



Tacoma Climate and Sustainability Commission

October 16, 2025

Dear Chair Walker and IPS Committee,

The Climate and Sustainability Commission is writing to share our recommendation that the City of Tacoma adopt the Tideflats Subarea Plan as is, *without* adopting Chapter 13, section 9 regarding Landscaping Requirements for Self Managed Agencies. The Tideflats subarea is the neighborhood with the lowest tree canopy in the city. While we applaud the plan's stated intentions to expand tree canopy in the tideflats, we are concerned that this amendment would be detrimental to that goal for the following reasons.

- It sets inconsistent precedence. If the Port is allowed to develop properties without following the landscaping requirements, it creates a double-standard with respect to private landowners. Our local governments must lead by example when it comes to enhancing environmental and public health benefits on private property.
- Urban trees should be located where people work and live and should be integrated into the urban landscape. A single tree can reduce temperatures in parking lots and near buildings. Allowing trees to be planted off-site (a.k.a. "Tree banking") would reduce the environmental and human health benefits that trees provide.
- The current plan does not provide sufficient accountability. First, any urban forest plan proposed by the Port should be approved by an urban forester, not just the Director of Planning and Development Services. Second, if such a plan is approved, there must be a mechanism for ensuring that the required trees will actually be planted and established.

As the Tacoma-Pierce County Health Department pointed out in its [Health Impact Assessment](#) about this plan, "Landscaping requirements have the potential to improve air quality, stormwater and groundwater quality, and could provide additional health benefits like reductions in urban heat." We believe the Port of Tacoma and other public agencies should be required to integrate trees into the urban fabric, just as private entities will be required to do. We therefore urge you not to adopt this loophole.

Sincerely,

Eulondo Cooper III

Evlondo Cooper, Co-Chair

Casey Twiggs

Casey Twiggs, Co-Chair
Sustainable Tacoma Commission

Cc:

Jacques Colon, Center for Strategic Priorities Director

Peter Huffman, Planning and Development Services Department Director

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Tacoma Planning Commission

