

DRAFT MEMORANDUM

To: Thurston Climate Mitigation Plan Steering Committee

From: Brad Medrud, City of Tumwater
Allison Osterberg, Thurston Regional Planning Council

Subject: Requested Amendments to Final Draft of Thurston Climate Mitigation Plan

Date: December 10, 2020

The City of Tumwater requests the Steering Committee make the following changes to Chapter 5 of the November 2020 draft of the *Thurston Climate Mitigation Plan* before final approval of the plan. The changes are related to comments provided by the City of Tumwater during the public review period in two sections of Chapter 5 ([See Comments #377 and #388](#) in full comment record). Page numbers refer to the [November 2020 Layout Version of the Thurston Climate Mitigation Plan](#).

- **Chapter 5 – Strategies and Actions, Section 5.3** - Add an explicit goal to reduce continued urban sprawl outside of UGAs. This itself will do more to reduce transportation emissions than anything else we can do locally.
 - Page 82, Action T1.1 – Revise action description: “**coordinated long term planning-future infill and urban sprawl reduction**. Coordinate long-term plans with transit agencies to project where increased density would support more transit corridors. Then change zoning/density that would support new transit corridors and variety of household incomes. Promote long-term equity and healthy communities by developing incentives such as density bonuses for development where a percentage of the units will be permanently affordable for household incomes. Look for opportunities to meet the Sustainable Thurston land use vision by reducing urban sprawl.”
 - Page 83, Action T1.11 – Revise action description: “**land use efficiency**. Set integrated goals to consider network efficiency and reduce urban sprawl in land use decisions, including how density in certain areas supports transit, increases efficiency of utility service, and other support facilities. Consider vehicle miles traveled (VMT) in identifying locations for large employment facilities.”
 - Page 88, Transportation and Land Use Sector, Targets and Indicators: Add the following targets:
 - Baseline Year: 2010
 - By 2035, 72 percent of all (new and existing) households in our cities, towns, and unincorporated urban growth areas will be within a half-mile (comparable to a 20-minute walk) of an urban center, corridor, or neighborhood center.
 - By 2035, at least 17 percent of homes in Lacey, Olympia, and Tumwater’s urban areas will be located in an urban corridor or center.
 - Between 2010 and 2035, no more than 5 percent of new housing will locate in the rural area.

- **Chapter 5 – Strategies and Actions, Section 5.5**

- **Prairie preservation:** More explicitly recognize that prairies have a role in carbon sequestration. The HCPs for the County and City of Tumwater will be adding more than 5,000 acres of protected prairies over the next 30 years of the HCPs (Thurston County Draft HCP attached from August 2020 and our numbers are from this summer). The Thurston County HCP just finished NEPA/SEPA EIS scoping and Tumwater will be doing our scoping in early 2021. The County will be committing half of all its annual conservation futures dollars to purchasing properties to create protected habitat. That is \$1.5 million for the HCP from the \$3 million collected during the past two years and not spent. The details of this work is too recent for the workgroups to account for it, but it is important that the TCMP recognize this work, so it can build in ways to capture those benefits over the course of the Plan and not create unintended conflicts with forest preservation goals.
- **Tree canopy:** Change references from preserving individual trees to preserving tree canopy. The assessed actions on page 95 and the targets and performance indicators on page 96 all refer to tree canopy rather than individual trees. This matches the approach that jurisdictions are taking with their Urban Forestry Management Plans and regulations.
- Changes to section 5.5
 - Page 95, A5/A6 – Revise strategy description: “**Preserve ~~trees~~ tree canopy and manage forests and prairies to sequester carbon.** Trees have been called the lungs of our planet, and they also can be very effective at removing carbon from the air and storing it in the soil. Historically, tall stands of Douglas fir, cedar and other tree species covered far more of Western Washington than they do today. Conserving existing ~~trees~~ tree canopy and forest areas and restoring areas that have been cleared can help to offset emissions from other activities, while providing a host of benefits for our local environment from storing and cleaning water to providing habitat for many sensitive species. Prairies can sequester large amounts of carbon in the roots of plants, and this sequestering is less vulnerable to fires than trees. Furthermore, working to preserve prairies will not only help several endangered species survive, it will reduce opportunities for urban sprawl. In enacting this strategy, it will be important to balance the carbon sequestering capacity of ~~trees~~ forests and prairies with the emission reducing potential of dense urban development and renewable energy infrastructure.”
 - Page 95, Add new action: “Action A7.1: prairie preservation. Support aggressive implementation of habitat conservation plans that provide for preservation and restoration of prairie habitat for endangered and threatened prairie species. NOTE: the sequestration role of prairies was not assessed for the plan, and language and actions related to prairies was added after the multicriteria analysis for the plan was completed, at the direction of the Steering Committee.” Under Impact GHG = 2 bars; Under Impact Other, Highlight * for Ecosystem Health co-benefit.
 - Page 96: “Agriculture, ~~and~~ Forests, and Prairies Sector: Targets and Indicators”
 - Revise third Target: “Manage forestland and prairies sufficient to sequester 375,000 tons of CO2 annually by 2050.”
 - Revise fourth indicator: “Acres of ~~trees~~ tree canopy protected.”
 - Add indicator: “Acres of prairies protected.”

Other relevant public comment: Staff received other public comments on this section during the public comment period requesting that the plan use the word “trees” rather than “tree canopy” in Chapter 5. [Full text of comments can be viewed online.](#)

- **Comment #319, Thurston Climate Action Team:** Existing trees are far more effective at drawing down carbon and storing it than new trees. (Planting new trees is called for in the afforestation section of the plan.) While this item says protection in the title the definition does not include actual protections in the form of some limits on tree cutting. If we cut down existing trees at the same time we’re planting new trees, we may be reducing the amount of CO2 we’re drawing down rather than increasing it. We know from other cities it is possible to promote urban density and protect trees at the same time when both are held as climate goals.”
- **Comment #338, E.J. Zita:** “Reforestation & Afforestation, Municipal Canopy, and Tree Canopy Preservation should be ranked higher. Trees should not be sacrificed in “logging for gophers” schemes (these are already being permitted locally). Deforestation to provide possible habitat for endangered/threatened species, and to permit more development in open spaces, is counterproductive. Instead, implement TDR/PDR (transfer and purchase of development rights) as recommended by the Agriculture Advisory Committee in 2017.

While grasslands do sequester carbon, and may be less vulnerable to fire than forests, this “does not suggest that grasslands should replace forests on the landscape or diminish the many other benefits of trees.”

<https://climatechange.ucdavis.edu/news/grasslands-more-reliable-carbon-sink-than-trees/>

I agree that a top “priority needs to be preservation of wooded areas [with] trees for carbon reduction” (p.87 of the Draft TCMP).”

- **Comment #340, Lynn Fitz-Hugh:** “My primary concerns still lie with the trees section of the plan. I feel that as a group we have not gotten clear about the relationship between tree planting and tree protection. We started with tree planting which does increase our ability to sequester over time, but over looks the importance of protecting existing trees. I am grateful they came to be included, but there remains much confusion about the relationship between the two in achieving our goals.... The item A6.9 which is called Tree Canopy Preservation does not define the item in a way which will preserve canopy. There are two problems with this item. The use of the term tree canopy is common in city governance and policy making but has a vagueness that makes it very hard for the implementation of policy. Tree canopy is usually measured aerially by lidar or by drip line from a tree. But trees cross human boundaries so you cannot make rules about trees based upon percentage of canopy, as part of the canopy on an individual’s property may come from an adjoining property. Setting tree canopy goals is really about afforestation. It does not protect trees. Therefore, what this item needs to call for is ordinances that will define in some way tree cutting limits.”
- **Comment #395, Thurston Conservation District:** Wholeheartedly support all three actions under this strategy, but need refinement to achieve optimum success. Recommend an emphasis on preserving existing trees and forests, including support for tree conservation by small landowners, including urban landowners and developers.