



March 19, 2020

Leaders of all of TCAT's action groups have met together and reviewed Options A and B. We are very appreciative of the work and thought that went into developing these options. We looked at items on both list (see below) that we feel do not move us forward and should be removed from the list. We also looked at the items from Option A that would be removed in Option B and found most of them are in fact very important.

We recommend removing the following 14 actions from any list for the reasons noted:

- B1.5 Property tax credit for energy efficiency – we don't believe this can be done at this level of government
- B2.3, LED lighting for public sector buildings. Together all of public sector operations for four jurisdictions represent less than 1% of total community emissions. Most have already mostly retrofitted street lights, which is the biggest share of their electric use and a high cost for cities. Since this is almost done it is not helpful to keep this on the list.

This makes best sense as part of a larger community wide action targeting all commercial buildings (elsewhere on the list). It could also be used as part of implementing such an action, to set an example for other building owners.

- B2.10, Grants. This is an implementation and funding strategy to achieve other goals (energy and technology innovation for commercial buildings). It should not be considered a separate action.
- B4.4, Green municipal buildings. This will have very low impact on its own (not that many municipal buildings). See above. This should be part of a broader community wide action targeting all commercial buildings. This is an action all jurisdictions are already be taking.
- B5.3, Municipal building solar. Again not very many municipal buildings and therefore, very low impact; should be part of a larger community wide action to promote solar in commercial building.

- T2.2, Congestion mitigation. The impact of this action cannot be measured using currently available data. GHG inventory calculates on-road transportation emissions using VMT. This will have no effect on VMT. Also, its impact, even if it could be measured, is questionable. Making it easier for people to drive cars by reducing congestion could be counter to our goal of reducing driving.
- T2.3, Reduce idling. As with 2.2, cannot be measured, and impact probably minimal.
- T2.4, Vehicle efficiency. As with 2.2, cannot be measured. Impact questionable. Discuss this as part of larger vehicle efficiency implementation.
- T4.1, Increase local public transit routes and frequency. According to available research, Thurston County has insufficient density for this to make much difference, and could be counter-productive. If transit service is increased in all areas of the county, it could actually increase GHG emissions. There must be a focus on the corridors where high quality transit will promote density and high use of transit. This should be done in conjunction with T1.11.
- T4.3. Rural transit. This could encourage more development in rural areas, which would be counter productive and increase GHG emissions.
- T1.9 Accessory Dwelling Units, more allowed: This has been passed by statewide legislature, but needs to be passed by local jurisdictions. Olympia already has a proposal for this. This will likely be done before the completion and adoption of TCMP. Jurisdictions should be encouraged to pass regulations in response to the state law that implement this in a way that will reduce greenhouse gasses. Not needed as a separate action in this plan.
- W1.1, Municipal energy efficiency. This is important for other reasons but will have minimal impact on community-wide emissions. Together all of public sector operations for four jurisdictions represent less than 1% of total community emissions.
- W2.2, Water audits. Same as above (W1.1)
- W3.1, Nitrous oxide capture. (This is listed under strategy, Reduce emissions from Waste Water treatment operations, presumably LOTT.) LOTT emissions are already extremely low. Assuming this is successful, impact would be negligible.

Below are 10 items that did not appear on one list or the other list which we feel our important for analysis by the consultant:

- B1.1 - "Require energy performance ratings and disclosures for homes at time of sale, lease, or rent so that owners, tenants, and prospective buyers are informed before making purchasing or rental decisions." For additional information, see the following link:

<https://climatetoolbox.info/residential-energy-performance-ratings/>

- B1.2 - "Develop and adopt policies that require residential properties to undertake an energy audit at the time of sale or during a substantial remodel. Work with financial institutions to develop mortgage products that incorporate audited energy efficiency recommendations." For additional information, see the following link:

<https://climatetoolbox.info/residential-energy-audits/>

*B1.6 Rental Housing EE baseline –

<https://climatetoolbox.info/rental-housing-energy-efficiency-baseline/>

*B2.8 Performance standards for commercial buildings

<https://climatetoolbox.info/commercial-performance-standards/>

*B5.8 – Solar ready construction – we hope this means south facing roof orientation in new construction that allow for solar panel installation. Adopting the Appendix to the current state code about solar ready is easy but not as significant as south facing.

B6.4 Ban on gas hook ups. On the Jan 15th top 50 list this had scored number two but now does not appear on either Option A or Option B. Some questions have been raised about whether the jurisdictions have the legal right to implement, but it appears there may be different approaches within the control of the jurisdictions and that changes may come on the state level as well. Because having no new gas heating, water heating or other appliances and devices in new residential buildings could potentially have very large GHG reductions ~~which would have to be implemented at some point~~, we would like to see this at least quantified by the consultant as well as the retrofit of existing homes. In order to meet the targets, using renewable electricity for residences will be needed. Having this quantified will help the steering committee evaluate whether this belongs in the plan.

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*T1.11 land use efficiency – we feel this one to be quite critical to making other items on the list work properly and to addressing certain equity issues.

*T3.10 Convert to Electric Fleet – new buses are only bought every 15 years or so, it is important therefore that these transitions be done in a way that will get us off of dirty fuels.

- G4.3 Other emission sources and sinks : Include other sectors (such as sequestration) in future GHG inventories; this will be critical in order to better understand sequestration and how to measure the impact of new agricultural and tree management approaches. This item therefore supports the two items above but also new solutions which may emerge.
- G1.7 Social research and behavior change campaigns (We feel this will be critical to the success of all of these endeavors)
- G4.4. Vulnerable Populations – this weaves these solutions into the plan across sectors.

The two items below we know there are issues about how to measure, but would like them included in the plan to hold a space for when national measurement issues are resolved and to also have the quantitative analysis be done on what their potential is.

- A2.1 Regenerative Agriculture: The greenhouse inventory only measures emissions from livestock. There are other emissions from farming that we have not known how to measure. Regenerative significantly reduces those emissions (for example, use of pesticides, tilling) and in addition sequesters carbon dioxide. We acknowledge that we do not currently have a way to measure this but want it included in this phase of quantitative analysis so that once we incorporate sequestration into our GHG inventory, using new ways of measuring sequestration being developed internationally this year, we will have a space in our plan to implement this as appropriate.

We further note that this has a climate adaptation benefit; regenerative agriculture is significantly more drought resistant thus providing an important protection and safer economic direction for Thurston farmers. A state bill just passed that will also support growth in this area

- A6.9 Municipal Tree Canopy protections (combined with A4.3 Tree codes and A4.3 tree cutting limits). 85% of our trees are on private property. While the city can improve its care and planting of trees on streets and parks (which can be included in the code) the real change will come by protecting older trees which are many times more effective at sequestering carbon dioxide than young trees. (Afforestation is also an important action.)

We are on track to lose significant number of trees with the density this plan will encourage. It is important to balance new building and retention of trees. We feel it is possible to do both but will require a new tree code carefully crafted. This also provides climate adaptation benefits. As we face the changes brought on by climate change, trees provide both significant cooling and significant storm water retention as more flooding is happening. With the item above we acknowledge the imperfection of current measuring methods but would like more analysis to be done on this item and it to be assessed for its potential impact once additional sequestration measures are included in our greenhouse gas inventory.

Thank you for your consideration of our thoughts on this, and for your continued dedication to helping our Thurston communities take bold and effective action on climate change.