



## 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 update the Critical Areas Ordinance (CAO) with a priority for enhanced protections of sensitive habitats. Over and over, community members have expressed a priority to protect and enhance nature within the City. We know that nearby nature has direct benefits to human health and quality of life.

We support the City's present efforts to update its CAO to better align with state requirements and best available science but recommend the following as part of the code update:

- Include a setback of at least 10 feet for new structures located adjacent to critical area buffers to better protect areas from construction and operational impacts. It would be impossible to develop and construct a new structure, let alone access the perimeter of the structure without encroaching into the existing narrower off-limits buffer.
- Increase protections for Oregon white oak trees, which are considered a priority species by the state of Washington and are important in maintaining our local biodiversity. According to the U.S. Forest Service, "Over 200 species of mammals, birds, reptiles, amphibians, and insects—some of them rare or threatened—use oaks for the shelter and food they provide." Tacoma should follow the example of neighboring Lakewood, which recently [updated its municipal codes](#) to regulate Oregon white oaks. Including similar provisions in this CAO update would provide much-needed clarity to City staff on how to comply with the state's [management recommendations](#) regarding this signature species.
- Develop an in lieu fee (ILF) program, coordinated with the new Watershed Plan and Climate Ready Urban Landscape and Habitat Strategy (i.e. wetlands, shoreline and fish habitat, etc.). Currently, Pierce County has an ILF for wetlands and the Port of Tacoma has a mitigation bank to offset development impacts on fish habitat and wetlands, but Tacoma lacks a city-wide mitigation bank and/or ILF program, making it impossible to mitigate for development harms. The City should prioritize this effort.

We understand and appreciate that housing is a significant challenge for Tacoma, and applaud Home in Tacoma for eliminating single family zoning. Our CAO protects critical habitats, which deserve similar

attention and protections as required by state law. We urge you to follow the guidance of the Planning Commission by strengthening the Critical Areas Ordinance through this update process.

Sincerely,

*Evlondo Cooper III*

Evlondo Cooper, Co-Chair

***Casey Twiggs***

Casey Twiggs, Co-Chair  
Sustainable Tacoma Commission

Cc:

Romero Chavez, Environmental Services Director

Jacques Colon, Center for Strategic Priorities Director

Peter Huffman, Planning and Development Services Department Director

Hyun Kim, Interim City Manager

Anna Le, Infrastructure, Planning, and Sustainability Committee Staff Liaison

Kristin Lynett, Sustainability Officer

Tacoma Planning Commission

