

Archived: Monday, March 21, 2022 10:52:14 AM

From: [Kathleen Russell](#)

Sent: Sunday, March 20, 2022 1:11:49 PM

To: [Keith Scully](#); [Betsy Robertson](#); [Doris McConnell](#); [Laura Mork](#); [Eben Pobee](#); [John Ramsdell](#); [Chris Roberts](#)

Subject: [EXTERNAL] Tree Code Summary for 3-21-22 from TPCT

Sensitivity: Normal

Attachments:

[Tree codes 3-21-22.pdf](#);

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Tree Codes before Council 3-21-22 (see attached summary; handwritten notes and end notes by Tree Preservation Code Team – TPCT)

### Additional information

- **6" Significant Tree Definition: surrounding cities**

The 6" significant tree definition is already part of code in many surrounding cities including Edmonds, Lake Forest Park, Kirkland, Seattle, Redmond, Mountlake Terrace, Issaquah, Lynnwood, Woodinville, Bellingham, and Snohomish. Shoreline already uses the 6" dbh to define significant public trees. This definition allows more trees to reach maturity.

- **Studies provided about 24" dbh trees:** (emailed to Council by William Turner):

- "Recognition of the importance of large-diameter trees in determining global atmospheric carbon stocks has led to management recommendations to conserve existing large-diameter trees and those that will soon reach large diameters." (Lindenmayer et al., 2014; Lutz et al., 2018; Moomaw et al., 2019) <https://www.frontiersin.org/articles/10.3389/ffgc.2020.594274/full>
- Harvesting large trees up to 30" can have major implications for carbon dynamics. This study highlights the importance of protecting established large trees and strengthening the 21-inch rule so that additional carbon is accumulated as 21-30" diameter trees are allowed to continue to grow to their ecological potential, and letting a sufficient number of sub-21 inch trees grow further and become additional large, effective carbon stores. <https://scitechdaily.com/large-trees-dominate-carbon-storage-in-forests-3-of-trees-account-for-42-of-carbon-storage/>

*Summary of information:* In addition to the above studies, there is an important reason to reduce the requirement for a tree permit to 24" dbh in Shoreline. Retaining mature trees will increase climate resiliency. Shoreline's urban native forest is comprised of trees with different size ranges and potential, depending on the species. More of these trees will be protected if we reduce the tree permit measurement to 24," thus contributing to forest diversity. Our Pacific Madrone, a species of concern, is an example. Shore pine, Sitka spruce and Big Leaf Maple are others that would benefit. A tree permit is \$217/per parcel not per tree. Replacement trees are a respected program but are not an immediate solution to climate emergency.

- **Clarification on Code 5 penalties** (response to Staff report and City Manager correspondence):

The \$3000 non-significant and \$9000 significant penalties already appear in tree code for critical areas and buffer areas, for removal or injury beyond rescue, of a protected tree, with the TPCT addition of \$15,000 for a Landmark tree. These penalties *do not* apply city-wide but apply to R-8 thru R-48, MUR-35, and MUR-45 zones, new developments, and do not apply to the single private property owner.

- **Code 6: Cap on properties 1 acre +** (see table submitted by TPCT). We ask Council to approve as an interim guide and direct Staff to study further and return to Council with options.

- We ask Council to remove the 24" amendatory motion from Code 6 and vote to approve that a tree permit is required (fee is currently \$217/parcel) for tree removal of trees 24" dbh and over.

See the following EXCEPTIONS to code as linked below. Scroll down to "Exception" after main code:

- **Code 8:** SMC [Exception 20.50.350 \(B\)\(1\) and \(B\)\(2\)](#); Eliminate Director authority to reduce tree retention. There are other ways offered by Shoreline Municipal Code (SMC) to respond to the example of a tree causing foundation problems, including application for a tree removal permit.

- **Code 9:** SMC [Exception 20.50.360 \(C\)\(b\)](#): Eliminate Director authority to reduce tree replacements. Per code: owner/developer can plant replacement trees on-site or pay the fee in lieu to the City tree fund. Optional to owner/developer: re-design the structure(s).

*Thank you for your review and consideration of these tree codes.*

*Kathleen Russell*

*Tree Preservation Code Team/ Communications*

GROUP C *TREE CODES BEFORE*  
*COUNCIL 3-21-22*

**GROUP C – Tree Amendments**  
**COMMISSION RECOMMENDATION – PROPOSED TREE REGULATION AMENDMENTS:**

STAFF RECOMMENDED AMENDMENTS				
Number	Section	Topic	Submitted By	PC Recommendation
<b>20.20 – Definitions</b>				
C1	20.20.014	1. Critical Root Zone 2. Critical Root Zone, Inner	Tree Preservation Code Team	Approve Approve
<i>C2</i>	20.20.048	1. Tree Canopy 2. Tree, Hazardous 3. Tree, Landmark 4. Tree, Significant <i>6"</i>	Tree Preservation Code Team	Approve Approve Approve <i>Deny</i>
<i>TPCT</i>	<i>C2-4 →</i>			
C3	20.20.050	1. Urban Forest 2. Urban Tree Canopy	Tree Preservation Code Team	Approve Approve
<b>20.50 – General Development Standards</b>				
C4	20.50.290	Tree Policy	Tree Preservation Code Team	Approve
<i>*</i>	<i>C5</i>	General Requirements <i>TPCT → PENALTIES</i>	Tree Preservation Code Team	Approve
	<i>C6</i>	Exemptions from Permit <i>TPCT → TREE CAP ON PROPERTIES 1 ACRE +</i>	Tree Preservation Code Team	<i>Deny</i>
C7	20.50.350	Increases Significant Tree Retention <i>25%</i>	Tree Preservation Code Team	Approve
	<i>C8</i>	<i>ELIMINATE DIRECTOR AUTHORITY TO</i> Exceptions: <i>WAIVE/REDUCE</i> Tree Retention 20.50.350(B)(1)+2 Requirements	Staff	Approve
<i>TPCT →</i>	<i>C9</i>	<i>REDUCE</i> Tree Replacement (C) (B)	Tree Preservation Code Team	<i>Deny</i>
C10	20.50.370	Tree Protection Measures	Tree Preservation Code Team	Approve

TPCT: as originally proposed and now appearing in C6. Please remove from C6 amendment and approve as "Tree removal permit required for trees 24" dbh and over".

Codes apply only to Residential, MUR-35, MUR-45, and Town Center-4.

\*Code 5 penalties apply to R-8 to R-48, MUR-35, MUR-45 new developments not private property owners.