



City of Tacoma
Planning Commission

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October 20, 2021

Kristin Lynett, Manager
Office of Environmental Policy and Sustainability
City of Tacoma
747 Market Street
Tacoma, WA 98405

RE: Planning Commission's Comments on the Climate Action Plan

Ms. Lynett,

This letter provides official comment and feedback on the draft City of Tacoma [2021 Climate Action Plan](#) (CAP). The Planning Commission recognizes that the goal of this plan is to reach net carbon neutrality in Tacoma by the year 2050 to coincide with similar national goals outlined in the Paris Climate Accords. The objective of net carbon neutrality by 2050 is informed by findings from the Intergovernmental Panel on Climate Change (IPCC) to avert extreme impacts to living systems, human populations and built infrastructure as a result of human-caused climate change.

We recognize the findings of the [City of Tacoma Greenhouse Gas Inventory and Business as Usual Scenario Report \(2019\)](#) which underlies the CAP. This inventory identifies the two largest attributable pools of climate change emissions in Tacoma as being related to transportation (44%) and industrial (30%) sources. The draft CAP proposes action to diminish the quantity of emissions from these and other sources. The CAP holds no provision for expanded use or processing of fossil fuels in a heavy manufacturing or industrial capacity in Tacoma, which would endanger the ability of the City to reach net carbon neutrality by 2050. This consideration of no further expanded emissions should be made explicit and apply to the Tideflats Subarea Plan process to align the City's environmental initiatives.

We appreciate the approach made by the Office of Environmental Policy and Sustainability (OEPS) and the Sustainable Tacoma Commission to provide for an inclusive and equitable community process to gather input and develop the CAP. We support the representation of low income, BIPOC, and other frontline groups who are experiencing the greatest impacts to physical and emotional well-being as a result of climate change in the development and implementation of the CAP. We applaud inclusion and elevation of these voices and recognize that such action is in line with the City's Anti-Racist Transformation Resolution 40622, which calls for the need to "transform all of the institutions, systems, policies, and practices impacted by systemic racism" and for "listening to the voices of those which have been marginalized, silenced, or ignored."

One Tacoma Comprehensive Plan References

The One Tacoma Comprehensive Plan makes reference to goals to reduce climate change emissions with policies that encourage reductions in fossil fuel use, while also reflecting the best available science about what impacts the City and its residents should be prepared for in the coming years. These impacts range from rising sea levels, to extreme storms, increased erosion, reduced snowpack, and more intense forest fire seasons. Many references to climate change are found in [Chapter 4: Environment + Watershed Health](#). The CAP reflects these goals and policies and builds on them. Chapter 4 does not include a specific goal for net carbon neutrality by any date. However, an update with such a reference in that chapter could serve as a policy basis for validating concurrence with other plans the Planning Commission periodically reviews (e.g., Capital Facilities Plan, Six Year Transportation Plan).

Future Conditions

Several recommendations made in the CAP in the “Mobility and Land Use” section (p. 45-50, [Appendix 2: Implementation Actions](#)) make reference to future growth. The Planning Commission’s principle work involves information in this area. We seek to ensure that the analysis conducted by OEPS accurately reflects: 1) official growth projections, and 2) the nature of expected new development. According to the draft CAP, between 2019 and 2050 Tacoma is projected to add 56,324 units of housing, 114,558 residents, 82,827 jobs, and 77,851 new personal vehicles (p. 7, [Appendix 1: Energy & Emissions Modeling Results](#)).

All new projected growth in Tacoma is planned to be ‘infill’ in nature and most will be located in our regional growth and mixed use centers or adjacent to high capacity transit corridors. This new development will differ in makeup from other areas of the city. It is likely to be of a more compact, walkable pattern with generally less required space and infrastructure for private vehicles (see references in Tacoma Municipal Code, e.g., Chapter 13, p.326 ‘*Reduced Parking Area*’ et al.). In short, our land use policies combined with spatial and economic constraints, may result in an increasing number of households with fewer personal vehicles than residents.

These conditions should play a part in the makeup of modeling assumptions in Appendix 1 for Vehicles per Household (VPH). The CAP assumes that VPH will stay roughly the same between 2019 (1.81) and 2050 (1.77). The statement, “*Personal vehicle ownership is expected to follow a similar trend to that of population growth*” is made (p. 7, Appendix 1). However, since a number of counterexamples exist in growing cities in Europe and Asia and in cities referenced in the CAP itself (p. 18, Plan Summary), the Planning Commission encourages a revision of the statement on p. 7 as an assumption for quantitative analysis in the model. We encourage the use of numerical assumptions which embrace the “20-minute Neighborhood” concept, which reduces dependence on the automobile for mobility and encourages shorter trips made by different modes.

Additional Feedback from Commissioners

Many of the proposed actions in Appendix 2 broaden the reach of the City of Tacoma by engaging other actors, such as: Pierce County, NW Seaport Alliance, Pierce Transit, et al. This reflects suggestions made by the Planning Commission (Chair Petersen, 10/21/2020).

New policies will be needed to reinforce density in areas with access to public and shared transit services. These policies will deemphasize the need to employ automobiles in areas of high residential and employment density. The City should incentivize development in such a way as to equitably improve walkable access to daily goods and services in all neighborhoods. These changes will allow residents to choose to walk, bike, and ride to more destinations (Commissioner Givens, Chair Petersen, 10/21/2020).

To develop a carbon-free transportation system by 2050, the City needs to do more than convert fuel sources for vehicles. For example, to grow transit ridership, service must be available at the hours of day that residents need it, it must be frequent enough to allow flexibility in schedules, and it must be direct, reliable and timely enough to compete with car travel. The CAP supports this goal with Action 10, which is a measure to “Increase staff capacity to coordinate on transit projects and implement the green transportation hierarchy..... Coordinate land use changes with high-capacity transit investments to support transit-oriented development.” This action is a high priority of the Planning Commission and will help the City to plan, track, and implement transit projects and land use changes that improve

service and access to transit. It will also help the City better understand the diverse population that relies on transit services: commuters, people with disabilities, seniors, people of color, students, and people on fixed incomes, facilitating equitable forms of transit oriented development. An additional action the City could add to the CAP would be to set a goal for road space for transit just as there is a goal for setting space aside for new sidewalks, bike lanes and trails. (Vice-Chair Karnes, 10/20/2021).

Where the CAP will meet its first test is in the adoption of Tideflats Non-Interim Regulations and the Tideflats Subarea Plan, which will both influence long term trends for greenhouse gas emissions in the industrial sector. The next tests of the CAP will be seen in development of the City's biennial budget to implement the 2022-2024 short-term recommendations and in the character and composition of a renewed Tacoma Streets Initiative to identify transportation projects for funding over the next decade, which support the goal of net carbon neutrality by the year 2050.

We appreciate the opportunity to receive a briefing of the subject from you at our meeting on October 20, 2021. We fully support the City Council to adopt the CAP and would like to offer the following additional comments and suggestions for its implementation:

- Develop a sustainable transportation funding package by identifying matching funds and leveraging resources for transportation infrastructure improvements needed to help fulfill the goals of the CAP.
- Consider adopting local energy code in concert with the State's energy code to address such critical issues as reduced use of fossil fuel, green buildings, and green industry.
- Strengthen the language for action items beyond the word "encourage," e.g., consider changes to parking requirements that support the goals of the CAP, and increase public oversight over roadway projects that could contribute to additional emissions.
- With 80% of the proposed actions applicable to "planning", the CAP is not just about the climate; it's about land use, transportation, environment, energy, health, safety, lifestyle change, and more. Its implementation should be non-automobile centric. We should encourage people to use transit. It is critical to note that it costs money to own, drive, park, and maintain personal vehicles.

In closing, this is an ambitious and robust effort undertaken by the Office of Environmental Policy and Sustainability and the Sustainable Tacoma Commission to conduct a carbon wedge analysis and to use the results to propose bold climate action. We thank the participants in the community, including the climate ambassadors for their involvement and input.

Thank you again for the opportunity to review and comment on the draft 2021 Climate Action Plan.

Sincerely,



Anna Petersen, Chair
Tacoma Planning Commission
(Position: "Environmental Community")



Chris Karnes, Vice Chair
Tacoma Planning Commission
(Position: "Public Transportation")