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December 9, 2020.

Seattle Urban Forestry Core Team
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Re: Comments to the 2020 Draft UFMP

Dear Urban Forestry Core Team,

The Urban Forestry Commission (UFC) appreciates your work on developing an updated Urban Forest Management Plan (Plan) for the City of Seattle. The UFC applauds the focus on equity and actionable structure of this plan.

The UFC makes the following comments on the Plan:

I. The UFC feels that updating the tree protection ordinance is one of the key pieces of work the City needs to continue moving forward. Given that the majority of the land is residential private property, and that the most of Seattle's tree canopy is located in residential areas, there should be more emphasis on getting this work done. The current draft Plan doesn't mention this effort until Chapter 3. Mention of this work, including the consideration of instituting a tree removal permit and a payment-in-lieu tool for mitigation of tree loss should be done earlier or included in an Executive Summary that is part of the main document. After all, key potential elements of a new ordinance have been specifically called out by the Mayor and Council in Executive Order 2017-11 and Resolution 31902. See UFC recommendations on Action Agenda #18 below (see page 4).

II. The narrative around the urban forest is often that of "trees vs."—trees vs. density, trees vs. freight, trees vs. views, to name a few. The draft Plan supports these narratives, devoting significant space to challenges in urban forest management and to the City's competing priorities. For example, on page 15, the Plan states:

"Accommodating trees in urban areas pose additional issues. Seattle is expected to grow by 70,000 new households and 110,000 jobs from 2015 to 2035. If we don't build new homes to accommodate this demand, Seattle will increasingly become a city for the wealthy and push new development to the peripheries of a region, driving deforestation."

The UFC feels that statements like this are misleading at best and reinforce the false dichotomy of "trees vs." Increased housing supply does not necessarily mean improved housing affordability. Density can be increased without razing a lot. And developers should be expected to respect the natural features of a site and to design for maximum tree retention.

With the city's forecasted growth and anticipated climate impacts, tree retention and protection should be the norm. The language in the Plan should reflect that. The UFC encourages the Urban Forestry Core Team to review the draft for statements that seem to pit trees against other priorities and ask "Is that true? Are there more positive, constructive ways to communicate the issue?"

III. The UFC recommends continuing to use the term "environmental Justice priority communities" but adding "with an emphasis on Black, Indigenous, and People of Color (BIPOC) communities" throughout the document.

IV. Additionally, the UFC suggests the following specific changes to the Plan:

1. Incentives identified on the draft Plan page 27 include stormwater rates. However, the text references only land cover, which may be jargon for the Plan's public audience. **The UFC recommends explicitly mentioning trees** as an opportunity to clearly connect our urban forests and the stormwater benefits they provide.

2. On page 28, the draft Plan enumerates positive statements for the future urban forest. Since these statements do not follow the SMART formulation typical of goals in management or strategic plans, the UFC recommends against calling them "goals." The UFC suggests restructuring the statements to read as a list of vision statements, desired outcomes, or values.

    Additionally, the list on page 28 in the draft Plan does not contain a statement regarding the City's vision for the heath and extent of the urban forest itself. The UFC recommends expressing the City's vision that explicitly points to a commitment to a heathy, diverse, and expanding urban forest. For example, "Trees in Seattle's urban forest are of diverse species and ages and both the urban forest's canopy cover and canopy volume are expanding in all management units across the city."

    The UFC expresses its concern about setting "Balancing competing priorities" as a goal in the Plan. While the UFC recognizes that urban forest management exists within the larger context of development, utility provision, public safety, etc., and that competing demands must be balanced, the UFC believes that this plan should be advocating for tree protection as part of ongoing efforts to find creative solutions. The UFC would like to propose adding the following language to the beginning of Goal 6: *The City will grow, maintain, preserve, enhance, and restore its urban forest as it meets other priorities.*

3. The UFC recommends rephrasing the strategies on page 29 to be more specific and actionable. Specific recommendations include:
   - Strategy Number 2:
     Current: "Prepare for climate impacts and build a resilient urban forest."
     Suggestion: "Evaluate potential climate change impacts and identify forest management actions that increase the urban forest's resilience (or adaptive capacity) to those impacts."
   - Strategy Number 3:
     Current: "Understand the condition and complexity of the urban forest as a resource, how it was different in the past, and how it may change in the future."
     Suggestion: "Support research that evaluates the condition and complexity of the urban forest over time to better understand historical changes and potential future trajectory."
   - Strategy Number 7:
     Current: "Regulate and provide support to the community for keeping, removing, replacing, and planting trees."
     Suggested: "Strengthen, fund, and enforce tree regulations on private property and support the community for keeping, removing, replacing, and planting trees."

4. The UFC is encouraged by the City's commitment to core urban forest efforts (outlined on page 30):
   - Planting trees throughout Seattle and complying with the City's Two-for-One tree replacement policy.
   - Developing plans and strategies to manage the urban forest on City natural landscapes and properties.
   - Removing invasive plants from Seattle's forested areas.
   - Coordinating departmental work and collaborating on urban forestry citywide efforts.
   - Updating initiatives and regulations in support of Seattle's urban forest.

   The UFC sees these activities as critical and would **suggest emphasizing them within the Plan** more than their current presentation. Perhaps as part of Chapter 3, these items could be introduced as established and ongoing. They could be later reiterated as separate from the Action Agenda, which is a suite of aspirational actions identified through this planning process. In addition, the UFC recommends providing links to annual reports in this section to support ongoing urban forestry work.

5. The UFC makes the following comments on the Plan's Action Agenda, pages 31-32:
   - Strategy 1. Add action: "Identify barriers to tree planting and maintenance in environmental equity priority communities and develop policies to address those barriers."
   - Strategy 2, Action #5. Replace "vulnerability assessment" with "vulnerability assessment and adaptation plan" and consider replacing the word "resiliency" with "adaptive capacity."
   - Strategy 3. Add action: "Track tree loss and replacement on public and private lands." This is a key component for monitoring, evaluating, and reporting progress of the Plan. The UFC recommends developing a database to track trees planted by City

departments across Seattle (a listed Key Activity Metric on page 35), trees installed as part of permitted development projects, and trees permitted for removal.

- Strategy 5. The UFC agrees that the City should improve communication with BIPOC communities regarding urban forestry. Broader awareness is also needed. The UFC suggests evaluating communications approaches that specifically address the need of environmental equity groups, and that reach broad audiences.
- Strategy 7, Action #15. The UFC recommends a more actionable formulation. Rather than "Explore ways to help property owners remove invasive plants and pests on private land," consider, "Develop strategies to help property owners remove invasive plants and pests on private land either through developing new programs or volunteer opportunities or by communicating existing resources and programs."
- Strategy 7, Action #18. Mayor and Council have repeatedly stated (in numerous "Whereas") that the majority of Seattle's urban trees are located on private property (specifically in residential areas). The UFC has also stated numerous times that tree management on private property is the largest threat *and* opportunity our urban forest faces. Therefore, the UFC would **recommend emphasizing the associated action,** *Update the City's tree protection regulations,* bolding it and moving it up to the top Action Item for Strategy 7. As identified in the Plan, "67% of the land is residential and represents 72% of our canopy. Effective protection for trees on private property is a key element of our citywide strategy to keep Seattle livable especially as we continue to grow." Continue creating strategies that support increased density in our residential areas (vs. increased home size) while protecting our urban trees and in some cases increasing canopy cover (such as with multi-family development in South Lake Union).
- The UFC recommends re-establishing a growth target for Seattle's urban forest once a canopy cover trend over time is established. To that effect, the UFC recommends the City commit to performing acquiring Lidar data to perform another canopy cover assessment within the next two years.

6. Key Activity Metrics on page 35 include # of trees planted throughout Seattle by City departments. The UFC recommends adding tracking tree loss and tree removal across the city. These data will be necessary for effective monitoring, evaluation, and reporting on progress of the Plan.

7. The UFC applauds the use of varied and diverse metrics as part of the Performance Indicators. As previously identified by the City and the UFC, available data is a central hurdle to improved forest management in the city. While the percent canopy cover has served as a useful tool, the ability to include other metrics will allow for a more data and more flexible understanding of a diverse forest landscape. As previously identified, **the UFC would encourage the consideration of a canopy volume metric,** as opposed to just using canopy coverage.

8. Canopy connectivity is suggested as a quantitative indicator on page 35 with the description, "Urban forest contains a significant amount of continuous habitat for various types of wildlife." The UFC suggests complementing this course-level indicator with bird and other wildlife monitoring to assess how connectivity actually supports wildlife.

9. The future research question "Understand how planting trees and improving the urban forest may lead to gentrification and displacement," will be a difficult question to answer.

Disentangling the impacts of trees from other drivers of gentrification would be extremely challenging. The UFC wonders if it might be better to ask how environmental equity priority communities view this issue and to identify strategies that support a desire for trees in underserved communities while accommodating concerns residents have about gentrification.

The UFC, again, thanks the Urban Forestry Core Team for their work and partnership on this work.

The UFC will be providing ongoing input as part of Council's outreach and engagement process on the plan update.

Sincerely,

Weston Brinkley, Chair   Joshua Morris

cc: Mayor Jenny A. Durkan, Council President Lorena González, CM Lisa Herbold, CM Debora Juarez, CM Andrew Lewis, CM Tammy Morales, CM Teresa Mosqueda, CM Alex Pedersen, CM Kshama Sawant, CM Dan Strauss, Jessica Finn Coven, Michelle Caulfield, Urban Forestry Management Team, Yolanda Ho, Austin Miller

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5