

Seattle Urban Forestry Commission

Leif Fixen, Chair • Tom Early, Vice-Chair

Gordon Bradley • Donna Kostka • Richard Martin • Joanna Nelson de Flores • Jeff Reibman • Erik Rundell • Steve Zemke

June 10, 2015.

Gordon Clowers
Department of Planning and Development
700 5th Avenue, Suite 2000
Seattle, WA 98124

RE: Comments on the Draft EIS for the Seattle 2035 Comprehensive Plan

Dear Mr. Clowers,

The Seattle Urban Forestry Commission wishes to address the following concerns about the draft Environmental Impact Statement (EIS) for the Seattle 2035 Comprehensive Plan.

1. Impacts on the Urban Forest due to Increased Density

The draft EIS does not evaluate the impacts on Seattle's urban forest by adding 120,000 new residents, 115,000 new jobs, and 70,000 housing units to Seattle by 2035. Only one page's worth of print out of the approximately 400 pages is devoted to potential impacts on the urban forest and it basically says that there is no problem because we have the Urban Forest Stewardship Plan and provisions in SMC 25.11. It is the Commission's view that this is not accurate. The draft EIS provides no direct or detailed evaluation of the yearly or cumulative loss of urban forest canopy due to development and growth and the associated impacts on air pollution and human health, noise, storm water runoff, wildlife habitat, open space, or heat island effects.

The draft EIS on p 3.5-11 states: *"The Urban Forest Stewardship Plan's goal's and the implementing regulations in SMC 25.11 would apply to development that occurs under all EIS alternatives and would help to mitigate for the potential removal of all trees and reduction of canopy cover with future development. In this respect, the growth patterns examined under all alternatives would be able to be implemented while remaining consistent with the UFSP's goals."*

Unfortunately, there is no environmental analysis of the specific impacts or costs associated with canopy loss occurring during development. There is no analysis of how much canopy loss would occur and what the cost would be or who would pay for replacing canopy lost during development. The current City Comprehensive Plan calls for no net loss of canopy. If the City does not know how much canopy is being lost through development it cannot accurately assess whether it is meeting the no net loss goal let alone gaining canopy each year.

The Urban Forestry Commission addressed this issue on the need for more detailed data from DPD on tree loss in a letter adopted June 25, 2014.

<http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/ADOPTEDDPDReportingLetter062514.pdf>

The letter stated in part:

“The Commission has discussed several ideas to improve submittal documentation and final reporting for projects under DPD’s permitting.

- *Currently, the City, through OSE and the Urban Forestry Interdepartmental Team, keeps track of the number of trees planted and removed on public property every year. The Commission recommends tracking trees lost on private property undergoing development to assist in determining where we are gaining or losing trees and canopy. This would add information to the overall city canopy coverage assessment data. By knowing more about canopy trends on different types of land, we can better direct policy and programming to ensure we are on track to meet our 30% goal.*
- *What would help the City better understand what is happening with tree canopy protection and enhancement is to require that all development projects submit an Urban Forest Canopy Impact Assessment prior to any construction project being approved. The Urban Forest Canopy Impact Assessment would include a map of the property with the trees numbered, canopy area of trees drawn, and trees to be removed clearly labeled. Under current guidelines it would minimally require that all trees 6 inches DBH (diameter at breast height) or larger be inventoried on the property. The suggested data points required would be:*
 - *Species: speaks to size of canopy and amount of storm water benefit.*
 - *DBH: speaks to age of tree and canopy coverage.*
 - *Tree Height: speaks to canopy volume and amount of environmental benefit.*
 - *Canopy Width (area): speaks to canopy volume and amount of environmental benefit.*
 - *Tree Condition: speaks to overall forest health and environmental impacts.*
 - *Photographs of the trees on the parcel and adjacent properties.*
 - *Canopy coverage as a percent of area pre- and post-project development.*
- *Landscape Plan Requirements could include calculations for percent canopy coverage at 20 years and soils volume provided for each tree.*
- *The annual UFSP Progress Report to the Mayor and City Council could include canopy coverage for different development zones.*

Implementing some or all of these operational steps would greatly help to evaluate whether or not we are doing enough to reach our 30% canopy goal.”

2. Inadequate Tree Protection in Current Code

A second issue is that the Commission believes that the current tree protection ordinance in SMC 25.11 is inadequate to meet the goals of achieving a 30% canopy by 2037. It has so stated in several letters to the Seattle City Council and Mayor, including the letter dated July 15, 2014.

<http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/ADOPTEDDPDOrdinancetoCMBagshaw071514final.pdf>

In that letter the Commission stated:

“In 2009, City Council issued Resolution 31138 instructing “...the Department of Planning and Development to submit legislation by May 2010 to establish a comprehensive set of regulations and incentives to limit the removal of trees and promote the retention and addition of trees within the City of Seattle on both private and public property...”

We would like to reiterate the statement made in our August 2010 recommendation: Bold action, consistent with Resolution 31138, is needed to achieve Seattle’s tree canopy coverage goal of 30% by 2037. And because the majority of trees in Seattle are in residential property, an updated tree ordinance is key to implement the 2013 Urban Forest Stewardship Plan as adopted by City Council last September.

DPD released a first proposal in 2010 and a second proposal in 2012. It is now almost five years since the Resolution and DPD is still working on a tree ordinance for trees on private property. There was a significant amount of time and energy invested by the community in this process. This length of time tends to frustrate the public as they look for guidance on tree measures.

We urge you use your leadership in Council’s Seattle Public Utilities and Neighborhoods Committee to:

- 1. Encourage DPD to resume work on this important element of a comprehensive urban forestry strategy for Seattle with a more defined timeline than the one currently shown on their website.*
- 2. To develop an improved public education and outreach approach that engages Seattle’s diverse stakeholder communities.*
- 3. Require a reporting of how the new proposal addresses the DPD specific elements of the Resolution: a. The 15 elements of Section 1;*
- 4. b. The four elements of Section 2; and*
- 5. c. The section for requirements for institutions, City facilities, public facilities, and schools.”*

It is now another year later and there has been no further action on passing an updated tree ordinance.

3. Removal of the Current 40% Canopy Cover Long-Term, Aspirational Goal

The third issue the Commission is concerned with is that the Draft EIS said that the Seattle 2035 Comprehensive Plan would eliminate the City’s long-term goal of a 40% tree canopy in the current comprehensive plan and replace it with the Urban Forest Stewardship Plan goal of 30% by 2037.

That seems to be the intent of the language on p 3.5-1 that says “*Adjusting the quantitative tree canopy goal in the Environment Element to be consistent with the 2013 Urban Forest Stewardship Plan.*” That would reduce the current overall long-term goal of 40% in the Comprehensive Plan by 25%. There is no discussion of the impact of that change both in the short-term or long-term and the ability to pursue a 40% aspirational goal after 2035. A long-term goal of 40% canopy cover and a 2035 goal of 30% canopy by 2037 is a step toward that larger goal.

The Commission addressed the issue of the long-term canopy goal of 40% in its comments on the current Comprehensive Plan in a letter dated May 11, 2011.

<http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/AdoptedCompPlanUpdateRecommendation051111.pdf>

The language proposed by the Commission was adopted by the Seattle City Council and is in the current Comprehensive Plan under ENVIRONMENT ELEMENT H Seattle’s trees E23: “*Achieve no net loss of tree canopy coverage, and strive to increase tree canopy coverage to 40 percent, to reduce storm runoff, absorb air pollutants, reduce noise, stabilize soil, provide habitat, and mitigate the heat island effect of developed areas.*”

4. **Additional comments**

- The 2013 Urban Forestry Stewardship Plan is not listed in the references.
http://clerk.seattle.gov/public/meetingrecords/2013/plus20130911_18d.pdf
- The benefits of trees mentioned on p 3.5-11 under the heading Urban Forestry Stewardship Plan fails to mention a number accepted benefits of trees including documented health benefits of a healthy urban forest; reducing storm water runoff; impacts on wildlife habitat; and impacts on birds, insects, other animals and associated plants.

In summary, the Commission believes that the draft EIS does not address a number of impacts that could be caused by the different growth scenarios as a result of tree canopy loss from increased development. Much more analysis is given to view impacts and noise impacts while ignoring potential significant impacts caused by increased tree canopy loss.

SMC 25.11 is seriously outdated and needs updating like many other cities including Portland, Oregon; Lake Forest Park, WA; Atlanta, GA; and Vancouver, BC have done to protect and increase their green urban forestry infrastructure. So called protection of exceptional trees under SMC 25.11 is based on a complaint system and is unfortunately not protecting exceptional trees.

The Urban Forest Stewardship Plan cannot address reaching a 30% canopy goal without adequate information as to the amount of canopy that is being lost during development. The Commission recommended DPD to implement an Urban Forestry Canopy Impact

Assessment for all their projects and so far has not responded to the Commission's letter of recommendation or indicated any intention to do so.

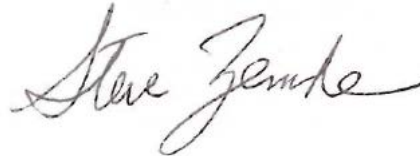
And eliminating by oblique reference the long-term, aspirational canopy goal of 40% as adopted by the Seattle City Council in the current Comprehensive Plan without any discussion of its impact on Seattle's future urban forest is unacceptable. The long term 40% canopy goal should remain in the plan and reference that the 30% goal by 2037 is a stepping stone to the larger goal and not the final goal.

Thank you, for the opportunity to comment.

Sincerely,



Leif Fixen, Chair



Steve Zemke

cc: Mayor Edward B. Murray, Council President Burgess, Councilmember Bagshaw, Councilmember Godden, Councilmember Harrell, Councilmember Licata, Councilmember Okamoto, Councilmember Rasmussen, Councilmember O'Brien, Councilmember Sawant, Jessica Finn Coven, Diane Sugimura, Brennon Staley, Eric McConaghy.

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