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August 17, 2022

RE: Urban Forestry Commission comments on 2024 Comprehensive Plan EIS Scoping Alternatives

Dear Office of Planning and Community Development,

The Urban Forestry Commission (UFC) has identified the 2024 Comprehensive Planning update process as a key priority for commission engagement and input. The UFC is grateful for your early engagement and is looking forward to active involvement in this work.

Seattle's urban forest plays important roles in our city's ecology, economy, climate resiliency, and the health and wellbeing of people who live, work, and play here. Ensuring the urban forest is healthy, growing, and equitably distributed are critical aspects for meeting the City's racial and social justice and sustainability goals.

Since urban forestry requires long planning horizons, trees must be a clear feature in our vision for future growth and development. The UFC recommends that urban forestry and related themes be a central element in the Comprehensive Plan EIS process, with explicit goals integrated throughout the final plan.

Our recommendations pertaining to the EIS process and analysis are as follows, elaborated further below:

1. Analyze the impact of all growth strategies on the urban forest.
2. Determine if equity concerns disqualify certain alternatives from serious consideration.
3. Include an alternative that is even more expansive than Alternative 5.
4. Study how EcoDistrict planning can support low-carbon, climate-adapted growth and economic development goals. Invite Michael Eliason of Larch Labs to present on alternative land use and urban forest planning initiatives.
5. Consider a greater diversity of housing types in development planning, including social housing, co-ops, etc.
6. Include industrial and major institutions land use types in analyses.
7. Add additional biodiversity and climate impact considerations to Council's request in Resolution 32059.

(1) Analyze the impact of all growth strategies on the urban forest

The EIS analysis for each alternative should examine impacts to our urban forest, including existing trees and the potential for new trees. The UFC recommends following Barron, Sheppard & Cordon's (2016) performance indicators: physical access to nature, canopy cover, stormwater control, habitat provision, air quality improvement, visual access to nature, available growing spaces, and greenhouse gas sequestration as key performance indicators. The UFC also recommends assessing how each alternative could impact or enhance connectivity between parks and natural areas. Connectivity should be considered for birds, pollinators, and people.

(2) Determine if equity concerns disqualify certain alternatives from serious consideration. Alternative 4, for example ("corridor") would focus new development along corridors with frequent transportation. This could concentrate noise and pollution burdens on those who live along the corridors. The UFC asks the City to submit the alternatives to an initial "equity check." If an alternative cannot clear initial scrutiny, it may not be worth the resources to analyze them in depth.

(3) Include an alternative that is even more expansive than Alternative 5. Many residents are calling for a strategy that opens all zones to higher density development, including multifamily zoning everywhere, high rises in urban villages, and light industrial and commercial in residential zones. See for example, Alli Rico's comment. The City needs to explore all options available to address the housing crisis. The UFC supports examining how less restrictive land use regulations could impact housing affordability, job creation, the urban forest, and wildlife habitat.

(4) Study EcoDistrict planning models. The UFC recommends analyzing how EcoDistricts / park-oriented, high-density development containing a diversity of housing types, including social housing, co-ops, market-rate housing and more, can be deployed in Seattle to promote diversity in housing, affordability and low-carbon living. The UFC recommends the Seattle Planning Commission and City Council Land Use Subcommittee invite Michael Eliason of Larch Labs to present on alternative land use and urban forest planning initiatives. These urban development strategies have been tested globally and provide compelling case studies for dense, livable communities with reduced needs for cars and a prioritization on the human experience.

(5) Consider a larger diversity of place types.
In addition to urban centers, urban villages, smaller nodes, corridors, and neighborhood residential areas, the UFC recommends including industrial zones and major institutional overlays in analyses.

(6) Consider a greater diversity of housing choices

The alternatives mention triplexes, fourplexes, townhouses, apartments, and commercial spaces. The UFC suggests expanding the consideration of housing types to also include high rises, co-ops, social housing, multifamily homes, ADUs and DADUs, tiny homes and more.

(7) The UFC Supports Council's Resolution 32059 prioritizing resilience

The UFC commends City Council for adopting Resolution 32059, committing to address climate change and improve resilience as part of the One Seattle update to the Comprehensive Plan. The Commission supports the resolution and seconds its call to specifically develop new or revised goals to reduce greenhouse gas emissions, foster resilience, and work toward environmental justice in Seattle. The UFC offers to be a resource and partner to help develop policies and ideas for improving resilience of natural areas, enhancing tree canopy, identifying natural areas and infrastructure that may be vulnerable to changing environmental conditions, and more. The UFC's key overarching additions to Resolution 32059's goals and considerations are to:

- Call out the need to study the potential impacts of new and more deleterious pests and pathogens as a climate-related impact. For example, the emerald ash borer is an insect that infests trees in the genus *Fraxinus*. It has already killed tens of millions of trees in 30 US states. In July 2022, the emerald ash borer was found in a city near Portland, Oregon. Seattle's Pest Readiness team is preparing for its arrival in our city. Fewer days of extreme cold due to climate change will allow the emerald ash borer and other pests to move further north or be active longer. More pests and pathogens will come. The future of our urban forest depends on our ability to be ready.
- Explicitly name "holistic urban biodiversity management" as a goal. Maintaining biodiversity is key to maintaining long-term ecosystem services and function (Oliver et al. 2015). Yet we tend to manage parks, natural areas, street trees, wildlife, a small number of species (e.g., Great Blue Herons), and other natural assets discretely. Further, biodiversity conservation and climate change mitigation need to be more consciously coupled (Roberts, O'Leary & Hawkins 2020) The two crises are related and can create feedback loops that exacerbate or complement each other.

The UFC makes the following additions to Council's resolution, with **UFC recommended additions in bold**:

> *Section 1. As part of the One Seattle update to the Comprehensive Plan, it is the City's intent to address greenhouse gas emissions reductions, climate resiliency and adaptation, and environmental justice. City staff is directed to study and develop new and revised goals and policies founded in science that include, but are not limited to, the following:*
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> > *A. Reducing overall greenhouse gas emissions, and other harmful pollutants that exacerbate climate impacts, including:*

1. *Reducing per capita vehicle miles traveled within the city limits of Seattle;*
2. *Increasing the amount and diversity of housing and providing amenities near housing to reduce dependence on cars;*
3. *Planning for future transportation investments to equitably meet forecasted multimodal transportation demands across the city,* ***including safe walking and biking routes****; and*
4. *Updating level of service standards for all locally owned arterials, transit routes, and active transportation facilities.*
5. ***Assessing where street parking can strategically be converted to plantable space for trees to reduce climate impacts and promote tree equity.***

B. Fostering the resilience of natural and human systems to climate impacts and natural hazards, including:

1. *Enhancing the resilience of existing natural areas, including wetlands, riparian areas, and vital habitat for safe passage and species migration;*
2. *Increasing resilience against natural hazards created or aggravated by climate change, including sea-level rise, landslides, flooding, drought, heat, smoke, wildfire,* ***pests and pathogens,*** *and other effects of changes to temperature and precipitation patterns;*
3. *Leveraging investments in natural and "gray" infrastructure to increase climate resiliency and provide co-benefits, such as stormwater management, salmon recovery, and other ecosystem services; and*
4. *Enhancing tree canopy to reduce airborne pollutants, decrease stormwater runoff, and mitigate urban heat island effects, particularly in residential areas with low canopy coverage.*
5. ***Establishing goals and strategies for holistic management and conservation of Seattle's urban biodiversity.***

C. Working toward environmental justice by:

1. *Reducing environmental health disparities;*
2. *Prioritizing work in communities that have experienced disproportionate harm due to air, water, and soil pollution or will disproportionately suffer from compounding environmental impacts and will be most impacted by natural hazards due to climate change;*
3. *Providing opportunities for communities that have been displaced to return to the city in healthy environments and addressing the needs of those at risk of being displaced; and*

4. *Incorporating strategies to prevent displacement of vulnerable communities that could result from implementation of measures to address climate change and resiliency.*

Section 2. The City should consider the following information when revising and adding to the Comprehensive Plan's goals and policies:

A. *Analysis of climate-related trends to identify current and anticipated impacts, including from the Seattle Hazard Identification and Vulnerability Analysis;*
B. *Identification of vulnerable populations and assets (including social, cultural, and economic assets);*
C. *Classification of risks, capital facilities and utilities, and community assets to determine where change is most needed to equitably address climate change, with a specific focus on vulnerable populations;*
D. *Inventories of air, water, and ground transportation facilities and services, including transit alignments, active transportation facilities, and general aviation airport facilities;*
E. *Analysis of disparities in health, environmental burden, and access to green space;*
G. *Identification of natural areas and infrastructure that may be vulnerable to changing environmental conditions; and*
H. *Identification of environmentally critical areas, including habitat* ***and noting those that are rare or limited (e.g., native prairie),*** *vital for safe passage and species migration.*
I. ***Identification of trends in and projected climate impacts to Seattle's biodiversity, within city limits and within the natural areas and watersheds managed by the city that provide drinking water and utilities.***
J. ***Tree canopy assessment and trends in tree canopy cover across land use types and development patterns.***

The preservation of trees and open space is integral to reducing the impacts of natural hazards and improving quality of life for all Seattleites. The Urban Forestry Commission looks forward to seeing the maintenance and growth of green spaces prioritized in Seattle's urban growth strategy.

Sincerely,

References

Barron, Sara, Stephen RJ Sheppard, and Patrick M. Condon. "Urban forest indicators for planning and designing future forests." Forests 7.9 (2016): 208.

Oliver, Tom H., et al. "Biodiversity and resilience of ecosystem functions." Trends in ecology & evolution 30.11 (2015): 673-684.

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Turney, Chris, Anne-Gaelle Ausseil, and Linda Broadhurst. "Urgent need for an integrated policy framework for biodiversity loss and climate change." Nature Ecology & Evolution 4.8 (2020): 996-996.