



AGENDA

MEETING: Regular Meeting (Hybrid)
DATE/TIME: Wednesday, October 16, 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

B. Approval of Agenda

C. Approval of Minutes

There are no meeting minutes to approve.

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. One Tacoma Comprehensive Plan Update – Historic Preservation

- Description: Review the Historic Preservation Element of the One Tacoma Plan.
- Action: Informational.
- Contact: Reuben McKnight (RMCKNIGH@cityoftacoma.org)



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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.

2. Planning Commission Annual Report and Work Program

- Description: Review and consider approval of the Planning Commission Annual Report for 2023-2024 and Work Program for 2024-2026.
- Action: Review and Consider Approval.
- Staff Contact: Brian Boudet (BBoudet@cityoftacoma.org)

G. Upcoming Meetings (Tentative Agendas)

(1) Agenda for the November 6, 2024, meeting:

- Comprehensive Plan Periodic Review – Transportation, Design & Development

(2) Agenda for the November 20, 2024, meeting:

- Comprehensive Plan Periodic Review – Economic Development, Environment, Engagement

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, October 23, 2024, at 4:30 p.m.; the agenda (tentatively) includes presentations on impact fee scope of work and right-of-way design manual. (Held at 747 Market Street, Tacoma, WA 98402, Conference Room 248 or virtually at <http://www.zoom.us/j/87829056704>, passcode 614650)

I. Adjournment



City of Tacoma
Planning and Development Services

**Agenda Item
F1**

To: Planning Commission
From: Reuben McKnight, Historic Preservation
Subject: **One Tacoma Comprehensive Plan Update – Historic Preservation**
Memo Date: October 9, 2024
Meeting Date: October 16, 2024

Action Requested:
Informational.

Discussion:

Historic Preservation staff will present an overview of the existing Historic Preservation Element of the Comprehensive Plan, adopted in 2011, and lead a discussion regarding proposed future updates to the element, including:

- Remove as a program element and inclusion as full element within the Comprehensive Plan
- Reorganization of the existing policies and goals to improve integration and alignment with the policies elsewhere in the Comprehensive Plan, as well as other City policy priorities, and to remove redundancies.
- Revision of the element to address critical policy areas currently not included or underdeveloped in the historic preservation element, including housing and equitable growth, diversity, equity, inclusion and anti-racism, and sustainability and other related areas.
- Improved treatment of cultural resources and Tribal concerns
- Align policy framework with anticipated code amendments in 2025, particularly regarding the process for local historic district creation and management, and the relationship between the Landmarks and Planning Commissions.

In particular, staff is seeking guidance from the Planning Commission in the following areas:

1. Affirming the recommendations contained in the Baseline Report in Section 2.3, regarding the previous review of the Historic District Moratorium (p. 11)
2. Feedback regarding Section 2B “Key Policies and Issues,” specifically concerning “Equity Framework and Design Review” beginning on page 15 and the “Nomination Criteria and Process” beginning on page 17.



Project Summary and Background:

This update is part of the scheduled update to Tacoma's Comprehensive Plan, [One Tacoma](#), which is the City's official statement concerning its vision for future growth and development. It identifies goals, policies, and strategies for maintaining the health, welfare, and quality of life of Tacoma's residents. The Comprehensive Plan is comprised of numerous individual elements, including elements addressing such important issues as urban form, design and development, environment and watershed health, parks and recreation, housing, economic development, and transportation and infrastructure.

The City of Tacoma amends its Comprehensive Plan on an annual basis as permitted by state law. In addition to these regular amendments, the [Growth Management Act](#) (GMA) requires counties and cities to periodically conduct a thorough review of their plans and regulations to bring them in line with any relevant changes in the GMA, and to accommodate updated growth targets. [RCW 36.70A.130](#) establishes the review procedures and schedule for Comprehensive Plan amendments and periodic review. Tacoma last completed such a "periodic update" in 2015 and is mandated to undertake and complete another "periodic update". The Historic Preservation Element was adopted by City Council in 2011 and converted to a Program Element of the One Tacoma plan in 2015.

In addition, the City of Tacoma is the designated "Metropolitan City" for Pierce County and is allocated, through [Vision 2050](#) and the [Countywide Planning Policies](#), to accommodate a significant share of the region's population and employment growth. The Puget Sound Regional Council evaluates and certifies local comprehensive plans for consistency with the multi-county planning policies (see the [Plan Review Manual](#), page 27). The Comprehensive Plan update will include a review and update to ensure consistency with the goals and policies of Vision 2050

Prior Actions:

- October 2, 2024: Reviewed planning requirements for the Urban Form Element
- September 18, 2024: Reviewed planning requirements for the Public Facilities + Services Element
- September 4, 2024: Reviewed planning requirements for the Parks + Recreation Element
- December 20, 2023: Recommended scope of work and engagement strategy
- June 21, 2023: Reviewed planning requirements for the Periodic Update

Background Documents:

- [Dept. of Commerce Checklist](#)
- [Vision 2050 Checklist](#)
- [One Tacoma Comprehensive Plan Update Work Plan](#)

Staff Contacts:

- Reuben McKnight, Historic Preservation Officer, rmcknigh@cityoftacoma.org
- Brian Boudet, Planning Services Division Manager, bboudet@cityoftacoma.org

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Attachments:

- Attachment 1: Assessment Report
- Attachment 2: DRAFT Baseline Conditions Report
- Attachment 3: [Current Historic Preservation Element - 2011 \(LINK\)](#)

cc. Peter Huffman, Director

PURPOSE

The City of Tacoma is updating its Comprehensive Plan One Tacoma to the year 2050. This is a major update for the City, with the last update to the plan occurring in 2015.

This document summarizes planned updates to the Comprehensive Plan Historic Preservation element.

ELEMENT OVERVIEW

The Historic Preservation Plan element that includes goals and policies relating to historic, cultural and archaeological sites within the City of Tacoma. The first Historic Preservation Element was adopted in 2006, and it was further expanded into a chapter in 2011.

The existing document is divided into several components, including

1. Administration – describes the operational structure of the historic preservation program
2. Identification – the survey and documentation of sites that may have historical or cultural significance
3. Management – the policies and tools for protecting important sites
4. Incentives and benefits – the means to encourage investment in historic properties either through direct financial benefits, or regulatory relief such as exceptions to certain building code or zoning provisions
5. Education – tools to build familiarity and awareness of historic and cultural sites
6. Advocacy – the promotion of policies and partnerships that support the mission and goals of the historic preservation program

The stated vision for historic preservation in the existing Historic Preservation Element include:

1. Historic resources are integral to the City's overall goals and objectives.
2. Historic resources convey the humanity of Tacoma.
3. Historic resources are key to the City's sustainability initiatives.
4. A network of individuals and organizations supports historic preservation throughout the community.
5. Historic Preservation is "horizontally integrated" into planning efforts.
6. The City's historic preservation program is readily accessible.
7. Historic preservation looks forward while valuing the past.

8. Historic preservation is solution oriented.
9. The preservation program guides treatment of historic resources.

Why does this matter?

Tacoma is a rapidly growing and changing city, with heavy demands on its existing form, including available housing. Many new residents from across the region and the country are arriving every year. At the same time, Tacoma is an older city by northwest standards, with a high number of intact historic resources still standing, and communities that care deeply about their histories and how these are manifested and enhanced by the built environment. Likewise, the land on which Tacoma was established has always been home to the Puyallup Tribe of Indians, who still reside and work in this region, and whose cultural imprints upon the land remain both above and below the ground, including sites of great cultural, historical and archaeological significance. As Tacoma grows and develops, the Historic Preservation Comprehensive Plan Element provides guidance for the development of tools, regulations and incentives to ensure that future development is balanced with the protection and enhancement of important cultural and historic sites, increases awareness of our shared histories, provides access to history and knowledge of Tacoma's past, and encourages sustainable development through adaptive reuse and architectural salvage and deconstruction. The Historic Preservation Element is about the future Tacoma, as much or more as it is about the past.

The City of Tacoma has had a historic preservation program since 1973. Like other cities, historic preservation as a policy area has roots in the environmental movement, and in many ways grew as a response to concerns over loss of community identity and sense of place resulting from urban renewal. In Tacoma, this began with historic designations of well-known landmarks such as Old City Hall and Union Station (1974), the Carnegie Library (Main Branch), First Presbyterian Church, Holy Rosary Church, Northern Pacific Headquarters, Pantages Theater, Stadium High School and Seymour Conservatory, and others (1975). In 1978, Old City Hall was the first local historic district established, followed by the Union Depot Warehouse Historic District (1983), the North Slope Historic District (1994), and the Wedge Neighborhood Historic District (2011). Today, there are 190 individually listed City Landmarks, and 4 locally listed historic districts.

Similarly, there are many properties and districts listed on the Washington State Heritage Register and the National Register of Historic Places. In Tacoma, all of the locally listed historic districts are also on the National Register of Historic Places, and there are several that are listed on the National Register but not local, including Stadium Seminary National Historic District (1977), South J Street National Historic District (1986), Buckley's Addition National Historic District (2016) and College Park National Historic District (2017).

There have been several proposals for the creation of additional local historic districts that have not been successfully implemented. These include Old Town (most recently proposed in 2010), West Slope Conservation District (2016), and College Park (2021-22).

The Pacific Avenue Historic District, between S 13th and S 15th, was removed from the historic register and demolished in 1986, leaving the Luzon as its sole building until it too was demolished in 2009.

The public policy benefits of historic preservation are well documented, but some benefits include:

- Historic buildings can be part of a built environment that retains a sense of uniqueness and identity, and can serve to encourage historical awareness and understanding.
- Historic preservation is an economic multiplier; existing buildings that are repurposed attract investment not only into the structures themselves, but also attract heritage tourism. In Tacoma alone, historic renovations have resulted in \$308 million in capital investments from private projects, not including public sector projects such as the UW-Tacoma Campus and Union Station Federal Courthouse.
- Historic rehabilitation is also a sustainable development strategy particularly for cities with a large stock of older buildings, including for the development of housing. In Tacoma \$174 million has been invested into 45 historic renovations with multifamily units.

As with many land use and planning tools, there are current challenges to overcome in historic preservation policies and regulations. Historic designation affects what individuals may do with their properties and has been perceived as a barrier to investment and development; like zoning and other land use tools, historic preservation can be misused to achieve other aims or be at odds with other policy priorities.

Additionally, the benefits of historic preservation have not been equitably distributed geographically or demographically. As a small program area with limited resources, the historic preservation program has long relied on citizen and community advocacy for historic nominations, for example, which contributes to an outcome that is largely dependent on community capacity and desire. Similarly, the nomination process and the design review requirements associated with historic preservation is a barrier that has not yet been addressed in a broad, systematic manner.

The intent of this update is to begin to address these and other issues.

PRELIMINARY CHANGES

Historic Preservation

Structure

- Remove as a program element in book 2 and make into a full element of the comprehensive plan
- Connect Historic Preservation to equitable growth, neighborhood change, and addressing cultural needs of existing and new residents, particularly for the Black community and other underrepresented groups.
- Remove redundancy and siloed policies that have related policies elsewhere in the plan (design development, for example)
- Improve treatment of Tribal concerns
- Incorporate recommendations for code updates anticipated in 2025

GMA CONSISTENCY

The Historic Preservation Element is consistent with the Growth Management Act by providing policy guidance for the following:

1. Identification of significant lands, sites, and structures that have historic or archaeological significance through survey and documentation, and review for development impacts on historic and culturally significant sites.
2. Encourage the preservation of significant sites through the historic nomination and designation process, the use of preservation tools and incentives, and design review.

BACKGROUND

Policy Framework

State and regional policies

Growth Management Act Goals and Policies (RCW 36.70A)

Per RCW and WAC statute, a comprehensive plan is not required to have an historic preservation element. However, GMA clearly recognizes the importance of historic and cultural resources as, alongside goals for promoting urban growth, reducing sprawl and protection the environment, it includes the following preservation goal as one of the 15 overarching goals of GMA:

(13) **Historic preservation.** Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance.

VISION 2050

The Multicounty Planning policies (VISION 2050) provide direction for a coordinated approach and consistency within local Comprehensive Plans that supports and helps execute the regional growth strategy.

The regional growth strategy focuses growth in designated centers and near transit stations to create healthy, equitable, vibrant communities well served by infrastructure and services. The strategy supports rural and resource lands as vital parts of the region that retain important cultural, economic, environmental, and rural lifestyle opportunities over the long term

VISION 2050 also offers guidance related to land use and development patterns. It the further development of healthy, walkable, compact, and equitable transit-oriented communities that maintain unique character and local culture. This includes conserving rural areas and creating and preserving open space and natural areas.

Policies and programs should:

Regional Growth Strategy

Development Patterns GOAL: The region creates healthy, walkable, compact, and equitable transit-oriented communities that maintain unique character and local culture, while conserving rural areas and creating and preserving open space and natural areas	Policy Reference
Preserve significant regional historic, visual, and cultural resources, including public views, landmarks, archaeological sites, historic and cultural landscapes, and areas of special character.	MPP-DP-6
Support urban design, historic preservation, and arts to enhance quality of life, support local culture, improve the natural and human-made environments, promote health and well-being, contribute to a prosperous economy, and increase the region’s resiliency in adapting to changes or adverse events.	MPP-DP-9

City policies

Addressing Priority Outcomes

In the first phase of the comprehensive planning process, the project team identified key outcomes that assess a baseline of wellbeing across a community. The 19 selected outcomes reflect the key themes for this plan update: equity, public health, sustainability, opportunity, and safety. Outcomes were evaluated geographically, comparing results across eight Tacoma neighborhoods. The **Historic Preservation** element broadly addresses these outcomes.

- Historic Preservation, including thematic representation, distribution of landmarks and districts.** The Tacoma Register of Historic Places identifies individual properties with ethnic and cultural historical representation, yet further work is needed to expand the ethnic and cultural groups represented to more accurately cover Tacoma’s history. An analysis of distribution of Historic Districts and Landmarks across Tacoma found disparities in the number of registered places relative to the cultural resources inventoried, particularly in the Eastside. While a completely balanced geographic distribution of resources is not anticipated, Historic Preservation policies can lead to a more equitable city by ensuring that registered places are considering the value of sites significant to a broader range of community groups in Tacoma.

To a lesser extent, Historic Preservation connects with a second project outcome, most closely linked with the City's Arts and Cultural Vitality Division. Although this outcome is managed by a department that is organizationally independent of the Historic Preservation Program and not represented in the Historic Preservation Element, it nonetheless is a measure of access to cultural and historic programs across the city.

2. **Cultural Vitality, including level of access to arts, culture, heritage programs.** The Tacoma 2025 Strategic Plan identified Arts and Cultural Vitality as one of seven key areas to promote equity and opportunity, especially for youth, in the city. The Community Survey shows varying levels of satisfaction with access to arts and culture by racial categories with Black residents feeling the least satisfied. Historic Preservation policies can help support equitable access to arts and cultural experiences by focusing on preserving and expanding programs in BIPOC communities.

Policy Audit

The below principles for plan development will be used when drafting language for this element update.

Structure and Content

- Strengthen the connection between goals and policies in all chapters
- If needed, aim for more goals and fewer policies per goal to maintain clear connections (some goals and policies currently read like a laundry list)
- Remove redundant language
- Connect everything to the Vision Statement and Focus Areas and reinforce the overall growth strategy
- Policy Chapters should be better connected to community engagement. Key opportunities for community engagement should be explicit.

Language

- Use more people-centered language that focuses on the experience that the City aims to create rather than the characteristics of the physical environment.
- Use more active language where possible. For example, use the core action rather than "strive to" or "consider"
- Identify accountable parties and parties where possible
- Use consistent terms.

- Define and use a consistent set of terms for geographies – centers, outside centers, residential pattern areas, neighborhood council districts, council districts, basins/watersheds.
- Use a consistent term or terms for those we intend to serve with the plan. There were several uses of the word “citizen”
- Recommend using *community member* as the most inclusive term (of visitors and workers) and *resident* when specifically referring to those who live in Tacoma.
- Finalize the vision statement and use the language consistently.
- Be more specific about equity terms, existing disparities (reference baseline conditions), and priority groups.

COMMUNITY INPUT

The Project Team compiled qualitative data from nine community visioning workshops and categorized it into overarching themes representing community priorities for Tacoma’s growth over the next 25 years. Additionally, the Project Team reviewed community input gathered through previous engagement activities that occurred between 2016 to present day in the Tacoma Existing Engagement Gap Analysis report.

Historic Preservation

Historic preservation was a focus of the Comprehensive Plan engagement through community workshops across each neighborhood and the online “Ideas Wall”. Residents were asked to choose historic places to preserve and whether they felt their community’s history is reflected or preserved in their neighborhood or across Tacoma. Overall, community members want to preserve places that are meaningful to them to showcase the diversity of Tacoma’s cultural legacy and history of the land. Specific responses varied by neighborhood, and included:

- Residents in the West End are lacking a sense of place and do not feel that there are enough locally recognized historic places and landmarks.
- In Central Tacoma, community members shared that there are several sites important to the Black community in Hilltop that should be considered for preservation efforts.
- Some residents of the South End, South Tacoma, and Eastside noted the wish to preserve culturally diverse community spaces and businesses like B&I Public Marketplace. Community members also noted the difficulty and inaccessibility of the Historic Landmarks and District nomination process leading to less diverse representation in the City’s designated historic places.

City of Tacoma, Washington

**Agenda Item F1
Attachment 2**

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

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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:

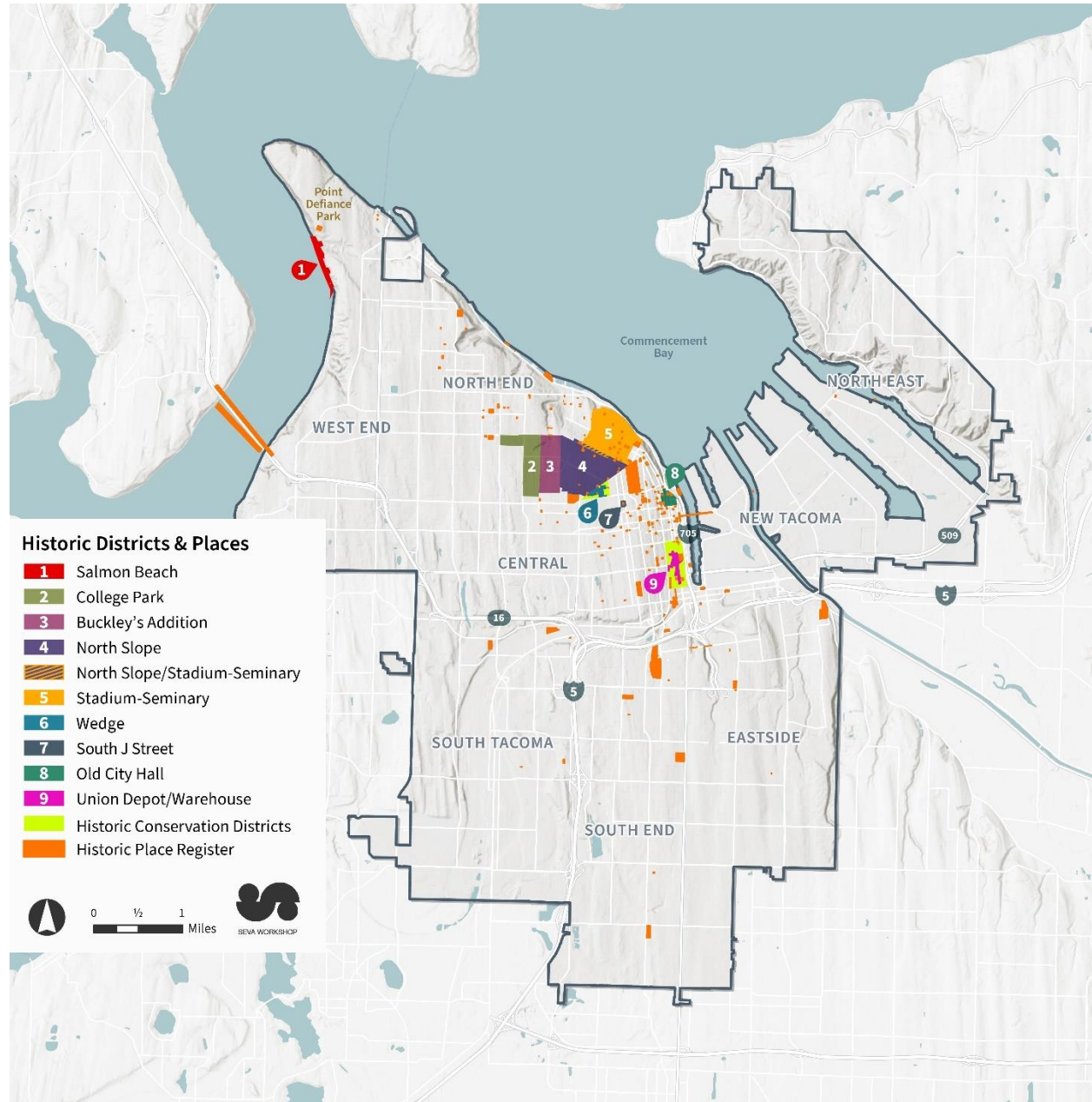
- Old City Hall Historic District
- North Slope Historic District
- Union Depot/Warehouse Historic District and Union Station Conservation District
- Wedge Neighborhood Historic and Conservation Districts

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.¹

Exhibit 1: Tacoma Historic Resources Inventory, 2024.



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

¹ 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.²

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 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

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

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 over-arching 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.



City of Tacoma
Planning and Development Services

**Agenda Item
F2**

To: Planning Commission
From: Brian Boudet, Division Manager, Planning & Development Services
Subject: **Planning Commission Annual Report and Work Program**
Memo Date: October 9, 2024
Meeting Date: October 16, 2024

Action Requested:
Review and Approval

Discussion:

At the next meeting on October 16, 2024, the Planning Commission will review and consider approving the draft Planning Commission Annual Report and Work Program (revised draft attached) that highlights the Commission's accomplishments between July 2023 and June 2024 and outlines planning projects to be carried out or initiated during the timeline of July 2024 through December 2026 or beyond.

The Planning Commission discussed an initial draft of the report on October 2, 2024. The revised draft provided here is based on input from the Commission during that discussion. The areas where there are notable changes from the initial draft have been highlighted in this revised version.

Upon approval by the Commission, the report will be presented to the IPS Committee for its review and concurrence. The IPS Committee is scheduled to review the Commission's report at their November 20 meeting.

Staff Contacts:

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Attachment:

- Planning Commission Annual Report and Work Program (Revised Draft)

c: Peter Huffman, Director





Planning Commission
Annual Report 2023-2024 and Work Program 2024-2026

(Revised Draft – October 16, 2024)

This report, prepared pursuant to the Tacoma Municipal Code Section 13.02.040.L, highlights the Planning Commission’s accomplishments between July 2023 and June 2024 and outlines the Commission’s work program for the general timeline of July 2024 through December 2026.

Part I. Accomplishments 2023-2024

A. Major Projects Reviewed:

1. Home in Tacoma Project – Phase 2

Home in Tacoma Phase 1, which was recommended by the Commission in May 2021 and adopted by the City Council in December 2021, set the stage for significant changes to Tacoma’s housing growth strategy, policies and programs to increase housing supply, affordability, and choice for current and future residents. The subsequent Home in Tacoma Phase 2 was launched in July 2021 and includes development of zoning, standards, infrastructure actions, and other implementation programs. This includes incorporation of modifications to expand flexibility for home-based and micro-businesses, as requested by the Council in Resolution 41259. The Commission has been reviewing Phase 2 since August 2021, conducted a public scoping hearing in April 2022, and will continue its review through 2023. The Commission finalized our recommendations to Council in June 2024. It is expected that Council will complete its review and adopt the final package in November 2024 (www.cityoftacoma.org/HomeinTacoma)

2. Design Review Program

In early 2019, the City launched an effort to develop a comprehensive Design Review Program to enhance the quality of the built environment throughout the City. The work was put on hold in early 2021 due to staffing changes. New staff were hired in late 2021 and assigned to complete the design guidance documents, develop administrative procedures, prepare land use code amendments, and potentially establish a Design Review Board. The Commission reviewed the project throughout 2022 and 2023 and finalized our recommendations to the City Council in October 2023. The Council adopted the new program and permitting requirements in May 2024. (www.cityoftacoma.org/UrbanDesign)

3. Neighborhood Planning Program

In response to a desire for more equitable delivery of services and to provide a grassroots response to neighborhoods’ concerns, the City Council provided funding in 2021 for a pilot Neighborhood Planning Program (NPP) and permanent funding in the 2022-23 biennial budget. The goal of the NPP is to support neighborhood identity and vitality. The Council also identified McKinley Hill and Proctor as the first two neighborhoods representing different locations on the spectrum of neighborhood development between growth creation and growth management. The first neighborhood plan, in

McKinley, was adopted in March 2023. For the second effort, in Proctor, the Commission provided its recommendations in December 2023 and the Council adopted the Proctor Neighborhood Plan in February 2024. The Commission has also been involved in the South Tacoma Way Neighborhood Plan effort, and is expected to make a recommendation to Council in early 2024. (www.cityoftacoma.org/NeighborhoodPlanning)

4. South Tacoma Groundwater Protection District (STGPD) – Moratorium and Code Update

On June 28, 2022, the City Council adopted Amended Substitute Resolution No. 40985, approving the Work Plan for the South Tacoma Groundwater Protection District (STGPD) Code Amendments. The Council also requested that the Planning Commission evaluate whether a temporary moratorium on heavy industrial uses and storage of hazardous materials within the STGPD is warranted. The Commission made its recommendations regarding the moratorium in August 2022 and the Council adopted the moratorium in March 2023. Additionally, the Commission initiated the project to review the STGPD code provisions. The Commission is expected to make recommendations to Council on the STGPD code in Spring 2025. (www.cityoftacoma.org/MoratoriumSTGPD)

5. College Park Historic Special Review District (resubmittal)

The proposal for the College Park Historic Special Review District was re-submitted to the Landmarks Preservation Commission in March 2023, who then forwarded the nomination to the Planning Commission. In accordance with the Tacoma Municipal Code, the Planning Commission conducted an initial assessment of the application to determine whether the proposal should be accepted for review. In August 2023, the Commission voted to decline to consider the resubmitted application, finding that issues raised during the first review of this proposal and resultant recommendations made by both the Landmarks Preservation Commission and Planning Commission have yet to be implemented. (www.cityoftacoma.org/CollegeParkHD)

6. Local Historic Districts – Moratorium

On June 20, 2023, the Tacoma City Council adopted Resolution No. 41226, directing the Planning Commission to conduct a public process to determine whether a moratorium on local historic district creation is warranted, and if so, to recommend a scope and schedule. The Commission held a public hearing on the potential moratorium and coordinated with the Landmarks Preservation Commission to get their input. The Landmarks Preservation Commission made a recommendation on October 25, 2025 and the Planning Commission finalized its recommendations on November 15, 2023. The Council adopted the Historic District Moratorium in April 2024 (Resolution 41226). ([Local Historic Overlay District Moratorium - City of Tacoma](http://www.cityoftacoma.org/LocalHistoricOverlayDistrictMoratorium-CityofTacoma))

7. Capital Facilities Program (CFP)

The Commission reviewed the proposed update to the 2025-2030 CFP beginning in March 2024 and conducted a public hearing in June. The Commission finalized its recommendations in July 2024. In addition to recommending adoption of the updated CFP, the Commission also recommended that the City, primarily through the Comprehensive Plan Periodic Update, continue to work to improve the prioritization process for capital facilities and associated spending to better ensure alignment with the City's goals. It is expected that the Council will adopt the final CFP in late 2024, in coordination with the biennial budget process. ([2025-2026 Biennial Budget Development - City of Tacoma](http://www.cityoftacoma.org/2025-2026BiennialBudgetDevelopment-CityofTacoma))

8. Permit Level of Service Code Update

This proposed code amendment modifies the adopted level of service requirements for various land use permit types and the public notice requirements. This amendment is designed to implement

recently adopted State law – Senate Bill 5290 and House Bill 1105 – which were designed to streamline permitting, increase accountability around permit timelines, and improved clarity in public notices. The Planning Commission completed its review and finalized its recommendations in June 2024. The City Council is expected to make a decision on these code amendments in December 2024.

9. Tideflats Subarea Plan and EIS

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 and EIS that would establish a shared, long-term vision and a coordinated approach to addressing development, environmental review, land use, economy, public services and facilities, and transportation in the area. The Commission has received periodic updates since 2019. It is expected that the Tideflats Steering Committee will finalize its recommendation before the end of 2024, at which point the Commission will hold a public hearing in early 2025 before making final recommendations to the Council. (www.cityoftacoma.org/TideflatsPlan)

10. Pacific Avenue Corridor Subarea Plan and EIS – “Picture Pac Ave”

In recognition of the significance of Pacific Avenue as Pierce County’s first Enhanced Bus Service line, the City of Tacoma, Pierce Transit, and the State Department of Commerce have partnered to fund and develop a subarea plan and programmatic EIS for the 4.5-mile-long portion of Pacific Avenue between I-5 and S. 96th Street. The “Picture Pac Ave” subarea planning process will create a shared long-term vision and more coordinated approach to development, environmental review, and strategic capital investments along the corridor. The Commission began to review the project in June 2022 and will continue its review into 2025, with an expected recommendation coming in mid-2025. (www.cityoftacoma.org/PicturePacAve)

11. Comprehensive Plan Periodic Update – “One Tacoma”

The Commission initiated review for the state-mandated periodic update of the City’s Comprehensive Plan in early 2023. The Commission began discussions about the general timeline, phases, scope considerations, and potential key projects and priorities. The Commission is expected to make its recommendations on the Comprehensive Plan Update in early 2025, in preparation for a Council decision in mid-2025. (www.cityoftacoma.org/OneTacoma)

B. Meetings Conducted / Attended:

1. Commission Meetings:

The Commission held 20 regular meetings and canceled 4 meetings between July 2023 and June 2024. The Commission also held two special meetings in May/June 2024 to allow additional deliberations on the Home in Tacoma package. The Commission also conducted the following public hearings:

- August 16, 2023 – Urban Design Project Review
- September 20, 2023 – Historic District Moratorium
- March 6, 2024 – Home in Tacoma Phase 2
- June 5, 2024 – Capital Facilities Program 2025-2030
- June 5, 2024 – Permitting Level of Service Code Amendment

2. Community Meetings:

Individual Commissioners have been actively involved in various community groups, meetings, open houses, and events, including but not limited to the following:

- Design Review Project Advisory Group meetings
- Housing Equity Taskforce meetings (jointly with the Human Rights Commission)
- Home in Tacoma Project Informational Meetings
- Tideflats Subarea Planning Project Community Meetings
- Spotlight South Tacoma Community Meetings
- One Tacoma Community Meetings and Events
- McKinley Hill Neighborhood Plan Program Events
- Proctor Neighborhood Plan Program Events
- South Tacoma Neighborhood Plan Program Events
- Facilities Advisory Committee (FAC)

In addition, the Commission has formed a joint task force with the Transportation Commission regarding transit-oriented development and to facilitate coordination between the two commissions on key projects, as Council requested in Resolution No. 41195 (adopted May 9, 2023). The Transit-Oriented Development Task Force is meeting on a monthly basis.

C. Membership Status (June 2023 through July 2024):

Council District / Expertise Area	Commissioner	Appointment
District No. 1	Jordon Rash	Appointed in July 2023
District No. 2	Morgan Dorner	Appointed in January 2022 Reappointed in July 2024
District No. 3	Brett Santhuff / Payton Swinford	Commissioner Santhuff served through June 2024 Commissioner Swinford appointed in July 2024
District No. 4	Sandesh Sadalge / <i>Vacant</i>	Appointed in July 2023, resigned in July 2024 <i>Position is currently vacant</i>
District No. 5	Robb Krehbiel	Appointed in January 2022 Reappointed in July 2024
Development Community	Anthony Steele	Appointed in January 2022 Reappointed in July 2023 Elected Vice-Chair in August 2023
Environmental Community	Brett Marlo	Appointed in July 2022
Public Transportation	Christopher Karnes	Appointed in September 2019 Reappointed in July 2023 Elected Vice-Chair in October 2021 Elected Chair in July 2022
Architecture, Historic Preservation, and/or Urban Design	Matthew Martenson	Appointed in July 2022



Planning Commission Work Program (2024-2026)

(Revised Draft – October 16, 2024)

The Planning Commission Work Program contains projects and planning activities slated for completion or substantial progress during the general timeframe of July 2024 through December 2026. These projects and activities are primarily mandated by legislation or initiated by the City Council and are within the Commission’s review and recommendation authority. The Work Program is subject to ongoing review and adjustment in response to legislative requirements, community requests, Council priorities, budget and staffing constraints, or other emerging situations.

Expected Completion in Remainder of 2024

- **Home in Tacoma Project – Phase 2:** *Council Action November 2024*
 - Zoning, standards, affordability, anti-displacement, infrastructure, and programmatic components (includes zoning-related items from ADU Accelerator discussion, evaluation of shipping containers for housing, etc.)
 - Middle Housing Allowances (House Bill 1110 and House Bill 2321)
 - Home Occupation/Micro-businesses Expansion (Resolution No. 41259)
 - Residential Parking Code Update (Senate Bill 6015)
- **Consolidating Local Permit Review Processes:** *Council Action December 2024*
 - Implementation of State Senate Bill 5290 and House Bill 1105
- **2025-2030 Capital Facilities Program (CFP)** *Council Action December 2024 (with Budget)*

Expected Work Program for 2025 (preliminary)

- **Neighborhood Planning Program – South Tacoma Neighborhood Plan**
- **South Tacoma Groundwater Protection District – Phase 1B (Code Update)**
 - Associated Moratorium (Ordinance 28872)
 - Includes expanded scope (as outlined in the updated Work Plan) to include issues such as impervious surface limitations, trees/landscaping requirements, integration of a Health Impact Assessment, and coordination with other efforts like the Tacoma Water Integrated Resource Plan
- **Tideflats Subarea Plan and EIS**
- **GMA Comprehensive Plan Periodic Update:**
 - Key Focus Areas:
 - New Growth Allocations – including factoring in Home in Tacoma, PSRC’s Vision 2050, and State-mandated affordable housing allocations
 - Transportation Master Plan Update – New Functional Elements, Vision Zero, Multi-modal Level of Service standards, Transit planning and coordination

- 15-Minute Neighborhoods (complete, compact and connected)
- Puyallup Tribal Comprehensive Plan – Recognition and coordination
- Historic Preservation Plan – Integration and policy updates, including local historic districts
- South Tacoma Groundwater Protection District – Policies update
- Public Health, Safety and Equity – Based on Equity Assessment, Community Safety Action Strategy, and Health Impact Assessment pilot program with TPCHD
- Economic Development Element Update – Based on Green Economy Strategy
- Actionable Goals and Performance Measures – To support communications, effectiveness and tracking
- Minor Code Amendments
- **Historic Districts Nomination Process Code Update**
 - Associated Moratorium (Ordinance 28962)
- **Cushman/Adams Substation Reuse Study** (in partnership with TPU)
- **Pacific Avenue Corridor Subarea Plan and EIS (“Picture Pac Ave”)**
- **Neighborhood Planning Program – Program Evaluation**
- **Critical Areas Preservation Ordinance Update**
 - Including biodiversity corridors

Expected Work Program for 2026 (*very preliminary*)

- **Enhanced Services Facilities/Special Needs Housing Code Update**
 - Per Resolution 41311
- **Marijuana Equity Program Code Update**
 - Implementation of State Senate Bill 5080
- **High-Density Residential Zoning Update**
 - To ensure consistency with Home in Tacoma’s new residential zoning structure
- **Parking Update**
 - Including Reduced Parking Area, refinements along expanded light rail, mixed-use centers, and outstanding issues from Home in Tacoma
- **Landscaping/Tree Code Improvements**
 - Including consistency with recent updates, such as Home in Tacoma and STGPD, enhanced flexibility, planting guidelines, tree preservation (in coordination with ES)
- **Mixed-Use Centers Code Updates**
 - Including Core/Pedestrian Street review and height bonus program
- **Commercial Zoning Update – Phase 2**
- **2026 Amendment Package**
 - Including private applications (application deadline 7/31/2025)
- **2027-2032 Capital Facilities Program (CFP)**
- **Neighborhood Planning Program – Additional Planning Efforts** (pending program evaluation and budget consideration)
- **South Tacoma Economic Green Zone – Subarea Plan (*pending budget consideration*)**

Other Notable Upcoming Projects

- **Home in Tacoma 3-Year Review – To be completed in 2027**
- **Shoreline Master Program Update – Required by State to be completed by 2029**
- **New Climate Element for the Comprehensive Plan – Required by State to be completed by 2029**
 - Including updated ADA Transition Plan, Climate Resiliency sub-element, Emergency Response and Management, Greenhouse Gas and Reduction Plan)
- **Mid-Cycle (5-year) Comprehensive Plan Review – Required by State to be completed by 2029**

On-going Planning Issues

- Six-Year Comprehensive Transportation Program
- Joint Planning Commission/Transportation Commission TOD Task Force (per Council Resolution)
- Joint Meetings of the Planning Commission with appropriate groups (e.g., the Landmarks Preservation Commission, Transportation Commission, and Community Council)
- Transportation Master Plan Implementation, in coordination with the Transportation Commission (e.g., impact fees study, transportation network planning, streetscape design guidance, such as Tacoma Ave., signature trails development, etc.)
- Light Rail Expansion projects (including the Hilltop Links to Opportunity Program, ST3 Tacoma Dome Link Extension, Tacoma-TCC Link Extension, Sounder Station Access Improvements, etc.)
- Pierce Transit Long-Range Plan, Stream System Expansion Study (SSES) and Pacific Avenue BRT Project
- Citizen Participation, Notification, Language Access, and Public Outreach Enhancements
- Proactive Equity/Social Justice/Anti-Racism integration in policies and programs
- Schuster Corridor Trail
- Subarea Plan Implementation – North Downtown, South Downtown, Hilltop, and Tacoma Mall Neighborhood
- McKinley Neighborhood Plan implementation and tracking
- Proctor Neighborhood Plan implementation and tracking
- South Tacoma Way Neighborhood Plan implementation and tracking
- Home in Tacoma implementation and tracking
- Urban Design Program implementation and tracking
- Urban Forestry implementation and tracking
- **Economic Development implementation and tracking**
- Fossil Fuel Tracking and Council Reporting
- Historic Preservation, in coordination with the Landmarks Preservation Commission (e.g., Historic TDR, integration of Historic Preservation Plan with *One Tacoma* Comprehensive Plan, historic districts process and standards, preservation incentive tools, educational programs, etc.)

Regional and Cross-Jurisdictional Issues

- Regional Transportation Issues, in coordination with the Transportation Commission (e.g., Tacoma LINK and Central LINK Light Rail Expansions, Pierce Transit Long-Range Plan and BRT Project)
- PSRC Regional Centers Framework Update, Vision 2050 implementation, GMA review

- PCRC County-Wide Planning Policies, County-level Centers Update, Population Allocations, Buildable Lands, Annexations and Pre-Annexation Planning
- Regional/Countywide Climate planning and coordination (Pierce County Climate Collaborative)
- Tribal Planning Coordination

Emerging Issues

These items are generally not integrated into the current work program and are dependent on future program space, priorities, funding, etc. Additionally, staff and the Commission regularly look for opportunities to integrate these items into other, larger projects when appropriate. These are listed in no particular order.

- Health Impact Assessments (*in partnership with TPCHD, after review of pilot*)
- Corridor Plans, focused on TOD corridor planning, such as Portland Avenue, 6th Avenue, and 19th Street (19th Street is a particular priority to support and ensure coordination with the planned Sound Transit TCC light rail extension)
- Station-Area Planning, such as Portland Avenue/I-5 area and “Four Corners” at James Center/TCC Mixed-Use Center (Portland Avenue/I-5 is a particular priority to support and ensure coordination with the upcoming Sound Transit Tacoma Dome Link Extension project)
- Crime Prevention Through Environmental Design (CPTED) policy and code review (*potentially coming out of Crime Prevention Plan*)
- Potential Local Historic Districts (*coordinated with LPC*)
- Street Typology and Designation System Review
- Wildfire Adaptation and Mitigation (*from Sustainable Tacoma Commission*)
- Urban Heat Island review/considerations (*from Sustainable Tacoma Commission*)
- Parks and Open Space Planning (*in coordination with MetroParks Tacoma and Tacoma School District*)
- Subarea Plan review/updates – North Downtown, South Downtown, Hilltop and Tacoma Mall Neighborhood (including street designation review)
- Sign Code Update
- Pre-Annexation Planning – Browns Point/Dash Point, Parkland/Spanaway (*with Pierce County*)
- Transfer of Development Rights (TDR) program review
- SENCO SNAP review/integration
- Unified Development Code
- Institutional Master Plans
- “Dark Sky” lighting standards (*from JBLM AICUZ study*)
- Trail-Oriented Design Standards
- Zoning Code conversion to web-based, linked format