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May 17, 2019

Planning Commission
747 Market St, Room 349
Tacoma, WA 98402

Re: Comments on Future Land Use Map; Comprehensive Plan; and Manitou Annexation

Dear City of Tacoma Planning Commissioners,

Thank you for the opportunity to comment on the 2019 Amendment to the Comprehensive Plan and Land Use Code. My name is Molly Nichols, and I am the Tacoma Program Manager with Futurewise, a statewide nonprofit that prevents urban sprawl and advocates for sustainable and equitable land use policies. Over the past year we have supported tenant organizing for tenant protections and affordable housing in Tacoma. This letter comments on the Future Land Use Map Implementation, the Affordable Housing Action Strategy Incorporation into Comprehensive Plan, and the Manitou Potential Annexation.

Future Land Use Map Implementation

We support the proposed rezones and amendments that make our zoning consistent with Tacoma's comprehensive plan. As our region grows, we need policies in place for compact and connected neighborhoods to manage the growth and ensure equitable access. The proposed zoning changes create opportunities for more residents to live in transit friendly corridors with more amenities. They also help local commercial districts thrive by bringing more residents closer to small businesses, and they support our public transit systems by bringing more riders to the corridors.

These changes also create more diverse housing options. Most of Tacoma is zoned for single family housing, while the regional growth and mixed-use centers are zoned high density multi-family. These proposed rezones create more opportunities for duplexes, triplexes, townhomes, and small apartment buildings—options that will help to meet the diverse housing needs in our community.

Lastly, the proposed changes also begin to address the impacts of redlining and other historically exclusionary practices. Until 1968 when the Fair Housing Act was passed, people of color were legally excluded from buying homes in certain neighborhoods in Tacoma and across the country. Banks refused to lend money for families to purchase homes, and homeowner associations created restrictive covenants. People of color were cut off from neighborhoods like the North End, with amenities including parks, libraries, grocery stores, strong performing schools, adequate transportation infrastructure, and more. While redlining may no longer be legal, de facto versions of it still occur, and we still live with its legacy. We need changes in policies to begin to reverse past and present harm.

Affordable Housing Action Strategy Incorporation into Comprehensive Plan

We fully support the incorporation of the Affordable Housing Action Strategy into the Housing Element of the City's Comprehensive Plan. Not only does this update the data in the plan and indicate more urgency and action around this issue, but it also begins to address the impacts of historically inequitable zoning decisions and housing policies.

I do want to highlight two omissions from the Affordable Housing Action Strategy that should be brought into the Comprehensive Plan. Futurewise shared these in September when the Affordable Housing Action Strategy was approved by council, and the items are now part of Resolution 40328 (sponsored by Councilmember Beale).





This resolution has not yet been voted on by City Council, but the contents are worth your consideration in this amendment process.

Resolution 40328 proposes the following: “the Planning Commission should develop a housing racial justice policy in the City’s One Tacoma Comprehensive Plan that establishes that the overarching housing and land use policy of the City is to redress institutionalized racism in past and present housing policies, and vigorously commence efforts toward socioeconomic and racial integration into the fabric of Tacoma’s neighborhoods through zoning, programs, funding and policy.” Our current housing system (including our segregated neighborhoods where people of color have less access to amenities and opportunities) is not an accident, but, as Richard Rothstein argues in *The Color of Law* a direct result of segregationist government policies. It is going to take bold government action to reverse this past and present harm, and this Planning Commission plays a vital role.

Therefore, Tacoma’s comprehensive plan should more explicitly name the historical inequities of redlining, exclusionary zoning, and restrictive covenants to ensure that communities of color and other residents who have been excluded are directly benefiting from new housing policies.

We understand there is a proposal to replace the PSRC equity maps currently in the Housing Element of the Comprehensive Plan with the City of Tacoma’s new equity maps. Including this more local and updated data is worthwhile. The plan should include access to the entire Equity Index to reveal the demographics of neighborhoods in relation to opportunity. You might also include historical maps to help track the policies and zoning that have determined our current segregated neighborhoods.

Another opportunity for the Planning Commission is to more explicitly lay out the relationship between affordable housing and transportation, especially public transit, in the Housing Element of the Comprehensive Plan. Transit service was a key factor for the area wide re-zones, and the Comprehensive Plan currently maps transit priority networks, which is excellent. With respect to our housing policy, we need to upzone and pass inclusionary housing policies in frequent transit corridors, for example places ¼ mile from buses that run every 15 minutes. This creates mixed income neighborhoods and ensures low income people can access transportation and other amenities.

We also support amending the Comprehensive Plan to include coordinating public investments with affordable housing, expanding tenant protections (especially Just Cause, which requires a legitimate business reason for a landlord to terminate a tenancy), and prioritizing households with the greatest need. The plan could also name the importance of providing incentives for affordable accessory dwelling units and the reduction or elimination of parking requirements. Unnecessary parking requirements direct investments toward housing cars instead of housing people.

Manitou Potential Annexation:

The Manitou unincorporated area of Pierce County should be annexed to the City of Tacoma, as provided for in the Growth Management Act. Cities have the authorities to provide good public facilities and services long-term to urban areas. The best option for rezoning is Option 2 which includes an R3 designation instead of the R2 designation in Option 1. The R2 designation is a significant down zone from the current Mixed Use District designation which allows 60 foot residential buildings. R3 would not significantly impact the current residential area, and it would begin to meet the goal of creating more opportunities for missing middle housing.

Thank you for considering these comments and for your service on this commission. If you require additional information, please contact me at 412-216-9659 or email molly@futurewise.org.

Sincerely,

Molly Nichols
Tacoma Program Manager, Futurewise

