

Margaret Glowacki
Shoreline Planner
City of Seattle
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Dear Ms. Glowacki:

The City of Seattle Urban Forestry Commission has reviewed the Proposed Draft Shoreline Master Program Regulations. During this review we have identified several issues - that unless addressed –could result in the new shoreline code providing inadequate protection to existing trees and urban forest in the shoreline zone. Trees and large woody vegetation such as willows and dogwoods are critical to many of the ecological functions identified in the City of Seattle Draft Shoreline Characterization Report (2009). The lack of protection for non native trees in the current draft of the Proposed Shoreline Master Program Regulations could result in severe and unmitigated loss of ecologic function. Specifically the delivery, movement and loss of; water, sediment, large woody debris, phosphorous, nitrogen, pathogens, light energy could all be adversely affected if mature non-native trees and shrubs are replaced with native groundcovers. There is no compelling scientific literature to suggest that the ecological functions as defined by the city are not well met by non-native species. Also of concern to the commission is the lack of protection for existing native trees and shrubs. This is especially worrisome in regards to the lack of protection for the critical root zone of mature tees.

Specific comments

- Section 23.60.020 (18) Permits and Exemptions, under item 18 (temporary development of four weeks or fewer) the conditions should be appended to include :
 - d. Does not damage or remove any trees over 6" DBH, except in cases where it can be shown – to the satisfaction of the director – that to do so would improve the health of other trees as in thinning groves or clumps of over-crowded trees.
 - e. Does not include temporary development within or compaction of the critical root zone of any trees over 6" DBH.

Failure to make these additions could result in damage or removal of mature trees and significant loss of shoreline ecological function.

- Section 23.60.152 General development makes a fallacious assumption that all native vegetation provides high ecologic function. Canopy coverage, multi-

storied vegetation and species diversity are all important to ecologic function. We maintain that the standard for general development (23.60.152 (f) be updated to require native vegetation consisting of at least some trees, and shrubs in addition to ground cover and that disturbed soils be amended and decompacted to insure the success of plantings.

- Section 23.60.184 (D) Standards for fill should be appended with the following sentence: Fill shall not be placed in the critical root zone of any trees over 6" DBH, and work will not result in the compaction of soils in the critical root zone of any trees over 6" DBH. Failure to make this change could result in damage or death of mature trees and significant loss of shoreline ecological function.
- 23.60.190 (A) 4 Should include a more clear professional standard for the qualifications of persons preparing plans. The standard of training and expertise related to the type of ecological environment where the work will occur," is vague and lacks objective standards such as professional accreditation or state licensing requirements.
- Section 23.60.190 (A) 5. This sub-section, taken in context with subsection 23.60.190 (A) 3 should be updated to codify that all woody vegetation is accurately shown on the plans submitted, and that the size, species and location of trees is clearly shown. This information must be presented in a way that it can be easily verified by DPD staff.
- Section 23.60.190 (C) 1 Should be changed to read: "Normal and routine pruning and maintenance that promotes the health and vigor of trees and shrubs is allowed without submitting an application:." Failure to do so could result in pruning intended to dramatically shorten the life and reduce the ecologic function of trees and shrubs in the shoreline zone.
- 23.60.190(D)1(c) should be changed from, "no native trees are removed," to, "no trees over 6" DBH are removed." Failure to make this change could result in the loss of canopy, mature trees, shade, nutrient input and large woody debris recruitment.
- Section 23.60.190(D)2 should similarly include a provision against the removal of any tree over 6" DBH. Failure to make this change could result in the loss of canopy, mature trees, shade, nutrient input and large woody debris recruitment.
- Section 23.60.190(E)1 (c) should be changed from, "no native trees are removed," to, "no trees over 6" DBH are removed." Furthermore it should be stated explicitly that 750 square feet is the total maximum area allowed in the entire shoreline zone in one year. Failure to make this change could result in the

loss of canopy, mature trees, shade, nutrient input and large woody debris recruitment.

- Section 23.60.232 (D) 1,
- Section 23.60.258 (E) 1,
- Section 23.60.290 (E) 1,
- Section 23.60.332 (C) 1,
- Section 23.60.390 (D) 1,
- Section 23.60.410 (D) 1,
- Section 23.60.450 (B) 1,
- Section 23.60.490 (E) 1,
- Section 23.60.510 (E) 1, and
- Section 23.60.575 (D) 1 should all be changed from, “avoid reducing vegetation coverage,” to, “avoid reducing vegetation height, volume, density or coverage.” These sections should be strengthened with a new provision, “does not inhibit the continued growth and maturation of vegetation. Failure to make these changes could result in removal of highly functional trees and shrubs in favor of lesser functioning native ground covers.

- 23.60.928 Definitions “N”: Native vegetation should be defined as species thought to have occurred within the city limits of Seattle in the 18th century AD.

- 23.60.936 Definitions “T”: Tree should be defined as meaning a self-supporting woody plant characterized by one main trunk or, for certain species, multiple trunks, that is recognized as a tree in the nursery and arboricultural industries.

- 23.60.942 Definitions “V”:
 - Vegetation cover should be defined as the total area covered times whatever fraction of areal cover exists based on vertical observation, or estimation.

 - View corridors should be defined as, “an area of a lot that provides a view through the lot from the abutting public right-of-way to the water unobstructed by structures except as allowed by this chapter or by vegetation.

Thank you for your consideration of these comments.

Sincerely,