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August 17, 2022

Brennon Staley  
Office of Planning and Development  
700 5<sup>th</sup> Avenue  
Seattle, WA 98104

**RE: Urban Forestry Commission comments on 2024 Comprehensive Plan EIS Scoping Alternatives**

Dear Office of Planning and Community Development,

Duwamish Lands (Seattle, WA) – The Urban Forestry Commission (UFC) has identified the 2024 Comprehensive Planning update process as a key priority for commission engagement and input. The UFC is grateful for your early engagement and is looking forward to active involvement in this work.

Seattle’s urban forest within public and private lands plays important roles in our city’s ecology, economy, climate resiliency, and the health and wellbeing of people who live, work, and play here. Ensuring the urban forest is healthy, growing, and equitably distributed are critical aspects for meeting the City’s racial and social justice and sustainability goals.

Since urban forestry requires long planning horizons, trees must be a clear feature in our vision for future growth and development. The UFC recommends that urban forestry and related themes be a central element in the Comprehensive Plan Environmental Impact Statement process, with existing explicit Comprehensive Plan goals integrated throughout the final plan.

**Our recommendations pertaining to the EIS process and analysis are as follows, elaborated further below:**

1. Analyze the impact of all growth strategies on urban ecosystem services.
2. Analyze the impacts of all growth strategies on biodiversity.
3. Analyze the impacts of all growth strategies on human health and equity
4. Include an alternative that provides more evenly distributed density than Alternative 5.
5. Include an alternative based on an EcoDistrict planning model.
6. Consider a larger diversity of place types.
7. Consider a greater diversity of housing choices
8. Add additional biodiversity and climate impact considerations to Council’s request in Resolution 32059.

**(1) Analyze the impact of all growth strategies on urban ecosystem services.**

The EIS analysis for each alternative should examine impacts to our urban ecosystem services, many of which are provided by the urban forest, including existing trees and the potential for new trees. The UFC recommends following Barron, Sheppard & Cordon's<sup>1</sup> performance indicators: physical access to nature, canopy cover, stormwater control, habitat provision, air quality improvement, visual access to nature, available growing spaces, and greenhouse gas sequestration as key performance indicators.

**(2) Analyze the impacts of all growth strategies on biodiversity.**

The EIS analysis for each alternative should examine impacts to the city's biodiversity, including changes in the availability, quality and sustainability of terrestrial and aquatic habitat, and impacts to orca, salmon and other wildlife in the Salish Sea and connected waterways. The UFC also recommends assessing how each alternative could impact or enhance connectivity between parks and natural areas. Connectivity is the extent to which the landscape facilitates ease and safety of movement between parks and natural areas for non-motorized traffic. Connectivity should be considered for wildlife, including mammals, birds, pollinators and other insects, as well as people.

**(3) Analyze the impacts of all growth strategies on human health and equity.**

The EIS analysis for each alternative should examine impacts to human health outcomes, including negative effects associated with traffic and pollution, and positive effects associated with access to natural areas and open space. For example, Alternative 4 ("corridor") and Alternative 5 (combined), could focus or promote new development along corridors with frequent transportation. This could concentrate noise and pollution burdens on those who live along the corridors and also improve access to natural areas.

**(4) Include an alternative that provides more evenly distributed density than Alternative 5.**

Many "One Seattle" online responses are calling for a strategy that opens all zones to higher density development, including multi-family zoning everywhere, high rises in urban villages, and light industrial and commercial in residential zones. The City needs to explore all options available to address the housing crisis while planning for equitable canopy cover within all residential areas (considering the 2016 Tree Canopy Assessment that indicates that the greater the density, the extent of canopy cover is reduced). The UFC supports examining how less restrictive land use regulations could impact housing affordability, job creation, equitable urban forest, and wildlife habitat<sup>2</sup>.

**(5) Include an alternative based on an EcoDistrict planning model.** The UFC recommends analyzing how EcoDistricts – park-oriented, high-density development containing a diversity of housing types, including social housing, co-ops, market-rate housing and more – can be deployed in Seattle to promote diversity in housing, affordability and low-carbon living. The UFC recommends the Office of Planning and Community Development invite the Mayor, Seattle Planning Commission and City Council Land Use Committee to review Larch Labs' (and others) [presentation](#)<sup>3</sup> on alternative land use and urban forest

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<sup>1</sup> Barron, Sara, Stephen RJ Sheppard, and Patrick M. Condon. "Urban forest indicators for planning and designing future forests." *Forests* 7.9 (2016): 208.

<sup>2</sup> Most of Seattle's tree canopy cover is on land currently zoned as Neighborhood Residential. Sweeping changes in land use policy could have significant consequences for the urban forest.

<sup>3</sup> Digital recording of July 20, 2022 meeting; Larch Labs presentation starts at recording time stamp 25:20

planning initiatives, and benchmarking cities with similar context. These urban development strategies have been tested globally and provide compelling case studies for dense, livable communities with reduced needs for cars and a prioritization on the human experience.

**(6) Consider a larger diversity of place types.**

In addition to urban centers, urban villages, smaller nodes, corridors, and neighborhood residential areas, the UFC recommends including industrial zones and major institutional overlays in analyses. The study should consider appropriate modifications to land uses where the incremental completion of Sound Transit 3 transit growth through 2040 will result in greater access to jobs and denser mixed-use communities.

**(7) Consider a greater diversity of housing choices.**

The alternatives mention triplexes, fourplexes, townhouses, apartments, and commercial spaces. The UFC suggests expanding the consideration of housing types to also include high rises, co-ops, sixplexes, social housing, multi-family homes, stacked townhouses and rowhouses, accessory dwelling units and detached accessory dwelling units, cottages, tiny homes and more.

**(8) The UFC Supports Council’s Resolution 32059 prioritizing resilience.**

The UFC commends City Council for adopting [Resolution 32059](#), committing to address climate change and improve resilience as part of the One Seattle update to the Comprehensive Plan. The UFC supports the resolution and seconds its call to specifically develop new or revised goals to reduce greenhouse gas emissions, foster resilience, and work toward environmental justice in Seattle. The UFC offers to be a resource and partner to help develop policies and ideas for improving resilience of natural areas, enhancing tree canopy, identifying natural areas and infrastructure that may be vulnerable to changing environmental conditions, and more. The UFC’s key overarching additions to Resolution 32059’s goals and considerations are to:

- Call out the need to study the potential impacts of new and more deleterious pests and pathogens as a climate-related impact. For example, the emerald ash borer is an insect that infests trees in the genus *Fraxinus*. It has already killed tens of millions of trees in 30 US states. In July 2022, the emerald ash borer was found in a city near Portland, Oregon. The Seattle Committee on Invasive Pests is preparing for its arrival in our city. Fewer days of extreme cold due to climate change will allow the emerald ash borer and other pests to move further north or be active longer. More pests and pathogens will come. The future of our urban forest depends on our ability to be ready.
- Explicitly name “holistic urban biodiversity management” as a goal. Maintaining biodiversity is key to maintaining long-term ecosystem services and function<sup>4</sup>. Yet we tend to manage parks, natural areas, public and private land trees, wildlife, a small number of species (e.g., Great Blue Herons), and other natural assets discretely. Further, biodiversity conservation and climate change mitigation need to be more consciously coupled<sup>5</sup>. The two crises are related and can create feedback loops that exacerbate or complement each other.

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<sup>4</sup> Oliver, Tom H., et al. "Biodiversity and resilience of ecosystem functions." *Trends in ecology & evolution* 30.11 (2015): 673-684.

<sup>5</sup> Roberts, Callum M., Bethan C. O'Leary, and Julie P. Hawkins. "Climate change mitigation and nature conservation both require higher protected area targets." *Philosophical Transactions of the Royal Society B* 375.1794 (2020): 20190121.

The UFC makes the following additions to Council’s resolution, with **UFC recommended additions in bold**:

*Section 1. As part of the One Seattle update to the Comprehensive Plan, it is the City’s intent to address greenhouse gas emissions reductions, climate resiliency and adaptation, and environmental justice. City staff is directed to study and develop new and revised goals and policies founded in science that include, but are not limited to, the following:*

*A. Reducing overall greenhouse gas emissions, and other harmful pollutants that exacerbate climate impacts, including:*

- 1. Reducing per capita vehicle miles traveled within the city limits of Seattle;*
- 2. Increasing the amount and diversity of housing and providing amenities near housing to reduce dependence on cars;*
- 3. Planning for future transportation investments to equitably meet forecasted multimodal transportation demands across the city, **including safe walking and biking routes**; and*
- 4. Updating level of service standards for all locally owned arterials, transit routes, and active transportation facilities.*
- 5. **Assessing where street and alley or off-street parking can strategically be converted to plantable space for trees to reduce climate impacts and promote tree equity.***

*B. Fostering the resilience of natural and human systems to climate impacts and natural hazards, including:*

- 1. Enhancing the resilience of existing natural areas, including wetlands, riparian areas, and vital habitat for safe passage and species migration;*
- 2. Increasing resilience against natural hazards created or aggravated by climate change, including sea-level rise, landslides, flooding, drought, heat, smoke, wildfire, **pests and pathogens**, and other effects of changes to temperature and precipitation patterns;*
- 3. Leveraging investments in natural and “gray” infrastructure to increase climate resiliency and provide co-benefits, such as stormwater management, salmon recovery, and other ecosystem services; and*
- 4. Enhancing tree canopy to reduce airborne pollutants, decrease stormwater runoff, and mitigate urban heat island effects, particularly in residential areas with low canopy coverage.*
- 5. **Establishing goals and strategies for holistic management and conservation of Seattle’s urban biodiversity.***

*C. Working toward environmental justice by:*

- 1. Reducing environmental health disparities;*
- 2. Prioritizing work in communities that have experienced disproportionate harm due to air, water, and soil pollution or will disproportionately suffer from compounding environmental impacts and will be most impacted by natural hazards due to climate change;*
- 3. Providing opportunities for communities that have been displaced to return to the city in healthy environments and addressing the needs of those at risk of being displaced; and*

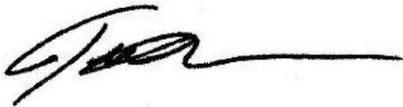
4. *Incorporating strategies to prevent displacement of vulnerable communities that could result from implementation of measures to address climate change and resiliency.*

*Section 2. The City should consider the following information when revising and adding to the Comprehensive Plan's goals and policies:*

- A. *Analysis of climate-related trends to identify current and anticipated impacts, including from the Seattle Hazard Identification and Vulnerability Analysis;*
- B. *Identification of vulnerable populations and assets (including social, cultural, and economic assets);*
- C. *Classification of risks, capital facilities and utilities, and community assets to determine where change is most needed to equitably address climate change, with a specific focus on vulnerable populations;*
- D. *Inventories of air, water, and ground transportation facilities and services, including transit alignments, active transportation facilities, and general aviation airport facilities;*
- E. *Analysis of disparities in health, environmental burden, and access to green space;*
- G. *Identification of natural areas and infrastructure that may be vulnerable to changing environmental conditions;*
- H. *Identification of environmentally critical areas, including habitat **and noting those that are rare or limited (e.g., native prairie), vital for safe passage and species migration;***
- I. ***Identification of trends in and projected climate impacts to Seattle's biodiversity, within city limits and within the natural areas and watersheds managed by the city that provide drinking water and utilities; and***
- J. ***Tree canopy assessment and trends in tree canopy cover across land use types and development patterns.***

The preservation of trees and open space is integral to reducing the impacts of natural hazards and improving quality of life for all Seattleites. The UFC looks forward to seeing the maintenance and growth of green spaces prioritized in Seattle's urban growth strategy.

Sincerely,



Julia Michalak, Co-Chair



Josh Morris, Co-Chair

cc: Sharon Lerman, Aja Hazelhoff

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