

**From:** [Tom Hinman](#)  
**To:** [Parks and Trails Commission](#); [Planning Commission](#)  
**Cc:** [Becky Frey](#)  
**Subject:** Comments re: Redmond Tree Regulations  
**Date:** Friday, June 12, 2020 4:44:46 PM  
**Attachments:** Final Version of Tree Presentation.ppt

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**Date:** June 12, 2020

**To:** Redmond Planning Commission  
Redmond Parks & Trails Commission

**From:** Tom Hinman, Redmond Citizen

**Subject:** Comments re: Tree Regulations Update Briefing

### Purpose

These comments are provided to amplify and enhance portions of the May 27, 2020 memo regarding tree regulations as provided by staff. They are intended to inform decision makers as Redmond seeks to implement a 40% tree canopy retention strategy for the community.

### Background

As a Redmond citizen concerned about preserving our natural environment and our tree canopy in particular, I have provided public comment on my own behalf and as a member of Sustainable Redmond in numerous contexts since 2011. While all of these are a matter of public record, the most relevant information on the subject was presented to the Redmond City Council on April 2, 2013 by Sustainable Redmond in the form of an intern-driven study of Redmond tree protection data and practices between 2010 and 2013. This pre-dates the 2015-2020 scope of the referenced May, 2020 staff memo. (Please see the archival email string from 2015 with attached Powerpoint presentation.)

## Tree Definitions

As noted in the staff memo, Redmond regulations treat both significant trees and landmark trees. Landmark trees hold “special status” so 100% of the healthy trees in a parcel are to be retained unless an exception is granted. (Neighboring jurisdictions also use the term “heritage” or “specimen” to classify trees of particular value to the community.) In contrast, 65% of Redmond’s “significant trees” can be removed, preserving the 35% regulatory minimum tree retention requirement.

Use of the term “significant” throughout Redmond code language leads to semantic confusion and the comingling of the two classifications of trees when determining the number of trees to be retained. While 35% of the (smaller) significant trees could be viewed as a minimum, lumping of the (larger) landmark trees mandated at 100% retention within that 35% results in major losses of the trees most valuable to the environment. The retention of landmark trees should be addressed separately, perhaps at a number more realistic than 100% but certainly greater than the 35% in practice. Recommendation: Establish a separate tree retention target for landmark trees.

## Tree Data Analysis

Existing sites/SFR tree removal numbers are modest in comparison to proposed developments of larger “green” parcels that affect many more trees. (The Sustainable Redmond study only considered new developments due to their greater environmental impact.) Enforcement and survival monitoring of replacement trees planted in mitigation for removals is also an area where improvement could be needed. (NOTE: Comingling of “significant” and “landmark” trees occurs in Figures 2 & 4 and elsewhere in staff analysis as noted above.)

Take-aways by City staff suggesting opportunities for improvement are acknowledged. They are generally consistent with findings by Sustainable Redmond. Closer attention by intake planners and intended implementation of metrics for “dashboard” reporting are other positive developments.

Development proposals analyzed by Sustainable Redmond for selected projects prior to 2015 will add context to tree loss totals in Figure 5. Figure 4 shows a dismal record of those projects that failed to meet the 35% tree retention requirement. Replacing landmark trees even at a 3:1 ratio does not begin to provide the environmental benefits of mature trees, even if that mitigation was enforced.

## Regulatory Exceptions

A key consideration that merits additional research is the routine approval of exceptions to tree protection regulations. Taken in combination with the comingling of significant and landmark

trees when calculating the 35% minimum tree retention standard, this results in higher loss of landmark trees than would be the case if the 100% standard was applied to the larger trees. Figure 6 should be revised to specify the total number of lost trees by classification as contained in the exemption requests, not just the percentage of requests approved.

Recommendation: As part of the current regulatory update, prescribe broader public knowledge of exception criteria and enhanced transparency of the exception approval process.

### Replacement Tree Fees

The staff memo notes that Redmond charges the lowest in-lieu fee of any surrounding jurisdiction at \$250. This tree fund contribution is a bargain for developers and defers meaningful mitigation for lost trees. Recommendation: Review mitigation enforcement, survival monitoring and in-lieu fee levels for trees removed in Redmond.

### Next Steps

A stakeholder team that includes public members should be formed to assist in moving Redmond to the 40% tree canopy goal. A "Tree Board," one of the components recommended by the Arbor Day Foundation, could serve as a model.

Thank you for your consideration,

Tom Hinman

----- Forwarded Message -----

**From:** Tom Hinman <tom@thinmanassoc.com>

**To:** "mayorcouncil@redmond.gov" <mayorcouncil@redmond.gov>; "cityclerk@redmond.gov" <cityclerk@redmond.gov>

**Cc:** "cbeam@redmond.gov" <cbeam@redmond.gov>; "cjhope@redmond.gov" <cjhope@redmond.gov>; "tkliver@redmond.gov" <tkliver@redmond.gov>

**Sent:** Tue Apr 21 2015 16:07:16 GMT-0700 (Pacific Daylight Time)

**Subject:** Redmond Tree Canopy Presentations

Dear Mayor & Councilmembers -

On April 14, 2015 you received a very informative report on the extent of Redmond's tree canopy, ways that it can be measured, tree protection regs and the role of Green Redmond in restoring and preserving our natural resources. On April 2, 2013, Sustainable Redmond delivered to the Council a very detailed examination of tree retention data that suggested City staff waivers of tree protection provisions contained in planning documents and code provisions were granted routinely.\* This intern-based research project supported our futile recommendations to amend and strengthen those documents and strongly advocated use of

tree canopy metrics as a critical indicator tracking natural resource trends and the environmental services trees provide to our community.

On the occasion of Earth and Arbor Days, it is gratifying to see the City's use of new LIDAR technology to quantify Redmond's touted green reputation and standing as a Tree City. Although we may have some quibbles with specific pieces of the tree canopy data, such as lumping the Watershed Preserve and Farell-McWirtter Park into "urban forest" calculations with attendant skewing of figures, we welcome the new visibility brought to this issue and hope that tree canopy will finally be incorporated into Redmond's Community Indicators as relevant "dashboard" information.

Further, as the Parks, Arts, Recreation, Culture and Conservation (PARCC) Plan is updated through community open houses this May, we hope that it will be an opportunity to emphasize natural resource values in general and tree retention strategies in particular. Citizen surveys, budget polling and the possible levy all place a high priority on our urban forests and parks; a cause that Sustainable Redmond has advocated since its inception. We believe that our residents and employees will reinforce tree protection priorities whenever opportunities are presented as we work together to keep Redmond green.

Regards,  
Tom Hinman  
Sustainable Redmond

\* A video of that 2013 presentation can be found at [http://redmond.granicus.com/MediaPlayer.php?view\\_id=2&clip\\_id=218](http://redmond.granicus.com/MediaPlayer.php?view_id=2&clip_id=218)  
It appears as a 20-minute Item from the Audience beginning 15 minutes into the meeting video. The Powerpoint slides are attached for your convenience.

Click [here](#) to report this email as spam.

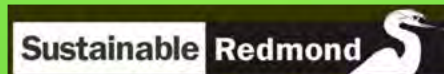


# Tree Protection Practices in Redmond, Washington:

Research to support proposed amendments to the  
Redmond Comprehensive Plan

April 2, 2013

A Natural Resources Management Research Project sponsored by:



Promoting Sustainability by Education,  
Advocacy and Community Events

## Planning Commission Report Recommendations:

- Incomplete and did not consider full public record
- Should be remanded for additional review

Notice Boards – some revisions

Neighborhood Meetings - minimized

Mitigation Plan Benefits – not explained

Technical Committee – underlying questions remain

- Perfunctory consideration of written comments
- Issue Matrix closed summarily without resolving issues

## Additional Information to Quantify Tree Loss Magnitude

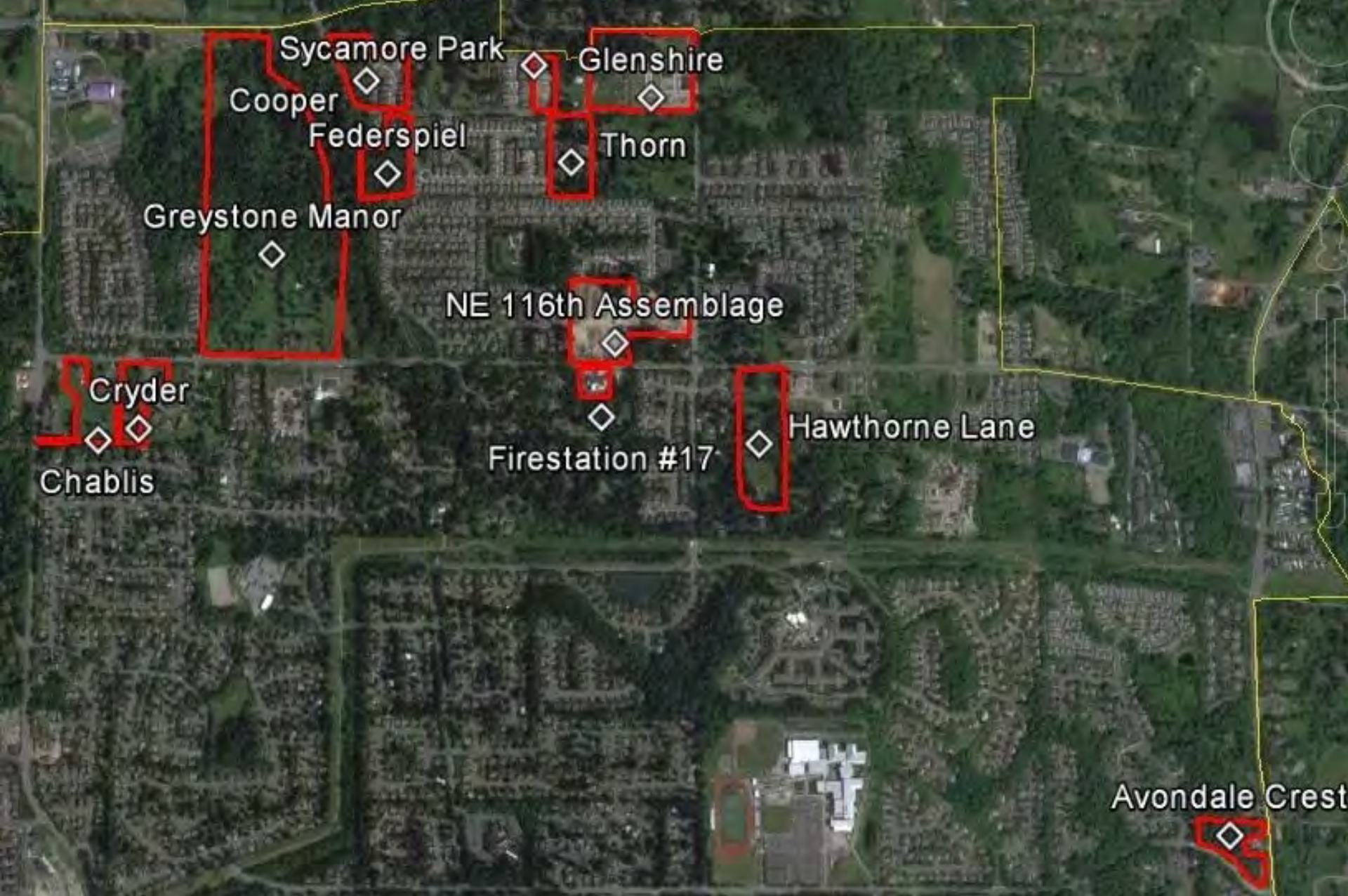


## PROJECT SELECTION CRITERIA:

-2010 to date from:

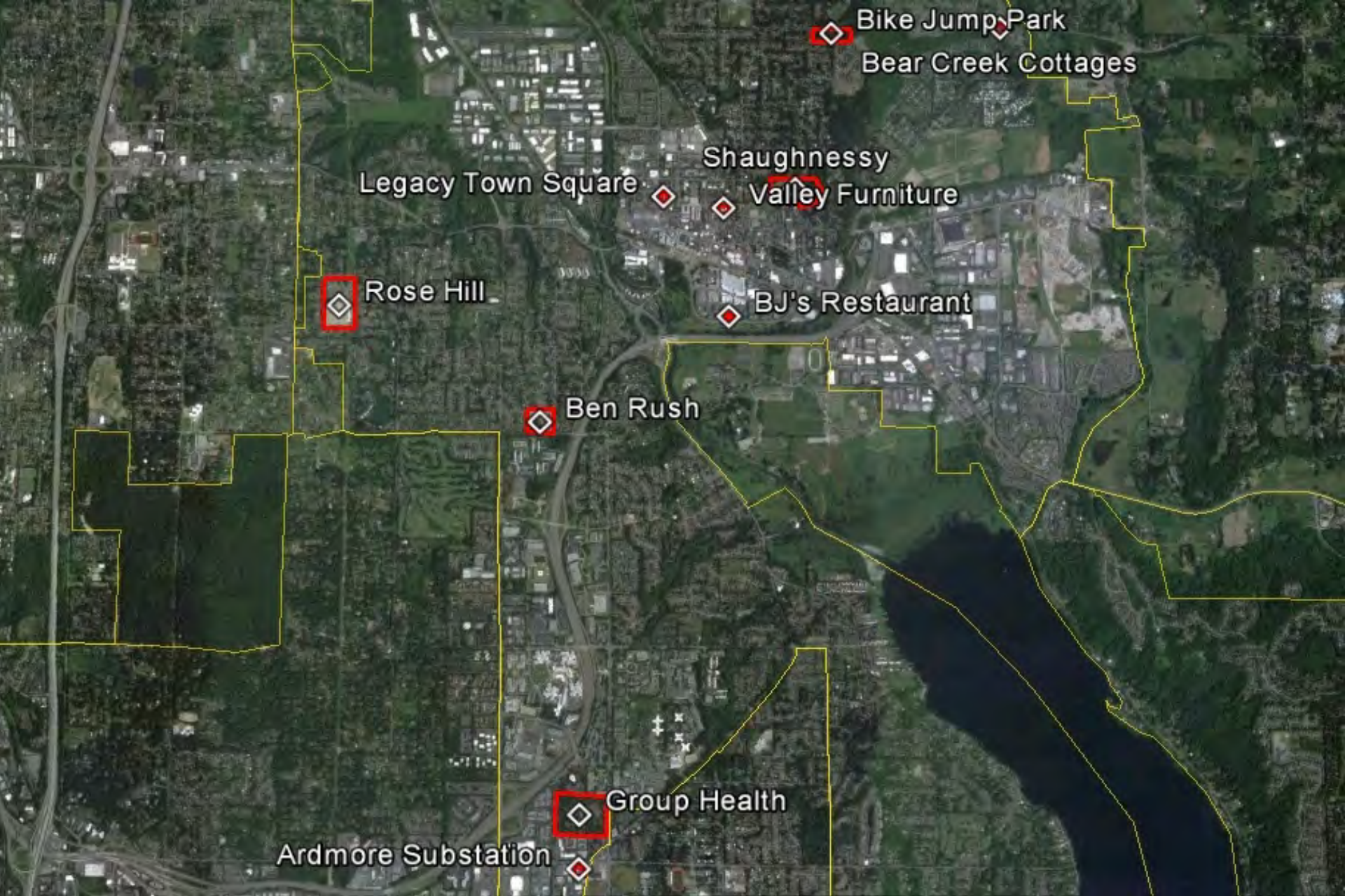
- Current Land Use Action Notices
- Hearing Examiner Archives
- City Ordinances
  
- Reviewed Private, public and utility projects
  
- New Residential or Mixed Use Developments
  
- Few Short Plats
- No Single Family Tree Removal Permits





North Redmond Projects Reviewed





Central & South Redmond Projects Reviewed





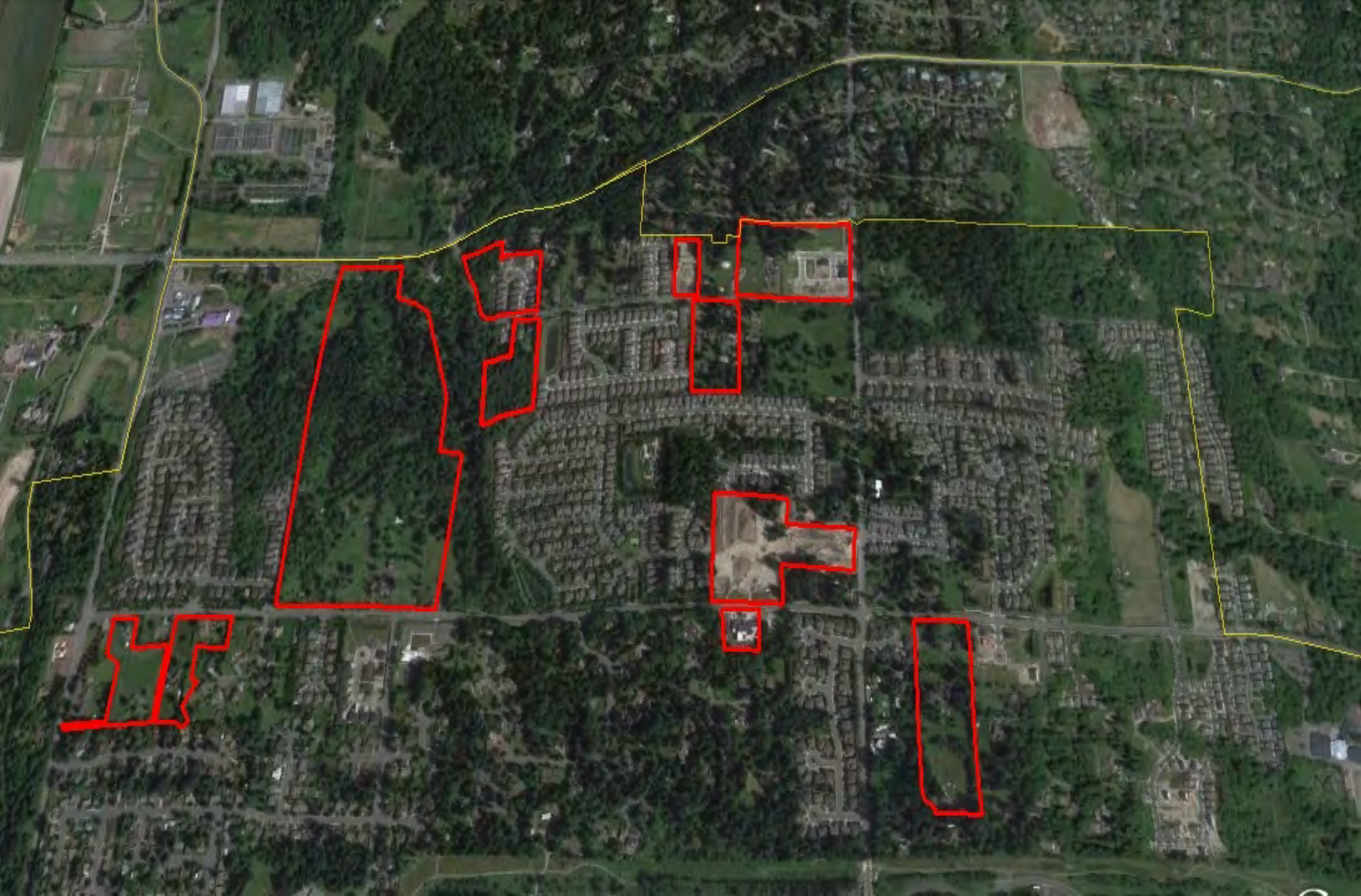
North Redmond with 1936 Aerial Overlay





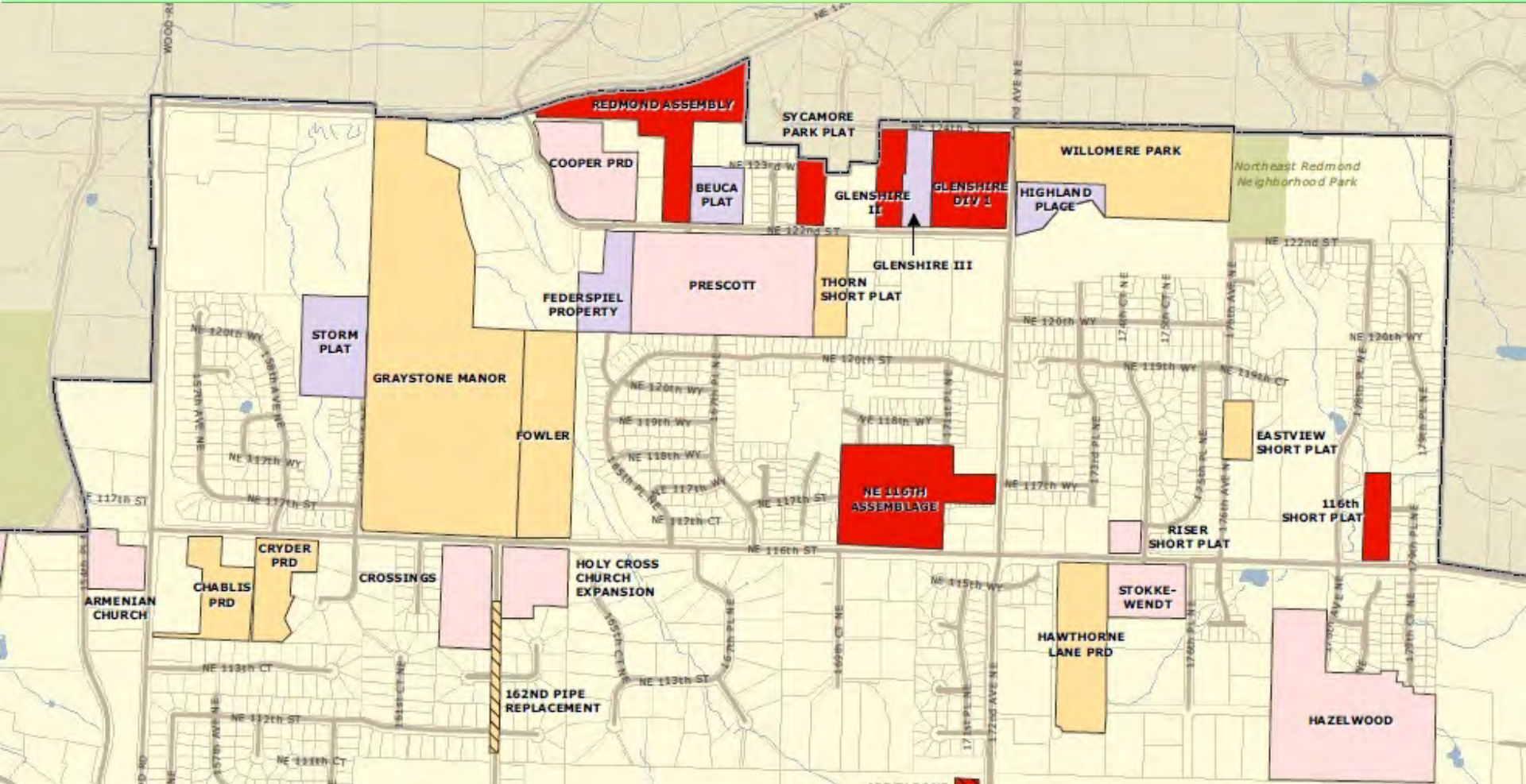
North Redmond Today





North Redmond with Upcoming Projects





## NE 116<sup>th</sup> St. & NE 122<sup>nd</sup> St. Projects

- Purple = Tech Committee Review
- Orange = In Design Phase
- Red = Under Construction
- Pink = Post Construction



## PRELIMINARY FINDINGS BASED ON PROJECT DISTRIBUTION

- Urban centers are largely built out but tree losses in:
  - Redmond Central Connector
  - Former Group Health Campus
- Natural settings in urban centers are disappearing
- Majority of tree loss in North Redmond as it develops
- Some loss of trees in Education Hill, Grass Lawn
- **Analysis of tree canopy loss over time is recommended as a new Community Indicator of environmental quality**

## SCOPE OF TREE PROTECTION RESEARCH:

- Data was drawn from projects just identified
- Findings will understate extent of actual tree loss
  - Assessed a sub-set of Redmond developments
  - Inability to access some arborist reports
  - Does not account for loss of understory, small trees

## TREE REGULATIONS SUMMARY

- Save 35% of “Significant” trees – over 6 inches dbh
- Save 100% of “Landmark” trees – over 30 inches dbh
  - Unhealthy or hazardous trees don’t count in tree retention percentages
- Mitigation by replacement at 1:1 or 3:1 ratio respectively
- Exception process if retention standards cannot be met

# PRELIMINARY TREE PRESERVATION FINDINGS (2010 – 2013)



# PRELIMINARY TREE PRESERVATION FINDINGS (2010 – 2013)



## PRELIMINARY FINDINGS BASED ON TREE PRESERVATION STATISTICS

- Private developments tend to be closer to 35% standard than public sector projects, which raise the average retained percentage
- Only one project saved 100% of landmark trees
- Request and approval of “exceptions” is routine in practice
- Inconsistencies exist among developers/arborists in calculating tree percentages by co-mingling of significant and landmark trees
- Total trees, healthy vs significant trees, on-site vs arborist evaluated trees, Native Growth Protection Area allocations add complexity to analysis by inconsistency
- “Impacted” tree status, dripline criteria add ambiguity



## ENVIRONMENTAL SERVICES RESEARCH:

- Data is based on previous statistical information
- Findings are calculated by accessing a national tree benefits data base endorsed by the Arbor Day Foundation with inputs specifying tree species, dbh, and number on a project site
- Environmental services output is estimate of annual:
  - Stormwater retained & treated (\$ value and gal/year)
  - Carbon sequestered (\$ value and pounds/year)
  - Air quality improved (\$ value)
- Data is sub-totaled and displayed as either Significant or Landmark trees lost at a given development project

# ENVIRONMENTAL SERVICES LOST (2010 – 2013)

	Tree	Total Trees	Removed By	Value By Size	Stormwater	Stormwater	CO <sup>2</sup> (\$)	CO <sup>2</sup> (lbs)	Air Quality (\$)	Total Value Lost (\$)
			Size	(\$)	(\$)	(gal)				
North Redmond	Cooper	304								6340
	Significant		175	5993	5472	196923	161	48106	360	
	Landmark		3	347	323	3871	7	2175	17	
Cryder	Significant	59	28	802	737	26525	18	5331	47	942
	Landmark		1	140	131	4721	2	715	6	
Federspiel	Significant	248	155	5073	4593	165274	159	47475	321	5313
	Landmark		2	240	225	8087	5	1346	11	
Firestation 17	Significant	64	34	1149	1046	37630	36	10829	67	2144
	Landmark		7	995	945	34004	10	445	40	
Greystone	Significant	1757	926	37012	34030	1224681	954	284393	2028	67055
	Landmark		205	30043	28544	1027112	351	104720	1148	
Hawthorne Lane	Significant	123	53	2397	2220	79887	49	14628	128	2521
	Landmark		1	124	117	4215	2	523	5	
NE 116 <sup>th</sup> Assemblage	Significant	612	345	14044	13010	468138	284	84991	751	19579
	Landmark		39	5535	5253	189022	72	21478	210	
Sycamore	Significant	24	6	314	291	10470	7	1963	17	443
	Landmark		1	129	122	4373	1	334	6	
Thorne	Significant	66	16	800	747	26891	14	4125	39	1240
	Landmark		2	440	418	15030	6	1751	16	

# ENVIRONMENTAL SERVICES LOST (2010 – 2013)

		Total Trees	Tree Removed By Size	Value By Size (\$)	Stormwater (\$)	Stormwater (gal)	CO <sup>2</sup> (\$)	CO <sup>2</sup> (lbs)	Air Quality (\$)	Total Value Lost (\$)
<b>Education Hill</b>										
Avondale Crest		337								5752
Significant			131	5433	4992	179626	134	40006	308	
Landmark			2	319	305	5492	2	706	12	
Bear Creek Cottages		54								599
Significant			11	599	558	20093	11	3366	30	
Landmark			-	-	-	-	-	-	-	
Bike Jump Park		197								1935
Significant			31	1278	1176	42301	31	9292	72	
Landmark			5	657	619	4456	10	3085	27	
Shaughnessey Heights		481								11513
Significant			203	7939	7264	261398	212	63424	463	
Landmark			26	3574	3384	121757	45	13557	145	
<b>Downtown</b>										
Redmond Connector		152								1914
Significant			59	1622	1462	52592	57	16939	104	
Landmark			3	292	269	9671	7	2194	16	
<b>Overlake</b>										
Group Health										51205
Significant			985	42271	39052	1405250	912	273165	2307	
Landmark			65	8934	8476	305017	119	35630	339	
<b>Totals:</b>			<b>1521</b>	<b>72918</b>	<b>67557</b>	<b>2407653</b>	<b>1540</b>	<b>461364</b>	<b>3823</b>	<b>72918</b>
<b>Grand Totals:</b>			<b>3521</b>	<b>178495</b>	<b>165781</b>	<b>5934506</b>	<b>3678</b>	<b>1096692</b>	<b>9040</b>	<b>178495</b>

## PRELIMINARY FINDINGS BASED ON ENVIRONMENTAL SERVICES RESEARCH

- Significant economic contribution of lost trees could have reduced future stormwater infrastructure needs like vaults
- Carbon sequestration (green house gas reduction) and air quality losses are also significant to broader community
- Near-term mitigation plantings are no match for environmental services lost, even if no net tree loss
- In-lieu tree fund contribution of \$250/tree is a bargain for developers
- Loss of community character cannot be quantified

## OVERALL COMMENTS ON REDMOND TREE PRESERVATION PRACTICES

- Findings above are not directed at any individual developer or project; a look across the community
- Sometimes the developer is more innovative than City staff
- Precedent of past exception approvals means less stringent reviews over time...become “routine”
- Extent of tree preservation can be blurred in applications due to inconsistent presentations in the past
- Public notice and engagement is generally minimal and not enthusiastic unless appeals or legal action is involved



## OVERALL COMMENTS ON REDMOND REDMOND TREE & DEVELOPMENT POLICIES

- Who determines if a project meets the Neighborhood Vision?
- How does the value of mitigation benefit the impacted neighborhood or get articulated to seek community inputs?
- A corridor or neighborhood-based approval process is preferable to ad hoc, project-by-project permitting...what is a “conservation overlay” and how is it applied in North Redmond?
- Process improvements proposed by these Comprehensive Plan amendments deserve serious reconsideration

## QUESTIONS?

### Sustainable Redmond Natural Resources Management Research Team:

#### RESEARCH INTERNS:

Mark Biehl: BA in Economics & Environmental Studies  
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Blake Garland: BA in Environmental Studies with Geography minor  
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Margaret Yale: BS in Biology & Environmental Studies  
University of Wisconsin, Madison

#### ADVISORS

Ella Elman: Environmental Services  
Susan Wilkins: Public Records Research

#### PROJECT MANAGER

Tom Hinman for Sustainable Redmond

