

APPENDIX C
**EXPANDED COMPREHENSIVE
PLAN POLICIES**

Generalized Land Use Element

- Growth and Development (pp. LU-6 - LU-7)

Intent - The City will continue to be the focal point of growth for the greater Tacoma area and a growth center for the region and the state. As such, growth and development should be coordinated with the policies of Pierce County, the Puget Sound region and the State of Washington. It is intended that growth and development occur in an orderly and desirable manner in accordance with citizen needs and desires, the physical characteristics of the land and the City's ability to provide the necessary services.

Development of medium and high intensity uses will be encouraged in concentrations to use the land more efficiently, limit the spread of higher intensity development, protect low intensity residential neighborhoods and enable the economical provision of public facilities and services.

New development should be compatible and “fit in” with the character and nature of existing development. Compatible developments possess attributes similar and consistent with the main or essential characteristics exhibited by surrounding developments. These characteristics may include building shape and style, orientation and setbacks, architectural details, circulation patterns, location of parking, landscaping, open spaces and streetscape. This does not mean that dissimilar uses cannot be located in the same area, but rather these uses must be designed, scaled and situated in such a way that they are capable of existing in a harmonious manner. An appropriate location for dissimilar uses would be on sites possessing characteristics such as a natural buffer, a location between different intensity levels of development, or a location on a higher volume arterial.

Tier Delineation -

Tier I – Primary Growth Area:

Lands within this designation are areas already characterized by urban growth and the key public facilities and services are available and either meets the adopted levels of service standards or are planned to meet the standards through programmed capital investments within the next six years. Mixed-use centers and major employment centers such as the Port of Tacoma are included in Tier I. Tier I areas include enough land to provide for the population and employment needs for the next six years. Generally, the majority of forecasted growth for the next six years will occur in Tier I. Under certain circumstances, some development may occur in Tier II and in limited instances within Tier III.

Tier II – Secondary Growth Areas:

Lands within this designation are areas already characterized by urban growth and where key public facilities and services are generally available. One or more of the key facilities may not be available or do not meet the adopted level of service

standard. In addition, no capital investments are planned which will make one or more of the key facilities available or adequate. Generally adequate public facilities and services will be provided in Tier II areas after the initial six years, generally within years 7-13. Both public and private purveyors may provide services.

Tier III – Tertiary Growth Areas:

Land within this designation in areas adjacent to areas already characterized by urban growth, but may not necessarily have urban levels of development. Generally, these areas are not presently served with adequate key public facilities and services.

LU-GGD-2 Growth Rate

Foster orderly, desirable growth in appropriate locations at a rate consistent with citizen desires and the provision of adequate services and facilities

Comment: As identified in the DSEIS, adequate services and facilities to support *The Point at Northshore* would be required if the development is approved. However, of the hundreds of written comment letters received from citizens living in the immediate vicinity of the golf course, none expressed a desire for the *Proposed Action* to be developed. Therefore, this development may be inconsistent with some aspects of this policy.

LU-GGD-3 Concentrated Development

Growth and development throughout the urban area should be regulated, stimulated, and otherwise guided toward the development of compact concentrated areas to discourage sprawl, facilitate economical and efficient provision of utilities, public facilities and services, and expand transportation options to the public.

Comment: The *Proposed Development* is consistent with this policy. Development of *The Point at Northshore* would be an infill project that would concentrate development of new housing in an area already characterized by urban housing. Housing in the *Proposed Development* would be located near existing Tacoma Schools and Parks, and near City of Federal Way urban services. Analysis of public facilities such as schools, parks, and traffic infrastructures can be found in DSEIS **Section III**.

LU-GGD-4 Development Timing

Direct development in accordance with tier designations to ensure that it is timed and properly located so as not to prematurely change undeveloped land to urban uses nor intensify the development inconsistent with the character of an area.

Comment: As long as the impacts to public facilities are mitigated, as described in the DSEIS, the *Proposed Development* would be consistent with this policy. The North Shore Golf Course contains three tier designations. The majority of the site is located within the Tier I, Primary Growth Area. The southeasterly portion of the site is located within the Tier 2, Secondary Growth Area. Finally, the northeasterly portion of the site, in the general vicinity of the large pond spanning the On the Green community and the golf course and continuing south to the golf course pond near the southern end of the On the Green apartment complex is within the Tier 3CR Critical Area designation. Above are summaries of the Tier designations from the

Comprehensive Plan. The *Comprehensive Plan* does not provide a description of the Tier 3 CR Critical Area designation.

Proponent proposes to install necessary utilities and infrastructure to accommodate the facility demands of *The Point at Northshore* residents. DSEIS **Section 3.1 Land Use Compatibility and Aesthetics**, analyzes three scenarios: *No Action*, *Proposed Action*, and *Proposed Action Alternative* with regards to development intensity and consistency with the character of the neighborhood. The DSEIS identifies significant adverse impacts to Land Use Compatibility and Aesthetics and provides mitigation to reduce impacts such as a vegetated transition zones surrounding the *Proposed Development*.

LU-GGD-5 Concurrent Provision of Services

Development shall be approved only if adequate public facilities or services needed to serve the development are available at the time the demand for the facility or service is created or within a reasonable time as approved by the city.

Comment: Consistent with this policy, the City has reviewed *The Point at Northshore* for demands to public facilities resulting from the *Proposed Action*. The DSEIS includes mitigation measures addressing the Proponent's responsibility to provide adequate public facilities and/or services necessary to serve the development. Additionally, *The Point at Northshore* must comply with all City standards, regulations, and policies relating to concurrent provision of services. The Proponent will be required to show compliance with all City standards and required mitigation measures at the time of Final Plat approval.

LU-GGD-6 Level of Service

No development shall be approved which would result in a reduction in the adopted level of service standard for any needed public facility or service.

Comment: Consistent with this policy, the City has reviewed *The Point at Northshore* for impacts to public facility level of service resulting from the *Proposed Action*. If the Proponent complies with City standards, regulations, and ordinances relating to public facility levels of service, along with mitigation measures identified in the DSEIS, no reduction in the adopted level of service standards for public facilities or services is anticipated.

LU-GGD-7 Inter-jurisdictional Coordination

Work in cooperation with Pierce County, other cities and towns, special districts and other public agencies to address land use development and service issues of mutual concern.

Comment: In preparation of the DSEIS and FSEIS, the City has acted in a manner consistent with this policy. The City has provided nearby cities, counties, and other governmental and non-governmental agencies an opportunity to comment on this project through the normal application review process and the DSEIS comment period. The responses, specifically to the DSEIS, are contained within the FSEIS. Responses from various jurisdictions and agencies will also be incorporated into the Public Works Staff Report where appropriate.

LU-GGD-8 Infill Development

Encourage the development of vacant land within built-up urban areas in order to limit sprawl and decrease travel needs.

Comment: The PRD modification is consistent with the *Comprehensive Plan* policy to support infill development as all of the proposed residential units and associated infrastructure will be located within the City's urban growth area. Specifically the project site is designated as Tier 1 Primary Growth Area and Tier 2 Secondary Growth Area, and Tier 3CR Critical Area by the *Comprehensive Plan* (see description of tiers above in the Comment for policy LU-GGD-4). Under the *Comprehensive Plan*, Tiers were developed based on land use characteristics, the availability and adequacy of public facilities and services, and projected growth needs (see policies LU-7 – LU-8). The public facilities and services considered key to supporting development are:

- Storm Drainage
- Sanitary Sewers
- Domestic Water
- Fire Protection (including adequate fire flow)
- Police Protection Services
- Roads and Public Transit Services

- Urban Growth Tiers (p. LU-7)

Intent - It is intended that development projects that proceed in either Tier II or Tier III areas be developed at urban densities and intensities consistent with the plan policies. For developments that are to be phased based on the current availability and adequacy of facilities and services, development techniques should be employed to allow future urban levels of development on the remainder of the property when services are extended.

LU-GUGT-1 Encourage Development

Provide incentives to encourage development and redevelopment of lands consistent with the time frames of designated growth tiers.

Comment: As described above (see Comment LU-GGD-4), if through the SEIS process a conclusion is reached that development of certain portions of the North Shore Golf Course would be inconsistent with the time frames of the designated growth Tiers—for example, if any portion of the golf course must be retained to satisfy the open space requirements of the PRD—then development plans may be conditioned accordingly. Mitigation conditions concerning timing of growth and adequacy of public facilities would ensure the development is consistent with this policy. The DSEIS provides a detailed analysis of required open space depending on several scenarios of development and what type of land should be considered as required open space.

- Urban Aesthetics and Design (page p. LU-11)

Intent - It is the desire of the city to promote and inspire design excellence. The image of Tacoma perceived by residents and visitors is based upon public and private development, the natural environment and the variety of activities and attractions available in which people can participate and enjoy. Tacoma aspires to be pedestrian-oriented and understands the importance of human scale, pedestrian access and circulation to the livability of the city. The built environment defines the habitability and the well being of community. Contrast and harmony are qualities that provide interest to the design of public and private buildings. Public squares and assembly points provide areas for community activities and serve as focal points. Street furniture, landscaping, lighting and artworks are elements of the pedestrian environment and define the character of the streetscape. Safety and security are major considerations. Sensitively designed new development and redevelopment which emphasizes the importance of aesthetics in design with respect to scale, proportion and the use of compatible materials can further enhance Tacoma's built environment.

LU-UAD-1 Design and Aesthetics

Emphasize good design and aesthetics by recognizing and retaining existing scale, proportion and rhythm and using compatible materials in new development and redevelopment.

Comment: The *Tacoma Municipal Code*, under which this application is considered, does not presently prescriptively regulate the aesthetics of single-family structures for lots that meet Code prescribed standards such as lot size and dimensions, and building height and setbacks. In the Planned Residential Development zoning overlay, the minimum average lot area is 5,000 square feet and the minimum average lot width is 50 feet with 7.5 foot side yard setback requirements (*TMC* 13.04.240 & 13.06.110).

The scale of development in the single-family detached homes of *The Point at Northshore* may be inconsistent with this policy. Many of the lots for the proposed single-family detached homes at *The Point at Northshore* are smaller than the 5,000 square feet standard. The Proponent has requested a reduction in minimum side yard setbacks to 5 feet and a reduction in average lot width to 40 feet. Divisions I, II and IV, of the existing *Northshore Country Club Estates* contain single-family detached homes which abut *The Point at Northshore* site. On average, these existing surrounding adjacent lot sizes range from approximately 10,200 square feet to 12,200 square feet. Further, these existing lots typically meet or exceed the 7½ foot side yard setback requirement and the average lot width requirement of 50 feet. The Wind Dance community, which is located in the central portion of the overall golf course, was granted side yard setback variances in 1996 to allow the single-family homes to have side yard setbacks of 5 feet.

While the proposed townhomes in both the *Proposed Action* and *Proposed Action Alternative* appear consistent with the low intensity designation regarding density, it is noted that significant variances and reductions to minimum development standards such as side yard setbacks, lot width and lot area reductions would be necessary based on the *Proposed Action*. While the townhouses are proposed to be located near the majority of existing condominium and multi-family

development, the proposed townhouses would be inconsistent with this policy, because they would be out of scale and rhythm with existing development. The proposed townhouses in *The Proposed Action* would be the first townhouses to be included in the *Northshore Country Club Estates PRD*. The PRD is presently comprised of single-family detached homes, multi-family rental units (apartments) and ownership units (condominiums). The townhouses are proposed to contain an average lot area of approximately 2,100 square feet and varying average lot widths of approximately 20 feet. The townhouses are proposed to be located near the majority of the existing condominium and multi-family development. The townhouses will also be situated near the Wind Dance community of single-family detached homes which contain an average lot area of approximately 5,800 square feet, an average lot width of approximately 50 feet, and reduced side yard setbacks of 5 feet.

LU-UAD-2 Encourage Landscaping

Encourage the use of landscaping for buffer, screening and beautification purposes. Encourage the use of drought tolerant species to conserve water and ensure plant survival.

Comment: To date, the Proponent has submitted typical landscape plans for the proposed entrance along 33rd Street NE, parks, trails, and roadway designs. However, the landscape plans do not provide specifics on amount, type, or degree of screening that the landscaping will provide, or tract specific landscaping information for the entire site. The Proponent has indicated they will maintain some of the existing trees and landscaping presently located on the golf course; however the exact location, type, and quantity of the trees has not been clearly described given the placement of proposed roads, structures, and grading. Although the *Proposed Action* and to a greater extent *The Proposed Action Alternative*, provide vegetative buffers, it is not clear whether species will be drought tolerant and conserve water; therefore, we cannot yet determine if the proposal is consistent with this policy.

The View Analysis Video and snapshots contained within the DSEIS simulate the tree-planting plan of the *Proposed Action* and the *Proposed Action Alternative* after 10-20 years of growth.

- Residential Development (pp. LU-18 – LU-20)

Intent - The single-family detached house, that is, a single home on an individual lot, is the most predominant type of residential structure in the city. It is the preferred living mode for many people and is associated with a relatively quiet and stable neighborhood environment. Other types of housing such as duplexes, apartments, townhomes and condominiums are also needed and desired by large segments of the population. Housing choices are influenced by income, family size, age, lifestyles, and other factors and can change during a person's lifetime. A wide variety of housing types are needed within a community to serve the varied needs of residents.

It is intended that higher intensity residential development locate within mixed-use centers and in concentrations along some major transportation corridors in areas of similar character and intensity.

Density within most predominately single-family neighborhoods will stay at or near existing levels. Density may increase slightly in some neighborhoods as a result of infill development and the development of accessory unit housing. Densities will be higher in medium and high intensity areas than those found in low intensity residential areas.

As used in this document, density is the number of dwelling units per acre, less allowances for street and public and quasi-public uses (dwelling units/net acre). The percentage of land needed for streets and other uses varies in different locations of the city depending on the amount of vacant land, the number and width of streets, and the existing development pattern. Tacoma has many unique neighborhoods. The identity of these neighborhoods has been established through the recognition of landmarks and special or community features located in the neighborhood. The character of the neighborhoods can be further enhanced and enriched through the emphasis of these elements. The use of design elements such as signs, landscaping, special paving and public spaces can all help to reinforce the uniqueness of a neighborhood.

It is intended that the viability of residential areas will be strengthened by eliminating incompatible land uses, protecting natural physical features, promoting quality design and encouraging repair and rehabilitation of existing residential structures. Adequate streets and public facilities are also important to meet the needs of the citizens living in residential areas. The viability of the city's urban residential areas is essential if they are to continue to provide an acceptable alternative to suburban living.

To provide further protection of single-family areas, design guidelines for multiple-family developments are to be used in conjunction with adopted policies when considering applications for multiple-family development. The design guidelines are intended to mitigate potential impacts and to insure compatibility with the character of surrounding neighborhoods.

LU-RDG-1 Protect Established Residential Areas

Protect, preserve and maintain established residential neighborhood areas where a definite density, housing type and character prevail; nuisances and incompatible land uses should not be allowed to penetrate these areas.

Comment: *Northshore Country Club Estates* is an established residential neighborhood with predominantly single-family homes and a variety of lot sizes ranging from 5,000 to over 12,000 square feet. Additionally, there are multi-family rental and ownership housing units. As previously discussed in LU-UAD-1 Design and Aesthetics, the *Proposed Action* includes single-family attached and detached residential lots with average lot areas, lot widths, and setbacks that are smaller than the predominant development pattern. Additionally, townhouses would be introduced for the first time to this neighborhood. The DSEIS identified significant and adverse impacts to Land Use Compatibility and Aesthetics under the *Proposed Action*. The *Proposed Action* would be inconsistent with this policy. At this time insufficient design and detail are available to determine whether the *Proposed Action Alternative* would be consistent with this policy.

DSEIS **Section 3.1 Land Use Compatibility and Aesthetics** provides a detailed analysis of impacts by the *Proposed Action* on adjacent, existing residential uses, and identifies mitigation to reduce the impacts caused by the development on those uses. Further, the Transportation, Schools, and Recreation sections of the DSEIS identify proposed deficiencies to nearby public facilities that the Proponent will be required to mitigate to prevent adverse impacts on the surrounding neighborhoods.

LU-RDG-2 Prohibit Incompatible Land Uses

Prohibit incompatible land uses from situating within or adjacent to existing or future residential developments and gradually eliminate existing incompatible uses from existing residential areas.

Comment: Detached single-family homes and attached single-family homes (townhouses) are permitted uses within the “R-2 PRD” District. No other uses are proposed; therefore, this policy does not apply. However, as mentioned above, the scale and intensity of the proposed lot design may be incompatible with some areas of the surrounding neighborhoods.

LU-RDG-3 Stress Natural Qualities

Stress the natural physical qualities of our city (for example, trees, marine view and natural features) in locating and developing residential areas, provided such development can be built without adversely impacting the natural areas.

Comment: The *Proposed Development* will replace the majority of the existing trees, open space, and recreation features currently provided by the North Shore Golf Course with houses, streets, and new open space tracts. Existing marine, scenic, and territorial views have been reviewed under the DSEIS to determine the extent of view impacts to the surrounding area from both private and public locations. Some views will be impacted by the *Proposed Development*. While the golf course is a constructed recreational feature, this feature and associated mature plantings, provide a unique and desirable community asset and natural feature opportunity. To this end, the majority of residences surrounding the golf course were constructed not only after the golf course was built, but the golf course was highlighted as a key asset of the overall intended planned community development. Further, this planned community was designed and constructed to provide the most advantageous views of the numerous natural features of the land, including the territorial views of the golf course and its open space, as well as the City’s other desirable natural features such as scenic views of Mount Rainier and other unique and desirable Pacific Northwest characteristics. The development of the golf course under the Proposed Action will significantly reduce these desirable natural physical qualities. Staff concludes that the *Proposed Development* is inconsistent with this policy.

LU-RDG-4 Housing Opportunities

Encourage the development of residential areas that offer a variety of housing opportunities for all segments of the population within all areas of the city.

Comment: The proposed project is consistent with this policy. The Proponent indicates that the *Proposed Development* would provide 366 units of high income housing and 494 units of middle income housing. Townhouses proposed at *The Point at Northshore* would increase housing opportunities for Northeast Tacoma residents.

LU-RDG-5 Large Scale Residential Developments

Encourage development techniques for large scale residential developments that make better use of the land, allow a mix of housing types, provide for efficient service delivery, promote design flexibility, and preserve open space.

Comment: The proposed project is mostly consistent with this policy. The *Proposed Action* combines several types of housing and associated infrastructure, while providing open space. It has not yet been determined whether the amount of open space provided is adequate.

As a result of impacts analysis conducted during development of the DSEIS, a *Proposed Action Alternative* was conceptualized, which preserves additional open space at the perimeter of *The Point at Northshore* to provide a transition zone between the *Proposed Development* and the existing neighborhoods. The transition zone also provides a more efficient use of open space by adding a trail system that surrounds the development. The *Proposed Action* includes a variety of housing types. Impacts to public service delivery were analyzed in the DSEIS and when necessary, mitigation was required.

LU-RDG-6 Innovative Development

Encourage residential development of mixed structural type and design, as well as unique building and site arrangements to increase affordable housing options and achieve appropriate densities provided that the development is compatible and the desirable characteristics of the surrounding area are maintained.

Comment: The Proponent submitted schematics and/or photos for approximately 15 proposed housing elevations, both attached and detached single-family types. Further, the Proponent has indicated that site layout and design will allow for existing residences to maintain views of proposed amenities, such as pocket parks, trails, and water features to be maintained from existing surrounding homes. However, the *Proposed Development* may not be compatible and may not maintain the desirable characteristics of the surrounding area.

During the comment period, several hundred nearby residences stated that the existing golf course would be a more desirable neighborhood characteristic than the development of 860 new homes and associated infrastructure and open space.

Staff was unable to conclude whether the *Proposed Development* meets this policy.

LU-RDG-7 Encourage Maintenance and Revitalization of Neighborhoods

Encourage the preservation and/or maintenance of sound, viable neighborhoods and the revitalization of those that are declining.

Comment: The existing *Northshore Country Club Estates* homes (Divisions 2, 3 and 4) have been constructed surrounding the North Shore Golf Course since the early 1980s. The Proponent now proposes to redevelop the golf course into a residential neighborhood with 860 residential units. Aesthetic impacts to the surrounding neighborhood have been evaluated within the DSEIS. The *Proposed Development* may not be consistent with this policy.

LU-RDG-9 Rehabilitation and Renewal Efforts

Encourage and assist deteriorating residential areas in rehabilitation and renewal efforts in order to improve their quality and promote a sound, healthful and safe living environment.

Comment: The residential areas surrounding the North Shore Golf Course are not in decline; therefore this policy does not apply.

Many residents surrounding the golf course have stated in comment letters that the removal of the golf course would lead to deterioration of the existing residential area by impacting adjacent home values, views, and sense of open space and separation.

LU-RDG-11 Residential Development and Adequate Services

New or expanded residential developments should be located where there are adequate streets, utilities, and services necessary to support the development; these facilities and services must exist prior to or be developed concurrently with the intended development.

Comment: See comments for LU-GGD-4 and LU-GGD-8 above. With mitigation the *Proposed Development* will be consistent with this policy.

LU-RDG-12 Adequate and Safe Circulation Facilities

Require sufficient rights-of-way, street improvements, access control, circulation routes, off-street parking and safe bicycle paths and pedestrian walkways for residential developments.

Comment: With mitigation and conditions required by City staff, the development will be consistent with this policy. The City's Fire Department and the City's Traffic Engineer have provided comments and recommendations for compliance with the following codes: the building code; the City's *Design Manual*; *TMC* 13.06.510 Off-street parking and storage areas; and *TMC* Chapter 10.14 Driveways. A *Traffic Impact Analysis*, dated January 29, 2007 along with additional and supplemental documentation have been submitted and reviewed by the City's Traffic Engineer. Further, the DSEIS identifies necessary mitigation measures to address impacts to existing streets, intersections, proposed roads internal to the development, on- and off-street parking requirements, traffic calming requirements, and safe pedestrian accessways. This analysis and recommended mitigation are contained within **Section 3.3 Transportation**.

LU-RDG-13 Public Services and Facilities

Residential areas should have convenient access to public transportation, parks and open space, schools, and community facilities.

Comment: The *Proposed Action* is the construction of 860 units of housing and associated streets, open space, and infrastructure. Access of new residents to public transportation, parks and open space, schools, and community facilities was considered in the DSEIS. Where appropriate, mitigation has been required to ensure the future residential area will have convenient access to public services and facilities, and to ensure the development is consistent with this policy.

LU-RDG-17 Vegetation Planning

Encourage the selection and location of landscaping on public and private property that minimizes view blockage when planted and when fully grown.

Comment: See response to LU-UAD-2 above.
The View Analysis video and snapshots contained in the DSEIS demonstrate how the vegetation could potentially buffer views of the *Proposed Action* and *Proposed Action Alternative* from existing, surrounding development. With mitigation, the *Proposed Development* will be consistent with this policy.

LU-RDG-19 Neighbor Cooperation

Encourage neighboring property owners to work together to preserve individual property views.

Comment: Analysis of view impacts of the *Proposed Action* and the *Proposed Action Alternative* has been carried out by City staff with minimal assistance from the Proponent; therefore this policy may not have been met. The DSEIS contains a detailed analysis of the impact to individual property views resulting from all development alternatives.

- o Low Intensity (pp. LU-23 – LU-24)

Intent - Low intensity residential development is the most prevalent type of development in the city. The predominance of single-family detached houses on individual lots and a relatively quiet neighborhood environment are characteristic of low intensity residential areas. Low intensity residential areas include areas developed exclusively as single-family housing as well as areas developed with a limited mixture of other uses but still predominantly single-family in character. Large scale residential development projects which maintain a low density but permit varying types of structures such as low-scale apartments, townhouses, duplexes and single-family detached housing may be appropriate in low intensity areas.

Major portions of low intensity residential areas have been further designated as Single-Family Detached Housing Areas. These areas are identified on the *Generalized Land Use Plan Map*. A specific intent and policies that severely limit the kind of development that can take place within designated single-family detached housing areas is included on the following pages.

Within the remaining low intensity areas, some duplexes and triplexes may be present in appropriate locations. Planned residential districts of compatible low densities and limited, low density garden court apartments, small scale, neighborhood commercial establishments and community facilities may also be present.

Larger areas of mixed residential uses may accommodate new duplex development or the redevelopment of existing housing stock as duplexes, provided the character of the area is maintained and the physical limitations of the site are considered.

It is intended that the kind, number and scale of these other uses will be limited in order to protect the existing character of low intensity residential areas and also to allow for the continued development of single-family homes. These other uses, when permitted, will usually be located along arterial streets. It is recognized that the majority of land along arterial streets has already been developed as single-family detached housing and will remain as such. In certain instances, however, other uses (as mentioned above) may be appropriate along these arterials. It is recognized that duplex, triplex and small garden court apartment development along higher volume arterials may be appropriate and desirable; however such developments would need to be compatible with surrounding land uses and structures. These other uses will be subject to policies that insure they are properly located and compatible with the character of the surrounding neighborhood.

Overall densities for a low intensity residential area may vary and can range up to about fifteen dwelling units per gross acre. Density will vary depending on the nature and location of development, the physical limitations of the site, the existing development pattern, and the characteristics of the surrounding area.

Low intensity residential development may be appropriate in some instances on the City's steep slopes. Development on private steep slope properties is intended to be limited to very low-density, provided that maximum retention of open space is accomplished and soil stability maintained. A special intent discussion and policies are provided for the development of private steep slope properties.

Comment: The Northshore Country Club Estates PRD is designated in the *Comprehensive Plan* as “Low Intensity”, while Division 1, outside the PRD, is designated as “Low Intensity - Single-Family Detached Housing Area.”

Existing development along the perimeter of the golf course and the developments constructed within the golf course (such as Wind Dance, The Links, and On the Green), were permitted and constructed with the intent of the golf course providing significant open space and recreation to the immediate area (per the 1979 and 1981 Draft and Final EIS). While the *Proposed Action*, and the *Proposed Action Alternative* are consistent with the density standards of the “Low Intensity” designation, (i.e. 15 units per acre or less), the *Proposed Development* may be inconsistent with the intent of this designation. The intent of the “Low Intensity” speaks to ‘low-scale’ townhouses and single-family detached housing, along with compatible low densities in planned residential districts. As already noted, the existing residences were constructed in a manner to take advantage of the approximately 111-acre golf course and surrounding views. For example, On the Green apartments, Wind Dance, and The Links communities were clustered together, while the golf course surrounds the developments on two or three sides. Development of *The Point at Northshore* would completely remove the golf course; and though some tracts for open space and recreation will be provided, the overall scale of the 860-unit development is inconsistent with the established character and present scale of the existing

residences. The *Proposed Action Alternative* may also be inconsistent with the intent of the “Low Intensity” designation; however, this alternative lessens the impact to surrounding properties by including open space transition zones and a uniform trail system for active recreation.

LU-RDLI-1 Other Compatible Development

Allow other compatible development, provided the general character of the area is maintained and development standards are applied.

Comment: The *Proposed Development* site is located in the R-2 PRD zone. No development other than single-family (attached and detached) homes, trail system, pocket parks, and open space areas are proposed for the site at this time; therefore this policy does not apply. The “R-2 PRD” District does not permit commercial uses or multi-family residences.

LU-RDLI-6 Innovative Development

Permit the innovative development of large-scale low-density residential projects consisting of varied housing types in appropriate locations within low intensity residential areas provided the density; design and scale are compatible with the character of surrounding properties.

Comment: As mentioned above, the Proponent has provided multiple photographs and sketches of possible housing types that may be developed on the site. However, the Proponent has not committed formally to these designs, only that a variety of housing types will be built (single-family detached and townhouses of various sizes). The mix of single-family housing densities conforms to the intent of this policy; however in some areas, the development is not compatible with the character of surrounding properties; therefore, this policy has not been followed.

The *Propose Action Alternative* includes a unified perimeter trail running through the vegetated transition buffer, an innovative design feature that will improve the compatibility between proposed and existing developments.

Housing Element

- Neighborhood Quality (p. H-9)

Intent - The policy intent is to protect, preserve and enhance both single-family and multiple-family neighborhoods by supporting the characteristics that make these residential areas safe, healthy and livable as stated in the City's Strategic Plan. It is also generally assumed that established neighborhoods, especially single-family detached housing areas, will continue to increase their demands for protection from incompatible land uses or nuisances. Over the years, Neighborhood Councils have worked to address a myriad of needs ranging from the funding of small projects using innovative grants to funding of larger capital projects using a combination of public and private resources.

H-NQ-1 Neighborhood Investment

Provide neighborhood improvements and investment that considers the needs of individual neighborhoods including keeping areas crime free and aesthetically appealing for residents. Support the upgrading and maintenance of public infrastructure.

Comment: The Proponent has indicated that streets will have street trees and/or planting strips and a few areas with steep topography will be maintained with vegetation to help create a more aesthetically pleasing development. Some open space tracts throughout the development will also receive special landscaping features, and stormwater ponds could also provide an aesthetically appealing view. Further, the Proponent has proposed small pocket parks within the development and trails that they have indicated will be open and accessible to the public. The Proponent has not identified any design features specifically aimed at supporting a crime free environment; however, sidewalks and bike lanes will be provided on all main streets and special school zone signage will be installed along school walking routes (see DSEIS **Sections 3.3 Transportation** and **3.4 Schools**). New public infrastructure will be built throughout the development, and offsite improvements will be made to traffic infrastructure and sewer facilities. The *Proposed Development* will be consistent with this policy.

H-NQ-2 Neighborhood Infill Housing

Encourage infill housing that is compatible with abutting housing styles and with the character of the existing residential neighborhood. Focus housing within areas identified for residential growth and promote privacy from nearby units and public areas.

Comment: The *Proposed Action* includes infill housing that is in some areas comparable to existing development, and in other areas, is incompatible because it is more intense than existing development. Because of the different characteristics of abutting housing and *Proposed Development*, it is difficult to determine whether or not this policy is met by the *Proposed Development*. DSEIS **Section 3.1 Land Use Compatibility and Aesthetics** and FSEIS **Appendix D** give a detailed analysis of land use compatibility along the perimeter of the *Proposed Development* site. The transition zone in the

Proposed Action Alternative helps promote privacy from nearby units and public areas and improves land use compatibility.

H-NQ-3 Historic/Cultural Amenities

Identify, protect and enhance cultural, architectural, historic and scenic resources within residential areas. Support the rehabilitation of architecturally or historically significant homes as well as other landmark residential and mixed-use buildings while maintaining public safety and historic character.

Comment: This policy will be met by the *Proposed Development*. The golf course is located within the 1873 Puyallup Tribe of Indians Land Claims Settlement Survey Area; and therefore, the Proponent provided an *Archaeological Assessment*, dated January 19, 2007, prepared by Drayton Archaeological Research, LLC. The Assessment did not identify any cultural materials on the site. Further, the site is not located on, nor contains, any historic resources. The City’s Historic Preservation Officer has reviewed the *Assessment* and project and has no further comments. Further, the Puyallup Tribe of Indians have also reviewed the material and noted concerns over possible ancient burial grounds on the site. Should there be unanticipated discovery of an archaeological finding during construction the *Unanticipated Discovery Plan* shall be implemented immediately. However, significant ground disturbance has already taken place during initial construction of the golf course. Additional review of impacts to cultural resources may be required for projects under the jurisdiction of federal agencies under Section 106 of the *National Historic Preservation Act* (36 CFR 800).

Staff has identified scenic resources within and around the project area. A view study has been prepared and included in DSEIS **Section 3.1 Land Use and Aesthetic** analyzing potential impacts to scenic and territorial views.

- Housing Choice (pp. H-10 – H-11)

Intent - The policy intent is to promote a range of housing types that meet the diverse needs of all households in the city. While the general housing preference continues to be single-family detached homes, future residential development must take into consideration less available land as well as the demands of a population that includes students, aging “baby boomers”, low income and persons with special needs. Specifically, the City will encourage a mixture of housing types ranging from higher density apartments and condominiums located in or near major employment centers such as downtown to single family homes in neighborhoods.

One consequence of this changing population has been a gradual reduction in the average household size with more people living alone. Many “baby boomers” that are approaching retirement are starting to reduce the size of their housing increasing the demand for smaller housing units that are located near transit, parks, shopping and many other conveniences. It is important the City begins to address this changing demographic and provide a variety of housing options for the community.

The City supports the provision of innovative housing types that help reduce housing costs while increasing the supply of housing. This innovation can take many forms including:

“infill” housing, cottage housing, townhouses, zero lot line lots, “zipper” lots, accessory dwelling units (ADUs), conversion of nonresidential structures, Planned Residential Development (PRDs) as well as numerous variations in site, design and lot standards. It is also important that additional residential structures be compatible with overall density, intensity and character of established residential neighborhoods.

In particular, the use of ADUs is expected to become a significant option in the housing tool box. This type of housing is useful since it can address a number of needs such as (1) extra income for homeowners who wish to stay in their home; (2) housing for “mother-in-law” family situations; (3) added affordable housing and (4) a less visible accommodation of density.

The City also supports housing development that considers environmental factors such as critical areas (e.g. steep slopes, wetlands, gulches), minimizes the negative impacts on air, soil and water quality and considers factors as limited energy resources, “green” construction and sustainability in the design of new housing.

H-HC-1 Innovative Development Techniques

Promote innovative development techniques to better utilize land, promote design flexibility, preserve open space and natural features and conserve energy resources. Ensure new housing is compatible with the overall density, intensity and character of the area.

Comment: The Proponent has stated in **2.4 Project Objectives** (contained within the DSEIS), that an objective of their proposal is to “Implement innovative development techniques that allow a better use of the land, provide a better mix of housing types, and create efficient delivery of urban services, [and to promote] design flexibility that enhances and improves the use of and enjoyment of open space areas by the neighborhood and general public.” Further, the Proponent’s application materials, specifically the Variance and Rezone criteria, identify measures that will generally promote a community feeling and slower traffic, such as proposed landscaping, retention of several of the existing ponds, reduced development standards, and smaller roadways. The proposed landscaping and open space will assist in providing privacy for future residents.

A widely acceptable assumption is that attached housing is more efficient because this type of development uses less energy, usually allows for an opportunity to preserve open space and natural features, and usually provides a more efficient use of land. However, in this instance, staff finds that the townhouse portion of the proposal does not allow for notable amount of open space, nor does it afford the significant preservation of natural features, such as mature trees and shrubs and varying topography.

Therefore, staff concludes that the *Proposed Action* does not meet this policy. However, in staff’s view, the *Proposed Action Alternative* moves the project closer to meeting the intent of this policy than the *Proposed Action*.

Capital Facilities Element

Intent - It is the intent of the City to provide adequate public facilities and services, as efficiently and cost-effective as possible, to serve both existing and new development. Such facilities and services will be designed to meet the capital facility needs of the community and to support Tacoma's land use growth and development concept. In situations where the public facility is not owned directly by the City, the City will encourage the provision of adequate services and coordinate with the responsible agency.

Currently, there are twenty-three (23) types of facilities and services that the City provides or coordinates with other service providers to provide. Thirteen (13) of them are referred to as “public facilities” in the Growth Management Act and the County-wide Planning Policies, and are subject to the requirement of the City’s concurrency management ordinance (TMC 13.16). They are roads, transit, potable water, electric utilities, sanitary sewer, solid waste, stormwater management, law enforcement, fire, emergency medical service, schools, parks and libraries. The other ten (10) are not subject to concurrency because their needs are not as directly related to existing population or growth in the city. These facilities include the airport, railway, port facilities, municipal buildings, municipal parking facilities, convention facilities, public assembly buildings, telecommunications, economic and community improvement, and community and human service.

The level of service (LOS) standards for all the above facilities are shown in the following tables. For facilities subject to concurrency, LOS standards are used to determine the need for such facilities, test the adequacy of such facilities to serve *Proposed Development* concurrent with the impacts of the development, and ensure that appropriate levels of capital resources are allocated. For facilities not subject to concurrency, LOS standards are helpful as a management tool.

Capital Facilities (Subject to Concurrency)	Level of Service Standard
Electric Utilities	Voltage level + or - 5%; Average annual system outage duration 75 minutes or less
Emergency Medical Services (EMS)	.000016 units per capita
Fire	.000109 apparatus per capita
Law Enforcement	.288580 square feet per capita
Library	.06 square feet per circulation
Parks <ul style="list-style-type: none"> • Local • Regional • Open Space/Wildlife Habitat 	<ul style="list-style-type: none"> • .003 acres per capita • .007 acres per capita • .002 acres per capita
Roads <ul style="list-style-type: none"> • Arterial Corridors • Port Area Arterials & All Other Arterials 	<ul style="list-style-type: none"> • 85% arterial lane miles LOS “E” (.99 or better volume to capacity ratio) • 85% arterial lane miles LOS “D” (.89 or better volume to capacity ratio)
Sanitary Sewers <ul style="list-style-type: none"> • Maximum Month Flow • Peak Hydraulic or Peak Instantaneous Flow 	<ul style="list-style-type: none"> • 200 gallons per capita per day (GPCD) • 400 gallons per capita per day (GPCD)
Schools <ul style="list-style-type: none"> • Elementary (K-5th grade) • Middle (6th grade) • Middle (7th-8th grade) • High (9th grade) • High (10th-12th grade) 	<ul style="list-style-type: none"> • 90 square feet per student • 90 square feet per student • 110 square feet per student • 110 square feet per student • 130 square feet per student

Capital Facilities (Subject to Concurrency)	Level of Service Standard
Solid Waste	1.13 tons per capita per year
Storm Water Management <ul style="list-style-type: none"> • Drains < 24" • Drains > 24" 	<ul style="list-style-type: none"> • 10 year, 24 hour design storm • 25 year, 24 hour design storm
Transit <ul style="list-style-type: none"> • Auto Park & Ride Stalls • Fixed Route Vehicles • Shuttle Vehicles • Vanpool Vehicles • Transit Center Bays 	<i>(Per capita)</i> <ul style="list-style-type: none"> • .00387 • .0003132 • .0001325 • .0001704 • .0001233
Water (Potable)	562 gallons per day per Equivalent Residential Unit (ERU)

Capital Facilities (NOT subject to Concurrency)	Level of Service Standard
Airport	100% of FAA requirement; 230,000 take-offs and landings
Economic and Community Improvement	As needed
Municipal Buildings <ul style="list-style-type: none"> • City Government • Community and Human Service 	<ul style="list-style-type: none"> • .88 square feet per capita • As needed
Municipal Parking Facilities	As needed
Municipal Railway (<i>Tacoma Rail</i>)	1.07 track feet per car (<i>staging yard</i>)
Port Terminal and Yard Facilities	4,200 twenty foot equivalent unit containers per acre
Public Assembly Buildings <ul style="list-style-type: none"> • Exhibition and Convention • Theaters, Arenas and Stadiums 	<ul style="list-style-type: none"> • .988827 square feet per capita • .180477 seats per capita
Telecommunications (<i>Click! Network</i>)	As needed

CF-APFS-1 Public Facilities

Maintain level of service standards for each type of public facility and provide capital improvements needed to achieve and maintain the standards for existing and future populations.

Comment: As noted above, the City of Tacoma maintains level of service (LOS) standards for each type of public facility. Mitigation measures will be required to assure that capital improvements needed to maintain the levels of service are made concurrent with development. This policy is not specific to this development, but is meant as a City-wide planning policy. Current City practices conform to this policy.

CF-APFS-2 Concurrency

Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy or use, or within a reasonable time as approved by the City, without decreasing current service levels below locally established minimum standards.

Comment: The application has been transmitted to local governmental and non-governmental agencies for review and comment. The recommended conditions and/or mitigation outlined for each necessary public facility or service has been included in the DSEIS with recommended mitigation measures, or will be included in the staff report presented to the Hearing Examiner with recommended development conditions. Those mitigations/conditions have been identified to ensure that the development will not decrease the current service levels below the locally established minimum standards. Per the *Tacoma Municipal Code*, verification that the Proponent has adequately completed the required improvements/facilities/services would occur at the time of Final Plat. Therefore, adequate public facilities will be required concurrent with development; therefore this policy will be met.

CF-APFS-3 Level of Service

No development shall be approved which would result in a reduction in the adopted level of service standard for any needed public facility or service.

Comment: As indicated above, local governmental and non-governmental agencies and organizations have reviewed the *Proposed Action*, and identified deficiencies in facilities and services. Mitigation will be required so that adequate public facilities are provided with this development and to ensure that the development conforms to this policy.

CF-APFS-5 Growth Concept and Tiers

Provide facilities and services that are consistent with and support the growth and development concept and the designation of growth tiers.

Comment: If properly mitigated, the application could provide facilities and services that are consistent with and support the *Comprehensive Plan's* Growth Strategy and Development Concept Element and the project site's designated growth Tiers of Tier I, Tier II, and Tier 3CR.

Environmental Policy Element

- General Policies (pp. E-4 - E-7)

Environmental – Natural Features

Intent - The city's unique natural features are a visual and aesthetic asset to the community. Lakes, streams, slopes, and gulches are highly valued for their aesthetic quality and recreational opportunities. These natural features also provide valuable ecological functions as well. Therefore, growth and development should be in harmony with the environment in order to prudently protect these features for the benefit of as many citizens as possible.

E-ENF-1 Natural Features Value

Recognize the value of natural features of the land within the urban environment; conserve as many natural features as is possible and appropriate. Natural features are not only

important for ecological reasons but they both possess educational and recreational values as well.

Comment: This application proposes to substantially alter the existing natural features of the project site area. The existing site currently contains an 18-hole privately-owned public golf course. The golf course and surrounding residential properties contain large, mature deciduous and non-deciduous trees, detention ponds/water features, steep grades that at times exceed 40% and the headwaters for Joe's Creek. While the Proponent may assert that the site no longer contains "natural" features (due to the grading and stormwater control facilities created with the development of the golf course), staff contends that the landscaping, ponds, and topography are perceived as natural, as such elements have been showcased as part of the natural amenities for the surrounding residential communities. For example, the steep slopes create opportunities for scenic and territorial views of the existing open space (i.e., the existing golf course), Commencement Bay, and Mount Rainier. Along the same lines, the ponds and mature trees located within and at the edges of the golf course open space create a visually pleasing environment, support urban wildlife, and create a visual break from the surrounding residential neighborhoods.

While this application proposes to retain the four largest of the existing seven ponds and some landscaping, this *Proposed Action* will considerably alter the existing topography by grading and filling the project site, removing the majority of trees and vegetation, and developing the golf course with 860 residential units. The current proposal cannot be built without the approval of several variance and development waiver requests. As such, Proponent has not demonstrated that this proposal will be consistent with this policy, which strives to conserve as many natural features as is possible and appropriate.

E-ENF-2 Preservation of Natural Resources

Preserve through programs of acquisition, easement, design standards and zoning an optimum amount of the City's desirable natural features for public purposes. Included would be steep slope areas, water frontage, wooded areas, aquatic lands and other unique and significant natural areas.

Comment: As noted above, this application proposes to retain the four largest of the existing seven ponds and some perimeter landscaping. However, the only public use elements proposed for this application is a 1.7 acre central park, several pocket parks, and the proposed trail system. The Proponent states that the trail system creates a north-south pedestrian path through the project site. However, it appears that this trail system is made up of a series of sidewalks and trails throughout the development— not one uniform, uninterrupted trail system.

Almost all of the existing wooded areas will be removed and replaced with limited amounts of vegetation; a substantial amount of grading and filling will flatten the site's existing rolling hills; the trail system consists of a series disconnected concrete sidewalk and trails; the

ponds that are retained are required for on-site storm detention and already exist; therefore, staff finds that this application does not exemplify a good faith effort to preserve desirable natural features for public purposes.

E-ENF-3 Environmental Considerations

Emphasize careful planning in growth and development activities in order that the City's natural features may be preserved, soil stability maintained and renewable and non-renewable resources protected.

Comment: As noted earlier, this proposal does not seek to adequately preserve the site's natural features and protect the site's existing renewable and non-renewable resources (i.e., mature trees, scenic and territorial views, and recreation component); therefore, it is not consistent with this policy.

A geotechnical analysis has been submitted with the application; and if the preliminary plat is approved by the City, the City's geotechnical engineer will review the Final Plat and associated development permits for retaining walls, grading/filling, and overall maintenance of soil stability for the development site.

Growth and Development

Intent - The city will continue to be the focal point of growth for the greater Tacoma area and a growth center for the region and the state. It is intended that growth and development occur in an orderly and desirable manner in accordance with citizen needs and desires, the physical characteristics of the land.

E-GD-1 Site Planning

Encourage site planning and construction techniques that maintain natural landforms, retain native vegetation, and preserve open space.

Comment: Based on the previously noted policy analysis, the Proponent has not demonstrated to staff's satisfaction that its site planning and construction techniques conform to this policy by maintaining the site's natural landforms, retaining native vegetation, and preserving open space.

E-GD-2 Development Hazards

Discourage development on lands where such development would pose hazards to life or property, or where important ecological functions or environmental quality would be adversely affected: (a) floodways of 100-year floodplains, (b) erosion hazard areas, (c) landslide hazards areas, (d) unique or significant wetlands or stream corridors, (e) fish and wildlife conservation areas and (f) seismic hazard areas.

Comment: The Proponent proposes to avoid Joe's Creek, its associated buffer, and two other identified wetlands and their associated buffers. A Wetland/Stream Assessment Permit has been submitted and will be reviewed to verify that Joe's Creek, the wetlands, and associated buffers will not be impacted by this proposal. Further, the Proponent contends that it will manage the project's stormwater runoff so as not to increase Joe's Creek's buffer to the extent of the 100-year

floodplain as provided for by *TMC 13.11 Critical Areas Preservation Ordinance* and the City of Tacoma *2003 Surface Management Manual*. (see Technical Memoranda from the City's SES, Structural Engineer, and Environmental Services Engineering Division). Therefore, with necessary mitigation, the development will conform to this policy.

E-GD-4 Educational/Aesthetic Appearance

Encourage regulations or development limitations within areas of recognized educational, anthropological, historical, biological or aesthetic significance to avoid irreversible damage to such areas.

Comment: The City strives to avoid irreversible damage to areas recognized for their educational, anthropological, historical, biological, or aesthetic significance through enforcement of its *Critical Areas Preservation Ordinance (TMC 13.11)*, the *1988 Puyallup Tribal Agreement*, and the *Landmarks and Historic Special Review Districts Ordinance (TMC 13.07)*.

Whereas the golf course is a privately owned property, it does have an aesthetic significance to the surrounding communities. The immediately adjacent neighborhoods were constructed specifically around the golf course to take advantage of views of the course. The original EIS for the PRD (dated January 1981) provides an analysis of the PRD and that the golf course was an intricate piece/design of the development.

The *Proposed Action* will be required to comply with all City standards, including those listed above. There is no City standard or policy specifically establishing the aesthetic value of the North Shore Golf Course, but the golf course does have local significance to homeowners enjoying views and/or direct access to the facility. As mentioned above, the majority of residences surrounding the golf course were constructed not only after the golf course was built, but the golf course was highlighted as a key asset to the development. The golf course was also considered as an important open space feature in the 1981 *Northshore Country Club Estates EIS*. Although the *Proposed Action* will be mostly consistent with this policy through enforcement of the above-mentioned City ordinances and policies, the North Shore Golf Course holds local aesthetic significance; therefore redevelopment of the golf course would be inconsistent with this policy.

Recreation and Open Space

Intent - Recreation and open space facilities including playgrounds, parks, public school sites, open space corridors, public golf courses, scenic or historic routes, bikeways, trails and conservation areas.

Comment: In 2008, the City adopted policies for a new *Open Space Plan*, which recognizes the need for comprehensive and proactive management of publicly and privately owned open space within the City. Currently, the City is working on a management program to implement the Open Space policies. While the application for *The Point at Northshore* was deemed complete prior to the adoption of the *Open Space Plan* policies, the City suggests that the Proponent may wish to improve its application by reviewing the newly adopted Open Space policies and using them as guidance on innovative ways of working with the City and other public agencies to create desirable open space for view corridors, retaining wooded areas and preserving existing topography.

E-ROS-1 Usurping of Open Space

Discourage the use of designated open space for non-open space uses. Such utilization of open space land should not be permitted unless land and facilities of like character and equal value are provided.

Comment: In 1981, the Hearing Examiner's recommendation to approve the PRD rezone contained a condition that the PRD Proponent enter into an agreement with the golf course owners that includes the use of the golf course for open space and density, in perpetuity, for the overall PRD development. However, through the request to modify the original PRD rezone request, the Proponent for *The Point at Northshore* is now seeking to modify/remove this condition, and to provide instead a public easement over all parks and trails as well as dedicated streets for public use within the plat.

As described earlier, the application proposes several small tracts for neighborhood pocket parks, and one larger tract for a 1.7 acre park. The four detention ponds created or retained through this application will also be held in common-ownership tracts.

The new open space proposed would include land uses and facilities of unequal character and value to a golf course; therefore the *Proposed Action* is inconsistent with this policy.

E-ROS-3 Desirable Open Spaces

Preserve and maintain through easement, acquisition or other appropriate means, desired open space areas such as steep slopes, scenic view areas, water frontage, wooded areas, unique natural features, and historic areas taking care to provide a proper balance between retaining these areas and private development.

Comment: As described earlier, the *Proposed Action* involves redevelopment of an existing golf course, which also contains some view corridors. New open space is proposed at *The Point at Northshore* in the form of several small tracts for neighborhood pocket

parks, and one larger tract for a 1.7 acre park. The four detention ponds proposed for construction or retention under this application will also be held in common-ownership tracts. Although the *Proposed Action* may convert open space in a manner inconsistent with this policy, the *Proposed Action Alternative* represents a development scheme that would provide more balance between retaining open areas and allowing private development that is more consistent with this policy.

E-ROS-4 Open Space Uses

In recognition of their ecological, conservational, recreational and educational values, preserve and maintain open spaces for bird and small animal habitats, green areas in urbanized neighborhoods, green separations between dissimilar land use districts, and aesthetic purposes.

Comment: As previously noted, the Proponent is proposing that the development contain a 1.7 acre park, several pocket parks, open space tracts, an interrupted trail system, and tracts for steep slopes. The *Proposed Action Alternative* does provide for a more uniform and uninterrupted trail system, which would retain many of the existing mature trees along the site's perimeter, as well as also providing the proposed parks and tracts. The *Proposed Action Alternative* would further achieve the green separation between the existing and *Proposed Development*, further reducing the aesthetic impact on surrounding residences, and provide additional habitat for birds and small animals. Staff concludes that the *Proposed Action Alternative* would be more consistent with this policy than the *Proposed Action*.

E-ROS-5 Private Open Space

Encourage the retention or preservation of private open space through such programs as the Open Space Current Use Assessment Program.

Comment: In 1981, the Hearing Examiner's recommendation to approve the PRD rezone contained a condition that the PRD Proponent enter into an agreement with the golf course owners that includes the use of the golf course for open space and density, in perpetuity, for the overall PRD development. However, through the request to modify the original PRD rezone request, the Proponent is now seeking to modify/remove this condition.

As part of *The Point at Northshore* development, the Proponent is proposing to provide an easement over all parks and trails, as well as dedicated streets, to the public for use. Therefore, if the Hearing Examiner approves this development, the easements over the private open space tracts would be consistent with this policy; however, it is noted that significantly less open space would be provided than what currently exists at the site.

Air Pollution

E-AQ-1 Air Pollution

Support the control and ultimate elimination of the contaminating by-products of transportation equipment.

Comment: The City has not yet set standards to regulate air emissions related to automobile traffic; however the City has estimated what the impact to air pollution the *Proposed Action* will have, see FSEIS **Section 2.3.7 Global Climate Change**. Upon completion, it is estimated that the *Proposed Action* would add 5,330 daily weekday trips. In order to reduce the need for additional vehicle trips within *The Point at Northshore*, the City will require a fully connected pedestrian and bike trail throughout the development. Additionally, onsite recreation opportunities will be dispersed throughout the development so they may be reached without the use of a car.

Energy

E-E-1 Locate and Design for Energy Efficiencies:

Encourage building design, orientation and land use arrangements that take advantage of natural landforms, existing vegetation, and climatic features for the purpose of reducing energy demands for heating and cooling purposes.

Comment: Construction of *The Point at Northshore* will be required to comply with the City's adopted Energy Code and Building Code requirements. These adopted standards for energy efficient construction practices are consistent with *Comprehensive Plan* Policy E-E-1.

Scenic Areas

Intent - Urban aesthetics and design encompasses all aspects of the physical and natural environment of a city. Quality design, historic preservation, and preservation of natural areas can give citizens a sense of time and place within their environment and pride in their community.

E-SA-1 Scenic Sites and Vistas

Develop and maintain a system of scenic view sites and vistas in order to take advantage of the natural beauty of Tacoma and its siting in the Puget Sound Region.

Comment: Consistent with this policy, the City of Tacoma has developed a View-Sensitive Zoning Overlay District to protect areas with special scenic view sites (see *Tacoma Municipal Code* 13.06.555). The development site is not located in this View-Sensitive District. Still, the City recognizes that views of the North Shore Golf Course are a locally-significant amenity and were an integral part of the original 1981 Northshore Country Club Estates PRD approval. See DSEIS **Section 3.1 Land Use Compatibility and Aesthetics** for an analysis of territorial and scenic impacts to existing residences resulting from the *Proposed Development*.

E-SA-2 Tree Trimming

Permit the trimming or removal of trees or vegetation from natural open space areas only if it can be accomplished in accordance with the Critical Areas Preservation Ordinance or established regulations for view preservation or if it can be proven that the trees or vegetation are a detriment to the ecology or aesthetic appearance of the area or that they present an unsafe condition.

Comment: The redevelopment of the North Shore Golf Course would involve removal of trees in natural open space areas, as well as removal of vegetation in redeveloped open space areas (i.e. golf course fairways). Per the Proponent's proposal, no tree trimming or vegetation removal is proposed within the designated critical areas, or their associated buffers. The Proponent's application materials indicate that some existing trees would be maintained on the site; however, after careful review of the *Proposed Development* and grading, it appears that most trees will need to be removed.

Consistent with this policy, in its review of *The Point at Northshore* the City will enforce the *Critical Areas Preservation Ordinance*. Additionally, the City has undertaken extensive analysis of view impacts of the *Proposed Action* and has prepared a *Proposed Action Alternative* that would provide buffers along the entire perimeter of the development and retain, where possible, existing mature trees. Retention of these trees would help maintain the aesthetic appearance of the area.

E-SA-3 View Corridors

View corridors which can link the City and the water should be preserved or created.

Comment: Limited views of the water exist from the neighborhood adjacent to the southeast corner of the golf course (generally Pinehurst Drive). It is not anticipated that these views would be impacted from the development; therefore, the *Proposed Action* is consistent with this policy.

E-SA-4 Promote Steep Slope Views

Recognize, protect and promote the visual qualities and the view potential offered by steep slope areas.

Comment: Consistent with this policy, in its review of *The Point at Northshore*, the City considered impacts to views from steep slope areas. Presently, the existing golf course sits at a lower elevation than many of the adjacent residence; thus, adjacent residences have views of the golf course. According to the Proponent's proposal, in the course of redevelopment, the golf course site will be filled in many locations in order to build housing lots, and streets and necessary infrastructure. Therefore, the elevation difference between existing and proposed homes will be reduced, and the view of the golf course will no longer exist. The view analysis contained within the DSEIS and FSEIS (see DSEIS **Section 3.1 Land Use Compatibility and Aesthetics** and FSEIS **Appendix D Land Use Affected Environment and Impact**

Analysis) provides visual depictions of how the views from homes, sitting on steeper slopes, would be impacted.

E-SA-5 Preservation Large Trees/ Existing Views

Preserve, wherever and whenever feasible, large existing trees within residential neighborhoods and select and locate new trees to preserve existing views.

Comment: The Proponent's application materials indicate that some existing trees would be maintained on the site; however, after careful review of the *Proposed Development* and grading, it appears that most trees will need to be removed. Staff believes it is feasible to retain some large existing trees within the *Proposed Development* site; and has proposed retaining existing vegetation in some areas in the *Proposed Action Alternative*. This alternative includes open space transition areas that would provide buffers along the entire perimeter of the development and retain, where possible, existing mature trees. Retention of these trees would help maintain the aesthetic appearance of the area; and therefore, the *Proposed Action Alternative* would be consistent with this policy.

E-SA-6 Design and Aesthetics

Emphasize good design and aesthetics with respect to scale, proportion and the use of compatible materials in new development and redevelopment within the City.

Comment: See comments for LU-UAD-1 above. The *Proposed Development* would be inconsistent with this policy; however the *Proposed Action Alternative* addresses some design issues that could lead to consistency with this policy.

E-SA-7 Encourage Private Covenants

Encourage the establishment of private covenants to control height and vegetation in new plats to promote view preservation.

Comment: If the proposal is permitted, in order to be consistent with this policy the Proponent will need to develop private covenants for the maintenance and use of the commonly owned tracts for parks, stormwater, open space, trails, steep slopes, etc. It is not anticipated that any homes within the *Proposed Development* will have scenic views to protect due to the property's topography.

E-SA-9 Vegetation Planning

Encourage the selection and location of landscaping on public and private property that minimizes view blockage when planted and when fully grown.

Comment: The City does not presently regulate the height of vegetation to protect views; however the City encourages the Proponent to add protective provisions within their private covenants to control vegetation within the commonly owned spaces. Under the *Proposed Action Alternative*, it is recommended that many of the existing mature trees be retained within the open space transition areas. Those trees may already impact some views from existing residences surrounding the golf course. This policy is not project-specific, so no determination of consistency is possible.

E-SA-10 Vegetation Control

In limited instances, where appropriate, and after City approval, permit private individuals to provide for the trimming, thinning or removal of vegetation on public property where views are obstructed or other circumstances may warrant.

Comment: Property owners seeking removal or trimming of vegetation within publicly owned property will be evaluated by the City of Tacoma. This policy is not project-specific, so no determination of consistency is possible.

E-SA-11 Neighbor Cooperation

Encourage neighboring property owners to work together to preserve individual property views.

Comment: The City is unaware of the Proponent working with the existing adjacent private property owners to preserve views as part of the *Proposed Development of The Point at Northshore*. This policy is not project-specific, so no determination of consistency is possible.

Recreation and Open Space Facilities Element

Public Recreation and Open Space Standards

Public recreation and open space facilities in Tacoma are owned and/or operated by Metro Parks Tacoma, the Tacoma School District, or the City of Tacoma. Existing facilities include parks, playgrounds, improved school sites, trails, bikeways, gulches, steep slopes, waterfront and other areas. Categories of public recreation and open space facilities considered in this *Recreation and Open Space Facilities (ROSF) Element* are described below. Due to the wide variety of uses at some sites, it is impossible to fit all sites into a specific category, and some sites may fit into more than one category.

Regional Parks

Regional parks are facilities that provide regional attractions such as a zoo, aquarium, arboretum, waterfront parks, special use areas, or other distinctive features. Other elements may included: paths, picnic areas, restrooms, concessions, environmental education, educational exhibits, landscaping, gardens, amphitheater, hard surface play area, play equipment, athletic complexes, stables, golf courses, day camps, overnight camping, natural areas, native plantings, wildlife areas and waterfront access.

Minimum Standard:	varies
Population Size:	.007 acres per capita
Service Radius:	30+ minutes driving time

Development Concept (ROS – 9)

The concept is to locate, acquire, develop, and improve a good distribution of both neighborhood and citywide recreation and open space areas, which provide for a variety of recreation opportunities and are easily accessible. [...] A variety of facilities and programs will be needed to accommodate youth, families, seniors, and employees, including those whose ability to travel may be limited, such as seniors, children, and the disabled.

- General Recreation and Open Space (pp. ROS-10 – ROS-11)

Intent - It is important to recognize the unique attributes of Tacoma's location in the Pacific Northwest, the Puget Sound region, and on Commencement Bay in the provision and improvement of recreation and open space facilities. The City's diversity of natural settings offers many opportunities for a variety of recreation and open space areas, including parks, playgrounds, gulches, steep slopes, scenic view sites, historic areas, shoreline and wetland areas, and other natural open spaces.

It is intended that some of these sites may be fully developed while others may receive little or no development or may be left in a natural state. Development of sites and facilities should be accessible to all persons, and provide a wide variety of activities. The location of sites must also be considered in order to ensure that all areas of the City are equitably served by recreation facilities and services. It is intended that recreation and open space areas reflect sensitivity to conservation, aesthetics, natural resources and the environment while promoting efficiency and compatibility of uses. It is also intended that open space corridors be established to link these areas together as much as possible.

Existing revenue sources for improving recreation and open space areas may not be sufficient to meet the demand. Obtaining funds for recreation and open space acquisition, development, improvement and rehabilitation is necessary to maintain and enhance existing facilities.

ROS-G-1 Recreational Distribution

Design and locate appropriate recreational developments, facilities and services within areas demonstrating a need for such facilities and services taking care to serve all people fairly and equitably.

Comment: The City's analysis of recreation distribution in the DSEIS shows conformance with this policy. The *Proposed Development* will require the removal of an 18-hole golf course and the addition of 860 new households to the City. The impacts both onsite and offsite to parks and recreation facilities in the cities of Tacoma and Federal Way were analyzed in the DSEIS and mitigation has been recommended. The City will construct no public recreational facilities at the *Proposed Development* site; however privately-owned onsite recreation facilities as well as payment or construction of offsite recreation facilities by Metro Parks Tacoma has been requested as mitigation.

ROS-G-3 Design and Development

Promote design and development of recreation and open space facilities that provide for play that will enhance Tacoma's natural setting and that complement the ecology and unique features of the site or area.

Comment: See comment for ROS-G-1 above. The City has determined consistency with this policy if recommended mitigation be required.

ROS-G-4 Scenic Sites and Vistas

Develop and maintain a system of scenic view sites and vistas in order to take advantage of the natural beauty of Tacoma and its siting in the Puget Sound Region.

Comment: As with policy E-SA-1, the City has acted consistently with this policy by developing a View-Sensitive Zoning Overlay District to protect areas with special scenic view sites (see *Tacoma Municipal Code* 13.06.555). The development site is not located in this View-Sensitive District.

Still, the City recognizes that views of the North Shore Golf Course are a locally-significant amenity and were an integral part of the original 1981 Northshore Country Club Estates PRD approval. See DSEIS **Section 3.1 Land Use Compatibility and Aesthetics** for an analysis of territorial and scenic impacts to existing residences resulting from the *Proposed Development*. The *Proposed Action Alternative* identifies a lesser scale development that would incorporate open space transition zones to reduce impacts to existing scenic and territorial views from adjacent residences.

ROS-G-5 Preservation of Historic/Cultural and Scenic Resources

Preserve historic, cultural and scenic resources in the central business district, as well as throughout the city.

Comment: The City strives to avoid irreversible damage to areas recognized for their historical, cultural, and scenic value. The *Proposed Action* will be required to comply with all City of Tacoma ordinances and policies addressing historic/cultural and scenic resources, such as the *Critical Areas Preservation Ordinance (TMC 13.11)*, the *1888 Puyallup Tribal Agreement*, and the *Landmarks and Historic Special Review Districts Ordinance (TMC 13.07)*.

As previously noted, the site is not believed to contain historic or cultural resources per the Proponent's *Archeological Assessment*; therefore, this development will be consistent with portions of this policy pertaining to historic and cultural resources. As for protecting scenic resources, the City recognizes that views from existing homes will be impacted by the proposal (see **Section 3.1 Land Use Compatibility and Aesthetics**). The *Proposed Action Alternative* identifies a lesser scale development scenario that would incorporate open space transition zones to reduce impacts to existing scenic and territorial views from adjacent residences. The *Proposed Action Alternative* presents a development scenario that is more consistent with this policy than the *Proposed Action*.

ROS-G-6 Multiple Use

Encourage compatible, multiple use of open space and recreation facilities.

Comment: The Proponent's application indicates that open space, parks, and a trail system would be provided with the development and available for the public use. The *Proposed Action Alternative* contained within the DSEIS proposes a more complete and uninterrupted trail system for

active recreation within the development, which staff feels is more consistent with this policy than the *Proposed Action*.

The DSEIS specifically calls out a required amount of open space and recreational facilities to mitigate the impact of 860 new residences (see **Section 3.2 Recreation**).

ROS-G-7 Accessible Linkages

Encourage the development of pedestrian, bicycle or equestrian linkages wherever possible, appropriate within and between recreation, and open space sites.

Comment: As previously noted, the *Proponent Action* includes a north-south trail system that was comprised of a mix of public sidewalks and unimproved trails. Staff finds that this disjointed trail system does not provide an effective linkage for the site or serve as a cohesive recreation amenity, and is, therefore, inconsistent with this policy. On the other hand, the *Proposed Action Alternative* includes an uninterrupted trail system linking the entire site within the open space transition zones. Thus, the *Proposed Action Alternative* is more consistent with this policy.

Additionally, per the *Tacoma Municipal Code*, under any development scenario the Proponent will be required to provide a safe walking route for children who walk to school. DSEIS **Section 3.4 Schools** provides more specific details on locations of the route and how safe access will be provided.

Joint Use and Planning (pp. ROS-11 – ROS-12)

Intent - Inflation, tight budgets, increased service demands, and high costs of development, operation, and maintenance are making necessary "joint use" or "cooperative arrangements."

Joint planning has merit. Joint development may represent a cost savings. Joint use of recreation and open space facilities is essential. Joint operation and maintenance of facilities should be explored when feasible.

In 1944, the Park Board and School Board adopted a statement outlining cooperation so that resources of the two districts could be used to produce a "unified program of recreation for the City of Tacoma." In 1979, to reaffirm this commitment and joint-use principles, the Tacoma School District Board of Directors and the Metro Parks Tacoma Board of Commissioners adopted unanimously a formal "Joint Use Policy Agreement."

Private organizations and businesses can also contribute to the provision of recreation and open space facilities through donations, dedication of land, sponsorship of activities, and other means. The involvement of those outside of government can substantially reduce public expenditures and increase recreational opportunities. It is intended that cooperative use be employed whenever possible to increase public benefit.

ROS-JU-2 Private Sector

Encourage private citizens, businesses, organizations, and others to provide recreation and open space facilities for public purposes by the dedication of land, donations to programs, and sponsorship of activities whenever appropriate.

Comment: The City and the Proponent have acted consistent with this policy by ensuring that *The Point at Northshore* will include open space facilities for public purposes. The Proponent has indicated that all trails and parks within the *Proposed Action* will be open to the public for their use, though the open space tracts will be privately owned. Further, as previously noted, the Proponent had proposed a north-south trail system that was comprised of a mix of public sidewalk and unimproved trails. Staff finds that the proposed trail system does not adequately connect the site or provide a true recreational amenity, however; and therefore, in the *Proposed Action Alternative*, the City recommends that an uninterrupted trail system, surrounding the entire site should be provided within the open space transition zones (also required under the *Proposed Action Alternative*). See DSEIS **Section 3.2 Recreation** for a discussion of the proposed mix of open space tracts and park facilities in the *Proposed Action*, and additional required off-site recreation amenities identified by the City as recommended as mitigation.

Open Space Areas/Corridors (pp. ROS-12 – ROS-14)

Intent - The intent of the Growth Management Act recognizes the important value and function that open space plays in the overall growth of a community. The Act further states that each county and city identifies open space corridors and between urban growth areas. These lands should be useful for recreation, wildlife habitat, trails and connection of critical areas that are often linear in nature.

Although many areas of Tacoma are highly developed, certain sections remain as open space conservation areas. The majority of these areas are located in nature areas and along steep slopes. The size of an open space area can vary from several hundred acres at Point Defiance Park to a few hundred square feet of steep slope. Open space conservation areas provide continuous green belts of natural vegetation, act as buffers in highly urbanized areas, and are fish and wildlife habitat areas.

The primary open space conservation objectives are: 1) preservation of wildlife habitats; 2) preservation of visual and physical access to natural scenic areas; 3) protection of steep slope areas; and 4) restoration of degraded habitat areas, wetlands, and streams.

The intent is to preserve these areas as open space, wherever possible, recognizing that some development may occur on privately owned land. Public acquisition of desirable open space property is encouraged in order to ensure its retention as an undeveloped area; to ensure the survival of wildlife species; and to protect these areas from future landslides, dumping and filling.

Nature areas and steep slope areas can provide forms of recreation not generally found in other public lands, such as hiking and nature studies. Many of the most attractive parks of the area are located within steep slope areas, which are unusable for urban development. McKinley Park is an example of a park in a steep slope setting.

To date, little development has occurred within nature areas and steep slope areas due to the availability of more suitable building sites and the high costs of steep slope construction. However, as urbanization continues and land becomes scarce, pressures to develop these properties will increase. Despite the potential of many slope sites, a certain element of

hazard may exist if they are developed. While it is desirable to preserve nature areas and steep slopes as open space, it is recognized that a majority of these properties are privately owned and some low intensity development such as housing may occur.

Integrating nature areas and steep slope areas into a pedestrian/bikeway trail system, that links various points of interest in the city is very desirable. An example is the "Bayside Trails," a pedestrian trail, traverses partly through Garfield Gulch nature area and connects Pacific Avenue, Stadium Way, Division Avenue, Stadium High School, Schuster Parkway, Garfield Park and the Old Town Dock. Only a small portion of steep slope and nature areas has been preserved under public control. It is intended that additional properties be secured through acquisition or easement for trail development and conservation purposes.

Although considered wastelands by many, marshes, ponds and other wetlands are extremely important to the food chain; many species of both animal and plant life depends on this wet environment for existence. Birds and waterfowl choose these locations for nesting places. In addition, these wetland areas are important as ground water recharge areas and have tremendous flood control value.

ROS-AC-1 Open Space Values

Recognize the ecological, conservation, recreational, aesthetic, and educational values of open spaces.

Comment: Consistent with this policy, the City has considered the impacts of the *Proposed Action* on open space and recognizes the values of open space (see DSEIS **Section 3.2 Recreation**). Upon review of the proposal, staff recommended that the amount of open space, including recreational amenities, should be increased (see the *Proposed Action Alternative*) to accommodate for the impacts caused by 860 new residences. Specifically, an uninterrupted trail system, increased buffer areas, and minimum amounts of private park and open space tracts are included in the *Proposed Action Alternative*.

ROS-AC-2 Desirable Open Spaces

Recognize that lands desirable for public open space purposes are diverse and include steep slopes; scenic view areas; water frontage; wooded areas; unique natural features; drumlins; gulches; wetlands and streams; shorelines; greenbelts; gardens; plazas; landscaped corridors; fish and wildlife habitats; aquifer recharge areas, flood hazard areas; geologically hazardous areas; recreational areas; historic areas; undeveloped or derelict land, land abutting open space areas, strategically located lands and other areas.

Comment: Consistent with this policy, the City has considered the impacts of the *Proposed Action* on desirable public open space. The *Proposed Action* will not directly modify public open space, since the golf course is privately owned. The City has requested mitigation for indirect impacts to public open space (parks) managed by Metro Parks Tacoma (see DSEIS **Section 3.2 Recreation**).

ROS-AC-3 Greenbelt/Habitat Areas

Recognize the value of open space areas as green belts, buffers, and wildlife habitats and vegetated areas.

Comment: Consistent with this policy, the City has considered impacts to greenbelt/habitat areas resulting from the *Proposed Action*, and

finding that insufficient vegetated buffering was maintained between existing and *Proposed Development*, the City proposed the *Proposed Action Alternative*. This alternative would provide for greater green belts (or open space transition areas) surrounding the perimeter of the development site. This continuous green belt would provide for wildlife habitat area and preserve many of the mature trees along the perimeter. Further, the Proponent has indicated that no modifications or impacts will occur to the regulated critical areas (including wetlands and a stream) on site or their associated buffers. The *Proposed Development* site does not contain any mapped habitat corridor areas.

ROS-AC-8 Balance Open Space and Development

Balance the public desire for open space areas with the need to provide for private development.

Comment: Consistent with this policy, in reviewing *The Point at Northshore* the City has attempted to balance the public's desire for open space areas with the need to provide for private development. The need for private development is recognized throughout the City; and if this proposal is approved, staff finds that the *Proposed Action Alternative* better achieves a balance of providing more usable open space that also serves as buffers for existing homes.

Additional analysis on open space review and standards is located in the DSEIS **Section 3.1 Land Use Compatibility and Aesthetics** and **Section 3.2 Recreation**.

ROS-AC-9 Promote Steep Slope Views

Recognize, protect and promote the visual qualities and the view potential offered by steep slope areas.

Comment: Consistent with this policy, the City has analyzed the view potential offered by nearby sloped areas and has conducted a detailed analysis of existing and future views under the *No Action*, *Proposed Action*, and *Proposed Action Alternative* scenarios. Presently, the existing golf course sits at a lower elevation than many of the adjacent residences. Per the Proponent's proposal, the site would be filled in many locations to accommodate building sites, roads, and necessary utilities. Additional fill will reduce the elevation difference from existing homes. The view analysis contained within the DSEIS **Section 3.1 Land Use Compatibility and Aesthetics** provides visual depictions of how the views from homes sitting on steeper slopes would be impacted. The *Proposed Action Alternative* presents a possible development scenario that would add additional vegetative buffers between existing and *Proposed Development*.

ROS-AC-10 Open Space Corridors

Recognize that open space corridors or linear open spaces can provide visual or physical connections between neighborhoods, centers, and open space areas and strive to protect lands which can physically and functionally link other open spaces.

Comment: Consistent with this policy, the City has reviewed the *Proposed Action* for its impact to open space corridors and has provided mitigation

where necessary. In addition to mitigation contained in the DSEIS, the *Point at Northshore* must comply with all other City of Tacoma ordinances, standards, and policies, including the *Critical Areas Preservation Ordinance*. As previously noted, the Proponent had proposed a north-south trail system that was comprised of a mix of public sidewalk and unimproved trails. It is staff's opinion that this disjointed trail system is not ideal or effective for recreational purposes; and therefore, in the *Proposed Action Alternative*, the City recommends that an uninterrupted trail system, surrounding the entire site, be provided within the open space transition zones (see DSEIS **Section 3.1 Land Use Compatibility and Aesthetics**).

ROS-AC-11 Size of Corridors

Recognize that open space corridors are comprised of a variety of open space types and that their size will vary according to the function of the particular open spaces in the system.

Comment: Consistent with this policy, the City has presented the *Proposed Action Alternative*, which, along with other measures, requires an open space transition buffer surrounding *The Point at Northshore*. The open space transition buffer has a variety of widths and characteristics, depending on surrounding development. For additional information, see DSEIS **Section 3.1 Land Use Compatibility and Aesthetics** and FSEIS **Appendix D Land Use Affected Environment and Impact Analysis**.

Although the DSEIS **Section 3.2 Recreation** also considers recommended sizes/amounts of park and open space area per capita, staff encourages the Proponent to review the City's recently adopted (December 2008) *Open Space Plan*. The Proponent may wish to amend certain design elements of *The Point at Northshore* by using the policies as guidance on innovative ways of working with the City and other public agencies to create desirable open space for view corridors, retaining wooded areas and preserving of existing topography.

ROS-AC-13 Wildlife Migration

Encourage the protection and retention of natural open space corridors as wildlife habitats and as corridors for their movement.

Comment: Consistent with this policy, the City has reviewed the *Proposed Action* for impacts to wildlife migration. In addition to mitigation listed in the DSEIS **Section 3.5 Critical Areas**, the Proponent will be required to comply with all other City policies and standards regarding wildlife management and retention of natural open space corridors. Additionally, as previously noted, the *Proposed Action Alternative* would provide for larger greater green belts (or open space transition areas) surrounding the perimeter of the development site. This continuous green belt would provide for wildlife habitat area and preserve many of the mature trees along the perimeter.

ROS-AC-15 Natural Features

Protect and preserve as many desirable natural features as is possible and appropriate such as drumlins and streams with minimum to no alteration, where feasible, through zoning,

design standards, permitting, and site plan development in public and private development including development of utilities and services facilities.

Comment: Consistent with this policy, the City has reviewed the *Proposed Action* for impacts to natural features. In addition to mitigation listed in the DSEIS **Section 3.5 Critical Areas**, the Proponent will be required to comply with all other City policies and standards regarding natural areas. The Proponent has indicated that no impacts to the regulated critical areas, or their associated buffers, will occur as part of the development.

ROS-AC-17 Recreation Site Design

Promote design and development of recreation and open space facilities that enhance Tacoma's natural setting and that complement the ecology and unique features of the site or area.

Comment: As discussed in the DSEIS **Section 3.2 Recreation**, the City of Tacoma has analyzed the potential impacts of *The Point at Northshore* on public recreation and open space facilities managed by Metro Parks Tacoma. Because of anticipated increases in demand to park and recreation facilities in the vicinity of the site, and because of the redevelopment of the North Shore Golf Course, a private recreational facility, mitigation is recommended for off-site facilities in the form of pro-rata payments to the cost of off-site football fields and an indoor gym, and to onsite facilities in the form of trails, parks, sports courts, play structures, and open lawn areas. Through its analysis and recommendations for mitigation, the City has acted consistent with this policy.

ROS-AC-18 Natural, Scenic and Historic Features

Develop and preserve natural, scenic and historic areas and resources as scenic and historic routes or sites.

Comment: North Shore Golf Course has local significance as a scenic and recreational amenity to existing residents of Northshore Country Club Estates. Development under the *Proposed Action* would be inconsistent with this policy to preserve scenic resources.

Neighborhood Element

- Purpose and Intent (p. Neigh – 5)

The primary purpose of the Neighborhood Element is to provide a vision and policies unique to each neighborhood in the context of the City's overall growth and development vision. The neighborhood vision and area policies supplement other policies of the *Comprehensive Plan* and provide more specific guidance for land use decisions. The purpose of this element of the *Comprehensive Plan* is to provide neighborhoods with an additional tool to

guide development. If a conflict arises between policies found in the Neighborhood Element and a citywide policy, the neighborhood policies shall prevail.

- Northeast Tacoma Neighborhood Community Profile (Neigh – 17)

Located in the extreme northeast section of Tacoma with most of its housing developed since World War II, Northeast Tacoma is both physically and socially separate from the rest of the city. With most of its population and housing arriving since 1980, the area represents a community of new residential subdivisions comprising a large number of family households with homeownership, incomes and education well above city averages. As remaining subdivisions are completed, future growth will be confined given the focus on single-family zoning and the limitations of the remaining undeveloped land that includes steep slopes, canyons and gulches. Since a few major employers exist in or near Northeast Tacoma, the vast majority of residents commute to employment opportunities, especially in King County. With older and/or uncompleted arterial streets, circulation needs have become a key concern.

- Northeast Tacoma Neighborhood Area Vision (Neigh -17)

The vision for the residents of Northeast Tacoma, as represented in the Northeast Tacoma Action Strategy, is:

“A low-density residential district with limited commercial and multifamily development, focusing on the automobile for transportation, with access to recreational activities, open space as well as basic public and private facilities and services.”

- **Residential Development**

The vision stresses a predominance of single-family detached type housing. This means infilling of the vacant areas within existing single-family detached housing areas with the same type of housing. It also means that additional areas will be developed as single-family detached housing areas.

Limited duplex and triplex type housing and other low density multifamily developments such as townhouses or low rise apartments may be appropriate as a buffer use adjacent to commercial areas. They may also be developed in a very limited basis on sites with unique characteristics, or they may be considered as a part of a Planned Residential District. The design of such developments would be in character with the area in which they are locating, and any adverse features would be minimized.

- Northeast Tacoma Neighborhood Goals and Policies (Neigh-20)

- Goal NET-1 Residential**

Maintain the area’s predominant low-density single-family character while preserving the unique natural features associated with living in Northeast Tacoma.

Intent - Northeast Tacoma is and will continue to be a predominantly single-family residential community. It is intended that existing single-family residential neighborhoods be preserved and protected from incompatible land uses and that future residential development maintain a single-family detached housing type. It is recognized that limited development of duplex, triplex, and other multiple-family housing (e.g. townhouses, condominiums) may be appropriate under certain circumstances. Such housing should be

located within medium or other low intensity areas as a buffer between commercial and single-family developments with direct access to an arterial street and/or be developed under the Planned Residential Development (PRD) district concept. While single-person, young married or elderly households may desire such housing, such multifamily developments should be scaled in terms of building size and bulk, design, and landscaping to fit the area and not cause an adverse impact to the existing single-family neighborhoods. All residential developments should retain or establish vegetation that is visually attractive to the area.

Unique features (e.g. steep slopes) should be preserved, acknowledging there may be some limited development on certain developable portions. Any development on steep slopes, however, must be low density, generally no greater than three dwelling units per acre, minimize any adverse environmental impacts and be unobtrusive to the surrounding area. Existing housing located directly above on the cliff must be protected from negative impacts.

The policy intent is to encourage continued development of single-family housing and to protect the Northeast Tacoma area from other types of development that would adversely affect or change its character. Positive qualities associated with single-family areas include low density, compatibility of structures, sense of openness, low traffic volume and small scale structures. While some unique sites may be desirable or appropriate for development other than single-family housing, future development should take into consideration other existing policies including the preservation of steep slopes. The viability of single-family detached housing areas depends upon maintaining these characteristics and new development should be sited and scaled to blend with it.

Policy NET-1.2 Visual Attractiveness

Residential developments should either maintain the existing natural vegetation or provide new landscaping adding to the area's sense of open space.

Comment: As currently proposed, the *Proposed Action* is not consistent with this policy. Based on the proposed layout of the development and grading activities, the *Proposed Development* will remove the majority of the existing mature trees and vegetation on the site. The Proponent has submitted "typical" landscape plans for the parks, stormwater ponds, roads, etc.; however, the plans do not provide a comprehensive analysis of the type and location of plantings. Further, the Proponent has indicated that some existing trees would remain on the site, but has not submitted a tree retention plan indicating the location of those trees. Further, the Proponent has requested reduced minimum lot sizes and setbacks which will further decrease the area's sense of open space as many existing, surrounding lots, exceed the City's minimum development standards.

Policy NET-1.3 Minimum Lot Sizes

Encourage single-family subdivision developers to provide minimum lot sizes equal to or greater in size than average lot sizes in existing single-family subdivisions. If there are no subdivisions, the maximum should be eight lots to the acre.

Comment: Similar to policy NET-1.2 above, as currently proposed the *Proposed Action* is not consistent with this policy. As previously noted, the Proponent is proposing single-family lots that neither comply with the minimum lot size standards for the "R-2 PRD" District, nor are equal to

or greater in size than average lot sizes in existing, surrounding subdivisions. Specifically, the development of the single-family detached portion of the site is proposing a majority of the lots to be smaller than the 5,000 square foot lot area minimum and minimum average lot width of 50 feet. See also additional analysis in the comment for policy LU-UAD-1.

- Recreation and Open Space (pp. Neigh-21 – Neigh-22)

Goal NET-4 Recreation and Open Space

Provide a range of recreational and open space opportunities to the residents of Northeast Tacoma consistent with the changing needs of the area.

Comment: Consistent with this goal, staff has reviewed the *Proposed Action* for impacts to recreation and open space, and has recommended mitigation to ensure a range of onsite and offsite recreation and open space opportunities are available to the residents of Northeast Tacoma, including the proposed 860 new households (see DSEIS **Sections 3.1 Land Use Compatibility and Aesthetics** and **3.2 Recreation**). The mitigation, contained in the DSEIS, varies from publicly accessible onsite trails, parks, sports courts, play structures, and open lawn areas, to the Proponent contributing their pro-rata share to the cost of off-site football fields and an indoor gym.

Intent - Twenty years ago, open space in Northeast Tacoma was abundant in both form and variety, but subsequent residential development has consumed much of the land. In addition, remaining large parcels have been generally developed into large residential subdivisions. To provide the necessary recreation and open space amenities, it is imperative that existing park projects be completed, that new recreational opportunities be identified and that remaining open space (e.g. slopes, gulches) be retained to help maintain the area's quality of life. The intent is to enhance the provision of open space and recreational opportunities with both public and private resources. Properties located adjacent to existing parks, steep slopes and remaining undeveloped gulches need to be targeted for open space acquisition. Recreationally deficient areas such as Upper Browns Point, Harbor Ridge and Northwood should be given special consideration. Also essential will be a good working relationship between those who provide opportunities (e.g. Metro Parks, Tacoma School District, City of Tacoma) and those residents who use the facilities and services. Improvements to key recreational facilities such as Norpoint Community Park and Alderwood Park need to be completed as soon as possible. Also, a trail system needs to be developed for walking and bicycling that would link Northeast Tacoma to other systems in Tacoma, Federal Way, Fife, Browns Point and Dash Point. Finally, the community needs to take advantage of its scenic views and vistas by establishing and/or improving (e.g. landscaping, paving, litter containers, etc.) public access to slope sites such as Norpoint Park located on Norpoint Way.

Policy NET-4.3 Unique Natural Features

Require developers to provide and maintain landscaping of projects and to preserve any unique areas as open space.

Comment: The development site at *The Point at Northshore* contains landscaping features such as ponds, mature trees, rolling grassy areas, and natural and landscaped shrubbery. Under the *Proposed Action* the Proponent will retain the four largest of the existing seven

ponds and some perimeter landscaping. A total of six ponds would be provided. New landscaping in the form of a 1.7 acre central park, several pocket parks, and the proposed trail system will be added. Staff finds that this application does not exemplify a good faith effort to preserve the unique areas and open space at the development site; almost all of the existing trees and natural areas will be removed and replaced with limited amounts of vegetation; a substantial amount of grading and filling will eliminate the site's existing topography; the trail system consists of a series disconnected concrete sidewalk and trails; and the ponds that are retained are required for on-site storm detention and four of the ponds already exist. Therefore, staff finds the *Proposed Action* to be inconsistent with this policy.

Policy NET-4.4 Recreational Opportunities

Develop regulations to require large-scale residential developers (e.g. subdivisions) to provide recreational opportunities within those developments to help meet the recreational needs of the residents.

Comment: Consistent with this policy, the City has developed Planned Residential District development regulations, *Tacoma Municipal Code* 13.06.140.F.6, which require recreational opportunities within new developments. Specifically, the code states:

Usable Open Space. A minimum of one-third of that area of the site not covered by buildings or dedicated street right-of-way shall be developed and maintained as usable landscaped recreation areas. All open space shall be maintained free of litter and of conditions constituting a potential public nuisance.

Further, the Platting Chapter of the *Tacoma Municipal Code*, 13.04.260 provides:

Due consideration shall be given by the subdivider to the allocation of suitable areas for schools, parks and playgrounds to be dedicated, by covenants in the deeds, for public use or reserved for the common use of all owners of property within the subdivision. Public open spaces shall conform to the comprehensive plan of the City. In lieu of dedication for open space, the City may require payment of a fee of \$25.00 per lot contained in the subdivision. The fee shall be used for the acquisition and/or development of parks or open space land which will benefit the residents of the subject subdivision and the citizens of the City of Tacoma. The above reference fee shall be applicable to all plats.

The *Proposed Action* will be required to meet such standards, and additional mitigation is recommended in the DSEIS, as described above (see also **Section 3.2 Recreation**).

Goal NET-5 Transportation

Achieve a safe and efficient multi-modal transportation system which provides for the present and future land use and population needs of Northeast Tacoma.

Comment: This is a City-wide planning policy that is not specifically applicable to the *Proposed Action*; however the *Proposed Action* does include bike

lanes and pedestrian trails; and in order to be consistent with this goal, the City will require that *The Point at Northshore* complies with all City standards and regulations relating to transportation systems. Where necessary, the DSEIS has recommended mitigation to assure that acceptable transportation levels of service and facilities are provided at *The Point at Northshore*.

Goal NET-6 Community Facilities

Provide a broad range of community facilities and services that are distributed fairly and equitably to meet the needs of the residents of all ages and of all areas within Northeast Tacoma.

Comment: In order to act consistent with this goal, the City will require the Proponent to meet all City standards and regulations relating to facilities levels of service and facilities distribution. Where necessary, the DSEIS has recommended mitigation to assure community facilities will meet the needs of Northeast Tacoma residents.

Goal NET-7 Utilities and Services

To develop, maintain and properly distribute an adequate system of utilities and provide for an acceptable level of police, fire, refuse collection and street cleaning services for area residents.

Comment: In order to act consistent with this goal, the City will require the Proponent to meet all City standards and regulations relating to utility levels of service, including police, fire, refuse collection, and street cleaning services.

Goal NET-8 Special Areas - Steep Slope Areas Trees, Views and Native American Cultural Sites

Intent - As Northeast Tacoma has developed, there has been a significant loss of mature trees and new efforts need to be made to retain the remaining trees. The trees add visual beauty, aid in erosion prevention and re-oxygenation and provide wildlife habitats. Planting of new trees should occur in areas where retention is not feasible. As an asset of the area, view also deserves consideration for promotion, protection and/or preservation pursuant to the City's view sensitive ordinance. As an area for early Puyallup and Nisqually cultural activities, it is also important that preservation and other actions be implemented in support of identified historic or prehistoric sites.

Policy NET-8.3 Site Views/Minimize View Blockage

Development within potential view areas should utilize various building designs, site layouts, street arrangements and orientation to maximize and protect the view potentials and minimize view blockage of adjacent sites.

Comment: Development under the *Proposed Action* would be inconsistent with this policy. New residences at *The Point at Northshore* would generally be constructed lower than adjacent homes and will have little, if any, views. Adjacent homes, however, are anticipated to have their views impacted. As previously discussed, the DSEIS identifies in the view analysis contained in **Section 3.1 Land Use Compatibility and Aesthetics** how existing views would be impacted by the *Proposed Development*. The *Proposed Action Alternative* identifies a

lesser scale development that would incorporate open space transition zones to reduce impacts to existing scenic and territorial views from adjacent residences, thus improving consistency with this policy.

Growth Strategy and Development Concept Element

○ **Section I – Background (GD-2)**

For some residents, continued growth means prosperity and a healthy city. For others, any amount of growth is undesirable. It is unrealistic to think that growth will not occur in our city. In the past several years, increasing numbers of people have been attracted to the Pacific Northwest area. With so many coming to our area, the problem the city faces is how much, when and where should growth take place.

The *Comprehensive Plan* for growth and development adopted by the City of Tacoma addresses managed, desirable growth and development and, as such, can be considered a major force for shaping and reshaping the city's urban form. The Plan is a means of managing growth in a way that is physically, socially and environmentally acceptable, while at the same time providing for the preservation, redevelopment and improvement of the City's established residential neighborhoods.

○ **Section II – Assumptions (GD-2)**

Residential Development (GD-3)

Housing will continue to be developed in the urban growth area outside the city's boundaries where adequate facilities and services are available. Residential density is likely to increase in mixed-use centers, along some major transportation routes, near transit centers, and within or near employment and shopping centers.

Environment (GD-4)

Air, noise and water pollution will continue to be of special concern to the region. Maintaining the quality of the air we breathe, the quiet of our residential neighborhoods, and the quality of the water we drink, live around and use for recreation is essential for assuring the health and welfare of the region. The region's economic development is dependent upon water-related commerce and trade. Maintaining pollution-free waters is vital to present and future economic interests. Ensuring that the region's water resources remain relatively pollution free is paramount to its survival and continual growth and development.

Measures to control suspended particulates (dust, smoke, fumes and other liquid or solid matter) will continue to be needed to maintain air quality in the region. Reduction of the level of transportation related emissions will continue to be important in addressing air pollution problems. Transportation plans and policies concerned with traffic congestion and related air and noise pollution will focus on a multi-modal transportation system and the curtailment of single-occupancy vehicle use.

○ **Section IV – Development Intensities (GD-6)**

Low Intensity Development (GD-7)

Low activity patterns and traffic generation characterize low intensity development. Low intensity development is predominantly single-family residential development, but can include duplexes, triplexes, and small-scale multifamily development. Supportive neighborhood convenience commercial establishments and community facilities such as churches, schools, libraries and fire stations also are considered low intensity uses. Open space areas may also be considered a low intensity use and can include recreational areas and parks. To better differentiate the range of uses within low intensity areas, single-family detached housing areas are delineated separately.

Community Facilities Policy Plan

Existing facilities and services (page 10)

Community facilities (public, quasi-public and private) provide a location where specific types of group activity or services can be provided. Community facilities are buildings and other capital improvements used for the delivery of public services. They provide places for public assembly, social and health services and for the administration of public affairs as well as facilities for transportation or utilities. Examples include schools, libraries, correctional institutions, police and fire stations, government office buildings, airports, solid waste transfer stations, transit terminals and maintenance facilities. Some community facilities are privately built and operated. These include churches, hospitals, nursing homes, community club buildings and private or parochial schools.

Community facilities vary widely in character and impact. Some are residential in character or associated with residential areas such as schools and libraries. The location of some facilities may be dependent on other considerations such as transportation or utility system needs. Because the term community facilities encompasses a large number of diverse facilities and uses, they have been grouped into general categories to aid discussion. The following pages provide an overview of existing community facilities in Tacoma.

Schools – Educational services in Tacoma are both publicly and privately operated. In Tacoma, public schools are operated by Tacoma School District No. 10. The district operates 57 separate facilities comprised of 5 high schools, 10 junior high schools and 42 elementary schools. Bates Vocational School is also operated by Tacoma Public Schools. State law sets the standards for service levels and facility development of public schools.

The District has been experiencing a declining enrollment in the past few years as a result of a lower birth rate and smaller families. This decline in enrollment may result in the use of surplus schools, where appropriate, for health clinics, community centers or other uses. Currently the School District with the aid of several citizen committees is conducting an in-depth study on its education facilities in the city, including facility standards, enrollment projections, location of new facilities and possible school closures. The recommendations of the citizen committees will be presented to the Tacoma School Board during the late fall of this year.

Parks and Recreation – Public recreation and open space facilities are a specialized type of community facility. They are owned and/or operated by the Metropolitan Park District, the Tacoma School District or the City of Tacoma. Existing facilities include parks, playgrounds, improved school sites, trails, bikeways, gulches, and steep slopes. Facilities offered by the private sector such as movie theaters, bowling alleys or skating rinks are also considered as a part of the existing facilities available to meet a portion of recreation needs.

Northeast Tacoma Planning Area (pp. 26-27) – Page 26 & 27 of the plan indicated “North Shore Golf Course, 4101 North Shore Blvd., Tacoma, Washington as an “Existing Facility”.

Existing Facilities

- North Shore Golf Course, 4101 North Shore Blvd., Tacoma, Washington

Goals and Policies – Location and Design

- **(2) Aesthetics and facilities (p. 49)**

Encourage community facilities to be coordinated and integrated with surrounding land uses so as to aesthetically enhance the neighborhood in which they are located and to minimize any inherent nuisance, influence or disrupt on adjacent properties.