

SEATTLE URBAN FORESTRY COMMISSION

Weston Brinkley (Position #3 – University), Chair • Joanna Nelson de Flores (Position #7 – NGO), Vice-Chair
Steve Zemke (Position #1 – Wildlife Biologist) • Sandra Whiting (Position #2 – Urban Ecologist)
Sarah Rehder (Position #4 – Hydrologist) • Stuart Niven (Position #5 – Arborist – ISA)
Michael Walton (Position #6 – Landscape Architect – ISA) • Andrew Zellers (Position #8 – Development)
Craig Johnson (Position #9 – Economist) • Megan Herzog (Position #10 – Get Engaged)
Megan Herzog (Position #10 – Get Engaged) • Whit Bouton (Position #11 – Environmental Justice)
Jessica Jones (Position #12 – Public Health) • Shari Selch (Position #13 – Community/Neighborhood)

June 13, 2018.

Councilmember Mike O'Brien
Seattle City Hall
600 4th Avenue
Seattle, WA 98124

RE: UFC Comments to Accessory Dwelling Units (ADU) Draft EIS

Dear Councilmember O'Brien,

The Urban Forestry Commission (UFC) commends the ADU-Draft EIS for citing the importance of tree coverage for the City of Seattle, the goals outlined in the 2013 Urban Forest Stewardship Plan and the most recently published 2016 canopy cover assessment.

The UFC appreciates the ADU-Draft EIS incorporating recommendations it made in its [November 2016 letter](#), including removing the off-street parking requirement. However, the UFC disagrees with the ADU-Draft EIS determination of no significant unavoidable adverse impacts to the tree canopy reduction for the following reasons:

1. The ADU-Draft EIS underestimated tree canopy reduction from ADU policy, and
2. Stronger mitigation measures are needed to abate the biological, visual, and health impacts that the proposed zoning changes outlined in the ADU-Draft EIS are projected to have on the urban forest and tree canopy.

As the City of Seattle drafts policy that seeks to increase urban density to accommodate more people and jobs, protecting and enhancing the City of Seattle's urban forest is more needed than ever. This is especially true in single-family neighborhoods as they account for over 63% of all tree canopy cover in Seattle (2016 LiDAR Study).

Underestimation of tree canopy loss:

The ADU-Draft EIS determined there will be less than a 0.1% decrease in the urban forest and tree canopy in single-family residential areas for both Alternative 2 and 3 compared to the No Action Alternative. The UFC disagrees with the methodology used in the ADU-Draft EIS for calculating this assessment for the following reasons:

1. The ADU-Draft EIS underestimates the impact on canopy cover of DADU and ADU construction. The ADU-Draft EIS only assumes tree loss based on an additional 390 DADUs constructed compared to the No Action scenario in the next 10 years (39 DADU built per year for the next 10 years). The study does not take into account impacts of the increase of 1,050 ADU on canopy cover, nor does it take into account the loss of canopy cover caused by increase in off-street parking. The study should include other impacts of ADU production such as building activity staging, creation of new access, and increase in voluntary off-street parking when understanding impact on tree loss.
2. The ADU-Draft EIS calculates a less than 0.1% decrease in tree canopy which would result in up to a 9-acre loss in tree canopy. While a 0.1% reduction in canopy does not seem to be high, assuming a typical tree canopy has a radius of 20', a 0.1% reduction in tree canopy would mean a loss of 300-400 trees. Citing tree canopy loss based on number and quality of trees that are lost would help to better understand the actual impacts of the ADU policy.

Mitigation Measures:

The ADU-Draft EIS assumes no significant unavoidable adverse impacts to the tree canopy have been identified and lists no mitigation measures that would help to avoid and minimize tree canopy loss. The UFC feels that mitigation measures should be included and strengthened.

1. The UFC recommends that ADU-Draft EIS require ADU permits to complete an enhanced site plan when going through permit to ensure production of ADU does not result in cutting down exceptional existing trees.
2. As noted in the Exhibit 3-20 of the D-EIS, Vancouver B.C. ADU policy indicates that DADUs “must be located to preserve existing trees. Relaxation for location, massing, and parking standards may be allowed in order to preserve and retain significant trees.” Similar mitigation measures should be considered for Seattle.
3. A healthy urban forest can have an outsized impact on reducing the impacts associated with increased development intensity, as trees (especially street trees) help to mitigate the visual impacts of density and create a more human-scaled environment. While the ADU-Draft EIS documents multiple negative aesthetic impacts associated with increased development intensity, the plan does not recommend any mitigation measures focused on increasing or improving the urban forest to mitigate aesthetic impacts of increased density.
4. The EIS Study does not take into account less stringent site plan requirements when permitting a DADU compared to constructing a new home that will negatively impact canopy cover. When applying for DADU construction, one needs to only file a basic site plan without noting existing trees instead of an enhanced site plan that is often required when constructing a new single-family home (SDCI Tip 103). The impact of less stringent permitting requirements for ADUs will make it easier for home-owners to cut down existing exceptional trees that otherwise would be flagged by the City as needing to be preserved.

The UFC recommends including stronger, more binding requirements to promote and improve tree coverage when ADUs are constructed. These recommendations could include but are not limited to the following:

1. Expand incentives and development standards to promote preservation of existing trees and planting of new trees on lots with ADUs.
2. Update the interim tree protection ordinance to track tree loss caused by ADU production and require permits to cut down any tree more than 6" in diameter.
3. Include in the D-EIS the Alternative 3 recommendation to decrease proposed FAR in single family zones which would have on tree retention.

The UFC believes these mitigation measures are warranted given the number of proposed cumulative impacts to tree canopy resulting from code changes related to development currently underway.

Sincerely,



Weston Brinkley, Chair



Craig Johnson

cc: Mayor Durkan, Council President Harrell, Councilmember Bagshaw, Councilmember Gonzalez, Councilmember Herbold, Councilmember Johnson, Councilmember Juarez, Councilmember Mosqueda, Councilmember Sawant, Jessica Finn Coven, Nathan Torgelson, Samuel Assefa, Michelle Caulfield, Aly Pennucci, Nicolas Welch, Mike Podowski, Maggie Glowacki, Chanda Emery, Urban Forestry Management Team, Urban Forestry Core Team, Sara Maxana, Spencer Williams, Susie Levy, Aaron Blumenthal, Peter Lindsay, Eric McConaghy, Yolanda Ho, Evan Philip

Sandra Pinto de Bader, Urban Forestry Commission Coordinator
City of Seattle, Office of Sustainability & Environment
PO Box 94729 Seattle, WA 98124-4729 Tel: 206-684-3194 Fax: 206-684-3013
www.seattle.gov/UrbanForestryCommission