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Hao Liang (Position #6 – Landscape Architect – ISA) • **David Moehring** (Position # 8 – Development)
Blake Voorhees (Position # 9 – Realtor) • **Laura Keil** (Position #10 – Get Engaged)
Jessica Hernandez (Position #11 – Environmental Justice) • **Jessica Jones** (Position # 12 – Public Health)
Lia Hall (Position #13 – Community/Neighborhood)

June 1, 2022

Seattle Parks and Recreation
100 Dexter Avenue N.
Seattle, WA 98109

RE: Urban Forestry Commission response to Seattle Parks and Recreation Tree Management Policy

Dear Interim Superintendent Christopher Williams,

Duwamish Lands (Seattle, WA) – The Urban Forestry Commission (UFC) appreciates the May 18, 2022 presentation from Seattle Parks and Recreation (SPR) representatives Todd Burley and Nicholas Johnson regarding the amendments to the Tree Management Policy. With developed parks and urban natural areas comprising approximately twenty percent of Seattle’s urban forest canopy (based on the [2016 tree canopy assessment](#)), the tree preservation and restoration work of SPR is vital in achieving canopy cover objectives of the city’s Comprehensive Planⁱ.

The UFC appreciates many of the updates that SPR has thoughtfully included that clarify and streamline tree protections requirements such as creating guidance for pruning and tree maintenance for private property adjacent to parks and aligning pruning practices with the ANSI-300 standards. In addition, we appreciate the updates to recreation policy in parks to improve protections.

Consistent with our prior recommendations to the Mayor and City Council, the UFC recommends that Seattle Parks and Recreation consider the following clarifications or modifications:

- Within References section 4.0, include SDCI Directors Rule 15-2008 that describes Exceptional Trees and tree groves.
- From Criteria section 5.1.1, Equitable Distribution of Services, provide specific plans from SPR that not only acknowledge the importance of Race and Social Justice Initiatives but also establish an annual budget for identified census tract area parks and natural areas, for both planting and maintenance services.ⁱⁱ

- Within section 5.2, Capital Projects, the UFC would suggest that SPR identify a removed-tree replacement ratio greater than the 2:1 required by Executive Order 03-05 when rare and ECA trees have been removed.
- Your presentation on page 9 references “Climate resiliency incorporated into planting elements, particularly for establishment periods.” This should be included within the proposed policy, as SPR records on new tree survival note relatively low survivability for tree plantings.ⁱⁱⁱ
- With the more intense heat and prolonged drought conditions Seattle is experiencing as the climate changes, the current standard of three years maintenance to ensure establishment may no longer be enough to help replacement trees thrive. The UFC heard SPR share that maintenance schedules would be at the discretion of SPR arborists with longer maintenance periods implemented as needed. We appreciate that flexibility in terms of maintenance may be necessary due to uncertainty associated with future climate impacts, but **request that minimum standards are specified to ensure there is a clearly stated baseline of establishment care.** We believe this is important to engender trust and support from the public who have concerns that maintenance periods may be reduced. The UFC recommends that replacement trees will be cared for five years as a minimum standard to better ensure establishment and survival.
- Expand on section 5.8.2 Vandalism and Illegal Cutting, relative to compensation for damages, to be consistent with other city departments, to not only include the appraised value in accordance with the current version of the ISA Guide for Plant Appraisal, but also to include costs for planting and five years of subsequent maintenance. Also, topping or removal of rare specimen (5.8.3), trees removed with tree groves, and large trees considered exceptional under SDCI’s tree code should be compensated at three times the appraised value in alignment with other departments’ compensation policies.
- Likewise, to ensure consistency across departments, within Definitions section 6.0, expand on acceptable certified arborists as recently amended by the City Council to include registration.
- Regarding section 5.6 Planting, considerations for tree planting and species selection should consider the heritage of the park’s planning and design.

SPR requested suggestions for other stakeholders to reach out to regarding this policy update.

Suggested organizations are below:

- Got Green
- Community Land Conservancy
- Beacon Hill Community Council
- Duwamish Tribe

Thank you again to Todd Burley, Nicholas Johnson, and the many others at SPR who care for the hundreds of thousands of trees that make Seattle parks so special.

Sincerely,



David Moehring



Julia Michalak, Co-Chair



Joshua Morris, Co-Chair

cc: Jessyn Farrell, Michelle Caulfield, Sharon Lerman, Urban Forestry Management Team, Urban Forestry Core Team, Todd Burley, Nicholas Johnson

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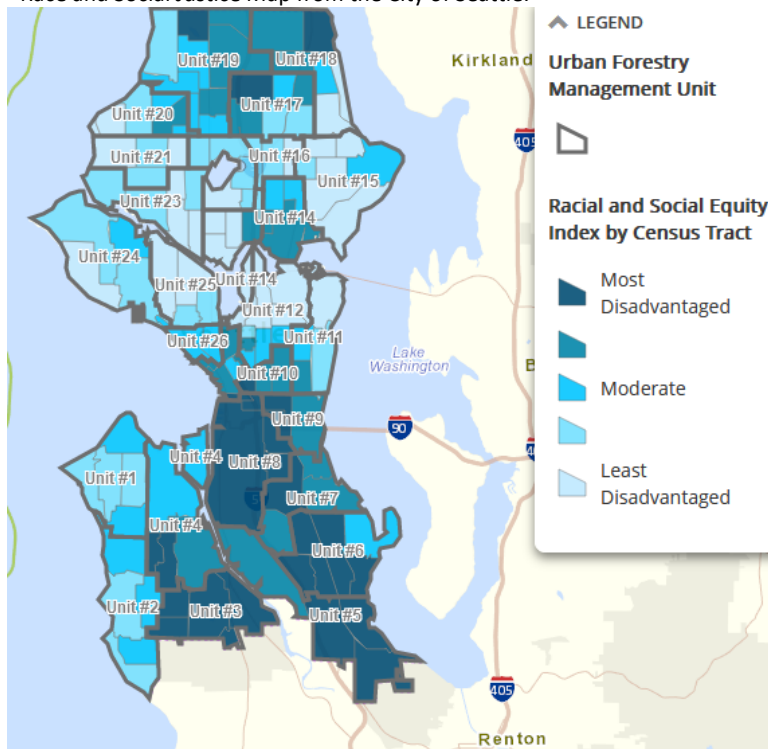
¹ The 2016 Seattle Tree Canopy Assessment, Table 1 identifies a 30-percent canopy cover goal citywide to be achieved within the next 15 years by 2037 based on the 2035 Seattle Comprehensive Plan. Of this total cover, developed parks are 6 percent and natural areas at 14 percent canopy cover. The UFC anticipates an update to the assessment in summer 2022.

Management Unit	Land area (% of city)	2016 canopy cover	2037 canopy goal (set in 2007)	% contribution to city's canopy cover
Single-Family Residential	56%	32%	33%	63%
Multi-family Residential	11%	23%	20%	9%
Commercial/Mixed-use	8%	14%	15%	4%
Downtown	1%	10%	12%	<1%
Industrial	11%	6%	10%	2%
Institutional	2%	25%	20%	2%
Developed Parks	4%	34%	25%	6%
Parks' Natural Areas	7%	89%	80%	14%
City total	100%	28%	30%	100%
Right-of-way (runs through all other MUs)	27%	23%	24%	22%

Table 1. Percentage of city's landmass, current canopy cover, targets by MU and MU contribution to city's canopy cover

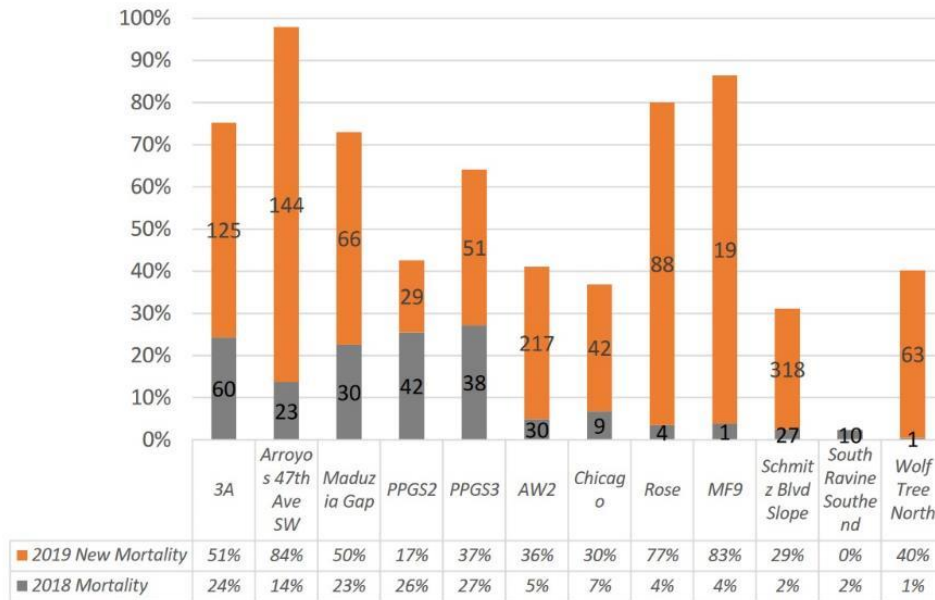
Source: <http://www.seattle.gov/Documents/Departments/Trees/Mangement/Canopy/Seattle2016CCAFinalReportFINAL.pdf>

ii Race and Social Justice Map from the City of Seattle:



iii Reference from the SPR table for Seedling Survival:

Mortality Per Year - Planted Seedlings by Zone



Seedling-Survival-Report-2019.pdf
 SEATTLE PARKS AND RECREATION / GREEN SEATTLE PARTNERSHIP
 SEEDLING SURVIVAL ADDENDUM REPORT
 December 2019 final