School. It is provided through a community-led effort with support from the City of Tacoma and Pierce Conservation District.
- South Park is provided by Metro Parks Tacoma and is an active park located partially within the boundaries of the study area along S. Tacoma Way between S. 43rd St. and S. 48th St. It continues south of the study area. The portion of the park in the study area is about 4 acres and includes landscaped areas, trees and utility buildings. The portion south of the study area includes play equipment, a sprayground, gardens and tree stands. It is located next to the Asia Pacific Cultural Center, which is an important community resource offering classes, meeting space, and cultural events. These resources are located closest to the

Madison District and are a half mile or more from other portions of the study area.

- The Water Flume Line Trail runs through South Park and follows the western border of the study area along S. Tacoma Way. The trail is a bicycle and pedestrian facility providing opportunities for physical activity and is provided by the City of Tacoma.

Other notable green spaces near the study area include the privately owned Tacoma Cemetery and Oakwood Hill Cemetery. These two facilities are located adjacent to each other just south of the study area, next to South Park. They provide visual access to nature and, though not directly accessible from all areas within the study area, are open for walking during certain hours.

Private facilities also play a role in meeting community open space and recreation needs. At least two private spaces serve a community open space function to some degree. The Tacoma Mall has begun to provide outdoor gathering space through recent expansions to the south side of the building. These added two outdoor plaza areas that serve as an entrance to the Mall as well as a place for social interaction and access to fresh air. The Tacoma Friends Meeting, a community group, maintains a Peace Garden that is accessible to community members by invitation. Additionally, private developers may provide private recreational amenities in apartment and mixed-residential buildings.

Five other Metro Parks Tacoma parks and open space resources located about one to two miles from the study area are the STAR Center, Wapato Park, Lincoln Park, Wapato Hills, and the Tacoma Nature Center. Due to their distance from the study area and the presence of obstacles, such as S. Tacoma Way and I-5, these facilities are likely to be accessible from the study area only by car. The STAR Center is located on S. 66th St. and S. Tacoma Way and offers a wide range of recreational activities as part of the SERA (South End Recreation Center) Campus; the 75-acre SERA Campus provides community space and programs offered Metro Parks Tacoma, Tacoma Public Schools and the Boys & Girls Club of South Puget Sound. Wapato Park is located off I-5 on S. 72nd St. and provides amenities such as walking trails around Wapato Lake, an off-leash dog park, picnic shelters, gardens and a play area. Wapato Hills, located just south of the study area at S. 54th and Tacoma Mall Boulevard includes the Skip & Laura Vaughn Playground, hiking trails, basketball courts and ballfield. Lincoln Park just east of the study area at S. 37th St. and S. Thompson Avenue, adjacent to Lincoln High School includes a playground, ballfield, basketball courts and strolling paths. The Tacoma Nature

Center is located off State Route 16 and S. Tyler St., in a 71-acre nature preserve encompassing Snake Lake and the surrounding wetlands and forest. The center offers a variety of nature-related programs and a system of walking trails.

PERFORMANCE

The City's Comprehensive Plan and Metro Parks Tacoma's Green Vision 2030 establish LOS standards for parks and open space. A LOS standard in both plans is that there should be a park within three quarters of a mile of all residents. A gap analysis based on this standard shows that there is a small service area gap in the southeast corner of the study area (Figure 3.7-4). The study area has no parks near its center, but that area is not considered to have a service gap based on adopted LOS standards.

PARKS AND OPEN SPACE AND RECREATION FACILITIES PLANNING

Metro Parks Tacoma's Green Vision 2030 provides long-term strategic direction for providing parks and open space services and achieving its mission to create healthy opportunities for community members to play, learn and grow. The Parks and Recreation Element of the City's 2040 Comprehensive Plan provides the same type of direction for City-provided parks and open space services. Both plans call for increasing access to parks, environmental stewardship and providing programming that supports cultural vitality. Additionally, Metro Parks Tacoma adopted the Mission-Led Comprehensive Program Plan in 2016 to guide program priorities for improvements of services provided to the community over the next six years. This plan focuses on three Mission-Led program areas: active and community wellness, nature and environment, and culture and heritage.

Metro Parks Tacoma and the City have identified a need to maintain and expand parks facilities in the future. Metro Parks Tacoma has over 70 capital projects planned through 2025, according to their current Capital Improvement Plan. Planned projects include improvements to existing facilities and construction of new facilities. One of these projects is for the Lincoln Heights Park and consists of fencing, irrigation, field improvements, playground upgrades, pathway accessibility upgrades, landscaping and signage. Another project is for South Park and includes building upgrades, parking lot lighting, landscaping, site furnishings and drainage improvements. The timeframe and funding sources for these projects have yet to be determined (Metro Parks Tacoma, 2016).

The City of Tacoma 2015–2020 Capital Facilities Program includes ten parks and open space improvement projects as well as over 30 nonmotorized transportation and streetscape projects. Two of these projects are for connectivity and access improvements to the Water Flume Line Trail (City of Tacoma OMB, 2014).

The Subarea planning process brought attention to an existing recognized need for collaboration between the City, Metro Parks Tacoma, parks partners and community members on how best to serve high-density urban centers like the Tacoma Mall RGC, including consideration of the importance of being within walking distance of parks, public places and open spaces and the kinds of amenities and programs desired in compact urban neighborhoods. The City’s Comprehensive Plan calls for establishing specific targets for open space, park and recreation facilities to meet needs in mixed-use centers (P-7.5), and for continuing to work in close partnership with Metro Parks Tacoma including updates to long-term plans for parks and open space systems (Policy P-2.2). Metro Parks Tacoma’s Green Vision Plan also recognizes that there is a need for future park LOS assessment including consideration of parks within walking distance (pg. 36–37). Metro Parks Tacoma’s Mission-Led Comprehensive Plan calls for coordinating planning areas and LOS standards with the City of Tacoma to facilitate information sharing and joint planning (pg. 6), and generally provides guidance that updates to LOS standards should support program improvement needs identified in the plan.

SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

Growth in residential and worker populations in the study area proposed under both alternatives is expected to result in increased use of existing parks, public places and open space facilities in the study area, and corresponding increases in operations and maintenance needs.

Both alternatives are evaluated for the purposes of this EIS based on the currently adopted parks LOS standards. As discussed above, these standards may be updated in the future as a result of coordinated planning between the City, Metro Parks Tacoma, other parks partners and the community. Under the currently adopted LOS standards there is an existing identified need to address a small parks service gap in the southeast corner of the study area. As population grows in the study area, this gap will affect a greater number of people.

Growth is anticipated to occur incrementally under both alternatives. This would allow the City of Tacoma and Metro Parks

Tacoma to respond to corresponding increases in need through ongoing parks and open space resource management planning efforts.

IMPACTS OF ALTERNATIVE 1 (NO ACTION)

No impacts other than those described under Impacts Common to All Alternatives.

IMPACTS OF ALTERNATIVE 2

The Draft Subarea Plan describes the community vision for an integrated system of parks, public places, open space, green infrastructure and public streets that emerged through the planning process. The plan supports a coordinated partnership with Metro Parks Tacoma, the City of Tacoma, other parks partners and the community to achieve the vision and recognizes that integration of the vision into the context of citywide system planning efforts is a first step toward action.

Policy guidance in the Draft Subarea Plan includes collaborating with parks partners to establish a shared definition of LOS standards for urban parks and a shared understanding of how best to serve the parks, public places and open space needs and vision of Tacoma's densest urban centers, as well as adopting the following parks planning principles for the Tacoma Mall Neighborhood. The LOS standards and parks planning principles are meant to be a starting point for future discussion and adoption by parks partners.

Tacoma Mall Neighborhood Planning Principles Proposed for Consideration by Parks Partners

- a park or open space in each of the four Tacoma Mall Neighborhood districts
- located along the Loop Road to create a continuous string of green public spaces
- provides green stormwater infrastructure and tree canopy
- enhances sense of place and urban design
- meets the recreational programming needs of dense urban neighborhood and diverse communities

The Draft Subarea Plan includes an illustrative concept plan for an expanded parks system in the study area based on the parks and public places planning principles proposed for consideration by parks partners, as shown in Figure 2.8. This map is meant to serve as a starting point for discussion about developing new parks in the Tacoma Mall Neighborhood based upon public placemaking and urban design principles articulated in the Subarea Plan. Future parks are not likely to be in these exact

locations, configurations or sizes. Once parks facilities priorities were determined by parks partners, acquisition of future parkland would take place over time based on the availability of grants and other funding sources. The Draft Subarea Plan also recognizes the public open space, placemaking function and cultural value of carefully located public places in the Tacoma Mall Neighborhood not captured by current parks typologies or LOS standards.

The Draft Subarea Plan includes policy guidance to collaborate with parks partners to develop plans, implementation, funding and maintenance strategies for a network of parks, public places and open spaces in the Tacoma Mall Neighborhood. Additional policy guidance includes coordinating with the Tacoma School District about the potential use of the Madison School site for parks or other public uses, as discussed under School Services, exploring options for relocating the 40th St Community Garden out of the right-of-way in order to reconnect the street grid at this location, working with private developers to provide parks and open spaces, and engaging with the community to create recreational opportunities for all ages, household types, cultural backgrounds, income levels and interests.

Development of new parks and open space facilities and programming based on the policy guidance in the Draft Subarea Plan would require significant capital investments. Metro Parks Tacoma is the primary provider of parks and open space services in Tacoma and may be able to provide some of the new services, but the City would likely need to partner with additional partners as well. Metro Parks' current service model does not support a large number of small parks in close proximity to each other. Other potential providers of public parks and open spaces for the study area include the City of Tacoma, private developers, nonprofits and community organizations.

MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action

- Under Alternative 2, successful implementation of policy guidance in the Draft Subarea Plan described above would likely have positive impacts on parks and open space services by expanding facilities and programming in the study area through collaboration with parks partners.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

- Under both alternatives, ongoing parks and open space resource management planning efforts would allow the City and Metro Parks Tacoma to plan for changes in demand for parks and open space and in facilities maintenance and development needs over time.

OTHER MITIGATION MEASURES

Any other mitigation not contained in the categories above

- Under Alternative 1, continue the ongoing discussion about how best to serve high-density urban centers like the Tacoma Mall RGC, including consideration of new LOS standards for urban parks, similar to what is proposed under Alternative 2.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts to parks and open space services are anticipated.

3.7.5 SOURCES

City of Tacoma Fire Department, Annual Report, 2014.

City of Tacoma Fire Department, Facilities Master Plan Overview, 2011.

City of Tacoma Fire Department, Personal communication with staff, August 2015.

City of Tacoma Fire Department, Personal communication with staff, March and June 2016.

City of Tacoma Office of Management and Budget, 2015–2016 Adopted Biennial Operating & Capital Budget, December 2014.

City of Tacoma Office of Management and Budget, 2015–2020 Capital Facilities Program, December 2014.

City of Tacoma Planning and Development Services, Comprehensive Plan, December 2015.

City of Tacoma Police Department, Personal communication with staff, March 2016.

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Existing: Tree Canopy
November 2016

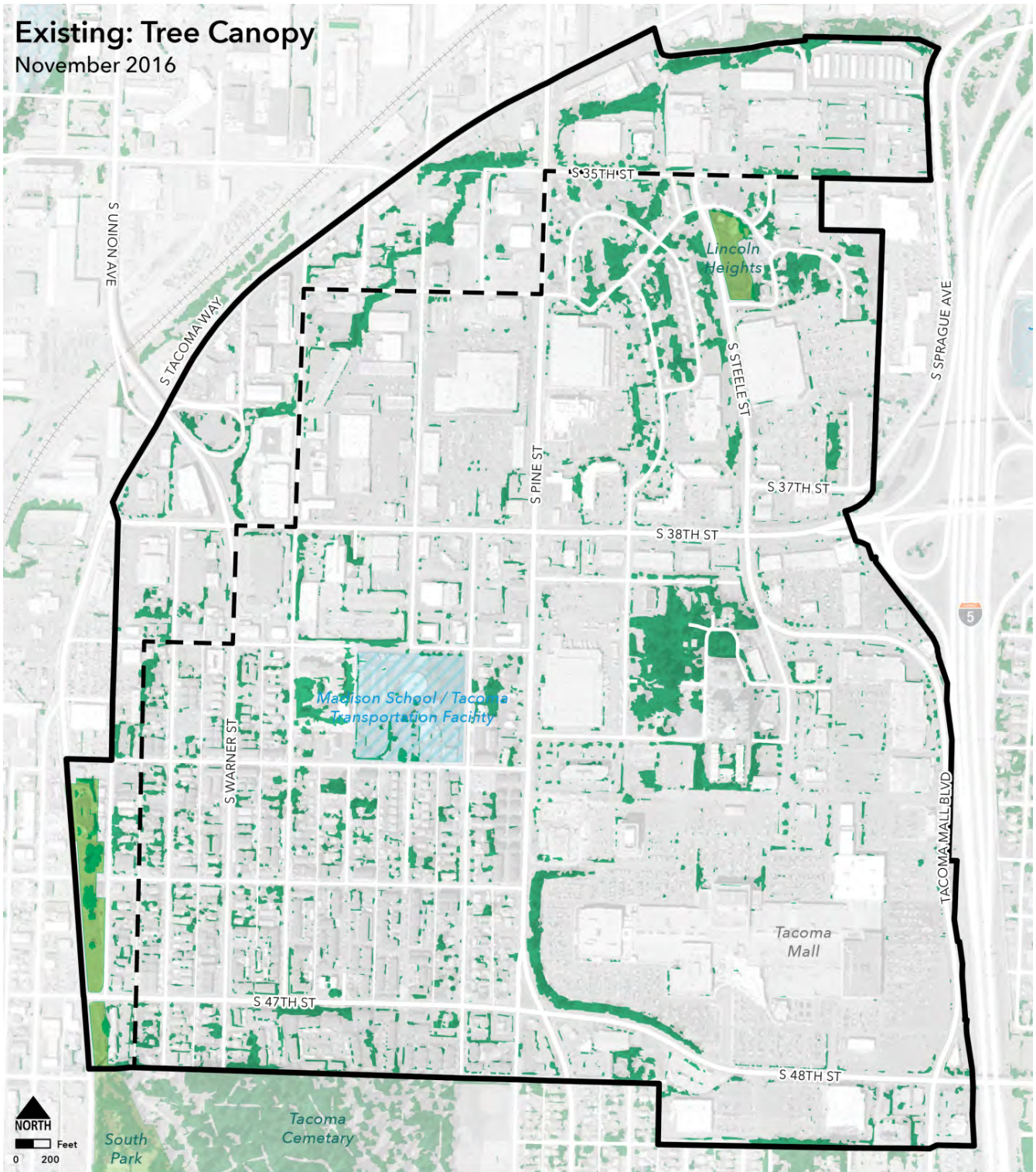
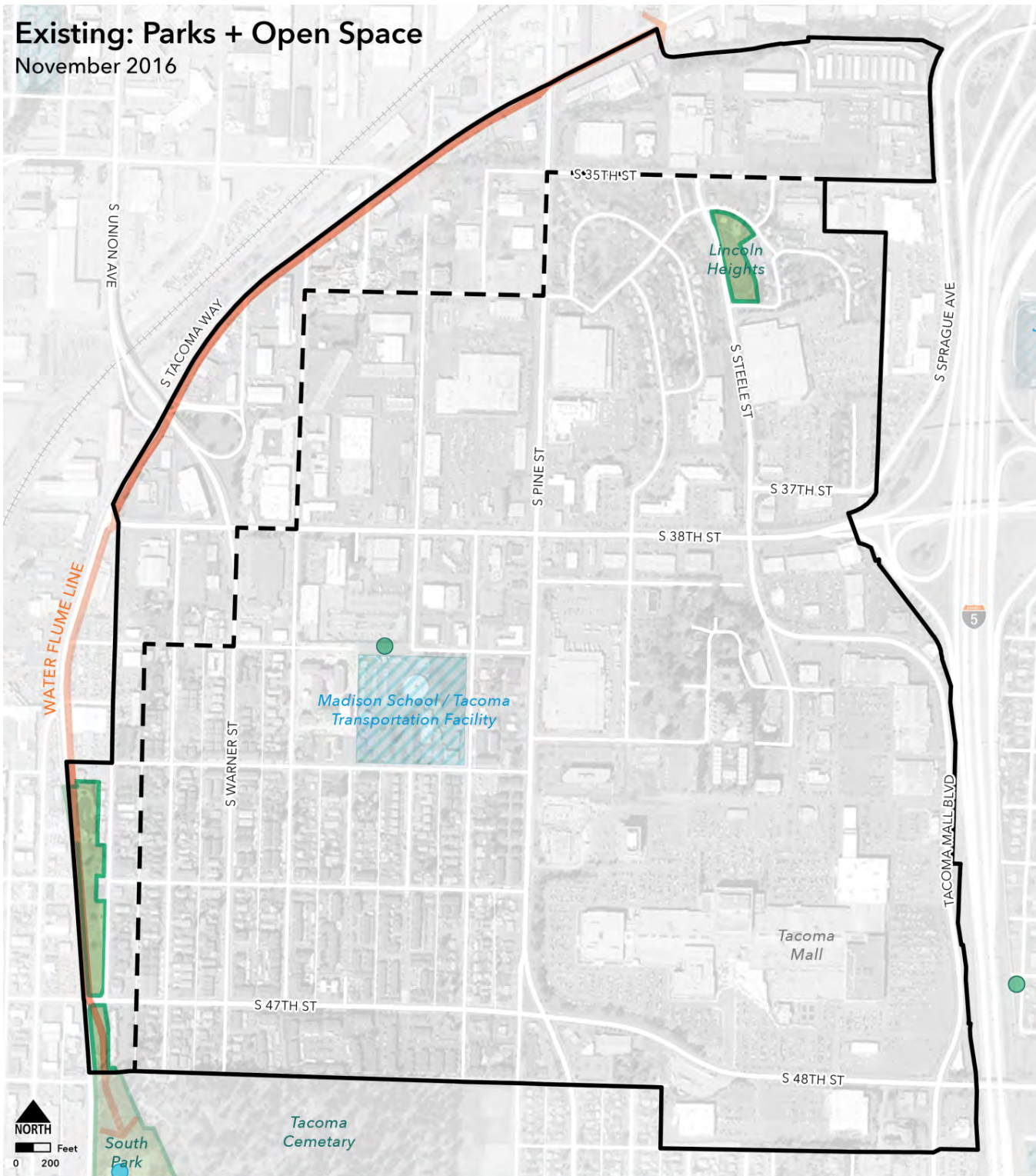


Figure 3.7.2. Existing Forest Canopy and Parks
Source: City of Tacoma, 2016; 3 Square Blocks, 2016.

Existing: Parks + Open Space

November 2016



LEGEND

- | | | | |
|-------------------------------|--------------------|-------------------|-------------------------------|
| Expanded Neighborhood Subarea | Parks + Open Space | Community Garden | Acreage within Subarea |
| Existing RGC Boundary | Schools (Public) | Community Centers | Active Parks: 1.8 acres |
| Active Use Facility | Signature Trail | | Passive Open Space: 0 acres |

Figure 3.7.3. Existing Parks and Open Spaces
 Source: City of Tacoma, 2016; 3 Square Blocks, 2016.

Existing Conditions: Active Parks Gap Analysis

June 2016

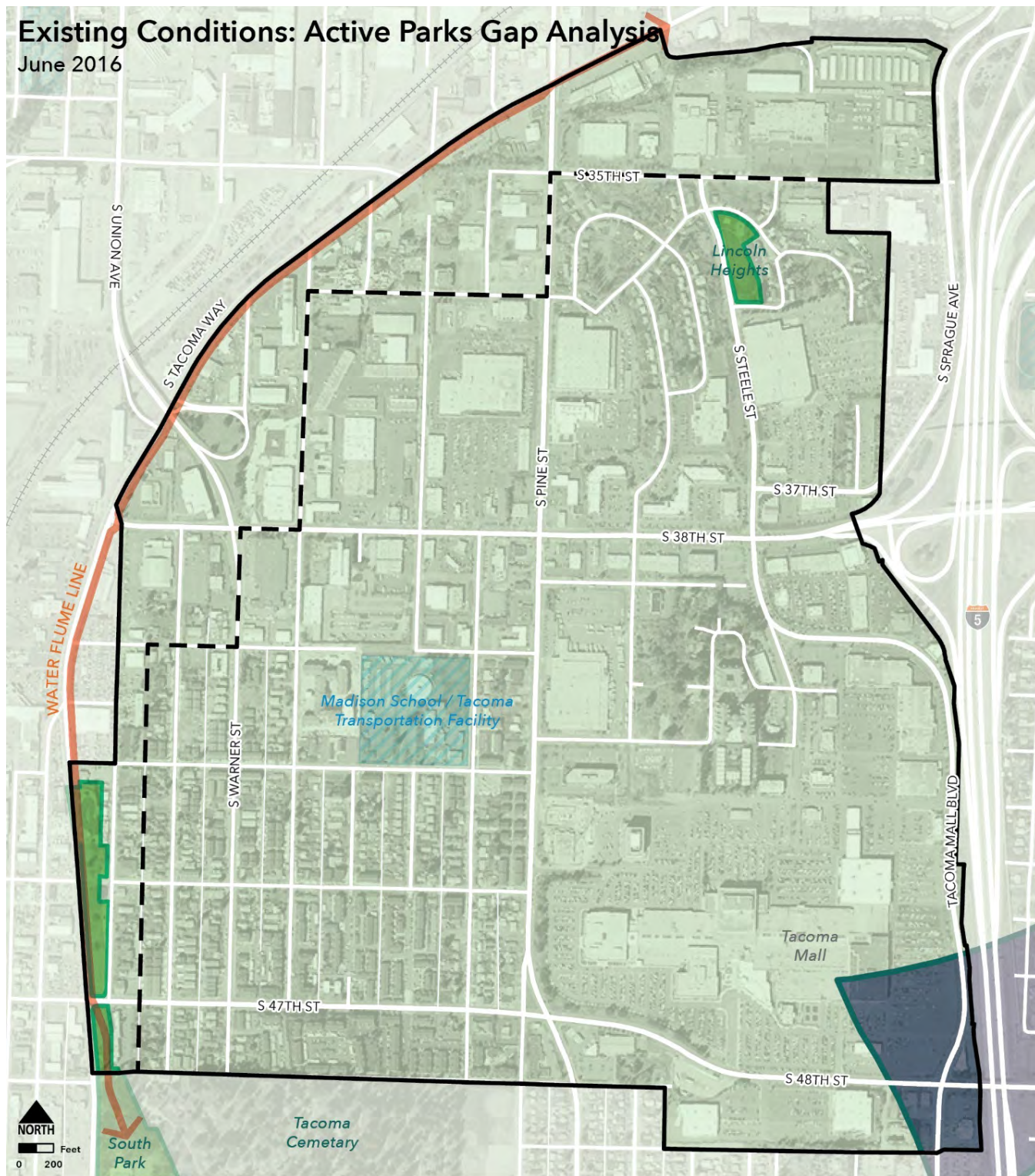
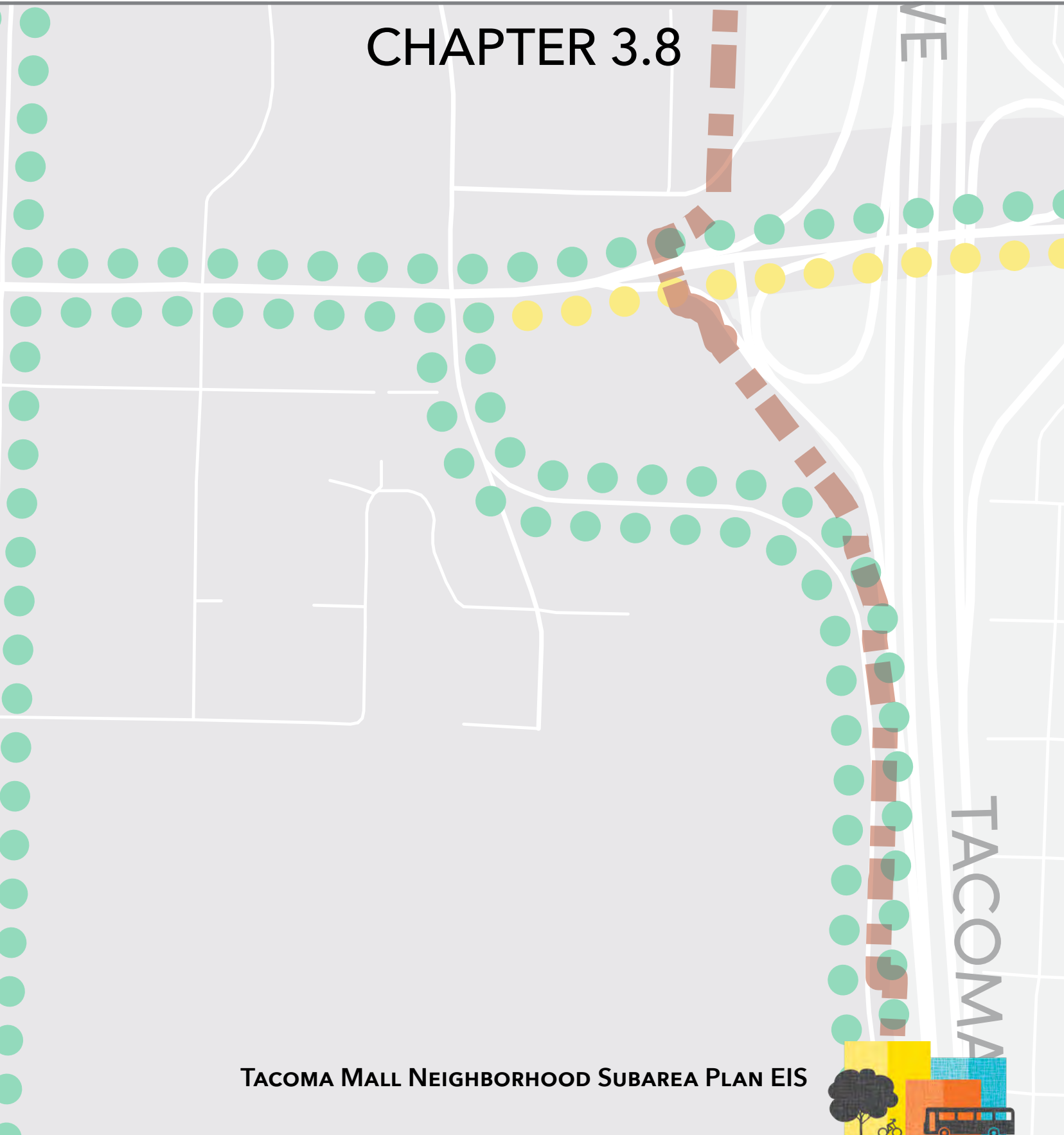


Figure 3.7.4. Existing Active Parks Gap Analysis

Source: City of Tacoma, 2016; 3 Square Blocks, 2016.

UTILITIES & STORMWATER

CHAPTER 3.8



TACOMA MALL NEIGHBORHOOD SUBAREA PLAN EIS



CHAPTER 3.8



UTILITIES & STORMWATER

3.8.1 INTRODUCTION

This section describes the existing status of utility service and evaluates the impacts of household and employment growth on utility service within the Tacoma Mall Neighborhood study area. Utilities discussed in this section include water, wastewater, stormwater, electricity, natural gas, solid waste, and telecommunications. Generally, the study area is well served by existing utilities, with some system upgrades anticipated for aging water, wastewater, and stormwater infrastructure (primarily pipe systems).

Table 3.8-1 displays the purveyors for each of the key utilities serving the study area. A description of each service provider follows the table.

Table 3.1-1 **Utility Providers**

Utility	Provider
Water	Tacoma Public Utilities, Tacoma Water division
Wastewater	City of Tacoma Environmental Services Department
Stormwater	City of Tacoma Environmental Services Department
Electricity	Tacoma Public Utilities, Tacoma Power division
Natural Gas	Puget Sound Energy
Solid Waste	City of Tacoma Environmental Services Department
Telecommunications	Tacoma Public Utilities (Click! division) and private providers

Source: ESA, 2016

Tacoma Public Utilities (TPU) was formed in 1893 when the City of Tacoma purchased the water and electrical systems from the Tacoma Water and Light Company. TPU provides water and electricity to the greater Tacoma area, including the study area, as well as telecommunications and freight rail services. The Tacoma City Charter provides for TPU to be governed by a five-member Public Utility Board. The Tacoma City Council appoints the five Public Utility Board members to five-year terms. While the Public Utility Board is the governing body and provides policy guidance, some matters, such as issuing bonds and fixing utility rates, also require formal Tacoma City Council approval. TPU operates as Tacoma Water, Tacoma Power (which includes the telecommunications section, operating as Click! Network), and Tacoma Rail (City of Tacoma, 2015a).

City of Tacoma Environmental Services Department provides wastewater management, solid waste management, and surface water management across the City. The Environmental Services Department has oversight from the City Council, City Manager, and the Environmental Services Commission. The Environmental Services Commission was established to review and make recommendations to the Environmental Services Department, as well as the City Council and City Manager, on wastewater, surface water and solid waste rates and rate structures, as well as services, policies and programs developed by the Environmental Services Department. The Environmental Services Department operates consistent with their 2013–2018 Strategic Plan, which establishes vision, mission and values; provides goals and objectives; establishes LOS standards, and aids in decision-making (City of Tacoma, 2014a).

Puget Sound Energy (PSE) provides natural gas service to Tacoma residents and businesses. PSE is a private utility providing natural gas and electric service to homes and businesses in the Puget Sound region of Western Washington and portions of Eastern Washington, covering eight counties and approximately 6,000 square miles.

3.8.2 WATER SYSTEM

EXISTING CONDITIONS

Tacoma Water, a division of TPU, provides potable water to residences, businesses, and industries located in the cities of Tacoma, University Place, Ruston and portions of the cities of Puyallup, Bonney Lake, Fircrest, Federal Way, and portions of Pierce and King Counties. TPU also provides wholesale water supplies to independent water purveyors operating in Pierce and King Counties, and is a participant in a regional partnership known as the Regional Water Supply System formed by

Tacoma Water, the Lakehaven Utility District, the City of Kent and the Covington Water District. Tacoma Water sources its water primarily from the surface waters of the Green River and groundwater sources in the Green River watershed. As reported in the Executive Summary of Tacoma Water’s 2006 Comprehensive Water System Plan, TPU owns wells located in and around the city with a “short-term combined pumping capacity of approximately 60 million gallons a day (mgd)” (TPU, 2007). This is understood to suggest that this is the maximum capacity of TPU wells in and around the City, and that sustained pumping at this maximum capacity does not frequently occur. Four wells are located within the study area (City of Tacoma, 2014b; TPU, 2007):

- Well #9A—4.5 mgd sustained withdrawal rate, located at Tacoma Mall Center (S. 36th St. and S. Lawrence Street);
- Well #12A—4.3 mgd sustained withdrawal rate, located at S. 36th St. & S. Pine Street;
- Well #6B—6.1 mgd sustained withdrawal rate, located at S. 43rd St. & S. Tacoma Way (reported as 4.2 mgd capacity in City of Tacoma, 2014b); and
- Well #11A—8.3 mgd sustained withdrawal rate, located at S. 43rd St. & S. Tacoma Way.

These wells and other wells in and near the City (collectively referred to as the Service Area Wells within the 2006 Comprehensive Water System Plan) serve to augment water supply provided by the Green River during low water periods, generally in summer months. On an annual basis, these groundwater sources supply approximately 15% of TPU’s total annual water supply need (TPU, 2007). When operational and pumping, Service Area Wells within the study area draw groundwater and provide water supply along with supply from the Green River. Together, these supplies support fire flows and domestic use throughout the Tacoma Water service area. Together, Tacoma Water’s current available water supply (110 million gallons per day) far exceeds the average use (55 million gallons per day) (Tacoma Water website, 2016).

Citywide, Tacoma Water’s facilities include distribution mains, distribution lines, pump stations, reservoirs, standpipes and 20 wells (TPU, 2007; City of Tacoma, 2015a). Almost two-thirds of these in-City wells are within the South Tacoma area (referred to by Tacoma Water as the South Tacoma wellfield), extending to the south of the study area. The water supply system in the study area includes a combination of cast iron, ductile iron, and asbestos cement (AC) pipe. The AC pipe is located mostly in the Lincoln Heights area in the vicinity of Lincoln Heights Park (Figure 3.8-1). The water system was installed over the years to meet fire hydrant spacing and fire flow requirements to serve

WHAT ARE EQUIVALENT RESIDENTIAL UNITS (ERUs)?

The use of equivalent residential units (ERUs) is a method to express water use by non-residential customers as an equivalent number of residential customers, to derive total gallons per day LOS for the population.

IMPACTS OF ALTERNATIVES 1 (NO ACTION) AND 2 (ACTION ALTERNATIVE)

Alternative 1 (No Action) would maintain the existing RGC boundaries and growth targets, as well as the City's current development regulations for the subarea. Alternative 2 (Action Alternative) proposes to expand the RGC boundaries, increase growth targets for the subarea to account for this expansion, and to adopt and implement the Tacoma Mall Neighborhood Subarea Plan including changes to zoning and development regulations.

existing development. Within the study area, the water distribution mains range in size from six inches to 12 inches in diameter, and there is a 30-inch water transmission main in S. Lawrence St. Water pressure ranges from 35 to 75 pounds per square inch (psi) (email communication with G. Whitley, 2015 and 2016). Water fire flow capacity in the study area is provided via the main in S. Lawrence St. and is adequate for future growth. Development is required to pay for and provide all water service infrastructure required as a result of the development.

The City's adopted LOS standard for water is 442 gallons per day (gpd) per Equivalent Residential Unit (ERU). The 442 gpd per ERU represents a four-day peak period demand, with a peak factor of 2.01 times the actual average daily residential water consumption of 220 gpd per ERU. The four-day peak water demands drive the new water system facility requirements for meeting new customer growth. The four-day peak (maximum) is defined as the average use per day of the four highest consecutive days of water use in the summer months (City of Tacoma, 2015a and 2014b).

Based on Tacoma Water demand forecast, the current Tacoma Water water supply facilities have sufficient capacity to meet projected growth rates until 2060 (City of Tacoma, 2014b).

SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

Due to similarities in anticipated growth under both alternatives, corresponding increases in water utility demand would be similar.

Both alternatives would increase the demand for water, and higher growth would correspond to higher demands on the water supply. However, the capacity of the existing utility in the study area exceeds demand, and adopted LOS standards for water flow and pressure are anticipated to be met with existing water supplies and adequately routed through the existing water transmission main (in S. Lawrence Street) and distribution mains infrastructure. While some localized capacity upgrades could be required to supply new development, no major new projects or initiatives are anticipated to be necessary for projected growth within the subarea. Localized improvements to water distribution mains necessary to support specific development projects would be funded and completed by the developer consistent with City of Tacoma concurrency standards.

IMPACTS OF ALTERNATIVE 1 (NO ACTION)

No impacts other than those described under Impacts Common to All Alternatives.

IMPACTS OF ALTERNATIVE 2

The Draft Subarea Plan includes policy guidance to support provision of public services in the study area. Goal US-1 calls for ensuring that utilities are available at an appropriate LOS to support the neighborhood's existing and planned development. This is consistent with current City practices. Successful implementation of this goal is anticipated to have positive impacts on water service as the Draft Subarea Plan is implemented over time.

MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action

- Under Alternative 2, successful implementation of Goal US-1 is expected to help ensure adequate provision of water services in the study area. Proposed development in the subarea would be reviewed for consistency with this goal and other policy guidance in the Subarea Plan, as well as any associated regulatory requirements.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

Under both alternatives, TPU currently plans to replace aging cast iron water pipes ranging in size from six inch to 12 inch diameter located in Union Avenue from S. 38th St. to S. 47th Street (personal communication with Tacoma Public Utility staff [G.Whitley], August 2015). The segments planned for replacement are shown in Figure 3.8-1.

- Under both alternatives, proponents of future development will be required to pay for utility system improvements necessary to facilitate the development projects.

OTHER MITIGATION MEASURES

Any other mitigation not contained in the categories above

- Under both alternatives, continue ongoing water conservation measures and programs within the Subarea, as supported by One Tacoma Comprehensive Plan Policy PFS-7.10 (Promote water reuse and water conservation opportunities that diminish impacts on water, wastewater, and surface water systems). Implement programs to

educate water users on conservation measures at home and at work, and encourage implementation of emerging approaches to conserve water, including use of incentives programs.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts are anticipated related to the projected growth in demand for domestic water service within the Tacoma Mall Neighborhood study area.

3.8.3 WASTEWATER

EXISTING CONDITIONS

City of Tacoma's Environmental Services Department provides sanitary sewer service to Tacoma, Ruston, Fircrest, Fife, Milton, and parts of unincorporated Pierce County. The City owns two wastewater treatment plants: the Central Wastewater Treatment Plant (CTP) and the North End Wastewater Treatment Plant (NETP), as well as sanitary sewer pipes and pump stations. The City also has an agreement with Pierce County to use their Chambers Creek Facility for sewage treatment (City of Tacoma, 2015a). Wastewater from the entire study area flows to the Central Wastewater Treatment Plant (CTP) located on the southwest shoreline of the Puyallup River below the State Route 509 bridge, and accessed via East Portland Avenue and Cleveland Way.

Capacity in the City's wastewater system for collecting and treating wastewater is a function of both the quantity of flow generated by the City's customers and the amount of inflow and infiltration of stormwater runoff and groundwater that enters the wastewater collection system through cracks in pipes or other defects. Inflow refers to sources of stormwater runoff (roof, foundation and yard drains, and other stormwater pipes) entering sanitary sewers from inappropriate connections, with highest levels of inflow occurring during storm events. Infiltration refers to groundwater entering sanitary sewers through defective pipe joints, cracks, or broken pipes; typically, as the infrastructure ages, defects allow for increasing infiltration. The wastewater system within the study area includes concrete, PVC and cured in place pipe (CIPP) ranging in age from 2 to 75 years old, with the majority of the sanitary pipes installed in the 1940s and 1950s. A few years ago, about 32% of the system in the study area was rehabilitated.

Wastewater is conveyed by gravity in pipes ranging in size from eight-inch to 18-inches in diameter (Figure 3.8-2). Though the study area has no major pump stations or trunk mains, the area south of S. 38th St. flows through a large pump station behind the Tacoma Public Utility building.

The LOS standard for wastewater is 200 gallons per capita for each day during the maximum month wastewater flow. In addition, the City has a daily 400 gallons per capita LOS standard for peak hydraulic capacity (the capacity for a peak instantaneous flow). These LOS standards are subject to state and City concurrency standards (City of Tacoma, 2015a and 2014b). As reported in the City's 2015 One Tacoma Comprehensive Plan, the existing "treatment capacity, and the capacity of the overall collection system, is sufficient to meet anticipated demand for the next six years or more" (City of Tacoma, 2015a). The One Tacoma Plan goes on to stipulate that "collection system capacity is not uniformly distributed throughout the system and no guarantee can be made that there is capacity in every line for every new development." Across the City's wastewater system service area, the Tacoma 2015 Capital Facilities Program details that \$47-million in collection system project spending is anticipated between 2015 and 2020 (more than 50% of all wastewater capital project spending). All funding for these projects is from utility participation fees (City of Tacoma, 2014b).

SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

Due to similarities in anticipated growth under both alternatives (see Draft EIS Chapter 2), corresponding increases in wastewater utility demand would be similar.

It is not anticipated that growth associated with the No Action or Action Alternative would result in significant capacity implications for the existing conveyance systems or result in temporary or permanent reduction in LOS for residents or businesses within the study area. City of Tacoma Environmental Services Department would continue its practice of developers upgrading the utility with anticipated growth throughout their service area to ensure adequate infrastructure is provided. While there would be increased demand on the wastewater system under either alternative, the Environmental Services—Wastewater Department follows city policy to address system capacity issues and to incorporate improvements and repairs in association with City infrastructure projects and other major development activities (City of Tacoma, 2014a and 2015b). Due to sufficient capacity within the existing wastewater treatment plant, and ongoing Environmental Services Department programs and planning, increased demand for wastewater service under either alternative is not considered a significant impact.

WHAT IS CONCURRENCY?

Concurrency ordinances are legal requirements for a development to assess whether the existing public infrastructure and services are adequate to support the increased demands generated by the proposed development. If adequate facilities are not in place, the applicant is required to provide the additional facilities needed, wait until adequate facilities are available, or provide some form of alternative mitigation (often a financial contribution to offset demands on the system).

As detailed above, the City's treatment plants have capacity available to absorb anticipated growth in utility customers and still meet wastewater treatment LOS requirements for the next six years. As growth across the service area approaches existing capacity, the Environmental Services Department will continue to make improvements to wastewater collections systems, the CTP, and the NETP. Improvements will be completed consistent with the current 2015–2020 Capital Facilities Program (City of Tacoma, 2014b), future capital facilities program updates, and policies within the One Tacoma Comprehensive Plan (City of Tacoma, 2015a). Consistent with concurrency requirements, proponents of new or redevelopment may be required to upsize systems based on new peak flows, including consideration of future upstream conveyance conditions. These developer-funded and implemented conveyance system improvements will be paired with City implementation of 2015–2020 Capital Facilities Program project priorities for both wastewater conveyance and treatment systems, as supported by utility participation fees.

IMPACTS OF ALTERNATIVE 1 (NO ACTION)

No impacts other than those described under Impacts Common to All Alternatives.

IMPACTS OF ALTERNATIVE 2

The Draft Subarea Plan includes policy guidance to support provision of public services in the study area. Goal US-1 calls for ensuring that utilities are available at an appropriate LOS to support the neighborhood's existing and planned development. This is consistent with current City practices. Successful implementation of this goal is anticipated to have positive impacts on wastewater service as the Draft Subarea Plan is implemented over time.

MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action

- Under Alternative 2, successful implementation of Goal US-1 is expected to help ensure adequate provision of wastewater services in the study area. Proposed development in the subarea would be reviewed for consistency with this goal and other policy guidance in the Subarea Plan, as well as any associated regulatory requirements.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

- Under both alternatives, wastewater system improvements will occur over time, including replacement and upsizing of aging sanitary sewer pipes and extensions as a result of new development or redevelopment (Dressler, 2016;; personal communication with City Environmental Services staff, August 2015).
- Under both alternatives, wastewater system capacity determinations and upgrade requirements will be made by the City on a case-by-case basis for development projects resulting in greater than 20 dwelling units, and commercial or industrial developments that will result in a peak daily flow of more than 5,000 gpd.

OTHER MITIGATION MEASURES

Any other mitigation not contained in the categories above

- Under both alternatives, new development and redevelopment may reduce per-capita water demand (and therefore, wastewater service demand) by using newer, low- or no-flow plumbing fixtures and equipment.
- Under both alternatives, ongoing implementation of TPU's *Ways to Save at Home* program may extend per-capita water demand reductions to existing residences within the study area.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts are anticipated related to the projected growth in demand for wastewater service within the Tacoma Mall Neighborhood study area.

3.8.4 ENVIRONMENTAL CONDITIONS, WATERSHEDS, AND STORMWATER

EXISTING CONDITIONS

CONTAMINATED SITES

The Tacoma-Pierce County Health Department and the Washington State Department of Ecology monitor contamination of soil and groundwater in Pierce County. Their records show two contaminated sites in the study area (Figure 3.8-5). The northernmost site is located at the north end of S. Lawrence St. and has contaminated soil and groundwater. The other site, located in the Madison District near the northeast corner of S. Warner St. and S. 45th St., has soil contaminated

with arsenic and metal pollutants (Tacoma-Pierce County Health Department, 2015).

Leaking underground storage tanks (UST) are a common source of soil and groundwater contamination. USTs are used by gas stations and other businesses to store and manage hazardous materials on site. Hazardous materials can leak from USTs that have not been properly maintained or have been abandoned. Figure 3.8-5 shows sites where abandoned underground storage tanks may be present based on site history. Five recorded UST sites are within the study area, two of which are in the existing Tacoma Mall Neighborhood Regional Growth Center north of S. 38th St. between S. Pine St. and S. Cedar St.

GROUNDWATER CONDITIONS

Stormwater infiltration generally refers to systems that direct clean runoff into soils with high groundwater recharge rates, replenishing aquifers and reducing surface runoff volumes.

In 2015, Robinson Noble conducted a geologic assessment of the Tacoma Mall subarea describing the geologic context and stormwater infiltration potential in different parts of the study area. The surface geology of the Tacoma Mall Subarea is glacial in origin and consists of four primary units. Three of the units—Steilacoom gravels, Vashon advance outwash, and Vashon recessional outwash—are highly permeable, coarse grained sand and gravel deposits. Where these deposits occur without overlying impervious cover, precipitation is likely to infiltrate to the groundwater table. The fourth unit, Vashon till, is a low-permeability layer of silt and clay-bound sand. Precipitation onto areas of Vashon till is not likely to infiltrate quickly, resulting in surface runoff. Of these, highly permeable Steilacoom gravel (occurring generally in the western portion of the study area) and low-permeability Vashon till (occurring generally in the eastern portion) are the most prevalent geologic units in the subarea (Robinson Noble 2015).

Areas of Steilacoom gravel deposits range from ten feet to more than thirty feet thick, with infiltrated stormwater migrating generally westward toward the South Tacoma Channel west of the study area. Infiltrated flows recharge to aquifer resources within South Tacoma Aquifer System, which consists of several aquifer units separated by intervening aquitard soil units (Robinson Noble, 2015).

Due to these geologic conditions, the western portion of the study area and portions of the eastern portion provide opportunity for groundwater recharge; in these areas, infiltration of stormwater may have the potential to help minimize localized flooding and reduce peak flows to downstream resources. The prevalence and depth of highly permeable soils, and the minimum approximately 30-foot separation from the ground surface down to the most shallow groundwater contour elevations suggest stormwater infiltration as an effective

Groundwater recharge is the process through which surface water moves downward to enter the groundwater aquifer.

management strategy within the majority of the study area (Robinson and Noble, 2015).

The entire study area is located within the South Tacoma Groundwater Protection District (STGPD) that was created to protect the quality of water within the South Tacoma aquifer, an important source of drinking water for the City. The City uses the South Tacoma aquifer as drinking water supply, supplying as much as 40% of the total water demand during periods of peak summer use (on an annual basis, all TPU wells in and near the City provide approximately 15% of the utility's total annual water supply need; TPU, 2007). The STGPD program is managed by the Tacoma-Pierce County Health Department. Requirements for the STGPD are established through TMC 13.09 and Tacoma-Pierce County Health Department guidelines. Facilities that use, store, dispose or otherwise handle hazardous materials, have a stormwater infiltration unit on-site and are not categorically exempt must submit a STGPD permit application for review by the Health Department (City of Tacoma, 2015a; Memo from City of Tacoma Public Works and Tacoma-Pierce County Health Department, 2011).

LAND COVER CONDITIONS

The quantity and quality of stormwater runoff is highly dependent on land use, traffic, and particularly on the amount of effective impervious surface. Effective impervious surfaces are defined in this document as hard surfaces (typically pavement or buildings) that allow no infiltration into the soil and contribute directly to the stormwater conveyance system. High amounts of impervious surfaces lead to more stormwater runoff and higher stormwater peak flows. Streets, parking lots and other transportation structures make up the bulk of impervious surface area in most watersheds and collect pollution such as heavy metals, grease and oils. Stormwater runoff from these surfaces can transport these pollutants to streams, lakes and other waterbodies.

Impervious surfaces, which cover more than 70% of the study area, dominate stormwater runoff processes in the study area, with runoff conveyed out of the study area after draining to catch basins and flowing through pipe infrastructure. The high level of imperviousness and lack of stormwater water quality treatment indicates that this area is likely a source of stormwater-borne contaminants to downstream receiving waters, such as pathogens, nutrients, metals and organics.

Stormwater conditions also experience impacts from the presence of trees. Trees can reduce stormwater runoff by capturing and storing rainfall in their root zones and canopy, slowing

WHAT IS TREE CANOPY?

The tree canopy is the extent of the outer layer of leaves of an individual tree or group of trees.

runoff and providing filtration that improves water quality. In the study area, the urban forest canopy cover is less than 10% of the area (Figure 3.7-2). Limited public parks and open spaces exist within the study area and comprise less than 7 acres with little forest canopy. See Chapter 3.7—Public Services for additional information on parks and open spaces.

Privately owned lands with urban forest cover are also limited within the study area. A contiguous block of forested property is located north of Tacoma Mall, made up of up of larger lot residential uses and vacant properties. The only other areas where tree canopy is present is within the single-family residential neighborhoods in the Lincoln Heights and Madison districts. Even within these single-family areas, however, existing development patterns have resulted in very low urban forest canopy and moderately high levels of impervious surface cover.

Compared with paved and built areas, all pervious areas within the study area (and urban forest areas in particular) have greater potential to intercept rainfall, reducing surface water inputs to adjacent stormwater systems. Table 3.8-2 summarizes impervious surface and forest canopy cover within each basin.

Table 3.8.1. Total Impervious Surface within Tacoma Mall Study Area

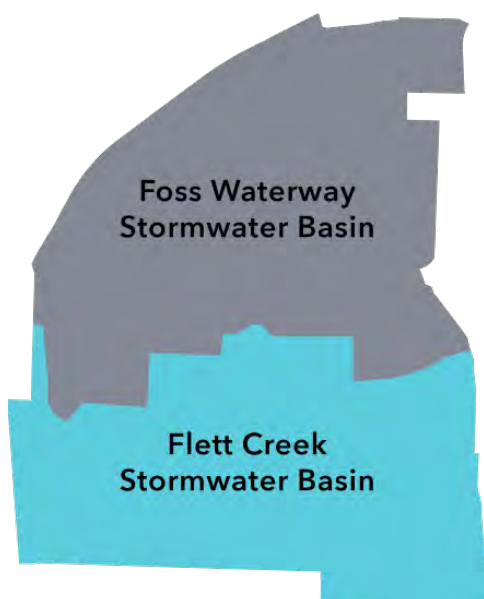
Basin	Tacoma Mall Neighborhood Study Area (acres)	Total Impervious Area		Total Forest Canopy Area	
		Acres	%	Acres	%
Thea Foss Waterway	267	196	73%	24	9%
Flett Creek	333	237	71%	33	10%

Source: City of Tacoma GIS Data, provided in 2015.

Watershed Context

Storm drainage from the study area is divided approximately in half between two of the City’s nine watersheds. The northern portion of the study area is within the Thea Foss Waterway watershed, discharging surface runoff north and east to the Thea Foss Waterway. The southern portion of the study area is within the Flett Creek watershed, discharging stormwater south toward Flett Creek before draining to Chambers Creek and out to Chambers Bay (Figure 3.8-3; City of Tacoma, 2012).

The Thea Foss watershed includes residential and commercial land uses, the I-5 corridor, and the Thea Foss Waterway that supports industrial and commercial businesses. The basin



extends across the northern half of the study area, including areas surrounding S. Steele St. and the intersection of S. Pine St. and S. 38th St. that primarily support commercial uses (Figure 3.8-4).

The Flett Creek watershed is predominantly residential, with commercial and light industrial uses in localized areas. The basin extends across the southern half of the study area, including the majority of the existing Tacoma Mall area and the Madison District to the west. Critical issues in the Flett Creek basin include typical water quality issues associated with runoff from urban development, historic loss of wetlands, reduction of groundwater recharge, and alterations to stream channels and riparian forest. Existing centralized stormwater management facilities in the lower Flett Creek Basin, including the detention pond at 2517 S. 84th St., Lakewood WA (aka Gravel Pit), Flett Creek holding basins, provide flow control downstream of the study area.

Stormwater Infrastructure

Stormwater infrastructure in the study area comprises mostly concrete and PVC pipes ranging from 2 to 70 years old. The majority of the stormwater infrastructure was installed between the 1960s and 2000s, and is conveyed by gravity in pipes ranging in size from four inch to 48 inch in diameter (Figure 3.8-4). The study area has no major pump stations. Because most of the City's stormwater system was constructed before stormwater regulations required construction of stormwater treatment and flow control facilities, most runoff from the study area discharges untreated into the Thea Foss Waterway and Flett Creek.

According to recent system modeling completed by the City, some areas of the existing stormwater system do not have capacity to sufficiently convey stormwater runoff to meet City stormwater level of service (LOS) standard (City of Tacoma, 2015b). The LOS standard requires a minimum 0.5 feet of vertical distance (or "freeboard") between the water surface and the top of any manhole / catch basin for a 25-year, 24-hour design storm. The vertical distance provides a measure of safety intended to compensate for extreme events or unknown factors that could cause water levels to overcome system design, resulting in localized flooding. The adopted LOS standard allows overflow (typically as shallow water on the edge of roadways) of the pipe conveyance system for the 100-year, 24-hour design storm, but requires that the additional flow shall not extend beyond half the lane width of the outside lane of travel and shall not exceed four inches in depth at its deepest point (City of Tacoma, 2015b).

WHAT IS A "DESIGN STORM"?

To understand the stormwater conveyance capacity of existing or proposed facilities, the City models flow levels for big rain storms occurring over a 24-hour period.

A 25-year, 24-hour design storm represents a rain storm that has a 1-in-25 chance of occurring in any given year. A 100-year, 24-hour design storm represents a rain storm that has a 1-in-100 chance of occurring in any given year.

By looking at system capacity for these peak rain storm events, the City can anticipate areas where localized flooding can be expected and address issues before they occur.

Study results identified widespread system capacity issues in the study area for the 25-year, 24-hour and the 100-year, 24-hour design storms. Areas with the highest concentration of insufficient stormwater capacity are in the Madison District residential neighborhood, along S. Pine St. and at the intersection of Tacoma Mall Boulevard and S. Steele St. Individual surcharged pipes and overflowing manholes occur throughout the study area (City of Tacoma 2015b). Overcapacity stormwater pipes can result in localized flooding.

REGULATORY CONTEXT

The City's stormwater system is regulated as a Municipal Separate Storm Sewer System (MS4) under the City's Phase 1 National Pollutant Discharge Elimination System (NPDES) permit—(WAR044003). Under this set of regulations, the City maintains measures to protect and improve runoff conditions in relation to the receiving waters. Tacoma's stormwater management requirements and ongoing efforts are included in:

- Tacoma Municipal Code 12.08
- 2016 Stormwater Management Manual (hereafter the 2016 Manual; City of Tacoma, 2016a)

Stormwater Management Program Plan (City of Tacoma, 2016b)

The 2016 Manual became effective on January 7, 2016, and contains the stormwater mitigation requirements (referred to as the Minimum Requirements) for all new and redevelopment projects (specific requirements vary depending on watershed, and the type and size of the project). The Minimum Requirements are met through the use of Best Management Practices (BMPs) that prevent pollutants from entering stormwater, treat stormwater runoff, and divert and reduce the flow of runoff into the stormwater system. Some examples of stormwater best management practices include reducing impervious surfaces, maintaining vegetation, and managing stormwater through infiltration.

For any stormwater project proposing infiltration of treated stormwater, additional regulatory considerations are required to ensure protection of the aquifer resources (detailed under the Groundwater Conditions section). Groundwater Protection District regulations (TMC Chapter 13.09) control handling, storage and disposal of hazardous substances throughout the South Tacoma aquifer area. The City Stormwater Manual includes requirements for stormwater treatment where infiltration is proposed within this area, with standards developed consistent with the January 2011 Memorandum from the City Public Works Director and the TPCHD Division Director

WHAT ARE BEST MANAGEMENT PRACTICES?

Best Management Practices include activities, systems, prohibitions of practices, and maintenance procedures that are implemented to prevent or reduce water pollution, erosion and flooding.

for Environmental Health (*Implementation of Stormwater Infiltration for Pollution Generating Surfaces in the South Tacoma Groundwater Protection District*, January 21, 2011).

SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

City models show that current stormwater systems do not provide sufficient capacity to meet the stormwater LOS standard, under both existing and future developed conditions (City of Tacoma, 2015b). As future growth occurs, all new development and redevelopment would be required to make stormwater system improvements consistent with the adopted Stormwater Management Manual, including providing flow control and water quality BMPs as necessary.

No impacts are anticipated under either alternative related to known contaminated sites and potential contaminated sites in the study area. Investigation of conditions and potential clean-up would be required at potential contaminated sites (including the two known contaminated sites, and the five listed underground storage tank sites) prior to new development or redevelopment (Tacoma-Pierce County Health Department, 2015).

IMPACTS OF ALTERNATIVE 1 (NO ACTION)

Stormwater impacts under Alternative 1 would be consistent with those described as common to both alternatives. As sites redevelop, implementation of stormwater management best management practices required under the Stormwater Management Manual would continue to reduce adverse impacts that would otherwise occur under existing conditions.

As discussed in Chapter 3.1 Land Use, while the growth targets for Alternative 1 and Alternative 2 are similar, the likelihood of growth targets being reached varies between alternatives. Past and current development trends for the RGC are for much lower intensities than allowed under current zoning. The gap between allowed land use patterns and development trends creates uncertainty about the intensity of future development patterns under Alternative 1. In comparison, Alternative 2 includes proposals intended to encourage development, including updated development regulations and major improvements to multimodal transportation, stormwater and parks and open space systems. The City's Stormwater Management Manual requirements are triggered when new development occurs. Because there would potentially be less redevelopment under Alternative 1, there could be less implementation of stormwater

management BMPs under Alternative 1 than under Alternative 2. Additionally, existing zoning regulations under Alternative 1 effectively prohibit the type of area-wide stormwater strategy proposed under Alternative 2.

IMPACTS OF ALTERNATIVE 2

Under Alternative 2, the City would utilize an integrated approach for improving the study area stormwater infrastructure as part of the proposal. Draft Subarea Plan Goal E-1 calls for enhancing water quality and flow control conditions in the Tacoma Mall Neighborhood through implementation of an area-wide stormwater strategy including a variety of centralized and dispersed stormwater BMPs. Additional Plan goals and actions call for integrating stormwater infiltration and emergency overflow flood storage and conveyance into new parks and open spaces, and/or rights-of-way (Action E-2), prioritizing the construction of permeable pavement in the Madison District residentially zoned areas, as well as in other areas where land use and soil infiltration conditions are ideal (Action E-4) and preserving existing mature trees and green spaces when feasible.

The City currently encourages property owners to retrofit their properties and to make use of the Payment In-Lieu-of Construction Program and these practices are expected to continue under Alternative 1. By adding policy statements in support of these current practices, the proposed Subarea Plan emphasizes their importance.

Figure 2-9 shows the concept plan for the area-wide stormwater strategy provided in the Draft Subarea Plan. It includes a regional water quality and/or flood storage facility in the northwestern quadrant. It also includes permeable pavement for streets in areas with high soil permeability and with lower traffic volumes, including the Madison District and potentially the Lincoln Heights District. Corresponding permeable pavement projects for the Madison and Lincoln Heights Districts are included in the Draft Subarea Plan Transportation Chapter's list of priority transportation improvements.

The Phase 1 development regulations proposed under Alternative 2 include increased standards for street trees and landscaping. These standards would expand the amount of "green infrastructure" in the study area over time, contributing to the area-wide stormwater strategy.

The area-wide stormwater strategy would benefit from a coordinated implementation approach by taking advantage of economies of scale. Alternative 2 provides the City with direction to implement this approach, expanding the use of the most

effective strategies for City infrastructure projects and retrofit of existing development.

MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action

- Under Alternative 2, successful implementation of goals and actions in the Draft Subarea Plan described above would likely have positive impacts on stormwater service in the study area. Proposed development in the subarea would be reviewed for consistency with the Subarea Plan, as well as any associated regulatory requirements.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

- Under Alternative 2, proposed Phase 1 code amendments to implement the Subarea Plan include new design standards including increased requirements for tree plantings and landscaping, which would support stormwater management.
- Under both alternatives, Tacoma's stormwater management requirements and ongoing efforts would support stormwater service. These are described in:
 - o Tacoma Municipal Code 12.08
 - o 2016 Stormwater Management Manual (City of Tacoma, 2016a)
 - o Stormwater Management Program Plan (City of Tacoma, 2016b)
- Under both alternatives, update the requirements for the South Tacoma Groundwater Protection District included in Tacoma Municipal Code 13.09 and Tacoma-Pierce County Health Department guidelines to maintain consistency with agreed upon South Tacoma Groundwater Protection District guidelines and other stormwater management requirements.

OTHER MITIGATION MEASURES

Any other mitigation not contained in the categories above:

- None.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts are anticipated related to stormwater infrastructure, flow quantities, or quality within the Tacoma Mall Neighborhood study area.

3.8.5 ELECTRICITY

EXISTING CONDITIONS

Tacoma Power, one of three business units that make up TPU, serves a 180-square mile area that includes the City of Tacoma and surrounding areas. Tacoma Power acquires its electricity from a diverse mix of resources of which over 90% is hydroelectric power, including the utility's seven hydroelectric dams, contract purchases from Bonneville Power Administration, and regional hydroelectric resources owned by others. Additional power supplies are procured from the wholesale energy market on an as needed basis. Tacoma Power's transmission system is interconnected with the regional transmission network and includes high-voltage 230 kilovolt (kV) facilities and high-voltage 115 kV facilities.

Within the study area, Tacoma Power owns, operates, and maintains 12,470 volt overhead and underground distribution facilities to serve its customers. Tacoma Power's Cedar Substation, with a total capacity of 50MW, is located in the northwest portion of the study area and serves the majority of the study area. Two additional substations, located outside the study area, provide additional load support to the study area. According to Tacoma Power staff, the study area's existing facilities have no deficiencies, and significant capacity upgrades are not planned for the foreseeable future (J. Rempe, 2016).

The adopted LOS standard for electric utilities specifies a voltage level and an average annual system outage duration of 75 minutes or less (City of Tacoma, 2014b). As development within the study area increases, Tacoma Power will make improvements as necessary to serve the additional electrical load. Tacoma Power recognizes that new technologies will impact future electrical needs; frequently new technologies (energy efficient appliances and fixtures, modern electric heating and/or cooling along with improved building heat efficiency) will improve energy efficiency and reduce consumption by individual customers even as overall residential and jobs populations increase within the study area.

In all cases, system improvements required to serve specific development projects will be funded by the developer. Concurrency requirements necessitate that these improvements are available to serve the population at the same time or within a reasonable amount of time without decreasing current service levels below locally established minimum standards (City of Tacoma Comprehensive Plan—Utilities Element).

SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

Future population growth and development will increase demand for electrical energy in the study area. Due to similarities in anticipated growth under both alternatives, corresponding increases in electricity demand would be similar.

It is not anticipated that growth associated with the No Action or Action Alternative would place significant pressure on the existing electrical system or result in not meeting the LOS standard for residents or businesses within the study area. Tacoma Power would continue its practice of upgrading the electrical system, commensurate with anticipated growth in the study area and throughout their service area, in order to ensure adequate electrical services are provided. The rate structure would reflect the cost of adding new service and additional resources and infrastructure, as warranted. The City and Tacoma Power would continue to pursue energy efficiency measures to reduce energy consumption, thereby reducing stress on the utility as residential and jobs growth occurs.

IMPACTS OF ALTERNATIVE 1 (NO ACTION)

No impacts other than those described under Impacts Common to All Alternatives.

IMPACTS OF ALTERNATIVE 2

The Draft Subarea Plan includes policy guidance to support provision of public services in the study area. Goal US-1 calls for ensuring that utilities are available at an appropriate LOS to support the neighborhood's existing and planned development. This is consistent with current City practices. Additionally, Action US-2 calls for requiring existing and new distribution lines to be placed underground at the time of new development, when feasible. Successful implementation of this policy guidance is anticipated to have positive impacts on electric service as the Draft Subarea Plan is implemented over time.

MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action

- Under Alternative 2, successful implementation of Goal US-1 and Action US-2 is expected to support adequate provision of electric services in the study area and encourage undergrounding of electrical infrastructure. Proposed development in the subarea would be reviewed

for consistency with this and other policy guidance in the Subarea Plan, as well as any associated regulatory requirements.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

- Under both alternatives, TPU will continue investments in conservation to lower overall energy usage. Conservation is an integral component in TPU's resource strategy, and as a result has contributed to reported annual load reductions as high as 35 MW (City of Tacoma, 2015a).

OTHER MITIGATION

Any other mitigation not contained in the categories above

- None.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts are anticipated related to the projected growth in demand for electrical service within the Tacoma Mall Neighborhood study area.

3.8.6 NATURAL GAS

EXISTING CONDITIONS

To provide the City of Tacoma and adjacent communities with natural gas, Puget Sound Energy (PSE) builds, operates, and maintains a system consisting of transmission and distribution natural gas mains, odorizing stations, pressure regulation stations, heaters, corrosion protection systems, above ground appurtenances and metering systems. Transmission and distribution mains are located along public rights-of-way throughout the city (City of Tacoma, 2015a).

PSE natural gas lines provide utility service throughout the study area (Bates, 2015). In addition, the PSE Tacoma Field Office is located within the study area at 3130 S. 38th St.

Tacoma does not have an adopted LOS standard for natural gas provision. The existing natural gas system within the study area provides adequate service for existing natural gas utility users, however, and has capacity to accommodate anticipated future uses and development (J. Payne, 2016).

SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

Due to similarities in anticipated growth under both alternatives, corresponding increases in natural gas demand would be similar.

Both alternatives propose continued growth and development, with slightly more growth and development anticipated under the Action Alternative. Additional development will increase the overall demand for natural gas within the study area; however, per capita demand is anticipated to remain relatively constant, and adequate infrastructure and supply exist to expand service provision.

IMPACTS OF ALTERNATIVE 1 (NO ACTION)

No impacts other than those described under Impacts Common to All Alternatives.

IMPACTS OF ALTERNATIVE 2

The Draft Subarea Plan includes policy guidance to support provision of public services in the study area. Goal US-1 calls for ensuring that utilities are available at an appropriate LOS to support the neighborhood's existing and planned development. This is consistent with current City practices. Successful implementation of this goal is anticipated to have positive impacts on natural gas service as the Draft Subarea Plan is implemented over time.

MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action

- Under Alternative 2, successful implementation of Goal US-1 is expected to help ensure adequate provision of natural gas service in the study area. Proposed development in the subarea would be reviewed for consistency with this goal and other policy guidance in the Subarea Plan, as well as any associated regulatory requirements.

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

- Under both alternatives PSE would continue its practice of modifying its natural gas delivery system every year to address existing and new customer growth, load

changes that require system reinforcement, rights-of-way improvements, and pipeline integrity issues. In addition, PSE continuously adds and modifies infrastructure to meet gas volume and pressure demands (City of Tacoma, 2015a).

- Under both alternatives, PSE would continue to maintain its Integrated Resource Plan (IRP), which is updated every two years. The IRP identifies methods to provide dependable and cost effective natural gas service that addresses customer demands. During the summer months, when wholesale gas prices and customer demand are low, PSE buys and stores significant amounts of natural gas in large underground facilities. The gas is then withdrawn in winter when customer usage is highest, ensuring a reliable supply is available (City of Tacoma, 2015a).

OTHER MITIGATION

Any other mitigation not contained in the categories above

- None

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts are anticipated related to the projected growth in demand for natural gas service within the Tacoma Mall Neighborhood study area.

3.8.7 SOLID WASTE

EXISTING CONDITIONS

City of Tacoma's Environmental Services Department provides solid waste collection service for residential, commercial and industrial customers within city limits. Tacoma owns and operates its own fleet of collection vehicles, and every-other-week garbage collection service is mandatory for all residents. Recycling and yard waste collection is an optional biweekly service available at no additional cost to residential customers. The City operates the Tacoma Landfill as a base of operations, transfer station, and material recovery facility, but it closed for waste disposal in 2012. The City, under a 20-year contract with Pierce County that was established in 2000, delivers all items that cannot be processed, nonrecyclable materials, and waste to the 304th St. Landfill located in Pierce County (City of Tacoma, 2015a).

Solid waste services are provided to the customers in the study area similar to the rest of the city. The LOS standard is set at 1.13 tons per capita per year. Under current city-wide population projections, capacity for approximately 39,563 additional tons of solid waste will be available through 2020, including nonrecyclable, noncompostable material, compostables, and recyclables (Table 3.8-3; City of Tacoma, 2014b). Based on the

1.13 tons per capita per year LOS standard, this equates to a reserve capacity that could serve 35,011 additional residents through 2020.

Table 3.8.2. Solid Waste Capacity through 2020

2020 Projected Population	Solid Waste LOS Standard	2020 Capacity	2020 Citywide Demand, Anticipated	2020 Reserve Capacity
203,926	1.13 tons / capita / year	270,000 tons	230,437 tons	39,563

Source: City of Tacoma, 2014b

The City of Tacoma has planned for solid waste services through 2020. Under existing conditions, current landfill capacity is expected to be sufficient until at least 2020 (City of Tacoma, 2015a). Before the City’s contract with Pierce County expires in 2020, the City will have the option to extend or renegotiate the contract, or to put out a bid for alternative landfill services. The City does not anticipate constructing a new landfill in the future. The City is currently working to develop a waste management plan with a planning horizon out to 2040 and is studying ways to divert waste from the landfill, which may help to reduce the rate of increasing demand for solid waste service. Upgrades and maintenance to the landfill are anticipated to occur through 2020, with utility participation funding the upgrades and maintenance (City of Tacoma, 2015a).

SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

Due to similarities in anticipated growth under both alternatives, corresponding increases in solid waste utility demand would be similar.

Solid waste utility needs will grow under both alternatives, and the additional population growth associated with the Action Alternative will result in additional corresponding demand. However, ample capacity exists at the City’s landfill to absorb increased waste as a result of more people living and working in the study area. The City’s capacity to absorb solid waste generated by an additional 35,011 residents (city-wide) through 2020 exceeds projected growth in the study area and throughout Tacoma in the next four years. It is anticipated that capacity will continue to exceed projected growth and solid waste utility demand through 2040 for both the No Action and Action Alternatives. The City will need to maintain and replace fleet vehicles and other resources used to administer solid waste collection, as necessary. This includes ensuring that curb-side

pickup policies and procedures are in place to meet growing demand from an increased density of commercial and residential customers, and that customer education and enforcement programs are supported.

IMPACTS OF ALTERNATIVE 1 (No Action)

No impacts other than those described under Impacts Common to All Alternatives.

IMPACTS OF ALTERNATIVE 2

The Draft Subarea Plan Goal US-2 provides policy direction to minimize impacts on adjacent properties and open spaces associated with the siting, development and operation of utility services and facilities as future development and redevelopment occurs. Associated Action US-5 specifically addresses the need to update development regulations to ensure that adequate and consolidated space is provided for solid waste containers, especially for higher-density residential uses anticipated for previously detached single-family areas (new two-family, three-family and townhouse developments). Development standards in the Phase 1 Code Amendments proposed under Alternative 2 would help to implement this policy guidance.

Also, the Draft Subarea Plan includes policy guidance to support provision of public services in the study area. Goal US-1 calls for ensuring that utilities are available at an appropriate LOS to support the neighborhood's existing and planned development. This is consistent with current City practices. Successful implementation of this goal is anticipated to have positive impacts on solid waste service as the Draft Subarea Plan is implemented over time.

MITIGATING MEASURES

INCORPORATED PLAN FEATURES

- Under Alternative 2, successful implementation of Goal US-1, Goal US-2 and associated actions is expected to help ensure adequate provision of solid waste service in the study area and to address needs for minimizing impacts of solid waste service on adjacent properties. Proposed development in the subarea would be reviewed for consistency with this and other policy guidance in the Subarea Plan, as well as any associated regulatory requirements.

REGULATIONS AND COMMITMENTS

- Under Alternative 2, proposed development standards in the Phase 1 code amendment package would mitigate

impacts of solid waste service on adjacent properties, helping to implement related policy guidance in the Draft Subarea Plan.

OTHER MITIGATION

- Under both alternatives, the Environmental Services Department should review policies and programs that direct solid waste collection practices, as well as enforcement for solid waste customers. As future development within the study area and throughout the City increases demand, the Environmental Services Department must ensure that adequate curbside service is provided and container set-out guidelines are enforced. Customer education should be supported so as to reduce overall waste generation, divert garbage waste to optional recyclable and yard waste collection services, and maximize compliance with solid waste set-out guidelines.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts are anticipated related to the projected growth in solid waste service needs within the Tacoma Mall Neighborhood study area.

3.8.8 TELECOMMUNICATIONS

EXISTING CONDITIONS

Telecommunications utilities in the city are provided by private companies and by TPU's Click! service. The majority of Tacoma is served by private telecommunication providers. Their infrastructure is located throughout the city and includes lines, poles, cables, antenna, towers and system hubs. TPU's Click! Service is a fiber network used by Tacoma Power to transmit data from substations and other data gathering devices to a central Energy Control Center for load monitoring and management. The network includes one of the largest two-way smart meter pilot projects in the country. Click! is also offered to the public as a service for cable television, high-speed data transport and internet access (City of Tacoma, 2015a).

Telecommunication utilities in the study area are not subject to adopted LOS standards or concurrency. The available telecommunications utilities expand infrastructure and service as needed to support additional customers, and the capacity and condition of existing infrastructure is currently adequate (City of Tacoma, 2015a). Telecommunications infrastructure is generally co-located with TPU power facilities along public rights-of-way (City of Tacoma, 2015a).

SIGNIFICANT IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

Due to similarities in anticipated growth under both alternatives, corresponding increases in telecommunications services demands would be similar for both Alternative 1 and Alternative 2.

Additional development will increase the demand for telecommunications services. However, it is anticipated that this demand can be met by existing telecommunications infrastructure and demand-driven improvements without impacts to capacity or service. As new customers enter into the system, service and infrastructure will be expanded to meet the new demand. The cost of system upgrades would be shared amongst rate-payers.

IMPACTS OF ALTERNATIVE 1 (NO ACTION)

No impacts other than those described under Impacts Common to All Alternatives.

IMPACTS OF ALTERNATIVE 2

The Draft Subarea Plan includes policy guidance to support provision of public services in the study area. Goal US-1 calls for ensuring that utilities are available at an appropriate LOS to support the neighborhood's existing and planned development. This is consistent with current City practices. Successful implementation of this goal is anticipated to have positive impacts on telecommunication service as the Draft Subarea Plan is implemented over time.

MITIGATING MEASURES

INCORPORATED PLAN FEATURES

Mitigation contained in plans and policies adopted or planned for adoption as part of the proposed action

- Under Alternative 2, successful implementation of Goal US-1 is expected to help ensure adequate provision of telecommunication service in the study area. Proposed development in the subarea would be reviewed for consistency with this goal and other policy guidance in the Subarea Plan, as well as any associated regulatory requirements.
- Under both alternatives, consistent with Comprehensive Plan policy, the City will work with service providers to maintain existing infrastructure and invest in expanded or new infrastructure to support planned growth and the

development patterns called for in the Comprehensive Plan's Land Use Element (City of Tacoma, 2015a).

REGULATIONS AND COMMITMENTS

Mitigation contained in regulations or other requirements adopted or planned for adoption as part of the proposed action

- None

OTHER MITIGATION

Any other mitigation not contained in the categories above

- None

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts are anticipated related to the projected growth in telecommunications needs within the Tacoma Mall Neighborhood study area.

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Existing: Water Mains
February 2017

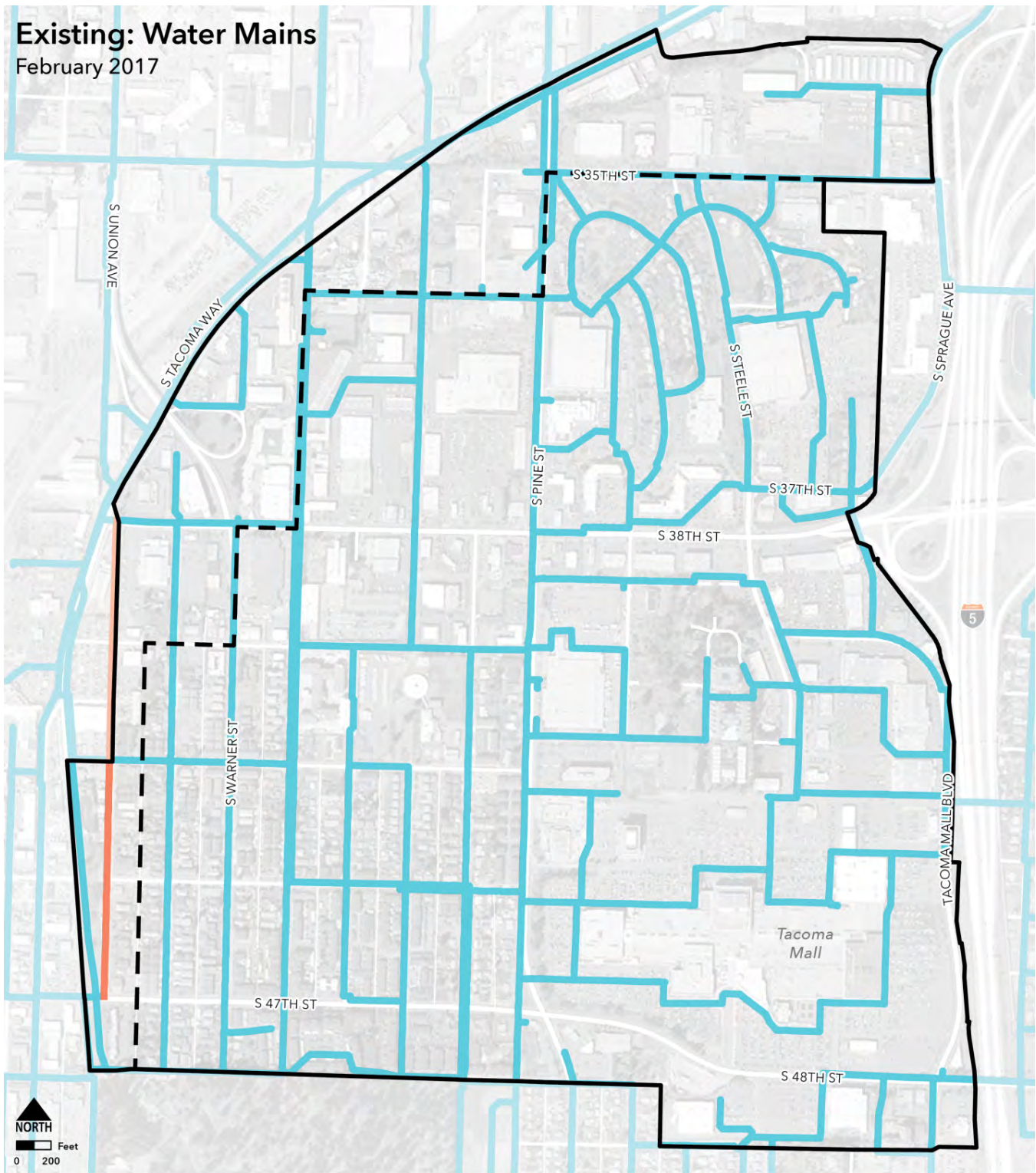


Figure 3.8.1. Existing Water Mains

Source: City of Tacoma, 2016; ESA, 2016; 3 Square Blocks, 2016.

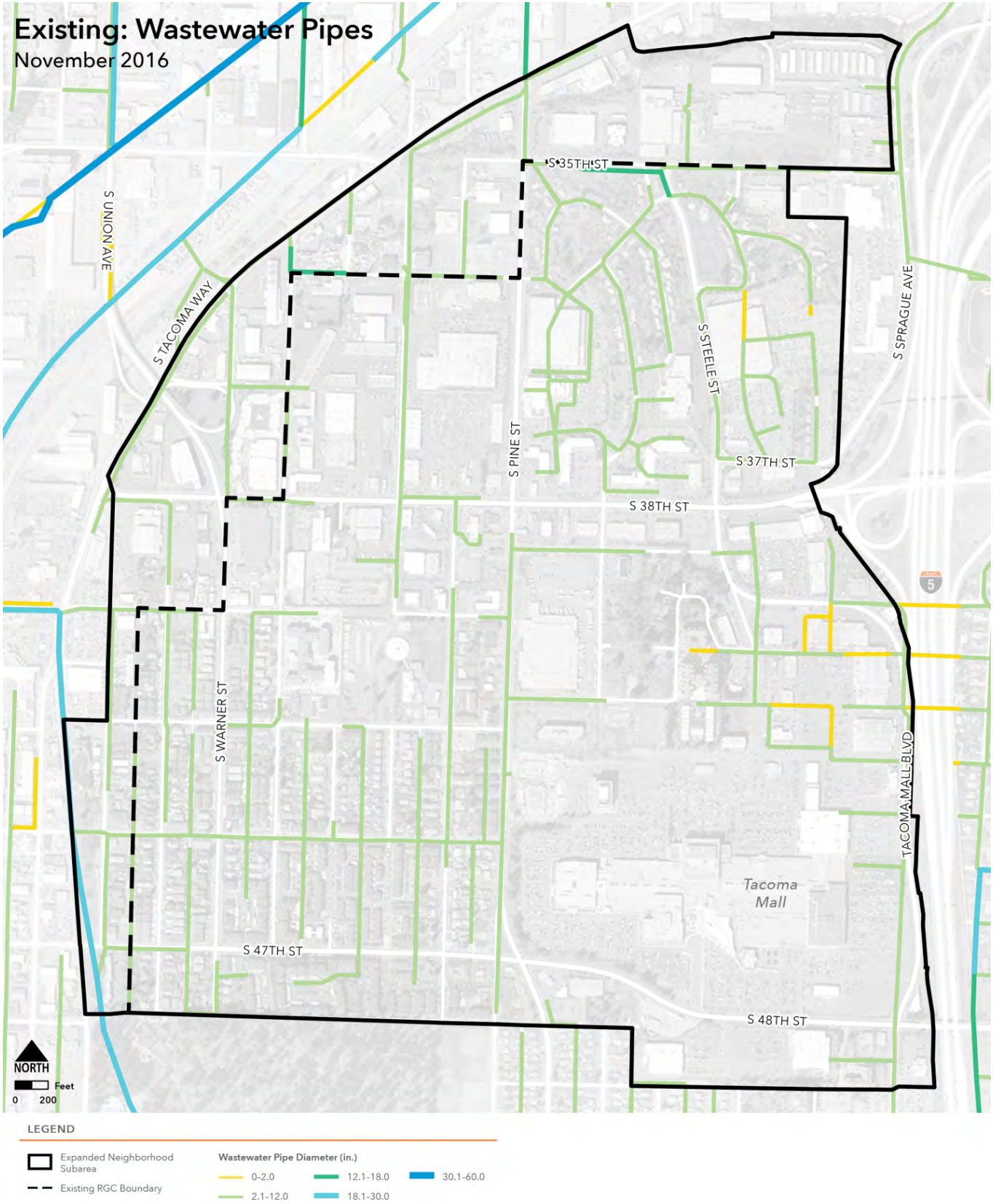
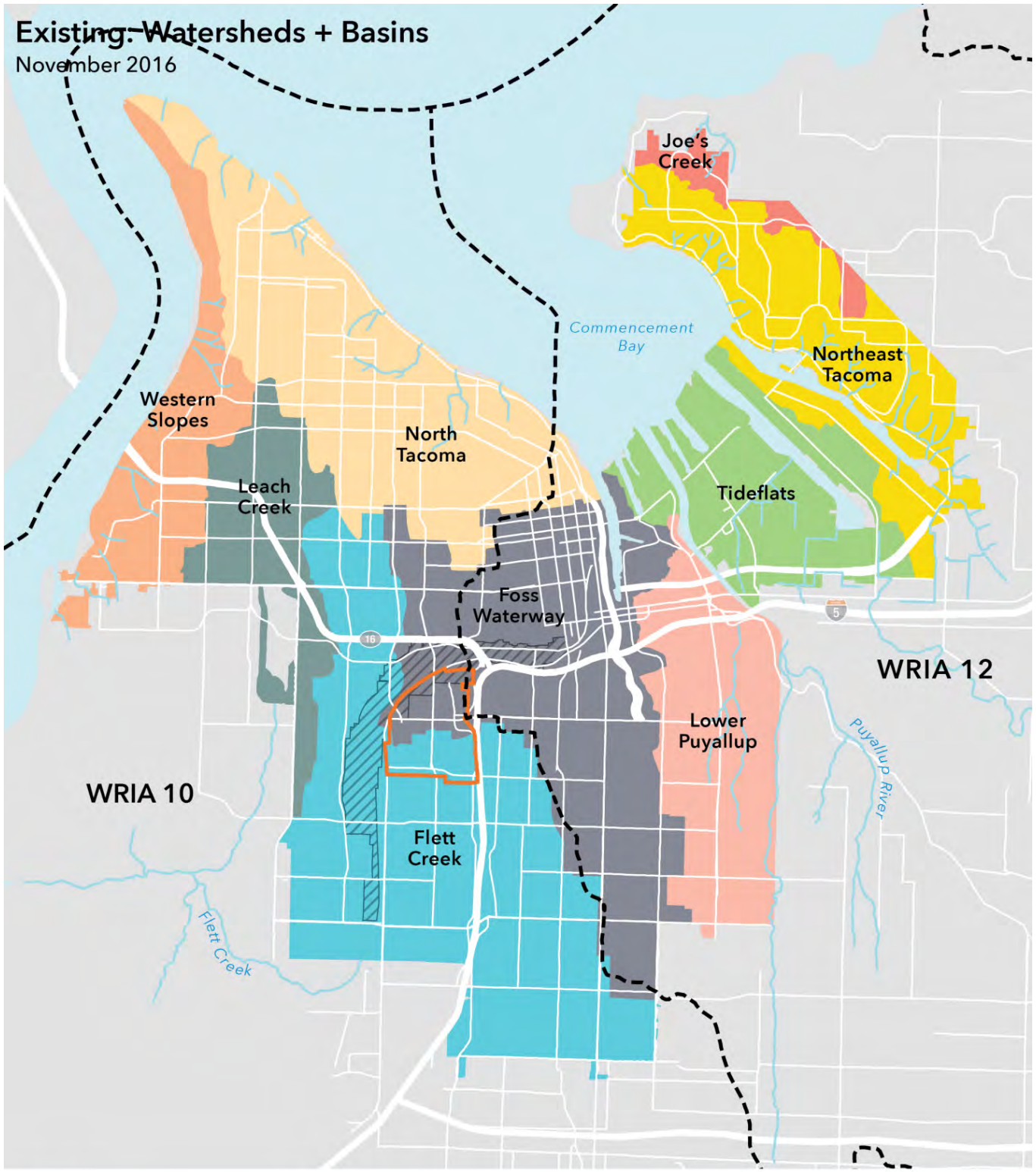


Figure 3.8.2. Existing Wastewater Pipes

Source: City of Tacoma, 2016; ESA, 2016; 3 Square Blocks, 2016.



Existing Watersheds + Basins
November 2016

LEGEND

- | | | | |
|-------------------------------|-------------------|----------------|------------------|
| Expanded Neighborhood Subarea | Stormwater Basins | Leach Creek | Northeast Tacoma |
| South Tacoma MIC | Flett Creek | Lower Puyallup | Tideflats |
| Water Resource Inventory Area | Foss Waterway | North Tacoma | Western Slopes |
| | Joe's Creek | | |

Figure 3.8.3. Existing Watersheds and Basins

Source: City of Tacoma, 2016; ESA, 2016; 3 Square Blocks, 2016.

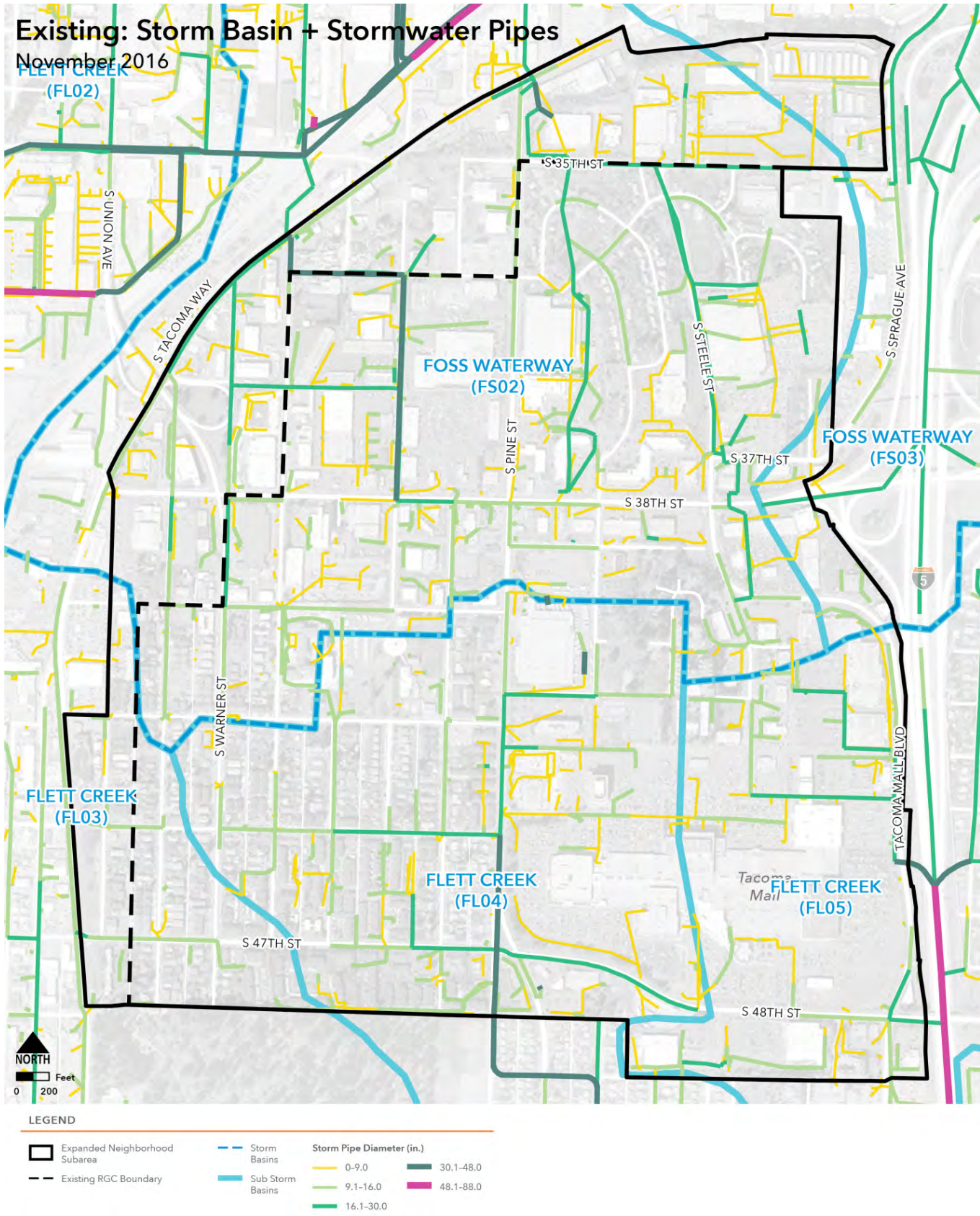
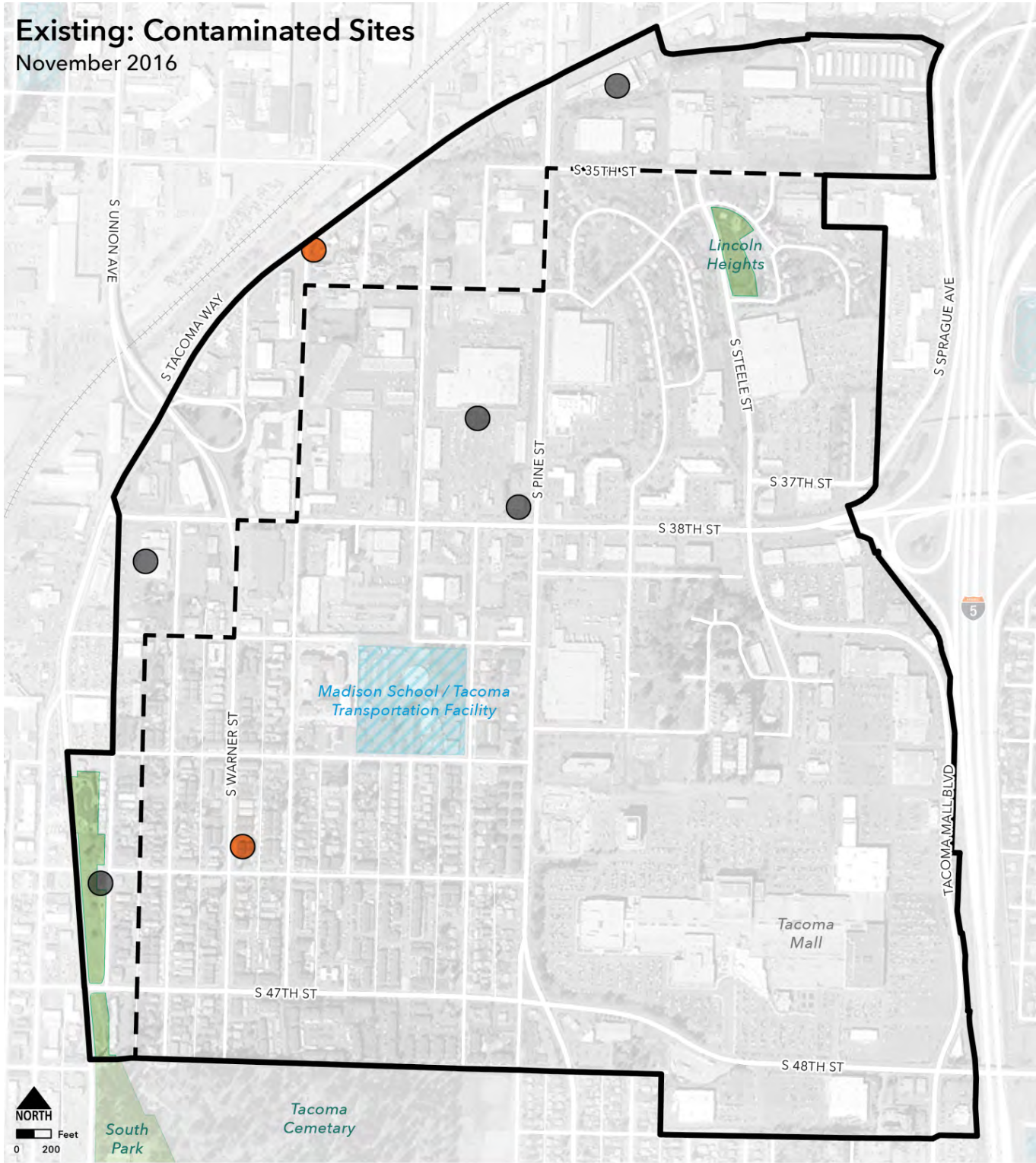


Figure 3.8.4. Existing Storm Basin and Stormwater Pipes

Source: City of Tacoma, 2016; ESA, 2016; 3 Square Blocks, 2016.

Existing: Contaminated Sites

November 2016



LEGEND

Expanded Neighborhood Subarea	Parks + Open Space	Contaminated Sites
Existing RGC Boundary	Schools (Public)	Contaminated Sites
South Tacoma MIC		Abandoned Commercial Tanks

Figure 3.8.5. Existing Contaminated Sites and Potential Sites for Abandoned Storage Tanks

Source: City of Tacoma, 2016; ESA, 2016; 3 Square Blocks, 2016.

COMMENTS AND RESPONSES

4.1 PUBLIC COMMENTS PROCESS SUMMARY

The City conducted a public notification, review and decision process for the public review draft of the Tacoma Mall Neighborhood Subarea Plan and the associated Draft Environmental Impact Statement (EIS). The intent was to produce a well-supported, in-depth public discussion informed by a comprehensive understanding of the likely impacts and mitigation actions of both alternatives. Staff conducted extensive outreach efforts to ensure early and continuous public participation in the subarea planning process. The outreach efforts included providing project updates and overviews of the Subarea Plan and EIS to the South Tacoma Neighborhood Council, interested parties, regular meetings with a community stakeholder group, periodic community meetings, open houses, and business group outreach. Throughout the process participants were encouraged to voice concerns, provide suggestions, and to discuss particular issues. The overall public engagement process is summarized in Chapter 2.3 (page 10).

Notice of Availability—The City issued a Notice of Availability of the issuance of the Draft Subarea Plan, Draft EIS and subsequent Public Hearing, was mailed on August 11, 2017, to:

- Property owners, renters of record and licensed businesses within the Subarea and within or within 1,000 feet of the boundaries of the Subarea;
- Agencies with jurisdiction over future development within the Subarea;
- The Tacoma Public Library;
- Neighborhood Councils, qualified neighborhood community organizations, and business districts;
- Email notice was sent to the Planning Commission notification list, community groups, stakeholders, and other interested parties;

- A notice was published in the Daily Index and The News Tribune.

Public Notice Signs—Public notice signs were installed throughout the Subarea prior to the September 6, 2017 Planning Commission Public Hearing.

60-Day Notices—A “Notice of Intent to Adopt Amendment 60 Days Prior to Adoption” was sent to the State Department of Commerce on August 11, 2017 (per RCW 36.70A.106) and to the Puget Sound Regional Council (per the Plan Review Requirements and Process in VISION 2040).

Website—The public hearing notice and all information associated with the Tacoma Mall Neighborhood Subarea Plan and EIS were posted on a project website at www.tacomamallneighborhood.com and summary information was also posted on the Planning and Development Services’ website at www.cityoftacoma.org/planning “click on Tacoma Mall Neighborhood Subarea Plan and EIS”.

Public Hearing and Comment Period—The Planning Commission conducted a public hearing on September 6, 2017, at the Asia Pacific Cultural Center during the public comment period, regarding the Draft Tacoma Mall Neighborhood Subarea Plan, and kept the record open through September 15, 2017 to receive additional written comments. Fourteen people provided oral testimony at the public hearing and 38 written comments were received during the comment period.

4.2 CHANGES SUBSEQUENT TO THE PUBLIC REVIEW DRAFT

The following changes were made to the public review draft of the Tacoma Mall Neighborhood Subarea Plan subsequent to the close of the comment period. The Planning Commission discussed the public input at their September 20, 2017 and October 18, 2017 meetings. On October 18, 2017 the Commission provided final direction on changes to address the issues raised, and forwarded their recommendation to the City Council to adopt the Tacoma Mall Neighborhood Subarea Plan and associated regulatory changes. The draft Subarea Plan and the Final EIS have been updated to reflect the Commission’s final direction.

The comments have been generally organized by topic according to the chapter structure of the Tacoma Mall Neighborhood Subarea Plan. All comments received are included in Section 4.3.

Key Comments

Changes to the Draft Subarea Plan

GENERAL COMMENTS

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|---|--|
| 1. Clarify the intent of the proposals | The Commission directed several minor changes to clarify the intent of the proposals. |
| 2. A plan for thoughtful growth is needed, however it must be appropriate to market realities | Substantial attention has been paid to modifying the proposals to ensure that they promote significant growth and change over time without placing undue burdens on existing businesses and property owners. Specifically, the Commission made changes to the proposed Connectivity Requirement and to the Pedestrian and Bicycle Access Standards to address this issue. These changes are described below. |

LAND USE CHAPTER

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| 1. Clarify relationship between the Subarea, Downtown, and the South Tacoma Manufacturing/Industrial Center | The Commission directed text and map changes be made to illustrate the relationship between the Downtown Tacoma RGC as the highest planned concentration of growth and density, and the Tacoma Mall Neighborhood Subarea, the second highest but substantially lower density area of the City of Tacoma. |
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HOUSING CHAPTER

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| 1. Proposed affordable housing targets are too low | The Commission modified the affordable housing targets for the Tacoma Mall Neighborhood from 25% of affordable housing affordable to households earning 80% of Pierce County Median Income, to 50% of households affordable at that income level. |
| 2. Concerns about involuntary displacement of low income households | The Commission added an action calling for a near-term study to identify strategies that will be effective in preventing involuntary displacement of low income households. |

TRANSPORTATION CHOICES CHAPTER

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| 1. Proposed Bicycle and Pedestrian Network | <p>The Commission made three modifications to the proposed Bicycle and Pedestrian Network map (Subarea Plan, Figure T-11):</p> <ul style="list-style-type: none">• Modified the proposed Wright Ave Bike Boulevard to indicate desired connection points, rather than a specific alignment.• Added connections from the Loop Road to South Tacoma Way and S. 35th Street• Modified the proposed S. 40th Street Bike Connection to follow S. 40th Street to Union Ave., then Union Ave. to S. 38th Street |
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Key Comments

Changes to the Draft Subarea Plan

<p>2. Proposed Transportation Project list and maps</p>	<p>The Commission modified the proposed Transportation Projects ranking list and maps (Subarea Plan, Table T-2 and Figures T-12, T-13 and T-14) as follows:</p> <ul style="list-style-type: none">• Area-wide Sidewalk Gaps was moved from the Mid-term Priorities section to the Near-term Priorities section• S. 35th Street Bike Corridor was moved from the Long-Term Priorities section to the Mid-Term Priorities section• Map changed to reflect the revised alignment of the S. 40th Street Bike Connection
<p>3. Proposed Connectivity Plans</p> <ul style="list-style-type: none">• The proposal would be an excessive burden, take private property rights, and stifle development• Proposed process is onerous and complex• Thresholds proposed are too low• Opposition to proposed S. 37th Street and S. Wright Avenue• The City should pay for S. 37th Street if it is needed, and extend it eastward to Fife St.• Connectivity should be planned at the time of major redevelopment, not before• Sites with restricted access should be exempt	<p>The Commission modified the proposed Connectivity Plan requirement in recognition of the public and property owners concerns, as follows:</p> <ul style="list-style-type: none">• Restructured the review process from a “Connectivity Plan” requirement to a “Site Approval” review process, integrated with existing Tacoma Municipal Code review and appeal processes and including a discretionary City review of transportation impacts (see Land Use Appendices LU-1 and LU-2)• Modified the proposed Priority New Connections Tiers Map to depict Tier 2 connections points, rather than proscribed alignments; and, to extend proposed S 37th Street eastward to S. Steele Street (see Subarea Plan, Figure T-9)• Updated the Transportation Choices Chapter to reflect the revised “Site Approval” approach (see Subarea Plan, pages T-13 to T-15)• Increased review thresholds for the Site Approval requirement to be consistent with existing SEPA review thresholds (see Appendices LU-1 and LU-2)• Required Transportation Impact Assessments for all Subarea Plan projects which exceed SEPA review thresholds (see Appendices LU-1 and LU-2)

Key Comments

Changes to the Draft Subarea Plan

- | | |
|---|---|
| <p>4. Pedestrian access standards</p> <ul style="list-style-type: none">• Frequency and size of required connections too high and would divide up properties• Threshold should remain 50% not 15% of the valuation of improvements, tenant improvements should be exempt• Sites with restricted access should be exempt | <p>The Commission modified the proposed revisions to the existing TMC 13.06.512 Pedestrian and bicycle support standards, as follows (see Appendices LU-1 and LU-2):</p> <ul style="list-style-type: none">• Clarified the code applicability to various site sizes• Reduced the requirement for alterations less than 50% of valuation to only providing a path to the sidewalk• Provided exemptions and exceptions for certain land uses that are less pedestrian-oriented• Allowed site access to be restricted when necessary for public safety or operational reasons• Reduced the width of proposed through-connections |
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ENVIRONMENT CHAPTER

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| <p>1. Place more emphasis on the importance of protecting the South Tacoma Aquifer</p> | <p>The Commission directed text modifications to highlight the benefits of proposed green stormwater actions to protect and recharge the South Tacoma Aquifer (see Subarea Plan Introduction and Environment Chapters)</p> |
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COMMUNITY VITALITY CHAPTER

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| <p>1. Clarify what it means to show a proposed park on a map</p> | <p>The Commission directed text modifications to clarify that the proposed Conceptual parks and open space plan is not intended to be regulatory or binding (see Subarea Plan Figure CV-2)</p> |
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SHARED PROSPERITY CHAPTER

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| <p>1. Avoid an over-concentration of improvements in the Lincoln Heights (NE) and Mall (SE) Districts, consider designating several under-utilized parcels in the Northwest District as catalyst sites</p> | <p>The Commission directed text and map changes to designate an approximately four-block area between Pine and Lawrence Streets, and S. 35th and S. 36th Streets as a Catalyst Site (see Subarea Plan, Figure SP-1).</p> |
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IMPLEMENTATION CHAPTER

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| <p>1. Make sure that infrastructure is keeping pace with development</p> | <p>The Commission directed a new action be added calling for tracking the completion of transportation projects and other implementation actions to ensure they are occurring at a pace consistent with the pace of growth (see Subarea Plan, new Action IMPL-5).</p> |
|--|---|

4.3 PUBLIC COMMENTS

From: joriadkins@mac.com
To: [Tacoma Mall Neighborhood Subarea Plan project](#)
Subject: Tacoma Mall Neighborhood Subarea Plan comments
Date: Thursday, September 07, 2017 2:59:59 PM

I listened to the comments at last night's public meeting and would like to offer these questions and observations

- The introduction 1st paragraph after the Vision refers to the proximity to Downtown (Fig. I.1) Downtown will be on the final map?

This is very important even more so than the TideFlats or even the S. Tac M/IC as this is what the people of this area are relating to, as far as planning for growth in their area. It is stated several times in this Intro that the Mall Subarea is second to Downtown in expected job and density growth.

If the M/IC is going to be shown here, it should state why that is important to the Subarea and I don't see that, did I miss it? That it is an Overlay w/additional protection for M/I uses by further restricting incompatible uses.... Is there enough buffer along S. Tac Way and Water flume Trail?

The fear of higher density and heights might be (somewhat) alleviated by better stating this relationship to Downtown, by showing Downtown as being the MUCH denser RGC with heights of 100+ ft. compared with the proposed 45' - 65' for the Mall area.

Also I think there should have been, and can be in this document, better/stronger education of what the Vision and Goals mean in the long run. Try to get it across that they are not to be achieved in the short term and maybe not even in the long term, but IDEALY they are what directs the process *toward* the Goals and the progress of getting there. It sounded, last night, like people were afraid of having their land taken, where, I believe, you are trying to get a buy-in on an ideal of a new way of looking at retail/commercial/mixed use development. It seemed to me that there was a soft buy-in on the ideas at the meeting. Retail/commercial endeavors are not really working to their expectations and most people are hearing of new ideas on creating a village feeling (read; pedestrian) to the areas around and in their developments. I do hope there have been meetings with these people and education through outside resources (LUI, trade magazines, new urbanism etc). They will do better, but betterment costs money.

- Be up front on whether Strategies are a *shall* or a *should*.

In the Actions where it is suggested to "Revise development regulations to require..." and "Revise the TMC to state....", will they be done automatically when the Plan is adopted by the Council or will the neighborhood have to raise the issue again and shepherd it through the process?

We missed some action items when we did the South Downtown Subarea Plan and now we need to go back and resurrect those initiatives ourselves.

- I am very concerned about Implementation. It is so important to make sure, if the City is going to start up these planning processes in a neighborhood, that they follow up with some of the Catalyst Projects quickly. They should be the ones that are NOT contentious, of course, but start concrete design meetings on some that all agree on (move forward with the 3 key Corridors- the new I-5 ramp, 38th and the 45th to Fife Transit connection IF those are the ones most people want). The City needs to take the lead in this. Take care of your volunteers who

have come to these meetings.

Whatever did happen to the 2 bond issues for fixing roads? Was any of this money spent in this area?

- Transit needs to pull up into the Mall area to drop people off, not have them walk across a busy street then across a sea of parking. Do not treat bus riders as second class citizens, they are the ones who should be given optimum drop off spots!

Thank you to the all volunteer Planning Commission and City staff for your work on this

Sincerely, Jori Adkins
301 Puyallup Ave.
Tacoma WA 98421

423 141st Street So
Tacoma, WA 98444
September 14, 2017

Chair Stephen Wamback
Tacoma Planning Commission
747 Market Street
Tacoma, WA 98402

Dear Mr. Wamback:

I am writing as a member of Tacoma Friends Meeting (Quakers). Our meetinghouse is located at 2508 South 39th Street and is a commercially-zoned property within the Tacoma Mall Subarea. We are one of the few religious organizations within this subarea community. Although I am the clerk of the meeting (equivalent to a chairperson) I am writing as an individual member of the meeting not as the clerk, because I have not been authorized to represent the opinions of the meeting as a group. Part of our property includes the park that was established many years ago by Hillside Community Church and the Tahoma Audubon Society.

My concern here is with several issues that have arisen as a result of the residential plans and zoning rules proposed in the subarea plan. I have also agreed to be a co-signer of the letter you will receive from John and Eleanor Brekke that addresses elements of the plan that affect the commercial property owners.

The issues I see and my opinions about the residential plans are as follows:

1. **No front doors of apartment complexes should face alleys.** This creates second-class residents of those buildings. Having one's front door face an alley is demeaning to the residents and not conducive to pride of place or care of one's place. Although it is promised that developers will have to provide street-like amenities or mews-like designs for the alleys, I do not believe these rules will be enforced.
2. **Six-story buildings seem to me to be too high for apartment buildings, if we want to promote a more attractive and safer neighborhood.** I recognize that height will give the developers more profit for their investments. However, in my travels in the US and Europe, it has seemed to me that four-story apartment buildings offer a sense of neighborhood better than taller structures. They are not so overwhelming in size.
3. **Townhouses are not suitable for many senior citizens and generally not at all for disabled people**—obviously because of the need in each home to negotiate at least two flights of stairs to use the residence.
4. **Parks should be developed in available greenspace.** I am aware that these as yet undeveloped lots are privately owned. I hope Metro Parks can be encouraged to take an interest in this subarea.
5. **The various environmentally sensitive programs for porous streets, tree canopy enhancement, and the like are excellent and should remain part of the plan.**

I also am delighted to see the proposal for the non-project environmental impact statement. That should make things easier for developers overall in both residential and business sections of the subarea.

My thinking is based on the principle that no one should suffer as a result of how we plan; all people we serve should be treated with respect.

Sincerely yours,

Angelia Alexander

Cc: Elliott Barnett, Planning Services Division

To: Elliot Barnett, Associate Planner
747 Market Street, RM 345
Tacoma, WA 98402
(253) 591-5389
tacomaneighborhood@cityoftacoma.org

September 10, 2017

RE: Tacoma Mall Neighborhood Subarea Plan

Please enter into the review process by the Planning Commission, the following comments concerning the Tacoma Mall Neighborhood Sub-area Plan. There has been a tremendous amount of work by dedicated professionals incorporated in this document, and most of the information concerning the "neighborhood's input" has been included.

But due to the nature of the project, and the prejudice of the contracted professionals (east coast mentality), I do not believe that it represents a great neighborhood with the economic viability and increased mixed use livability that it could have. By that, I mean two issues: (1) That development must assume some of the responsibility for new usage requirement of the infrastructure, and (2) must assume the responsibility of the energy savings and ecological technology to be used in construction, not the citizens who, for a large part, will be the aging, or the extremely young (w/children), unless restrictions are incorporated along with the ideals of this proposal.

Issue (1):

- a. As the population increases, along with business and transportation, there must be a fund or incoming financing from the developer that pays for the increase use (and rates) of the infrastructure, including, but not limited to: streets, utilities, water use/disposal, communications and natural gas lines to (and possibly have to increase the size of) the main lines. New development should not be carried by the citizens of Tacoma. Development will make money from the project and by *paying forward* for usage, would only be right.
- b. The infrastructure must also be assumed to include the nature of the building and the requirements of future tenants/owners. Therefore building for residents must include some type of recreation and play area for all ages of the building, including safety of some of its tenants (whether young or old). Development for business / government must have adequate waiting & lunch room/seating for its tenants and their customers, along with accommodations for stretching and exercise for their breaks. You would think that developers would include this in their design; however, some developers interested in making a "fast buck" will skillfully exclude these items unless required by the city.

Issue (2):

- a. Development must also be mindful of the ecological concerns of Tacoma citizens. Citizens wish to continue to reduce the amount of harmful substances in the air, on the land and in the water, therefore, by using new industrial standards & technology for development materials and for excessive waste and water pollution. Developers must begin using re-useable and long usage materials for all aspects of building, including, but not limited to: framing, instillation, finishing walls and paints, wiring/piping for water/gas/communications/ electrical and heating and air-condition. Developers should be required to obtain and install the most energy efficient appliances included in each design, including waste water management systems within each building to separate, and re-use, brown water. This concept also includes a possible 'park-like" or community garden space on roofs. Unless mandatory requirements from the city are enacted, developers will continue to use the cheapest, and/or sub-standard, materials necessary to complete the development.
- b. The city must be vigilant to process permits that emphasizes new building requirements, but more importantly, for the city inspections to ensure proper and safe development availability for our citizens. Unlike the Ruston Way Project, where inspectors came out "periodically" and "signed-off" on the development already completed and buried without actually being inspected.
- c. All development must include the tough "green" requirements set-forth by the city where in 2-40, 40% of the city will be a green space. But that requirement is sub-standard as the city only requires 40% of

that 40% to be evergreen foliage. Tacomans know that the worst air quality in the region is in the winter, and by mandating that 60% of new foliage will be deciduous, creates two problems: (i.) not able to absorb carbon dioxide in the fall and winter months, and (ii) creates clogged drainage for streets as this is a “transient” part of Tacoma, no-body, except some of us older ones, who are gradually dying off, really cares if street drains are clear of leaves and debris. This needs to change by regulations, to include developers and the city.

- d. 2017 and beyond is not the time to continue to mix “brown and black” water together to flow into Puget Sound. Technology exists that separates water that can be re-used, or used to nourish nature/greenery. This is essential to the water use of future generations and lowering the costs of utilities to other residents. Developers must incorporate these techniques in each and every development in Tacoma.
- e. Underground main lines for all support infrastructures to the development, including, but not limited to: utilities / communications, and water, instead of overhead “telephone poles and lines.” This concept protects the utilities, communications, and possibly others by having secured access from weather, accidents or vandalism. Increasing road-ways and sidewalks (to new standards), not just outside the development, but to the main roadways that their residents / owners / customers would use to get to that development. Once again, should not be a financial burden to Tacomans already.

The design for residential living consists of the front of the complex / homes to be at the sidewalk. Unlike our counterparts from east of the Alleghenies, Tacomans do not (as stated at numerous community meetings) want to sit on their front “stoop” and stare at their neighbors across the street. We want some greenery and space that will allow for our pets to run, child to play and BBQs without having to travel to “parks along the walk-way” to enjoy our summers. We do not want our front doors to face the allies, nor be required to park in the allies where we cannot keep an eye on them. We must draw the line somewhere, and this is a must.

Travel to and from business, appointments, schools and activities is to be through the “Bicycle and Walking route,” then healthy activities, historical or educational information and resting areas should be incorporated alongside the route. Activities should include exercises challenges for both the young and the elderly. Sitting areas for the elderly and large amounts of information consisting of current events/activities, educational (challenging) material that students will need to know to complete K-12, like quizzes and answers. Seating to accommodate those in wheelchairs, walkers or mothers needing change diapers (yes, we’ll need this in 2040).

The planning committee charged with creating a functional design for this region has done an outstanding job. But just as important as the design, are the types of business that will be available for a self-sustaining neighborhood. These include (but not limited to): a major shopping center, medical (including small surgical/E.R.) and dental and retailers and suppliers that support these services, clothing retailers, community centers, young adult and underage educational and recreation area where pre-teens and older (up to 18) may go to have adult supervision while they exercise, relax and/or do home-work and not leave these folks on the street. A senior center would be a perfect neighbor to support the Youth Center as volunteers or mentors. In order to access these places of business, the road design must include a separate left turning lane (or what’s know as a “suicide-lane”) as to not back up traffic on the “drive-through” lane on two lane arterials, both directions, allowing the right lane to support right hand turns. The idea of having mediums filled with cement or foliage (hopefully not deciduous) as currently designed in the plan is not reasonable.

I strongly agree that retailers and commercial residents should be alongside major arterials (i.e., S. Pine Street, S. 38th Street, S. 47th Street and South Tacoma Blvd. The next level on the inside of that parameter should hold the multi-family living units and, inside of that, individual housing. The present design does not represent the parks and playgrounds necessary for the residents. It mostly shows that the majority of the recreational playgrounds are on (or beside) the bicycle / walking route. This is not where the residents live. Consideration should be to have the committee examine the project again to ensure that the majority of the playgrounds (that should include all types of recreation, including but not limited to: skateboard park, tennis courts, basketball courts, rock-climbing activities, outdoor exercise equipment, balancing bars/logs, hop-skip

and jump areas, four-square and “feet following designs (as in dancing instructions).” This should also be a requirement for developers.

But in order for The Tacoma Mall Project to be generated, major assistance is needed by the owners of the S. Tacoma Mall. Present vendors do not generate major participation by either the youth or the elderly. The mall must somehow provide the service needs to accommodate its present and future customers. Things like a movie theater, teen activities center, child-care, post office/outlet, nutritional vendors and resting centers for the seniors, truly accessible potable water stations and restroom facilities. Access to the mall presently competes with the residents / business owners and customers of University Place, S. Tacoma and its Business Districts along with, N. Lakewood and Chambers Bay Golf Course. The City / State / Business partnership must create an access to 47th / 48th S. Street for (mainly) mall customers off I-5. A side benefit would be a reduction in the traffic in the S. Tacoma Area. Current plan is to ask the state to build another off-ramp I-5 at S. 38th Street. That would make that region even a greater “cluster,” than it already is.

The suggestions and future requirement recommendations in the above letter to the Planning Commission are just that. But understand that if regulations are not changed, development will continue to use sub-standard, non-environmental friendly, without paying their share of taxes (city granted tax exemptions/breaks) and continue to pass on these costs to the residents of Tacoma. Interpretation of the city’s requirement for greenery can look like the deciduous trees planted under power wires on new development sites north of S. 47th Street, and Tacomans will have the responsibility to “fix” issues in the future by increased taxation / fees /etc.

For the plan to take shape, present development (or future) must begin using the requirements set forth in the plan now as to not have to begin over, correct or modify, over the next 20 years.

Thank you for the opportunity to provide input to the Tacoma Mall Project plans and EIS.

Robert Bearden
5311 S. Pine Street
Tacoma, WA 98409
(253) 475-2818
rbearden@comcast.net

9/15/2017

Attention Tacoma Planning Commission

From Beverly Bowen-Bennett 4329 S Alder street Tacoma 98409

bbowenbennett@yahoo.com 253-651-0901

What I want to see in the Tacoma Mall Subarea Plan

I understand many of my concerns about the Tacoma Mall sub area may fall under design standards that may or may not be covered in the original document. It is my hope, mentioning them here will assure their consideration when specific codes are written concerning the infill in this neighborhood.

For someone who has never before worked on any planning short or long term within a city, this project required a steep learning curve. If in fact citizen input/involvement remains a goal for such future endeavors, I highly recommend a definition of terms at the original formation meeting. I also recommend when establishing a stakeholder committee those who give their time need to understand the time commitment at the beginning of the process. Almost more importantly stakeholder meetings need to be just that without opening to public at each meeting with newbies covering ground, asking questions answered or understood by stakeholders several meetings previous. The meetings need to have a purpose. After having attended hours of meetings and every day of the charrette, yesterday on the bus tour I learned of roundabouts planned at steele street and Tacoma mall boulevard with the transit center being moved to where firestone tire building and surrounding parking lot now sit for the first time.

I can not tell you how many times at “stakeholder” meetings we were once again ask to come up with a name for this area when the meat of the question is building standards, parks and play areas, streets, sidewalks and yes parking. There will be a future with a lot less single occupancy vehicles but we are not there yet. I hope the planning commission finds my concerns and contributions useful. I am more than willing to meet with any of you to clarify or explain my concerns and ideas.

Affordable units in all apartment complexes 15% sounds reasonable.

Consider an intergenerational housing complex such as being planned by the Tacoma Housing Authority.

Direct off ramp from I-5. Having the ramp go directly onto the Tacoma Mall boulevard as currently being suggested seems almost perfect to me

No front doors on the alleys. If developers are required to turn the alleys into a Mews, court yards or streets, the front doors then would not be on an alley. I want to see the wording **No front doors on the alley.**

A community HUB such as Madison school sight with basketball court, play area for children and seniors, meeting space, and possibly even 21st century library.

A movie theater, continuing the walk ability, and neighborhood events such as art displays in the Mall could turn the mall into a community resource as well as a shopping destination.

Light rail to area continue to encourage sound transit to not only study the feasibility but begin planning for the density we expect

Permeable streets throughout SW quadrant to optimize water quality draining into both Chambers Bay and the Foss water way

Limit on # of townhouses until design standards can be put in place to limit pitch of stairs, drive ways accommodating vehicles parking “easily” into the garage, and the structures add to the general feel of community.

Trail Connection to the Water flume trail from within the sub area two obvious connections are through public utility owned property at about 45th and union and taking cedar street through to south Tacoma Way.

I am not a fan of the loop road. It seems to me much more important to have viable access and egress to and from neighborhood.

Sidewalks of course but just as importantly pedestrian crossings for all streets including Pine and 38th at least ever 1-2 blocks especially at critical junctions such as 40th street to Post office across pine.

Before density in SW quadrant is finalized I want more scientific evidence as to at which point the permeable streets can or can not accept traffic.



City of Tacoma

Bicycle and Pedestrian Technical Advisory Group

**Members of the Bicycle
Pedestrian Technical
Advisory Group**

David Cook, Co-Chair
Daniel Hansen, Co-Chair
Theresa Beaulieu
Anne James
Jennifer Halverson-Kuehn
Leon Nettels
Susan Reehill
Jolene Rogers
Aubrey Rosevear

September 13, 2017

Dear City of Tacoma Transportation Commission:

Over the past few years, BPTAG has provided input into the Tacoma Mall Subarea Plan (TMSP) on multiple occasions. The city has integrated our suggestions thoughtfully and has done a nice job explaining why some suggestions did not appear in the final document. As with any large project, the integration of alternative priorities from multiple parties has required modifications and adjustments and we appreciate the difficulty of those decisions.

Ultimately, the City of Tacoma has incorporated BPTAG's input into the TMSP and has presented a plan with excellent focus on active transportation alternatives. We strongly support the city's goal of supporting connectivity through the use of a mixed road network. Consistent with Tacoma's Transportation Master Plan, the blank spaces in the Tacoma Mall subarea have been filled in with an effective balance of pedestrian, transit and cycling infrastructure. For transit, we appreciated the data supporting the movement and development of a new transit hub that will integrate the existing regional bus routes. For pedestrians, we like the updated requirements that create robust pedestrian access throughout large sites including a higher standard for central pedestrian access with frontage sites of over 450 feet. Cyclists will benefit not only from the infrastructure within the TMSP but also from the connectivity to bicycle infrastructure in the Transportation Master Plan outside of the Tacoma Mall subarea.

In our August BPTAG meeting, we spent considerable time discussing the proposed connection of S 37th street. While we understand local business and property owners concerns regarding reconnecting new roads within the right of way of businesses, BPTAG feels that the city and business owners have achieved an appropriate balance of preserving relatively large parcels for businesses (even with the addition of S 37th Street), while improving connectivity for both bicyclists and pedestrians by reducing a few of the very large parcels. The TMSP includes triggers and incentives that would govern such development, meaning these roads will not be constructed soon and developers maintain control of redesigns that would trigger such development. However, as the landscape of the Tacoma Mall Subarea changes, we feel that the connectivity goals need to be maintained, as outlined in Transportation Master Plan and reflected in the TMSP. South 37th St. is particularly strategic as it connects Pine St. (with proposed bike lanes) with the Loop Road, South Tacoma Way, and access to the Water Flume Trail.

Thank you for your hard work on the TMSP and attention to making the Tacoma Mall area accessible to active transportation options.

Sincerely

Daniel Hansen
Co-Chair

David Cook
Co-chair

Staff Liaison:
Meredith Soniat
253-591-5380

City of Tacoma
Public Works Department
Engineering Division
747 Market St. Room 644
Tacoma, WA 98402

Cc: City of Tacoma Planning Commission

What we like about the Sub Area Plan

- City interest in the neighborhood
- Creating a transit center and working to bring rail to the area
- Brining more of an identity to area and creating a destination
- Improvements to existing streets
- Grant \$ for street improvements and help revitalizing the neighborhood.
- Recognizing the neighborhood is residential, commercial, and industrial in nature.

Connectivity

We are watching the biggest economic boom in the Seattle area. 50+ cranes and not yet seeing in Tacoma. It is indicative. Looking forward to Tacoma Mall neighborhood boom.

#1 concern you have heard from property owners has been about connectivity and often overlooked onerous attributes of connectivity that stifles progress and redevelopment including the time frame up to the point of major redevelopment.

Logically happens when market demands and at the time of major redevelopment. Bulldozer comes out. Major development defined as 50% of valuation (15% trigger much too low). At that time will address connectivity within site & neighborhood

If try and have connectivity either in plan or actual prior to major redevelopment creates economic barriers. Unnecessary in this economically sensitive area. Negotiating with neighbors. Losing deals while waiting or permitting approvals

- Beware of creating barriers. Need incentives to build connections, not more restrictive regulations.
- Allow, but don't require, through connections to be combined with emergency access serving a parcel.

Chopping up parcels with a connectivity plan and/or actual implementation limits buildable square footage and restricts flexibility. Property owners are unable to maximize the value of property given the restrictions.

The frequency and size of connections creates a burdensome environment for current owners, businesses as well as future developers. Appropriate time for connectivity is at the time of major redevelopment and with more modest connectivity goals.

***what is being proposed is breaking down a 16 acre site into 32 one-half acre sites

Connectivity has its place but there is value in large parcels. Developers and government need assemblage. University of WA Tacoma, Convention Center, Tacoma Dome, Central Police Facility. Malls, Convention Center, Corporate Campuses, Midsize Shopping Centers = large parcel

37th Street

Continue to question the cost/benefit of 37th when there are viable alternatives at lower costs and without topography issues and significant ROW acquisitions. For example, extending 35th and Cedar Streets to connect to South Tacoma Way and the Water Flume Trail.

If 37th is deemed necessary by the City then it should be a Tier 1 Street which is City led, City funded ROW acquisitions, and City constructed. It should also be built both east and west of Pine Street as topo allows.

Eleanor Brekke
eleanor@brekkeproperties.com
Cedar Plaza

John Brekke
john@brekkeproperties.com
Cedar Plaza

BREKKE PROPERTIES
PO BOX 287
MEDINA, WA 98039
(425) 451-1511

September 15, 2017

Mr. Stephen Wamback, Chair
City of Tacoma Planning Commission
747 Market Street
Tacoma, WA 98402

Dear Mr. Wamback and Members of the Planning Commission:

RE: Tacoma Mall Subarea Plan and EIS

As owners of the Cedar Plaza shopping center located in the NW Quadrant of the Tacoma Mall neighborhood, we have actively participated in the public process concerning the Tacoma Mall Subarea Plan. The decisions of the Planning Commission will have a direct impact on our property and our tenants, and it is in the spirit of public-private partnership that we offer our comments on the Tacoma Mall Subarea Plan and Environmental Impact Analysis.

We want to acknowledge the tremendous effort that has been put forth by the Planning Commission and staff over the past 18 months to bring the Tacoma Mall Subarea Plan to its final stages. There are a number of initiatives we support including:

- Neighborhood Infrastructure – significant City investments in new sidewalks, street lights, street trees, storm water drainage system improvements, the Loop Road and additional bicycle and pedestrian connections to South Tacoma Way and the Water Flume Trail.
- Regional Transportation Improvements – City leadership to bring more transportation options to the Tacoma Mall neighborhood such as:
 - Second I-5 interchange to relieve pressure at 38th and Steele;
 - Pierce Transit station located more centrally within the neighborhood and the addition of express bus service; and,
 - Sound Transit light rail and Sounder stations nearby to serve the neighborhood.
- Height, zoning, design standards, and city improvements to the regional storm water facilities to serve the area.
- SEPA - The City's decision to complete an upfront Environmental Impact Statement is of considerable value to private property owners and is a tangible benefit that will help both existing businesses when they wish to expand their facilities and new development coming to the area.

While the City's proposed capital investment and economic development focus for the Tacoma Mall neighborhood is exciting and supported by the business community, there are elements of the Subarea Plan that continue to be a cause for concern.

For all the apparent hustle and bustle of the Tacoma Mall neighborhood, the economic underpinnings of this area of the City is deceptively fragile. When compared to other properties we own and manage in the South Sound region, retail-office-warehouse space in the NW Quadrant of the Tacoma Mall neighborhood rents for less than our industrial warehouse space in Kent. Of considerable concern is the structural change taking place in the retail shopping industry and the way business is conducted, making retail centers no longer the predictable property investment it has been. All this is to say that new regulations should support business retention / expansion and recruitment without creating or imposing burdens for private property owners.

Our greatest concerns fall into the broad categories of connectivity and the characterization of large blocks. These issues remain the greatest concern of private property owners in the Tacoma Mall Neighborhood

We considered several formats that might be used to most effectively provide our public comments; for instance, a narrative supported by spreadsheets or a line-by-line editing of the City's proposed code changes found in Appendices LU-2, pages 34-50, etc. In the end, we chose to outline a simple approach we can begin to support and that we feel could bring mutually desirable results. The following brief summary spells out the elements of that approach.

CONNECTIVITY

1. Use existing Rights-of-Way when available

- Use existing city-owned rights-of-way for the Loop Road bicycle and pedestrian trail.
- Extend South Cedar, So. 35th and So. 40th Streets westerly to connect with South Tacoma Way and the Water Flume Trail.

2. Proposed Future 37th Street

If the City determines the proposed 37th Street would be effective in improving neighborhood-wide connectivity, we would support the construction of 37th with these changes:

- 37th Street would be classified as a Tier 1 Street;
- 37th Street would be built on both sides of Pine Street as topography allows (east to Fife Street and west to existing 37th Street);
- 37th Street would be a City-led and City-funded project including right-of-way acquisition, design, and construction.

3. Connectivity Framework – Subarea neighborhood

Larger blocks should not be required to be divided any less than a 600' x 600' block configuration for the Tacoma Mall neighborhood to accommodate and enhance multi-mode travel (vehicles, bicycles, pedestrians, and transit).

4. Internal Connectivity

Replace the very complicated proposed connectivity requirements / connectivity plan with a 300'x 600' network of Tier 3 bicycle / pedestrian connections to establish an urban framework for the neighborhood.

- Internal pathways with alignments allowed to meander to accommodate buildings, above ground utilities, or other impediments.
 - *Note: The WSDOT bicycle and pedestrian standards for the newly constructed bike/ped trail built on a major commuter route on the north side of the SR520 floating bridge to connect nonmotorized travelers to and from Seattle and the east side of King County is 14'. There is no justification in requiring the subarea through block connection to be equal or greater than 14'. Bike/ped trail in the subarea are major commuter routes therefore a 5'-10' is more appropriate.*
- Triggered by major redevelopment defined as “improvements exceeding 50% of the value of existing development or structures as defined by the Building Code, unless specifically exempted” (see language taken from Appendices LU-02, page 34, TMC 13.06.12). Tenant improvements, façade and site improvements would be exempt from the major redevelopment calculation.
 - *Tenant improvements and site improvements are necessary to attract quality tenants. Façade improvements improve the aesthetics of the neighborhood. A private property owner should not be penalized for improving their property.*
- The proposed connectivity threshold triggers are much too low. Most routine leasehold improvements for larger tenants or higher value tenants would trigger the connectivity plan requirement (see proposed TMC 13.06.512 General Applicability, Appendix LU-2, page 34).
 - *In no event should thresholds be more stringent than those found in the current Tacoma Municipal Code and an exemption should be added for tenant improvements, façade and site improvements.*

The proposed connectivity plan / process is complex, rigid and onerous. It's a process that requires a private property owner to notify and then negotiate with neighboring property owners to determine connectivity alignments. It's a process that creates a recorded and legally binding document that may well have to be 'undone' when major redevelopment takes place, and it may not be suitable for highest and best use in the future.

This legally binding commitment would not only dictate future development but could have the unintended consequence of stifling property improvements because property owners won't want to make improvements that will trigger the connectivity plan requirement. The city's connectivity policies will have an impact on mortgage financing, future lease negotiations and the sale of a property. A property owner who went through the arduous process of designing a connectivity plan and having it approved would have to repeat the same approval process if the connectivity plan needs to be changed in the future. This would require additional time and money for both the private property owner and the city.

Designing a connectivity plan at the time of major redevelopment allows the property owner to design connections in context with the new development rather than guessing at what might be best, where buildings might be located, the possible configuration and size of a future building footprint, etc. To design site improvements within the constraints of a pre-determined and legally binding connectivity plan seems to be the tail wagging the dog.

As avid cyclists and daily pedestrians, we understand connectivity and the benefits it can bring to a neighborhood. Nevertheless, the proposed connectivity process and requirements spelled out in the proposed changes to the Tacoma Municipal Code are complicated with real consequences to private property owners. The same effect can be achieved without having to file and record a connectivity plan by implementing a policy calling for Tier 3 bicycle/pedestrian connections as outlined above.

We ask for your serious consideration of the simpler and yet effective approach outlined above. In addition, we have attached our recommendations for transportation improvements outlined in the Subarea Plan, Table 2, Project List, page T-26.

LARGE BLOCKS

The Subarea Plan and EIS characterize 'large blocks' and 'very large blocks' as undesirable and a condition to be remedied with a network of east-west and north-south streets supplemented by bike and/or pedestrian paths built at intervals of 150'. While the EIS states that Medium and Long-term maps for the neighborhood are 'illustrative not directive' (EIS Page UF-6), the proposed code changes (Appendices LU-2 pages 34-50) dictate a prescriptive and predictable pattern with little consideration of existing property boundaries and patterns of ownership. The proposed code changes provide connectivity requirements that would essentially subdivide properties into a grid of smaller development parcels and eliminate flexibility for future site planning.

We contend large blocks can be a benefit to business recruitment efforts of the city and local economic development agencies. Indeed, Catalyst Sites in the Subarea Plan include large blocks. The City of Tacoma has considerable experience in the assemblage of large blocks of property for signature projects in the downtown Regional Growth Center such as the Tacoma Dome, University of Washington Tacoma, Greater Tacoma Convention and Trade Center, and the original Central Police Facility site.

Recent regional examples of property assemblage include South Lake Union in downtown Seattle, Kent Station, and Bothell Crossroads project. The City of Kent purchased a 20-acre industrial site that was located next to a Sounder rail station, designed a site plan with new street and bike/pedestrian connections, and then sold the development site at a discount to a private developer that carried out the city's site plan. The City of Bothell spent \$53 million to purchase property and another \$100 million to demolish buildings and build a desired street network. Bothell then sold the remaining property they had purchased as pad-ready development sites to private developers.

CATALYST SITES

Focusing the majority of improvements in the NE and SE quadrants of the Tacoma Mall neighborhood could create a vacuum or a diversion, leaving the NW and SW quadrants in the shadow of the more improved parts of the neighborhood. In other words, the perception could become that the farther away from the area being improved, the less desirable could be the properties.

1. Consider designating an aggregation of vacant or severely underutilized properties in the north end of the Northwest Quadrant.
2. Goodwill/Outback Plaza (and potentially in combination with abutting properties to the north, east and west).

In closing, we are excited about the prospect of approximately \$125 million in infrastructure improvements that could be made in the Tacoma Mall neighborhood over the next 20 years. These changes will make a noticeable improvement in the neighborhood's image, and in turn, spur economic development and investment by the private sector.

Sincerely yours,



John Brekke
Brekke Properties



Eleanor Brekke
Brekke Properties

cc: Elliott Barnett, Planner

Attachment: Suggested priorities for Near- and Mid-Term Transportation Projects (Subarea Plan, Table 2, Project List, Page T-26)

Suggested priorities for Near- and Mid-Term Transportation Projects (Subarea Plan, Table 2, Page T-26)

Focus on near-term and mid-term improvements – These investments will enhance the neighborhood’s image and build stronger market demand that, in turn, will lead to more private investment. Incremental change will be most effective in reaching long-term goals.

Near-Term Priority Project

1. Area-wide sidewalk gaps
2. Loop Road Demonstration Project
 - Include Lawrence between So. 36th and So. 38th Street
 - Include So. 36th between Lawrence and Pine Street
3. 38th and Steele Street Intersection Improvements
4. South Cedar, 35th and 40th Streets extended to the west on existing rights-of-way to South Tacoma Way and the Water Flume Trail
5. Tacoma Mall Transit Center, Design Phase I
 - Select a location closer to the center of the neighborhood, future Sounder station and Water Flume Trail to support residents, employees, and visitors.

Mid-Term Priority Projects

1. Intersection improvements on 38th Street from Cedar to South Tacoma Way
2. Loop Road, Phase 2
3. Transit Center, Phase 2
4. Sounder Rail Station and commuter parking garage

From: [CHARLES BROWN](#)
To: [Barnett, Elliott](#)
Cc: [Art Redford](#); [VALERIE MUNOZ](#); [Jay Petersen](#); [Mello, Ryan](#); [Blocker, Keith](#); [Thoms, Robert](#); [McCarthy, Conor](#)
Subject: Tacoma Mall Neighborhood Subarea Plan
Date: Thursday, September 14, 2017 4:23:45 PM

Mr. Barnett -

It was nice to meet you yesterday and thank you for the tour of the Tacoma Mall Neighborhood. It is clear that you have put a lot of time and effort into creating a growth vision for the area.

As I noted yesterday, my client has substantial concerns with, and opposition to, the direct impacts of the proposed connectivity plans affecting the Michaels Plaza shopping area. They are particularly concerned with the proposal to establish a new road connecting Pine St. to South Tacoma Way at what would be considered 37th Street. This would effectively cut through the middle of this private property and would have a substantially negative impact on this property.

All the documents I have reviewed in the August 11, 2017, Tacoma Mall Neighborhood Subarea Plan & EIS Appendices seem to suggest that other streets could possibly be designated in this area, effectively cutting up the property in a north/south direction as well. This part of the proposal was not discussed yesterday. My client would also oppose adoption of such amendments to the code.

I would be interested in meeting with you to discuss the proposal as it stands, and suggest amendments that would eliminate my client's opposition to the proposal.

Please let me know of your availability.

Thank you,

Charlie Brown



Charles R. (Charlie) Brown
Attorney
253-906-6685
cascade_gov_affairs@me.com

From: gassigns@frontier.com
To: [Barnett, Elliott](#)
Subject: TMNSP; Comments
Date: Friday, September 15, 2017 5:19:32 PM

Elliott-

To reiterate all my previous public testimony.

The plan is too bold in asking for the 37th street ROW and improvements. It will devalue our property as the current zoning is not supported by the market at 65 feet and the granting of zoning height up to 75 feet and 120 feet with incentives will not be supported by the market anytime in the next 30 years and therefore does not come close to offsetting the cost of the new street requirements. In fact, the requirement actually discourages re-development because it makes development even more expensive and certainly less profitable, exactly opposite of the intent of the plan to create a vibrant, active community. Maybe this plan would make sense 50 years from now, but it doesn't today with the goals the plan is trying to achieve of a vibrant community for business and people to live and play.

If the plan must include this connection then the triggers must be increased significantly to ONLY significant development projects (tear down and re-build developments). These connectivity plans and busy work need to be removed from the code as they are far too onerous and don't provide any significant value, and are nearly impossible to administer considering other property owners would have to agree to our rendition of "the plan". The City is overstepping in this regard as the ask is too great for the return to the property owners.

Forcing connections and pathways as part of minor TI work, interior or exterior, or building additions is also overstepping in regard to ask versus return. The revamping of existing parking and drive isles to insert a pathway just adds expense for very little benefit.

Thank you for all your openness and communication. I appreciate it even though we may not agree on all the issues.

Thanks.

John Burkhalter
425.246.7050

From: jon.castle@comcast.net
To: [Tacoma Mall Neighborhood Subarea Plan project](#)
Subject: New Form Entry: Comment form- Participate Page
Date: Friday, August 18, 2017 9:58:18 AM

You've just received a new submission to your [Comment form- Participate Page](#).

Submitted Information:

Name

Jon Castle

Email

jon.castle@comcast.net

Comment

It is my hope that ADEQUATE on-site PARKING and STREET SIZES are INCLUDED in the plan for increased population density!!! That, in my view, would be at least one parking spot for each anticipated adult...PLUS consideration for visitors. Also, street overpasses to accommodate added pedestrian traffic, to and from planned facilities. It is not fair to current property owners to impinge upon their existing spaces.

From: [Chipps, Eric](#)
To: [Barnett, Elliott](#)
Cc: [Levy, Chelsea](#); [Kitsis, Karen](#); "dstavish@piercetransit.org"; dbloom@intercitytransit.com
Subject: RE: PUBLIC REVIEW DRAFT SUBAREA PLAN AVAILABLE
Date: Monday, September 18, 2017 1:32:40 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Elliott:

Congratulations on completing the Tacoma Mall Neighborhood Subarea Draft Plan and Draft EIS. We appreciate the invitation and opportunity for Sound Transit to review and comment on these documents. Our comments are provided below. Please let me know if you have any questions or would like to discuss.

Thanks, and look forward to continued collaboration with the City on improving its transit services and ridership.

Best regards,
Eric

Eric Chipps
Sound Transit
Office of Planning and Innovation
Office: (206) 398-5020
Email: eric.chipps@soundtransit.org

-

Sound Transit Comments

DRAFT SUBAREA PLAN

Action T-9 (pg. T-18)

Changes to ST Express bus service are considered and proposed through the annual update of the Sound Transit's Service Implementation Plan (SIP). The current 2017 SIP does not anticipate any additional stops along ST Express services between Lakewood and Tacoma Dome station or Seattle. An additional stop serving the Tacoma Mall transit center would increase the travel distance and time of existing ST Express routes that utilize I-5 through the Tacoma Mall area. Such an increase would require service hours being removed from other routes, or additional service hours that are not anticipated in the 2017 SIP.

Action T-13 (pg. T-18)

Note that adding a Sounder station between South Tacoma and Tacoma Dome stations was not considered in the most-recent update of Sound Transit's Regional Transit Long-Range Plan (in 2014), and funding for a new Sounder Station is not included in the 2016-approved ST3 system plan.

Table T-2, Project 6 (pg. T-27)

The proposed project is to study and design a new, relocated Tacoma Mall transit center and anticipates that this facility could be utilized by both Pierce Transit and Sound Transit services. While the potential for light rail high-capacity transit (HCT) service between Tacoma Dome and DuPont via the Tacoma Mall area is included in the 2014 Long-Range Plan, and a planning study of extending light rail from the Tacoma Dome to Tacoma Mall is funded in ST3, the schedule for conducting this study has not been determined. Using past agency practices as a rough guide, planning studies for future high-capacity transit corridors would likely not commence until midway through the implementation of the current system plan, which for the ST3 plan would approximately be the year 2025-to-2033 period. Hence, it may be premature to identify Project 6 as a "Near-Term Priority" project in Table T-2 if coordination with a future Sound Transit HCT planning study is desired and anticipated. Perhaps incorporating Project 6 into Project 8 (i.e., the "Mid-Term" project for a new transit center) within the table is more prudent.

Transit Investments (pg. T-36)

Refer to comments above regarding ST Express bus service changes, Tacoma Mall transit center, and the future HCT planning study.

DRAFT EIS APPENDIX

Appendix B - Existing Plans and Policies (pg. PP-2 and pp. PP-35/36)

Even though I realize this appendix was developed in March of 2016 prior to ST3 plan being approved by the voters the following November, you may want to update it to include a note acknowledging that ST3 (technically, the "Sound Transit 3 Regional Transit System Plan for Central Puget Sound") has passed and Sound Transit has commenced its implementation. You may also want to clarify that the plan includes a project for extending light rail to Tacoma Dome (by 2030) station but not to "to the Tacoma Mall Regional Growth Center" (as stated on pg. PP-36, last sentence of *ST LRP Goals* section).

=== End of comments ===

From: Barnett, Elliott [mailto:elliott.barnett@ci.tacoma.wa.us]
Sent: Friday, September 01, 2017 3:24 PM
To: Levy, Chelsea; Chipps, Eric; 'dstavish@piercetransit.org'; dbloom@intercitytransit.com
Subject: RE: PUBLIC REVIEW DRAFT SUBAREA PLAN AVAILABLE

Hi Chelsea, Eric and Darin and Dennis,

It would be ideal to receive comments on the transit related actions from your agencies. That would be very helpful. Can you swing that by 09/15? Thank you!

The transit actions are on pages T-17 to T-19. I will paste them below:

September 11, 2017

TO: Chair Stephen Wamback and Tacoma Planning Commissioners
FROM: Tacoma Mall Neighborhood Coalition of Private Property Owners
RE: Tacoma Mall Subarea Plan - Public Comment

As private property owners in the Tacoma Mall Neighborhood, we have been tracking the Tacoma Mall Subarea Plan for the past 18 months and are submitting the following comments for your consideration as you deliberate your recommendations to the City Council.

1. Connectivity – This issue remains the greatest concern of private property owners in the Tacoma Mall Neighborhood. The proposed connectivity process and requirements are a burden with real consequences to private property owners.

- Any connectivity requirements and/or plan should be designed and implemented at the time of major redevelopment. Major development should continue to be defined as new development and alterations, that within a two-year period, exceed 50% of the value of existing development or structures. Threshold and changes to pedestrian and bicycle support standards should not be modified in any way to make such requirements more stringent than current existing requirements throughout Tacoma, including in the Tacoma Mall Sub Area. In addition, it is paramount that tenant improvements – both internal as well as external façade improvements -- be exempted from the threshold triggers. Tenant improvements are necessary to attract quality tenants, and façade improvements improve the aesthetics of the neighborhood. A private property owner should not be penalized for improving their property.
- The burden of the proposed incremental requirement for through-connections across private property at intervals of 150' outweighs the benefits – wait for the time when major redevelopment takes place for through-connections to be built in context with new buildings or site layout. Any required through-connections, including enhanced through-connections, should be completed in a manner that is least impactful to the division of existing parcels.

Existing large parcels can be a benefit when recruiting larger scale medical facilities, corporate operations such as the newly announced Amazon headquarters requirement, and public facilities including governmental offices.

The proposed code changes provide connectivity requirements that would essentially subdivide properties into a grid of smaller development parcels and eliminate flexibility for future site planning.

2. Neighborhood Infrastructure - We are excited about the prospect of approximately \$125 million in infrastructure improvements that could be made in our neighborhood over the next 20-25 years. These changes will make a noticeable improvement in the neighborhood's image, and in turn, we hope will bring greater economic stability to those doing business in the area. We support the City's investment in new sidewalks, street lights, street trees, stormwater drainage

system improvements, and bicycle and pedestrian connections to South Tacoma Way and the Water Flume Trail. We urge the City to:

- Use existing public Right-of-Way for the proposed Loop Road bicycle and pedestrian improvements.
 - Extend South Cedar, 35th and 40th Streets westerly to connect the neighborhood with South Tacoma Way and the Water Flume Trail.
3. Regional Transportation Improvements – We encourage City leadership and working with other agencies to bring more transportation options to the Tacoma Mall neighborhood discussed in the Subarea Plan and EIS
- Additional I-5 interchange that would take pressure off the 38th St. / Sprague intersection.
 - New Sound Transit train station nearby to serve the neighborhood.
 - Pierce Transit station located more centrally within the neighborhood and adding express bus service.
4. SEPA - The City's decision to complete an upfront Environmental Impact Statement is of considerable value to private property owners and is a tangible benefit that will help both existing businesses when they wish to expand their facilities and new development coming to the area.
5. Focus on near-term and mid-term improvements – City funded investments will enhance the neighborhood's image and build stronger market demand that, in turn, will lead to more private investment. Incremental change will be most effective in reaching long-term goals.

Signed - Tacoma Mall Neighborhood Coalition of Private Property Owners:

Paul Etsekson, Active Investment Co., LLC

David A. Shammass, McDonald's USA

Glenda Hollenbeck, McDonald's USA

Dave Dearth, Dobler Management Co Inc

Dennis L. King, NEI Investors, LLC

Dr. David Clark, Bioclear Matrix

Patrick L. Hughes Sr., Hughes Group

Valerie Fyalka-Munoz, KAMG Management Corp.

Jay Petersen, KAMG Management Corp.

Andy Jessberger, First Western Properties

Byron Richmond, Action Business Furniture

Ray Velkers, First Western Properties

Art Redford, Michael's Plaza

Jack Menashe, CAP Associates

Dr. J Antonio Garcia, CAP Associates

John Burkhalter, CAP Associates

Stan Huse, CAP Associates

Brent Norris, CAP Associates

John W. Brekke, Cedar Plaza Partners, LLC

Eleanor Brekke, Cedar Plaza Partners, LLC

Phyllis Ohrbeck, Coronet Apartments

cc: Elliott Barnett, Planner

From: [Barnett, Elliott](#)
To: [Barnett, Elliott](#)
Subject: Comments on the Tacoma Mall Plan PLEASE!
Date: Thursday, September 14, 2017 3:43:14 PM

From: Kristine Coman [mailto:kcoman@uw.edu]
Sent: Thursday, September 14, 2017 3:08 PM
To: Barnett, Elliott
Subject: Re: Comments on the Tacoma Mall Plan PLEASE!

Hello Elliott,

I just finished reading the Subarea Plan (just about every page) and briefly checked out the Appendices (I could not get the font to enlarge so I just skimmed it to prevent eye strain). First, I thoroughly enjoyed reading the Tacoma Mall Subarea Plan. It was easy to read, well laid out, and the colors and graphics are relevant and pleasing to the eye.

What I like about the Subarea Plan:

- The emphasis of a Triple Bottom Line approach (very nice) which was explained well and makes one realize the City of Tacoma cares about their residents.
- You know my favorite part of the Subarea Plan is the Loop Road. This is going to be a key factor in bringing the neighborhood 'together' as well as providing a tourist/exercise attraction if art and green spaces are liberally placed. Although, being a 'park head', I would have like to see more green spaces in the long-term plan.
- Five minute walkable neighborhoods: well defined and another favorite attribute of the Subarea Plan. This, along with the Loop Road, will make the neighborhoods very desirable places to live. Even employees will be able to enjoy walking outside in the fresh air at lunch...easy access to food and easy access to mid-day walking to increase health and make one's day more engaging.
- Under Internal Loop Road and Parks, it was mentioned that residents will be able to participate in art and art placement - excellent way to retain residents, create partnerships and increase human and social capital.
- Expanding the RGC's boundaries to include the section(s) by South Tacoma Way is a great idea and will expand the tax base for the neighborhood.
- The Chapter 3 Goals and Actions Table is great - easy to follow and use as a resource while looking through the Subarea Plan. The only thing that would make the chart better would be to add the page numbers where each goal or action is addressed in the Subarea Plan.
- A lot of the goals were making me smile: CV-2, CV-4, CV-6, CV-22, CV-23, SP-2, SP-9; as well as Actions CV-11, CV-13, CV-15, SP-10.
- Another great tool is Table IMPL-3 for Priority Early Implementation Actions and Prioritization Criteria. Great job.
- The Subarea Plan mentions that it will work to prevent displacement of current residents; and, Community Development Corporations and Community Land Trusts are mentioned in Chapter 11 for implementation tools. If I lived in he neighborhood, my biggest concern with the Subarea Plan would be - will I be able to afford to stay in my home/residence once new/re-development beings or is complete? Establishing

Community Land Trusts may be a great way to make sure current residents are not displaced.

What I would like to see:

- In the very beginning (page 1-4), the importance of the neighborhood as a watershed for the South Tacoma Aquifer should be emphasized more. Yes, the area is a RGC, but is also a main supplier of ground water and needs updated to green standards, which benefits everyone connected to the Tacoma watershed.
- The Local Improvement District (LID) idea sounds like something a neighborhood should be able to vote on. I understand the need to impose an LID; however, if I was a senior citizen that owned my home, maybe I would be more likely to support an LID IF my lot could be grandfathered in without the new tax with some sort of restriction when the homeowner sells (so that the new owner picks up the lot's LID tab). I'm not sure how to work something like this out. I just know that a lot of senior citizens are on a fixed income. Of course they want improvements, but they cannot afford it nor should they be denied access to them.

Questions:

- Goal H-2: this discussed AMI percentages pertaining to new housing. Do current figures for the neighborhoods match what the plan proposes? For example, 25% new housing for households earning 80% PC AMI & 12.5% at 50% of AMI or less - would these percentages be able to support the residents in need now that currently meet the AMI's presented?

There are a couple typos. I noted this one: page 1-10 Paragraph Header "City Council and City Commissions" is not in Bold like the other headings. Also, I noticed some of the extra information on the left side of the pages (which I enjoyed reading) had grammar errors or did not end in a complete sentence (when I looked for the rest of the sentence on the next page it was not present or by then I had forgot to look for the ending).

Regarding the EIS, no action is not good. I didn't have time to read every page, but what I did read made perfect sense.

I hope this input is useful. Thank you for all the hard work you put into the Tacoma Mall Neighborhood Subarea Plan.

Best Regards,

Kristine Coman



September 14, 2017

Mr. Elliott Barnett, Senior Planner
City of Tacoma Planning and Development Services
474 Market Street
Tacoma, WA 98402

Subject: Tacoma Mall Subarea Plan – Comments on Draft Plan

Dear Mr. Barnett:

Thank you for the opportunity to comment on the draft Tacoma Subarea Plan. The County is pleased to have had the opportunity to be a partner in the Subarea Plan development and continues to be very interested in the progress of the Plan. The County supports the general directions of this planning effort but with one specific objection regarding a proposed road crossing the County's Annex Campus.

Request for Removal of S. Wright Avenue Future Road Alignment

The draft Plan shows an extension of So. Wright Avenue between South 35th Street and South Tacoma Way, as shown on Figure I-5 of the Draft Plan, which bisects the existing Annex building and Annex campus. The County objects to this proposal of the Plan and specifically requests that the connection be removed from the County's Annex campus location.

The County has expressed concerns and objections regarding this proposed road on several occasions. We expressed our concern and need for coordination in our letter of August 30, 2016 and later registered specific objections to the road during regular stakeholder meetings over the last year-- specifically in our one-on-one stakeholders meeting with the City in the fall of 2016; in testimony before the Planning Commission on January 15, 2017; and most recently, on September 6, 2017.

The proposed road connection would conflict with the existing Annex Building, which will be retained for the foreseeable future, and with the possible future use of the Annex Campus. A required road across the site would seriously impair the ability to use the Annex campus site.

The proposed road is shown as a Bike Boulevard in Figure T-3 in the Draft Plan. As a Bike Boulevard, the road does not advance the overall connectivity scheme or creating of the street grid as envisioned of the Subarea Plan. It is a 10-15% grade road that is far from bike friendly. There are better grades and access alternatives on Sprague Avenue which is used more by cyclists. The Bike Boulevard also does not appear to be a priority as it does not show up on the Near and Mid or Long term priority maps as shown in Figures T-12, 13 and 14 in the draft Plan.

For the above reasons, the County stridently and respectfully requests the removal of the proposed connection from the Tacoma Mall Subarea Plan.

Other Recommendations

Transit and Transportation

We recommend a direct transit route between the Tacoma Hub and the Tacoma Mall Subarea by way of South Tacoma Way. We see this connection as critical to serving employees who live in unincorporated Pierce County or outlying cities who may use the train to commute into Tacoma.

Parks and Greenspace

We recommend the Plan include the enhancement of existing park facilities or the addition of new park and or open space in close proximity to the Annex site. This will enhance the employee experience by providing areas for the employees to get outside during lunch times and breaks.

County Support for Plan Elements

The County supports many of the elements of the Subarea Plan that will benefit the Tacoma Mall area and the County Annex site. The County appreciates that the City provided the opportunity for the County to financially contribute to the Subarea Plan work and thereby expand the scope of analysis so that the Annex Campus is included in the Plan area and agrees that the campus is an asset as a major employer as is recognized in the Shared Prosperity section of the Plan (SP-17). The County supports:

1. The Loop Road and improved pedestrian crossing of South 38th Street;
2. The Green Streets program,;
3. The relocation of the transit station, which will make it much closer to the Annex;
4. The Storm Management plan and use of Low Impact Development techniques; and,
5. The proposed zoning for the Annex Campus.

Thank you again for the opportunity to comment on the draft Tacoma Mall Subarea Plan. We look forward to participating in the remainder of the planning process.

Sincerely,



Bruce F. Dammeier
Pierce County Executive

C: Bret Carlstad, Director, Facilities Management
Dennis Hanberg, Director, Planning and Public Works
Rick Tackett, Real Property Specialist, Facilities Management
Sean Gaffney, Planning Manager, Planning and Public Works

From: [Dave Dearth](#)
To: [Tacoma Mall Neighborhood Subarea Plan project](#)
Subject: Re: COMMENTS DUE THIS FRIDAY
Date: Wednesday, September 13, 2017 11:28:18 AM
Attachments: [image002.png](#)

Mr. Barnett,

I wanted to provide you with these written comments for consideration as they pertain to your Tacoma Mall Neighborhood Subarea Plan Project. My company has had an investment in the success of the Tacoma Mall Area since 1973. We currently have 803 apartment units and the largest vacant land parcel within the Subarea, our commitment totals over 125 million dollars. I very much appreciate yours, and the City's intensive interest, and commitment in the area the last couple of years.

There is very much to like within the plan, and also some major problems, in my opinion the good and bad are as follows:

1. The new I-5 off-ramp to Tacoma Mall Boulevard is great.
2. The Loop is a great way to create a sense of community and identity, but it does not need to be so heavy handed. In order to not chop existing businesses in half and punish longstanding investors in the area, the Loop can look very green and snake along in some areas, and look more urban (along 38th) with 90 degree turns and brick pavers in others.
3. I have a 136 unit apartment on Cedar St between S47th and S45th, I spent 300k to run the storm line three blocks to S Pine ST and then more to the City for the right to dump storm water into there system, and then a bill every month. The threshold for conforming to the new Subarea Plan should be a 50% reconstruction not 15%, one medium fire and I throw my previous infrastructure investment out the window and I'm installing new infiltration lines, no disrespect but ten years later the City will be scratching there head wondering why there is no Affordable Housing, and I don't mean low income.
4. The Plan calls for it's highest density housing closest to the Mall, this makes total sense, but the quickest way to achieve the goal is not to draw a line around the largest undeveloped parcel (ours) and label it a Proposed Park. Large parcel developments can have great opportunities for open spaces, urban plazas with retail mixes, mid rise buildings stuffed on small infill lot's only have so much appeal. This proposed park site should be on the Old School Site already publicly owned and more central to the Subarea and it's housing.

Thank you for your consideration, Elliott, you have been a pleasure to work with and get to know, and you are a great ambassador of the City. There has got to be a way to achieve some of the great ideas in the plan, without crushing the very people that have worked hard to survive and promote the area.

Dave Dearth
President or Asset Development
Dobler Management Co Inc

From: Tacoma Mall Neighborhood Subarea Plan project <tacmallneighborhood@ci.tacoma.wa.us>
To: Tacoma Mall Neighborhood Subarea Plan project <tacmallneighborhood@ci.tacoma.wa.us>
Sent: Tuesday, September 12, 2017 3:05 PM
Subject: COMMENTS DUE THIS FRIDAY

REMINDER – Friday, September 15, 2017 is the deadline to submit your comments on the draft

September 13, 2017

Mr. Barnett
RE: Tacoma Mall Neighborhood Subarea Plan Project

Dear Mr. Barnett,

I want to thank you for the time and energy you have invested in the city's proposed future development of the Tacoma Mall Neighborhood.

My management company, Dobler Management Company, Inc. and my various investment LLCs have been involved in the Tacoma Mall area since 1983. I have managed multi-family properties, renovated and built new properties in the Mall vicinity and currently own over 850 apartment units. I take pride in producing affordable, safe, highly attractive housing for my residents. The Mall area is a working class neighborhood with very solid people looking for well maintained housing. I provide that for them. I have invested heavily. My office is on 47th Street. I see a lot in the happenings around the vicinity and know the community well.

Attributes of the development proposal are the new road off of Tacoma Mall Boulevard and the green "loop" road. But I do have concerns about the condemnation of property, the storm system and roads.

We need walkability. I agree with the concept of the loop. But, you do not need to force the loop into developed properties. The loop can stay on current city streets and be effective. Use what we already have, but augment with landscaping, lights, plantings and rest stops. Do not force the loop into new developments either without first utilizing the existing streets and sidewalks. A walk way in the middle of a development is not exactly positive in the neighborhood.

The schools in South Tacoma are weak. Families do not live here and won't live here until the schools are academically attractive. My residents have babies, but leave to better school districts once the children are school age. This will not change. It hasn't for fifty years. The city should expect a diverse, but younger resident base or childless base in its population demographic. Although I always have play areas designated in my properties, they are only used by toddlers. A large proposed park, which has been depicted on the City's plan is actually proposed on my property. In a neighborhood with few children, a large park will not bring families. It will just bring crime, gangs and homeless people. Concentrate on attractive smaller green areas within the area. The current head start school is a far better choice, since it is flat, can handle court surfaces and is an underutilized government property. It will be less expensive to develop than a hillside with double the land value. I have no intention of selling my commercial site for a park.

Crime has been and continues to be a huge issue in the Mall area. Stop the townhome developments. They are low quality, low density structures and are the tenements of Mid-Tacoma. No one should enter their home via an alley for a front entrance. If the city continues allowing these substandard developments, the crime will never be contained. We need alley ways closed off to thru traffic. We need our streets, especially the arterials as our main traveling roads. If all people, vehicles, etc. are in the open, visibility will deter crime. Remove the hiding areas like the alleys. Do not require walkways and connectivity through the residential developments. Use the perimeter streets and sidewalks. Otherwise you will only increase the crime in the residential communities.

I have concerns about the proposed storm system I agree whole heartedly with utilizing rain and containing water, but I have concerns about how the city implements the program. I have paid handsomely for hooking up to the city's storm system. I cannot reconvert to a contained system on sites that are already developed. It would be far too expensive. I also have sites with internal storm systems. Currently, I have a 100% contained storm system at Tudor Village Apartments on Pine Street. I am being billed as though the water leaves the site, I am not happy about this at all. I have incurred the cost and maintenance for the internal system, yet am also paying full storm fees. I highly doubt this will be well received by property owners once they see the true situation here.

In regards to any and all road improvements planned. Good luck. I will believe it, when I see it. The roads in the Mall area are the utmost embarrassment to the city. The city had personally neglected the area and is a major reason for the poor homeownership in the vicinity. In the thirty-four years of working in the Mall area the city has never paved a street. Never, I have paved more streets in the area than the city has since the roads' inception. I do not believe the drawn plans will ever happen. But, by some remarkable situation, if the city ever addresses the roads give us what we need, main arterials, sidewalks, lighting and most importantly, safety. We cannot walk, drive or ride with dark streets, missing sidewalks, potholes, etc. If you incorporate landscaping make sure it is maintained too. In fact in order to be successful. I suggest you start with the road improvements first. Then we might believe the other improvements could be a reality.

Thank you again for your work on the Mall area.

Kathryn J. Dobler
Broker

From: [Barnett, Elliott](#)
To: [Barnett, Elliott](#)
Subject: FW: PUBLIC REVIEW DRAFT SUBAREA PLAN AVAILABLE
Date: Thursday, September 14, 2017 2:59:12 PM

From: Engel, Dennis [mailto:EngelD@wsdot.wa.gov]
Sent: Monday, September 11, 2017 11:52 AM
To: Barnett, Elliott
Cc: Alam, Nazmul; Suttmiller, Forest
Subject: RE: PUBLIC REVIEW DRAFT SUBAREA PLAN AVAILABLE

Here is WSDOT Olympic Region Planning's comments on the Subarea Plan, the EIS will be sent separately.

- Page T-27 project 2 – The title says “I-5 Direct Access/HOV Ramp-Phase 1”, this is the first I have seen HOV. I suggest dropping the HOV from the title and description. During the study, we could look at HOV as an option, but that is not something in the previous study.
- Page T-34 I-5 Direct Access Ramp, first paragraph – plan says “through a formal scoping and project development process with WSDOT”, this should say “through a Feasibility Study process with WSDOT”. The original study was a Feasibility Study in 2001. We currently have funding to redo this study.
- Page T-34 I-5 Direct Access Ramp, last paragraph – says “initial design and permitting studies (known as an Interchange Justification Report)”. I am assuming this project is the Feasibility Study, we are not doing the Interchange Justification Report with the current funding. The Interchange Justification Report would be the next step before right-of-way and design phases.

Please let me know if you have any questions or want to discuss these comments.

From: Engel, Dennis [mailto:EngelD@wsdot.wa.gov]
Sent: Monday, September 11, 2017 2:58 PM
To: Barnett, Elliott
Cc: Alam, Nazmul; Sutmiller, Forest; Liufau, Yvette
Subject: Tacoma Mall Subarea Plan DEIS

Here are comments from the WSDOT Olympic Region Planning on the Draft Environmental Impact Statement:

- Page P-26, 2nd paragraph, 2nd bullet – suggest removing “HOV” from the proposed project. This has not been an HOV access in the past, the HOV part could be looked at during the current study.
- Page T-37 Figure 3.6.7 Study Intersections – Not sure why the SB I-5 off and on ramp intersection with 38th street was not studied, but yet the intersection on the east side of the freeway is included in the analysis for existing and future LOS impacts.
- Page T-30 Figure 3.6.10 Collisions and T-31 Figure 3.6.11 Pedestrian + Bicycle Collisions – use Section 409 disclaimer –

Under 23 U.S. Code § 409 and 23 U.S. Code § 148, safety data, reports, surveys, schedules, lists compiled or collected for the purpose of identifying, evaluating, or planning the safety enhancement of potential crash sites, hazardous roadway conditions, or railway-highway crossings are not subject to discovery or admitted into evidence in a Federal or State court proceeding or considered for other purposes in any action for damages arising from any occurrence at a location mentioned or addressed in such reports, surveys, schedules, lists, or data.

- Page T-35 Appendix B, project 2 Description – change to “Feasibility study for new direct access freeway off ramp”
- Page T-35 Appendix B project 6 – I assume this is related to project 2, Suggest add This will implement results from Project 2. I would also remove the statement “It will directly connect to a new or relocated multi-modal transit center.” The location of the new transit center is not confirmed, I thought one option is over on Pine, this ramp would not connect to Pine St.

Thank you for the opportunity to comment on this DEIS, if you have any questions or need clarification on any of these please let me know.

Dennis Engel, P.E.
Olympic Region Planning Manager
Wellness Coordinator
(360) 357-2651
(253) 381-2673 Cell

From: hansenjsdl@aol.com [mailto:hansendljs@aol.com]
Sent: Monday, August 21, 2017 10:38 AM
To: Tacoma Mall Neighborhood Subarea Plan project
Subject: concern for development of master plan

Hi Elliott Barnett, the total plan for the neighborhood limits of this project looks good (actually great). However, those of us in the southwest quadrant of the study area are not receiving any benefit from this master plan. More specifically, Puget Sound Street looks like a rural road (and a rough one at that) rather than a city street. I own 4 houses and a 6 plex from 4334 to 4350 South Puget Sound and the street in front of these properties is a disgrace. Attached are some photos of this roadway. I also own Cascade Park Gardens, an 85 bed memory care assisted living facility around the corner at 4347 South Union Ave.

There was discussion of an improvement LID for sharing costs with the city along South Puget Sound Street several years ago that was disbanded after the city funding was not available. Additionally, there are many children living in this area that have no place to play except in the street (and they do). This is an area hit by crime in various forms, including gun shots, fires, vandalism, robberies, drug dealing, and domestic violence. Providing streets with sidewalks, curbs and gutters, and playgrounds in this area won't solve all the problems but it will go a long way in making this a better neighborhood in keeping with the intent of this planning program. How about extending the bicycle path discussed to include South Puget Sound Street.

I will be out of town on September 6 so cannot be at the public hearing. I request that the information herein be included.

Thank you for your consideration.

Donald L Hansen 4339 South Union Ave. Tacoma WA 98409







September 14, 2017

Dear City of Tacoma,

Thank you for the opportunity to comment on the draft of the Tacoma Mall Subarea Plan. The Puyallup Watershed Active Transportation Community of Interest is a community-based coalition working to build access to safe, healthy, and affordable active transportation options for all. We see the Tacoma Mall neighborhood as a critical gap in our community's active transportation network and hope that the Tacoma Mall Subarea Plan will help ensure that everyone who lives, learns, works, and plays in the Tacoma Mall neighborhood can safely travel through and within the neighborhood –whether they are on foot, on a bike or skateboard, or in a car or bus.

We are very impressed with the strong vision set forth for the Tacoma Mall Subarea in this plan and commend staff for their work in crafting it. We are in support of many pieces of this plan and would like to highlight specific strengths below.

Complete Streets Approach

The Tacoma Mall neighborhood presents a significant barrier for people travelling on foot or by bike. Whether they are headed to destinations within the neighborhood or it's on their route to other parts of the City, this area is consistently cited as significant area of concern. We are in support of taking a Complete Streets approach as existing streets are maintained and redesigned and when new streets are built, including the new multi-modal inner Loop Road. Designing and constructing Complete Streets will significantly increase walking and bicycling access within this neighborhood and to the larger transportation network.

Connect the Street Network

The current conditions, with large blocks that lack public through access, inhibit people's ability and desire to walk, bicycle, and skate for transportation purposes. These large blocks also exacerbate congestion on the few arterials that span this neighborhood, which creates more hazardous conditions for vulnerable road users. New connections are essential for the development of a multi-modal, layered transportation system. We support the creation of a new Connectivity Requirement to extend and enhance the existing grid network by creating smaller, more walkable blocks to provide easier access to various destinations.

Transportation Mode Shift to Walking, Bicycling, and Transit

This plan sets forth specific and formidable goals for shifting the mode split away from single occupancy vehicle trips to more sustainable modes. Enhancements such as investing in the pedestrian and bicycle networks, encouraging the expansion of transit and transit oriented development and implementing parking management strategies will have a significant impact on how Tacoma Mall Subarea residents and visitors will navigate these streets.

Identify Dedicated Funding

We are pleased to see a number of potential opportunities to dedicate funding to build the ambitious list of projects stated in this plan. We encourage the City to begin to explore opportunities to build dedicated funding sources and engage with partners to begin designing and constructing this vision.

Thank you for the opportunity to comment on this draft plan. This plan takes a multi-faceted approach to mapping out what it will take to build a vibrant, livable and diverse space! We look forward to seeing this plan progress.

Sincerely,

Liz Kaster

Active Transportation COI Manager
Puyallup Watershed Initiative
www.pwi.org/activetransportation
Safe, healthy & affordable active transportation for all

From: writeeveryday@comcast.net
To: [Tacoma Mall Neighborhood Subarea Plan project](#)
Subject: New Form Entry: Comment form- Participate Page
Date: Wednesday, September 06, 2017 6:53:06 AM

You've just received a new submission to your [Comment form- Participate Page](#).

Submitted Information:

Name

kathy Kelly

Email

writeeveryday@comcast.net

Comment

1. Please, consider aesthetics. Make it a beautiful area where a citizen will feel good when they go there.
Since it is a busy shopping area. As it is now, there is stress and tension as the traffic congestion during holiday shopping, where it could possibly be a peaceful enjoyable experience at beautiful times of the year.
2. I would like to see more vegetarian restaruants.
Thank you, and good luck with the project.

September 13, 2017

Elliott Barnett, Associate Planner
City of Tacoma
747 Market Street, Room 345
Tacoma, Washington 98402
tacmallneighborhood@cityoftacoma.org

Re: Draft Tacoma Mall Subarea Plan

Dear Mr. Barnett:

Thank you for the opportunity to comment on the Draft Tacoma Mall Neighborhood Subarea Plan. Puget Sound Energy (PSE) has been a fixture in the Tacoma Mall Subarea for 54 years. Our offices at 3130 S. 38th Street opened in 1963 and serve residents and community businesses, as well as provide a local employment base. The PSE property is made up of several parcels totaling approximately 7.28 acres bounded by SE 38th Street to the north, S. Lawrence Street to the west, S. 40th Street to the south, and S. Cedar Street to the east (See Attachment).

The Tacoma Mall Neighborhood Subarea Plan provides a vision for the subarea as a place for people to live, work and shop. As a public service provider, our business does not fit neatly into most long-range plans or land use code provisions, but provides an important benefit and service to the community. PSE's desire is to remain in our current location for years to come and continue to serve the Tacoma community. We appreciate efforts by the City of Tacoma to foster the need to accommodate service providers such as PSE.

Based on PSE's review of the Draft Tacoma Mall Neighborhood Subarea Plan, we have the following comments:

1. Figure LU-1: *Existing land uses in the Tacoma Mall Neighborhood* identifies the PSE property use as Warehousing. There are multiple uses on the property that comprise the utility service. These include: office, warehouse, communications, and service yard. These uses are interconnected and function together as one property. The use charts in 13.06.300D classify the office uses on the property as Permitted and the warehouse uses as Conditional Uses. PSE requests that all uses on the property be classified as Permitted.
2. Per Figure LU-6: *Proposed Zoning*, the subarea proposal includes split zoning the existing PSE property, with the northern half zoned as UCX 75-120 and the

southern half zoned as UCX Transition 65-85. PSE supports the desire to provide transition in terms of height variations as long as the uses on the property continue to be regulated collectively as if the site was zoned the same.

3. Proposed code section 13.12.090 addresses large parcel connectivity plans. This requirement applies to development sites at least one acre in size which are located within a block that is 8 acres or larger in size. The block in which the PSE property is located is over 8 acres in size, so this provision would apply to the PSE property if the thresholds in subsection C are met.

The code section does not address application of the connectivity plan requirement in cases where there is multiple property ownership within the block. If the retail property on the corner of S. 38th Street and S. Cedar Street (parcel # 9710001651) meets the redevelopment thresholds for the connectivity plan, is connectivity now required through the PSE property, which makes up the remainder of the block? Due to the nature of the PSE service use, maintaining secure access and limiting public entrance on the property is a necessity.

4. Similar to the comment above, the proposed revisions to code section 13.06.512 would require additional pedestrian walkways if an addition or alteration exceeding 15 percent of the value of the existing development were proposed. Public access is provided to the front of the office building, as this is where the public service function of the site is located. However, additional access to other areas of the site by the public is not warranted and violates security requirements of PSE facilities. Particularly access required to attract the public with amenities such as lighting, street furniture, and landscaping.
5. As shown in Subarea Plan Figure T-3. *Subarea Complete Streets typologies*, S. Lawrence Street is designated as a Signature Street: Loop Road and S. 40th Street is designated as an Urban Residential/Green Road. It is not clear by information and cross sections provided whether these street typologies require additional right-of-way or will have impacts on adjacent properties.

Thank you for your consideration of these comments. Should you have questions or would like to discuss these comments or other aspects of the Subarea Plan further, please feel free to contact me at 425-462-3821 or kerry.kriner@pse.com.

Sincerely,



Kerry Kriner, AICP
Senior Land Planner



Puget Sound Energy Tacoma Mall Neighborhood Subarea Properties



From: [Evelyn Lopez](#)
To: [Barnett, Elliott](#)
Subject: Tacoma Mall Sub-Area Plan
Date: Wednesday, September 13, 2017 11:31:35 AM

Good morning! I wanted to provide some comments on the proposed sub-area plan for the Tacoma Mall Neighborhood. Thank you for your attention to this section of our city.

I don't live in this neighborhood, but I had the opportunity to walk around with Beverly Bowen-Bennett and to doorbell the area when I was running for Mayor. I was surprised at how few amenities were available--especially open space for the children. Frankly, the area will become blighted if there are not some changes.

It should be no surprise that areas planned for density and for affordability attract young families, but there appear to be no provisions made for the children of these families. Even their local schools are across the freeway and some distance away. The logical open space and potential play area is Madison School. I would strongly urge the City to work with TPS to make grassy areas and the playground available now, and to eventually work with Metro Parks to develop a park and play area there.

In addition, I suggest the City consider changing some of the streets in the residential area to one-way streets. Many residents only have a single garage, and therefore park a second car in the driveway or street. That makes the streets very crowded, and unsightly. One-way streets might allow for more flow through the area, and might look better.

Anything the City can do--resurface the most damaged streets, clean up the alleys--will help make the residents feel more positive about their neighborhood, and may help install more pride in the area. From there you may see gardens started and lawns cared for--if there is a start toward something more attractive. And I wholeheartedly support not having front doors on alleys--we can do better.

Thank you for working on this project. I hope you can move the area in a positive direction, and make the neighborhood more nurturing for the children and adults who live there.

Regards,

Evelyn Fielding Lopez

From: [Barnett, Elliott](#)
To: [Barnett, Elliott](#)
Subject: RE: Brekke Position 9.15.17.docx
Date: Thursday, September 14, 2017 2:50:20 PM

From: J.J. McCament [mailto:JJ@mccamentandrogers.com]
Sent: Wednesday, September 13, 2017 11:28 AM
To: Barnett, Elliott
Cc: 'John Brekke (john@brekkeproperties.com)'; eleanor@brekkeproperties.com
Subject: RE: Brekke Position 9.15.17.docx

Thank you, Elliott. The process is really complex and quite onerous. A recorded legal document and going back through the same approval process if the connectivity plan needs to be changed adds so much time and money. Designing a connectivity plan at the time of major redevelopment allows the property owner to design connections in context with the new development rather than guessing at what might be best, where buildings will be located, footprints, etc. To design a site plan with the constraints of a pre-determined connectivity plan seems to be the tail wagging the dog. At least from a developer/private property owner's point of view.

From: [J.J. McCament](#)
To: [Barnett, Elliott](#)
Subject: Public Comment - Tacoma Mall Subarea Plan
Date: Friday, September 15, 2017 12:06:01 PM

Good morning, Elliott:

I have one burning issue that I would like to raise in the discussion concerning the Tacoma Mall Subarea Plan – the future presence of the United States Postal Service (USPS) in the Tacoma Mall Neighborhood. It would be short-sighted to displace significant postal facilities in order to achieve other goals in the Tacoma Mall Subarea Plan, such as the relocation of the Pierce Transit Center. I am not against the relocation of the transit center; I support a relocation that would improve connectivity to local and regional destinations for residents, employees, shoppers, and commuters. I simply feel there are benefits to the presence of the post office that haven't been brought forward. For example:

1. Retail is changing and more goods are being delivered via postal services, both public and private.
2. Businesses that ship goods consider a nearby postal facility a competitive advantage in the race to meet customer demand and exceed customer expectations.
3. The presence of USPS in close proximity to catalyst sites identified in the Subarea Plan is a plus.
4. Site location checklists are routinely used in the recruitment of new businesses by economic development organizations. Proximity to shipping and receiving facilities such as the U.S. Post Office, UPS, Fed Ex, and other carriers is important to businesses when they are considering where to expand operations, start a company, or relocate their offices and headquarters.
5. When the postal service consolidated facilities a number of years ago, some communities, notably our state capital, lost their postmark. Tacoma's postmark is now stamped on all the regional mail that goes through the facility. Personally, I think that is a benefit of tremendous value to our community and our economic development efforts.
6. The relatively large properties owned by the post office provides flexibility for future modes of package delivery. One local architect recently came up with an exciting concept that incorporated drive-through stations for package pick-up and returns.

If and when USPS decides they want to vacate their present facilities, the city will mount a campaign to keep them in our community. Let's embrace them now and consider USPS the valuable partner they are in supporting local businesses and providing services to residents.

J.J.
253-219-7962

P.S. Neither I nor anyone from my family has ever worked for the U.S. Postal Service!

From: [McDaniel, Christine](#)
To: [Barnett, Elliott](#)
Cc: [Antonakos, Jetta](#)
Subject: Tacoma Mall Subarea Plan
Date: Thursday, September 14, 2017 1:04:27 PM
Attachments: [image001.jpg](#)

Hi Elliott,

Thanks for chatting with me today. As you already worked with Gary Kato, I hesitate to recommend big changes to the plan, but it seems fair to mention recycling along with waste disposal as a consideration. As you mentioned, it fits in with the overall goals of the city as a leader in Sustainability. Here are the comments I prepared a couple of weeks ago, followed by some additional thoughts.

In my review of the Tacoma Mall Neighborhood Subarea plan, I saw mention of several aspects of care for the environment and the quality of life of the people who live in work in the neighborhood, but little to no mention of opportunities or infrastructure for recycling.

For example, Chapter 7, Environment, deals with storm water runoff, tree canopy, and “regional conservation of farms and forests”, with no mention of recycling opportunities. Chapter 8, community vitality, sets Action CV-3, “Rebrand the neighborhood as a “green neighborhood,” celebrating planned improvements in green storm water infrastructure, parks, and tree cover.” Chapter 10, Utilities and Services, Goal US-1 States, “Ensure availability of utilities at appropriate levels of service to support the Neighborhood’s existing and planned development.” Goal US-2: “Minimize impacts...associated with the siting, development and operation of utility services and facilities.” Action US-4: “Revise development regulations to require two-family, three-family, and townhouse developments to provide a consolidated location for storage of solid waste containers, direct street access pickup, and if needed space for a shared waste collection service.”

I believe that as part of a vital neighborhood, especially one branded as a “green” neighborhood, infrastructure improvements should consider access to recycling as a part of new development plans. There are several places in the report that could include mention of access to recycling by residents, especially those of multifamily units.

It is possible that recycling and food/yard waste is considered a part of “utility services,” and “solid waste,” and thus was not forgotten or ignored. It is true that recycling and food/yard waste is not required, so it may have been overlooked. It would be great if all future construction was at least planned with the possibility of recycling in mind.

I also wonder, regarding the wording of the plan, why the phrase “two-family, three-family, and townhouse developments” is used without mention of Multi-family residences. The phrase “multi-family residence” would encompass three family, townhouse developments, apartments, and assisted living facilities (and perhaps others that I forgot.)

Happy to chat with you further, if you wish.

Regards,

Christy McDaniel

Coordinator, Multi-Family Study Project

City of Tacoma Environmental Services

Phone (253) 594-7869

cid:image003.jpg@01CF5890.C60DECD0



From: [Kristen McIvor](#)
To: [Tacoma Mall Neighborhood Subarea Plan project](#)
Subject: Tacoma Mall Neighborhood Subarea Plan
Date: Friday, September 15, 2017 9:48:29 AM

Comments on the subarea plan for the Tacoma Mall area:

I was happy to see so many different aspects of quality of life taken into account – and I have several concerns:

Goal H-2: I see that there are some percentages for the target amount of low-income housing, and that is great – but I wonder how those compare to the incomes of current residents (i.e. are there currently less than 25% of residents low income and less than 12.5% very low income?) Are the proposed percentages sufficient so that there will not be displacement of current residents? These types of plans always speed up gentrification, of large concern to many in Tacoma, so I am just questioning whether the current proposed amount of low-income housing will mitigate those concerns. I see there is the intention to work with housing partners (Action H-8) but since there are no numbers there it is hard to see if that is sufficient to keep people in their homes.

Goal CV-3: I also see that there is a plan for increased development and new businesses in the area – is there a plan to prioritize locally-owned businesses vs. national chains so that the neighborhood can continue to reflect the interests/ambitions of residents vs. which corporations are interested in this demographic?

Goal CV-1: I have heard many times of efforts like this that ‘renovate’ neighborhoods and then give them a new name being compared to colonization – I think it’s worth examining and working to ensure that the name that is chosen is actually a name that comes from the existing community, rather than one that would be attractive to others looking to come into a community like this will be after all this work – It’s always important to ensure that the process has authentic community engagement (it looks like you have attempted that, it’s hard to know who actually showed up and how representative they were of the neighborhood), and the naming process is important.

Goal CV-8: I see that affordable food sources are top priorities for the community – we have been working on a parallel research project with the community in S. Tacoma focused on this and should have results and an action plan by mid-2018 – there may be opportunities for partnerships there.

Thanks for all the work to put together such a comprehensive plan and for the opportunity to provide comments!



950 Pacific Avenue, Suite 410
Tacoma, WA 98402

253.383.4726
edbTacomaPierce.org

September 15, 2017

Elliott Barnett
Associate Planner, City of Tacoma
Tacoma Municipal Building
Third Floor
747 Market Street
Tacoma, WA 98402



RE: Tacoma Mall Subarea Draft Plan

Dear Mr. Elliott Barnett:

We appreciate the dedicated effort led by the City of Tacoma to organize a draft plan that will lay the framework in positioning the Tacoma Mall area as a regional retail destination and an economic driver while balancing the needs of our residents, existing and future businesses, and the community.

I'm excited to see the future potential realized for an area that previously lacked amenities and disinvestments and what this revitalization would bring to our local economy. Managing growth and fostering a thriving, attractive mixed-use urban center with a unique identity will create a setting where people want to live, raise a family, work, and play – all critical elements in economic development. Although some details still need to be worked out such as an amicable solution for the proposed 37th Street which would intersect through Michael's and Cedar's Plaza, it is still a robust and strategic plan.

I was pleased to note that the proposed plan was comprehensive and inclusive in its forward-thinking approach to addressing the issues within the neighborhood. Including, social inequity; quality housing; lack of parks and green spaces; loss of a former elementary school site; connectivity of streets; public transit options; pedestrian, bike and vehicle access; green infrastructure improvements; and retention and attraction of businesses and jobs.

All of these elements and more will help further strengthen the case for why Tacoma-Pierce County.

We appreciate your consideration.

Sincerely,

Maddie Merton
Vice President, Business Retention & Expansion

From: [VALERIE MUNOZ](#)
To: [Barnett, Elliott](#)
Subject: TACOMA MALL SUBAREA- COMMENTS
Date: Friday, September 15, 2017 3:17:24 PM

Dear Elliott, Planning Commissioners, and City Council,

I'm Valerie Fyalka-Munoz. It has been wonderful working with all of you. I have been in Real Estate in the Tacoma Area for over 40 yrs. I'm from Tacoma. I help manage Michael's Plaza at 2921 S 38th. I have been going to these meetings for over 18 mos.

The Tacoma Mall Neighborhood Plan places an excessive burden, and encumbers Michael's Plaza with new roads on the Medium term and long term Vision maps. The roads and 37th street will Restrict Business, Devalue the property and Restrict the ability for future Development. The Topography has a difficult 20 ft Slope coming off of Pine Street. The cost to construct a road will be a very costly endeavor and will restrict the property.

Presently Michael's Plaza has 8 entrances for ingress and egress. The City Planners would be wiser to develop and improve the existing road system and right of way's and not encumber and Burden the Commercial Property Owners with 37th and other Roads.

THE TACOMA MALL NEIGHBORHOOD PLAN IS AN EXCESSIVE TAKING OF PROPERTY RIGHTS. THE PLAN IS UNCONSTITUTIONAL.

THE NEXUS AND PROPORTIONALITY IS UNREASONABLE.

WE ARE GOING TO DEFEND OUR CONSTITUTIONAL RIGHTS AND WILL HAVE TO LET THE COURTS DECIDE.

It's always a Pleasure doing business with the City of Tacoma.

Thank you,

Valerie Fyalka- Munoz

September 15, 2017

Elliott Barnett, Planner
City of Tacoma
Development Services/Land Use
Tacoma, WA 98402-3701

Dear Mr. Barnett:

Per your request, Pierce Transit is respectfully submitting the following comments and suggested revisions on the Tacoma Mall Neighborhood Subarea Plan Draft Environmental Impact Statement (EIS). All are found in Chapter 6 – Transportation.

Page T-17, Table T-1. MODE SHARE: Please cite the source of the data.

Page T-17, TRANSIT & TRANSIT-ORIENTED DEVELOPMENT: While we agree that the City should proactively “look ahead to potential rail and high-capacity transit (HCT) investments,” we would suggest some additional language that points out the fact that the Tacoma Mall area was not identified in the Sound Transit3 (ST3) System Plan as a connection point. Nor was it identified for potential HCT in our agency’s Long Range Plan, *Destination 2040*, as adopted in April 2016. We are, however, in the initial stages of exploring either HCT or an Enhanced Bus route along South Tacoma Way from downtown Tacoma to Lakewood with a connection to the Tacoma Mall, but that vision (non-funded) project would first need to be approved by the Puget Sound Regional Council and added as part of the update to their Long Range Plan, *Transportation 2040*, in 2018.

Page T-18, First paragraph: Refers to Figure T-5 when we believe you meant to reference Figure T-10 on Page T-19.

Page T-18, Action T-9: Capitalize *Tacoma Mall Transit Center* for consistency throughout the document.

Page T-18, Action T-11: While Pierce Transit would certainly consider relocating the Tacoma Mall Transit Center to provide 360-degree access and stimulate mixed use, transit-oriented infill development, we feel some additional language is needed to clarify that a feasibility study for a potential relocation and reconfiguration of the existing Transit Center is required first. The way it is written in the draft document currently, it assumes a relocation of the Transit Center has already been decided and a new location determined. Also note that it is listed as “the existing Tacoma Mall Transit Station,” when it is actually a transit *center*.

Page T-19, Figure T-10: We feel a caveat footnote is needed to explain that the proposed *Transit Center Potential Site(s)* as depicted in the diagram is conceptual or illustrative only. In addition, the actual location of a new, multi-modal Tacoma Mall Transit Center would need to be determined by the outcome and final recommendation of the study, as mentioned above. It would also help the reader by indicating the location of the existing transit center on S. 48th Street for reference.

Page T-25, Action T-25: Pierce Transit would suggest specifically naming the “transit agencies and other partners” you would coordinate with to ultimately bring HCT to the Tacoma Mall area.

Page T-27, Table T-2. Project List: Project number 6 lists “in conjunction with ST3 high-capacity transit study.” Has Sound Transit already agreed to participate in the Preliminary Engineering/Design phase (Phase 1) for a new Transit Center? If so, this is certainly news to Pierce Transit.

Page T-27, Table T-2. Project List: Project number 8 lists the new Transit Center with a capital cost of \$28 million. We are wondering where that cost estimate came from, as well as the project description?

Page T-36, TRANSIT INVESTMENTS: This is the first place in the chapter where it calls out the need for a feasibility study to determine the new location and type of Transit Center that could potentially serve both HCT and Regional Express service. We would suggest that this language is moved to the beginning of the chapter and reiterated throughout.

Page T-36 and T-37, FUNDING SOURCES: In the first paragraph where you indicate “Additional strategic funding partnerships with other agencies like...Pierce Transit are critical to implementing projects identified in this plan.” Although we agree with this statement, we would like to emphasize that there is no funding in our Six-Year Capital Plan identified for any of the five transit-specific projects (Numbers 6 thru 10) estimated at a combined \$59 million from the list on page T-27.

In closing, please note that Pierce Transit is grateful to the City of Tacoma’s Development Services/Land Use Division for affording us the opportunity to help reshape this regional growth center from an outdated, suburban, and automobile-dominated area to a thriving, mixed use and multi-modal activity center. These proposed changes can only help to increase both local and regional transit ridership. Pierce Transit is looking forward to further participating in this transformative project and partnering with the City however we can, up to its eventual implementation.

Sincerely,

Darin L. Stavish, AICP
Principal Planner

cc: Jay Peterson, Transit Development Manager
Peter Stackpole, Service Planning Assistant Manager
Max Henkle, Senior Planner
Eric Chipps, Senior Transportation Planner – Sound Transit

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

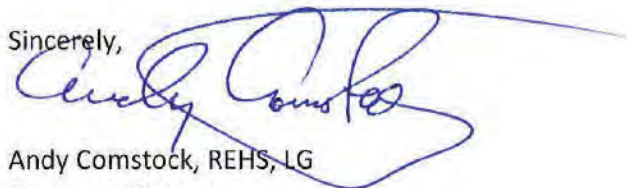
Mr. Barnett,

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

G:\LIBSHARE\SRCPRO\Business Pollution Prevention\STGPD\Corresp\2017\STGPD TMC 13.09 Revisions.docx

3629 South D Street | Tacoma, WA 98418-6813 | tpchd.org | (253) 798-6500 | (800) 992-2456 | TDD (253) 798-6050

TACOMA Anthony N. Chen, MD, MPH, Director of Health EIS, printed on recycled paper



City of Tacoma
Transportation Commission

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.

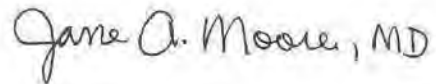
The Transportation Commission finds that the Tacoma Mall Subarea Plan is a great visioning plan. As a whole, it is consistent with the Transportation Master Plan (TMP) goals of developing partnerships, protecting natural assets, providing mobility for all, and reinforcing Tacoma's land use vision. It 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



City of Tacoma
Planning and Development Services Department
747 Market Street, Room 345
Tacoma, WA 98402
Attention: Project Manager Elliott Barnett

Official Comment: Tacoma Mall Neighborhood Subarea Plan and Environmental Impact Statement

Metro Parks Tacoma (MTP) is in receipt of the Notice of Availability related to this project and specifically, the Draft Environmental Impact Statement (DEIS.) It has been a pleasure for MTP to participate in this subarea process and to be apprised of the various project milestones.

Growth target areas like the Tacoma Mall neighborhood particularly require thoughtful planning and consideration of all stakeholders, including MTP. The meetings and discussions have been valuable and informative, particularly in considering the potential unique park needs and service implications of an area expecting more urbanization. The resulting inspirational community vision confirms and further promotes the importance of parks and open spaces for this area's future. It is appropriate to forward this subarea plan as an amendment to Tacoma's Comprehensive Plan, along with policy that may encourage park service levels for special areas like this where urban densities are expected.

MTP is concerned, however, by the proposed action alternative aspect of the plan, due to the inconsistency with adopted public plans for park service levels. Current park service levels, set by MTP and incorporated into the City of Tacoma Comprehensive Plan, reflect data-driven system-wide understandings and expectations currently accepted by the wider community. While envisioning walkable parks within future sub-districts of the area is commendable, it does not yet have the support of wider constituencies which is critical for long-term success, to include potential public maintenance and operations. The Metropolitan Park District of Tacoma, for example, does not currently utilize sub-areas in defining the public park service levels. Next year, MPT will be updating the level of service standards which are part of our strategic plan. This will provide a near-term opportunity to discuss and further evaluate standards for dense urban parks within a system-wide context.

While the plans indicate that the implementation of park, green space, and urban trees may be by private parties, presenting it as a proposed action alternative in the DEIS complicates public acceptance at this time. For example, impacted jurisdictions and tax payers may be confounded by inconsistent service standards but, due to the programmed action nature of this proposal, may not have SEPA review opportunities to address concerns and impacts. Sub-area planning and laudable visioning exercises regularly encounter these kind of implementation challenges given the requirement for consistency among congruent public plans. The visionary aspect of the plan, however, is critical for instructing potential new policy and standards. For example, MTP regularly examines its strategic plans and operations to align with community vision statements as much as possible, with a current GMA-

compliant Strategic Plan Update process underway now. Ultimately, MPT shares the goal with the City of Tacoma to maintain an updated comprehensive plan that enables consistent implementation.

In conclusion, MPT recommends that the Tacoma Mall Neighborhood Subarea plan be considered in future Comprehensive Plan amendment cycles which will ensure consistency across jurisdictions. If the alternative action is advanced as programmed action, MPT requests that the record explicitly state the following:

- MPT acknowledges the suggested 5-10 minute walkability standard from a park or open space as an aspirational goal within this dense urban environment.
- MPT will be considering the addition and development of new level-of-service standards through its upcoming strategic planning process and LOS analysis. These could include standards for dense urban neighborhoods, which are not explicitly addressed in current level of service standards.
- Any discussion of new LOS standards must consider future impacts on maintenance and operations. Those impacts have not been addressed in this analysis.
- MPT is committed to working with the City, the School District and the community to address these issues.

Please contact Ms. Debbie Terwilleger at (253) 305-1086 regarding this official Metro Parks Tacoma comment.

From: toweywf10@gmail.com
To: [Tacoma Mall Neighborhood Subarea Plan project](#)
Subject: New Form Entry: Comment form- Participate Page
Date: Thursday, September 14, 2017 1:33:38 PM

You've just received a new submission to your [Comment form- Participate Page](#).

Submitted Information:

Name

William Towey

Email

toweywf10@gmail.com

Comment

Affordable housing should be provided so that 15% of total mall area housing stock is available at 50% AMI.

September 11, 2017

Planning Commission
City of Tacoma
747 Market Street, Room 345
Tacoma, WA 98402

Re: Tacoma Mall Neighborhood Plan—Tacoma-Pierce County Health Department Comments

Dear Planning Commissioners:

Thank you for collaborating with the Health Department to develop this important sub-area plan. Tacoma Mall Neighborhood is home to a diverse, highly transient, and low-income population. Typically, residents experience worse health outcomes and shorter life expectancy than in other areas of Tacoma.

Last year, the Board of Health adopted a [Health-in-all-Policies Resolution](#) that encourages local jurisdictions to consider health in all decisions. The sub-area plan demonstrates this approach. We have partnered with the City of Tacoma and other stakeholders over the past 30 months to infuse health into each decision-making step. We engaged diverse populations through non-traditional methods to understand their livability needs and to support policies to improve the community.

Many approaches proposed in this plan would help to achieve more walkable neighborhoods, including:

- A playable loop road.
- The Madison school and community hub.
- Tree canopy and green infrastructure, etc.

To address involuntary displacement, we empowered local residents to champion the implementation of the plan, while welcoming new comers to join build a healthy neighborhood. Maintaining the current level of affordable housing units in this neighborhood is crucial.

The neighborhood affordability target performance measures in the Housing Chapter are too low. According to the American Community Survey's five-year estimates (2011-2015), about 90% of the current housing stock is renting less than \$1,250 per month and 25% renting less than \$750. To help minimize the adverse impact of gentrification, we strongly encourage the City to maintain closer to the current percentage of affordable housing within the neighborhood for low and very low-income households, earning 80% and 50% of the Average Median Income respectively.

With the above comments incorporated, I encourage you to recommend this draft plan and draft EIS to the Tacoma City Council for adoption and future implementation. Once implemented, the Tacoma Mall sub-area community will be a healthier community for all who live, learn, work and play there.

Sincerely,



Anthony L-T Chen, MD, MPH
Director of Health

Tacoma Mall Neighborhood Subarea Plan and DEIS
Editorial Comments from Core Staff Committee Member
Amy Pow, Principal Planner
Tacoma-Pierce County Health Department
September 12, 2017

DEIS

Recommend giving this document a good proof-read to ensure:

- All information is complete, particularly references to Figures and Tables.
- Any action numbers referred in this DEIS align well with the final draft plan's.

Some obvious examples include:

- P. H-3: The 2nd sentence in the second paragraph under **Housing Cost** is incomplete.
- P. H-4: The 3rd sentence in the third paragraph under **Affordable Housing** is incomplete.
- P. H-12: Cross-check Action H-9 referred in the 2nd paragraph with the revised Action H-9 in the draft plan to ensure alignment. From a public health perspective, we support the original policy language which calls for "maintaining a no net loss of the current stock of affordable housing". In fact, the City should encourage the rehabilitation of the current stock to ensure that those currently relying on these units would not be displaced.
- Recommend using a smaller font for footnotes on P. T-6, 11 and 12, similar to that of footnote 4 on P. T-20. Ensure consistency throughout.
- P. T-11: Footnote 2 seems incomplete.
- P. PS-26, Figure 3.7.4: Expect some concentric circles or "walkshed" in light green (if network analysis is used) shown on this figure to show where the open space gap is, as mentioned in the text on P. PS-18. The school site should also be shown as "hatched blue" on the map/figure.
- Similarly for Figures 3.7.2 and 3.7.3 on P. PS-24 and PS-25, not all items shown on map legends can be found on the maps/figures. Readers typically read the map in conjunction with the legend.

Draft Plan

- P. 1-8: Add the word "Department" after "Health" in the title.
- P. UF-4, Figure UF-1: Consider adding the subarea plan boundary. It's misleading to show a huge green area south of Madison, as if this subarea plan area has a huge open space.
- P. UF-7 and UF-8: Outline the loop road would be useful. Add map legend to annotate the use of different colors.
- P. UF-13: Check if the Figures numbers (UF-9 through UF-11) in the last paragraph are correct?
- P. UF-14: It would give readers a better orientation if street names are added to those Figures.
- P.LU-5: Would the word "address" be a better choice than "reflect" in the opening sentence of the 2nd paragraph?
- P.H-8, Action H-5: The paragraph under Action H-5 seems out of place.
- P.H-8, Action H-7: See TPCHD Letter to Planning Commission dated September 11, 2017 Re. Comments about "maintaining 25% and 12.5% affordable housing units for the entire neighborhood (vs. solely for new housing development) for low (80% AMI or less) and very low income (50% AMI or less) households respectively are NOT sufficient".

- P. H-9 Performance Measures, last two bullets: See comment above and TPCHD Letter to Planning Commission dated September 11, 2017.
- P.T-7, first paragraph: Recommend changing the last two words from “business health” to “businesses and health”.
- P. T-10, Figure T-3: Add the term “Complete Streets” after “Signature Street” to denote the Loop Road.
- P. CV-12, Action CV-21: Check reference to Photo 8. Where is the photo?
- P. IMPL-4 Side Bar: The last paragraph is incomplete. Recommend replacing the last word “and” with “open their arms to welcome new comers to jointly build a healthy neighborhood”.



Puget Sound Regional Council

September 15, 2017

Elliott Barnett, Associate Planner
City of Tacoma Planning and Development Services Department
747 Market Street, Room 345
Tacoma, WA, 98402

Subject: PSRC comments on draft Tacoma Mall Subarea Plan

Dear Elliott,

Thank you for providing an opportunity for the Puget Sound Regional Council to review the draft subarea plan for the Tacoma Mall regional growth center. We recognize the substantial amount of time and effort invested in this plan and appreciate the planning and stakeholder engagement develop a shared vision for this community.

We would like to note the many outstanding aspects of the draft. Several particularly noteworthy aspects include:

- Goals and actions that emphasize the city's role in accommodating future growth and providing services and amenities to support the Tacoma Mall community.
- Emphasis on environmental stewardship in the center and goals to manage stormwater, reduce emissions, and expand tree canopy coverage for the subarea.
- Provisions to support multimodal transportation choices throughout the center.
- Emphasis on health and well-being throughout the plan, with particular focus on equity, expanding nonmotorized transportation, and addressing safety and community amenities.

The draft Tacoma Mall subarea plan advances regional policy in many important ways. There are a few items that the city should consider before the plan is finalized:

- The draft plan includes growth targets for population and employment. Consistent with the Draft EIS, the plan should also include the target for housing unit growth.
- Consistent with the Regional Center Plan checklist, the transportation chapter discusses future development of a parking strategy. A parking strategy is an important way to address neighborhood access and urban form, and the city should consider including a parking strategy as a stand-alone action item. The city should also consider incorporating this work as an early implementation step. PSRC has resources and tools available to support development of a parking strategy.

Thank you again for working with us through the plan review process. There is strong work in the draft and we are available to continue to provide assistance and additional reviews as the plan moves through the development process. If you have questions or need additional information regarding the review of regional center plans or the certification process, please contact me at 206-464-6174 or LUnderwood-Bultmann@psrc.org.

Sincerely,

Liz Underwood-Bultmann
Senior Planner, Growth Management Planning

September 10, 2017

To: Elliott Barnett, Planning Services Division

I was unable to attend the September 6 meeting, but still would like to comment for the record.

- I believe that all buildings for human habitation should be required to have green space available for its residence. Depending on the size and occupancy of the development a certain amount of green space should be required.
- No front doors facing alleys. It should be required to have all access for residences to be through the front doors. The back doors should be open for green space.
- There should be requirements for a certain amount of housing to be affordable and some senior developments with easy access to the transit system. This can be done through some sort of incentives.
- No buildings should exceed more than six stories and have adequate off street parking to include visitor parking. Depending on the size of the building would determine the amount of parking spaces and visitor parking. Buildings more than six stories should be built downtown.
- It should be required by the developer to pave streets, put in curbs and handicap accessible sidewalks in front of the development to make it a more walkable area.
- As for the environment, it should be required to have all new streets pervious, so water can penetrate into the ground instead of going into the Puget Sound and developers should be required to plant trees, shrubs and other plants because of the air quality during the winter months.

Sincerely,

Heidi White, S Tacoma Resident

Draft Tacoma Mall Neighborhood Subarea
Plan and EIS



Help shape the future of the Tacoma Mall Neighborhood

Please provide your comments on any aspect of the draft Plan, code changes and EIS below:

Average Median Income in
Tacoma is too high - forcing
people to move.
Low Income - affordable housing is
not affordable.
Building design is too high.
Not ~~enough~~ enough Parking
No open space at development
(Yards)

Comments due by September 15, 2017

Return to:

Elliott Barnett
City of Tacoma
747 Market Street, Room 345
Tacoma, WA 98407
tacmallneighborhood@cityoftacoma.org
(253) 591-5389

Draft Tacoma Mall Neighborhood Subarea
Plan and EIS



Help shape the future of the Tacoma Mall Neighborhood

Please provide your comments on any aspect of the draft Plan, code changes and EIS below:

Environmental

Developers need to incorporate
into their designs a H₂O recovery
system for re-use of Brown
Water & collection & use of
Rain Water

Bob Boarder

Comments due by September 15, 2017

Return to:

Elliott Barnett
City of Tacoma
747 Market Street, Room 345
Tacoma, WA 98407
tacmallneighborhood@cityoftacoma.org
(253) 591-5389

Draft Tacoma Mall Neighborhood Subarea
Plan and EIS



Help shape the future of the Tacoma Mall Neighborhood

Please provide your comments on any aspect of the draft Plan, code changes and EIS below:

All utilities lines, communications
cable and piping (H₂O, sewer, gas), to
be under ground - allowing
for growing trees, no damage
of a better community appearance.
- prevents damage (car crash / signage)
of easier to maintain. Can be
accomplished when roads get fixed.

Comments due by September 15, 2017

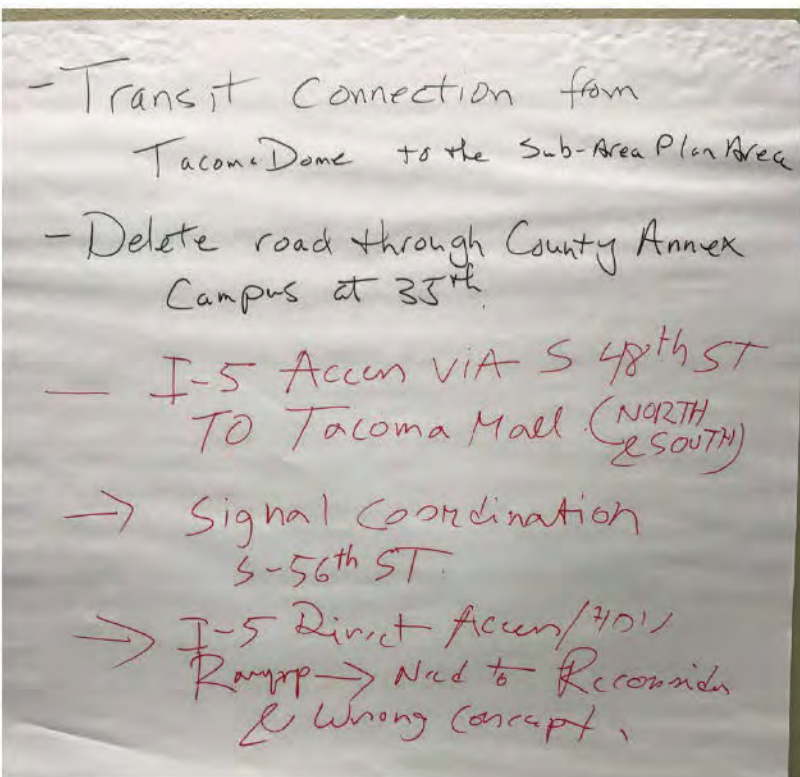
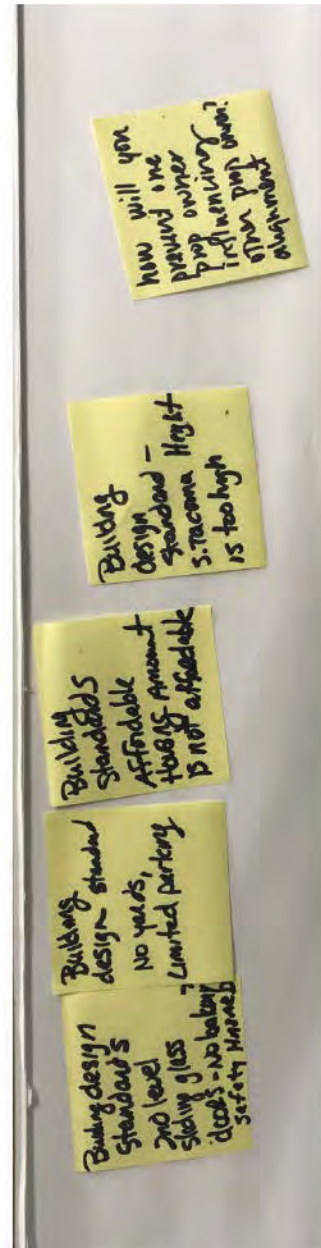
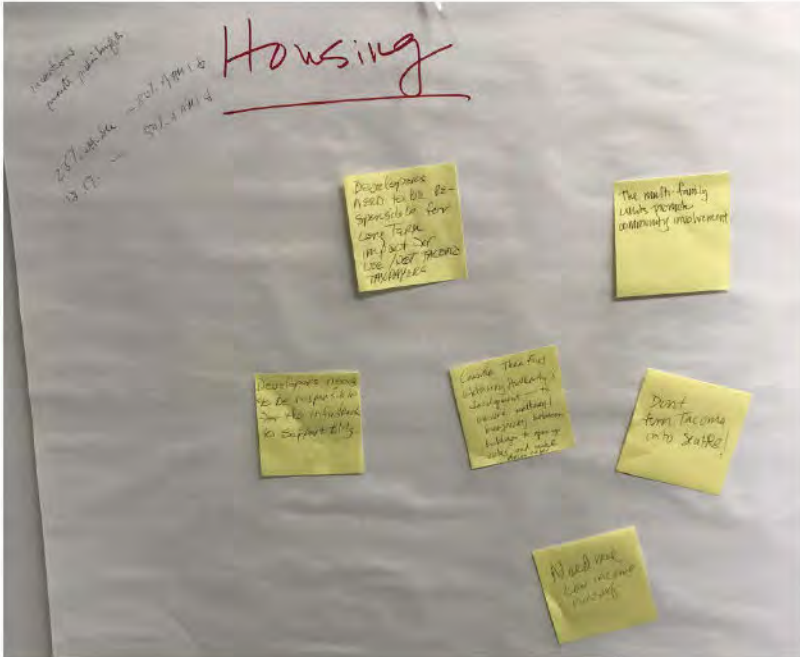
Return to:

Elliott Barnett
City of Tacoma
747 Market Street, Room 345
Tacoma, WA 98407
tacmallneighborhood@cityoftacoma.org
(253) 591-5389

Beo
Barnett

Informational Meeting 08-30-17

Written comments



Dog Park • Forest by Apex

5 Right Sound
Filters
Trees
can over

Where do kids play? •

- developments don't provide ones
- or yards •

566th
- Trees planted
& all died
Tyler says
trees black

Skate Park - at Lincoln Park

Depave & Trees are great
- need to address maintenance!

REQUIRE MORE (OR ONLY) EVERGREEN TREES

CV LOCAL #1) IDENTITY

Identity
NO CONCENS

CV #2) ARTS/CULTURE ↑

MALL
= opportunity
before RETAIL

CV #3) MORE SERVICES CONVENIENCE

No service
commitment
yet.
school district
ignores this.

NOT the
unwanted
North End
services.

CV #4) NEIGHBORHOOD LEADERSHIP on Implementation

Demographic
Challenge
"Transient"
Influence

Home-
owners
= LIMITED
= MIN. input

CV #5) SAFETY ↑

Go after
derelict
owners
more than
banks.
INCENTIVE

CV #6) IMPLEMENT OPEN SPACE/PARKS

ACTIVATE
TRAILS
w/ amenities

Develop
open
space

Transcript of Proceedings

September 6, 2017

In Re Planning Meeting for the Tacoma Mall Neighborhood Subarea Plan



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Seattle/Tacoma, Washington**

CITY OF TACOMA PLANNING COMMISSION

Meeting: Public Hearings)
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VERBATIM RECORD OF PROCEEDINGS

September 6, 2017

Tacoma, Washington

Byers & Anderson, Inc.

Court Reporters/Video/Videoconferencing

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1 APPEARANCES

2

Planning Commission:

3

Stephen Wamback, Chair

4

Anna Petersen, Vice Chair

Carolyn Edmonds

5

Jeff McInnis

Brett Santhuff

6

Andrew Strobel

Dorian Waller

7

Jeremy Woolley

8

Also present: Brian Boudet, Planning Manager

9

Lihuang Wung, Senior Planner

Elliott Barnett, Associate Planner

10

Jeff Lueders, Audiovisual

John Griffith, Admin. Support

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Seattle/Tacoma, Washington**

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NOTE:

The full transcript contains a summary of the entire meeting. It has been edited to remove the pages which do not pertain to the Tacoma Mall Neighborhood Subarea Plan.

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Seattle/Tacoma, Washington**

1 BE IT REMEMBERED that on Wednesday,
2 September 6, 2017, at 4851 South Tacoma Way, Tacoma,
3 Washington, at 5:01 p.m., the following meeting of
4 the City of Tacoma Planning Commission was had, to
5 wit:

6

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9 CHAIR WAMBACK: All right. I will
10 call to order the City of Tacoma Planning Commission
11 meeting for Wednesday, September 6th.

12 First item is the quorum call. Do we have a
13 quorum present?

14 UNIDENTIFIED SPEAKER: Yes, you do.

15 CHAIR WAMBACK: Great. And I am
16 not going to get used to this speaker system. I feel
17 like I'm talking down a well.

18 All right. Item B on our agenda, the approval of
19 the agenda and the minutes. We'll start with the
20 agenda for tonight's meeting. Is there a motion that
21 we approve it?

22 COMMISSION MEMBER: So moved.

23 CHAIR WAMBACK: And it has been
24 moved.

25 COMMISSION MEMBER: Second.

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1 CHAIR WAMBACK: And seconded that
2 we approve tonight's agenda.

3 Is there any discussion on that? All those in
4 favor of approving the agenda say "aye."

5 MULTIPLE COMMISSION MEMBERS: Aye.

6 CHAIR WAMBACK: All those opposed?

7 The agenda is approved.

8 Turning to the minutes. We have two sets of
9 minutes, from the meetings of August 2nd and August
10 16th. And they are separately stapled in our
11 packets. Very long meetings. Where is -- where is
12 John? Thank you, John. Excellent job on the
13 minutes.

14 Do we have a motion before us on them?

15 COMMISSION MEMBER: I move we
16 approve the minutes.

17 COMMISSION MEMBER: I second.

18 CHAIR WAMBACK: It's been moved and
19 seconded that we approve the minutes from August 2nd
20 and August 16th. Is there any discussion?

21 Seeing no indication that anyone wants to
22 discuss, all those in favor say "aye."

23 MULTIPLE COMMISSION MEMBERS: Aye.

24 CHAIR WAMBACK: All those opposed?

25 The minutes from August 2nd and August 16th are

1 Is there anybody else who wishes to testify on
2 the proposed marijuana use buffers code amendment?

3 All right. So I will just remind everybody that
4 we are accepting public written comments on this
5 topic through close of business, 5 p.m., on Monday,
6 September 11th. There are various locations here
7 where you can find where to send those code
8 amendments. And so with that, I will close this
9 public hearing.

10 All right. Item D2 on our agenda is the Tacoma
11 Mall neighborhood subarea plan and environmental
12 impact statement. I get to read this same cheat
13 sheet all over again for this one.

14 So we'll call to order the public hearing on the
15 draft Tacoma Mall neighborhood subarea plan and
16 environmental impact statement. The public hearing
17 is being recorded. Those who wish to testify should
18 sign up on the sign-in sheet at the entrance, the
19 front entrance to the room. The staff report and
20 pertinent materials have been made available for your
21 review there. I had to bring my own backpack for all
22 the materials.

23 Elliott will be providing a brief presentation.
24 Say "hi," Elliott.

25 ELLIOTT BARNETT: Hello, everyone.

1 CHAIR WAMBACK: After Elliott's
2 presentation, I'll call for oral testimony using the
3 signup sheets. Same as we went through for the
4 previous hearing. Testimony will be limited to three
5 minutes apiece. Your testimony can be brief. It's
6 not necessarily to repeat testimony previously given
7 by other people.

8 After the testimony is complete, the public
9 hearing record on this item will remain open to
10 accept written comments until Friday, September 15,
11 2017, at 5 p.m. The Planning Commission will
12 consider all oral and written testimony at subsequent
13 meetings. Elliott will be talking about the
14 schedule. And then we'll be forwarding a
15 recommendation on to the city council. The council
16 may conduct a study session of its own, hold a public
17 hearing, and then make their final decision after
18 that.

19 So I now call on Elliott Barnett to present this
20 topic. Thank you.

21 ELLIOTT BARNETT: Thank you, Chair,
22 Planning Commissioners, and everyone who's come here
23 this very hot afternoon. Thank you very much. I'm
24 really happy to see the room filled with people who
25 are here to comment on and share your insights into

1 this plan for a very important neighborhood of our
2 city. And thanks also to all of the Planning
3 Commissioners for bearing up in this hot weather.

4 I wanted to mention from the very beginning, if
5 you haven't already found the signup sheet over here,
6 this is a good time to go over there and make sure
7 that you get your name on there. That way you'll be
8 called in the order that you signed up. And then at
9 the end, the Chair will make sure that everybody who
10 wants to comment has that opportunity.

11 I'm going to go through a presentation that
12 provides an overview of this full package of
13 materials. And I want to thank those of you who have
14 seen portions of this presentation before for your
15 patience, which is many of you. And I also want to
16 apologize for turning my back towards the audience
17 because of the setup here. So I will do my best.
18 And thank you.

19 So the meeting objective or -- of this public
20 hearing is really to ask -- ask everyone -- excuse
21 me -- is really to ask for everyone's input as we're
22 finalizing a package of plan, code -- plan and code
23 changes as well as an environmental impact statement.
24 Really it's an opportunity to provide your
25 perspective to help shape the future of the Tacoma

1 Mall neighborhood. And so our objective is to hear
2 from all of you who each have a unique perspective
3 and stake in the neighborhood.

4 The Planning Commission is of course listening to
5 this testimony. We are recording it as well, and a
6 transcript will be created. And all this input is
7 going to be invaluable to the Commission, to staff,
8 as we work to finalize this package. It's been a
9 couple of years in the making. And again, thanks to
10 everyone who has contributed to this.

11 In terms of our timeline, we will come back to
12 the Planning Commission at your next two meetings,
13 September the 20th and October the 4th, tentatively.
14 And at those meetings, we will start to go through
15 the public input and comments that we have received
16 and start to flesh out the issues that need further
17 work and analysis and options.

18 At that point, we will tentatively come back in
19 mid October and ask the Commission to make a
20 recommendation on this package to the full city
21 council. At that point, the Commission will be able
22 to step back and the city council will make its
23 decision on the package. So according -- if all goes
24 according to plan, we will have this project wrapped
25 up this calendar year.

1 In terms of what is in this package of proposals,
2 there are three components. And it's worth going
3 through what each one of those is. The draft subarea
4 plan, itself, is a vision, goals, and actions for the
5 neighborhood, going over -- it's got a total of 11
6 chapters, multiple goals. There -- it really sets
7 the vision, sets the policy direction.

8 Proposed for adoption along with the subarea plan
9 are several appendices, a code changes summary and
10 code changes text, as well as some streetscape design
11 guidelines. So with the plan will be a policy
12 adoption as well as zoning design standard and other
13 changes at the same time.

14 Finally, we're also presenting a draft
15 environmental impact statement. What that is, is
16 it's really an in-depth review and analysis of all of
17 the required mitigation steps, all of the actions
18 necessary to make this plan work, to make it work for
19 the neighborhood, to handle the impacts of growth, et
20 cetera.

21 The important thing to know about this draft EIS
22 is that it takes the place of project-level SEPA
23 review, which is currently applicable to larger-scale
24 projects in this neighborhood as well as throughout
25 the city. So it's a way of coordinating that review,

1 coming up with the mitigation actions up front, and
2 then streamlining development that's consistent with
3 that plan.

4 So we are about two years into the process, which
5 has had a very broad community engagement component
6 to it, as well as some very specific technical
7 analysis. So starting about a couple of years ago,
8 we did a major push, similar to what we just got --
9 got finished doing, mailing, e-mail, media, various
10 different -- every way that we could to reach out to
11 the people who live and work and own property in the
12 neighborhood, and did a very intensive push in late
13 2015. Through that, we came up with some themes in
14 terms of what the neighborhood needs to -- to be a
15 place that a lot of people are going to want to be,
16 invest, live, and shop.

17 And some of those key themes were that this is
18 a -- we need to work on a more positive identity, a
19 sense of place here. Needs to be more walkable,
20 bikable, and transit-ready. Parks, open space, and
21 green infrastructure are very much needed here. We
22 need to continue to support economic development and
23 growth here in this area, which is a very important
24 employment base for Tacoma. Safety, both in terms of
25 the neighborhood and in terms of our streets. Access

1 for the people who live here to services, needs,
2 healthy affordable food. Housing affordability and
3 choice, and other elements needed to make this a
4 healthy community. Those are some of the key themes
5 that we started out with, started the process, and
6 became the foundation or the -- or the objectives of
7 the policies that we're bringing forward now.

8 We also have a regional and city policy
9 framework. This is a designated regional growth
10 center, as you know, meaning that this is where, as a
11 region, we have gotten together and said we're going
12 to support jobs and housing growth here with
13 infrastructure investment in order to make that work.
14 So this is something that -- this is a vision that's
15 been in place for over 20 years, and there really has
16 been a lot of growth and change during that period.
17 This is our opportunity to try to shape it and direct
18 it and encourage further growth that's consistent
19 with the community's desires.

20 Perhaps the main theme animating all of our
21 discussions are the desire to shift the character of
22 this neighborhood from its current, more suburban,
23 more auto-oriented structure, to one which is just
24 more focused on people, both in terms of
25 transportation options, in terms of making a place

1 that people actually want to be, place-making,
2 positive identity, and so forth.

3 So we've proposed a -- a pretty ambitious vision
4 for this neighborhood to make it a thriving center of
5 regional significance and a distinctive, connected,
6 livable and healthy place with opportunities for
7 everyone to live, work, invest, and fulfill their
8 potential. As part of that, there really is a lot of
9 change proposed.

10 However, our overall objective is to try to
11 create the opportunities for change through targeted
12 city investment and other actions so that over time
13 it's in everybody's interest to see significant
14 change even to the street network and block scale of
15 the neighborhood.

16 We had a -- there's an urban form chapter of our
17 plan, which really points out that in many ways this
18 600 acres does not hang together as a single
19 connected neighborhood right now. So there are six
20 design ideas which are reflected throughout the plan.
21 Place-based districts in each of the four quadrants
22 of the neighborhood, focusing our density and
23 concentrating on transitions. A loop road and park
24 system, green infrastructure investments, and
25 enhancing the neighborhood's edges and transitions.

1 Coupled with that are the ideas of making this a
2 walkable neighborhood where people could walk within
3 five minutes and get to most of what they want to,
4 what they need on a daily basis that way, and
5 supporting a transition to a transit-ready community.

6 To support that urban form vision, we have a
7 package of proposed zoning changes. To a large
8 extent, zoning is recommended to continue what's here
9 today, but there are some significant changes. Two
10 areas in Madison and Lincoln Heights are proposed to
11 be zoned for residential as opposed to mixed-use
12 development to reflect their existing character. And
13 we are proposing some -- rather than the one-size-
14 fits-all zoning height limits that are here today --
15 high, medium, and lower height limits. And finally,
16 an industrial transition area in an area which is
17 currently light industrial along South Tacoma Way.
18 So the expanding the center and changing the zoning
19 from light industrial to commercial and industrial
20 mixed use.

21 Finally, the Planning Commission asked us to
22 bring forward two alternatives for zoning in the
23 Madison district, which is the area to the west of
24 Pine. And they are up on the screen. The difference
25 is that, in the staff recommendation, the height of

1 the core of the area would be 45 feet. In the
2 alternate, there are two areas along Warner Street
3 and at Madison School where the height would be
4 allowed to go up to 65 feet. So that's something
5 that members of the public here may wish to comment
6 on as part of this process today.

7 There is a package of design standards changes
8 both to residential and commercial development that
9 would take place in the future. The primary thrust
10 of these is really just to make sure that development
11 is oriented towards pedestrians so that buildings are
12 oriented towards the sidewalk, so that pedestrian
13 pathways and connections are attractive and safe and
14 prominent. There's also some increase in landscaping
15 and street trees requirements and some other -- some
16 commercial design standard changes to drive-throughs
17 and to pedestrian access.

18 It's a very exciting and ambitious transportation
19 and infrastructure package here. And again, we're
20 looking to handle and facilitate 25-plus years of
21 growth in this one plan. And to do that, we know we
22 need to invest heavily in our transportation
23 infrastructure.

24 So that the approach here is, we have a list of
25 city capital projects which really will transform

1 some of our streets so that they are safe and
2 comfortable for people who are walking and biking,
3 enhance our transit access, create a central transit
4 hub closer to the center of the neighborhood. Very
5 exciting. Over a hundred million dollars' worth of
6 capital projects over the next 25 years. And we do
7 really believe that will not only help with
8 transportation, but also a major place-making benefit
9 to the neighborhood.

10 In addition, the area currently has several very
11 large blocks or larger than what is recommended in
12 terms of a urban center district like we are trying
13 to achieve here. So the largest is actually the
14 Tacoma Mall, itself, which is over 50 acres without
15 any street connections, and there are some others
16 that are close to 20 acres in size. So the plan does
17 include a proposal to create new street connections
18 along with major private development.

19 And I know that we will hear some comment and
20 input on this topic from people here tonight. As the
21 Commission well knows, we've spent a lot of time
22 talking about this topic. And I will just mention
23 that, at the outs -- or at the conclusion of our
24 process here when we come back to you, staff is
25 prepared to come forward with a range of alternatives

1 related to those transportation proposals. So we
2 know we're going to be talking more about those.

3 For the audience, very briefly, why are we
4 emphasizing the importance of creating some new
5 street connections? It boils down in simple terms
6 to, if you have a small number of streets, all the
7 traffic has to go to those streets, so they have to
8 be big streets. That means that it's more difficult
9 to make them attractive and safe for pedestrians.

10 So the more street alternatives that you have,
11 the finer-grain street network that you have, the
12 more that you can make those streets calm and
13 attractive and more pedestrian oriented. So that's
14 really the thrust of the activity proposal. It also
15 is important in handling and accommodating the growth
16 that we are planning for here and in promoting a
17 shift in the urban form.

18 So moving on, we have some very exciting green
19 storm water and tree canopy proposals here. This
20 happens to be an area of the city where it's ideal
21 for green storm water techniques. That means that
22 water is able to go back into the ground rather than
23 having to get piped out and dumped into the Puget
24 Sound. So that's better in multiple different ways.
25 Environment, life of the infrastructure, even

1 creating a new funding source for us to -- to rebuild
2 many of our streets. So very ambitious green storm
3 water and green streets proposal.

4 In addition, we have proposed a major increase in
5 the amount of tree canopy in the neighborhood here.
6 It's currently about nine percent, which is not a lot
7 of trees. And through a range of actions, we believe
8 it's reasonable to reach 25 percent tree canopy
9 coverage by the year 2040.

10 Parks and open space proposals. The gist of this
11 proposal is that we heard from the beginning that
12 residents here really would like to have more
13 attractive and safe places for children and for
14 people of all ages to be in the neighborhood and that
15 that was one of the main missing features here. So
16 the plan is proposing some parks principles,
17 including a park or open space in each of the four
18 quadrants of the subarea, and then connected by a
19 green loop road that would allow you to walk from one
20 to the other. So that's the gist of the parks and
21 open space proposals. Madison School is also
22 strongly emphasized in the plan as a very important
23 community hub and asset.

24 Finally, this -- this is very much an economic
25 development plan. From Day 1, the actions that we

1 have put forward here and been working on are
2 intended to remove barriers that we have heard from
3 the development community are reasons why they would
4 choose not to invest in the area. And those are
5 things like problems with the transportation network,
6 that lack of neighborhood amenities and other things.
7 So we do really believe this is a way of encouraging
8 growth.

9 The upfront environmental impact review is also
10 very much an economic development strategy. And
11 finally, we have a chapter that really focuses on
12 other things we can do to promote growth and
13 investment here.

14 Housing choices are also something we have heard
15 over and over from the community are a very big issue
16 here. While this area is currently affordable as
17 compared to other areas of Tacoma, that could change
18 with time. And, in particular, if we really channel
19 a lot of growth here, it could really exacerbate
20 affordability. So the housing chapter includes
21 actions and benchmarking to try and track that issue
22 and take more, again, action if it becomes a big
23 problem in the future.

24 So local culture and identity. What makes a
25 neighborhood an attractive place to be? A lot of

1 that has to do with just attractive places. Places
2 where people can gather and have community events.
3 It has to do with making the public infrastructure
4 not only functional but again attractive and doing
5 things to bring in public art and support local
6 culture. So we're very excited about some of those
7 actions.

8 And finally, in the implementation chapter, we
9 have proposed a prioritization of the actions in the
10 plan. One of the most important is to initiate a
11 funding study early on in the implementation of the
12 subarea plan, in particular to focus on those
13 infrastructure investments and the connectivity
14 proposals.

15 Very last point. While the City is bringing this
16 forward, many of the actions would need to be
17 implemented by other public agencies, Metro Parks,
18 transit agencies, the school district, as well as
19 private property owners, who after all are the people
20 who would be investing and growing our economy, and
21 of course by people who live here. So this plan is
22 not intended as the City's plan but as the
23 community's plan.

24 So we're well -- we're over halfway through our
25 public comment period. Comments are requested and

1 due by September the 15th. I really hope everybody
2 will comment during that time. I wanted to provide
3 the Planning Commission with a brief overview of the
4 themes that we've been hearing so far in our
5 comments.

6 We have gone to the transportation commission as
7 well as the bike and pedestrian technical advisory
8 group, again to focus primarily on connectivity on
9 proposed South 37th Street, which is one of the
10 proposed new streets, as well as on the overall
11 transportation proposals. So we've got -- we are
12 expecting comments from both of those two groups.

13 And I think it's fair to say that they -- they
14 wrestled with those, with those issues, the same ones
15 that the Planning Commission has, in terms of seeing
16 the need and the importance of additional streets and
17 needing to make sure that it's fair, equitable,
18 avoids impacts to property owners and businesses, and
19 is feasible. So their comment letters will speak for
20 themselves, but do expect those.

21 We also had the informational meeting last
22 Wednesday right here in this room. And during that --
23 during that session, of course the street network and
24 connectivity was a very big theme. A lot of people
25 wanted to talk about design standards, so I expect

1 that you'll hear some more comments on that. Parking
2 comes up a lot. Functional and attractive yard
3 space. Development that has front doors facing
4 alleys. That's something that we'll continue to hear
5 about.

6 I expect we'll also hear comments on the zoning
7 proposals; in particular, the industrial transition
8 areas. There are some more industrial uses in those
9 areas, and those folks may come forward and have
10 something to say about them, which I hope that they
11 will.

12 And then residential heights. Again, we are
13 proposing some height changes there. So that's
14 something that people have been asking about.

15 I already mentioned housing affordability. That
16 continues to be an emerging issue, and I expect we'll
17 hear on that as well. Making the neighborhood more
18 safe, reducing crime, addressing nuisances. A lot of
19 enthusiasm about parks and open space. And I would
20 also just say a lot of enthusiasm for the capital
21 projects, the transportation projects, and the green
22 environmental projects, the parks and open space
23 proposals have come through as priorities.

24 I would encourage everybody here tonight to let
25 us know, let the Commission know what you think your

1 priorities are. There is a lot in this plan, and we
2 would love to know -- we'd love to have your help in
3 prioritizing implementation.

4 So again, written comments are due by September
5 the 15th. Between now and then, on September the
6 13th, the City Council IPS Committee, the
7 Infrastructure, Planning, and Sustainability
8 Committee, will be doing a tour, a bus tour of the
9 neighborhood.

10 And a quick order of business. I wanted to ask
11 Planning Commissioners who are able to attend that,
12 despite your busy schedule, would you -- would you
13 let us know tonight so that we can just confirm and
14 make sure we have -- the voice of the Planning
15 Commission can be represented there?

16 And after that, again we'll be back before you
17 with some of the summarized comments that we've heard
18 from the public on the 20th and October 4th and
19 October 18th. Again, we hope that we will be able to
20 bring forward a package for your consideration to
21 recommend to the city council.

22 And last word. I hope I haven't spoken too long.
23 To everyone here tonight, if there's any way that I
24 or other people can help you to understand the
25 proposals, please don't hesitate to let us know. I'm

1 happy to come talk to you in your workplace or
2 residence. And we really would like to hear from
3 you.

4 So thank you for your patience with my
5 presentation.

6 CHAIR WAMBACK: Thank you very
7 much, Elliott.

8 So we will now begin the public testimony
9 process. I'm going to receive the sign-in list.

10 All right. So it appears that we have 17 people
11 signed up to speak. When I call your name -- and
12 what I'm going to do is call up three names at a
13 time. So invite a speaker up, and then the next two
14 people in queue will know who they are. You'll be
15 speaking from that microphone in the center of the
16 room.

17 It's important for the -- with this extensive
18 record and for this extensive plan that we are able
19 to identify you by name, your address, and your
20 affiliation for the record. Looks like many of you
21 have already signed that information up here. If you
22 haven't provided that to us, please provide your
23 name, address, and affiliation, and we can get that
24 on the record.

25 After exhausting the signup sheets, I'll do what

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1 I did on the previous hearing and open it up for
2 other people to come forward.

3 As with the other hearing, testimony is limited
4 to three minutes. So with that, I will begin in the
5 order that was signed up. Forgive me, between my
6 glasses and the long day. Valerie Fyalka-Munoz.

7 VALERIE FYALKA-MUNOZ: Yes.

8 CHAIR WAMBACK: Followed by John
9 Brekke and Eleanor Brekke.

10 VALERIE FYALKA-MUNOZ: Hi. I'm
11 Val, Valerie Fyalka-Munoz. I have been in real
12 estate for 40 years --

13 UNIDENTIFIED SPEAKER: We can't
14 hear.

15 VALERIE FYALKA-MUNOZ: -- in the
16 Tacoma --

17 UNIDENTIFIED SPEAKER: We can't
18 hear.

19 VALERIE FYALKA-MUNOZ: Oh. In the
20 Tacoma area. I'm from --

21 UNIDENTIFIED SPEAKER: Please turn
22 up the microphone.

23 VALERIE FYALKA-MUNOZ: I'm from
24 Tacoma -- wait. Let me start over.

25 I'm Valerie Fyalka-Munoz. I have been in real

1 estate for 40 years in the Tacoma area. I'm from
2 Tacoma. I help manage Michael's Plaza at 2921 South
3 38th. I have been going to the Tacoma Mall
4 neighborhood meetings for over a year. The Tacoma
5 Mall neighborhood plan places an excessive burden and
6 encumbers Michael's Plaza with new roads on the
7 median-term and long-term vision maps. The roads and
8 37th Street will restrict businesses, devalue the
9 property, and restrict the ability for future
10 development.

11 The topography has a difficult 20-foot slope
12 coming off of Pine Street. The cost to construct a
13 road will be costly endeavor and will restrict the
14 property. Presently, Michael's Plaza has eight
15 entrances for ingress and egress. The city planners
16 would be wiser to development and improve the
17 existing road system and not encumber and burden the
18 commercial property owners with 37th and other roads.

19 The Tacoma Mall neighborhood plan is an excessive
20 taking of private property rights. The plan is
21 unconstitutional. The nexus and proportionality is
22 unreasonable. We are going to defend our
23 constitutional rights and will let the courts decide.
24 Thank you.

25 CHAIR WAMBACK: Thank you.

1 John Brekka, Eleanor Brekka, and Nikki Rohloff.

2 ELEANOR BREKKA: I'm Eleanor
3 Brekka.

4 JOHN BREKKA: And I'm John Brekka.

5 ELEANOR BREKKA: And we're going to
6 do our testimony together since both each have three
7 minutes, but...

8 We are brother and sister, and our parents
9 developed the raw land in the northwest quadrant 35
10 years ago, which is now Cedar Plaza, and our family
11 takes great pride in our property. We also own
12 commercial real estate in several other urban
13 transition areas such as SoDo, Southcenter, and
14 downtown Auburn.

15 We have been participating in this process for
16 over a year now. Overall, we are for having a
17 subarea plan. I'd like to start by specifically
18 stating what we like about the subarea plan. The
19 City's interests in the neighborhood, creating a
20 transit center, and working to bring rail to the
21 area, bringing more than identity to the area and
22 creating a destination, improvements to existing
23 streets, grant money for street improvements and
24 helping revitalize the neighborhood, recognizing the
25 neighborhood is residential, commercial, and

1 industrial in nature.

2 JOHN BREKKA: We've had a chance to
3 read through the several hundred pages. And the one
4 overriding theme that is still a concern is
5 connectivity. And this is shared by not just us but
6 the 30 or 40 other people that expressed, the
7 commercial property owners and businesses that
8 expressed these concerns earlier on in the process in
9 the stakeholder meetings that went on.

10 We need to arrive at a connectivity plan that
11 allows owners to operate their properties and
12 businesses. And we don't want to stifle development
13 in this neighborhood. We have an above-average
14 vacancy rate in our well-managed project, and we're
15 receiving rents in the Kent Valley and some of our
16 warehouses higher than the rents we're receiving in
17 our complex here. So it needs to be done right.

18 And we're not starting with raw land. That's
19 what our family started with 35 years ago when we
20 developed this center. And if we are going to make
21 connectivity changes, it needs to happen when the
22 bulldozers are out, when it possibly becomes raw
23 land, and there needs to be room for incremental
24 development on the sites where additions can be made
25 to the build -- to buildings, additional small

1 buildings can be added to the site, and not before
2 that. A 15-percent trigger point has been mentioned
3 in the plan, and that's far too low and is out of
4 touch.

5 So the other major concern is the filing of
6 connectivity plans. These plans will burden the
7 property for the next, you know, 15 to 20 years.
8 Large parts of the property. It requires the
9 property owners to negotiate with the City, negotiate
10 with neighborhood property owners, and it's really
11 rather unrealistic in nature. And it's going to
12 stifle development and stagnate the area, and I don't
13 think we want -- we don't want that. I don't believe
14 anybody in Tacoma wants that. So we need to be wise
15 about what we're proposing.

16 And with a connectivity requirement of a pathway
17 of various sizes every 150 feet, you're talking about
18 dividing a 16-acre parcel into 32 smaller chunks of
19 half an acre apiece. That is very far-reaching in
20 nature. And there's room for connectivity in the
21 subarea. There already is some connectivity in the
22 subarea. But there's also justification for larger
23 parcels with. And we've seen that need with the
24 University of Washington in Tac -- University of
25 Washington Tacoma branch, the Convention Center, the

1 Tacoma Dome, the central police facility, the mall,
2 corporate campuses, midsize -- midsize shopping
3 centers, and such. So there needs to be room, and it
4 makes sense to have room for those larger parcels
5 along with some smaller parcels in nature.

6 ELEANOR BREKKA: The last thing I'd
7 like to bring up is something that we previously
8 shared, and it's -- we continue to question the cost-
9 benefit of 37th Street when there are viable
10 alternatives at lower cost and without topography
11 issues and significant right-of-way acquisitions.
12 For example, extending 35th Street and Cedar Street
13 to connect to South Tacoma Way and the Water Flume
14 Trail.

15 If the proposed 37th Street is deemed necessary
16 by the City, then it should be a Tier 1 street, which
17 is City-led, City-funded right-of-ways, acquisitions,
18 and City-constructed. Thank you.

19 CHAIR WAMBACK: All right. So we
20 have Nikki Rohloff, Kate Lantiff, and Zak.

21 NIKKI ROHLOFF: Hi. My name is
22 Nikki Rohloff, and I live in the Tacoma Mall
23 neighborhood. I'll be honest. I thought that was
24 just a sign-in for the meeting. So my comments are
25 informal, but just to give perspective for somebody

1 who lives in that area.

2 I live in the Apex, right by the mall. I
3 basically tell people I live in the Tacoma Mall
4 parking lot. But in that short little block from
5 where I live to the mall, I only have a sidewalk that
6 goes halfway to the mall. There's no crosswalk to go
7 over to the pet store, to Joann's. And getting over
8 to Red Robin is nearly impossible. So even though I
9 live right there and could walk to anything in a
10 minute, it's nearly impossible. So sidewalks, I
11 think, would be -- are great and would be a priority.

12 I'm excited about the new I-5 ramp going directly
13 to Tacoma Mall Boulevard. That intersection at 38th
14 and Steele is a nightmare, especially with
15 Chick-fil-A. And I feel, with all of the multifamily
16 units that I've been going in, a great idea in the
17 green area would be a dog park, an unleashed dog park
18 for the people who don't have a place for their dogs
19 now.

20 And then with the multiunit living spaces, I
21 would just encourage more parking. Right now where I
22 live, we have five parking garages and it's still not
23 enough to accommodate everybody that lives there.

24 And Heaven forbid if you want to have a guest over.

25 Nearly impossible. So thank you.

1 CHAIR WAMBACK: Thank you.
2 All right. We have Zak Klineman (phonetic). No?
3 Jack Knottingham.
4 Jeffrey Mann. No, Jeffreys here.
5 After Jeffrey will be Angelia Alexander.

6 JEFFREY MANN: Good evening,
7 Mr. Chairman, members of the Planning Commission.
8 Jeff Mann with Pierce County Planning -- well,
9 Planning and Public Works now, a new department, and
10 they're representing the County's interest in our
11 annex campus that is located within the -- within the
12 plan area.

13 I've been on the stakeholder group for the last
14 couple years. And we asked in 2015 to be a part of
15 the plan. And we're grateful that we were included
16 in the plan, and of course want to see our -- and
17 feel like we are an asset to the plan area as a major
18 employer. And that's recognized in the plan on Page
19 SP17. And I appreciate that, that's recognized as an
20 asset as a major employer.

21 We've been very supportive of some of the key
22 concepts of the plan, the loop road. I think
23 that's -- that's a wonderful concept with the
24 improved crossings on 38th. Also the storm water
25 management approaches there, the low-impact

1 development techniques, the green streets program,
2 and increased parks and recreation area, as well as
3 the zoning scheme, which I feel is appropriate for
4 the annex campus.

5 We've made a couple of recommendations. Among
6 other things, to provide a transit connection between
7 the Tacoma Dome and the subarea plan area. And feel
8 like that's necessary. And also we have a
9 recommendation for additional park land close to the
10 annex campus.

11 However, our primary concern with the plan is the
12 impact of the connectivity proposal. Specifically
13 with regard to the bike boulevard, the street
14 connection from South 35th to South Tacoma Way, which
15 is on Wright Avenue. That is shown in the plan area
16 as bisecting -- completely bisecting the annex
17 campus, including going right through the existing
18 building, and would have a significant impact on our
19 potential to develop the site in the future. We may
20 need to use the site for a significant County
21 facility, and a street going directly across the
22 property would have a significant impact.

23 It is a bike boulevard. If it's just something
24 that goes around a building, through a parking lot,
25 that's different than doing an actual boulevard right

1 through the middle of the property. That boulevard
2 does connect to Wright Avenue, which is about a 10-
3 to 15-percent grade. So it'll be very difficult for
4 biking. I don't see anybody using it now, and I
5 don't foresee that being used in the future.

6 So our request, kind of bottom line, is -- and
7 it's not shown on the priority maps for that road,
8 but our request is that that road crossing the annex
9 campus would be deleted from the plan and so we can
10 continue to use that site as a major employer and
11 further the goals of the -- of the subarea plan.
12 Thank you very much.

13 CHAIR WAMBACK: Thank you.

14 All right. Angelia -- is that right --
15 Alexander, followed by Amy Pow and Venus Dergan.

16 ANGELIA ALEXANDER: I'm the clerk,
17 which means something like a chairperson, for the
18 Tacoma Friends Meeting, which is the Quaker meeting
19 whose meeting house is located at the top of South
20 39th Street on the hill, the eastern end. If you --
21 if you leaped off the end of that street, you'd land
22 on Chick-fil-A, just to give you an idea of where we
23 are for sure.

24 The original map I saw of the plans for bike
25 paths, by the way, had a bike path going down there.

1 And I think I was able to convince Elliott that that
2 wouldn't work. Didn't see it on any of the
3 subsequent maps. I too thought I was just signing up
4 to let you all know I was here. So I'll try to keep
5 this brief and speak from the heart.

6 It struck me pretty early on that this whole area
7 has not really much of a sense of place or
8 neighborhood. And I think we've struggled with that
9 over the conversations in the last year. Nobody
10 could come up with a substitute name for it, for
11 example. That will come with time. But it means
12 that people who work, own property, live here, and so
13 on, need to have a sense of what that identity and
14 sense of place is.

15 That means to me that the neighborhood
16 development, the business-side developments, and all
17 of that have to be sensitive to quality as well as
18 quantity, and also to the kinds of costs it can mean
19 for -- to the business owners, for example. You've
20 already heard about that.

21 On one of the original plans that I saw, it
22 looked as if the City was going to be prepared to buy
23 us out on our little place at the top of the hill.
24 And I don't think that's going to happen anymore
25 either. We might choose to sell to the City, but I

1 don't think the City's planning to buy us out. If it
2 ends up that way, I'll be surprised.

3 But we're prime to be a kind of spot that could
4 connect well to whatever parks might be planned for
5 the green space that's just to the east of that huge
6 post office complex. That's undeveloped land, and it
7 could be perhaps developed better into some kind of
8 parks, green space.

9 I guess that's -- that's probably all I can think
10 of to say at the moment. I will be bringing this
11 topic up to our Quaker meeting. We have our business
12 meeting this coming Sunday around 11:15. If anybody
13 would like to see how we Quakers do business, we come
14 to unity around whatever we're going to decide.

15 I would suggest that you-all think about moving
16 in that direction so that property owners who would
17 like to have a better quality for their residences
18 and the business owners who would like us to be
19 sensitive to their needs don't ever feel like any of
20 them are losers in this whole concept. Thank you.

21 CHAIR WAMBACK: Thank you.

22 All right. Amy Pow, Venus Dergan, and then
23 Christian Kopuski (phonetic). I'm sure I just
24 massacred that one.

25 CHRISTIAN KONOPASKI: Close enough.

1 CHAIR WAMBACK: Thank you.

2 Good evening.

3 AMY POW: Good evening, Planning
4 Commissioners. I'm Amy Pow, principal planner for
5 Tacoma-Pierce County Health Department. Thank you
6 for collaborating with the health department to
7 develop this very important subarea plan. This
8 neighborhood is very diverse, filled with a lot of
9 low-income populations, and is very transient.
10 Residents in this area has experienced a very low --
11 a very high health disparities and a shorter life
12 expectancy than average Tacomans.

13 Last year, the board has adopted a resolution on
14 health in our policies, encouraging cities and towns
15 to consider health in all decision-making. We have
16 demonstrated with your City staff how this can be
17 done in your subarea plan. We have partnered with
18 the City and stakeholders in the last 30 months to
19 infuse health in every step of decision-making. We
20 outreached and empowered local residents to
21 understand their needs to make it more livable and
22 decent area.

23 Above all, we also apply a triple bottom line
24 health framework to make sure that health is embedded
25 in each chapter in throughout the plan, to create the

1 vision that we all envisage for.

2 There are several health issue that we hold very
3 dear to our heart from the get-go of this planning
4 process. Amongst them, we have particular concern
5 about the possible involuntary displacement of low-
6 income residents in this neighborhood as the economy
7 and the environment improves over time. We strongly
8 feel that maintaining the current level of affordable
9 housing in this neighborhood is crucial. Besides we
10 try our best to make sure the local residents will
11 champion on for to implement this plan as well as to
12 welcome newcomers to join them to build this
13 neighborhood together.

14 To actualize walkable urbanism, there are many
15 good policies and actions in this plan, including a
16 playable loop road, the Madison School hub, tree
17 canopies and green infrastructure. The only comment
18 that the health department particular concerned is,
19 is that the current performance measures in the
20 health chapter talking about the target performance
21 for the entire neighborhood is too low.

22 Our quick analysis shows that according to
23 American community survey, five years estimates,
24 about 90 percent of the current housing stock of the
25 entire neighborhood is renting less than \$1,250 per

1 month, and 25 percent is actually renting less than
2 \$750. To help minimize the impact of gentrification,
3 we strongly encourage the City to maintain a closer
4 percentage of affordable housing for the entire
5 neighborhoods over time for those low- and very-low-
6 income neighbors.

7 Today I encourage you to support this plan to the
8 council for adoption together with the DEIS, with our
9 comments being incorporated. Once fully implemented,
10 I'm sure the social fabric and economy will be
11 improved, the natural environment be improved as
12 well, and the motor vehicle traffic will be reduced,
13 and after all, health and equity will be bettered.
14 Thank you.

15 CHAIR WAMBACK: Thank you.

16 Okay. So we have Christian is next. Oh, I'm
17 sorry. Venus. Excuse me. Venus Dergan, Christian,
18 and then Fran?

19 CHRISTIAN KONOPASKI: Francesca.

20 CHAIR WAMBACK: Francesca. Thank
21 you.

22 CHRISTIAN KONOPASKI: I'll be
23 speaking for her.

24 CHAIR WAMBACK: All right.

25 CHRISTIAN KONOPASKI: We're

1 together.

2 CHAIR WAMBACK: So Venus.

3 VENUS DERGAN: Okay. Hello again.
4 My name is Venus Dergan. I'm a longtime resident in
5 south Tacoma, live in Manitou, and I'm a Manitou
6 representative. I again had just signed up just to
7 state that I was here, but I did make a couple of
8 notes because I did attend the meeting last
9 Wednesday. And I'm just going to follow up to the --
10 to the lady here in regards to affordable housing.
11 That was one of the notes that I -- that I made.

12 I've lived in south Tacoma most of my life, and I
13 represent people who I believe a lot of us are median
14 to low income. And we have a lot of seniors that
15 live in our area as well. And when you have an AMI
16 that's too high, I don't think that these multifamily
17 dwellings are really considered affordable housing at
18 the rents that you plan on renting them out at, and
19 that was one of the concerns that I had.

20 I also viewed a couple as a person who might want
21 to rent one of these apartments that have just been
22 developed. And a couple of things that I noticed in
23 regards to those apartments is that my quality of
24 life living in those apartments. And what I've
25 noticed is, I saw multifamily dwellings that had

1 their front door in the alley. I would not want my
2 front door in the alley. I don't know why that
3 design was ever allowed, but I would not want my
4 front door in the alley.

5 There's no open space. It's -- they're
6 stacked on -- you're stacked on top of each other.
7 There's no open space for children. There's no
8 parking for anybody who has a vehicle of any size.
9 So I don't know anybody with a large vehicle who
10 would be able to be accommodated at one of these
11 apartments.

12 I think that we're -- that the height restriction
13 is too high. I saw a rendering of 38th Street, the
14 new design. And the height of 65 feet is too high.
15 I like a skyline, myself, and I didn't see a skyline
16 there. And I think if you want to live in a concrete
17 or work in a concrete jungle, you need to keep that
18 in the downtown area and not in the south Tacoma
19 area. That's -- that's my feeling.

20 And in regards to transit, I ask that in regards
21 to transit, that the transit station have a stop at
22 the mall again like it used to. Being across the
23 street from the mall is burdensome to every disabled
24 senior, anybody who has to get to the mall. And I
25 think it's dropped people coming to the mall because

1 the transit bus drop-off is across the street.

2 I took the bus once in the winter and had to walk
3 from across the street to the mall, and I swore I'd
4 never do it again. And that's because my vehicle was
5 broken down. I don't know how the elderly do it. I
6 don't know how disabled people do that. But it has
7 to be reconsidered in the plan, that people be
8 dropped off. If you want buyability at the Tacoma
9 Mall and people to attend the Tacoma Mall, the
10 transit center needs to be there at the mall where
11 people can have access, direct access to the mall.
12 Thank you.

13 CHAIR WAMBACK: Thank you.

14 Okay. We have Christian, then Francesca, and
15 Beverly.

16 CHRISTIAN KONOPASKI: Okay. I'm
17 Christian. I'm here to represent myself and
18 Francesca. We own a multifamily property in the area
19 that's under discussion. And while I'm in favor of a
20 lot of the concepts in the plan, the City has failed
21 to implement a number of the concepts that are
22 already in the plan; namely, paving streets,
23 sidewalks, storm water.

24 We've had two years now of new taxes that are
25 supposed to be funding this. We have third-world

1 streets in our neighborhoods. We have no sidewalks.
2 We have gigantic lakes when it rains. And the City
3 is not funding any of these neighborhoods. They're
4 funding streetscaping projects in the Lincoln
5 District or downtown. And we want to spend a hundred
6 million dollars on this project.

7 I object to any funding by the City for any new
8 projects until they bring the City's infrastructure
9 standards of streets, sidewalks, and storm water
10 drainage up to modern standards.

11 CHAIR WAMBACK: So that was
12 Christian speaking on behalf of himself and
13 Francesca. So that means Beverly Bowen Bennett,
14 Gerald Pleasant, and Stuart Johnston. And then
15 Stuart is actually the last person that's signed up.

16 And as I mentioned earlier, after we exhaust the
17 sign-in list, I'll see if there's anybody else who
18 wishes to speak who hasn't already spoken.

19 BEVERLY BOWEN BENNETT: Thank you.
20 There's a man who understands a short woman when he
21 sees her. Does that count on my three minutes?

22 CHAIR WAMBACK: No.

23 BEVERLY BOWEN BENNETT: Okay.

24 CHAIR WAMBACK: We'll start the
25 three minutes now.

1 BEVERLY BOWEN BENNETT: All right.
2 I wanted to make sure that you knew that I read this
3 entire document and understand it perfectly.

4 CHAIR WAMBACK: Excellent.

5 BEVERLY BOWEN BENNETT: Not.

6 CHAIR WAMBACK: Just don't quiz me
7 when you go for a walk.

8 BEVERLY BOWEN BENNETT: I stalk him
9 because he works by where I walk. I think it's his
10 fault, not mine.

11 I'm going to limit myself to three things tonight
12 because you only gave me three minutes. No front
13 doors on alleys. Now, I read in one of those
14 documents that we were going to kind of make it okay
15 if the developer was willing to make it look like a
16 street or a mews. Well, I say then, if it's a street
17 or a mews, the front door's not on the alley. So
18 there would be no reason in God's green Earth that it
19 could not say in clear terms that everyone would
20 understand "no front doors on alleys." And actually,
21 in the very original document that was given to me,
22 Elliott, at the very, very first meeting and showed
23 the goals of this plan, no front doors on the alley
24 was one of those goals. I was surprised when I found
25 that.

1 Now I want to talk about Metro Parks. It has
2 come to my attention that the matrix that they use
3 for deciding where to put their parks has to do with
4 the geography of an area and nothing to do with the
5 population. So the number of apartments, townhouses,
6 four-bedroom units that are now existing in the west/
7 southwest quadrant of the subarea plan is not
8 reflected as a need. We have one little corner,
9 according to one of the pictures in there, that says
10 that we are not currently having enough parks.

11 Did any of you go by that park that is not a
12 park, that is in the Lincoln Heights? It's not a
13 park. But I tell people there's a park there. They
14 say, "Where?" Then when they go by, they say, "Oh,
15 yeah, I see it now." But it's not a park.

16 And then I'm going to stand up for the wall
17 walkers -- mall walkers. I said that wrong. Mall
18 walkers. It has come to my attention -- I know in
19 the winter I've been doing it, walking in the mall.
20 And rather than the rain or the snow, I go to the
21 mall. There are hundreds of people of all ages that
22 walk in the mall. We even have a secret entrance
23 where we go in before it's quite ready for us to go
24 in and walk the mall.

25 There's a gentleman who comes all the way from

1 Eatonville to walk our mall because the mall that's
2 in Puyallup on the South Hill is not conducive for
3 walking. So when we talk about our connectivity,
4 it's a little scary to me if we do something to make
5 it difficult for the mall walkers to do their loops.
6 So I know it's a small thing, but there really are
7 hundreds of people who walk every single day in that
8 mall. Thank you.

9 CHAIR WAMBACK: Thank you.

10 All right. The last two people that we have
11 signed up are Gerald Pleasant and Stuart Johnston.

12 No? Gerald? Stuart? Neither of you?

13 All right. Well, that concludes the list of
14 people that had signed up to testify. If you have
15 not already spoken tonight, but you would like to
16 avail yourselves of three minutes to speak your piece
17 to the Planning Commission, I would invite you to
18 first raise your hand to let me know if there is
19 anybody interested. I see a couple people.

20 All right. So could you -- we don't have another
21 sign-in list, do we? Oh, we do? Okay. So let's do
22 this. We'll just start at the front of the room and
23 work our way back. Either before you speak or right
24 after you speak, if you would do me the favor and
25 write your name down on the sign-in sheet. Then we

1 have the record. Thank you.

2 BOB BEARDEN: Hi. My name is Bob
3 Bearden. I've been working with Elliott and his
4 group since the onset of this project started. And
5 just like Beverly before me, I have read the EIS.
6 Okay? Believe it or not, I borrowed it from him last
7 week and was able to finish it. There's a couple of
8 issues in there that is just concerning that either
9 the public did not get a chance to -- or really state
10 what they really wanted to even though we heard it at
11 these numerous public groups.

12 One is the vegetation. The mayor wants 40
13 percent of the town covered in the next 10 years.
14 Okay. We know we're getting rid of the mayor. No
15 problem there.

16 However, what has been decided is deciduous trees
17 versus evergreen. Tacoma has a problem in the winter
18 with the pollution in the air. Most of us old folks
19 and younger ones or those with disabilities have
20 problems breathing during that time. If you continue
21 to plant deciduous at 60 percent versus 40 percent,
22 that's not going to help us.

23 Besides that, as was previously stated, this is a
24 transient community. Nobody takes care of the
25 gutters. They wait until there's huge water puddles

1 out there and they call the City as an emergency.
2 Evergreen trees will prevent that. So we need to
3 take a look at the types of trees that's going to be
4 presented overall. And this is going on for future
5 projects throughout Tacoma also.

6 Another thing is, when the City brought in
7 designers to start this project, they brought them in
8 from New York City and Washington, D.C. You probably
9 know who they are already. You probably talked to
10 them. They continually talked about people liv -- or
11 enjoying their afternoon on stoops. Tacoma does not
12 have stoops. New York City and "Washington, D.,"
13 has stoops.

14 Now, for those who don't know what stoops are,
15 it's their front porch or their steps, which is right
16 on top of the sidewalk next to the roadway. In other
17 words, there is no yard. There's nothing but street,
18 sidewalk, and stoops to sit on. Kids and family does
19 not have an opportunity to sit out and enjoy what
20 little summer we do have here in Tacoma. So we
21 really need to get rid of that concept design where
22 peoples gonna sit on their front porch and love what
23 Tacoma has to offer.

24 Developments. Development had a strong input
25 into this project. Development came on strong at

1 almost every community meeting, saying that, "We
2 need, we need, we need. We need the City to give us
3 this and this and this." We need to stop giving
4 development everything in the world, 10 years' worth
5 of tax-free property, 10 years' worth of tax-free
6 water/sewer. We need to stop doing this and make the
7 developers responsible for brown water recycling in
8 the future. They can build a multilevel apartment
9 complex and not be responsible for collecting
10 rainwater or anything else within their building.

11 Technology has allowed us to do this on numerous
12 occasions. So to cut down even the water issues in
13 the, not necessarily sewer, but definitely brown
14 water, they can make some recycling or utilize
15 holding tanks on brown water instead of just putting
16 it down the sewers and sending it on down the system.
17 They can utilize this.

18 It is important that -- and Elliott caught
19 this -- that development and the City and community
20 buy into these things together so that parks that can
21 be built outside of large apartment buildings or
22 whatever can be possibly purchased by the developers
23 and put in place, maintained by the parks department
24 or whatever, in addition to what's already being
25 planned, which is, as Beverly suggested, doesn't

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1 really fit the population of where people live. I
2 mean, it's great if you're a bicyclist. You've got
3 places to stop along the way between mercantile, but
4 not residential.

5 So my time's up, but thank you very much, folks,
6 for listening.

7 CHAIR WAMBACK: Thank you very much
8 for your time tonight. Make sure you sign up on
9 that --

10 BOB BEARDEN: I will.

11 CHAIR WAMBACK: -- sheet that he
12 has right back there.

13 I don't know who signed up next, so just...

14 JOHN BURKHALTER: I'm taller than
15 that. My name is John Burkhalter. I represent
16 Michael's Plaza. And I know I stand before you many
17 times talking about connectivity. And I do want to
18 thank you for listening to us and taking our
19 comments, and I'd like to thank Elliott for, I'm
20 sure, countless more meetings that he's been to than
21 I have.

22 You know, the plan is -- is needed. I mean, we
23 need to have a plan. We need to know where we're
24 going in the future. The idea is to have thoughtful
25 growth and revitalization, which the community in

1 that area really needs and we would love to see. I
2 even heard Elliott mention today that, you know, the
3 plan is to promote growth. And I agree with that.
4 But some of the things in the plan I think don't
5 promote growth. And, you know, as you all know, one
6 of those issues for us is connectivity.

7 And the reason being is, we currently have 65
8 feet of height in zoning, and we will not build a
9 project that's 65 feet tall in the next 20 years,
10 unfortunately, unless something radical happens. And
11 so by requiring dedication of right-of-way and all
12 the improvements that go along with that, and I -- I
13 think you guys -- I don't know if you heard my speech
14 in the transportation commission, but we're talking
15 an acre and a half of roads, sidewalks.

16 For every acre, that's roughly 20,000 cubic feet
17 of detention and storage. At 10 bucks a foot, it
18 would be about thirty -- \$300,000 for just that, not
19 to mention the collection systems, the asphalt, the
20 curbs and gutters. I can't even remember the
21 numbers. But it's a lot of money, and it all adds
22 up.

23 So if we can't build a 65-foot project now, the
24 zoning that we're getting out of the plan is 75 feet,
25 up to 120 feet with bonuses. You could see where

1 that devalues the property because we can't even
2 build a project today. So in some respects, by
3 having such a vision, we're actually stifling growth.

4 And so I was hoping that the Commissioners would
5 think about potentially stepping back and maybe
6 softening the language. You know, at least saying,
7 Hey, when the development happens, you need to look
8 at this and you need to provide, you know,
9 consultants and information about how that
10 connectivity would benefit your project or our
11 project and, you know, benefit the neighborhood.

12 I'm sure it would benefit the neighborhood. I'm
13 not sure it would benefit our project, but that's a
14 whole nother story. And then if we couldn't think
15 about that, maybe think about the idea where, you
16 know, if we're gonna have ground-floor retail, it
17 certainly behooves us to provide sidewalks and
18 connectivity to make sure that we have plenty of
19 storefronts and plenty of opportunities for people
20 to, you know, spend money and bring in sales tax.

21 So if we could -- you know, we can do biking, we
22 can do pedestrian stuff, but we don't have to
23 dedicate a road to do it. There's so many things
24 that come out of that, that cause problems for
25 development, that I just hope that you'll think about

1 that.

2 And then one final thing is, in the interim to
3 get there, to make sure that whatever the triggers
4 are -- and I'm a little scared about some of those
5 triggers, Elliott -- that they don't -- aren't --
6 aren't too onerous. Meaning, why do I need to come
7 up with a plan for connectivity when you already told
8 me what the connectivity plan is? So that -- those
9 kind of things like, I don't want to write a report,
10 hire some consultants, and spend \$25,000 in order to,
11 you know, do a 10,000-square-foot addition. Things
12 like that.

13 And then one final thought was, I was reading in
14 the zoning code stuff, and it said, Oh, hey, if you
15 have X amount of foot or you built something right
16 next to a right-of-way over here, that you would have
17 connection to it. And I was thinking, I thought that
18 was already sort of in the building code as part of
19 ADA. It was, like, Hey, you need to be able to get
20 out of a building, have ADA access to the
21 right-of-way, I'm assuming in case of an emergency or
22 something. So I just -- some stuff to think about.
23 Anyway, I appreciate it. Thank you.

24 CHAIR WAMBACK: Thank you.

25 Welcome.

1 J. J. McCAMENT: Thank you. J. J.
2 McCament, McCament & Rogers, 708 Broadway in downtown
3 Tacoma. Elliott had challenged us at last week's
4 public meeting about coming up with our vision for
5 the northwest quadrant of the Tacoma Mall subarea
6 plan. And I cannot say that there has been any work
7 done on a -- on a northwest division with all of the
8 property owners. And I'm not a property owner
9 either. But being familiar with the area, I thought
10 that I would put together some rough notes and at
11 least share those with you. So, Elliott, this is in
12 response to your request.

13 My vision for the northwest quadrant. I'm
14 speaking only for myself. City-led improvements and
15 economic development efforts that help create a
16 strong and healthy neighborhood economy necessary to
17 spur a fresh look and feel for the neighborhood where
18 pride of ownership is evident and property owners and
19 tenants prosper.

20 An overall cool physical setting that encourages
21 property owners to invest in their properties,
22 existing businesses to expand, and new businesses to
23 bring jobs, services, and entertainment. The private
24 dollar follows the public dollar as the northwest
25 quadrant responds to stronger market demand. In

1 essence, a riding -- a rising tide that lifts all
2 boats.

3 Contributing to the fresh look and reputation for
4 the northwest quadrant, a couple items that I saw:
5 Newly surfaced streets with underground utilities,
6 street trees, sidewalks, streetlights, sidewalks
7 built the length of every street, and bicycle and
8 pedestrian connections to regional trails.
9 Landscaped commercial frontages with regular
10 maintenance. Crime-free and garbage-free. Tasteful
11 signage. South Cedar and 35th extended westerly to
12 connect to South Tacoma Way on the Water Flume Trail.

13 Expanded Pierce Transit bus service and a new
14 Sound Transit station to serve the neighborhood. And
15 finally, a medical campus, restaurants, and
16 entertainment that combine to make this a happening
17 place, both day and night. Thank you.

18 CHAIR WAMBACK: All right. Since I
19 don't have the sign-in sheet. Justin.

20 JUSTIN LEIGHTON: Steal my thunder.

21 Justin Leighton. I live in the Hilltop, 2149
22 South "M" Street. I'm here, I'm going to do what I
23 effectually call the David Bowie, where I'm going to
24 wear several hats. And I will let you know when I
25 take one hat off and put on another.

1 The first hat that I'm going to put on tonight is
2 I'm the cochair of the transportation commission.
3 And at our last meeting we had a good discussion with
4 Elliott about this subarea plan. And it is my
5 understanding that at one of your meetings you had
6 sought the transportation commission's point of view
7 on 37th Street. We haven't had an opportunity to get
8 there yet.

9 However, we -- I just want to let you know we do
10 have a subcommittee working on it and we will discuss
11 it at our next meeting and get a comment letter to
12 the Planning Commission, what we think not just about
13 37th Street, but generally how the plan in a
14 transportation perspective fits into the rest of the
15 city and what -- the transportation master plan. I
16 was telling Beverly, only us nerds carry around plans
17 in our cars and in our -- our bags.

18 Taking that hat off and just putting on "citizen
19 Justin" hat, I've had the great opportunity to
20 doorbell this district three times over and talking
21 with these neighbors about their community, folks
22 like Beverly Bowen Bennett. And not just walking
23 through their neighborhood, but understanding what
24 they want.

25 And I think that we all want a shared community

1 that is vibrant, that we encourage places where we
2 live, work, and play all in the one spot so we don't
3 have to rely on our vehicles. I think it's quite
4 interesting. We talk a lot about walkability. And
5 in the current environment -- and this is not just in
6 this neighborhood, but in all parts of our own city
7 and other cities -- these large parking lots. If you
8 end up having to park at the end of it, there's no
9 sidewalks to get you from your car all the way to the
10 front door of the businesses. That's today. In
11 fact, I actually encourage the Planning Commission to
12 work with the transportation commission to figure out
13 code to address that issue now for the entire city.

14 When I think about street trees and lighting and
15 curb gutters, I think about a city. And I am lucky
16 enough to travel around, not just this country, but
17 the world. But the places I find myself wanting to
18 continue to come back to are places that have all of
19 these elements.

20 The master plan talks a lot about super-blocks
21 and not creating those. And we need to break down
22 those barriers. There are reasons why connectivity
23 is important. It goes to the health of folks, from
24 what we've heard from the department of health. When
25 we encourage walking, when we encourage biking, when

1 we encourage folks to use transit, they're healthier.
2 And when we have a healthier community, they're
3 actually cheaper for us to serve on.

4 I was able to cochair the Hilltop subarea plan.
5 It took a long time. In fact, Commissioner Waller
6 was a part of that effort. And I understand that
7 this plan, just like that plan, is very aspirational
8 and it's going to take years and decades to even see
9 it through. And nothing in these two plans are
10 saying that it has to happen today or it's being
11 forced upon you.

12 And my last comment, if I may. As a fellow
13 commissioner that's served on other committees, it's
14 our jobs to not just hear what is being heard today,
15 but also try and represent those people that don't
16 have the privilege to come to this meeting tonight
17 because they're putting food on the table for their
18 kids of they're at work or they just didn't have the
19 ability to get here. Thank you.

20 CHAIR WAMBACK: Thank you.

21 All right. Was there anybody else?

22 Okay. So I'll remind everybody that the Planning
23 Commission will continue to accept oral testimony on
24 this topic through Friday, September 15th, 2017, at
25 5 p.m. And with that, I will close the public

1 hearing. Did I say written testimony? Yeah, written
2 testimony. Excuse me. Thank you, Vice Chair
3 Petersen. "At the conclusion of oral testimony,
4 state that written comments may be submitted."

5 All right. So we are moving on to -- we have two
6 communications items on the agenda. So we'll start
7 with Mr. Wung.

8 LIHUANG WUNG: Thank you, Mr. Chair
9 and members of the Commission.

10 So just to reiterate your communication items.
11 First of all, you will be conducting a special
12 meeting next Wednesday, September 13th. It's a
13 special meeting because it's scheduled outside of the
14 regularly scheduled first and third Wednesdays'
15 meeting. And this particular meeting on the 13th
16 will be a public hearing. The subject of the public
17 hearing is the proposed tideflats area land use
18 interim regulations. The location will be the
19 Greater Tacoma Convention Center. The starting time
20 of the public hearing is 6 p.m. For -- interested
21 citizens can check more information on this Web
22 address: www.CityofTacoma.org/TideflatsInterim.

23 The second item is the council's IPS Committee
24 will be conducting a tour.

25 CHAIR WAMBACK: Mr. Wung.

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1 LIHUANG WUNG: Yes.

2 CHAIR WAMBACK: Before you go on to
3 that, can I ask the Commissioners to -- I'd like a
4 show of hands of Commissioners that are planning to
5 attend next Wednesday's hearing. Make sure that we
6 are not running into a quorum problem. So one, two,
7 three, four, five -- is that a "yes" or a "maybe"?

8 COMMISSIONER WALLER: That's a
9 "yes."

10 CHAIR WAMBACK: That's a "yes." So
11 that's six Commissioners. I, unfortunately, will be
12 traveling out of town. Some family matters have come
13 up. So that is six members. That is just one above
14 our quorum.

15 UNIDENTIFIED SPEAKER: That's
16 correct.

17 CHAIR WAMBACK: So that directly
18 relates into the next item. So let's transition to
19 the IPS tour.

20 LIHUANG WUNG: Very good. Thank
21 you, Mr. Chair. I'm going to call on Elliott to talk
22 about this IPS tour that will get into your
23 scheduling of the 6:00 hearing. Elliott.

24 ELLIOTT BARNETT: Testing. Ah,
25 thanks, Jeff.

1 Chair Wambach, the IPS Committee is going to be
2 conducting a tour. It will start at 4:30, and we're
3 trying to get it done by 5:45, partially because of
4 your other commitment that night. And previously we
5 had had four Planning Commissioners express
6 willingness to go along on this -- on this ride. And
7 we do think it would be valuable and important to
8 have Commissioners there who might kind of listen and
9 relay information back and forth. So there's no
10 question of the value, but at the same time, you're
11 very busy.

12 So hoping to get it done by 5:45. In fact, if
13 you wanted to make sure you were done by, say, 5:30,
14 we could work with you and figure out where to leave
15 your car on the route and be sure to get you at least
16 a half an hour to go from one meeting to the next.

17 With that, there had been four Commissioners
18 expressing interest. And, great, I see Commissioner
19 Edmonds, I think, expressing that you can join us on
20 that tour. So that is great.

21 Are there other Commissioners who are able to
22 carve that time out?

23 COMMISSIONER EDMONDS: Am I the
24 only one?

25 ELLIOTT BARNETT: Going once.

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1 CHAIR WAMBACK: I think that
2 Commissioner Beale had expressed an interest, but I'm
3 not sure. I'm playing e-mail tag. I'm not sure if
4 he's actually going to be available next week.

5 The thing that I am concerned about -- again, I
6 apologize. I'm not going to be able to be in town.
7 But it's crucial that we have a quorum of
8 Commissioners present so we can start the hearing at
9 6 p.m. Since we're expecting so many people to
10 attend, I would say that the hearing at 6 p.m. is far
11 more important than joining the city council, so...

12 ELLIOTT BARNETT: Agreed.

13 CHAIR WAMBACK: I think if
14 Commissioner Edmonds is the only Commissioner that's
15 going to go on the tour, I think it's good to have a
16 Planning Commission presence, but at least having
17 five people so we can start the meeting on time,
18 'cause we may have a lot of people there. And the
19 longer --

20 COMMISSIONER EDMONDS: I will be
21 there at --

22 CHAIR WAMBACK: So --

23 COMMISSIONER EDMONDS: -- the
24 meeting.

25 CHAIR WAMBACK: All right. Well...

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1 COMMISSIONER EDMONDS: I'll drive --

2 CHAIR WAMBACK: Good luck on --

3 COMMISSIONER EDMONDS: -- behind --

4 CHAIR WAMBACK: -- parking.

5 So -- so that's -- is there any special
6 arrangements made for parking at the Convention
7 Center for all the attendees? Are the garages going
8 to be open that night? We'll take -- take transit.
9 That's a good -- busses and transit? I've heard of
10 those things.

11 Okay. So Commissioner Edmonds will be joining
12 you, Elliott. And we'll get some other folks, as
13 long as we don't run into a quorum problem.

14 ELLIOTT BARNETT: And other folks
15 who are here, if you're interested in joining that
16 tour, come and ask me about it and I can give you the
17 details. Thank you.

18 CHAIR WAMBACK: Thank you.

19 Is there any other business before the Commission
20 tonight? Any members have anything else they'd like
21 to add?

22 All right. Well, I'd like to thank everybody for
23 joining us tonight. Thank you for staff for
24 arranging this location in the south Tacoma area.
25 And with that, I'll call this meeting closed.

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(Meeting adjourned at
6:36 p.m.)

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2 County of Pierce) ss a certified court reporter
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4 hereby certify:

5 That the foregoing meeting of the CITY OF TACOMA
6 PLANNING COMMISSION was had in my presence and adjourned on
7 September 6, 2017, and thereafter was transcribed under my
8 direction; that the transcript is a full, true and complete
9 transcript of the said meeting, transcribed to the best of
10 my ability;

11 That I am not a relative, employee, attorney or counsel
12 of any party to this action or relative or employee of any
13 such attorney or counsel and that I am not financially
14 interested in the said action or the outcome thereof;

15 IN WITNESS WHEREOF, I have hereunto set my signature on
16 the 13th day of September, 2017.

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