

From: [Tom Hinman](#)
To: [Parks and Trails Commission](#); [Planning Commission](#)
Cc: [Becky Frey](#); [Jeff Aken](#); [Gary Smith \(City Volunteer\)](#)
Subject: Re: Comments re: Redmond Tree Regulations
Date: Friday, July 3, 2020 12:21:48 PM
Attachments: Final Version of Tree Presentation.ppt

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Planning Commissioners and staff....

Please accept this email I provided on June 12th as public testimony for the July 8th public hearing regarding Redmond's Tree Canopy. Although submitted nearly a month ago, I do not find a copy of these comments in documents provided by staff for consideration of this agenda item.

Please confirm inclusion of these comments in the materials for July 8th.

Thank you,
Tom Hinman

On Friday, June 12, 2020, 4:32:48 PM PDT, Tom Hinman <tom@thinmanassoc.com> wrote:

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-McWirter 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
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.

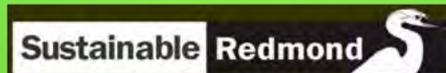


Tree Protection Practices in Redmond, Washington:

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:

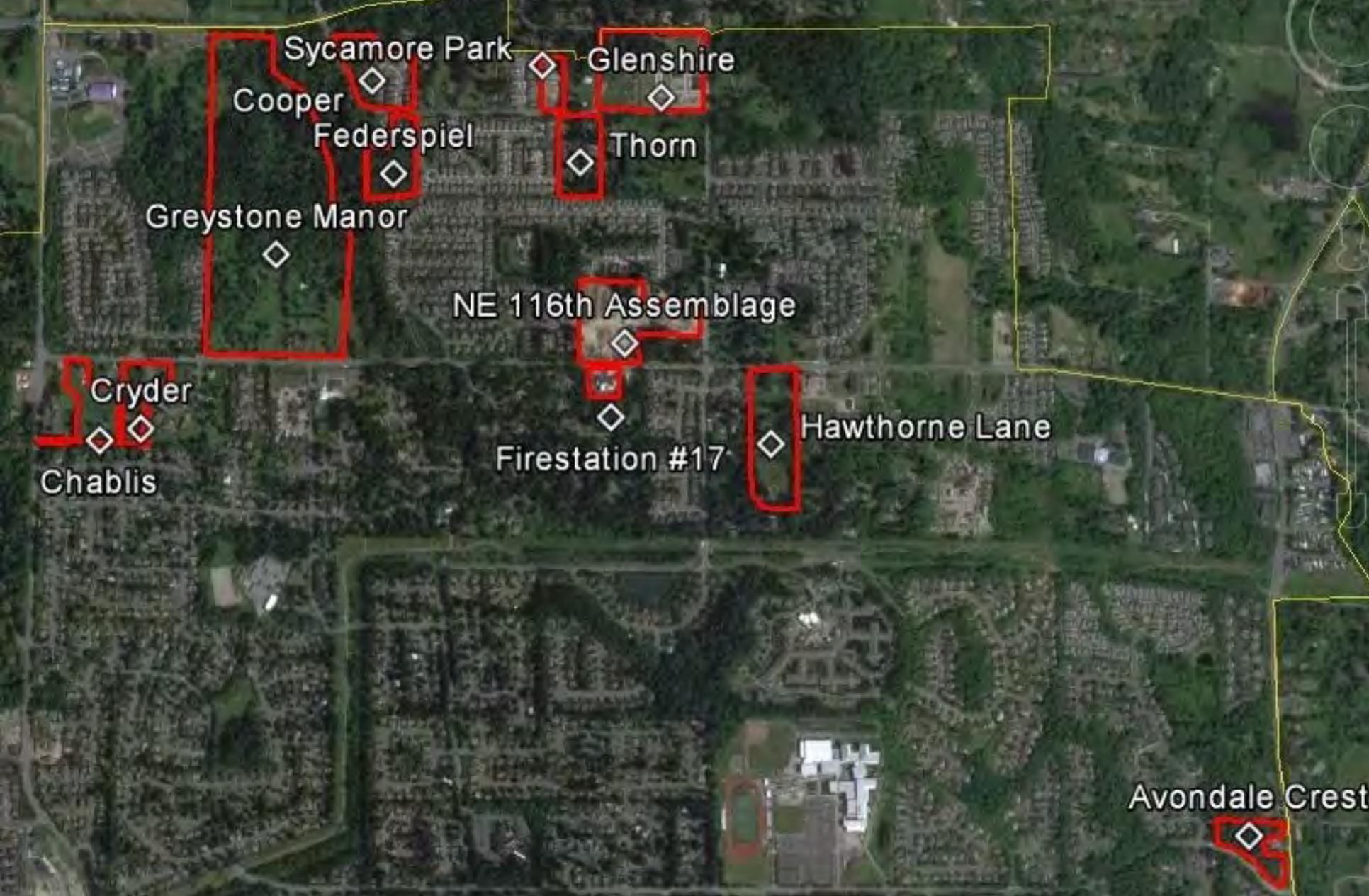
-2010 to date from:

- Current Land Use Action Notices
- Hearing Examiner Archives
- City Ordinances

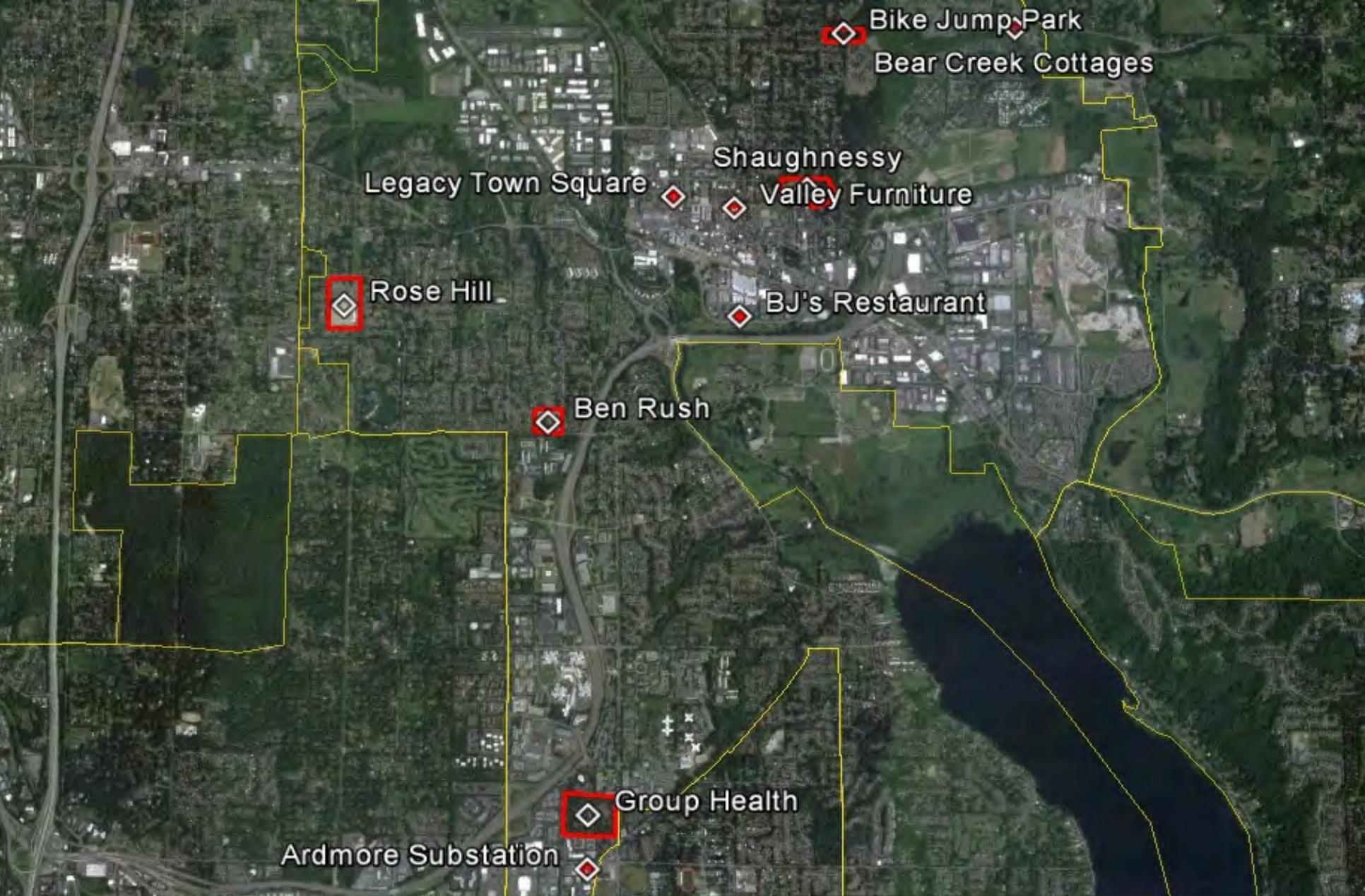
- Reviewed Private, public and utility projects

- New Residential or Mixed Use Developments

- Few Short Plats
- No Single Family Tree Removal Permits



North Redmond Projects Reviewed



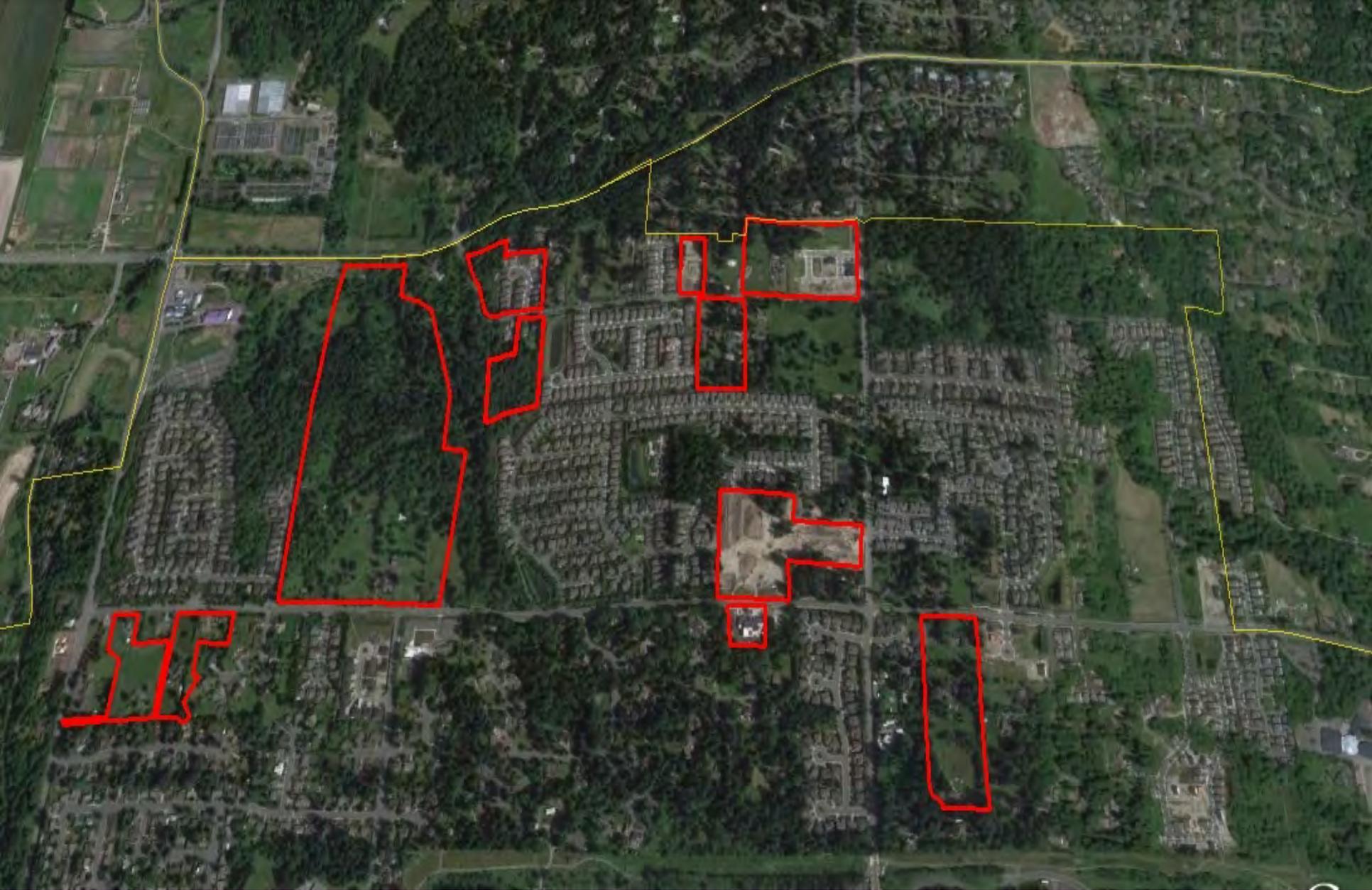
Central & South Redmond Projects Reviewed



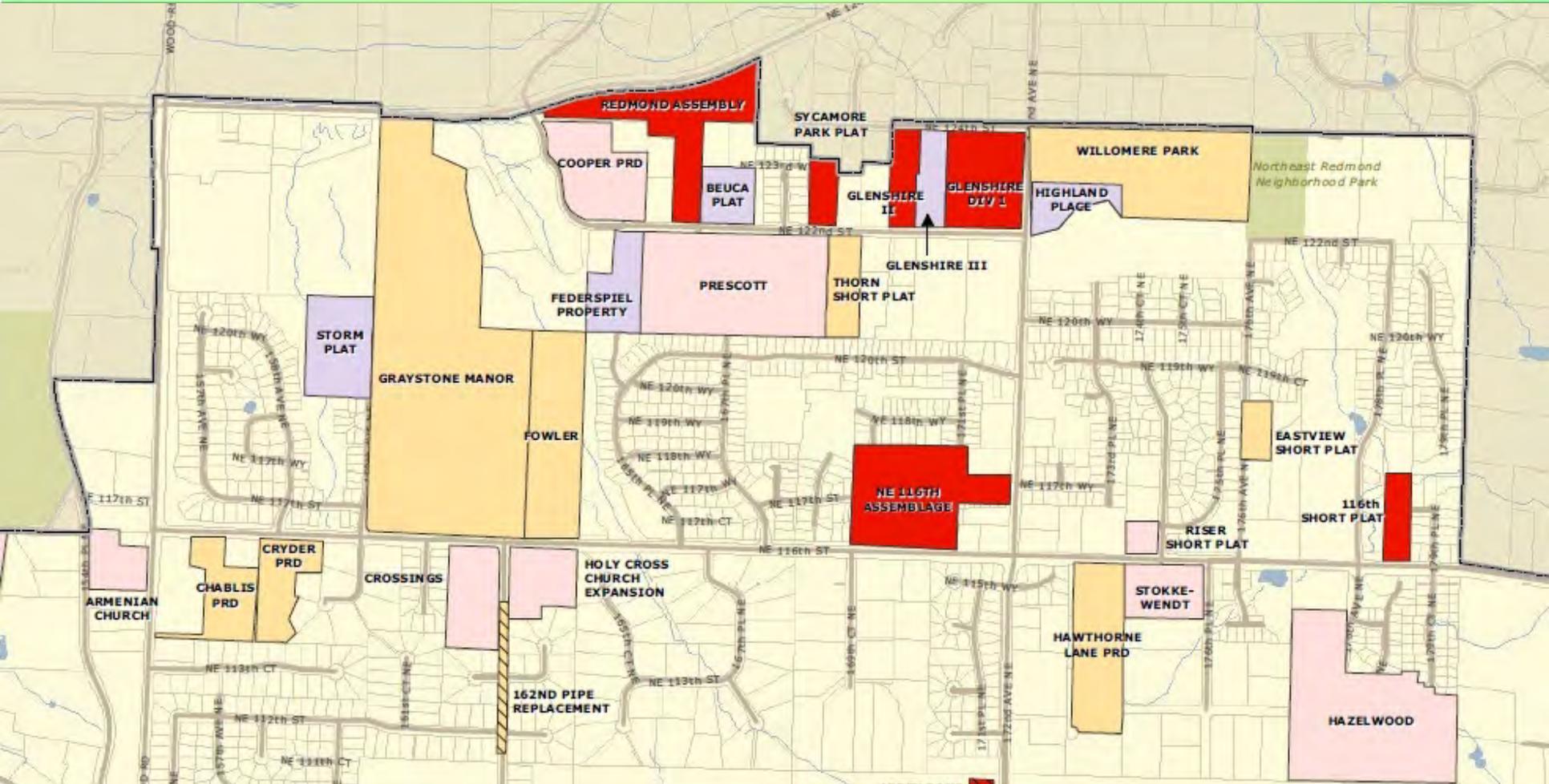
North Redmond with 1936 Aerial Overlay



North Redmond Today



North Redmond with Upcoming Projects



NE 116th St. & NE 122nd 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 ² (\$)	CO ² (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		59								942
	Significant		28	802	737	26525	18	5331	47	
	Landmark		1	140	131	4721	2	715	6	
Federspiel		248								5313
	Significant		155	5073	4593	165274	159	47475	321	
	Landmark		2	240	225	8087	5	1346	11	
Firestation 17		64								2144
	Significant		34	1149	1046	37630	36	10829	67	
	Landmark		7	995	945	34004	10	445	40	
Greystone		1757								67055
	Significant		926	37012	34030	1224681	954	284393	2028	
	Landmark		205	30043	28544	1027112	351	104720	1148	
Hawthorne Lane		123								2521
	Significant		53	2397	2220	79887	49	14628	128	
	Landmark		1	124	117	4215	2	523	5	
NE 116 th Assemblage		612								19579
	Significant		345	14044	13010	468138	284	84991	751	
	Landmark		39	5535	5253	189022	72	21478	210	
Sycamore		24								443
	Significant		6	314	291	10470	7	1963	17	
	Landmark		1	129	122	4373	1	334	6	
Thorne		66								1240
	Significant		16	800	747	26891	14	4125	39	
	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 ² (\$)	CO ² (lbs)	Air Quality (\$)	Total Value Lost (\$)
Education Hill									
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	
Downtown									
Redmond Connector	152								1914
Significant		59	1622	1462	52592	57	16939	104	
Landmark		3	292	269	9671	7	2194	16	
Overlake									
Group Health									51205
Significant		985	42271	39052	1405250	912	273165	2307	
Landmark		65	8934	8476	305017	119	35630	339	
Totals:		1521	72918	67557	2407653	1540	461364	3823	72918
Grand Totals:		3521	178495	165781	5934506	3678	1096692	9040	178495

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
Western Washington University, Huxley College

Blake Garland: BA in Environmental Studies with Geography minor
San Jose State University

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



From: [Tom Hinman](#)
To: [Planning Commission](#); [Becky Frey](#)
Cc: [Parks and Trails Commission](#); [Jeff Aken](#); [Gary Smith \(City Volunteer\)](#); [Cathy Beam](#)
Subject: Comments for Planning Commission Public Hearing - 7/22
Date: Tuesday, July 21, 2020 2:26:17 PM

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Public Hearing Comments for Planning Commission Meeting of July 22, 2020

Commissioners –

These written comments are provided in lieu of on-line oral testimony as you continue your review of the Tree Canopy Strategic Plan. They follow on my earlier emailed comments of July 3, 2020 on the same topic.

First, let me clarify the intent of the 2013 vintage attachment to my earlier submission. I wished to demonstrate how long these conversations have been on-going. They were presented to the Planning Commission then considering a Comp Plan Amendment proposed by Sustainable Redmond in the aftermath of the Group Health tree removal process. (The first few slides were addressed to that reviewing body at the time.) By including projects since 2010, the numbers presented in the Powerpoint give more historical insights than presented in the current staff memo. The findings also address continued concerns about the lenient granting of exceptions to tree retention regulations.

Tree Definitions – In my memo of June 12/email of July 3, I addressed the confusion arising from the use of the same term – “significant” – referring to both the overall tree retention goal and to those tree specimens over 6 inches dbh. I recommended establishment of a separate tree retention target for landmark trees. See if this suggestion is any clearer.

Significant tree – tree for which a replacement tree (or trees) must be planted as mitigation for tree loss and to attain tree canopy goals.

Mature tree – (currently categorized as “significant” tree) Tree over 6 inches dbh for which a 1-to-1 replacement must be planted per current regulations. A minimum of 35% of mature trees must be retained, which corresponds to current regulations. Increasing the minimum to 40% would be consistent with the Tree Canopy Strategic Plan target.

Landmark tree – as currently defined, a tree over 30 inches dbh for which a 3-to-1 replacement must be planted per current regulations. Current regulations state that 100% of landmark trees must be retained unless an exception is granted in the permitting process. This high standard is rarely met and may be impractical in practice. Accordingly, I recommend that a minimum of 65% of landmark trees must be retained and that more stringent exception criteria be instituted in compensation for the reduction from 100%.

In lieu fees, mitigation enforcement and survival monitoring – I previously recommended review of these items for trees removed in Redmond. Regarding in-lieu fees, I would suggest \$500 for a Mature tree and at least \$750 for Landmark tree mitigation. (Even these values seem modest but are an improvement over the current fee structure.) Further, I recommend that the quarterly tree loss report being proposed by staff include the amount received as in-lieu fees and any relevant findings regarding mitigation enforcement, survival rates of plant stock by project, and corrective actions taken if warranted.

“No net loss” – The statement regarding **NE113** *Maintain no net loss of significant trees within the city over the long term* is necessary but imprecise. What is “long term?” I would suggest that it should be less than a 10 year period but should be informed by findings resulting from the “quarterly metrics and rigid reporting requirements” proposed by staff.

Issue Matrix Items #5 & 7 – I concur that the regulatory improvements being recommended need to be addressed in a Planning context (as is apparently in progress) rather than by Parks. I would be pleased to participate in that process.

Thank you for your consideration,
Tom Hinman

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