

Seattle Urban Forestry Commission

Tom Early, Chair • Steve Zemke, Vice-Chair
Weston Brinkley • Leif Fixen • Megan Herzog • Craig Johnson
Joanna Nelson de Flores • Sarah Rehder • Andrew Zellers

September 13, 2017.

Councilmember Rob Johnson
City Hall
600 4th Ave.
Seattle, WA 98124

RE: Design Review Program Improvements – CB119057

Dear Councilmember Johnson,

The Urban Forestry Commission commends the intent of the Design Review Program Improvements. A city should continually re-examine its procedures in order to efficiently meet its goals. Based on the Commission's review, the proposed changes conflict with the goals of the City's Urban Forest Stewardship Plan (UFSP), specifically to reach 30% canopy cover by 2037. In light of this, the Commission makes two recommendations to the proposed Design Review Program Improvements, which should also be applied to the current permit review procedures such as clearing and grading.

The first recommendation is to track tree and canopy removal per project. Specifically, the Commission recommends tracking significant tree removals, exceptional tree removals, and removed canopy coverage, in square feet, as part of a complete application. Without this data, the City cannot accurately quantify tree and canopy removal and implement appropriate tree planting efforts. See the Commission's previous letter of recommendation dated June 25, 2014 (enclosed).

The second recommendation is to provide a fee-in-lieu option for projects unable to replace trees equal to the number of trees and amount of canopy removed by a project. There is a lost public benefit associated with the removal of public and private trees which impacts human psychology, ecosystem services, public health, and neighborhood character. A tree removal fee-in-lieu option should be similar to the alternative compliance option for stormwater mitigation yet deposited in an Urban Forestry Account to fund planting and maintaining for long-term, healthy trees in Seattle.

These recommendations are intended to aid the UFSP's monitoring goals and provide an off-site approach to mitigate tree canopy cover loss due to development. Thank you for the opportunity to provide comments on the proposed Design Review Program Improvements described in CB119057.

Sincerely,



Tom Early, Chair

cc: Mayor Bruce A. Harrell, Councilmember Bagshaw, Councilmember Burgess, Councilmember Gonzalez, Councilmember Herbold, Councilmember Juarez, Councilmember O'Brien, Councilmember Sawant, Jessica Finn Coven, Nathan Torgelson, Michelle Caulfield, Lisa Rutzick, Maggie Glowacki, Anthony Auriemma, Aaron Blumenthal, Peter Lindsay

Sandra Pinto de Bader, Urban Forestry Commission Coordinator
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Seattle Urban Forestry Commission

Peg Staeheli, Chair • Tom Early, Vice-Chair

Gordon Bradley • Leif Fixen • Donna Kostka • Jeff Reibman • Erik Rundell • Steve Zemke

June 25, 2014.

Mayor Ed Murray and Councilmember Sally Bagshaw

Seattle City Hall

600 4th Avenue

Seattle, WA 98124

Dear Mayor Murray and Councilmember Bagshaw,

As our city increases efforts to improve canopy coverage we have a gap in that even as we plant new trees, the number of trees removed from private land under development in the city is unknown. The Urban Forestry Commission would like to have better information on the number of trees removed from private land to obtain a metric which could be correlated to canopy cover assessments. This correlation would help articulate the need for a future tree code on private property. We would also be able to fulfill the monitoring called for in Seattle's Urban Forestry Stewardship Plan and provide the City with data to judge how difficult a tree code on private property could be.

There are two specific requests we would like to make to comply with the monitoring efforts of the newly adopted Urban Forestry Stewardship Plan (UFSP).

1. Updated canopy assessment: Regular canopy coverage assessments are integral to the monitoring of the UFSP. The last canopy cover assessment was performed in 2009 with 2007 data. Please allocate funding for an updated canopy coverage assessment to the Office of Sustainability and the Environment per the short term action item (1-5 years) within the UFSP.
2. Quantify Tree Removals: Accurate tree planting and removal quantities are necessary for monitoring of the UFSP within the largest management unit in the city: single family residential areas. The table 8 (attached) is excerpted from page 73 of the UFSP. The last two columns show that we have a goal of raising the canopy cover substantially throughout the city. There currently is no data available to understand the impacts development has on canopy cover. In order to track our progress to reach our 2037 goal, we ask that DPD to:
 - a. Upgrade building permit applications within the single family zones to quantify tree removals; and
 - b. Report tree removals within the single family zones annually. Geographically located tally data would also be helpful for correlating development with tree canopy losses and gains.

Enclosed is a more detailed document explaining additional information that would be useful for the City to better manage the urban forest to accomplish the City's goals.

Sincerely,



Peg Staeheli, Chair
Urban Forestry Commission



Tom Early
Urban forestry Commissioner

Table 8. Canopy cover goals by management unit

Management unit	MU as % of total city land area	Estimated 2007 canopy cover	2037 canopy cover goal
Single-Family	56%	26%	33%
Multi-Family	11%	17%	20%
Commercial/Mixed Use	8%	16%	15%
Downtown	1%	9% ¹	12%
Industrial	11%	4%	16% ²
Institutional	2%	19%	20%
Developed Parks	4%	25%	25%
Parks/ Natural Areas	7%	80%	80%
City-Wide		23%	30%
Right-of-Way ³	27%	18%	24%

¹ The assessment of 2007 satellite data measured downtown canopy at 5%. The process encountered difficulties measuring downtown due to tall buildings casting shadows over trees. SDOT did an analysis of their inventory and estimated that current downtown canopy cover is closer to 9 percent.

² The assessment of 2007 satellite data suggested higher canopy cover levels than had previously been expected for all management units except for the industrial, which decreased from 8 percent to 4 percent. However, canopy cover goals for management units were not changed as part of the UFSF update. Consequently, the difference between the current canopy and the goal was increased but this shift is not intended to represent a change in the City's overall strategy and the canopy cover goal will be revisited as part of the next UFSF update.

³ Right-of-way trees area is included in each of the land-use types.

cc: Council President Burgess, Councilmember Clark, Councilmember Godden, Councilmember Harrell, Councilmember Licata, Councilmember Rasmussen, Councilmember O'Brien, Councilmember Sawant, Jill Simmons, Diane Sugimura, Brennon Staley, Eric McConaghy

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Urban Forest Canopy Impact Assessment

The Seattle Urban Forestry Commission is tasked with advising the Mayor and Seattle City Council on urban forestry issues. This includes implementing the Urban Forestry Stewardship Plan (UFSP) to achieve a 30% canopy goal by 2037. In addition, the current Seattle Comprehensive Plan states that the City needs to maintain no net loss of canopy as a baseline. As noted in our letter, the Commission considers two steps very important:

1. Perform a tree canopy assessment
2. Improve current submittal documentation for projects under development

The Commission has discussed several ideas to improve submittal documentation and final reporting for projects under DPD's permitting.

- Currently, the City, through OSE and the Urban Forestry Interdepartmental Team, keeps track of the number of trees planted and removed on public property every year. The Commission recommends tracking trees lost on private property undergoing development to assist in determining where we are gaining or losing trees and canopy. This would add information to the overall city canopy coverage assessment data. By knowing more about canopy trends on different types of land, we can better direct policy and programming to ensure we are on track to meet our 30% goal.
- What would help the City better understand what is happening with tree canopy protection and enhancement is to require that all development projects submit an Urban Forest Canopy Impact Assessment prior to any construction project being approved. The Urban Forest Canopy Impact Assessment would include a map of the property with the trees numbered, canopy area of trees drawn, and trees to be removed clearly labeled. Under current guidelines it would minimally require that all trees 6 inches DBH (diameter at breast height) or larger be inventoried on the property. The suggested data points required would be :
 - Species: speaks to size of canopy and amount of storm water benefit.
 - DBH: speaks to age of tree and canopy coverage.
 - Tree Height: speaks to canopy volume and amount of environmental benefit.
 - Canopy Width (area): speaks to canopy volume and amount of environmental benefit.
 - Tree Condition: speaks to overall forest health and environmental impacts.
 - Photographs of the trees on the parcel and adjacent properties.
 - Canopy coverage as a percent of area pre- and post-project development.
- Landscape Plan Requirements could include calculations for percent canopy coverage at 20 years and soils volume provided for each tree.
- The annual UFSP Progress Report to the Mayor and City Council could include canopy coverage for different development zones.

Implementing some or all of these operational steps would greatly help to evaluate whether or not we are doing enough to reach our 30% canopy goal by 2037. It would also allow some progress on clarifying tree requirements until DPD is able to put forward a new tree ordinance.