



AGENDA

MEETING: Regular Meeting (Hybrid)
DATE/TIME: Wednesday, August 7, 2024, 5:00 p.m.
LOCATION: Council Chambers, 1st Floor of the Tacoma Municipal Building
747 Market Street, Tacoma, WA 98402
ZOOM INFO: Link: <https://www.zoom.us/j/84416624153>
Dial-in: +1 253 215 8782
ID: 844 1662 4153

A. Call to Order

- Quorum Call
- Land Acknowledgement
- Swearing in Re-Elected Commissioner

B. Approval of Agenda

C. Approval of Minutes

- December 6, 2023
- December 20, 2023

D. Public Comments

This is the time set aside for public comment on Discussion Items on this agenda.

- Written comments on Discussion Items must be submitted to Planning@cityoftacoma.org by 12:00 noon prior to the meeting. Comments will be compiled, distributed to the Commission, and posted on the Planning Commission's meeting webpage at www.cityoftacoma.org/PlanningCommissionAgendas.
- To comment virtually, join the meeting using Zoom and raise your virtual hand. To comment in person, sign in at the back of the Council Chambers. Where necessary, the Chair may limit the allotted time for comment.

E. Disclosure of Contacts and Recusals

F. Discussion Items

1. South Tacoma Groundwater Protection District – Landscaping and Tree Canopy Standards

- Description: Review landscaping and tree canopy standards for the Tacoma Mall Subarea and South Tacoma Manufacturing Industrial Center (STMIC), as



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¿Necesitas información en español? Cần thông tin bằng tiếng Việt? 한국어로 정보가 필요하십니까? ត្រូវការព័ត៌មានជាភាសាខ្មែរ?
Нужна информация на русском? Потрібна інформація українською мовою? Contact TacomaFIRST 311 at (253) 591-5000.

part of the South Tacoma Groundwater Protection District Code (STGPD) Update work plan. Review current standards and regional benchmarking comparisons, and potential approaches to updating existing standards.

- Action: Review and Comment.
- Staff Contact: Adam Nolan (anolan@cityoftacoma.org)

2. Tideflats Subarea Plan and EIS

- Description: Review a progress report on the Tideflats Subarea Plan and EIS and a tentative upcoming schedule.
- Action: Review and Comment.
- Staff Contact: Stephen Atkinson (SAtkinson@cityoftacoma.org)

G. Upcoming Meetings (Tentative Agendas)

- (1) August 21, 2024 – Potential Cancellation
- (2) Agenda for the September 4, 2024, meeting:
 - Comprehensive Plan Periodic Review - Parks and Recreation
 - Health Impact Assessments
- (3) Agenda for the September 18, 2024, meeting:
 - Comprehensive Plan Periodic Review
 - Urban Form
 - Housing
 - Public Facilities and Services

H. Communication Items

- (1) **Reports/Communications from Staff**
- (2) **Status Reports by Commissioners** – Picture Pac Ave, and the TOD Task Force.
- (3) **IPS Agenda** – The Infrastructure, Planning, and Sustainability Committee’s next hybrid meeting is scheduled for Wednesday, August 14, 2024, at 4:30 p.m.; the agenda (tentatively) includes Transportation Commission interviews and a presentation on the Streets Initiative 2 timeline and feedback. (Held at 747 Market Street, Tacoma, WA 98402, Conference Room 248 or virtually at <http://www.zoom.us/j/87829056704>, passcode 614650)

I. Adjournment



MINUTES (draft)

MEETING: Regular Meeting (hybrid)

DATE/TIME: Wednesday, December 6, 2023, 5:00 p.m.

PRESENT: Christopher Karnes (Chair), Anthony Steele (Vice-Chair), Morgan Dorner, Robb Krehbiel, Brett Marlo, Matthew Martenson, Jordan Rash, Sandesh Sadalge, Brett Santhuff

ABSENT: N/A

A. Call to Order

Chair Karnes called the meeting to order at 5:00 p.m. A quorum was declared.

Chair Karnes read the Land Acknowledgement.

B. Approval of Agenda

Vice-Chair Steele moved to approve the agenda as submitted. Commissioner Sadalge seconded the motion. The motion passed unanimously.

C. Approval of Minutes

- October 18, 2023

Vice-Chair Steele moved to approve the October 18, 2023, meeting minutes. Commissioner Sadalge seconded the motion.

Commissioner Steele suggested an edit under the Home In Tacoma item to add that the Commission discussed including a street overlay on the maps moving forward.

The motion passed unanimously.

D. Public Comments

Brian Boudet, Planning Division Manager, reported that no written comments were received for public comment.

No individuals addressed the Planning Commission.

Public Comment ended at 5:04 p.m.

E. Disclosure of Contacts and Recusals

Commissioner Sadalge disclosed that he had discussions with Council Member Olgy Diaz regarding home occupancy, and that his wife has an LLC and home occupancy license.

Chair Karnes disclosed that he also has an LLC with a home occupancy permit and noted that this will not affect any discussions for the meeting.

F. Discussion Items

1. Neighborhood Planning Program – Proctor Neighborhood Plan

Lauren Hoogkamer, Principal Planner, and Anneka Olson, Senior Planner, presented the draft Proctor Neighborhood Plan, including a summary of previous steps, the Commission's previous feedback, new

sections added, an overview of the plan, the “In Memoriam” page, methodology, and an engagement overview.

Callie Stoker-Graham, Proctor Steering Group member, provided feedback on community engagement.

Olson further presented the draft plan, including information on how the steering group was created, asset mapping, values and vision, and the Proctor priorities.

Karl Cunningham, Proctor Steering Group member, provided feedback regarding community values and priorities.

Olson and Hoogkamer outlined major ideas and updated actions in the plan, the implementation strategy, lessons learned, the appendices summary, and proposed next steps.

Commissioner Rash expressed appreciation for community members’ and staff’s time on this project.

Vice-Chair Steele moved to approve and recommend the draft plan to the City Council. Commissioner Sadalge seconded the motion. The motion passed unanimously.

2. Home In Tacoma – Phase 2

Elliott Barnett, Senior Planner, outlined the project schedule, including upcoming assessments and analyses, the timeline for the public review package, and the draft code.

The Commission requested clarification regarding the procedure for consideration and recommendation, the timeline allotted for public review and comment, and the site planning exercise. Additionally, the Commission requested more detailed, high-resolution maps in the package and more details of the design standards.

Barnett introduced Ted Richardson, Felicia Medlen, Housing Division Manager, and Tyler Bump, ECOnorthwest; and outlined the meeting objectives, the bonus program, public benefits, and fee in lieu. Bump reviewed the chart results for low-scale and mid-scale residential, and fee considerations. Barnett presented the fully affordable projects, noting the proposed “bonus 2”.

The Commission discussed if developers would increase the cost of units to offset the cost of fee in lieu, Area Median Income (AMI) levels and the 60% AMI baseline, having a repeating analysis on fee in lieu amounts, funds in the Housing Trust Fund, 50-year requirement in the “bonus 2” program, parking requirements in the bonus program, and replacement values.

The Planning Commission recessed at 6:40 p.m. and reconvened at 6:50 p.m.

Barnett introduced Carl Metz, Senior Planner, and presented the non-residential uses in urban residential zones, non-residential examples, residential transitions, and bike parking.

The Commission provided direction on the home occupation language regarding non-family employees versus non-resident employees, short-term bike parking, terminology of “cottage business”, public hours of operations, uses in historic structures, bike racks in the public right-of-way, certain types of businesses being allowed in home occupation spaces, live/work, secure storage for bike parking, number of employees for home occupation, and including the full range of options in the package.

Barnett outlined the zoning map and reduced parking area (RPA), including the proposed urban residential (UR) zoning review; Pacific Avenue (Pac Ave) zoning and RPA; Manitou annexation area; and UR zoning in other Comprehensive Plan designations.

The Commission provided direction on Pac Ave RPA options, the allowance of single-family homes, and major institutional campus zoning.

Barnett outlined the next steps in the review process.

H. Upcoming Meetings (Tentative Agendas)

(1) Agenda for the December 20, 2023, meeting includes:

- 2024 Comprehensive Plan Update

- South Tacoma Groundwater Protection District Code Update
(2) January 3, 2024 - Cancelled

I. Communication Items

The Commission acknowledged receipt of communication items on the agenda.

Chair Karnes reported that the TOD Task Force is meeting, and an update is forthcoming.

Boudet noted he will present the Planning Commission Annual Report and Work Program at the Infrastructure, Planning, and Sustainability Committee on December 13, 2023. He also noted that at the December 5, 2023, City Council meeting, the Council adopted a resolution directing the Planning Commission to identify appropriate zoning and development standards for the siting of Enhanced Services Facilities.

J. Adjournment

The meeting was adjourned at 7:47 p.m.

**These minutes are not a direct transcription of the meeting, but rather a brief capture. For full-length audio recording of the meeting, please visit:*
http://www.cityoftacoma.org/government/committees_boards_commissions/planning_commission/agendas_and_minutes/



MINUTES (draft)

MEETING: Regular Meeting (hybrid)

DATE/TIME: Wednesday, December 20, 2023, 5:00 p.m.

PRESENT: Christopher Karnes (Chair), Anthony Steele (Vice-Chair), Morgan Dorner, Robb Krehbiel, Brett Marlo, Matthew Martenson, Jordan Rash, Brett Santhuff

ABSENT: Sandesh Sadalge

A. Call to Order

Chair Karnes called the meeting to order at 5:00 p.m. A quorum was declared. Chair Karnes read the Land Acknowledgement.

B. Approval of Agenda

Vice-Chair Steele moved to approve the agenda as submitted. Commissioner Krehbiel seconded the motion. The motion passed unanimously.

C. Approval of Minutes

There were no meeting minutes to approve.

D. Public Comments

Stephen Atkinson, Principal Planner, reported that six written comments were received regarding the South Tacoma Groundwater Protection District Code Update

The following individuals addressed the Planning Commission:

1. Kit Burnes
2. Tim Smith
3. Cathie Urwin

Public Comment ended at 5:13 p.m.

E. Disclosure of Contacts and Recusals

There were no disclosures of contacts and recusals.

F. Discussion Items

1. One Tacoma Plan Update

Atkinson provided introductory remarks regarding the Comprehensive Plan update. Lisa Johnson, Seva Workshop, introduced the consultant team.

Maryam Moeinian, Senior Planner, outlined the regional planning framework, noting the Growth Management Act (GMA); specific GMA requirements; the purpose of the Comprehensive Plan update, and the update schedule.

Atkinson presented the new mandatory GMA scope elements, new VISION 2050 scope elements, focus areas of the Plan scope, scope highlights, and other potential tasks.

Carrie Wilhelme, Principal Transportation Planner, provided an overview of the Transportation Master Plan (TMP) and the TMP update.

Alyssa Torrez, Senior Planner, outlined the community engagement plans, interdepartmental coordination, communications, engagement tools, and the engagement timeline.

Atkinson presented the next steps and scope options.

The Commission discussed scope options, including task prioritization, specific criteria to support recommendations, mandatory versus optional elements, Plan versus Code elements, and engagement efforts, noting maps and visual aids.

The Planning Commission recessed at 6:36 p.m. and reconvened at 6:43 p.m.

2. South Tacoma Groundwater Protection District (STGPD) Code Update

Atkinson provided introductory remarks and outlined the project approach, the initial work plan, and proposed updates to the scope of work.

Moeinian presented the project overview; including what STGPD is, why it is being updated, and how it relates to the Comprehensive Plan update.

Glen George, Tacoma Water, outlined the Tacoma Water Integrated Resource Plan (IRP), including important outcomes of the first IRP in 2018, potential methods to further enhance resource adequacy and reliability, and factors to be addressed in the IRP. Scott Hallenberg, Tacoma Water, presented the Tacoma Water Wellhead Protection Plan, including its purpose and current and future activities.

Dana Deleon, Environmental Services, outlined stormwater (SW) management in Tacoma, including where SW goes, the National Pollutant Discharge Elimination System Stormwater permit, the SW Management Program, best management practices for SW, a SW Comprehensive Plan, and the timeline and outcomes of the SW Comprehensive Plan. Shauna Hansen, Environmental Services, presented the Urban Waters Protection Plan, including the Tacoma watershed prioritization tool, SW/watershed focus areas, SW priority action list, and the Urban Protection Plan timeline.

Atkinson outlined the health impact assessment, coordinated schedule, public engagement, and next steps.

The Commission discussed the work plan approach, community expectations, public engagement, coordination with the South Tacoma Neighborhood Council, the Green River, and industries with high concentrations of hazardous materials.

H. Upcoming Meetings (Tentative Agendas)

(1) January 3, 2024 – Cancelled

(2) Agenda for the January 17, 2024, meeting includes:

- Home In Tacoma – Phase 2
- One Tacoma Comprehensive Plan Update – Scope and Budget

I. Communication Items

The Commission acknowledged receipt of communication items on the agenda.

Atkinson provided updates on the following:

- Ordinance No. 28924, relating to the Manitou Annexation Area.
- Ordinance No. 28926, relating to street tree standards.
- Resolution No. 41311, relating to Enhanced Services Facilities.
- Appreciation from the Infrastructure, Planning, and Sustainability Committee for all the work the Commission has done.

J. Adjournment

The meeting was adjourned at 7:56 p.m.

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http://www.cityoftacoma.org/government/committees_boards_commissions/planning_commission/agendas_and_minutes/



To: Planning Commission
From: Adam Nolan, Planning Services Division
Subject: Landscaping/Tree Canopy Standards - South Tacoma
Groundwater Protection District
Memo Date: August 1, 2024
Meeting Date: August 7, 2024

Action Requested:

Direction – Range of standards for landscaping and tree canopy code amendments.

Discussion:

At the Planning Commission’s meeting on August 7, 2024, staff will present information on landscaping and tree canopy standards for the Tacoma Mall Subarea and South Tacoma Manufacturing Industrial Center (STMIC), as part of the South Tacoma Groundwater Protection District Code (STGPD) Update workplan. Staff will provide an overview of current standards and regional benchmarking comparisons, and potential approaches to updating existing standards.

Review of landscaping and tree canopy standards in the STMIC is an expansion of the scope of the STGPD workplan in response to community concerns. At the Planning Commission meeting on October 4, 2023, staff received direction from the Commission to expand the scope of landscaping and tree canopy standards to also include the Tacoma Mall Subarea. Staff is seeking direction from the Commission on the potential parameters for updating the landscaping and tree canopy standards in these geographies of the STGPD. To support this discussion staff has attached a discussion outline, STMIC landscaping standards review, and code benchmarking comparisons.

Project Summary:

The Growth Management Act (GMA) requires the designation and protection of “Critical Areas” to prevent harm to the community from natural hazards and to protect natural resources. The South Tacoma Groundwater Protection District is a designated Critical Aquifer Recharge Area. The City of Tacoma is reviewing and updating Tacoma Municipal Code Section 13.06.070 South Tacoma Groundwater Protection District and Tacoma Municipal Code Section 13.11.800 Aquifer Recharge Areas, in accordance with the Work Plan as adopted by Substitute Resolution No. 40985 and as modified by Ordinance No. 28872 enacting a moratorium on underground storage tanks and metal recycling/auto wrecking facilities within the South Tacoma Groundwater Protection District. At the Planning Commission meeting on October 4, 2023, staff received direction from the Commission to expand the scope of landscaping and tree canopy standards to also include the Tacoma Mall Subarea.

Prior Commission Review:

- October 4, 2023: Staff presented an initial comparison of critical aquifer recharge standards for Pierce County jurisdictions that have jurisdiction within the South Tacoma Aquifer with a focus on Impervious Surface Standards, Landscaping Standards, and High Risk/High Impact Uses.



Planning Commission
Landscaping/Tree Canopy - STGPD Code Amendments
August 7, 2024
Page 2 of 2

Staff Contact:

- Adam Nolan, Senior Planner, anolan@cityoftacoma.org

Attachments:

- Attachment 1: Discussion Outline
- Attachment 2: STMIC Landscaping Standards Review
- Attachment 3: Code Benchmarking

c. Peter Huffman, Director

Attachment 1: South Tacoma Groundwater Protection District Landscaping/Tree Canopy Discussion Outline

August 7, 2024

Background

The review of Landscaping/Tree Canopy standards is an expansion of the scope of work for the South Tacoma Groundwater Protection District (STGPD). At the December 20, 2023 Planning Commission meeting, the Commission provided direction to staff to extend the scope of landscape and tree canopy review to the South Tacoma Manufacturing Industrial Center (STMIC) and the Tacoma Mall Regional Growth Center (RGC). While a part of the overall STGPD code update workplan, this is a focused conversation on Landscaping/Tree Canopy in these specific geographies of the STGPD.

Importance of Tree Canopy

The Nature Conservancy - Washington's "[Outside Our Doors](#)" report (2016), highlights some of the benefits of increasing tree canopy and natural infrastructure including in addressing environmental equity and disproportionate impacts on low-income neighborhoods and communities of color, tackling urban environmental challenges, improving human health outcomes, and stimulating economic growth and opportunities. The City of Tacoma Community Forestry team created the [Tacoma Community Forestry Story Map](#) to highlight benefits of tree canopy, analyze distribution of tree canopy and associated impacts across different neighborhoods in Tacoma, and to draw attention to the human health dangers posed by the Urban Heat Island Effect. The Story Map provided a context on the history of inequitable policy in investment and current Equity/Opportunity indicators to illustrate some of the considerable disparities faced by some neighborhoods in Tacoma, including South Tacoma.

Geographic Scope

Landscaping standards are based by zoning districts in TMC 13.06.090. This Landscape and Tree Canopy review focuses solely on the Industrial districts and the Tacoma Mall RGC and is not recommending any changes to planting requirements (soil, soil depth, percentage of shrubs, etc.)

As shown on the STGPD Future Land Use Designations map on page 2:

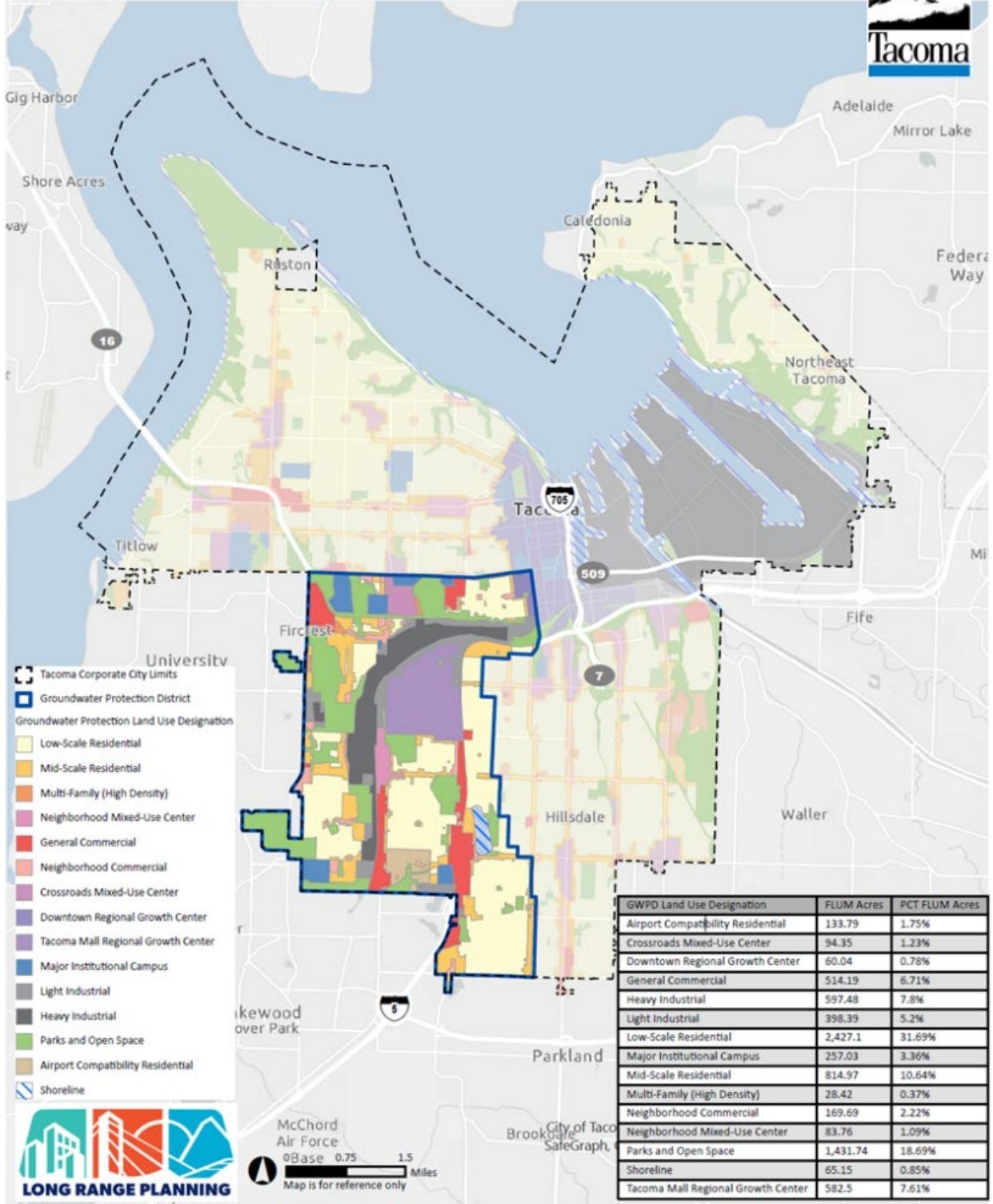
- Industrial districts comprise 13% of the STGPD overlay district
- The Tacoma Mall RGC comprises 7.61% of the STGPD overlay district.

*Not included in this review: Low and Mid-Scale Residential Land Uses (covering approximately 43% of the STGPD area) are undergoing a Landscaping and Tree Canopy review as part of the Home in Tacoma Zoning Update. Commercial Land Uses (covering approximately 9%) will be subject to further review as part of future Commercial zoning update.

South Tacoma Groundwater Protection District Future Land Use Designations



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 Author: abramovich



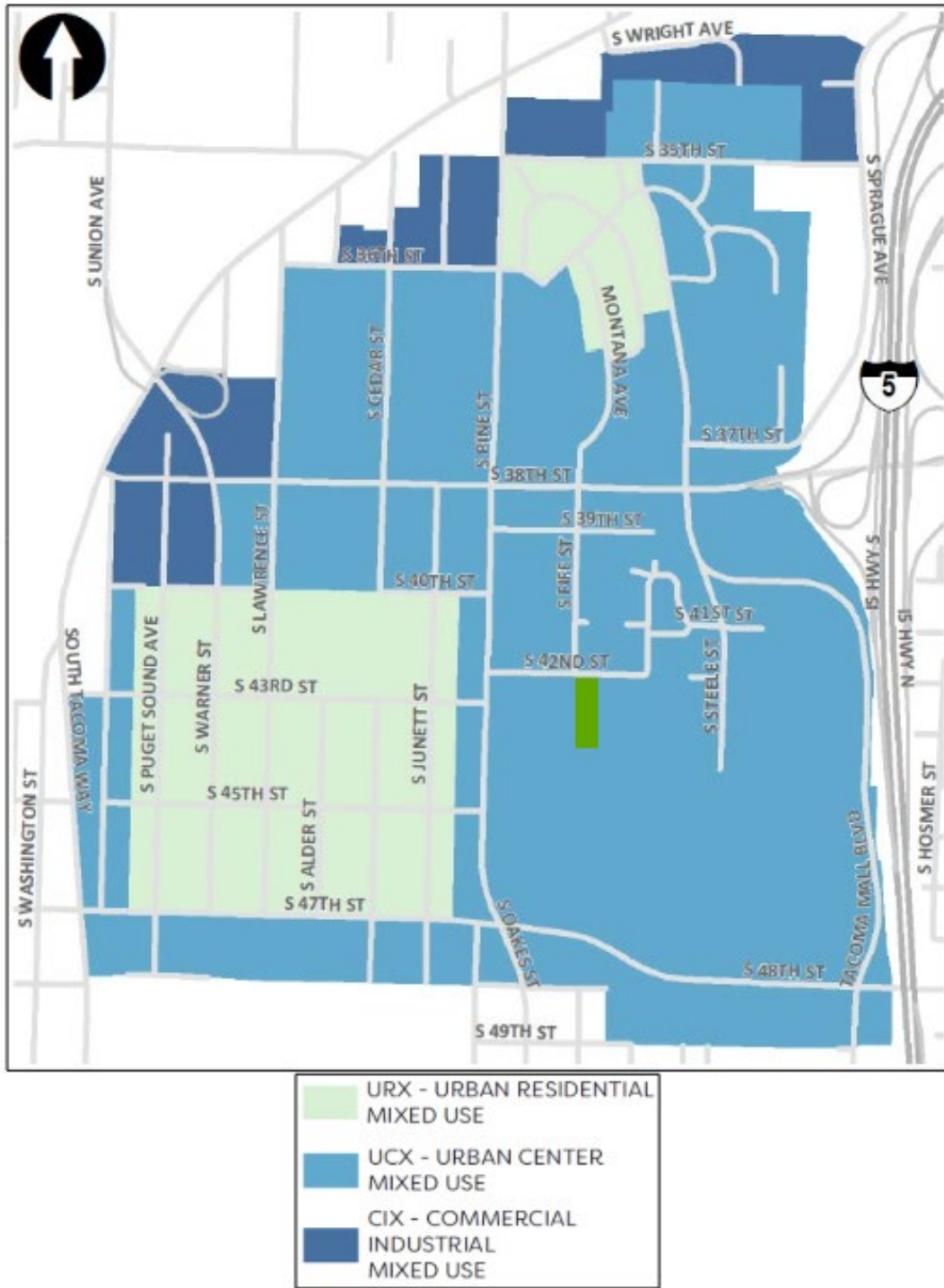
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 Map is for reference only

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South Tacoma Manufacturing Industrial Center (STMIC)
<p>Rationale</p> <p>The South Tacoma Neighborhood Council submitted an Amendment application focusing attention to updating the South Tacoma Groundwater Protection District Code and exploring an Economic Green Zone concept for the STMIC area. South Tacoma communities have raised concerns about tree canopy deficits in South Tacoma throughout the amendment and code update processes. Industrial zoning districts present some of the biggest gaps in tree canopy coverage in the city. Enhancing tree canopy in the STMIC can provide both groundwater/stormwater management benefits; address aesthetic impacts of industrial activity on adjacent neighborhoods; and provide mitigation of urban heat island effect for workers in the industrial area.</p>
<p>Land Use Coverage: Industrial districts comprise 13% of the STGPD overlay district (Map on page 2)</p>
<p>Tree canopy coverage: 7-9% (2017 tree canopy survey; City of Tacoma Canopy Cover webpage) (Map on page 8)</p>
<p>Applicable Zoning Districts</p> <ul style="list-style-type: none"> • M1 – Light Industrial; • M2 – Heavy Industrial <p>* STMIC is a zoning overlay district; focus on M1 and M2 zoning districts solely in this overlay zone and not citywide.</p>
<p>Preliminary Recommendations</p> <ul style="list-style-type: none"> • Minimum 15% Tree Canopy requirement • Must meet code requirements per TMC 13.06.090.B Landscaping Standards - these standards are counted towards the complete 15% tree canopy standard.

Tacoma Mall Regional Growth Center (RGC)
<p>Rationale</p> <p>The Tacoma Mall RGC has been recognized as historically lacking in tree canopy that has negatively affected already overburdened communities, and is an area planned for high level of residential and employment density. The City and its partners have committed considerable resources in conducting plans, studies, engagement, and capital facility improvement in the subarea. A central component of these plans has been a focus on expanding tree canopy throughout the Tacoma Mall Neighborhood.</p> <p>The Tacoma Mall Neighborhood Subarea Plan was adopted in May of 2018 with the goal of establishing “innovative planning and policy actions to help the area achieve its potential as a thriving, livable, walkable and transit-ready urban neighborhood.” Chapter 7 – Environment details Goals and Actions for tree canopy standards in the Tacoma Mall Subarea districts. (See page 7 below)</p> <ul style="list-style-type: none"> • Action E-9 sets a target of 25% tree canopy coverage in the Madison District, and 20% in the other three districts in the Tacoma Mall RGC.
<p>Land Use Coverage: The Tacoma Mall RGC comprises 7.61% of the STGPD overlay district. (Map on page 2)</p>
<p>Tree canopy coverage: 10% (2017 tree canopy survey; City of Tacoma Canopy Cover webpage) (Map on page 8)</p>
<p>Applicable Zoning Districts (Map on Page 6)</p> <ul style="list-style-type: none"> • URX – Urban Residential Mixed Use; • CIX Commercial Industrial Mixed Use; • UCX – Urban Center Mixed Use <p>*Consideration of changes would apply to the Tacoma Mall RGC, not to other zoning districts in of the city (URX, CIX).</p>
<p>Preliminary Recommendations: Adopt targets established in the Tacoma Mall Subarea Plan.</p> <ul style="list-style-type: none"> • Adopt a 25% Tree Canopy requirement for the Madison District • Adopt a 20% Tree Canopy requirement for the other three districts (Mall, Lincoln Heights, Northwest) • Must meet code requirements per TMC 13.06.090.B Landscaping Standards

Figure 1: Tacoma Mall Neighborhood RGC Zoning Districts



Source: TMC 13.06.040.J Tacoma Mall Neighborhood Regional Growth Center

The Tacoma Mall Subarea Plan (2018) set goals and actions for tree canopy coverage (Chapter 7-Environment). Tree canopy percentage targets were also established for the four different subarea character areas (See Table E-1 and map to the right).

Source: Tacoma Mall Subarea Plan, 2018

Goal E-3

Achieve 25% tree canopy coverage in the Tacoma Mall Neighborhood Subarea by 2040.

Action E-9

Target 25% tree canopy coverage in the Madison District and 20% coverage in other Districts by 2040.

Table E-1. Tree Canopy Targets for Character Districts

DISTRICT	ACRES	CURRENT TREE CANOPY (AVERAGE)	GOAL (AVERAGE)
Madison	184	10%	25%
Lincoln Heights	126	12%	20%
Northwest	71	7%	20%
Mall	194	8%	20%
Subarea	575	9.5%	25%

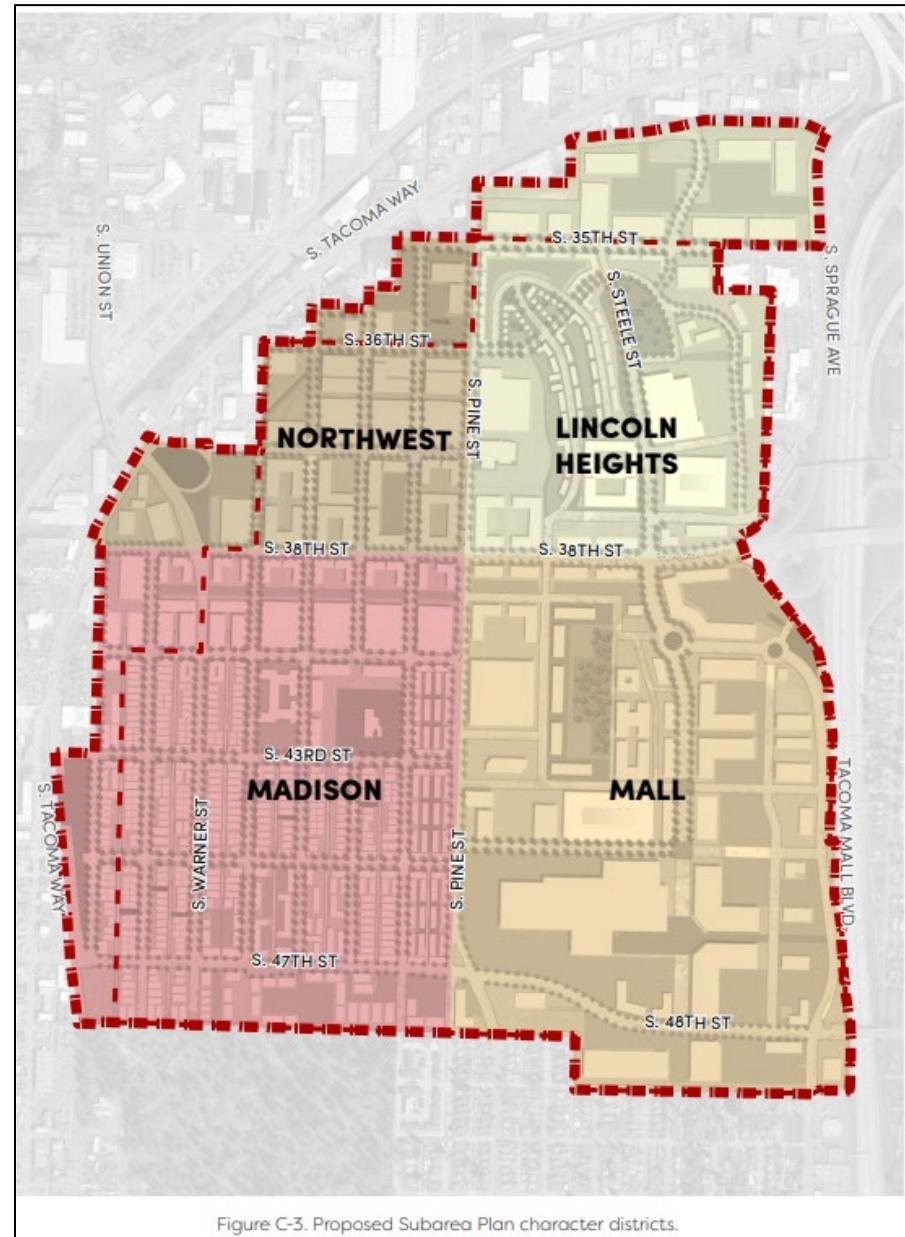
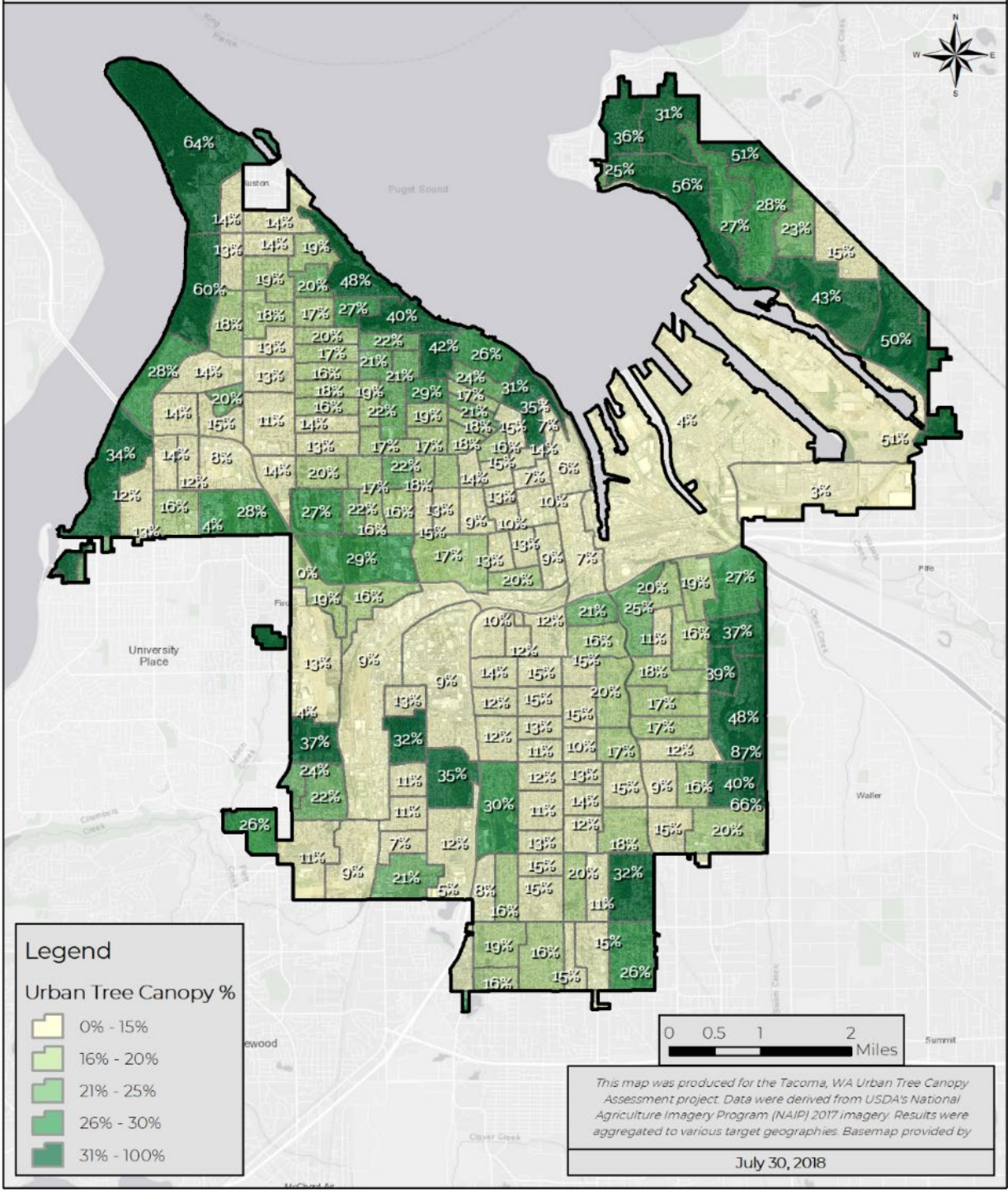


Figure C-3. Proposed Subarea Plan character districts.

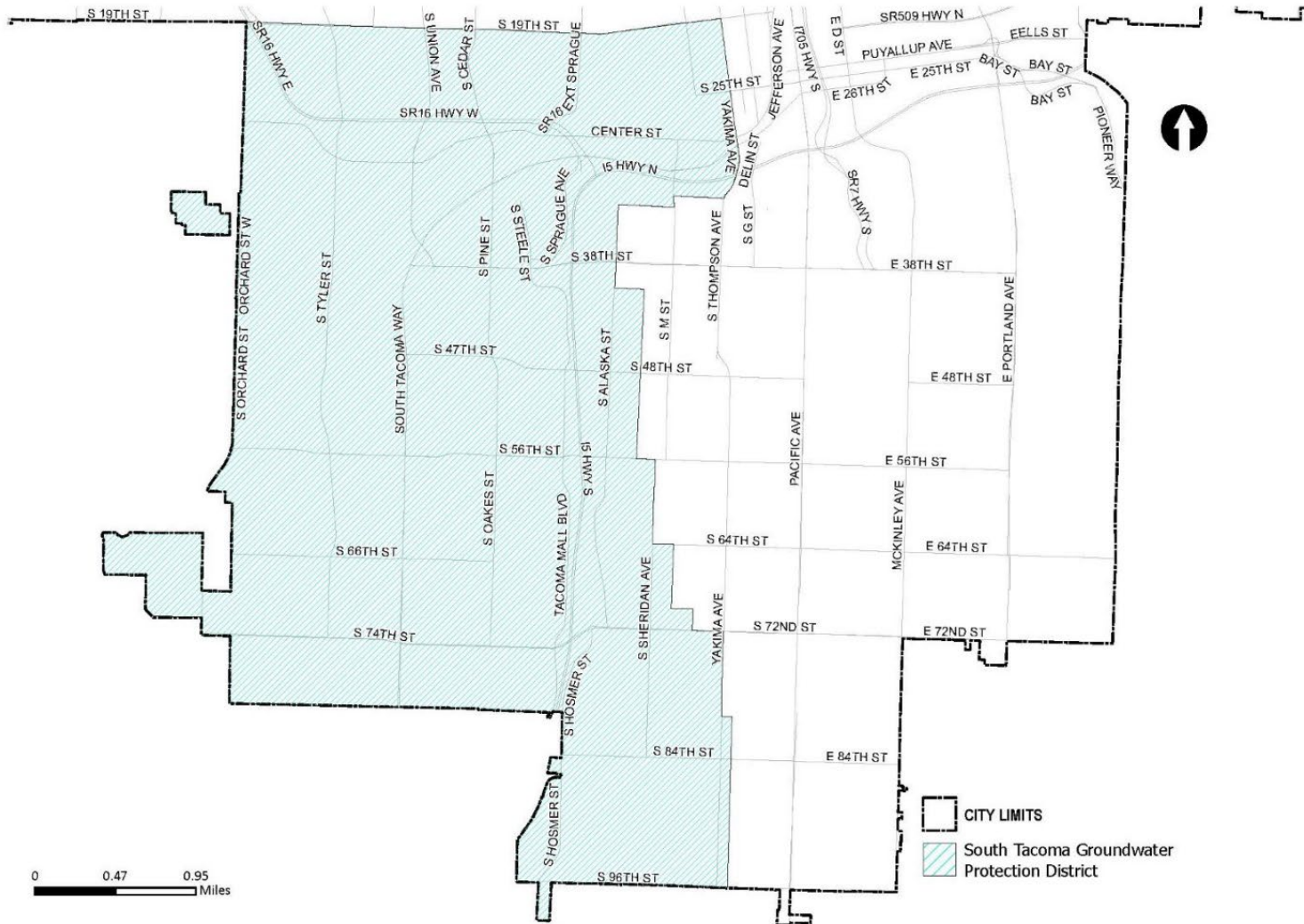
Urban Tree Canopy Assessment
Tacoma, WA



Urban Tree Canopy Percent by Census Block Groups



City of Tacoma | Planning and Development Services
South Tacoma Groundwater Protection District (STGPD)



Revised Date: 1/6/2023

Attachment 2:

South Tacoma Manufacturing Industrial Center

Landscaping/Tree Canopy Standards

TMC 13.06.090 Site Development Standards > B. Landscaping Standards

1. Overall Site Landscaping

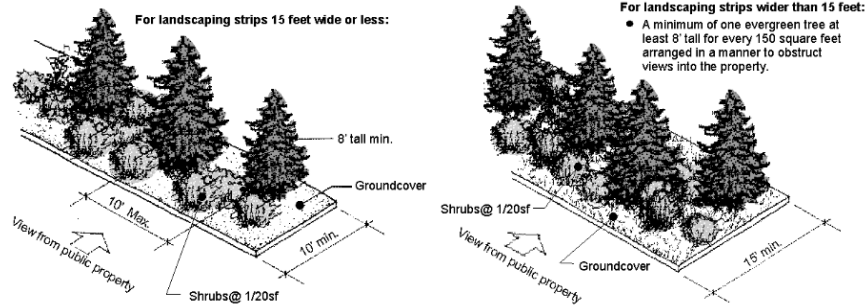
- a. Purpose of Standards: Overall Site Landscaping is intended to ensure that a minimum amount of landscaping is provided with development.
- b. Current Standards: 5 percent of parking areas over 20,000 sf
- c. Preliminary Recommendation: **No less than 15% of overall site not occupied by buildings**
 - A higher standard would aid in further achieving and equitably distributing some of the City's tree canopy goals, especially in an area of the City that has disproportionate lack of tree canopy and is subject to environmental and compatibility impacts associated with proximity to industrial zoned areas. Basing the standard on the portion of the site NOT occupied by buildings allows development flexibility to efficiently use the lot area for economic activity.
- d. Benchmarking Findings:
 - Vancouver, WA and Portland, OR have standards ranging between 0, 10, 15% based on intensity of industrial use;
 - Thurston County standard is that total area landscaped is to be no less than 10% of the total developed area;
 - Sumner standard is that total amount of landscaping be no less than 10 percent of the total site area;
 - Pierce County has standard of 10% of area of the site not occupied by buildings; (Total project area – building area = applicable area; Applicable area x 10% = required landscape area)
- e. Alternative Approaches:
 - No changes to the current standards. Maintaining current standards will not help in: addressing concerns identified by community members; reducing stormwater runoff; aiding in groundwater recharge; and accelerating the meeting of broader citywide tree canopy goals and addressing disparities in tree canopy coverage in South Tacoma.
 - Base the percentage on total site area rather than the portion of the site not occupied by buildings.
 - Typical approaches are to have a smaller percentage of the total lot area or a larger percentage of a smaller portion of the site.

2. Residential Transition Standards (Landscape Buffers)

- a. Purpose of Standards: Landscaping buffers are intended to function as a substantial vegetative screening providing physical and visual separation between dissimilar districts in order to soften visual and aesthetic impacts. Buffers also provide the aesthetic and environmental benefits of vegetation.
- b. Current Standards: Industrial zoning districts - Landscape buffer of 50 feet; potential flexibility (15-30 feet) dependent on existence of 6-foot vertical grade or in cases of industrial parcel having limited depth (150 or 300 feet in depth or less)
- c. Preliminary Recommendation:
 - Maintain 50-foot buffer requirement as it is consistent with or exceeds standards of regional counterparts; when adjacent to an R-zone.
 - Modify applicability so that a minimum 35 ft buffer is required when industrially zoned property is adjacent to any non-industrial zone.
 - Front yard would be exempt from landscape buffer standard and instead be subject to site perimeter standards
- d. Benchmarking Findings:
 - Fife requires a buffer yard 50 feet in width for buffer with residential district;
 - Sumner requires landscaped setback of 25 ft (M-1) or 35 ft (M-2) along any common boundary with residentially zoned property, including a six foot masonry wall or wood fence;
 - Vancouver, WA uses graduated buffer levels (L3-high screen, L4-high wall, L5-high berm) and buffer distance depending on if site is/is not separated by a street;
 - Pierce County requires full screen/berm
 - Portland, OR uses high screen with depth dependent on building height (varying on if more or less than 15 ft);
 - King County uses 20 ft of L1-full screening and 50 ft for industrial uses that are conditionally permitted.
- e. Alternative Approach:
 - Follow a more specific and graduated set of buffer standards similar to Vancouver and Pierce County, but that level of work is likely outside scope of our amendments.

3. Site Perimeter Landscaping

- a. Purpose of Standards: Site Perimeter Landscaping is intended to ensure that areas abutting property lines, and not developed with structures, be attractive, and provide the environmental benefits of vegetation.
- b. Current Standards:
 - Not required in Industrial Districts
 - A minimum 7-foot wide site perimeter strip shall be provided on sides without abutting street trees. The required perimeter strip shall be reduced to 5 feet for parcels of 150 feet or less in depth.
 - A minimum 5-foot wide site perimeter strip shall be provided on sides with abutting street trees



c. Preliminary Recommendation:

- Apply the current standards to Industrial Districts (currently exempted);
- Modify to require within 15 feet where there is a public right of way;
- Site perimeter is not required for perimeter areas where buffer is required.

d. Benchmarking Findings:

- Fife requires a minimum of 8 feet of perimeter-type landscaping along all interior yard property lines;
- Kent requires 10 feet of Visual Screen or Buffer for side yards;
- Thurston County requires a protective strip of land twenty-five feet in width bordering the external boundaries of the industrial districts be devoted exclusively to the planting, cultivation and maintenance of sight obscuring trees, shrubs;
- Sumner requires a hierarchy of plantings for any structure exceeding 30 feet in height and any un-modulated wall exceeding 100 feet in length, not including loading or office/sales areas;
- Vancouver setback standards determined based on zoning on abutting site.

e. Alternative Approaches:

- Continue to not require site perimeter landscaping in Industrial Districts. This approach will not aid in increasing tree canopy and its associated environmental and human health benefits, contribute to improving aesthetic qualities of industrial sites, or aid in buffering from neighboring uses.
- Explore a range of standards to incorporate perimeter landscaping (Fife, Kent, etc.).

4. Street Trees

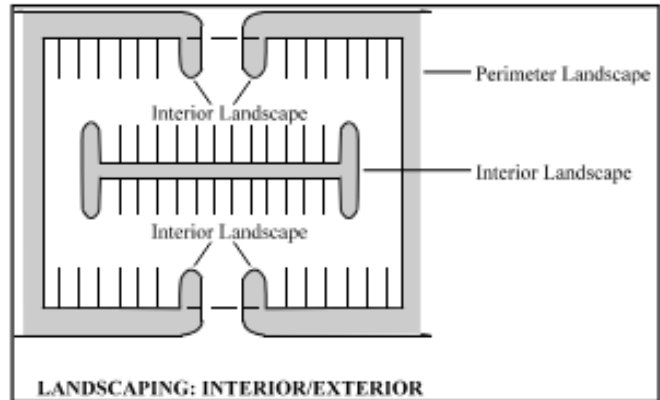
- Purpose of Standards: Street trees are intended to provide multiple benefits including aesthetics, traffic calming, environmental, shading, visual buffering and noise separation from streets.
- Current Standards: Required for all new development, including structures and/or parking lots, as well as alterations to existing development, and street improvements; Construction of new permanent roadways, excluding residential Local Improvement Districts; alterations to the width of existing permanent roadways; construction of new sidewalk; and replacement of more than 50% of an existing sidewalk along a site's frontage.
- Preliminary Recommendation: Maintain current standards requirement for street trees in M1 and M2 in STGPD.

5. Parking Lot Landscaping

- a. Purpose of Standards: Parking lot landscaping is intended to provide visual relief, to enhance the aesthetic appearance, screening from adjacent sites and public areas, to reduce environmental impacts of parking and other paved areas, and to provide shade and shelter for pedestrians.

b. Current Standards:

- Mix of interior and perimeter landscaping required. (13.06.090.4.g)
- Parking Lot Perimeter Landscaping Planting Requirements: Parking Lots with more than 20 stalls are required to provide a 10-foot wide planting strip
- Exceptions:
 - Not required in M2;
 - Parking lots of 15 stalls or less also not required to meet Interior Planting requirements.



c. Preliminary Recommendation:

- Require parking lot landscaping in M2, but would apply to employee parking areas;
- Not proposing modifications to the planting and distribution requirements.

d. Benchmarking Findings:

- Thurston County requires a minimum of ten percent of the total internal parking area shall be set aside for landscaping when parking facilities exceed five thousand square feet;
- Sumner requires one tree for every six automobile parking spaces provided;
- Fife requires one tree for every nine parking spaces;
- Portland requires that tree canopy must shade 40% of the parking area and that trees be planted in planting beds at least 8 feet wide within the interior of the parking lot.

e. Alternative Approach:

- No action. Continue to not require parking lot landscaping in M2. This approach will not aid in increasing tree canopy and its associated environmental and human health benefits, or contribute to improving aesthetic qualities of industrial sites.
- Consider examples from other jurisdictions.

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Benchmarking Jurisdictions

Jurisdiction	Overall Site Landscaping/Trees	Residential Transition Standards (Industrial districts abutting)	Site Perimeter Landscaping	Street Trees	Parking Lot Landscaping
Tacoma	Industrial Districts: 5 percent of parking areas over 20,000 sf	<ul style="list-style-type: none"> • A landscape buffer of 50 feet must be provided on the property, along the boundary abutting an R-district property • If a berm with a 6-foot vertical grade difference is provided on the property, the landscape buffer may be reduced to 30 feet. • Where the property required to provide a buffer is 300 feet or less in depth, measured perpendicularly from the residential parcel, the buffer can be reduced to 20 feet. • Where the property required to provide a buffer is 150 feet or less in depth, measured perpendicularly from the residential parcel, the buffer can be reduced to 15 feet. 	Site Perimeter Landscaping is not required in Industrial or X Districts	Required for all new development, including structures and/or parking lots, as well as alterations to existing development, and street improvements that meet three thresholds in code; Construction of new permanent roadways, excluding residential Local Improvement Districts; alterations to the width of existing permanent roadways; construction of new sidewalk; and replacement of more than 50% of an existing sidewalk along a site's frontage	<p>Mix of interior and perimeter landscaping required.</p> <p>Parking Lot Perimeter Landscaping Planting Requirements: Parking Lots with more than 20 stalls are required to provide a 10-foot wide planting strip per the planting requirements below.</p> <p>Exceptions:</p> <ul style="list-style-type: none"> -Parking Lot Perimeter Landscaping is not required in M-2 or PMI Districts. -Parking lots of 15 stalls or less are not required to meet Interior Planting requirements. -Parking lots of 15 stalls or less, located behind buildings and accessed by alleys, are exempt from the Site Perimeter requirement.
Seattle	<p>Landscaping that achieves a Green Factor score of 0.3 or greater pursuant to Section 23.86.019 is required for any lot with:</p> <p>a. Development, either a new structure or an addition to an existing structure, containing more than 4,000 new square feet of gross floor area; or</p> <p>b. Any parking lot containing more than 20 new parking spaces for automobiles.</p>	<p>5 feet set back from all lot lines abutting residential zoned lot:</p> <p>--surface parking of 5+ vehicles; parking structure w/out enclosed solid wall; drive-in business</p> <p>15 feet setback...</p> <p>--Outdoor recycling stations; outdoor loading berths; outdoor storage</p> <p>50 feet setback...</p> <p>--Any outdoor manufacturing, repairing, refuse compacting or recycling activity</p>		<p>Uses located on streets that have been designated on the Industrial Streets Landscaping Plan Map; Street trees are required along designated street frontages</p> <p>All uses which are directly across a street eighty feet (80') or less in width from a lot in a residential or commercial zone shall provide street trees.</p> <p>In Urban Industrial (UI) zones...development of either a new structure or an addition to an existing structure, containing more than 4,000 new gross square feet of floor area shall provide street trees.</p> <p>In Maritime Manufacturing and Logistics - MML zones... All uses shall provide street trees unless it is determined by the Director to be infeasible</p>	

Jurisdiction	Overall Site Landscaping/Trees	Residential Transition Standards (Industrial districts abutting)	Site Perimeter Landscaping ²⁶	Street Trees	Parking Lot Landscaping
Pierce County	<p>Each project site shall dedicate <u>10 percent</u> of the area of the site not occupied by buildings with landscaping. Other landscape requirements, such as low impact development best management practices, parking lot landscaping, parking garage landscaping, and perimeter landscaping requirements, may be counted toward this requirement when planted at the prescribed levels.</p> <p>Total project area – building area = applicable area Applicable area x 10% = required landscape area</p>	<p>Industrial uses shall install a Level 3 (Full Screen/Berm)Landscape Buffer per PCC 18J.15.040.H.3 along all project boundaries adjacent to an urban or rural residential zone.</p>	<p>Street trees and landscape buffers</p>	<p>Street trees shall be planted per PCC 18J.15.050 along all road frontages.</p> <p>Street trees shall be installed along both sides of all urban roads in urban areas only. Flexibility may be allowed when requirements for low impact development (LID) best management practices (BMPs) preclude street trees on both sides of a road.</p>	<p>Perimeter parking lot landscaping is required for any portion of a surface parking lot that is <u>within 20 feet of a public or private road right-of-way or shared access</u>.</p> <p>--Any portion of the parking area within 20 feet of a public road right-of-way shall provide a Level 2 Landscape Buffer, per PCC 18J.15.040.H.1, along the right-of-way line.</p> <p>--The perimeter street landscaping for the parking lot shall not count toward the total interior landscaping required for the parking lot.</p> <p>Interior parking lot landscaping is required for all new surface <u>parking lots with 10 or more spaces</u>.</p> <p>--A maximum of 10 parking stalls in a row shall be allowed between landscape planting islands.</p>
Thurston County	<p>Planned Industrial Park District AND Light Industrial- Total area landscaped is to be <u>no less than ten percent of the total developed area</u>.*</p> <p>*A minimum ten-foot wide landscaped strip shall be provided adjacent to all street frontages</p>	<p>Screening between incompatible uses shall consist of a thirty foot wide buffer</p>	<p>A protective strip of land twenty-five feet in width bordering the external boundaries of the industrial districts shall be devoted exclusively to the planting, cultivation and maintenance of sight obscuring trees, shrubs and plants as the use develops.</p>	<p>Street trees shall be required as part of frontage improvements pursuant to the Olympia UGA Zoning Ordinance.</p>	<p>When parking facilities exceed five thousand square feet, a minimum of ten percent of the total internal parking area shall be set aside for landscaping.</p> <p>Parking area landscaping is required in addition to any perimeter landscaping required</p> <p>An area equal to at least ten percent of the parking area shall be landscaped</p>

Jurisdiction	Overall Site Landscaping/Trees	Residential Transition Standards (Industrial districts abutting)	Site Perimeter Landscaping 27	Street Trees	Parking Lot Landscaping
Sumner	<p>In no case shall the total amount of landscaping be less than <u>10 percent</u> of the total site area....Developments may include any critical area and/or shoreline buffer areas when calculating landscape area if native vegetation is enhanced.</p> <p>Stormwater detention can only be included in the minimum landscaping area if low impact development techniques are used.</p>	<p>Required landscaped setback along any common boundary with residentially zoned property M-1 (25 feet) M-2 (35 feet)</p> <p>Required building setback along any common boundary with residentially zoned property M-1 and M-2 (50 feet)</p> <p>12a. Minimum street front landscaping for semi-truck/trailer storage, in feet M-1 (20 feet) M-2 (12 feet)</p> <p>Whenever M-1 or M-2 zoned property abuts any residential zone, a six-foot masonry wall or wood fence shall be established and maintained along the side or rear property line that abuts the residential zones</p>	<p>For any structure exceeding 30 feet in height and any un-modulated wall exceeding 100 feet in length, not including loading or office/sales areas, a hierarchy of plantings is required.</p> <p>Sumner Design Development Guidelines: --A 4-foot-tall and 12-foot-wide landscape berm is required between the street and the off-street parking. --include at least one single row of trees planted at a minimum of 20 feet on center unless the side yard is utilized as a shared maneuvering/loading area with an abutting property --Side yards are encouraged to be used for water quality features, such as grassy swales</p>	<p>Any applicant to improve property by new construction within the city shall be required to plant street trees...</p> <p>C. Any street tree that is removed shall be replaced within 180 days...</p>	<p>Parking areas shall be screened from public streets and arterials</p> <p>One tree is required for every six automobile parking spaces provided. Within parking lots containing more than two rows of parking spaces, trees shall be planted in planting beds at least 8 feet wide within the interior of the parking lot.</p>
Fife	<p>Combination of: 1) Fife Green Area Factor Requirement (Green area factor calculation found in 19.64.025)(Perimeter Landscaping counts in meeting this) 2) Perimeter landscaping requirements 3) Critical Areas and Stormwater requirements</p>	<p>Industrial District to Residential District, <u>buffer yard E</u> is required. (50 feet in width is required.)</p> <p>Buffer C required for Industrial to Commercial transition.</p>	<p>Front Yard. A total of 18 feet of perimeter-type landscaping is required within the 30-foot front yard setback. A minimum 25 percent of the required front yard trees shall be evergreen.</p> <p>Ten-Foot Row. A minimum of 10 feet of the perimeter-type landscaping is required along the front property line.</p> <p>Eight-Foot Row. An additional eight-foot row (or area and planting equivalent) of perimeter-type landscaping is required within the 30-foot yard setback.</p> <p>Interior Yard. A minimum of eight feet of perimeter-type landscaping is required along all interior yard property lines.</p>	<p>Street trees are required when any type of new development is proposed, except: -Changing a use, or establishing a temporary use or intermittent use; or -Expanding a structure by 1,000 square feet or less.</p> <p>When an existing structure is proposed to be expanded by more than 1,000 square feet, one street tree is required for each 500 square feet over the first 1,000 square feet, up to the maximum number of required trees.</p> <p>Public right-of-way landscaping shall be required for all development</p>	<p>One tree is required for every nine parking spaces.</p> <p>H. Screening of Surface Parking Areas. 1. Three-foot-high screening is required along street lot lines. 2. Surface parking abutting or across an alley from a lot in a residential zone must have six-foot-high screening along the abutting lot line(s) and a five-foot-deep landscaped area inside the screening.</p>

Jurisdiction	Overall Site Landscaping/Trees	Residential Transition Standards (Industrial districts abutting)	Site Perimeter Landscaping 28	Street Trees	Parking Lot Landscaping
Kent	Landscaping located in a right-of-way does not satisfy the landscape requirements	<p>Minimum Perimeter Landscape, Abutting Residential District/Use - I1, I2, I3: N/A, except for parking lots per KCC 15.07.040(B)(2)</p> <p>The perimeter of all parking lots that abut residential zones or uses shall be landscaped in a manner that shields residential zones or uses from lights and provides aesthetic separation between uses. minimum depth of five (5) feet of Type II landscaping and appropriate fencing (six (6) foot high solid wood fence or equivalent)</p>	<p>I1, I2, I3 -Abutting street- 15' Type III in front yard -Side Yard- 10' Type II or III -Rear Yard- N/A</p> <p>Type II - Visual Screen Type III - Visual Buffer</p>	Chapter 6.10 Street Trees - Not showing specifics to zoning districts	All parking, maneuvering, and loading areas of over twenty thousand (20,000) square feet shall have a minimum of ten (10) percent of the parking area, maneuvering area, and loading space landscaped with Type V landscaping as a means to reduce the barren appearance of the lot and to reduce the amount of stormwater runoff. Perimeter landscaping, required adjacent to property lines, shall not be calculated as part of the ten (10) percent figure.
Vancouver, WA	Minimum Landscaping Requirement (percentage of total net area) OCI (Office-Commercial-Industrial): 15% IL (Light Industrial): 10% IH (Heavy Industrial): 0%	<p>Separated from site by street Lower Density Resi: OCI - L2, 10ft; IL - L3, 20ft; IH - L3, 20ft Higher Density Resi: OCI - L2, 5 ft; IL - L3, 20ft; IH - L3, 20ft</p> <p>Not separated by a street Lower Density Resi: OCI - L4, 10ft; IL* - L4 in 40ft, L5 in 50ft; IH - L3, 20ft Higher Density Resi: OCI - L2, 5 ft; IL* - L4 in 40ft, L5 in 50ft; IH* - L4 in 40ft, L5 in 50ft</p> <p>*Buffer widths abutting parking areas that are landscaped in accordance with the requirements of VMC 20.945.040(I) can be reduced to 25 feet.</p> <p>Additional standards if industrial building exceeds 20ft in height to a 40ft max setback; screening requires for OCI zone</p>	Landscape/Buffer setback width standards determined based on zoning of abutting site (NOTHING SPECIFIC TO SITE PERIMETER)	<p>All development projects fronting on a public street or a private street required to plan street trees</p> <p>Existing street trees removed by development projects or other construction shall be replaced by the developer with those types of trees approved by the Planning Official.</p>	<p>Any off-street parking area shall be effectively screened by a sight-obscuring fence, wall or evergreen planting on each side which adjoins property situated in a residential zone, the premises of any school or like institution, or a public or private street.</p> <p>Interior landscaping must be provided for sites containing more than 20 parking spaces. At least 10% of the parking and maneuvering areas, not including driveway areas, must be landscaped.</p>

Jurisdiction	Overall Site Landscaping/Trees	Residential Transition Standards (Industrial districts abutting)	Site Perimeter Landscaping 29	Street Trees	Parking Lot Landscaping
Portland, OR	<p>Minimum Landscaped area (see 140.225) General Industrial 1 (IG1): None General Industrial 2 (IG2): 15% of site area Heavy Industrial (IH): None</p> <p>up to one-third of the required landscaped area may be improved for active or passive recreational use, or for use by pedestrians</p> <p>Any required landscaping, such as for required setbacks or parking lots, applies towards the landscaped area standard.</p>	<p>Landscaping is required for all employment and industrially zoned lands abutting R-zoned lands to provide buffering and promote the livability of the residential lands.</p> <p>Minimum Building Setbacks and Minimum Landscape Buffer From Residential Zone Lot Lines IG1: - Height of Building wall 15 ft. or less (Lots abutting a side lot line of R zoned lot: 5ft/5ft @ L3)(Lots abutting a rear lot line of an R zoned lot: 0/none) - Height of Building wall 16 ft. or more (Lots abutting a side lot line of R zoned lot: 10ft/5ft @ L3)(Lots abutting a rear lot line of an R zoned lot: 10ft/5ft @ L3)</p> <p>IG2, IH: - Any Height (Lots abutting a side lot line of R zoned lot: 15ft/10ft @ L3)(Lots abutting a rear lot line of an R zoned lot: 15ft/10ft @ L3)</p>	Nothing clearly stated	Any proposed change in width in a public street right-of-way or any other proposed street improvement, including the development of new public streets, shall include areas for tree and landscape planting where practical.	For new driveways and new parking areas in all zones when the new parking area is at least 21,780 square feet in total area (Structured parking is not included in the total): Tree canopy must shade at least 40 percent of the parking area.
King County		<p>Twenty feet of Type I (full screen) landscaping shall be included in a commercial or industrial development along any portion adjacent to a residential development;</p> <p>- 20ft Required on property lines adjoining rural area and residential zones. - 50ft Required on property lines adjoining rural area and residential zones for industrial uses established by conditional use permits.</p>	<p>Ten feet of Type II (filtered screen) landscaping shall be included in an industrial development along any portion adjacent to a commercial or institutional development;</p> <p>Minimum Street Setback (Industrial 25 feet)</p>	<p>21A.16.050 Landscaping - street frontages. The average width of perimeter landscaping along street frontages shall be provided as follows: B. Ten feet of Type II landscaping shall be provided for an industrial development;</p>	<p>Commercial, industrial or institutional developments shall provide landscaping at a rate of:</p> <ol style="list-style-type: none"> 1. Twenty square feet per parking stall if ten to thirty parking stalls are provided; and 2. Twenty-five square feet per parking stall if thirty-one or more parking stalls are provided; <p>C. Trees shall be provided and distributed throughout the parking area at a rate of:</p> <ol style="list-style-type: none"> 1. One tree for every three parking stalls for a commercial or industrial development; <p>D. The maximum distance between any parking stall and landscaping shall be no more than one hundred feet</p> <p>F. Landscaping around the perimeter of a site that is in addition to the perimeter landscaping required by K.C.C. 21A.16.050 may count toward ten percent of the required surface parking area landscaping if it is adjacent to the parking area</p>



City of Tacoma
Planning and Development Services

To: Planning Commission
From: Stephen Atkinson, Principal Planner, Planning and Development Services
Subject: **Tideflats Subarea Plan and EIS**
Memo Date: August 1, 2024
Meeting Date: August 7, 2024

Action Requested:
Informational Briefing

Discussion:

On August 7, 2024, Staff will provide the Planning Commission with a progress report on the Tideflats Subarea Plan and EIS and a tentative upcoming schedule. Draft Plan and EIS documents are currently available at www.cityoftacoma.org/tideflatsplan.

Draft Plan Development

Under the approved [Intergovernmental Work Plan](#) the Tideflats Steering Committee, comprised of two elected representatives from each of the partner governments, has been established to guide the initial development of the Draft Subarea Plan. The Steering Committee has been progressing in reviewing proposed policies and actions on a topical basis and is expected to complete a draft Plan and recommendation this fall. These draft documents are available online and include:

- [Shoreline Public Access and Recreation](#)
- [Brownfields and Remediation](#)
- [Environment, Health, and Tribal Assets](#)
- [Sea Level Rise](#)
- [Economic Development](#)

The Steering Committee's recent meetings in June and July, and forthcoming on August 8, are focused on reviewing the [land use alternatives for each character area](#) and providing guidance on the preferred land use concepts. Following the land use discussion, the Steering Committee will consider proposed transportation policies and actions in September and then an overall draft review and recommendation in October/November.

Draft Environmental Impact Statement (EIS)

The Draft EIS was issued by the City of Tacoma on April 9, 2024 for a 45-day Public Comment period that ended on May 23, 2024. During the public comment period the City received approximately 83 public comments as well as oral testimony at a public comment meeting. These public comments will help to inform further evaluation or adjustments to the EIS for final release. The issuance of the Final EIS is required prior to the City Council adoption of the Subarea Plan.

Project Summary:

The Tideflats subarea planning process is intended to create a shared long-term vision and more coordinated approach to development, environmental review, and strategic capital investments in the



Tideflats. Completion of the subarea plan will support the ongoing eligibility for and prioritization of transportation funding in the regional manufacturing and industrial center.

The Tideflats is a unique environment containing shoreline, river deltas, tidal creeks, freshwater and salt marshes, naturalized creeks, and river channel corridors. With an area of over 5,000 acres of waterfront land providing vital saltwater and estuarian habitat for salmon, shellfish and other marine life, the Tideflats is an economic center that includes industrial and manufacturing and maritime activity in a world class port and is the ancestral lands of the Puyallup Tribe of Indians.

In recognition of the regional significance of the Tideflats, the City of Tacoma, Port of Tacoma, Puyallup Tribe of Indians, City of Fife, and Pierce County have partnered to develop a Tideflats Subarea Plan for adoption by the City of Tacoma as part of the City's Comprehensive Plan.

The Plan area is based on the current Port of Tacoma Manufacturing Industrial Center (MIC) which is defined both in the Puget Sound Regional Council's VISION 2040 as well as the City of Tacoma Comprehensive Plan. However, studies and recommendations from the Plan process will likely extend beyond this Plan area, including the lands immediately adjacent to the MIC and depending on the topic under review (air and water quality, traffic impacts, freight corridors, land use transitions, economic impacts and strategies, etc.).

Prior Commission Actions:

- October 19, 2022 – Informational Briefing on City Council consideration of EIS Alternatives.
- August 3, 2022 – Submitted scoping comments for City Council consideration.
- May 18, 2022 – Overview of SEPA scoping process, proposed alternatives, and engagement.
- March 16, 2022 – Status update on planning progress; reviewed Work Plan.
- October 2, 2019 – Reviewed the Tideflats Subarea Planning Work Plan.
- March 4, 2020 – Provided input on the public engagement plan.

Staff Contact:

- Stephen Atkinson, Principal Planner, satkinson@cityoftacoma.org, (253) 905-4146
- Project webpage: www.cityoftacoma.org/tideflatsplan

Attachments:

- Attachment 1: Draft Public Scoping Comment Summary

cc. Peter Huffman, Director