

# Seattle Urban Forestry Commission

Matt Mega, Chair • John Small, Vice-Chair • Nancy Bird • Gordon Bradley  
Tom Early • John Floberg • Jeff Reibman • Peg Staeheli

December 5, 2011

Margaret Glowacki  
Shoreline Planner  
Department of Planning and Development  
700 5th Avenue, Suite 2000  
P.O. Box 34019  
Seattle, WA 98124-4019

RE: Follow up on UFC comments to the Proposed Draft Shoreline Master Program Regulations

Dear Ms. Glowacki:

Thank you for the City of Seattle Department of Planning and Development (DPD) responses to the Seattle Urban Forestry Commission's (the Commission) comments on the first public draft of the Shoreline Master Program Update. DPD's responses to our comment include two requests for more information and one that warrants further input from the Commission

**Item 1:** DPD requested language from the Commission prohibiting land disturbance within the critical root zone of trees during activities related to vegetation and impervious surface management activities:

We suggest that in sections 23.60.190.D.1.b and 23.60.190.E.1.b the existing language, "land disturbance is minimized and kept within the planting area; and," be changed to, "land disturbance is minimized, limited to the planting area and does not include the critical root zone of any tree over 6" DBH."

**Item 2:** The Commission does not feel that our comment (#22 under your responses to comments on environmental quality) has been adequately addressed. We suggest that the term, "native vegetation," as it is applied to the restoration of site vegetation in the Shoreline Setback Zone and the Shoreline District throughout section 23.60. 190 be changed to, "native vegetation consisting of a mix of groundcover, shrub and tree species adapted to the site conditions." to 23.60.152

**Item 3:** DPD requested language from the Commission to make clearer the professional standard for the qualifications of persons preparing re-vegetation/restoration plans. We state that the standard of training and expertise related to the type of ecological environment where the work will occur, "is

vague and lacks objective standards such as professional accreditation or state licensing requirements.” This is in reference to the following section – the Commission’s suggested revisions are underlined.

23.60.190 Vegetation and impervious surface management

A. Application and plans

1. An application and a plan are required for all actions allowed under this Section 23.60.190, unless specifically provided otherwise in this Section 23.60.190.
2. Applications shall be made on the form approved by the Director.
3. Plans prepared under this Section 23.60.190. shall be consistent with the standards promulgated by the Director and with best management practices.
4. Plans prepared under this Section 23.60.190 shall be prepared by a qualified professional with training and experience related to the type of ecological environment where the work will occur

Thank you for your consideration of these comments.

Sincerely,



Matt Mega, Chair  
Seattle Urban Forestry Commission



John Small, Vice-chair  
Recommendation author  
Seattle Urban Forestry Commission

cc: Diane Sugimura, Jill Simmons, Marshall Foster, Brennon Staley, Council President Richard Conlin, Councilmember Bagshaw, Councilmember Burgess, Councilmember Clark, Councilmember Godden, Councilmember Harrell, Councilmember Licata, Councilmember Rasmussen, Councilmember O’Brien, Michael Jenkins, Christa Valles

Sandra Pinto de Bader, Urban Forestry Commission Coordinator  
City of Seattle, Office of Sustainability & Environment  
PO Box 94729 Seattle, WA 98124-4729 Tel: 206-684-3194 Fax: 206-684-3013  
[www.seattle.gov/UrbanForestryCommission](http://www.seattle.gov/UrbanForestryCommission)