

# Seattle Urban Forestry Commission

Matt Mega, Chair • John Small, Vice-Chair • Nancy Bird • Gordon Bradley  
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## DRAFT

December 14, 2011

Roy Francis  
Seattle Department of Transportation  
Urban Forestry Division  
P.O. Box 34996  
Seattle, WA 98124-4996

RE: SDOT Draft Street Tree Ordinance UFC Recommendation

Dear Roy,

The Urban Forestry Commission appreciates the efforts of SDOT in cooperation with the other departments to propose the 2011 Street Tree Ordinance. Providing our citizens, departments, franchise operators and developers with updated guidance on managing right of way trees in our city is a major step toward improving our urban forest canopy. We have reviewed the draft document dated 10-05-2011 and the 12-12-2011 version and put forth the following comments and recommendations:

The ordinance does not clearly describe limitations to the type and extents of pruning allowed or clearly describe ramifications (exceptions/mitigation planting/contribution to tree fund/citation) to work beyond these limitations.

### Definitions:

We recommend clarifying the following terms:

(15024.6 page 5)

- Hazardous tree -- add a rating number in which a tree is considered hazardous. Also identify the method in which a hazard tree is assessed, typically either the specific Pacific Northwest International Society of Arboriculture Tree Risk Assessment in Urban Areas or Hazardous Tree Assessment. We are concerned that any tree may be considered a hazard without a specific number to designate a hazard tree.
- Supervise and Supervision (as well as "on site") – we are concerned that 15.43.050 C might allow for one qualified supervisor to supervise multiple crews. This would not allow for crews to operate without oversight from a qualified arborist.
- Public place – we suggest clarifying because there are public places not controlled by SDOT. We suggest giving examples of what's not considered a public place.
- Tree Canopy-missing this definition

- Street Tree Manual – aka SDOT Tree Standards Manual, this document did not come up in a search of the city website.
- Major Pruning -- 15.43.030 B.2.b. could be further clarified by stating that “All major pruning shall use ANSI A300 Standard Specifications and comply with best management practices in the Street Tree Manual. Also, describing this by % of canopy will be difficult for citizens to determine unless part of the public notice procedure includes supplying a digital photograph of the tree. (Note in the Tree Standards Excessive is described as 25% versus 15%)
- Severe Crown Reduction -- is described as “not an acceptable form of pruning”. What are the repercussions to the individual that performs or directs Severe Crown Reduction?

Mitigation:

We have specific recommendations regarding developing additional guidance related to major pruning and removal of trees due to sidewalk, utility and franchise work.

Revisit the power and franchise issue in view of the reality that many necessary practices to keep trees from power lines results in detrimental effect to the health of the tree. We suggest a more streamlined approach to replacement of inappropriate trees with species adaptable to power line locations and/or mitigation through replanting.

1. If in order to maintain the integrity of power line there is a detrimental effect on the tree the utility should consult with SDOT’s City Arborist.
2. Mitigation could occur in different location however we suggest that mitigation be tracked to the same neighborhood zone as the removal. The sixth prelude identifies replacement of two trees for every one tree removed from City property. How would one determine the criteria for this replacement? Currently, the ordinance identifies replanting only within 15.43.030 B.2.c.
3. Automatic trigger for mitigation when utilities ‘top’ or perform severe crown reduction on a tree. This mitigation, as stated in point #2, may occur in a different location within the neighborhood, may be in the form of a tree fund contribution (fee-in-lieu) or may be exempt (due to felling during a severe storm event).

Ownership and damage:

Clarify financial responsibility for removal of privately installed and maintained street trees. (Yakima v. Shaw (sp?) on ownership)

15.43.030 A 1 a

Suggest Tree planting be separated from shrub planting to assist public understanding of issues.

15.43.040 C. describes private party responsibility for damage to underground utilities due to root intrusion. We believe this clause is too broad. The wording would discourage tree planting in most urban frontage property and this is in conflict with the precludes to this ordinance and the urban forest management plan goals of increasing tree canopy.

15.43.020 C

This requires a permit for seasonal tree lights. We suggest this requirement be actively publicized during the public comment period so citizens are aware that this permit will be required  
Street Tree Manual Standards and Specifications- UFC will review this document separately.

Public comment:

January 20 is the deadline for public comment. Since the release is during the busy holiday season we suggest extending the comment period by two weeks.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Mega", with a stylized flourish at the end.

Matt Mega, Chair  
Seattle Urban Forestry Commission

cc: Council President Richard Conlin, Councilmember Bagshaw, Councilmember Burgess,  
Councilmember Clark, Councilmember Godden, Councilmember Harrell, Councilmember Licata,  
Councilmember Rasmussen, Councilmember O'Brien, Peter Hahn, Jill Simmons, Barbara Gray,  
Michael Jenkins, Christa Valles

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