



SEATTLE URBAN FORESTRY COMMISSION

Weston Brinkley (Position #3 – University), Chair • **Sarah Rehder** (Position #4 – Hydrologist), Vice-chair
Julia Michalak (Position #1 – Wildlife Biologist) • **Elby Jones** (Position #2 – Urban Ecologist - ISA)
Stuart Niven (Position #5 – Arborist – ISA) • **Michael Walton** (Position #6 – Landscape Architect – ISA)
Joshua Morris (Position #7 – NGO) • **Blake Voorhees** (Position # 9 – Realtor)
Elena Arakaki (Position #10 – Get Engaged)
Jessica Jones (Position # 12 – Public Health) • **Shari Selch** (Position # 13 – Community/Neighborhood)

The Urban Forestry Commission was established to advise the Mayor and City Council concerning the establishment of policy and regulations governing the protection, management, and conservation of trees and vegetation in the City of Seattle

Meeting notes

April 7, 2021, 3:00 p.m. – 5:00 p.m.
Via Webex call
(206) 207-1700
Meeting number: 146-760-4763
Meeting password: 1234

In-person meeting are not being held at this time due to the pandemic. Meeting participation is limited to access by joining the meeting through a computer or telephone conference line.

Attending

Commissioners

Weston Brinkley – Chair
Elena Arakaki
Elby Jones
Jessica Jones
Julia Michalak
David Moehring
Josh Morris
Stuart Niven
Shari Selch
Blake Voorhees
Michael Walton

Staff

Sandra Pinto Urrutia - OSE

Public

Jim Davis
Michael Oxman
Steve Zemke

Absent- Excused

Sarah Rehder - Vice-Chair

NOTE: Meeting notes are not exhaustive. For more details, listen to the digital recording of the meeting at: <http://www.seattle.gov/urbanforestrycommission/meetingdocs.htm>

Call to order: Weston called the meeting to order.

Public comment:

Jim Davis: He sent an email to Sandra with comments for distribution to the group.

Michael Oxman: He would like to thank the UFC for deliberations and papers from the last 12 years when Councilmembers Conlin and Licatta were supporting work on tree regulations update. He thinks the UFC has been stonewalled.

Steve Zemke: He saw the SDCI data sheet that was posted on the UFC website. The sheets needs refinement. He is concerned about tracking of tree loss and replacement. He would like to get details about the canopy that remains. Current code requires to show and list trees 6" in diameter and greater. This information can easily be incorporated into the form. Also, street addresses are not included on the sheet. People have to go look at the permit. Regarding licensing arborists, Denver and other cities require licensing of tree companies doing work on the city's trees.

Chair report:

Weston welcomed Sharon Lerman, OSE's interim Deputy Director, who will be listening in on the meeting as part of OSE's support for Sandra's position transition.

Weston mentioned that SDCI and OSE delivered the tree regulations quarterly report to Council's Land Use and Neighborhoods committee.

Sandra provided the following updates:

- She confirmed that commissioners Sarah Rehder, Stuart Niven, Michael Walton, Jessica Jones, and Shari Selch, all seeking reappointment to a second three-year term were re-appointed by City Council.
- Recruitment for Position #11 (Environmental Equity – Council appointment) closes on 4/29.
- She shared that the City is acquiring leaf-off Lidar data in 2021 which will allow for a 2021 canopy cover assessment. This will allow for a canopy cover change over time (trend) analysis. She will post a link to the GIS canopy cover [layers](#) in the Resources section of the UFC website.

Adoption of March 3 and March 10 meeting notes

ACTION: A motion to approve the March 3 meeting notes as amended was made, seconded, and approved.

ACTION: A motion to approve the March 10 meeting notes as written was made, seconded, and approved.

UFC Committee scope discussion and membership

The group discussed the potential scope of an Administrative committee and an Equity and Diversity committee. Commissioners signed up to participate as follows:

Administrative committee: Josh, Sarah, Shari, and Weston

Equity and Diversity committee: Shari, Elena, Julia, and Weston.

Discussion about specific language around false and misleading claims by tree service providers as part of the DR or ordinance update efforts.

The group discussed the need for another letter of recommendation about SDCI's Director's Rule for discussion and possible vote at next week's meeting.

NOTE: Meeting notes are not exhaustive. For more details, listen to the digital recording of the meeting at: <http://www.seattle.gov/urbanforestrycommission/meetingdocs.htm>

Public comment:

Steve Zemke: Regarding the recommendations on doing tree inventories on private property, he believes they need to be simplified. Seattle needs a tree inventory on every property. This is already being done in platting and sub-platting processes. All trees should be captured specifying those that are going to be protected, and those that are being removed. Photos should be provided.

There is a Bill in Olympia about providing funding to the Department of Natural Resources to support municipalities. Make sure to support the bill.

Michael Oxman: He is asking the UFC to allow the public to be part of the committees being established. He would also like to say that fencing should be required around trees during development. Also, the City should require passing the certified arborist exam for those doing work on trees. The certification has a code of ethics and complies with AINSI A300 standards.

Adjourn: Weston adjourned the meeting.

Meeting chat:

from Steve Zemke (privately): 3:31 PM

Was large trees those at 140 high or was it a different height?

from Steve Zemke (privately): 3:32 PM

Big leaf maple reach about 100 feet high and are exceptional at 30" DBH.

from David Moehring (privately): 3:38 PM

Line 72 of March 3, 2021, 3:00 p.m. – 5:00 p.m. draft notes: Properties included in the presentation were:- 4101 Wallingford Ave N- 2000 NW 61st St and 6105 20th Ave NW- 2030 and 2042 NW 62nd St- 2813 4th Ave W- 2213 NW 63rd Stand..... line 77 "David also shared numbers of STREET trees removed and trees planted by SDOT from 2007 to 2019 (600 to 900 per year removed obtained from October 2019 Public Records Request)".

from Michael Oxman (privately): 3:59 PM

Comment on line 109 of the Minutes: Trees dont break according to their age. They usually break when defects in the wood reduce strength. These defects can be spotted during regular inspection, and tree architecture improvement makes for a stronger branch structure that is less prone to failure.

from Michael Oxman (privately): 4:03 PM

Please allow committees to include members of the public.

from Stuart Niven (privately): 4:10 PM

I wuold be happy to join admin committee, depending on timing of meetings.

from Michael Oxman (privately): 4:26 PM

Arborist Report should includes amount of canopy cover area prior to development, and afterwards.

from Michael Oxman (privately): 4:41 PM

Require certification by ISA

from Michael Oxman (privately): 4:43 PM

Require pruning to ANSI A300 standards.

from Michael Oxman (privately): 4:45 PM

ECA requires arborist report fror landscape plan on steep slopes or creeks

from Sandra Pinto Urrutia to everyone: 4:56 PM

<http://web6.seattle.gov/DPD/DirRulesViewer/Rule.aspx?id=17-2018>

Public input: (see next page and posted notes)

From: dmoehring@consultant.com <dmoehring@consultant.com>

Sent: Sunday, March 14, 2021 11:18 AM

To: PRC <PRC@seattle.gov>

Cc: Treepac <Treepac@groups.outlook.com>; Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>; FIREPDR <FIREPDR@seattle.gov>

Subject: Arborist assessment of remaining trees with stumps and groves

CAUTION: External Email

Seattle PRC,

Northeastern Seattle's clear-cutting of properties continues unchecked. Seattle needs strengthened enforcement of tree protection requirements within SMC 23.24, SMC 25.11, and other Seattle Municipal Codes.

Please note the collage of images from this Cedar Park area property at 3532 NE 134TH ST from the SDCI EDMS. Given the images of large trees and tree stumps, provide and carefully review an arborist assessment of tree groves and exceptional trees. The evidence of trees removed may also be found from the 2017 site plan. How are trees being removed on a previous permit application? There does not appear to be permits issued to remove the trees.

[Site Plan](#) 178 KB 02/07/17 [3027149-LU](#) Master Use Permit

The existing 11,618 sq. ft property (within a SF-7200 zone) is being proposed to be subdivided into two long narrow lots wth SDCI project #3037750-LU so that related permits may include new buildings that will result in additional tree removal.

The Seattle Fire Department needs to review the required emergency access to the lot and splitting it into two lots. The dead-end street is about 275 feet in length, exceeding the maximum 150-foot length without a fire truck turnaround.

Moreover, the resulting lot sizes with one being just 5,479 sq. ft. is too small at 76% of the minimum 7,200 sq ft lot size. Please verify surveys, especially including the provisions for emergency vehicle turnaround at the end of a dead-end street. The survey is missing adjacent property bordering trees and structures.

Thank you for allowing these comments to PRC@seattle.gov.

From: Stuart Niven <panorarbor@gmail.com>
Sent: Monday, March 15, 2021 3:38 PM
To: David Moehring <dmoehring@consultant.com>
Cc: PRC <PRC@seattle.gov>; Treepac <Treepac@groups.outlook.com>; Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>; FIREPDR <FIREPDR@seattle.gov>
Subject: Re: Arborist assessment of remaining trees with stumps and groves

CAUTION: External Email

Thank you David, I second your comments.

Thank you and kind regards,

Stuart Niven, BA (Hons)

PanorArborist

www.panorarbor.com

[ISA Certified Arborist PN-7245A & Tree Risk Assessment Qualification \(TRAQ\)](#)

[Arborist on Seattle Audubon Society Conservation Committee](#)

[Arborist on Seattle's Urban Forestry Commission](#)

[Board Member of TreePAC](#)

[WA Lic# PANORL*852P1](#) (Click to link to WA L&I's Verify a Contractor Page)

From: Judith Starbuck <judithstarbuck@msn.com>
Sent: Monday, March 15, 2021 3:43 PM
To: Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>
Subject: Please Strengthen Seattle's Tree Ordinance

CAUTION: External Email

Sandra Pinto de Bader,

It's time to end the delay by the Seattle Department of Construction and Inspections (SDCI) on presenting the Seattle City Council with an updated draft Tree and Urban Forest Protection Ordinance. Over the last 12 years, the City Council has repeatedly asked SDCI for an updated workable and effective ordinance draft to consider and it is obvious SDCI is not responding as requested. In its recent Resolution 31902, the Council gave specific issues for SDCI to address.

If SDCI cannot respond in a timely manner, please remove tree and urban forestry protection from their Department. As the City Auditor proposed in 2009, transfer tree and urban forestry oversight and authority to the Office of Sustainability and the Environment. SDCI has a

conflict of interest in tree oversight – their priority mission has been to help developers build, not protect trees. Years of inaction on effective oversight and protection of trees by SDCI demands that a separate entity like OSE take over the city’s responsibility to protect and enhance our urban forest.

Seattle’s trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle’s rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6” and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant Trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants and set up easements.
3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24” DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT’s existing tree service provider’s registration and certification to register all

Tree Service Providers (arborists) working on trees in Seattle.

8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Judith Starbuck

judithstarbuck@msn.com

1126 GRAND AVE

SEATTLE, Washington 98122

From: dmoehring@consultant.com <dmoehring@consultant.com>

Sent: Thursday, March 18, 2021 11:58 AM

To: PRC <PRC@seattle.gov>

Cc: Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>; sdot_la@seattle.gov

Subject: Duwamish Tree grove clearing for 3 new houses and opening of street

CAUTION: External Email

Thank you for allowing public comment.

The limited tree canopy within the Duwamish valley at 1211 to 1219 S TRENTON ST is proposed to be thinned even further, resulting in greater disparity and loss of equitable environment compared to other parts of Seattle:

Project: 3033333-LU

Area: West Seattle

Notice Date: 3/18/2021

Project Description

Land use application to allow a 2-story single family dwelling unit. Parking for 2 vehicles proposed.

Comments may be submitted through: 03/31/2021

And

Application for project 3037675-LU

(Click for complete notice information)

Address: 1211 S TRENTON ST Project: 3037675-LU

Area: West Seattle

Notice Date: 3/18/2021

Project Description

Land use application to allow a 2-story single family dwelling unit. Parking for 2 vehicles proposed.

Comments may be submitted through: 03/31/2021

And

Application for project 3037676-LU

(Click for complete notice information)

Address: 1215 S TRENTON ST Project: 3037676-LU

Area: West Seattle

Notice Date: 3/18/2021

Project Description

Land use application to allow a 2-story single family dwelling unit. Parking for 2 vehicles proposed.

Comments may be submitted through: 03/31/2021

How will this project account for tree canopy replacement per provisions of the code?

David Moehring

Board member

TreePAC



Sent using the mobile mail app

From: Stuart Niven <panorarbor@gmail.com>

Sent: Friday, March 19, 2021 6:41 AM

To: David Moehring <dmoehring@consultant.com>

Cc: PRC <PRC@seattle.gov>; Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>; sdot_la@seattle.gov

Subject: Re: Duwamish Tree grove clearing for 3 new houses and opening of street

CAUTION: External Email

Thank you David, I second your question about this project.

Thank you and kind regards,

Stuart Niven, BA (Hons)

PanorArborist

www.panorarbor.com

[ISA Certified Arborist PN-7245A & Tree Risk Assessment Qualification \(TRAQ\)](#)

[Arborist on Seattle Audubon Society Conservation Committee](#)

[Arborist on Seattle's Urban Forestry Commission](#)

[Board Member of TreePAC](#)

[WA Lic# PANORL*852P1](#) (Click to link to WA L&I's Verify a Contractor Page)

From: Margaret Staeheli <mpegrose@gmail.com>

Sent: Tuesday, March 23, 2021 9:32 PM

To: Strauss, Dan <Dan.Strauss@seattle.gov>

Cc: noah.an@seattl.gov; Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>

Subject: Tree Code

CAUTION: External Email

City Council members:

I want to once again express my deep disappointment and frustration at the circular process city council continues to follow regarding trees in Seattle.

I volunteered my time on the Urban Forestry Commission - at a time when both my family and my business required considerable attention. Thus the Commission volunteer was my "free time" more than 12 years have passed -. I am volunteering outside of city process now because very little happened.

Then- remember 2020- a newly elected with CM Strauss had a hearing- over a year and half ago- I attended and spoke- at that time you and other CM's said you would finally direct city staff to get the code updated. COVID 19 is no excuse. The work and framework had been done. You just needed to direct city staff. You said you would move forward but you went sideways or what I feel is backwards.

Now I hear you are hiring a consultant to review Seattle resident attitudes toward trees - really - why suddenly go backwards. Please explain- if it is pressure from the development community then just say it- I can accept that fact- I can no longer accept the council spin. The reality is creative, dynamic cities have housing and trees. Figure out how to use the space in our land. Be honest and transparent with your reasoning.

Please take two half days and "drive" around the whole city- look at the trees on new housing - where they are placed- what species. Understand street trees are fine, park trees are fine but the SDOT trees will not create canopy in our neighborhoods

I encourage you to move on adopt the UFC code recommendations.

Peg Staeheli
West Seattle
Sent from my iPhone

From: heidi calyxsite.com <heidi@calyxsite.com>

Sent: Wednesday, March 24, 2021 8:21 AM

To: Strauss, Dan <Dan.Strauss@seattle.gov>

Cc: NoahAn@Seattle.gov; Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>

Subject: Comments in support of adopting a tree ordinance-

Importance: High

CAUTION: External Email

March 24, 2021

Dear Councilman Strauss and Land Use and Neighborhoods Committee:

The Council--- driven by existing conditions across Seattle, our current rate of cutting 3,000-4,000 trees a year, profligate use of fraudulent hazard tree determinations, fire smoke, high heat island index, and the diminishing of, and continued assault on, communities of color—all speak to your incumbent responsibility to adopt a tree ordinance.

Two years ago, we passed Resolution 31902. While there has been some good progress, we seem to be stuck resolutely in a continuous loop of studying an issue to death. While you are conducting your community outreach between March and June, please use existing community groups which are already involved in green infrastructure, tree protection and gentrification issues as well as climate. Climate alone should drive your decision to adopt a tree ordinance.

<https://www.seattletimes.com/seattle-news/environment/amid-climate-crisis-a-proposal-to-save-washington-state-forests-for-carbon-storage-not-logging/>

We had not had an updated ordinance in over 12 years which is clearly unacceptable.

A City audit and two Tree Regulations Reports later, the City still seems unable to adopt an ordinance. Perhaps it's because the developer community sits at the Council and Mayor's doors on an ongoing basis? It's strains credulity to come up with any other set of excuses since you have a stellar UFC and expertise at your disposal as well as every conceivable basis for taking action.

You must do what SDCI- the center of an obvious conflict of interest (construction department the head of tree regulations? Dur),--cannot and will not do. Please do what you know is right.

And please don't say you support communities of color, underserved communities while letting these patterns of destruction run unabated. Do something and do the right thing. This is an easy fix if you use your common sense, research and your own moral compass to do what needs to be done. Pass the ordinance.

Please share this note with the rest of your Committee and please put in the public records for the UFC. Thank you for taking action today to adopt the ordinance.

All the best,
Heidi Siegelbaum.

Heidi Siegelbaum

Heidi@calyxsite.com

(206) 784-4265

<https://www.linkedin.com/in/HeidiSiegelbaum>

From: Ruth Alice Williams <ruthalice@comcast.net>

Sent: Wednesday, March 24, 2021 1:18 PM

To: Strauss, Dan <Dan.Strauss@seattle.gov>; Juarez, Debora <Debora.Juarez@seattle.gov>; Mosqueda, Teresa <Teresa.Mosqueda@seattle.gov>; Pedersen, Alex <Alex.Pedersen@seattle.gov>; Gonzalez, Lorena <Lorena.Gonzalez@seattle.gov>; Lewis, Andrew <Andrew.Lewis@seattle.gov>

Cc: An, Noah <Noah.An@seattle.gov>; Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>; Emery, Chanda <Chanda.Emery@Seattle.gov>

Subject: Tree Protection Planning and Parking Requirements North of 85th Street

CAUTION: External Email

Dear City Council Land Use and Neighborhoods committee members:

Tree Protection:

I am very pleased to see that there has been progress in enforcing the regulations we have in place and in improving documentation of the existing tree canopy. And now we are presented with a detailed plan and schedule for crafting the tree protection ordinance we've awaited so long. Please don't allow this to go through the public process and then evaporate as all the earlier ones have done. Seattle needs our trees protected now, not by-and-by when they are already gone.

To cite just one example of the damage being done now, not far from my home there are plans for an eight-story, 345,300 sq. ft., multi-family project at 10631 8th Avenue NE (3035925-LU). The applicants propose to remove 29 mature trees, including, seven giant sequoias, and completely mitigate the loss by planting seven vine maples.

We need to keep the 'Emerald City' green and healthy by valuing our trees enough to protect them and to work for no net loss of canopy and ecoservices.

Cars:

The Transit Oriented Development Overlay for Northgate allows the construction of multi-family projects with minimal or no parking. This is going on in neighborhoods where there are few sidewalks. (The City never saw fit to fund them north of 85th Street.)

This policy is causing growing congestion in the public rights-of-way and creating hazards for pedestrians. 'Getting people out of their cars' is not the same thing as discouraging car ownership, and SEPA reviews are often too lax to catch these problems.

We all anticipate the convenience of the coming Sound Transit train stations and the improvements in our bus services, but over night they aren't going to cause most or even many of Seattle's 81% who own cars to stop owning and housing them. Besides, we would do well to note that in New York City only 45% own cars, but even so, the streets are jammed, and parking costs are steep.

At the same time, we need to remember that the gig economy largely runs on the backs of poor people with cars.

The problems are complex, and with the increased density we hope for, we need to become drastically more creative and proactive in coping with private transportation. But in the meantime, please beef up those SEPA reviews.

Thank you for your attention to these matters.

Sincerely,
Ruth Williams
1219 NE 107th St.
Seattle, 98125

From: heidi calyxsite.com <heidi@calyxsite.com>

Sent: Sunday, March 28, 2021 11:51 AM

To: Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>; David Moehring <dmoehring@consultant.com>; Stuart Niven <panorarbor@gmail.com>

Subject: Concerns about company's advice on which trees to keep during construction

CAUTION: External Email

<https://www.washingtontreeexperts.net/protect-trees-construction/>

For your next UFC meeting (if you have room), please discuss how the City of Seattle addresses false or misleading information regarding tree care and removal. While the ISA material below may be accurate, to put this on a consumer oriented web site is misleading. "Trees that can blow over easily?" Really- this seems pretty complex.

The [ISA outlines the following criteria](#) for groups of trees considered within an Excellent Stand Protection Zone, or a zone of trees that is healthy and should be protected:

- Healthy soil
- Prevalent wildlife
- Ecological function
- Natural forest succession and regeneration

Criteria for groups of trees that may be considered in Poor Stand Protection Zone, or a zone of trees that is unhealthy and may be a hazard to the community include:

- **Trees that can blow over easily**
- Sparse forest areas
- Poor soil and erosion
- Prevalent weeds and invasive species

Heidi Siegelbaum
Heidi@calyxsite.com

(206) 784-4265

<https://www.linkedin.com/in/HeidiSiegelbaum>

From: Chris Covert-Bowlds <info@email.actionnetwork.org>
Sent: Sunday, March 28, 2021 2:29 PM
To: Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with the amendments recommended by the Seattle Urban Forestry Commission, SDCI's Director's Rule 13-2020 (Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements).

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 12 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require.

Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Chris Covert-Bowlds
c.covertbowlds@gmail.com
523 N 84th St
Seattle, Washington 98103

From: Patricia Murphy <murphy.patricia@live.com>
Sent: Sunday, March 28, 2021 10:33 PM
To: Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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short platting process

- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
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- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are

removed during development.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Patricia Murphy

murphy.patricia@live.com

8835 Burke Ave N

Seattle, Washington 98103

From: Sophie Newland <info@email.actionnetwork.org>
Sent: Monday, April 5, 2021 10:15 AM
To: Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>
Subject: Please Strengthen Seattle's Tree Ordinance

CAUTION: External Email

Sandra Pinto de Bader,

I have a personal story about why the Seattle Tree Ordinance is essential to equitable retention of Seattle's mature trees - and why it is not yet fully sufficient to help tree owners

without excess resources to defend mature trees against threats from wealthier Seattle neighbors demanding more sunshine and less needles in their backyards.

We are being legally threatened by our two wealthier neighbors if we do not remove two of the three mature Western Cedar Trees from our yard because they don't like the needle debris in the Fall, although sunshine issues are also mentioned. These neighbors and their lawyer have no problem bending the truth and manufacturing issues to support their threatening letters and predicting great legal costs to us if they don't get their way. Today they rejected our proposal provided by a ISA certified arborist to remove only one of the three cedar trees (two trunked, diameter at 4.5 feet = 15" and 21") and prune for maintenance the remaining two trees (diameters at 4.5 feet = 45" and 21"). I am not sure what we will do; but thankfully we are unable to consider their repeated threatening requests that we top the upper 50 feet of the 75 foot tall Exceptional Tree (45" diameter) protected by the existing Seattle Tree Ordinance.

Ideally Seattle would lower the diameter threshold to protect smaller, but still significant trees, for example the cedar tree in our yard with a 21" diameter at 4.5 feet, but in any case this is a real-world example about why the Seattle Tree Protection Ordinance is essential to equity - it helps less wealthy property owners defend mature trees against neighbors with abundant resources and unscrupulous lawyers.

It's time to end the delay by the Seattle Department of Construction and Inspections (SDCI) on presenting the Seattle City Council with an updated draft Tree and Urban Forest Protection Ordinance. Over the last 12 years, the City Council has repeatedly asked SDCI for an updated workable and effective ordinance draft to consider and it is obvious SDCI is not responding as requested. In its recent Resolution 31902, the Council gave specific issues for SDCI to address.

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of

trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Sophie Newland

sophvannew@yahoo.com

3632 41st Ave W

Seattle, Washington 98199

From: Sophie Newland <info@email.actionnetwork.org>

Sent: Monday, April 5, 2021 10:20 AM

To: Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

I have a personal story about why the Seattle Tree Ordinance is essential to equitable retention of Seattle's mature trees - and why it is not yet fully sufficient to help tree owners without excess resources to defend mature trees against threats from wealthier Seattle neighbors demanding more sunshine and less needles in their backyards.

We are being legally threatened by our two wealthier neighbors if we do not remove two of the three mature Western Cedar Trees from our yard because they don't like the needle debris in the Fall, although sunshine issues are also mentioned. These neighbors and their lawyer have no problem bending the truth and manufacturing issues to support their threatening letters and predicting great legal costs to us if they don't get their way. Today they rejected our proposal provided by a ISA certified arborist to remove only one of the three cedar trees (two trunked, diameter at 4.5 feet = 15" and 21") and prune for maintenance the remaining two trees (diameters at 4.5 feet = 45" and 22"). I am not sure what we will do; but thankfully we are unable to consider their repeated threatening requests that we top the

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Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Please adopt, with the amendments recommended by the Seattle Urban Forestry Commission, SDCI's Director's Rule 13-2020 (Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements).

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 12 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process,

and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”

- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a

certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Sophie Newland

sophvannew@yahoo.com

3632 41st Ave W

Seattle, Washington 98199

From: Siegelbaum, Heidi <heidi.siegelbaum@wsu.edu>

Sent: Monday, April 5, 2021 10:31 AM

To: Strauss, Dan <Dan.Strauss@seattle.gov>; Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>; Emery, Chanda <Chanda.Emery@Seattle.gov>; David Moehring <dmoehring@consultant.com>

Subject: Public Tools for citizens- geared to land use planning- May 13th Opportunity for the city

Importance: High

CAUTION: External Email

ADVERTISEMENT

[Learn how to give constituents the tools and confidence to manage their development and planning goals](#)

Join us on May 13 alongside panelists from two leading local governments — LA County and City of Marco Island. Get best practices for adopting virtual citizen self-service, training your customers, and transforming your organization's relationship with citizens and developers from one of regulation to collaboration.

Heidi Siegelbaum

Stormwater Strategic Initiative Lead

Washington Stormwater Center at Washington State University

Heidi.Siegelbaum@wsu.edu

(253) 445-4502

Home office: (206) 784-4265

<https://wastormwatercenter.org>

<https://pugetsoundestuary.wa.gov>

From: David Moehring <dmoehring@consultant.com>

Sent: Friday, April 9, 2021 7:01 PM

To: travis.west@davey.com

Cc: alexander@barshercapital.com; Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>

Subject: Three significant trees needlessly removed when adding a backyard cottage ADU

Importance: High

CAUTION: External Email



Tree Inventory

- Remove - Impacted
- Retain
- ITPZ

1051 NE 96th St.
Seattle, WA
December 2020

Prepared by:
DAVEY

Dear Mr. West of Davey (Trees) Resource Group,

Achieving Seattle's objectives of combatting climate change and reaching a 30% tree canopy (last estimate from 2016 LiDAR study was only 28%) is everyone's concern.

What happened today at 1051 NE 96th Street?

As an ISA certified Arborist (PD-2444A), Mr. West, it was surprising to see an otherwise stellar tree report conclude with the needless removal of three large trees in fair condition:

- Black locust 29-inch DBH, 30 foot canopy
- Black locust 25-inch DBH, 25 foot canopy
- Black locust 25-inch DBH, 30 foot canopy

As the added Detached Accessory Dwelling Unit and the excavations required seems to be well outside the inner critical root zone of these three large trees, how does an arborist conclude they should be removed to provide access for construction?

As density increased in Seattle... every tree within the next 16 years is important. Especially in a simple situation as this appears to be. We can have both density and tree canopy in a growing Seattle... there are numerous examples... and it is a shame this is not one of them.

Confused and curious,

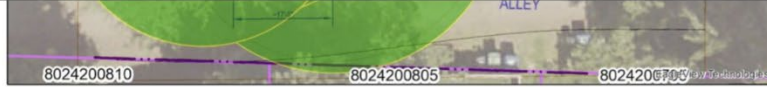
David Moehring, AIA NCARB
TreePAC
dmoehring@consultant.com

Arborist Report Tree Protection Plan

Here are the photos of the trees cut down today







- Remove - Impacted
- Retain
- ITPZ
- Avg Canopy

Tree Inventory

1051 NE 96th St.
Seattle, WA
December 2020



Prepared by: DRG Inc.
Prepared for: Alexander Barsher

December 2020
Page 11 of 12

Appendix B. Inventory Table

Table B1. A complete inventory table is available in a spreadsheet format if requested.

ID	Species	DBH (in)	Height (ft)	Average Canopy Radius (ft)	Condition	Grow space	Maintenance Task	Maintenance Detail	Preservation Priority	Owner
1	Black locust (<i>Robinia pseudoacacia</i>)	29	70	30	Fair	Lawn	No Priority	None	2	Client
2	Black locust (<i>Robinia pseudoacacia</i>)	25	60	25	Fair	Lawn	No Priority	None	2	Client
3	Black locust (<i>Robinia pseudoacacia</i>)	25	65	30	Fair	Lawn	No Priority	None	2	Client
4	Deodar cedar (<i>Cedrus deodara</i>)	36	70	25	Fair	Lawn	Priority 2 Prune	Structural Prune	1	Neighbor

9:29



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Seattle, Washington

From: michaeloxman <michaeloxman@comcast.net>

Sent: Friday, April 9, 2021 7:09 PM

To: David Moehring <dmoehring@consultant.com>; travis.west@davey.com

Cc: alexander@barshercapital.com; Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>

Subject: RE: [TREE LOSS] Three significant trees needlessly removed when adding a backyard cottage ADU

CAUTION: External Email

Howdy,

The arborist is told what to recommend by the developer in the Scope of Work for the contract.

Arboreally yours,

Michael Oxman

206-949-8733

www.treedr.com

From: Cynthia Slate <cynthiaslate@gmail.com>

Sent: Friday, April 9, 2021 7:43 PM

To: Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>

Subject: Re: Urban Forestry Commission

CAUTION: External Email

I want to ask the Urban Forestry Commission why homeowners take out trees if their lot is being sold for development?

For example, this lot which is in the upzone, had a 43 inch ABH Tulip Tree and a 33 inch Western Red Cedar) I asked the homeowner in 2018 if I could measure them



1219 NW 83rd St

for a Tree Walk) that the homeowner took out BEFORE the lot had the sign asking for public comment on the development. So we are not given a chance to comment.

I am wondering if the developer makes “ removing the exceptional trees” as a condition of sale?

Is someone keeping track of these trees that were cut down in my neighborhood?

I want to know does some government body knows these trees are gone?

Thanks,
Cynthia Slate



On Tue, Apr 6, 2021 at 1:59 PM Cynthia Slate <cynthiaslate@gmail.com> wrote:
I'm just so upset. Why does SDCI have an interest to lie about tree size and protect homeowners?

From: MICHAEL OXMAN <michaeloxman@comcast.net>

Sent: Sunday, April 11, 2021 8:43 PM

To: David Moehring <dmoehring@consultant.com>; travis.west@davey.com

Cc: alexander@barshercapital.com; Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>

Subject: Re: [TREE LOSS] Three significant trees needlessly removed when adding a backyard cottage ADU

CAUTION: External Email

Here's another project that is taking out 90 trees to build 9 houses abutting Kubota Garden.

On 04/09/2021 7:00 PM David Moehring <dmoehring@consultant.com> wrote:



Tree Inventory

1051 NE 96th St.
Seattle, WA
December 2020

Prepared by:
DAVEY

- Remove - Impacted
- Retain
- ITPZ

Dear Mr. West of Davey (Trees) Resource Group,

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Confused and curious,

David Moehring, AIA NCARB
TreePAC
dmoehring@consultant.com

Arborist Report Tree Protection Plan

Here are the photos of the trees cut down today







- Remove - Impacted
- Retain
- ITPZ
- Avg Canopy

Tree Inventory

1051 NE 96th St.
Seattle, WA
December 2020



Prepared by:
DAVEY **Resource Group**

Prepared by: DRG Inc.
Prepared for: Alexander Barsher

December 2020
Page 11 of 12

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9:29



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Seattle, Washington

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Help support TreePAC's efforts to create a stronger tree ordinance, more informed residents, and more informed City Officials.

Guide to save trees before it is too late:

<https://treepac.org/step-by-step-saving-seattle-trees-guide-new/>

Donate to non-profit TreePAC:

<https://donorbox.org/support-treepac-and-seattle-s-urban-forest?>

You received this message because you are subscribed to the Google Groups "SeattleTreeLoss" group.

To unsubscribe from this group and stop receiving emails from it, send an email to

seattletreeloss+unsubscribe@googlegroups.com.

To view this discussion on the web visit <https://groups.google.com/d/msgid/seattletreeloss/trinity-16f2ed0d-c713-4066-b48e-a5da1b757110-1618020046591%403c-app-mailcom-lxa07----->

From: Steve Zemke <stevezemke@msn.com>

Sent: Monday, April 12, 2021 12:24 AM

To: Weston Brinkley <weston@streetsoundsecology.com>; David Moehring <dmoehring@consultant.com>; Stuart Niven <panorarbor@gmail.com>

Cc: Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>

Subject: DCI data collection recommendations by UFC

CAUTION: External Email

Here is what the UFC adopted in the [draft Tree and Urban Forest Protection Ordinance](#) presented to Council and the Mayor. From page 19

D. SDCI shall enter into its database system all Significant trees on the site, trees removed, trees preserved, and trees replaced; noting tree species, common name, DSH, height, condition and location. Exceptional and Heritage trees shall be noted as such in the database system. All replacement trees planted as a result of in-lieu fees shall also be entered into SDCI's database system and identified by species, common name, diameter, height, and specific planting location in the city. SDCI may collect and enter such additional information as may be helpful in evaluating the effectiveness of 25.11 in preserving, protecting, and replacing Significant and Exceptional trees in Seattle.

E. SDCI will file quarterly reports with OSE regarding all data collected from its Tree 20 Removal and Replacement permits including trees removed, trees replaced on site and 21 trees planted off site as a result of fees-in-lieu paid into the Tree Replacement and 22 Preservation Fund.

Additional data though a site tree inventory includes more information and would be helpful to also be entered. This includes canopy spread and tree condition.

The full draft section on dealing with trees during development has more details on data that developers need to apply with their project proposals, including .

SMC 25.11.090 Significant Tree Removal and Replacement associated with Development starts on page 16 through page 22. Besides a site map and a landscape plan, a tree inventory and assessment report, and a development report evaluating options to maximize preserving significant trees (all trees over 6" DBH) is required..

Portland is miles ahead of Seattle in collecting tree data and using it to guide what happens during development.

See [Create a Tree Inventory and Tree Plan](#)

Here is Their 28 page guide on using Excell for their Tree Code requirements. [Tree Code - Excell Tool - user Manual](#)

Survey points for example include survey point number, Northing (y axis), Easting (x Axis), elevation, data collect code, deciduous or evergreen, common species name, log number, DBH, canopy radius, RPZ radius, notes.

Based on what Portland is doing, Seattle is not trying very hard to collect information or use it to evaluate or enforce tree protection or maximize tree retention.

Other cities also require developers to submit data and information on trees, not just put it on a site map like Seattle does and expect city employees to put it in a database.

Steve Zemke

From: Siegelbaum, Heidi <heidi.siegelbaum@wsu.edu>
Sent: Wednesday, April 14, 2021 7:39 AM
To: Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>
Subject: FW: 2021 Critical Areas Webinar Series Follow-up

CAUTION: External Email

Morning. This is for the City as it reviews its CAO ordinances which seem to have excessive exemptions. It could be useful to reset their approach. Please share.

All the best,
Heidi

Heidi Siegelbaum
Stormwater Strategic Initiative Lead

Washington Stormwater Center at Washington State University

Heidi.Siegelbaum@wsu.edu

(253) 445-4502

Home office: (206) 784-4265

<https://wastormwatercenter.org>

<https://pugetsoundestuary.wa.gov>

From: Splaine, Marie (COM) <Marie.Splaine@commerce.wa.gov>

Sent: Tuesday, April 13, 2021 9:03 PM

To: Dial, Gen (COM) <gen.dial@commerce.wa.gov>; Kuhta, Scott (COM) <scott.kuhta@commerce.wa.gov>

Subject: 2021 Critical Areas Webinar Series Follow-up

Critical Areas Webinar Attendees:

Thank you for participating in the online workshop series on critical areas and shoreline monitoring and adaptive management! We were so pleased to see the interest in this unique training opportunity. You are receiving this email because you indicated interest in technical assistance from one of our agencies.

Please see the list of agencies and contacts below to direct your specific technical assistance questions to. We will do our best to follow-up and provide guidance and support.



For guidance from the Department of Commerce, contact: Scott Kuhta at scott.kuhta@commerce.wa.gov



For guidance from the Department of Fish and Wildlife, contact: Keith Folkerts at keith.folkerts@dfw.wa.gov or your Regional Habitat Biologist [here](#).

For guidance contact staff

CARAs: Lauri

Wetlands: F

Frequently F

Shorelines: M

All webinar sessions and presentation materials can be found on our [project webpage](#). For general program questions, please contact: Gen Dial at (509) 675-5508, gen.dial@commerce.wa.gov or Scott Kuhta at (509) 795-6884 or scott.kuhta@commerce.wa.gov

Thank you again for your interest. We look forward to working with you!

Best,

Genevieve Dial | SENIOR PLANNER

Growth Management Services | Washington State Department of Commerce

WA 10 N. Post Street, Suite 445

Spokane, WA 99201

Cell: 509-675-5508

www.commerce.wa.gov | [Facebook](#) | [Twitter](#) | [LinkedIn](#) | [Subscribe](#)
