



City of Tacoma
Planning Commission

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November 2, 2022

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

RE: Proposed College Park Historic Special Review District

Honorable Mayor Woodards and Members of the City Council:

The Tacoma Planning Commission tonight voted 4 yays, 2 nays and 1 abstention to deny the application for a proposed residential historic district overlay zone – the College Park Historic Special Review District – according to the procedures outlined in the Tacoma Municipal Code Chapter 13.07.060. Unlike other Comprehensive Plan and zoning amendments that the Commission typically reviews, which are presented to the City Council in the form of positive or negative recommendations regardless of the level of support from the Planning Commission, historic overlay zones require the support of the Planning Commission to advance to Council. In this case, that lack of support effectively ends the consideration of the College Park Historic Overlay Zone unless an appeal is duly filed by November 16, 2022 to advance the proposal to City Council.

As Chair of the Planning Commission, I feel it is important to share some of our thoughts, observations and recommendations with the City Council despite the fact that the proposal itself will not be forwarded for Council's consideration.

This proposal was a challenging review for several reasons. The Planning Commission received the proposal with a do-pass recommendation from the Landmarks Preservation Commission, which conducted its own lengthy review, including a public hearing, from May 2021 to April 2022. During that process it was clear that there is a significant amount of neighborhood support for the College Park Historic District. At the same time, the Landmarks Commission recognized that this proposal touches on many policy areas, particularly housing policy and Home In Tacoma specifically, and the City's efforts to improve outcomes in diversity, equity and inclusion. While the Planning Commission understands the reasons for resident support of the district proposal, we also find that in its current form the district is at odds with adopted policy priorities that generally are guiding development towards intensified, moderate to high density transit-oriented uses, including a mix of affordable housing types.

In its role, the Landmarks Commission included recommendations for a review of Comprehensive Plan policies and regulatory code relating to the historic district designation process and criteria to improve alignment between historic preservation initiatives and other City policy priorities. Likewise, the Landmarks recommendation proposes a review of the historic district designation process and the coordination between Landmarks Commission, Planning Commission, and City Council. The Planning Commission generally concurs with the Landmarks Commission, and more specifically recommends the following:

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- The Planning Commission recommends that Comprehensive Plan policies and regulatory code relating to historic districts be reviewed and amended at the earliest appropriate amendment cycle, to include review of consistencies between historic preservation policies and policies elsewhere in the Comprehensive Plan relating to housing, equity, and sustainability.
- The Planning Commission concurs with the Landmarks Preservation Commission's recommendation for a review of the code that outlines the historic district designation process, to improve understanding of the respective roles of each commission, and City Council, and to align the process with other similar land use policy reviews.
- The Planning Commission recommends reviewing the utility of fees for design review for properties on the Tacoma Register of Historic Places, including those within locally designated historic districts and individual City Landmarks; particularly if the value to the City is appropriately balanced with the impact to community members.
- For future local historic district proposals, the Planning Commission concurs with the Landmarks Preservation Commission's recommendation to reduce the burden on property owners and residents within local historic districts by relaxing or reducing design review requirements, including:
 1. Alterations to non-visible elevations should be exempted from the historic district design review requirements. Other exemptions consistent with the existing exemptions in the Wedge and North Slope Historic Districts should be maintained for future districts.
 2. Design guidelines should give weight to the impact of proposed projects to the overall district, and less weight on individual properties.
 3. Design guidelines windows on secondary elevations should be relaxed.

The Planning Commission appreciates the opportunity to review the Landmarks Preservation Commission's recommendations on this application and the feedback and comments received through our review and decision-making process. If you have any questions, please contact Reuben McKnight, Historic Preservation Officer, at rmcknigh@cityoftacoma.org.

Sincerely,



CHRISTOPHER KARNES, Chair
Tacoma Planning Commission



**PROPOSED COLLEGE PARK HISTORIC SPECIAL REVIEW DISTRICT
PLANNING COMMISSION’S FINDINGS AND DECISION REPORT
NOVEMBER 2, 2022**

Organization of Report

1. Summary of Proposal
2. Findings Part 1: Background
3. Findings Part 2: Landmarks Commission Review
4. Findings Part 3: Planning Commission Review
5. Findings Part 4: Public Testimony and Summary of Community Engagement
6. Findings Part 5: Commission Response and Comprehensive Plan Policy Review
7. Findings Part 6: SEPA Review
8. Conclusions
9. Decision
10. Recommendations

1. Summary of Proposal

This proposal, submitted by residents of the College Park Neighborhood in May 2021, would establish a new historic special review district as an overlay zone. The proposed area covers approximately 122 acres extending roughly from North 21st St to the north, to North Pine Street to the east, along North 8th to the south, along the eastern boundary of the University of Puget Sound Campus along Alder Street to the west, and along the northern boundary of the university campus on North 18th Street to North Union Avenue on the west (see map below).



This nomination is submitted and reviewed under the provisions and criteria of Tacoma Municipal Code (TMC) 13.07.060, which requires review by the Tacoma Landmarks Preservation Commission, Planning Commission and, if forwarded by the Planning Commission, approval by City Council.

The district is nominated as an example of a cohesive neighborhood that reflects the broad patterns and history of Tacoma as well as for the distinctive characteristics of its structures, which embody early twentieth century architecture. The proposed district consists of approximately 582 structures, 509 of which are classified as “contributing” in the preliminary building inventory submitted with the nomination package (for the local historic register, accessory structures are not inventoried, and this number reflects only the primary structures on the lot). The district consists primarily of detached residences built prior to World War II, with most constructed between 1910 and 1940 with an average construction date of 1924.

2. Findings Part 1: Background

A. Comprehensive Plan and Land Use Regulatory Code

The *One Tacoma* Comprehensive Plan 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 one of the key regulatory mechanism that supports the Comprehensive Plan.

Specifically, the primary Comprehensive Plan Element relating to historic districts and historic preservation is the Historic Preservation Element of the Comprehensive Plan. Additional relevant language to this proposal is within other chapters of the *One Tacoma* document, including the chapters for Design and Development, Urban Form, Housing and others.

Within TMC Title 13, Chapters 13.05, 13.06, 13.07 and 13.12 provide the basis for historic designations, design review, and environmental review for cultural and historic resources. Specifically, TMC 13.07 outlines the overall criteria and nomination process for historic districts. The relationship between these regulatory code sections is described further in the section titled “Planning Commission Review.”

B. Planning Mandates

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 Environment Policy Act (SEPA);
- The State Shoreline Management Act (SMA);
- The Puget Sound Regional Council's *VISION 2050* Multicounty Planning Policies;
- The Countywide Planning Policies for Pierce County;
- TMC 13.02 concerning the procedures and criteria for amending the Comprehensive Plan and development regulations.

3. Findings Part 2: Landmarks Preservation Commission Review

Pursuant to the Tacoma Municipal Code, Section 13.07.060 – Tacoma Register of Historic Places – Nomination and designation process for Historic Special Review and Conservation Districts, nominations for new local historic special review districts are submitted to the Planning and Development Services Department and forwarded to the Landmarks Preservation Commission for its review. The Commission subsequently determines whether to accept the nomination and adopt a schedule for its review.

For the College Park Historic Special Review District application, the nomination was received by the City on May 3, 2021 and scheduled for its first review by the Landmarks Commission on June 23, 2021. The Commission subsequently formally accepted the nomination for review and adopted its schedule on July 21, 2021, which included meetings to discuss elements of the nomination, including historic designation criteria, boundaries, potential design guidelines, and public information sessions, as follows:

Date	Activity
6/23/21	Introduction of nomination request; discussion of review schedule
7/21/21	Adoption of review schedule; approve public notice of nomination
8/11/21	Review district significance, first public information session
8/25/21	Review proposed boundaries, buildings inventory, design guidelines
9/8/21	Second public information session
10/13/21	Recap of previous discussions; discussion of opinion survey; revise review schedule
10/20/21	Release opinion survey
11/3/21	Survey response deadline
11/10/21	Discuss results of survey; discussion of preliminary recommendations
12/8/21	Discussion of preliminary recommendations
1/12/22	Adopt preliminary recommendations; set hearing date
2/9/22	Public Hearing
2/23/22	Review of hearing testimony; discussion of issues and observations
3/9/22	Discuss findings and recommendations
4/13/22	Adopt Findings and Recommendations

On April 13, 2022, the Landmarks Preservation Commission adopted its Findings and Recommendations, concluding that the proposed district meets the designation criteria for creation of a new historic special review district. Within their recommendations, the Commission recommended:

- Establishing the College Park Historic Special Review District
- Relaxing or reducing regulatory standards for review in any design guidelines that are adopted for the district, particularly pertaining to secondary elevations
- Reviewing the standards and procedures in the municipal code pertaining to historic district creation
- Committing additional resources towards historic district creation in underserved areas of the City.

4. Findings Part 3: Planning Commission Review

Historic district creation requires review by the Planning Commission, prior to review by the City Council. Unlike other zoning amendments, the Planning Commission’s approval is required to establish an historic overlay zone. . The options available to the Planning Commission include 1) recommend approval of the district to City Council, 2) recommend approval with modifications to City Council, or 3) to deny the proposal. If the Planning Commission denies the proposal, the action is final, unless appealed by residents to the City Council (TMC 13.07.060).

The following outlines the primary components of the Planning Commission review process:

- “Each proposal for a new Historic Special Review District or Conservation District and the respective Landmarks Preservation Commission recommendation shall then be considered by the Planning Commission of the City pursuant to the procedures for area-wide zoning in TMC 13.05.030.B.” (TMC 13.07.060.C.1);
- “In making a recommendation to the City Council, the Planning Commission shall consider the conformance or lack of conformance of the proposed designation with the Comprehensive Plan of the City. The Planning Commission may recommend approval of, or approval of with modifications, or deny outright the proposal, and shall promptly notify the Landmarks Preservation Commission of the action taken.” (TMC 13.07.060.C.3);
- “[The Planning Commission shall] review and make recommendations on matters concerning land use and development, including area-wide zoning reclassifications, moratoria, and interim zoning.” (TMC 13.02.040.E);
- “[The Planning Commission shall] work with the Landmarks Preservation Commission, pursuant to TMC 13.07, to designate historic special review districts and conservation districts within the City and to make recommendations to the City Council for establishment of such districts.” (TMC 13.02.040.J); and
- “The Planning Commission shall conduct a public hearing to consider an area-wide zoning reclassification and to determine the consistency of the reclassification with the Comprehensive Plan and its elements and RCW 36.70A.” (TMC 13.05.030.B.9.e);
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To date, the Planning Commission has had 5 meetings regarding College Park, including a Public Hearing on June 1, 2022 and a communication item transmitted on August 3, as follows:

Date	Activity
9/1/21	Planning Commission briefing
5/4/22	Planning Commission review Landmarks Commission recommendation; set hearing date
6/1/22	Planning Commission Public Hearing
8/3/22	Post hearing testimony recap (communication item)
9/7/22	Review and Discussion
10/22 – 11/22 (TBD)	Adopt findings and recommendations/decision

5. Public Testimony and Summary of Community Engagement

A. Summary

There has been extensive public outreach regarding the College Park Proposal, which has involved significant advocacy by the nominators, postcard surveys, email distribution lists, a dedicated website and public information sessions, in addition to two public hearings.

In general, there has been a consistent level of significant public support from residents and property owners directly affected by the proposal, based upon public comments, feedback and surveys.

B. Outreach

Outreach by Supporters

Outreach leading up to the nomination included face to face visits, postcards, social media, and local news coverage. The original submittal contained a petition and a postcard survey, completed by the nominator.

Outreach by the City

Upon receipt of the nomination, the Landmarks Commission established a dedicated website (www.cityoftacoma.org/collegeparkHD) and mailed a postcard to all occupants and taxpayers of record within a 400-foot radius of the district boundaries, announcing two Public Information Sessions and directing interested parties to the website. The Commission also established a College Park Historic District email distribution list that includes 143 recipients. Between June and December 2021, the Commission received over 60 written comments on the College Park proposal.

The Landmarks Commission held 14 meetings to discuss College Park. In addition to its normal meeting schedule, the Commission held 2 public information sessions dedicated to College Park, on August 11 and September 8, 2021.

On October 10, 2021, the Commission released an opinion survey online and in post card format. The survey was sent to the email distribution list, posted online, and mailed to over 1300 addresses, representing taxpayers of record and occupants of addresses within a 400-foot radius of the proposed district. By the November 3 deadline, 340 responses were received.

C. Public Hearings

Public Hearing – Phase 1

On February 9, 2022, the Landmarks Commission held a public hearing and received 60 comments. Notice was mailed to taxpayers of record and occupants within 400 feet of the proposed district boundaries, sent via email distribution list, posted online and in social media, and published in The News Tribune on February 2, 2022.

Following the hearing, the Landmarks Commission voted 5-1 to adopt its Findings and Recommendations and forward these to the Planning Commission.

Public Hearing – Phase 2

On June 1, 2022, the Planning Commission held a Public Hearing to receive public comment on the Landmarks Commission recommendation. Staff also conducted a virtual Public Information session on May 26, 2022 ahead of the hearing.

Per the Planning Commission's requirements, the following notices were sent:

1. **Public Notices** – The notice for the public hearing and the informational meeting was mailed during the week of May 9, 2022, to approximately 7,000 individuals and entities within and within 2,500 feet of the proposed district boundaries. The notice was also e-mailed to more than 100 individuals on the Landmarks Preservation Commission's College Park distribution list and to more than 900 individuals on the Planning Commission's distribution list.
2. **News/Social Media** – The City of Tacoma issued a News Release on May 24, 2022. An online advertisement was placed in The News Tribune on May 20, 2022. A legal notice concerning the environmental determination, the public hearing and the informational meeting was placed in the Tacoma Daily Index on May 20, 2022. An event page for each of the public hearings and the informational meeting was posted on the City's Facebook, starting the week of May 24.
3. **Public Signs** – Three signs were installed (per TMC 13.05.070.J.4) on May 23, 2022 at the following locations within the subject area: N. Union Ave. at N. 18th St., N. 21st St. at N. Lawrence St., and N. Alder St. at N. 8th St.
4. **60-Day Notice** – A notice was sent to the Joint Base Lewis-McChord (per RCW 36.70A.530(4)) on May 18, 2022, asking for comments within 60 days of receipt of the notice. No comments were received.
5. **Tribal Consultation** – A letter was sent to the chairman of the Puyallup Tribe of Indians on May 18, 2022 to formally invite the Tribe's consultation. No comments were received.
6. **Takings Review** – A request was sent to the City Attorney's Office, seeking legal opinions on whether the proposed College Park Historic District might result in an unconstitutional taking of private property (pursuant to RCW 36.70A.370). Upon review conducted in accordance with the standards recommended by the Washington State Attorney General, the City Attorney's Office concluded, on May 19, 2022, that the proposal would not constitute a taking.

The Planning Commission was provided with the full Comment Record and staff responses in the meeting packet for the August 3 Planning Commission meeting.

There was a total of 107 comments received during the hearing and comment period, including 17 oral comments and 90 written comments. Approximately 69% of comments received were in support of the district, whereas approximately 31% of the comments were in opposition.

This approximate level of support is consistent with the Public Hearing conducted by the Landmarks Commission on February 9, 2022, in which approximately 67% of the comments favored the creation of the historic district.

Among supportive comments, the most common broad themes included:

- The proposed district is historically significant
- It is important to protect the look/feel/charm of the neighborhood

- The creation of historic districts is supported by the Comprehensive Plan
- It is possible to create historic districts and achieve density/housing goals, and that the proposal is compatible with Home In Tacoma.

Among opposing comments, the most common themes included:

- It will have negative effects on future development, including housing supply and cost
- It is inconsistent with policy goals of equity and inclusion
- It will have negative impacts on property rights and result in increased costs to homeowners

6. Findings Part 5: Commission Response and Policy Review

During its discussions of the College Park Historic District, the Planning Commission members raised issues related to multiple policy areas in the Comprehensive Plan and City Council Policies. The primary issues are grouped into the following categories:

- Whether the historic district is compatible with housing goals for the City, including Home In Tacoma, and its effect on efforts to increase housing supply and to reduce barriers to housing, including cost.
- Whether the historic district is consistent with policy objectives regarding sustainability, including sustainable development and green infrastructure (such as EV charging stations and solar panels).
- Whether the proposal is consistent with City policies regarding diversity, equity and inclusion; specifically, whether the proposal supports the City’s efforts to achieve equitable outcomes citywide, and whether the proposal continues or memorializes racist legacies such as redlining.
- Whether the district creates a burden for members of the community in terms of costs of design review and district requirements.
- Members of the Commission also noted that the area does appear to have historic and architectural character, and the visual qualities of an early 20th century residential neighborhood. Central to the discussion is whether the proposal, as a historic conservation tool, is consistent with the Design and Development, Urban Form and Historic Preservation policies of the Comprehensive Plan.

A. Compatibility with Housing Goals

The Commission finds that the proposed historic district is not compatible with housing goals for the City, including Home In Tacoma, and could have a countering effect on efforts to increase housing supply and to reduce barriers to housing.

1. The Home In Tacoma amendments are a key tool for improving outcomes and addressing our region’s critical housing needs. However, policies adopted under Home In Tacoma have not yet been implemented through Phase 2 zoning and code amendments, and thus, it is difficult to fully gauge the effect of the College Park Historic District proposal on those efforts. The Commission believes that creating the historic district overlay at this critical time is therefore inappropriate.
2. The Commission also finds that the anticipated effect of this new local historic district would have some limiting effect on housing development. This is counter to the Council’s adopted Housing policies which call for utilizing tools, including zoning, to help improve housing

supply, affordability and choice by facilitating more flexibility for infill housing and additional density throughout the City's neighborhoods, including traditionally single-family areas.

3. Home in Tacoma Phase 2 will be implementing zoning and development regulation updates that will seek to remove barriers and promote more equitable access to housing. Phase 2 of Home in Tacoma is occurring concurrently with the College Park Historic District review, so it is difficult to say with certainty how the two proposals may ultimately interact. Historic Districts are an overlay zone that affect the design and development of new housing. The types of housing allowed are generally determined by the underlying base zone. However, the cited policy directs the city to work affirmatively to remove disparities in housing access and it is possible that the cumulative effect of multiple historic districts within lower density, and higher opportunity neighborhoods, could reinforce existing disparities.
4. The Commission finds that the College Park Historic Overlay would likely reinforce, or could increase, existing disparities. Citywide, historical exclusion through zoning, redlining, exclusionary covenants (note: no exclusionary covenants are known to have existed in the College Park neighborhood), and other racist practices have denied generations of people from fair access to housing on the basis of race and wealth. This has resulted in many groups being denied opportunities for wealth building, equitable access to schools and other services, and other negative legacy effects. The City of Tacoma is committed to enacting zoning and other policies that reverse this legacy, and to carefully consider the effects of new proposals on existing disparities.
5. The *One Tacoma* Plan's Transportation Element encourages the integration of land use planning and transportation, including policies, regulations and definitions that support Transit Oriented Development through moderate to high density housing, affordable housing, pedestrian connectivity, access to multiple modes of transportation and others, within proximity to transit priority streets defined in the Transportation Master Plan. The College Park Historic Overlay would be within proximity to several transit priority streets. This set of policies, definitions, and designation of streets to intensify use and encourage development of compact, mixed-use structures with moderate to high density housing with affordable housing for all income groups, presents a substantially different outcome from the proposed College Park Historic District overlay, which would generally preserve architectural elements of single-family dwellings. Specifically, the recommendation from the Landmarks Commission to require that "Demolition of structures and new construction within the district [to be] subject to Landmarks Commission approval" may be at odds with the intent of the *One Tacoma* Plan to encourage development around transit within, immediately abutting, or within a walking-distance buffer of the proposed district boundary. The proposal seeks to place regulation of "all exterior alterations and construction within the historic and conservation district boundaries, including alterations to elements and spaces within the public rights-of-way, are subject to the review and approval of the Landmarks Preservation Commission." This would potentially be a barrier to implementation of transit infrastructure in public rights of way, which is not proposed to be exempted from Landmarks Preservation Commission approval.

B. Compatibility with Sustainability Goals.

The Commission finds that the historic district proposal is generally consistent with policy objectives regarding sustainability, particularly through its emphasis on adaptive reuse. However, the historic district design review requirements could complicate efforts of

community members to install alternative energy sources, such as solar panels, and other green infrastructure, as well as retrofitting poorly insulated homes.

1. Adaptive reuse is one of the core tenets of historic preservation. Construction is one of the highest sources of waste stream debris, as well as the environmental costs related to new materials and transport. An historic district strongly encourages reuse of existing buildings, and the term “adaptive” anticipates that new uses, including conversions to higher occupancy, will occur.
2. The Commission recognizes that solar panels, heat pumps and other related improvements are generally allowed with design review in residential historic districts. The Commission also understands that other items such as window replacements can be a point of contention. The Landmarks Commission recommendation (discussed further below) suggests that a reconsideration of window requirements and other related items may be appropriate if the district were to be created. The Planning Commission believes that removing barriers to green infrastructure and retrofitting should be reduced wherever possible, and that while adaptive reuse is an important green development strategy, historic preservation guidelines and regulations should support retrofitting older buildings to maximize operational energy efficiency.

C. Compatibility with Development Objectives/Cost/Burden

The Commission finds that the proposed district will create some burden for affected members of the community resulting from the fees and the process of going through design review.

1. According to the City, direct cost recovery for historic design review through permit fees is below ten percent. The Commission would encourage the City to consider generally, for historic design review, whether the need for the revenue justifies the impacts to applicants, noting that for residential historic districts, the design review requirement is tied with permit requirements.

D. Compatibility with Equity Policies

The Commission finds that the proposal is not consistent with City policies regarding diversity, equity and inclusion; specifically, that the proposal does not support the City’s efforts to achieve equitable outcomes citywide.

1. The Commission is concerned that this proposal could perpetuate existing inequities and the legacy of redlining and other historical discriminatory practices. In its statement to the Planning Commission, the Office of Equity and Human Rights noted that while the Landmarks Commission recommendation notes historic disparities between different areas of the city, it did not make specific recommendations for addressing them. The report also states that the College Park proposal “will increase the disparities between communities rather than redress and further widens the gap of equity in our service to historically marginalized communities.”
2. The Commission believes that when examining a proposal such as College Park and historical social outcomes, it is important to not only consider how a neighborhood may or

may not have benefitted from practices such as redlining, but to also evaluate the effects and impacts to those groups who were historically excluded.

3. The Commission appreciates the statement on redlining that was added to the nomination narrative, but also notes that it has little effect on practical outcomes that may result from a new historic overlay district.

E. Design Development, Urban Form and Historic Preservation Policies.

The Commission finds that the College Park Historic District proposal is generally consistent with the Design and Development, Urban Form and Historic Preservation policies of the Comprehensive Plan. While the Planning Commission generally defers to the Landmarks Preservation Commission on matters of evaluating historical significance, the Planning Commission does not believe the case has been made that the College Park Neighborhood stands out from the surrounding built environment in a way that is significant.

1. There are many policies regarding design, urban form and preservation within the Comprehensive Plan. Specifically, the Historic Preservation Element directly addresses and provides guidance to the City regarding historic preservation matters and provides the basis for the regulatory code used by the Landmarks Commission for review of nominations and design review decisions.
2. The Landmarks Preservation Commission has recommended, following its review of the College Park Historic District, establishing a local historic overlay zone based on its criteria in TMC 13.07, finding that the district met the significance criteria and that the boundaries were appropriate.
3. The Planning Commission generally defers determination of historical significance to the Landmarks Commission and does not object to the determination of historical significance made by the Landmarks Commission. However, the Planning Commission also observes that certain criteria are vague, such as that which determines boundaries. TMC 13.07.040.C.3 states that “The boundaries of Historic Special Review Districts and Conservation Districts should be based upon a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects or by documented differences in patterns of historic development or associations.” What is distinct about the College Park neighborhood that sets it apart from the surrounding residential area? Could the district be larger? Should it be smaller? The Planning Commission does not see a strong case having been made to demonstrate why the boundaries are set where they are, aside from the existing boundaries of the National Register District.
4. Historic preservation policies encourage integrating historic preservation into other community planning efforts. The Planning Commission believes that a more integrated approach could address some of the issues raised during the review of this proposal, including tensions between preservation and housing, equity and other concerns. This could also allow for earlier review and input by reviewers and stakeholders, including the Planning Commission and Office of Equity and Human Rights, among others.

5. The Planning Commission believes that examples of historic residential neighborhoods are already well represented and protected in the North End, particularly by the North Slope Historic District.
6. The Landmarks Commission recommendation included support for a review of the policies, code and process for review of historic districts, and the Planning Commission concurs with this recommendation. The Historic Preservation Comprehensive Plan Element was last updated in 2010, and is not aligned with current City policy regarding housing, equity, sustainability and other critical policy areas. Moreover, for historic district review, the process relationship and respective roles of the Landmarks, Planning Commission and City Council should be clarified and made consistent with the review process for other similar land use policy areas.

7. Findings Part 6: SEPA Review

Pursuant to Washington Administrative Code (WAC) 197-11 and Tacoma's SEPA procedures, a Preliminary Determination of Environmental Nonsignificance was issued on April 19, 2019 (SEPA File Number LU22-0086), based upon a review of an environmental checklist. No comments were received by the deadline of June 3, 2022. The preliminary determination became final on June 10, 2022. The environmental review was included in the Public Review Document.

8. Conclusions

- A. Tacoma Municipal Code 13.07.060 directs the Planning Commission to “consider the conformance or lack of conformance of the proposed designation with the Comprehensive Plan of the City. The Planning Commission may recommend approval of, or approval of with modifications, or deny outright the proposal, and shall promptly notify the Landmarks Preservation Commission of the action taken.”
- B. The proposal has been reviewed with the required public process and notification.
- C. The submittal was consistent with the applicable City codes and regulations, particularly TMC 13.07 regarding the nomination of historic districts.
- D. The proposal is consistent with many of the design, urban form and preservation policies outlined in the Comprehensive Plan; however, there are significant concerns regarding the compatibility of this proposal with the City’s housing and equity goals and policies.

9. Decision

- A. Pursuant to Tacoma Municipal Code 13.07.060, the Planning Commission denies the application to establish the College Park Historic Special Review District.

10. Recommendations

- A. The Planning Commission recommends that Comprehensive Plan policies and regulatory code relating to historic districts be reviewed and amended at the earliest appropriate amendment cycle, to include review of consistencies between historic preservation policies and policies elsewhere in the Comprehensive Plan relating to housing, equity, and sustainability.
- B. The Planning Commission concurs with the Landmarks Preservation Commission recommendation for a review of the code that outlines the historic district designation process,

to improve understanding of the respective roles of each commission, and City Council, and to align the process with other similar land use policy reviews.

- C. The Planning Commission recommends reviewing the utility of fees for design review for properties on the Tacoma Register of Historic Places, including those within locally designated historic districts and individual City Landmarks; particularly if the value to the City is appropriately balanced with the impact to community members.
- D. For future local historic district proposals, the Planning Commission concurs with the Landmarks Preservation Commission's recommendation to reduce the burden on property owners and residents within local historic districts by relaxing or reducing design review requirements, including:
 - 1. Alterations to non-visible elevations should be exempted from the historic district design review requirements. Other exemptions consistent with the existing exemptions in the Wedge and North Slope Historic Districts should be maintained for future districts.
 - 2. Design guidelines should give weight to the impact of proposed projects to the overall district, and less weight on individual properties.
 - 3. Design guidelines windows on secondary elevations should be relaxed.