



## Public Comments

**Meeting:** Wednesday, April 3, 2024

**Submittal:** Written comments received at [planning@cityoftacoma.org](mailto:planning@cityoftacoma.org)

**The Commission does not accept comments on the Home In Tacoma item, because it is the subject of a recent public hearing (on March 6, 2024) and the hearing record has already been closed. This comment is being forwarded as an “FYI”.**

**Subjects:** Comments are addressing the following Discussion Item(s) on the agenda:

### **F1 – Home In Tacoma – Phase 2**

**No. of  
Comments:** One



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¿Necesitas información en español? Cần thông tin bằng tiếng Việt? 한국어로 정보가 필요하십니까? ត្រូវការព័ត៌មានជាភាសាខ្មែរ?

Нужна информация на русском? Потрібна інформація українською мовою? Contact TacomaFIRST 311 at (253) 591-5000.



**From:** [Courtney Davis](#)  
**To:** [Planning](#)  
**Subject:** Concerns from the TPAG letter that was written  
**Date:** Thursday, March 28, 2024 10:44:12 PM

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Dear Planning Commission-

I'd like to express my concerns around the studies cited and the points made by the Tacoma Permit Advisory Group in relation to the tree retention requirements and also in relation to their request to allow the permitting department to make temporary edits to the code and bypass city council.

First off, the study they cited to state that younger trees sequester more carbon and their statement that "tree retention requirements....are not as good for the environment as might be expected" do not paint a full and accurate picture. If you look at [the linked article](#) (from the TPAG letter), it states that most likely, mature trees are shown to sequester less carbon in the PNW because they are typically clearcut after the age of 40 yrs. "When plots with harvesting activity during or immediately prior to our study period are excluded, aboveground live tree carbon accumulation rates increase considerably in these regions, particularly in the...41–60 (Pacific Northwest West) age classes... "When plots with a recent history of natural disturbance are excluded the effect is noticeable, indicating that disturbance is the likely driver of the decline in rate." Essentially, because trees are cut down/harvested around the 40 yr mark, this is the main reason there is a decline in carbon sequestration in forests in the PNW. Mature trees are able to store more carbon overall, as stated in [this study](#) by the Pacific Forest Trust.

TPAG states that mature trees do not offer benefits in the way that young/new trees do, and that simply is false. Mature trees offer health benefits, protections from heat island effect, increase our tree canopy much faster than smaller trees, create a habitat for animals, and are much more aesthetically pleasing than new, smaller trees. TPAG makes mention of these things, but states that it's a "worthwhile trade off" to remove all tree retention requirements. This is not a worthwhile tradeoff. They also state that it is inequitable to move forward with the tree retention requirements proposed in HiT. The comical thing is that their proposal exacerbates the inequity.....it does not make things more equitable. If tree removal requirements are taken out, then all mature trees left in the areas that have the least amount of tree cover are completely vulnerable. Some areas of the city have as low as 8% tree canopy and that could easily be decreased even further if there are no tree retention requirements with HiT.

Lastly, it is so frustrating to see the "power grab" that TPAG attempts to make with their final suggestion to the planning commission, asking that power be given to the planning department to make temporary edits to code. Please do not allow this suggestion to move forward. We have a system and a process in place for a reason. The unelected city manager's office already has too much power over the way this city is run and we need to empower the city council, which has been elected by a vote of the people to make changes to code that will affect our city.

We need a strong tree retention and protection system within the city of Tacoma, and this group is using their power within the planning department and city manager's office to directly profit off of these new development standards without putting the needed green infrastructure in place. The letter by TPAG is well word-smithed, and I'd ask you to look at it carefully. This group benefits financially from relaxed requirements, so it is natural to assume that they would take issue with new requirements.

Thank you for your time,  
Courtney Davis