



North Slope Historic District

a 501 (c)(3) organization

908 North M St.
Tacoma WA 98403

April 6, 2021

City of Tacoma Planning Commission
747 Market Ave.
Tacoma, WA

RE: "Home in Tacoma" Proposals

Dear Commissioners:

The North Slope Historic District Board of Directors submits these comments regarding the Home in Tacoma proposals. These comments are those of the NSHD board members; we do not purport to speak for the entire neighborhood. While the neighborhood recognizes the value of historic preservation, people here undoubtedly have a variety of viewpoints on this proposal, and we have encouraged neighbors to submit their own comments.

Development of the North Slope neighborhood predates any zoning requirements, and the neighborhood includes a mix of single-family homes, duplexes, triplexes, fourplexes, and larger multifamily buildings. It is currently zoned HRM-SRD, which recognizes its status as a city historic district to which historic guidelines apply for new construction and exterior work on houses and apartment buildings. The historic district began to be established in 1993, largely in response to a significant effort by developers to buy historic homes and apartment buildings, demolish them, and build larger, more expensive, lower quality buildings. The district was expanded over the following several years. The current mix of single-family and various sizes of multifamily works well and gives the neighborhood its historic urban character. We think that our neighborhood, along with the Stadium District that has a similar housing mix, serves as a good model for how other neighborhoods can incorporate various levels of multi-family housing into traditionally single-family neighborhoods.

Our comments focus on these concerns: (1) demolition of older, typically more affordable homes and apartment buildings needs to be avoided, regardless of whether they are in historic districts; (2) this plan does little if anything to address housing needs of those who cannot afford even the few "affordable" units that might be built, and appears to benefit only developers; (3) choices of areas in which new development is focused should be made by the City and not

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cherry-picked by developers; (4) design review and design standards are critical to the success of this program, and are critical to our support, and remain completely undefined; and (5) there has not been sufficient public involvement or environmental review to inform residents and homeowners of the changes that the City is proposing.

1. Avoid Demolition

Our historic designation currently protects landmarked and contributing structures from demolition without review by the Landmarks Preservation Commission. However, structures outside of historic districts or that are not individually landmarked will not have that protection. Tacoma has beautiful older neighborhoods throughout the city with a mix of housing choices and little to no vacant space for infill development, that could be at risk from developers demolishing and building larger, more expensive structures. We need to learn from, and not emulate, the bad decisions that Seattle has made regarding allowing developers to acquire older buildings, including multi-family buildings, demolish them, and build something that destroys historic buildings, is out of scale with the neighborhood, and that removes more affordable housing and replaces it with less affordable housing.

There needs to be significant restrictions on demolition, rather than any encouragement. To counter demolition, the City should develop an inventory of buildings that should be protected as well as those appropriate for redevelopment in all proposed Low-scale Residential and Mid-Scale Residential areas. The City should be making these decisions and not leaving them to developers who will not have Tacoma's or any Tacoma neighborhood's best interests in mind, and who only want to maximize profit. Such an inventory should also identify mature trees that should be preserved to protect Tacoma's tree canopy.

2. Program Does Not Address Housing Affordability

The Home in Tacoma plan is ostensibly directed at creating more "affordable" housing. However, when pressed for a definition of "affordable," one planner stated that it assumes an annual household income of about \$80,000. Two people making minimum wage will not have that income level. The proposal does not address the needs of minimum wage workers, single parents, or the working poor, let alone the homeless. New large construction in Proctor, Stadium, and 6th Avenue contain no "affordable" units. These large construction projects benefit only developers but do nothing for those who need housing and certainly do nothing for the communities in which they are built. Any benefits and approvals granted to developers, including variances, conditional use permits, fee waivers, and tax deferrals and exemptions, need to be strictly contingent on their including affordable and low income housing. Otherwise, the City should simply stop describing this proposal as a housing affordability plan.

While we understand that there are some benefits to densification, this proposal needs to be described and presented in an honest fashion, not as a housing affordability effort. And the claimed benefits to densification need to be set out and substantiated. Are they contributing to

better transit service? Are they doing anything to limit or redirect sprawling development in rural Pierce County? So far, neither appears to be the case.

As noted above, there are a lot of apartment buildings in the North Slope and Stadium neighborhoods. If you walk around both neighborhoods, you will see a lot of “vacancy” and “for rent” signs on these apartment buildings. Neither neighborhood appears to have a shortage of housing; it has a shortage of *affordable* housing. Giving developers carte blanche to build what they want where they want just leads to a glut of more expensive apartments as has happened in Seattle. It does not address the needs of families who want a house, and it does not do anything to house those who are struggling financially to meet their housing needs. Again, the only beneficiaries are the developers.

While there appear to be available apartments for rent, single family homes in this neighborhood are being snapped up within a few days of listing, at breathtaking prices. With our continuing experience with COVID, it is certainly possible that more people are wanting to live in single-family housing than more crowded apartments. We do not need to add to the glut of expensive new apartments.

3. Areas for New Development Should be Selected by the City and Not by Developers

The City has proposed two options for rezoning single-family neighborhoods – one that focuses the rezones on areas along traffic and transit corridors, and another that allows broader rezoning that encompasses most of the city’s residential land. Both of these proposals have problems. A middle-ground option that includes a building and land inventory would minimize these problems.

The “Evolve Housing Choices” scenario stands to put undue pressure on the rezoned areas from developers to acquire and demolish existing single and multi-family homes by restricting the areas. There is no distribution requirement that would avoid arterials becoming lined with larger apartment buildings, with remaining homeowners facing pressure to sell. While the “Transform Housing Choices” scenario relieves this pressure, it leaves too much discretion to developers to choose where to acquire and demolish buildings for redevelopment. As noted above, a land and building inventory could be used to identify locations appropriate for new construction or redevelopment. A smaller radius from traffic and transit routes would also provide enough opportunities for development to relieve the pressure on arterials, but would not leave the entire city wide open for predatory development. There also needs to be more attention to the need for a smoother transition between larger and smaller buildings, something that was ignored in the Proctor developments.

4. Design Standards and Design Review Process Remain Undefined

The proposal states that design review will be used, however there is no information about what that review will be or what the applicable standards will be. This is a fatal flaw. Without this

information, the City is basically saying “trust us.” Given the recent and ongoing experience of some neighborhoods with the Mixed Use Center developments, no neighborhoods are going to trust the City on this issue without more detailed information and a firm commitment to adhere to design standards in approving new development. Mixed Use Centers were originally intended to confine height bonuses within 200 ft. of the zone’s core to ensure transition to the MUC boundary, but it was gutted by City Council under developer pressure. Now the Proctor neighborhood and the 6th and Alder neighborhood have large, out-of-scale buildings that shade neighboring one and two-story properties and that provide inadequate parking for tenants, who then use the adjoining neighborhood street parking. We are unwilling to trust city government on the same promise that it has made and broken in the past.

In addition to more detail and a firm commitment on design review, we believe that there should be an evaluation process as new construction or redevelopment occurs to assess if it meets the claimed goals. This should include obtaining feedback from neighbors about what works and what doesn’t and should inform updates to the plan to avoid these problems. That would also address a major issue with the MUC plan, which is that it has seemed to be carved in rock and not amenable to needed changes. An evaluation also needs to include an assessment of whether a developer has conformed to the design standards, and remedies for situations in which they have not. Without enforcement, design standards will be useless.

Design standards also need to include provisions for parking. While Seattle has built up multifamily housing with little to no concern for parking, that is not a policy choice to emulate here. Tenants will not all be younger adults who ride bikes and scooters. We need to be attentive to the needs of all age and ability groups, and most of those will have cars. In fact, people who regularly use transit mostly still have cars. Plans need to consider how to incorporate off-street space for cars in a way that that space could be repurposed in the future if not needed for parking. For example, garages in larger buildings could be repurposed for storage. Backyard garages and carport areas could provide space for small cottages. But since that future is likely a very long way off, there needs to be a requirement for developers to include adequate off-street parking, and for that parking cost to be included in rent unless a tenant actually does not own a car. Addressing the impacts of parking will go a long way in getting more buy-in from neighborhoods on any comprehensive plan change or rezone plan. It would also serve to address traffic impacts by lessening street congestion.

Design standards and public review also need to address the impacts of mature tree removal, both street trees and trees elsewhere on properties. We want to preserve and add to Tacoma’s tree canopy, and removal of large, mature trees and replacement of them with saplings does not accomplish that. Changes to the comprehensive plan, irrespective of any future zoning changes, should include goals and policies to preserve all existing mature trees to help ensure sustainable air quality and temperature. We need to inventory and retain Tacoma’s population of mature trees, ensuring their preservation throughout the development process.

Design standards are also important for potential conversions of large homes into duplexes or triplexes. While that may be an appropriate use for very large homes on arterials, it's not something that we want to see happen on any large scale. When the North Slope Historic District was formed, the neighborhood included many larger homes that had been badly chopped up into apartments. Many neighbors have done a lot of work to restore these homes. The most extreme example is the former Northwest Kinetics property on North 5th between North Cushman and North Sheridan, which was restored into the two original homes. In addition, one of the properties was subdivided and provided space for a new home that fits well with the surrounding homes. If done well, some homes that are on or near arterials could be suitable for duplex or multifamily use. But we do not want to revisit the past when historic properties were subjected to unnecessary damage and loss of original materials and features, including loss of original entries and bad porch enclosures.

Because of the history with design standards being disregarded and poorly enforced, an important policy goal is preventing the City and developers from circumventing requirements such as scale and massing or lack of parking. For example, the current penalty for illegal demolition is wholly inadequate to stop it. Design standards need to include a review process that monitors and evaluates developer compliance, and penalties for noncompliance that are more than just the cost of doing business.

5. There Has Been Inadequate Public Involvement and Information

For over a year, we have had no opportunity to have any sort of public meeting or open house on this proposal due to the COVID pandemic. Coupled with the fact that Tacoma has much less available media than it did in years past, there has not been enough opportunity for the public to learn about this proposal and provide input to the City. We are aware of last year's changes to the Growth Management Act that preclude SEPA and GMA challenges to adoptions of comprehensive plans and rezone changes that are accomplished by 2023, which appears to be driving the City's schedule for this proposal. This statutory appeal exemption should not be used as a tool to avoid needed public participation or adequate environmental review.

Most significantly, the proposal has been touted as one that will increase housing affordability. However, there is no evidence that that will be the case, and the City has admitted that previous development that was supposed to include affordable units have not done so. Further, "affordable" is admitted to be a unit that requires a household income of about \$80,000, which is more than two minimum wage incomes. This is nothing less than misinformation about a proposal that stands to cause major changes to neighborhoods. We agree that there needs to be more affordable housing in Tacoma for low income and very low income families and individuals. However, this proposal does not address that but is being promoted as if it does. Based on the information provided, and the recent history with the MUCs, it appears to benefit only developers and absentee landlords and no one else.

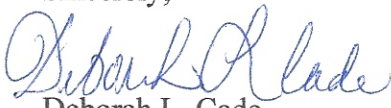
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COVID changed a lot about how businesses and governments do their work, and may have changed, at least for the near term, how and where people want to live and use public transportation. The Home in Tacoma plan does nothing to address that changed situation and appears to address perceived needs for middle to higher priced rental housing that may no longer be as much of a need. While there may still be a longer-term need, we have the time to put more thought into this proposal, flesh out more details like public design review, and better inform and involve more of the public. Right now, it appears to have been flying under the radar, and that simply adds to the lack of trust. In particular, there should be a lot more public involvement and public discussion about addressing the very real housing needs for the low and very low income rather than mere handing waving in its direction as this proposal does. That need will not be solved by giving developers free reign over Tacoma neighborhoods. It likely needs considerably more public resources (i.e., tax dollars) to solve.

While we have worked for over 30 years to improve and preserve the historic integrity of the North Slope neighborhood, we are aware of the needs to accommodate growth and to provide affordable and inclusive housing. As noted above, the district is an example of how a residential neighborhood that includes a mix of housing options can work, and a model for what types and scale of housing might and might not work in other neighborhoods. We just do not believe that the current Home in Tacoma proposal will be good for any Tacoma residential neighborhoods. At a minimum, we expect to see the proposal include commitments regarding avoidance of demolition of older properties, inventory of buildings and mature trees, a design review process that addresses transitions and that will be enforced and evaluated, realistic parking requirements, and an actual plan to make more truly affordable housing available. A lengthier and more inclusive public review process will help to accomplish that. We remain interested and committed to working with the Planning Department and the Planning Commission on improvements to this proposal.

Sincerely,

A handwritten signature in blue ink, appearing to read "Deborah L. Cade".

Deborah L. Cade

Chair, NSHD Board of Directors

Cc: Councilmember Robert Thoms
Councilmember Lillian Hunter