

Seattle Urban Forestry Commission

Peg Staeheli, Chair • Tom Early, Vice-Chair

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November 5, 2014.

Scott Kubly
Director, Seattle Department of Transportation
700 5th Avenue
Seattle, WA 98124

RE: Department of Transportation DR 3-2014 Street Tree Manual

Dear Scott,

The Urban Forestry Commission commends the Department of Transportation, specifically the Urban Forestry Section staff, for developing an exceptional manual for the management of our street trees. This document provides comprehensive guidance for residents, developers, contractors, and arborists.

After reviewing the document and having had an informative presentation from your staff, the Commission would like to make the following comments and recommendations:

Page 1 of the Director's Rule – Background

This section makes reference to public places. Parks are public places and clarifying that this Manual doesn't apply to Parks is important to avoid confusion. This also applies to Page 7 – General Overview of Regulations.

Page 4 - Purpose Intent and Scope:

Add: "...The proper care of existing trees supports citywide canopy goals, improves habitat, protects water quality..."

Revise: "In addition, the City of Seattle... during construction and site development of ~~land~~ public right of way that Low Impact Development Principles and..." It should be clear this manual is focused on right of way to avoid confusion with DPD.

Add: "This manual outlines....during right of way construction and adjacent site development..."

Delete following: "...from impervious surfaces ~~and reducing the need for additional impervious surfaces.~~"

Page 7 – General Overview of Regulations

See comment above.

It would be helpful to mention that management of street trees is done cooperatively with adjacent property owners earlier in the document. This section would be a good place to mention it.

Page 8 - Prohibited Acts and Penalties:

Shift the list of acts to follow the second sentence.
Relocate the “Glossary of Terms” paragraph to page 6.

Page 10 - Street Tree Permitting

Reorder for emphasis: “Property owners are responsible for maintaining any street trees adjacent to their property in the public right of way not identified as City-maintained and the trees on their own property which impact the public place. ~~and any street trees adjacent to their property not identified as city-maintained.~~”

If an owner has extensive frontage – multiple block faces such as UW, Seattle Schools, High Point OSA will there be a blanket permit for tree maintenance? Are there protocols required?

Page 12 - Street Tree Planting

The Commission requests more encouragement to plant medium to large category trees by reordering this list and being clearer on the need to plant the largest tree that can be accommodated. Small and columnar trees should be planted only if the space is limited.

Page 13 - Lateral Clearances

Clearance from underground utilities: It appears that the word “Edge” should be added to address the various widths of pipes, encased conduits, vaults, meters etc. And/or should vaults and meters have a specific call out for 7.5 feet clearance from centerline to minimize uplifting?

Page 14 - Standard Plan 100a

We have concern that the 5 foot minimum tree pit is not currently being enforced and the text on page 15 2nd paragraph under Soil Amendments “...minimum 24 inches greater than root ball diameter” conflicts with this standard plan .

Please clarify when you would not specify the root barrier along a curb.

Page 15

2nd paragraph: See comment above.

4th paragraph: best practice removes all the twine, burlap, plastic and wire baskets. Suggest clearer language.

Image is not relevant to the right of way (intent of this manual) and shows invasives.

Page 20 - Vegetation Management:

In addition to the vertical clearances on page 13, we suggest addition of a paragraph on vegetation maintenance on page 20. Residents and property owners are responsible for fall leaf pick up to maintain sidewalk clearance and to reduce street drainage problems.

Page 22 - Tree Removal and Replacement:

Please clarify the posting location and method. The image on page 31 shows clear tape around a tree. Is this preferred? Should image be relocated? See also page 27 Protect Tree Posting.

Page 23 – Tree Replacement Standards

Edit: “When a street tree is to be replaced ~~on-site~~ the following standards apply:”

Edit: “Where planting space....on the original ~~site~~location, alternative conditions...”

The Commission recommends that SDOT develop a fee-in-lieu approach to mitigate for loss of street trees in those cases where replacement is not feasible.

Page 24 - Tree Protection Information for Other Contractors

Tree protection is an area of significant concern where clarity in this Director’s Rule is critical since tree protection is an evolving practice of care among earthwork, utility, irrigation, and paving contractors. This is also an area where the Commission believes improvement is required between the oversight role of SDOT and DPD inspectors for frontage development. Strong protection of our existing trees sends the best message that Seattle is raising the bar for urban trees. (Please see page 72 of ISA’s publication Trees and Development).

The Commission believes it will also be important for SDOT to coordinate with DPD on inspector training.

Page 25 and page 26 - Critical Root Zone and Standard Plan 133

While the industry has not been definitive on the critical root zone, SDOT’s definition using Zone A is a concern as it is less restrictive than most definitions. SDOT’s definition may confuse site-based protection using the term CRZ meaning a greater area of the root zone. We also see a conflict with the “50%” wording under Penalties for Injuring Trees on page 29.

Page 25 - Zone A

It would help to clarify that this is SDOT’s definition. The Commission doesn’t think the document should lump together columnar and small trees. There could be very large columnar trees that would have significantly more root zone than a small tree. (See Second Ave. North of Seneca for example)

Page 27 - Zone B

It could be interpreted that the focus on protection is Zone A and there is nothing to encourage removal of unnecessary pavement. An example would be the oak trees in the median near HEC ED where removal of unnecessary pavement would benefit the trees.

Page 32 - Heritage Tree Program

Add information on how to nominate a tree.

Clarify where a plaque would be placed.

The reference to DPD’s term Exceptional Trees should be avoided as this is not consistently enforced.

Page 33 - Additional Resources

Add: Trees and Development: ISA Publication by Nelda Matheny and Jim Clark

Appendix A

Add a reference point to Appendix A for guidance in writing appropriate ANSI 300 specs.

Thank you for the opportunity to comment. We look forward to continuing working with SDOT to protect our urban forest.

Sincerely,

A handwritten signature in black ink that reads "Peg Staeheli". The signature is written in a cursive, flowing style.

Peg Staeheli, Chair
Seattle Urban Forestry Commission

cc: Mayor Ed Murray, Council President Burgess, Councilmember Bagshaw, Councilmember Clark, Councilmember Godden, Councilmember Harrell, Councilmember Licata, Councilmember Rasmussen, Councilmember O'Brien, Councilmember Sawant, Jill Simmons, Barbara Gray, Darren Morgan, Eric McConaghy.

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