

1. Clarification of “imminent hazard” relative to vegetation and overhead powerlines

SMP 9.10.B -- Tree Protection, Retention and Replacement

9.10.B.1 -- “...Trees located on properties not undergoing development or redevelopment may not be removed unless they present an imminent hazard to existing structures or the public...”

9.10.B.2 -- “...Only trees that interfere with access and passage on public trails or trees that present an imminent hazard to existing structures or the public may be removed from sites without an issued building permit or Federal approval...”

9.10.B.9 -- “Topping of trees is prohibited unless absolutely necessary to protect overhead utility lines. Topping of trees will be regulated as removal and tree replacement will be required.”

PSE Comments:

- Modify subsections (1) and (2) above to clarify that vegetation being too close to overhead powerlines is a hazardous situation (which if not addressed, could harm persons or property).
 - ➔ 9.10.B.1 -- “...Trees located on properties not undergoing development or redevelopment may not be removed unless they present an imminent hazard to existing structures, overhead powerlines, or the public...”
 - ➔ 9.10.B.2 -- “...Only trees that interfere with access and passage on public trails or trees that present an imminent hazard to existing structures, overhead powerlines, or the public may be removed from sites without an issued building permit or Federal approval.”
- Add new subsection to clarify the hazard issue.
 - ➔ 9.10.B.11 -- “Imminent hazard shall be defined to include vegetation that could grow, or has grown, too close to overhead powerlines.”
- Add new subsection to encourage utilities and the City to work together to develop stable plant communities underneath overhead powerlines, the plants being species that will mature at low enough heights so as to not create hazards.
 - ➔ 9.10.B.12 -- “Utilities are encouraged to seek the City’s assistance in developing long term tree maintenance, removal and re-vegetation plans where overhead powerlines are located within or adjacent to shoreline areas, to avoid hazardous situations which could result from vegetation growing too close to the powerlines.”

2. Tree diameters in determining replacement ratios

SMP 9.10.B.4 -- Tree Protection, Retention and Replacement

9.10.B.4 -- “Where permitted, significant trees that are removed from the shoreline shall be replaced pursuant to the replacement ratios in Table 4 up to a density of 100 trees per acre (including existing trees).”

Table 4: Tree Replacement Requirements

Diameter* of Tree Removed	No. of Replacement Trees Required
4-6 inches (single trunk) 2 inches (any trunk of a multi-trunk tree)	3
Over 6 – 8 inches	4
Over 8 – 20 inches	6
Over 20 inches	8

*measured at height of 4 feet from the ground

PSE Comments:

- o PSE suggests clarifying the tree diameters listed in Table 4 as follows:



Diameter* of Tree Removed (inches)	No. of Replacement Trees Required
4 to 6 (single trunk) 2+ (any trunk of a multi-trunk tree)	3
Over 6, up to 8	4
Over 8, up to 20	6
Over 20	8

- o PSE understands that the ISA standard for measuring tree diameter dictates that the measurement be taken at 4.5 feet above the ground, not 4.0 feet. This is consistent with TMC 18.06.775 definition of Significant Tree.

➔ Modify the note below Table 4 to reference a height of 4.5 feet.

3. Tree replacement ratios for tree topping versus tree removal

SMP 9.10.B.9 -- Tree Protection, Retention and Replacement

9.10.B.9 -- “Topping of trees is prohibited unless absolutely necessary to protect overhead utility lines. Topping of trees will be regulated as removal and tree replacement will be required.”

PSE Comments:

- PSE suggests that topping some trees at a reasonable height, like willows at 15 feet, is not as detrimental as removal and that therefore the replacement ratio for a topped tree should be less than stated in Table 4.

4. Allowed Tree Height underneath overhead powerlines

SMP 9.10.C -- Landscaping General Requirements section

9.10.C.1.o -- "The following standards apply to utilities and loading docks located in the shoreline jurisdiction:

9.10.C.1.o.2 – "Utility easements shall be landscaped with native, groundcover, grasses or other low-growing plants as appropriate to the shoreline environment and site conditions."

PSE Comments:

- Subsection (2) above is helpful but the SMP could go further to help avoid future hazards. Therefore, modify the section to restrict the "mature height" of plantings under overhead powerlines, whether landscaping or mitigation, to avoid future hazardous conditions.
 - ➔ 9.10.C.1.o.2 – "Utility easements and areas underneath overhead powerlines shall be landscaped with native, groundcover, grasses or other low-growing plants with height at maturity less than 15 feet as appropriate to the shoreline environment and site conditions."

5. Exemption for pruning trees underneath overhead powerlines

SMP 9.10.D -- Vegetation Management in the Shoreline Jurisdiction

9.10.D.1 -- Vegetation Management in the Shoreline Jurisdiction

"Trees and shrubs may only be pruned for safety, to maintain view or access corridors and trails by pruning up or on the sides of trees, to maintain clearance for utility lines, and/or for improving shoreline ecological function. This type of pruning is exempt from any permit requirements. Topping of trees is prohibited except where absolutely necessary to avoid interference with existing utilities."

PSE Comments:

- PSE commends the City of Tukwila for stating that pruning of trees near overhead powerlines is exempt from any permit requirements. This will reduce hazards.

6. Incidental edits

SMP 9.10.B.3.d (second line)

9.10.B.3.d -- "...boundary and nay sensitive areas with their buffers..."

PSE Comments:

- Correct the typo.
 - ➔ 9.10.B.3.d -- "...boundary and ~~nay~~ any sensitive areas with their buffers..."

SMP 9.10.B.5 – Clarify “property owner” to include utility within an easement

9.10.B.5 (the first line) -- “The property owner is required to ensure...”

9.10.C.1.m (the second line) -- “...preceding standards shall be maintained by the property owner...”

PSE Comments:

- A utility is not always the “property owner” relative to vegetation pruning, topping or removal activities, so modify the phrase to indicate that a utility maintaining vegetation within an easement can be the responsible party relative to maintaining planted vegetation.
 - ➔ 9.10.B.5 (the first line) -- “The property owner (or applicant if a utility operating within an easement) is required to ensure...”
 - ➔ 9.10.C.1.m (the second line) -- “...preceding standards shall be maintained by the property owner (or applicant if a utility operating within an easement) ...”

SMP 9.10.C.1.g (lines 5 and 6)

9.10.C.1.g -- “...Site conditions, such as topography, exposure, and hydrology shall be taken into account for plant selection...”

PSE Comments:

- Since tall growing vegetation underneath overhead utility powerlines can create a hazard, add reference to powerlines as another site condition to be considered when designing a planting plan.
 - ➔ 9.10.C.1.g -- “...Site conditions, such as topography, exposure, ~~and~~ hydrology and overhead utility powerlines shall be taken into account for plant selection...”