

VIA EMAIL

TO: Shoreline Planning Commission (plancom@shorelinewa.gov), Steve Szafran (sszafran@shorelinewa.gov), and Planning Dir. Rachel Markle (rmarkle@shorelinewa.gov)
cc: City Council (council@shorelinewa.gov)

FROM: Tree Preservation Code Team (TPCT)

DATE: January 27, 2022

RE: 2021 Development Code Amendments – Batch #2 re proposed tree code amendments

The Planning Commission (PC) received Innis Arden Club's (IAC) letter dated Jan. 6, 2022 from Eglick & Whited PLLC. These are TPCT's responses to it.

IAC expressed two main concerns about TPCT in the Jan. 6, 2022 letter. They are TPCT

1. "curated nature of information provided to PC with absence of documented expert environmental information/studies".
2. "amendments are for the most part being driven by a dialogue between staff and the amendment proponents with no outreach by the Dept. to bring into discussion other well-recognized stakeholders who regularly deal with the City on tree-related matters. This includes IAC which owns and manages over 50 acres of treed Reserve Tracts and in addition has authority over residential tracts within Innis Arden."

TPCT response:

The proponents, TPCT are residents of Shoreline who have lived in it for 10 to 42 years. They are property owners who formed a focused interest group on saving the City's trees when it realized that many more trees were being removed for new construction. In June, 2020 when TPCT began looking at the SMC tree codes to submit Development Code Amendment Applications, it read the City's "Comprehensive Plan updated in 2012" and supported its reasons with citations from it and other City guidelines found in "Green Shoreline 20-Year Forest Management Plan of 2012", "Urban Forest Strategic Plan of 2014" and "Climate Impacts and Resiliency Study of 2020".

It is inferred that TPCT is getting preferential treatment from the City and the Planning Department. This is incorrect. TPCT has followed the administrative rules of having its submitted proposed amendments reviewed and studied. All citizens of Shoreline have the same access and IAC is welcome to join the process and discussion.

IAC's concerns:

1. "There is no reference to or discussion of excessive tree densities as a cause of increased tree mortality." In other words, in the instance of tree replacement, it "does not appear to refer to accepted standards for maximum densities (tree spacing) supported by scientific studies. IAC wants the science to show that tree spacing has been addressed and aligned with the City's current EDM for rights-of-way.
2. There is an absence of solar access and it should be a goal to reduce/avoid climate change. Wildfire threat, particularly for the IAC 50 acres of treed Reserve, is being investigated by IAC to create a community wildfire protection plan during period of extreme low humidity in late summer and early fall. This program submitted by national Firewise USA program will extend

outward from homes and provides guidelines for vegetation management to remove and reduce fuels, including tree spacing keyed to terrain slope.

TPCT response to IAC's concerns:

TPCT's amendment #10 refers to Exception 20.50.360(C), tree replacements, specifically when an applicant demonstrates that the project site cannot feasibly accommodate all of the required replacement trees on-site, (underscored portion is in TPCT's proposed amendment). In which case, the Planning Director may allow the payment of a fee in lieu of tree replacement. Presumably, IAC's comment about tree replacement is referring to removal of trees close to homes in Innis Arden. Does IAC want to add to this to Exception 20.50.360(C)? If so, IAC should make a Development Code Application.

TPCT's proposed tree code amendments do not address the absence of solar access in Shoreline. Again, IAC can introduce this subject to the City by proposing it as a Development Code Amendment.

TPCT commends IAC for investigating and developing a program to combat possible wildfires for its Reserve and Innis Arden land tracts. Is this applicable to the City's overall urban tree canopy? If so, perhaps IAC could share its findings and present it to the City Council, or through the City's Tree Board.

IAC wants the following changes:

1. The "landmark tree" and "significant tree" definition decisions based on additional factors, such as growth rate, location suitability (e.g., in terms of tree health and human/property harm risk factors and solar obstruction).
2. A comprehensive review looking at up to date science and current conditions and goals.

TCPT responses to IAC wants:

Does IAC's remark, "Why shouldn't whether a particular tree receives recognition/protection as "significant" not depend explicitly on such real-world factors as type (some literature even considers bamboo a tree), growth rate, location suitability (e.g., in terms of tree health and human property harm risk factors) and solar obstruction?" means that IAC believes the definitions for either Landmark Tree or Significant Tree as proposed by TPCT are inadequate? If IAC objects to the TPCT's proposed definitions for Landmark Tree and Significant Tree, IAC can submit a Development Code Amendment.

TPCT concurs with IAC for a comprehensive review of the latest and "best available" science regarding our City's urban tree canopy. We all have a financial and emotional investment in this City and community and want to make the right decisions for it. TPCT recognizes that science-based information is necessary and desirable. At the same time that TPCT submitted its 2021 Development Code amendments, it also proposed the establishment of an urban forestry advisory panel composed of community members / volunteers with experience and background in urban ecology, urban forestry, urban wildlife, arboriculture and climatology. This citizen-scientist group would become a resource of vetted information about our tree canopy and its management. The public and the City Council and its administrators would be able to ask the group about tree or tree-related questions, regardless if such trees were on private or public land. When given an appropriate opportunity to present this concept to the City Council, it will be explored at a later date.

Thank you for time and attention.