



Joshua Morris (Position 7 – NGO), Co-Chair

Alicia Kellogg (Position 2 – Urban Ecologist) • **Becca Neumann** (Position 4 – Hydrologist)

David Baker (Position 8 – Development) • **Nathan Collins** (Position 9 – Financial Analyst)

Timothy Randazzo (Position 10 – Get Engaged) • **Jessica Jones** (Position 12 – Public Health)

Lia Hall (Position 13 – Community/Neighborhood)

Date: December 20, 2024
To: Seattle Office of Planning and Community Development (OPCD)
From: The Urban Forestry Commission
Subject: Urban Forestry Commission Recommendations Regarding proposed One Seattle Plan zoning updates
Cc: Mayor Harrell, Chief Operations Officer Lowe, Deputy Mayor Emery, Deputy Director of Policy Valles, Council President Nelson, Councilmember Saka, Councilmember Morales, Councilmember Hollingsworth, Councilmember Rivera, Councilmember Strauss, Councilmember Kettle, Councilmember Mercedes Rinck, Director Farrell, Director Quirindongo, Director Torgelson, Director Lee, Central Staff Director Noble, Central Staff Deputy Director Ho, Long Range Planning Manager Hubner, Strategic Advisor on Housing and Development Staley

Dear OPCD Staff,

The UFC is writing to submit our recommendations on the proposed One Seattle Plan zoning updates as they relate to Seattle’s urban forest and green spaces. Recommendations in this letter focus on proposed development standards, development standard flexibilities and incentives aligned with protection and expansion of Seattle’s tree canopy, and updates to tree planting requirements in Neighborhood Residential zoning.

I. Introduction

The UFC was established in 2009 by [Ordinance 123052](#) to advise the Mayor and City Council concerning the establishment of policy and regulations governing the protection, management, and conservation of trees and vegetation in the City of Seattle. The UFC appreciates the hard work and consideration the City and the Office of Planning and Community Development have put into developing the One Seattle Plan Zoning Update. The City’s urban forests and green spaces provide critical benefits for the health and wellbeing of Seattle’s neighborhoods. The benefits of urban forests are well documented and include mitigating the health impacts of extreme heat, reducing stormwater pollution runoff, improving air quality, and protecting and restoring natural habitats. Now more than ever, we need policies and investments that strengthen tree protection, tree planting, and tree care in planning for a climate resilient and environmentally just future.

The UFC appreciates the opportunity to provide feedback on the draft One Seattle Plan Zoning Update. Past practices have resulted in clearing forest, regrading natural topography, raising and lowering lakes, straightening and severing waterways including the Duwamish and Black Rivers, eliminating tidelands, and displaced peoples. Before us is a great opportunity to create policy that will strengthen our health, our communities, and our natural world.

Our recommendations are based on several priorities critical to advancing Seattle’s climate, environmental justice, and sustainability goals.

- Advance the Citywide goal of 30% tree canopy cover, equitably distributed, by 2037.
- Protect, plant, and care for Seattle’s urban forest as critical infrastructure and a core strategy for community health and climate resiliency.
- Prioritize growing Seattle’s urban forest in overburdened Racial and Social Equity priority neighborhoods with low tree canopy and disproportionately losing tree canopy.

To this end, the UFC requests the City consider the following recommendations on the One Seattle Plan Zoning Updates.

II. UFC Recommendations

Proposed development standards

- Increasing lot coverage will increase pressure to remove trees and add impervious surfaces. To reach our canopy goals, address inequities, and reduce heat island impacts, it will be helpful to maximize preservation of plantable space throughout the development process. The UFC recommends:
 - Considering larger minimum open space requirements, such as 30% or 40%, or explore a range of open space requirements depending on the density of the proposed development, as Portland, OR does.
 - Maintain requirement for at least 20% of the lot area as minimum open space.
 - Require 100% of the open space be at ground level (currently only 50% must be at ground level).
 - Limit uses that count toward the open space requirement to trees, landscaped areas, or other nature-based amenities. Exclude paved and other impervious surfaces. For example, the UFC recommends in-ground swimming pools would not count toward the “open space” requirement.

Development standard flexibilities and incentives

- Maintain and strengthen development standard flexibilities and incentives to retain existing trees and create adequate growing space to support larger trees.
 - Maintain the City’s proposal to waive off-street parking requirements in order to protect a Tier 2 tree¹. The UFC strongly supports this proposal.
 - Extend allowances to waive off-street parking requirements to preserve Tier 3 trees and to plant medium-large and large trees.
 - Maintain and strengthen the stacked flat bonus², as a building type that enables both increased housing density and more open space available for trees and other natural amenities. The UFC recommends the City direct OPCD to study and propose additional stacked-flat incentives to overcome cost, policy, and logistical barriers to uptake of this incentive.
 - Develop incentives for combining lots to maximize the plantable area. This would allow for the plantable area needed for larger tree species relative to smaller lots of similar densities. While the proposed tree point system would require the planting of new trees, we project that larger lot sizes will better provide the plantable area needed to support medium and large species trees.

¹ [One Seattle Plan Zoning Update “Phase 1” Legislation 23.54.015 Table B](#), “A reduction or waiving of parking requirements may be permitted if the Director finds that the reduction or waiver is necessary in order to protect a Tier 2 tree as defined in Chapter 25.11”.

² [One Seattle Plan Zoning Update “Phase 1” Legislation](#) allows additional floor area ratio (FAR) and density for stacked flats on lots 6,000 square feet or greater that are located within ¼ mile of frequent transit as follows: 1.4 FAR and maximum density limit of 1 unit per 650 square feet.

- Allow for additional building typologies, siting adjustments, and height requirements to provide for more plantable area. For example, housing typologies such as cottage courtyards. New development should be allowed to exceed the statutory height requirement in exchange for the preservation of trees. The UFC recommends the City direct OPCD and SDCI to study and identify additional incentives to promote combined lots and siting adjustments as important opportunities to enable both increased housing density and space for trees.
- Maintain language in the existing Tree Protection Ordinance (SMC 25.11) that allows a 50% reduction of required front and rear setbacks to preserve a Tier 2 tree.
- Encourage site plan designs and provide incentives to restore and enhance natural sectors during development such as daylighting creeks within riparian corridors and depaving obsolete surfaces to increase plantable space for trees.

Tree Planting Requirements

- Maintain proposed updates to tree planting requirements based on tree points. The proposed tree planting requirement point system improves incentives for tree protection and planting of conifer and larger stature trees compared to the current caliper inch-based system which treats all plantings equally. However, we request the City consider the following amendments to the proposed tree point system:
 - Clearly define and require a minimum planting area for each canopy size category. We recommend the City direct OPCD to consult with SDCI and SDOT staff arborists to identify the appropriate minimum required planting area for each canopy size category to ensure newly planted trees are in a site that is suitable for survival.
 - Adapt the point system for preserved trees to provide more points when preserving a large species tree or a conifer tree, similar to points for planted trees.
 - Provide additional points for maintaining an existing medium – large or large conifer tree even if the tree is < 6 inches in diameter at the time of construction.
- Strengthen effectiveness of required 5-year tree maintenance for newly planted trees. For example, require tree bonds to better ensure survival or required tree plantings. Seattle Municipal Code requires newly planted trees receive 5-years post-planting establishment care. Without this care newly planted trees are unlikely to survive and grow to maturity. We recommend the City direct SDCI and OPCD, in consultation with SPU’s Trees for Neighborhoods team, to study and identify ways of strengthening compliance with 5-year post-planting maintenance requirements (i.e. improved tracking and/or inspection, increased incentives, education, and support for builders and residents).

In closing, thank you for your attention to our recommendations and for the City’s ongoing commitment to growth and care of our urban forests. We welcome any opportunity to discuss our recommendations and the important benefits urban forests provide.

Sincerely,



Josh Morris, UFC Chair