

December 14, 2022

Dear Mayor Harrell and Councilmembers,

AIA Seattle is a membership organization of more than 2600 architects, planners, designers, and allied professionals who embrace a vision of Seattle as an equitable, livable, and sustainable city for all its community members. AIA Seattle supports the goals and purposes of the 2015-2035 Comprehensive Plan and the 2020 Urban Forest Management Plan (UFMP), and is concerned about the impact of tree protection updates drafted by Seattle Department of Construction & Inspections (SDCI) and Office of Sustainability and Environment (OSE).

AIA Seattle

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AIA Seattle believes that housing is a human right, and no one should have to live unsheltered. The effect of the legislation as proposed would exacerbate the regulatory burden and therefore the time and cost to build more housing. This is unacceptable. In the current housing crisis, legislation and regulation should streamline housing projects, offering quicker, more affordable, more predictable development pathways.

Trees and housing can and should co-exist. As shared in the UFMP, trees deliver ecological, economic, and social benefits, such as stormwater reduction, watershed function, air pollution removal, water quality protection and wildlife habitat protection. The basic principles that should form the basis of a sensible and productive tree policy that does not further exacerbate the housing crisis include:

- **Focus on creating tree canopy**
Trees can be preserved, but they can also be grown. Identify areas where additional trees can be planted in an equitable and scalable manner, such as on public land and along rights-of way.
- **Recognize the regional impact of trees**
Removing trees to build housing within the city preserves many more trees that would be lost in the Puget Sound watershed if the same housing were to be built elsewhere.
- **Provide certainty**
When trees are removed, the equivalent canopy should be re-planted on site, and if it can't be accommodated, a fee should be charged to allow the city to do off-site planting. A policy that is clear that removal is allowed with a fee that is easy to calculate will allow homeowners and developers alike to quickly evaluate the cost/risk associated with developing a site that may require tree removal.
- **Spend money on planting trees, not on paperwork**
Arborist reports, regulatory review, city inspections, and the attendant

delays and bureaucracy associated with an emphasis on verification of compliance are costly. City and community resources are better allocated to developing the tree canopy.

- **Focus on the problem areas**

Results from Seattle’s Canopy Cover Assessment ([as presented at the 11.30.22 Urban Forestry Commission meeting](#)) show that the largest percentage of loss of canopy was in Parks/Natural Areas (-5.2%) followed by Downtown (-4.3%) and Major Institutions (-4.2%). The largest net loss of canopy cover area was in Parks/Natural Areas followed by Neighborhood Residential. Yet the legislative update will heavily impact multifamily and commercial areas where the majority of new housing production occurs. Tree canopy solutions should focus on problem areas rather than increasing burdens and creating additional delay for urgently needed housing development.

- **Increase the carrots in legislation**

Incentivize preserving or adding trees by giving “by right” benefits to projects which do so. Provide predictable “by right” land use code flexibility to ensure that the maximum buildable area can be achieved on site in an economical manner while maintaining existing tree canopy.

AIA Seattle recommends updates to current legislation and regulation that balance pathways for urgently needed housing solutions with the benefits of trees. We urge the Mayor and Councilmembers to deliver a balanced plan which will not further exacerbate Seattle’s housing crisis.

A handwritten signature in black ink, appearing to read "Sheri Newbold".

Sheri Newbold
Co-chair, AIA Seattle Housing Taskforce

A handwritten signature in black ink, appearing to read "Patrick Taylor Walch".

Patrick Taylor Walch
Co-chair, AIA Seattle Housing Taskforce

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