

## 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)

August 1, 2018.

Councilmember Rob Johnson, Chair  
Select Committee on Citywide Mandatory Housing Affordability  
City Hall  
600 4<sup>th</sup> Ave  
Seattle, WA 98124

Re: Proposed Mandatory Housing Affordability (MHA) Ordinance

Dear Councilmember Johnson,

The Seattle Urban Forestry Commission (UFC) has reviewed the proposed changes to Chapter 23.44 of the Seattle Municipal Code as related to the Mandatory Housing Affordability (MHA) Ordinance and the accompanying Director's Rule related to the Seattle Green Factor. The UFC appreciates that City staff took into account comments made on the Green Factor multipliers that were provided in the [MHA DEIS Letter dated May 2, 2017](#) as they related to existing tree retention and tree planting. However, the UFC is concerned that the proposed changes do not go far enough to promote the retention of the City's existing tree canopy or to increase tree canopy in the areas affected by the ordinance.

The UFC, therefore, recommends revising Table A for 23.86.019 to establish a hierarchy within the multipliers to further encourage planting of medium/large trees and preservation of existing trees. In this way, non-vegetation options would have the least credit and preservation of existing trees would have the highest credit followed by planting medium/large trees. For example, reduce the multiplier for small trees and small/medium trees so that it can be increased for medium/large and large trees.

Item "F" should be expanded to include not just structural soils, but also other emerging technologies to provide sufficient soil volume and depth, such as soil cells, for successful establishment and long-term health of newly planted trees.

The UFC is also concerned about tree loss (especially conifers) in single family zones due to development. For Section 23.44.020 - Tree Requirements for SF5000, SF7200 and SF9600 zones, and Residential Small Lot (RSL) zones, the UFC recommends:

1. Focusing on the tree species and size at maturity (or in 10 years) to determine tree planting requirements for a site to encourage evergreens and the largest canopy tree as appropriate for the site's constraints. Tree caliper should only be required as a standard for selecting right nursery stock.

2. Modifying Table A for RSL Zones to increase the points for medium/large trees and for preservation of trees at least six inches in diameter.

The UFC acknowledges that a draft ordinance to update tree regulations is currently being worked on by City Council which might change the Green Factor ordinance. However, the UFC would like to go on the record providing input to the current MHA ordinance draft.

The UFC would also appreciate being involved as this process moves forward.

Sincerely,



Weston Brinkley, Chair



Sandra Whiting

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, Mike Podowski, Maggie Glowacki, Brennon Staley, Vera Gianpietro, Chanda Emery, Urban Forestry Management Team, Urban Forestry Core Team, Sara Maxana, Susie Levy, Amy Gore, Aaron Blumenthal, Peter Lindsay, Eric McConaghy, 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](http://www.seattle.gov/UrbanForestryCommission)