



Citizens for a Healthy Bay

October 20, 2021

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Submitted electronically to Kristin.lynett@cityoftacoma.org

Re: 2021 draft Tacoma Climate Action Plan

Members of the Tacoma Climate Action Planning Team,

Thank you for the opportunity to comment on the 2021 draft Tacoma Climate Action Plan (CAP). For 31 years, Citizens for a Healthy Bay (CHB) has been holding polluters accountable, protecting, and restoring Commencement Bay and surrounding ecosystems for people and nature. We are committed to collaborating with and mobilizing community members, particularly those disproportionately impacted by environmental injustices. CHB staff have been involved in coordinating community engagement for Tacoma climate action planning since September 2020 and have spent many subsequent hours reviewing drafted strategies and actions for greenhouse gas emission reduction and climate resiliency. Hearing directly from community members through the climate action planning process has given CHB staff considerable insight into the needs and priorities of Tacoma's communities.

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We are writing in support of adopting and fully funding the Tacoma CAP and to offer additional recommendations to strengthen the City's response to climate change. This Plan can help deliver healthy, affordable housing; clean, reliable transportation; protections for public health; and green, good-paying jobs for Tacoma. These are things our community has needed and asked for – for years.

In 2019, the City declared a climate emergency, recognizing the immense challenges and hardship climate change poses to our communities and the opportunities we must utilize in order to avoid these impacts - if we act now. According to a recent [United Nations report](#), 2021 is a “[make-or-break year](#)” to make bold climate action investments to avoid [irreversible, catastrophic climate change](#). We are already experiencing excess heat events, earlier snow melts, and the impacts of wildfires. It is time to act. The City has recognized climate change as an emergency and must fully fund climate actions that bring multiple health, access, and economic benefits to our communities.

The following sections outline recommended edits to the draft Tacoma CAP to ensure this Plan brings maximum benefits to our communities, holds the City accountable for funding and implementing actions, and moves aggressively to avoid climate impacts:

Achieving Zero Emissions

Through the CAP, Tacoma has an opportunity to be a leader on climate action and set aggressive emission reduction goals that align with international and Washington State net zero emission targets for 2050. To be anywhere near on-track for net zero emissions in 2050, the City Council needs to fully fund and implement the Tacoma CAP – at a minimum. We encourage City of Tacoma to consider an even more aggressive emission reduction timeline in recognition that [developed economies may need to reach net zero emissions before 2050](#) to allow developing economies more time to transition. We need to be considering climate justice within our city and the wider, international community that is disadvantaged by extractive, polluting industries. [Recently both China and Russia have signaled they are aiming for net zero by 2060](#), a full decade after our absolute latest deadline. That means it is the responsibility of communities like ours who have the resources, to push for net zero as close to 2040 as possible. This is in line with European nations and some of the worlds most advanced economies like [Austria, Germany, and Sweden](#).

Financing the Plan

To reach net zero by mid-century Tacoma must invest 2.5 billion dollars, according to the models presented in the CAP. While yearly investments may vary and will likely ramp up over time, on average we need to be investing roughly 86 million dollars a year to make sure we are steadily working towards an equitable climate and thriving communities. Ultimately, these investments could result in net savings of 4.18 billion dollars (Appendix 4). A paramount question is, will the City of Tacoma accommodate this in the near-term budget? Plans without implementation dollars equate to good ideas that further exacerbate tensions between community and government, when individuals are constantly asked to share their visions, struggles, and needs, while little to no tangible changes are made by their local governments. The City must allocate immediate funding from the 2021-2022 Mid-Biennium Budget Adjustment, Federal Recovery Funds, and additional grants for the “jump-start” actions. As outlined in Appendix 5, this will require 63.4 million of funding this year. We expect additional funding in the 2023-2024 Biennium Budget to fully fund and implement all 46 near-term actions in the Plan as well as new financing strategies to sustain climate actions through 2050 along a net zero pathway.

Just Transition and Tacoma’s Green Economy

Jobs and environment go hand in hand. This is the narrative we must constantly build upon if we are to avert climate ruin while protecting and even advancing economic prosperity for all, not just the wealthy few. In future efforts CHB would like to see more ambitious jobs and justice initiatives when tasked with advancing climate justice. Tacoma needs its elected leaders to spearhead efforts around a local ‘Green Jobs Corps’ that can advance our twin goals of training our workforce and beating back climate ruin. The CAP starts the conversation on this, but this is an initiative only political leadership has the power to advance and effectively deliver for communities in need. Actions 32, 33, and 37, 38, are crucial initiatives that the need to be planned for and accommodated in the biennium budget adjustment, and fully funded in the 2023-2024 budget cycle if we are to truly advance a just transition for Tacoma and all those who depend on it. Strong public-private partnerships that involve workers in decision-making should be instrumental in Tacoma’s green economy development over the next decade.

Mobility and Land Use

As a growing city, Tacoma needs to be investing in healthy, affordable housing with access to reliable transit and safe, walkable and rollable neighborhoods. We have heard many concerns about bus route availability and reliability from community members throughout the climate action planning process. Working closely with Pierce Transit, Sound Transit, and local transportation organizations to offer public transportation options that truly rival single-occupancy vehicles needs to be a top priority. Action 12, updating the street design guidelines, is an opportunity to set new standards for developing complete streets with integrated active transportation

Governance and Engagement

We appreciate the City's emphasis on engaging frontline communities (Action 1) - those already overburdened by inequities, environmental injustices, and climate impacts, and supporting community organizers in leading climate action (Action 4). To maintain momentum and community climate leadership built over the past year, the City needs a long-term investment plan for community-lead environmental justice work. CHB has helped coordinate an Environmental Justice Leaders Workgroup to give input on the Tacoma climate action planning process. We have heard considerable interest from the community in continued City support for a frontline community-focused environmental justice advisory body. While the Sustainable Tacoma Commission does serve a watch-dog function for the CAP, uncompensated volunteer hours and requirements that commissioners live within city limits can be additionally burdensome for frontline community members. We want to see the City fund an environmental justice advisory group with compensated roles and coordinated by a community organization or, more generally, create a revolving fund for community-lead climate action. Such efforts would build community capacity and reduce barriers to civic participation.

During the timeframe of the CAP's development, there were other ongoing City processes to engage community members in the Port Sub-Area Plan, Home in Tacoma re-zoning, Tacoma Watershed Plan, and more. We heard from community participants that navigating these various planning processes and understanding their relationship to the CAP was challenging. Our communities would benefit from and be better equipped to hold the City accountable to its goals if there was greater transparency available on how City-wide strategic plans work together on key issues like housing, health, jobs, and climate. We would like to see the City invest in civic engagement trainings and work across planning efforts to coordinate outreach in future community engagement processes.

The Burden of Responsibility

We appreciate the inclusion of a "What You Can Do for Tacoma Climate Action" section that acknowledges the small impact daily choices community members can take to reduce carbon emissions, including the advocacy role we can all play in systemic, transformational change. However, the burden of reducing emissions at the scale needed to reach our goals should not fall on individual community members who cannot afford low carbon alternatives. Tacoma's institutions and industries that have reinforced our reliance on fossil fuels and are responsible for historical and present-day emissions must bear the upfront cost of the low carbon transition. The City needs to make low carbon options accessible to our communities. This burden of responsibility needs to be reflected in all CAP actions.

For example, CHB has heard some community concern about a potentially punitive ban on food waste in garbage that would impact residents (Action 24). To equitably implement Action 24, the City should start with food waste diversion requirements for large, commercial food waste producers, work with landlords to increase access to food waste recycling, and build value chains for local compost. [San Francisco's Mandatory Recycling and Composting Ordinance](#) is an example for how Tacoma can hold multi-family and commercial property managers accountable for proper waste sorting without enforcing fines on residents or individual homeowners.

Accountability

We appreciate the detailed 2024 outputs for each Action listed in Appendix 4 and the quantitative 2030 Targets provided in Appendix 3 to track progress on the Plan's implementation. However, there are no 2030 Targets currently listed in Appendix 3 to track success on Governance and Engagement. We would like to see 2030 Targets set for tracking the number of community members engaged throughout implementation, their demographics to ensure frontline voices are prioritized (Action 1), and the amount of funding provided to community-lead projects (Actions 2-4).

To hold the City accountable for commitments in the CAP, the final Plan needs more accurate cost estimates for each action. All 46 actions in this Plan are urgent and, to implement this work efficiently, both staff and partners need realistic parameters and strong financial support. Additionally, Appendix 5 only covers funding recommendations for the “jump-start” actions. The final Plan needs a robust analysis of all financing options available to the City to fully implement all 2024 Actions and future iterations of the Plan through 2050.

The City of Tacoma’s effort to create a more community-driven 2020-2021 climate action planning process has been a great first step towards more equitable strategic planning. We hope the City continues to learn from this process, improving engagement and build relationships with our diverse communities. We are pleased with the increased urgency and scope of climate action this new Plan sets out for Tacoma to accomplish in comparison to past emission reduction efforts. For our communities, human and non-human, and the generations to come, the City must act ambitiously – fully funding and implementing this Plan and more. We look forward to future partnerships to support a resilient, zero carbon future for all Tacomans.

Sincerely,



Melissa Malott
Executive Director
Citizens for a Healthy Bay