



City of Tacoma
Planning Commission

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October 18, 2017

The Honorable Mayor and City Council
City of Tacoma
747 Market Street, Suite 1200
Tacoma, WA 98402

RE: Tacoma Mall Neighborhood Subarea Plan and EIS

Honorable Mayor and Members of the City Council,

On behalf of the Tacoma Planning Commission, I am forwarding our recommendations on the proposed Tacoma Mall Neighborhood Subarea Plan. Enclosed is the *"Planning Commission's Findings and Recommendations Report, October 18, 2017"* that summarizes the proposal, the public review process, and the Planning Commission's deliberations.

In July 2015, the City of Tacoma embarked on an ambitious effort to work with, and in, the communities surrounding the Tacoma Mall, to develop a shared vision, goals and actions for this important regional growth center. This effort brought to bear an exceptional level of analysis and engagement to address the unique needs and opportunities of this area. The City is planning for a major concentration of jobs and housing growth here. To accommodate that growth consistent with the community's vision, the neighborhood must function well on many levels. Proactive and coordinated transportation, infrastructure, housing, environmental, neighborhood, community, economic development and other actions are essential.

The Planning Commission believes that adopting the Subarea Plan, and associated Environmental Impact Statement, will be a milestone in the transition of this place into a more complete, compact and connected neighborhood with a strong and positive identity and an empowered community. The proposals are very much consistent with the Vision 2040 and Transportation 2040 Plans, the One Tacoma Plan and the City's strategic goals for a safe, clean and attractive community and a diverse, productive and sustainable economy. Adopting this Subarea Plan builds on the successful Downtown Tacoma Subarea Plans and fulfills the City's commitment to plan proactively for growth in our designated Regional Growth Centers. The proposed actions will catalyze positive change that makes this neighborhood a distinctive and desirable place to live, work, shop and invest.

The Subarea Plan calls for a significant amount of change over time. There has been much attention paid to the proposal for the creation new streets when major redevelopment occurs. The final street connectivity proposals represent countless hours of collaborative discussion and an evolution in thinking as to how the City can work with existing landowners during future development projects. We believe the recommended approach is clear, equitable and supportive to existing businesses and property owners, while providing new tools to work toward the mutual benefits to be realized from creating a more connected street network in the future.

Specifically, the Planning Commission recommends that the City Council:

- Adopt the Tacoma Mall Neighborhood Subarea Plan including a vision, goals and actions for growth and positive change through the year 2040;
- Update the City Comprehensive Plan Future Land Use Map to expand the Tacoma Mall Neighborhood Regional Growth Center by 116 acres; and,
- Adopt a set of code changes including an area-wide rezone that includes new zoning boundaries and height limits, transportation and pedestrian access provisions, and design standard changes laid out in Land Use Appendices 1 and 2.

Concurrent with the Subarea Plan, the City has prepared a Draft Environmental Impact Statement which will be finalized prior to City Council action. The adoption of the Final EIS will streamline SEPA procedures for future project-level review that is consistent with the Subarea Plan. Through this approach, the City can catalyze development and investment in the neighborhood, and at the same time achieve more coordinated and effective mitigation actions than would be possible with project-level SEPA review.

We respectfully request the City Council take steps to follow through on this vision. In particular, the plan calls for a major increase in capital investment in the neighborhood, supported by the consideration of new funding mechanisms. Key actions including a freeway off ramp, relocation of the transit station, park and open space investments, and others require collaboration with local and regional partners. City leadership and engagement with partners will be essential to success.

Finally, the Commission wishes to recognize and thank the many community members, business owners and landowners who dedicated the time and insight necessary to shape the future of the Tacoma Mall Neighborhood.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Wamback". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Stephen Wamback, Chair
Tacoma Planning Commission

Enclosure



TACOMA MALL NEIGHBORHOOD SUBAREA PLAN AND ENVIRONMENTAL IMPACT STATEMENT (EIS)

TACOMA PLANNING COMMISSION
DRAFT FINDINGS OF FACT AND RECOMMENDATIONS
October 18, 2017

A. SUBJECT:

Approval of the Tacoma Mall Neighborhood Subarea Plan and Environmental Impact Statement (EIS). The proposed Plan would become an element of the Comprehensive Plan and includes Land Use Regulatory Code changes.

B. SUMMARY AND BACKGROUND:

Subarea Plan

The purpose of the Tacoma Mall Neighborhood Subarea Plan is to anticipate, support, and guide the long-term community development in the Tacoma Mall Neighborhood Subarea – an approximately 601-acre area including the current Tacoma Mall Regional Growth Center and an approximately 116-acre expansion area, and to complete a pre-development environmental review that will identify how to address environmental and community issues while reducing development uncertainty and risk. The Subarea Plan provides innovative planning and policy interventions to help the Tacoma Mall Neighborhood Subarea achieve its potential for community development, an outcome that will deliver a broad range of equitable social and environmental benefits at both the local and regional scales. The Plan will serve as a statement of the City's commitment to and direction for future development in the Tacoma Mall Neighborhood Subarea in addition to serving as a resource for potential investors, property owners, the community and other public agencies.

The Subarea Plan supplements current Tacoma policies governing the environment, land use, economics, transportation, parks and recreation, public services, and utilities. The Plan supports the City's Comprehensive Plan, while focusing on issues and opportunities at a scale that is responsive to the Subarea's specific needs. The Project plans for significant growth in the Subarea based on allocations established by the PSRC and Pierce County to conform to the State Growth Management Act (GMA), which requires regions, counties, cities and towns to plan for forecasted growth. The two regional plans put forth by PSRC are VISION 2040 and Transportation 2040; planning frameworks intended to support the accommodation of forecasted growth in a manner that best meets the needs of the central Puget Sound region as a whole. Both plans have been analyzed and approved through an exhaustive EIS process.

The Tacoma Mall Neighborhood's designation as a Regional Growth Center by the City of Tacoma and the Puget Sound Regional Council indicates that the neighborhood is planned to be one of the Puget Sound region's most vibrant, dense urban centers, accommodating a significant portion of the City of Tacoma's future housing and employment growth. This planning effort supports neighborhood growth that would approximately triple the 601-acre neighborhood's resident population and double its total jobs by 2040 (adding roughly 8,800 new residents and 8,400 new jobs).

The Subarea Plan is a road map for businesses, residents and public agencies to partner to achieve the following vision:

By 2040 the Tacoma Mall Neighborhood will be a thriving center of regional significance and a distinctive, connected, livable and healthy place offering a wide range of opportunities for all people to live, work, invest and fulfill their potential.

The Subarea Plan is intended to guide growth to support the community's vision for a pedestrian-friendly urban mixed-use neighborhood with a high level of access to services and transportation options. The neighborhood in 2040 will thrive due to its central location and transportation choices, diverse range of jobs and shopping, unique local character and culture, attractive urban form, green features and sustainable infrastructure, and comprehensive neighborhood amenities. It will be home to a diverse

community of residents, businesses, and institutions empowered to help shape growth and change in the neighborhood. The recommended actions also address long-standing neighborhood aspirations for street improvements, more control over growth and change, neighborhood amenities and services, and public and private investment in the area.

Proposed implementation actions in the Subarea Plan will apply urban form, land use, housing, transportation, environmental, parks and open space, community empowerment, economic development, utilities and services, funding and implementation goals and actions. Among the most significant actions are the expansion of the Regional Growth Center to include an additional 116-acres, proposed zoning changes to support urban form and other goals, an innovative area-wide green stormwater strategy and tree canopy target, and a robust area-wide transportation strategy including a well-supported capital projects list and new connectivity requirements with major development. The Tacoma Mall Neighborhood Subarea Plan, along with the three Downtown Tacoma Subarea Plans, helps to set the stage for the needed Federal, State, and regional funding and other actions to promote growth within Tacoma's two designated Regional Growth Centers.

Environmental Impact Statement

The City of Tacoma has prepared a non-project EIS for the Tacoma Mall Neighborhood Subarea Plan and issued a Draft EIS on August 11, 2017 along with the public review draft of the Subarea Plan and proposed code changes. The City will issue the Final EIS on or about November 6, 2017. A non-project EIS involves a cumulative environmental impact and mitigation analysis for the entire Subarea, rather than piecemeal analysis on a project-by-project basis. This will streamline City review of development consistent with the Plan, as well as produce better outcomes overall.

This EIS analysis supports the planning process with an assessment of the likely impacts of two growth alternatives. Under the No Action Alternative it is assumed that development will occur within the current Regional Growth Center boundaries based on existing zoning and development regulations. Any such development or redevelopment that is proposed within the Tacoma Mall Neighborhood Subarea in conjunction with the No Action Alternative would undergo environmental review on a project-by-project basis. Such projects would be subject to site-specific State Environmental Policy Act mitigation and appeal potential. The Action Alternative considers growth that occurs within the study area under different development patterns based on the vision, goals and actions recommended in the Tacoma Mall Neighborhood Subarea Plan. The recommended Subarea Plan incorporates an additional 116 acres into the Regional Growth Center and includes a package of development regulation changes and other actions as developed through the subarea planning process.

The EIS identifies three types of mitigation measures to address the anticipated impacts: 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. The EIS demonstrates that no significant unavoidable adverse impacts are anticipated as a result of the Subarea Plan and implementing actions, and further provides ample evidence that the Subarea Plan will more effectively guide growth to support the community's vision and goals for the neighborhood.

The Subarea Plan incorporates an area-wide transportation strategy that calls for robust public investment in streets and rights-of-way as well as for the creation of new connections across large blocks when major redevelopment occurs. The proposal creates a new permit process, TMC 13.06.660 Site Approval, calling for a discretionary review process when proposed development located within defined large blocks exceeds SEPA thresholds. Per the transportation analysis and the conclusions of the EIS, providing for through connections across existing large blocks is a vital strategy to accommodating growth, and to meeting the transportation and urban form goals of the Subarea Plan. Throughout the planning process, the proposal to create new streets has also a sensitive topic for property owners. The final proposal reflects a substantial amount of analysis, dialogue and compromise intended to allow and support existing

businesses and property owners to continue, maintain and reasonably expand their businesses, and to require a transportation connectivity planning process when large-scale development is proposed.

The non-project EIS provides developer certainty and predictability, thereby streamlining the environmental review process and furthering the goals of the State Environmental Policy Act (SEPA) and the GMA. The non-project EIS is subject to RCW 43.21C.420, known as "Transit Infill Review." Recognizing that RCW 43.21C.420 (5) (a) and (b) include a sunset provision, the lead agency has also proceeded under RCW 43.21C.031 (planned action) and RCW 43.21C.229 (infill exemption), to provide additional SEPA tools if provisions in RCW 43.21C.420 (5) (a) and (b) expire.

For a non-project EIS completed under RCW 43.21C.420, the SEPA-based appeal opportunity will occur in conjunction with issuance of the non-project Final EIS, on or about November 6, 2017. Consistent with RCW 43.21C.420, a proposed development will not be subject to project-specific SEPA-based administrative or judicial appeals if the proposed development is (1) proposed within 10-years of the issuance of the subarea Final EIS, (2) situated within the subarea, and (3) appropriately addresses the adopted subarea plan and development regulations. Similarly, there are no SEPA noticing requirements for subsequent, site-specific development or redevelopment within the subarea that appropriately addresses the subarea plan and development regulations.

C. LOCATION:

The geographic area of the Tacoma Mall Neighborhood Subarea Plan and EIS project encompasses an area of approximately 601 acres. The subarea is located approximately 2.5 miles southwest of Downtown Tacoma and 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. The Subarea incorporates the previously designated Tacoma Mall Regional Growth Center which is approximately 485 acres in size, and an approximately 116-acre expansion area generally located to the west and northwest of the previous RGC boundaries. The approximately 601 acres is being designated as the Tacoma Mall Neighborhood Regional Growth Center.

D. FINDINGS OF FACT:

- 1. Comprehensive Plan and Development Regulations** – The *Comprehensive Plan*, adopted in 1993 by Ordinance No. 25360 and amended by ordinance on an annual or biennial basis thereafter, is Tacoma's Comprehensive Plan as required by the State Growth Management Act (GMA) and consists of several plan and program elements. As the City's official statement concerning future growth and development, the Comprehensive Plan sets forth goals, policies and strategies for the health, welfare and quality of life of Tacoma's residents. The *Land Use Regulatory Code*, Title 13 of the Tacoma Municipal Code (TMC), is the key regulatory mechanism that supports the Comprehensive Plan.
- 2. Planning Mandates and Guidelines** – GMA requires that any amendments to the Comprehensive Plan and/or development regulations conform to the requirements of the Act. Proposed amendments to the Comprehensive Plan and/or development regulations must also be consistent with the following State, regional and local planning mandates and guidelines:
 - The State Growth Management Act (GMA);
 - The State Environment Policy Act (SEPA);
 - VISION 2040, the Growth Management, Environmental, Economic, and Transportation Strategy for the Central Puget Sound Region (adopted on April 24, 2008, and amended on May 28, 2009);
 - Transportation 2040, the action plan for transportation in the Central Puget Sound Region (adopted on May 20, 2010);
 - The Countywide Planning Policies for Pierce County; and,
 - TMC 13.02 concerning the procedures and criteria for amending the Comprehensive Plan and development regulations and for area-wide zoning reclassifications.

3. Public Outreach Efforts:

Staff has 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 entities that staff has approached and worked with include, but are not limited to:

American Institute of Architects, Asia Pacific Cultural Center, Citizens for a Healthy Bay, Community Health Care, Costco, Cross District Association, Courage 360, Impact Capital, Intercity Transit, Jennie Reed Elementary School, Master Builders Association, McCament and Rogers, Metro Parks Tacoma, Pierce County Affordable Housing Consortium, Pierce County AIDS Foundation, Pierce Conservation District, Pierce County government, Pierce Transit, Puget Sound Energy, Puget Sound Regional Council, Puyallup Watershed Initiative – Active Transportation COI, Safe Streets Tacoma, Simon Corporation, Sound Transit, Tacoma Farmers Markets, Tacoma Friends Meeting, Tacoma-Pierce County Chamber of Commerce, Tacoma Pierce County Economic Development Board, Tacoma Housing Authority, Tacoma Pierce County Health Department, Tacoma School District, University of Washington Tacoma, Washington State Department of Archaeology and Historic Preservation, Washington State Department of Commerce, Washington State Department of Ecology, the Washington State Department of Transportation, Washington State Health Care Authority, as well as area residents and property owners and businesses.

In addition, staff engaged with the Planning Commission, Transportation Commission, Bicycle Pedestrian Technical Advisory Group, Joint Municipal Action Committee, Sustainability Commission, South Tacoma Neighborhood Council, City Council Infrastructure, Planning and Sustainability Committee, City Council Vitality and Safety Committee, as well as the City Attorney's Office, Community and Economic Development Department, Environmental Services Department, Fire Department, Neighborhood and Community Services Department, Planning and Development Services, Police Department, Public Works, and Tacoma Public Utilities.

4. Public Notification Process:

Public notification for the Subarea Plan and Environmental Impact Statement was provided throughout the project.

(a) An initial Community Meeting was held on August 26, 2015, at the Madison Elementary School Complex. Notice of the Community Meeting included general illustrations and descriptions of buildings that are generally representative of the maximum building envelope that could be allowed under the Subarea Plan and notice was posted on major travel routes within the Subarea. In addition, notice was mailed to all:

- Property owners, renters of record and licensed businesses within the Subarea and within or within 400 feet of the boundaries of the Subarea;
- Agencies with jurisdiction over future development within the Subarea;
- All preservation and development authorities established under chapter 43.167 RCW, TMC 13.12.560(d) (2).
- The Tacoma Public Library
- The Department of Ecology
- Neighborhood Councils, qualified neighborhood community organizations, and business districts
- The Puyallup Tribe
- 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
- (b) Two Scoping Meetings were held, the first on September 17, 2015, at the Asia Pacific Cultural Center and the second on October 22, 2015 at the Tacoma Municipal Building. Notice of the Scoping Meetings was mailed to:
- Property owners, renters of record and licensed businesses within the Subarea and within or within 400 feet of the boundaries of the Subarea;
 - Agencies with jurisdiction over future development within the Subarea;
 - All preservation and development authorities established under chapter 43.167 RCW, TMC 13.12.560(d) (2).
 - The Tacoma Public Library
 - The Department of Ecology
 - Neighborhood Councils, qualified neighborhood community organizations, and business districts
 - The Puyallup Tribe
 - 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
- (c) 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;
 - All preservation and development authorities established under chapter 43.167 RCW, TMC 13.12.560(d) (2).
 - The Tacoma Public Library
 - The Department of Ecology
 - Neighborhood Councils, qualified neighborhood community organizations, and business districts
 - The Puyallup Tribe
 - 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
- (d) A Notice of availability will be mailed upon issuance of the Final EIS and will include notice of the Final Draft Subarea Plan City Council Public Hearing tentatively scheduled for November 21, 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;
 - All preservation and development authorities established under chapter 43.167 RCW, TMC 13.12.560(d) (2).
 - The Tacoma Public Library

- The Department of Ecology
- Neighborhood Councils, qualified neighborhood community organizations, and business districts
- The Puyallup Tribe
- Email notice will be sent to the Planning Commission notification list, community groups, stakeholders, and other interested parties.
- A notice will be published in the Daily Index and The News Tribune
- **Public Notice Signs** – Public notice signs were installed throughout the Subarea prior to the initial Community and Scoping Meetings in 2015 and again 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”.
- **Environmental Review** – The Final Environmental Impact Statement (Final EIS) for the Tacoma Mall Neighborhood Subarea Plan was 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 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. The Final EIS accompanies the proposed Tacoma Mall Neighborhood Subarea Plan and should 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. The FEIS will be issued on or around November 6, 2017.

5. Public Hearing Comments:

The Planning Commission conducted a public hearing on September 6, 2017, 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 37 written comments were received during the comment period. It is also noted that staff organized an informational meeting on August 30, 2017, at the Asia Pacific Cultural Center during the public comment period. Staff also prepared a Public Comments and Staff Responses Summary which summarized public comments and staff’s responses, and where appropriate, staff’s suggested revisions to the Plan. The Public Comments and Responses Summary was provided to the Commission at the September 20, 2017 meeting. Full-text copies of the comments received from the Planning Commission and staff-led comment periods are compiled in Exhibit D.

The following themes emerged from the public comments received on the draft proposals during the public comment period:

General comments:

1. Support for City focus, investment and high level goals of the plan
2. Avoid making anyone feel that they are losing through City actions
3. A plan for thoughtful growth is needed, it must be appropriate to market realities
4. Clarify that this is a long range plan and an ideal vision
5. Be clear regarding requirements versus options, what is occurring with Plan adoption
6. Edits and clarifications

Urban Form:

1. Support for creating a more positive image and identity, aesthetic improvements, walkable urbanism actions and transit-oriented development
2. Developments should include yard space (rather than front stoops)
3. Different views of the vision for the Northwest District
4. Large blocks can be a benefit to business recruitment efforts

Land Use:

1. General support for proposed zoning and Regional Growth Center expansion
2. Clarify relationship between the Subarea, Downtown, and the South Tacoma Manufacturing/Industrial Center
3. Strengthen design, landscaping and onsite open space development standards
4. Questions regarding Subarea Plan boundaries (car dealerships not included)
5. More parking is needed in the neighborhood
6. Front doors should not face alleys
7. Permitted building heights are too high
8. Make warehousing a permitted use at the Puget Sound Energy site
9. Limit the number of townhouses and/or make them more attractive/accessible
10. Question on the link between building height and green streets

Housing:

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

Transportation Choices:

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

Connectivity Plans:

1. Increasing connectivity is an important goal for this neighborhood
2. The proposal balances goals of preserving large parcels and increasing connectivity

3. The proposal would be an excessive burden, stifle development, take private property rights, and is too ambitious given current market realities
4. Proposed process is onerous and complex
5. Thresholds proposed are too low
6. Opposition to proposed S. 37th Street and S. Wright Avenue
7. Clarify City funding role
8. City should pay for S. 37th Street if it is needed, and extend it eastward to Fife St.
9. Larger blocks should not be required to subdivide beyond 600 x 600 feet
10. Connectivity should be planned at the time of major redevelopment, not before
11. Replace the proposed connectivity plan requirement with internal bike/pedestrian network based on the Tier 3 bicycle/pedestrian connections
12. Sites with restricted access should be exempt

Pedestrian Access Standards:

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

Environment:

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

Community Vitality:

1. Support for local serving services and amenities
2. Crime is a big issue in the neighborhood
3. Choosing a new name needs to reflect authentic community engagement
4. Support for parks, open space actions, Madison School as a community hub
5. Metro Parks Tacoma and Tacoma School District should implement the parks vision
6. Clarify what it means to show a proposed park on a map
7. Current proposal does not include enough/the right parks
8. A large park is not needed, do smaller green areas
9. Remove the park in the Mall District which is privately owned land
10. Specific comments regarding various proposed parks (e.g., dog park, skate park)
11. Metro Parks Tacoma cannot commit to plan without separate action

Shared Prosperity:

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

Utilities and Services:

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

Implementation:

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

6. Additional Information:

During the planning process and public outreach for the project, comments and concerns were expressed regarding several key issues within the Tacoma Mall Neighborhood Subarea. After consideration of the public comments and staff's suggested modifications, the Commission determined that modifications be made to the Draft Plan on these key issues, as summarized below.

General:

- Minor changes to clarify the intent of the proposals
- Clarified intent to promote significant growth and change over time without placing undue burdens on existing businesses and property owners

Land Use Chapter:

- Text and map changes 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 concentration

Housing Chapter:

- Affordable housing targets for the Tacoma Mall Neighborhood were increased from 25% of housing affordable to households earning 80% of Area Median Income (AMI) and 12.5% affordable at 50% of AMI, to 50% affordable at 80% of AMI and 25% affordable at 50% of AMI
- Added an action calling for a near-term study to identify strategies to prevent involuntary displacement of low income households

Transportation Choices Chapter:

- Three modifications were made to the proposed Bicycle and Pedestrian Network map (Figure T-11):
 1. Modified the proposed *Wright Ave Bike Boulevard* to indicate desired connection points, rather than a specific alignment
 2. Added connections from the *Loop Road* to South Tacoma Way and S. 35th Street
 3. Modified the proposed *S. 40th Street Bike Connection* to follow S. 40th Street to Union Ave., then Union Ave. to S. 38th Street
- Three modifications to the proposed Transportation Projects list and maps (Table T-2 and Figures T-12, T-13 and T-14):
 1. *Area-wide Sidewalk Gaps* was moved from the Mid-term Priorities section to the Near-term Priorities section
 2. *S. 35th Street Bike Corridor* was moved from the Long-Term Priorities section to the Mid-Term Priorities section
 3. Map changed to reflect the revised alignment of the *S. 40th Street Bike Connection*
- Modified the proposed Connectivity Plan requirement, as follows:
 1. Restructured as a "Site Approval" review process, integrated with existing Tacoma Municipal Code review and appeal processes and including a discretionary City review

- of transportation impacts (pages T-13 to T-15 and Land Use Appendices LU-1 and LU-2)
 - 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 (Figure T-9)
 - 3. Increased review thresholds for “Site Approvals” to be consistent with City SEPA review thresholds (Appendices LU-1 and LU-2)
 - 4. Retained Transportation Impact Assessments for all Subarea Plan projects which exceed SEPA review thresholds (Appendices LU-1 and LU-2)
- 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):
 1. Clarified applicability to various site sizes
 2. Reduced the requirement for alterations less than 50% of valuation to only providing a path to the sidewalk
 3. Provided exemptions and exceptions for certain land uses that are less pedestrian-oriented
 4. Allowed site access to be restricted when necessary for public safety or operational reasons
 5. Reduced the width of proposed through-connections

Environment Chapter:

- Highlighted the importance and benefits of actions to protect and recharge the South Tacoma Aquifer (Introduction and Environment Chapters)

Community Vitality Chapter:

- Clarified that the proposed Conceptual Parks and Open Space plan (Figure CV-2) is not intended to be regulatory or binding

Shared Prosperity Chapter:

- Designated an approximately four-block area between Pine and Lawrence Streets, and S. 35th and S. 36th Streets as a Catalyst Site (Figure SP-1).

Implementation Chapter:

- Called for tracking the completion of transportation projects and other implementation actions to ensure they are keeping up with the pace of growth (new Action IMPL-5).

E. CONCLUSIONS:

1. The Planning Commission concludes that the proposed Tacoma Mall Neighborhood Subarea Plan and EIS are consistent with the Comprehensive Plan.
2. The Planning Commission concludes that the proposed Plan and EIS properly reflects the community’s desire and will position the City well for potential funding opportunities, and are aligned with the regional vision as set forth in VISION 2040.
3. The Planning Commission concludes that the Subarea Plan accurately reflects the intent of and is consistent with the Countywide Planning Policies.
4. The Planning Commission concludes that effective implementation of the policies within the Subarea Plan should improve the attractiveness, use, and overall quality of development within the Subarea, and result in an enhanced, interconnected public access system that provides an attractive amenity for the recruitment and retention of businesses and residents to the City of Tacoma.

5. The Planning Commission concludes that the Tacoma Mall Neighborhood Subarea Plan will facilitate transit-oriented development through its policies that support transit and transit agencies, transportation mode-shifting, and complete streets.
6. The Planning Commission concludes that the Subarea Plan is the policy document that enables the actions needed to achieve the Vision of the Tacoma Mall Neighborhood Subarea as it provides a long-term, coordinated framework to promote ongoing growth and positive change for the area.
7. Concerning the proposed code changes associated with the Tacoma Mall Neighborhood Subarea Plan, the Planning Commission concludes that the proposed amendments to the Land Use Regulatory Code will adequately address the goals and desires of the citizens of Tacoma and will improve the cohesiveness of the Code.
8. The Planning Commission further concludes that the proposed Tacoma Mall Neighborhood Subarea Plan, as described above, is consistent with the Growth Management Act, will benefit the City as a whole, will not adversely affect the City's public facilities and services, and appears to be in the best interests of the public health, safety and welfare of the citizens of Tacoma.
9. Adoption of the modifications to the Regional Growth Center boundaries and zoning designations enacted through the Tacoma Mall Neighborhood Subarea Plan shall enact corresponding updates for consistency to several maps and exhibits of the One Tacoma Plan, including the Future Land Use Designations and Mixed-Use Centers maps, and to the discussion of the Tacoma Mall RGC in the Urban Form Chapter.

F. RECOMMENDATIONS:

The Planning Commission recommends that the City Council adopt the Tacoma Mall Neighborhood Subarea Plan, as set forth in Exhibit A, as a new element of the Comprehensive Plan and adopt the proposed amendments to the Tacoma Municipal Code, Title 13 Land Use Regulatory Code, as set forth in Exhibit B. The Planning Commission also provides the *Draft Environmental Impact Statement for the Tacoma Mall Neighborhood Subarea Plan, Issued August 11, 2017*, as set forth in Exhibit C, for the City Council's reference.

G. EXHIBITS: *(compiled separately from this report)*

- Exhibit A. Draft Tacoma Mall Neighborhood Subarea Plan
- Exhibit B. Proposed Amendments to the Tacoma Municipal Code Title 13 Land Use Regulatory Code
- Exhibit C. Draft Environmental Impact Statement for the Tacoma Mall Neighborhood Subarea Plan, Issued August 11, 2017
- Exhibit D. Public Comments received on the Draft Subarea Plan
- Exhibit E. Revisions to the One Tacoma Plan for consistency with Regional Growth Center boundary and zoning changes