Thornton Creek Alliance Comments
Draft One Seattle Plan
May 2024

1. GENERAL

- Missing from the One Seattle Plan is a section on Neighborhood Plans. This is a clear change from Seattle 2035 – what happened to neighborhood planning?

- A document, crosswalk or marked copy of the new comp plan showing changes from the previous plan would help the public's review.

- The plan is siloed. It needs to better coordinate the various sections of the plan.

2. GROWTH STRATEGY

- Planning for Growth

  - The GS1.G1 goal of this policy element of the plan should include becoming carbon neutral, maintaining and enhancing the natural environment, diversity of urban fauna, increasing public and private open space, maintaining and enhancing the tree canopy.

  - Policy GS 1.5 states: "Limit rezones that would result in negative impacts to Environmentally Critical Areas".

    The state is now mandating development up to the edge of ECAs, whereas under HB 1110 the entire lot that included the ECA was exempted. Policies included in the One Seattle Plan are not enough to truly protect public safety or needed greenspace. Why allow damage up to the very edge of an ECA? What about City Greenspaces or habitat outside ECAs?

- Growth Strategy Overview

  - The GS G2 goal of this policy element and the Future Land Use Map (FLUM) that set development patterns - need to incorporate the need for open space and healthy, mature tree canopy.

- Parks and Open Space

  - This policy section should be protective of parks and open spaces. Policy GS 9.3 and 9.4 are anything but protective. If this is current policy, it needs to be amended (page 30). Further, Seattle Parks and Recreation is looking for ways to add uses to parks which will assuredly limit their holding capacity for healthy greenspaces. (2024 Parks and Open Space Plan SEPA DNS, p. 126). This will further reduce the mature tree canopy.

3. CLIMATE AND ENVIRONMENT

- Carbon Pollution Reduction

  One of the City's goals is '…to reach zero carbon – no greenhouse gas (GHG) emissions. Unfortunately, the only path to reaching this goal described in the One Seattle Plan is to reduce/transition from fossil fuels to renewable energy. While this is huge, another measure towards reducing GHG, increasing and maintain the urban canopy is ignored in both the One Seattle Plan and the DEIS evaluating Plan impacts. The first line of defense against Urban Heat Islands is the urban forest. Every single publicly available article online begins with keeping a well-developed urban tree canopy. You can learn more about how trees sequester carbon and clean the air here: https://www.fs.usda.gov/psw/topics/urban_forestry/products/cufr_658_Air_pollution_solution.pdf

  The consequences of ignoring increasing temperatures and their effects on people are just beginning to be understood. You can learn more here: https://www.nytimes.com/2024/04/16/opinion/climate-change-heat-hurricane.html?unlocked_article_code=1.mE0.ftG-.NhQwtrtNSPKE&smid=em-share

  Policies on tree retention and carbon sequestration, and how to prevent heat islands with new development need to be incorporated into the One Seattle Plan This policy element needs to incorporate these measures – this section and information need to influence an update of the tree ordinance. The DEIS needs to evaluate this preventative and mitigative measure.

- Development Pattern

  Page 141- the discussion is erroneous. – 'Growth in urban areas also reduces development on the urban fringe, which contributes to sprawl, vehicle miles traveled, and the conversion of farms and forests'

  Where are the urban farms and forests within the City of Seattle? They don't exist. Look at Ridgefield Washington. An urban growth boundary and Vancouver City limits have not protected farms or forests in this area. Sprawl continues and accelerates.

- Community Based Climate Resilience – (pages 145 & 146)

  Policies CE 8.2 and 8.5 regarding climate change mitigation should include tree canopy (large, mature trees) protection. Large trees are an important component to shielding communities from the global warming aspect of climate change. The larger the tree, the more carbon is safely stored inside. Plus, older trees accumulated

centuries of carbon in living and dead plant materials and soils. There is no upper limit on how much carbon a tree can store over time. As trees age, their annual rate of carbon accumulation accelerates. More here:
https://environmentamerica.org/articles/how-old-trees-help-fight-climate-change/#
https://www.nature.com/articles/nature12914

- Tree Canopy (Page 150)
    - Policies CE 12.4, 12.6, and 12.8 – include the concept of 'large trees' but no protective measures. Add policies that protect the existing urban canopy.

4. Historic Preservation and Cultural Resources

- LU G16 – this goal needs to specify preservation of cultural resources to be consistent with the state definition RCW 36.70A.020(13) and WAC 365-106-450

> "(1) RCW **36.70A.020**(13) calls on counties and cities to identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance, herein referred to as "cultural resources." Although the act does not require a separate historic preservation element, counties and cities must be guided by the historic preservation goal in their comprehensive plan."
>
> Add policies to match this definition.

5. Parks and Open Space Policy Element

- Access to Public Space
    - Goal - PGI – the parks and open space goal excludes recognition, protection and/or maintenance of parks natural areas. Please amend this goal to include the following (excerpted from the 2024 Parks and Open Space Plan Appendix C)

> "Plant more trees to reduce urban heat island effects, more trees to create expanded canopy and shade."
>
> "Acquire more parks and open spaces..."
>
> "Provide more parks and higher density near light rail."

Policy – P1.12 – Except as needed for ADA access, trail use must be limited to foot traffic only. In light of the planned increase in housing density, habitat must be prioritized and carefully nurtured (page 157). These impacts should be evaluated in the DEIS.

Policy P1.28 – What are foraging and agricultural opportunities? Does this refer to community gardens and old abandoned orchards? Which public green spaces does this refer to? Have the impacts of this policy been evaluated in any environmental document? Foraging must not be allowed in natural areas.

- Operations and Maintenance

According to the 2012 Seattle's Forest Ecosystem Values paper "Analysis of research plot data suggests that Seattle's urban forest removes 725 metric tons of pollutants annually, valued at $5.62 million. The i-Tree model estimates included five common pollutants: ozone (O3), sulfur dioxide (SO2), nitrogen dioxide (NO2), carbon monoxide (CO), and particulate matter less than10 microns (PM10)." Valued at $5.62 million in 2012 dollars.

"Seattle's urban forest stores approximately 36 metric tons of CO2 equivalent (or 9.9 metric tons of carbon) per acre and sequesters approximately 2.6 metric tons of CO2 equivalent (or 0.7 metric tons of carbon) per acre. Across Seattle, carbon storage in urban forest bio-mass amounts to almost 2 million metric tons of CO2 equivalent, with an additional 141,000 metric tons of CO2 equivalent sequestered in 2011. This equates to a citywide savings of $10.9 million from carbon storage and an annual savings of $768,000 from carbon sequestration. The urban forest CO2 removal rate per year is 2%, or 7 days, of the city's total annual emissions."

Missing is a policy on the importance of tree canopy preservation. Please add one.

Policies P 4.5-4.6 discuss working with the tribes.

> 4.5. Partner with and support Indigenous communities and individuals to incorporate Indigenous cultures, histories, values, and land management and stewardship practices in public spaces. Explore opportunities to return public land to Indigenous ownership.
>
> 4.6 Seek opportunities to create or repurpose public spaces specifically designed for Indigenous communities' use and cultural expression. Identify opportunities to integrate Coast Salish languages in public spaces, including naming spaces.

How was this done? What do the Tribes feel about the impact of the One Seattle Plan on canopy, and mature tree protection? How is their opinion factored into the One Seattle Plan and DEIS?

Other Comments on the Plan

We have reviewed the One Seattle Plan and One Seattle Plan DEIS and agree with the comments submitted by Gerry Pollet:

Tree Canopy and Climate; Tree Preservation and other Environmental Elements are Not Adequately Addressed in the EIS. Required Mitigation Measures to Achieve Policies are Not Addressed or Proposed in the Comprehensive Plan or SEPA Review / EIS.

The results from this failure to properly address the required climate change and tree canopy policies and lack of inclusion in the Plan and lack of analysis in the EIS are likely to be:

- a tremendous loss of mature tree canopy as the City falls further and further behind from its **adopted policy goal for 30% tree canopy coverage by 2037**;
- adverse health impacts from loss of tree and green space (particularly for overburdened or highly impacted communities);

○ health impacts will almost certainly include increasing mortality and hospitalizations of vulnerable populations due to projected increasing days of severe high temperature with the highest temperatures in residential areas that lack tree canopy and whose residents have the most adverse social determinants of health (e.g., overburdened and highly impacted communities and populations under the State HEAL Act).

- adverse impacts due to increased storm water runoff, including stream erosion, contamination entering surface waters, harm to salmon or fish habitat and recovery and biological diversity in surface waters and shoreline habitat,
- impacts on meeting legal requirements to reduce combined sewage overflows and lack of mitigation for increased runoff from increasing impervious surfaces from other plan policies.

[9] Housing Appendix page 16.

Mature trees in urban settings have been well documented to reduce stormwater runoff[10] as well as decreasing urban temperatures. As such mature tree canopy must be an important element of a climate change element under comprehensive planning to reduce the impacts of climate change and severe high temperatures, particularly in residential areas with lower and moderate income residents and older housing stock that lack air conditioners.

The findings of the City's own Tree Canopy Assessment were summarized by the City:

• **Canopy loss is not happening equitably.** Neighborhoods impacted by racial and economic injustice started with less canopy and lost more than the citywide average. Compared to

neighborhoods with greater advantages,[1] these neighborhoods had 31% less canopy in 2021, an increase in disparity from 2016 (when they had 27% less). While there were some canopy gains in environmental justice priority areas attributed to forest restoration programs, the losses outpaced the gains.

• **Tree canopy cover is critical for lowering temperatures and reducing heat island effects in our warming climate**. Trees are a key component of our climate preparedness and resilience strategies as they protect us from extreme heat and improve air quality. The report finds that, on a hot day, neighborhoods[2] with 25% canopy cover were 1 degree cooler than neighborhoods with no canopy. Industrial areas and major transportation corridors have lower canopy and warmer temperatures. These conditions were also found in some neighborhoods, such as in the Chinatown-International District and in the south end of Rainier Valley.

*"The data show we are further away now than we were five years ago from our goal of 30% canopy coverage**," said Jessyn Farrell, Director of Seattle's Office of Sustainability & Environment**. "To reverse this backward slide and achieve our vision of an equitably distributed urban forest in Seattle, our strategies must better align development and tree preservation and include innovative and equity-driven actions in planning, maintenance, planting, and engagement. In short, a healthy, thriving Seattle needs more housing and more trees and we can absolutely do both."*

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[10] For example, of the well documented reduction in storm water runoff associated with mature tree canopy in urban areas, see:
US Environmental Protection Agency resources: Center for Watershed Protection, Swann, Chris; Review of the Available Literature and Data on the Runoff and Pollutant Removal Capabilities of Urban Trees; 2017.
Michael Richter *ORCID, Kirya Heinemann, Nadine Meiser and Wolfgang Dickhaut ; Trees in Sponge Cities—A Systematic Review of Trees as a Component of Blue-Green Infrastructure, Vegetation Engineering Principles, and Stormwater Management; Department of Environmentally Sound Urban and Infrastructure Planning, HafenCity University Hamburg;
"Trees reduce stormwater runoff and soil erosion through direct retention on leaves and branches when they become wet (interception), runoff of water via the trunk (stem runoff) and infiltration through the soil [20]. Additionally, substrates filter pollutants from stormwater before it infiltrates into groundwater"
Citing:

Charles River Watershed Stormwater Association. Stormwater, Trees, and the Urban Environment. A Comparative Analysis of Conventional Street Tree Pits and Stormwater Tree Pits for Stormwater Management in Ultra Urban Environments. 2009.

Elliott, R.M.; Adkins, E.R.; Culligan, P.J.; Palmer, M.I. Stormwater infiltration capacity of street tree pits: Quantifying the influence of different design and management strategies in New York City. *Ecol. Eng.* **2018**, *111*, 157–166.

City of Seattle, *"Seattle Releases 2021 Tree Canopy Assessment Showing Slow Decline in Canopy Cover Between 2016 and 2021",* Viewable at this link.

The Draft EIS also recognizes that mature tree canopy reduces pollution in runoff, which is toxic to fish, in addition to the benefits in regard to heat and climate resiliency.[11]

Much of the mature tree canopy and habitat in Seattle's residential neighborhoods, which are home to nearly 50% of the tree canopy despite being a much lower percent of the total land area, are evergreen trees. Evergreen, including Douglas Fir and Cedar, are documented to intercept 27 to 66% of precipitation (preventing that from reaching the ground to be rapid runoff).[12] This is far more than deciduous trees.

Seattle's existing native mature tree canopy has a far greater percentage of evergreen trees, which intercept and prevent stormwater runoff, than deciduous. However, tree replacement, especially street tree planting, is primarily deciduous and of much smaller canopy, resulting in a far greater relative increase in stormwater runoff. Preservation of mature tree canopy in residential areas is, therefore, necessary mitigation to accomplish the City's Tree Canopy, Climate and runoff goals and policies.

HB 1181, Chapter 228, Laws of 2023 requires cities to incorporate climate change goals and elements in comprehensive plans. There is a concomitant requirement to address climate change impacts and related policies in the Environmental Impact Statement (EIS) accompanying the draft comprehensive plan.

RCW 36.70A.070(9) now requires that the City's Comprehensive Plan:
'must enhance resiliency to and avoid the adverse impacts of climate change, which must include efforts to reduce localized greenhouse gas emissions and **avoid creating or worsening localized climate impacts to vulnerable populations and overburdened communities."**

(emphasis added).

Neither the Plan nor the Draft EIS adequately consider how the loss of tree canopy, which has already been documented by the City, and which will accelerate under the proposed Plan, will result in increased "heat islands" and adverse health effects on vulnerable populations and overburdened communities from reducing tree canopy. Indeed, the Plan and EIS are required to have strategies to reverse the documented loss of tree canopy reflected in Seattle now being further from its goal than when the goal was adopted.

The Climate section of the draft Plan refers to a Climate and Environment Policy CE 9.3[13]:

"Expand tree canopy and greenspace, especially in communities that experience disproportionate impacts of extreme heat and smoke events."

[11] Draft EIS Vol 3 Page 3.3-3.
[12] Center for Watershed Protection. 2017. Review of the Available Literature and Data on the Runoff and Pollutant Removal Capabilities of Urban Trees. Crediting Framework Product #1 for the project Making Urban Trees Count: A Project to Demonstrate the Role of Urban Trees in Achieving Regulatory

Compliance for Clean Water; at 4.
[13] Plan at page 147.

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As I quote the City's own findings, the City is losing tree canopy. Thus, a plan is required along with analysis of alternatives and mitigation measures to not only stem the loss but to "expand" tree canopy. No plan is presented.

The Tree Canopy section is devoid of any plan or meaningful discussion. Most notable, there is no plan or discussion relating to how the development goals will be coordinated with proactive policies to preserve and increase mature tree canopy in residential areas, where most of the tree canopy, and most of the risk for loss of canopy under the Plan will occur.

Policy CE 12.6[14] refers only to City property and street tights of way which cannot meet the goals:

Preserve, restore, maintain, and enhance tree canopy on City property and rights-of way.

Street trees offer far less of the benefits than large mature trees. CE 12.8 recognizes this with a policy goal:

Encourage the protection, maintenance, and expansion of tree canopy throughout the community, prioritizing residential and mixed-use areas with the least current tree canopy to equitably distribute benefits.

How will the City "encourage" protection, maintenance and expansion of tree canopy?

Mitigation is required for specific climate, environmental and human environment (including environmental justice) policies that are adversely impacted by competing policies.

The Draft Plan and EIS fail to adequately address that it is not possible to retain or replant trees when the land area is covered by new structures. The Seattle Comprehensive Plan should follow Portland's example by acknowledging that the only means of achieving 30-percent equitable citywide canopy cover is to designate at least 30% of the residential lot area with space for trees.

The DEIS discusses the in-lieu fee program which may result in increasing tree canopy in overburdened communities that currently have less than 25% tree canopy.[15] While this may provide vitally important benefits, cutting trees in one area while replacing them with new trees that require approximately $5,000 for their first four years of survival is untested and does not account for the reality that it would take many years for the new trees to provide the same net benefits of the cut trees. Nor does the City consider the reasonably foreseeable adverse impacts on the areas (and streams) that will lose tree canopy.

The Draft EIS and plan do not consider the reasonable alternatives for revising the City's Tree Ordinance, including measures which would assist in reaching the goal or reducing loss of canopy, such as applying the ordinance evenly to all areas / zones in the City.

[14] Plan at page 150. [15] DEIS page 3.3-28.

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The Draft EIS explicitly states that none of the alternatives considered include any proposal to improve regulation or incentives to reduce the pace of tree canopy loss, much less to reverse and make progress towards the goal of having 30% canopy coverage by 2037:

Under any of the alternatives, the potential for adverse effects on plants and animals would be avoided, minimized, documented, and mitigated to the greatest extent possible through regulatory reviews and permitting processes that apply to individual projects (see Section 3.3.3). None of the alternatives propose any modifications to those processes.

Draft EIS Section 3.3.2 at page 3.3-13.

The Draft EIS does not even acknowledge that many of the housing projects which might adversely affect the tree canopy retention policies will be exempt from further SEPA review under the City's adopted categorical exemptions. This will preclude consideration of area specific or cumulative impacts from multiple individual developments authorized under the Comprehensive Plan and Development Ordinances.

The Draft acknowledges the obvious: that the existing tree ordinance and policies are failing, as shown in the loss of canopy.

But, without any analysis, the DEIS asserts that the new tree ordinance will reverse this. However, the City refused to do an EIS or new analysis on the drastically revised ordinance that the Council passed. Thus, there is no analysis or basis for statements that the new ordinance will improve performance towards the goal. Further, the DEIS acknowledges that the new ordinance anticipates replacing mature canopy with street trees.[16] SEPA requires environmental analysis of the impacts – and mitigation measures – for such a switch since the record establishes that street trees cannot replace the heat, habitat, stream protection and stormwater benefits of mature trees.

To reflect the adopted Tree Canopy goal and required climate change element, and SEPA requirements for mitigation to achieve polices, the Comprehensive Plan and EIS should:

- explicitly include increased height bonuses or adding other residential unit area for preserving the entire tree canopy space required to keep existing significant trees healthy;

- include mitigation measures to apply the same tree protections and requirements for retention and permitting / review for removal by existing property owners to all new development in residential zones;

- adjust FAR ratios for each zone, to accommodate tree preservation;

[16] DEIS page 3.3-13 and 14: Stating that the existing tree ordinance "did not prevent development and redevelopment projects from contributing to tree canopy loss. After that study was completed, however, the City updated its regulations to implement stronger tree planting requirements and to require street trees to be planted as part of development in Neighborhood Residential zones. With the current regulations, it is expected that a substantial amount of development-related loss of tree canopy would be reversed over time as replacement trees grow larger. Since some tree placement would occur off-site through the fee-in-lieu option, this could also result in a shifting of canopy cover onto public property and the right-of-way where the City might have more control over tree establishment and maintenance."

This is speculation without any analysis of the potential adverse effects or mitigation measures to ensure that the City would even meet its own expectations.

commit to requiring that the height bonus be utilized rather than merely being an option, as under current code, for developers to save significant trees by increasing development height or square footage elsewhere above what would otherwise be allowed to compensate for the area of the development reduced to ensure that significant trees on the property or adjacent properties are preserved and healthy.

E.g., developers of a five story building currently have a choice to remove a tree in the proposed building envelope, or to save the tree and add replacement footage. Mitigation and commitment to the Seattle Tree Canopy Goal and required Climate goal per HB 1181, Chapter 228 Laws of 2023, should result in the Plan and mitigation commitments under SEPA including this change which honors both increased housing unit goals and climate and tree preservation policies.

- Provide examples of developments that meet increasing housing goals (including reflecting the requirement to allow various types of housing with four to six units per lot, depending on location) while preserving healthy existing mature trees on a development lot;

- Commit to adoption of an ordinance adjusting lot split and short plat lot lines to maximize preservation of existing mature trees as an element of required mitigation and commitment to the City's tree canopy and climate goals.

- Commit to increasing height for residential units in regional and neighborhood centers and expanding those centers along the entire arterials that have infrastructure completed or committed to for both light rail and bus rapid transit with the 800 foot walkable diameter zone (and fully consider on a local basis whether to expand each from three blocks / 800 feet to a quarter mile / five blocks with decreasing height and FAR moving away from the transit stop; and, couple this with the tree preservation mitigation elements above to prevent this expansion from adversely affecting climate resiliency due to loss of further mature tree canopy.

- Include consideration of potential mitigation requiring both street tree planting and small pedestrian or child friendly public access areas with larger shade trees within developments close to transit. Adjust the FAR to include increased height potential for meeting a required inclusion of plazas with trees, seating areas and play structures.

Park considerations: if the City moves to include specifically increasing height and housing units based on proximity to parks as an equity issue, then the EIS must address how increasing height and development FAR (requiring greater lot coverage) will impact natural habitat within the park boundaries. This must include mitigation measures to ensure that development close to park boundaries will not adversely affect either the tree root system or tree canopy habitat for trees within the park, habitat for birds and bats, light pollution in the park, the effect of shade and blockage of sunlight. The EIS would also have to address impacts from loss of sunlight and other impacts on parks that are primarily recreational. The consideration of increased density near parks should differentiate between natural areas and recreational areas (i.e., ball fields, courts, lawns, play areas).

Increased housing density that is explicitly based on increasing equitable access to parks should include a **change to HALA policies to require inclusion of affordable units of housing in new developments** taking advantage of increased density requirements. Equity and improving access to the benefits of parks requires adoption of policies to ensure that a significant number (20-25%) of housing units serve the City's goals to provide affordable housing for persons (and family units) at the <30%, < 60% and < 80% AMI levels.

Increasing the height and development potential (FAR) next to parks would be a windfall for developers. The value and market rent or sale value of units next to parks, especially with a view of preserved public park space, is far above that of other properties. If developers are going to be given such a potential windfall, there needs to be a requirement that a significant number of the units are dedicated to lower income residents and working families.

We have reviewed the One Seattle Plan and DEIS and agree with comments of Friends of Seattle's Urban Forest:

The following comment is in regards to legislation passed last year on Comprehensive Plan requirements

1. In the Climate and Environment Section, p 149, of the draft One Seattle Comprehensive Plan, the heading **Tree Canopy**, should be changed to **Urban Forest and Tree Canopy.**
2. Discussion - Seattle's **urban forest** and tree canopy is fundamental...

Rationale for adding urban forest is legislative amendments noted in text below. Highlighting is mine (SZ) for pointing out specific sections. Underlined areas are new to the 2023 legislation.

The Washington State Legislature in 2023 passed E2SHB 1181 - AN ACT Relating to improving the state's climate response through updates to the state's planning framework.

Section 1.(14) Climate change and resiliency. Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions

in greenhouse gas emissions and per capita vehicle miles traveled; **prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice. ...**

Section 3(3) The comprehensive plan of a county or city that is required or chooses to plan under RCW 36.70A.040 shall consist of a map or maps, and descriptive text covering objectives, principles, and standards used to develop the comprehensive plan. The plan shall be an internally consistent document and all elements shall be consistent with the future land use map. A comprehensive plan shall be adopted and amended with public participation as provided in RCW 36.70A.140. Each comprehensive plan shall include a plan, scheme, or design for each of the following: (1) **A land use element designating the proposed general distribution and general location and extent of the uses of land, where appropriate,** for agriculture, timber production, housing, commerce, industry, recreation, open spaces **<u>and green spaces, urban and community forests within the urban growth area</u>**, general aviation airports, public utilities, public facilities, and other land uses. The land use element shall include population densities, building intensities, and estimates of future population growth. The land use element shall provide for protection of the quality and quantity of groundwater used for public water supplies. **<u>The land use element must give special consideration to achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities.</u>** Wherever possible, the land use element should consider utilizing urban planning approaches that promote physical activity and reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state. **Where applicable, the land use element shall review drainage, flooding, and stormwater runoff in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state, including Puget Sound or waters entering Puget Sound.** The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools, which may include, but are not limited to, adoption of portions or all of the wildland urban interface code developed by the international code council or developing building and maintenance standards consistent with the firewise USA program or similar program designed to reduce wildfire risk, reducing wildfire risks to residential development in high risk areas and the wildland urban interface area, separating human development from wildfire prone landscapes, and protecting existing residential development and infrastructure through community wildfire preparedness and fire adaptation measures.

2nd change - In the Land Use Element General Development Standards:
Policies L.U.4.8 add underlined words.

Urban forest and tree requirements to preserve and enhance the City's physical, aesthetic and cultural character and to enhance the value of the trees and urban forest in addressing stormwater management, pollution reduction, climate resiliency and heat island mitigation.