



March 8, 2024

Tacoma Planning Commission
747 Market Street,
Room 345
Tacoma, Washington 98402

Emailed to: planning@cityoftacoma.org

Re: Home in Tacoma 2 – Draft Implementing Development Regulations

Dear Tacoma Planning Commission:

Thank you for the opportunity to comment on the City's draft development regulations to implement Home in Tacoma (Home in Tacoma 2). The League of Women Voters of Tacoma-Pierce County (LWVTPC) appreciates the work that the City has done to create more housing opportunities and to address issues of housing affordability through Home in Tacoma.

LWVTPC is a nonpartisan political organization that encourages informed and active participation in government, works to increase understanding of major public policy issues and, after member study and agreement, works to influence public policy through education and advocacy. The comments in this letter reflect the League's positions adopted after study and member consensus.

The LWVTPC supports planning for higher densities through middle housing near transit in the City because it can increase the amount of affordable housing stock for all income levels. Housing for the lowest-income segments can also be provided through inclusionary housing - requiring a percentage of new development to be income-restricted.

The LWVTPC supports inclusive development to reduce the negative effects of gentrification and the disproportionate impacts of gentrification on communities of color. Methods we also support include but are not limited to community benefits agreements, land value capture, and removal of land speculation incentives.

1. What the LWVTPC supports in the draft Home in Tacoma 2 implementing development regulations:

- As lots redevelop, higher density housing designations along transit corridors between Mixed Use Centers (MUCs) should provide more residents along transit routes with access to services that are available in the MUCs, such as grocery stores, dry goods stores, medical offices, restaurants, and other services. The Draft Environmental Impact Statement (DEIS) notes that some of the highest ridership routes are along Pacific Ave and from South 19th to Bridgeport, where higher densities are planned. And, the DEIS states that the proposed zoning changes to higher densities could support Transit-Oriented Development (TOD). As such, the zoning would

Empowering Voters. Defending Democracy.

621 Tacoma Ave. S., #202 • Tacoma, WA 98402
2533-272-1495 • lwvtpc.org

likely reduce demand for vehicle trips and help expand transit mode share trips for Tacoma (see DEIS, section 4.3.2.3).

- Higher density zoning adjacent to the MUCs will also allow residents more walkable access to goods and services within the MUCs.
- Expansion of the City's inclusionary housing provisions in all Urban Residential (UR) zones creates significant opportunities for providing affordable housing, especially in the UR-3 zones.
- Development bonuses for increased density, area, and height can help meet the need for affordable housing for moderate and low-income households (rentals for households earning 60%-80% AMI (area median income) for rentals and up to 100% AMI for ownership).
- Reduced on-site parking requirements for new housing will allow more lot space for housing units on residential lots. Also, the DEIS states that pedestrian and bicycle access to new development would be enhanced with proposed standards to reduce the amount of space dedicated to vehicles.
- The expansion of the Multi-Family Tax Exemption to the UR-3 zone should also help to provide more affordable housing units.
- Requirements for planting new trees and/or retaining existing trees will provide green space, shade, and cooling as the climate warms, and better air quality in the City. Trees keep houses without air conditioning cooler and reduce bills in houses with air conditioning. They keep the sun from heating up sidewalks and streets where children are walking to school.

2. What should be addressed in the upcoming 2024 comprehensive plan update:

The LWVTPC recognizes that Home in Tacoma is limited to increasing the housing supply in Tacoma through revisions to the development regulations regarding residential zoning. However, some impacts created by this rezoning will have to be addressed when the City updates its comprehensive land use plan for 2044. Therefore, we have the following comments regarding what should be addressed as part of that update. More specifically, per the DEIS, the following should be addressed in the Transportation Management Plan (TMP).

- We support the pedestrian improvements listed in Section 4.3.3.2 of the DEIS including but not limited to:
 - Providing a safer sidewalk system;
 - De-prioritizing off-street parking;
 - Providing ample room for bicycle parking; and
 - Providing a safer and more friendly system for people with mobility issues.
- With increased density planned throughout Tacoma, the City will need to work with Pierce Transit to provide more frequent bus service, and more bus routes along arterials planned for increased housing density where transit is not currently provided. Bus rapid transit along major arterials such as 6th Ave and South 19th should be considered.
- A description of how the City will work with experienced non-profit organizations to develop housing specifically for people at and under 30% AMI should be included.

3. EIS Alternatives

Alternative 3 is the only alternative that meets the residential population allocation requirements. Therefore, the LWVPC supports Alternative 3, or a preferred alternative of Alternatives 2 and 3 that meets the allocation requirements.

Thank you for your consideration.

Respectfully,

A handwritten signature in blue ink, reading "Rosemary Powers".

Rosemary Powers, President