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**DRAFT**

[7/56/14/20177/10/2017](#)

*RE: Urban Forestry Commission (UFC) ~~Response comments~~ to the Citywide  
Implementation of Mandatory Housing Affordability (MHA) Draft Environmental Impact  
Statement (EIS)*

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The Urban Forestry Commission commends the MHA-Draft EIS for citing the importance of tree coverage for the City of Seattle, [specifically](#) ~~and~~ citing the goals outlined in the 2013 Urban Forest Stewardship Plan as well as incorporating the most recently published 2016 canopy cover assessment [results](#).

The Urban Forestry Commission disagrees with the MHA-Draft EIS determination of no significant ~~unavoidable adverse~~ impacts to the tree canopy ~~reduction~~ for the following reasons:

- 1) MHA-Draft EIS underestimated tree canopy reduction from MHA policy
- 2) Stronger mitigation measures are needed to abate the biological, ~~and~~ visual and health impacts that the proposed zoning changes outlined in the MHA-Draft EIS ~~is 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 [to abate the biological, ~~and~~ visual and health impacts of this measure](#).

**Underestimation of tree canopy:**

The MHA-Draft EIS ~~determined-states that~~ there will be less than a 0.5% decrease in the ~~urban forest and~~ tree canopy for both Alternative 2 and 3 compared to the No Action Alternative. The UFC disagrees with the methodology used in the MHA-Draft EIS for calculating this assessment for the following reasons:

1. The MHA-Draft EIS ~~assumes-states;~~ ~~“that tree cover for a given zone was assumed to remain constant over time if the zoning designation stayed the same-Tree cover for a given zone was assumed to remain constant over time if the zoning designation stayed the same.”~~ [\[page 374\]](#) ~~UFC-The Commission~~ recommends that the MHA-Draft EIS study should account for ~~an some~~ increase in loss in tree canopy for zones that stay the same. MHA-R will likely ~~incentive-incentivize~~ developers to maximize gross floor area (GFA) on a redevelopment site, and one way a

developer can maximize GFA is to develop ~~more of the site~~ to the highest and best use. MHA-R Draft EIS does not take the change to highest and best use of the lot into account ~~when the impact when~~ calculating tree canopy reduction. We suggest calculating tree canopy reduction using the highest and best use of each lot even if the zoning is not changing within MHA areas.

2. The MHA Draft EIS calculates that 0.5% decrease in tree canopy would result in ~~up to 115-16 acre loss in tree canopy, but does not take analyze the quality and character of tree coverage that could decrease associated with alternatives 2 and 3.~~ While a 0.5% reduction in canopy does not seem to be a high percentage, it would generically equate to a loss of 173-555 trees, assuming a typical tree canopy has a radius of 20'20 feet (1,256 square feet), ~~a 0.5% reduction in tree canopy would mean that the MHA-R could result in a loss of 381-554 trees.~~ Citing tree canopy loss ~~based using an estimated~~ number and quality of trees that are lost/destroyed would help to better understand and relate the likely actual impacts of the MHA policy to the neighborhood tree canopy. Additionally, we believe that a loss of this many trees should be considered a significant impact for alternatives 2 and 3.
- 2.

**Commented [t1]:** Removing quality because I do not expect a planner writing a draft EIS to have data available to characterize the quality of the trees potentially removed under alternatives 2 and 3.

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#### **Mitigation Measures:**

The MHA-Draft EIS assumes no significant unavoidable adverse impacts to the tree canopy have been identified, but does list some Mitigation Measures that would help to avoid and minimize tree canopy loss. The UFC Commission feels that Mitigation Measures should be expanded and strengthened.

1. Mitigation measures for tree canopy loss should deal with changing or updating existing regulations and not just recommending evaluation of future policy. The MHA Draft EIS recommends the City evaluate future urban forestry policies as part of the 2018 Urban Forest Stewardship Plan (UFSP), but does not cite mitigation measures for existing policies such as updating Seattle tree protection code, Seattle Green Factor guidelines, or the Seattle Street Tree Manual.
2. 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 MHA-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 density.

The UFC recommends including stronger, more binding requirements to promote and improve tree coverage in urban village areas. These recommendations could include but are not limited to the following:

1. Expand incentives and development standards to promote street trees in Urban Villages.
2. Update the interim tree protection ordinance to account for the impact of MHA-R and its impact on development.

- 3. Reduce conflict between power lines and street trees.
- 4. Modify the Seattle Green Factor guidelines to give higher criteria to preserving existing site vegetation.

Sincerely,

Urban Forestry Commission