

Urban Forestry Commission

Aaron Clark (Position 1 – Wildlife Biologist) • **Alicia Kellogg** (Position 2 – Urban Ecologist) • **Lani Chang** (Position 3 - Natural Resource Agency or University) • **Drue Epping** (Position 5 – Arborist) • **Tristan Fields** (Position 6 – Landscape Architect) • **David Baker** (Position 8 – Development) • **Timothy Randazzo** (Position 10 – Get Engaged) • **Melanie Ocasio** (Position 11 – Environmental Justice) • **Andrea Starbird** (Position 12 Public Health) • **Lia Hall** (Position 13 – Community/Neighborhood)

Date: September 9, 2025

To: Councilmember Joy Hollingsworth, Councilmember Mark Solomon, Councilmember Dan Strauss, Councilmember Robert Kettle, Councilmember Debora Juarez, Council President Sara Nelson, Councilmember Alexis Mercedes Rinck, Councilmember Maritza Rivera, and Councilmember Rob Saka

CC: Mayor Bruce Harrell, Interim Director Michelle Caulfield, Director Rico Quirindongo, Interim Director Kye Lee, Central Staff Director Ben Noble, Long Range Planning Manager Michael Hubner, and Strategic Advisor on Housing and Development Brennon Staley

From: Urban Forestry Commission

Subject: Urban Forestry Commission Recommendations on the Comprehensive Plan

Dear Seattle City Council Select Committee on the Comprehensive Plan,

In December 2024, the Urban Forestry Commission submitted informed [recommendations](#) to the Mayor's Office and OPCD regarding zoning updates in the One Seattle Plan. **As the bill and accompanying ordinance move to City Council, we want to reiterate three key recommendations (with minor modifications) that remain unaddressed in the current version. While we believe all of the UFC's remaining December 2024 recommendations would meaningfully contribute to the city's environmental objectives, these three would most strongly support the city's stated urban forestry goals of 30% canopy coverage by 2037.**

The Urban Forestry Commission fully supports the city's efforts to expand missing middle housing. We are committed to ensuring that this growth is achieved in a way that simultaneously increases housing development, public health, tree equity, and benefits communities and environmental quality citywide.

We've provided a snapshot of updated recommendations compared to the current ordinance and a detailed examination of importance and outcomes for those recommendations.

[Recommendations Snapshot](#)

Urban Forestry Commission

UFC proposal	Section
Recommendation 1 (R1) Require 75% of the amenity area be at ground level to encourage use of amenity areas to meet tree retention and planting requirements in other parts of the code (23.44, 25.11) and incentivize tree preservation and planting.* *This is a reduction in the previous 100% recommendation from the UFC to offer more balance in use.	23.44.110.D
<i>(R1) Current proposal requires only 50% of the amenity area be at ground level.</i>	
Recommendation 2 (R2) Emphasize tree potential in amenity areas and restrict nonpermeable surfaces. Add trees and green roofs to allowable items in amenity areas and remove current impervious surface allowances (swimming pools, spas, and hot tubs).	23.44.110.G,
<i>(R2) Current proposal allows non-permeable surfaces not conducive to tree establishment and growth.</i>	
Recommendation 3 (R3) Add requirement for retained trees counting towards tree points to be viable for retention. Trees must be in fair to good health prior to and after construction to be eligible for credits. Establish minimum required planting areas per tree size. Setting standards for soil volume minimums in the code will set trees up for long term success in the urban forest. Explore higher incentives for tree retention vs new tree planting. Weighing tree points for retained trees at a higher rate, or lowering the rate of newly planted trees to assign more appropriate value to existing canopy trees.	23.44.120
<i>(R3) As stated in our previous recommendations we are in favor of the tree point system, but the current proposal for tree points does not consider conditions of retained trees, or size of planting area compared to mature tree size.</i>	

Impact and Outcomes

Urban Forestry Commission

The first emphasized recommendations (R1, R2) center on language improvements to make amenity areas more hospitable locations for large tree retention and planting without making trees an amenity area requirement. This will encourage and incentivize use of amenity areas as urban green spaces that can be used by applicants and designers to meet, or exceed, tree requirements, and provide more flexibility and predictability for applicants during the permit process.

→ **Require 75% of the open space be at ground level and restrict nonpermeable and non-plantable surfaces within amenity zones**

Impact:

- ◆ Preserving these areas as hospitable locations for trees and limiting surface types would encourage tree retention and planting, and reserve more accessible green space in the city for public health, stormwater management, and heat island mitigation benefits.
- ◆ Maintaining 75% of these areas allows some flexibility to homeowners in use while supporting the need for critical green infrastructure in key neighborhoods.

Outcomes:

- ◆ NR zones make up 47% of our urban canopy and 39% of our land use. The "Tree Analysis (attached) shows that depending on housing typology, this canopy coverage may be brought down to as low as 19% in scenarios with ample parking to the best projection at 46.4% shown exclusively in redevelopment utilizing stacked flats.
- ◆ In order to maintain and grow tree canopy in the city with an equity lens we need to invite trees into more areas of design standards to overlap requirement areas which benefits trees, housing capacity and communities.

→ **Tree points must only be awarded for trees viable for retention and new trees must have ample space to grow to full potential**

Impact:

- ◆ Trees are resilient, however, to remain healthy and stable during and after changing site conditions, they must not already be in decline. In addition, new trees must be provided adequate room for establishment and mature growth.

Outcomes:

Urban Forestry Commission

- ◆ Trees should only be awarded points if they are viable for successful healthy retention. Without this requirement, projects may be awarded points for dying trees that will quickly be removed.
- ◆ Establishing minimum planting areas for trees counting towards tree points will aid trees in reaching their full potential and limit future conflicts with other infrastructure such as buildings, driveways, and patios.

Sincerely,

A handwritten signature in black ink, appearing to read "Drue Epping", with a long horizontal flourish extending to the right.

Drue Epping, Chair
Arborist, Position 5
Urban Forestry Commission