

## Public input to Draft 2020 Urban Forest Management Plan 12/9/20

Below is input provided on the draft 2020 Urban Forest Management Plan via emails sent to Sandra Pinto (Urban Forestry Policy Advisor with the City's Office of Sustainability & Environment). The Urban Forestry Core Team will be discussing this input along with comments provided through an online comment form.

The purpose of this document is to make the 'raw data' available to the public for process transparency.

**From:** James Davis <jamesdavis1400@gmail.com>

**Sent:** Tuesday, November 3, 2020 3:17 PM

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

**Subject:** Re: Seattle 2020 Draft Urban Forest Management Plan - public input open through November 30

### CAUTION: External Email

Hello Sandra, thank you for asking for input. I will follow up with the comment form but there are three items that I believe should be adjusted or added.

First of all, the attached Seattle Urban Forest Today page indicates Seattle had between 1.6 and 3 million trees as of 2007. **I question the inclusion in the draft report that we have 4 million trees.**

Additionally, I believe that the report should include that 64% of the trees are 12 inches in diameter or less, per the attachment. It is important to give readers a sense of what our trees consist of from a size perspective from the last time we looked. (And it is okay to say our information is limited and further studies are required.)

Finally, for the tree benefits description, it should be clearly stated that the bulk of the environmental benefits come from larger trees of 20 inches and greater in diameter and Evergreen trees of that size provide even more benefit because of their year long duration. That is why, in my opinion, we can't skim over tree size and solely use the more vague canopy measure.

It is a big day for the future of democracy and I had a moment while waiting for the election results later this afternoon to write this. I will also spend more time looking at the draft but felt these items were important to discuss at the next UFC meeting.

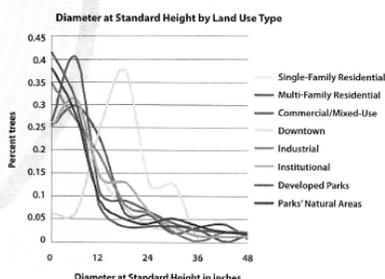
Best regards, Jim Davis

Table 2: Evergreen/deciduous breakdown

Land use	Evergreen		Deciduous
	Broadleaf	Conifer	
Single-Family Residential	15%	34%	51%
Multi-Family Residential	9%	9%	82%
Commercial/Mixed Use	0%	40%	60%
Downtown	0%	0%	100%
Industrial	0%	32%	68%
Institutional	0%	16%	84%
Developed Parks	8%	20%	71%
Parks' Natural Areas	8%	10%	82%
City-Wide	9%	22%	69%

City-wide, about 34 percent of trees are 6 inches in diameter-at-standard-height (DSH) or smaller and 64 percent of trees are 12 inches in diameter or smaller. The prevalence of smaller-sized trees suggests that most trees are well below their growth potential; however, without additional data it is not possible to distinguish the cause of this pattern, which could be due to the predominance of small species trees, frequent removal, or even to an increase in the planting of new trees.

Figure 9: Diameter of trees by management unit



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

**Sent:** Monday, November 30, 2020 9:17 AM

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

**Cc:** David Moehring <moehringconsultant@gmail.com>; Stuart Niven <panorarbor@gmail.com>; Kevin Orme <ovaltinelatte@hotmail.com>; Steve Zemke (stevezemke@msn.com) <stevezemke@msn.com>

**Subject:** Comments on Urban Forestry Management Plan

**CAUTION: External Email**

Dear Sandra:

I filled out the survey monkey associated with the draft urban forestry management plan. I also include it as an attachment here for the public record. An additional priority not listed in your drop down list in the survey is that all the actions that relate to environmental priority communities must apply to ALL communities throughout the city. This is a huge omission.

Please let us know how you plan to address public comments and whether these comments will be shared with all City departments. Thank you for your work on this initial draft.

All the best,  
Heidi Siegelbaum

Heidi Siegelbaum  
[Heidi@calyxsite.com](mailto:Heidi@calyxsite.com)

Dear Colleagues:

Below please find comments on the current draft Urban Forestry Management Plan.

### Policy and action

- Need examples of policy- what actions? And are actions different from policy?
- Need to link ecosystem services to explain what this term means
- HOW do trees support character?
- HOW do trees support “quality of life?” What IS quality of life?
- “Supports Seattle’ public health” HOW?
- Need explanation of stormwater
- Puget sound IS the Salish Sea- many don’t recognize the latter name
- Heat Island Effect needs explanation
- Don’t say there is a relationship between the “natural environment” and improved health- clarify that trees are part of the biophilia- things that are alive –and that there is a demonstrable correlation between human health and exposure to trees
- Emerald ash borer is not local- needs a links
- Reference to Urban ag on page 3 very unclear- you are referring to the thousands of fruit trees- what else?
- Seattle relationship to trees conveniently excises all the attempts to write a cogent and enforced tree ordinance. Current one is 11 years old and not enforced
- <https://friends.urbanforests.org/coalition-for-a-stronger-tree-ordinance/>
- <https://www.seattle.gov/Documents/Departments/OSE/SeattleEquityAgenda.pdf>

### Suggested Framework for the UFMP

<https://www.kirklandwa.gov/Assets/Planning/Planning+PDFs/Urban+Forest+Management+Plan.pdf>

We would recommend you conduct a **cumulative impacts assessment** of the services lost from allowing up to, 4000 mature trees to be cut each year and link our urban forestry plan with our Climate Action Plan, Green New Deal and other city-wide initiatives. Our trees policies feel very siloed.

- **Environmental Equity Assessment/Environmental Justice “Screen”** : Build on the existing equity assessments in the City and community to create a cumulative impacts assessment methodology that deepens understanding of the interactions of multiple environmental hazards rather than only a single pollutant at a time. This assessment should include the impact of systematic removal of mature trees on air quality, asthma, flooding and heat island effect.

The assessment or screen must further consider how issues of racial discrimination, lack of economic opportunity and other social conditions are exacerbating residents' and workers' exposures to environmental hazards. This will require partnerships with agencies such as Puget Sound Clean Air Agency and King County Public Health, as well as other city departments. This tool must be shaped through community-based participatory research and include collecting community stories to augment data. It should consider community conditions (transit, housing, food access/insecurity, parks, air quality, sidewalks, climate resiliency, youth development, cultural hubs, etc.) and others to be determined.

- **Page 4 timeline:** You need to put in the years that tree ordinances were enacted. It feels this was purposely excised.
- **Page 8:** You write that the city has an important regulatory and supporting role for private trees yet you don't say what or how.
- **Public Meetings:** I never heard a thing about public meetings about the unfolding strategy – you held 3 listening sessions at 3pm in the middle of the day, a time when many people are working- really? This is your transparency and outreach plan?
- **The Plan does not appear to address the comments from 9/14/18 in which tree advocates had comments on enforcement, the failure to enact a current tree ordinance, how to protect existing trees etc. You must address these important topics in the UFMP.**
- **P. 7-** you fail to note that most trees in Seattle are on *private property* and that the urban forest includes trees on private property

## Barriers

- **Maintenance costs:** It is true that maintenance costs are expensive but, in many cases, maintenance is undertaken by residents, not the city. You also have contracts with Forterra and other community groups for park maintenance. We would recommend you step up your efforts to publicize the value and care of trees in all departments and particularly in your Trees for All program. This program needs significantly more emphasis on stewarding existing trees. You could also reach out to our new residents to engage them in place-based care through Amazon, Google and Facebook user groups.

<https://urbanforestry.indiana.edu/doc/publications/2018-Hauer-Volunteer-Partnership-Baseline.pdf>

<http://efc.web.unc.edu/2013/08/09/financing-urban-forestry/>

- **Page 14/Views:** Yes, of course everyone wants views and sun but we live in Seattle. When trees are cut for views, there are often erosion and landslide issues, lead to slope destabilization. You could shortcut this by simply enacting laws that prevent mature trees from being removed for views. If you are unwilling to do this, you could message more directly to homeowners much in the same way SPU messages to homeowners about natural yard care, and related land use issues.
- **Transportation Infrastructure:** Given the value and multiple benefits of trees, every effort should be made and required under law, to accommodate large trees and their root systems.
- **Page 15/Development and Urban Design:** There are numerous ways to address this quandary: (1) allow greater height and require developers to build around trees (yes, it's possible and we have many examples); (2) close the 2010 Code Amendment loopholes which allow 4 and 6-pack unit developments with no room for ANY vegetation much less trees; (3) enforce your own codes since they are routinely violated. Where is your enforcement record and how are the collected fines being used? (4) Kathy Wolf at UW has written extensively on how to design street scapes and street trees for businesses;

[https://nacto.org/docs/usdg/city\\_trees\\_retail\\_wolf.pdf](https://nacto.org/docs/usdg/city_trees_retail_wolf.pdf)

(5) there are also design guidelines for how to landscape for safety. Trees by themselves do not create dark spaces. Dense bushes and lack of lighting do. This sounds like a throw away excuse.

Did the development community write this section? It sure seems like it as written as it's just a series of excuses for the City to avoid active problem solving.

Some jurisdictions create assessment districts (Landscape and Lighting Assessment District) or issue general obligation bonds to help finance.

Large trees should be protected from removal altogether given our 10-year window to address the worst of climate change impacts. You acknowledge on page 12 that trees sequester carbon yet you allow thousands of healthy trees to be cut each year. Trees and other forms of green infrastructure need to be incorporated into the city's Climate Action Plan.

- **Need for Maps:** There are NO MAPs in the report- when you refer to management units, you need GIS maps of where these are located to make sense
- **P. 10-** there are few trees in low canopy places because the trees were cut, not because there are apartment buildings. In many lots where apartment buildings are located, this

is where some of our biggest trees are actually growing. This is particularly the case with older buildings.

- **Need a Tree Inventory:** It's unthinkable we have no inventory (page 11) and we need inventories on private land
- I- Tree program needs links
- Tree canopy discussion: You should have accompanying maps here to show relative canopy cover

## Existing Policies

Conspicuously absent in this section is our current **TREE ORDINANCE**. Put reference in this section and include the City's Climate Action Plan. Please also include reference to the Puget Sound Clean Air Agency's policies: <https://pscleanair.gov/31/Priorities>

Trees for Seattle contains many positive elements but it still lacks focus on helping homeowners take care of and cultivate a stewardship ethos around their existing private trees. This is a critical gap that needs to be addressed. It would also be very helpful if the City paid for some tree signage for public trees which indicate the environmental, health and social benefits of trees. Many cities have this including substantially smaller towns.

- **Page 27/Regulations:** All the regulations cited on this page should be hyperlinked for easy reference. More text is needed in this section because listing them alone does very little for building literacy around the topics and their role in urban forestry.
- **Page 28/Balance Competing Priorities:** This section reads like a Presidential Pardon. With this planet-sized statement, you could make the argument that all these issues eclipse the value and role of urban forests. **It is your responsibility to ensure we have a thriving urban forest WHILE creatively addressing all these issues. A healthy, robust and distributed urban forest will help to support all the other focus areas in this section.**
- **Page 29/ UFMP strategies. THIS SECTION IS SERIOUSLY DEFICIENT.** Strategies need targets, dates, persons accountable, budget and implementation detail. This is merely a laundry list and needs to have substance developed for each strategy. The UFMP action agenda does help but still needs dates, targets, budgets and people's names.
- Under Strategy 7, page 32, there needs to be more than "explore ways to help property owners." Which property owners? Residential, property management companies and their landscapers? Commercial? Industrial? Even industrial parts of the city use green infrastructure. Given how long you have been working in urban forestry, these ways should already be a part of your knowledge and practice. **This section is also deficient because it only targets forested parklands and not private property owners.**

- Page 33/Funding: This section needs more analysis and needs to include more than just helping to remove invasive weeds.
- Page 35/Key Performance Indicators: You should add a KPI that addresses number of groves, mature trees, and exceptional trees that are SAVED from cutting regardless of location. Also, OSE appears to have no metrics.
- Healthy soils: The city currently permits clearcutting, soil scraping and compaction in development and redevelopment sites. This routine and profligate practice undermines healthy soil conditions.
- Page 36/Research Needs:

**Add:** “Comparing the ecosystem benefits of 6 inch, 18 inch and 24 inch trees compared to seedlings and analyze how much time it will take for the seedlings to exhibit the same biological functions as their mature counterparts.” This research would support the impact of tree removal and seedling planting on the City’s ability to address climate change, stormwater, habitat, air quality and heat island effect issues currently in the City’s policy portfolio.

#### Closing Remarks

Thank you for your work on this draft plan. While it has the backbone of what a plan can be, it falls far short of being an actual management plan and needs considerably more work and analysis.

With best regards,

Heidi Siegelbaum

Seattle, WA

November 30, 2020

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**From:** Kathleen Wolf <kwolf@uw.edu>

**Sent:** Monday, November 30, 2020 9:11 AM

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

**Cc:** kwolf@uw.edu

**Subject:** Re: Seattle 2020 Draft Urban Forest Management Plan - public input open through November 30

CAUTION: External Email

Dear, Sandra,

Thank you for the opportunity to review the UFMP. The document is thorough in presenting the situations of urban forestry in Seattle, and action goals going forward.

I completed the online comment form. But I also did a complete read through of the plan and provided comments in the .pdf. The doc is attached. Most of my comments are copy editing suggestions, but I did offer some responses to the presentation of sections, and their order.

I offer two high level responses (repeating some comments in the .pdf):

**1. Balance of benefits and challenges.** First, these sections are presented some distance apart in the document. Taken as a whole the document is weighed much more heavily to the challenges. If I were a reader who is less supportive of trees, the practical concerns in the challenges section would be far more influential in my take-aways from the document. I suggest a more extended treatment of benefits, and offer the same level of detail as the challenges (or edit the challenges to the same general level of statement as the benefits). And perhaps place this related content closer together, knitting them by way of content about trade-offs, net benefit, and need for innovation.

**2. Where is the plan?** I read a lot of interesting and informative content before getting to the purpose of the document, goals and aspirations, on page 28. It seems that this content should be more prominent earlier in the document. For instance, the last subsection of Chapter 1, say 2 pages should be an executive summary of the goals, strategies, and action agenda. Otherwise, the reader has no idea where the 20+ pages between Chapters 1 and 4 is going.

Hope this is helpful!

Kathy

**Kathleen Wolf, Ph.D.**  
*Research Social Scientist*  
[kwolf@uw.edu](mailto:kwolf@uw.edu)

University of Washington, College of the Environment  
School of Environmental and Forest Sciences

info at:  
[Green Cities :: Good Health](#)  
[Human Dimensions of Urban Forestry & Urban Greening](#)

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(Comments provided throughout Draft UFMP document – too long to paste in this document. Is provided separately).

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**From:** michaeloxman <michaeloxman@comcast.net>  
**Sent:** Monday, November 30, 2020 12:23 PM  
**To:** Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>  
**Subject:** Comments on UFMP

CAUTION: External Email

Howdy,

Thanks for the opportunity to send public comment on the draft 2020 Seattle Urban Forest Management Plan. The survey monkey form didn't work, so I'm sending the comments here.

- 1) Lack of a tree inventory database excludes decisions based on science. The original 2007 UFMP stressed scientific data as the basis for making good management decisions. The substitution of aerial photos every few years is a cheap replica of keeping a record in a single searchable spreadsheet, and requiring staff to update info each time they make contact with a particular tree.
- 2) Tree assessment methods are subjective and lack metrics to view progress towards goals recommended by the city auditor.
- 3) Wasted efforts abound in current staff efforts, with records unavailable to citizens, even presenting redacted results of public records that we requested.
  
- 4) The UFMP Survey Monkey form attempts to slant equity concerns to higher priority.
- 5) Highest priority should be to assess viability of an individual tree's health & structure, and conserve it in its location.
- 6) The 2037 goal, while admirable, does not contain short term goals, and we should have 1 and 5 year goals.
- 7) The 2018 Davey Resource Group report's scoring system, of how well staff thought their performance was doing, showed upper managers & low budget prevent effective forest cultivation.
- 8) Nowhere in the draft UFMP does it say that developer profit should be the highest and best land use, and that forest ecosystem integrity is subservient, but that is the reality of the hurdle the draft should be addressing.
- 9) Contiguous wildlife corridor enhancement should be created by acknowledging the 'groveness' of a neighborhood, not only by emphasizing the ethnic or economic status of the people living there.
- 10) The spell checker in the survey monkey form changed words and my intended meanings. The survey monkey form changed my priority list while I tried to scroll upwards or downwards to see choices out of view on my screen. The survey monkey form timed out before I finished composing my comments, and my ranking responses were lost (but not these comments, which were copied prior to the crashing of the survey monkey session).
  
- 11) The draft UFMP is 2 years late. The Comp Plan goal was changed from requiring a 1% increase in canopy cover each year, to a watered-down 'net increase in canopy cover', and then to a 5 year UFMP update, and now we can't even do that.
- 12) When the Urban Forestry Commission was appointed 11 years ago, there was a discussion whether to give it advisory powers or regulatory powers. The decade of the UF Commission's more than a hundred white papers giving specific advisory recommendations has shown the the Seattle administration discounts ecological land management, and the UF Commission needs to have its power expanded to require UF Commission regulatory approval of zoning and building permits.
- 13) The 'disarray' of the secret meetings among city urban forestry staff can be helped by implementing the Washington Public Meetings law, to open up agendas, minutes, and attendance to the public.
- 14) The auditor recommended a single authority to improve coordination between departments, yet a decade has passed with weak mayors failing to appoint a leader.
- 15) No department-wide urban forestry budget request has ever been submitted by the Mayor to the Council for funding.

16) A list of all urban forestry expenses was asked for in a 2019 public disclosure request, but the reply failed to respond with anything other than "The entire \$6 billion dollar city budget is posted on the website; just go there and dig it out yourself", which is a violation of the public records law.

I'll repeat the request: "Please list all staff and equipment expenses spent on urban forestry in 2019, according to department and individual staff job description".

17) The draft's emphasis on location of trees shown by photogrammetric data is quantitative data that fails to give qualitative data to tree managers.

Arboreally yours,

Michael Oxman  
ISA Certified Arborist #PN-0756A  
[www.treedr.com](http://www.treedr.com)

Sent from my Verizon, Samsung Galaxy smartphone

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**From:** Ann Stevens <annbstevens50@gmail.com>  
**Sent:** Monday, November 30, 2020 2:36 PM  
**To:** Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>  
**Subject:** Seattle 2020 Urban Forest Management Plan

**CAUTION: External Email**

In reading over the draft 2020 Urban Forest Management Plan I have these comments:

1. The increase in housing density does not have to mean removal of trees in the single family residence zones, where a large portion of the large trees grow in Seattle. The plan could recommend that the footprint limit be reduced on single family lots. This would leave more unbuilt area to preserve existing trees or add additional trees, and probably reduce the price of the houses built so that they are more affordable.
2. Much of the plan lays out all the different agencies that deal with the urban forest and what they do. However, I do not see a recommendation to reduce this complexity and focus urban forest protection and assessment in one office whose priority is the health and retention of the urban forest.
3. The plan used the lidar study (2016?) as the baseline for canopy. That study included very small trees as part of the canopy. This does not recognize that such trees contribute very little to the environmental services provided by trees. The results of a study with that flaw is a poor baseline to assess progress or deterioration in the urban forest in Seattle.
4. The Davey report findings state that Seattle has a "Strong tree protection ordinance focused on maintaining mature trees with effective procedures." I believe most informed Seattleites, other than developers and builders, would strongly dispute this finding.

Ann Stevens  
Seattle resident

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**From:** Calvin Burnap <cburnap@gmail.com>  
**Sent:** Monday, November 30, 2020 3:52 PM  
**To:** Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>  
**Subject:** Comments for Urban forest management

**CAUTION: External Email**

Hello!

If it's not too late, please include my comments to request city attention and funds towards:

protection and care of existing trees;  
steward city lands for overall canopy and floor health;  
increase overall quantity of green spaces;  
increase habitat for insects and animals;  
and, accordingly, ensure housing for all such that no life is superior to another so that no competition is required and no displacement is needed to make space for an other life.

Sincerely,  
Calvin Burnap  
Seattle, 98102

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**From:** aileen langhans <aileenmargaret@yahoo.com>

**Sent:** Monday, November 30, 2020 4:32 PM

**To:** Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>; Pedersen, Alex <Alex.Pedersen@seattle.gov>; Durkan, Jenny <Jenny.Durkan@seattle.gov>; aileen langhans <aileenmargaret@yahoo.com>

**Subject:** Comment Letter on the Urban Forest Management Plan 2020 - Draft

**CAUTION: External Email**

Please review and enter our comment letter into the records.

The Langhans Ladies

5215 19<sup>th</sup> Ave NE  
Seattle, Washington 98105

November 30, 2020

Sandra Pinto Urrutia  
Urban Forestry Policy Advisor  
City of Seattle Office of Sustainability & Environment  
700 5th Ave Seattle, WA 98104  
206.684.3194 | [Sandra.PintoUrrutia@seattle.gov](mailto:Sandra.PintoUrrutia@seattle.gov)

RE: The Urban Forest Management Plan 2020 – Draft  
The on-line survey

Dear Sandra Pinto Urutia:

Our family has been residents of Seattle since 1955, specifically in the University Park neighborhood. We three daughters now own the family home and have become more involved in the community. But our concerns are not restricted to the boundaries of our family neighborhood, unlike what is portrayed in this draft document (*"It is primarily white, upper-income communities that shape and benefit from environmental policies, approaches, and outcomes."* – page 20); they expand both geographically and generationally to encompass the larger community of Seattle. Upon reviewing the Draft Urban Forest Management Plan for 2020 and reflecting upon its contents, we would like to submit the following feedback.

**The positive aspects of the report:**

1. Recognizing the valuable resources of multiple generations: *"Expand volunteer programs focused on the elders and children"* (page 32): This action will tremendously enrich the program, by engaging multiple generations, each of which can bring its own history, experience, culture, and education to produce a stronger, more lasting commitment to our Urban Forest and its contributions to the health, safety, and well-being of our larger community. Furthermore, it renews a lost connection between two seemingly disparate generations, both of which are valuable contributors to the upbringing of our young people. Having lived in a home with two immigrant grandparents, Irish and Armenian, we greatly benefited from their wisdom, stories, folk legends, and cultural values.
2. Addressing invasive species and allergies
3. Addressing the cultural aspects of various groups, including the indigenous people, whose wealth of experiences and rich history of respect for the environment provide both inspirational and practical guidelines for all Seattleites.
4. Realizing the importance of the tree canopy to our non-human neighbors – insects, wildlife, etc. This includes the vibrancy of multi-sensory input, which fosters human contentment – from the colors, sounds, textures, and aromas presented to us within a rich Urban Forest. Especially important, too, is the recognition of the salmon populations which are at risk from past human behavior.
5. Balancing the expansion of trees with the need for safety, visibility, property protection, and privacy.

6. Supporting our residents regarding tree selection, upkeep, removal, replacement, and planting locations.
7. Creating a network of cooperation among various City Agencies and Departments to enforce and nurture the goals of the Urban Forest Plan. This includes the assignment of responsibilities to each department.
8. Acknowledging and balancing competing uses, such as solar technology, views, utilities, and transportation infrastructure
9. Addressing sidewalks and ADA requirements, with respect to tree locations, root damage, etc. There must be enough room around trees for walkers and wheelchairs, etc.
10. Inspiring our youth to become engaged in creating a new vibrant Urban Forest legacy: *“Create a program to improve access for people in environmental equity priority communities to internships, apprentices, and jobs in urban forestry.” (page 31)* This is an admirable goal, provided it doesn't lead to just another “jobs program” with a bloated administrative body.

### **Some negative aspects of the plan:**

Now we would like to address the following assumptions, omissions, and conflicting statements within the report:

1. **PERMEABLE PAVEMENTS:** The plan missed the opportunity to discuss new advancements which could address the negative conflict between trees, pedestrians, and below ground infrastructure, especially when planted along paved areas. Specifically, there is no mention of any recent improvements in pavement materials, especially those with increased permeability. Such materials would decrease the pooling of rainwater on sidewalks and paths (and in the winter, the creation of slick ice sheets), and would allow that water to soak more effectively and efficiently into the soil, providing nourishment and nutrients to the tree roots and preventing the need for those roots to push ever deeper underground to the sewer systems or into people's yards, etc. While these options might still be limited, discussion of and on-going research into any such new products should become officially part of the long-term plan.
2. **EDUCATION:** A blatantly obvious omission is that the City of Seattle missed another opportunity - to include the Seattle Education System as a source of outreach and as a means of engaging the next generation, starting from a young age, in ecological and environmental issues. This misstep has been painfully clear to us, who live near the University of Washington and witness the disregard for environmental cleanliness by its students on a daily basis. It's as if they believe that someone will always pick up after them; and the Seattle Public Utilities Department is only too willing to oblige.
3. **ROOF-TOP GARDENS IN NEW DEVELOPMENTS:** This plan doesn't even mention the rapid increases in such gardens, including potted trees, which developers are now touting as major contributors to the city's tree canopy during their design reviews. These trees must not be that relevant, since they are not included in the City's inventory. Furthermore, they cannot even be appreciated from the sidewalk, as their limited existence is only an asset to the residents.
4. **PERIODIC ASSESSMENTS:** The only reviews that appear in the document are the periodic 5-year assessment of the citywide canopy cover and the climate change assessment. This is unacceptable, as it assumes that other aspects of the plan will not require any periodic review. The fact is this is an on-going problem with much legislation passed by the City Council.
5. **SELECTIVE INPUT:** While it is most appropriate that those who have been disenfranchised in the past should be given a prominent seat at the table, if the City truly

- wishes that this noble and worthy cause be embraced by all residents, then all residents should feel an integral part of the process.
6. **INTERDEPARTMENTAL/AGENCY PARTNERSHIP:** While this bold initiative is appropriately contained in the plan, past efforts toward such collaborations have not lived up to any stated expectations. Make meaningful changes to increase accountability, streamline any multi-department activities, and ensure that the focus is to advance the goals of the plan rather than to create an obstacle of uncontrolled bureaucratic red tape.
  7. **SOLUTIONS TO CRIME:** A UW study shows that trees positively reduce crime rates (page 3) Hence the following statement in the plan: *“Concerns about crime in the downtown core have also highlighted the need to design public landscapes that are safe and inviting by ensuring that trees allow clear sightlines and do not create dark areas.”* This is really your solution to the rise in crime?
  8. **UNRESOLVED ISSUE OF POPULATION DENSITY:** *“The study provided analysis for canopy cover levels based on two races and social just factors... and found that in census tracts with lower amounts of tree canopy more of the population tends to be residents of color and people who have lower than average incomes. This outcome is likely due at least in part to the fact that these areas tend to be areas with lots of apartments rather than detached homes with yards.”* (page 10)
    - a. What is the solution to this problem, other than more apartments and less trees? While the plan does acknowledge this conundrum, a conflict between addressing population growth while still improving the quality of life in the most impacted communities, it doesn't state how this issue will be addressed and resolved through changes in zoning and building code.
    - b. Shouldn't the city revise its code regarding trees so as to reflect a specific ratio of trees per resident in each development, in order to significantly increase the number of trees in highly dense areas, whether or not they are in underprivileged areas? This would encourage a greater concentration of trees where they are most needed rather than relying on the city-wide two-for-one replacement policy. For instance, when a single-family house with two trees is replaced by an apartment building of ten or more units, adding two trees seems quite inadequate.
    - c. The assumption that increased density issues are isolated to the underserved BIPOC neighborhoods puzzlement. Up-zones and other such legislation, which promote rapid increases in density without concurrent increases in trees, impact not just the underserved neighborhoods. Just observe the lack of trees along 11<sup>th</sup> Ave NE in the U district due to the rapid rise of bulky, multi-unit apartment complexes.
  9. **THE NEW “NORMAL” NOT ADDRESSED:** If Covid19 taught us anything, it is that we cannot continue relying on the assumptions which were the basis of Seattle 2035, *“a 20 year vision and roadmap for Seattle's future, specifically: “Seattle is expected to grow by 70,000 new households and 110,000 new jobs from 2015 and 2035”* (pages 15 & 20):
    - a. People have become more mobile and even nomadic, as their lives transition into being centered around the home. In a way, this is a greater source of upheaval than expected; there may no longer be any long-term commitment to individual neighborhoods and communities, as people uproot their families based on many factors – jobs, schools, tax concerns, etc. Seattle cannot assume that it will remain a major magnet for jobs and residents when predicting sources of tax revenue, investing in various communities, and making zoning and code changes.
    - b. Changing lifestyles and needs demand a proactive response by the City in order to influence future legislation, codes and zoning. These changes now create a challenge to Seattle and its efforts to add bulk and density to the detriment of healthy and safe living. No longer can the Planning Department push for cubical style housing units on the assumption that people just need a place to eat and sleep. Now that life at

home includes working from home, studying from home, and entertaining from home, even community areas within multi-unit apartment units cannot provide practical options for the residents, especially if people find themselves shut down again by forces outside of their control. The old-fashioned yard is soon to become the new source of freedom and security.

- c. This new reality must be recognized as a challenge to the assumptions of population growth trends now built into our various city-wide planning tools: up-zones, ADU/DADU ordinances, tax legislation as a source of income for city obligations and improvement projects, etc. Seattle must pivot to addressing population movements in more detail, including trends in and out of various neighborhoods as well as in and out of the City, and drifts into the suburbs: What types of individuals and families are migrating, to and from where, what they are seeking, and for what incentives?

### Feedback regarding the survey:

While the City provided an on-line survey regarding the Draft Plan, we felt obligated to submit this letter, because the survey has several flaws:

1. The list of eighteen (18) actions was too complicated and disorganized to prioritize 1 through 18. Simply organizing the list as it was presented in the actual document, and referring to those pages for greater detail, would have provided valuable guidance. By the way, in order to complete the online survey, we screenshot the list, so that we could work with a paper copy, only to discover, when we returned to the survey, that the items on the list were completely reorganized again! Is the city really interested in our feedback or only in how well we can navigate the survey?
2. The survey was limited to those actions you deemed important, with a blank box in which to share our concerns. This places too much of a burden on those filling out the survey - to itemize the many issues they have with the document.
3. The fact is, some residents in our neighborhood simply gave up on the survey.

We recognize that this entire endeavor is of monumental proportions, involving many outreach efforts and input from experts, including an extensive review of data. We further appreciate the opportunity to participate in the process and to provide our own ideas and feedback. Remember that our City is a marvelous mosaic of many cultures, histories, and values. If you truly want the residents to become engaged in the fulfillment of this plan's aspirations, they must believe that its goals are all encompassing and inclusive. That is the only path to ultimate success. Also, the City cannot afford to rest now, with the attitude that this was a job "well done"; the plan must include official and periodic, honest, reflective and proactive reviews and assessments within its formal structure. No plan is worth the time consumed in its creation if it is not flexible enough to change as situations change and as accumulated data challenge given assumptions.

Please accept our feedback and reflect upon its contents with an open mind, as you finalize a document which is sure to direct the entire City of Seattle onto a new trajectory into the future.

With sincerest gratefulness,

Aileen M. Langhans  
On behalf of the Langhans Ladies: Aileen M. Langhans  
206-522-0203; [aileenmargaret@yahoo.com](mailto:aileenmargaret@yahoo.com)

CC: Council Member Alex Pedersen, District 4  
Mayor Jenny Durkan

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**From:** kevinorme <[kevinorme@protonmail.com](mailto:kevinorme@protonmail.com)>

**Sent:** Monday, November 30, 2020 4:36 PM

**To:** LEG\_CouncilMembers <[council@seattle.gov](mailto:council@seattle.gov)>; Durkan, Jenny <[Jenny.Durkan@seattle.gov](mailto:Jenny.Durkan@seattle.gov)>; Pinto Urrutia, Sandra <[Sandra.PintoUrrutia@seattle.gov](mailto:Sandra.PintoUrrutia@seattle.gov)>; DOT\_SeattleTrees <[Seattle.Trees@seattle.gov](mailto:Seattle.Trees@seattle.gov)>

**Cc:** Brazier, Maketa <[Maketa.Brazier@seattle.gov](mailto:Maketa.Brazier@seattle.gov)>; Pinto Urrutia, Sandra <[Sandra.PintoUrrutia@seattle.gov](mailto:Sandra.PintoUrrutia@seattle.gov)>

**Subject:** Comments for Draft Seattle Urban Forest Management Plan

**CAUTION: External Email**

hello and thanks for considering my comments to the Draft Seattle Urban Forest Mgmt Plan - PDF attached. I will fill out and submit the online survey separately right now too.

Kevin Orme  
Greenwood

Comments, feedback and suggested changes to Urban Forest Management Plan, 11/29/20  
– Kevin Orme, Greenwood 98103

Thanks for the opportunity to comment on this plan – I hope that the direct approach seen below is best- the order of the comments tracks the same order of the document PDF supplied by the City, seen here:

[http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/2020/2020docs/UFMPv11\\_100620.pdf](http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/2020/2020docs/UFMPv11_100620.pdf)

1) First and foremost - there are **no timeline derived goals anywhere in this plan?** The '30% by 2037' has been changed more than once in the past, and has been around for quite a while already - **nothing else is tied to a timeline or progress** (incremental, quarterly/annual, or otherwise). Everything is either vague outcomes or 'agenda' items but while responsibility is named to a 'lead' - no one is assigned a timeline?

2) Second, until you designate OSE or some City agency \*other\* than DCI as ultimately in charge - **nothing will get done.** – I hate to say this, history since the 2009 Interim Ordinance has already proven this to be true.

No matter who in the past has put things in motion (SUFC, City Council, Mayor Burgess, etc.) DCI still effectively vetoes everything under the table or without true visibility into why or how?

The most obvious example is how they've had a mandate **\*\*since 2009\*\*** to be tracking tree loss and still have not done this, nor do they enforce the rules (consistently or often, at all) as regards preventing private property exceptional tree loss?

This is easily rectified, however – the City Council has the power to control all the agencies and set the final decision too – even within a Council subcommittee if need be, rather than relying on an agency with an inherent conflict of interest (but more on this below). This needs to be rectified in this plan, period, to have any true chance of success in protecting and enhancing Seattle's urban tree canopy.

3) suggested update to this intro paragraph, page 4:

existing:

**What is the urban forest?**

Seattle's urban forest consists of the trees and associated understory plants, as well as ecosystem services that they provide. The urban forest extends across public property, private property, and the rights-of-way including parks and natural areas, as well as the trees along streets and in yards.

suggested revision (updates in bold + italic):

**What is the urban forest?**

Seattle's urban forest consists of the trees and associated understory plants, as well as ecosystem services that they provide, *with special attention to protecting native, large Pacific Northwest conifers and deciduous species that are essential to the citywide health and ongoing survival of this forest.* The urban forest extends across public property, private property, and the rights-of-way including parks and natural areas, as well as the trees along streets and in yards. *In Seattle's specific case, the overwhelming majority of its urban forest lies on private property citywide, meaning a public/city partnership is crucial to the urban forests' continued survival and growth long term.*

4) suggested revision to page 5 'purpose' statement:

existing:

**Purpose of the plan**

The 2020 Urban Forest Management Plan (UFMP) provides a framework for policy and action that guides city government decisionmaking to help Seattle maintain, preserve, enhance, and restore its urban forest. The core of the plan is a set of goals, strategies, actions, and indicators that will support a healthy and sustainable urban forest across Seattle's publicly and privately owned land.

suggested new version (updates bold + italic, some removals indicated in ~~strikeout~~):

**Purpose of the plan**

The 2020 Urban Forest Management Plan (UFMP) provides a framework, *timelines and accountable agencies/city entities* for policy and action that guides city government decisionmaking to *help require* Seattle *maintains, preserves, enhances, and restores* its urban forest. The core of the plan is a set of goals, strategies, actions, and indicators *tied to incremental timelines and those responsible for them* that ~~will support~~ *results in* a healthy and sustainable urban forest across Seattle's publicly and privately owned land *according to the timelines outlined in the plan.*

5) page 6 - 'importance of urban trees'

Here, there should be at least **one or more cites/external links for every paragraph** in this page providing more information to back up and bolster the statements made here. There are two cites already here but that's simply not enough. We, the advocates of Seattle's urban forest, would be more than happy to help provide more of the research that backs up each of these claims and demonstrates the ever-increasing importance of protecting, now, before any more is lost!

Moreover, in past Director's Rules from DCI, the importance of trees content spanned up to five pages, now it's only one condensed version on one page? Where is the rest of the content? Surely the importance didn't change – it's only become **more important!**

6) page 7 - 'Seattle's relationship to trees'

I would put the statement in the '1851' section that says "Over the next 100 years, the forest will be clear-cut except for small areas such as parts of Seward Park and Schmidt Park." **in bold**. I would also add that in typical development schemes seen every day throughout the City of Seattle – these smaller-scale clearcuts are **still going on**, you just need to pay closer attention (and address the problem)!

7) page 8-9 regarding the city's Equity and Environment initiative and outcomes

These two pages are far too vague, despite the positive policy statements made here – like mentioned above in (5) – there should be active links/cites to external documents backing up these claims and offering further support.

Also these communities must have provided feedback earlier to help develop these policy statements – where and how can we see that content and their specifics? This is **a very important component – the urban forest is for us all** – and needs to be taken seriously in that regard as to disadvantaged community input now more than ever!

8) page 10 - 'Seattle's urban forest today'

a) Unfortunately, that cite of 'four million trees' is **over 8 years old and cannot be relied on at this point**. By using this potentially invalid data, you are essentially making the point that DCI's lack of tracking tree loss (which is actually required by the 2009 Interim Ordinance, btw) isn't important and we can simply use 'last best data' - even if it's over 8 years old and no longer accurate.

By way of comparison, SDOT tracks their inventory of street and public trees and keeps the data current – the moment they finish the overall inventory, they simply restart the data collection all over again – and **this is how it should be**.

But, as noted above (and as everyone involved in this issue knows) – **the overwhelming majority of trees in Seattle are on private land – so we cannot rely on 8+ year old data and speak with any degree of accuracy on this issue**.

b) the statement "It is estimated that the replacement value of Seattle's existing urban forest (the cost to re-plant trees and nurture them to their current size) is close to \$5 billion dollars." - may be true – although this is also 8+ years out of date – but the cost of **not** doing it is far, far more.

We cannot expect to 'replace' the ecosystem, habitat and public benefits of the urban forest through 'technology', plain and simple and we should not keep pretending otherwise. Nor is the City (or DCI) putting in the budget or required effort to do that tree-planting they pay lip service to in any event either.

9) Page 11 - 'urban forest management units' - a key failure of this plan (and efforts to date) is the failure to protect private trees from DCI and property development. **Creating a permitting system** like that mentioned on this page already in use by SDOT would be a notable step to rectifying that, and it would also represent a **notable step towards tracking tree loss** which DCI does not do now. This in turn would provide supplementary (and far more current) data than the 8+ year old data mentioned in (8) immediately above?

10) page 12 - 'canopy cover and assessment' - LIDAR is not the be-all/end-all of accurate mapping of the Seattle urban forest. There needs to be an inventory and tracking/mgmt system akin to that of SDOT already being used. We have been saying this for years! Here is a more recent review of LIDAR/companion methods that should be updated into the next Seattle assessment, and a second article that calls out LIDAR limitations - **but implement a city-wide, private and parks tree inventory system first**. We would also **strongly recommend including these experts** (two of which live in Seattle) **from the third study linked below** in any LIDAR-involved work in the future:

Definition and measurement of tree cover: A comparative analysis of field-, lidar- and landsat-based tree cover estimations in the Sierra national forests, USA -

<https://www.sciencedirect.com/science/article/abs/pii/S0168192319300255>

What is LiDAR? <https://www.forestresearch.gov.uk/services/woodland-heritage/woodland-heritage-light-detection-and-ranging-lidar-surveys/lidar-surveying-and-mapping-historic-environment/what-lidar/#limitation>

#### INDIVIDUAL TREE SPECIES IDENTIFICATION USING LIDAR INTENSITY DATA

<https://www.asprs.org/a/publications/proceedings/portland08/0043.pdf>

Finally, there is an active and open question as to what 'levels' the LIDAR studies represent when assessed for the City of Seattle. That is, if you do the scans at say, 9 feet – you are including hedges, yard vegetation and other forms of plant life that otherwise do not qualify as 'tree canopy'. By the same token, if you did the scans at 140ft high – you would omit large deciduous trees such as Big Leaf Maples and only take into account large conifers such as Cedars and Doug Firs where they reach such heights. There needs to be far more careful and deliberative consideration and accuracy if LIDAR is a key factor in evaluating the City's tree canopy moving forward (likely).

11) page 14 "other assessment efforts"

- The street tree inventory underway by SDOT needs additional funding and budget support to **speed it up**;
- there needs to be a citywide, private tree inventory begun **now** and overseen by OSE, **not DCI**
- that 2012 study is now 8 years+ old and no longer current as already mentioned. **Update needed.**

12) page 15 'challenges to the urban forest' - Unfortunately here, you have every other possible 'challenge' listed before (finally, 3+ pages later) you get to the real, true challenge – **urban development**.

Simply stated, **that is the single biggest challenge and should be listed first and foremost**, – because

- a) most Seattle trees are on private land;
- b) DCI doesn't do nearly any enforcement of the current 2009 Interim Tree Ordinance; and because
- c) DCI is funded (literally) by development permits so has a fundamental conflict of interest in doing otherwise than the status quo.

Second comment (page 17) - 'views' - Anyone who has attended law school can tell you – there is **no legal right to a 'view' - none**. This claim at best is retroactive justification for Marty Riemer-style illegal clearcutting, nothing more.

Third comment – (page 17) – sidewalk damage is due to poor planning, don't blame the trees!

Fourth comment - Despite solar incentives and clean energy (a net positive) – that emerging market and practice can hardly be blamed for clearcutting trees to **any** similar degree as to irresponsible lack of oversight by DCI and the housing development industry in Seattle.

Finally, (page 17) - 'freight mobility'? Really? You are going to cite the need to maintain existing streets as the fault of the Seattle Urban Canopy?

13) pages 20-22 - 'existing management approach' - see comments already made about:

- lack of accountability in one agency/City entity – if 'everyone' is in charge – 'no one' is in charge;
- the agency with veto power over all others (DCI) has an inherent conflict of interest and its reason to exist is anti-environment, plain and simple;
- **again, 'distributing responsibility' with no timelines nor 'the buck stops here' accountability ensures nothing (still) will be done**, much like the last 11+ years since the 2009 Interim Ordinance plan was created.

14) Trees for Seattle (cited throughout the doc and specifically on page 25) – **does great work but has no ability to enforce what needs to be done and no say in policymaking when push comes to shove**. Outreach and tree-planting programs are great but if DCI continues to rule the roost, nothing will change.

15) The **Seattle Heritage Tree Program** (page 26) – is great and should be far more actively encouraged and promoted. But how many Heritage Trees have been registered in the past 5 years? Have any? This needs a strong boost to build awareness and the registry of Seattle Heritage Trees, period.

16) page 31 - 'goals and strategies' - see first comment about accountability, transparency, actual deadlines and enforcement. My point still stands – this is still mostly vague platitudes, unfortunately.

17) page 33-36 - 'action agenda' - see first comment – same point, still valid and still (besides removing DCI from the position of ultimate decisionmaker) the crux of the whole matter.

18) page 37 – 'key performance indicators' - same comment as first comment – without incremental deadlines, accountability/responsibility by city agency/city entity – these are all platitudes at best, at worst the same points we'll be discussing 10 years from now for the same reasons (only there will be even less trees and more development clearcuts by then that you still aren't taking seriously).

19) page 38 - 'future research needs' -

a) why does Seattle have to do all the work (and sadly in practice, ultimately use that as an excuse for 'more studies')?

b) why can't we leverage the multitude of private and public resources already here (UW, WSU forestry, other entities such as Forest Credits and similar) as well as what other cities have done, so we can act faster, more accurately and more effectively?

There is already plenty out there to address the points made here, why aren't we using it?

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**From:** MartinWesterman <artartart@seanet.com>

**Sent:** Monday, November 30, 2020 5:06 PM

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

**Cc:** Michael Oxman <michaeloxman@comcast.net>; Steve Zemke <stevezemke@msn.com>; Elaine Ike <elaineike@hotmail.com>; Mary Fleck <maryfleckws@gmail.com>; Peggy Sturdivant <peggysturdivant@gmail.com>; David Moehring <dmoehring@consultant.com>; Annie Thoe <neighborhoodtreekeepers@gmail.com>

**Subject:** SGSC comments: Draft Urban Forest Management Plan

**CAUTION: External Email**

Hi Sandra,

Here are SGSC's comments on the draft:

The phrase we want to see in all zoning and development-related legislation is this:

"Whereas, Seattle's open and green spaces are a tangible asset essential to public health, urban resilience, equity and sustainability,  
Therefore the City of Seattle will integrate development within this context, to meet the needs of communities, neighborhoods, and the entire city."

So far, the City Council has rejected.

All the best,  
Martin Westerman, Co-director  
[Seattle Green Spaces Coalition](#)



SEATTLE GREEN SPACES COALITION  
[www.seattlegreenspacescoalition.org](http://www.seattlegreenspacescoalition.org)

Urban Forestry Commission  
City of Seattle  
Seattle, Washington 98104

November 30, 2020

Re: SGSC comments on Seattle's draft 2020 Urban Forest Management Plan

To whom it may concern:

The SGSC files these public comments on Seattle's draft 2020 Urban Forest Management Plan. The draft raises issues that concern us, including:

1) Where the 2007 UFMP required using scientific data for making management decisions, this draft doesn't. It fails to pair aerial photography with on-the-ground assessments, which would provide:

a) a true picture of forest constituents and health on the ground. By emphasizing location of trees shown by photogrammetric data, the draft only provides tree managers with quantitative data, not the qualitative data they need,

b) baseline counts that show objective, rather than subjective assessments, and metrics for viewing progress towards goals recommended by the city auditor. However,

i) No department-wide urban forestry budget request has ever been submitted by the Mayor to the Council for funding, and

ii) the 2018 Davey Resource Group report showed upper managers facing low budgets prevented effective forest cultivation,

c) economy and transparency in database management, rather than wasted staff efforts, with records kept from citizens, or released with redactions,

d) priority on assessing viability of individual trees' health, structures and conservation in their present locations.

2) The UFMP Survey Monkey form biases equity concerns over environmental ones.

3) Seattle's 2037 Comp Plan does not contain short term goals or metrics,

a) Seattle's original Comp Plan goal required a 1% increase in canopy cover each year. It has been repeatedly diluted – first to a 'net increase in canopy cover', then to a five-year UFMP update, and now to no requirement at all,

b) the UFMP draft does not prioritize contiguous wildlife and pollinator corridor enhancement through arrangements of neighborhood groves, that would benefit all residents, regardless of locale, ethnic or economic status

4) The draft UFMP assumes that developer profit should be the highest and best land use, not balancing development with forest ecosystem health and integrity,

a) In 2009, when the Urban Forestry Commission was appointed, the city decided to give it advisory, not regulatory powers. Since then, the UFC has produced more than a hundred white papers with specific recommendations, including revising Seattle's tree ordinance. Successive Seattle administrations have failed to update the tree ordinance, and ignored or discounted UFC recommendations in zoning and building regulations,

b) Urban Forestry staff meetings should be subject to the Washington Public Meetings law, with open agendas, minutes, and attendance,

c) The auditor recommended a single authority to improve coordination between departments, yet no leader has been appointed,

d) Several citizens made a 2019 public disclosure request for the city to list all urban forestry expenses. The City replied that the entire \$6 billion dollar city budget is posted on the website, and the citizens should find the numbers on their own – a violation of the Public Records Law. We still want to know what the City spends on staff and equipment for urban forestry, according to department and individual staff job descriptions.

We look forward to seeing improvements made in the draft UFMP.

Sincerely,

Elaine Ike, Mary Fleck, Martin Westerman,  
Co-founders & Director, for the Board  
[Seattle Green Spaces Coalition](#)

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**From:** Janet Way <janetway@yahoo.com>  
**Sent:** Monday, November 30, 2020 9:04 PM  
**To:** LEG\_CouncilMembers <council@seattle.gov>; Durkan, Jenny <Jenny.Durkan@seattle.gov>; Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>; DOT\_SeattleTrees <Seattle.Trees@seattle.gov>  
**Cc:** Brazier, Maketa <Maketa.Brazier@seattle.gov>; Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>  
**Subject:** Subject: Comments on Draft Seattle Urban Forestry Management Plan

**CAUTION: External Email**

Dear Mayor Durkan , Seattle City Council, and Ms Pinto Urratia:

Please accept my comments on the Draft Seattle Urban Forestry Management Plan. (below and attached.)

Thank you.

Janet Way

11/29/20

**Subject: Comments on Draft Seattle Urban Forestry Management Plan**

To Whom It May Concern:

Please accept my comments on the Draft Urban Forestry Plan.

The Emerald City is rapidly losing its verdant color because of the mistaken belief that every tree is expendable and that density is the answer to every problem.

I urge Seattle to strengthen this plan and make tree protection a Seattle Value.

I would recommend that Seattle study the Lake Forest Park tree ordinances and Urban Forestry Plans. While obviously that is a much smaller city, they have done a great deal to preserve existing forest and have an effective permitting system that provides mechanisms to promote tree protection and replacement tree planting. Even Shoreline has a “fee In Lieu” system for when a tree must be cut which has recently allowed for a substantial number of trees to be planted.

These are the most important priorities for improving this Draft Urban Forest Management Plan:

- Preserve existing trees. Because it takes decades for most trees to reach their ultimate size, trees already growing in Seattle generally provide immediate and ongoing benefits that cannot be matched by small/younger placement trees. ...Focus especially on Evergreen Trees...Mid-large trees...Forests, woodlands and tree groves...Unique wildlife habitat.
- Maintain existing trees
- Habitat restoration and maintenance
- Plant new trees to replace those that have been cut
- Increase awareness of the value and proper care of trees.

**Urban Forest and Climate Change Links -**

Direct links to Climate Change must be made when assessing the value of preserving Seattle’s Urban Forest. This link must be strongly emphasized in this management plan.

One of the clearest most obvious tools we have against Climate Change is protecting existing forests..

**Environmental Justice and Climate Change –**

How does the decimation of the Urban Forest through systematic loss of mature tree cover impact communities of color or economically distressed Seattle communities? And how does Urban Forest reduction impacts on Climate Change affect poor people and their children? These impacts should be studied and included in the Urban Forest Management Plan.

Permitting decisions that leave cutting of mature trees to a cookie cutter approach by developers are irresponsible. Increased urban development does not have to require all trees to be cut. Deploying a

creative approach for town home development and even larger scale development could include design options that preserve many existing trees for an attractive and healthy outcome for future residents and existing residents living nearby.

Protecting mature conifers has a proven benefit of shade and air quality. There have been studies published in recent years that show links from reductions of lead from automobiles to reductions in crime rates. The theory being that the pollution which plagued California over the last century such as lead pollution actually contributed to higher crime rates because of the impacts of lead on brain development in those regions. Similarly, other pollutants which are still present, such as smoke from summer fires could contribute to health problems in urban areas. This is not a stretch. Asthma is another huge concern in poor communities and the Urban Forest is one of our best tools to clean the air.

### **Urban Forest and Links to Water and Air Quality –**

What a lot of people even in the City government don't realize is that Seattle is still Salmon Habitat. Several major stream systems, the largest being Thornton Creek flow through Seattle. And, of course Salmon habitat surrounds the City in both Lake Washington and Puget Sound and flows right through in the Ship Canal and Locks linking them both and the route to other important salmon stream systems beyond. Under law, Seattle is required to protect and restore salmon ecosystems. Urban Forests are one of the most important tools we have to protect our streams and water quality. Trees shade these creek edges and filter storm water that flows into them.

The Urban Forest Management Plan should emphasize the links of trees to salmonid ecosystems and the City's obligation to protect these elements together.

### **Urban Forest as a Shield Against Heat Island Effect**

It has long been understood that the Heat Island Effect is a dangerous phenomenon that is only getting worse with each succeeding year. Protecting our existing trees and replacing those we've lost is a no-brainer. And it should be addressed seriously in the Urban Forestry Management Plan.

The EPA has a web page that strongly advocates for protecting trees to reduce the dangerous Heat Island effect which is a health hazard to humans and animals and exacerbates Climate Change.

<https://www.epa.gov/heatislands/using-trees-and-vegetation-reduce-heat-islands>

“Trees and vegetation lower surface and air temperatures by providing shade and through evapotranspiration. Shaded surfaces, for example, may be 20–45°F (11–25°C) cooler than the peak temperatures of unshaded materials.<sup>1</sup> Evapotranspiration, alone or in combination with shading, can help reduce peak summer temperatures by 2–9°F (1–5°C).<sup>2,3</sup>

Trees and vegetation are most useful as a mitigation strategy when planted in strategic locations around buildings or to shade pavement in parking lots and on streets. Researchers have found that planting deciduous trees or vines to the west is typically most effective for cooling a building, especially if they shade windows and part of the building's roof.”

Protecting our Urban Forest would be a cost-effective solution to combatting this Heat Island Effect problem.

### **Cumulative Impacts –**

A cumulative impacts of assessment of the services lost from allowing up to, 4000 mature trees to be cut each year in Seattle should be conducted. The impacts studied should be linked to development that causes these thousands of trees to be lost. And conversely what benefits could be gained by preserving them.

### **Urban Forests in Parks**

The tragic devastation that is occurring in Seattle's Parks and Open Space cannot be missed in a discussion of an Urban Forestry Management Plan. It will be impossible to manage our beautiful forest if then are under heavy use and abuse because of homeless encampments. Legally, camping is not permitted, but clearly these laws are being ignored because of concerns about homeless people who seem to think these parks are there for the purpose of camping. These encampments are ironically usually erected right under large trees. Some of these trees are being damaged.

But the primary concern is that it is impossible to care for these forests as long as they are being used as unregulated campsites. There are many pollution problems resulting. And other impacts to the forests. These homeless encampments must be addressed in order to preserve these valuable open spaces for everyone.

In conclusion, I urge Seattle to strengthen this Urban Forestry Management Plan and implement it forthwith. It is urgently needed to preserve what's left of the Emerald City.

Respectfully Submitted,

Janet Way

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**From:** RICHARD ELLISON <climbwall@msn.com>  
**Sent:** Monday, November 30, 2020 11:49 PM  
**To:** LEG\_CouncilMembers <council@seattle.gov>; Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>; Thaler, Toby <Toby.Thaler@seattle.gov>  
**Subject:** Comments to the 2020 Urban Forest Management Plan (UFMP)

**CAUTION: External Email**

**Attached as a PDF is the full report (intro below). I include it because the City has been kicking this urban forestry can down the road for over 20 years, and the problems are basically the same as the City refuses to really deal with the problem of saving trees and protecting the environment.**

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## **Summary of Stakeholder's Workshop**

**December 2, 2000 Seattle Central Community College**

### **A. Workshop Goals**

**A stakeholder's workshop, sponsored by the City's Office of Sustainability and Environment was held on Saturday, December 2 to bring together members of Seattle's urban forestry community (NGOs, community organizations, community councils and neighborhood groups) to obtain their input on the City's Strategic Plan for the Urban Forest. Specifically, the purpose of the stakeholders' workshop was to provide participants with an opportunity to comment on objectives developed earlier in the year by Seattle's Urban Forest Coalition (UFC, an interdepartmental team of City staff involved in urban forestry.)**

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**My new comments submitted today, Nov 20, 2020, are below**

### **Comments to the 2020 Urban Forest Management Plan (UFMP)**

**From: Richard Ellison, MS Plant Ecology, [climbwall@msn.com](mailto:climbwall@msn.com)**

"The 2020 Urban Forest Management Plan (UFMP) provides a framework for policy and action that guides city government decision making to help Seattle maintain, preserve, enhance, and restore its urban forest."

Seattle used to have an Urban Wildlife position that was central to finding ways to mitigate policy decisions and their effects on wildlife. It was eliminated in the 1980's in budget cuts. Is it time to elevate the importance of wildlife (and trees) in Seattle to "protect and serve" our wildlife and urban forest?

**WILDLIFE.** Pg 4 + 6 mention wildlife briefly : “Wildlife habitat. Urban trees provide terrestrial habitat for urban wildlife including bees, birds, mammals, and insects.” There is not much of a discussion of details how birds and wildlife are impacted by tree species losses, canopy cover losses, etc.

References show how the loss of Seattle’s native bird species diversity and number is correlated with loss of Seattle’s tree canopy, is detailed in a UW Phd thesis “**Avian responses to a gradient of urbanization in Seattle, Washington**”, by **Stephen Thomas Penland, 1984.** Things have likely only gotten worse since then, in regards to avian losses.

How the loss of native conifers impacts birds was studied at the UW Arboretum. This is another example of how birds are severely negatively impacted by canopy loss: “Can birds tell the difference between native and introduced conifers in the Arboretum?” **Washington Park Arboretum Bulletin** 54: 3, 7-9 by 1991 Boersma, P.D. and \*K.N. Almasi . Yes, some birds simply disappear from Seattle as their habitat is lost forever.

How can we better protect the WA State Bird Species of Concern or Candidate Species known to exist in Seattle? What of other species that nest and roost in native trees? Cavity nesting birds like the Piliated Woodpecker should allow for large DBH trees to be preserved, alive or as retained snags. This protection would allow other cavity nesters to also improve. What does the loss of these Exceptional trees mean to eagles, osprey, woodpeckers, etc?

Pg 6 Importance of urban trees – missing mention of soils and functions- intercept water, improve water quality of runoff. Trees slow down the rainwaters from reaching our overtaxed combined sewage system. How do trees improve the situation of the quantity and quality of precipitation runoff? Regarding impacts to salmon, how to quantify non-point pollution runoff increases from tree removal on a watershed basis. Would there a value in supporting a tree retention, storm water refund/impervious surface tax?

Pg 7 Timeline – missing- In 1997, the City Council protected the tallest Chinese Tree Privet in Washington State with a \$2500 bond, the first construction tree bond ever in Seattle. The City Council Urban Forest Work Group held meetings in 1997-2000 to find ways to protect the trees in Seattle.

Pg 15 Challenges to the urban forest. – Missing impacts of invasive vegetation threatening mature trees, understory recruitment, biodiversity, slope stability, habitat quality, etc.

A big challenge is the poor coordination with other state and federal jurisdictions (WDOT, Corps of Engineers), and within the different City departments, as well as UW, and the many public and private schools and colleges.

Examples of problems and needs:

WDOT: Heavy infestations of invasive vegetation in trees along highways including steep slope areas. The expansion of the 520 bridge in the UW Arboretum area shows many exceptional

trees removed and no snags retained for wildlife. Trees are treated as just “in the way.” Replanting sometimes is not proper mitigation when groves of trees are removed. A twig is not a tree.

Corps of Engineers: large canal trees being removed for “improvements” affecting roosts and nesting. How to better interact with Federal jurisdictions?

UW: official tree policies ignored in massive construction projects , Husky stadium parking, etc..

Private schools: Seattle Prep HS, Seattle Hebrew Academy – are examples of campuses with trees heavily overgrown with invasive vegetation, many on steep slopes. There is no maintenance of these areas.

Public schools : Ingraham HS’s removal a large grove of trees resulting in communities filing litigations.

City of Seattle “Orphaned” steep slopes along Westlake, Highway 99, Lake City Way, are examples of steep slopes with many exceptional trees and groves choked with invasive vegetation threatening both trees and slope stability.

DCI- variances: Give aways: with many exceptional tree removals and grove removals reducing Seattle’s tree canopy in many neighborhoods.

Seattle City Light: overpruning, tree removal controversies are common.

Seattle Parks: Promises of snag preservation by Seattle Parks results in losses of both tree canopy and cavity nesting habitat. For example, back when Mark Mead was in charge of Parks forest programs, Interlaken Park when a group of 40” DBH cottonwoods were removed but no retention.

Seattle Port Commission. Many trees and groves are removed for airport activities. Are they all necessary or is it overkill? Dealing with aviation safety sometimes can be overzealous, and who is measuring the gains and losses?

Natural capital assessment?

Pg 18 - Development and urban design. Accommodating trees in urban areas pose additional issues. – missing discussion of building taller to maximize on ground open space allowing for mature trees and play space.

Pg 19 – Invasive plants. It does not discuss economic effects of invasives, such as threats to habitats, steep slopes failing when saturated, or large broken branches overloaded with vines falling on roads in storms. It does not map areas where invasives threaten either slope stability of steep slopes (like along Westlake and Lake City Way for example). Are these private property or public? These steep slopes have been abandoned for decades, and are found throughout our city. Some of the wealthiest communities in Seattle (Capital Hill for example) still neglect their backyards, not knowing, not caring, not realizing how easy it might be to hire crews to begin the restoration of these areas. Homeowner might be happy to donate monies if only they knew of

the problem and possible solutions. Private properties, schools, churches, highways, etc with steep slopes are the remnants of the urban forest, neglected because of the difficulties to allow development.

Now these are our last treasured groves and they are under threat. Communities with lack of funds might need more financial assistance. Where could the funding come from? The City must adopt a Tree Ordinance with fees and fines, and charge developers fees to help maintain the urban forest infrastructure.

Pg 20 Chapter 3: Existing management approach – missing a discussion of delays to update Tree Protection ordinance, and the impacts to tree canopy.

The City has been “kicking the can” for decades on supporting and defending the urban forest. Below is attached a December 2000 City “investigation” into the urban forest. We keep trying to ignore the problem by discussing it to death and not doing enough to protect our urban forest resource.

“A stakeholder’s workshop, sponsored by the City’s Office of Sustainability and Environment was held on Saturday, December 2 to bring together members of Seattle’s urban forestry community (NGOs, community organizations, community councils and neighborhood groups) to obtain their input on the City’s Strategic Plan for the Urban Forest. “

Pg 25 – Existing Programs – No mention of the Seattle Urban Forest Commission efforts since 2009.

Pg 26 – Green Seattle Partnership – No mention of the invasive problem on private properties, both adjacent to City properties and separate. Missed opportunities to educate community members how to control invasives, options to hire crews or create volunteer neighborhood control groups, and the risks of neglecting controls.

Pg 27 - Management of public and street trees. Missing a discussion of the decline or death of many newly planted trees due to lack of watering in Parks and ROW’s.

Pg 31 - UFMP goals – Preserve History - Many trees have a human history that were planted for special events, like the International Peace Trees.

Pg 32 - UFMP strategies – No mention of preserving and enhancing wildlife habitats, especially examples like heron rookeries, etc.

Pg 33 - Chapter 5: Action agenda – No mention of supporting native wildlife (birds), their habitat needs, flyways

Pg 34 Action Agenda- Environmental Justice – missing is any discussion of the needs for focusing on open space for children, families, and retired people concurrent with the loss of open space for both affordable housing and denser housing. Lack of play yards and open space in new development projects leads to lower quality of life in a denser, urban island heat affected city.

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

**Sent:** Monday, November 30, 2020 6:35 PM

**To:** Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>; Torgelson, Nathan <Nathan.Torgelson@seattle.gov>

**Cc:** David Moehring <moehringconsultant@gmail.com>; Stuart Niven <panorarbor@gmail.com>; Kevin Orme <ovaltinelatte@hotmail.com>; Steve Zemke (stevezemke@msn.com) <stevezemke@msn.com>; David Moehring <dmoehring@consultant.com>; heidi calyxsite.com <heidi@calyxsite.com>

**Subject:** RE: Comments on Urban Forestry Management Plan

**CAUTION: External Email**

Thank you Sandra.

### **Implications Beyond the “Tree” agencies**

The UFMP has very important implications for air quality/health; stormwater; habitat; climate change and green infrastructure. In some cases, the interdepartmental team that addresses the urban forest does not include organizations like the Puget Sound Clean Air Agency, other parts of SPU (like all the folks I work with on stormwater), the American Lung Association or the Department of Neighborhoods.

The silos between the “tree” agencies and SDCI, the Dept of Community Development, the Dept of Neighborhoods, OSE, the Chamber network and classic natural resource agencies almost always means that trees lose. The DADU/ADU new laws are a perfect example.

### **Need for a centralized and organizing theme based on values of biophilia**

In many ways, our tree failures are really connected with our inability to create a cohesive set of values and strategies that run like veins through a blue cheese, to protect our biological resources as a meta priority for the city and to have the backbone and political will to enforce the laws we have on the books.

Buildings have embodied carbon and are not carbon sinks- trees are; 6-packs create compacted soils and stormwater run off- room for trees would not; building without design and community focus has led to completely haphazard development which only appears to benefit those in the private building industry. Most of the trees being cut are for views, at the behest of developers and to build market rate housing. What’s happening on the south end is just criminal and completely at odds with our platitudes about race and equity.

### **The need for meaningful public engagement**

Based on what I read and hear in community blog posts and other posting boards, the residents who live here are frustrated beyond their ability to process their frustration. As an old friend said not long ago, it’s like engagement theatre- the results baked in the cake through back room deals and then aired with the citizens with minimal, if any changes to the policy or approach under consideration. Rather, we have elected officials pointing fingers at these residents, calling them names (YIMBYs) or well -intended NGOs calling people who value trees racist. It’s like being in grade school.

The tone and approach of the City must change... or maybe the hiring process and election results will force that change. We just cannot treat the city like a toilet.

The UFMP must address the entire city, not just parts of it. OSE also deserves to have more staff. A while ago we were engaged in a conversation about tree related staffing- that issue also needs to be addressed in any final plan.

Please make sure the comments in this email are also included in the public record associated with the UFMP and the Tree Ordinance we are still waiting for.

All the best,

Heidi Siegelbaum

Heidi Siegelbaum

[Heidi@calyxsite.com](mailto:Heidi@calyxsite.com)

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

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**From:** Julie Knight <jknightiwa@gmail.com>

**Sent:** Tuesday, December 1, 2020 10:18 AM

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

**Subject:** Urban Forest Mgmt Plan

**CAUTION: External Email**

Dear Ms Pinto Urrutia,

I would like to urge continued prioritization of preservation and growth of Seattle's tree canopy to better promote citizens physical and mental health. Please consider this request for the Urban Forest Management Plan: "**Update the City's Tree protection regulations**" and "**Focus tree planting in environmental equity priority communities**" as the top 1 and 2 priorities respectively.

Sincerely,

Julie Knight Iwayama

98107

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From: Susan Ward <barrettmw@msn.com>  
Sent: Tuesday, December 1, 2020 10:55 PM  
To: Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>  
Subject: Seattle Urban Forest Management Plan draft

CAUTION: External Email

Dear Sandra and City of Seattle,

I am sending this after the survey closed, because unfortunately I only saw notice of this survey a day after it closed. I wish it had been better publicized, and much earlier.

I think that while the consolidation of trees and canopy oversight, now proposed by the Council, to replace so many different entities having control over street trees, private property trees, trees under wires, park trees, etc., may be a good thing, we need to ensure protections sooner. I am concerned that SDCI is currently the department responsible for protecting trees- a conflict of interest that rarely, I believe, protects them from developers.

More emphasis should be given to preserving mature, large trees in neighborhoods. It takes decades to replace them, and all the benefits they provide.

I agree with the statements below from don'tclearcutseattle:

The draft Seattle 2020 Urban Forest Management Plan (UFMP) needs to be strengthened to more aggressively protect Seattle's existing trees and urban forest citywide. Resolution 31902 passed by the Seattle City Council in 2019 lists a series of regulations and actions to be considered on protecting trees, however many items are missing from the proposed UFMP. For example, the adoption of a fee-in-lieu if trees cannot be replaced on site, would help to provide needed funds to achieve Seattle's goal toward planting trees in low-income and low canopy neighborhoods. Portland, Oregon just amended their tree ordinance to charge a fee in lieu of \$450/inch for all trees removed by developers that are over 20 inches DSH. In 2018 when the fee-in-lieu applied to trees over 36 inches DSH, they collected some \$1.44 million for their Tree Removal and Replacement Fund.

The 2020 draft UFMP devotes only one page to the "importance of urban trees" while the 2013 Urban Forest Stewardship Plan devoted 5 pages. However, five pages are still devoted to "challenges" and "competing uses." Please devote more explanation to the benefits and documentation of the importance of urban trees as was done in the 2013 Plan.

The following Priority Actions listed in the 2013 Plan have been removed. They should be added back with their more detailed explanation.

- Preserve existing trees. Because it takes decades for most trees to reach their ultimate size, trees already growing in Seattle generally provide immediate and ongoing benefits that cannot be matched by small/younger replacement trees. ...Focus especially on Evergreen Trees...Mid-large trees...Forests, woodlands and tree groves...Unique wildlife habitat.
- Maintain existing trees
- Habitat restoration and maintenance
- Plant new trees
- Increase awareness of the value and proper care of trees.

Eighteen Action items are mentioned in the current (2020 UFSP) draft. One of the most important items is listed last and is not bolded as a priority item. "Update the City's tree protection regulations." Seattle City Council Resolution 31902 specifically says, "Submit legislation in 2020 for consideration by the Council." The specific lack of emphasis on the need to update SMC 25.11, the City's Tree Protection Ordinance, is unfortunately consistent with the city's current 11 year delay in modernizing and updating the ordinance.

The proposed key metric tracking does not track tree removal. SDCI is not included in tracking tree replacement or tree loss in key activity metrics. As noted, SDCI's private property oversight covers some 72% of the trees in Seattle and should be the entity doing the most tracking of tree retention, loss, and replacement. They should do this by requiring permits to remove and replace trees as many other cities have been doing for years. All metrics should be tracked on a quarterly basis and publicly posted on the city website.

There needs to be more details around the push for increased housing density and construction in the city. Lots are literally being clear-cut across the city, removing trees not even in the proposed building footprint. Many trees are being lost, including large old trees that provide the most benefits to people living and working in the city. The city and this plan are not attaching a cost to this loss of trees and their benefits or looking for ways to both build and protect more trees. SDCI is not even willing to incorporate the phrase requiring developers "to maximize the retention of existing trees" in landscaping plans. Meanwhile Portland, OR in 2018 amended their tree ordinance to require permits to remove any tree outside the building development footprint to reduce the unnecessary loss of existing trees. Seattle should follow suit and also aggressively work with builders to develop alternative building design plans that could save more trees.

Inclusive community involvement is a vital part of the solution, but the same development pressures facing areas with lots of trees also affect all communities, including the BIPOC and low-income communities. As the 2013 Urban Forest Stewardship Plan noted, replanting of trees to compensate for large trees cut down will take decades to compensate for the benefits lost, no matter where they are planted in the city. The loss is even more significant to the traditionally underserved communities that have low tree canopy to start with.

Thank you,

Susan Ward

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**From:** Steve Zemke <stevezemke@msn.com>  
**Sent:** Wednesday, December 2, 2020 12:26 AM  
**To:** Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>  
**Subject:** Comments on draft Urban Forest Management Plan

**CAUTION: External Email**

Hi Sandra,

I am forwarding to you and the UFC my written comments on the draft Urban Forest Management Plan. Survey Monkey did not include links in my comments.

In particular I would like to bring attention to an article "[Google Tree Canopy Lab taps AI to help cities plan tree planting projects](#)". Venturebeat.com Nov 18, 2020

"Tree Canopy Lab aims to address some of the blocks by analyzing satellite images collected from planes during the spring, summer, and fall seasons. Pairing these with the data analysis capabilities of Google AI and Google Earth Engine, the tool pinpoints all trees in a city and measures their density. The imagery used for Tree Canopy Lab's calculations includes color photos that closely represent how a city might be seen from the sky. To extract even more information about a city's canopy cover, near-infrared photos reveal colors and details that human eyes can't see, comparing images from different angles to create a height map."

A second article also on this "[Google debuts an AI tool for tracking tree canopy coverage with LA](#)", ArchPaper.com Nov 2020

"Per Google, it plans to share data and insights gleaned from Tree Canopy Lab with "hundreds" of cities in the coming year while it continues to improve the technology based on the pilot roll-out in Los Angeles. City officials and planners who are looking to beautify and cool down their respective burgs are also encouraged to proactively reach out and get involved."

Comments by Steve Zemke for TreePAC.org on Seattle's draft 2020 Urban Forest Management Plan - Nov 30, 2020

The [draft Seattle 2020 Urban Forest Management Plan](#) (UFMP) needs to be strengthened to more aggressively protect Seattle's existing trees and urban forest citywide.

The first Seattle Urban Forest Management Plan in 2007 adopted a goal of 30% tree canopy cover by 2037 for Seattle. The [2016 Seattle Tree Canopy Assessment](#) has Seattle's tree canopy at 28%. But the 30% canopy goal is still set at 30% for 17 years from now. Meanwhile Tacoma in 2018 determined they had a 20% tree canopy cover and set a goal of getting to 30% by 2030. Seattle needs to adopt a more aggressive goal and join Tacoma in setting 2030 as their target date to reach 30% tree canopy.

While tree canopy cover is an important metric to track trees, the data collected should also include 3-D slices to get an idea of canopy volume changes as well as tracking loss of large trees which provide the most ecosystem services to the city. Periodic 5 year assessment of canopy is an important tracking metric.

The 2020 UFMP needs to update the statement that the "replacement value of Seattle's existing urban forest ... is close to \$5 billion dollars" to reflect current values. The figure of

\$4.99 billion dollars was from a [2012 Seattle's Forest Ecosystems Values report](#) when the tree canopy was estimated at 23% and is outdated. It would also greatly help to conduct a Natural Capital Assessment to get a better grasp on the ecosystem service value of the urban forest to the city.

The 2020 draft UFMP devotes only one page to the “importance of urban trees” while the [2013 Urban Forest Stewardship Plan](#) devoted 5 pages. However, five pages are devoted to “challenges” and “competing uses.” Please devote more explanation to the benefits and documentation of the importance of urban trees like was done in the 2013 Plan.

The following clear Priority Actions listed in the 2013 Plan have been removed. They should be added back with their more detailed explanation.

- Priority Action – “Preserve existing trees. Because it takes decades for most trees to reach their ultimate size, trees already growing in Seattle generally provide immediate and ongoing benefits that cannot be matched by small/younger placement trees.”  
...Focus especially on Evergreen Trees...Mid-large trees...Forests, woodlands and tree groves...Unique wildlife habitat. Priority Action -Maintain existing trees...
- Priority Action – “Restore...”
- Priority Action - Plant new trees...”
- Priority Action - Increase awareness of the value and proper care of trees.

Eighteen Action items are mentioned in the current draft. One of the most important items is listed last and is not bolded as a priority item. “Update the City’s tree protection regulations.” [Seattle City Council Resolution 31902](#) specifically says, “Submit legislation in 2020 for consideration by the Council.” The specific lack of emphasis on the need to update [SMC 25.11, the City’s Tree Protection Ordinance](#), is unfortunately consistent with the city’s current 11 year delay in modernizing and updating the ordinance.

Unlike many other cities, in Seattle

- no permits are required to remove most trees on private property,
- tree replacement by developers of exceptional trees and trees over 24 inches DBH even when required by law since 2001 are usually not replaced,
- no in lieu fee is in place if trees cannot be replaced on site; significant trees removed are not required to be replaced,
- maximizing retention of existing trees during development is not required,
- arborists are not required to be licensed and sign off on knowledge of tree regulations,
- a separate detailed tree inventory prior to any development is not required and the list goes on and on.

Resolution 31902 passed by the Seattle City Council in 2019 lists a series of regulations and actions to be considered on protecting trees, however a complete list is not in this Plan. For example, the adoption of an in-lieu fee if trees cannot be replaced on site, would help to

provide needed funds to plant trees in “low-income and low canopy neighborhoods.” As the 2016 City Canopy Study confirmed, in “Census tracts with lower counts of tree canopy more of the population tends to be people of color and lower income.” [Portland, Oregon just amended their tree ordinance](#) to charge a fee in lieu of \$450/inch for all trees removed by developers that are over 20 inches DSH. In 2018 when the fee in lieu was for trees over 36 inches DSH, they collected some \$1.44 million for their Tree Removal and Replacement Fund.

Key activity metrics conspicuously lack tracking tree removal and only note tree planting. All metrics should be tracked on a quarterly basis and publicly posted on the city website. SDCI is not included in tracking tree replacement (or tree loss) in key activity metrics, even though this is mentioned elsewhere as one of their key priorities. Since all trees are supposed to be on a site plan for development, the information of existing trees, trees removed, trees replaced, in lieu fees paid and the location where replacement trees were planted should all be tracked. As noted, SDCI’s private property oversight covers some 72% of the trees in Seattle and should be the entity doing the most tracking of tree retention, loss, and replacement, both during development and outside of development. They should do this by requiring permits to remove and replace trees as many other cities have been doing for years.

The elephant in the room, but not discussed in detail in the draft plan, is the push for increased housing density and construction in the city. Lots are literally being clearcut across the city. Many trees are being lost, including large old trees that provide the most benefits to people living and working in the city. The city and this plan are not attaching a cost to this loss of trees and their benefits or looking for ways to both build and protect more trees. SDCI is not even willing to incorporate the phrase requiring developers “to maximize the retention of existing trees” in landscaping plans. Meanwhile Portland, OR in 2018 amended their tree ordinance to require permits to remove any tree outside the building development footprint to reduce the unnecessary loss of existing trees. Seattle should follow suit and also aggressively work with builders to develop alternative building design plans that could save more trees.

It is a long overdue priority to address the race and social justice and environmental inequities occurring in communities of color and lower income communities. Inclusive community involvement is a vital part of the solution, but the same development pressures facing areas with lots of trees also affect these communities. As the 2013 Urban Forest Stewardship Plan noted, replanting of trees to compensate for large trees cut down will take decades to compensate for the benefits lost, no matter where they are planted in the city. The loss is even more significant to the communities that have low tree canopy to start with.

I find the list of 18 items a very selective list that has some very leading statements that don’t present alternatives to the items mentioned. A better way to select priorities is to provide a list of 50 or 75 possible action items and ask people to select the top 15 or 20. As it is these are the IDT Teams selection of 18 priorities and as such limits the public’s response to priorities.

Regarding Tree canopy [Google's Tree Canopy Lab taps AI to help cities plan tree planting projects](#). Venturebeat.com Nov 18, 2020

"Tree Canopy Lab aims to address some of the blocks by analyzing satellite images collected from planes during the spring, summer, and fall seasons. Pairing these with the data analysis capabilities of Google AI and Google Earth Engine, the tool pinpoints all trees in a city and measures their density. The imagery used for Tree Canopy Lab's calculations includes color photos that closely represent how a city might be seen from the sky. To extract even more information about a city's canopy cover, near-infrared photos reveal colors and details that human eyes can't see, comparing images from different angles to create a height map."

A second article also on this "[Google debuts an AI tool for tracking tree canopy coverage with LA](#)", ArchPaper.com Nov 2020

"Per Google, it plans to share data and insights gleaned from Tree Canopy Lab with "hundreds" of cities in the coming year while it continues to improve the technology based on the pilot roll-out in Los Angeles. City officials and planners who are looking to beautify and cool down their respective burgs are also encouraged to proactively reach out and get involved."

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**From:** Elby Jones <ejones@forterra.org>  
**Sent:** Wednesday, December 9, 2020 1:17 PM  
**To:** Pinto Urrutia, Sandra <Sandra.PintoUrrutia@seattle.gov>  
**Subject:** Seattle Urban Forest Management Plan Comments

**CAUTION: External Email**

Hi Sandra,

Our Green Cities teams went through the plan and I compiled all the comments - See attached. Hope you're well and talk to you shortly!

Thanks,

**Elby Jones**  
Green Cities Program Manager  
Forterra | Land for Good  
T 206-905-6890 | W [forterra.org](http://forterra.org)  
*Pronouns: [they/them/theirs](#)*

**Seattle Urban Forest Management Plan Comments – Forterra Green Cities Team**

12-9-20

Page 4: Seattle's Relationship to Trees

- Timeline centers European settlers and has a voice of written by colonizers, for colonizers

The region where Seattle is now located has a rich history, ranging from the time before the European settlement, where the forest was central to the culture and lifestyle of the indigenous people that inhabited the area, to redlining that led to a pattern of Black, Indigenous, and People of Color residents disproportionately living in less desirable areas with lower canopy cover, to today.

- More of a call out of native folks prior to 1700's
  - Specifically mention how they managed forests
  - Add more history - goes from one line of mentioning native folks, to European settlement – skips thousands of years
- Mention how land was not managed the same way after the City was incorporated
  - Mention that native folks were not allowed within city limits after the city was incorporated – had no say in parks and natural resource management
- 1700s box: “Local population” is confusing, could refer to populations of plants. Should specifically call out indigenous people. Glosses over violence of removal of native people.
- Add a more specific line to call out specific neighborhoods that were impacted by redlining

#### Page 16: Unsanctioned Encampments

- Section could be flushed out and more nuanced
- “Normal use of public property” – With so many varied uses of natural spaces, “normal” is not a great word to use here
- Term “temporarily down on their luck” seems cavalier - instead address that the system has failed people and homelessness is beyond their control
- Could specifically mention that the system is broken, housing needs to be addressed - what is Seattle doing to address it?
  - Reference resources that the city has allocated to address the problem
- Views (Page 14) – glosses over destruction cause by tree removal for views
  - This is problematic because so much is focused on encampments damaging trees, but does not address the damage done by wealthier people hiring contractors to top and/or remove tree – sometimes trees on public property.

#### Page 31:

- No support for private homeowners to maintain trees - people often remove trees because they can't afford to maintain them.
  - This is called out on Page 31 in box 4, but not in the challenges sections (Page 12) – Establishment and maintenance costs somewhat addresses this, but it could be flushed out more.

#### Page 36:

- Tons of research is already out there on trees and gentrification. Go a step further and add steps about how to stop gentrification.

### 6. Understanding of how planting trees and improving the urban forest may lead to gentrification and displacement.

#### Typos:

- Page 15

the urban forest. Accommodating large trees on small lots is challenging. Denser residential development leaves less **pace** for trees and must accommodate multiple private open spaces, more

- Page 19 – sentence doesn't seem to be finished/ends oddly
  - Lead engagement efforts to BIPOC communities in culturally relevant ways and **in language**
  - Implement Trees for Neighborhoods and Tree Ambassador projects with emphasis on engaging BIPOC communities Comply with the City's Two-for-One Tree Replacement Policy and report numbers quarterly to OSE
  - Participate in the City's Urban Forestry Core Team, Management, and Interdepartmental Teams
  - Manage the City's Trees for Seattle website and social media channels

#### Overall

- Who is your audience? Reframe how you talk to/about people. Seems aimed at affluent, educated, white people.
- Outline plan for HOW they plan to work with BIPOC communities
- No mention of cultural importance and/or uses of trees
- Add maps: Tree canopy map? Maps of tree canopy overlaid with race and/or income?
- Add a GSP photo (Page 23) – Forterra can share photos, if needed