



August 22, 2022

Office of Planning and Community Development
Seattle City Hall
600 4th Ave
Seattle, WA 98104
submitted via One Seattle Plan Engagement Hub

RE: Establishing obligations and responsibilities to biodiversity and other comments on the 2024 Comprehensive Plan EIS Scoping Alternatives

Dear Office of Planning and Community Development,

Seattle Audubon* advocates and organizes for cities where people and birds thrive. The 2024 Comprehensive Plan update process is an exciting opportunity for Seattle to clarify its vision for healthy communities, lands, and waters. In addition to supporting comments already submitted by many others (see below), we recommend and further elaborate on the following:

1. Establishing equitable biodiversity conservation as an intention of Comprehensive Plan update;
2. Assessing how EIS alternatives and climate change would impact biodiversity; and
3. Considering how climate change interventions might affect biodiversity, and vice versa.

Seattle's biodiversity provides services and benefits to people.

We love living and working in Seattle. The landscape is beautiful. The culture is vibrant. And the diversity of life we can experience every day is wild. From Orca off Alki to Bald Eagles over Ballard, our neighborhoods and waterways are peopled with more than people: at least 2,800 species of plants, fungi, birds, and other wildlife have been documented to-date within Seattle's municipal boundaries (iNaturalist.org, 2022).

The plants, fungi, and animals we share our neighborhoods with make up our urban biodiversity. This biodiversity underpins the function of our urban ecosystem and provides services to the people who live in and visit Seattle—including food production, air purification, pest control, reduced need for cooling and heating, opportunities for recreation, and more.

Nature also promotes human health and wellbeing (see Hartig et al., 2014 for a review). For many of us in Seattle, our daily contact with nature occurs in urban public green spaces. The degree to which green spaces provide people with physical and psychological benefits depends on many attributes, including park size, location, tree canopy, general quality, and amenities like bathrooms and benches (Konijnendijk et al., 2013). Higher levels of biodiversity in green spaces

* In July 2022, we announced our intention to remove "Audubon" from our organization's name. Learn more at www.seattleaudubon.org/name-change



may also play a role in reducing stress and promoting feelings of restoration (Fuller et al., 2007; Wood et al., 2018, Schebella et al., 2019, Houlden, Jani & Hong, 2021).

The benefits of Seattle’s biodiversity are not equitably distributed and may be declining.

The benefits of nature, biodiversity, and ecosystem services are not equitably distributed across Seattle. Generally, more affluent neighborhoods and those with predominantly white residents have greater vegetation cover, canopy cover, and biodiversity (Schell et al., 2020). This did not happen by accident. Redlining and other racist policies determined not only where people can live, work, and play, but also how vegetation is planted and maintained. This, in turn, affects the distribution and movement of other living things in the city. We have the opportunity and responsibility to address these inequities in the 2024 Comprehensive Plan update.

Like all ecosystems, cities change. In the last decade, we experienced the greatest average annual population growth since the Klondike Gold Rush. We’ve set new weather records for high temperatures, days without precipitation, and smoke storms. Our urban biodiversity is changing, too. Some species, like Yellow-faced Bumblebees are becoming more common. But populations of many others are in decline, including 52 percent of bird species that regularly occur in King County (Rosenburg et al., 2019, supplemental data). Like many places around the world, the capacity of Seattle’s natural systems to support life may be deteriorating.

We urgently need integrative policy to halt climate change and biodiversity loss.

Climate change and biodiversity loss are the two most urgent environmental challenges of our times (Pörtner et al., 2021). The City of Seattle has devoted considerable resources to climate change policy, developing a Climate Action Strategy and at least five city ordinances and resolutions with “climate change” in the title (City of Seattle, 2022), including the recently adopted Resolution 32059 committing the City to address climate change and improve resilience as part of the One Seattle update to the Comprehensive Plan.

Biodiversity loss, which has potential consequences for humanity that rival climate change (Cardinale et al., 2012), has received much less attention by the City of Seattle. We have no citywide strategy for managing biodiversity. We have no city ordinances or resolutions with “biodiversity loss” in the title. Our Climate Action Strategy does not reference biodiversity or wildlife. And while the current version of the Comprehensive Plan (November 2020) contains goals and policies for protecting and restoring the natural environment, biodiversity is not defined or used as a concept.

The scientific community is calling decision makers to integrate climate change and biodiversity on policy agendas (Roberts, O’Leary & Hawkins, 2020; Pettorelli et al., 2021; Pörtner et al., 2021). With “environmental stewardship” as a core value of the 2024 Comprehensive Plan update, we urge the City of Seattle to use this opportunity to begin building an integrative policy framework



that equitably addresses climate change and biodiversity loss. Again, our specific recommendations at this stage of the EIS process are:

1. Establish equitable biodiversity conservation as an intention of Comprehensive Plan update;
2. Assess how EIS alternatives and climate change would impact biodiversity; and
3. Consider how climate change interventions might affect biodiversity, and vice versa.

1. **Establish equitable biodiversity conservation as an intention of Comprehensive Plan update.**

As Seattle City Council did with climate change in Resolution 32059, the City's intention to conserve biodiversity should be established at the outset of the Comprehensive Plan update process.

The City of Seattle should study and develop new and revised goals founded in science that include, but are not limited to, the following:

- a. Ensuring equity in actions to address climate change, biodiversity loss, and the use of benefits of biodiversity, including:
 - i. Accounting for the needs of children, youth, and future generations.
 - ii. Sharing the benefits and burdens of biodiversity in a way that is equitable, transparent, and accountable.
 - iii. Collaborating with communities to co-create and implement plans for climate action and biodiversity conservation that are in accessible languages, provide for public participation, and that prioritize removing the barriers faced by Black, Indigenous, and People of Color, children, people with disabilities, and other systemically under-resourced people.
- b. Recognizing and implementing city-level obligations and responsibilities to biodiversity, including:
 - i. Protecting currently existing biodiversity in natural areas, parks, and open spaces.
 - ii. Planning explicitly for open spaces and natural habitats during new development.
 - iii. Using a variety of arrangements of built and open space to meet a diversity of ecological requirements.
 - iv. Enhancing and restoring habitat within existing natural areas, parks, and open spaces.
 - v. Improving habitat quality within the matrix of urban land uses rather than focusing only on management within natural areas, parks, and open spaces.
 - vi. Reducing urban hazards to biodiversity, including pesticides, reflective glass, plastic pollution, and harmful impacts to biodiversity of human-associated species like free-ranging outdoor cats.



- vii. Embracing the novelty of urban habitats and species composition to create ecosystems that meet needs of people, biodiversity, and are adaptive to climate change.
- viii. Celebrating urban biodiversity to foster connections between people and the natural heritage of their local ecosystems.
- c. Determining the status and trends of biodiversity within Seattle’s jurisdiction, including:
 - i. Documenting the richness and distribution of currently existing biodiversity.
 - ii. Identifying rare or limited habitat types, such as native prairies, bogs, and other wetlands.
 - iii. Identifying existing and potential habitat corridors that facilitate safe movement of organisms between natural areas, parks, open spaces, and other habitat areas.
 - iv. Selecting established indicators of urban biodiversity, such as the [City Biodiversity Index](#).
 - v. Monitoring and evaluating changes in Seattle’s biodiversity indicators over time.
- d. Confronting and addressing human-nature conflict in cities, including:
 - i. Examining both the services and disservices of biodiversity to understand how, when, where, and why urban biodiversity can be viewed as unpleasant, dangerous, or destructive.
 - ii. Cataloging effective solutions to conflicts.
 - iii. Planning, designing, and communicating to address conflicts or reduce fears.
- e. Creating resilient landscapes, including:
 - i. Considering the needs of biodiversity early in urban planning and development projects, rather than as “add-ons” if space or budget allow.
 - ii. Monitoring and managing for climate related impacts on biodiversity, including new pests and pathogens.
 - iii. Testing and evaluating new designs of nature-based solutions across urban typologies, together with their financing models and policy mechanisms.
- f. Co-producing knowledge with Indigenous peoples for bringing biodiversity in cities, including:
 - i. Funding and supporting Indigenous practices and learning-focused urban experiments with Indigenous communities for climate action, nature stewardship, and appreciation.
- g. Reconnecting people with biodiversity in cities through community science and engagement programs.

[the above adapted from United Nations Environment Programme, 2021; Marzluff & Rodewald, 2008; and Oke et al., 2021]



2. Assess how the EIS alternatives and climate change will impact biodiversity.

Development patterns strongly impact patterns of biodiversity in cities. Building mass, lighting, noise, traffic, population density, impervious surfaces, tree canopy cover, area of open space, and other features of the built environment all impact the distribution and movement of organisms in and through cities. Climate change is shifting the ranges of many plant and animal species and exposing them to additional stressors that may threaten their survival. For instance, at least 108 bird species in King County are at increased risk of extinction due to climate impacts (National Audubon Society, 2019). We ask you to evaluate the potential impacts of each EIS alternative on the city's capacity to support diverse plant and animal communities given the anticipated impacts of climate change. We also ask that you evaluate the equity of biodiversity distribution under the various alternatives. How do the alternatives compare in providing equitable access to the benefits of future biodiversity?

3. Consider the impacts and synergies of climate change interventions on biodiversity, and vice versa.

Biodiversity loss and climate change are often treated separately. But they are related and mutually reinforcing issues. We need policies that tackle both problems simultaneously. While actions to halt biodiversity loss generally benefit the climate (Shin et al., 2022), a siloed approach risks advancing climate solutions that can negatively impact biodiversity. For example, afforestation on lands that were never forested can reduce biodiversity in an area, and decisions about where to site clean energy infrastructure, including solar panels within cities, can impact biodiversity. Please consider how proposed interventions impact both climate and biodiversity.

We also note our support for many comments that have already been submitted, including from [Share the Cities](#), [Affordable Talaris](#), [Real Change](#), and Seattle's Urban Forestry Commission.

Sincerely,

Joshua Morris
Urban Conservation Manager

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