

**Addendum to the
Final Environmental Impact Statement**

**Yesler Terrace
Redevelopment**

**Update to Tree Protection Plan (TPP)
Exhibit C of Planned Action Ordinance
(PAO)**

October 31, 2019

Fact Sheet

Project Title

City of Seattle Yesler Terrace Redevelopment

Proposed Action

The proposal addressed in this addendum to the Final Environmental Impact Statement (FEIS) is to update the Tree Protection Plan (TPP) Exhibit C of the Yesler Terrace Planned Action Ordinance (PAO) to accommodate future redevelopment phases of Yesler Terrace. Yesler Terrace is a 36.6-acre site near downtown Seattle that was developed by the Seattle Housing Authority (SHA) in the early 1940s as the city's first publicly subsidized housing community. In 2006, it had become evident to SHA that Yesler Terrace's infrastructure and its aging housing units needed to be replaced. Planned Action Ordinance 123926 was approved and adopted by City Council in 2012.

This proposal relates to the redevelopment of Yesler Terrace, which began in 2013 with an anticipated buildout to be completed in mid-2028. Over the past five years, the Seattle Department of Construction and Inspections (SDCI) has approved several Master Use Permits (MUPs) and associated construction permits for Yesler Terrace. At present, there are development proposals within the planned action area that are currently in the City's permit process awaiting approval, and others anticipated to be applied for in the future.

The proposed action is to make limited modifications to the Tree Protection Plan (TPP) Exhibit C of the Planned Action Ordinance that include:

- Update maps within Exhibit C - Tree Protection Plan (TPP) of the Yesler Terrace Planned Action to reflect existing conditions as well as correct errors found by staff from the time of adoption to present date;
- Correct the Tree Protection Plan Inventory chart included in the Tree Protection Plan – Exhibit C to be consistent with the trees shown on the map; and
- Update provisions for development proposals that meet the planned action ordinance requirements within the MPC-YT zone to have the option to use payment-in-lieu of replanting, as well as off-site replanting, if allowed pursuant to Chapter 25.11; and
- Clarify the timing for reporting on tree removal mitigation, which is to occur after the development contemplated in the PAO is completed.

Other existing mitigation measures for tree replacement are maintained, including tree replacement ratios. The replacement ratios for Tier 1 and Tier 2 trees will continue to be 10 to 1 and 1 to 1, respectively.

Location

The proposal would apply within the existing boundaries for the Master Planned Community-Yesler Terrace (MPC-YT) zoning classification in the planned action area. This area comprises the PAO, which is within the City of Seattle's First Hill and Central Area neighborhoods. The site is generally bound by Interstate 5 (I-5) on the west; Alder Street and E Fir Street on the north, Boren and 12th Avenues on the east and S Main Street on the south. This site was expanded in the FEIS to include an approximately 2.3-acre area east of 12th Avenue (referred to as East of 12th). In addition, the proposal would allow trees to be planted outside the MPC-YT boundaries, throughout the city.

Proponent

City of Seattle

Lead Agency

City of Seattle Department of Constructions and Inspections (SDCI)

Date of Implementation

Winter 2019

Environmental Review

Consistent with the SEPA Rules, this addendum adds information to the analysis provided within the Environmental Impact Statement (FEIS issued April 2011). There were no SEPA appeals regarding the FEIS. This addendum is complementary to the analysis and information that was provided in the FEIS. Some content is beyond the minimum amount to provide complete and useful analysis to decisionmakers. The DEIS, FEIS and this addendum meet SDCI's SEPA responsibilities for the proposal and will accompany the proposal to the decision-maker.

Author to This EIS Addendum

City of Seattle Department of Construction and Inspections (SDCI)

Date of Issuance of This EIS Addendum

October 31, 2019

EIS Addendum Comments Are Due

November 15, 2019

Written Comments Are to Be Submitted to

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Documents Available:

Copies of this addendum are available for public review at:

SDCI Public Resource Center (700 Fifth Avenue, 20th Floor);

Hours: Monday, Wednesday, Friday: 8:00 a.m. - 4:00 p.m.

Tuesday, Thursday: 10:30 a.m. - 4:00 p.m.

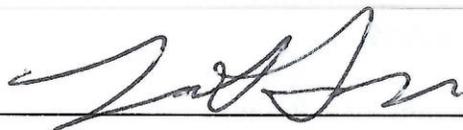
The addendum may be viewed at SDCI's website, at:

<https://www.seattle.gov/sdci>

Responsible SEPA Official

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Date: October 31, 2019

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Glossary of Terms

The following acronyms are frequently used throughout this addendum and are provided for reference.

DEIS Draft Environmental Impact Statement

DPD City of Seattle Department of Planning and Development (now SDCI)

EIS Environmental Impact Statement

FEIS Final Environmental Impact Statement

HSD City of Seattle Human Services Department

HUD Housing and Urban Development

MPC-YT Zoning designation for the Yesler Terrace Master Planned Community

MUP Master Use Permit

NEPA National Environmental Policy Act

PAO Planned Action Ordinance

SDCI Seattle Department of Construction and Inspections

SDOT City of Seattle Department of Transportation

SEPA State Environmental Policy Act

SHA Seattle Housing Authority

SPU Seattle Public Utilities

TPP Tree Protection Plan

WSDOT Washington State Department of Transportation

Affected Environment

This is a non-project action that affects future redevelopment proposals located within the Yesler Terrace Planned Action Ordinance in the MPC-YT zone. The FEIS identified a Preferred Alternative that included approximately 5,000 housing units, 900,000 square feet of office/hotel use, 88,000 square feet of neighborhood commercial uses, 6.5 acres of public open space, 9.4 acres of semi-private and private open space, and up to 5,100 parking spaces within or under buildings. Excluded is approximately 65,000 square feet of neighborhood services (Yesler Community Center). Other potentially affected areas included for purposes of analysis are the neighborhood areas outside of the Yesler Terrace Planned Action area where tree replanting is proposed for future development proposals.

Background

In April 2011, the City of Seattle Human Services Department (HSD) and the Seattle Housing Authority (SHA) on behalf of the U.S. Department of Housing and Urban Development (HUD) issued a Final Environmental Impact Statement (FEIS) for the Yesler Terrace Redevelopment. The City HSD served as the Responsible Entity for proposal review under the National Environmental Policy Act (NEPA); SHA served as the Lead Agency for the review under the Washington State Environmental Policy Act (SEPA). The FEIS was a joint NEPA-SEPA document. In 2011, the City of Seattle (SDCI, formerly DPD) filed a State Environmental Policy Act (SEPA) Notice of Adoption of the FEIS.

The purpose of this proposal is to clarify application of the Yesler Terrace Tree Protection Plan, adopted as Exhibit C to the Yesler Terrace Planned Action Ordinance 123962. The Yesler Terrace Planned Action Ordinance (PAO) designates certain projects as planned actions pursuant to the State Environmental Policy Act and SMC 25.05.164. To qualify as a planned action, a project must comply with the mitigation measures and conditions contained in the Planned Action Mitigation Document in Exhibit B to the Ordinance, and the Tree Protection Plan incorporated into Exhibit B by reference and attached to the Ordinance as Exhibit C.

As described in the Land Use Code SMC 23.76.004 and 23.76.006, SDCI makes a determination as to whether a project is consistent with a planned action ordinance. Among other factors specified in the PAO, that determination includes an evaluation of whether a project complies with the Yesler Terrace Tree Protection Plan (TPP).

In addition, pursuant to authorization in Ordinance 123961, the City and the Seattle Housing Authority (SHA) entered into a Cooperative Agreement regarding development at Yesler Terrace. Section 16.1 of the Cooperative Agreement requires that all development within the MPC-YT zone comply with the Planned Action Mitigation Document in Exhibit B to Ordinance 123962 and the Exhibit C Tree Protection Plan, even if such development does not qualify as a planned action.

The Tree Protection Plan is also referenced in the Yesler Terrace Design Guidelines adopted by Ordinance 123963. The Yesler Terrace Supplemental Guidance, CS1, page 2, includes a reference to “preserve trees designated for protection in the adopted Yesler Terrace Tree Protection Plan.”

The City of Seattle’s Urban Forest Management Plan notes that “a healthy, well-managed urban forest provides numerous benefits for the community identified as Environmental Values, Economic Values and Social Values. Trees filter pollution, sequester carbon dioxide, mitigate stormwater, provide habitat, reduce heat island effect, define neighborhoods and provide scale and seasonal interest. Through this plan the City has set a goal of achieving 30% canopy cover by 2037, which is an increase of 7% from the 2009 assessment of 23% coverage. An important component of achieving this goal is maintaining existing tree canopy. The TPP was included as part of the Yesler Terrace Planned Action to recognize the role played by the provisions of the PAO and supporting documents in helping to preserve, replace trees and protect tree canopy as part of this City goal.

Proposal Description

This addendum has been prepared to respond to the changes proposed in the TPP and Exhibit C to Ordinance 123963 including:

- 1) Development and tree clearing that has occurred since adoption;
- 2) Changes to the configuration during the final platting approval for Block 7, including the exclusion of the city-owned right-of-way as well as the Yesler Community Center property;
- 3) Errors in the inventory and associated maps, and
- 4) A new proposal to allow for flexibility to mitigate for tree removal by allowing trees to be mitigated by payment-in-lieu of tree planting, if allowed per Seattle Municipal Code Chapter 25.11, and to be replanted outside of the boundaries of the MPC-YT PAO.

The Yesler Terrace Planned Action Environmental Impact Statement (EIS) remains applicable, as supplemented by analysis in this addendum.

The current proposal would broaden the kinds of mitigation options that may be pursued when it is required for proposed tree removal. New options would include the possibility of off-site replacement tree planting and/or payments-in-lieu of replacement tree planting. This would apply to Tier 1 and Tier 2 trees in locations that would conflict with future building footprints and plat infrastructure.

The Yesler Terrace Tree Protection Plan (TPP) was derived from the inventory and analysis in the Yesler Terrace Redevelopment Final Environmental Impact Statement (FEIS). This inventory assigned each tree a number that corresponds to a location on a series of maps for cross-

referencing and tracking purposes. The TPP designated inventoried trees as Tier 1 – Trees to be preserved, and Tier 2 - Trees that can be removed but need to be replaced.

The need for the proposal also relates to changes in right-of-way configurations as well as revised site plans for Block 7 that were designed after the initial approval of the Yesler Terrace PAO. In addition, the quantity of replacement trees that were ultimately required by the City Council as a mitigation strategy was larger than the quantity of tree replacement anticipated by the EIS.

At the time the Yesler Terrace PAO was adopted, the future plat had yet to be approved which required assumptions to be made about where rights-of-way would be located or reconfigured, how access to parking garages would be provided, and how the site was to be subdivided into development parcels, pocket parks, and shared bicycle and pedestrian trail tracts that were required public benefits.¹ The location of protected trees was based on these assumed layouts. When the plat for the site was approved in 2014, DPD (now SDCI), SPU and SDOT determined that the private access drives, created to provide access to parking, would need to be in areas other than those identified in the Yesler Terrace PAO (specifically, in the TPP). Changes in layout were due to infrastructure needs for water and sewer improvements, as well as the location of Harborview Medical Center’s air ambulance flight path and the associated height restrictions that SHA has voluntarily imposed on that portion of Yesler Terrace. The height restrictions are intended to allow continued safe operation of the heliport that is needed for the hospital to maintain its Level 1 Trauma Center status.

When the Yesler Terrace PAO was approved, Block 7 had been initially configured with an access drive running north-south along its western margin, against the WSDOT I-5 right-of-way, and another access drive running east-west from 8th Avenue to the north-south access drive. Two Tier 1 trees, 88 and 89 (see the map and tree inventory in the TPP), were designated near the junction of the two access drives, on the assumption that these trees would not impair development because they were located at the edges of development parcels. The originally adopted TPP shows the original arrangement of the access drives and the locations of these trees. Additionally, designation of trees 88 and 89 as Tier 1 was based on their size, rather than being a unique species or in exceptional condition, or location as described above.

During the platting process, further consideration of the initial arrangement of access drives raised concerns for security of the north-south access drive, due to reduced visual surveillance, and concerns for constructability of the east-west access drive due to the steep, parallel topography. In the final plat, the east-west access drive was eliminated as unnecessary, and the north-south access drive was relocated to correspond to the eastern edge of the flight path height restriction. This resulted in a development parcel to the west of the access drive leaving trees 88 and 89 in approximately the middle of the site, impairing development of the parcel in a way that the TPP had originally intended to avoid as tree protection was not intended to

¹ These were required by the approvals of street vacation proposals for the vicinity. Yesler Terrace Redevelopment Update to Tree Protection Plan (TPP) Exhibit C of Planned Action Ordinance (PAO) Addendum to the Final Environmental Impact Statement (FEIS)

prevent or hinder development. As a result of the flight path's influence, development potential on this site is significantly constrained by the height restriction in place for the heliport. The portion of this parcel north of trees 88 and 89 is restricted to a height limit of 30 feet, whereas the majority of the MPC-YT is zoned to at least 85 feet. Building around these trees would thus reduce the buildable site by nearly one third to one half its size. The locations of trees that had received Tier 1 designation during the time of the PAO's approval based on their proximity to an access drive were never updated after the plat was adopted and the locations of the pocket parks and pads were revised.

Final plat layouts indicate that there will be a limited number of Tier 1 and Tier 2 trees located in the same locations where buildings and infrastructure are likely to be permitted in the next phases of redevelopment at Yesler Terrace. The result is that some existing trees that were previously considered likely to be protected are now likely to be removed. In relation to future probable development, if flexibility is granted for different development layouts in the Block 7 locations, a total of six trees would be removed and need to be replaced or otherwise mitigated as part of the redevelopment. The table below provides a brief description of the trees that would be impacted, which are: Trees 88, 89, 74, 75, 76 and 4. Trees 88 and 89 were labelled in the Inventory as Tier 1 trees. The others are labelled as Tier 2.

Ordinance/Code Citation	CHANGE
Original EXHIBIT C - TPP - Trees 88 and 89	In order to provide tree protection in line with the intent of the tree protection goals of the PAO the designation of Trees 88 and 89 is being changed from Tier 1 to Tier 2.
Original EXHIBIT C - TPP - Trees 74, 75, and 76	Three trees (74, 75, and 76) that are located within the boundary of the platted pocket park for Block 7 that were listed at Tier 2 at the time of the PAO approval are having their designations changed from Tier 2 to Tier 1, as these trees are cumulatively of similar size and condition as Trees 88 and 89 and are located outside of planned development areas. When the trees were initially surveyed during the EIS process Tree 75 was considered eligible to qualify as for Tier 1 designation. Tree 74 also met the criteria for being considered Tier 1 at this time, but 76 did not.
Original EXHIBIT C - TPP - Tree 4	As an additional clean up item, Tree 4 is currently listed in the TPP Inventory as a Tier 2 tree. However, this tree was not included on the corresponding TPP map. According to the tree condition survey that was conducted during the EIS process in 2010 this tree was in poor condition and determined to have a low probability of long-term survival according to the consulting arborist who conducted the evaluation. This tree is being removed from the TPP inventory as it is was originally included in error.

**Ordinance/Code
Citation**

CHANGE

Original Exhibit C

New language added to allow for proposals that meet the planned action ordinance requirements within the MPC zone to have the option to use off-site replanting and payment-in-lieu of replanting if allowed pursuant to Chapter 25.11

The required replacement trees could be planted on the Yesler Terrace site or under the current proposal could be planted on other properties in the city either directly planted or through use of in-lieu mitigation payments. The ability to locate replacement trees within the Yesler Terrace Planned Action area would depend on the availability of enough space. Currently, the requirement is for every Tier 1 tree removed, there must be 10 replacement trees planted. For Block 7 or other future development within the Yesler Terrace Planned Action area, there may be locations on Yesler Terrace properties but there also may be limits to the number of sites that are suitable to plant new trees. The City Council in adopting the PAO, by mandating a 10-to-1 tree replacement policy for Tier 1 trees instead of a more modest ratio such as 2-to-1 or 3-to-1, increased the likelihood of running out of space to plant new trees at Yesler Terrace. The EIS review suggested tree replacement would occur but did not provide a specific replacement ratio except to suggest a possible mitigation measure as a 2-to-1 ratio in the FEIS.

Potential practical matters raised by the 10-to-1 tree replacement ratio include the possible shortage of planting spaces with sufficient separations between buildings and other open spaces because planting too close to buildings could jeopardize the health and survival of the tree as well as limit a tree's overall canopy coverage potential. Trees could be planted in areas with inadequate or less desirable characteristics for their growth and health, such as substandard soil quality or insufficient soil volumes to adequately support the number of replacement trees. In addition to compromised health or growth potential, limiting replanting to only replacement within YT-MPC would lead to denser new tree plantings that could ultimately interfere with other desirable amenities on the Yesler Terrace site, which may create places with low surveillance that could diminish public safety, or block views from public facilities, or crowd other desirable open space or recreational features.

There would be similar implications for allowing replacement trees to only occur on certain properties such as only those within a set distance from the Yesler Terrace Planned Action area. While there could be some replanting sites nearby such as park or school properties, the need to plant 10-20 replacement trees at a time could exceed the practical abilities to find and secure enough land because opportunities within developed private properties and rights-of-way could be limited.

For example, limiting the geography for tree replacement might create risks of diminished success such as tree canopy growth, which may compromise the long-term biological health. Planting replacement trees too densely, in lesser-quality soils or in substandard locations could

hinder trees' long-term health and survival rates and could cause them to grow less fully. These factors could all affect both the extent of tree canopy coverage and the quality of the trees. In contrast, allowing for greater flexibility to plant replacement trees more broadly across the city would increase the chances that replacement trees would be planted in places with suitable soil and habitat conditions for their growth and health and where those trees could be planted in appropriate densities which could benefit other areas or neighborhoods that could be in need of additional tree canopy.

The current proposal accommodates the possibility that tree replacement could occur partly within the Yesler Terrace Planned Action area and partly through off-site, including in-lieu payments, that would be used to plant replacement trees citywide. The widest allowance for tree replacement location would help ensure success by providing a combination of siting opportunities for new trees while at the same time lead to new tree planting within the Yesler Terrace boundary in areas where trees will have the best chance for long term survival and city-wide canopy contribution.

Demonstration of Compliance with Tree Removal Mitigation

The proposal would continue to fulfill the original intent to achieve mitigation, by compensating for the impacts of tree canopy loss through replacing, enhancing, or providing substitute resources or environments, consistent with the definition of SEPA mitigation outlined in SMC 25.05.768 as well as per WAC 197-11-768.

The alternative mitigation options would allow for trees that are scheduled to be removed, replaced or replanted to be documented in the proposed updated TPP Map and Tree Inventory included at the end of this addendum. SHA would submit updates to the map and inventory annually to SDCI per the existing Cooperative Agreement. This documentation would serve as a record of which trees are being removed, replaced, replanted or when payment-in-lieu is applied to satisfy requirements. The completion of tree mitigation actions would be documented by SHA at the completion of all phases of development contemplated in the PAO.

Analysis

The Yesler Terrace DEIS indicated that its analysis was not of a definitive development plan for building sites and roadways. Rather, it was programmatic and made assumptions about various site development outcomes for the purpose of the impact analysis. On page 3.4-7 the DEIS acknowledged that final site development layouts would depend on design decisions that would be subject to permit review, which means that future development impacts related to trees could vary from what was evaluated in the DEIS. The Final EIS was similarly programmatic, as it presented a different conceptual site development layout representing the Preferred Alternative (as portrayed on Figures 2-5 through 2-9 in the Final EIS).

This addendum includes information that is additive to that in both EIS documents (the EIS), relating to the prospective new actions that are likely to result in changes to the final build-out of the YT PAO (the reconfiguration of Block 7 and the introduction of tree replanting beyond off the YT PAO site). Also included is additional analysis of the proposed changes and a comparison of those changes to what was studied.

1. Analysis of the Proposal's Changes

Regarding changes within Block 7, the EIS's analysis for the Preferred Alternative in the FEIS had concluded lower overall tree loss impacts than the other alternatives 1, 1A, 2, 3, and 4. The current development plan for Block 7 was originally related to the Preferred Alternative but has been adjusted to address changes in the final plat design. While this would change conclusions about the Preferred Alternative, the future canopy coverage achieved within Yesler Terrace would still remain within the range of canopy cover outcomes that were evaluated in the EIS.

The FEIS analysis had assumed that all tree replacement would occur within the Yesler Terrace Planned Action area, and accordingly made assumptions about how much future tree canopy cover there would be as replacement trees matured over time. A possible mitigation replacement ratio was stated as 1-to-1 or potentially greater with 2-to-1 in the FEIS. The FEIS did not analyze a mitigation replacement ration of 10-to-1 for Tier 1 trees.

The Urban Forestry Management Plan (UFMP) also described a tree canopy goal that was not adopted at that time, for purposes of comparing probable future canopy coverage outcomes to a benchmark of draft canopy coverage goals on developed sites. On page 3.4-9 of the FEIS, the UFMP's goals were indicated as 20% canopy cover for sites in multifamily zones and 15% canopy cover for sites in commercial zones. The Yesler Terrace Planned Action area blends both multifamily and commercial land uses. The FEIS concluded that while the other action alternatives could accomplish a future projected canopy cover of 20-21%, the Preferred Alternative could accomplish a canopy cover of about 23.4%.

Table 3.4-2 of the FEIS, stated that under the Preferred Alternative, there are 22 Exceptional Trees of which 15 were to be removed and 7 were to be retained. With the current proposal to allow tree replacement off-site outside of the Yesler Terrace Planned Action area, there may be fewer trees replaced on site than would be without the off-site option. However, to date nearly double the number of trees that have been removed have been replaced on site. This number of replacement trees is part of the rationale for needing additional locations beyond the Yesler Terrace Planned Action area for replacement trees. The prescription of the 10-to-1 tree replacement ratio for Tier 1 trees has also created a practical difficulty in the ability to accommodate all of the tree replacement within the Yesler Terrace Planned Action area due to the limited amount of unbuilt space available for planting once right-of-ways, driveways, streets, utilities, and building foundations have been installed. The current canopy cover of the replacement trees amounts to a 16% increase from the cover prior to redevelopment of Yesler Terrace. The off-site replacement option may result in a lower overall canopy cover amount

than what was anticipated to assumed in the FEIS for Yesler Terrace but will contribute to canopy cover elsewhere in the city.

The current proposal to reconfigure Block 7 and construct buildings that are not as tall and are wider than the site configuration at the time of the PAO's adoption, but prior to the final plat approval indicate that there will be less density but more impervious areas because the building footprints will take up a larger portion of the lot. This means that there will be less soil volume available for trees and a more limited number of areas where trees could be replanted on site.

If there is such a difficulty, then the allowance for off-site citywide tree replacement is a way in which the benefits of additional tree canopy cover can be achieved, even if the extra trees are spread around the city as a whole. The responsibility for planting those trees would be either on the Seattle Housing Authority or on the City of Seattle if fee-in-lieu contributions to the City are used as a tree replacement strategy.

2. Analysis by Applicable Environmental Elements

Impacts for many of the elements of the environment analyzed in the EIS would remain unchanged with the proposal and are not included in this addendum. In addition, nearly half of the redevelopment within the Yesler Terrace Planned Action area has already been constructed. To date more than 16% more canopy has been replaced than has been removed and the number of trees replaced is double those that were removed. Approximately 95 percent is comprised of built areas including building footprints, streets, sidewalks, parking and landscaped public and private open spaces. The remaining five percent is comprised of landscaping. The vegetation sited on those blocks is comprised of plant species such as street trees, shrubs and groundcover.

As stated in previous sections, the tree canopy coverage for the entire Yesler Terrace Planned Action area may be reduced compared to the Preferred Alternative studied in the EIS depending on a number of factors, including changes to the configuration of Block 7 and the exclusion of the Yesler Terrace Community Center from the TPP. However, there are opportunities to increase the tree canopy coverage in other parts of the city, outside of the PAO area if the applicant has the flexibility to mitigate for tree removal using a fee-in-lieu option for citywide tree replanting. According to the City's GIS website², there are a number of neighborhoods citywide that fall short of their canopy coverage goals. Seattle Department of Transportation (SDOT) has created 27 Urban Forestry Management Units to manage the street trees in the City. Street trees are defined as all trees growing within public places, which includes all public right-of-way. On a citywide scale, there are some neighborhoods that have more street trees than other neighborhoods. A more equitable distribution of trees throughout the city would be a positive benefit to areas that either have a shortage of trees or lack trees and to the city overall, including the YT PAO area.

² seattlecitygis.maps.arcgis.com/apps/MapSeries/index.html?appid=a7072ffa326c4ef39a0f031961ebace6
Yesler Terrace Redevelopment
Update to Tree Protection Plan (TPP) Exhibit C of Planned Action Ordinance (PAO)
Addendum to the Final Environmental Impact Statement (FEIS)

The following environmental elements are discussed in this section of the addendum:

- Earth
- Plants and Animals

Earth

Findings about potential impacts to earth and drainage as a result of the current proposal are similar to findings in the EIS. Slight differences in localized outcomes with respect to sedimentation and erosion resulting from construction activities might occur if fewer replacement trees were located on the Yesler Terrace property. No additional impacts to the environment would be anticipated due to the use of standard Best Management Practices, which would include temporary sediment and erosion control measures required by the City of Seattle, state regulations and conditions of permit approval for construction related impacts. Once construction is completed for the redevelopment, it is anticipated that all stormwater runoff will be mitigated by compliance with the requirements of the Green Factor landscaping provisions, which would reduce or eliminate sedimentation and erosion prior to discharge to Puget Sound and/or its tributaries.

Plants and Animals

On-site plant conditions are similar to the environments described on the EIS. According to the EIS, there are no federally endangered or threatened plant species on site or in the vicinity of the site. The current proposal will have no additional impacts to plants other than new landscaping will must be in compliance with city code and rules, such as Director's Rule 30-2015 Standards for Landscaping including Green Factor, which provides direction on the care and maintenance of plantings, including soil preparation, use of compost, plant replacement, irrigation, weed and pest control, control of invasive species, and care and maintenance of water or hardscape features. In addition, the establishment of more native vegetation at Yesler Terrace will have a positive benefit for the natural environment because native species are less susceptible to disease than nonnative or ornamental plant species which do not grow as well in the climate of the Pacific Northwest.

Wildlife observed at Yesler Terrace is consistent with other highly urbanized areas of the city. According to the FEIS, species observed included the grey squirrel, rock dove, glaucous-winged gull and domestic cat. Animal species such as squirrels and birds are generally adapted to the urban environment and would likely use habitat on-site or similar habitat during construction of the remaining blocks at Yesler Terrace. Findings about potential impacts to animals as a result of the current proposal are the same as the findings in the FEIS.

There is no critical habitat at Yesler Terrace listed under the Endangered Species Act (ESA), or protected habitat as defined by City, State or Federal regulations. The current proposal does

not change this. The closest critical habitat to Yesler Terrace Planned Action area is Lake Washington and Lake Union (both located more than 1.5 miles from Yesler Terrace). The closest Washington Department of Fish and Wildlife Priority Habitat and Species databases indicate that the closest WDFW priority habitat – identified as a biodiversity area and corridor – is located approximately 1,500 feet south of the site (and south of I-90). Findings about potential impacts to on-site habitat as a result of the construction of new buildings at Yesler Terrace are similar to the findings in the FEIS. No additional impacts are anticipated.

Mitigation Measures

The existing mitigation measures reproduced from the FEIS Plants and Animals Technical Addendum Section 3.5.1 are listed below to assist SDCI plan reviewers in the review of individual development proposals during the redevelopment of Yesler Terrace.

- ***Incorporate techniques that could preserve or prevent existing exceptional trees from being damaged or destroyed by construction activities, which would potentially minimize the quantity of exceptional trees that require mitigation. Prevention and preservation are considered mitigation techniques. Also, incorporate design techniques that could increase tree survivability over time.*** Techniques could include:
 - a. **Incorporate creative site planning and architectural design.**
 - (1) Set the lower levels of the buildings away from the trees and their CRZ (a cantilever or balcony effect).
 - (2) Design the edges or portions of buildings and underground structures to avoid trees and their CRZ.
 - (3) Install porous pavement (concrete, asphalt, pavers, or cells) or landscape areas in urbanized areas that will potentially assist in tree preservation.
 - (4) Design sidewalks, roads, streets, and other impervious hardscape elements such that they avoid trees and their CRZ.
 - (5) Locate existing overhead and proposed utilities underground, to the extent practicable, to avoid maintenance pruning and removal of trees in conflict with overhead utilities.
 - (6) Consider future growth patterns of trees so that they will not need to be pruned to prevent harm to architectural features.
 - b. **Incorporate practical and creative landscape design and installation practices.**
 - (1) New trees and other plant material should be installed in areas that will not conflict with the health of the remaining trees.
 - (2) New trees and other plant material should be installed such that they do not conflict with each other or architectural features.

- (3) Consider the vertical and horizontal layering of the vegetation as it grows over time. A varied vertical and horizontal layering is ideal.
- (4) Design should consider incorporating elements of Seattle's Green Stormwater Infrastructure (GSI)/Green Factor program.

c. Implement construction methods and sequencing to preserve trees proposed to be retained onsite. Examples include:

- (1) Install chain-link fencing around trees before mobilization to prevent damage from construction activities.
- (2) Locate root systems visually or by other means (such as using underground radar equipment) to determine where construction activities should not occur.
- (3) Consider the following when selecting vegetation species for the site:
 - (i) Invasive species, noxious weeds, and/or vegetation that contain allelochemicals that cause detrimental effects to other vegetation should not be planted within or near the project boundaries.
 - (ii) Native plants have a higher chance of surviving regional weather conditions and are more suited for attracting native animals.
 - (iii) Certain trees are considered harmful to hardscape surfaces. Trees that should be avoided in areas that have hardscape within the CRZ at maturity include, but are not limited to species of maples, American elm, tulip tree, pin oak, sweetgum, ash, cottonwood, and willows (Rindels, 1995).
 - (iv) Native evergreen species are ideal (especially evergreen conifers) for LID concepts in terms of assisting in matching pre-existing conditions and mimicking the hydrologic cycle.

- ***For exceptional trees or valuable trees that cannot be preserved in place, transplant within the project area as a means of preservation. Transplanting should occur only if feasible and per the direction of the City.***

In conclusion, the following paragraph describes the proposed revisions to Exhibit C of the Planned Action Ordinance which include additional mitigation measures to allow for both off-site tree replanting and/or the use of fee-in-lieu payments for redevelopment at Yesler Terrace.

- ***Allow for the flexibility to mitigate for tree removal by allowing trees to be mitigated by payment-in-lieu of tree planting, if allowed per Seattle Municipal Code Chapter 25.11, and to be replanted outside of the boundaries of the MPC-YT PAO.*** This scenario accommodates the possibility that tree replacement beyond that which has already taken place could occur partly within the Yesler Terrace Planned Action area and partly through off-site, including in-lieu payments, that would be used to plant replacement trees citywide. The City could allow for the widest allowance for tree replacement

location to help ensure success by providing a combination of siting opportunities for new trees while at the same time allow for new tree planting within the Yesler Terrace boundary in areas where trees will have the best chance for long term survival and city-wide canopy contribution. The replacement ratios would remain unchanged with this proposal for both Tier 1 and Tier 2 trees at 10:1 and 1:1, respectively.