

#D-109 TREE REMOVAL

SUPPLEMENTAL STAFF REPORT

SUMMARY: This Supplemental Staff Report provides responses to issues that were raised at a Planning Commission meeting regarding amendments to the Renton Municipal Code Development Regulations (Title IV). It also includes additional information that staff has identified as being necessary to include in the analysis for amendments.

General Description

Staff has observed that current regulations related to tree removal and land clearing is insufficient. The current regulations allow individual property owners to remove numerous trees without City oversight, provides insufficient disincentives for landowners to not violate the standards or to prevent developers from clearing an entire site and planting replacement trees instead of retaining existing trees.

The following summarized key revisions to RMC 4-11-200, Definitions T, and RMC 4-4-130, Tree Retention and Land Clearing Regulations, are proposed:

- In order to administer new and/or revised standards, the definitions of “significant tree,” “landmark tree,” “protected tree,” “tree topping,” and “tree protection tract,” were added and the definitions of “tree removal” and “tree trimming” were revised.

4-11-200 DEFINITIONS T:

TREE: A self-supporting woody plant characterized by one main trunk having a caliper of two inches (2") or greater, or, for certain species, a multi-stemmed trunk system with a definitely formed crown, with a potential minimum height of ten feet (10') at maturity.

Any trees listed on the Complete King County Weed List shall not qualify as a tree.

A. Tree, Dangerous: Any tree that has been certified as dead, terminally diseased, damaged, or otherwise dangerous to persons or property by a professional forester, licensed landscape architect, or certified arborist.

B. Tree, Landmark: A tree with a caliper of thirty inches (30") or greater.

C. Tree, Protected: A significant tree identified to be retained as a condition of approval for a Land Development Permit.

D. Tree, Significant: A tree with a caliper of at least six inches (6"), or an alder or cottonwood tree with a caliper of at least eight inches (8"). Trees qualified as dangerous

shall not be considered significant. Trees planted within the most recent ten (10) years shall qualify as significant trees, regardless of the actual caliper.

TREE PROTECTION TRACT: A restrictive area where all retained and/or replacement trees are protected, and development, alteration, or disturbance within the tract, or tree removal, is prohibited without the explicit approval of the City. Tree protection tracts may contribute to required open space, if applicable.

TREE REMOVAL: The removal of a tree, through either direct or indirect actions, including but not limited to: (1) clearing, damaging or poisoning resulting in a dangerous tree; (2) removal of more than forty percent (40%) of the live crown; or (3) damage to roots or trunk that is likely to destroy the tree's structural integrity. ~~The actual removal of the aboveground plant material of a tree through chemical, manual or mechanical methods.~~

TREE TOPPING: The act of removing whole tops of trees, or large branches and/or trunks from the tops of trees, and leaving stubs or lateral branches that result in the disfigurement of the canopy. Tree topping is considered to be tree removal. Other common names for the practice include hat-racking, lopping, heading, rounding over, and tipping.

TREE TRIMMING: The ~~intentional removal of a tree's branches~~ ~~pruning of the tree~~ in order to reduce the live canopy of the tree ~~by~~ ~~provided that~~ no more than forty percent (40%) ~~of the live crown shall be removed~~ during any ~~pruning~~ any consecutive twelve (12) months. Trimming more than forty percent (40%) of a tree's canopy during any consecutive twelve (12) months shall be considered "tree topping."

- In an effort to prevent the continual removal of trees that eventually can result in a lot void of any trees, staff recommends revising the rate at which trees can be lawfully removed and establishing a minimum number of trees (tree density) that will be required for each residential lot. Below are the recommended allowed quantity and frequency of tree removal from property, as well as the minimum tree density:

Minor Tree Removal Activities: Except as provided in subsection ~~D2~~ ~~D3~~ of this Section, Restrictions for Critical Areas – General, of this Section, tree removal of trees and associated use of mechanical equipment is permitted at the following rates specified within the table, provided: as follows:

- a. There is not an active land development application for the site; and
- b. The required minimum tree density for the type of development, as specified in subsection C9e, Minimum Tree Density, of this Section is maintained, or replacement trees are planted in conformance with subsection H1d, Replacement Requirements, of this Section; and
- c. The trees proposed for removal are not protected trees; and
- d. The tree is not a landmark tree.

| <u>Lot Size</u> | <u>Maximum number of significant trees* allowed to be removed in any twelve (12) month period</u> | <u>Maximum number of significant trees* allowed to be removed in five (5) years</u> |
|---|---|---|
| <u>Lots up to 10,000 sq. ft.</u> | <u>2</u> | <u>4</u> |
| <u>Lots 10,001 to 20,000 sq. ft.</u> | <u>3</u> | <u>6</u> |
| <u>Lots 20,001 sq. ft. or greater</u> | <u>6</u> | <u>12</u> |
| <u>*Except landmark trees (greater than 30-inch caliper) shall not be removed without a Routine Vegetation Management Permit.</u> | | |

~~a. No more than three (3) trees are removed in any twelve (12) month period from a property under thirty five thousand (35,000) square feet in size; and~~

~~b. No more than six (6) trees are removed in any twelve (12) month period from a property thirty five thousand (35,000) square feet and greater in size.~~

e. Minimum Tree Density: A minimum tree density shall be maintained on each residentially developed lot, as specified in the table below. Property owners are responsible for maintaining these trees in a healthy condition. The tree density may consist of existing trees, replacement trees, trees required per RMC 4-4-070, Landscaping (if planted within the lot), or a combination. If the number of trees required

to be retained includes a fraction of a tree, any amount equal to or greater than one-half (1/2) shall be rounded up.

| <u>Type of Residential Development</u> | <u>Minimum Tree Density</u> |
|--|--|
| <u>Multifamily Development (attached dwellings)</u> | <u>4 significant trees² per 5,000 sq. ft.¹</u> |
| <u>Single-family development (detached dwellings)</u> | <u>2 significant trees² per 5,000 sq.ft.¹</u> |
| <p><u>¹Excludes trees within critical areas and their buffers, as well as current or proposed public rights-of-way.</u></p> <p><u>²Or their equivalent size in caliper inches.</u></p> | |

- Added tree topping and the removal of landmark trees to the list of prohibited activities. A Routine Vegetation Management Permit or approved land development permit may allow the removal of the landmark tree.

D. PROHIBITED ACTIVITIES:

5. Tree Topping: Tree topping shall be prohibited unless the tree has been approved for removal.

6. Removal of Landmark Tree: The removal of a landmark tree (a tree with a caliper of thirty inches (30”) or greater) is prohibited without the explicit approval to remove the type of tree via a Routine Vegetation Management Permit.

Removal of Landmark Tree: A Land Development Permit or Routine Vegetation Management Permit shall be required to remove a landmark tree, as defined by RMC 4-11-200, from any property. Replacement trees are required if the minimum tree density for the subject property is not maintained upon removal of the tree. Removal of a landmark tree may be granted for situations where:

- i. The tree is determined to be a dangerous tree; or

- ii. The tree is causing obvious physical damage to structures including but not limited to building foundations, driveways or parking lots. Routine maintenance of roofs that is required due to leaf fall does not constitute obvious physical damage to structures; or
 - iii. Removal of tree(s) providing solar access to buildings incorporating active solar devices. Windows are solar devices only when they are south-facing and include special storage elements to distribute heat energy; or
 - iv. The Administrator determines the removal is necessary to achieve another stated purpose or goal of Title IV, Development Regulations.
- Currently, a percentage of existing trees are required to be retained based on the applicable zoning district, but there are no standards in place to ensure that those retained trees (or any authorized replacement trees) are protected after the final plat is recorded. Generally, retained trees are usually located within only a certain number lots of a subdivision. The new lot owners are usually unaware that the trees on their property were required to be retained for the benefit of the subdivision; consequently, staff has observed that individual lot owners have removed these trees. CED staff recognizes that these lot owners are unaware of their responsibilities and furthermore, that having only a portion of lots encumbered with “protected trees” is inequitable. Therefore, staff’s recommendation is to specify that developers need to satisfy each lot’s required minimum tree density, and that all other trees required to be retained should be held within a tract that is owned by the HOA or that each lot owner has an equal and undivided interest in the tract.
 - The performance standards for land development / building permits is proposed to be revised by:
 - Specifying that only significant trees (6” inches of caliper or greater) qualify for retention;
 - Specifying that trees required to be retained (or approved replacement trees) are to satisfy each lot’s minimum tree density, but that all other trees not necessary to provide a lot with the minimum tree density are to be preserved in a tree protection tract;
 - Establishing priorities for retention of certain trees;
 - Increasing the percentage of trees to retain on-site from ten percent (10%) to twenty percent (20%) for R-10, R-14, RM-F, RM-T, RM-U and RMH zoning districts, and from five percent (5%) to ten percent (10%) in all other zones (excluding the RC, R-1, R-4 and R-8 zones, which are proposed to remain at thirty percent (30%));
 - Specified that required landscaping may constitute 50% of the required replacement trees; and
 - Established a provision to pay a fee in lieu of replacing trees when it is determined by the Administrator that site constraints preclude the planting of replacement trees. Fees would go to the City’s Urban Forestry Program.

H. PERFORMANCE STANDARDS FOR LAND DEVELOPMENT/BUILDING PERMITS:

1. Protected Trees – Retention Required: Significant trees required to be retained per subsection H1b, Percentage of Tree Retention Based on Zones, of this Section are considered “protected trees.” Protected trees may contribute to each residential lot’s required minimum tree density, but any trees that are superfluous to an individual lot’s minimum tree density shall not contribute to the total number of trees that are required to be retained for the land development permit. Protected trees that do not contribute to a lot’s required minimum tree density shall be held in perpetuity within a tree preservation tract per subsection H2, Tree Protection Tract, of this Section; protected trees on an individual lot are the responsibility of the lot owner and may only be removed if in compliance with RMC 4-4-130.C, Allowed Tree Removal Activities. Significant trees shall be retained as follows:

a. Priority of Tree Retention Requirements: Significant trees shall be retained in the following priority order:

| | |
|-----------------------|--|
| <u>Priority One</u> | i. <u>Landmark trees;</u> |
| | ii. <u>Significant trees that form a continuous canopy;</u> |
| | iii. <u>Significant trees on slopes greater than twenty percent (20%);</u> |
| | iv. <u>Significant trees adjacent to critical areas and their associated buffers;</u> |
| | v. <u>Significant trees over sixty feet (60') in height or greater than eighteen inches (18") caliper.</u> |
| <u>Priority Two</u> | i. <u>Healthy tree groupings whose associated undergrowth can be preserved;</u> |
| | ii. <u>Other significant native evergreen or deciduous trees; and</u> |
| | iii. <u>Other significant non-native trees.</u> |
| <u>Priority Three</u> | <u>Alders and cottonwoods shall be retained when all other trees have been evaluated for retention and are not able to be retained except where adjacent to open space, wetlands or creek buffers.</u> |

~~a. **Damaged and Diseased Trees Excluded:** Trees that are dangerous as defined in RMC 4-11-200, or are safety risks due to root, trunk, or crown structure failure shall not be counted as protected trees.~~

b. Percentage of Tree Retention Based on Zones: Residential: Properties subject to an active land development or building permit shall retain the following percentages of significant trees based on the property's zone. Trees within critical areas and proposed public rights-of-way shall not contribute to the number of significant trees required to be retained.

i. RC, R-1, R-4 and R-8 Zones: Thirty percent (30%) of the significant trees shall be retained in a residential or institutional development.

ii. R-10, R-14, RM-F, RM-T, RM-U and RMH: ~~Ten~~ Twenty percent ~~(10%)~~ (20%) of the significant trees shall be retained in a residential or institutional development.

iii. ~~c.~~ All Other Zones: ~~Five~~ Ten percent ~~(5%)~~ (10%) of the significant trees ~~located on the lot~~ shall be considered protected and retained in commercial or industrial developments.

iv. ~~d.~~ Utility Uses and Mineral Extraction Uses: Such operations shall be exempt from the protected tree retention requirements of this ~~Chapter~~ Section if ~~removal~~ the applicant can justify the exemption ~~be justified~~ in writing to the satisfaction of ~~and approved by~~ the Administrator. (Ord. 5676, 12-3-2012)

c. Calculating Tree Retention: Tree retention standards shall be applied to the developable area of a property (i.e., land within critical areas and their buffers, as well as proposed public rights-of-way, shall be excluded). If the number to be retained includes a fraction of a tree, any amount equal to or greater than one-half (1/2) tree shall be rounded up.

d. Minimum Tree Density: Per RMC 4-4-130C9e, Minimum Tree Density, each residential lot shall have retained, or newly planted, trees that satisfy the lot's minimum tree density requirement. Any protected tree, whether retained or newly planted, that is superfluous to the individual lot's minimum tree density shall not contribute to the total number of trees that are required to be retained for the land development permit.

~~f. e.~~ **Replacement Requirements:** As an alternative to retaining trees, the Administrator may authorize the planting of replacement trees on the site if it can be demonstrated to the satisfaction of the Administrator that an insufficient percentage of trees can be retained.

i. **Replacement Ratio:** When the required number of protected trees cannot be retained, ~~new replacement trees,~~ with at least a two-inch (2") caliper or greater or an evergreen at least six feet (6') tall, shall be planted. ~~The replacement at a rate shall be of twelve (12) caliper inches of new trees to replace each protected tree removed.~~ Up to fifty percent (50%) of trees required per RMC 4-4-070, Landscaping, may contribute to replacement trees. The City may require a bond to ensure the survival of replacement trees.

ii. **Prohibited Types of Replacement Trees:** Unless replacement trees are being used as part of an enhancement project in a critical area or buffer, they shall not consist of any species listed in RMC 4-4-130H7d. ~~When a tree or tree cluster that is part of an approved tree retention plan cannot be retained, mitigation shall be required per subsection H1ei of this Section.~~

iii. **Fee in Lieu:** When it is not feasible to replace trees on the site, as determined by the Administrator, payment into the City's Urban Forestry Program fund may be approved in an amount of money approximating the current market value of the replacement trees and the labor to install them. The value of replacement trees shall be determined by the City.

~~f. Tree retention standards shall be applied to the net developable area. Land within critical areas and their buffers, as well as public rights of way, shall be excluded from the above calculation. If the number to be retained includes a fraction of a tree, any amount equal to or greater than one-half (1/2) tree shall be rounded up.~~

2. Tree Protection Tract: Trees required to be retained, and/or replacement trees approved by the Administrator, shall be preserved by establishing a tree protection tract that encompasses the drip line of all protected trees; however, multiple tree protection tracts may be approved if it can be demonstrated, to the satisfaction of the Administrator, that multiple tracts provide a better site design and/or supports other adopted goals and purposes of this Title..

a. **Applicability:** Tree protection tracts shall be required for any protected trees that are not located on an individual lot. Tree protection tracts may contribute to open space requirements, if applicable.

b. **Standards:**

- i. Tree protection tracts should consist of an aggregation of trees occupying a specific area and sufficiently uniform in species composition, size, age, arrangement, and condition as to be distinguished from adjoining areas;
 - ii. Trees shall be retained and maintained per the recommendations of a certified arborist, or licensed landscape architect, as stated within the required Tree Retention/Land Clearing (Tree Inventory) Plan;
 - iii. Amenities, as approved by the Administrator, may be installed to facilitate passive recreation within the tract. Such amenities might include, but are not limited to benches, picnic tables, and soft surface (semi-permeable) trails.
- c. **Tract Creation and Deed Restriction:** The permit holder shall establish and record a permanent and irrevocable deed restriction on the property title of any tree protection tract or tracts created as a condition of a permit. Such deed restriction(s) shall prohibit development, alteration, or disturbance within the tract except for purposes of installing amenities approved by the Administrator, or habitat enhancement activities as part of an enhancement project, which has received prior written approval from the City. A covenant shall be placed on the tract restricting its separate sale.
- d. **Marking During Construction:** The permit holder shall erect and maintain six-foot (6') high chain-link temporary construction fencing along the perimeter of any tree protection tract. During construction, placards shall be placed on the temporary fencing every fifty feet (50') stating the words, "NO TRESPASSING – Protected Trees."
- e. **Fencing:** The City shall require permanent fencing of the tree protection tract. This shall be accomplished by installing a wood, split-rail fence with applicable signage. Pedestrian-sized openings may be approved by the Administrator for the purpose of facilitating passive recreation within the tract for the benefit of the community. The Administrator may authorize alternate styles and/or materials for the required fencing.
- f. **Signage Required:** The common boundary between a tree protection tract and the abutting land must be permanently identified. This identification shall include permanent wood or metal signs on treated wood, or metal posts. Sign locations and size specifications shall be approved by the City. Suggested wording is as follows: "Protection of these trees is in your care. Alteration or disturbance is prohibited by law."
- g. **Responsibility for Ownership and Maintenance:** Ownership and responsibility for maintaining the tree protection tract(s) and protected trees therein shall be held by a

homeowners association, abutting lot owners, the permit applicant or designee, or other appropriate entity, as approved by the City.

- h. Maintenance Covenant and Note Required:** The following note shall appear on the face of all plats, short plats, PUDs, or other approved site plans containing at least one tree protection tract, and shall also be recorded as a covenant running with the land on the title of record for all affected lots on the title: "MAINTENANCE RESPONSIBILITY: All owners of lots created by or benefiting from this City action are responsible for maintenance and protection of the tree protection tract. Maintenance includes ensuring that no alterations occur within the tract and that all vegetation remains undisturbed unless the express written authorization of the City has been received."
- In an effort to dissuade property owners from illegally removing trees, staff recommends increasing the tree replacement ratio for trees that are unlawfully removed:

Replacement Required: The City may require, for each tree that was improperly cut and/or removed in violation of, or without, an approved Land Development Permit and associated tree retention and land clearing plan, replacement planting of a tree of equal size, quality and species or replacement trees at a rate of one-to-one (1:1) caliper inches. up to eighteen (18) caliper inches of trees of the same species in the immediate vicinity of the tree(s) that was/were removed.

- Added the following requirements for a Tree Retention/Land Clearing (Tree Inventory) Plan:
 - d. For trees proposed to be retained, a complete description of each tree's health, condition, and viability;
 - e. For trees proposed to be retained, a description of the method(s) used to determine the limits of disturbance (i.e., critical root zone, root plate diameter, or a case-by-case basis description for individual trees);
 - f. For trees proposed to be preserved within a tree protection tract, any special instructions for maintenance (e.g., trimming, ground clearing, root pruning, monitoring, aftercare, etc.);
 - g. For trees not viable for retention, the reason(s) for removal based on poor health, high risk of failure due to structure, defects, unavoidable isolation (i.e., high blow down

potential), or unsuitability of species, etc., and for which no reasonable alternative action is possible (pruning, cabling, etc.);

h. Describe the impact of necessary tree removal to the remaining trees, including those in a grove or on adjacent properties;

i. For development applications, a discussion of timing and installation of tree protection measures that must include fencing and be in accordance with the tree protection standards as outlined in RMC 4-4-130H.8;

j. The suggested location and species of supplemental trees to be used when required. The report shall include planting and maintenance specifications;

The following “staff issues” and “staff responses” are intended to provide some insight regarding staff discussions related to this Docket Item:

Staff Issue: Should all trees be measured by their caliper rather than by height in the case of evergreens?

Staff Response: Yes, it would be helpful to measure all trees using one metric; however, evergreens are typically sold based on their height, so evergreens should qualify as replacement trees based on their height. Furthermore, alders and cottonwoods are less desirable trees and therefore, to qualify as a protected tree they should have at least an eight inch (8”) caliper rather than a six inch (6”) caliper.

Staff Issue: A staff member presented a compelling case that not allowing any required landscaping to apply to replacement tree plantings could prove to be very difficult, recognizing that trees require a certain amount of land area to survive.

Staff Response: Up to fifty percent (50%) of trees required per RMC 4-4-070, Landscaping, may contribute to replacement trees.

Staff Issue: A minimum tree density might be onerous for commercial development in areas such as downtown, or even for large commercial/industrial developments where buildings and surface parking dominate the site.

Staff Response: The “commercial/industrial” land use category was removed from the minimum tree density table. Interior landscaping for parking lots require one (1) tree for every six (6) parking spaces (approximately 180 sq. ft.) and is required to be maintained. Landscaping

requirements for a typical commercial/industrial development will provide a sufficient tree density.

Staff Issue: Violations for the unlawful removal of trees need to be severe enough to deter such actions.

Staff Response: “The City may require, for each tree that was improperly cut and/or removed in violation of, or without, an approved Land Development Permit and associated tree retention and land clearing plan, replacement planting of a tree of equal size, quality and species or replacement trees at a rate of one-to-one (1:1) caliper inches.”

Staff Issue: The current Tree Retention/Land Clearing (Tree Inventory) Plan does not require an arborist report that addresses the trees proposed to be retained with respect to their health, rationale for selecting the trees, maintenance and protection during construction, etc.

Staff Response: The Tree Retention/Land Clearing (Tree Inventory) Plan defined in RMC 4-8-120D.20: Definitions T, is proposed to be supplemented with additional information required for a complete submittal.

Impact Analysis

Effect on rate of growth, development, and conversion of land as envisioned in the Plan

The proposed revisions will likely have an insignificant effect on the rate of growth, development or the conversion of land as envisioned in the Plan.

Effect on the City’s capacity to provide adequate public facilities

Not applicable

Effect on the rate of population and employment growth

None

Whether Plan objectives are being met as specified or remain valid and desirable

Several Plan objectives are being met or furthered by the proposed revisions, specifically the following:

Objective CD-A: The City's unique natural features, including land form, vegetation, lakeshore, river, creeks and streams, and wetlands should be protected and enhanced as opportunities arise.

Objective EN-J: Create a sustainable urban forest that enhances the livability of the community.

Objective EN-K: Protect, restore and enhance environmental quality through land use plans and patterns, surface water management programs, park master programs, urban

forestry programs, transportation planning, development reviews, incentive programs and work with citizens, land owners, and public and private agencies.

Effect on general land values or housing costs

The University of Washington’s College of the Environment prepared an article that compiled a wealth of research conducted by economists and social scientists to valuate natural assets in cities and towns. The article provides a significant amount of information, however, this excerpt is the most concise and relevant:

“Market price studies of treed versus untreed lots show a range of value enhancements:

| Price Increase | Condition |
|-----------------------|--|
| 18% | building lots with substantial mature tree cover |
| 22% | tree-covered undeveloped acreage |
| 19-35% | lots bordering suburban wooded preserves |
| 37% | open land that is two-thirds wooded |

Generally, trees and forest cover in development growth areas add value to parcels. One study found that development costs were 5.5% greater for lots where trees were conserved.²⁰ Given increased lot and home valuations, builders have reported that they were able to recover the extra costs of preserving trees through a higher sales price for a house, and that homes on wooded lots sell sooner than homes on unwooded lots.”

Wolf, K.L. 2010. Community Economics - A Literature Review. In: Green Cities: Good Health (www.greenhealth.washington.edu). College of the Environment, University of Washington.

Whether capital improvements or expenditures are being made or completed as expected

Not applicable

Consistency with GMA, the Plan, and Countywide Planning Policies

The proposed revisions are consistent with the GMA and multi-county planning policies of Vision 2040, specifically:

MPP-En-3: Maintain and, where possible, improve air and water quality, soils, and natural systems to ensure the health and well-being of people, animals, and plants. Reduce the impacts of transportation on air and water quality, and climate change.

MPP-En-5: Locate development in a manner that minimizes impacts to natural features. Promote the use of innovative environmentally sensitive development practices, including design, materials, construction, and on-going maintenance.

MPP-En-9: Designate, protect, and enhance significant open spaces, natural resources, and critical areas through mechanisms, such as the review and comment of countywide planning policies and local plans and provisions.

The proposed revisions are also consistent with the Countywide Planning Policies and the Comprehensive Plan, specifically:

Policy EN-26. Promote the return of precipitation to the soil at natural rates near where it falls through development design which minimizes impermeable surface coverage and maximizing infiltration through the exposure of natural surfaces through the use of grassy swales, trees, landscaping, where feasible.

Policy EN-27. Promote development of Renton's urban forest through tree planting programs, tree maintenance programs that favor the use of large healthy trees along streets, in parks, in residential, commercial, and industrial areas, and through the protection and restoration of forest ecosystems.

Policy EN- 38. Develop the urban forestry program to maintain and expand vegetation on public and private property in order to minimize the impact of development on natural systems such as forests and individual trees and increase canopy cover to increase the ecosystem services that trees and other vegetation provide.

Policy CD-1. Integrate development into natural areas by clustering development and/or adjusting site plans to preserve wetlands, steep slopes, and notable stands of trees or other vegetation. Natural features should function as site amenities. Use incentives such as flexible lot size and configuration to encourage preservation and add amenity value.

Policy CD-7. Interpret development standards to support projects incorporating site features such as distinctive stands of trees and natural slopes that can be retained to enhance neighborhood character and preserve property values where possible. Replanting should occur where trees are not retained due to safety concerns. Retention of unique site features should be balanced with the objective of investing in neighborhoods within the overall context of the Vision Statement of this Comprehensive Plan.

Policy CD-8. During development, significant trees, either individually or in stands, should be preserved, replaced, or as a last option, relocated.

Policy CD-79. Existing mature vegetation and distinctive trees should be retained and protected in developments.

Effect on critical areas and natural resource lands

The proposed amendments specify that significant trees adjacent to critical areas and their buffers are designated as a top priority for tree retention requirements. Retaining trees

adjacent to critical areas will help protect these environmentally sensitive areas by creating a greater buffer and helping to shield the trees within critical areas from strong winds.

Effect on other considerations

None

Staff Recommendation

Amend RMC 4-4-130 and 4-11-200 as described to ensure more trees within the City are retained and properly maintained.

Implementation Requirements

Adopt an ordinance amending RMC 4-4-130: Tree Retention and Land Clearing Regulations, RMC 4-11-040: Definitions D, RMC 4-11-080: Definitions H, RMC 4-11-200: Definitions T and RMC 4-8-120: Submittal Requirements – Specific to Application Type.