WASHINGTON ENVIRONMENTAL COUNCIL

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June 8, 2018

Councilman Rob Johnson
Seattle City Council
P.O. Box 34025
Seattle, WA 98124-4025

RE: Trees for All: Updating Seattle's Tree Ordinance to Promote Equity and Healthy Communities

Dear Mr. Johnson,

On behalf of Washington Environmental Council, we write to provide our feedback regarding proposed updates to the City of Seattle's tree ordinance.

Washington Environmental Council (WEC) is a nonprofit, statewide advocacy organization driving positive change to solve Washington's most critical environmental challenges since 1967. Our Evergreen Forests Program works to ensure sustainable land management practices that protect our forests and our Puget Sound program advocates for clean water and healthy habitat to support future generations.

Over recent years, the Puget Sound region has experienced a period of rapid development and urbanization that has resulted in the loss and fragmentation of forests across the landscape. Our organization is concerned by this continued loss of this forest cover because it is a key indicator of the health of Puget Sound. Additionally, these forests provide vital services for protecting community wellbeing and public health by regulating impacts from stormwater, flooding, air pollution and excessive heat in addition to providing important mental health benefits.

Without a comprehensive strategy which engages a range of stakeholders,, it is difficult to see how we can reverse these trends and achieve our long-term goals to protect healthy environments for Washington's residents and provide clean air and clean water for all.

This work requires action from both rural and urban communities across the landscape of Puget Sound. WEC is committed to this work and is actively working with a range of partners across the public and private sectors to find right-fit and actionable solutions for communities. Protecting the resilience of urban forests is critical to this larger effort. Already, Seattle has taken important steps to assess its overall tree canopy and to set targets for overall tree cover of 30% throughout the city by 2037. However, the 2013 "Urban Forest Stewardship Plan" pointed out several outstanding concerns. Notably:

- Few protections exist for mature and older trees which provide outsized benefits compared to younger trees.
- A lack of diversity in overall tree species and age.
- Trees located on private property remain vulnerable to being cut down during redevelopment.
- Central and South Seattle neighborhoods are disproportionately lacking in adequate tree cover and mature trees. These neighborhoods, more often low-income and communities of color, are therefore left

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to bear an uneven burden of pollution and poor environmental quality compared to other neighborhoods in Seattle.

The City of Seattle's "Trees for All" proposal goes a significant way towards addressing many of these issues by creating a permitting system for tree removals, including those on private property, as well as creating a program for trees to be replanted in underserved communities. However, it remains important to draw attention to several key issues, which must be considered in any update to the city's tree ordinance:

- **Urban forest strategies are critical to addressing many issues that also tie in to important work for stormwater control, greenspace access and the protection of public health.** Tree planting and stewardship efforts should be cross-referenced with these plans in order to maximize public and environmental benefits as well as the wise use of public resources. For example, a single mature tree and associated soil can absorb as much as an inch of rain over 2,400 square foot area[1]. Additionally, the cover of a mature urban forest can reduce peak summer temperatures by 9°F, resulting in reduced energy use, less exposure to harmful pollutants and overall improved quality of life[2] [3].
- **The health and wellbeing of the urban forest depends on stewardship.** In particular, young trees are more susceptible to drought and other environmental impacts which can increase tree mortality. In addition to funding set aside for new tree plantings, funding should also be set aside for ongoing stewardship. Stewardship includes regular watering for young trees, pruning and other forms of long-term care. This work can be done by public workers or through dedicated community partners. Advancing robust stewardship efforts in low-income communities and communities of color where new plantings are expected should be a top priority. This work complements the City of Seattle's Racial and Social Justice Initiative by promoting opportunities for youth pathways and equity in employment.
- **Retention of older trees is as important as replanting new trees for achieving canopy coverage goals.** Older trees not only are much more effective in providing important environmental benefits; they also provide significant public health and economic outcomes for communities. Once a tree is cut and replanted, it can take decades before those benefits are recaptured as younger trees are less effective in providing shade, capturing storm water and attenuating heat. In the intervening years, that means additional impacts from such factors as stormwater, flooding, and excessive heat are incurred by the community. The loss of mature trees in a neighborhood can also affect the real estate value of adjoining homes[4]. The retention of older trees is not only important in neighborhoods where they are more established but also in neighborhoods where older trees may be few and far between. In addition to requiring compensation for large older trees removed from private property, the city should protect older and mature trees on public lands from unnecessary removals.

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[1] U.S. EPA. *Stormwater Trees: Technical Memorandum*. 9/2016. https://www.epa.gov/sites/production/files/2016-11/documents/final_stormwater_trees_technical_memo_508.pdf

[2] U.S. EPA. "Using Trees and Vegetation to Reduce Heat Islands." https://www.epa.gov/heat-islands/using-trees-and-vegetation-reduce-heat-islands

[3] Nowak, David J. "The effects of Urban Trees on Air Quality." USDA Forest Service. 2002. https://www.nrs.fs.fed.us/units/urban/local-resources/downloads/Tree_Air_Qual.pdf

[4] Nature Conservancy. *Outside Our Doors: The Benefits of Cities Where People and Nature Thrive*. 2016. https://www.nature.org/ourinitiatives/regions/northamerica/unitedstates/washington/outside-our-doors-

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- **It is important to diversify the species of trees planted to protect against environmental stressors, pests and disease.** This is especially important under future climate projections, with summers expected to be much hotter and drier. Additionally, prioritize adaptable native species, which are important for wildlife habitat. New tree planting should be considerate of these factors and encourage the planting of a resilient future forest canopy.

In conclusion, we very much appreciate your leadership in updating the City of Seattle's tree ordinance. We hope that our comments will be helpful in informing the protection of the city's urban forest in a manner that provides critical environmental benefits and leads to strong equity outcomes for Seattle's most underserved neighborhoods.

Thank you for your consideration of this feedback.

Sincerely,

Becky Kelley

Becky Kelley
President, Washington Environmental Council