

Urban Forestry Commission

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Date: September 15, 2025

To: Councilmember Joy Hollingsworth, Councilmember Mark Solomon, Councilmember Dan Strauss, Councilmember Robert Kettle, Councilmember Debora Juarez, Council President Sara Nelson, Councilmember Alexis Mercedes Rinck, Councilmember Maritza Rivera, and Councilmember Rob Saka

CC: Mayor Bruce Harrell, Interim Director Michelle Caulfield, Director Rico Quirindongo, Interim Director Kye Lee, Central Staff Director Ben Noble, Long Range Planning Manager Michael Hubner, and Strategic Advisor on Housing and Development Brennon Staley

From: Urban Forestry Commission

Subject: Urban Forestry Commission's Recommendations related to Seattle City Council's Tree-related Policy Amendments

Dear Seattle City Council Select Committee on the Comprehensive Plan,

Thank you for your work to advance policies that increase Seattle's housing density while also considering the impacts on our urban forest. The Urban Forestry Commission supports Council's intent with these amendments to increase housing and urban canopy and recognizes the challenges in balancing these goals.

However, the UFC cannot confidently support individual amendments that modify code at this time, as we have not had adequate opportunity to fully evaluate their potential impacts on the urban forest and permit review processes. Moving these amendments forward without in-depth analysis risks creating unintended consequences that undermine both housing and tree canopy goals. We strongly urge the Council to allow adequate time for review and modeling of intended changes to ensure amendments are complete, workable, and aligned with Seattle's goal of 30% canopy by 2037.

We emphasize the need for earlier and more direct collaboration between Councilmembers and the Commission on future amendments. Engaging us at the outset will allow us to be briefed, review impacts, and ultimately, submit timely, informed recommendations on tree-related policies under consideration.

UFC Review of Council Amendments

The UFC supports two amendments, 26 and 28, which add policy language to the Climate and Environment Element of the Comprehensive Plan to emphasize biodiversity and provide policy direction for sustainable management of open space and vegetation. These two Comprehensive Plan Policy additions do not modify code and provide general direction and communicate values that the UFC supports.

Several amendments submitted by Councilmembers aim to address policy goals we have named in our prior Comprehensive Plan recommendations ([2024](#) and [2025](#)). The UFC would welcome the opportunity to help craft a holistic plan around trees to ensure these policy goals are fully integrated and effective over the long term. Below, we note these policy goals and reference amendments aimed at addressing them. However, as noted above, we cannot support individual amendments that modify code without more time to fully evaluate their potential impacts on the City of Seattle's urban forestry goals and permit review processes.

Policy goal 1. Stronger requirements and flexibility for design standards when developing on sites with existing Tier 2 and Tier 3 trees.

Implementing stronger standards for retaining Tier 2 and Tier 3 trees, when feasible and providing similar use of the property, is essential to citywide tree equity and meeting citywide canopy goals. Code should ensure trees are considered early in design and that applicants can meet requirements without undue time or cost, with setback flexibility provided to support both development and tree preservation.

In addition, retained trees should be in good condition and protected during and after construction, with clear standards for adequate protection areas and soil volume that sustain long-term tree health. It is vital that language around tree protection standards is clear and provides flexibility based on arborists expertise and best management practices.

We appreciate that amendments 93, 102, 104 aim to address these issues, however, we cannot support individual amendments at this time, because we have not had adequate time to fully evaluate how the specific language may impact city-wide urban forestry goals and permit review processes.

Policy goal 2. Integrating tree retention bonuses with emphasis on stacked flats

We support bonuses for Floor Area Ratios (FAR) on developments that effectively preserve any number of viable Tier 1, Tier 2 and Tier 3 trees. Since stacked flats can offer more room for new and existing trees, we support higher bonuses for this housing type or other housing typologies and configurations that enable greater tree retention.

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We appreciate that amendments 91, 92, and 94 aim to address these issues, however, we cannot support individual amendments at this time, because we have not had adequate time to fully evaluate how the specific language may impact city-wide urban forestry goals and permit review processes.

Policy goal 3. Parking waivers for Tier 2 and Tier 3 trees

The Urban Forestry Commission supports the issuance of parking waivers when they are requested to retain Tier 2 and Tier 3 trees with automatic approval to reduce uncertainties in the permit process.

We appreciate that amendments 87 and 101 aim to address these issues, however, we cannot support individual amendments at this time, because we have not had adequate time to fully evaluate how the specific language may impact city-wide urban forestry goals and permit review processes.

The UFC stands ready to work with Council and the Executive to provide input on policies that support both urban canopy and housing. We would welcome the opportunity to be briefed, review impacts, and ultimately, submit timely, informed recommendations on tree-related policies under consideration to ensure proposed code changes are complete, workable, and aligned with Seattle's goal of 30% canopy by 2037.

Sincerely,



Drue Epping, Chair
Arborist, Position 5
Urban Forestry Commission