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DRAFT

December 5, 2018

Nathan Torgelson SDCI Director 700 5th Ave Seattle, WA 98124

RE: Input to Green Factor Director's Rule 2018

Dear Nathan,

The Urban Forestry Commission is pleased to see the continued revisions to Green Factor and appreciates the opportunity to provide input.

Among the proposed changes, the UFC would like to make several observations and recommendations to the score sheet and Director's Rule (DR) to increase its effectiveness.

<u>Minimum soil volume</u> (Rule II – Standards for Green Factor Landscape Elements; B – Plantings; 4 – Trees; e – Soil requirements...;Table A):

• The UFC recommends using higher minimum soil volumes in accordance with <u>James Urban's recommendations</u>.

NOTE: include table with tree size and soil volume recommendations. (Stuart is working on this)

It would be prudent to close a loophole in the current DR (DR 2015-30) by stating soils over 48" in depth do not contribute towards meeting the requirements of providing adequate soil volumes for trees. The volume of soil is more clearly tied to the square footage of planting area required on the <u>GF scoresheet items 4-7</u>. Including this ratio of soil volume to square feet of planting area in the DR would clarify and reinforce the intent. This would eliminate the possibility on sites of achieving required soil volumes for trees by using deep soil wells within undersized planting areas, thus not meeting the intent.

Irrigation (Rule I - General Standards; 5 – Irrigation)

- Establishment of all planting, including drought-tolerant species, requires supplemental water for at least two growing seasons. The UFC recommends increasing the watering requirement to five years for trees and woody shrubs or longer if needed to keep the vegetation alive. for the life of the project, especially as climate change and site conditions impact plantings survival.
- The UFC also would like to point out the current requirement conflicts with certain
 projects trying to achieve LEED status. To gain a point under the Landscape water
 use reduction category for LEED, temporary irrigation systems used for plant
 establishment are only allowed if removed within one year of installation. A LEED
 specialist should be consulted to verify the frequency of this situation and provide
 recommendations on how both requirements can be met.

<u>Structural Soils Systems</u> (Rule II – Standards for Green Factor Landscape Elements; F – Structural Soils Systems):

- Clarify these systems must allow for a continuous feeder root zone between the system and the adjacent planting areas. Credit for these systems should also factor in the volume of soil they provide up to a maximum 48" depth. There are multiple manufacturers of soil cells currently available, with many configurations providing varying levels of soil depth.
- On the Green Factor Score sheet, the UFC recommends providing more incentive towards the planting of conifers. Conifers typically work harder than deciduous trees when it comes to providing year-around ecological services, wildlife habitat, clean air, and runoff reduction; as well as providing a longer service life (long life spans). A potential way for rewarding more conifers in landscape plans could be additional points on the Score Sheet for every tree; i.e. the current draft gives a large tree a factor of 1, specifying a conifer could provide an additional factor of 0.2 thus giving a large conifer a factor of 1.2.

Additional recommendations:

- Change the perception of trees as being a disposable, short-term piece of landscape whose purpose is to 'dress-up' a new project. Urban trees with under appropriate conditions can live many decades.
- Tree preservation of high-value trees such as mature conifers should be given the highest valuation: 1. Smaller trees should have lower values.