

# North End Neighborhood Council

## MIXED USE CENTER RECOMMENDATIONS

Dated July 7, 2007

SUBMITTED TO : Tacoma Planning Commission,  
Tacoma City Council,  
City of Tacoma Building and Land Use Services,  
Tacoma City Manager Eric Anderson\*

*Enclosed is the North End Neighborhood position on the mixed use centers including Proctor, the western portion of Stadium, and the north portion of 6<sup>th</sup> Avenue<sup>1</sup>. The recommendations reflect the position of the North End Neighborhood residents through the North End Neighborhood Council (NENC) and utilize many of the policy goals enumerated by the Tacoma City Council. The NENC believes the enclosed recommendations incorporate the best methodologies available in urban planning to create a pedestrian friendly “urban village” type design in the mixed use centers. In short, the NENC agrees with many recommendations of Tacoma consultant AHBL, Inc. such as removing the off-street parking requirement in NCX, CCX and UCX zones. This action would allow and encourage appropriate infilling and a higher density pedestrian friendly urban form rather than the sprawlsh car centric building and zoning code currently in place. However, because of the immediate proximity of the commercial parcels to single family homes, the NENC concludes that the current maximum height limit of 45 feet in Proctor is appropriate<sup>2</sup>. **The NENC requests that the enclosed recommendations be implemented as part of the Mixed Use Center revision.***

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\* Copies of the enclosed *NENC Mixed Use Center Recommendations* were also delivered to Tacoma Mayor Bill Baarsma, Tacoma City Council members, City Manager Eric Anderson, AHBL, Inc. and Tacoma Neighborhood Councils.

<sup>1</sup> Although the North End only covers three of Tacoma’s mixed use centers, the other mixed use centers may be benefited by the enclosed analysis as well, especially the smaller ones.

<sup>2</sup> The current allowable height in Proctor is 45 feet which is three and a half stories. With the removal of the off-street parking requirement, the NENC expects significant development will occur as many buildings are only one story, none are higher than 2 stories and there remain numerous surface level parking lots in Proctor, Stadium and 6<sup>th</sup> Avenue.

## I. Introduction:

The City of Tacoma is currently reviewing a number of policies concerning its 14 mixed use centers including off-street parking requirements, parking management, urban design issues, permissible building heights and the multifamily tax incentive program. The North End Neighborhood encompasses three mixed use centers in its area : Proctor, the northern portion of 6<sup>th</sup> Avenue, and the western portion of the Stadium District.

The Tacoma City Council recently retained consulting firm ABHL, Inc. which presented the *City of Tacoma Mixed Use Center Analysis* to the Tacoma Planning Commission on June 6, 2007.

On June 20<sup>th</sup>, 2007, the Tacoma city staff presented its own recommendations to the Planning Commission entitled *Staff Report and Proposed Amendment to the Comprehensive Plan*. The city staff report references the recommendations from ABHL but deviates from it in some significant ways. In many areas the staff reports seeks guidance from the Tacoma Planning Commission.

Because of the critical importance of the future success, success and attractiveness of Proctor, 6<sup>th</sup> Avenue and Stadium to the residents living in the North End Neighborhood, **the NENC makes the enclosed recommendations and requests they be adopted by the Planning Commission and ultimately by the Tacoma City Council.**

## II. Executive Summary

The North End Neighborhood residents through their neighborhood council support the city's efforts to create more dense mixed use centers in the city which are pedestrian friendly urban villages, less car centric, and better designed buildings.

With a relatively vibrant neighborhood business district, extremely low retail vacancy rate and an attractive urban form in Proctor, North End residents want to ensure than any changes are beneficial to the area as they are generally pleased with how Proctor looks and functions today. Stadium and 6<sup>th</sup> Avenue also have well designed buildings as well which are built to the edge of the street.

The *City of Tacoma Mixed Use Centers Analysis*<sup>3</sup> conducted by consultant AHBL, Inc. was a good investment for the city as it recommended many "best practices" to accomplish the council goals. More specifically, it set forth a methodology for Tacoma to implement to allow and encourage the building of a pedestrian friendly high density mixed use center. One of the critical steps recommended by AHBL, Inc. is the eliminating the off-street parking requirement

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<sup>3</sup> The Tacoma consultant AHBL, Inc recommendations *City of Tacoma Mixed Use Centers Analysis* can be found online at <http://www.cityoftacoma.org/File.ashx?cid=5800>.

in the mixed-use centers permitting the development of small lots with well designed buildings. Currently, Tacoma's antiquated off-street parking requirements have virtually mandated sprawlish low density developments in Tacoma where strip malls, poorly designed buildings and empty lots are the norm in many of Tacoma mixed use centers.

Removing the off-street parking requirement will create more affordable housing. New buildings should have continuous retail on the first floor, be built to the edge of the property, have few blank walls and should not have garage entrances and exits spilling onto the "main streets"<sup>4</sup> of Proctor, 26<sup>th</sup> Avenue,<sup>5</sup> 6<sup>th</sup> Avenue or in the Stadium District.

The attractive urban form in Proctor was only possible because it was originally built without the off-street parking requirement which was later enacted by the City of Tacoma<sup>6</sup>.

Because nearly every commercial parcel in Proctor is adjacent to a single family parcel (R-1) the NENC believes that the present three and a half story building height of 45 feet maximum is appropriate.

Much of Proctor, 6<sup>th</sup> Avenue and Stadium is composed of one-story buildings. There are a number of "strip mall" developments at the edge of Proctor that are available to be developed and filled in with attractive buildings. Implementing the recommendations of AHBL will permit significant redevelopment of Proctor and the other mixed use centers.

Finally, the city should promptly adopt the parking enforcement recommendations from AHBL on 6<sup>th</sup> Avenue of extending enforcement to 10:00 p.m. on Friday and Saturday night when the demand is the highest. Parking enforcement should be increased during periods of peak demand. Yet, presently, there is no parking enforcement after 6:00 p.m.

### **III. Goals (Output Measures) For Mixed Use Proposal**

The goal for the North End Neighborhood recommendation is to retain the small pedestrian friendly "urban village" design that Proctor and a number of the other

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<sup>4</sup> The term "main street" is referred to by AHBL and other urban designers as the main thoroughfare in a mixed use center and justify higher standards for urban design.

<sup>5</sup> Many of these standards are found in city codes in Seattle, Portland as well as *Codifying New Urbanism* published by the American Planning Association (2004). *The Municipal Research and Service Center of Washington* (MRSC) has accumulated a large resources and tools for more dense, pedestrian usable commercial centers. See <http://www.mrsc.org/Subjects/Planning/PlanIllust.aspx#compact>.

<sup>6</sup> For a graphical illustration of how the off-street parking requirement leaves commercial areas pocked with empty lots and hamper investment. See *Onsite Parking: The Scourge of America's Commercial Districts*, Mott Smith (2006)(attached).

mixed use centers have and to make sure future developments adhere to the same standards.

More specifically, the specific urban design goals and recommendations are to

- 1) Retain an appropriate maximum height in the commercial parcels given the fact they are immediately adjacent to single family housing.
- 2) Encourage the development of empty lots and underutilized properties with well designed mixed use buildings.
- 3) Require new buildings to have continuous retail on the first floor on Proctor and 26<sup>th</sup> Avenue in a consistent manner with the existing buildings
- 4) Require new construction be built up to the lot line as are most of the other current buildings.
- 5) Require garage entrances to be placed in locations other than the main streets of Proctor<sup>7</sup> and the other mixed use centers.

Because Tacoma's current building and zoning code do not require or even permit Proctor's attractive urban form to be replicated in newly constructed buildings, modifying the building code, if done properly, would benefit Proctor and the other mixed use centers greatly.

The NENC also supports the City of Tacoma goals for growth which

- 1) Protect critical/sensitive areas**
- 2) Protect industrial lands**
- 3) Protect single family neighborhoods<sup>8</sup>**
- 4) Direct density into centers**

The Tacoma City Council unanimously<sup>9</sup> voted to enact these priorities by enacting Resolution 37070 voted on December 19, 2006.

#### **IV. Methodology Used**

The enclosed "Mixed Use Recommendations" submitted by NENC used four primary sources for its analysis and recommendations:

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<sup>7</sup> The same requirement should be made on 6<sup>th</sup> Avenue and the main streets in Stadium.

<sup>8</sup> The North End Neighborhood Council recently submitted a letter in opposition to any expansion of the neighborhood code concerning attached or detached dwelling units as they would detrimentally affect the integrity of the North End Neighborhood.

<sup>9</sup> The Tacoma City Council vote was 8 voting in favor with one abstention.

- 1) Peer reviewed articles, books, and other sources<sup>10</sup> for designing urban mixed use centers.
- 2) Comparative zoning codes in other cities in Washington State and other cities<sup>11</sup>.
- 3) AHBL, Inc consultant report : *City of Tacoma Mixed Use Center Analysis* as well as the subsequent city staff suggestions.
- 4) Community input from North End Neighborhood residents<sup>12</sup>, and other community members.
- 5) Architects, planners, attorneys and other professionals in Tacoma.

Below is a comparative review of the recommendations of City of Tacoma consultant AHBL, Inc. presented to the Planning Commission, the city staff proposal and the enclosed North End Neighborhood Council proposal. Overall, the NENC proposal is closer to the AHBL recommendations<sup>13</sup>. The NENC believes the enclosed proposal is crafted to more closely accomplish the goals and policies enumerated by the Tacoma City Council as well as the North End Neighborhood residents and utilizes the best methodology designed to accomplish the goals.

## V. Comparisons of Recommendations

AHBL Consultant Recommendations	City Staff Proposal	North End Neighborhood Recommendations
<b>Parking : Remove Off-street parking requirements to infill mixed use centers, attract investment, create</b>	Suggests more “flexible” off-street parking regulations.	<b>Agrees with AHBL Consultant.</b> Off-street parking requirements decrease the housing density, force the

<sup>10</sup> Congress for New Urbanism (CNU) is the largest national group of architects and planners advocating for better designed urban centers. They have a large body of books and information on their web site at <http://www.cnu.org>. Salishan and UWT recently won design awards from CNU.

<sup>11</sup> Other cities which have removed their off-street parking requirements that are often referenced are Bellingham Municipal Code 20.12.010; Olympia Title 18 – UNIFIED DEVELOPMENT CODE 18.38.040; Seattle Municipal Code MNC 23.49.019, Portland Chapter 33.278.400 C(2).

<sup>12</sup> The North End Neighborhood Council has had numerous discussions of the policy issues for the mixed use centers including general meetings and committee meetings which are both open to the public with a published online agenda.

<sup>13</sup> On many issues, the city staff has requested input from the Tacoma Planning Commission.

high density, and affordable housing. This policy would follow model cities in the west coast and implement the best practices in urban planning.		construction of poorly designed buildings <sup>14</sup> (such as strip malls), deter investment and pose a significant barrier to affordable housing.
<b>Increase Maximum Height Permitted;</b> suggests raising height limit in Proctor, Stadium, MLK Upper Central, and MLK South to 65’ but “stepping down” in scale closer to boundary.	No specific proposal from the city.	<b>Retain Current 45 ft. Height Limit.</b> Because of the immediate proximity of commercial units in Proctor to single family housing, the permissible building height should be “stepped down” to 45 feet as they are nearly all on a residential “boundary.”
<b>Parking Management:</b> Extend enforcement hours to 10:00 p.m. in centers where evening demand is highest. Currently, an unlimited parking duration is permitted throughout the entire weekends on 6 <sup>th</sup> Avenue.	No specific proposal from the city.	<b>Agrees with AHBL Consultant. Enforcing 2 hours time limits</b> on 6 <sup>th</sup> Avenue on Friday and Saturday nights would benefit businesses and the adjacent neighborhood. When demand is highest, more enforcement action should occur, not less.
“ <b>Develop a sustainable Residential Parking Zone (RPZ)</b> to be created along residential streets that are not intended to serve demand generated by mixed use centers.”	No specific proposal from the city.	<b>Agrees with AHBL Consultant.</b> If neighborhoods are being adversely affected after the current on-street spaces are managed well, the creation of Residential Parking Zone would be appropriate.
<b>Modification to Multi Family Tax Incentive:</b>	<b>Modification to Multi Family Tax Incentive:</b>	<b>Maintain the Multi Family Tax Incentive in</b>

<sup>14</sup> “Planners cannot significantly improve the design of cities without reforming local parking requirements to emphasize quality over quantity...Reducing parking alone will improve urban design.” *Quantity versus Quality in Off-Street Parking Requirements, Journal of the American Planning Association*, Summer 2006, Vol. 72, No. 3 Vinit Mukhija and Donald Shoup.

<p>AHBL recommends generally keeping the tax incentive as is. However, they would remove Multi Family Tax Incentive for “established” mixed use centers such as Proctor and Stadium.</p>	<p>Suggest adding numerous requirements to potential users of tax incentive programs and new building design standards.</p>	<p><b>its current form with no revisions<sup>15</sup>.</b> The Tax incentive furthers the council’s policy priorities to: comply with GMA, reduce sprawl, reduce road building costs, reduce car reliance, traffic congestion and pollution, revitalize downtown and the mixed use centers<sup>16</sup>.</p>
<p><b>Bonuses and “open space” issues</b></p> <p>No recommendation is made from AHBL on these issues.</p>	<p>Suggests offering density bonuses when certain design criteria are met.</p> <p>Suggests requiring “open space” in mixed use buildings.</p>	<p>Regulations should be streamlined so that a mixed use building is the preferred model rather than a single story building.</p> <p>Oppose requiring or encouraging “open space” in a mixed use building as they do more harm than good while undermining the objective to place housing density in the mixed use centers.</p>

**VI. Removal of Off-street Parking Requirements to Permit Infilling of Empty Lots, Redevelopment of Underutilized Parcels and to Allow the Creation of Affordable Housing.**

The NENC recommends that the Planning Commission accept and adopt AHBL’s recommendation that the city remove the off-street parking requirements in the city’s mixed use centers including Proctor, 6<sup>th</sup> Avenue and the Stadium District.

*Consider removing parking requirements in NCX, CCX, and USX zones in multifamily housing where parking management policies are in place.*

<sup>15</sup> None of the many Washington cities that currently use the multifamily tax exemption have different building codes for the users of the incentive program. The NENC believes the same high standards for buildings should exist regardless if the incentive is used or not.

<sup>16</sup> The NENC also believes that infilling the Tacoma’s mixed use centers has the potential benefit of retaining a higher student population in neighborhood schools which reduce the pressure to close them.

See page 46 of AHBL recommendations. Following the recommendations of AHBL would implement the “best practices” for creating a successful commercial center, it would follow the practice of other cities which have done so<sup>17</sup>. A plethora of articles, books on urban design published over the past 15 years overwhelming support removing the off-street parking requirements in commercial business districts<sup>18</sup>.

Permitting the market to determine the number of units to be built is a very modest step to move Tacoma from a suburban building code<sup>19</sup> to more an urban one which can create attractive pedestrian friendly commercial centers. Some cities such as Seattle and San Francisco goes much further and limit the number of parking spaces that can be built. AHBL and the NENC simply recommend that the city remove its antiquated building code which demands that more spaces be built than the market demands for each building. Developers will still be able to build as much parking that is appropriate<sup>20</sup>.

### **A) Parking Requirements Detrimental Effects on Attracting Investment in Commercial Areas, and on the Density of Housing.**

AHBL recommends removing the off-street parking requirement to encourage investment and to “direct density into centers,” a policy which the City Council has repeatedly endorsed. An excellent article on the negative effects of the off-street parking requirement in urban centers is

#### *Onsite Parking: The Scourge of America's Commercial Districts*

*Onsite parking requirements, which have crept into many cities' laws over the past 50 to 70 years, have sucked the potential out of commercial properties on main streets and in downtowns everywhere. Perhaps more than anything else, rules requiring onsite parking -- to be distinguished from "on street" or "offsite" parking -- have created the blighted conditions that characterize many older North American commercial districts and boulevards.*

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<sup>17</sup> Seattle and San Francisco have removed the off-street parking requirement in their mixed use centers. Additionally, Bellingham, Olympia, and Portland have removed the off-street parking requirement in their downtown districts..

<sup>18</sup>*No Parking: Condos Leave Out Cars*, New York Times (2006)(“Last year, for example, Seattle reduced parking requirements for multifamily housing in three of the city’s major commercial corridors. Next month, the City Council will vote on a proposal to eliminate minimum parking requirements in Seattle’s six core urban districts...”) *High Cost of Free Parking*<sup>18</sup> (Shoup 2004); “Off-street parking requirements especially harm the CBD. High density is a prime advantage of the CBD because it offers proximity to many social cultural and economic activities. The clustering of museums, theaters, restaurants, stores and offices is what a downtown can offer but other areas cannot. Parking requirements thus reduce the CBD’s attractiveness by undermining the essential features that make it attractive-high density and accessibility.

<sup>19</sup> *No Parking: Condos Leave Out Cars*, New York Times (2006)(“Minimum parking requirements became popular in the 1950s with the growth of suburbia”)

<sup>20</sup> To the extent Tacoma’s off-street parking requirement forces a developer to build more parking than they desire, the off-street parking requirement becomes a de-facto impact fee than would not be imposed in many other cities.

Planetizen, *The Planning and Development Network* (March 31, 2006). Removing the off-street parking requirement is critical for developing empty and underutilized lots which pock Tacoma's mixed use centers so that they may be infilled with appropriate buildings.

## **B) Off-Street Parking Requirements Poses an Unnecessary Barrier on the Creation of Affordable Housing in Tacoma**

The City of Tacoma has repeatedly stated its support of the creation of affordable housing in Tacoma.

AHBL recommendations for Tacoma reflect the well accepted connection between off-street parking requirements and the price and supply of affordable housing:

### *4. Unbundle Parking from Condominiums and Rental Units*

#### Program Description

*Housing affordability is dramatically affected by the requirements to provide off-street parking along with housing units, and production of multifamily units without off-street parking in transit-oriented areas significantly increases the supply of affordable housing by enabling more households to qualify for mortgages. Unbundling parking from new dwelling units offers choices to buyers by offering sale of parking stalls in structures independently from residential units.*

#### Recommendations

*Require (zoning code) unbundled parking supply in new residential projects in Centers with "established" and "emerging" multifamily residential markets:*

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#### Precedents

*Successful programs in Cities of Portland and San Francisco*

See page 46 of AHBL recommendation on the issue<sup>21</sup>.

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<sup>21</sup> The authoritative text *High Cost of Free Parking*, Shoup (2005) published by the American Planning Association notes "Off-street parking requirements harm low income and renter families because they own few cars but still pay for parking indirectly, and the hidden costs for all the required parking consume a greater share of their income." Pg 65. See also : *Housing Affordability: Final Report and Recommendations from the Pierce County Housing Affordability Task Force* which repeatedly discusses how the off-street parking requirement poses a significant barrier for the affordability of housing in Pierce County; *Parking Requirements and Housing Affordability: A Case Study of San Francisco* (1998) ("...it was estimated that tens of thousands of additional households could qualify for home mortgages for units without off-street parking if those units could legally be provided... Todd Litman estimated that one parking space per unit increased the cost by 12.5%... Thus, because parking places are required, more up-scale features are typically included in the unit and this causes their prices to rise even further");

The AHBL recommendations permits residents to have the ability to purchase parking separately from housing thereby making housing more affordable:

De-coupling housing and parking as other cities have done will give Tacomans an ability to be able to purchase housing easier and weigh the cost of parking with other transportation alternatives such as transit or car sharing.

### **C) Benefit to the Environment**

Removing the off-street parking requirement will result in the reduction of, traffic congestion and greenhouse gases being omitted<sup>22</sup>. Currently, the City of Tacoma essentially requires each and every residents who seeks to obtain housing in downtown or in the mixed use centers to either buy or rent a parking space which forces residents downtown to lead a car centric lifestyle and undermines the many policies the city council have stated they support. If residents are given a choice as to how much parking they wish to buy, as they are allowed to in other cities, some will choose alternative modes of transportation.

## **VII. Develop Residential Parking Zones When Necessary**

City of Tacoma consultant AHBL suggests that the city

*“Develop a sustainable Residential Parking Zone<sup>23</sup> (RPZ) to be implemented along residential streets that are not intended to serve demand generated by centers.”*

The North End Neighborhood Council agrees with this recommendation. However, this step need only be taken after implementing AHBL’s recommendation to enforce time limits on parking during times of peak demand at night.

Currently, anyone is allowed to park their car continuously from 4:00 p.m. Friday to 10:00 a.m. Monday during the highest demand periods on 6<sup>th</sup> Avenue for free. Adopting AHBL’s recommendation to extend traffic enforcement to 10:00 p.m. on peak nights would likely solve much of 6<sup>th</sup> Avenue’s parking issues<sup>24</sup>. Parking enforcement in the 2 hour zones on 6<sup>th</sup> Avenue should increase during periods of greater demand for parking, not decrease.

## **VIII. Height Limits in Proctor Should Remain at 45 Feet**

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<sup>22</sup> The issues of trip reduction, reduction of greenhouse gases and traffic issues are a current concern to the Tacoma City Council.

<sup>23</sup> A Residential Parking Zone is a curb space set aside exclusively for residents in the area.

<sup>24</sup> Certainly the enforcement of the 2 hours zones during peak periods should occur before the city consider more drastic or costly steps.

Because of the limited size of the Proctor mixed use center and the immediate proximity of nearly every commercial parcel to single family homes in Proctor, the current height limit of 45 feet should be retained.

Consultant ABHL placed Proctor, Stadium, MLK Upper Central, MLK South in the same category and suggested that the height be increased to 65 feet in each center. However, there are many factors which differentiate the districts from Proctor which would make the current 45 foot height limit appropriate<sup>25</sup>.

First, Stadium, MLK Upper Central and MLK South are all within the now enlarged “downtown” which the council has designated for a higher concentration of growth. In contrast, Proctor is relatively remote.

Second, Stadium, MLK, Upper Central and MLK South are all much closer to transportation systems such as multiple bus lines, freeway entrances and light rail downtown.

Third, consultant ABHL recommends that the height of the commercial buildings be “stepped down” closer to the boundary between the commercial area to the residential housing. Because nearly all of the commercial parcels in Proctor are immediately adjacent to single family residential housing, a height of 45 feet is consistent with the recommendations of ABHL which specifically recommends a lower height at the boundary areas.

Fourth, Proctor is functioning well economically with very few retail vacancies. Therefore, there is less of a compelling interest to create additional development in Proctor as there is in other mixed use centers.

The NENC believes that given that well over half of the commercial parcels in Proctor are either one story or empty lots, the current 45 foot height limit (3 and half stories) coupled with the removal of the off-street parking requirement should encourage and enable significant redevelopment in the future.

**IX. The Multi Family Tax Exemption Should Remain Unaltered to Focus Growth in Mixed Use Centers and Downtown Tacoma Rather Than Inappropriately in Neighborhoods or at the Edge of the City (Suburbs).**

The multi family tax incentive program and the Growth Management Act are designed to reduce sprawl : place new housing in the commercial districts in cities rather than at increasing distances on the city’s edge.

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<sup>25</sup> The City of Tacoma can set NECX zones at different heights. The NECX zones are different from each other and it is appropriate to treated them differently.

The tax incentive program has the benefits of protecting single family neighborhood, reducing sprawl, revitalizing mixed-use centers, reducing traffic congestion and pollution<sup>26</sup>.

The NENC understands that the population of Tacoma will increase significantly in the coming years. Rather than forcing housing inappropriately in established neighborhoods with small dwelling units, which the NENC has opposed, the NENC strongly recommends that new housing be placed in downtown and in the mixed use centers. Consequently, in order to implement these priorities, the NENC opposes any additional burdens to the multi family tax exemption for either downtown or the mixed use centers. If additional barriers to the tax incentive program occurred, housing would increasingly be built on the edge of the city and in the county where land is the cheapest and greater pressure would be put on the neighborhoods in Tacoma to accept inappropriate developments.

### **A) Multi Family Tax Incentive and Building and Zoning Codes**

As discussed above, the NENC have set forth a number of changes to the building codes which will encourage the development infilling of Proctor, 6<sup>th</sup> Avenue and Stadium while creating good urban form which is pedestrian friendly and attractive. The city should not have two different building codes, one with the multifamily tax incentive program and one without. Buildings should be designed and built well regardless if they qualify for the tax incentive program or not. A review of the codes in other cities reveal than none of them have different design standards for users of the tax incentive.

### **B) The Proposal to Require or Encourage “Open Space” in Mixed Use Developments Should Be Declined<sup>27</sup>**

North End residents certainly value the public open space they have including parks and schools. North End residents have also worked to beautify the small public open spaces they have.

However, one of the central characteristics of a good urban form in a mixed use “urban village” is that the buildings are connected with the street and the retail on the first floor of buildings and leave their buildings often to be “eyes on the street.”

Private spaces such interior courtyards make buildings more insular, cause residents to lead more of their life within the building to the detriment of the

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<sup>26</sup> The latest demographic information shows that the population of the City of Tacoma is increasing at a slower rate than the rest of Pierce County. This indicates that most of the new housing is still unfortunately being built outside of the city limits and failing to accomplish the goals of the Washington Growth Management Act. Incentives for infilling Tacoma’s downtown and mixed use centers need to be increased, not decreased.

<sup>27</sup> The NENC realizes that the “open space” issue for a PRD is another issue completely. In a PRD, the developer owns the entire area.

surrounding neighborhood. Builders are certainly free to provide whatever common areas they wish for their residents and the potential residents can weigh the benefits and drawbacks of each building. However, the city should not encourage or require such building design as they create no public benefit and in fact are detrimental.

Even if open spaces were created that were accessible to the public it would likely cause the building to be set back from the property line which is undesirable. This requirement would also lower the density of developments and poses another barrier to a well designed development.

Also, most of the commercial lots in the mixed use districts are small. There is simply no room in a small commercial lot for an “open space.” Finally, A small alcove like “open space” on a commercial lot, if it were open to the public, makes it less likely it would be designed as well from a crime prevention<sup>28</sup> standpoint. Pedestrians could be faced with walking up to a blind corner.

## **X. Conclusion**

The North End Residents believe that the enclosed recommendations will provide a significant incentive for attractive infilling of the mixed use centers along with the incentives and mechanism to do so. The NENC joins city consultant AHBL in recommending the removal of the off-street parking requirement. Such a step is necessary for a good urban design and will encourage redevelopment and investment in Proctor at a reasonable height.

The NENC recommends that the current 45 foot height limit be retained as Proctor is a small and narrow mixed use center and nearly every commercial parcel is on the border of residential properties. A 45 foot height limit is approximately 3 and a half stories and is appropriate height when it is adjacent to a single family home.

The NENC recognizes that there are choices on growth to be made and directing the growth with into downtown and the mixed use centers is the preferable location rather than attempting to force additional dwelling units onto existing lots. Thus, the NENC supports the multi-family tax incentive to direct growth downtown and in the mixed use centers to reduce sprawl, protect neighborhoods, protect critical areas, reduce pollution, reduce congestion and to create more affordable housing.

The NENC also requests that additional urban design requirements in the Proctor and 6<sup>th</sup> Avenue districts be enacted so that new construction can be more pedestrian usable, friendly and attractive.

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<sup>28</sup> See CPTED Principles : Crime Prevention Through Environmental Design.