

# ONE TACOMA

A Comprehensive Plan  
for a Vibrant, Connected,  
and Sustainable City

Historic Preservation Baseline Conditions Report | **DRAFT**  
September 2024

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# 1 INTRODUCTION

Architectural Resources Group (ARG) has prepared this memorandum to provide an overview of the City of Tacoma's policies and regulations regarding historic properties and lay the groundwork for historic preservation considerations in the 2024 Comprehensive Plan Update. Accordingly, the second half of this memo summarizes identified deficiencies in the existing policies and regulations and preliminarily maps out ways these deficiencies could be addressed.

## Historic Resources in Tacoma

The City of Tacoma maintains the Tacoma Register of Historic Places (TRHP), which includes individually registered City Landmarks in addition to Historic Districts and Conservation Districts. The Tacoma Register includes approximately 190 City Landmarks, including residential, commercial, institutional, and industrial properties with construction dates ranging from the 1840s to 1950s. Many of these properties are also listed on the Washington Heritage Register (WHR) and/or the National Register of Historic Places (NRHP). Landmarks are located across the city but are clustered in Downtown Tacoma, Central Tacoma, and the North Slope, areas of the city with the highest concentration of older building stock. See a map of historic resources in Exhibit 1.

In addition to individual landmarks, the Tacoma Register includes four historic districts, two of which are also conservation districts:

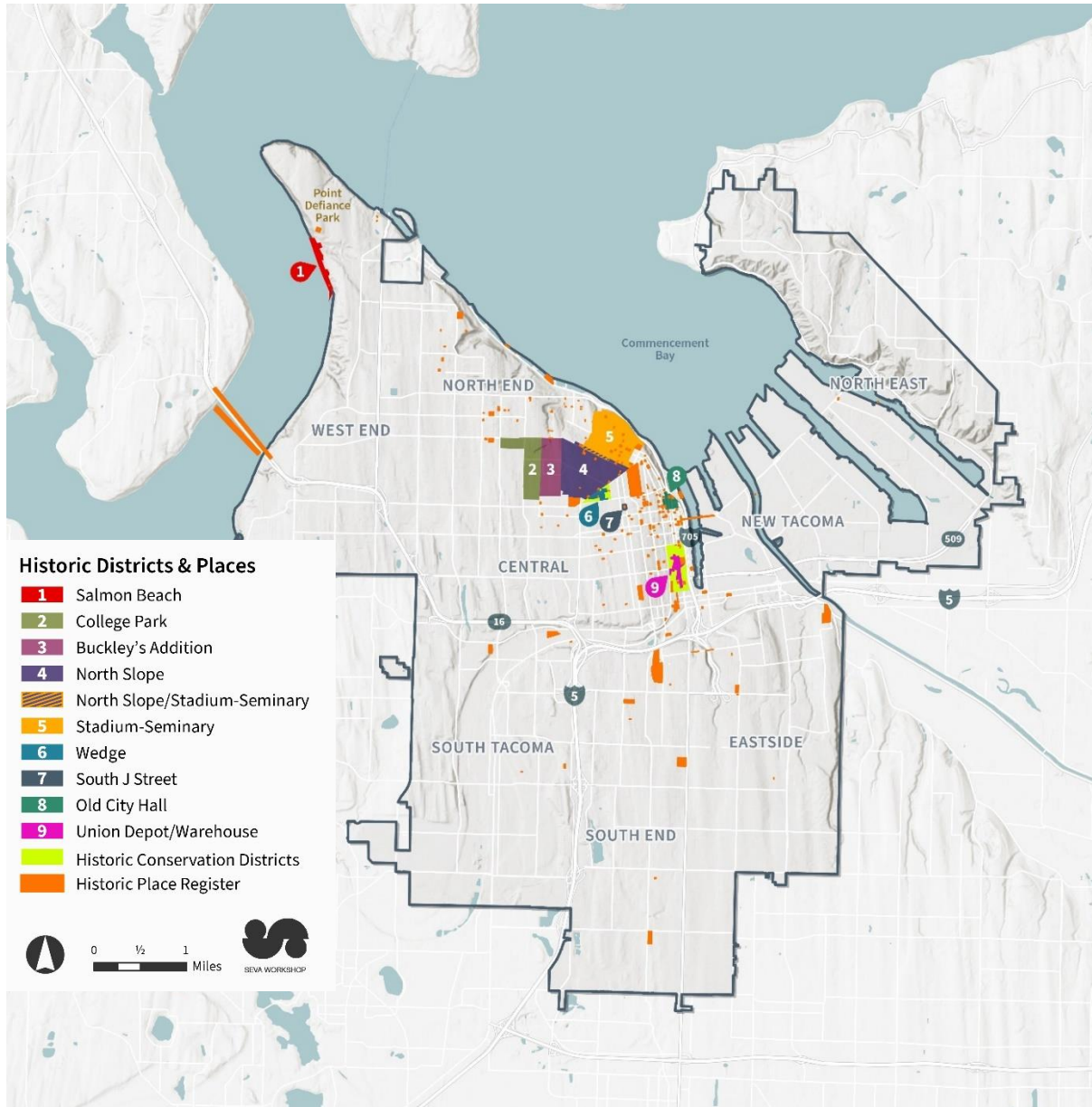
- Old City Hall Historic District
- North Slope Historic District
- Union Depot/Warehouse Historic District and Union Station Conservation District
- Wedge Neighborhood Historic and Conservation Districts

Eight historic districts are, including the four Tacoma Register districts, are listed on the Washington Heritage Register:

- Buckley's Addition Historic District
- College Park Historic District
- North Slope Historic District
- Old City Hall Historic District
- Salmon Beach Historic District
- South J Street Historic District
- Union Depot/Warehouse Historic District and Union Station Conservation District
- Wedge Neighborhood Historic and Conservation Districts

All but one of these eight districts (Salmon Beach) are also listed on the National Register of Historic Places.<sup>1</sup>

**Exhibit 1: Tacoma Historic Resources Inventory, 2024.**



Sources: City of Tacoma, 2023; Seva Workshop, 2024.

<sup>1</sup> Additional information regarding the properties on the Tacoma Register of Historic Places is available in Zoe Scuderi, “2021 Report on Tacoma Register of Historic Places Index,” Tacoma Department of Planning and Development Services, Office of Long-range Planning, 2021-22.

# 2 TACOMA'S HISTORIC PRESERVATION PROGRAM

## 2.1 Summary of Historic Preservation Plan

Tacoma's Historic Preservation Plan (HP Plan) was adopted in 2011 and replaced the Culture and History element from the prior Comprehensive Plan. As a programmatic element in Book 2 of the existing Comprehensive Plan, the HP Plan defines the City of Tacoma's preservation goals, policies and actions for preservation and neighborhood conservation. It also provides a framework for organizations engaged in community-based initiatives with interests in protecting and experiencing cultural resources. In addition to an Executive Summary, the HP Plan is divided into five sections, each of which is described below.

### Introduction

The Introduction to the HP Plan offers some general background on historic preservation, and, in particular, describes how historic preservation can foster cultural/social sustainability (by promoting social interaction and fostering retention of communities' cultural traditions and social fabric), environmental sustainability (through retention of materials and conservation of energy embodied in existing buildings), and economic sustainability (through higher property values, support for local businesses and trades, and increased heritage tourism).

The Introduction also includes a "Vision Statement for Historic Preservation in 2020," which identifies nine aspirational characteristics for Tacoma's Historic Preservation Program:

- Historic resources are integral to the city's overall goals and objectives.
- Historic resources convey the humanity of Tacoma.
- Historic resources are key to the city's sustainability initiatives.
- A network of individuals and organizations supports Historic Preservation throughout the community.
- Historic Preservation is "horizontally integrated" into planning efforts.
- The City's Historic Preservation program is readily accessible.
- Historic Preservation looks forward while valuing the past.
- Historic preservation is solution oriented.
- The preservation program guides treatment of historic resources.

## Chapter 1: Historic Resources

Chapter 1 of the HP Plan provides a brief summary of historic resources in Tacoma, including a synopsis of the local preservation movement, a description of historic property types and a summary of the city's existing historic landmarks and districts. Chapter 1 includes summaries of three over-arching historical themes that are important to understanding many of Tacoma's historic resources: Native American settlement, Early European settlement, and transportation development. The chapter also points to more general themes (community development, social institutions and movements, political themes, cultural themes, and economic themes) that provide an understanding of Tacoma's historic development.

Chapter 1 also separates Tacoma's historic property types into industrial resources, commercial resources, residential resources, civic and religious resources, and mid-century resources, and describes examples and common characteristics of each type. Finally, Chapter 1 provides an overview of Tacoma's currently designated landmarks, historic districts, and conservation districts.

## Chapter 2: Program Components

Chapter 2 of the HP Plan describes how Tacoma's preservation program works and is broken into six sections: Administration, Identification, Management Tools, Incentives and Benefits, Education, and Advocacy. Each section closes with a summary of known issues or areas for growth associated with that program component.

- The *Administration* section describes the responsibilities of the City's Historic Preservation Office.
- The *Identification* section describes how properties are surveyed and designated, including a discussion of how historic contexts and surveys inform significance evaluations, and a summary of the City's historic resource listing process. The section also summarizes previously completed historic resource surveys.
- The *Management Tools* section describes specific mechanisms for protecting historic resources and, as such, summarizes relevant portions of Tacoma's Municipal Code, including the zoning code, building code, demolition regulations and, most notably, the design review process.
- The *Incentives and Benefits* section describes programs that seek to stimulate investment in historic properties, including the Federal Rehabilitation Tax Credit Program, the Washington State Special Tax Valuation, the Pierce County/City of Tacoma Current Use Assessment, the City of Tacoma Tax Incentive for Multi Family Housing, and City of Tacoma Zoning Incentives (such height bonuses or parking requirement waivers).
- The *Education* section describes tools, such as a yearly events calendar or preservation month activities, that can strengthen the preservation program by helping to build community awareness and expertise.

- Finally, the *Advocacy* section summarizes partnerships that support preservation, identifying categories of local preservation partners; state, regional and national preservation partners; and potential preservation partners.

## Chapter 3: Program Goals

Chapter 3 of the HP Plan lays out goals, policies, and actions for historic preservation in Tacoma. These include a collection of overall goals, policies and actions, along with goals, policies, and actions for each of the six program components (Administration, Identification, Management Tools, Incentives and Benefits, Education, and Advocacy) identified in Chapter 2.

Within each section, *Goals* summarize the desired outcome at the highest level (e.g. “A livable community with a strong sense of history”), *Policies* addressing one aspect of that goal (e.g., “Integrate Tacoma’s historic resources into community planning efforts”), and *Actions* describe specific, achievable tasks against which success can be measured (e.g., “Encourage neighborhood-level preservation and conservation programs”). Both overall and project component goals are summarized below.

### *Overall*

- A Livable Community With a Strong Sense of History
- A Sustainable Community Supported by Preservation Efforts
- An Economically Vibrant Community Supported by Preservation Activities
- Tacoma’s Preservation Program Employs Nationally Recognized Best Practices
- Preservation is Integral to Other Community Goals and Policies
- Historic Resources are Integral Features of the Public Realm

### *Administration*

- The City Maintains a Functional, Integrated Preservation Program

### *Identification*

- A Detailed Understanding of Tacoma’s History Provides a Base for Preservation Efforts
- Historic Survey Information Supports All Program Components

### *Management Tools*

- Historic Resources are Protected from Demolition
- Clear and Complete Ordinances Guide the Preservation Program
- The City’s Project Review and Enforcement Programs Promote Preservation Objectives
- Resource Designation Categories Indicate Priorities for Conservation of Resources
- The Desired Character of Traditional Areas of the City is Maintained

### *Incentives and Benefits*

- A Coordinated System of Incentives and Benefits Stimulates Preservation and Conservation in Tacoma

#### *Education*

- The Public Appreciates Tacoma’s Diverse History and Its Historic Resources
- Practical Education Programs Support Historic Preservation

#### *Advocacy*

- Community Organizations are Strong Advocates for Historic Preservation
- City Departments Collaborate to Promote Historic Preservation

## **Chapter 4: Implementation**

The final chapter of the HP Plan identifies and sequences actions to reach the Plan’s stated preservation goals. The chapter links to a prioritized, 10-year implementation table that maps out when each of the Actions identified in Chapter 3 of the plan were anticipated to be completed.

## **2.2 Summary of Relevant Code Sections**

A series of regulations in Tacoma’s Municipal Code (TMC) establish the basic rules for construction related to historic resources and set forth the process for establishing protections for these resources. The most relevant chapters are summarized in this section, in the order in which they appear in the code. In some cases, additional detail regarding code language is provided in Section 2B of this report.

### **Chapter 1.37 Transfer of Development Rights**

The Transfer of Development Rights (TDR) Administrative Code establishes procedures for the operation of the City’s TDR Program. The TDR Program is designed to advance the goals of the State’s Growth Management Act by providing a tool to advance the City’s conservation goals, historical preservation goals, and built environment goals by encouraging the voluntary redirection of development potential away from areas where the City wants less or no development potential, called “sending areas,” toward areas that the City has designated as suitable for bonus development potential, called “receiving areas.”

### **Chapter 1.42 Landmarks Preservation Commission**

Chapter 1.42 identifies the composition, powers and duties of the Landmarks Preservation Commission (LPC). The primary duties of the LPC are to identify and actively encourage the conservation of the City’s historic resources by establishing and maintaining a register of historic landmarks, landmark sites, historic special review districts, and conservation districts; review proposed changes to register properties; raise community awareness of



the City's history and historic resources; and serve as the City's primary resource in matters of history, historic planning, and preservation.

Chapter 1.42 also specifies that the Director of the Planning and Development Services Department shall appoint a Historic Preservation Officer to serve as the primary staff contact to the LPC and carry out myriad other duties in support of the LPC's purpose.

## **Chapter 8.35 Neglect of Historic Properties**

Chapter 8.35 lays out administrative procedures designed to encourage property owners to maintain historically designated properties such that they do not deteriorate to the extent that the only option to abate the health and safety risks caused by such deterioration is demolition. These procedures are restricted to (1) properties individually listed on the Tacoma Register of Historic Places and the National Register of Historic Places, and (2) contributing properties, excluding residential structures containing four or less units, within in Historic Special Review Overlay Zones and National Register Historic Districts. Chapter 8.35 specifies the deteriorated conditions that establish a property as a "neglected historic property" and describes the penalties and enforcement associated with such a classification.

### **Subsection 13.05.010A Historic Conditional Use Permits**

Subsection 13.05.010A describes the conditional use permit process, which is intended for uses that may be appropriate in a given zone but because of their size, operating characteristics, potential off-site impacts and/or other similar reasons warrant special review on a case-by-case basis. In particular, this subsection establishes that for proposals that affect properties that are listed individually on the Tacoma Register of Historic Places, or are within historic special review or conservation districts, the use shall be compatible and consistent with applicable historic preservation standards, along with goals, objectives and guidelines of the historic or conservation districts. The subsection also specifies multiple criteria that must be met to obtain a conditional use permit for the reuse of a historic structure or site, including that the proposed reuse and design of any modifications to the historic structure(s) and site shall be approved by the Landmarks Preservation Commission.

### **13.05.040 Historic Preservation Land Use Decisions**

Section 13.050.040 specifies the regulatory procedures for historic preservation decision making bodies. This includes summaries of the relevant authority and responsibilities of the Landmarks Preservation Commission and the Historic Preservation Officer. In addition, this section lays out the Certificate of Approval process, including what types of proposed modifications to a historic property require a Certificate of Approval, the Certificate application requirements, and the review process, including the appeals process. The section also describes how an applicant may submit a claim of economic hardship in cases

where a Certificate of Appropriateness has been denied, and the application requirements and review process when applying to demolish a city landmark.

## Chapter 13.06 Zoning

As the city's zoning code, Chapter 13.06 provides the basic regulations that shape development

throughout Tacoma, including defining permitted uses and densities and dimensional limits such as setbacks and building heights. The zoning code identifies several base zone categories (such as residential, commercial, industrial, etc.) along with a series of overlay zones. Subsection 13.06.070E describes the purposes of the Historic Special Review Overlay District. Other portions of the chapter with special relevance to historic preservation include:

- Detailed rules regarding height bonuses associated with projects involving historic properties, such as retention of a city landmark adjacent to new construction or voluntary designation of a building on the Tacoma Register of Historic Places
- Regulations pertaining to live/work units
- Parking requirements, from which historic properties are generally exempt

## Chapter 13.07 Landmarks and Historic Special Review Districts Code

The Landmarks and Historic Special Review Districts Code establishes the Tacoma Register of Historic Places and describes procedures related to the Register, including: nomination and designation to the Register; rescission of landmark designation; the certificate of appropriateness process; review criteria for relocation or demolition of a city landmark; and eligibility for special tax valuation.

### REGISTER ELIGIBILITY

A property that is at least 50 years old and retains sufficient integrity to convey its significance may be designated to the Tacoma Register of Historic Places if it:

- a. Is associated with events that have made a significant contribution to the broad patterns of our history; or
- b. Is associated with the lives of persons significant in our past; or
- c. Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; or
- d. Has yielded or may be likely to yield, information important in prehistory or history; or
- e. Abuts a property that is already listed on the Tacoma Register of Historic Places and was constructed within the period of significance of the adjacent structure; or
- f. Is already individually listed on the National Register of Historic Places; or

- g. Owing to its unique location or singular physical characteristics, represents an established and familiar visual feature of the neighborhood or City.

## **CERTIFICATE OF APPROPRIATENESS**

While most regulations related to the Certificate of Appropriateness process are included in Section 13.05.040, language in Chapter 13.07 establishes that the relevant standards for the Landmarks Preservation Commission in reviewing a Certificate request are the Secretary of the Interior’s Guidelines for the Treatment of Historic Properties.

The chapter also identifies regulations applicable to the city’s Historic Special Review Districts and Conservation Districts, including:

- Old City Hall Historic Special Review District
- Union Depot/Warehouse Historic Special Review District
- Union Station Conservation District
- North Slope Historic Special Review District
- Wedge Neighborhood Historic Special Review District
- Wedge Neighborhood Conservation Special Review District

## **Section 13.12.570 Cultural Resources**

Section 13.12.570 of the Environmental Code sets forth provisions for addressing archaeological, cultural, and historic resources for projects located within the Downtown Tacoma Regional Growth Center and within the Tacoma Mall Neighborhood Regional Growth Center in areas where a Subarea Plan and a companion area-wide, non-project Environmental Impact Statement (“EIS”) have been completed. These provisions include assessment requirements and cultural resource management plan requirements.

This section also sets forth provisions for review of demolition permits that affect structures that are 50 years of age or greater at the time of permit application, and that involve demolition of 4,000 gross square feet or more on a parcel, or are located within a designated Mixed Use Center, or are properties listed on the National Register of Historic Places either as part of a district or individually listed.

## **2.3 Local Historic Overlay District Moratorium**

On April 23, 2024, Tacoma City Council passed Amended Ordinance 28962 establishing a temporary moratorium on the consideration and creation of new local historic overlay districts in residential areas, for a period of one year. This moratorium applies to areas of Tacoma with the land use designations of Low-Scale Residential, Mid-Scale Residential, High-Density Multifamily, or Airport Compatibility Residential. The moratorium does not apply to existing historic districts, nor does it affect National Register nominations or nominations of individual properties to the Tacoma Register of Historic Places.

The moratorium was enacted in response to a series of policy and code issues raised by the Landmarks Preservation Commission (LPC) and the Planning Commission regarding the historic district nomination process. The Planning Commission recommended that these issues be addressed (1) as part of the Comprehensive Plan Update and (2) prior to the establishment of any new districts.

Specifically, the LPC's formal recommendations included:

- The Historic Comprehensive Plan Element and associated regulatory codes should be reviewed during the next code and policy amendment process to assess and evaluate compatibility with the broad City policy of objectives concerning diversity, equity and inclusion, to identify barriers, gaps in preservation policy, and criteria used by the Commission, and to identify additional tools and incentives for owners and residents of historic properties.
- A review of the historic district designation process should be conducted to clarify the roles and scope of the review by the Landmarks Commission and Planning Commission, and to improve coordination between the two processes.
- The City should identify additional resources to support researching and proactive creation of historic districts and designation of historic buildings, especially in areas that are underserved by historic preservation, in order to improve familiarity with and access to historic preservation land use tools, promote investment in older neighborhoods, and celebrate neighborhood identity and enhance quality of life.<sup>2</sup>

The Planning Commission made the following recommendations:

- Comprehensive Plan policies and regulatory code relating to historic districts should 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 concurred 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 utility of fees for design review for properties on the Tacoma Register of Historic Places should be reviewed, 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 concurred with the Landmarks Preservation Commission's recommendation to reduce the burden

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<sup>2</sup> The LPC recommended these unresolved policy and code issues be addressed without placing a temporary moratorium on new district listings.

on property owners and residents within local historic districts by relaxing or reducing design review requirements.

## 2.4 Identified Issues/Deficiencies

The following summary of known issues is intended to lay the groundwork for the historic preservation-related components of the Comprehensive Plan Update. The historic preservation scope of the Plan Update entails revisiting and reshaping the Historic Preservation Plan to remove redundancies and inconsistencies, while adding important missing content. We describe the general recommended approach in Section 2A below, followed by a discussion of specific policies and/or regulations that could be changed to clarify City processes and priorities regarding the designation and regulation of historic resources.

### 2A. Reformat Historic Preservation Plan

Tacoma’s Historic Preservation Plan defines the City’s preservation goals, policies and actions for preservation and neighborhood conservation. As currently structured, however, the HP Plan includes extensive background information that, instead of being part of the Comprehensive Plan itself, may be more suitable as part of an ever-evolving public reference document that is managed and made available by the Planning Department.

#### GUIDE TO HISTORIC PRESERVATION IN TACOMA

We recommend that the portions of the HP Plan other than Chapter 3 (Program Goals) be reformulated as the “Guide to Historic Preservation in Tacoma,” a reference manual for both City staff and the public regarding the City’s historic preservation program. The existing City document “Nominating a Property to the Tacoma Register of Historic Places” could be incorporated into this reference manual as well. Repackaging the existing content in this way would enable the wide variety of reference information that is currently in the HP Plan to be regularly updated outside of the formal Plan Amendment process. Potential updates in support of this transformation that pertain to specific chapters of the HP Plan are summarized below.

#### EXECUTIVE SUMMARY

- The section “A Vision for Historic Preservation in 2020” (p. III) should be removed or updated.
- If there is desire to keep them, the summaries of goals and policies by program area (pp. IV-XI) will need to be updated to reflect any changes to the goals and policies of the HP plan element.

## INTRODUCTION

- The “Historic Preservation and Sustainability” section (pp. IN-5 to IN-9) should potentially be broken out as its own chapter, given the importance of its themes. Regardless, this section should be reviewed for potential added discussion of the City’s goals regarding housing, resiliency, and diversity, equity, and inclusion (DEI).
- The section “A Vision for Historic Preservation in 2020” (pp. IN-10 to IN-11) should be removed or updated.

## CHAPTER 1: HISTORIC RESOURCES

- The narrative in the section entitled “The Preservation Movement in Tacoma” (pp. 1-1 to 1-2) ends in 1985 and would benefit from at minimum a one- to two-paragraph description of preservation trends and milestones over the past four decades.
- The section “Historic Themes and Topics” (pp. 1-3 to 1-8) discusses three overarching historical themes that are important to understanding many of Tacoma’s historic resources: Native American settlement, Early European settlement, and transportation development. This section may warrant expansion to address additional themes. Alternatively, discussion of historical themes could be moved to a separate “historic contexts” document, which could be extensively expanded in the future and managed by the City as separate references.
- Given the recent recognition of the importance of encouraging the documentation and designation of nontraditional historic properties, properties that are primarily significant for their cultural association, rather than architectural distinction, could be specifically called out as a category in the “Historic Property Types” section (pp. 1-9 to 1-12).
- The statistics in the “Existing Landmarks and Districts” section (pp. 1-13 to 1-16) should be reviewed for accuracy – the number of City Landmarks, for example, needs updating. Similarly, the district discussion does not mention the Wedge Neighborhood Historic District.
- The maps at the end of the chapter (pp. 1-18 to 1-19) should be updated to reflect designations that have occurred in the last decade.

## CHAPTER 2: PROGRAM COMPONENTS

- The description of completed surveys in the “Identification” section (pp. 2-14 to 2-16), including the map and chart, should be updated to include surveys completed (or started) since adoption of the HP Plan.
- The various programs referenced in the “Education” section (pp. 2-35 to 2-40) should be vetted to identify any that are no longer pertinent or additional programs, such as the Black Heritage Survey, that should be added.
- The bulk of the “Advocacy” section (pp. 2-41 to 2-45) consists of lists of local, state, regional, and national preservation partners. If there is desire to retain it, consider renaming it “Preservation Partners” or retooling it to include more advocacy-related content.

## CHAPTER 4: IMPLEMENTATION

- Because the Implementation Table is directly tied to identified Actions (linked to Policies and Goals), it may be more appropriate to remove the table from this document and make it an appendix to the new Historic Preservation element.

### PRESERVATION POLICIES, GOALS, AND ACTIONS: THE NEW HISTORIC PRESERVATION ELEMENT

We recommend that Chapter 3 (Program Goals) of the existing HP Plan be used as the starting point for the new Historic Preservation plan element. Generally, it is anticipated that the goals, policies, and actions of that chapter will be systematically reviewed to identify four types of needed improvements:

- Identify policies that are redundant with similar, overlapping, or duplicate policies elsewhere in the Comprehensive Plan and could potentially be removed from the HP element.

*Example: Some policies related to design review and residential development standards may be redundant.*

- Identify policies or actions that are inadequately aligned with, or do not address, goals in the Comprehensive Plan and that may need to be adjusted for consistency.

*Example: Some policies and actions may be modified to better support City housing and growth goals.*

- Identify existing policies and actions that warrant clarification

*Example: Clarification could be added to the historic district nomination process as described in Chapter 13.07 of the TMC.*

- Identify new goals, policies, or actions that are needed to address initiatives that are not adequately addressed in the existing HP Plan.

*Example: Goals, policies, and actions that more directly consider diversity, equity, and inclusion (DEI) objectives may be warranted. Examples, which are discussed further below, include reviewing nomination criteria in TMC Chapter 13.07 to ensure that register eligibility is inclusive; giving consideration to adding a more expansive commemorative historic register; and increasing technical support for underserved areas.*

In many cases, changes to policies will also require modification of associated sections of the Tacoma Municipal Code.

## 2B. Key Policy and Regulatory Issues

A central component of the Comprehensive Plan Update scope consists of reviewing City policies and code sections pertaining to historical resources in order to develop proposed changes that would better align those policies and code sections with the goals of the

Comprehensive Plan. We close our report by summarizing identified policy and regulatory objectives that could be addressed as part of the Comprehensive Plan Update.

For each objective, we describe one or more ways City policies or regulations may be changed to address the identified deficiency. Some of the objectives primarily pertain to the Historic Preservation element and, potentially, other sections of the Comprehensive Plan; other objectives would be addressed primarily through changes to the Tacoma Municipal Code. Not surprisingly, many of the following objectives will require adjustment to both the Comprehensive Plan and the regulatory code.

The key policy and regulatory objectives have been divided into the following thematic categories:

- Equity Framework and Design Review
- Nomination Criteria and Process
- Cultural Resource Review
- Demolition Review

In addition, note that the City of Tacoma is currently undertaking a review and analysis of economic and development incentives that encourage the continued use and adaptive reuse of historically designated and older structures. This incentives study will likely result in additional policy and code changes.

## **EQUITY FRAMEWORK AND DESIGN REVIEW**

One of the primary goals in updating City policies and regulations regarding historic resources is to develop an equity framework that helps foster the equitable distribution of historic preservation-related services across Tacoma's diverse neighborhoods and communities. Potential key aspects of that framework are described below.

**Objective:** Enhance consistency between historic preservation goals and housing, equity, and sustainability goals.

**Discussion:** The Historic Preservation Plan describes several ways in which preserving historic places promotes environmental sustainability, economic sustainability, and cultural/social sustainability. This discussion warrants an update and expansion. Accordingly, as part of the update process, Comprehensive Plan policies and regulatory code will be reviewed and amended to address inconsistencies between historic preservation policies and policies elsewhere in the Comprehensive Plan relating to housing, equity, and sustainability.

**Objective:** Evaluate the appropriateness of design review fees for historic properties.

**Discussion:** As directed by City Council, design review fees for properties on the Tacoma Register of Historic Places, including those within locally designated historic



districts and individual City Landmarks, will be reviewed to assess their appropriate utility and scale. In particular, this assessment will evaluate whether the value to the City provided by such fees is appropriately balanced with the impact to community members.

**Objective:** Consider reducing design review requirements within historic districts.

**Discussion:** The Planning Commission concurred 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. Sample changes that will be considered include, but are not limited to:

- Exempting alterations to non-visible elevations from historic district design review requirements.
- Expanding existing exemptions in the Wedge and North Slope Historic Districts to other districts.
- Focusing design guidelines more on assessing the impact of a proposed project to the overall district than impacts to individual properties.

**Objective:** Consider adding diversity-based significance eligibility criteria.

**Discussion:** The criteria for designation to the Tacoma Register of Historic Places that are specified in TMC 13.07.040(B) will be reviewed to assess whether any criteria should be modified, or new criteria added, in order to better address culturally significant properties that are associated with one or more communities or histories that are currently underrepresented on the Register. Consideration will also be given to other potential approaches to increasing the diversity of the properties included on the Register, including:

- Reducing the minimum age threshold (below the traditional 50 years of age) for culturally significant properties.
- Creating a commemorative/cultural sites register for important sites that are not buildings and/or may not warrant regulatory review.

**Objective:** Seek ways to balance preservation services citywide.

**Discussion:** The City's preservation services tend to be focused on those districts and neighborhoods that proactively seek to document and designate properties, with underserved areas receiving less attention. The goals, policies, and actions of the Historic Preservation element will be reviewed to assess how

they could be expanded to encourage better balancing of preservation services citywide, so that preservation is also seen as a meaningful service for historically underserved communities.

**Objective:** Expand historic documentation requirements.

**Discussion:** The nomination process specified in TMC 13.07.050 will be reviewed to assess whether additional documentation requirements would be appropriate. For example, there could be a requirement for residential district nominations to address the history of “redlining,” the common twentieth-century real estate practice of systematically excluding specified racial or ethnic groups from purchasing properties in certain areas, if such history is relevant to that district. (Ideally, the City could develop a context statement on redlining citywide to support such a requirement.) Similarly, all district nominations could be required to include a summary of the Native American Tribal history of the location in question.

## **NOMINATION CRITERIA AND PROCESS**

**Objective:** Clarify the roles of the Landmarks Preservation Commission, the Planning Commission, and City Council in the historic district designation process.

**Discussion:** As directed by City Council, the sections of code Chapter 13.07 that outline the historic district designation process will be reviewed and amended to improve understanding of the respective roles of the Landmarks Preservation Commission, the Planning Commission, and City Council in the historic designation process. For example, historic district nominations could originate as an area-wide rezone application at the Planning Commission and be referred to the Landmarks Preservation Commission for historic review.

In conjunction with clarifying review body roles, the historic district designation process could be realigned to be consistent with other with other land use policy reviews in Tacoma. Historic overlays are currently the only type of proposed zoning change that does not receive City Council review if they are not approved by the Planning Commission. This could be modified to specify that district nominations go to City Council regardless of the Planning Commission recommendation.

**Objective:** Consider giving priority to certain categories of potential historic districts.

**Discussion:** Consideration will be given to ways of fostering and prioritizing the development, review, and approval of historic district nominations that meet

specified criteria, such as districts that are tied to a neighborhood plan or that are related to a BIPOC community organization, for example.

**Objective:** Ensure social and cultural significance is just as much a path to designation as architectural significance.

**Discussion:** Historic registers tend to have an abundance of architecturally distinctive properties, while properties that are significant for their social or cultural associations are comparatively underrepresented. To help offset this imbalance, the City could develop a series of thematic and cultural context statements that could be used as key references in nominating socially or culturally significant properties and districts.

**Objective:** Assess potential advantages of separating designation approval from approval of controls and incentives.

**Discussion:** The merits of restructuring the nomination process will be investigated. Specifically, consideration will be given to separating the designation process – which could be done by the LPC and not require City Council approval – from the establishment of design review and incentives – which would require City Council approval. A process that is bifurcated in this way would separate the question of whether a given property or district satisfies the TRHP eligibility criteria from the question of whether it is appropriate to apply preservation controls to that property or district.

**Objective:** Clarify designation process for significant interior spaces.

**Discussion:** There are ambiguities in the code language in TMC sections 13.05.005.A, 13.05.005.A.2.c, and 13.07.030 regarding significant interior spaces. The code will be updated to clarify whether including “significant interior spaces” in a nomination is only permitted for publicly owned buildings, and whether such “significant interior spaces” are limited to “public” areas of the building, such as a lobby.

**Objective:** Streamline the relationship between the local, state, and national historic registers.

**Discussion:** Consideration will be given to ways of streamlining the process whereby properties that are already listed on the Washington Historical Register or the National Register of Historic Places can be listed on the Tacoma Register of Historic Places. While it is essential to retain a local legislative process for local designation, that process could be simplified or fast-tracked

for properties that are already WHR- or NRHP-listed. In particular, the amount of additional documentation a property owner(s) is asked to provide to support a local nomination could be significantly reduced in instances where a WHR or NRHP nomination form for the property already exists.

## **CULTURAL RESOURCE REVIEW**

**Objective:** Review Cultural Resource Review language for clarity and consistency.

**Discussion:** TMC 13.12.570 will be reviewed for clarity. In particular, the code language will be adjusted to clarify what types of permits require Cultural Resource Review and which are exempt. Consideration will also be given to developing a simplified permit application for simpler CR Reviews, and to assessing whether changes should be made to more clearly prioritize consultation with tribal governments.

**Objective:** Update code to reflect the citywide Unanticipated Discovery Plan (UDP) requirement.

**Discussion:** TMC 13.12.570 requires, for any project within the jurisdiction of that code section, the submittal of an Unanticipated Discovery Plan (UDP), which is a document outlining the steps to be taken in the event of the discovery of human remains or suspected archaeological materials during the course of construction. There are many areas within City limits, however, that are outside of the areas covered by TMC 13.12.570 but that have a high to moderate probability for the discovery of archaeological materials, or that are significant based upon ethnographic data. In response, Planning and Development Services Director's Rule 01-2022 (June 27, 2022) established, as an interim measure, that a UDP would be required for development permits citywide. As part of the Comprehensive Plan update process, consideration will be given to whether to make this rule permanent and, if so, how best to integrate the new requirement language into the code.

## **DEMOLITION REVIEW**

**Objective:** Review and update the City's code language regarding demolition.

**Discussion:** City regulations pertaining to demolition are currently spread across multiple sections of the Tacoma Municipal Code, most notably 8.35 (Preventing Neglect of Historic Properties), 13.07.110 (Demolition of City Landmarks), and 13.12.570(B) (Demolition of Historic Resources – Citywide). In addition, Planning and Development Services Director's Rule 04-2021 (August 23, 2021) established interim procedures intended to ensure that the historic review of demolition permits weighs the balance of the public benefit of

protecting the subject property against the potential impacts to the development project, and considers alternatives and mitigations in making the determination as to whether a property should be historically designated.

As part of the Comprehensive Plan update process, these demolition code sections will be comprehensively reviewed for clarity and consistency, and updated to address multiple goals, including:

- Incorporate the language of Director’s Rule 04-2021 as appropriate;
- Make demolition review process more transparent and efficient;
- Clarify cultural resource protections and mitigation procedures;
- Better account for considerations of financial or economic impacts of preservation;
- Clarify that the assessment in a district should be whether the building to be demolished is important to the district, not whether it is individually significant;
- Clarify how demo review should be done in areas with multiple overlay zones; and
- Incorporate Tribal consultation more effectively.

Objective: Consider expanding historic preservation enforcement section of the code.

Discussion: Discussion of penalties and enforcement related to historic resource-related violations is currently limited to TMC 8.35.060, which outlines the penalties associated with owning a neglected historic property. Consideration will be given to (1) expanding this section to provide more detail regarding enforcement and (2) developing a more broadly applicable enforcement code section that addresses additional classes of violations related to historic properties.