



Becca Neumann (Position 4 – Hydrologist), Co-chair
Hao Liang (Position 6 – Landscape Architect – ISA), Co-Chair
Joshua Morris (Position 7 – NGO), Co-Chair
Allcia Kellogg (Position 2 – Urban Ecologist) • **David Baker** (Position 8 – Development)
Nathan Collins (Position 9 – Financial Analyst) • **Logan Woodyard** (Position 10 – Get Engaged)
Lia Hall (Position 13 – Community/Neighborhood)

April 24, 2024

Seattle Office of Planning and Community Development
600 4th Ave, Floor 5
Seattle, WA 98104

RE: Urban Forestry Commission (UFC) recommendations on the draft One Seattle Plan and draft EIS

Dear OPCD Staff,

The UFC was established in 2009 by [Ordinance 123052](#) to advise the Mayor and City Council concerning the establishment of policy and regulations governing the protection, management, and conservation of trees and vegetation in the City of Seattle. The UFC believes strongly in the value of our city's trees and urban forest, as city infrastructure vital to our quality of life and community resilience to climate change.

The UFC appreciates the work that the City and the Office of Planning and Community Development have put into developing the One Seattle Plan and balancing the many City goals needed to be accommodated in the Plan. Given the many benefits of the city's urban forest for Seattle residents, it is important to fully consider the urban forest in planning for the city's growth. The UFC appreciates the opportunity to provide feedback on the draft One Seattle Plan and offers the recommendations below based on this critical need.

The UFC's feedback centers on several main focus areas:

- Ensuring the city is moving toward growing tree canopy to meet the canopy goal of 30% canopy cover citywide by 2037.
- Ensuring that the benefits of trees for community health and well-being are clearly highlighted and incorporated into the goals and policies.
- Addressing equity in tree canopy; promoting access to urban forest benefits for underserved communities.
- Addressing biodiversity loss and ensuring this is incorporated into goals and policies.

What is good in the Plan – There are many areas in the One Seattle Plan the UFC appreciates, that align with the priorities and values of the UFC, and that the UFC would like to see retained in the final Plan.

These positive aspects to retain that align with UFC values and priorities include:

- Addition of the new Climate and Environment Element and dedicating a section within that to Tree Canopy.

- Reducing climate impacts and addressing climate resilience is woven throughout every element of the plan.
- Preserving and maintaining canopy and the importance of tree canopy are incorporated throughout the Plan. This starts to make necessary connections between tree canopy and other values, and it can be improved. There are recommendations to address this below.
- The focus on equitable housing options in the Housing Element is positive and necessary. Residents in that housing also need access to a healthy built environment, and trees are an essential part of that.
- The increased focus on green infrastructure / nature-based solutions is aligned with the UFC priorities around emphasizing the value of trees as critical infrastructure.
- The UFC values elevation of Indigenous voices, and appreciates the improved consideration of Tribal rights and leadership in environmental protection.

Recommendations to strengthen the Plan Elements and EIS analyses

The recommendations below are organized by the Plan Elements, in the order that those Elements appear in the Plan. The recommendations follow the format of describing observations and needs, then listing specific recommendations to address those issues. The bolded language highlights the high-level concepts for each area, and text in red italics indicates specific suggested language changes.

Please address our proposed edits to the draft One Seattle Plan as requests for incorporation into the analysis of impacts in the draft EIS, and as potential mitigation for adverse impacts that might not otherwise be addressed.

Growth Strategy

The UFC notes that it is hard from the information provided to understand the potential impacts of the Growth Strategy on tree canopy. **The UFC poses the following questions and suggestions in order to get more information/greater clarity on this:**

- Will we be able to meet our 30% canopy cover goal given the strategies, goals and policies included in the Plan? The UFC requests follow-up information and analysis to help answer this question; it is not answered in the analysis in the draft EIS. Given the availability of recent, high-resolution spatial datasets for tree canopy cover, **the UFC recommends strengthening the tree canopy analysis in the final EIS by investigating how tree canopy cover intersects with property ownership, equity categories, property redevelopment status, and alternate future land uses/place types to identify and quantify potential canopy loss due to updates to the Growth Strategy over the next twenty years.** For example, Seattle’s [2021 Canopy Assessment](#) found that on parcels where development occurred, an average of 34% canopy was lost on Neighborhood Residential lots and 50% on Multi-family lots. The canopy assessment also showed that Race and Social Justice Index priority neighborhoods started with less canopy and lost more canopy than the citywide average during the assessment period. The UFC requests that the City use these available data to inform analysis of potential canopy loss in the Neighborhood Residential Zone under the proposed growth strategy.

Additionally, the 2021 Canopy Assessment defined “redeveloped parcels” as sites that *both began and completed* construction of new buildings that added residential units or new commercial buildings between 2016-2021. Given this narrow definition, it’s possible this analysis may underestimate overall canopy loss due to redevelopment. **The UFC recommends additional analysis be incorporated into the final EIS to better understand potential impacts of redevelopment on canopy loss, particularly in Neighborhood Residential and Multifamily areas.**

- The supplemental report on proposed Neighborhood Residential zoning changes notes that “As part of the One Seattle Plan, the City is considering updating the tree planting requirements and

available departures in Neighborhood Residential zones. The purpose of this update would be to help meet citywide tree canopy within the new context of development allowed in these areas.”

The UFC affirms this approach and recommends tree planting requirements and available departures are updated and incorporated into the Plan. The UFC recommends these requirements be sufficient to encourage and prioritize tree retention and planting in the resulting available open space on lots. This is especially important given that 47% of the city’s tree canopy is in NR parcels and the proposed zoning changes may increase the probability of tree removal in these parcels.

- What is the impact of the proposed Growth Strategy and zoning changes, including the shift from 35-40% to 50% lot coverage in Neighborhood Residential zones, on canopy cover and available planting space and root zones, and what is the projected rate of change in canopy cover over time?

Land Use Element

- **The UFC recommends that the General Development Standards section include tree canopy in the listing of what the standards are intended to achieve, and that the policy related to the role of tree requirements be strengthened.** Both the discussion for this section and the policy related to tree requirements can be strengthened with the recommendations below:
 - Add to the last sentence of the discussion so that it reads: “They help ensure new buildings contribute to the overall neighborhood and advance city goals relating to public health and safety, utility service provision, open space *and tree canopy*, energy efficiency, and other topics.”
 - Amend Policy LU 4.8 to read: “Use tree requirements to preserve and enhance the City’s physical, aesthetic, and cultural character, *to enable the City to reach the 30% canopy cover goal*, and to enhance the value of trees in addressing stormwater management, pollution reduction, and heat island mitigation.”
- **The UFC recommends that the goals and policies for tree canopy, shorelines, riparian corridors, environmentally critical areas, and other important urban habitat features be strengthened, and their specificity and ambition be increased** to create a solid foundation on which to evaluate progress or success. Suggestions for this include:
 - Regulations for environmentally critical areas should seek to *enhance* ecological functions and values of wetlands and fish and wildlife conservation areas, in addition to protecting them. Our regulations should also protect the health and safety of both people and wildlife.
 - Revise goal LU G17 to read:

“Environmentally critical areas regulations seek to:

 - protect *and enhance* the ecological functions and values of wetlands and fish and wildlife conservation areas;
 - prevent erosion on steep slopes;
 - protect public health, safety, and welfare in areas subject to landslides, liquefaction, floods, or peat settlement;
 - inform the public by identifying seismic and volcanic hazard areas; and
 - minimize harm to people, *wildlife*, property, public resources, or the environment”
 - Recognize that sea-level rise threatens Seattle’s beaches and other coastal habitats, especially since most of our shoreline is armored, which prevents habitats from transgressing inland in response to rising seas.

Specific examples to address this include:

- Revise policy P1.14 to read: “Provide sustainable public access to shorelines by improving shoreline street ends, applying shoreline regulations, ~~and~~ acquiring waterfront land, *removing shoreline armoring, and restoring coastal habitat.*”
 - Add a policy to under Goal P G5 to read: “*Promote removal of shoreline armoring, coastal restoration, and managed retreat of structures away from areas at high risk of erosion, flooding or submersion due to sea-level rise.*”
- **The UFC recommends that the Historic Preservation and Cultural Resources section include natural heritage**, since natural features like big, mature trees, and the presence of certain iconic species like Salmon, Orca, Bald Eagles, etc., are living links to the past, are important cultural resources, and give Seattle its unique sense of place.

Suggestions to address this include:

- Acknowledge natural heritage and biodiversity as important historic and cultural resources by including a policy under Goal LU G16: “*Consult and collaborate with Tribes and urban Indigenous communities to protect and conserve natural heritage and to increase opportunities for traditional cultural practices.*”
- **The UFC recommends strengthening the discussion in the Urban Design section** by amending the second sentence to read: “These include well-defined and diverse mixed-use neighborhoods; *contiguous tree canopy cover*; compact, walkable scale; proximity to nature; and attractive parks, streets, and public spaces.”

Transportation Element

Walkability is mentioned in this element, but pedestrian friendly streets and walkability are dependent on trees. **The UFC recommends that the policies do more to incorporate green space and trees to improve the value and utility of walkable streets.**

Specific examples to address this include:

- Amend Policy T 2.5 to read: “Use pedestrian design guidance in the Right-of-Way Improvements Manual and guidance from the Seattle Transportation Plan to determine adequacy of the pedestrian realm, before allocating space to the flex zone or travel way, and, within the pedestrian realm, prioritize space to address safety concerns, network connectivity, *tree canopy cover*, and activation.”
- Amend Policy T 3.3 to read: “Develop and maintain a high-quality network of connected bicycle, pedestrian, and transit facilities *that adequately incorporate elements for non-vehicle travel, such as tree canopy and right of way green space.*”

UFC recommends improving connectivity together with tree planting, and prioritizing routes from high-density residential areas to public parks and green spaces. This encourages creating green corridors, enhancing pedestrian and bicycle paths, and ensuring safe, accessible, and equitable transportation for all residents.

Housing Element

The focus on equitable housing options is good. **However, the UFC believes that residents in that housing also need equitable access to a healthy built environment, and trees are an essential part of that.** The history of inequity also includes lack of access to trees and open space.

Specific examples to address this include:

- Add to the discussion section of this Element: “*Seattle’s history also includes a lack of investment in the neighborhoods of the city where people of color were restricted to, resulting in a less equitable built environment as well, including aspects such as fewer and less-maintained parks and open spaces and less tree canopy.*”

- Amend Policy H 1.4 to read: “Develop housing strategies that reflect the values and meet the specific needs of communities most impacted by housing discrimination and injustice, *including ensuring that the communities have equitable access to a healthy built environment.*”

Climate and Environment Element – Part 2: Healthy, Resilient Communities and Environment section

- **The UFC recommends amending Goal CE G12** to read: “Seattle has a healthy urban forest with tree canopy that covers at least 30% of the land, which maximizes the environmental, economic, social, and climate-related benefits of trees *and is achieved by 2037.*”

The UFC further encourages the City to continue to evaluate the canopy cover goal to ensure the city’s urban forests are supplying the needed functions and benefits in the face of climate change impacts, and to increase its ambitions around the urban forest. Canopy cover goals include more than tree numbers; they also include ensuring conditions enable tree health and forest sustainability. The overall goal number should be aspirational enough to accommodate that in the face of climate change impacts.

- **The UFC recommends that the role of trees as part of the built environment be emphasized, and that the fact that our infrastructure systems are interconnected be acknowledged.** For example, the amount of canopy cover we have affects how much stormwater our system needs to absorb – need to think about this as we consider how resilient the city is to climate impacts. Tree canopy also helps reduce reliance on mechanical cooling, electrical use, and the strain on power grid.

Some examples of language recommendations to achieve this include:

- Amend the fourth sentence in the second paragraph of the discussion section to include tree canopy as a missing community service: “Areas with fewer community services—such as grocery stores, parks, libraries, *tree canopy*, and transit—often coincide with neighborhoods that were historically redlined and have a higher population of residents of color, non-English speaking residents, and older adults.”
- Our trees/urban forest are part of our infrastructure, and they are assets, and are very susceptible to the impacts of climate change. Amend the statement in the third paragraph of the discussion section to: “While *some of* Seattle’s systems and assets are relatively resilient to the impacts of climate change, *some systems and assets such as the urban forest will continue to be strongly impacted by climate change*, and consequences and damages *to all systems and assets* are still highly likely during and after extreme events.”
- Amend Policy CE 11.2 to: “Coordinate efforts among City departments and with other public agencies to resource holistic flood hazard management efforts and implement innovative approaches such as integrating publicly owned open space, *and private properties with interested landowners*, into a green stormwater infrastructure system.”
- **The UFC recommends incorporating pest and disease issues in the Plan, since they are an increasing threat/impact to our trees and vegetation.** The UFC recommends adding to policy CE 7.4 so that it reads: “Consider climate impacts and embed climate adaptation into City plans such as land use plans, strategic business plans, system plans, infrastructure plans, capital facility plans, and asset management processes. *Advance the City’s pest readiness plans to ensure the City is prepared for and able to address pests and diseases impacting trees and vegetation at greater rates due to climate impacts.*”
- **The UFC recommends addressing introduced and ecologically harmful (invasive) species that continue to be a threat to the city’s ecosystems,** negatively impacting our climate resilience and resilience to pest/disease issues by reducing diversity of species. The UFC recommends including in the Planning for Resilience section this policy from the current Comp Plan: “*Promote sustainable management of public and private open spaces, trees, and vegetation by preserving or planting*

native and naturalized vegetation, removing invasive plants, improving soil health, using integrated pest management, and engaging the community in long-term stewardship activities.”

- **The UFC recommends that this Element include context around the global extinction crisis. Climate change and biodiversity loss are mutually reinforcing issues that need to be addressed simultaneously.** Trees are an important natural feature supporting wildlife and biodiversity. It is important that we have sufficient diversity in our trees and other vegetation, as well as canopy connectivity, to support greater diversity of animal life and providing greater benefits to the human population as well as greater resilience to climate change and other environmental threats.

Specific examples to address this include:

- Add discussion of the extinction crisis to the Climate and Environment section, by articulating why conserving urban biodiversity matters, and acknowledge that trees are one of the most important natural features supporting wildlife. Aspects to add to the discussion include noting that diverse, healthy habitats:
 - Underpin the functioning of ecosystems (pollination, seed dispersal, flood attenuation, scavenging, etc.)
 - Provide opportunities to experience and connect with nature close to home
 - Provide human health and well-being benefits
- Add to Policy CE 13.6 so that it reads: “Develop integrated and comprehensive approaches to restoring, protecting, and managing fish and wildlife habitat, such as reconnecting floodplains, *establishing riparian tree cover*, and removing fish barriers, to accelerate ecosystem recovery of salmon, orca, and other *endangered* species. *Ensure establishment and maintenance of climate resilient tree canopy for the support of wildlife and biodiversity.*”
- There is good discussion in the More Frequent Intense Storms and Longer Dry Periods section of the impacts of changing hydrological conditions. Goal CE G11, that “Seattle has planned for and adapted to the impacts of more frequent and more intense precipitation and storm events and longer dry periods”, is good, but all of the subordinate policies relate to stormwater management. **The UFC recommends adding a policy related to monitoring and managing vegetation health during prolonged drought.**
- **The UFC recommends strengthening language and policy around the heat island effect.** For example, in the Extreme Heat and Wildfire Smoke section, heat islands (experienced by residents of low-canopy neighborhoods) can be mentioned specifically in addition to extreme heat (felt by whole community).
- Additionally, the UFC notes that in the draft EIS, there is a statement on page 3.3-16: “In contrast to trees on private parcels, the benefits of trees in public-right-of-way are available to more people, including those from disadvantaged populations.” The UFC notes that trees provide benefits at multiple scales, and that trees on private lands provide public benefit well beyond the parcels in which they are rooted. **The UFC recommends deleting this sentence as the final EIS is developed.**

Parks and Open Space Element

- **The UFC recommends that throughout the Plan, the language makes the link between trees and quality of life and public health.** Specific language examples include:
 - In the discussion section, natural areas are only briefly noted in the list of public spaces. Natural areas and forests are not mentioned in the paragraph describing the variety of open spaces in the city. Add to the second paragraph: “Developed parks are not the only sources of open space that people enjoy in the city. *Natural areas within the city’s park system provide space for residents to reconnect with nature and community and enjoy the host of benefits associated*

with that. Open spaces and recreation opportunities are also located in public rights-of-way, such as along Cheasty and Ravenna Boulevards or in Bell Street Park...”

- The quality of our public spaces, as well as the level of tree canopy, in neighborhoods across the city is currently not equitable due to different levels of investment in the city’s neighborhoods over time. **The UFC recommends incorporating throughout the Plan goals and policies to advance equity in our public spaces and tree canopy.** Specific policy and language examples include:
 - Amend the second sentence in the Operations and Maintenance section discussion to: “Equitable maintenance practices prioritize the needs of BIPOC, low-income, and other underserved populations, ~~ensuring that public spaces in their neighborhoods receive the same level of attention and care as those in more affluent areas.~~ *In order to achieve equity in our public spaces, these areas should receive a higher level of maintenance to bring them up to the quality of those in more affluent areas.*”
- Amend Policy P 1.29 to read: ~~“Incorporate Indigenous ecological knowledge and culture in open space design, plant selection, and interpretive elements. Recognize and support Tribal leadership in conservation, restoration, and design of open space, plant selection, and interpretive elements.”~~

The UFC believes the urban forest is important to the goals and values of the Comprehensive Plan. Likewise, the Comprehensive Plan has important implications for the persistence, health and distribution of and the extent and quality of the benefits it provides. Trees and plantable space that are lost are not easily replaced. We acknowledge the relevance of the tree canopy growth as density and population grows.

Again, we appreciate the opportunity to provide this feedback, and look forward to serving as a resource to your team during the remaining planning efforts.

Sincerely,



Josh Morris, Co-Chair



Becca Neumann, Co-Chair



Hao Liang, Co-Chair

CC: OPCD Director Rico Quirindongo

Patti Bakker, Urban Forestry Commission Coordinator
City of Seattle, Office of Sustainability & Environment
PO Box 94729 Seattle, WA 98124-4729 Tel: 206-684-3194
www.seattle.gov/UrbanForestryCommission