

**From:** J Corso <jcorso695@gmail.com>  
**Sent:** Wednesday, February 28, 2024 1:17 PM  
**To:** City Clerk's Office; McKnight, Reuben; McKnight, Reuben; Johnson, Susan; Rumbaugh, Sarah; Walker, Kristina; Diaz, Olgy; Daniels, Kiara; Woodards, Victoria  
**Subject:** Resolution No. 41355: Oppose

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Dear Tacoma City Council Members,

I oppose Resolution No. 41355, the proposed moratorium on the nomination and designation of new Historic Special Review and Conservation Districts (HSRCD), for any period of time for the following reasons.

First, the city council has already given the Planning Commission (PC) the authority to refuse to put any new nominations of HSRCDs on their meeting agendas.

Second, as the PC has recently demonstrated with the College Park Historic Special Review District nomination, when it agrees to hear a new nomination, debate its merits, and hear supporting and opposing arguments, it's able to exercise its authority to vote to advise the city council not to consider it.

Third, the Tacoma Municipal Code (TMC) doesn't allow the designation of new HSRCDs by right. The TMC is written to make this process completely discretionary, meaning that the city council has already given itself the authority to approve or deny new nominations.

Fourth, for decades, the city council members representing east and south Tacoma have lamented that no one has taken the initiative to nominate an HSRCD in their council districts. Clearly, a moratorium on new nominations will make it even more difficult for Tacomans in City Council Districts #3, #4 and #5 to nominate an HSRCD in their neighborhood.

Given the city's DEI policy, and given that the city already has at least three easy ways to stop new HSRCD nominations, and given that CM Rumbaugh hasn't articulated a coherent reason for needing a moratorium too, I advise the city council to vote against adopting Resolution 41355.

Sincerely,

Geoff  
John Geoffrey Corso  
701 N J St, Tacoma

**From:** John Butler <johnny.butler.72@gmail.com>  
**Sent:** Wednesday, February 28, 2024 8:34 PM  
**To:** City Clerk's Office  
**Subject:** Historic districts, oppose moratorium.

**Follow Up Flag:** Flag for follow up  
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Why are the planners trying to demonize old neighborhoods?  
Please vote to oppose a moratorium on historic districts.  
Thank you.

**From:** ADRIA HEMBREE <skoonus@comcast.net>  
**Sent:** Wednesday, February 28, 2024 8:54 PM  
**To:** City Clerk's Office  
**Subject:** Historic District moratorium

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Hello To the People Making Decisions for Tacoma:

I oppose a moratorium on historic districts. It is not necessary!

Tacoma is a large city. Please start building housing in OTHER AREAS and NEIGHBORHOODS besides the North End!! This is getting ridiculous....please adventure out to the other areas and add housing to them....OR....here is a wild idea: Start converting all the empty buildings into housing. It is obvious that Tacoma has a lot to use.

Please stop making unnecessary rules...Tacoma needs so much more, like filled pot holes.  
Just an idea.....

Tax paying and Voting Tacoma Citizen:  
Adria Hembree

**From:** Ranell <private-idaho@comcast.net>  
**Sent:** Thursday, February 29, 2024 11:12 AM  
**To:** City Clerk's Office  
**Subject:** Historic District Moratorium

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Dear Tacoma City Council,

I oppose a moratorium on historic districts. This is absolutely unnecessary.

Warm regards,  
Ranell Nyström  
1409 N 6th Street  
Tacoma WA 98403  
206-240-8305

**From:** Ruby Collins <rubysdesigns3@gmail.com>  
**Sent:** Thursday, February 29, 2024 12:04 PM  
**To:** City Clerk's Office  
**Subject:** Historic District moratorium

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Hello City Council,

I live in the historic district and "I oppose a moratorium on historic districts" This is completely unnecessary!  
Ruby Collins  
710 N M Street  
Tacoma, WA 98403

**From:** C T <cthach24@gmail.com>  
**Sent:** Thursday, February 29, 2024 12:45 PM  
**To:** City Clerk's Office  
**Subject:** Local Historic Overlay District Moratorium

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Hello,

My name is Cris and I currently live the North Slope Historic District. I am writing to state that I am in opposition of the moratorium that is being proposed for historic districts. Living in North Slope, there are many benefits to proclaiming parts of Tacoma as Historic Districts. One of my favorite thing about living in this neighborhood is taking walks and admiring all the old victorian houses. I think creating a moratorium may allow time for these neighborhoods to change and lose what makes them historic in the first place.

Thank you,

Cris

**From:** Caroline Woodhams <linamwood@gmail.com>  
**Sent:** Thursday, February 29, 2024 12:49 PM  
**To:** City Clerk's Office  
**Subject:** Moratorium on Historic Districts

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

I oppose the moratorium on Historic Districts that Sarah Rumbaugh is proposing to City Council.

Caroline Woodhams  
620 N M St.  
Tacoma, WA 98403

**From:** Sean Sullivan <sullivanj73@yahoo.com>  
**Sent:** Thursday, February 29, 2024 12:56 PM  
**To:** City Clerk's Office  
**Subject:** Historic District Moratorium and HiT2 Public Hearing

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Dear City Clerk,

I oppose a moratorium on historic districts in Tacoma.

Additionally, I oppose any zoning plan that allows further changes away from Single family units. It is poor planning from City Council to further populate and density of an already congested area of Tacoma.

I oppose The Home in Tacoma proposal because despite the promises made, it promotes less sun, less trees, less sustainability. There is a significant impact to the quality of life in Tacoma if the proposal is successful.

Thank you,  
Sean Sullivan  
616 N Cushman  
Tacoma, WA  
(909)214-0305

**From:** Colleen . <colleen@mtcinsurancesolutions.com>  
**Sent:** Thursday, February 29, 2024 1:05 PM  
**To:** City Clerk's Office  
**Subject:** Opposed to Moratorium on Historic District

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Dear Sarah Rumbaugh,  
I am seriously opposed to moratorium of the Historic Districts that you are proposing to City Council. Colleen Carney, owner of a Historic Home.

**From:** Kristofer Nyström <knystrom2@comcast.net>  
**Sent:** Thursday, February 29, 2024 1:23 PM  
**To:** City Clerk's Office  
**Subject:** Historic District Moratorium

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

>> Dear Tacoma City Council,

>>

>> I oppose a moratorium on historic districts. This is absolutely unnecessary.

>>

>> Warm regards,

>> Kristofer Nyström

>> 1409 N 6th Street

>> Tacoma WA 98403

>> 206-240-8305

**From:** Andrew Favreau <andrew.d.favreau@gmail.com>  
**Sent:** Thursday, February 29, 2024 2:14 PM  
**To:** City Clerk's Office  
**Subject:** Moratorium on Local Historic Districts

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

I oppose the moratorium on Historic Districts that Sarah Rumbaugh is proposing to City Council.

Andrew Favreau  
Homeowner  
616 N L Street  
Tacoma, WA 98403

**From:** Judith Martin <judithkmartin@outlook.com>  
**Sent:** Thursday, February 29, 2024 2:23 PM  
**To:** City Clerk's Office  
**Cc:** Judith Martin  
**Subject:** Sarah Rumbaugh's Proposed Moratorium on Historic Districts

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

I'm opposed to any moratorium on Historic Districts ,including the one proposed by Sarah Rumbaugh.

Sincerely,

Judith Martin  
515 North M St.  
Tacoma

**From:** Carlyn Crawford <ccrawford529@gmail.com>  
**Sent:** Thursday, February 29, 2024 2:41 PM  
**To:** City Clerk's Office  
**Subject:** Sarah Rumbaugh

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

"I oppose the moratorium on Historic Districts that Sarah Rumbaugh is proposing to City Council".

Sincerely,  
Carlyn Crawford  
505 North M Street  
Tacoma, WA 98403

**From:** Michael Lafreniere <info@historictacoma.org>  
**Sent:** Thursday, February 29, 2024 7:32 PM  
**To:** City Clerk's Office  
**Subject:** Council Public Hearing (03/05/2024) Comment for the Record - Proposed Historic District Moratorium  
**Attachments:** Letter to the City Council re Moratorium Public Hearing.pdf

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

On behalf of Historic Tacoma's board of directors, I am submitting the attached letter for distribution to the City Council Members, City Manager and City Attorney as public comment for the record. It pertains to the March 5, 2024 public hearing on a proposed moratorium on the nomination and designation of new Historic Special Review and Conservation Districts, i.e., the proposed Historic District Moratorium.

Michael Lafreniere  
Communications Director  
(253) 228-0925





February 27, 2024

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ADVOCACY.  
PRESERVATION.

www.HistoricTacoma.org

Board of Directors

- Bill Baarsma
- Jennifer Baersten
- Kathleen Brooker
- Steve Dunkelberger
- Ross Griffith
- Marshall McClintock

Staff

Michael Lafreniere,  
Outreach & Communications  
Director

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@HistoricTacoma

 on Threads  
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 info@historictacoma.org

Mailing Address  
PO Box 7664  
Tacoma, WA 98417-0664

Members, Tacoma City Council  
747 Market Street.  
Tacoma, WA 98402

RE: Proposed Moratorium on Historic Districts

Dear Honorable City Council Members:

Historic Tacoma submits these comments in opposition to the proposed moratorium on historic districts and asks that the Council reject this proposal. We also ask that this letter and its attachments be part of the City’s record on this matter.

Normally, local governments adopt moratoria with respect to land uses that are permitted *as of right* to prevent those uses from vesting under current law and to allow the local government to enact code changes that will apply to those land uses. The important term here is “*permitted as of right*.” Historic districts are not permitted as of right; they are discretionary decisions by the Council. Also, unlike other types of land use decisions, there is no time frame required for a decision. Therefore, there is simply no need for a moratorium. To the extent that there is any support for the contention that a historic district application would “waste time,” we note that the waste of time results from the Landmarks Preservation Commission (LPC) being second-guessed by the Planning Commission, which lacks LPC’s expertise in historic preservation.

That raises the question of what the Council’s real intent is with respect to historic districts. We note that no similar moratoria are being proposed for other types of land use approvals, such as View Sensitive Districts. Given that Home in Tacoma is likely to incentivize the replacement of older, owner-occupied homes with rental apartments, we have serious concerns about what this moratorium means for the future of historic preservation in Tacoma as well as for future opportunities for home ownership.

**The proposed moratorium is inconsistent with the Growth Management Act.**

Local governments planning under the Growth Management Act (GMA) are required to adopt development regulations that are consistent with GMA. A moratorium is a development regulation and must comply with the goals of the GMA set out in RCW 36.70A.020; see e.g., *State of Washington, Dept. of Corrections v. City of Lakewood*, GMHB No. 05-3-0043c (FDO, Jan. 31, 2006). In that case the Growth Management Hearings Board held that Lakewood’s moratorium violated GMA goals in RCW 36.70A.020 and it was invalidated. Tacoma’s proposed historic district moratorium is also inconsistent with several of the goals of the GMA.

One of GMA’s goals is “*Historic preservation. Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance*” [RCW 36.70A.020(13)]. By preventing new or expanded historic districts from even briefly being considered, the moratorium is inconsistent with and undermines this goal.

Historic preservation also preserves older, more affordable housing. One of GMA's goals is "*accommodate housing affordable to all economic segments of the population of this state*" and to "*encourage preservation of existing housing stock,*" per RCW 36.70A.020(4). By limiting demolition, historic preservation can help to preserve existing and more affordable housing stock.<sup>1</sup> The proposed moratorium is inconsistent with these goals.

Several of Tacoma's older neighborhoods are populated by our city's underserved communities. One of the major advantages of historic district designation is that it allows homeowners to claim a special property tax benefit for restoration work on homes that are contributing structures. This is the only property tax benefit available to individual homeowners. By denying historic district designation to lower-income neighborhoods and neighborhoods of color, the City will be denying those residents access to the kind of property tax benefits available to existing historic districts and owners of individually designated buildings.

Historic Tacoma has been working with residents of the McKinley and South Tacoma neighborhoods to develop more historic preservation opportunities in communities that are largely minority and/or lower income. In fact, the City has funded work to inventory and identify historic buildings in these neighborhoods. This work will be delayed if not entirely discouraged by the City's proposed moratorium. It also denies people in these neighborhoods the opportunity to benefit from growth and stability in home value that creates greater generational wealth for populations that have been historically denied these opportunities.

Historic preservation retains older buildings that were built with old growth timber, which is extremely durable and sequesters carbon. Refusing to consider actions to preserve these buildings is inconsistent with GMA's goal of ensuring that development regulations "*adapt to and mitigate the effects of a changing climate*" [RCW 36.70A.020(14)]. For the same reason, the moratorium is also inconsistent with the City's declared "climate emergency." See attachment, "*Why Do Old Places Matter? Sustainability.*"- National Trust for Historic Preservation, Oct. 30, 2014, <https://savingplaces.org/stories/why-do-old-places-matter-sustainability>.

### **The moratorium is inconsistent with Tacoma's Comprehensive Plan.**

In addition to being contrary to and undermining the goals of GMA, the proposed moratorium is also inconsistent with many sections of the City of Tacoma Comprehensive Plan. An extensive list of these sections is provided with this letter; see Exhibit 1. GMA requires that development regulations be consistent with and implement a local government's comprehensive plan, per RCW 36.70A.040 and *Cossalman v. Town of Eatonville*, CPSGMHB No. 05-3-0032 (Order on Motions June 20, 2005). This is another example of how the proposed moratorium is inconsistent with GMA.

### **Historic preservation preserves smaller and more affordable "starter" homes and older, less expensive apartments.**

Builders are typically not building starter homes. Historic preservation is a good tool for preserving already existing, smaller starter homes, which are typically older homes, and which are an important part of addressing our housing shortage. A moratorium on historic districts eliminates a significant tool available to neighborhoods to preserve these small homes and will leave them vulnerable to demolition. By making demolition of existing homes much less likely, historic preservation tends to mitigate the significant adverse effects of rapid growth such as gentrification and displacement.

Unlike our older neighborhoods, many neighborhoods in Tacoma and elsewhere in Pierce County are protected from demolition and more intense redevelopment because of single family covenants and

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<sup>1</sup> Aaron Pasell, *Preserving Neighborhoods: How urban policy and community strategy shape Baltimore and Brooklyn*, Columbia University Press, 2021.

protections like Tacoma's View Sensitive Districts. Demolition and redevelopment will consequently be concentrated in older neighborhoods with smaller homes that can be demolished in entire blocks for redevelopment. This has the effect of removing smaller, more affordable homes, displacing those who rent those homes and eliminating home-buying opportunities for first-time homebuyers and lower income people.

Likewise, we need to preserve smaller, older apartment buildings that are more likely to be locally owned and more affordable than new construction. While the City could consider other types of protections or overlay zones for preserving existing housing, historic preservation is currently the only tool available.

### **Historic preservation has created economic benefits for Tacoma.**

The City of Tacoma has benefited greatly from historic preservation efforts, including from development in historic districts. The former Elks Temple that is now McMenamins is part of a historic district; it was not individually listed as a historic structure. That designation as a contributing structure to a historic district allowed the condemnation and eventual repurposing of a historic structure into a thriving business. The University of Washington Tacoma campus is another example of the preservation and re-purposing of historic buildings that has resulted in revitalization of a significant area in the city as well as the economic growth that comes from having a major university located in the city. Furthermore, the City has recently seen downtown office buildings being converted to needed housing with the help of the special tax benefits for restoring historic structures. The proposed moratorium stands to discourage similar downtown redevelopment.

### **Tacoma's inadequate tree canopy will benefit from creating new historic districts.**

Tacoma is suffering from a serious lack of tree canopy that will only be degraded further if home preservation and ownership are further discouraged. Landlords generally don't like trees as they must maintain them, which costs money. Homeowners are far more likely to plant new trees and maintain existing ones. Historic preservation of older neighborhoods will expand the opportunity of homeownership in our city and help prevent the removal of existing trees.

### **The Planning Commission's recommendation ignores the overwhelming public opposition to this proposed moratorium and dismisses the expertise of the Landmarks Preservation Commission.**

The Planning Commission's letter to the Council, which does not appear to have been approved in an open meeting, minimizes the fact that nearly ninety percent of the public comments received on this issue were in opposition to the proposed moratorium. The Planning Commission also fails to clearly state that the lengthy and detailed letter provided by the Landmarks Preservation Commission (LPC) was **in complete and unanimous opposition to the moratorium**; see Exhibit 2. LPC's members have much greater expertise in historic preservation and are much more familiar with ongoing efforts at preservation and best practices both regionally and nationally.

Further, the Planning Commission's comment that the LPC "may need time to evaluate the current program components for how they may or may not have unintentionally contributed to [systemic racism]" is in complete contradiction to the response of the LPC to the first nomination of the proposed College Park Historic District. In fact, after a lengthy and transparent public process, the LPC recognized and directly called out issues of equity within historic preservation and formally recommended revisions and updates to the program to address equity issues. The LPC is in favor of changes that will increase equity in our city and recognized that a moratorium will do more to damage historic preservation than improve equitable outcomes.

The Council should rely more heavily on the expertise and analysis of the Landmarks Preservation Commission rather than the unsupported contentions of the Planning Commission.

For the foregoing reasons, Historic Tacoma requests that the City Council reject the proposed moratorium on historic districts.

Sincerely,



Jennifer Baersten, President  
Historic Tacoma Board of Directors

Exhibits:

1. Comprehensive Plan References Relevant to Historic Preservation and Proposed Moratorium
2. Letter from Landmarks Preservation Commission to Planning Commission re Moratorium

Attachments:

1. *"Why Do Old Places Matter? Sustainability."* National Trust for Historic Preservation, Oct. 30, 2014; <https://savingplaces.org/stories/why-do-old-places-matter-sustainability>
2. *"Older housing is affordable housing,"* The Planning Report: Insider's Guide to Planning & Infrastructure, March 17, 2020
3. *"Preservation Positive Los Angeles"* Study Executive Summary, Place Economics, published by Los Angeles Conservancy, 2020

cc: City Councilmembers  
Elizabeth Pauli, City Manager  
Chris Bacha, City Attorney

## Exhibit 1

### City of Tacoma Comprehensive Plan References Relevant to Historic Preservation and Proposed Moratorium

#### Design + Development Chapter:

- Goal DD–5 Ensure long-term resilience in the design of buildings, streets and open spaces, including the ability to adjust to changing demographics, climate, and economy, and withstand and recover from natural disasters.
  - Policy DD–5.11 **Protect and enhance defining places** and features of centers and corridors, **including landmarks, natural features, and historic and cultural resources.**
  - Policy DD–5.12 **Protect, restore, and improve historic buildings** in centers and corridors on adopted inventories.
- Goal DD–6 Protect and preserve designated significant scenic resources, including public views and scenic sites.
  - Policy DD–6.1 **Enhance and celebrate significant places** throughout Tacoma with symbolic features or iconic structures that reinforce local identity, histories, and cultures and contribute to wayfinding throughout the city. Wherever possible, engage artists to create context sensitive additions that enhance these places. Consider these especially at:
    - f) **Historically or culturally significant places**
- Goal DD–7 Support sustainable and resource efficient development and redevelopment.
  - Policy DD–7.1 **Encourage rehabilitation and adaptive reuse of buildings, especially those of historic or cultural significance**, to conserve natural resources, reduce waste, and demonstrate stewardship of the built environment.
- Goal DD-13 - **Protect and preserve Tacoma's historic and cultural character.**
  - Policy DD- 13.1 - **Encourage the protection and restoration of high-quality historic buildings** and places that contribute to the distinctive character and history of Tacoma's evolving urban environment.
  - Policy DD–13.5 Survey and **inventory historic resources** as part of future sub-area or neighborhood planning projects, with a focus on areas of anticipated growth and change.
  - Policy DD–13.6 Expand historic preservation inventories, regulations, and programs to **encourage historic preservation in areas that are underrepresented by current historic preservation efforts.**
  - Policy DD–13.8 Encourage the protection and enhancement of cultural heritage structures and sites as valuable and important public assets.
  - Policy DD–13.11 **Discourage the unnecessary demolition of older viable and historically significant structures** through a range of methods including:
    - a) Develop regulations that **encourage** new development on vacant or underutilized spaces and **reuse of existing structures.**
    - b) Develop a proactive survey program for the identification, documentation and **preservation of historically and culturally significant buildings in all areas of the City,** particularly those historically underserved and underrepresented
    - c) Expand current demolition review code language to protect structures of historical or cultural significance outside of current historic districts.
    - d) Avoid creating an economic incentive for demolitions within Historic Districts.

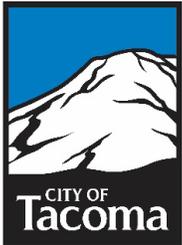
- Policy DD-13.12 Encourage infill that is architecturally compatible within surrounding contexts through appropriate scale and design controls both within Historic Districts and citywide.
- Policy DD-13.13 Take measures to reduce waste stream impacts resulting from demolition such as developing architectural salvage requirements for demolition permits and supporting the reuse of building materials.

#### **Economic Development Chapter:**

- Goal ED-5 Create a city brand and image that supports economic growth and leverages existing cultural, community and economic assets.
  - Policy ED-5.9 Encourage preservation and adaptive reuse of the City's historic building inventory and leverage such efforts in branding and marketing efforts.

#### **Historic Preservation Chapter:**

- HP-2 Integrate Tacoma's historic resources into community planning efforts.
  - Action HP-2A Encourage neighborhood-level preservation and conservation programs.
- HP-3 Promote preservation's role in community sustainability efforts.
  - Action HP-3E Use historic structures to highlight green building practices.
  - Action HP-3F Encourage the implementation of sustainability plans in historic districts.
- HP-4 Include sustainability objectives in an update to the City's historic design guidelines.
- HP-5 Use the City's programs to promote the link between preservation and sustainability.
- HP-7 Leverage the economic development opportunities provided by Tacoma's historic resources.
  - Action HP-7A Market Tacoma for heritage tourism.
- HP-10 Integrate historic preservation policies into citywide planning efforts.
- HP-11 Capitalize on and promote historic resources in community planning efforts.
  - Action HP-11A Promote urban development strategies that are compatible with historic preservation.
- HP-12 Promote best practices in the City of Tacoma's stewardship of historic resources.
- HP-15 Maintain a certified historic preservation program.
- HP-26 Use zoning tools to promote historic preservation goals and support an overall heritage conservation system.
- HP-32 Promote financial incentives that stimulate investment in historic properties.
- HP-33 Enhance regulatory incentives to encourage preservation and conservation.



## Landmarks Preservation Commission

### Planning and Development Services Department

October 25, 2023

Chris Karnes, Chair  
Tacoma Planning Commission

Dear Chair Karnes and Members of the Planning Commission:

On behalf of the Landmarks Preservation Commission, I am transmitting this letter in response to the request for feedback and recommendations regarding the proposed moratorium on local historic districts as directed by Council Resolution 41226. The Landmarks Commission has reviewed the public testimony as well as the questions posed by the Planning Commission and used both to guide our response, which we would request be sent as an attachment to the Planning Commission's recommendation when transmitted to Council.

As the City's subject matter expert on historic preservation, it is essential to first state our opposition to the proposed moratorium, as we believe it is not necessary. While the Commission appreciates the support of City Council, it is our position that a moratorium is not warranted given the relative infrequency of historic district nominations, and believe that any benefit is likely outweighed by potential negative consequences both practically and by perception. The Landmarks Commission also notes that a strong majority of respondents to the Public Hearing on September 20 were opposed to the proposal.

Both the Landmarks Commission and the Planning Commission have previously identified the need for improvements to the policy and code framework that governs the City's historic preservation program. Nonetheless, we believe that the Landmarks Commission currently possesses the tools to review and make recommendations for discretionary applications such as historic nominations. Our comments are limited to the merits of a proposed moratorium, and are not intended to speak to future code updates or the merits of any specific proposals.

The specific questions posed by the Planning Commission and our answers are incorporated into this letter below.

#### Topic: Necessity of a moratorium

1. Are there pending or anticipated historic district nominations within the potential period of a moratorium?

The Commission agrees generally with the observations from many commentors that community driven historic district nominations require extensive time and resources, often done by volunteers. This work involves not only research and documentation but also extensive outreach to generate support. Because of these factors, historic district nominations are relatively infrequent, and the Landmarks Commission is not aware of any current efforts aside from the recent College Park nomination that are currently in development.

Because of the lead time in creating local historic district nominations, Commission is concerned that a moratorium could result in a "chilling effect" that would have a "knock-on" effect that could negatively impact district creation for some time following the end of a moratorium, if one were to be adopted. For example, if a community group decided to begin the process of researching a

nomination at this time, the Commission typically would not expect to see any formal submittal for a year or more. A moratorium could be interpreted by residents to mean that historic district proposals are not viable, and thus discourage any future efforts even long after the moratorium is concluded.

2. Does the Landmarks Commission believe that a moratorium would assist the Commission during the upcoming comprehensive plan review?

The Commission believes that because historic district nominations are infrequent, there is unlikely to be a review of any new historic district proposals within the timeframe leading up to the Comprehensive Plan amendment process in 2024. If such a proposal is received, the Commission believes it possesses the capacity to review and make a recommendation in addition to its present workload.

3. If there was not a moratorium and a new nomination was submitted, does the Landmarks Commission believe that it could review the nomination at the same time it is working on improving the code and comprehensive plan policies, particularly regarding improving equitable outcomes?

The Commission appreciates concerns with its workload and capacity. However, due to the infrequency of historic district nominations, the Commission finds this scenario to be unlikely. The Commission believes that it has the capacity to review incoming nominations concurrently with its planned policy and code review.

4. If there was a new district nomination submitted now, does the Landmarks Commission believe that it currently has appropriate guidelines and criteria that would enable it to make a recommendation, and is there adequate guidance for establishing appropriate design guidelines for new development and redevelopment?

The Commission believes that while the current code framework needs improvement, this does not render the existing process and code non-functional. Consequently, the Commission believes that it currently possesses adequate tools to review and make recommendations for historic district nominations.

Topic: Potential negative effects of a moratorium

1. Will a moratorium prevent historic tax incentives from being available for historic projects?

The establishment of a moratorium will not affect local tax incentives for existing local districts or Federal tax credits, as applicable for current and future National Register Historic Districts.

However, for future proposed local residential districts there may be a delayed effect from a moratorium that slows or discourages development of new local historic districts, for the reasons stated previously. This is particularly concerning for future neighborhood efforts in underserved areas of the city, as it could diminish the viability of the local historic district as an enhancement tool for future neighborhood planning.

In addition, while individual listing on the historic register is always an option for property owners, many older “character” buildings in Tacoma may not meet historic significance criteria individually. However, as a collective group of period buildings, they could still be considered an important contributor to a district. Put succinctly, in historic districts the sum is often greater than the parts.

2. Are there other negative effects on historic resources that would result from a temporary moratorium on historic district creation?

The Commission is concerned that a moratorium could be interpreted as a signal that the City does not support or places a low priority on local historic districts at a policy level, which could make the management of existing districts, particularly in terms of permit compliance, problematic.

Topic: Duration and scope of a moratorium

1. Is the current scope (all locally designated historic and conservation districts) appropriate, or should it be limited or defined (for example, a comment noted that there may be interest in expanding existing districts near University of Washington Tacoma)?

If a moratorium were to be adopted, the Commission recommends that expansion or alteration of boundaries of existing districts be excluded from the scope of the moratorium. However, the Commission does not support distinguishing different types of districts, such as “residential” versus “commercial” areas, as this suggests that one type is more important to the City than the other.

2. If a moratorium were recommended, does the Landmarks Commission have input on duration? For example, should the end of the moratorium coincide with the adoption of revised Municipal Code and Comprehensive Plan policies in 2024, or are there other considerations?

Although the Landmarks Commission does not support the proposed moratorium, if one is adopted, the Commission believes that it is critical to align it with the planned Comprehensive Plan amendment cycle, which to our understanding would conclude in late 2024. A six-month moratorium likely would not benefit the City in any way, and would likely create additional confusion and complexity if it terminates in the midst of policy amendment discussions.

In addition to the above comments, the Commission also believes that a moratorium will not improve equitable outcomes. While the planned amendments to the current policy and code framework will assist the Commissions in addressing issues of diversity, equity and inclusion in the nomination review process, such amendments *per se* will not resolve systemic and long-term issues, which will require ongoing effort beyond amending the code or comprehensive plan. Working towards improved outcomes is critical, but this is not a basis for adopting this moratorium.

Lastly, as a land use tool, the Commission believes that moratoria are generally more appropriate to address emergent issues with “by-right” development; that is, proposals that a City must approve by code even if known to be contrary to public welfare or policy. In this context, a moratorium can be appropriately used to pause permit review while the problematic regulations are addressed. For historic nominations, the review is discretionary, and both the Landmarks and Planning Commissions, and City Council, currently possess the authority to deny such applications without a moratorium.

We appreciate the opportunity to provide our input and recommendations in this process.

Sincerely,



Kevin Bartoy, Chair

# Why Do Old Places Matter? Sustainability

 [savingplaces.org/stories/why-do-old-places-matter-sustainability](http://savingplaces.org/stories/why-do-old-places-matter-sustainability)

October 30, 2014



• By: Thompson Mayes

Keeping and using old places is one of the most environmentally-sound things a person or community can do—more than building or buying anything new that claims to be “green.” As Carl Elefante, of Quinn-Evans Architects, brilliantly said, “the greenest building is... one that is already built.”<sup>1</sup> Yet it’s my perception that society at large doesn’t yet fully acknowledge the “green” values of keeping and reusing existing buildings and communities—in fact, old buildings are often viewed as throwaways and teardowns. Fortunately, a reuse ethic seems to be growing, and the benefits of reusing existing buildings and communities are becoming recognized more widely.

In this post, I hope to summarize some of the key takeaways from the work by the National Trust’s Preservation Green Lab, the Urban Land Institute, the Green Building Council, Smart Growth America, and others<sup>2</sup> in the hope that it will give people a brief look at the reasons that keeping and reusing old buildings and communities is “green.” But I also want to suggest that old places should themselves be viewed as part of the ecology we hope to sustain.

Here’s my quick summary of the reasons the continued use of old buildings and communities is environmentally sound:

- **Avoided Impact. Reusing old buildings avoids the environmental impacts of the extraction, processing and transportation of new materials and the construction processes.** As a Preservation Green Lab report, *The Greenest Building: Quantifying the Environmental Value of Building Reuse* states: “Building Reuse almost always yields fewer environmental impacts than new construction when comparing buildings of similar size and functionality” and “...it takes 10 to 80 years for a new building that is 30 percent more efficient than an average-performing existing building to overcome, through efficient operations, the negative climate change impacts related to the construction process.”<sup>3</sup>
- **Land Conservation. Continuing to use existing buildings and communities avoids or minimizes the use of forests, farms, wildlife habitat, and open space for new construction.** As SmartGrowthAmerica states: “...reusing already-developed land... preserves open spaces that are home to wildlife. Habitat loss is the main threat to 80% of the threatened and endangered species in the United States, but building within an existing community, rather than outside of town on a wild greenfield, helps preserve wildlife habitat, protect air and water quality and foster the strong economic growth that’s only possible in dense development.”<sup>4</sup>

- **Embodied Energy. Old buildings and communities embody the energy and carbon that was devoted to produce them**—the wood and coal used to fire the bricks, smelt the tin, forge the nails, saw and transport the timber. Although some critics argue that the concept of “embodied energy” doesn’t result in any positive impacts today or in the future, it remains true that it would be incredibly wasteful to discard these materials and their historical energy, and haul them to a landfill, adding to the environmental impact of demolition.<sup>5</sup>
- **Operating Energy. Many old buildings, because of the way they are designed, already use less operating energy than new buildings.** Again, from the Preservation Green Lab: “Building owners, developers, policy makers, and green-building experts often assume that it is preferable to build a new, energy-efficient building than to retrofit an older building to the same level of efficiency” yet “... data from the U.S. Energy Information Administration (EIA) demonstrates that commercial buildings constructed before 1920 use less energy, per square foot, than buildings from any other decade of construction.”<sup>6</sup> While this is not true for all older buildings, many old buildings are inherently green.
- **Passive Design. Older buildings were often designed to take advantage of naturally occurring energy**, like the light well at the Wing Luke Museum that I mentioned in the post on Architecture, or the transom windows in Main Street commercial buildings, like the one at my partner’s store, HomeRule, on 14<sup>th</sup> Street in DC. Many designers are recognizing anew the inherent passive sustainable designs incorporated in older buildings. I’m reminded of a 1970s study of the farmhouses of the New River Valley in North Carolina. These farmhouses developed organically in response to the climate to take advantage of the landscape for warmth in the winter, coolness in the summer, and the gravity flow of water to the springhouses.
- **Transportation and Density. Older communities are often on existing transportation corridors, have greater density, and are close to workplaces so that fuel consumption from cars is minimized.** This has long been recognized as one of the benefits of the reuse of existing built communities because of the benefits for land conservation, and is one of the key principles of smart growth.<sup>7</sup>

All of these reasons—farmland conservation, habitat preservation, open-space preservation, reduced fuel consumption, avoidance of adverse impacts from the extraction and transportation of new materials, avoidance of new landfill material, and positive environmental passive design, and others—add up to a powerful rationale to continue to use, reuse and strengthen existing buildings and communities. The benefits of reusing existing buildings are now recognized by the Green Building Council in the credits awarded for reuse in the LEED certification calculation (although these may not adequately reflect the full environmental value of reuse).<sup>8</sup>

But there are more deeply philosophical ecological reasons to keep, maintain and reuse old places. First, older communities are organic systems developed over time, with their own distinctive cultures. They are themselves irreplaceable, if ever-changing, parts of our environment. Choosing not to continue to maintain and strengthen them essentially condemns a distinctive and unique community to a form of extinction. One aspect of this is captured by the writer and architect Kimberley Mok: “Building ‘green’ isn’t just about using the latest and greatest technologies—it can also be about preserving time-honored, local building traditions that respect regional cultures and have been proven to be climatically appropriate over the centuries.”<sup>9</sup>

Second, the building materials and craftsmanship also deserve respect, not only because of the environmental cost of extracting, transporting, making, and installing them, but also because of the fact that some of the materials and craftsmanship will never exist again. The floor of my little river cabin in West Virginia is made of chestnut from before the die-off of the chestnut trees. Like heart pine windows, wide pumpkin pine floorboards, old growth redwood siding and a host of other building elements, these materials may never be available again. Yet people who offered to buy the cabin before us planned to scrap it, seeing it as a teardown. It seems to me that throwing old floorboards and siding away is not only disrespectful to the materials and to the humans who labored to saw, plane, groove and install them, but inherently inconsistent with the very idea of sustainability.

In trying to envision a world that is more environmentally sustainable, I hope for a world where we are more appreciative of the communities, buildings and things that already exist, and that we continue to use them, so that we're not constantly tearing buildings down and throwing things away. Unthinking consumerism—including some allegedly “green” consumerism—contributes to many of our environmental problems, including stoking climate change. While I may not be much of a consumer, I am a materialist. I value buildings and the meaning they have for us. I value objects, and the meanings they have for me. The political theorist Jane Bennett, in her book *Vibrant Matter*, notes the way objects seem to call to us, and advocates for a re-thinking of our relationship with objects and materials as a way of shifting our political ecology. As the website Cultivating Alternatives summarized the idea, “Bennett thinks that if we paid attention to the aliveness of matter, we wouldn't be so careless with our stuff.”<sup>10</sup> Being “careless with our stuff” contributes to a throwaway mentality that is environmentally damaging.

Something about Bennett's theory about things resonates with me, and I imagine with others who see meaning in our existing built environment, and who have a respect for materials, buildings and practices that have preceded us. Some people have questioned whether our current view of sustainability may be too narrowly measured by a limited assessment of carbon footprint, and may not adequately take into account other factors, including the factor of time. Scott Doyon, Principal of Placemakers, in his post on considering soul as a part of green building practice, states, “If you tear down a storied and graceful historic building—hand-built and rooted in tradition, in which generations of people have crisscrossed into and through each others lives—and replace it with a high-performance, modular gizmo-green equivalent, how much embedded energy is lost if you also count the loss of soul?”<sup>11</sup> He goes on to ask whether a place that has no soul will have the longevity necessary for it to be truly sustainable over time.

As I noted earlier, I'm delighted to see the current turn toward reuse, recycling of materials, and appreciation for old places. Some of the projects I've seen seem to reflect an idea from a quote I found in Jean Carroon's book *Sustainable Preservation: Greening Existing Buildings*: “The reuse and salvage in the project infuses it with a sense of connection, history and narrative. Every detail comes alive with a story of origins, disposal, and rebirth.”<sup>12</sup> I hope people become more aware of the fact that reusing not just materials, but whole existing buildings is good for the soul and the environment.

I suspect that the current low level of recognition of the green qualities of existing buildings and communities is partly because, as Carl Elefante has identified, we are “drunk on the new and now,” and therefore can't even see the obvious benefits of the old.<sup>13</sup> We are blanketed with advertisements for green products. The building industry is primarily interested in developing new communities. While I

support the development of green products and green communities, the predominance of those voices should not blind us to the reality that simply continuing to use the existing buildings, communities and things that we already have is one of the most environmentally sound (and soulful, and sustainably long-lasting) things that we can do. As Jim Lindberg, senior director of the Preservation Green Lab said to me, "There is intelligence as well as energy embodied in our older buildings and neighborhoods. These places have so much to teach us about adaptation, sustainability, and resilience."<sup>14</sup>

**Notes:**

1. Elefante, Carl. "The Greenest Building Is...One That Is Already Built" *Forum Journal*, Vol. 21. No. 4, Summer 2007.
2. Please refer to the materials from these organizations for the full reports and studies. See also the Fall 2010 *Forum Journal: Bridging Land Conservation and Historic Preservation (Vol. 25, No. 1)*.
3. *The Greenest Building: Quantifying the Environmental Value of Building Reuse*. National Trust for Historic Preservation, 2011, vi. The analysis of older buildings uses Life Cycle Assessment to determine the environmental impact of a building over time. See *The Greenest Building*, 14-15.
4. *Smart growth protects natural habitat*. Accessed October 25, 2014.
5. See *The Greenest Building*, 20.
6. *The Greenest Building*, 18.
7. I take note of the argument made by Ed Glaeser, in *Triumph of the City*, and others, who advocate for replacing current older and historic buildings with high-rise buildings to increase density in urban areas. Fortunately, in addition to the voices crying out about the loss of livability, character, history, identity and memory that this would entail, more recent studies show that the avoided fuel impacts are better in areas where buildings are comparable to older and historic buildings, or approximately 3-6 stories tall, and that the environmental benefits are not better with densities that are greater. See Lloyd Alter *Is There a "Goldilocks Density"- Not Too High, Not Too Low, But Just Right?* Accessed 10/22/14. See also F. Kaid Benfield, *People Habitat*, (Washington, DC: People Habitat Communications, 2014).
8. Huppert, Mark. "Greenbuild 2013: LEED v4 Takes the Stage," December 13, 2013.
9. Mok, Kimberley, *Cool but endangered conical houses get preservation treatment in Indonesia*. Accessed October 23, 2014.
10. Summary: *Vibrant Matter* by Jane Bennett. Accessed October 28, 2014.
11. Doyon, Scott. "Let's Get Metaphysical: Considering the value of soul in redevelopment." Accessed October 28, 2014.
12. Leger Wanaselja Architecture, in Carroon, Jean. *Sustainable Preservation Greening Existing Buildings*, (Hoboken, New Jersey: John Wiley & Sons, 2010) 252.
13. Elefante, 37.
14. Email to the author, October 28, 2014.

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# Economic Argument for Historic Preservation: Older Housing is Affordable Housing

 [planningreport.com/2020/03/17/economic-argument-historic-preservation-older-housing-affordable-housing](https://planningreport.com/2020/03/17/economic-argument-historic-preservation-older-housing-affordable-housing)

*With state efforts to increase new housing production threatening local processes for identifying and preserving historic sites, buildings, and neighborhoods, the LA Conservancy, as part of its 40th anniversary celebration, recently published *Preservation Positive Los Angeles*. The study's goal: to unpack the economic impacts of historic preservation in Los Angeles. TPR interviewed the report's author, **Donovan Rypkema**, principal of PlaceEconomics, and LA Conservancy's **Adrian Scott Fine**, to highlight the report's myth-busting findings on the impacts of HPOZs on affordability, density, diversity, and economic resilience of neighborhoods across Los Angeles. Rypkema reminds state policymakers that preserving old, dense housing inherently preserves what the state asserts it most needs: affordable housing.*



Don Rypkema

"In LA, you have to build more housing, but step one is to—designation or not—quit tearing down stuff that provides affordable housing." —Don Rypkema

## **Elaborate on why the L.A. Conservancy commissioned a study to specifically examine the economic benefits of historic preservation in Los Angeles.**

**Adrian Scott Fine:** The L.A. Conservancy initially commissioned this report when we were celebrating our 40th anniversary. We had long wanted a data-based analysis to help make the case that preservation "pays." We began by looking primarily at the economics, then we broadened our scope to look at affordability, density, gentrification, etc. We wanted the study to address the tough issues.

Candidly, there were some surprises along the way. We had no idea that HPOZs in Los Angeles were going to be as diverse as they are, or have so many multi-family units. Public policy exchanges and Twitter chatter are focused mostly on how single family-homes and luxury housing stand in the way of building dense, affordable housing; and, HPOZs get lumped into that issue framing. Sadly, HPOZs are being attacked left and right as being the entities that stand in the way of providing affordable units. But that's not an accurate description of what's going on economically, as HPOZs actually are providing a lot of the multi-family housing.

It is important to note the nexus of density and affordable housing. Surely, density is part of the solution set; but a myopic focus on density doesn't necessarily mean you get affordable housing. In L.A., currently we're prioritizing density but losing affordable housing; it's contrary to the goal that the City of L.A. is espousing. This report sheds light

on that failure; our next step is to share this report with policy advocates and decision-makers who should be reading it. Ultimately, it is for the L.A. Conservancy to build an action agenda that translates the central findings of the report into policy recommendations.

**Donovan Rypkema, elaborate on the economic mission the L.A. Conservancy invited you to assume and the vital role of historic preservation in placemaking.**

**Donovan Rypkema:** Our approach was to cast a wide net. Adrian Scott Fine and Linda Dishman talked about key issues in play at the moment—housing, density, affordability, etc.—and asked us to look at what preservation is and how it’s positively affecting the city.

While there are a few exceptions, our basic approach is to examine historic neighborhoods rather than individual buildings. We looked at density, small businesses, start-ups, affordability, diversity, and a range of measurements about what’s happening in historic districts [HPOZs].

You’ve got some historic properties in L.A., and some of them are in an HPOZ. Some have a degree of oversight but to a lesser degree are the National Register districts that are not locally designated; but because of CEQA [California Environmental Quality Act], there is some review. You have individual monuments too. And then you have 30,000 or so properties that SurveyLA identified as eligible historic properties, but that aren’t under any protection.

Historic properties end up being about four percent of the city’s land area. You’ve got to have density and more housing, but you’ve got 94 percent of the city that doesn’t fall under any definition of historic. The idea that historic districts are what’s keeping us from having affordable housing and are responsible for gentrification is just nonsense.

**You’ve personally been doing city-level studies for three decades; what’s distinguishes the urban landscape of Los Angeles and its historic preservation challenges?**

A number of things— the patterns are consistent, but there were some very interesting deviations from other places. We’ve probably done a dozen city-level studies like this, including New York, Savannah, San Antonio, Raleigh, and Indianapolis. In terms of local protections found in Los Angeles, there are far fewer historic commercial districts than in most places, and that is reflected in lots of ways, including jobs. In Los Angeles, about 1.8 percent of all the jobs are in historic districts, whereas it’s 8 or 8.5 percent in New York City and 30 percent in Savannah.

For a lot of reasons – including L.A.’s bottom-up approach to nominating HPOZs – there’s a much lower share of commercial districts that are designated historic. That doesn’t mean it’s either good or bad, but it shows the pattern. What’s more pronounced in other places are the patterns of preference for small, start-up, and creative-industry businesses that, in other places, really show a statistical preference for being in historic neighborhoods. That’s just not demonstrable here, because there aren’t many designated historic commercial districts. There are plenty of great historic districts, but they’re residential neighborhoods, not commercial.

Another distinguishing feature we saw was diversity, because it was so counter to the cliché that historic districts are where rich, white people live. That’s not the pattern in Los Angeles at all. In fact, historic districts are statistically more diverse in terms of race, ethnicity, age, and income than in the city as a whole—even though historic zones include only 3 percent of the population and 4 percent of the parcels. It’s more than a demographic mirror of the city— it’s a greater reflection of the diversity of the city.

**How have you organized your research and ultimate findings?**

We understand it’s a major issue, so we looked at density in historic districts versus other residential areas, and it’s almost twice as much. In fact, the densest historic districts are decidedly denser than other areas of the city. When you look at the housing and transportation measures, it’s more affordable—or less unaffordable—in these historic districts than in the city as a whole.

There is a greater use of public transportation—24 percent—by people who live in historic districts. The other interesting thing is that when you look at the age curve and population by age, it's almost identical except for millennials. This finding about millennials is very consistent with national analysis that shows 34 percent of all homes, 44 percent of houses built between 1920 and 1960, and 54 percent of homes built before 1920 are bought by millennials.

I think this disproportional skew is driven by the three C's: the character of the neighborhoods, the cost of the housing, and the convenience.

**Compared to your other city-level examinations of historic preservation, what role do city rules, regulations, and protections won by the preservation movement over the years have on the economic resiliency of these neighborhoods?**

The most obvious impact is that the rate of demolition is measurably less. We looked at 20 years' worth of building permits—both number of permits and cost—and got lots of help from Ken Bernstein, whom I've known since he was at the Conservancy.

Another finding was that 22 percent of the dollars spent in historic districts was for new construction. This idea that somehow these neighborhoods are mummified or stuck in place is just not true.

In fact, it's not that the regulations dictate that a neighborhood has to stay the same forever and no change is acceptable, it's that the change that's made has to be in the character of the neighborhood. That's an appropriate role for regulation, and it really puts aside this idea that protections exist just to freeze these places in amber forever.

There was a great report that came out around the time we were starting our report from some researchers at UCLA in conjunction with UC Berkeley. They looked at all the neighborhoods in L.A. from 2000 to 2015 and identified—based on their definitions—all the neighborhoods that were gentrifying. We overlaid their map with all the HPOZs and found almost no correlation. There was some overlap, but 90 percent of their map had no historic designations.

The issue of housing affordability is true in every place, but it clearly has an order of magnitude greater impact here than in other cities. National Register districts that are not local districts have no HPOZ protections, but here there's at least a cursory review [through CEQA].

I do think there is an underutilization of federal tax credit in Los Angeles. It's a great tool that, for whatever reason, is not used as often and as completely here as it is in other places.

**What precisely, from your L.A. research, are the economic benefits of preserving these historic neighborhoods?**

Much of our approach is revealed preference analysis: Not asking what people think, but how they act. There's this decided pattern of young people and the creative class, knowledge workers, start-ups, and small businesses with a preference to be in historic neighborhoods because of the kind of character they represent. That has big economic implications.

We didn't spend a whole lot of time on it, but there's also an issue of labor intensity in rehabilitation versus new construction. As a general rule of thumb, if I'm building a new building in the United States today, half the money goes to labor and the other half for material. If I'm rehabilitating a historic building, it's going to be 60 to 70 percent labor. That difference means that if you spend a million dollars, you get more jobs and local income. The rehabilitation has a primary impact with the number of jobs, but there's a secondary impact because when you install a sink, the sink doesn't spend any money, but the plumber who installed it does. The greater share of labor, the greater the rollover effect is for local income.

Another economic benefit found in the report is the rate of appreciation of houses in historic districts outperforming the marketplace. Theoretically, it's less affordable, but when that's almost everybody's major asset, it makes a difference when the property is less subject to loss.

**“Density,” in the current California housing debates, is the key word. Speak to “density” from the point of view of this L.A. Conservancy commissioned research and study.**

One key finding is that historic districts in L.A. are denser than other neighborhoods. The second relates to ADUs (Accessory Dwelling Units). Preservationists in many places around the country are still fighting back, but I think preservationists in L.A. to a larger extent have just adopted ADUs as a positive. The good news about being in a local historic district is that there is some influence on the character, scale, and quality of what goes into those neighborhoods. It's a really enlightened and compromising position that the preservationists take in Los Angeles, and is untrue of other places.

The other thing is preservation-once-removed: We were tipped off to look at strip malls in L.A. There are 675 strip centers, 7 million square feet of building space, 24 million square feet of land area—almost all of it near transit. If you wanted to add density, there's the target.

We made a back of the envelope calculation that if you put four- or five-story buildings on those strip center lots, you could keep the 7 million square feet of commercial space, add 63,000 housing units with a parking space for each one of them without mucking up the neighborhoods around them. That's a huge amount of density without screwing up anything.

**The proposals on the table in the State Capitol this past year would've frozen the approval process of those HPOZs. If the evidence shows that preservation is the economically better choice for density and affordability, why is this not implemented?**

It would have frozen some, and it would've eliminated the restrictions of others. At least nine of the existing HPOZs would've been taken off the table if SB 50 passed.

No one gets into preservation to look at that. The motivation for preservation advocates is not real estate economics; it's the quality and character of the city and the embodiment of history that those buildings represent. However, economics do matter as preservation is competitive, cost-effective, and offers incentives that do not come with new construction. This study and others done across the country demonstrate the many ways preservation offers real value and cities should adopt policies that support it.

**Lastly, in an era where people don't read their newspapers, how do you make your point on the value of historic preservation?**

This is going to sound like artificial humility, and I don't mean it that way, but I got the Louise du Pont Crowninshield Award a couple of years ago from the National Trust for Historic Preservation, but the specific phrasing was for contributions, not achievements. I made some contributions, but I don't think the achievements have been met yet.

This issue is that basic information hasn't really translated into policy decisions as much as I think it should. It's hyperbolic, myth-driven nonsense that steps in the way of preservation.

Another thing that isn't as connected but improving is the environmental side of preservation. The environmental movement is so concerned with green gizmos that they've missed the obvious: By definition, if you tear down an old unit of housing, you tear down an affordable unit of housing. You can't build new and rent cheap, it cannot be done. In L.A., you have to build more housing, but step one is to—designation or not—quit tearing down stuff that provides affordable housing.

To read the full study, please visit [laconservancy.org/preservation-positive](http://laconservancy.org/preservation-positive).

# PRESERVATION

# POSITIVE

# LOS ANGELES

# EXECUTIVE SUMMARY

# EXECUTIVE SUMMARY

**Preservation Positive Los Angeles provides an in-depth look at historic preservation within L.A. and how historic places directly contribute to the overall livability of the city.** While anecdotally we know preservation and the reuse of older and historic buildings benefits peoples' lives, what has been missing—until now—is the data and analysis to fully back up these claims. This study demonstrates how preservation provides real value and positively impacts every Angeleno.

As the second-most populous city in the nation, L.A. is many things to many people. Yet fundamentally, it is a place where people create lives and homes: from those that are native-born to transplants arriving every day. It is through the historic built environment that Angelenos best learn about and understand the heritage of L.A., providing a tangible way to connect through a shared heritage and story.

Critics often claim that preservation limits growth, is anti-density, or stands in the way of affordable housing development. The data, however, shows a much different story where historic neighborhoods are proving that livability and preservation can work hand-in-hand. Historic preservation is not a barrier to growth as there is a lot of room to grow. **Only 6.2% of total parcels in L.A. have been identified as historic** through designation or by SurveyLA, leaving **93.8% available for new development, increased density, and much-needed housing.**

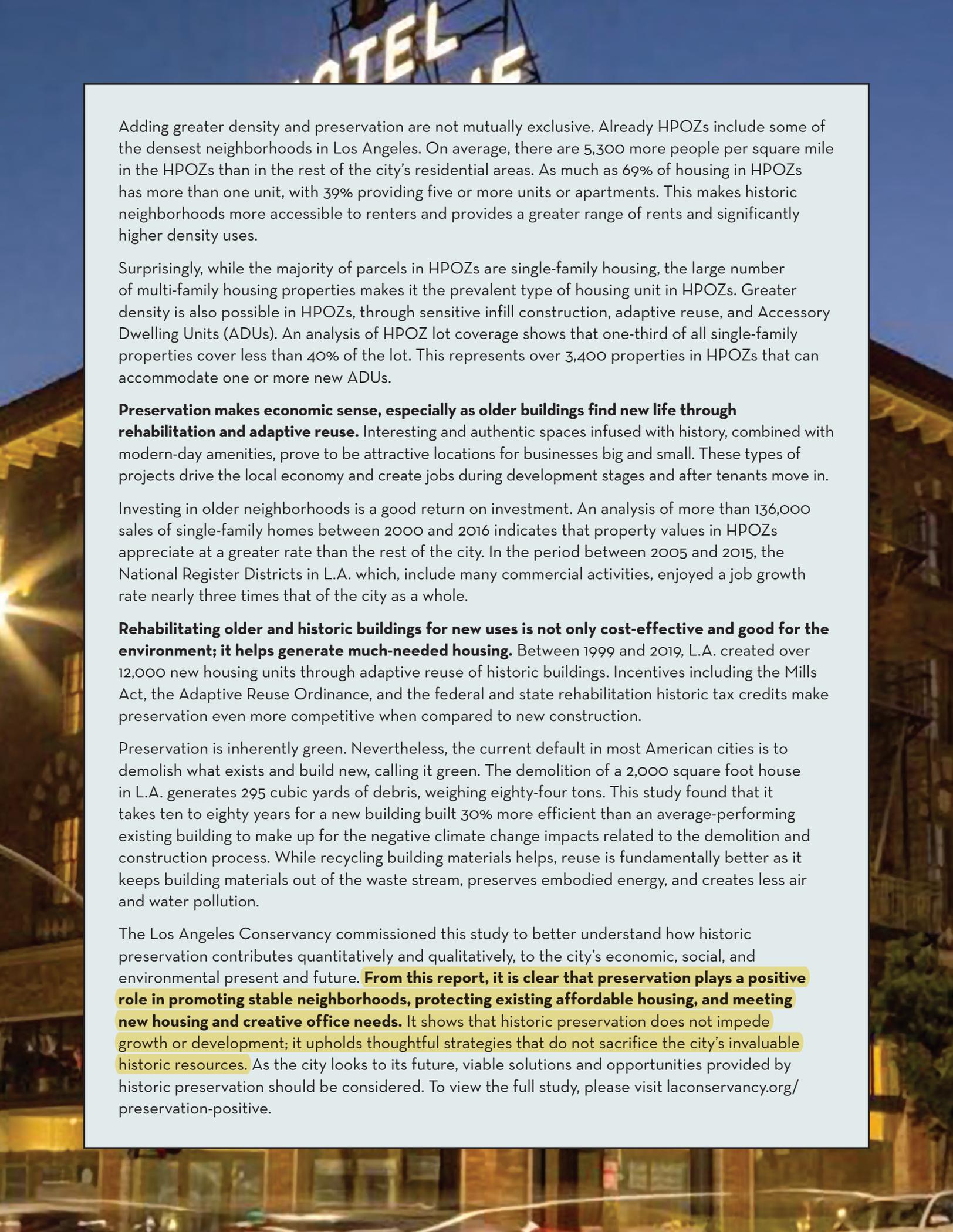
Preservation is affordable housing. As one of the most pressing concerns facing L.A. today, older, smaller, and mixed-use buildings represent the largest share of affordable housing in the city, from quaint bungalow courts to large garden apartment developments.

Historic Preservation Overlay Zones (HPOZs) also play a role in preserving the existing rent-controlled housing stock. While HPOZs are 2.4% of all parcels, they represent 5% of all units under rent control in the city. HPOZs are home to residents with a wide variety of incomes. A larger percentage of residents in HPOZs, than in the rest of the city, have annual household incomes of under \$25,000. The HPOZs of L.A. provide density at a human scale and protect affordable housing, mainly by providing a mix of housing options.

**While historic designation is not feasible or appropriate for every older property, HPOZs protect affordable housing, foster neighborhood stability, and serve as home to a racially and economically diverse population.** Today, single-family homeownership is no longer the only, or even the best indicator, of neighborhood stability. Longtime residents, be they owners or renters, are themselves a stabilizing force within a community—especially in HPOZs.

HPOZs are home to 3% of Los Angeles population and account for 5% of all long-term residents in the city as a whole. Renters, specifically, are disproportionately longer-term in HPOZs than in the rest of the city. Increasingly, renters are at great risk of displacement from property flipping, rising rents, condominium conversion, demolition, or Ellis Act evictions.

Cultural diversity is a backbone of the city's historic neighborhoods, which are more ethnically, racially, and income diverse than the rest of the city as a whole. Of the thirty-five HPOZs that currently exist, twenty-one have populations where there is a greater share of racial diversity than in the rest of the city. While they cover roughly 8.5 square miles of the city—just 1.8% of the city's land area as a whole—combined, they represent 3% of the population and households. Overall, 54% of residents in HPOZs identify as Latinx.



Adding greater density and preservation are not mutually exclusive. Already HPOZs include some of the densest neighborhoods in Los Angeles. On average, there are 5,300 more people per square mile in the HPOZs than in the rest of the city's residential areas. As much as 69% of housing in HPOZs has more than one unit, with 39% providing five or more units or apartments. This makes historic neighborhoods more accessible to renters and provides a greater range of rents and significantly higher density uses.

Surprisingly, while the majority of parcels in HPOZs are single-family housing, the large number of multi-family housing properties makes it the prevalent type of housing unit in HPOZs. Greater density is also possible in HPOZs, through sensitive infill construction, adaptive reuse, and Accessory Dwelling Units (ADUs). An analysis of HPOZ lot coverage shows that one-third of all single-family properties cover less than 40% of the lot. This represents over 3,400 properties in HPOZs that can accommodate one or more new ADUs.

**Preservation makes economic sense, especially as older buildings find new life through rehabilitation and adaptive reuse.** Interesting and authentic spaces infused with history, combined with modern-day amenities, prove to be attractive locations for businesses big and small. These types of projects drive the local economy and create jobs during development stages and after tenants move in.

Investing in older neighborhoods is a good return on investment. An analysis of more than 136,000 sales of single-family homes between 2000 and 2016 indicates that property values in HPOZs appreciate at a greater rate than the rest of the city. In the period between 2005 and 2015, the National Register Districts in L.A. which, include many commercial activities, enjoyed a job growth rate nearly three times that of the city as a whole.

**Rehabilitating older and historic buildings for new uses is not only cost-effective and good for the environment; it helps generate much-needed housing.** Between 1999 and 2019, L.A. created over 12,000 new housing units through adaptive reuse of historic buildings. Incentives including the Mills Act, the Adaptive Reuse Ordinance, and the federal and state rehabilitation historic tax credits make preservation even more competitive when compared to new construction.

Preservation is inherently green. Nevertheless, the current default in most American cities is to demolish what exists and build new, calling it green. The demolition of a 2,000 square foot house in L.A. generates 295 cubic yards of debris, weighing eighty-four tons. This study found that it takes ten to eighty years for a new building built 30% more efficient than an average-performing existing building to make up for the negative climate change impacts related to the demolition and construction process. While recycling building materials helps, reuse is fundamentally better as it keeps building materials out of the waste stream, preserves embodied energy, and creates less air and water pollution.

The Los Angeles Conservancy commissioned this study to better understand how historic preservation contributes quantitatively and qualitatively, to the city's economic, social, and environmental present and future. **From this report, it is clear that preservation plays a positive role in promoting stable neighborhoods, protecting existing affordable housing, and meeting new housing and creative office needs.** It shows that historic preservation does not impede growth or development; it upholds thoughtful strategies that do not sacrifice the city's invaluable historic resources. As the city looks to its future, viable solutions and opportunities provided by historic preservation should be considered. To view the full study, please visit [laconservancy.org/preservation-positive](http://laconservancy.org/preservation-positive).

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**CONSERVANCY**

**ABOUT THE LOS ANGELES CONSERVANCY**

The Los Angeles Conservancy is a nonprofit membership organization that works through education and advocacy to recognize, preserve, and revitalize the historic architectural and cultural resources of Los Angeles County. What began as a volunteer group in 1978 now has the largest membership of any local preservation organization in the U.S. For more information, please visit [laconservancy.org](http://laconservancy.org).



**ABOUT PLACEECONOMICS**

PlaceEconomics is a private sector firm with over thirty years' experience in the thorough and robust analysis of the economic impacts of historic preservation. They conduct studies, surveys, and workshops in cities and states across the country that are addressing issues of downtown, neighborhood, and commercial district revitalization and the reuse of historic buildings. For more information, please visit [placeeconomics.com](http://placeeconomics.com).

Unless otherwise noted, all photos are credited to Adrian Scott Fine and the Los Angeles Conservancy.



**From:** Ruth Dekker <rsd9194@gmail.com>  
**Sent:** Thursday, February 29, 2024 8:42 PM  
**To:** City Clerk's Office  
**Subject:** Opposition to moratorium on Historic Districts

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

To Whom It May Concern,

I strongly oppose the proposed moratorium on Historic Districts led by Sarah Rambaugh.

Sincerely,  
Ruth S. Dekker  
I live in a historic district at 616 N M St, Tacoma, WA 98403.

**From:** Darin Lenderink <darin@lenderink.org>  
**Sent:** Thursday, February 29, 2024 9:45 PM  
**To:** City Clerk's Office  
**Subject:** "Historic District Moratorium"

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

We learned about the proposed moratorium on local Historic Special Review Districts recently and are concerned it will send a message to citizens and planners that the City does not value the protection of historic districts/properties.

We understand this moratorium is being proposed during the comprehensive planning efforts being carried out by the city. The planning process has been going on for several years. Why would a moratorium be needed now? Shouldn't the city be identifying areas in the community that need protection and including them in the planning documents? Or is it left to property owners /neighborhoods to record and evaluate these potential cultural resources?

Our family moved to Tacoma 30 years ago for its walkable neighborhoods with early 20<sup>th</sup> century homes. We were happy to live in a city where important reinvestments in historic properties were supported. The adaptive reuse of the Tacoma Union Station and adjoining warehouse district for the US Courts and a University of Washington has helped improve Tacoma's poor image in the greater Puget Sound Community.

We hope Tacoma continues to support our healthy and vibrant neighborhoods and look to protect historic structures throughout the city.

Kind Regards,

Darin and Kelly Lenderink  
520 North Cushman Ave

**From:** Victoria Weldon <victoria6655321@yahoo.com>  
**Sent:** Thursday, February 29, 2024 9:57 PM  
**To:** City Clerk's Office  
**Subject:** Opposition to Proposed Moratorium on Historical Districts

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Good evening,

I am writing to express my strong opposition to the proposed moratorium on historical districts within the city of Tacoma. As a resident who deeply values the preservation of our cultural heritage and architectural history, I believe that imposing such a moratorium would be detrimental to the character and identity of our community.

Historical districts play a vital role in maintaining the unique charm and aesthetic appeal of our city. They serve as living reminders of our past, showcasing the evolution of our society and the contributions of those who came before us. Preserving these districts not only honors our heritage but also attracts tourism and boosts local economic activity.

Furthermore, historical preservation fosters a sense of pride and belonging among residents, as they feel connected to their community's roots and traditions. By safeguarding these landmarks, we ensure that future generations can continue to appreciate and learn from our shared history.

I understand the concerns that may have prompted the proposal for a moratorium, such as development pressures and planning positioning for projects such as Home in Tacoma.

And I do believe that these issues can be addressed through thoughtful planning and collaboration between city officials, property owners, and preservation advocates, but I do not believe that this should limit neighborhoods or districts from the ability of preservation to make way for modern structures if they desire to do so.

Instead of imposing a blanket moratorium, I urge the city council to explore alternative solutions that balance the need for development with the imperative to protect our historical assets. This could include providing incentives for historic preservation efforts, or facilitating public-private partnerships to fund restoration projects.

In conclusion, I respectfully request that the city council reconsider the proposed moratorium on historical districts and instead pursue measures that uphold our commitment to preserving our cultural heritage for generations to come. Thank you for considering my perspective on this important issue.

Sincerely,  
Victoria Weldon  
611 N M ST  
Tacoma, WA 98403

**From:** Maria Pascualy <yellowknife@comcast.net>  
**Sent:** Friday, March 1, 2024 8:57 AM  
**To:** City Clerk's Office  
**Subject:** I oppose Sarah Rumbaugh's moratorium

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

I oppose the moratorium on historic districts that Sarah Rumbaugh is proposing to the City Council.

Thank you-

Maria Pascualy  
509 N M st  
Tacoma, WA 98403

**From:** John <jlh396@comcast.net>  
**Sent:** Friday, March 1, 2024 6:52 PM  
**To:** City Clerk's Office  
**Subject:** Council Public Hearing - Proposed Historic District Moratorium

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

This is the craziest idea ever !

I am a former chair of the landmarks commission and owner of several historic listed properties .

Astoundingly ill conceived!

Cheers,

John Hopkins.  
Puyallup.  
253 -973- 7069

**From:** Roger Johnson <rajohnson@wamail.net>  
**Sent:** Saturday, March 2, 2024 10:24 AM  
**To:** City Clerk's Office  
**Subject:** Historic Districts

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I am totally against any moratorium on historic districts in Tacoma!

Roger Johnson citizen of Tacoma

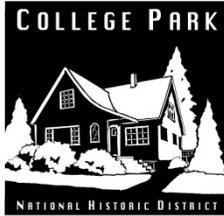
**From:** Jeffrey J. Ryan <jjryan@harbornet.com>  
**Sent:** Saturday, March 2, 2024 11:42 AM  
**To:** McKnight, Reuben; City Clerk's Office  
**Subject:** Historic Moratorium Inquiry  
**Attachments:** City of Tacoma TPC ltr 2024-03-02 - Proposed moritorium on Historic Districts.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please find my letter in opposition to the proposed moritourm on local historic districts. I ask that it be included in the written comments for the city council in review of this resolution.

Thank you for your time.

**Jeffrey J. Ryan, Architect**  
LEED AP, BD+C



March 1, 2024

City of Tacoma, City Clerk's Office  
Mayor & Members of the Tacoma City Council  
747 Market Street.  
Tacoma, WA 98402

Re: Proposed Moratorium on Nominations of Historic Districts to Tacoma Register of Historic Places.

Honorable Mayor & Members of the Commission,

I am writing in opposition to the proposed Moratorium on historic districts within the city of Tacoma. This resolution appears to be more about retaliation for a community group simply asking for a local historic listing, then an act to reduce staff & commission time or as a step in improving the city code. It is unfortunate that in over eight months of discussion and staff time in review of this resolution, no new changes to the code have been publically discussed and no new nominations have been submitted. Would it not have been a better use of time and resource to have discussed improvements to city policy rather than ways to restrict the rights of citizens to improve their community as a grass roots effort, which this resolution appears to represent? Historic districts have over a fifty year record in Tacoma of improving our community, both economically and socially this should not be curtained by a councilmember that does not support cultural & historic preservation efforts.

In review of the subject of moratoriums in Tacoma, the proposed resolution would be an unprecedented act and an unwarranted action that should not be taken lightly by the council. Revisions to the city code are updated on a regular basis and to my knowledge this is the first time that a moratorium has been contemplated, rather than simply proceeding with the steps to updating the current code sections. Historic districts are a valuable part of our city's culture, diversity and sense of community, we need more not less. Historic districts which are formed by the residents, based on a clear set of requirements are an organic approach to community building and urban planning. They are a unique grassroots way by which the people of this city can improve their own community and the city as a whole. Empower the residents to make quality changes don't curtail their efforts.

Historic districts are a unique housing choice that's currently not found in over 99 percent of the city. The current nomination process has been embraced and revised in our city policies for over 50 years, while positive changes to improve the system are always welcome, this resolution does not solve any issues within the current code. One of the leading economic benefits of historic districts are the tax credits allowed by a nomination. Tax credits have refurbished many the of the city's older multifamily structures, including structures for low income and homeless members of our city. As an architect

that has worked on low income housing projects within the city over the last 35 years, many of these housing projects would not have been possible without the tax credit process. A renovation of existing structures has been found to add more to the local economy, local contractors and craftsmen, then new construction. This has been proven by independent scholarly studies time and time again since the National Preservation Act of 1966. There are many positive attributes to local historic districts for a city and yet there has only been one nomination in the last 14 years that has made it to the review process; this in spite of a number of studies by the city of Tacoma for new districts that that have not resulted in any no new districts in the city in the past 20 years. Residential historic districts need the support of the people who live and work in these areas, community support, that is the reason community based nominations have succeeded where city based studies have failed. The College Park nomination has a majority support of the residents and owners who call this place home.

### **In the residential area of our city:**

- The last nomination for a local listing before College Park was in 2010 for the Wedge district a part of the Hill Top neighborhood study area twenty five years ago.
- Only **1%** of the residual land of the city is currently within a Local historic district, allowing for a limited design review by the city's Landmarks Preservation Commission.
- Less than **3%** is within a Local, State or National registered district.
- By comparison **12%** of our residential land is within a View Sensitive Areas created by the city in 1987, with restrictions on building heights and use.
- **Over 25%** of the land within the city is controlled by private restrictive covenants and Home Owners agreements that are not subject to city or state policies on housing or density increases.
- Councilmember Rumbaugh lives on an excessively large parcel of land for Tacoma, over 3 acres, in an area within a VSD and with private building restrictions, not subject to state and Home in Tacoma requirements.

The nomination for College Park, which appears to have been the basis for CM Rumbaugh's moratorium resolution, was reviewed and approved by the Tacoma Landmarks Preservation Commission **Twice**. The commission reviewed the original nomination and a second revised nomination which included 50 pages of additional information request by the Planning Commission during their first review process. While this nomination was approved by the TLPC the nomination was publically reticulated by the Planning Commission before it was even received and rejected without review, based on person bias rather than city policy during its first review process. The resubmittal to address their stated concerns was rejected without any further review or a hearing on the revised nomination. This was by no means a fair review of the nomination of a nationally listed historic district, a district that received an award by the city in 2019 for the completeness of the N.R. nomination and volunteer effort that produced it. The Planning

Commissions review did not follow the current city policy for review; the proposed resolution will not improve this process further.

Based on the review process and the lack of new nominations, there does not appear to be any need for a Moratorium or hold on applications. The resolution appears to be purely a punitive action by CM Rumbaugh who does not support historic preservation in our city based on her own statements. In review of public records, CM Rumbaugh was also speaking with Landlord Solutions, a known lobbyist firm for the investment housing industry during our nominations review process. Rather than supporting a community based application for recognition of the history our neighborhood and the city, an area within her council district, CM Rumbaugh choice to turn her back on her constituents and propose a frivolous resolution. This resolution has wasted both valuable time and effort of the staff and commissions with no positive outcome or change.

I would agree there is a need for corrections and updates to the policies and guidelines used in the nomination process, but ones that don't needlessly restrict nomination but improves the review process for the applicant. It would be helpful to improving the transparency of a review process, limit the review to the requested submittal topics and to improve the timeliness of a review process for all the participants. To assist in streamlining the process and to reduce the workload on City Commissions and staff, the process could be reduce considerably if only the one of the charter commissions reviewed the nomination before a final review for approval by the City Council. The current policy with overlapping review could be considered burdensome on staff and commission time as it is currently approached. In review of the policies for the top 100 cities in the state of Washington, based on population, as well as a few smaller cities that are part of the states certified local government program in historic preservation as administered by the Department of Archeology & Historic Preservation (DAHP); there are currently only four cities, 4% that require the review of a historic nomination by a Planning Commission. The vast majority of the cities in Washington reviews a nomination through their Landmark Board or Commission and based on their recommendations the city council makes the final call. Since Tacoma has Landmarks Commission, a charter commission of equal standing with the Planning Commission, perhaps the best and most timely solution to the review process would be to have the TLPC handled the review process and their by reducing duplication in the review process and saving considerable time and effort by the city. That would be my first recommendation for a positive policy change to reduce costs and time need for a review.

Of the four cities that currently require Planning Commissions review of local historic district nominations prior to final review of the nomination by the City Council; Tacoma is the only one that allows the Planning Commissions to veto a nomination prior to a review by our elected representatives. Tacoma is also the only city that requires any stated level of support by the owner for a review by the city Council if rejected by a commission, let alone on an 80% level of support, based on property values, in 14 days in order to override the Planning Commission veto. An 80% level of support is not a reasonably achievable request that can be achieved in 14 days. The 80% policy was placed in the code to stop nomination from reaching a review by the city council, it

shields their involvement in the review process, and it serves no other purpose. The last review of a VSD revision by contrasts was rejected by the Planning Commission but approved by the city council in 2020. Both historic districts and VSD's are consider land use overlay areas. The only difference in the process for a review of two overlay zones are nomination for historic districts are proposed by the residents and need to demonstrate support by residents and owners, VSD are proposed by the city with no demonstrate support required.

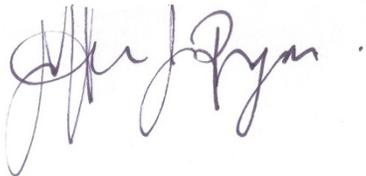
The other three cities with a planning commission review have no restrictions based on owner support prior to a review by their elected councilmembers, regardless of a positive or negative review by the commission. Bellingham in fact waives the review by the Planning Commission entirely if the district is already on the State or National registry of historic places, since these are considered higher levels of honor than a local listing. The City of Lacey current has no Landmarks Board so their Planning commission covers this review process. Mount Vernon has no historic districts currently but a nomination would go on to their council with an up or down recommendation by their planning commission.

Based on the current requirements for the nomination of a district to the local register in Tacoma, there is no need for a review by two city commissions. The Tacoma Landmarks Commission which has been selected by the council to review the issue of preservation and history should be allowed to cover this subject as a charter commission with the expertise in the subject matter. This would reduce the redundancy of the current system and save considerable time by all, which was noted as the reason given by the councilmembers for the resolution before you.

It is my hope; the council will refrain from imposing a moratorium on nominations that support the goals of communities within our city. I look forward to an open public discussion regarding possible changes and improvements to the city's review process, to improve the process for the residents of the city; I ask that you chose not to impose a moratorium as part of this review process.

Thank you for your time and attention to this request.

Sincerely,

A handwritten signature in blue ink that reads "Jeff Ryan". The signature is fluid and cursive, with a small dot at the end.

Jeff Ryan, Architect  
LEED BD+C

College Park Historic District Association.

3017 North 13<sup>th</sup> Street  
Tacoma WA, 98406

253.380.3197 c.  
jjryan@harbornet.com

**From:** Marshall McClintock <marshalm@q.com>  
**Sent:** Saturday, March 2, 2024 2:01 PM  
**To:** City Clerk's Office  
**Subject:** Public hearing - proposed historic district moratorium

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Mayor Woodards and City Council:

I opposed any moratorium of historic and conservation districts in the city of Tacoma.

Such a moratorium is completely needed. As CM Bushnell suggested at the recent Council study session on the issue, is at best simply a scheduling issue. Unlike some other land use requests, both the Landmarks Preservation Commission and the Planning Commission have complete discretion as to if or when they take up a historic district nomination. A moratorium adds nothing.

It is also interesting that the Planning Commission and City Council in 2020-21 rewrote three complex chapters of the Comprehensive Plan, Urban Form, Design & Development, and Housing, without anyone suggesting that a moratorium on land use and permitting requests was needed while those revisions were developed and approved. Yet somehow the revision of the single Historic Preservation chapter of the Comprehensive Plan requires a full stop to consideration of historic and conservation districts.

Such a moratorium threatens possible downtown development activities but also quashes efforts to extend historic preservation efforts to under-served neighborhoods. Moreover, it eliminates the typical national, state, and local response to the discovery of archeological objects or remains, where a historic district is designated to protect the resources and context of the potential area of discovery.

Regards,

Marshall McClintock  
701 North J Street

**From:** curt.stoner@comcast.net  
**Sent:** Saturday, March 2, 2024 2:45 PM  
**To:** City Clerk's Office  
**Subject:** Historic District Moratorium Comment

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear City Clerk,

I oppose Sarah Rumbaugh's moratorium on Historic Districts as proposed to the Tacoma City Council.

Thanks & Regards,

Curt Stoner  
315 N. J Street Apt. 22  
Tacoma, WA 98403

**From:** gknudson@harbornet.com  
**Sent:** Saturday, March 2, 2024 2:48 PM  
**To:** City Clerk's Office  
**Subject:** Historic District Moratorium

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Greetings-

As a ten-year past board member and past president of Historic Tacoma. I am solidly against the proposed moratorium on historic districts. You may count me as a co-signatory to the excellent Historic Tacoma letter of February 27, as well as the informative press release on the same subject, for the purpose of detailing my beliefs and position on this subject. The proposed action flies in the face of over 2 decades of personal experience working with the City to employ the tools available to the HPO to expand the measures available under the Comprehensive Plan, and indeed, mandated under its opening chapter as goals to be pursued under the Plan to broaden the positive effects of the canon of building and land use codes.

There is a general movement toward empowering investor-driven developers and construction-related business interests at the expense of diminished options afforded to owners of small businesses and modest homes, either within or outside of historic districts. The resolution does not address any compensatory measures to a broad moratorium or acknowledgement of any benefits of the long-term benefits of the long-standing collaboration between, Building, Planning and HPO in preserving equity and the quality of life within the City.

Please vote, 'No' on the proposed moratorium.

Gary Knudson

3307 N. 25th St.

Tacoma 98406-6117

**From:** Ross and Julie Buffington <rjbuffington@comcast.net>  
**Sent:** Sunday, March 3, 2024 11:45 AM  
**To:** City Clerk's Office  
**Subject:** Proposed Historic District Moritorium

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To City Council Members:

I am strongly opposed to the proposed local historic district moratorium. This proposed moratorium is unnecessary, ill-conceived, and contrary to the city of Tacoma's commitment to historic properties. I have lived in the city's Wedge Historic Neighborhood since its inception and I can attest that the historic designation of our neighborhood has had a positive impact on our community and the city of Tacoma as a whole. The Landmarks Preservation Commission does not need a moratorium to implement new policy and code recommendation. Tacoma needs to honor its commitment to preserving its historically valuable buildings and neighborhoods.

I also note that public comments regarding this proposed moratorium to both the Landmarks Preservation Commission and the Planning Commission were overwhelmingly opposed to its passage. Furthermore, The Landmarks Preservation Commission voted to oppose this proposed action.

-Ross Buffington  
502 S. Sheridan Ave.  
Tacoma, WA. 98405

(253) 267-1066

**From:** Misty Cooney <mistycooney3@msn.com>  
**Sent:** Sunday, March 3, 2024 2:19 PM  
**To:** City Clerk's Office  
**Subject:** Opposition to moratorium

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I oppose the moratorium on Historic districts that Sarah Rumbaugh is proposing to the City Council.

Thank you  
Misty Cooney  
804 South L St  
Tacoma Wa 98405

**From:** Judy C. <jchinski74@gmail.com>  
**Sent:** Sunday, March 3, 2024 5:58 PM  
**To:** City Clerk's Office  
**Subject:** Moratorium on historic districts

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I oppose the moratorium on historic districts that Sarah Rumbaugh is proposing to City Council.

Sincerely,  
Judy Chichinski  
625 N M St.  
Tacoma, WA 98403

**From:** Scott Larsen <scott@great-promotions.com>  
**Sent:** Monday, March 4, 2024 10:58 AM  
**To:** City Clerk's Office  
**Subject:** comment on proposed moratorium on historic districts

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

A moratorium on new historic districts for Tacoma sounds like a bad idea which should be rejected. Who benefits from such a moratorium? History gives a community its unique look and character, sets it apart. It seems like a closed minded approach to say no more historic districts are worth considering. I don't know what "problem" a moratorium is expected to solve but surely a better solution than closing off the option of even considering new districts should be possible.

***Scott Larsen***

**From:** Peter Bennett <peter@peterbennett.org>  
**Sent:** Monday, March 4, 2024 11:10 AM  
**To:** City Clerk's Office; <board@nenc.org>; Exec Committee; Pauli, Elizabeth; Myers, Rosheida; Bacha, Chris (Legal)  
**Subject:** NENC comments on Moratorium on Historic Districts  
**Attachments:** NENC Comments on Moratorium on Historic Districts.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Mayor & City Council Members  
NENC Board Members  
Community Council of Tacoma  
Elizabeth Pauli, City Manager  
Chris Bacha, City Attorney

Please find attached comments from the North End Neighborhood Council (NENC) on this issue.



North End Neighborhood Council

2522 N Proctor St, Box 418

Tacoma, WA 98406-5338

[www.NENC.org](http://www.NENC.org)

[www.facebook.com/NENCTacoma](https://www.facebook.com/NENCTacoma)

[www.twitter.com/NENCTacoma](https://www.twitter.com/NENCTacoma)

[info@nenc.org](mailto:info@nenc.org)

March 2, 2024

Tacoma City Council  
747 Market St.,  
Room 345  
Tacoma, WA 98402

Dear City Council Members:

The North End Neighborhood Council (NENC) wishes to register our opposition to the proposed moratorium on historic districts and respectfully asks that the Council reject this proposal.

With our Neighborhood District including all, or parts of, several Historic Districts we are aware of the benefits such designations provide. These include, but are not limited to, community involvement and pride which are values that the City Council desires to encourage and not discourage.

We have seen the comments provided by Historic Tacoma and fully endorse and support that letter and the issues that it addresses.

Sincerely

*Peter D. Bennett*

Peter Bennett  
NENC Board Chair

CC: NENC Board Members  
Mayor & City Council Members  
Community Council of Tacoma  
Elizabeth Pauli, City Manager  
Chris Bacha, City Attorney

**From:** Chris Moore <Chris@preservewa.org>  
**Sent:** Monday, March 4, 2024 12:08 PM  
**To:** City Clerk's Office  
**Subject:** Public Comments - Local Historic District Moratorium  
**Attachments:** WTHP ltr - Tacoma City Council\_Resolution 41226 - 3.4.24.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear City Clerk,

Please find attached comments from the Washington Trust for Historic Preservation regarding the proposed moratorium on the nomination of local historic districts the Tacoma Register of Historic Places (Resolution No. 41226) being discussed at the upcoming Public Meeting being held on Tuesday, March 5. Please include these comments as part of the public record for the public meeting.

Thank you for the opportunity to comment.

Best,  
Chris

**Chris Moore** | Executive Director  
*he / him / his*

Washington Trust for Historic Preservation  
1204 Minor Avenue | Seattle, WA 98101  
206-624-9449 (o) | 206-930-5067 (c)

[preservewa.org](http://preservewa.org)



March 4, 2024

Tacoma City Council  
cityclerk@cityoftacoma.org  
747 Market Street Street  
Tacoma WA, 98402

[sent via electronic mail]

Re: Local Historic District Moratorium - Resolution No. 41226

Dear Mayor Woods and Members of the Council:

I am respectfully submitting these comments on Resolution No. 41226 for consideration at the Council's scheduled Public Hearing Tuesday, March 4<sup>th</sup>. The Washington Trust is a nonprofit organization dedicated to saving the places that matter in Washington State and to promoting sustainable and economically viable communities through historic preservation. We are Washington's only statewide nonprofit advocacy organization working to build a collective ethic that preserves historic places through education, collaboration, and stewardship.

Council Resolution No. 41226 directed the Landmarks Preservation Commission (LPC) and the Planning Commission (PC) to conduct a public process for the purpose of recommending whether a moratorium on the nomination of local historic districts is warranted. While the LPC – the city commission with expertise in historic preservation – opposed the proposed moratorium, the PC voted 6-1 in favor of a temporary moratorium at its meeting held November 15, 2023. The Washington Trust opposes such the PC's recommendation to establish a temporary moratorium for the following reasons:

- A moratorium is unnecessary. There are only four Historic Districts across the city listed in the Tacoma Register. The last to be listed – the Wedge Neighborhood Historic District – occurred in 2011. Since that time, only one additional local historic district has been nominated to the Tacoma Register – the proposed College Park Historic District. This nomination was ultimately denied by the Planning Commission in November 2022.
- The Resolution cites concerns over volunteer and staff time required to review local district nominations. Yet this is one of the primary functions of the LPC: to review nominations of eligible historic resources for consideration as individual landmarks or as part of a district. That only four local districts have been established points to the fact that district review is a relatively uncommon occurrence. And while the College Park Historic District nomination has been re-submitted for review, the amount of volunteer and staff time required to undertake this review should be significantly less given the short amount of time that has lapsed since the original review of this nomination.
- Review of the City's historic designation process is already slated to occur as part of the 2024 Comprehensive Plan update process. The public process the LPC and the PC would be required

to undertake simply to recommend whether or not a moratorium is needed could well extend in to 2024. As such, it seems inefficient (as well as an intense use of volunteer and staff time) to consider what may be a short-lived moratorium given review of the process proposed as part of the Comprehensive Plan update. Furthermore, the likelihood of an additional district nomination being submitted prior the 2024 Comprehensive Plan update seems unlikely, given the relative few numbers of local historic districts (the pending re-review of the College Park Historic District notwithstanding).

- The moratorium is inconsistent with several goals of the city's Comprehensive Plan included in the Design & Development Chapter, the Economic Development Chapter and, most notably, the chapter on Historic Preservation.
- Typically, the adoption of moratoria are reserved for land use practices that are allowed by right. Historic Districts, however, are not allowed by right – they are subject to approval by the City Council and therefore are discretionary. Moreover, the council does not have a time frame by which it must put forth a decision on a proposed historic district. For all intents and purposes, the council already has the ability to place a moratorium on the creation of new historic districts by simply opting to table any decision.
- Historic structures, buildings and districts add to the unique sense of place Tacoma offers to visitors and residents, while also serving as an important source for local economic development. The City of Tacoma has been supportive of historic preservation for both of these reasons, and many others. Establishing a moratorium, we fear, would be perceived by the public as the City losing faith in the value – both culturally and economically – of Tacoma's historic built environment.

Overall, we share concerns of both the LPC and PC regarding issues of equity and the historic designation process. A review of the process, including criteria, eligibility, and the pathway to designation, should all be considered with an equity lens in alignment with the city's overall values and goals. But as so few district nominations are actually submitted, we simply do not think a moratorium is required given the staff time involved to consider such a question and the fact that review of the designation process is already set to occur in 2024. We appreciate the opportunity to comment and look forward to continued conversations about this important issue.

Sincerely,



Chris Moore  
Executive Director

**From:** Meredith, Linnea  
**Sent:** Monday, March 4, 2024 2:02 PM  
**To:** Baker, D'Angelo  
**Cc:** Huffman, Peter; Boudet, Brian; Atkinson, Stephen; Moeinian, Maryam; City Clerk's Office; Pike, Aubrey; Kingsolver, Kurtis  
**Subject:** RE: City Council Presentation: Final Reading Reading - STGPD Moratorium Extension Ordinance - February 27, 2024

**Importance:** High

Hi D'Angelo,

For the presentation for final reading of Ordinance No. 28958 at Council tomorrow, can you please send the presenter's link to the list below? They will be available for questions only.

Kelsie Lane: [klane@tpchd.org](mailto:klane@tpchd.org)

Esther Beaumeir: [ebeaumier@tpchd.org](mailto:ebeaumier@tpchd.org)

Scott Hallenberg: [shallenb@cityoftacoma.org](mailto:shallenb@cityoftacoma.org)

Glen George: [ggeorge1@cityoftacoma.org](mailto:ggeorge1@cityoftacoma.org)

Thank you!

Linnea Meredith (she/her)

Planning & Development Services Office Manager

City of Tacoma: 747 Market Street, Room 408, Tacoma WA 98402

Desk: 253-591-5553 | Cell: 253-331-3386 | Fax: 253-591-5097

[lmeredith@cityoftacoma.org](mailto:lmeredith@cityoftacoma.org)

***PUBLIC RECORDS DISCLOSURE:** This email is a public record of the City of Tacoma and is subject to public disclosure unless lawfully exempt.*

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**From:** Baker, D'Angelo <[DBaker@cityoftacoma.org](mailto:DBaker@cityoftacoma.org)>

**Sent:** Friday, March 1, 2024 2:19 PM

**To:** Meredith, Linnea <[lmeredith@cityoftacoma.org](mailto:lmeredith@cityoftacoma.org)>; Kingsolver, Kurtis <[KKINGSOL@cityoftacoma.org](mailto:KKINGSOL@cityoftacoma.org)>

**Cc:** Huffman, Peter <[PHUFFMAN@cityoftacoma.org](mailto:PHUFFMAN@cityoftacoma.org)>; Boudet, Brian <[BBoudet@cityoftacoma.org](mailto:BBoudet@cityoftacoma.org)>; Atkinson, Stephen <[satkinson@cityoftacoma.org](mailto:satkinson@cityoftacoma.org)>; Moeinian, Maryam <[MMoeinian@cityoftacoma.org](mailto:MMoeinian@cityoftacoma.org)>; City Clerk's Office <[cityclerk@cityoftacoma.org](mailto:cityclerk@cityoftacoma.org)>; Pike, Aubrey <[apike@cityoftacoma.org](mailto:apike@cityoftacoma.org)>

**Subject:** RE: City Council Presentation: First Reading - STGPD Moratorium Extension Ordinance - February 27, 2024

Understood. Thanks!

**D'Angelo Baker**

*He/Him*

**Management Fellow**

City Manager's Office

City of Tacoma, 747 Market Street, Room 1200

Tacoma, WA 98402 | (253) 242-0512

[dbaker@cityoftacoma.org](mailto:dbaker@cityoftacoma.org) | [www.cityoftacoma.org](http://www.cityoftacoma.org)

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**From:** Meredith, Linnea <[lmeredith@cityoftacoma.org](mailto:lmeredith@cityoftacoma.org)>

**Sent:** Friday, March 1, 2024 7:55 AM

**To:** Baker, D'Angelo <[DBaker@cityoftacoma.org](mailto:DBaker@cityoftacoma.org)>; Kingsolver, Kurtis <[KKINGSOL@cityoftacoma.org](mailto:KKINGSOL@cityoftacoma.org)>

**Cc:** Huffman, Peter <[PHUFFMAN@cityoftacoma.org](mailto:PHUFFMAN@cityoftacoma.org)>; Boudet, Brian <[BBoudet@cityoftacoma.org](mailto:BBoudet@cityoftacoma.org)>; Atkinson, Stephen <[satkinson@cityoftacoma.org](mailto:satkinson@cityoftacoma.org)>; Moeinian, Maryam <[MMoeinian@cityoftacoma.org](mailto:MMoeinian@cityoftacoma.org)>; City Clerk's Office

<[cityclerk@cityoftacoma.org](mailto:cityclerk@cityoftacoma.org)>; Pike, Aubrey <[apike@cityoftacoma.org](mailto:apike@cityoftacoma.org)>

**Subject:** RE: City Council Presentation: First Reading - STGPD Moratorium Extension Ordinance - February 27, 2024

**Importance:** High

Good morning D'Angelo,

Attached is a PowerPoint presentation for final reading of Ordinance No. 28958 at Council next week. We don't normally do a presentation for final reading, however the Mayor requested Maryam review the presentation next week since only a portion of the presentation was show on the screen during first reading.

Please let me know if you have any questions.

Thank you!

Linnea Meredith (she/her)  
Planning & Development Services Office Manager  
City of Tacoma: 747 Market Street, Room 408, Tacoma WA 98402  
Desk: 253-591-5553 | Cell: 253-331-3386 | Fax: 253-591-5097  
[lmeredith@cityoftacoma.org](mailto:lmeredith@cityoftacoma.org)

***PUBLIC RECORDS DISCLOSURE:** This email is a public record of the City of Tacoma and is subject to public disclosure unless lawfully exempt.*

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**From:** Meredith, Linnea

**Sent:** Friday, February 23, 2024 8:58 AM

**To:** Baker, D'Angelo <[DBaker@cityoftacoma.org](mailto:DBaker@cityoftacoma.org)>; Kingsolver, Kurtis <[KKINGSOL@cityoftacoma.org](mailto:KKINGSOL@cityoftacoma.org)>

**Cc:** Huffman, Peter <[PHUFFMAN@cityoftacoma.org](mailto:PHUFFMAN@cityoftacoma.org)>; Boudet, Brian <[BBoudet@cityoftacoma.org](mailto:BBoudet@cityoftacoma.org)>; Atkinson, Stephen <[satkinson@cityoftacoma.org](mailto:satkinson@cityoftacoma.org)>; Moeinian, Maryam <[MMoeinian@cityoftacoma.org](mailto:MMoeinian@cityoftacoma.org)>; City Clerk's Office <[cityclerk@cityoftacoma.org](mailto:cityclerk@cityoftacoma.org)>; Pike, Aubrey <[apike@cityoftacoma.org](mailto:apike@cityoftacoma.org)>

**Subject:** City Council Presentation: First Reading - STGPD Moratorium Extension Ordinance - February 27, 2024

Good morning D'Angelo and Kurtis,

Attached is the PowerPoint presentation for first reading of Ordinance No. 28958 (STGPD Moratorium Extension) at the City Council meeting next week.

**Planning and Development Services Senior Planner Maryam Moeinian will be presenting in-person.**

-  
The individuals below will be attending the City Council meeting virtually and will be available for questions only. Can you please send them the presenters link?

-  
Kelsie Lane: [klane@tpchd.org](mailto:klane@tpchd.org)  
Esther Beaumeir: [ebeaumier@tpchd.org](mailto:ebeaumier@tpchd.org)  
Scott Hallenberg: [shallenb@cityoftacoma.org](mailto:shallenb@cityoftacoma.org)  
Glen George: [ggeorge1@cityoftacoma.org](mailto:ggeorge1@cityoftacoma.org)

Please let me know if you have any questions.

Thank you!

Linnea Meredith (she/her)  
Planning & Development Services Office Manager  
City of Tacoma: 747 Market Street, Room 408, Tacoma WA 98402  
Desk: 253-591-5553 | Cell: 253-331-3386 | Fax: 253-591-5097  
[lmeredith@cityoftacoma.org](mailto:lmeredith@cityoftacoma.org)

**PUBLIC RECORDS DISCLOSURE:** *This email is a public record of the City of Tacoma and is subject to public disclosure unless lawfully exempt.*

**From:** Yahoo Mail <apclark66@yahoo.com>  
**Sent:** Monday, March 4, 2024 2:26 PM  
**To:** City Clerk's Office  
**Subject:** HISTORIC DISTRICT MORATORIUM

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I oppose a moratorium on the Historical Districts of Tacoma

[Sent from Yahoo Mail for iPhone](#)

**From:** Deborah Cade <dlcade@comcast.net>  
**Sent:** Monday, March 4, 2024 3:26 PM  
**To:** City Clerk's Office  
**Subject:** Comments to City Council re Historic District Moratorium  
**Attachments:** NSHD\_Comments\_moratorium\_03042024.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please accept the attached comment letter regarding the proposed historic district moratorium and forward to city councilmembers. Thank you.

Deborah Cade



# North Slope Historic District

a 501 (c)(3) organization

**908 North M St.  
Tacoma WA 98403**

March 4, 2024

Tacoma City Council  
747 Market St., Room 345  
Tacoma, WA 98402

RE: Proposed Historic District Moratorium

Dear Mayor Woodards and City Council:

The North Slope Historic District, Inc. board opposes the proposed moratorium on historic districts and respectfully asks that the Council reject this proposal. We have seen the comments provided by Historic Tacoma and fully endorse and support that letter and the issues that it addresses.

We see no need for a moratorium on new local historic districts while the Historic Preservation chapter of the Comprehensive Plan is reviewed and updated in 2024. Home in Tacoma is the most massive change to the City's land use regulations since there have been such regulations. The Planning Department, the Planning Commission, and City Council were able to develop and make those changes to three major Comprehensive Plan chapters in 2021 and no one suggested the need for a moratorium on land use changes while that work was being done. Similarly, the Planning Commission and City Council have been working on Home in Tacoma Phase II, the most massive change to the City's land use regulation since the 1950s, and that work has proceeded without any suggestion that a moratorium is needed. Updating the Historic Preservation chapter of the Comprehensive Plan is minor by comparison.

The Landmarks Preservation Commission and the Planning Commission have complete discretion as to if or when to take a historic district nomination. No moratorium is needed. It is proposed solely to punish by regulatory fiat the residents of the College Park neighborhood who simply addressed comments they received on their historic district nomination and resubmitted it. Please reject the proposed moratorium.

Sincerely,

/s/

Deborah Cade

Chair, North Slope Historic District Board of Directors

**BOARD OF DIRECTORS**  
DEBORAH CADE, CHAIR  
HIST. PRESERVATION  
JULIE TURNER, SECRETARY  
GEOFF CORSO, TREASURER  
JUDITH MARTIN, PROGRAMS  
TOM GISKE, BEAUTIFICATION  
JOHN BUTLER, OUTREACH  
MARSHALL MCCLINTOCK  
LYNDA BEST  
ROGER JOHNSON  
MELINDA GORDON  
ALEX STRAUB

**From:** Heidi S. <heidigs@hotmail.com>  
**Sent:** Monday, March 4, 2024 4:24 PM  
**To:** City Clerk's Office  
**Cc:** Woodards, Victoria; Hines, John; Rumbaugh, Sarah; Scott, Jamika; Ushka, Catherine; Bushnell, Joe; Daniels, Kiara; Diaz, Olgy; Walker, Kristina  
**Subject:** Public Comments re: STGPD Moratorium Extension

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**RE: Public Comments for Second Reading of ORD 28958  
South Tacoma Groundwater Protection District Moratorium Extension  
City Council Meeting of March 5, 2024**

Mayor and City Council,

Please support the extension of the STGPD Moratorium, at the very least "as is"...  
... and at best to include impervious surface limitations, for which this city (unlike others) still has none.

This is not a "new request" but had been the public's original purpose when bringing the moratorium forward last year, along with other stronger protections which your final version did not include.

So, thank you CM Rumbaugh for asking for pervious versus impervious mapping, and noting the unclear plotting of green space. As mentioned in last week's oral comments, the "green spaces" on the city's presentation maps were largely including private land and municipal areas (such as unprotected private property, cemeteries and the landfill) which are incompatible for public "recreation" or proper groundwater infiltration... and appropriate hydrologic assessments have still not yet been done for this geohydrologically environmentally sensitive area.

So, it was again concerning to hear, at last week's Study Session, that "science based" consideration is only referred to for stormwater run-off, when it also needs to apply to infiltration/recharge.

CM Bushnell, please stop continually referring to the 180-mile outlying aquifer zone, and focus on what we do have control over within our city limits which is also where the highest recharge area is yet has been continually allowed to be paved, polluted and damaged within Tacoma instead of protected.

Approximately 40% of South Tacoma (one-fifth of the city) will be significantly affected by Home in Tacoma 2, yet proper protections still aren't in place for the increased development and loss of open land.

The Chamber of Commerce vaguely referring to "industrial recycling" is misleading... this moratorium is addressing extremely damaging metal recycling/auto-crushing which does have significant contamination dangers and should never have been allowed to operate within such an environmentally sensitive area...

... and, no, the city is NOT in compliance while systemically leaving critical aquifer recharge out of decades of critical area reviews, so please extend the moratorium without amending to remove any items.

Thank you,  
Heidi Stephens

PS ~ If any new discussion or amending occurs at the second reading, public comment must be reopened just prior to a final vote.

I'm resubmitting my comments from last week, again asking for a response to the question at the bottom. Thank you.

---

**From:** Heidi S. <heidigs@hotmail.com>  
**Sent:** Monday, February 19, 2024 4:16 PM  
**To:** cityclerk@cityoftacoma.org <cityclerk@cityoftacoma.org>  
**Subject:** Public Comments re: STGPD Moratorium Extension

**February 20, 2024 Public Hearing**

## Re: South Tacoma Groundwater Protection District Moratorium Extension

I support the extension (for as long as the STGPD code is outdated); however, this Council did not include, in the initial limited moratorium, the main reasons which residents had first called for it; so the limited moratorium didn't go far enough and is still needing consideration of:

- Impervious surface limitations for industry/commercial but also for residential zoning and construction, including
- Tree canopy preservation and open green space minimums,
- Prohibiting any "exceptions" to the code, as is currently allowed and is being misused, and preferably a
- Moratorium on all development (private, commercial, city, industrial, residential) until the STGPD code has been appropriately updated.

... because:

- The STGPD overlay supersedes zoning, but somehow the city has allowed PDS to somehow get that flipped,
- Residential construction is now just as "high impact" as commercial / industrial, due to many multi-unit constructions,
- The STGPD code update requires expert scientists, not the same city departments which have neglected and gotten us to this point,
- There's not adequate action/consequences for violations,
- The Green River will not be a lasting source of water (see articles, below); regardless of possibly more rain, the climate change is eliminating snowpack/river run-off, but will instead cause lower elevation stormwater flooding while not properly allowing best infiltration to recharge our vitally important aquifer.

Some information noticeably absent from last week's PDS Study Session presentation:

- PDS has not correctly been conducting critical area permitting, completely omitting critical aquifer recharge in their reviews (the STGPD code is not a substitute for this) despite acknowledging in the 2/13/24 Study Session and in previous meetings confirming this is a critical area and that "critical aquifer recharge" is a category, yet PDS does not conduct required analysis of critical aquifer recharge in their Critical Area Permit reports (another example of City words opposite of City actions) and allowing for potential devastating and irreversible damage.
- Environmental Services addresses stormwater runoff, but that is different than groundwater aquifer infiltration,
- TPU-Water has discovered contaminant PFAS and needs to improve testing and well protection,
- TPCHD only does cursory monitoring of limited businesses,
- Nearly none of the public input was included in the original moratorium and needs to be.

Applicable Articles:

### **When More Rain Means Less Water**

**In the Pacific Northwest, snowpack recharges our drinking water and powers our lives. Now winter precipitation is increasingly falling as rain.**

[https://replica.seattletimes.com/popovers/dynamic\\_article\\_popover.aspx?artguid=e32a83ab-a76f-4eee-b0df-92f13cf5876c&appcode=SEATTL&equid=d1fd3cd1-27a8-4b4d-964b-0180c315635c&pnum=4&fbclid=IwAR1sZNFN4XdEfoQW-uO7EtOmueRsJPZnCTneFazmq5MuGvF4w\\_K2ultX1Q8#](https://replica.seattletimes.com/popovers/dynamic_article_popover.aspx?artguid=e32a83ab-a76f-4eee-b0df-92f13cf5876c&appcode=SEATTL&equid=d1fd3cd1-27a8-4b4d-964b-0180c315635c&pnum=4&fbclid=IwAR1sZNFN4XdEfoQW-uO7EtOmueRsJPZnCTneFazmq5MuGvF4w_K2ultX1Q8#)

### **Washington state drinking water, hydropower at risk as Pacific Northwest snowpack shrinks**

[https://www.columbian.com/news/2024/feb/12/washington-state-drinking-water-hydropower-at-risk-as-pacific-northwest-snowpack-shrinks/?fbclid=IwAR0Zw6RR43cp4HfkayvcOzpbXGkMluifaROkaSMaSeVT6n\\_DVChEqPcoGns](https://www.columbian.com/news/2024/feb/12/washington-state-drinking-water-hydropower-at-risk-as-pacific-northwest-snowpack-shrinks/?fbclid=IwAR0Zw6RR43cp4HfkayvcOzpbXGkMluifaROkaSMaSeVT6n_DVChEqPcoGns)

### **WA's mountain snow recharges our drinking water, powers our lives. Now it's turning to rain.**

[https://www.seattletimes.com/seattle-news/environment/wa-drinking-water-hydropower-at-risk-as-pnw-snowpack-shrinks/?utm\\_source=facebook&utm\\_medium=social&utm\\_campaign=article\\_inset\\_1.1&fbclid=IwAR0CrEggAercu89yvZwislCfqwYM2t5eja\\_SWVH7HtQ6FH8RcEBDEFuKJEc](https://www.seattletimes.com/seattle-news/environment/wa-drinking-water-hydropower-at-risk-as-pnw-snowpack-shrinks/?utm_source=facebook&utm_medium=social&utm_campaign=article_inset_1.1&fbclid=IwAR0CrEggAercu89yvZwislCfqwYM2t5eja_SWVH7HtQ6FH8RcEBDEFuKJEc)

### **WA Dept. of Ecology: July drought declaration still in effect (into 2024)**

[https://ecology.wa.gov/blog/february-2024/washington-s-july-drought-declaration-still-in-effect/?fbclid=IwAR0bAG-onvHkml5s603FwkXXxUIQI9vT3FvtLK00KKkqV\\_YpGIF8-Rnets](https://ecology.wa.gov/blog/february-2024/washington-s-july-drought-declaration-still-in-effect/?fbclid=IwAR0bAG-onvHkml5s603FwkXXxUIQI9vT3FvtLK00KKkqV_YpGIF8-Rnets)

Related questions/comments to the City Council following the 2/13/24 Study Session discussion of the above issue:

CM Bushnell referred to possible other moratoriums... what additional moratoriums?  
(The point of this moratorium is to pause for environmental protection, not to create "immediate clarity" for businesses.)

Glen George, TPU-Water mentioned the IRP final in the fall for public to see, and of an Advisory Committee... who will be invited to / involved in that committee?

Possible South Tacoma Health Impact Assessment: mentioned of a MOU for pilot program into long-range planning... but when will this actually result in a completed HIA for South Tacoma?

Still no outside expert or other agency input yet for the STGPD code update?

After decades of South Tacoma being ignored and/or overburdened, are residents in other areas of the City really asking why attention is (finally) focusing a bit on South Tacoma? As of yet, nearly none of the previous Strategic Planning (for South Tacoma over the decades) has ever fully been followed-through/implemented, so real action is now needed, not more never-to-be-applied consultant studies which are used to only make it look like South Tacoma was given attention. We urgently expert data to determine swift improvements as soon as possible.

Thank you,  
Heidi Stephens

**From:** Judy B <judyann.bey@gmail.com>  
**Sent:** Monday, March 4, 2024 6:35 PM  
**To:** City Clerk's Office  
**Subject:** Historic district moratorium

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Kimmy

City Council Members,

I oppose the moratorium on historical districts. Historical districts enhance the character of the city, among other benefits. A moratorium on a qualified application harms the neighborhood.

Tacoma resident,  
Judy Beylerian

**From:** Esther Day <Dayesther214@outlook.com>  
**Sent:** Monday, March 4, 2024 7:48 PM  
**To:** Woodards, Victoria; Ushka, Catherine; Hines, John; Bushnell, Joe; Diaz, Olgy; Walker, Kristina; Rumbaugh, Sarah; Scott, Jamika; Daniels, Kiara; City Clerk's Office  
**Subject:** Please Do Not Pass This Moratorium on Historic District work  
**Attachments:** Dear Mayor Woodards.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Kimmy

Dear Tacoma City Council and City Clerk,  
Please read my letter requesting that you not pass this Moratorium. For years the City has been talking about inequity that many people suffer. This is an affront to areas that are predominantly black or mixed races.

Do what you say you have wanted to talk about. Don't pass this moratorium.

Respectfully,  
Esther Day

Dear Mayor Woodards, Catherine Ushka, Joe Bushnell, Sarah Rumbaugh, John Hines, Kiera Daniels, Jamika Scott, Olgly Diaz, Kristina Walker, and City Clerk

I write to you today to ask that you stop the one year Moratorium on Historic Preservation District work. We need to make sure that this important work is strongly supported. It is especially so, because of the areas that are impacted unnecessarily by developers who are destroying the ability for people to build wealth for their future and that of their children. These areas are precious to the people who live there.

As the owner of a home that was built almost 100 years ago, I can tell you, that I appreciate it so much. Especially the wood used to construct it that is old and strong.

But I will caution you to be ware of anyone who asks for the ability to halt precious work for their benefit. If anyone of you are developers you must recuse yourself. That person that sits on the council that I have been told may be a developer, should be ashamed to do this – especially if they feel that their own community does not need development and as a member of the council can push back on those thoughts.

Folks, development for the sake of development is not good. Development because it is truly needed, is important. But think about building homes for homeownership. You saw the last report from a developer that Victoria signed the paperwork during council. She was shocked at the cost for a studio and then the cost of a one bedroom. That is NOT AFFORDABLE. None of the housing you are building is affordable.

But don't let developers decide to destroy historic areas that are currently housing mostly minority and black communities that helped to build Tacoma.

I apologize for going off on a tangent, but I saw what happened in Houston, Tx. when many of the historic old homes that were housing blacks and other minorities were unduly destroyed by greedy developers.

Exploring sites for Historic Preservation is not easy work. But try and remember the history of this City. Don't let it get destroyed. Historic sites provide our young with sites they can explore and see what WAS and could BE AGAIN.

Respectfully,  
Esther Day

**From:** Esther Day <Dayesther214@outlook.com>  
**Sent:** Tuesday, March 5, 2024 12:05 PM  
**To:** City Clerk's Office  
**Subject:** RE: Please Do Not Pass This Moratorium on Historic District work

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

No problem. I had not edited the letter but it has my request to stop the Moratorium. Thank you for responding.

---

**From:** City Clerk's Office <cityclerk@cityoftacoma.org>  
**Sent:** Tuesday, March 5, 2024 11:02 AM  
**To:** Esther Day <Dayesther214@outlook.com>  
**Subject:** Re: Please Do Not Pass This Moratorium on Historic District work

Hello Esther,

We have received your comment and the recall message. Your letter has been received by everyone, we apologize that it cannot be recalled now. This will be posted in the comments.

Please let us know if you have any questions, have a wonderful day.

Hollyann Piotrowski

City of Tacoma | City Clerk's Office  
253-591-5505 | [cityclerk@cityoftacoma.org](mailto:cityclerk@cityoftacoma.org)

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**From:** Esther Day <[Dayesther214@outlook.com](mailto:Dayesther214@outlook.com)>  
**Sent:** Monday, March 4, 2024 8:17 PM  
**To:** Woodards, Victoria <[vwoodards@cityoftacoma.org](mailto:vwoodards@cityoftacoma.org)>; Ushka, Catherine <[cushka@cityoftacoma.org](mailto:cushka@cityoftacoma.org)>; Hines, John <[JHines1@cityoftacoma.org](mailto:JHines1@cityoftacoma.org)>; Bushnell, Joe <[JBushnell2@cityoftacoma.org](mailto:JBushnell2@cityoftacoma.org)>; Diaz, Olgy <[ODiaz@cityoftacoma.org](mailto:ODiaz@cityoftacoma.org)>; Walker, Kristina <[KWalker@cityoftacoma.org](mailto:KWalker@cityoftacoma.org)>; Rumbaugh, Sarah <[SRumbaugh@cityoftacoma.org](mailto:SRumbaugh@cityoftacoma.org)>; Scott, Jamika <[JScott8@cityoftacoma.org](mailto:JScott8@cityoftacoma.org)>; Daniels, Kiara <[KDaniels@cityoftacoma.org](mailto:KDaniels@cityoftacoma.org)>; City Clerk's Office <[cityclerk@cityoftacoma.org](mailto:cityclerk@cityoftacoma.org)>  
**Subject:** Recall: Please Do Not Pass This Moratorium on Historic District work

Esther Day would like to recall the message, "Please Do Not Pass This Moratorium on Historic District work".

**From:** Marie Dudley <mdudley.kidwell@gmail.com>  
**Sent:** Wednesday, March 6, 2024 8:09 AM  
**To:** City Clerk's Office  
**Subject:** Historic District Moratorium

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good morning. I oppose the moratorium on Historic Districts that Sarah Rumbaugh is proposing to the city Council. I appreciate it if my opposition is voiced and documented.

Thank you! Marie Dudley (Kidwell)

520 North L St  
Tacoma WA 98403

253 224 2176

**From:** Scott E <scottekidwell@gmail.com>  
**Sent:** Wednesday, March 6, 2024 8:06 AM  
**To:** City Clerk's Office  
**Subject:** Historic District

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

Good morning. I oppose the moratorium on Historic Districts that Sarah Rumbaugh is proposing to the city Council. I appreciate it if my opposition is voiced and documented.

Thank you! Scott Kidwell

520 North L St  
Tacoma WA 98403

**From:** Jess Guatney <hello@jessguatney.com>  
**Sent:** Tuesday, March 5, 2024 4:32 PM  
**To:** City Clerk's Office  
**Subject:** Mortatorium

**Follow Up Flag:** Flag for follow up

**Flag Status:** Flagged

I oppose the moratorium on Historic Districts that Sarah Rumbaugh is proposing to City Council.

Please vote NO on this moratorium.

Jess Guatney  
District 2 Resident  
314 N Yakima Ave, Tacoma, WA 98403