

Urban Forestry Commission (UFC)

Special Meeting on Tree Ordinance

October 20, 2010

Meeting Notes

Seattle Municipal Tower Room 2240

700 5th Avenue, Seattle

3:00 p.m. – 5:00 p.m.

Attending

Commissioners

Matt Mega – vice chair (MM)

John Hushagen (JH)

Kirk Prindle (KP)

Jeff Reibman (JR)

Peg Staeheli (PS)

Staff

Sandra Pinto de Bader (SPdB) - OSE

Absent- Excused

Elizabetha Stacishin-Moura

Gordon Bradley

Nancy Bird

John Small

Call to Order, Approval of October 13 meeting notes

Only four commissioners were present at the beginning of the meeting. Without the required quorum to have a vote, it was decided to begin public comment and allow for additional time for other commissioners to arrive.

Approval of October 13 minutes was moved to the next regular UFC meeting November 3, 2010.

Public Comment

Steve Zemke

- Concerned about the infrastructure component being approached from an economic sense only and not from an ecosystem perspective, considering bio-diversity and trying to maintain it in the city. This should be a critical factor in the final document.
- There is a book by an entomologist in New Jersey that talks about diversity of bird species and insects as important to maintain an ecosystem.
- Letter needs to deal with non-native plants and the impact to our ecosystem.
- Define canopy in terms of physical areas is not enough.

- Look at canopy volume as a component of the 30% cover. We could get there with maples, cherries and small street trees but that would cause loss of habitat throughout the city.
- Need to discuss evaluation of incentives
- Issue of potential benefits of posting removal and permit system to reduce the number of boundary line disputes. People are better able to react.
- Page 5 about posting – needs to be a more declarative sentence
- UF/DPD and 9 city departments: need to hear departments’ comments directly. UFC needs to instigate a meeting with all the departments.
- Letter doesn’t mention the issue of the auditor recommendation regarding forestry oversight residing in a single department
- This tree ordinance applies to public and private sector
- When people ask for number of trees planted vs. cut down, find out actions of city departments in this arena.

Michael Oxman

He sent out an email responding to the Park’s budget cutting a tree trimmer and tree trimming lead. Pruning cycle would go from 17 to 22 years. There is no parks tree inventory so how can it be said that there is a cycle? Pruning a portion of a tree is not treating the tree as a whole. Where are locations of trees removed by parks last year? If they had maps to present to UFC or the Parks board and had correct records, many questions could be answered. Red maples are common and easy to maintain but they would become a mono-culture. The budget should be proactive. Let’s see a map of 5-year-old maples that haven’t been pruned. Good management of trees extends their life. It’s important to plant trees where they can grow. The city has four different formats to keep records. Are these records available? Can we assume a reasonable tax base to pay for different systems? Can we see a tree work order from the city? A request for city staff would be to present a report of the urban forest in the city to determine our cost and figure out what the correct budget would be.

Letter to Council regarding DPD Proposal and the new Tree Ordinance - vote

A discussion on comments to the current version of the tree ordinance letter to council began with only four commissioners present.

JH – not every 6” DBH tree is worth protecting

KP – the 6” threshold would be to require a permit

JH – model the permit system on what nearby cities have done.

JR – all trees are not created equal

MM – had this discussion. He used thresholds for the letter and once the permit is written we can get into details. Proposes to change the term to ‘most trees’

KP – is concerned about a different diameter for arborist consultation

JR – likes the simplicity of saying over 6” you do this, over 18” you do that. It’s clear for people to understand. But what does a permit mean? Simply print at home and then proceed to cut the tree down? Or will it be an arduous process? Should be simple and focused on tracking. It would be beneficial to get the city involved when we are dealing with trees 18” and above and make it more burdensome for people to cut.

KP- issue with variable DBH is that makes regulations confusing. Use the same DBH uniformly.

JR – make it clearer whether it’s at a lower level –not a burden. If it’s a larger tree then city gets involved.

JH – the pitfall of having a certified arborist is that there is a conflict of interest if they will also provide the removal service. Have consultants that will offer knowledge. There are different levels of arborists (even if they are certified).

JR – when a consulting arborist gives the homeowner a price that’s a good opportunity for the homeowner to think about removing or not.

MM – We could generalize more. Maybe include consultation with a city arborist to begin informing homeowners.

JH – the problem is that we have hopelessly underfunded city forestry services.

JR – keep 18” and remove 24”

Peg Staeheli arrived, giving the UFC the ability to vote.

KP – would like the letter to say that DPD has refused to release information on public meetings to the public or the UFC

PS – believes this tone would create unnecessary tension

After additional comments that were captured directly into the letter being worked on, a break was requested for MM and staff to make amendments and provide a new letter to submit for vote.

A motion was made, seconded, and unanimously carried to adopt the final letter to council regarding tree protection ordinance. (text below)

Seattle Urban Forestry Commission

Elizabetha Stacishin-Moura, Chair • Matt Mega, Vice-Chair • Nancy Bird • Gordon Bradley
John Hushagen • Kirk Prindle • Jeff Reibman • John Small • Peg Staeheli

October 20, 2010

Honorable Council President Richard Conlin
Chair, Regional Development & Sustainability Committee
Seattle City Council
PO Box 34025

Seattle, WA 98124

RE: DPD's Proposed Tree Regulations Follow Up

Dear Council President Conlin,

On July 14, 2010 the Department of Planning and Development (DPD) released the City of Seattle Proposed Tree Regulations document. Public comment for this proposal will end on October 31, 2010. On August 13, 2010 the Urban Forestry Commission provided Council with an initial letter stating our concerns with the proposal as released. Our letter today reiterates those concerns and provides detailed suggestions on how to move forward with the process in a positive and constructive manner. While there are concepts in the proposal that we do support, there are several elements that need further refinement and others that need to be added and/or re-evaluated. Our comments are divided into three broad categories:

1. Process (both public and internal)

- A more inclusive public process is needed
- Public comment period needs to be extended
- City Departments, such as City Light, SPU, Parks, and Department of Neighborhoods need to provide written input
- The Urban Forestry Commission needs to be engaged more constructively
- Arborists and those with specific urban forest responsibilities need to be engaged more constructively

2. Goals of an effective tree protection ordinance

- Promote a healthy urban forest across the city
- Elevate and recognize the urban forest as critical infrastructure
- Provide stronger protections for larger trees
- Ensure public education and outreach is integrated into the release and implementation of the tree protection ordinance
- Ensure a comprehensive urban forest management approach
- Recognize ecosystem value and wildlife habitat
- Formally adopt and implement the Urban Forest Management Plan

3. Tools for implementing an effective tree protection ordinance

- A permit system to manage, slow down, and document tree removal
- Professional standards to ensure safe and competent removal of trees
- Tree planting and protection standards to establish best practices
- Development standards to mitigate the impacts of increased density
- Mitigation standards to minimize impact and ensure canopy growth over the long-term

We hope this letter helps Council evaluate the proposed regulations as we move toward ordinance development. Specifically we feel Council should consider the following changes to the process.

1. **Slow the process down by three to five months** allowing the City agencies to fully discuss and incorporate the comments received, complete additional research, and engage the public and the Urban Forestry Commission on ordinance details.
2. **Hold a series of Townhall meetings** that engage the public in meaningful conversation about the urban forest and specific elements of the proposed regulations.
3. **Have DPD work with the Urban Forestry Commission** to vet the issues and determine the feasibility and methods of incorporating the Commission's recommendations into DPD's portion of the final Tree Protection Regulations.

Below we provide a more expansive explanation of our main points.

Process (both public and internal)

More inclusive public process and more engaged internal process

To date, only one open house has been held by DPD (September 21, 2010 at City Hall) to gather general feedback from the citizens of Seattle. DPD did present the tree proposal to a variety of 'standing' groups, but the comment period will end on October 31 without sufficient citizen representation. We are recommending Council provide additional opportunities for public comment to address specific recommendations of Resolution 31138 not included in the proposal. In addition, the Commission recommends a more inclusive internal process that engages other City Departments and this Commission not only in commenting on the proposal but also providing elements and language that should be added. Significant weight should be given to the input of city arborists in this process.

To date the process has followed a typical internal document creation methodology by DPD with a complete unveiling of a single document to the Mayor, to Council, to the Urban Forestry Commission and to the public all at once. DPD should consider a more iterative process where the large complex pieces of the regulations can be discussed in some depth. For instance, once DPD decided against the permit system this knowledge should have been vetted through the Urban Forestry Commission. The removal of a permit system, the exceptional tree element, and the three trees per year requirement all caught the Commission off guard. DPD could have and should have briefed the Commission and the Council on their thoughts regarding these major changes before going public with a proposal.

Goals of an effective tree ordinance:

Healthy Urban Forest Across the City

A healthy urban forest is comprised of a sustainable mix of trees and shrubs of various species, ages and geographic distribution. It includes valuable large trees and tree groves as healthy wildlife habitat. It also provides a consistent distribution of large trees throughout the city for equitable access. The monetary and habitat values of a vibrant urban forest should be measured and promoted.

Elevation of Trees as Infrastructure

The understanding that trees are critical urban infrastructure has most certainly grown over the last few years. However, the Commissioners believe more needs to be done. Specifically the tree protection ordinance needs to be more explicit in its acknowledgment of the monetary and public health benefits of a healthy urban forest. For instance, the cost-benefit analysis on whether or not

to implement a permit system in the DPD proposal only took into account the direct cost to city staff budgets, but did not account for the monetary benefit accrued by the ecosystem services provided by a healthy urban forest or potential for revenue generation by a permit system. A permit system which reduces the premature removal of trees will save money in stormwater management and air pollution mitigation.

Provide Stronger Protections for Larger Trees

Large trees provide more benefits than small trees. The City needs to be cognizant that if we shift our urban forest from one of more mature higher value trees to one of smaller more ornamental trees, the City will lose significant ecosystem function and benefits. The Exceptional tree element has been removed by DPD, but the Commission feels strongly that some element needs to be added to address the desire to protect large mature trees, especially native deciduous and native conifers.

Public Outreach

Public outreach while not explicitly part of the tree protection ordinance is still an integral component of the process. DPD has proposed removal of all regulation of trees on private property outside of development. It's important to understand that only one half of one percent of properties are developed in any typical year, leaving over 99% of the private land in the city unprotected. The DPD proposal, as written, could shift costs and responsibilities to preserve, enhance, and maintain the urban forest on to other city departments. For instance, canopy loss on unregulated property will require increased planting in city right-of-way and public property, increasing the city's long term maintenance burden. DPD does not plant trees, nor maintain trees. Will the new regulations create unintended financial consequences on those city departments required to ensure the 30% canopy goal is met through tree management and planting?

Comprehensive Urban Forest Management

To ensure successful protection and enhancement of the urban forest, the City of Seattle must look at the urban forest in a comprehensive manner. From the perspective of the tree protection ordinance itself this means an equitable ordinance with clear compliance and equitable mitigation requirements. It means that there needs to be a strong enforcement mechanism with punitive measures as a deterrent. From the larger perspective it means the city must implement the tree protection ordinance and all other urban forest efforts efficiently.

Recognize Ecosystem Value and Wildlife Habitat

A key ecosystem value provided by the urban forest is the preservation of valuable wildlife habitat and biodiversity. An interconnected urban forest canopy can enhance wildlife corridors throughout the city and the region.

Formally Adopt and Implement the Urban Forest Management Plan (UFMP)

By ratifying the UFMP and the 30% tree canopy cover goal and the mechanisms within the UFMP to meet this goal, the Council will signal their commitment to our City's urban forest and provide a tangible goal to evaluate the effectiveness of the tree protection ordinance against. Implementation of the tree ordinance and achieving the City's 30% canopy goals requires that a realistic budget be created, approved and sustained.

Tools for implementing an effective tree protection ordinance:

Permit System

The DPD proposal spent significant time refuting the feasibility of a permit system. Its conclusion relied heavily on additional costs and their determination of effectiveness. The Commission disagrees with DPD and recommends that Council take another look at the permit system and its feasibility for Seattle. Specifically, we recommend a full cost accounting that looks at the potential cost savings benefits of a permit system as well as the costs. The city of Atlanta's Arboricultural Manager confirmed that the city receives close to \$1 million dollars a year from permits and fees as part of their urban tree protection efforts. We would like to see DPD follow up on these reports to determine if Seattle, a city similar in size to Atlanta, can in fact implement a cost effective permit system.

Below are five distinct advantages the Commission feels a permit system will bring to Seattle. If the city decides against a permit system it must decide how to achieve these benefits or we will not meet our canopy cover goals.

- **Comprehensive Urban Forest Management:**
A permit system provides a mechanism for urban forest management, closing the gap in protection for private land outside of development. Comprehensive protection of Seattle's urban forest cannot be guaranteed without a permit system to formally and equitably manage tree removal in the city.
- **Tracking:**
Knowing exactly when, where, and what type of trees are being removed in the city is a vital tool to measure progress toward the canopy cover goals. Under the proposed DPD changes, private landowners have no requirements to meet before removing a tree. At the very least this could lead to unsafe removal that puts neighbors or the public at large in danger. There is no method of even volunteer registration of tree removal or planting.
- **Public Education**
The permit application process is an opportunity to give a homeowner pause and promote alternatives to removal. In some cases posting to inform neighbors of removal plans may also be warranted.
- **Enforcement**
The current complaint-driven enforcement system would function much better in conjunction with a permit system. Citizens or staff could easily check to see if a permit was obtained. When a tree is removed without a permit or based on incorrect information, the penalties can be straightforward and easily collected.
- **Recognition of Value and Benefits**
As part of DPD's case against a permit system, they equated permits with the permanent protection of certain trees and the burden it would place on citizens. The Commission believes that a simple online permit system would be sufficient in many cases and could easily reduce the cost to DPD and the burden to citizens. The protection of large trees is part of the UFMP, but so is the removal of hazard trees. Many trees eventually become too big for their space in the urban environment and in some cases require removal for safety. Public safety is often cited as a primary reason permits are currently required for sewer work, fixing retaining walls, building high fences, electrical work, building decks and many other activities.

A permit system will help elevate trees to urban infrastructure status and ensure that the work is being done safely and efficiently by trained professionals. A permit system may or may not be the best method for Seattle, but we believe DPD needs to do a better analysis than simply concluding it costs too much and burdens citizens.

Specifically we recommend a permit or registration system that incorporates the following elements:

- Online access with the ability to apply and print documentation from home
- Collect tree and parcel information appropriate to homeowner understanding
- An education component that promotes options to removal and programs for replacement
- A mechanism to stop people from unknowingly removing trees illegally such as street trees they may think they own
- A public posting period to allow public input
- Size and location thresholds above which a certified arborist must be engaged to do the work. We recommend that most trees over 6" DBH (diameter at breast height measured at 4.5 feet above the ground) require a permit and that most trees over 18" require a certified arborist's consultation
- Emergency approval mechanisms for removing diseased trees which pose a threat to the larger urban forest

Professional Standards

One of the key ways to ensure safe removal or pruning of trees is to require professional standards. Currently, the only qualification that the City requires of tree companies and arborists working for private clients is a business license. To ensure the implementation of an effective tree ordinance the city needs to be diligent in who is doing the tree work and the professional standards that should be required. Tree care professionals are also more inclined to suggest pruning options versus total removal. Enforcement and damages for improper work by professional companies should be part of the ordinance.

We recommend that the ordinance establish the following:

- Thresholds above which all work must be done by a certified Arborist. We recommend that most trees over 6" DBH require a permit and that most trees over 18" require a certified arborist's consultation
- Professional registration of Arborists working in the city
- Strong penalties for those who violate the tree protection ordinance as part of their business practice

Tree Standards

In order to promote the establishment of a healthy and diverse urban forest the ordinance should require appropriate tree selection and proper planting and maintenance standards.

We recommend that the ordinance require best practices and establish by secondary documents such as planting details and specifications, maintenance and protection standards and approved tree selection lists.

Development Standards

The current proposed regulations do have some good elements to minimize tree removal on parcels undergoing development. Some of these elements, like the tree credit system need to be further refined before a complete evaluation of their effectiveness can be made.

- **Tree Credit in Single-Family Zones**

The proposed tree credit for single family zones may be a viable approach. The proposed credits however do not place enough weight or incentive on tree preservation and it is unlikely that a tree would be preserved under new construction or major renovation. As written, the tree credit system is most likely to lead toward a reliance on small caliper trees and not achieve the desired goal of promoting and protecting large mature trees. The Commission also would like to see a better approach to the protection of conifer and native trees within the credit system.

- **Green Factor for Multi-Family and Commercial**

The proposal refers to monitoring the 2009 revisions to the Green Factor for effectiveness in tree preservation however, since this proposal intends to give flexibility and incentives for tree retention, the Commission suggests that the Green Factor reassessment occur with this change in code and not wait for additional monitoring. The Green Factor likely needs additional incentives to allow for tree retention. We suggest that it may provide more consistency to work toward developing a “Green Factor” for single family zoning.

- **Industrial Zones**

We agree with the tree planting requirements for commercial uses in industrial zones however we also suggest that some tree planting or offsite mitigation for industrial development within these zones should be required. Locations within industrial zones for mitigation should be identified as part of the city wide canopy coverage. We believe all areas of the City should have some canopy to improve overall habitat and wildlife corridors.

- **Bonding**

The city should investigate financial programs such as landscape maintenance bonds to ensure survival or required trees.

In summary, an effective tree ordinance protects all elements of the urban forest: both public and private, both inside and outside of development. An effective tree ordinance is comprehensive, bold and enforceable, yet predictable and flexible. It maintains the health of a diverse and geographically dispersed urban forest and recognizes the urban forest as an integral part of the green infrastructure system. Trees are elevated to the same status as stormwater management elements, transportation, and sewer infrastructure.

Thank you for the opportunity to comment and please contact us with any questions you may have. We look forward to continuing to work with the Mayor City Council, City Departments and our citizens to ensure protection and enhancement of our urban forest.

Sincerely,



Matt Mega, Acting Chair
Seattle Urban Forestry Commission

Open the floor to New Business

No new business

Capture Action Items and Adjourn

None

Community Input:

From: Ruth Williams [mailto:ruthalice@comcast.net]
Sent: Thursday, October 14, 2010 4:44 PM
To: PintodeBader, Sandra
Subject: Quantifying urban forest structure, function, and value: the Chicago Urban Forest Climate Project
Hello Sandra,

This is a most illuminating document. Will you please share it with the Urban Forest Commissioners?

Thank you!

Ruth Williams

(13 page document was forwarded to Commissioners on 10/14/10)



Value of urban
forests in chicago.pdf

From: John "Hooper" Havekotte [mailto:4.hooper.4@comcast.net]
Sent: Thursday, October 14, 2010 5:26 PM
To: PintodeBader, Sandra
Subject: Re: UFC - new document posted

Nice work!

John "Hooper" Havekotte
President & Webmaster
Heron Habitat Helpers

----- Original Message -----

From: [PintodeBader, Sandra](#)
To: Urban Forestry Community
Sent: Thursday, October 14, 2010 5:05 PM
Subject: UFC - new document posted

Hello Urban Forestry Community,

The draft Tree Protection Ordinance letter (version 2) which served as the basis for the 10/13 UFC meeting discussion is posted at:

http://www.seattle.gov/trees/docs/Commission_docs/101310%20TPO_draft%20letter.pdf

Thank you,

Sandra Pinto de Bader | Environmental Sustainability Coordinator | Office of Sustainability and Environment | (206) 684-3194

-----Original Message-----

From: Ruth Williams [mailto:ruthalice@comcast.net]
Sent: Friday, October 15, 2010 1:09 PM
To: PintodeBader, Sandra
Subject: Comments on the Oct. 6 UFC Meeting

Sandra - Please forward!

Greetings Commissioners:

Thank you for sharing the minutes of your October sixth meeting with us. I have several comments on the proceedings which I would like to share with you.

As to the income generated by Atlanta, GA's tree regulations: I spoke on the phone with Ainsley Caldwell who is the lead arborist for the City of Atlanta. He stated that Atlanta makes \$250-300,000 per quarter in fines and recompense. There is no formal documentation for this information yet.

I am very pleased that realtors and developers are entering the dialogue. Their views and support are going to play a major role in both the outcome and the success of our new ordinance. Although, I don't understand why they are drafting comments in support of the DPD proposal rather than helping to educate their community of clients, fellow builders, realtors, and bankers

and assisting in the construction of an ordinance that will actually help Seattle meet its stated goal of a 30% canopy by 2037. It would be lovely if they would bring their creativity to the table.

I'm not sure I understand all of Garrett Huffman's comments correctly. Is he saying the presence of a tree will limit the building size, and therefore reduce the value of the building and the corresponding loan amount? Is this what is meant here, and is it necessarily true? There should be considerable mitigation if DPD can be flexible with height limits, other setbacks, etc., and be clear and predictable in how pre-existing trees must be handled. Even if the project should turn out to be a little smaller, small projects also can pencil out.

If builders accepted that change is needed and resolved to facilitate it what kinds of resources could they bring to the table? For example, wouldn't it be cheaper and more sustainable to make an existing single family home lot into a duplex? This would increase density and preserve a lot more of the yard. Rather than starting over, the permits for a remodel should be cheaper too. Investigating nontraditional options can pay big dividends.

Randy Bannecker states, "This is the city, stop behaving like the suburbs." City or no, this is our home, and it must remain livable. Here is where most of the pollution and potential flood liability are generated, and therefore here is where substantial remediation must take place. Density must accommodate forest infrastructure and for many reasons which you have heard before. If density is the only consideration the city will become much less livable and property values will plummet. Those of us who want to remain here care a great deal about these issues. Seattle is not big enough to compete with or have the appeal of a place like New York City where the cultural scene makes up for acres of pavement. Seattle's big pitch has always been its natural setting. Lose that and you are just about out of business.

Flexibility is important, but obviously it requires the parameters of certain rules. Some buildings obtain a 'historic' designation that restricts their redevelopment. Why not some trees?

Mr. Huffman's answer to the question of what carrots the UFC can offer is a good example of why we need a strong tree ordinance. Legally required height limits and setbacks also have cost Seattle developers untold billions, but the banks still fund their reduced projects, don't they? Furthermore these restrictions enhance property values and public safety. Banks want and need to lend money, and they will respect municipal codes. Consideration for forest infrastructure must not be written off out of hand. We just need to quantify it in ways that people can understand and buy into.

His comments about the bond issue make a lot of sense. Once the property is sold the bond would have to become a lien on the property. This is an area where attorneys will be needed to perfect the language.

Brennon Staley states, "When Save the Trees asked to be informed of all the presentations to be made to the public, DPD doesn't feel comfortable telling an advocacy group so they attend all those public meetings. DPD wants to hear from the people."

To be clear, we are not precisely Save the Trees-Seattle even though we are functioning under their auspices. This new advocacy group is called Save Our Urban Forest Infrastructure. It is a coalition formed in response to the DPD proposal because we are dismayed by it. We are private citizens, and our numbers are growing.

DPD is also an advocacy group on behalf of their own proposal, and they are speaking to community groups who are relatively uninformed about the issues involved. This is the reason why there aren't many comments from unallied individuals: they don't know how to react. Having an opposing advocacy group like SOUFI at the meetings helps with education and with building an effective ordinance. I attended the Sept. 29th meeting of the Thornton Creek Watershed Oversight Council where the DPD presenter did not write down any of the several comments. Why was that?

Thank you, Commissioners, for your dedicated work on this important matter.

Sincerely,

Ruth Williams
1219 NE 107th St.
Seattle, WA 98125
206-365-8965

From: Donna Kostka [mailto:donna4510@comcast.net]
Sent: Wednesday, October 20, 2010 8:46 AM
To: PintodeBader, Sandra
Subject: RE: UFC - new document posted

Sandra, Please pass this personal comment to commission members before the meeting this afternoon. Please add more imore language about the importance of wildlife habitat, i.e. –

Exzceptional Trees, Tree Groves and Habitat Buffers

We don't think Seattle should abandon its exceptional trees, tree groves or habitat buffers. These trees still exist, although are greatly reduced since settlement. They have significant cultural, historical, and wildlife habitat value. This category needs to be better defined, rather than eliminated. These factors should be included in the credit system and protected by permits. Nesting trees for bald eagles, great blue herons, ospreys, hawks, etc. all depend on tall trees and buffering habitat. These factors need to intersect with the City's critical area ordinances, including bu9ilding in better protections to other measures such as Director's Rule 5-2007, which protects the City's two largest heronries.

Thank you, Donna Kostka (Member, Heron Habitat Helperts)

-----Original Message-----

From: Ruth Williams [mailto:ruthalice@comcast.net]
Sent: Wednesday, October 20, 2010 10:13 AM
To: PintodeBader, Sandra
Subject: UFC Letter

Hello Sandra - Please share this with the Commissioners.

Greetings Commissioners:

I'd like to thank you for all your work and diligence in assisting the citizens of Seattle to develop a healthy place for all of us to live in and enjoy. Your expertise and experience will reap huge dividends for a long time to come.

This new letter draft is really articulate and to the point. I have a few short comments as follows. One, I don't see any reference to native vegetation. Two, there's no requirement for a periodic census to monitor progress. Three, incentives are sure to be part of the final deal, and there isn't much of that here. (SOUFI is drafting a list which we will make available after our Sunday meeting. . .)

The compound subject in the sentence under #2 on page one needs a plural verb:

Ensure public education and outreach are integrated into the release and implementation of the tree protection ordinance.

This section on page two could be reworked:

3. Have DPD seriously consider the Commission's recommendations below and work with the Urban Forestry Commission to vet the issues and determine feasibility of incorporating our recommendations.

Clearer:

3. Have DPD work with the Urban Forestry Commission to vet the issues and determine the feasibility and methods of incorporating our recommendations below.

Ruth

From: Michael Oxman [mailto:michaeloxman@comcast.net]

Sent: Wednesday, October 20, 2010 10:17 AM

To: PintodeBader, Sandra; o.rhyan@gmail.com; okomski@msn.com; Bonnie Miller; Bradburd, Bill; Cheryl Trivison; David Miller; Donna Kostka; elizabeth@campbellcentral.org; escigliano@seattlemet.com; Gala, Rob; ghuffman@mbaks.com; heidicar@att.net; JeanieMurphy; Jenkins, Michael; John "Hooper" Havekotte ; nativetrees@gmail.com; shoudypk@comcast.net; larrylange36@comcast.net; lsu@u.washington.edu; Liz Kearns; thouless1@comcast.net; mpoe@ifcae.org; Murphy-Ouellette, Jeanie; nicholas@treesolutions.net; Pat Whempner; richard_ellison@hotmail.com; Ruth Williams; Steve Zemke; Wallis Bolz; SeattlePOSA@yahoogroups.com

Cc: Staley, Brennon; LaClergue, Dave

Subject: Comment to Urban Forestry Commission

Howdy,

Today at 3PM is the meeting of the Seattle Urban Forestry Commission in Room 2240 of the Seattle Municipal Tower at 5th & Columbia St. http://www.seattle.gov/trees/docs/Commission_agendas/10-20-10%20Special%20Meeting.pdf

Regarding the Parks Department's fantasy pruning cycle of 17 or 22 years: these numbers are not supported by Parks tree crew pruning records or a tree inventory database. There are lots of trees that have received no pruning, or pruning of only a few lower branches. Earlier categories used a 3 person tree crew: now the number of members of a tree crew is 2, making comparisons difficult.

So, where are the records? Where are the locations of all the trees that Parks has removed in the last year, for example?

Overlay a map of all the trees planted on the same map of trees that were removed, and present it to the Seattle Urban Forestry Commission or the Parks Board. If a record of a tree that is pruned, removed, or planted was stored properly, many questions could be answered that could lead to more efficient management.

Do we know where all the Red Maples are? I suspect that this drought-tolerant, easy-to-establish species is too prevalent, making it a monoculture in our town. Red Maples absolutely MUST be pruned within the first 5 years, otherwise they develop weak forks where multiple limbs originate from the same place. A tree with such defects can usually not live past the age of 25. Lets see a map where 5 year old maples have been pruned. More importantly, lets see the map of 5 year old maples that haven't been pruned. We will never get the budget until we do this.

Information management can extend the lifespan of individual trees in our urban forest to a minimum of 50 years. To be a good investment, all of our planting sites should have enough soil and air space around them to allow a tree to be happy in that spot for a half century. The top priority in the city tree program should be an effective database. We now have tree catalogs in 4 formats: Hansen GIS (SDOT); LIDAR; Infrared; and iTree. Can citizens assess their government's management ability & compare proposed changes in tree policy? Can we assume reasonable tax burden to pay for multiple incompatible 'designer' technologies, just because they are 'on sale'?

Most of our tree inventory issues can be addressed by proper recordkeeping. Format becomes a non-issue when the tree crew work order (including friends-of groups) is completely filled out after each job. Can we see a tree work order? Let's get an accounting.

City staff: Please present a report on the state of the urban forest. What do we have; what are we doing with it; and what is the expected maintenance schedule over a projected timeline. That will tell us our costs. Then we may be able to decide if the program is worth investing in. But, don't be dismayed if the necessary funding isn't forthcoming when the need hasn't been documented. This goes for street tree maintenance also.

You can believe the administrator-heavy police have crunched the numbers on costs of the proposed lapel pin camera system. We still have to hand in our urban forestry homework.

Arboreally yours,

Michael Oxman
(206) 949-8733
www.treedr.com

From: Steve Zemke [mailto:stevezemke@msn.com]
Sent: Wednesday, October 20, 2010 2:02 PM
To: PintodeBader, Sandra
Subject: comments to UFC re draft letter to City Council

Comments to Seattle Urban Forestry Commission

Re: Oct 20, 2010 Draft Letter to Seattle City Council

From Steve Zemke, Chair, Save the Trees-Seattle 10/20/2010

The Urban Forestry Commission has greatly improved and detailed their concerns in their most recent draft letter in response to DPD's proposed Tree regulations Document.

There are several areas where we would like to see greater emphasis or which are neglected.

In particular we would like to see more emphasis placed on the ecosystem and habitat value of our urban forest. While you mention on page 3 the elevation of trees as infrastructure you do it largely in terms of economic impacts. While this is important, the ecosystem function of a healthy urban forest also needs to be considered which may not always be assigned a monetary value or benefit until it is lost. For example there is no mention of maintaining biodiversity in the document. We can increase our canopy with a monoculture of maple trees or cherry trees but this is not an ecosystem that protects native birds and insects and other animals that live here.

A healthy urban forest needs to be look at minimizing the introduction and increase in non-native species and give preference to native trees, plants and animals. Wildlife survivability needs to be considered in terms of protecting habitat and connections between habitats. Fragmentation and decrease of habitat size reduces species diversity. Invasive exotics need to be prohibited.

There needs to be an evaluation of the consideration of protecting and increasing canopy as volume not just area and what changes are taking place in our urban forest in a 3 dimensional aspect not just 2 dimensional. Consideration needs to be given to tree loss as loss in canopy volume and its impact on ecosystem function and infrastructure impacts. Tree removal need to be considered in terms of a long term or permanent decrease in canopy volume. Replacement needs to be done in terms of volume. Replacement also needs to be considered in terms of reduction or increase in native habitat values. We could wind up increasing canopy area only to see a diminishment in terms of ecosystem value and habitat viability for native species of plants and animals.

Along with a more thorough evaluation of potential permit systems to enhance tree protection and canopy increase, there also needs to be a more thorough vetting of possible incentives to encourage protection of trees.

Add under permit system p 5 benefits that in addition to removal of street trees illegally it would it would help to reduce boundary line disputes as to who owns a tree and cases where the tree is actually physically on two or more properties because it is physically on the property line.

Under public education p 5 the second sentence could be more declarative. "Posting to inform neighbors of removal would strengthen neighborhood involvement and education in protecting trees."

Your urging that DPD more actively engage the Urban Forestry Commission in developing the proposal makes sense. I again urge that the Urban Forestry Commission hold one or more joint public meetings with DPD and the other urban forestry representatives within the 9 city Departments dealing with tree issues. It doesn't make sense for these Departments to not be involved in the process in an open public process so that everyone's concerns can be considered.

The issue of consolidating the disparate urban forestry oversight into one department should be on the list of issues to publicly be given more consideration.

No mention is made of also requiring all city departments to comply with permit requirements to remove trees. The concept of everyone, public and private, operating by the same rules will go a long way to getting acceptance by the citizens of the need for a permit system. And the city complying means that they would also be involved in helping to document the loss or gain of forest canopy as a result of their actions.