MATERIAL PREPARED FOR DISCUSSION BY THE URBAN FORESTRY COMMISSION.

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First draft 12-9-15

Urban Forestry Commission Comments on ECA update

- 1.Overall: should have section numbers at the top of each page. Too hard to find your way around without that.
- 2.Overall: should not have section numbers embedded in new text without an explanation of what the section numbers refer to. Otherwise, the document becomes a maze.
- 3.Overall: should be one tenth the size. The next iteration needs to be greatly condensed and simplified or consolidated into tables so that an ordinary reader can follow it. This version requires one with legal skills.
- 4.Pages 7, section B, line 26 flood prone areas needs a reference like the FEMA maps.
- 5.Page 9, section 4, line 18 "areas that provide habitat for wildlife" needs greater definition. Does any area with a squirrel qualify?
- 6.Page 13, section B, line 4 "it is impossible to know what that means with all the section references and no explanation of what they contain. See example of #2 above.
- 7.Page 17, section f, line 5 Public projects apparently can be built with less rigor than non-public projects. That shouldn't be so. Tighten up the requirements and require third party independent reviews.
- 8.Page 34-35, table These appear to be two versions of the same table.
- 9.Page 58, section D, line 10 etc. Find out if the definition of "species of local importance" given by this document is the same as used by WDFW. It could be too tight, requiring endangered species status or species in decline without giving any quantifiable way to measure this status. There is only one species in this category now, the the GBH.
- 10. Comments on X-2015 revised **GBH** Director's Rule. Incorporate comments from Heron Habitat Helpers, not received yet.