

Seattle Urban Forestry Commission

Elizabetha Stacishin-Moura, Chair • Matt Mega, Vice Chair • Nancy Bird • Gordon Bradley
John Hushagen • Kirk Prindle • Jeff Reibman • John Small • Peg Staeheli

June 3, 2010

Honorable Councilmember O'Brien
Seattle City Council
PO Box 34025
Seattle, WA 98124-4025

Re: Proposed Multifamily Code Changes to Lowrise Zones and Green Factor

Dear Councilmember O'Brien,

In response to your request, the Urban Forestry Commission has completed an initial review of the proposed changes to the Multifamily Code and the Green Factor. As a follow up to the draft response we sent you on May 20th 2010, we now present this updated letter which has been reviewed by the full commission and was approved by unanimous vote on June 2, 2010.

We would like to first answer your two questions specifically, and then offer some additional thoughts. Most importantly we would like to note that encouraging the preservation of existing trees is one of the most important goals of the Urban Forestry Commission, but tree preservation alone is not enough to meet the city's canopy coverage goals. Preservation must go hand in hand with mechanisms that promote tree planting and proper maintenance. Many elements - including the Land Use Code, the upcoming Tree Protection Ordinance, the Storm Water Manual, the Green Factor, Street Improvement Standards, and city Design Guidelines - must work together in an integrated fashion in order for the city to achieve the 30% target for canopy coverage.

- 1) How effective is the Green Factor as a tool for preserving trees in low-rise multifamily zones?

The clear answer to your question is that the Green Factor was not originally designed to be a primary tool in the preservation of existing trees. The proposed modifications to the Green Factor for low-rise zones will elevate tree preservation to the highest-value item in the calculations. We support this change and believe it better reflects the ecological value of protecting existing trees. However, this still does not make the Green Factor a key tool for saving trees. Because it is flexible by design, Green Factor requirements can be met in a variety of ways. In hypothetical development scenarios, we have found that meeting the proposed Green Factor of .6 for the L zones is not difficult. Therefore, the decision whether to remove or save an existing tree will be driven by other factors such as cost and convenience.

- 2) Do you recommend any additional policies for the preservation of significant trees in ways that do not deter good development in low-rise multifamily zones? For example are there other incentives or benefits that could be offered in exchange for the preservations of trees.

We would like to propose several ideas to encourage preservation and planting of trees in the low-rise zones through the Green Factor and the proposed Multi-Family Code.

Options to make the Green Factor more effective in preserving trees and promoting the city's canopy coverage goals:

- Add a tree canopy calculation and a bonus multiplier for projects that achieve the canopy coverage goal for their zone.
- Customize the application of the Green Factor by zone. For example, in the low-rise zones the use of vertical green walls should be limited to encourage saving and planting more trees.
- Introduce negative points for the removal of significant trees.
- Create additional credit for adequate root zone protection so that trees can reach full maturity.
- Create a higher value or bonus system for evergreen trees.

Changes to the Proposed Multifamily Code for low-rise zones to encourage tree preservation and planting:

- Codify the specific design flexibilities available to preserve exceptional trees during development and eliminate the requirement for administrative design review. The administrative design review process becomes a disincentive for tree protection because it's time consuming, costly and unpredictable.
- Expand design flexibility as much as possible. For example, allowing greater variety of roof forms within the 5' roof height allowance when a significant tree is retained would enable upper stories to be used more effectively to recover lost square footage.
- Enlarge the minimum dimensions of the required amenity area to provide adequate space for tree planting.
- Ensure that preserved trees are properly protected during development and given enough root area to continue to thrive long term.

Finally, we would also like to offer the following general thoughts and recommendations for you to consider.

- The regulation and management of trees in the city is highly fragmented. Any opportunity to make these pieces more integrated and holistic should be considered.
- Canopy coverage goals and the Urban Forest management plan do not seem to be consistently considered by decision makers. Elevating awareness of the Urban Forestry Plan and goals will help bring them into relevant discussions.

- Increasing higher-density multifamily zones makes it necessary that bigger, quality green space be provided to facilitate an increase in canopy cover in those areas.
- The creation of a mitigation fund which can be used for tree planting. Mitigation should be required when an exceptional tree cannot be preserved after all possible options within the code have been explored.
- Preservation and planting should consider the long term viability of the tree (e.g. a tree too close to infrastructure may have to be removed as the tree matures, planting too close together will likely result in later tree removal).
- In regards to sustainability and ecological function, the preservation of existing mature trees is far superior to re-planting. While newly planted trees take decades to mature, existing mature trees already provide significant benefits in terms of storm water management, noise attenuation, wildlife habitat, climate change, aesthetics, air quality, heat island mitigation, shading, and general issues of livability.
- Removing existing mature trees and replanting with small specimens requires significant energy expenditures and eliminates ecological benefits that may never be recouped unless young plantings are protected through many years, decades, even centuries.
- Land use policy in general should encourage site design solutions that are responsive to existing conditions, including the preservation of existing trees.

Thank you for your interest in tree preservation. We look forward to continuing to work together to achieve the city's tree canopy coverage goals. Please do not hesitate to engage the Urban Forestry Commission in any issue you believe could have an impact on this work.

Sincerely,



Elizabeta Stacishin-Moura, Chair
Seattle Urban Forestry Commission

cc: Diane Sugimura, Marshall Foster, Brennon Staley, Councilmember Bagshaw, Councilmember Burgess, Councilmember Clark, Councilmember Conlin, Councilmember Godden, Councilmember Harrell, Councilmember Licata, Councilmember Rasmussen, Michael Jenkins