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**Joshua Morris** (Position #7 – NGO), Co-Chair  
**Laura Keil** (Position #10 – Get Engaged), Co-Chair  
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**Stuart Niven** (Position #5 – Arborist – ISA) • **Hao Liang** (Position #6 – Landscape Architect – ISA)  
**David Moehring** (Position # 8 – Development) • **Blake Voorhees** (Position # 9 – Realtor)  
**Jessica Hernandez** (Position #11 – Environmental Justice) • **Jessica Jones** (Position # 12 – Public Health)  
**Lia Hall** (Position #13 – Community/Neighborhood)

January 4, 2023

Councilmember Dan Strauss  
Seattle City Council  
600 4th Ave  
Seattle, WA 98104

**RE: Urban Forestry Commission input regarding potential TSP Registration Ordinance amendments**

Dear Councilmember Strauss,

Duwamish Lands (Seattle, WA) – The Urban Forestry Commission (UFC) thanks Chair Strauss and other members of Seattle City Council’s Land Use Committee for their attention to tree service provider registration.

The UFC has reviewed the proposed amendments to the Tree Service Provider Registration Ordinance and offers the following remarks:

1. The UFC urges the Council to seriously consider the definition of “Hedge.” By the City’s own canopy assessment methods, any vegetation greater than eight feet high is considered tree canopy. Most hedges are therefore contributing to our City’s canopy cover, and many are composed of native conifer species that provide exceptional ecosystem services and important urban wildlife habitat. For example, one hedge known to a Commissioner in the Capitol Hill neighborhood, one block north of Cal Anderson Park, is composed of ten Western Redcedars.

The UFC understands that hedge trees serve a particular function and regular pruning or shearing is required, but given the state and trends of our urban forest, removal of hedge trees, if they fall within the significant category, merit the same protections as other trees contributing to our canopy. **Therefore, the UFC would not recommend exempting maintenance or removal of hedge trees from the definition of tree work in the ordinance.** The UFC is also concerned that the loose definition of “hedge” may provide a loophole allowing boundary trees to be removed that are not actually part of a hedge.

The discussion of hedges caused the UFC to reflect on how hedges can be identified early in the development process to avoid any potential disputes over the removal or pruning of hedge trees. The UFC may provide separate recommendations on this at a future time.

2. **The UFC recommends maintaining the current definition of “Major Pruning.”** The proposed change would consider removal of up to 25% of a tree’s foliage bearing area as not reportable. According to ANSI pruning standards, removing more than 25% of a trees’ foliage in a year would be contrary to best practice. Anything above 15% should be considered and reported as major pruning, and anything over 25% in a year would be excessive.

Maintaining the current definition also ensures consistency of our code. For example, permits are required when adjacent property owners wish to prune more than 15% of a street tree’s canopy under SMC 15.43.030.

The UFC does not understand why the branch size threshold is proposed to be raised from 2” to 4” to qualify as major pruning, and recommends retaining the current threshold.

3. The UFC urges the Council to maintain a public notice posting requirement. The UFC acknowledges the weaknesses of the current, on-site public notice requirements, namely that it creates additional travel requirements for tree service providers, which increases traffic and carbon emissions, and can cause difficulties when tree work needs to be delayed or rescheduled.

However, since enforcement of our urban forest protection code relies on community complaints, public notice of legitimate tree work is important. **The UFC urges the Council to create an online public notice system for notification and record tracking.** Require tree service providers to provide notice of commercial tree work two weeks in advance on an online system. This will also help the City collect important data that can inform future management decisions.

The UFC also asks the Council to consider other ways that people can be proactively notified about tree work. Some ideas include:

- Mailers sent to community centers or community groups
- Alerts similar to the Seattle Alerts system
- Ability for folks to sign up for notifications of tree work in their neighborhoods
- Online platforms like Next Door, community groups or neighborhood associations (e.g. Uptown Alliance in Uptown), City Council or elected representative newsletters

The UFC is curious to know how the Land Use Committee (LUC) has engaged with arborists in the field regarding the proposed amendments. Commissioners are happy to meet to discuss any of these recommendations if LUC members are interested in doing so.

Sincerely,



Josh Morris, Co-Chair



Becca Neumann, Co-Chair

CC: CM Tammy Morales, CM Teresa Mosqueda, CM Sara Nelson, CM Alex Pedersen, Yolanda Ho

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