



MEMORANDUM

TO: Urban Forestry Commissioners
FROM: Mark Mead, Acting Manager, Natural Resources Unit
DATE: May 24, 2010
SUBJECT: Tree Management, Maintenance, Pruning and/or Removal Policy

Requested Board Action

This briefing is to provide information to the Urban Forestry Commissioners about the Tree Management, Maintenance, Pruning and/or Removal Policy (Policy 5.6.1, Attachment 1). Recent citizen questions about the Policy have led Parks to impose a moratorium on new tree trimming permits; the moratorium will continue until after review of the Policy by the City's Urban Forestry Commission and the Park Board. No action is being requested from the Commission at this time.

Policy Description and Background

For decades Parks and Recreation allowed tree removal, topping or trimming of park trees. In the mid 1990's Parks began to manage park trees more carefully and deliberately, due to greater recognition of the value of the urban forest. In 2000, a process began to review existing policies related to park trees. The department held a series of meetings across the city in 2000 and 2001 to allow citizen review and comment on tree policies. The issue of tree trimming permits was the point of largest contention at the meetings. A majority of the audiences at these meetings were not in favor of allowing permits for trimming trees for views.

To create a more useful and coordinated policy, all tree related issues were combined within a single policy: Policy 5.6.1 – Tree Management, Maintenance, Pruning and/or Removal (Attachment 1). After review by the Board of Park Commissioners the new policy was approved by the Superintendent. Responding to the public input and the Board's recommendation, the policy sets four standards for trimming park trees:

1. Parks will not allow topping of trees through permits;
2. All work will be done according to International Society of Arboriculture Trimming standards and applicable land use regulations;

3. All work will provide public benefit to Parks resources; and
4. No tree will be removed for private view enhancement.

Regarding the requirement that there be a public benefit for tree trimming to be allowed, Parks has required some invasive species removal and the planting of a limited number of native understory plants in the immediate area of the trees trimmed to as public benefit. This specific benefit is described in a Vegetation Management Agreement that is part of the permitting package signed by the applicant for the tree trimming permit and the contractor performing the work. In cases where the permit requires planting and management of the site for several years, an escrow account is set up with the appropriate amount to be paid to the contractor as the work is done.

Over the last eight years Parks has worked with adjacent property owners to implement this policy. A significant change from earlier tree policy has been the elimination of the practice of topping trees for private view enhancement. Topping, the indiscriminate “hedging” of trees, was once considered an appropriate pruning practice. However, professional organizations and citizen advocates have recognized the practice of topping as being detrimental to tree health and safety. Since the mid 1900’s Parks has not allowed the topping conifers; in the 1980’s the department began to limit the extent of topping deciduous trees. However, because of earlier management practices, many of the trees in park green spaces are Bigleaf maples that have been previously topped. With greater emphasis on tree care and proper arboricultural practices in the late 1990’s Parks began an effort to eliminate the topping of trees for any purpose other than the maintenance of dedicated public viewpoints.

To accommodate private views, Parks has issued permits allowing a trimming process known as drop-crotching or crown reduction to create some height reduction in the trees. Canopy reduction is still limited to no greater than 25% of the trees overall canopy, and all pruning cuts must be done to International Society of Arborist standards. In some cases pruning is done in conjunction with the application of hormonal growth regulator, which reduces the elongation of cells in the tree stems, thereby reducing the length the limbs will grow after the pruning. While the above practices do have negative impacts on trees, they will not cause the same level of rapid decline that topping would have on a tree.

Possible Issues for Additional Review

1. What extent of public benefit should be required to issue a pruning permit?

The Tree Policy includes criteria for determining the public benefit of a pruning request (Section 6.4) and a process for the Senior Urban Forester’s review. Since the Policy was approved in 2001, pruning permits have been issued if the applicant commits to site improvement or vegetation management. Citizens have recently questioned whether the standard for meeting the public benefit requirement should be raised. Some have suggested that the public benefit must be directly related to the work on the tree(s) that are the subject of the permit, meaning pruning for the health of the tree or safety of the public. Holding to this standard for public benefit would in effect eliminate the great majority of tree pruning permits.

2. Should Parks revisit the fees charged for tree pruning/removal permits?

The department charges \$35 to apply for a tree trimming/removal permit and \$100 if the permit is approved. The cost in staff time to review the permit application and subsequently monitor the work is not covered by the fees.

Next Steps

The Seattle Parks Board will be reviewing the policy prior to the June Urban Forestry Commission meeting, and staff will report back to the Commission on their feedback. After the Urban Forestry Commission meeting, Parks will review the policy considering input from the Parks Board and the Commission.

Additional Information

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Department Policy & Procedure

City of Seattle

Subject: TREE MANAGEMENT, MAINTENANCE, PRUNING AND/OR REMOVAL	Number 060-P 5.6.1	
	Effective June 1, 2001	
	Supersedes 5.6.1 (3/14/75); 5.6.2 (4/22/75); and 5.6.3 (5/1/86)	
Approved:	Department: Parks and Recreation	Page 1 of 18

1.0 PURPOSE STATEMENT

To maintain, preserve and enhance the urban forest within parks. To increase the overall tree canopy, tree health and tree longevity within parks and to ensure that parks trees are managed in a manner that is consistent with other departmental and municipal policies.

2.0 DEPARTMENTS AFFECTED

- 2.1 City Light
- 2.2 Department of Design, Construction and Land Use
- 2.3 Department of Neighborhoods
- 2.4 Department of Parks and Recreation
- 2.5 Executive Services Department
- 2.6 Law Department
- 2.7 Seattle Public Utilities Department
- 2.8 Seattle Transportation Department

3.0 DEFINITIONS

- 3.1 **Parks Property** is any property that is owned or managed by Seattle Department of Parks and Recreation.
- 3.2 **Vegetation Management Plan** is a plan for the long-term restoration, renovation and care of the vegetation within the boundaries of a particular site. A complete plan must include the following:
 - Site inventory and assessment of the area including a site map that illustrates existing topography and vegetation, as well as locating other pertinent natural resources and constructed features.

- Trees proposed for removal and or pruning must be specifically designated.

- Specific planting design showing species, size and location and any necessary erosion control/slope stabilization methods.
- Public involvement plan, if applicable, in compliance with DPR Public Involvement Policies and Procedures.
- Maintenance plan that includes tasks, frequencies and resources. These may include watering, weeding, mulching, and pruning, etc. It may also include a completed Maintenance Agreement signed by permittee.

For Tree Work Permits, a preliminary vegetation management plan may be submitted with a permit application to define the scope and intent of the request. A complete plan approved by the Superintendent or designee will be required before a permit can be approved. See Section 7, Procedure.

3.3 **Clearing Thresholds*** are criteria used to help determine whether or not to require a Vegetation Management Plan. The proposed removal of vegetation exceeding the following thresholds is likely to require a plan:

In Environmentally Critical Areas:*

- Any tree of 6 inches caliper or greater, measured 4.5 feet above the ground; or
- Any combination of trees 1.5 inch caliper, measured at 4.5 feet above ground, which totals a cross-section area greater than 28 square inches or equivalent to a tree cross-section of 6 inches; or
- Any combination of trees or other vegetation covering an area of 750 square feet or more.

In areas not designated as Environmentally Critical Areas:

- The clearing of non-native species that exceeds 1200 square feet, or
- clearing of native species that exceeds 750 square feet, or
- The clearing of a combination of native species and non-native species that exceeds 1000 square feet, or
- The removal of greater than four (4) tree stems with stem calipers six (6) inches or greater, measured 4.5 feet above the ground; or
- Any combination of trees 1.5 inch caliper, measured at 4.5 feet above ground, which totals a cross-section area greater than 112 square inches; or
- The clearing of vegetation is visible from surface roads in the immediate vicinity of

the property and exceeds 750 square feet.

**Consistent with DCLU Director's Rule 3-94*

- 3.4 **Qualified Arboricultural Professional** is a tree care professional with a minimum of two years experience in the evaluation and care of trees in combination with a professional license or certification that measures minimum competency in relevant subjects, including protection of public health, safety and welfare. Acceptable titles include Certified Arborist, Registered Consulting Arborist, Certified Forester, and Landscape Architect.
- 3.5 **Developed landscape** is park property that has been graded and/or planted, and contains plantings that are distinct from typical native forest. These landscapes are routinely maintained by park staff for active and/or passive recreational use by the public. Developed landscapes may include, but are not limited to: lawns, athletic fields, boulevards, golf courses including pitch and putt, lawn bowling greens, play areas, squares, places, triangles, swimming beaches and special gardens (Arboretum, Japanese Garden, Kubota Garden, Parson's Garden, Volunteer Park and Conservatory, Woodland Park Rose Garden, and the Zoo.)
- 3.6 **Undeveloped landscape** is park property that contains native or volunteer (self-propagated) plants and is not intended for recreational use except along designated trails. Undeveloped landscapes include any property that was acquired as a "Greenspace" under the City's Greenspaces Policy (1993). Undeveloped landscapes are usually not as intensively maintained as developed landscapes.
- 3.7 **Hazardous Tree** is a tree that can be predicted to fail and has a high probability of striking people or property causing injury or damage.
- 3.8 **Tree failure** is the breaking and falling of a tree or any substantial part of a tree. This does not include falling leaves or fruit.
- 3.9 **Crown cleaning** is the removal of the dead, dying, diseased, crowded, weakly attached, low-vigor branches, and watersprouts from a tree's crown.
- 3.10 **Crown thinning** is the selective removal of branches to increase light penetration and air movement, and to reduce weight.
- 3.11 **Crown restoration** is pruning to improve the structure and appearance of trees which have sprouted vigorously after the upper portion of the tree canopy has been broken, topped or severely pruned.
- 3.12 **Topping** is the removal of the terminal shoot of a tree to a stub or lateral branch that is not sufficiently large enough to assume a terminal role **or** cannot be expected to achieve wound closure to inhibit decay.

- 3.13 **Phase of work** is a specific work activity (clearing, removal, installation, planting, maintenance, etc.) on a specific part of the project site as delineated on the permit documents and/or an appropriately scaled map.
- 3.14 **Invasive exotic vegetation** consists of species of plants that are not native to the Puget Sound basin and exhibit aggressive growth to the exclusion of native or planted landscapes. Examples include, but are not limited to: Himalayan blackberry (*Rubus discolor*), English ivy (*Hedera helix*), English holly (*Ilex aquifolium*), reed canarygrass (*Phalaris arundinacea*), purple loosestrife (*Lythrum salicaria*), and Scot's broom (*Cytisus scoparius*).
- 3.15 **Foliar coverage** is the percentage of the ground surface area with leaf or stem cover vertically above it, measured at a resolution of 1 foot square or finer.
- 3.16 **Mature canopy volume** is the estimated area of foliar coverage (area inside the "dripline") that can be expected from a mature tree of a given species in a particular setting multiplied by the mature height that can be expected from that same tree in the same setting.

4.0 **POLICY**

- 4.1 **Criteria for Tree and Vegetation Work:** Specific criteria will be established and applied to the removal and/or pruning of trees, shrubs and/or vegetation located in or on park property (see Section 6.5). The criteria will be used to evaluate the overall public benefit of the proposed work. In all cases, safety concerns will receive the highest priority. Priority will be given to limiting removal, increasing forest canopy, and preserving appropriate vegetation on Parks property.
- 4.2 **Hazardous Tree Management:** Public health, safety and general welfare will be maintained through the use of generally accepted professional practices of evaluation and treatment to reduce risks to people and property from hazardous trees. Attention to proper selection, planting and maintenance of new trees will also be pursued to achieve long-term risk reduction. Refer to Section 8 for management criteria.
- 4.3 **Pruning Standards:** The latest pruning standards established by the International Society of Arboriculture will be used in the maintenance of park vegetation.
- 4.4 **Topping Disallowed:** Because “topping” of trees can cause permanent damage by promoting decay, as well as unnatural, dense and weak branching structure, topping will not be practiced or permitted except under special circumstances.
- 4.5 **Tree Retention and Protection during Construction:** Healthy trees on construction sites will be conserved wherever possible. Trees designated for retention will be protected from construction impacts according to Standard Plans and Specifications and Landscape, Horticulture and Urban Forestry Best Management Practices. Planning for construction projects near trees will include resources for arboricultural services in design and construction phases.
- 4.6 **Tree Protection:** The health and physical state of parks trees will be maintained and protected whenever possible. Instances not specifically covered elsewhere in this policy include:
- 4.6.1 **Conservation of Rare Specimens:** Individual trees that are considered rare because of size, species or historical significance will be given extra protections and consideration for retention.
- 4.6.2 **Existing Trees That Are Being Impacted by Surrounding Land Uses:** A good faith effort will be made to consider options for changing park use patterns that are damaging trees. Examples: cars parking on tree lawns may be subject to an education and/or enforcement campaign to reverse the damage to the tree roots; pathways causing excessive compaction around tree roots may be relocated if other options are deemed insufficient.
- 4.6.3 **Diseased or Infested Plants That Pose Risk to Trees:** Whenever possible, action will be taken to effectively decrease risk to other trees from pests and diseases. This may include removal and destruction of affected materials, pesticide treatments and/or alternative cultural practices. Other knowledgeable agencies

(Office of Sustainability and Environment, Washington State University Cooperative Extension, Washington State Department of Agriculture) will be consulted as needed.

- 4.6.4 **Damage, Vandalism and Illegal Cutting:** Whenever possible, action will be taken to investigate and prosecute vandalism and illegal cutting of city-owned trees. Section 18.12.070 of the Park Code makes it illegal for anyone to vandalize or remove vegetation in a park. Compensation for damages will be sought based on the appraised value in accordance with the ISA Guide for Plant Appraisal, 9th edition, or successor.
- 4.7 **Tree Replacement:** At least one tree will be planted for every tree that is removed from park property. Replacement tree species will be selected so that overall mature canopy volume will be maintained or increased. It is preferable to plant the replacement tree in close proximity to the original tree's location. Alternately, the replacement tree may be located elsewhere, and this is preferable if local conditions contributed to the previous tree's failure. New locations should be found on the same site or in the same neighborhood at a location of similar or greater value.
- 4.8 **Viewpoints:** Views from designated public view parks and viewpoints will be preserved through maintenance and management of parks vegetation in front of or below the viewpoint. See Section 10.1 Appendix.
- 4.9 **Permits:** Requests for pruning and/or removal of park trees and other vegetation by Seattle residents or property owners will be considered. No trees will be removed solely for private views. Any work related to private views must achieve public benefit beyond the view relief as outlined in Sections 6.4 and 6.5. Requests will be reviewed by criteria established in Section 6. There is no guarantee that permit applications will be approved. Permit fees will be set to fully recover costs for staff to process, administer, monitor and enforce permit agreements. This includes cost recovery for any related public involvement process.
- 4.10 **Vegetation Management Plan:** A Vegetation Management Plan will be required for a park or park area under certain circumstances. A Plan may be required by the Park Horticulturist based on threshold criteria listed in Section 6.5. When a plan is required, it must be approved by the Superintendent or designee before any work may take place.
- 4.11 **Wildlife and Habitat:** Trees and forested areas are recognized as important habitat for native wildlife. Trees and undeveloped landscapes will be managed for wildlife habitat in accordance with the department's Wildlife and Habitat Management Plan.
- 4.12 **Slope Stability:** The relationship of vegetation to slope stability will be a primary consideration in all proposed vegetation management on steep slopes (refer to Section 6.5.4).
- 4.13 **Phasing:** When appropriate, the Department will consider a phased approach to vegetation management actions in order to reduce potential short-term negative aesthetic and/or wildlife habitat impacts associated with such actions (refer to Section 6.5.11).

- 4.14 **Partnerships:** Volunteers and/or community groups will be important partners to achieve objectives for urban forestry. These partnerships may develop through the Department’s tree work permit process, as well as through the Department’s Forest Restoration and Adopt-a-Park Programs.

5.0 RESPONSIBILITY

5.1 General

The “responsible party” indicated below will conduct the required “review” by collecting relevant information and presenting it to other appropriate Department and City staff who have responsibilities for the area under consideration. The responsible party will include the Department's relevant geographic division and other parks staff as appropriate in the decision-making process particularly with complex work where community or related interests must be considered. The responsible party will verify that all required permits have been obtained before issuing any approval. In parks that are designated as a City of Seattle landmark or are located in a landmark or special review district, the responsible party will verify that a Certificate of Approval from the respective board or commission was issued, if required.

5.2 Removal of Trees:

It will be the responsibility of the Department's Senior Urban Forester or designated representative to review and approve all action taken relevant to the removal of trees from all park properties.

5.2.1 It will be the responsibility of the Senior Urban Forester or designated representative to post notices regarding the proposed removal for trees that are a prominent feature of the park landscape unless they are rated high hazards.

5.3 Pruning of Trees and Shrubs:

5.3.1 It will be the responsibility of the Senior Urban Forester or designated representative to review and approve all actions taken relevant to the pruning of trees and shrubs that require climbing and/or the use of an aerial bucket truck.

5.3.1 It will be the responsibility of the Senior Gardener designated for the specific site to review and approve all action taken relevant to the pruning of trees and shrubs that do not require climbing and/or the use of an aerial bucket truck.

5.4 Planting of Trees, Shrubs, and Other Vegetation:

5.4.1 It will be the responsibility of the Senior Urban Forester or designated representative to review and approve proposed planting or replanting in undeveloped landscapes. If a Vegetation Management Plan is required, see Section 6.5.

5.4.2 When a plan or design is proposed, it will be the responsibility of the Landscape Architect designated for the specific site to review and approve all action taken relevant to the planting of trees, shrubs, and other vegetation in developed landscapes or in undeveloped landscapes adjacent to other public infrastructure. If a Vegetation Management Plan is required, see Section 5.11.

5.4.3 It will be the responsibility of the Senior Gardener designated for the specific site to review and approve all action taken relative to the planting of trees, shrubs, and other vegetation for routine replacement and renovation in developed parks when there is no plan or design.

5.4.4 It will be the responsibility of the Park Horticulturist or designated representative to decide if a Vegetation Management Plan will be required. See Section 6.5.

5.4.5 It will be the responsibility of the Senior Urban Forester or designated representative to ensure that a proposed Vegetation Management Plan includes the proper elements and has been subject to the appropriate departmental and public review as well as the appropriate coordination with other affected agencies and property owners.

- 5.4.6 It will be the responsibility of the Superintendent of Parks and Recreation or designee to approve all Vegetation Management Plans.
- 5.5 **Construction around Trees:**
 - 5.5.1 It will be the responsibility of the Senior Urban Forester or designated representative to review and approve all construction activities around existing trees in all park properties.

5.5.2 It will be the responsibility of the Project Manager or Construction Crew Chief to consult with the Senior Urban Forester or a qualified arboricultural professional to assess the potential for tree preservation on a construction site during project planning.

5.5.3 It will be the responsibility of the Project Manager or Construction Crew Chief to consult with the Senior Urban Forester or a qualified arboricultural professional to ensure standard tree protection practices and departmental Best Management Practices are properly utilized during construction activities.

5.6 Tree Protection:

5.6.1 It will be the responsibility of the Senior Urban Forester to take actions to protect existing Park trees that are at risk for damage, including the instances described in Section 4.6. It will be the responsibility of the Senior Urban Forester or designated representative to determine what correction or compensation can be made for tree damage that has occurred.

6.0 CRITERIA FOR DEPARTMENTAL ACTION

6.1 Trees, shrubs, and vegetation that will be considered for **REMOVAL** will include:

6.1.1 Hazard trees which pose substantial risk to the park users, adjacent properties or park facilities.

6.1.2 Trees, shrubs and vegetation which are dead, dying, or diseased.

6.1.3 Trees, shrubs and vegetation which create visibility problems (sight line) near roadways, bikeways and service access areas and may contribute to unsafe conditions to park users will be removed to a point where public safety is insured.

6.1.4 Removal from properties being improved or developed under an approved design, but with prior consideration to retention given whenever possible (see Section 4.5).

6.1.5 Trees shrubs, and vegetation that may interfere with a designated public viewpoint as designated in Section 10.1.

6.1.6 Trees that block trails, drains or otherwise obstruct the use and function of park infrastructure elements..

6.1.7 Trees on sites that were overplanted by design or are crowded from natural competition. As the landscape grows, the Senior Urban Forester may selectively remove trees on a site to maintain spacing for optimal tree growth and function.

6.1.8 Trees in undeveloped landscapes as part of forest management to create light gaps, snags or other restorative features.

6.1.9 Requested removal by a Seattle property owner. Certain requirements and criteria must be met in order to qualify for removal. See Section 6.4. Such requests do not obligate the Department to remove or allow removal of any trees, shrubs, and/or vegetation.

- 6.2 **REPLACEMENT PLANTINGS** will be undertaken to mitigate effects of vegetation removal and to reestablish the landscape and increase overall mature forest canopy. Vegetation Management Plans will be required under the conditions outlined in Section 4.10 and will be subject to the definitions of Sections 3.1 and the objectives of Section 6.5.
- 6.3 Trees, shrubs, and vegetation that will be considered for **PRUNING** will include:
- 6.3.1 Park areas identified as places of illegal or inappropriate activity in order to improve general visibility and increased police surveillance.
 - 6.3.2 Dead, dying, and diseased sections to improve the health, and appearance of the tree and to prevent accidents.
 - 6.3.3 Removal of lower tree limbs to a height of 8 feet for pedestrian clearance and 14 feet for vehicular clearance on boulevards and parkways.
 - 6.3.4 General park pruning for clearance to prevent injuries and facilitate maintenance.
 - 6.3.5 Pruning for clearance around street and security lights.
 - 6.3.6 Pruning by City Light Department and Metro Transit, *subject to advance notice and assurance of least damage to aesthetic value.*
 - 6.3.7 Pruning back for authorized passage on service roads, walkways and paths.
 - 6.3.8 Pruning for crown cleaning, crown thinning, and crown restoration.
 - 6.3.9 Pruning for public viewpoints as designated in Section 9.1.
 - 6.3.10 Requested pruning by a Seattle property owner. Such requests do not obligate the Department to prune trees, shrubs, and/or vegetation. See Section 6.4.
- 6.4 **PERMITS:** Consideration will be given to requests made by a Seattle property owner for pruning, and/or removal, of trees, shrubs, and vegetation on park property including, but not limited to, open space, undeveloped landscapes, greenbelts, and boulevards. Such requests will be reviewed by the Senior Urban Forester or designated representative. Overall public benefit of the proposed work will be evaluated by the Senior Urban Forester, including, but not limited to the following criteria:
- 6.4.1 The purpose for which the property was acquired by the City.
 - 6.4.2 Historical background of the property.
 - 6.4.3 Current use and function of the property.
 - 6.4.4 Proximity to overhead power lines and other utilities.

- 6.4.5 The condition, value, type and amount of the vegetation.
 - 6.4.6 The aesthetic and biological impacts of pruning or removal on the vegetation.
 - 6.4.7 The potential for replacement with more desirable vegetation.
 - 6.4.8 The potential impacts on Department's maintenance workload.
 - 6.4.9 The potential impacts on the aesthetic quality of the surrounding area.
 - 6.4.10 The potential impacts on the symmetry of the street, boulevard, or way.
 - 6.4.11 Potential environmental impacts on soils, slope stability, water quality, native wildlife, and wind exposure.
 - 6.4.12 Consistency with the standards of Environmentally Critical Areas policies and regulations.
 - 6.4.13 Special consideration for native vegetation in undeveloped landscapes.
 - 6.4.14 Special consideration for unique varieties, vegetation of great age, rare vegetation, or vegetation of horticultural or historical significance.
 - 6.4.15 The potential increase to overall forest canopy .
- 6.5 **VEGETATION MANAGEMENT:** Vegetation Management Plans will be required for certain projects and permits based on the threshold criteria listed below. Proposed Vegetation Management Plans will be evaluated for public process and content to achieve the following performance criteria and management objectives. Not all items will be applicable for all situations.
- 6.5.1 **Threshold Criteria**
- **Clearing Thresholds:** Does the scope of work exceed established clearing thresholds?
 - See Section 3.3.
 - **Compliance with Departmental Policy:** Does the scope of work comply with departmental policy?
 - **Enhancement Potential:** Does the scope of work have the potential to achieve enhancement of the vegetation resource for public benefit, specifically with regards to policies presented in Section 4 concerning tree protection, tree replacement, wildlife habitat, slope stability, and partnerships. Does the scope of work have the potential to achieve management objectives listed below?
- 6.5.2 **Performance Criteria**
- **Completeness:** The plan must be complete, including all elements in Section 3.1.
 - **Adequacy of detail:** The plan must show a level of detail so that exact trees and vegetation designated for work can be identified in the field with the information

provided in the plan. The plan must detail what activities will happen where and in what time frame.

- **No unacceptable element:** The plan must not contain any element that is contrary to departmental policy, applicable laws or best management practices.
- **Application process followed:** The plan must demonstrate that all required steps of the planning and review process were followed thoroughly, including procedures required under the department's Public Involvement Policies and Procedures.
- **Adequacy of resources to complete the project:** the plan must describe what resources are required to complete the project, which are currently secured, and how other resources will be secured to meet the plan's timelines.

6.5.3 Management Objectives

- **Extent of Vegetation Management:** The area considered for vegetation management shall consider site conditions and the adjacent landscape makeup so as to avoid fragmenting the appearance and ecological function of the overall landscape.
- **Phasing of Vegetation Management:** For projects exceeding clearing thresholds, wholesale tree removal should be limited in area, unless public safety would be compromised to do so. Where a large number of removals are anticipated, they should be phased over several years, and/or done selectively to lessen aesthetic and wildlife impacts. Replacement of trees and other vegetation (see Sections 6.5.20 and 6.5.21) will be done concurrently with removal work to ensure timely reestablishment of vegetative canopy.
- **Public Safety:** All trees in an area being considered for Vegetation Management will be evaluated for safety by a qualified arboricultural professional. Remedy for any unacceptable hazards will be included in the Vegetation Management Plan.
- **Soil and Water Conservation:** All proposed vegetation work will meet or exceed the specifications of City of Seattle Construction Best Management Practices Manual. In addition, the following criteria should be met. Selective clearing should be employed wherever possible to retain desirable vegetation. Phases of work should be scheduled to minimize the amount of time any area remains unvegetated. Site access should be planned on existing trails or along defined travel corridors to prevent widespread trampling and soil compaction in work areas. Mulch, geotextile fabric or other surface treatment should be utilized to insure that no bare mineral soil is left exposed after site work is completed.
- **Potential Slide Areas:** Vegetation Management Plans in potential slide areas will be reviewed by a licensed geotechnical engineer prior to approval. Current map information available from City of Seattle's Department of Design, Construction and Land Use should be used to evaluate individual locations.
- **Historical and Design Considerations:** A Vegetation Management Plan will describe the historical context of the site, including the existence of any adopted landscape design for the area under consideration. If an adopted design does exist, the Vegetation Management Plan will adhere to the design, or the plan may need to be considered for revision. For parks that are designated as a City of Seattle landmark or are located in a landmark or special review district, the responsible party will verify that a Certificate of Approval has been obtained from the respective board or commission.

- **Habitat Improvement:** Vegetation Management Plans should improve wildlife habitat, as recommended in the Department's Wildlife and Habitat Management Plan. The Park Horticulturist may require involvement of a wildlife biologist in plan development.
- **Limiting Canopy Reduction:** The number and extent of work areas that lower canopy heights or reduces canopy coverage will be limited so as to avoid widespread loss of native forest structure, which typically consists of trees that achieve closed canopy in excess of 100 feet of height. Furthermore, canopy reduction areas should be located so as not to fragment existing habitat areas. Mitigation and planting will be required to match or exceed the loss of mature canopy. Exceptions to this will be made for designated public viewpoints.
- **Native Vegetation:** Native vegetation, especially conifers, are considered preferable for undeveloped landscapes. Exceptions to this may be made where disease or other environmental factors make reestablishing exclusively native vegetation problematic. A list of native plant species can be found in the Department's Wildlife and Habitat Management Plan. This list is not comprehensive.
- **Control of Invasive Exotic Vegetation:** Areas that contain significant amounts of invasive exotic vegetation should be aggressively managed to reduce or eliminate these populations. Once they are controlled, competitive plantings should be established to provide defense against reinvasion.
- **Retention of Vegetation:** Recognizing the value of established trees and the cost of reestablishing vegetation, projects should retain and protect all vegetation not scheduled for removal. Exceptions to this will be made for areas excessively infested with invasive exotic species. Special consideration will be given for unique varieties, vegetation of great age, rare vegetation, or vegetation of horticultural or historical significance.
- **Replacement of Trees:** At minimum, each tree that is removed will be replaced by planting another tree close to the original location. Tree species selection and numbers will be required to meet or exceed the loss of mature canopy proposed by the project. Where large trees are removed, the Senior Urban Forester may require several trees to be planted to replace each tree removed. The replacement tree will be of the same species, unless cultural (e.g. promoting natural succession) or design (e.g. death was a result of poor original selection) considerations are strong indications for another species. If an adopted landscape or vegetation plan exists for the site, its recommendations for replacement species and locations will supplement the site conditions as selection criteria.
- **Replacement of Vegetation:** At a minimum, an area where vegetation has been removed will be replanted with mixture of woody and herbaceous plant species well adapted for the site conditions so as to achieve 100% projected foliar coverage within four years of planting. If an adopted landscape or vegetation plan exists for the site, plants that it specifies will be utilized if the existing site conditions are conducive to their growth.
- **Maintenance:** The landscape that ultimately results from Vegetation Management will be designed to minimize long-term maintenance requirements. A Vegetation Management Plan will identify all maintenance resources needed to establish and maintain the landscape until it achieves the intended results. Existing Departmental maintenance resources will not be impacted by Vegetation Management unless funding sufficient for the additional work is provided.

7.0 PROCEDURE FOR TREE WORK PERMIT:

The following procedures are for Seattle Parks and Recreation Tree Work Permits only. The following does not include procedures for other Department permits or permits that may be required by other agencies for a project.

- 7.1 Requests by Seattle residents or private property owners for the removal or pruning of trees located within or on parks and recreation property are subject to the procedures listed below. Requests by public agencies for the removal or pruning of park trees will be considered by the Senior Urban Forester, and may be subject to some or all of the procedures outlined below.
- 7.2 Obtain written comment from affected neighbors and/or property owners. Since each request will be considered on its own merit, the scope of required survey will be determined by the Senior Urban Forester, but will, at minimum be all properties within 300 feet of the area of work. Applicants are encouraged to involve neighbors and interested citizens in all phases of the plan development to facilitate a positive outcome for the public involvement process.
- 7.3 Submit an application for a permit, comment from neighbors, and a preliminary Vegetation Management Plan (if required by Section 4.10), to the Senior Urban Forester, to prune or remove any tree, shrub, and or vegetation.

- 7.4 Meet with the Senior Urban Forester or designated representative on the site, after submitting the permit application, to indicate which trees, shrubs and vegetation are involved, and to determine that such pruning or removal does not adversely affect the area.
- 7.5 Submit a complete Vegetation Management Plan (if required under Section 4.10). The plan must be submitted to the Senior Urban Forester for approval by the party requesting pruning and/or removals.

7.6 Response

- 7.6.1 The Senior Urban Forester will review the permit application and supporting materials and submit a written response to the applicant.
- 7.6.2 If necessary, the applicant will revise the application and resubmit to the Senior Urban Forester.
- 7.6.3 The Senior Urban Forester may accept or reject a revised application. If the application is accepted, it is not approved until the applicable procedures in Section 7.3 are completed.

7.7 Permit Decision

- 7.7.1 The proposed project may be subject to a public involvement process in accordance with the Department's Public Involvement Policy. (If it is not required, proceed to Section 7.4) Citizens, groups and organizations affected by the proposed changes must be included in the development of the plan. The applicant will be responsible for notification. At a minimum, standard signs must be posted at the proposed project site and the local community organization (e.g. Neighborhood or Community Club or Council) must be contacted and allowed input regarding the plan. Written comment from the local community organization is required as part of the Vegetation Management Plan. If the proposed project exceeds thresholds outlined in the Public Involvement Policy, a public meeting will be required. A public hearing with the Board of Park Commissioners may also be required.
- 7.7.2 The Senior Urban Forester will issue a report of the results of the public involvement process.
- 7.7.3 The report will be used as part of any Public Involvement Process.
- 7.7.4 For requests involving Vegetation Management Plans, such plans must be reviewed and approved by the Superintendent of Parks and Recreation or designee.
- 7.7.5 If the request is approved, the Senior Urban Forester will draft a permit for the proposed work to the applicant. This permit will be signed and sent to the applicant on submission of a signed maintenance agreement, payment of the

applicable permit fees, and deposition of project funds into an escrow account with the City of Seattle.

7.8 Execution

- 7.8.1 A starting and completion date for each phase of work will be set by mutual agreement of the permittee and Senior Urban Forester, which will be stated in the permit and compliance therewith will be required.
- 7.8.2 The permittee will submit the permit fees as set forth in the Department of Parks and Recreation Fees and Charges (current edition). The permittee will submit a *bona fide* bid for the permit work, for the life of the permit, from a qualified, insured and bonded tree service firm with an *International Society of Arboriculture Certified Arborist* performing and/or supervising the work. The permittee will deposit the full amount of the bid cost into an escrow account with the City of Seattle to be managed by the Senior Urban Forester. An escrow agreement outlining the conditions of the escrow account will be drafted by the City and signed by the permittee and Senior Urban Forester.
- 7.8.3 Acceptable proof of insurance for the performing tree service firm must be submitted, naming the City of Seattle as additional insured by endorsement, in amounts specified by the City's Risk Manager. The insurance must be approved by the City's Risk Manager and notice of approval received by the Department's Office and Accounting Supervisor before the permit will be issued. Those companies that regularly do business with the City of Seattle will not be required to submit individual insurance for each occurrence providing that a current proof of insurance is on file with the City's Risk Manager.
- 7.8.4 The permittee will perform all tree work *at no expense to the City* by a qualified, insured and bonded tree service firm with an *International Society of Arboriculture Certified Arborist* performing and/or supervising the work. All pruning must meet departmental standards, and all work is subject to inspection and acceptance by the Senior Urban Forester or designated representative.

7.9 Inspections

- 7.9.1 The Senior Urban Forester or designee may inspect a work site at any time and may issue a stop work order for any work being performed that is not consistent with the permit requirements and the standards referenced herein.
- 7.9.2 The permittee will notify the Senior Urban Forester at least two working days before commencing any phase of work to set up an on-site pre-construction meeting with the personnel conducting the work. The permittee will provide copies of the permit to all personnel conducting the work.
- 7.9.3 The Senior Urban Forester or designated representative will meet with the personnel conducting the work before work commences and on a regular basis during any vegetation work.

- 7.9.4 The permittee will notify the Senior Urban Forester within 48 hours of completing any phase of work to request an inspection. Following the inspection, the Senior Urban Forester will issue a notice of correction if any work is deficient or defective.
- 7.9.5 The Senior Urban Forester or designated representative will inspect the site least once a year during the maintenance phase of work. Following an inspection, the Senior Urban Forester will issue a notice of correction if any work is deficient or defective.
- 7.9.6 Uncorrected violations of the permit will result in imposition of civil or criminal penalties, or both. Costs associated with correcting defective work, including Department staff time will be billed to the permittee or will be reimbursed to the City from the permit escrow account.

7.10 Completion

- 7.10.1 Upon satisfactory completion of the work, the Senior Urban Forester will issue a signed Notice of Completion. Any unspent funds in escrow will be released to the permittee upon completion.
- 7.10.2 Approval or completion of a permit does not imply that future permits will be granted for similar or different work.

8.0 HAZARDOUS TREE MANAGEMENT STANDARDS AND PROCEDURES

- 8.1 The Department will assess and manage the risk of tree failure within the limits of available fiscal and human resources. Priority will be given to locations and situations with high probability of failure and high potential damage or injury that may result.
- 8.2 Visible defects that will be considered in hazard evaluation include, but will not be limited to, cracks in limbs and/or trunk, seams in limbs and/or trunk, spiral cracks in limbs and/or trunks, rib cracks, weak branch unions (V crotches), decay in limbs and/or trunk, cankers in limbs and/or trunk, deadwood, root problems, and poor tree architecture (form).
- 8.3 Aggravating factors in hazard evaluation will include, but not be limited to fast-growing species, sprouting from topping cuts, weak branch attachments, heavy end weight of branches, included bark, evidence of past branch/trunk failure, saturated soil, frequent irrigation, more than 30% of buttress roots decayed and/or disturbed, evidence of excessive mechanical bark damage, large dense crown, lack of basal trunk flare (poor taper), recent construction activity, willow soil, and mushrooms visible at base or in root zone. A combination of any of these factors may greatly elevate the hazard rating.
- 8.4 For determination of hazard rating the Department will utilize the Hazard Tree Assessment Tatum Guidelines as developed by the Minnesota Department of Forest Resources latest revision. See attachment. Trees that rate a high hazard will be

considered an imminent risk and will be scheduled for immediate remediation. Trees that are rated a moderate risk may be reevaluated at a specific interval or scheduled for immediate remediation.

- 8.5 In cases where the hazard rating of a tree or trees is in dispute the Senior Urban Forester will utilize the International Society of Arboriculture Tree Hazard Evaluation Form to perform the evaluation. The final determination will be made by the Senior Urban Forester as designated in Section 5.1.
- 8.6 Corrective action for high hazard rated trees will be reasonable and prudent and may include:
- Moving any at-risk structures, equipment, fixtures or recreational sites
 - Correction of the defect-by pruning, cabling and bracing, or tree removal
 - Closure of the area

9.0 **REFERENCES**

ANSI A300-1995 for Tree Care Operations-Tree, Shrub and Other Woody Plant Maintenance-Standards Practices. 1995. American National Standards Institute.

Albers, J., and E. Hayes. 1993. ***How to Detect, Assess, and Correct Hazard Trees in Recreational Areas.*** Minnesota Department of Natural Resources Publication.

City of Seattle Greenbelt Ordinance No. 111568,9.

City of Seattle Regulations for Environmentally Critical Areas. 1992, amended 1994.

Client Assistance Memo 331. Revised 1998. Seattle Department of Design, Construction and Land Use.

Construction Best Management Practices Manual. City of Seattle.

Council Resolution 28653 Greenspaces Policy 1993.

Director's Rule 3-94. 1994. Seattle Department of Design, Construction and Land Use.

Landscape, Horticulture and Urban Forestry Best Management Practices. 1999. Seattle Parks and Recreation.

Nelda P. Matheny and James R. Clark. 1994. ***Trees and Development: a Technical Guide to Preservation of Trees During Land Development.*** International Society of Arboriculture.

Nelda P. Matheny and James R. Clark. ***Evaluation of Hazard Trees in Urban Areas 2nd Edition.*** International Society of Arboriculture.

Public Involvement Policy for Proposals to Acquire Property, Initiate Funded Capital Projects, or Make Changes to a Park or Facility. 1999. Seattle Department of Parks and Recreation.

Seattle Department of Parks and Recreation Fees and Charges (current edition).

Tree-Pruning Guidelines. 1995. International Society of Arboriculture.

Urban Wildlife and Habitat Management Plan. 1994. Seattle Department of Parks and Recreation.

10.0 APPENDIX

Designated Public Viewpoints include but are not limited to:

Bagley Viewpoint	E. Roanoke St. and 10th Ave. E.
Bellevue Place	West end of Bellevue Place E.
Belvedere Viewpoint	S.W. Admiral Way and S.W. Olga St.
Bhy Kracke Park	End of Comstock Pl. off Bigelow
Boren-Pike-Pine Park	(Plymouth Columns)
Hamilton Viewpoint	California Ave. S.W. and S.W. Donald
Harbor Vista Park (Seacrest Marina)	1660 Harbor Ave. S.W.
Harborview Park	8th Ave. and Jefferson St.
Jose Rizal Park	1111 12 th Ave S.
Kerry Park & Viewpoint (Franklin Place)	211 W. Highland Dr.
Kinnear Park	W. Olympic Pl. and 7th Ave. W.
Kobe Terrace	Main St. and Maynard Ave. S.
Lakeview Park	Lake Washington Blvd. E. and Hillside Dr.
Louisa Boren Park	15 th Ave. E. and E. Olin Pl
Magnolia Boulevard	Magnolia Blvd, parking lot, S. of Montevisa Pl.
Marshall Viewpoint (incl. Bette Bowen Memorial)	7th Ave. W. and W.Highland Dr.
Mayfair Park	2nd Ave. N. and Raye St.
Parson's Gardens	7th Ave. W. and W. Highland Dr.
Rainbow Point (Banner Place)	N.E. Banner Place and Interstate 5
Rotary Viewpoint	35th Ave. S.W. and S.W. Alaska
Schmitz, Emma, Memorial Overlook Park	4503 Beach Dr. S.W.
Soundview Terrace Park	11 th Ave W. and W. Wheeler
Sunset Hill Park	7531 34th Ave. N.W.
Twelfth Avenue South Viewpoint	12th Ave. S. and S. McClennan

Hazard Tree Assessment Tatum Guidelines – for illustration purposes only

HAZARD POTENTIAL

Defect	oModerate	•High
Crack	<ul style="list-style-type: none"> oStem has single crack with cavity or decay oStem has single crack >5 ft or spiral crack >3 ft 	<ul style="list-style-type: none"> •Crack goes completely through stem •Stem has 2 cracks on the same segment with cavity or decay •Stem has crack in contact with another defect or at base of leaning tree •Any branch with a crack
Weak Unions	<ul style="list-style-type: none"> oA weak union with inrolled bark 	<ul style="list-style-type: none"> •A weak union that is also cracked, cankered, or decayed
Decay	<ul style="list-style-type: none"> oCanker-rot infection 	<ul style="list-style-type: none"> •Internal decay >2/3 of stem radius or root collar Σ •Canker-rot infection in the hot spot •Cavity or decay in contact with a crack •Any branch with decay
Canker	<ul style="list-style-type: none"> oCanker affects >1/2 of tree's circumference oCanker at base of leaning tree 	<ul style="list-style-type: none"> •Canker in tree's hot spot and affects >1/2 of tree's circumference •Canker in contact with a crack or decay •Canker and decay in the hot spot
Dead		<ul style="list-style-type: none"> •Any lodged branch •Any dead tree, top or branch
Poor Tree Architecture	<ul style="list-style-type: none"> oBranch unbalanced with respect to rest of crown mass oBranch with sharp bend or twist 	<ul style="list-style-type: none"> •Tree leaning over target at >45 degrees •Tree leaning over target with a defect in the hot spot
Root Problems	<ul style="list-style-type: none"> oRoot problems associated with stem decay, crack, or canker 	<ul style="list-style-type: none"> •Freshly leaning tree with recent rootlifting, soil movement, or mounding •Inadequate root support;>1/2 of roots severed

From "How to Detect, Assess, and Correct Hazard Trees in Recreational Areas", 1993, Minnesota Department of Resources-Forestry. Revised March, 1996.

ΣRule of thumb: Hazard trees have less than 1 inch of sound wood of outer shell, for every 6 inches of stem diameter.

Hot Spot: The area on a tree's trunk from 4.5' above ground to the first primary limb.

Sample Request for Permit letter – **for illustration purposes only** – subject to change with revisions in the fee schedule, insurance requirements and other City policies

DATE: _____

Applications for permission to prune, remove or otherwise work in proximity to trees on Seattle Department of Parks and Recreation property must be submitted in writing to the **Senior Urban Forester, Citywide Horticulture Division, Seattle Department of Parks and Recreation, 100 Dexter Avenue N. Seattle, WA 98109**. The application must include a description of the number and kinds of trees (deciduous, coniferous, etc.) that are to be pruned, removed, or otherwise impacted. It must also include the extent of pruning or other work, and any other pertinent information on the work being requested. A sketch and/or photos of the affected area would be useful. All adjacent neighbors affected by the proposed work or within 300 feet of the work site must be contacted by the requestor and their signatures included on the attached form. (They should indicate whether or not they favor the work.) *The completed application, application fee, and evidence of adjacent property owners' responses must be received by the Senior Urban Forester before the initial site visit will be scheduled.*

No pruning/removal can be done without written permit issued by the Seattle Department of Parks and Recreation. The procedure for issuing a permit is detailed in the Parks and Recreation Tree Policy. Prior to receiving a permit, the following conditions are the minimums that must be met:

The Department's Senior Urban Forester or designated representative must meet with the requesting party on the site to determine that the scope of work does not adversely affect the area in any manner.

A written statement must be submitted which certifies that all work will be done by a qualified, bonded arboricultural contractor, with a Certified Arborist on staff, according to the City's pruning standards, and at no expense to the City. The statement must also include that the permittee will deposit all construction funds in an escrow account before work can commence.

Start and completion dates must be articulated in the application. Compliance to that schedule is required.

A non-refundable permit fee based on the size of the project will be required if your application is approved, before a permit can be issued. The fee will be in the form of a check or money order made payable to the *Seattle Department of Parks and Recreation*. All fees must be received by the Senior Urban Forester before your permit can be issued.

If required, a signed maintenance agreement must be submitted with your permit fee.

The applicant must inform their arboricultural contractor to provide the Department a rider to the firm's existing liability insurance *naming the City of Seattle as additionally insured*, in minimum amounts of \$1,000,000 General Liability. The insurance rider must be filed with the Department's Senior Urban Forester, 1600 South Dakota Street, Seattle, WA 98108, before work may commence. *Contractors that have a current, valid certificate of insurance on file with the City's Risk Manager do not need to submit a certificate for each job.*

Complete each step entirely. Failure to do so will delay permission and work. After all conditions are met, please call the Senior Urban Forester(206-684-4113) **at least two working days in advance of the permit work** to arrange a site meeting on the first day of work. Any violation of the permit will result in the imposition of civil and/or criminal penalties.

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