City of Seattle
Urban Forestry Commission

May 12, 2021

Nathan Torgelson, Director
Seattle Department of Construction and Inspections
700 5th Ave
Seattle, WA 98124

RE: Tracking progress of Seattle tree removal and replacement on public and private land.

Objective of this letter of recommendation:

- Comments on results of the recent tree removal tracking undertaken by SDCI
- Considerations for how this data currently may be analyzed and used, and
- Recommendations on the approach SDCI and OSE should consider relative to tree protections.

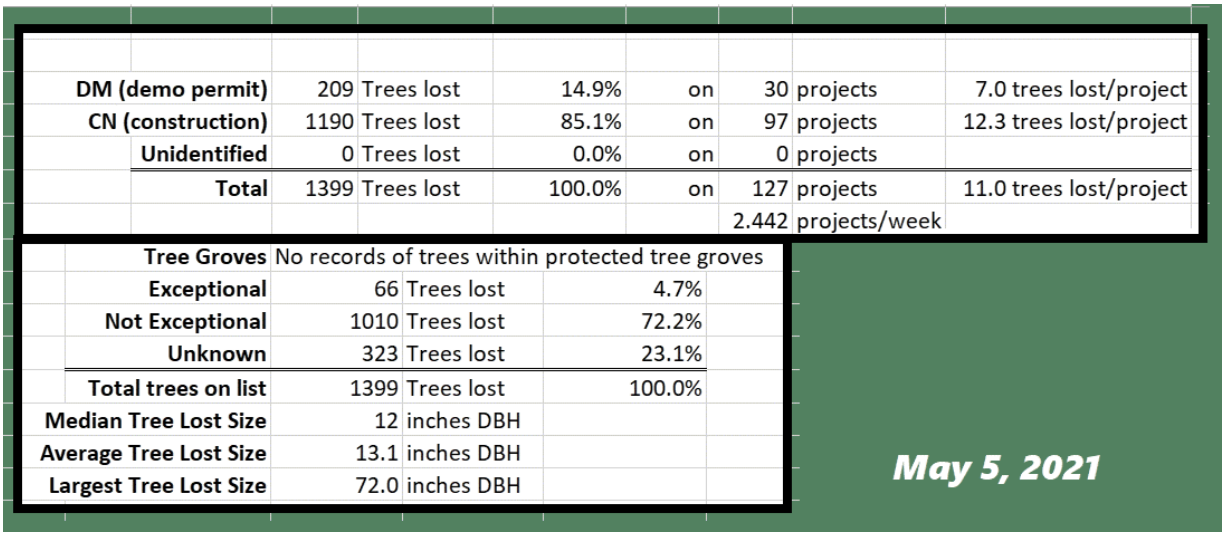
Dear Nathan,

In September 2019, the City Council with the Mayor concurring passed Resolution 31902 regarding tree protection in Seattle. Among other things, the resolution directed the City to explore the feasibility of "*Tracking tree removal and replacement on both public and private land throughout Seattle*." (Section 1.G.).

The Urban Forestry Commission (UFC) appreciates the work SDCI is doing in support of Resolution 31902. In February 2021, the UFC received the second iteration of SDCI's tree removal tracking spreadsheet that included 1,399 removed trees from approximately 97 construction permits and 30 demolition permits, averaging about 11 trees removed per permit (see figure below). However, since more than one construction permit may be issued for a particular address, and many construction permits (-CN) also include demolition (-DM) permits, it was not clear if records indicate unique trees or if there is some repetition within the accounting.

The data indicated the removal of at least 66 Exceptional trees with another 323 removed trees unidentified in terms of their stature, size, or species. The largest tree removed was 72-inches

diameter at standard height (DSH), with the average tree removed being closer to 13-inches DSH.[1] The time period for this data was not included. Forthcoming updates should include when the permit record was initiated so the extent of overall permits is understood.[2]



DM (demo permit)	209	Trees lost	14.9%	on	30	projects	7.0 trees lost/project
CN (construction)	1190	Trees lost	85.1%	on	97	projects	12.3 trees lost/project
Unidentified	0	Trees lost	0.0%	on	0	projects	
Total	1399	Trees lost	100.0%	on	127	projects	11.0 trees lost/project
					2.442	projects/week	

Tree Groves	No records of trees within protected tree groves		
Exceptional	66	Trees lost	4.7%
Not Exceptional	1010	Trees lost	72.2%
Unknown	323	Trees lost	23.1%
Total trees on list	1399	Trees lost	100.0%
Median Tree Lost Size	12	inches DBH	
Average Tree Lost Size	13.1	inches DBH	
Largest Tree Lost Size	72.0	inches DBH	

Analysis of SDCI Tree Removal Data as of February 2, 2021.

Comments on the recent tree removal tracking effort currently undertaken by SDCI
In addition to a summary/dashboard of the data included, the UFC suggests that future iterations of tracking data include the following information:

Ideally, the tracking sheet would have raw data and summary/dashboard reporting that would answer questions such as:

- How many permits were submitted? were removal request accepted or rejected? how many trees remain on the property? was there a tree replacement requirement?
- How many trees were planted and how is the City going to monitor survival through establishment (three to five years) and tree protection as properties change ownership? An idea would be to include tree preservation and establishment requirements on a property's record.

Other information the UFC would like to see in the tracking sheet:

1. **Location information, including address and regional area of Seattle**. This will help clarify neighborhood and regional trends of tree removal and replacement due to development and could inform equitable tree replacement/planting efforts.
2. **Dates the permits were approved**. Temporal context will be needed to establish rates of tree removal and replacement due to development.

[1] Note that the UFC received raw data without the summary as described. There may be some discrepancies in this account. Tree loss tracking should include metadata to provide meaning and context for the data for UFC, Council's Land Use and Neighborhoods Committee, and other users to understand and use the data correctly.
[2] For example, does 127 permits represent a tenth of the average annual permits issued by the department?

3. **Special site conditions related to the permit (such as ECA or incentive zone).**
4. **Reference or link to arborist reports** when applicable to the permit, which includes reasons and documentation for tree removals, trees to be preserved, and photographs of the trees to be removed with their location on the site.
5. **Which trees were removed from groves.**[3] Under the proposed draft Director's Rule 13-2020, groves will continue to be protected even if a component tree is removed, reducing the number of trees in the stand below the threshold number for grove designation. Including grove information in the tracking sheet will help build institutional memory and protection of groves in neighborhoods.
6. Clearly delineating and documenting the reason for tree removal. For example, the reason for the tree removal is currently the same as "status." The rationale why the tree removal was allowed to move forward would be important.
7. Account for trees retained and replanted associated with the permit, if provided or required.[4] Under SMC 25.11.090, all trees 24-inches DSH and greater and all Exceptional trees must be replaced by one or more new trees. Tracking tree replacement and new tree survival is as essential as tracking tree loss.
8. Development site details, including land use, zoning, lot characteristics, etc.
9. Complete data fields for all records. At least 476 records in the current spreadsheet are incomplete, lacking genus name, species name, or DSH information.
10. Information on native species.
11. Metadata as part of the tracking sheet accompanied by summary/dashboard reports.

The UFC will be pleased to consult or further discuss any of these recommendations with SDCI to ensure the City has the data it needs to inform policy decisions.

Considerations for how this data currently may be analyzed and used.
Given Seattle's commitment to address climate change and its goal to increase the urban forest canopy cover to 30-percent in less than two decades, the tracking and inventory of trees retained, removed, and planted on public and private land is essential to assure the City's goals and objectives are achieved. Urban forests should equitably benefit all Seattle communities, not just a few.

Recommendation that the data be made publicly available.

Recommendations on the approach SDCI and OSE should consider relative to tree protections.
The UFC appreciates SDCI providing an easy to use website with canopy cover percentages at the parcel level. Where possible, SDCI should align data fields with SDOT's and other departments' tree tracking systems as well as Accela permit tracking. SDCI and SDOT should file with OSE (and share with the UFC) quarterly reports to the City Council and relevant City

[3] Protected tree groves as defined under the Draft Director's Rule 13-2020. Hazards exclude impacts from earthwork.
[4] Ideally suggest the resulting (30-year) mature canopy volume that planted trees will provide.

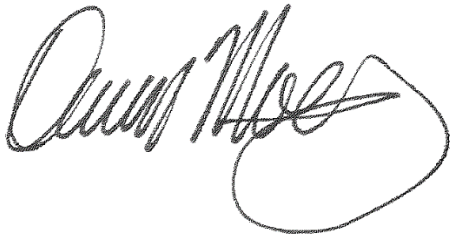
Departments regarding all data collected from its Tree Tracking Worksheet, including trees retained, removed, and planted relative to permits issued. As was shared with City Council in late 2019, Portland Oregon has provided a good tree inventory model for Seattle to consider.[5]

As the tree regulations update continues to take shape, requiring developers/builders to capture the tree data required in the tree tracking sheet for each of their projects would lighten the burden placed on staff. This effort would include identification of the party responsible for recording the data.

The UFC looks forward to this ongoing conversation and requests a timeline for sharing updated data with the UFC.

Sincerely,

Weston Brinkley, Chair



David Moehring

cc: Mayor Jenny A. Durkan, Council President Lorena González, CM Lisa Herbold, CM Debora Juarez, CM Andrew Lewis, CM Tammy Morales, CM Teresa Mosqueda, CM Alex Pedersen, CM Kshama Sawant, CM Dan Strauss, Michelle Caulfield, Urban Forestry Management Team, Urban Forestry Core Team, Christina Ghan, Chase Kitchen, Yolanda Ho, Amanda Hohlfeld

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[5] Portland's Development Services Center includes a Tree Inventory Worksheet and Tree Inventory User Manual to assist in the process of tracking trees removed, retained, and planted: https://www.portland.gov/trees/trees-development/capital-improvement-projects/create-tree-inventory-and-tree-plan